

# **REPORT WRITING & NOTIFICATION**

## REPORT WRITING & NOTIFICATION

### Purpose

The results of each environmental lead investigation should be summarized in a narrative report by the authorized agent who will make notifications and follow-up on the case. The purpose of the environmental lead investigation report is to give a clear narrative description of all information learned about a child's potential lead exposures and appropriate corrective actions. It is necessary to communicate findings of the investigation to parents so they will know what is threatening their children, to property owners so they will know what hazards were found and how they can be remediated, and to physicians so they can determine whether or not a child must be removed from the home for treatment. The report provides a written record to communicate relevant information to the courts in the event that enforcement action is necessary. It may also be used to communicate a family's needs to public housing authorities, social service agencies and other relief organizations.

The lead investigation report along with notification letters and notes on follow-up activities may also be needed to provide a historical account of information to be used to establish facts in future civil litigation. For all these reasons it is important that the environmental lead investigation report be written clearly and concisely to allow a person who was not present during the investigation to learn what the investigation team knows about the case.

### Suggested Format

The format used for reports of environmental investigations will vary according to individual style and the nature of the sites being investigated. A basic format has been developed to provide some uniformity in reporting of lead poisoning hazards (See example in appendix). Reports will generally include the following elements:

- Cover information (Names, addresses and dates)
- Background (Information about child, family and environment)
- Findings (Results of analyses and identification of hazards)
- Recommendations (Short-term methods to reduce exposure)
- Remediation required (Hazards and possible solutions)

**Cover information** should include the date the report was written, the date of the investigation, street addresses for all properties investigated, the dates of construction or age of each property investigated, and the names and mailing addresses of the property owner(s). It should include the name of the school or child care facility where the investigation was conducted and the name of the person who requested the investigation. The names, titles and employers of each member of the investigation team present during the investigation should also be listed on the cover information.

**Background information** should include who identified the elevated blood lead level, whether or not the blood lead level exceeds the action level for environmental follow-up and when the request was made for environmental follow-up.

Do not include the name of the child with an elevated blood lead level or confirmed lead poisoning, but rather, describe the victim's family structure including names of parents or guardians and other people living at the same address. Make note of any other young children who may be exposed to the same environment as the victim and indicate whether or not their blood lead levels

have been tested, but do not indicate any blood lead test results.

Give a brief description of the age and condition of the home and any supplemental addresses regularly visited by the child and note whether or not deteriorating paint is present. Any other potential risk factors identified during interviews of parents should be mentioned. Background information should include a statement that the purpose of the investigation is to identify sources of lead exposure to children.

**Findings** will describe what was done by the investigation team and what was learned from those activities. A separate heading should be used for each address investigated. Activities to be summarized in this portion of the report include: Visual inspections, x-ray fluorescence, and analyses of paint, soil, dust, or water samples.

A separate paragraph should be written for each type of sampling or analysis performed including: why the analysis was necessary, what was tested, where samples were analyzed, what type of analysis was used, the results of analysis, how results relate to action levels, and the type and location of lead poisoning hazard identified.

**Recommendations** include interim measures that parents can use to reduce a child's lead exposure. This section should mention the potential health effects of lead and state the importance of eliminating the source of lead exposure. Lead-safe housing should always be recommended for children with elevated blood lead levels. If hazards are so extensive that the child cannot safely return to the home, alternative housing should be recommended until after the remediation of hazards is completed.

**Required remediation** should identify all hazards that must be addressed and give the locations of those hazards. This section should cite the general statute and administrative rule that require hazards to be remediated. General information should be given concerning acceptable methods.

**Additional information** should be included about the need for certified contractors if abatement is pursued and the need to comply with the federal lead-based paint disclosure law. **Supplemental Information** should be sent with every report.

## **Notifications**

Once lead poisoning hazards have been identified in a residential housing unit or child-occupied facility, the local authorized agent must make written notification to the property owner or managing agent and to all persons residing in or attending the unit or facility. In addition to the required notifications, it is likely that other people such as doctors, housing authorities, and social workers will need to be informed of lead poisoning hazards affecting small children. In most cases the notification will include a cover letter and a copy of the environmental lead investigation report.

### **Owner Notification**

Upon determination that a lead poisoning hazard exists in a residential housing unit or child-occupied facility occupied or regularly visited by a child less than six years of age, a written notice must be given to the owner or managing agent of the building. Owner notifications should generally be delivered by certified mail to the owner of record who can be identified through land records at the local tax office. If the owner has hired an agent to manage the property, notification can be made through the agent. Owner notifications for schools and child care facilities should be sent to the superintendent of the local school unit or the licensed child care operator.

The notification letter must include the street address of the property inspected and a statement that lead poisoning hazards have been identified on the property. It must give a description of all

hazards found or make reference to an enclosed environmental lead investigation report that includes a description of the hazards identified. Notifications involving schools or child care facilities should include a request for a list of names and addresses for parents of children under six years old.

Owners must be notified whether or not lead poisoning hazards on their property have been determined to be a potential source of an elevated blood lead level in a child less than six years of age. If the property has been linked to a lead-poisoned child, the notification must indicate that lead poisoning hazards must be remediated and cite the general statutes and administrative rules. The owner must be requested to submit a written lead poisoning hazard remediation plan within 14 days of receiving the owner notification. If the property has not been determined to be a potential source of confirmed lead poisoning in a young child, this must be stated and remediation of lead poisoning hazards should be recommended but cannot be required.

Recommended methods of remediation must be included with the owner notification. These methods can be recommended in the notification letter or in an enclosed environmental lead investigation report. Additional information on remediation methods is included in Appendix 9 of this manual. All owner notifications should include a copy of G.S. 130A-131.5 - 130A-131.9H and administrative rules 15A .3100 18A.

### **Occupant Notification**

In addition to the owner, notification, written notice of lead poisoning hazards must be given to all responsible persons residing in or attending a residential housing unit or child-occupied facility where lead poisoning hazards have been identified. A lead poisoning hazard notification must be sent to each residential housing unit where lead poisoning hazards were identified and to the parents of all children under six years old who may have been exposed in a school or child care facility.

The occupant notification must include the street address of the residential housing unit or the name of the school or child care facility where a lead poisoning hazard was identified. A brief description of the type and location of the hazard or reference to an enclosed lead investigation report containing a description of the hazard must be included. If interim measures are necessary to protect young children until remediation is completed, a list of interim measures must be included in the occupant notification. Appendix 6 includes a list of emergency intervention measures to suggest.

In cases where a lead poisoning hazard has been identified in a school or child care facility, parents of all children less than six years old attending the school or facility must be provided some general information about the threat lead may pose to young children and shall be notified that testing of the child's blood lead level is recommended (or required if a child with an elevated blood lead level has been identified). The notification must contain instructions on how and where to obtain blood lead testing.

### **Other Notifications**

At times it may be desirable to make notification of lead poisoning hazards to persons or organizations able to assist the child or affect the outcome of the remediation process. A copy of the environmental lead investigation report should be sent to the child's attending physician to assist him/her with determining whether or not the child should be removed from the home for treatment. Social workers may be able to assist families with emergency relocation if they are informed that a child is living in an environment injurious to her/his health. Housing authorities may be able to relocate or prioritize poor families with lead poisoned children for public housing. Housing Authorities can also be helpful in enforcing remediation of federally assisted low income housing by eliminating rent subsidies to landlords for houses that are not lead-safe. Mental health agencies may

be able to help developmentally delayed children. Community development organizations can help fund lead remediation in areas targeted for rehabilitation. Resources to assist families with protecting their children from lead exposure differ from one community to another, but is often worthwhile to identify sources of assistance and inform them of lead related problems.

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## APPENDIX 10

- Components of Environmental Lead Investigation Report
- Sample Investigation Report, Supplemental Information, Notifications, Orders, Forms, and Letters