

Lead Safe Cleveland: Update from the Lead Safe Auditor

Presentation to Cleveland City Council Committee on Health, Human Services, and the Arts

Rob Fischer, Ph.D.

Center on Poverty & Community Development, CWRU

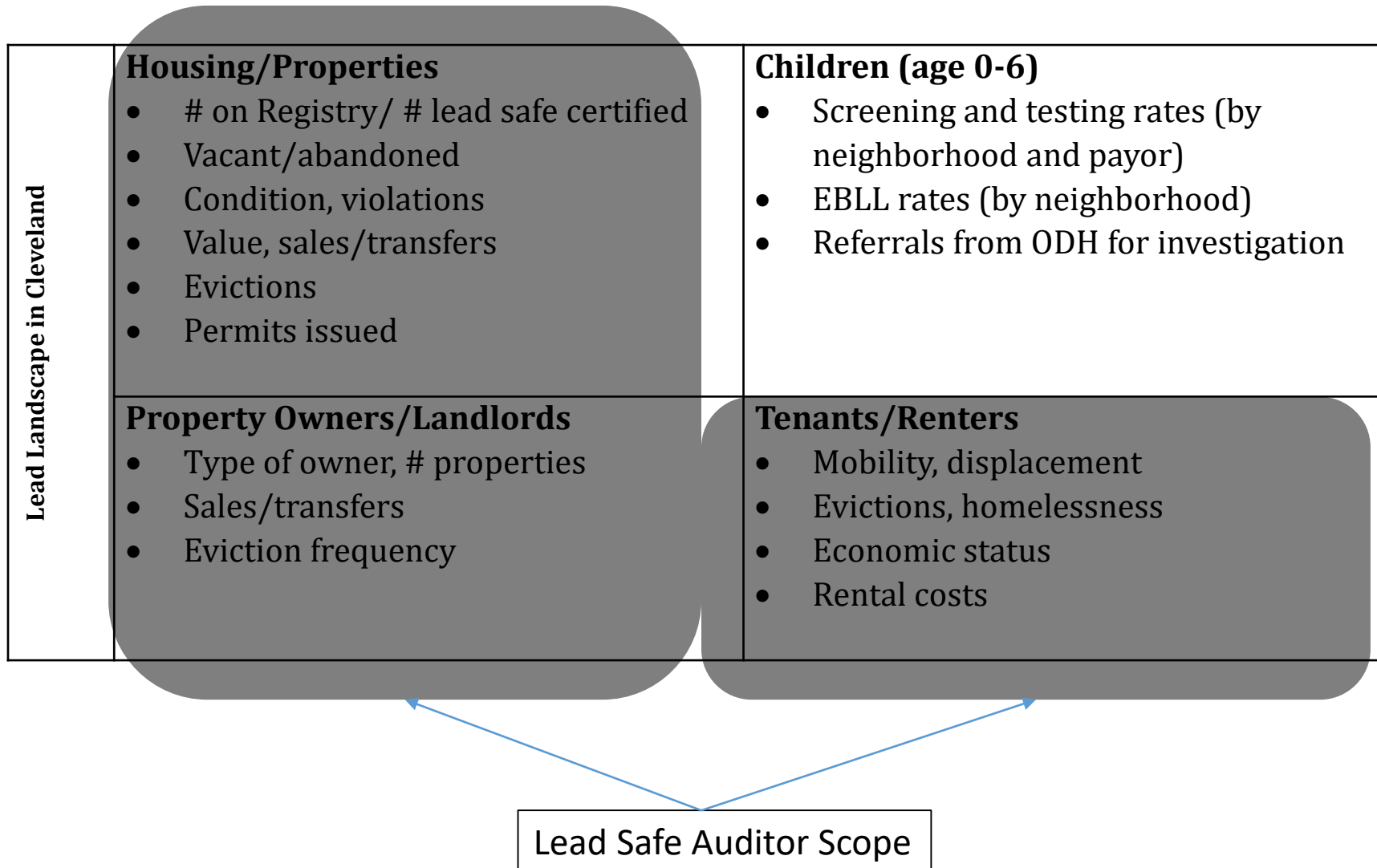
Lead Safe Auditor

January 30, 2023

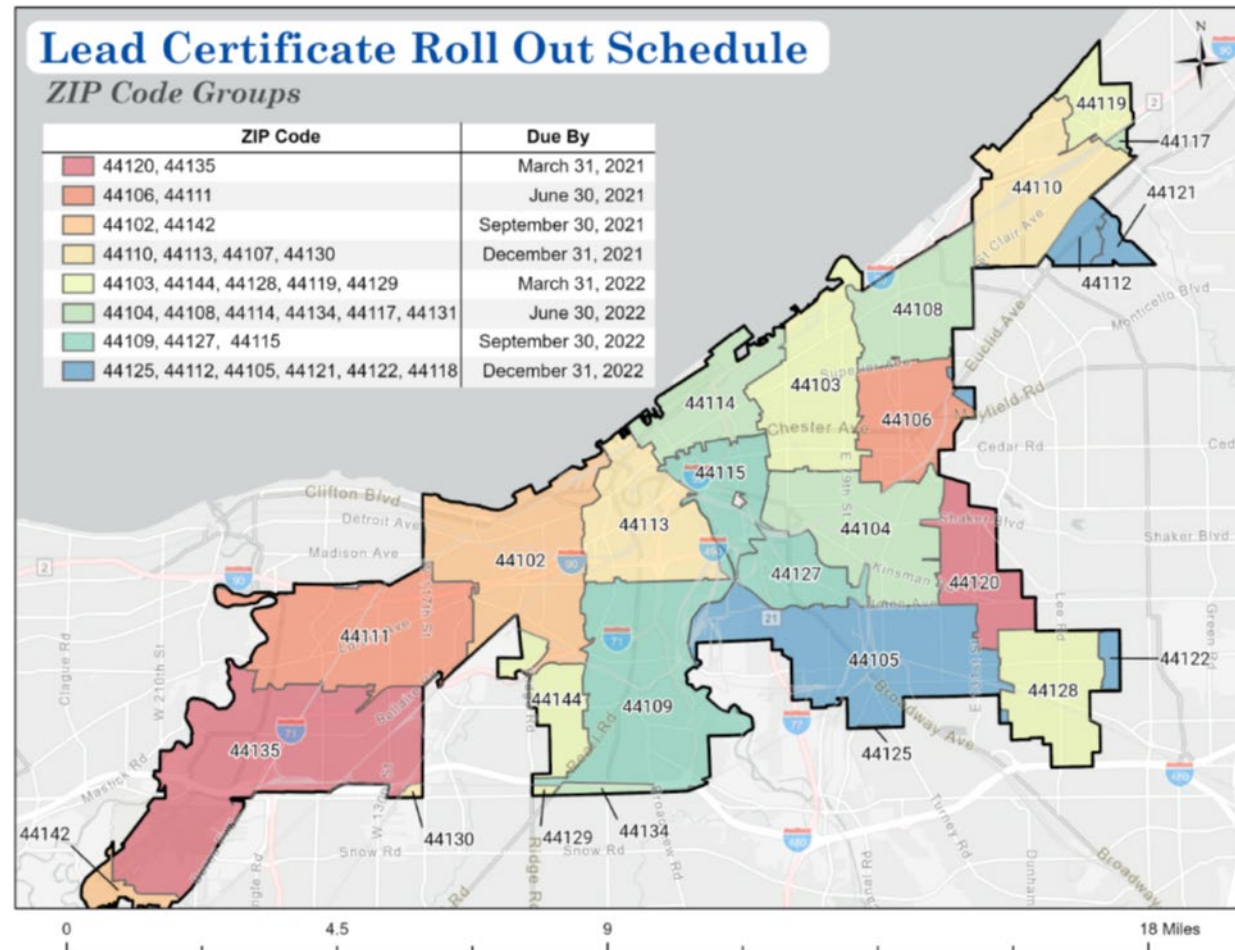
Lead Safe Cleveland

- City Ordinance 747-2019 requires
 - Appointment of Lead Safe Auditor in 2020 and creation of a Lead Safe Advisory Board
 - Certification of all rental units by March 1, 2023; impact evaluation within one year of “implementation” and annually thereafter
- The Lead Safe Auditor
 - Serves as a member of the Lead Safe Advisory Board which meets quarterly (next Feb 9)
 - Issues quarterly reports on the implementation of the certification program, receiving data from City Building & Housing
 - Annually updates the Lead Safe dashboard with data on rental properties and child lead testing
 - Manages a comment portal to collect information of unintended consequences and complaints




Measurement of Landscape



Ordinance Roll-out Zones



Rental Universe in Cleveland

	103,386 Rental Units
	54,786 Rental Properties
	36,659 Property Owners

Source: Characteristics of Rental Properties and Landlords in Cleveland: Implications for Achieving Lead Safe Rental Housing. CWRU, 2020

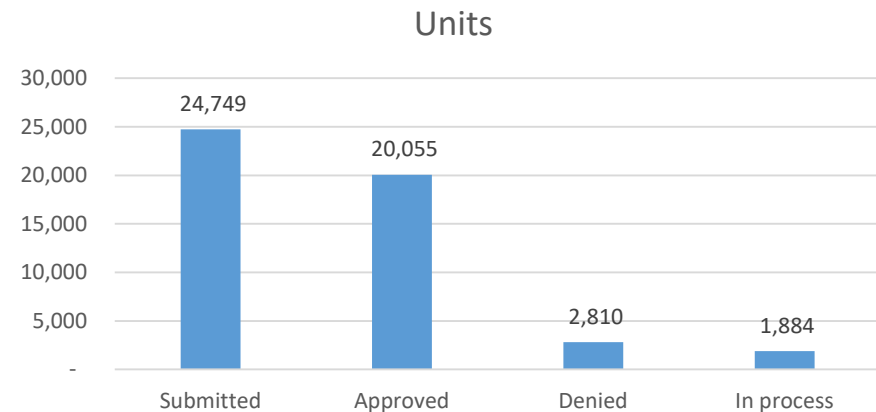
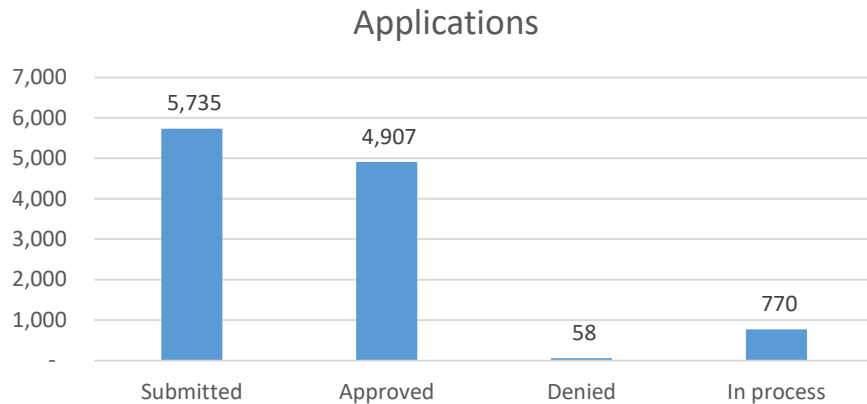
Zones 1-8 rental universe

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

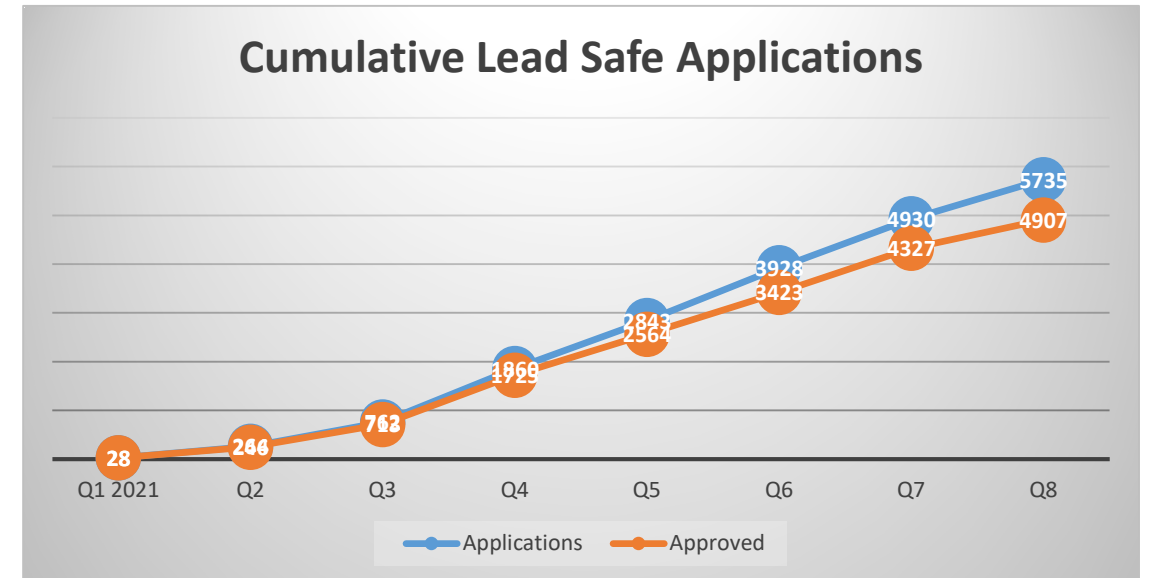
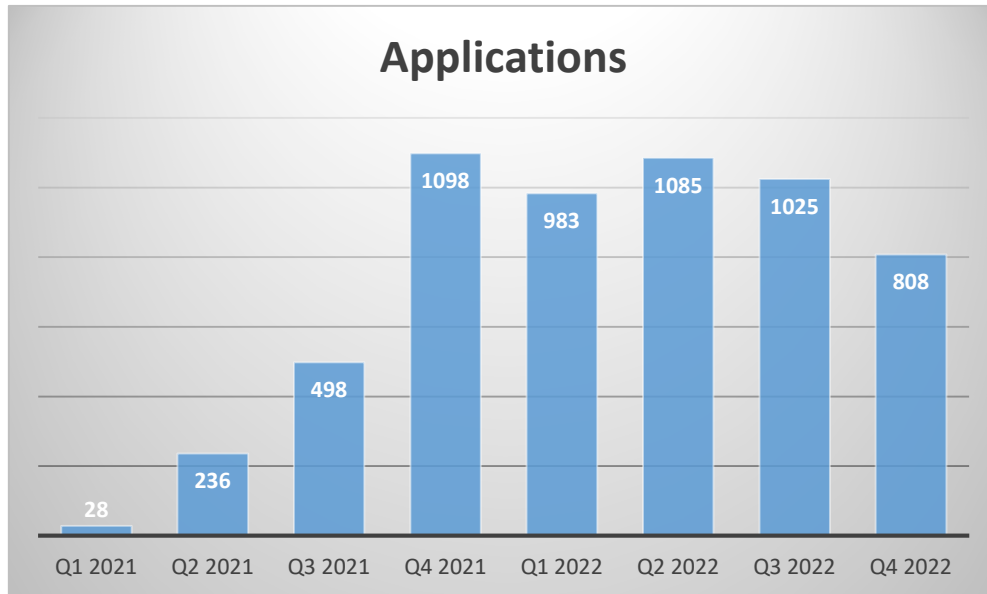
Roll-out Zone	Zip Code	Est Universe of Rental Properties	# Properties on Rental Registry 2019	# Likely Rental Properties not on Rental Registry
Zone 1	44120	4,245	1,146	3,099
	44135	3,039	1,033	2,006
	Z1 Total	7,284	2,179	5,105
Zone 2	44111	5,327	1,705	3,622
	44106	1,713	308	1,405
	Z2 Total	7,040	2,013	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
TOTAL		54,786	16,116	38,670

Thru December 31, 2022

- Submitted: 5,735 applications involving 24,749 units
- Approved: 4,907 applications involving 20,055 units
- Denied: 58 applications involving 2,810 units
- In Process: 770 applications involving 1,884 units
- 3,910 property owners have submitted applications



Lead Safe Applications Count by Month



- 5,735 applications through 12/31/22
- Avg of 1,000 applications/qtr over last five quarters
- 85% approval rate to date

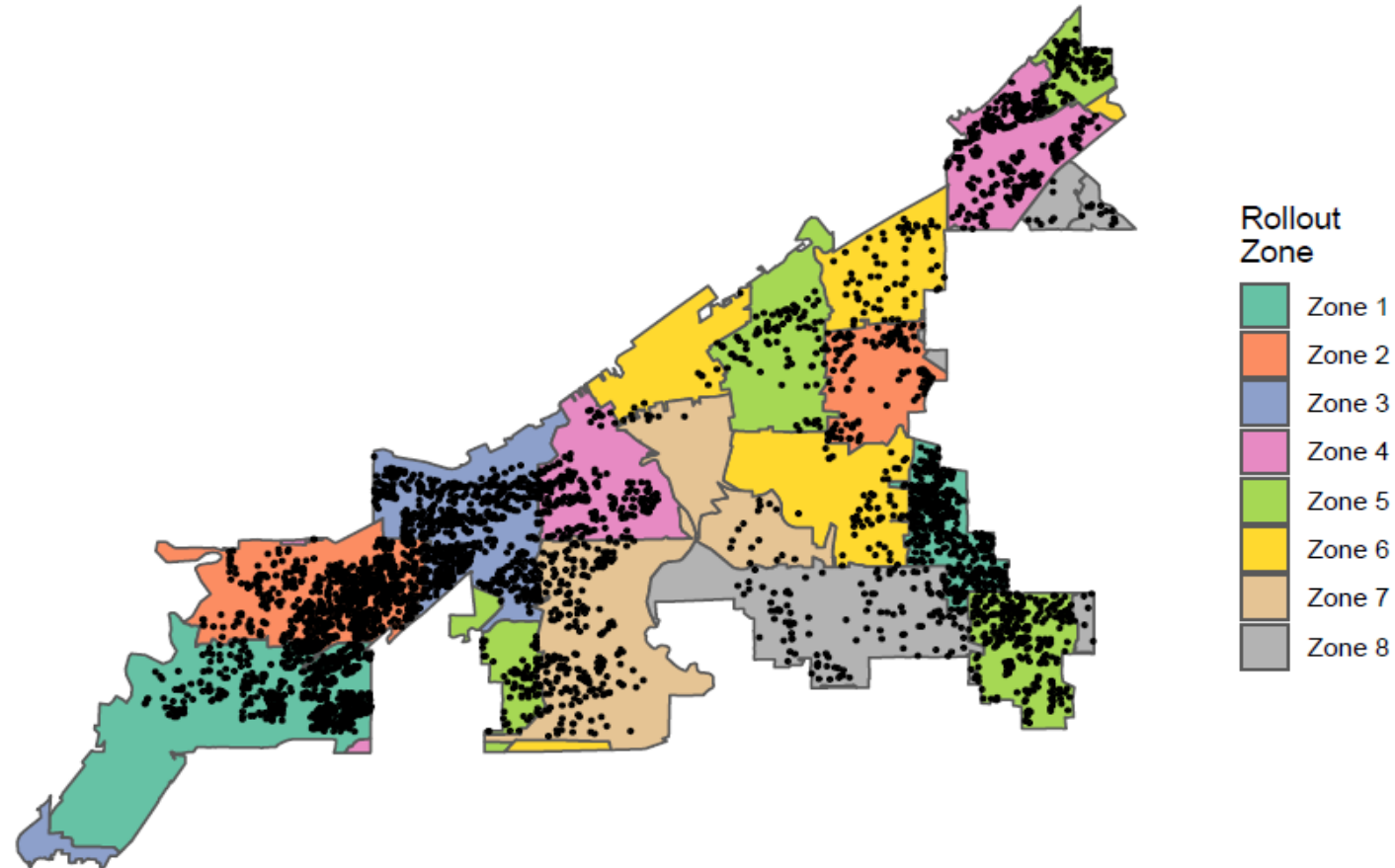
Lead Safe Applications Count by Zone (thru 9/30/22)

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 spiked in most recent 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

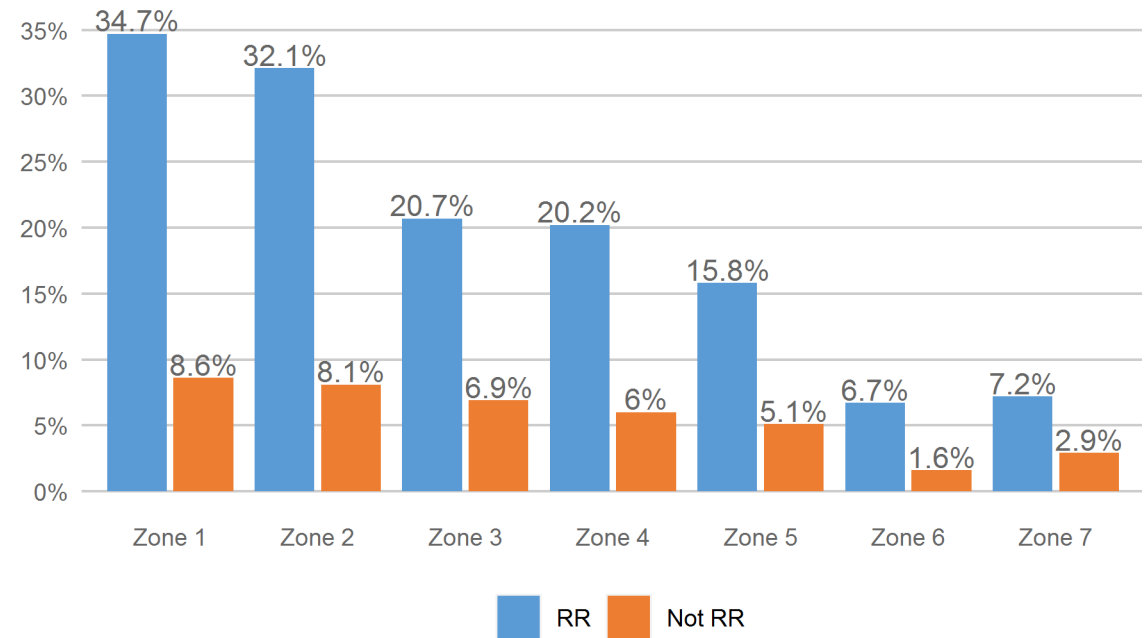
Lead Safe Certifications in Zones 1-7

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

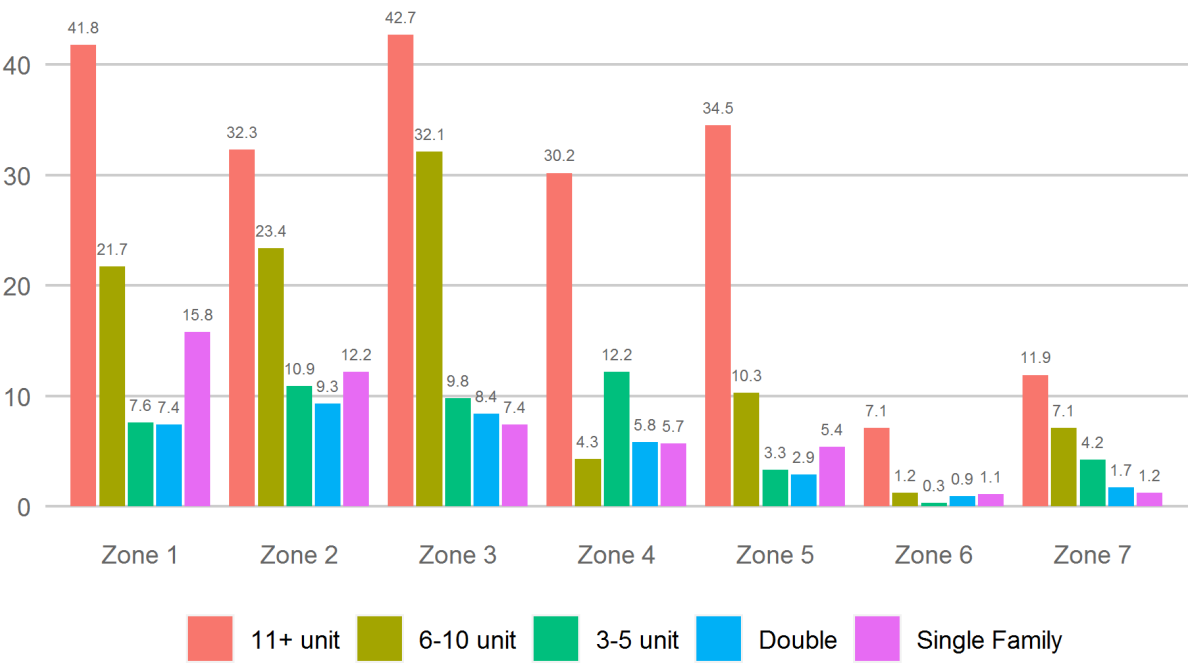


Compliance by Rental Status and Property Size

Lead Safe Certification by Sept 30, 2022



Compliance Rates by Unit Size

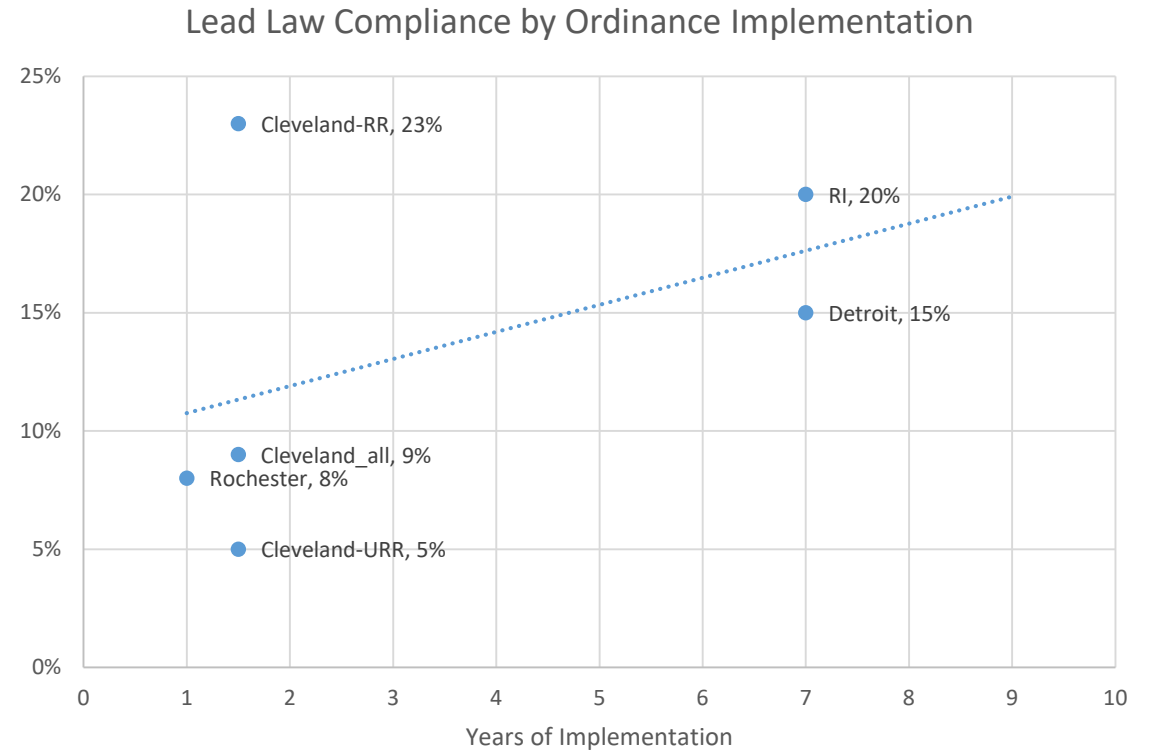


Data on Lead Safe Certification Applications

- 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

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 approx 2,500 per quarter and approx 4,000 units per quarter



Primary Conclusions

- Lead safe applications continue to grow, with the last five quarters averaging approx 1,000/mo
- 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
- Overall compliance trend in line with peer cities but well below level required to reach full compliance by 2028

More Info

- Center on Poverty & Community Development

Lead Safe Research <https://case.edu/socialwork/povertycenter/our-work/lead-safe-research>

Lead Safe Auditor <https://case.edu/socialwork/povertycenter/our-work/lead-safe-research/lead-safe-auditor>

Lead Safe Coalition Dashboard https://povertycentercle.github.io/lsccl_dashboard/

- Lead Safe Cleveland Coalition

<https://leadsafecle.org/>