

LEAD-SAFE ECOSYSTEM CASE STUDY ANALYSIS



INTRODUCTION

As part of a larger evaluation of Detroit's lead-safe ecosystem, the City of Detroit's Housing & Revitalization Department approached University of Michigan - Poverty Solutions in early 2021 to identify best practices in ecosystems from other cities.

We define a lead-safe ecosystem as the system of actors who engage in—or are otherwise impacted by—activities related to reducing the risk of, or mitigating, child lead poisoning (including non-profit organizations, governmental bodies, landlords, families, etc.), as well as the conditions under which these actors must operate (including laws and policies, housing stock conditions, etc.). The term “lead-safe” as used in this memo refers exclusively to lead hazards in homes due to the presence of lead-based paint. Lead, too, can be present in soil, water, and other sources, though the reduction of risk of harm from these sources is not the focus of this analysis.

This memo highlights key features from the lead-safe ecosystems in Cleveland, Ohio and Buffalo, New York. These cities were selected as case studies relevant to Detroit based on having: similar housing stock conditions, including pervasive lead-based paint hazards; recent success with lead-safe programming, policies, and initiatives; and reputations for robust lead-safe ecosystem involvement. In this memo, we highlight key features that appear to have contributed to the successful function of lead-safe ecosystems in these peer cities.

The findings of this memo are based on 30 interviews (25 in Detroit, three in Cleveland, and two in Buffalo) from key actors in these cities' lead-safe ecosystems, analyses of relevant news articles and reports, and reviews of Buffalo's “Get Ahead of Lead” and Cleveland's “Lead Safe Cleveland Coalition” websites.

EXECUTIVE SUMMARY

Learning from Cleveland and Buffalo's lead-safe ecosystems, Detroit's own ecosystem may be made more robust by establishing structures and mechanisms that encourage broad stakeholder involvement and provide a variety of resources, services, and supports to accommodate the breadth of stakeholders, while still fostering accountability. A trusted actor that regularly convenes stakeholders and coordinates activities across the ecosystem is central to developing the communications and data sharing needed for progress. Additionally, certain features of Cleveland and Buffalo's lead-safe ecosystems, such as organizational and individual capacity, and unified public messaging facilitate lead-safe progress in these cities.

BEST PRACTICES IN LEAD-SAFE ECOSYSTEMS:

1. A trusted actor managing the regular convening and coordinating the relationships and activities of actors across the lead-safe ecosystem
2. Committee-based coalition structure for coordination between actors
3. Engagement from actors representing all areas of the lead-safe ecosystem
4. Variety of resources, services, and support, and centralized intake process for access
5. Available and accessible data to better understand the extent of the issue and to develop, support, and evaluate lead-safe initiatives
6. Effective mechanisms of accountability
7. Action following community interest
8. Focus on interim controls instead of full abatement

IDENTIFIED BEST PRACTICES IN LEAD-SAFE ECOSYSTEMS

1. A trusted actor managing the regular convening and coordinating the relationships and activities of actors across the lead-safe ecosystem. This key actor assumes the responsibility of carrying out the project management activities to move the work forward.

This role is typically fulfilled by a non-governmental entity. One Cleveland interviewee discussed that having a cohesive local lead-safe initiative led by a community-based organization demonstrates that lead poisoning is a community issue, not solely a government issue. One Detroit interviewee mentioned that a community-based organization may provide more stability than a governmental entity for sustaining this work (less pressure to change policy priorities, fewer restrictions on activities, etc.).

This central actor is established as a community-trusted organization, with extensive connections and meaningful relationships with actors within and outside of the lead-safe ecosystem locally, state-wide, and nationally. In Cleveland and Buffalo, these organizations prioritize, but do not focus exclusively, on lead poisoning. These organizations are able to leverage their networks from other priority areas to recruit and better engage a broader group of actors into the lead-safe ecosystem, such as financial institutions and local news organizations.

2. Committee-based coalition structure for coordination between actors

The key actor described above is primarily responsible for managing an organized coalition. Enterprise convenes the Lead Safe Cleveland (LSC) Coalition and the Community Foundation for Greater Buffalo (CFGFB) convenes the Buffalo and Erie County Lead Safe Task Force in Buffalo. These coalitions follow a committee/working group structure:

- The LSC Coalition includes a steering committee overseeing several working committees (with committee chairs), ad hoc committees, and boards (see Appendix A). The steering committee includes City of Cleveland representatives, committee chairs, civic leaders, at-large members, and individuals directly impacted by lead.
- The Task Force was originally composed of selected members and required to include representatives from the City of Buffalo, Erie County government, the Buffalo Public Schools, the medical community, non-profit leaders, philanthropy, property owners, parents, and the Western New York Coalition to Prevent Lead Poisoning. The Task Force oversees working groups (with working group chairs), which are more open to community involvement.

- The Task Force was developed to ensure recommendations from [Buffalo's 2018 Lead Action Plan](#) were implemented. The LSC Coalition's steering committee provides strategic guidance over the Coalition and its [committees](#), among other functions.
- Committees/working groups focus on housing policy, community outreach, research and evaluation, resource development, and workforce development. Interviewees mentioned that committees/working groups developed "organically," often in response to work already being done by current actors and community needs. Committees/working groups generally determine their own scope of work based on community needs, coalition capacity, and overarching goals established by an annual Coalition/Task Force action plan or progress report.
- General communications within the broader LSC Coalition/Task Force are conducted mainly by email or website updates. Committees meet monthly or every other month and are able to determine their own communication methods.

The committee/working group structure has contributed to "[improved rental housing policies, increased resources for remediation, and engaged tenants and property owners](#) in a way that reduces lead poisoning" in Buffalo. In Cleveland, for example, the Policy Committee helped to create recommendations and convene stakeholders for the development and eventual passage of the city's lead-safe certification legislation. The committee/working group chair's capacity can influence the progress of that group.

Interviewees discussed the importance of restructuring their respective Coalition/Task Force as needed. The Task Force is restructuring so that it is less selective with its membership in response to how the Task Force has evolved over time, and is reconsidering the housing policy working group since its goal of passing rental registration legislation has been accomplished. The LSC Coalition has already restructured from its first iteration (see Appendices A and B), and is reconsidering the Resource Development Committee after already reaching a fundraising goal and the Community Engagement Committee since the Lead Safe Resource Center (see 4. Variety of resources, services, and support, and centralized intake process for access) now accomplishes much of their work.

3. Engagement from actors representing all areas of the lead-safe ecosystem

While Detroit has involvement from local and state government, working groups, non-profit and community organizations, academic institutions, and parents concerned with healthy housing and energy efficiency, environmental public health, and resident and tenant rights, Cleveland and Buffalo have committed, systematic, and meaningful engagement from actors representing a broader range of

the lead-safe ecosystem. These actors include healthcare providers, public school systems, university systems, churches, lawyers and judges, community health workers, philanthropists, financial institutions, and private businesses within the community. This all-inclusive engagement is critical for developing and executing lead-safe strategies that are more holistic and have a wider-reaching impact than if actors operated independently.

Similar to Detroit, interviewees from both Cleveland and Buffalo detailed difficulties in attracting engagement from landlords. The coalitions in these cities continue to develop strategies to better reach landlords, including redirecting more resources towards these activities, using human-centered design approaches, improving communications between the City and landlords, and reframing landlords as necessary partners to ending lead poisoning.

4. Variety of resources, services, and support, and centralized intake process for access

Adhering to their multi-stakeholder, collaborative approach, Cleveland and Buffalo provide a variety of resources, services, and support to residents, landlords, lead professionals, and others. Interviewees emphasized continuously expanding these supports and adapting or modifying these supports to best fit the intended audience.

Resources, services, and supports include:

- Generally: A centralized website, lead prevention hotline, and/or brick-and-mortar resource center for real-time assistance from a knowledgeable representative;
- For residents: Resident education materials and events, resources for exercising tenant rights, home visits, and access to support from community health workers when engaging with city processes;
- For landlords: Various funding sources beyond HUD-based grants (healthy housing generally, weatherization and energy efficiency, loan fund, etc.), lead education classes, free Renovation, Repair and Painting classes, and policies temporarily preventing penalization if landlords are shown to be actively working with the City to make rental homes lead-safe.

The website, hotline, and brick-and-mortar resource center are easily accessible, initial points-of-entry to all of a city's resources, services, and support. These centralized intake routes remove the administrative burden from residents, landlords, and other stakeholders to search and evaluate these supports themselves, and prevent non-profit and other organizations from allocating limited resources to understanding and assisting residents with these supports independently.

5. Available and accessible data to better understand the extent of the issue and to develop, support, and evaluate lead-safe initiatives.

Cleveland and Buffalo are able to access governmental data related to child lead poisoning rates and, in some cases, collect needed data through research. These cities are able to leverage this data to demonstrate the need for funding and other resources, to design services, outreach, and other initiatives that are more apt to stakeholder needs, and to evaluate current lead-safe initiatives.

In Cleveland, the LSC Coalition is able to publicly share governmental data largely because one of its key members, Case Western Reserve University's Center on Urban Poverty and Community Development, had access to lead poisoning-related data through a pre-existing integrated data system on children and properties, and had established data use agreements prior to the LSC Coalition's founding. Created and maintained by the Center, Cleveland's coalition publicly shares the [Lead Safe Cleveland Coalition Data Dashboard](#) that provides key information on child lead poisoning rates, the lead safety of rental units, and more.

The Center, as an academic research center, is able to undertake research projects that are needed to forward the city's lead-safe initiatives. Such research projects include studies on the [relationship between early childhood housing-based lead exposure and kindergarten readiness](#), a study on the [socioeconomic outcomes for children with elevated blood lead levels](#) (EBLLs), and an [examination of rental properties and landlords](#) in the city.

Additionally, the Center was selected to monitor and evaluate the city's lead-safe initiatives and is able to collect, evaluate, and report on data related to these initiatives that inform further action.

One interviewee mentioned that the LSC Coalition's efforts would be considerably impeded if the Ohio Department of Health decided to no longer share necessary data. In Buffalo, aggregated information is publicly available, although the data is updated infrequently and is not publicly shared by the Task Force.

One Buffalo interviewee discussed the difficulty of obtaining this data from the New York State Department of Health and the lack of data sharing between the city and the county health department. To overcome these challenges, CFGB funds a state-wide coalition pressuring state legislators to amend state data-sharing practices and has facilitated data-sharing agreements between the city and county health departments.

CFGB also uses nongovernmental sources of data to target lead-safe initiatives. For example, based on local historical context and the direct experience of stakeholders working with community members, it is understood that many tenants, landlords, and the children most severely harmed by lead poisoning are new Americans. Consequently, CFGB has redirected resources towards targeted outreach for this group.

6. Effective mechanisms of accountability

Cleveland and Buffalo's lead-safe ecosystems employ several mechanisms not used or effectively used in Detroit that seek to hold actors accountable for carrying out commitments in lead-safe work. These include public accountability through news and media reporting, mandated regular progress reports to governmental bodies, and the creation of oversight systems by local ordinances.

- Media coverage regarding Detroit's housing market and the systems that influence it can be useful in holding the City government and other key stakeholders accountable for the impacts of their actions or in-actions.
- CFGB released a Lead Action Plan in 2018 that required the Lead Safe Task Force to prepare an annual progress report for the city mayor and county executive, as well as the community. This obligation provides CFGB with leverage to pressure actors into maintaining their commitments.
- CFGB is one of Buffalo's largest grantmakers and so is able to require the carrying out and evaluation of lead-safe activities in its related grant opportunities.
- [Cleveland's lead-safe legislation](#) created the role of the [Lead Safe Auditor](#) (independent of the City) charged with "monitor[ing] the progress and status of City of Cleveland's Lead Safe Certification program and other lead poisoning prevention efforts conducted by the City of Cleveland, and analyze and report on selected indicators....," and a [Lead Safe Advisory Board](#) required to "report quarterly on the progress and status of the certification efforts [and] complete an impact analysis of the lead safe certification program."

7. Action following community interest

Interviewees described a range of key events and activities that reinvigorated political interest in preventing child lead poisoning, and corresponding efforts that translated this political interest into sustained action.

- News and media coverage of child lead poisoning locally and nationally (e.g. the Flint and Benton Harbor water crises) have increased public awareness and prompted greater involvement from residents, non-profit organizations, and other actors. Interviewees expressed a belief that this momentum encouraged legislative change in Buffalo.
- Annual coalition reports and commissioned landscape studies clearly detailing the causes and consequences of child lead poisoning locally galvanize organizations, identify areas of focus for multi-stakeholder action, and provide strategic recommendations for concrete, immediate, and actionable next steps.
- In Buffalo, the New York State Attorney General's office redirected funding towards lead-safe initiatives after

a successful lawsuit against a large landlord who knowingly rented homes with lead hazards.

In both Cleveland and Buffalo, the primary catalyzing event for sustained, systematic progress in their current lead-safe ecosystems appears to be the reprioritization of and investment in preventing child lead poisoning by long-standing, resource-rich, local philanthropic organizations. Mt. Sinai Health Foundation in Cleveland and CFGB in Buffalo both conducted a broader strategic evaluation that informed which issue areas to engage, and identified child lead poisoning prevention as a priority because of its connection to several other priority issue areas (education, racial and ethnic equity, etc.) and the potential difference that could be made from significant investment.

The prospect of increased funding in child lead poisoning prevention efforts renewed interest, optimism, and involvement from local non-profit organizations. Mt. Sinai Health Foundation and CFGB began coalition-building efforts that sustained this enthusiasm and systematically encouraged further action (by identifying key actors, their responsibilities, and providing a forum for multi-stakeholder strategizing (see 2. Committee-based coalition structure for coordination between actors))

These and other events may occur regularly or sporadically, do not always create momentum for action, and may have a certain timeframe in which this momentum can be harnessed to effectively spur action.

8. Focus on interim controls instead of full abatement

Both Cleveland and Buffalo focus on interim controls for reducing paint-based lead hazards in homes, but recognize the benefits of full abatement. Interim controls were understood to have a broader and more immediate impact (and so are able to prevent cases of child lead poisoning as soon as possible) and be more accessible and desirable for landlords (as it is more affordable and easily funded) compared to full abatement. However, the effectiveness of interim controls relies on ongoing cleaning, maintenance, and monitoring, which requires adequate resident education and reliable enforcement of regular lead inspection requirements for rental units. One shortcoming of this approach, as identified by one interviewee, is that resident education on lead-safe cleaning and maintenance is not systematically provided.

The decision to focus on interim controls over full abatement in Cleveland was contentious, according to one interviewee. Enterprise presented research and data on the use, costs, and success of interim controls from other cities, particularly Rochester, to help stakeholders select a focus on interim controls. As Rochester was able to [reduce lead poisoning by over 90 percent in fifteen years](#), Enterprise believed that such reductions were also possible in Cleveland.

Interim controls also had the potential of being an initial entry point towards identifying and addressing other housing repair needs. For Enterprise and others, this generated interest in possibly creating new housing repair products that could be scaled or iterated to improve the city's housing stock.

FEATURES OF ROBUST LEAD SAFE ECOSYSTEMS

In addition to the best practices identified above, the following features of Cleveland and Buffalo's lead-safe ecosystems may inform efforts to augment or strengthen Detroit's own ecosystem.

1. Organizational and individual capacity is critical for driving progress.

Key organizations in these lead-safe ecosystems have sufficient resources or the ability to acquire resources for necessary activities. Enterprise has at least one full-time employee dedicated to LSC Coalition-related work, with significant time commitments from two other high-level employees. At the time of interviewing, Enterprise was seeking to hire another full-time employee dedicated to this work to meet capacity needs. CFGB is able to use its funding to create grants that support lead-safe activities (and to ensure accountability of grant recipients). Furthermore, both of these organizations have sufficient operational funding to reject outside funding that may not align with their values. Additionally, these organizations had pre-existing working relationships with some of the key actors in their lead-safe ecosystems from other contexts that facilitated their coalition-building around lead-safe priorities.

The capacity of individuals in key positions plays a significant role in realizing an organized coalition's potential to prevent child lead poisoning. At CFGB, the Senior Director of Policy and Strategic Partnerships facilitating the convening of the Task Force is able to leverage her extensive network and over 20 years of experience in community leadership to involve local, state, and national partners in Buffalo's lead-safe initiatives. One key individual in Buffalo serves both as one of the main doctors providing chelation therapy in the city as well as the Co-Medical Director at Buffalo Public Schools. This individual is able to involve both the medical community and public school system (two stakeholders generally difficult to engage in Detroit). In Cleveland, the former Vice President, Ohio Market Leader at Enterprise leveraged his experience of 35 years in the Cleveland housing sector to bring together organizations and facilitate conversations around this historically contentious issue (which contributed to the trusted position of Enterprise Community Partners in this ecosystem). Lead-safe progress in these cities may not have occurred as quickly or easily without these individuals. The influence of individual capacity is also seen in roles related to data collection and analysis, workforce development, community relations, and more.

2. Long-term, consistent involvement of key organizations

Cleveland and Buffalo (as well as Detroit) interviewees all discussed the need for continuous, committed stakeholder involvement to maintain traction in this space. As key actors in this ecosystem balance competing priorities or may experience turnover, the consistency and steadfastness of organizations such as Enterprise and CFGB ensure that ecosystem-wide efforts continue.

3. Overcoming ecosystem politics

Preventing child lead poisoning is a decades-long issue that imposes costs, benefits, and other consequences to various stakeholders. Consequently, the lead-safe ecosystem is not exempt from fierce politics that may hinder progress, such as discouraging needed involvement from peripheral or new stakeholders. The organization assuming the role as a trusted actor and key individuals (as discussed in Sections III-A and IV-B, respectively) are essential for reconciling these politics and facilitating cooperation for concerted action.

4. Stronger code enforcement

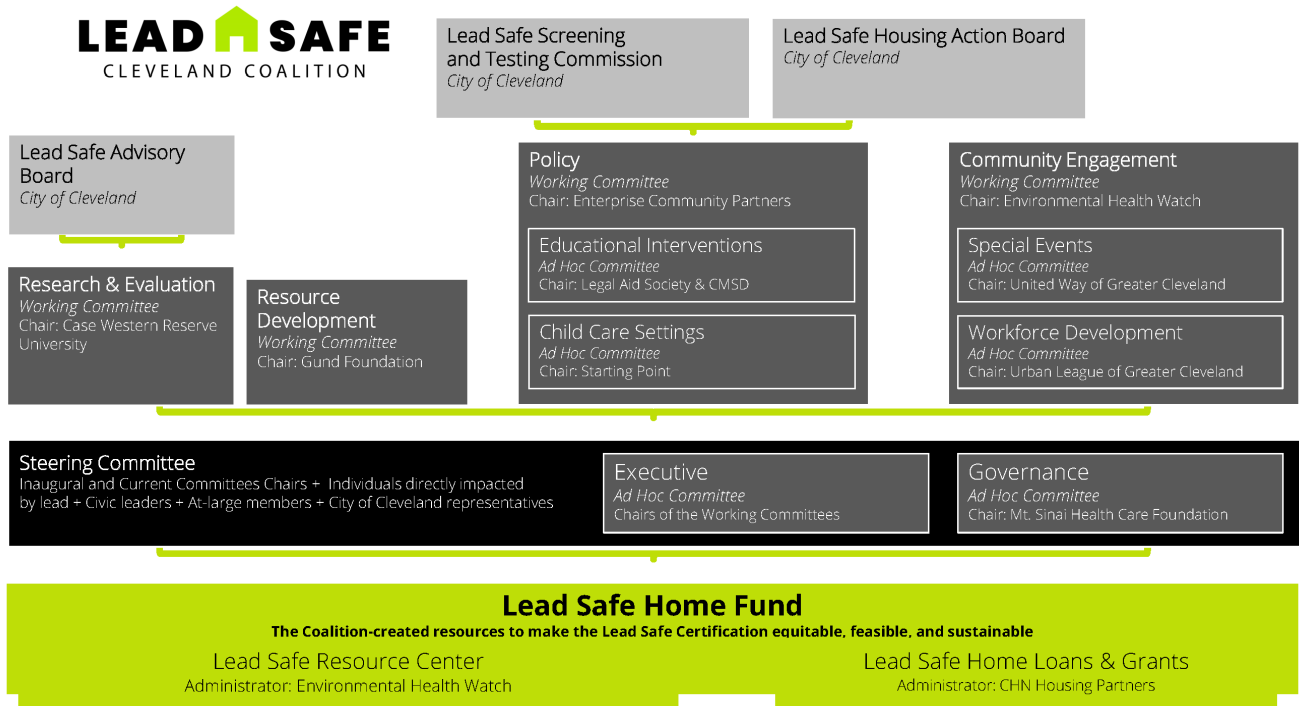
Similar to Detroit, Cleveland and Buffalo would benefit from stronger code enforcement mechanisms, as evidenced by low code compliance rates. These are due to several factors: the COVID-19 pandemic, relatively recent implementation of lead-safe policies, ineffective or insufficient consequences for landlords failing to comply, some landlords believing they are already compliant, and limited governmental capacity and coordination between relevant departments. Interviewees from both Cleveland and Buffalo emphasized developing a "carrot-and-stick" approach: providing incentives and supports to landlords to promote code compliance (lead-safe requirements are not an "unfunded mandate"), but a reliable expectation of consequences for failing to do so (e.g. fines). One Cleveland interviewee explained that financial products for landlords do not encourage compliance, but that enforcement encourages compliance (the "stick"). The financial products then become an additional incentive to comply (the "carrot").

In Cleveland, interviewees discussed the development of creative enforcement mechanisms. For example, because lead-safe certification for a property is not directly connected to the City's rental registration, the Lead Safe Resource Center ensures that landlords and property owners seeking lead-safe certification also receive assistance with rental registration, and vice-versa. Cleveland's housing court also prevents landlords from moving forward with an eviction filing if the property is not registered with the City and does not have a lead-safe certificate.

5. Consistent ecosystem-wide public messaging

In Cleveland, Enterprise issued an RFP for a marketing and communications consultant to ensure uniform public messaging across the coalition, which prevents organizations from allocating limited resources to developing separate messaging that may confuse residents.

APPENDIX A. LEAD SAFE CLEVELAND COALITION 2022 ORGANIZATIONAL CHART



APPENDIX B. LEAD SAFE CLEVELAND COALITION 2020 ORGANIZATIONAL CHART

