



Elimination & Beyond: *Remaining Lead Challenges and Integration into Healthy Homes*

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Substantial Progress Made in Lead...

- Nationally and in most states, lead levels continue to decline
- Title X created comprehensive regulatory framework for lead that has been widely implemented, both federally and by states
- The implementation of the RRP rule will close one of the largest gaps in lead policy



...So when are we done?

- CDC defines elimination as zero percent of children aged 1 to 6 years had blood lead levels exceeding 10 based on NHANES
- States and localities have other definitions
- Many strictly numerical – others more processed based definitions

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What Makes Lead a Public Health Problem?

- What makes it a public health concern opposed to a medical concern?
- What makes it worthy of public investment?
- Why track it more than other conditions?
- When elimination is declared, do most or all of these reasons no longer apply?

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Challenges to Elimination: Lower Levels of Concern (Facts)

- CDC lowered level of concern 4 times since 1960s – 10 $\mu\text{g}/\text{dL}$ was set in 1990
- Epidemiological evidence strong for ill-effects well below 10 – threshold of effect not well identified
- Modeling IQ loss from Pb based upon recent research shows bulk of population IQ loss occurs from levels below 10
- Dropping level to 5 may increase number of kids over level of concern by 4 or 5 times or more
- Disparities lessen, but remain substantial at 5

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Challenges to Elimination: Lower Levels of Concern (CDC)

- CDC refuses to lower level based on lack of clinical interventions, laboratory testing issues, and lack of any “safe” level
- CDC emphasizes level not intended to be a safety threshold; yet widely interpreted as such and continues to define metrics of lead exposure
- CDC prohibits using its grants for case management, etc at levels below 10

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Challenges to Elimination: Lower Levels of Concern (Local)

- States and localities have explored lower levels of concern
- Cleveland & Cuyahoga County amongst pioneers of using 5 µg/dL as standard
- Chicago, Vermont, others use 5 µg/dL as official threshold; efforts in NY State & elsewhere to eliminate 10 as normal on lab reports
- Given state of knowledge, is an elimination goal based on 10 result in true elimination?

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Does Everything Have Lead???



Challenges to Elimination: Non-Paint Lead Sources (Background)

- Toys, jewelry, candy, lunchboxes, synthetic turf, supplements and many other consumer products gained publicity
- Acute hazards documented, but increasingly documenting consumer products in EBL investigations
- Even if not primary source, products may add to body burden and background levels
- Alternatives to lead generally available

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Challenges to Elimination: Non-Paint Lead Sources (Policy)

- FHSA, FFDCRA required proof of hazard, not just application of standard, making regulation difficult
- Recent CPSC Reform legislation helps with toys and children's products
- Difficult to enforce, especially on imports
- Awareness amongst importers, retailers, public may help
- To what extent should non-paint sources be considered when looking at elimination?

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Challenges to Elimination: Dust Clearance Standards

- The widely used standards of 40 $\mu\text{g}/\text{ft}^2$ for floors and 250 $\mu\text{g}/\text{ft}^2$ for windows were a compromise between health effects and practical considerations, even based on a BLL of 10
- A health based standard would likely lower these levels substantially
- Should elimination plans require health based standards?

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Challenges to Elimination: Housing Policy (Prevention)

- In nearly all jurisdictions, lead policy is reactive rather than proactive
- Few home buyers take advantage of pre-purchase inspection option allowed by federal law
- Few private sector incentives for assessing presence of lead (in many cases, perverse disincentives for lead knowledge)

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Challenges to Elimination: Housing Policy (RRP)

- RRP closes a substantial loophole in lead policy, however huge challenges remain in implementation
- Rule doesn't go in effect until April 2010
- Training 200,000+ contractors major challenge
- Enforcement – verifying contractors use containment, LSWP requires on the ground personnel
- Can elimination be reached with substantial policy changes remaining?

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Dangers to Premature Declarations of Elimination

- Declining screening rates
- Loss of funding for remediation, case management, research
- Reduction in public & medical community awareness
- Continued, if not increased disparities
- Lack of data feeds notion of a lack of a problem
- Loss of expertise and capacity
- Increased difficulty in promoting beneficial public policy

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My View

- The mission is not accomplished, it will not be by 2010, and we should not claim it is
- Elimination discussion should be reframed in light of challenges
- Broader healthy homes concerns should be integrated

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Updating Definitions of Elimination

- Reduce threshold BLL while moving away from emphasis on blood lead levels as outcomes
- Increase emphasis on the prevalence of lead hazards in housing, using latest science to determine hazards
- Ensure protective policy is an element of elimination plans
- Include non-paint sources of lead as an element to determine success

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Continuing Forward

- While we must continue to address the lead problems, it's imperative that we move towards a broader healthy homes agenda
- Need to move beyond the notion of a zero-sum game
- Policy solutions for remaining lead challenges match many policy solutions for healthy homes

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Policy Solutions that Address Lead and Other Health Concerns

- Using health based criteria to establish standards
- Establish and enforce minimum health standards for rental property
- Avoid over-specialization and promote wide awareness across the housing industry
- Increase public awareness of the link between housing and health
- Increase coordination between agencies interacting with homes
- Engage private sector to incentivize healthy homes and create meaningful disclosures
- Measure sources of exposure not only health outcomes
- Increase funding for affordable, healthy housing

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The Importance of Partnership

- Successfully eliminating health hazards in housing requires a broad base of partnerships
- Health advocates need to talk to housing advocates
- Commercial players have a strong role and can be allies
- There is plenty of work to go around

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Thank you

I appreciate your attention and I'm happy to take any questions. Please also feel free to contact me with thoughts or questions:

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