



Lead Safe Auditor

Report to the Lead Safe Advisory Board
City of Cleveland

Period: October 1 – December 31, 2023

March 2024



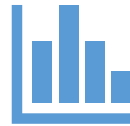
Report Outline



Context – Zones
& Rental
Universe



Implementation
Progress



Quarterly
Metrics



Compliance
Findings



Conclusions

Data through December 31, 2023

- Cumulative First-Time Applications

- Submitted: 7,567 applications (33,631 units)
- Approved: 6,756 applications (30,934 units)
- Denied: 637 applications (1,937 units)
- Exempt: 24 applications (522 units)
- Pending: 150 applications (238 units)

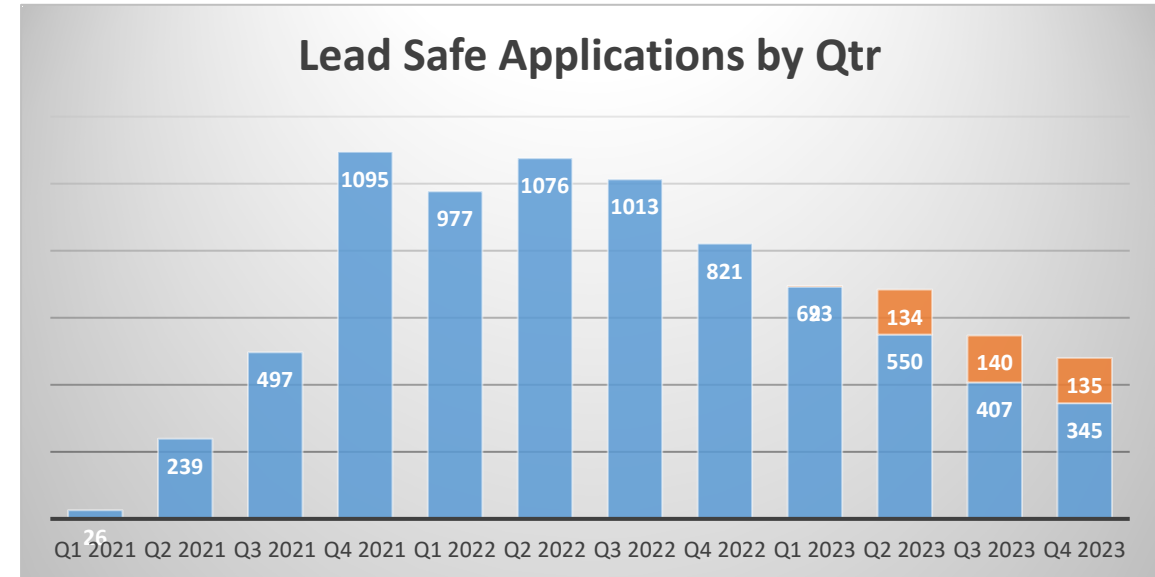
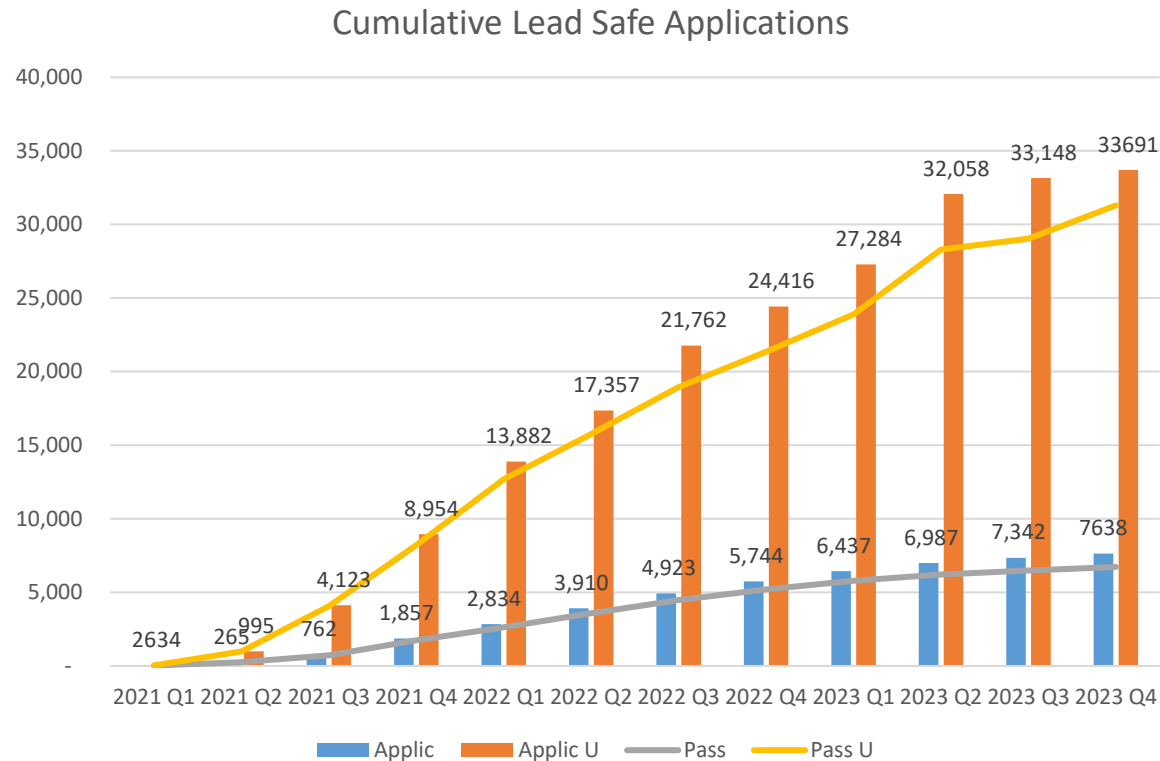


Approx 14% of properties and 32% of rental units (full universe in City)

- Renewal Applications

- 1,711 properties initially certified in first 4 quarters of rollout (Jan-Dec 2021) have reached two-year renewal point
- As of 12/31/2023: 328 of these (19%) had renewed and 1,383 had expired

Lead Safe Applications Count by Quarter



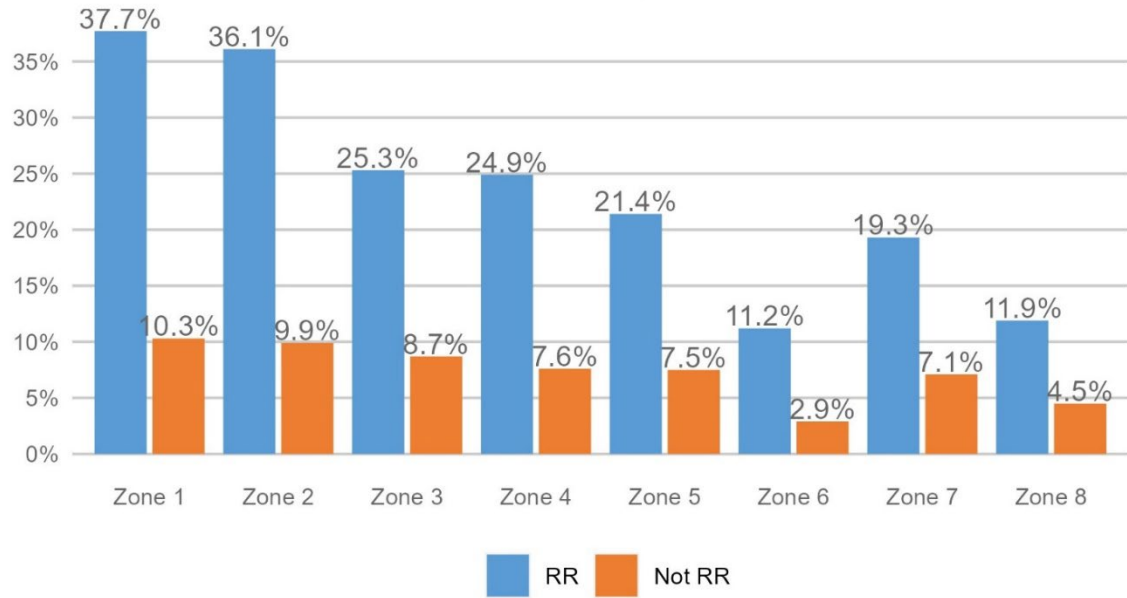
- 345 applications in quarter and 135 renewal applications
- 5th consecutive quarter of decline in new applications

Quarterly Metrics (through 12/31/23)

Lead Safe Certification	Property Count	Units Involved
Initial Certifications submitted	7,567	33,631
Initial Certifications approved	6,756	30,934
Initial Certifications denied	637	1,937
Renewal Certifications approved	328	1,093
Initial Certifications expired	1,383	6,026
Properties receiving 20-year LSC	166	4,030

Compliance by Rental Status and Property Size

Lead Safe Certifications by December 31, 2023

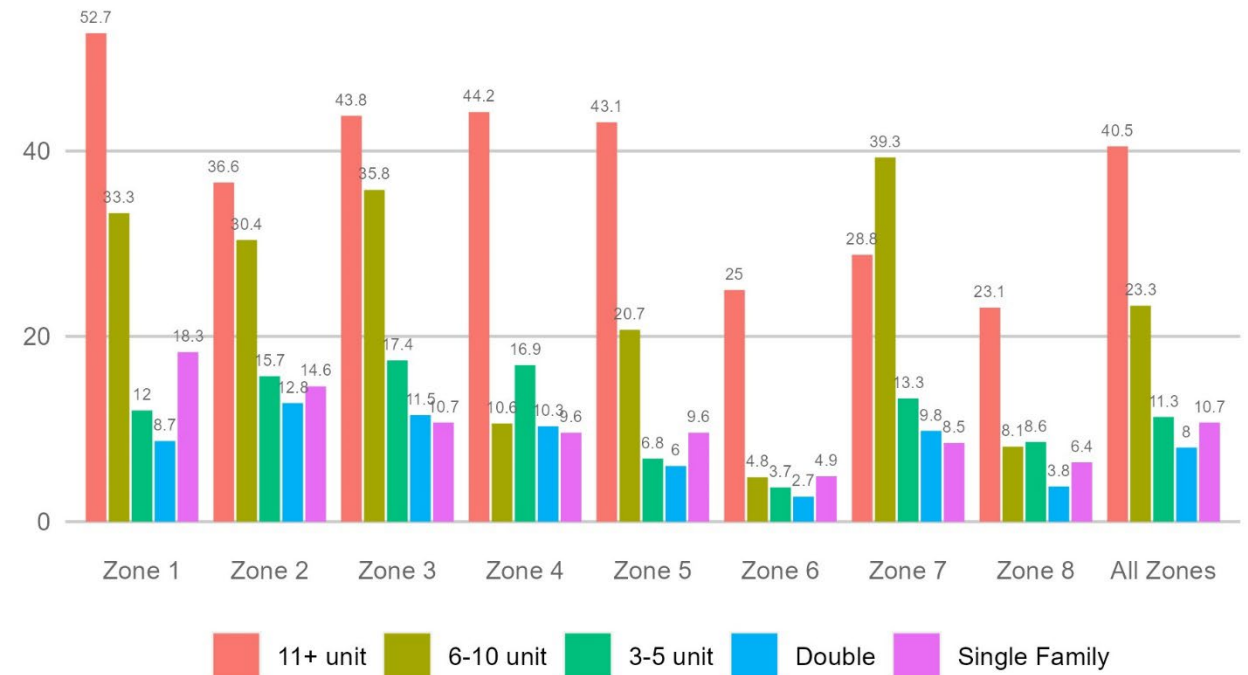


*Includes certifications that are currently expired or pending renewal

Previously registered rentals 3x more likely to be certified compared to unregistered

Larger properties (6 or more units) much 2-4x more likely to be certified

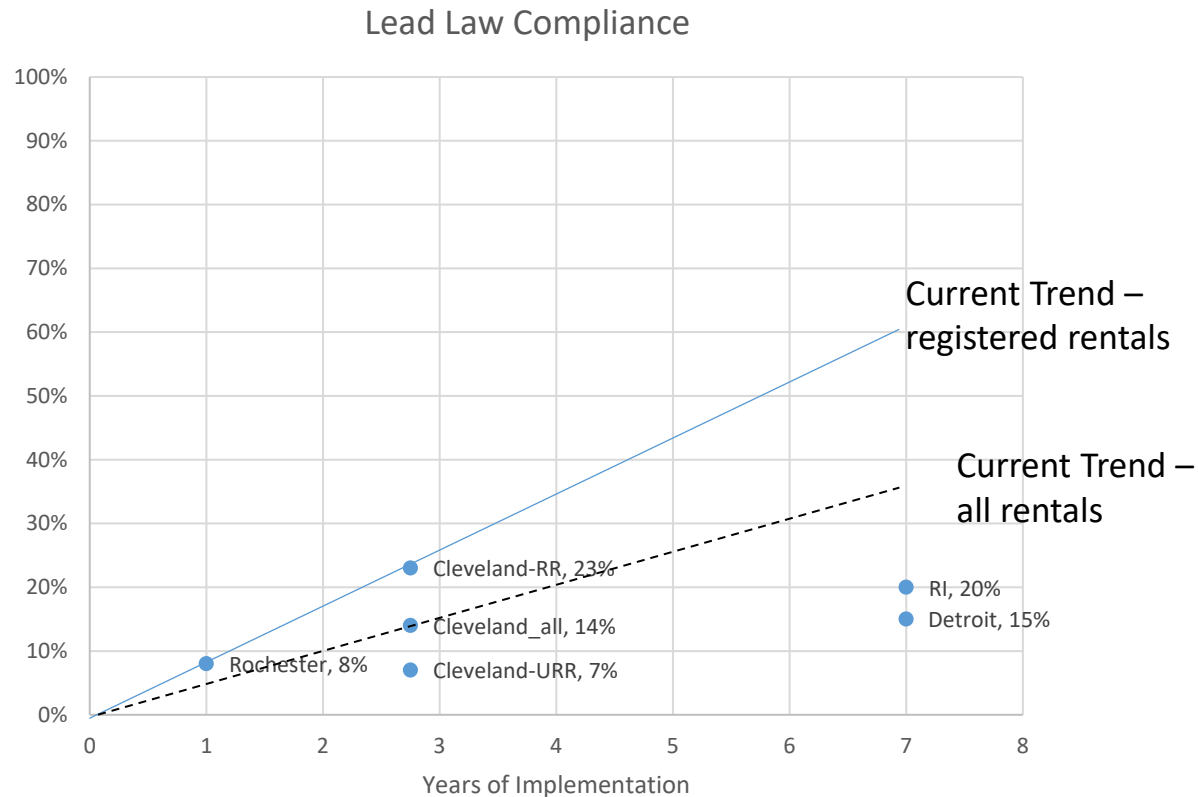
Compliance Rates by Unit Size



B&H Practice Changes

- Beginning in fall 2022, B&H has clarified and adopted refinements to standards for the processing of Lead Safe applications
- These changes were announced via e-mail to inspectors and changes included clarification of various specific submission guidelines
- Some changes have been more substantive -
 - All units on the parcel must be tested before certification can be achieved: HOWEVER, all units need to be submitted together at one time. The oldest report for the structure can be no older than 90 days from the date of submission (11/2/22)
 - No longer accept adjustments to reports after submission (8/9/23)
 - Elimination of winter deferment option (1/2/24); previously deferments were on a case-by-case basis (11/2/22)

Compliance Trend



To reach a 7-year goal of compliance (by 2028), the volume of LSC applications would need to reach approximately 2,700 per quarter

For each quarter that achieves less than 2,700 new applications, the quarterly number needed in remaining period increases

Without high compliance on two-year renewals, achieving overall success in rental landscape is at risk

Primary Conclusions

New Lead safe applications declined in 4th Quarter 2023 to 345, continuing a concerning six-quarter decline (down from 1,000/qtr in mid 2022)

Application approval rates remain high (89%) but denied applications (n=637) involve nearly 2,000 units of housing

Renewals among previously certified properties have declined to 19% suggesting owner ambivalence to continued compliance; continued nonrenewal jeopardizes overall objectives

Compliance trend among registered rentals well ahead of peer cities (23%), but below level required to reach full compliance by 2018; compliance among likely rentals approx. 7%

Lead Safe Comment Portal – September- December 2023

11/15/2023	Lead Risk Assessor	City ordinance 365.04.A.1 states that the 90 day limit starts when the residence has obtained clearance. The Building Department has interpreted this incorrectly. They say the 90 day limit starts when the clearance process begins. All dates are based on the lab certificate dates. There is no time limit to obtain a clearance in any HUD rule or ODH ordinance. This is slowing down the process of obtaining a lead safe certificate.
11/16/2023	Lead Risk Assessor	Am I allowed to attend the meeting on December 14.?