

COVID-19 and Healthy Housing: Policy Action

The Challenge: Ensuring that homes are healthy and safe for vulnerable families during the COVID-19 crisis.

At this unprecedented and historic time in America, the health of our housing stock could not have greater importance or provide a greater public policy opportunity. We have asked families to shelter in place, to use housing as a shield for health. Yet through the pandemic we have once again seen the stark racial disparities that exist in our Country that are a result in large part due to generations of disinvestment and disregard of the health of housing in Black and Brown communities and low-income communities. What has been heightened by COVID-19 is the risk of sheltering our youngest and oldest populations and exposing them to greater harm from unsafe conditions in their homes from poor indoor air quality, mold, mildew and moisture, structural defects and toxins such as lead.

At the same time, the nation is at a critical inflection point on racial equity. It is our strong belief that investments at scale in improving the health of occupied housing in low income communities across the nation offers a direct investment in improving immediate opportunities and equity through better health, economic, educational and societal outcomes.

We hope this document helps to set a framework upon which federal and state policymakers can commence immediately to raise significant policy action and investment to address the toxic legacy and impediments caused by unhealthy housing and turn the corner to economic prosperity, equity and opportunity.

The Opportunity: Strengthen healthy housing policy and investment; tackle racial health inequity.

To build housing resilience now and to prepare for future emergency response, programs that address the root cause of health issues in the home are more necessary than ever. Unfortunately, due to shelter-in-place orders, funding constraints, and workforce reductions, many healthy housing programs are unable to provide their usual services. To ensure that public health services can operate effectively to fight the resurgence of COVID-19 and prevent unnecessary hospital usage, partners across sectors must work together to implement a rapid response and build long-term community resilience. Due to the racial disparities of how COVID-19 affects Black and minorities families, investment and services in healthy housing programs directly combat racial inequity that is rooted in poor housing conditions.

With the passage of The Coronavirus Aid, Relief, and Economic Security (CARES) Act and other legislation and policies undertaken law for COVID-19 emergency response, deployment of federal funding is occurring as part of the immediate response to the unprecedented health crisis. As federal, state, and

local policymakers meet the urgent call of the COVID-19 crisis, we highlight healthy housing policies that will support our nation's response to this public health emergency.

Recommendations: Federal stimulus packages

The next COVID economic relief/stimulus package should include **\$23.8 billion** in funding directed to local government, community-based organizations, and non-profits to address housing conditions that enable safe social distancing and contribute directly to long-term health and stability in their communities. This includes funding a holistic model to address the true scale of the health, safety, and energy needs in housing, targeted to areas with high rates of COVID infection and racial disparities related to COVID, as well as high rates of housing-related health conditions:

- \$100 million in support for platforms to provide a suite of virtual in-home health and safety services including healthy homes assessment, education, and hazard mitigation guidance, so that residents can access healthy homes services during the COVID-19 response.
- \$750 million for injury prevention measures in 200,000 homes to prevent costly catastrophic fall injuries among older adults.ⁱ
- \$7 billion for Weatherization Assistance Program (WAP) energy-efficiency upgrades to 1.4 million homes to lower utility bills and contribute to long term financial stability.
- \$1 billion in funding for emergency roof repairs to at least 60,000 homes, to allow families and older adults to remain safe and healthy at home.ⁱⁱ
- \$2.4 billion to improve indoor air quality in over 375,000 homes to mitigate the risk of respiratory illnesses, including asthma and allergies.ⁱⁱⁱ
- \$12.5 billion to remediate lead hazards in approximately 1,000,000 homes, including measures that contribute directly to deterioration of lead-based paint but are not included in current federal lead hazard control funding programs, such as roof repair.

Subsequent stimulus packages should build resilience for vulnerable families and strengthen our nation's housing stock through investment in the following areas.

Emergency utility support to families and guarantee no utility shutoffs

- \$5 billion for emergency relief for moratorium on water shutoffs for residential households.
- \$17 billion for the Low Income Home Energy Assistance Program (LIHEAP) to assist families with energy costs related to energy bills, weatherization, and minor energy-related home repairs.
- \$7 billion for the Weatherization Assistance Program (WAP) for energy efficiency improvements for low-income households and creation of clean energy jobs.

- \$2.3 billion for DOE’s Conservation Block Grant (EECBG) Program to develop, promote, implement, and manage energy efficiency and conservation projects and create new jobs.

Address toxic pollution

- \$522 million for EPA’s Office of Enforcement and Compliance Assurance to enforce environmental laws; \$100 million for a new program under it called the Office of Cumulative Impacts to make policy recommendations on how to mitigate legacy pollution as well as recommend and enforce civil and criminal legal actions.
- \$100 million for reinstating the Office of Environmental Justice at the EPA to administer grants to Historically Black Colleges and Universities (HBCUs), tribal colleges and other majority minority serving academic institutions with environmental and public health programs, and nonprofits working in environmental justice communities.
- \$20 billion for EPA’s Superfund and Brownfield programs with funding set aside for workforce training and renewable energy development.
- Pass the Abandoned Mine Land Reclamation Fee Extension Act of 2019 to clean up legacy mine sites that have been abandoned.
- Pass the Reclaim Act to accelerate the clean-up of abandoned coal mines while creating jobs in areas hard-hit by the decline of the coal industry.
- Pass the Environmental Cleanup Infrastructure Act to fund cleanup of orphan Superfund Sites, abandoned coal mines, defense and former atomic energy sites.

Recognize the human right to clean, safe, and affordable drinking water and wastewater services for all

- Reauthorize the Clean Water State Revolving (CWSRD) Loan Fund and funding it at the levels in H.R. 1497 the Water Quality Protection and Job Creation Act.
- Increase funding for the Drinking Water State Revolving Loan Fund to \$2 billion and require states to use twenty percent of their capitalization grant to provide grants, negative interest loans, and forgiveness of principal for small and disadvantaged communities.
- Address lead in drinking water by passing several provisions: S.1583 - Lead-Safe Housing for Kids Act of 2019; S. 2087- Get the Lead Out of Assisted Housing Act of 2019; S. 2086- National Opportunity for Lead Exposure Accountability and Deterrence Act of 2019; S. 1613- CLEARR Drinking Water Act of 2019.

Create Economic Opportunity for All

- \$5 billion to bring people of color and low-income people into new environmental careers across four programs: 1) the EPA Brownfields Environmental Workforce Development and Job Training grants program; 2) the Environmental Health Sciences Environmental Career Worker Training program ; 3) WIOA investments directed at water sector employment training and low income youth; and 4) set aside one percent of any new water infrastructure investments to develop people of color workers and firms to participate in water infrastructure development.
- \$100 million for EPA’s Diesel Emission Reduction Grant program; \$500 million for the Federal Transit Administration’s (FTA) Low or No Emission Vehicle Program.

Recommendations: Federal policies

GHHI urges federal policymakers to advance critical policies to strengthen healthy housing in response to COVID-19 using the following mechanisms.

Weatherization and Energy Efficiency Programs (DOE)

- **Carbon monoxide detector installation:** Immediately require installation of working CO detectors and smoke alarms within safety guidelines, at a cost of \$80 million.^{iv}
- **Window replacement under WAP:** DOE should allow WAP to use available funds to replace leaded windows with lead free Energy Star windows and account for the benefits of replacing leaded windows in the Savings to Investment Ratio (SIR). Window replacement does not produce enough energy savings (and thus SIR) to be included under the WAP program; however, including the present value of non-energy benefits of lead poisoning prevention from window replacement would more than meet an SIR threshold.
- **LIHEAP home assessment:** Require the receipt of Low-Income Home Energy Assistance Program (LIHEAP) funds to trigger an environmental health and energy home assessment.
- **Increase allowable WAP funding for health and safety measures:** Expand the eligible dollars for health and safety repairs under WAP to 20% or more to support sustainability of energy measures.

Department of Housing and Urban Development, Centers for Disease Control and Prevention (HUD, CDC)

- **Title X requirements for lead assessments and testing:** Revise Title X to mandate that that lead risk assessments and testing be performed in pre-1978 properties in paint, soil, and water prior to sale of any property not previously determined to be lead free under the Lead Paint Disclosure Law and expand eligible HUD grantees to include nonprofit organizations.

- **Secondary lead poisoning prevention:** Require that any state or local government receiving CDC or HUD lead poisoning prevention funding provide secondary lead poisoning prevention services, including environmental investigation and medical case management, to children at the CDC reference blood lead level (or lower) and have a written 5 year plan to eliminate lead poisoning.
- **Homeowner tax credit:** Adopt a Federal Lead Safe Income Tax Credit for homeowners performing lead hazard control for paint, water, and soil for up to \$10,000 per household.
- **Affordable financing for qualifying property owners:** Incentivize investment in lead-based paint remediation by creating a low or no interest loan program broadly accessible to property owners with lower credit ratings and less access to traditional sources of capital, including expanding allowable home repair costs within HUD's 203(k) mortgage assistance program, and include lead risk assessments in the allowable costs for mortgage financing.
- **Asthma-friendly housing maintenance standards:** Establish a required asthma friendly standard for public and federally assisted housing maintenance standards and provide opportunities for a resident led Community Health Worker program at each project site.

Centers for Medicare & Medicaid Services (CMS)

- **Lead remediation as a Medicaid covered service:** Include lead hazard remediation as an eligible Medicaid-covered service in the homes of children and pregnant women identified with blood lead levels at or above the CDC reference level, and for primary prevention of elevated blood lead levels.
- **Environmental assessment as a Medicaid covered service:** Include environmental assessment of homes as a covered benefit for all Medicaid recipients with asthma or other respiratory conditions that could be impacted by the home environment.
- **Fall prevention measures under Medicare:** Include fall prevention remediation measures such as installing grab bars as an allowable use of Medicare funds for any at risk Medicare recipient.

Other Federal Policy

- **Community benefit expenses to cover healthy housing expenses:** The Internal Revenue Service (IRS) on Form 990, Schedule H, should specify remediation of home-based lead paint, water and soil hazards, the reduction of environmental asthma triggers in the home and home-based fall prevention measures as eligible and encourages expenditures in Financial Assistance and Certain Other Community Benefits at cost.

- **CDBG scope of services:** Determine asthma trigger reduction, such as mold remediation and IPM to be an allowable use of CDBG funds.
- **Require lead inspections and service line replacement in federal home and mortgage programs:** The Federal Housing Finance Agency, the US Department of Housing and Urban Development and its Federal Housing Administration, the US Department of Agriculture, and the Veterans Administration should require the following: lead inspection; lead hazard remediation and certification of lead safety, including addressing lead-based paint and soil hazards; and full lead service line replacement on all federally owned homes and homes with federally supported or insured mortgages.

Recommendations: State and local policies

State and local policymakers manage federal programs and have their own budgets to draw from to carry out healthy housing programs. They can leverage policies to build housing resilience in response to COVID-19.

- **Increase allowable WAP funding for health and safety measures:** Negotiate with DOE higher rates of spending on health and safety measures that could prevent hospitalizations due to issues like asthma, lead poisoning, or falls. Current cap for health and safety spending for WAP is capped at 15%.
- **Establish trust funds dedicated to the remediation of poor housing quality:** Funds can be financially self-sufficient through registration fees and enforcement (e.g. lead poisoning prevention fund supported by rental registry and certification program).
- **Virtual models:** Support state and local healthy housing programs in adopting virtual platforms and service delivery models for remote home assessment and video-enabled home visiting.
- **Workforce development:** Strengthen healthy housing workforce capacity through policies for new contractor recruitment, job-bundling for contracting efficiency, establishing pre-approved contractor pools, training subsidies for new contractors, and integrating workforce with non-traditional contractor backgrounds.

The country is looking to policymakers to ensure that we come back from the COVID-19 pandemic stronger and more resilient to future public health crises. This is especially important for low-income and underserved communities, for whom COVID-19 has exacerbated the dangers of unhealthy housing through prolonged exposure to home hazards like lead, asthma triggers, trip and fall hazards, and extreme hot and cold. Policymakers must take action to strengthen and invest in the health of our nation's housing for future and current generations to come. GHHI is committed to working with policymakers and all stakeholders on this important mission.

ⁱ Based on 25% of the 800,000 annual fall-related hospitalizations that occur among older Americans. Assumes a per-unit intervention cost of \$3,750. Annual falls data from: Kaul, K. (2019, June 3). American Seniors Prefer to “Age in Place”—But What’s the

Right Place? [Blog post]. Urban Institute. Retrieved from <https://www.urban.org/urban-wire/american-seniors-prefer-age-place-whats-right-place>

ⁱⁱ Based on 1% of all homes that have a roof-related leak. Assumes a per-intervention cost of \$16,667. Data from: U.S. Census Bureau, American Housing Survey. (2017). Table: National, Housing Quality, All Occupied Units.

Retrieved from: https://www.census.gov/programs-surveys/ahs/data/interactive/ahstablecreator.html?s_areas=00000&s_year=2017&s_tablename=TABLE5&s_bygroup1=1&s_bygroup2=1&s_filtergroup1=1&s_filtergroup2=1

ⁱⁱⁱ Based on 10% of all homes that have mold. Assumes a per-intervention cost of \$6,250. Data from: U.S. Census Bureau, American Housing Survey. (2017). Table: National, Housing Quality, All Occupied Units. Retrieved from:

https://www.census.gov/programs-surveys/ahs/data/interactive/ahstablecreator.html?s_areas=00000&s_year=2017&s_tablename=TABLE5&s_bygroup1=1&s_bygroup2=1&s_filtergroup1=1&s_filtergroup2=1

^{iv} Environmental Protection Agency, 2020. Available: <https://www.epa.gov/indoor-air-quality-iaq/where-should-i-place-carbon-monoxide-detector>