

ENFORCEMENT



CITY OF MILWAUKEE
HEALTH DEPARTMENT

ENFORCEMENT CHANGES

Moving from...

- Order to citations (Everything by Primary Prevention funding)

Moving to...

- Order fees to appeal hearings to compliance failure to court (last resort)
- HUD/ARPA funding for low-income property owners/landlords
- Others contributory split on funding (carrot and stick)
- SOPs and Quality Control for due process

TOOLS OF ENFORCEMENT

EXPANDED IN 2022 ORDINANCE

- Orders
 - Orders are legal documents which order the owner to make repairs and set a time limit for completing them.
- Citations
 - Expands ability to issue citation, refer to DNS for issuance of rent withholding notification
- Reinspection Fees
 - Increases the fees that we can charge for reinspection & allows the cost of abatement, interim controls and relocation to be assessed and collected as a special charge on the property
- Special Assessments

ENFORCEMENT OBJECTIVES

- To hold landlords who are doing the most harm & are the least compliant accountable.
- Education through community outreach to homeowners who are in the target zones (awareness)
- Preemptive approach to lead before it reaches the action level threshold (Use of ARPA, door hangers)
- Increase participation in our lead registry

ENFORCEMENT PARTNERSHIP

- Create a partnership with other enforcement agencies to tackle difficult property owners and large LLC's. We will be working with DHS, DNR, DNS and DOJ on these special cases.
- Engagement of other outside agencies and entrepreneurs when other funding sources subside.
- Work with partners to deal with temporary housing for incidental displacement of people affected during the enforcement process.

LANDLORD EDUCATION

Collaboration with DNS to include MHD messaging in landlord training presentations

- Funding opportunities for abatement (Primary Prevention, Healthy Homes)
- Pre-Inspection Appointment Letters
- Joining the Lead Safe Registry

LANDLORD OUTREACH

Several opportunities for landlords / MHD to achieve compliance, including:

- Appointment letter
- Pre-reinspection fee letter
- Fee letter
- Appeal hearings
- Rebranding Lead safe kit to Healthy Home Kit
- Free Hepa Vac loaner program

Landlord Education

CITY OF MILWAUKEE HEALTH DEPARTMENT | Childhood Lead Primary Prevention Program

**FUNDING UP TO
\$40,000 PER UNIT**
(HUD Grant)

Area of Availability:
Properties within the
City of Milwaukee

The Childhood Lead Poisoning and Prevention Program funds up to **\$40,000 per unit** via the Department of Housing and Urban Development (HUD) grant and Community Development Block Grant (CDBG). These programs allow property owners to fix lead hazards.

Sources of Lead

The main sources of lead are paint, dust, soil, & water. As a property owner, you're required to notify your tenant of possible lead hazards, as well as provide them with a "Protect Your Family from Lead in Your Home" booklet prior to their tenancy.

Homes having lead dust are recommended to use a High Efficiency Particulate Air (HEPA) vacuum to clean carpeted floors. Contact Milwaukee Health Department Lead program to find out about FREE HEPA vacuum rentals!

(414)-286-2165

Milwaukee City Ordinance: Toxic and Hazardous Substances Chapter - Subchapter 2



Lead is harmful to the developing brains and nervous systems of children 6 years and younger. Lead poisoning leads to slowed growth and development, and causes problems with a child's hearing, speech, learning and behavior.

Homes built before 1978 most likely contain lead-based paint, and if deteriorated can pose a human health hazard.

For more lead safety information, please visit
milwaukee.gov/Lead

LOCAL LEAD ABATEMENT CONTRACTORS

MHD verified local abatement contractors that are certified. The list is not a recommendation, but helpful guidance to property owners. MHD recommends that owners contact several contractors for estimates for lead abatement.

COMPANY NAME	ADDRESS	CONTACT INFORMATION
East Side Contractors, Inc. Reza Namin	3429N. Summit Ave. Milwaukee, WI 53211-2982	414-702-7862 naminreza20@yahoo.com
Solo Home Improvements Ernesto Velasco	732 W. Pierce St. Milwaukee, WI 53204	414-324-254 ev911643@gmail.com
Weatherization Services Devlin Hawthorn	1101 W. Layton Ave. Milwaukee, WI 53221	414-467-9399 mweatherization@aol.com
Hope Home Improvement Undraya Howards	W5755S06 Wood Lily Ln. Wauwatosa, WI 53209	414-617-8144 hopehomeservices3@gmail.com
GW Harris Investments LLC George Harris Jr.	5332 N. 63rd St. Milwaukee, WI 53218	414-754-5767 lonnicco@yahoo.com
West Care Travis Landry	335 W. Wright St. Milwaukee, WI 53212	414-323-0185 travis.landry@westcare.com
Royalty Home Improvement Kearney Grayson Sr.	2709 N. 48th St. Milwaukee, WI 53211	414-484-8338 kgrayson2@gmail.com
MJ Contractor LLC Joseph Tubane	439 W. Boston St. Milwaukee, WI 53207	414-759-2332 mjcontractors1@gmail.com
New Gen Development Elyse Jackson	333 W. Brown Deer Rd. Unit G 936 Milwaukee, WI 53217	414-317-0956 inquiry@newgendevelopmentmke.com
Blue Brick Construction Al Jackson	2658 N. Sherman BL (Lower) Milwaukee, WI 53210	414-312-1615 bluebrickconstructionmke@gmail.com
Wesley Construction LLC John M. Wesley	3731 N. 41st St. Milwaukee, WI 53210	414-722-1615 jwconstructionllc@gmail.com
Renovation Incorporated Al Jackson	1303 N. 12th St. Unit 1703 Milwaukee, WI 53205	414-312-1615 hackrone@icloud.com
B&E Statewide Services Elisha Fowler	203 W. Coventry Ct. Apt 215 Glendale, WI 53217	414-292-7993 bfowler80@gmail.com
White Glove Group Inc. London Thomas	8316 N. Steven Rd. Milwaukee, WI 53223	414-760-1733 london@uggllc.com
Green Energy Insulation Alba Contreras	1136 S. Layton BL #A Milwaukee, WI 53215	414-394-4518 puraamc@hotmail.com
Hamilton Contractors, LLC Enrique Godinez	3729 N. 6th St. Milwaukee, WI 53212-1952	414-202-0425 hamiltoncontractors2@yahoo.com
Renteria Renovations, LLC	PO Box 44225 West Allis, WI 53214	414-238-1917 renteriarenovations@gmail.com
Hias Construction, LLC	1025 W. Scott St. Milwaukee, WI 53204	414-793-8946 hiasconstruction@yahoo.com
RC Contracting, LLC	3711 W. National Ave. Milwaukee, WI 53215	414-530-8766 rconcontractingllc@yahoo.com
TL Reese Troy Reese	2130 W. Clybourn St. Milwaukee, WI 53233	414-264-3000 troy.reese@tlreese.com
One Day Real Estate Services Sovande Nadeem	8544 W. National Ave. West Allis, WI 53227	414-588-7869 sowandem@gmail.com
Green Homeowners United	9618 W. Greenfield Ave. West Allis, WI 53214	414-604-6450 saldrick@greenhomeownersunite.com

Pre-inspection Fee Letter



City of Milwaukee Health Department
Inspection Services for health, safety and neighborhood improvement
September 28, 2023
Record #:

Commissioner of Health

Deputy Commissioner of Environmental Health

Director of Home Environmental Health

Re:

When a property is reinspected and violations remain uncorrected, the Milwaukee Code of Ordinances provides for these

Reinspection fees:

First reinspection
Second reinspection
All subsequent reinspections

There is no charge for the reinspection that shows compliance with all violations.

All reinspections which show noncompliance with the order will be charged at the above rate. These fees will be assessed against the property as a special charge and will appear on the tax bill for this property. On, we imposed a \$ reinspection fee, which includes a training and technology surcharge. There has been a total of \$ in reinspection fees assessed on this order for.

As you can see, the cost of noncompliance with the code can add up quickly. The Department would prefer to see you put the money into correcting the violations and not into paying reinspection fees. Please contact me as soon as the violations have been corrected. If it does not meet from you, we will continue to reinspect until the property has been brought into compliance with the code. Please do not put us in that situation.

If you wish to appeal this charge you must file that appeal within 30 days of the date of this letter. It must be filed with the Milwaukee Health Department, Environmental Health, 841 N. Broadway, Milwaukee Wisconsin 53202. The written appeal shall state with specificity the reason that the appellant believes the order was issued in error.

If you have filed for bankruptcy, this letter is for informational purposes and is not intended to be construed as an attempt to collect a debt during the pendency of your bankruptcy. However, you may incur additional charges during the bankruptcy as long as the violations remain uncorrected.

To discuss the violations, please contact the inspector listed below. Please contact your attorney with any legal questions as this office cannot give legal advice.

Please call Inspector at for information on which violations remain uncorrected or if you have any questions.

Violations can also be viewed on our website at www.milwaukee.gov/mis

841 N. Broadway • Milwaukee, WI 53202 • 414 286-2165 • <http://city.milwaukee.gov/mis>

Appointment Letter



Commissioner of Health

Deputy Commissioner of Environmental Health

City of Milwaukee Health Department
Inspection Services for health, safety and neighborhood improvement

Director of Home Environmental Health

October 11, 2023

Re: NOTICE OF LEAD INVESTIGATION

Dear Owner/Occupant:

On, the Milwaukee Health Department ("MHD") received a report that a child residing at ("The Property") tested with an elevated blood lead level ("EBLL"). Pursuant to Wisconsin Statute § 254.166, MHD is required to conduct a lead investigation when notified that an occupant under 6 years of age has an EBLL.

MHD will conduct the required lead investigation at the Property on. If you need to request an alternative inspection date/time, please call.

Under Wis. Stat. § 254.166, if the owner or occupant refuses to allow MHD to enter the property to conduct the lead investigation, MHD will seek a special inspection warrant. Failure to request an alternative inspection date/time or to grant access to the Property on will be deemed to be a refusal of consent to enter the property.

EBLL lead investigations are designed to protect not only current occupants but also to prevent future occupants from exposure to lead hazards. Your participation in creating a lead-safe property is appreciated.

Respectfully,

TENANT EDUCATION



Tenants' Rights and Responsibilities

Landlord / Tenant Guide:

This guide is regulated by Wis. Stat. ch. 704, and Wis. Adm. Code ch. ATCP 134 which applies to the business practices related to the rental of most residential dwelling units within this state. This guide serves as a resource for both landlords and tenants in regard to each party's obligations and responsibilities prior to, during, and ending a lease.



Tenants' Rights & Responsibilities BCP fact sheet:



Wis. Adm. Code ch. ATCP 125, Manufactured Home Communities:



Wis. Stat. ch. 704 Landlord and Tenant:



Wis. Adm. Code ch. ATCP 134, Residential Practices:



Avoid evictions and know your rights!

Legal Action of Wisconsin:

Legal action of Wisconsin has a number of resources to help tenants facing a potential eviction notice. These forms provided will better help tenants understand their rights and assist them with unruly landlords.



Wis. Stat. ch. 799, Sections 799.40 to 799.45, Evictions:



Find out if a property has code violations or existing lead orders:

Click on "Look Up Property Information" and follow the prompts to fill in the address information. If there are any existing codes or violations on the property, they will show up here.



Lead Safe Registry



CITY OF MILWAUKEE LEAD SAFE REGISTRY ELECTION FORM

Milwaukee Health Department has created a Lead Safe Registry. The goal of the registry is to promote and document lead safety through Lead Hazard Reduction in homes throughout the City of Milwaukee. By volunteering to add your property to this registry, you will receive a lead safe certificate and have your property listed on the Lead Safe Registry for a period of three (3) years.

Please list the property address below:

Address: _____

Please choose an option to opt in or out of being a part of this registry:

- ☐ Yes, I want to be part of the Lead Safe Registry
☐ No, I don't want to be part of the Lead Registry
☐ Owner unable to respond at this time

Signature _____

Date _____

FRANK P. ZEIDLER MUNICIPAL BUILDING
190 North Broadway / 1st Floor / Milwaukee, WI 53202

(414) 296-3523
City.Milwaukee.gov/Health

LIVING YOUR BEST LIFE.

DISCLAIMER:

By applying for the Primary Prevention Program and meeting the eligibility requirements for funding, the property owner grants permission to the City for a lead hazard inspection and abatement, if necessary. All inspections and re-inspections will be done in accordance with Wis. DHS 163.42(2). Eligibility for funding for these activities is subject to specific requirements. Reasonable expenses are to be paid directly to the approved, qualified contractor by the City, up to \$40,000 per unit. Any repairs, unrelated to lead abatement, will not be covered by the grant money or the City.

If any work or damage is done that disturbs any painted surface on the interior or exterior of a building or some disturbance of bare ground around a building in the Lead Safe Registry, a re-inspection must be done in order to maintain a valid Lead Safe certificate. Activities that disturb surfaces include, but are not limited to:

1. Sanding, scraping or blasting of walls, ceilings, floors
2. Wall repairs and water damage repairs greater than 2 sq. feet
3. Stripping painted woodwork with heat guns or chemicals
4. Window repair or replacement
5. Welding of painted surfaces
6. Power washing of the exterior surface of the building
7. Carpet replacement
8. Disturbance of bare ground outside the building

The Lead Safe Registry is a voluntary listing and as such, is dependent upon participants to keep information up to date and to request re-inspections after surfaces are disturbed. The City takes no responsibility for the accuracy of this registry beyond the date of the inspection.

Lead Safe Registry Application

CITY OF MILWAUKEE HEALTH DEPARTMENT **H0042 - LEAD REGISTRY FORM**

Company Name: _____
Mailing Address: _____
City: _____ State: _____ Zip: _____
Resident Address: _____
City: _____ State: _____ Zip: _____
Telephone Number: _____ Fax Telephone Number: _____
Cellular Telephone Number: _____ Pager Telephone Number: _____
Email Address: _____

FACILITY INFORMATION (Only one facility per application)
Facility Type (Check one of the following):
☐ Commercial Business ☐ Day Care / Preschool ☐ K-12 School ☐ Government ☐ HUD Residential
☐ Lead-Safe Facility ☐ Lead-Safe Residential ☐ Manufacturing ☐ Public ☐ Residential
☐ University ☐ Unknown

Occupancy Type (Check one of the following):
☐ Owner Occupied ☐ Tenant / Rental ☐ Unknown

Facility Name, if applicable: _____
Street Address: _____
City: _____ State: _____ Zip: _____

Property to be Registered:
☐ Entire building ☐ Single dwelling unit
Type # of units: _____

Unit Description: _____
Common Area Description: _____

Property Owner/Authorized Representative: _____
Contact Person: _____ Telephone Number or other contact info (e.g. email address): _____

AFFIDAVIT OF APPLICANT
I affirm that, to my knowledge, the information on this form completely and accurately reflects the investigation conducted by myself or other staff under my control. I understand that false or forged statements made in connection with this application may be grounds for revoking the lead-safe / lead-free property certification.

SIGNATURE - Certified Lead Hazard Investigation, Inspector, or Risk Assessor Date (Signed (month/day)) _____

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ATTACHMENTS
For all applications, certified lead hazard investigation, inspector, or risk assessor must check the following materials are attached and submitted:

☐ APPLICATION FOR REGISTRATION OF LEAD-SAFE PROPERTY INVESTIGATION PROTOCOL
☐ PROTOCOL (Pages 3 and 4)
☐ APPLICABLE INVESTIGATION INFORMATION (Provide investigation information sheets for the types of investigations conducted)
☐ LEAD-SAFE INVESTIGATION INFORMATION (Pages 5 - 8)

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INVESTIGATION PROTOCOL

General Information
Report status at time of investigation: The term "Investigation" is used when the activity may be part of either a lead-free inspection or a lead-safe investigation. Unless proven to be lead-free by a qualified individual, all paint is considered to be lead-based paint.
Check boxes that apply and fill in appropriate information.

A. PROPERTY INFORMATION

In the investigator's opinion, was the property maintained at or above average? ☐ Yes ☐ No
(For research & analysis only; does not affect certificate.)
Is this a single-family dwelling? If yes, skip to Section B. ☐ Yes ☐ No
Was random sampling used? If no, skip to Section B. ☐ Yes ☐ No
Are there more than 20 dwelling units of similar construction and age built before 1960, or more than 10 dwelling units of similar construction and age built in 1960 or later? ☐ Yes ☐ No
Were locations for sampling selected using random sampling? ☐ Yes ☐ No
Were locations for sampling selected using documented methodologies? ☐ Yes ☐ No
Enter number of units sampled: _____
Were all structures (units and common areas) constructed after 1990? ☐ Yes ☐ No

B. CONFLICT OF INTEREST

Was any investigator a property owner, or an immediate family member, agent, or employee of a property owner? ☐ Yes ☐ No
Was any investigator a lead company or associated with a certified lead company that is directly or beneficially owned, controlled or managed by the property owner, or by an immediate family member, agent or employee of the property owner? ☐ Yes ☐ No
Was any investigator a person hired by or under contract with the property owner to manage or maintain the property owner's real property as directed by the property owner? ☐ Yes ☐ No
Was any investigator a person who has been authorized by the property owner to manage or maintain the property owner's real property on the property owner's behalf? ☐ Yes ☐ No
Was any investigator a person who has a financial interest in the laboratory results of the sampling or testing or in the determination of whether the property meets the registered lead-free property standard or the registered lead-safe property standard? ☐ Yes ☐ No
Was the lead investigation performed in an unbiased, objective and impartial manner in accordance with s. DHS 163.40 and work practice standards under s. DHS 163.54, 163.41, or 163.42, as applicable? ☐ Yes ☐ No

C. INVESTIGATION INFORMATION

Enter the start date of the investigation: _____
Were samples submitted to a laboratory for analysis? ☐ Yes ☐ No
Enter the date the laboratory report was received: _____
Enter the name of the laboratory where samples were analyzed: _____
Enter the end date of the investigation: _____
Enter the certification number of each person involved in performing this lead investigation: _____

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Lead Safe Registry Application

D. XRF	
Was an XRF used in this investigation? If No, skip to Section E.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Enter XRF Manufacturer	
Enter XRF Model	
Enter XRF Serial Number	
Enter date source was last repaired	
Was the XRF calibrated per manufacturer's specifications?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was the XRF used according to the manufacturer's specifications?	<input type="checkbox"/> Yes <input type="checkbox"/> No
How many surfaces were tested using the XRF?	
Were any XRF readings inconclusive according to the manufacturer's specifications? If No, skip to Section E.	<input type="checkbox"/> Yes <input type="checkbox"/> No
How many surfaces had readings that were inconclusive?	
Were all surfaces with inconclusive XRF readings assumed to be lead-based paint? If Yes, skip to Section E.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were paint chip samples taken of surfaces with inconclusive readings?	<input type="checkbox"/> Yes <input type="checkbox"/> No
E. PAINT CHIP SAMPLES	
Were paint chip samples collected in this investigation? If No, skip to Section F.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were documented methodologies used to collect the paint chip samples?	<input type="checkbox"/> Yes <input type="checkbox"/> No
How many paint chip samples were collected?	
F. DUST WIPES SAMPLES	
Were dust wipe samples collected in this investigation? If No, skip to Section G.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were single-surface dust wipe samples collected?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were documented methodologies used to collect the single-surface dust wipe samples?	<input type="checkbox"/> Yes <input type="checkbox"/> No
How many single-surface dust wipe samples were collected?	
Were composite dust wipe samples collected? If No, skip to Section G.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were documented methodologies used to collect the composite dust wipe samples?	<input type="checkbox"/> Yes <input type="checkbox"/> No
How many composite dust wipe samples were collected?	
G. SOIL SAMPLES	
Did the property owner request an evaluation of soil? If No, proceed to either the Lead-Free Inspection Information or Lead-Safe Investigation Information Form.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was bare soil present? If No, proceed to either the Lead-Free Inspection Information or Lead-Safe Investigation Information Form.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were soil samples collected?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were documented methodologies used to collect the soil samples?	<input type="checkbox"/> Yes <input type="checkbox"/> No
How many soil samples were collected?	
Was the arithmetic mean (average) of the laboratory results for the soils equal to or greater than 2,000 parts per million?	<input type="checkbox"/> Yes <input type="checkbox"/> No

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LEAD-SAFE INVESTIGATION INFORMATION	
Report status at the time of the lead-safe investigation. A previous determination that paint is lead-free may be included in this lead-safe investigation if the current investigator determines the process used to make the determination complies with the sampling and testing protocol under s. DHS 153.40, Wis. Admin. Code.	
Check boxes that apply and fill in appropriate information.	
M. VISUAL ASSESSMENT - SCOPE	
Was a visual assessment conducted of all dwelling units selected for investigation using documented methodologies?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was a visual assessment conducted of all exterior and interior common areas?	<input type="checkbox"/> Yes <input type="checkbox"/> No
N. VISUAL ASSESSMENT - GENERAL EXTERIOR	
Were lead-based paint chips visible on soil?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was lead-based paint (paint that had not been proven to be lead-free) present on any exterior building component? If No, skip to Section S.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were gutters and downspouts present?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were gutters and downspouts functioning normally?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was there evidence of damage to a lead-based painted surface due to a lack of gutters or downspouts?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were all lead-based painted exterior building components fully enclosed with durable material?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did any enclosure show evidence of falling? If No, skip to Section S.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was there exterior evidence of ongoing water damage to lead-based painted surfaces, such as damage from an unrepaired water leak in the roof, gutter, downspout, foundation, plumbing, air conditioning or heating system?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was there evidence of mold, mildew, moisture or water damage to an exterior component where lead-based paint is present but no active leak?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did any substrate show visible evidence of defect, damage, decay or deterioration that might cause deteriorated paint?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was deteriorated lead-based paint detected on exterior building components below 5 feet from ground or floor level?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was deteriorated lead-based paint detected on exterior painted building components at a height above 5 feet from ground or floor level? If No, skip to Section O.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was the combined total area of all deteriorated lead-based paint for all exterior surfaces above 5 feet from ground or floor level more than 5 square feet?	<input type="checkbox"/> Yes <input type="checkbox"/> No
O. VISUAL ASSESSMENT - EXTERIOR FLOORS AND STAIRS IN SECURED AREAS	
In an area that is locked and secured against access by occupants (other than the property owner, property owner's family, agent or employee), was lead-based paint (paint that had not been proven to be lead-free) present on any exterior floor or stairs? If No, skip to Section P.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was all lead-based paint on these exterior floors and stairs entirely enclosed with durable material?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did any enclosure of these exterior floors or exterior stairs show evidence of falling? If No, skip to Section P.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were all painted surfaces of these exterior floors and the traffic areas of these stair treads covered by carpeting or a durable material that protects them from abrasion?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were all lead-based painted surfaces of these exterior floors and the traffic area of all stair treads protected by a topcoat that does not contain lead-based paint? If No, skip to Section P.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the lead-free topcoat on any lead-based painted surface of these exterior floors show evidence of abrasion, such as an obvious wear pattern or extensive scuffing?	<input type="checkbox"/> Yes <input type="checkbox"/> No

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P. VISUAL ASSESSMENT - EXTERIOR FLOORS OF DWELLING UNITS AND COMMON AREAS	
Was lead-based paint (paint that had not been proven to be lead-free) present on any exterior floor (excluding stairs) of a dwelling unit or common area? If No, skip to Section Q.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was all lead-based paint on these exterior floors entirely enclosed with durable material?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did any enclosure of these exterior floors show evidence of falling? If No, skip to Section Q.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were all painted surfaces of these exterior floors covered by carpeting or a durable material that protects the floors from abrasion? If yes, skip to Section Q.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were all lead-based painted surfaces of these exterior floors protected by a topcoat that does not contain lead-based paint? If No, skip to Section Q.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the lead-free topcoat on any lead-based painted surface of these exterior floors show evidence of abrasion, such as an obvious wear pattern or extensive scuffing?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Q. VISUAL ASSESSMENT - EXTERIOR STAIRS OF DWELLING UNITS AND COMMON AREAS	
Was lead-based paint (paint that had not been proven to be lead-free) present on any exterior stair of a dwelling unit or common area? If No, skip to Section R.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was all lead-based paint on these exterior stairs entirely enclosed with durable material?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did any enclosure of these exterior stairs show evidence of falling? If No, skip to Section R.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was all lead-based paint on the traffic area of the stair treads covered with a durable material or carpet that protects the treads from abrasion? If yes, skip to Section R.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were all lead-based painted surfaces of these exterior stair treads protected by a topcoat that does not contain lead-based paint?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the lead-free topcoat on any lead-based painted traffic area of these exterior stair treads show evidence of abrasion, such as an obvious wear pattern or extensive scuffing?	<input type="checkbox"/> Yes <input type="checkbox"/> No
R. VISUAL ASSESSMENT - EXTERIOR PORCHES AND MISCELLANEOUS EXTERIOR HORIZONTAL SURFACES OF DWELLING UNITS AND COMMON AREAS	
Other than an exterior floor or stair, was lead-based paint (paint that had not been proven to be lead-free) present on any exterior porch component or any horizontal exterior surface? If No, skip to Section S.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was all lead-based paint on these exterior porch components and horizontal surfaces entirely enclosed with durable material? If No, skip to Section S.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did any enclosure of these exterior porch components or horizontal surfaces show evidence of falling?	<input type="checkbox"/> Yes <input type="checkbox"/> No
S. VISUAL ASSESSMENT - GENERAL INTERIOR	
Were lead-based paint chips visible on floors, stairways, windowsills, or window wells (troughs)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was lead-based paint (paint that had not been proven to be lead-free) present on any interior component, including built-in cabinets? If No, skip to Section T.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were all painted interior components fully enclosed with durable material?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did any enclosure show evidence of falling? If No, skip to Section T.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was deteriorated lead-based paint detected on any interior component?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did any substrate show visible evidence of defect, damage, decay or deterioration that might cause deteriorated paint?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was unkeyed plaster present beneath lead-based paint?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was there interior evidence of ongoing water damage to painted surfaces, such as damage from an active water leak that was not repaired?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was there evidence of mold, mildew, moisture or water damage to an interior component where lead-based paint is present but no active leak?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Other than windows, doors, drawers, stairs or floors, was unprotected lead-based paint present on any interior friction surface?	<input type="checkbox"/> Yes <input type="checkbox"/> No

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Lead Safe Registry Application

T	VISUAL ASSESSMENT – INTERIOR FLOORS AND STAIRS IN LOCKED AND SECURED AREAS			
<p>In an area that is locked and secured against occupants (other than the property owner, property owner's family, agent or employee), was lead-based paint (paint that had not been proven to be lead-free) present on any interior floor or stairs? <i>If No, skip to Section U.</i></p>				
Was all lead-based paint on these interior floors and stairs entirely enclosed with durable material?		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Did any enclosure of these interior floors or stairs show evidence of falling? <i>If No, skip to Section U.</i>		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Were all painted surfaces of these interior floors and the traffic areas of these stair treads covered by carpeting or a durable material that protects them from abrasion? <i>If Yes, skip to Section U.</i>		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Were all lead-based painted surfaces of these interior floors and the traffic area of all stair treads protected by a topcoat that does not contain lead-based paint? <i>If No, skip to Section U.</i>		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Did the lead-free topcoat on any lead-based painted surface of these interior floors show evidence of abrasion, such as an obvious wear pattern or extensive scuffing?		<input type="checkbox"/>	Yes	<input type="checkbox"/>
U	VISUAL ASSESSMENT – INTERIOR FLOORS OF DWELLING UNITS AND COMMON AREAS			
<p>Was lead-based paint (paint that had not been proven to be lead-free) present on any interior floor (excluding stairs) of a dwelling unit or common area? <i>If No, skip to Section V.</i></p>				
Was all lead-based paint on these interior floors entirely enclosed with durable material?		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Did any enclosure of these interior floors show evidence of falling? <i>If No, skip to Section V.</i>		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Were all painted surfaces of these interior floors covered by carpeting that protects the floors from abrasion? <i>If yes, skip to Section V.</i>		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Were all lead-based painted surfaces of these interior floors protected by a topcoat that does not contain lead-based paint? <i>If No, skip to Section V.</i>		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Did the lead-free topcoat on any lead-based painted surface of these interior floors show evidence of abrasion, such as an obvious wear pattern or extensive scuffing?		<input type="checkbox"/>	Yes	<input type="checkbox"/>
V	VISUAL ASSESSMENT – INTERIOR STAIRS OF DWELLING UNITS AND COMMON AREAS			
<p>Was lead-based paint (paint that had not been proven to be lead-free) present on any interior stair of a dwelling unit or common area? <i>If No, skip to Section W.</i></p>				
Was all lead-based paint on these interior stairs entirely enclosed with durable material?		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Did any enclosure of these interior stairs show evidence of falling? <i>If No, skip to Section W.</i>		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Were the traffic areas of all interior lead-based painted stair treads in a dwelling unit or common area covered with a durable material or carpet that protects the treads from abrasion? <i>If yes, skip to Section W.</i>		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Did lead-based painted traffic areas of interior stair treads in dwelling units and common areas have, at a minimum, a protective topcoat that does not contain lead-based paint?		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Did lead-based painted traffic areas of interior stair treads in dwelling units and common areas show evidence of abrasion, such as an obvious wear pattern or extensive scuffing?		<input type="checkbox"/>	Yes	<input type="checkbox"/>
W	VISUAL ASSESSMENT – DOORS OF INTERIOR BUILT-IN CABINETS OF DWELLING UNITS AND COMMON AREAS			
<p>Was lead-based paint (paint that had not been proven to be lead-free) present on any door of an interior built-in cabinet of a dwelling unit or common area? <i>If No, skip to Section X.</i></p>				
Was all lead-based paint on these cabinet doors entirely enclosed with durable material?		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Did any enclosure of these cabinet doors show evidence of falling? <i>If No, skip to Section X.</i>		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Was there evidence that the opening or shutting of any of these cabinet doors exposed paint to damage by the impact of the door striking another component?		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Was built-up paint present where it could be crumbled by normal action of a cabinet door, such as on the hinge side of a door?		<input type="checkbox"/>	Yes	<input type="checkbox"/>
Was there evidence of friction inducing a lead-based paint surface of these cabinet doors, such as stroking or biting?		<input type="checkbox"/>	Yes	<input type="checkbox"/>

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HO242 – Lead Registry Form
MHC graphics 6/28/23

X	VISUAL ASSESSMENT – DRAWERS OF INTERIOR BUILT-IN CABINETS OF DWELLING UNITS AND COMMON AREAS		
	Was lead-based paint (paint that had not been proven to be lead-free) present on any drawer of an interior built-in cabinet of a dwelling unit or common area? <i>If No, skip to Section Y.</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Was all lead-based paint on these cabinet drawers entirely enclosed with durable material?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Did any enclosure of these cabinet drawers show evidence of failing? <i>If No, skip to Section Y.</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Was there evidence that the opening or shutting of any of these cabinet drawers exposed paint to damage by the impact of the drawer striking another component, such as the face of the cabinet?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Was built-up paint present where it could be crushed by normal action of a cabinet drawer?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Was there evidence of friction involving a lead-based paint surface of a built-in cabinet drawer, such as sticking or binding?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Y	VISUAL ASSESSMENT – INTERIOR AND EXTERIOR DOORS OF DWELLING UNITS AND COMMON AREAS		
	Was lead-based paint (paint that had not been proven to be lead-free) present on any interior or exterior door? <i>If No, skip to Section Z.</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Was all lead-based paint on all interior and exterior doors entirely enclosed with durable material?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Did any enclosure of these doors show evidence of failing? <i>If No, skip to Section Z.</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Was there evidence that the opening or closing of any interior or exterior door exposed paint to damage by the impact of the door striking another component?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Was built-up paint present where it could be crushed by normal action of any door, such as on the hinge side of a door?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Was there evidence of friction involving a lead-based paint surface of a door, such as sticking or binding?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Z	VISUAL ASSESSMENT – INTERIOR AND EXTERIOR WINDOW SYSTEM COMPONENTS OF DWELLING UNITS AND COMMON AREAS		
	Was lead-based paint (paint that had not been proven to be lead-free) present on any interior or exterior component of a window system (including storm and screen windows)? <i>If No, skip to Section 2A.</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Were weep holes present, open, and functional in all of these window systems that are designed to have weep holes?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Was all lead-based paint on these window system components entirely enclosed with durable material?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Did any enclosure of these window system components show evidence of failing? <i>If No, skip to Section 2A.</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Were window weathertight seals smooth and cleanable?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Did windows function normally?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Was built-up paint present on window systems where it might be crushed to create dust/lead or debris?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Was glazing missing or did it have gaps?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Were operable storm windows present and installed seasonally (unless windows are double-paned or not designed for storm windows).	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Was exposed lead-based paint present on any impact or friction surface of a window?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2A	DUST SAMPLING OF COMMON AREAS		
	Were composite dust wipe samples collected in common areas?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Were single-surface dust wipe samples collected from common areas?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	Was at least one floor surface or stair tread present in a common area?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

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Was at least one single-surface dust wipe sample taken from a floor or stair tread in a common area?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was at least one single-surface dust wipe sample taken from a floor where a child under age 6 would likely come into contact with dust?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Using the lab results, was the arithmetic mean (average) for dust wipe samples collected from all floors less than 40 micrograms per square foot?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was at least one window present in a common area? If No, skip to Section 2B.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was at least one single-surface dust wipe sample taken from an interior window sill in a common area?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was at least one single-surface sample taken from an interior windowsill where a child under age 6 would likely come into contact with dust?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Using the lab results, was the arithmetic mean (average) for dust samples collected from all interior windowsills less than 250 micrograms per square foot?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2B COMPOSITE DUST WIPE SAMPLING OF DWELLING UNITS		
Were composite dust wipe samples collected in dwelling units? If No, skip to Section 2C.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was at least one composite dust wipe sample taken for floors that consisted of 1 dust wipe from the main entryway and 3 dust wipes from rooms or areas where a child under age 6 would likely come into contact with dust?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Were the lab results for all composite samples collected from floors less than 25 micrograms per square foot?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was at least one composite taken for windowsills that consisted of 4 dust wipes from windows most frequently operated or from rooms or areas where a child under age 6 would likely come into contact with dust?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was the lab result for all dust samples collected from interior windowsills less than 125 micrograms per square foot?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was at least one composite taken for window troughs/sills that consisted of 4 dust wipes from windows most frequently operated or from rooms or areas where a child under age 6 would likely come into contact with dust?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was the lab result for all dust samples collected from window wells/troughs less than 400 micrograms per square foot?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2C SINGLE-SURFACE DUST WIPE SAMPLING OF DWELLING UNITS		
Were single-surface dust samples collected from dwelling units? If No, skip this Section.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Were at least 4 separate, single-surface dust wipe samples taken from floors in rooms and areas where a child under age 6 would likely come into contact with dust?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was any single-surface dust wipe sample taken from a floor of a dwelling unit equal to or greater than 40 micrograms per square foot?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Using the lab results, was the arithmetic mean (average) for all single-surface dust samples collected from all floors less than 40 micrograms per square foot?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was at least 1 single-surface dust wipe sample taken from a window trough of the window most frequently operated or where a child under 6 is likely to come into contact with dust?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was the lab result for all single-surface dust samples collected from all window troughs less than 800 micrograms per square foot?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Excluding the window from which a trough/well sample was taken, were at least 4 separate, single-surface dust wipe samples taken from interior windowsills in rooms and areas where a child under age 6 would likely come into contact with dust?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was any single-surface dust wipe sample taken from an interior windowsill of a dwelling unit equal to or greater than 250 micrograms per square foot?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Using the lab results, was the arithmetic mean (average) for all single-surface dust samples collected from all interior windowsills less than 250 micrograms per square foot?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

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H0042 - Lead Registry Form
MHO graphics 6/26/03

DISCLAIMER:

By applying for the Primary Prevention Program and meeting the eligibility requirements for funding, the property owner grants permission to the City for a lead hazard inspection and abatement, if necessary. All inspections and re-inspections will be done in accordance with Wis. DHS 163.42(2). Eligibility for funding for these activities is subject to specific requirements. Reasonable expenses are to be paid directly to the approved, qualified contractor by the City, up to \$40,000 per unit. Any repairs, unrelated to lead abatement, will not be covered by the grant money or the City.

If any work or damage is done that disturbs any painted surface on the interior or exterior of a building or some disturbance of bare ground around a building in the Lead Safe Registry, a re-inspection must be done in order to maintain a valid Lead Safe certificate. Activities that disturb surfaces include, but are not limited to:

1. Sanding, scraping or blasting of walls, ceilings, floors
2. Wall repairs and water damage repairs greater than 2 sq. feet
3. Stripping painted woodwork with heat guns or chemicals
4. Window repair or replacement
5. Welding of painted surfaces
6. Power washing of the exterior surface of the building
7. Carpet replacement
8. Disturbance of bare ground outside the building

The Lead Safe Registry is a voluntary listing and as such, is dependent upon participants to keep information up to date and to request re-inspections after surfaces are disturbed. The City takes no responsibility for the accuracy of this registry beyond the date of the inspection.

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H2042 - Lead Registry Form

MHO graphics 6/28/03

LAND MANAGEMENT SYSTEM (LMS)

Records

All Records ▼

Showing 1-20 of 200+ | [Download results](#)

Date	Record Number	Address	Project Name	Status	Record Type	Related Record
09/20/2023	HLORD-23-00517	4322 W CENTER ST, MILWAUKEE, WI 532102406 3070907000	Health Order Violation	Re-Inspect	Health Order Violation	1
09/19/2023	HLORD-23-00515	1459 N 37TH ST, MILWAUKEE, WI 532082317 3661701000	Health Order Violation	Open	Health Order Violation	2
09/19/2023	HLORD-23-00514	2556 N 21ST ST, MILWAUKEE, WI 532061503 3250821000	Health Order Violation	Open	Health Order Violation	4
09/19/2023	HLORD-23-00513	2556 N 21ST ST, MILWAUKEE, WI 532061503 3250821000	Health Order Violation	Open	Health Order Violation	4

LAND MANAGEMENT SYSTEM (LMS)

- **Efficiency.** Previous cases had difficulties with timelines and scheduling for court. This was due to paper citations that were hand delivered either get lost or delayed resulting in cases being rejected once they pass the two year threshold.
- **Performance management.** LMS will allow LRA's to better track their own work, and it will allow for managers to run reports on the work in individual LRA's as well as the reports on the whole team.
- **Reporting.** LMS has significant reporting capabilities MHD didn't have previously. This is important for quality controls and internal auditing, which was a recommendation from the Public Health Foundation Follow-up audit
- **Access.** Civilians have open access to the LMS database which allows them to look a preexisting orders/violations on a property. Link can be accessed [here](#).

ACCELA CITIZEN ACCESS

- The public can access LMS via the following link to search for ALL existing property code violations and preexisting orders including health orders.
- <https://aca-prod.accela.com/MILWAUKEE/Default.aspx>

For all permit fees and submittal information, please see our Info Sheets page.
<https://city.milwaukee.gov/DNS/permits/DNSinfo>

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Advanced Search ▼

We are pleased to offer our citizens, businesses, and visitors access to government services online, 24 hours a day, 7 days a week. [Contact Us](#)

If you get a 404 - File or directory not found error after logging in, you need to clear your browser cache before logging in again.

Features Include:

- Schedule inspections online
- Review the record status and inspections results online
- Upload drawings, correspondence, photos and plans electronically
- Pay online after all regulatory or reviews have been met

[DNS Record Search](#)- View instructions for searching records.

IMPORTANT NOTE: Historical records from 2016 and earlier have been migrated to LMS and have an "-H" at the end of the record number.

What would you like to do today?

To get started, select one of the services listed below:

Sign In

USER NAME OR E-MAIL: *

PASSWORD: *

[Forgot Password?](#)

Sign In

☐ Remember me on this device

ESCALATED ENFORCEMENT

Shorten response time to prevent poisoning

- 30 day, 60 day, 90 day re-inspections

Reduce hazards to prevent household displacement

- Interim controls
- HEPA vacuum
- Lead Safe kits



OPERATIONS IMPROVEMENT

- **Enforcement infrastructure.** The process has been electronically streamlined to input data from MHD in real time to the City Attorney's office and then to the Municipal court. This ensures the timetable stays within frame and cases are less likely to get delayed.
- **Staffing.** HEH will provide efficiencies by creating critical positions and keeping most of the inspection functions in house so there are no delays and improved accuracy. (Housing Compliance Officers)
- **Future strategy.** HEH will evaluate other enforcement tools available to us as appropriate including rent withholding, referral for condemnation, placards, and special assessment / divestment

ENFORCEMENT COLLABORATIONS

- **Milwaukee District Attorney** for escalation from civil > criminal cases for difficult property owners and LLC's
- **DATCP** to address repeat violations to Lead Disclosure Rule
- **Community housing partners** to deal with temporary housing for incidental displacement of people affected during the enforcement process
- **Private and philanthropic organizations** for proactive lead abatement and enforcement (Cleveland model)

INSPECTION FEES

Data obtained from
07/03/23 to Current

**Total fees
collected thus far
is \$6,150.00**

Date	Record	Fee
07/14/2023	HLORD-23-00211	150
07/14/2023	HLORD-23-00254	150
8/21/2023	HLORD-23-00270	150
8/21/2023	HLORD-23-00106	150
8/25/2023	HLORD-23-00211	300
8/30/2023	HLORD-23-00233	300
9/1/2023	HLORD-23-00258	150
9/1/2023	HLORD-23-00401	150
9/7/2023	HLORD-23-00317	150
9/15/2023	HLORD-23-00140	150
9/21/2023	HLORD-23-00106	300
9/22/2023	HLORD-23-00389	150
9/25/2023	HLORD-23-00307	150
9/25/2023	HLORD-23-00062	150
9/25/2023	HLORD-23-00118	150

ENFORCEMENT CHALLENGES

- **Financial burden:** Renovation costs and societal costs go hand in hand while dealing with enforcement.
- **Regulatory:** difficulties with scheduling inspections with tenants and landlords, creates program barriers. In addition to out of state landlords, and lack of current ownership.
- **Screening:** Screening rates continue to be low.