

# Lead Safe Auditor

July-September 2022

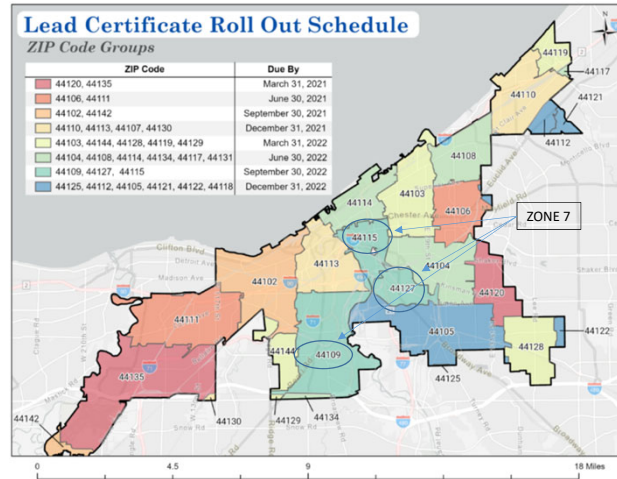
Report to the Lead Safe Advisory Board  
City of Cleveland

November 11, 2022

## Report Outline

- Context – Zones & Rental Universe
- Implementation Progress
- Quarterly Metrics
- Compliance Data
- Conclusions

# Roll-out Zones – Zone 7

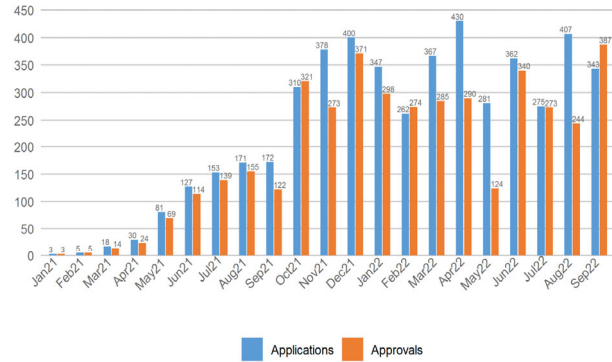
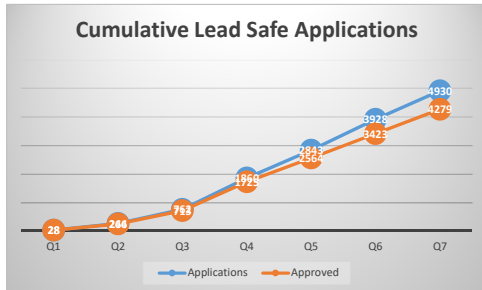


## Zones 1-7 rental universe

**Table 1 – Roll-out Zones Subject to the Ordinance through September 2022**

Roll-out Zone	Zip Code	Est Universe of Rental Properties	# Properties on Rental Registry 2019	# Likely Rental Properties not on Rental Registry
Zone 1	44120	4,245	1,146	3,099
	44135	3,039	1,033	2,006
Z1 Total		7,284	2,179	5,105
Zone 2	44111	5,327	1,705	3,622
	44106	1,713	308	1,405
Z2 Total		7,040	2,013	5,027
Zone 3	44102	6,889	2,342	4,547
	Z3 Total	6,889	2,342	4,547
Zone 4	44107	18	3	15
	44110	3,328	1,065	2,263
	44113	2,177	610	1,567
Z4 Total		5,523	1,678	3,845
Zone 5	44103	2,380	500	1,880
	44119	1,006	292	714
	44128	2,621	917	1,704
	44144	1,178	401	777
Z5 Total		7,185	2,110	5,075
Zone 6	44104	2,282	456	1,826
	44108	3,874	891	2,983
	44114	315	69	246
	44134	12	4	8
	44117	3	1	2
Z6 Total		6,486	1,421	5,065
Zone 7	44109	5,967	2,148	3,819
	44115	81	18	63
	44127	894	232	662
Z7 Total		6,942	2,398	4,544
Zone 8	44105	6,258	1,752	4,506
	44112	715	157	558
	44121	182	66	116
Z8 Total*		7,155	1,975	5,180

## Lead Safe Applications Count by Month



- 1,026 applications in quarter, down 4.6% from previous quarter (1,076)
- Among applications for which a determination was made (i.e., excluding pending, exempt), 97% approval.

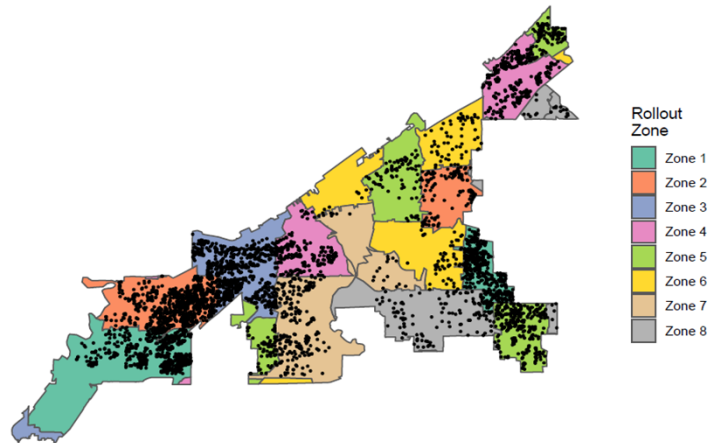
## Lead Safe Applications Count by Zone

Zone	Apps	Units	Approved	Denial	Exempt	Pending	To be Reviewed
1	1,207	3,745	1,088	63	37	6	12
2	1,062	3,741	945	73	28	4	12
3	804	3,328	698	74	11	3	18
4	570	4,229	498	45	14	3	10
5	596	1,749	540	23	16	4	13
6	183	2,765	125	27	14	3	14
7	310	1,881	242	14	5	10	39
8	198	297	143	28	1	3	23
Total	4,930	21,735	4,279	348	126	36	141

- Zones 1 & 2 now exceed 1,000 applications each
- 87% of applications approved, 7% denied
- Among applications for which a determination was made (i.e., excluding pending, exempt), 92% approval.
- Denied applications jumped in this quarter from 101 to 348 (from 496 to 2,512 units) - 5 apps account for half these units
- 6 certifications were revoked- 3 for conflict of interest, 2 LHCO, 1 out of city

## Lead Safe Certifications in Zones 1-7

Properties Issued a Lead Safe Certification through 09/30/2022

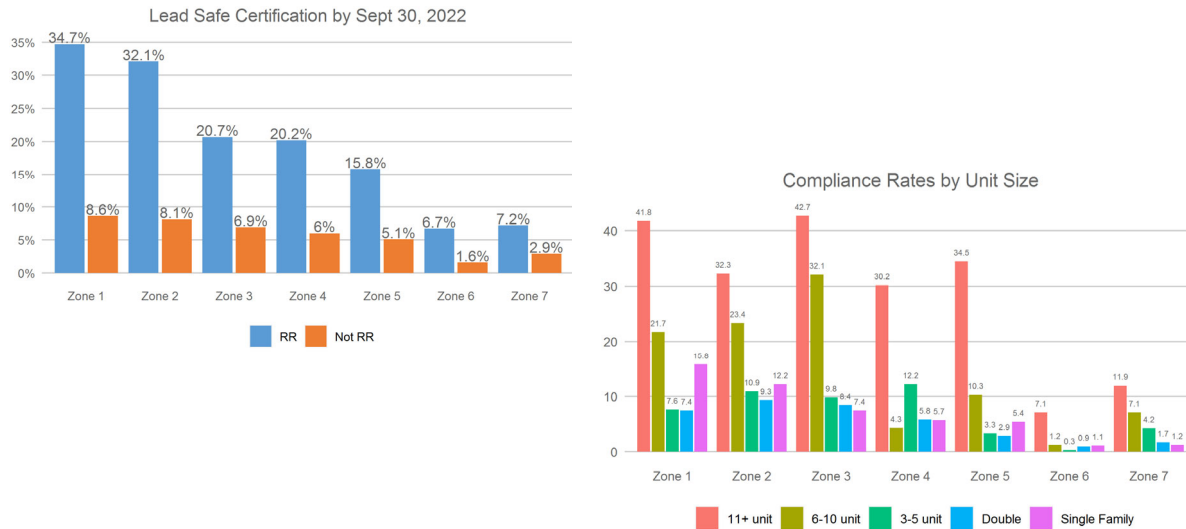


## Quarterly Metrics (through 9/30/22)

Lead Safe Certification	Property Count	Units Involved
Lead Safe Certifications submitted	4,930	21,735
Lead Safe Certifications approved	4,279	18,035
Lead Safe Certifications pending	177	366
Lead Safe Certifications denied	348	2,512
Citations for noncompliance	TBD	TBD

Note: 126 applications (743 units) were coded as exempt.

## Compliance by Rental Status and Property Size



## Data on Lead Safe Certification Applications

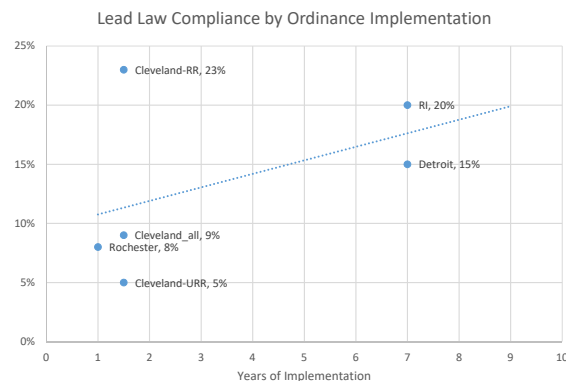
- **Lead Safe applications processing has slowed –**
  - 29 days = Avg time between submission and a determination letter being issued, has increased from 12 days in first quarter of 2022
  - 35% of determinations took greater than 30 days, more than double the rate in prior quarter (16%)
- **Many properties owners represented among applications –**
  - 3,384 unique property owners have applied for lead safe certification; 43% have applied for a single property and 29% for two properties. 13% have applied for 3-4 properties, and 14% have applied for 5 or more properties.
  - 691 new owners applied for lead safe certification in quarter
- **Most lead inspections conducted by small number of licensed contractors –**
  - 119 licensed lead assessors conducted lead inspections, median # of applications per inspector was 10
  - 12 inspectors connected with >100 applications; 2 more than 300; 10 inspectors account for over half (53%) of all lead inspections connected to submitted lead safe applications

## Primary Conclusions

- Lead safe applications were nearly flat, marking the fourth quarter at approximately 1,000
- Overall compliance trend in line with peer cities but well below level required to reach full compliance in 5 years
- Approval rates remain high but denials are up markedly and processing times have grown substantially
- Small number of licensed lead inspectors connected to majority of lead safe applications (10 account for 53% of applications)
- Compliance remains higher among previously registered rentals and larger properties and in Zones with more time elapsed
- Zone 1 shows (>1.5 years post-deadline) –
  - 35% compliance among previously registered rentals vs 9% of nonregistered
  - Compliance highest for large properties (42% of >10 units); 7-8% doubles and 3-5 units; 14% of single

## Compliance Progress Context

- Trends found in cities pursuing lead safety
  - Detroit (2010 launch)
  - Rochester (2006 launch)
  - Rhode Island (2002 launch)
- At 15 years, Rochester reported 85% compliance
- To reach a 7-year goal of compliance (by 2028), the volume of LSC applications would need to reach approximately 2,500 per quarter (vs average of 1,000 applications per quarter over most recent 3 quarters)



## Lead Safe Comment Portal – Q7

7/19/2022	Senior Strategist for the City of Cleveland	Homeowner did Lead Safe Certificate process and is not receiving Lead Rebate in a timely manor	Lead safe certification process
7/20/2022	Senior Strategist for the City of Cleveland	issue with funds coming from CHN.	CHN issue
7/28/2022	City of Cleveland employee	An inspector informed me that tenants are being openly hostile and attacking, and some have even pulled guns on the inspectors. The inspector mentioned carrying firearms himself and ordering bullet proof jackets to continue performing clearances. Apparently this is because tenants have learned that without the lead safe certificate they won't be evicted. Therefore are attempting to interrupt the inspectors.	Lead safe workers
8/9/2022	Senior Strategist for the City of Cleveland	Landlord not getting a response to assistance needed to repair 4 unit building. calls to CHN and Lead Safe resource Center made with no Returned call	A lead safe home repair project
8/16/2022	City Employee	Phone caller says no one answers phone at resource center	Lead Safe Resource Center
8/22/2022	Senior Strategist for the City of Cleveland	Ms. Chana Bader has submitted a complaint about a contractor who stole her money after contracting to do lead work at one of her homes. She did not tell me which home this was for. the name of the Contractor was <name>	A lead safe home repair project
10/19/2022	City Employee	A customer complained that they called the resource center 3 times in the last week and never got an answer or return call	Lead Safe Resource Center
11/2/2022	Senior Strategist for the City of Cleveland	Complaint from Landlord about grant funding. If they have received incentive money recently they are not allowed to apply for additional money from lead safe home fund grants?	A lead safe home repair project