**LEAD SAFE HOUSING ACTION BOARD**

Report to the City of Cleveland

January 2021

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**Background**

The City of Cleveland established the Lead Safe Housing Action Board (Action Board) under [Ordinance 747-2019](https://cityofcleveland.legistar.com/LegislationDetail.aspx?ID=3971384&GUID=55AA3B1D-224B-41FD-B228-FC528D10269C&Options=ID%7CText%7C&Search=747-2019) for the purpose of “supporting families who must relocate as a result of a lead hazard control order, lead safe maintenance or lead poisoning.”

The ordinance indicates that the Action Board must include representation from non-profit entities funded by the City that provide housing in Cleveland. The ordinance also indicates that the Action Board must be responsible for “maintain[ing] a list of housing units available for families forced to relocate and providing help with problems that arise as a result of forced relocation.”

To implement this statute, the City of Cleveland Department of Community Development began convening a number of housing organizations, community development corporations, and other non-profit organizations providing housing support in March 2021.

Participants in the Action Board have been implementing solutions to legacy housing problems, like lead poisoning, across our city for years. Bringing their expertise to bear on this Board means collectively tackling an underfunded, systematic challenge that is, unfortunately, familiar – helping Clevelanders find safe, decent, affordable housing.

For a full list of participating organizations, please see appendix.

The Action Board, and a self-selected brainstorming subcommittee, held a series of virtual meetings over the course of 2021. *During and between those meetings, the Action Board established shared goal, value statement, analyzed the current housing landscape and its gaps, and developed several proposals to address the issue of displacement due to lead. This report is a summary of that work.*

**Goal and Value Statement**

Early in our meetings, the Action Board agreed to the following shared goal:

***“Think strategically and boldly about how our community can address the existing and potential problem of displacement caused by lead.”***

The Action Board also established a value statement that both set expectations and outlined our commitment. If the goal is the *what*, then the value statement is the *how*. The Action Board set the following shared value statement:

***“The Action Board understands that making systems level changes are complex, and we are proactively working to mitigate any potential disruptions to our communities. We are committed to exploring the replicability/scalability of existing relocation best practices as well as brainstorm creatively and openly about proactively creating a better housing relocation system.”***

Beyond this report, we hope that the goal and value statement will continue to be useful guidance as the Action Board continues to meet at its mandated 6-month interval.

**Explanation of the Issue**

Since the Action Board was created to “support families who must relocate because of lead,” we focused first on defining “relocation.” The Action Board agreed that the term displacement often better reflected the intent of our work and, as a result, the two terms are used interchangeably throughout this report.

The Action Board discussed at length whether the definition of relocation, or displacement, should include the concept of voluntary or elective moves. Some members believe that including the concept of voluntary or elective is an arbitrary and unnecessary limitation. For instance, when a child receives a positive test for elevated blood lead level (EBLL), many families feel that they must move. Despite not necessarily being forced from their home, they would not describe their desire to move as voluntary or elective.

On the other hand, the majority of members broadly defined **displacement as a tenant facing an unavoidable, temporary or permanent, relocation. In limited instances, displacement – as we define it - could impact homeowners as well.**

The Action Board further identified **two potential *causes* of displacement by lead poisoning:**

**(1)** Potential displacement caused by work done to achieve the Lead Safe Certification mandate.

**(2)** Displacement caused by an unaddressed lead hazard control order, as known as a “placarded” home, when a child has been lead poisoned and the home has not been remediated as required by a public health investigation.

The Action Board further agreed that this definition of displacement, or relocation, should encompass tenants who choose to move due to Lead Safe Certification non-compliance on behalf of their property owner. (Related, the Action Board expressed interest in seeing community legal advocates and the City of Cleveland pursue existing tenant protections, such as rent strikes, to encourage compliance with the Lead Safe Certification or even Lead Hazard Control Orders. That interest is outlined as a recommendation in this report.)

The Action Board also agreed that the definition of displacement, or relocation, should include encompass “at-risk” tenants, similar to how our community addresses homelessness. In the homelessness sector, there are interventions for individuals experiencing homelessness as well as interventions for individuals at-risk of homelessness. The definition of displacement, or relocation, should include tenants at risk of displacement.

Given these important considerations when defining displacement and relocation, the pilots outlined in this report should, accordingly, consider the non-complaint situation as well as at-risk category in their eligibility. If a tenant believes that their unit or property poses a credible lead hazard, or if a tenant believes they are at risk of lead poisoning, the Action Board recommends that at least one or more of the pilots will be structured to support those tenants with a relocation.

Based on the lead safe approach and experiences in other communities, displacement is not expected due to the Lead Safe Certification. The lead safe approach, successfully in deployed in other communities, requires a lower level, more cost-effective home repair intervention called interim controls. While just at effective at protecting children from lead hazards, a lead safe approach is more reasonable and scalable. A lead safe approach, generally, does not require a tenant to leave the premises while home repairs are taking place. In line with our expectations, as of now, [the Lead Safe Cleveland Coalition](http://www.leadsafecle.org/) nor the Lead Safe Advisory Board are reporting any significant displacement concerns. The City of Cleveland and members of the Action Boards are aware of no significant displacement concerns.

The Lead Safe Advisory Board – another body created by the Ordinance 747-2019 – is charged, in part, to monitor any unintended consequences caused by the Lead Safe Certification. The Lead Safe Advisory Board began meeting in 2021and includes representatives from the Lead Safe Cleveland Coalition, community members, landlords, City Council, and the Lead Safe Auditor. The Lead Safe Auditor - a position created by the Ordinance 747-2019 – provides quarterly and annual reports on the Lead Safe Certification and other important data measures. Case Western Reserve University Poverty Center serves as the current Lead Safe Auditor.

*For additional information on the “lead safe approach,” the Lead Safe Cleveland Coalition, and the Lead Safe Advisory Board, please see the appendix.*

**Monitoring of the Displacement Issue**

Through the work of Case Western Reserve University, the community has a vivid [profile of Cleveland’s property owners](https://case.edu/socialwork/povertycenter/sites/case.edu.povertycenter/files/2020-10/Landlords_09022020r_accessible%20%281%29.pdf) as well as a deep understanding of the [downstream effects of lead poisoning](https://case.edu/socialwork/about/news-publications/study-downstream-effects-childhood-lead-poisoning-reveals-racial-economic-disparities-adulthood). This research sets helpful context to understand and monitor the issue of displacement.

In early meetings, Case Western Reserve University Poverty presented to the Action Board. They summarized their existing research and offered a glimpse into what they are tracking for the Lead Safe Advisory Board and for the general public. Data being collected includes, but is not limited to, tracking housing insecurity and eviction filings at both the parcel and property owner level. These data are all publicly available and updated quarterly on the [Lead Safe Cleveland Coalition Dashboard](https://cwru-urb-pov.shinyapps.io/lscc_data_dashboard_beta/).

In addition to the data-based approach to monitoring for displacement, there is a person-based approach. The Action Board knows of three current systemic ways, on a person-to-person level, where displacement is being monitored.

First, the Lead Safe Advisory Board mentioned above established a public comment online portal. This online portal, which is essentially an ombudsman feature, captures any and all input related to lead poisoning and the Lead Safe Certification, including displacement.

Second, the Lead Safe Resource Center captures concerns and questions related to lead poisoning prevention from the community. The Lead Safe Resource Center is an extension of the Lead Safe Cleveland Coalition. It manages and directs community outreach and engagement related to lead poisoning. It does so through neighborhood canvassing, community events, and a hotline phone number.

Third, the Lead Safe Cleveland Coalition, primarily through its website: [www.leadsafecle.org](http://www.leadsafecle.org/), can collect feedback and concerns about displacement. The website had a feature to submit comment that comes directly to the Coalition for response.

Despite these current data-based and person-based approaches to monitoring displacement, there a good deal of room for development. For example, the data sources currently available to and tracked by Case Western Reserve University will not and cannot sufficiently track more nuanced rental housing issues, like displacement. The following questions remain difficult to answer through currently available data sources: how do we track rent increases or landlord pressure without having an eviction filing?

Qualitative, person-based monitoring is a strong form of monitoring, but it is not done uniformly across all entities nor well-advertised. Further, for maximum effectiveness many more entities should participate in a uniform screening process to identify at-risk and active displacement.

Case Reserve Western University and the Action Board agreed that our community needs stronger metrics to understand how much, if any, displacement is occurring. This stands true for displacement caused by lead as well as other types of housing displacement. In general, this is an area poorly tracked across our community, state, and nation. In addition to tracking displacement concerns through anecdotal and organizational means, we need further data and research to be able to effectively reduce any displacement due to lead poisoning prevention efforts.

The Action Board recommends pursuing additional data-based and person-based monitoring methods but coordination among these methods is necessary. The Action Board represents many community facing initiatives that agreed to serve as part of our community’s early detection system for unintended consequences like displacement. The Action Board is committed to working with partners and clients to monitor the issue of displacement.

**Catalog of Existing Resources**

One of the most significant findings of the Action Board is that there are very limited resources currently in existence to assist families facing displacement due to lead, or frankly, due to other displacement pressures like affordability, discrimination, access to opportunity, other non-lead safety and health concerns, and neighborhood change. Nevertheless, it is important to acknowledge the resources that are available. A catalog of current resources will, hopefully, help tenant connect with resources. Further, it highlights programs that should be scaled as well as gaps in services that could be address through new programming.

First, there are a number of programs tailored not toward displacement but toward lead remediation and abatement, both for prevention and intervention after lead hazards are detected. These resources for lead remediation and abatement to avoid displacement altogether:

* [Lead Safe HYPERLINK "https://leadsafecle.org/landlords-property-owners/financial-assistance" HYPERLINK "https://leadsafecle.org/landlords-property-owners/financial-assistance"Home Loans HYPERLINK "https://leadsafecle.org/landlords-property-owners/financial-assistance", HYPERLINK "https://leadsafecle.org/landlords-property-owners/financial-assistance"Grants HYPERLINK "https://leadsafecle.org/landlords-property-owners/financial-assistance", and Incentives](https://leadsafecle.org/landlords-property-owners/financial-assistance) – Administered by the Lead Safe Cleveland Coalition, specifically the Home Loans and Grants Administration CHN Housing Partners
* U.S. Department of Housing and Urban Development Healthy Homes and Lead Hazard Control Programs - Administered by the [City of Cleveland Department of Community Development](https://www.clevelandohio.gov/CityofCleveland/Home/Government/CityAgencies/CommunityDevelopment/DivisionofNeighborhoodServices/LeadHazardControlProgram) and the [Cuyahoga County Board of Health](https://www.ccbh.net/healthy-homes/)
* Various [City of Cleveland HYPERLINK "https://www.clevelandohio.gov/CityofCleveland/Home/Government/CityAgencies/CommunityDevelopment/Comm\_Dev\_Services" Department of Community Development HYPERLINK "https://www.clevelandohio.gov/CityofCleveland/Home/Government/CityAgencies/CommunityDevelopment/Comm\_Dev\_Services" home repair HYPERLINK "https://www.clevelandohio.gov/CityofCleveland/Home/Government/CityAgencies/CommunityDevelopment/Comm\_Dev\_Services"and renovation HYPERLINK "https://www.clevelandohio.gov/CityofCleveland/Home/Government/CityAgencies/CommunityDevelopment/Comm\_Dev\_Services"program HYPERLINK "https://www.clevelandohio.gov/CityofCleveland/Home/Government/CityAgencies/CommunityDevelopment/Comm\_Dev\_Services"s](https://www.clevelandohio.gov/CityofCleveland/Home/Government/CityAgencies/CommunityDevelopment/Comm_Dev_Services)

More to the issue of displacement, there are limited number of existing resources specifically tailored for a family or individual facing displacement, whether due to lead or other non-lead causes. To the knowledge of the Action Board, we’ve identified the following resources:

* City of Cleveland [Lead Hazard Control Program](https://www.clevelandohio.gov/CityofCleveland/Home/Government/CityAgencies/CommunityDevelopment/DivisionofNeighborhoodServices/LeadHazardControlProgram) relocation assistance
* Administered as part of the City of Cleveland’s Lead Hazard Control Program mentioned above, there is a small amount of funds available for families already engaging in home repair through the City’s program. In this instance, families will have already income qualified and have a child living in the home. In general, this program (and its related temporary relocation assistance) is accessed when a family is already dealing with positive test for lead poisoning.
* Cuyahoga County [Prevention, Retention, Contingency ( HYPERLINK "https://hhs.cuyahogacounty.us/programs/detail/emergency-assistance-prevention-retention-and-contingency-program"PRC HYPERLINK "https://hhs.cuyahogacounty.us/programs/detail/emergency-assistance-prevention-retention-and-contingency-program") HYPERLINK "https://hhs.cuyahogacounty.us/programs/detail/emergency-assistance-prevention-retention-and-contingency-program" Program emergency assistance](https://hhs.cuyahogacounty.us/programs/detail/emergency-assistance-prevention-retention-and-contingency-program)
* PRC’s emergency assistance is one-time, short-time cash assistance up to $1,500 available to income eligible families facing hardship. The PRC program makes a special prioritization for families with a lead hazard control order and at 200% of FPL, among other criteria. ([*Category 2- Shelter Assistance Services*](https://jfs.ohio.gov/owf/prc/county/Cuyahogacountyprc.pdf) *for families that are seeking assistance for shelter costs limited to rent and/or security deposits, utility payments (Lead Poisoning Program ONLY))*
* [Emergency Rental Assistance](https://chnhousingpartners.org/rentalassistance/)
* During the Covid pandemic, the need for emergency rental assistance peaked. Unprecedented federal dollars flowed to state and localities, much of which was either expressly for or allocated toward rental assistance. In Cleveland and Cuyahoga County, a new, coordinated rental assistance program was established. Administered by either CHN Housing Partners, EDEN, or Step Forward, there are a number of organizations a resident facing eviction, displacement, or other rental housing cost burdens can contact for assistance. CHN serves as the entry point for Rental Assistance, screening all applicants. The online application portal, [www.neorenthelp.org](http://www.neorenthelp.org/), is in both English and Spanish and the toll-free number, 833-377-RENT, is staffed with bilingual intake specialists. All applicants are screened for utility assistance programs, and priority is given to tenants already in the eviction process.

The lack of existing resources for displacement underscores a much larger issue - There is an overall shortage of safe decent housing, which includes families facing displacement from lead. The Action Board consists of organizations attempting to address this gap through policy, production, access, and preservation of affordable housing. Per our statutory charge of “maintaining a list of housing units available for families forced to relocate and providing help with problems that arise as a result of forced relocation,” we’ve included these existing resources here and recommend an expansion of these programs as well as an exploration of new pilot programs to adequately address displacement and, ultimately, housing insecurity.

**Pilot Program Ideas**

The Action Board recognizes two realities: 1) There is an overall lack of resources for affordable housing, and 2) There are specific a lack of resources and systems to address current and potential displacement due to lead. With these realities in mind, the Action Board developed four pilot program ideas to support tenants, and some homeowners, facing displacement. These pilot programs would support families who must relocate due to lead as well as allow our community to measure demand/need and right-size assistance. It is important to note that these pilot programs would be not replace any of the existing programs listed above. Those programs, particularly for this with Lead Hazard Control Orders, are the primary resources and these pilot program would be supplementary.

As the entirely new Lead Safe Certification system launches and the issue of displacement either does or does not emerge, we need to prepare to respond and scale. These pilot programs would allow us to do just that – respond and, if necessary, scale. Lead safety is paramount, but it cannot be at the cost of housing stability. These pilot programs are modest solutions to that challenging problem.

The Action Board debated the scope of the pilot programs. Some members advocated for the pilots to strictly address the potential displacement related to Lead Safe Certification. Other members rightly pointed out that statutory charge of the Action Board includes support of families who must relocate as a result of a “lead hazard control order, lead safe maintenance or lead poisoning,” which is more expansive.

Ultimately, the pilot program ideas and their respective scopes will be driven by available resources and implementation constraints. If the scope of any particular pilot program is too broad, we risk being overwhelmed with requests and losing the opportunity to test pilot programs to identify the appropriate scale. However, if the scope of any particular pilot program is too narrowly tailored around displacement due to the Lead Safe Certification, we would forgo assistance for families already dealing with the crisis of lead poisoning. On one hand, there are currently over 1,000 families with EBLLS so pilots to assist them would be a considerate increase in scope. On the other hand, the only clear, documented displacement need in the community is from those families with EBLLs and, subsequently, lead hazard control orders.

The eligibility for each of these pilot programs must be carefully considered. It is possible that all the pilots could be self-selected, based solely on low-income and indication of need. In fact, the Action Board recommended that the only demographic-based eligibility requirement be income (not, for instance, family composition, geography, etc.) It is also possible to extend the support to homeowners, with the recognition that assistance with permanent relocation would likely be for rental housing.

As discussed earlier in this report, the pilot program scopes should contemplate encompassing Lead Safe Certification non-compliance as well as at-risk for displacement. If a tenant believes that their unit or property poses a credible lead hazard, or if a tenant believes they are at risk of lead poisoning, the Action Board recommends that at least one or more of the pilots will be structured to support those tenants with a relocation.

For all the pilot programs, the Action Board recommends that the City of Cleveland analyze and adapt the Uniform Relocation Act (URA), a federally mandated system that already exists for homeowners facing displacement. The Uniform Relocation Act offers a way of proceeding once a family deemed eligible for assistance. The Action Board believes that we do not need to reinvent a new relocation system. Instead, we should take the pieces form the URA.

**PILOT PROGAM IDEA 1: Lead Safe Cleveland Coalition Stipend**

With funding support from the City of Cleveland and other sources, a stipend/subsidy for temporary relocation would be available through the Lead Safe Cleveland Coalition. Modelled largely after the City of Cleveland Lead Hazard Control Program relocation assistance, the stipend would operate as a limited pilot program to those individuals and families engaged in the Lead Safe Home Loans and Grants program. If a certified lead safe worker, vetted by the Coalition, develops a lead remediation scope of work that requires temporary relocation, then affected families could request this stipend. The pilot would monitor need and evaluate the effectiveness of a more proactive, liberal approach to displacement assistance.

Since this pilot is a general, flexible subsidy, is critical that eligibility not be tied to any subjective value statement about who is at need. The Action Board recommends a rigorous commitment to first-come, first-serve where all applicant and client data is carefully collected to contribute toward an overall community demand analysis.

* Pilot Budget: $25,000
* Number of Families Served by Pilot: 41
* Elements of Relocation Stipend - $600 per household\* (scaled based on household size i.e. $50 per additional person)
* Stipend to stay with family members during lead remediation, if necessary. Covers reasonable out of pocket expenses.
* Select a decent safe hotel from list provided by Cleveland Department of Public Health ($120 per night max)
* Secure a lead safe rental unit from list of affordable housing providers
* Require Administrator to inquire as to lead safe status of temporary housing accommodations

\*This subsidy amount and options 1 +2 are in accordance with City of Cleveland Community Development temporary lead relocation process. Family required to be out of the property for the full duration of remediation and clearance.

* Process + Eligibility: Based on household income and demonstrated need with first-come first-serve basis
* Possible Administration: Lead Safe Home Fund Administrators: CHN Housing Partners and/or Environmental Health Watch.

**PILOT IDEA 2: Master Lease with Housing Provider(s)**

With funding support from the City of Cleveland and other sources, a master lease with one or more housing providers would “hold” available, decent, safe units for temporary location. The master lease would set aside two market rate units to provide a year-round temporary space for displaced families impacted by lead remediation or abatement efforts. Families could stay through completion of remediation or abatement work, up to 6 months. The selected housing provider(s) would be responsible for establishing a process to identify what is included in a family support subsidy. The selected housing provider(s) must be chosen with unit bedroom size and location in mind. Units with multiple bedrooms must be available to families. Units must not be geographically concentrated but be available in different locations across the city.

The pilot program would also address a need expressed by affordable housing providers – a need to provide “flex space.” Current systems incentivize all properties to be rented but this pilot program serves as an opportunity to create much needed slack in the overall affordable housing ecosystem.

* Budget: Annual master lease amount of $150,000, for each unit, for rent, initial capital costs (including furnishings so units will be “move-in ready”), unit turnover, and family support subsidy costs.
* Number of Families Served by Pilot: 4-12 families per unit, depending on duration of stay.
* Elements of Support Subsidy: Increasing amounts based on family size, but includes:
* Transportation costs (to job, school, etc.)
* Cost for meals
* Moving costs
* Support services to maintain school district and address any other unforeseen consequences of displacement
* Process + Eligibility: Income based eligibility with priority for families with children with EBLLs
* Potential Administration: City of Cleveland could partner with affordable housing providers with existing mixed-income, multi-unit buildings with vacant units. Units must be current on its Rental Registration as well as Lead Safe Certification.

**PILOT IDEA 3: Land Bank Homes**

We encourage the City of Cleveland to work with the City of Cleveland Land Bank and the Cuyahoga County Land Bank to identify and designate at least two homes that could be acquired and permanently used as “swing spaces” that are available to families facing displacement. Land bank homes could be well-suited to larger families or families facing long-term, but still temporary, displacement due to longer lead remediation or abatement efforts. Families could stay through completion of abatement work, up to 12 months. This pilot offers the rare opportunity to monitor the interest and ability to transition families from temporary displacement into permanent relocation. As a part of the pilot program, the administering entities would model the possibility of turning this into a long-term rental or homeownership pipeline.

This pilot program would take advantage of existing, but unused housing stock in the same neighborhoods impacted by lead. For example, there are 127 land bank homes in the Glenville neighborhood.

The pilot program, in our assessment, would require the land bank to identify a third partner to serve as a property manager.

* Estimate Budget\*: Initial $500,000, including front end capital investments like home repairs and furniture purchases and an annual amount of $150,000 for mortgage and taxes, maintenance, turnover costs, family support subsidy, and property management.
* A*ctual budget would be dependent on Land Bank properties and processes as well as identified property management costs.*
* Number of Families Served: 2-12 families per unit, depending on duration of stay.
* Elements of Support Subsidy: Increasing amounts based on family size, but includes:
* Transportation costs (to job, school, etc.)
* Cost for meals
* Moving costs
* Support services to maintain school district and address any other unforeseen consequences of displacement
* Process + Eligibility: Income-based eligibility
* Potential Administration: City of Cleveland could partner with the City of Cleveland Land Bank and/or the Cuyahoga County Land Bank or other entities, such as CDCs, with an existing stock of vacant/abandoned homes. Depending on the partner and administering entities, a separate property management entity would needed to be identified and engaged. Units must be current on its Rental Registration as well as Lead Safe Certification.

**PILOT IDEA 4: Permanent Relocation Assistance / Housing Navigation**

We encourage the City of Cleveland to work in conjunction with Cuyahoga County to identify and designate community agencies to help families relocate a comparable unit in the event of permanent relocation. Similar to the centralized intake process for families and individual facing homeless, this pilot program would be more “upstream” in addressing the housing needs of tenant. In other words, this pilot program would intervene before a family faces eviction or has to access an emergency shelter. This pilot program would support specialists who screen for need and, as necessary. Specialists would work directly with families as well as with private market property owners to build relationships and a database of accessible, safe, and affordable housing options.

Existing housing providers often serve in this type of ‘housing navigator concept” but it is limited to within their own organizations. This pilot program is an opportunity to cultivate untraditional housing partners who do housing navigation work. For example, there are community organizations focused on assisting special populations like refugees or survivors of domestic violence, and often navigate families toward housing.

This pilot would identify a process by which a comparable new home can be found for family leaving an unsafe, owner-occupied home. This pilot would also identify a process by which permanent relocation needs takes place without sending an homeowning family through coordinated intake.

Finally, it is critical this the resources available through this pilot program, and its eligibility, be weighed against the other recommendation pilot program. The Action Board is concerned that residents facing displacement will overwhelm this particular resource because they prefer to move permanently. The resources in this pilot program, like the support subsidy, need to be scaled appropriately to ensure that does not happen. Further, there could even be consideration for how to make this pilot program the option of last resort. This would likely mean incentivizing the other recommend pilot programs more deeply. It would also likely mean ensuring that families access this pilot only after proof of exhausting the potential of the other pilots.

* Budget: Annual amount of $250,000 would include administration support for two specialists and family relocation subsidies.
* Number of Families Served: Based on need
* Elements of Relocation and Support Subsidy: Subsidy would be available to a family if they are if working specialist and that specialist determines that a relocation and/or other supports are necessary. Increasing amounts based on family size, but includes:
* Moving costs
* Support to find new schools, jobs as necessary
* Down payment assistance or rent deposit assistance
* Partial rental assistance or mortgage assistance, up to 6 months
* Process + Eligibility: Income-based eligibility, with priority for families with children
* Potential Administration: City of Cleveland could work with existing community agencies who interface with residents and/or relocate and place families in private market units. Units must be current on its Rental Registration as well as Lead Safe Certification.

**Recommendations to the City of Cleveland**

* **Improve monitoring of current and potential displacement**: In partnership with Lead Safe Advisory Board and the Lead Safe Action Board, the City of Cleveland should consider investing in data-based and people-based approaches to more accurately, more systematically, and more regularly monitor displacement. Better monitoring includes:
* Expanding the Lead Safe Auditor’s scope to identify and publicly report on levels of displacement from the Lead Safe Certification. Consider adding additional resources to support qualitative data collection, research on homeowners with Lead Hazard Control orders, and monitoring children with EBLLs.
* Establishing a City of Cleveland point of contact for reporting displacement concerns
* Regularly reconvening to the Lead Safe Housing Action Board to analyze data provided by the Lead Safe Auditor.
* Supporting the Lead Safe Resource Center and other pertinent organizations such as the Cleveland Department of Public Health, Legal Aid Society of Cleveland, United Way 2-1-1, City-Council Homeless Coordinated Intake, in establishing standard screening questions for tenants facing current OR potential displacement due to lead.
* **Expand existing resources:** The City of Cleveland should consider investing in existing programs addressing displacement and relocation of all types. In other words, there needs to be additional investments to address increasing housing insecurity in our community. These investments would include:
* Creating a permanent rental assistance program that can continue to make emergency assistance available and consider prioritizing assistance for displacement.
* Advocating that the State of Ohio and Cuyahoga County allocate additional Temporary Assistance for Needy Family (TANF) funds toward the PRC program to both expand its capacity and eligibility related families facing displacement due to lead.
* Through the Department of Public Health, expanding use of its statutory nuisance authority (*Cleveland Codified Ordinance 240.02(d)*) to require property owners to cover costs and expenses of a tenant’s relocation.
* Supporting community legal advocates and the City of Cleveland to pursue existing tenant protections, like a rent strike, to incentivize non-complaint property owners to comply with Lead Safe Certification or Lead Hazard Control Orders.
* **Launch pilot program ideas:** The City of Cleveland should consider using existing funding sources as well as currently available federal pandemic relief dollars to immediately launch the recommended pilot programs. The pilot programs will meet the current demand from Lead Hazard Control Orders with intention and ability to scale up successful pilots should the Lead Safe Certification result in additional displacement.

Federal pandemic relief funds expressly recognize lead remediation and healthy housing creation as an eligible use. Tapping traditional sources, in innovative way, is also encouraged. For example, Community Development Block Grant (CDBG) funding can pay up to three months of assistance on behalf of a family to a property owner as well as pay for other wrap around services.

Considerations when launching the pilot programs include:

* For any pilot program, the only demographic requirement of applying families should be income. In other words, geography, presence of children, unit type, etc. should not be considered.
* For any pilot program with a stipend or family support subsidy, that resource should scale up with household size
* The Lead Safe Housing Action Board is a City of Cleveland body. Our report and recommendations were developed with the City in mind. The City of Cleveland should share this report with other communities and Cuyahoga County to review and for consideration to scale up the pilot programs for their respective communities.

**Appendix**

* List of Housing Action Board Participants
* Lead Safe Approach
* Lead Safe Advisory Board
* Written comments submitted by the members of the Lead Safe Housing Action Board