



11101

## MEMORANDUM

JUN 12 2020

From: *Anthony Williams, CAPT*  
A. W. Williams, CAPT  
Acting COMDT (CG-13)

To: Distribution

Thru: (1) CG PSC PSD fs Housing

Subj: AUTHORIZED EXCEPTIONS FOR SAFE HOMES INITIATIVE (SHI) HOUSING ASSESSMENTS

Ref: (a) ALCOAST 072/20  
(b) ALCOAST 189/20  
(c) My Memo of 16 Dec 2019

1. This memo provides new guidance for policy promulgated in references (a) and (b), and updates guidance contained in reference (c).
2. Due to complications presented by the COVID-19 pandemic, Safe Homes Initiative (SHI) environmental risk assessments of Coast Guard-owned housing have been delayed in many locations. As a result of these unforeseen delays, some at-risk families in receipt of PCS orders to remote seasonal type locations may not be able to find suitable community based housing. Reference (a) restricted assignment of at-risk families to Coast Guard-owned housing constructed prior to 1979 that have not been assessed and determined to be in compliance with current federal environmental standards, and outlined several housing flexibility options.
3. In the event these housing flexibility options are not feasible, reference (b), amends previous guidance to allow Area Housing Authorities, to request a waiver to assign an at-risk family to pre-1979 constructed Coast Guard-owned family housing that is pending assessment. In addition to the guidance promulgated in reference (b), requests shall adhere to the following procedures:
  - a. Waivers are a last resort, and will be considered on a case-by-case individual family basis. Waiver requests must demonstrate that all other housing flexibility options have been thoroughly explored and determined to not be viable, including release from mandatory assignment to housing or assignment to a government Coast Guard lease. Reference (a) and Enclosure (1) provide amplifying information on housing flexibility options.
  - b. Waiver requests shall be submitted to CG-1, as the waiver authority, via the chain of command, and be routed thru CG PSC-PSD and CG HSWL-SC for endorsement. Enclosure (2) is a sample waiver request memo. The CG SHI Tri-P will review waiver packages and make a recommendation for CG-1 determination.
  - c. Prior to submitting a waiver request, a pre-occupancy inspection shall be physically performed by a Safety and Environmental Health Technician under the direction of a Safety and

Subj: AUTHORIZED EXCEPTIONS FOR SAFE HOMES INITIATIVE (SHI) HOUSING ASSESSMENTS

Environmental Health Officer and assisted by the Area Housing Officer, Local Housing Officer, and Owned-Housing Maintenance Coordinator. The pre-occupancy inspection shall identify any potential risks such as damaged or deteriorated surfaces in accordance with reference (b). The pre-occupancy inspection shall also include surface lead dust wipe sampling to provide additional assurance regarding the safety of homes for families. The results of the pre-occupancy inspection and dust wipe sampling shall be included with the waiver request. Enclosure (3) is the HSWL-SC SHI Hazard Classification Validation CONOP for the pre-occupancy inspection. Funding for materials and travel related to the pre-occupancy inspection must be coordinated with Mr. Canfield at CG PSC PSD fs Housing.

d. Reference (b) directs homes be thoroughly cleaned prior to occupancy. Enclosure (4) is a CG Safety & Environmental Health Bulletin with helpful links for COVID-19 Environmental Cleaning & Disinfection

4. Previous guidance promulgated in paragraph 2.d. of reference (c) assigned responsibility for the decision on whether to relocate a family to the Area Housing Authorities. Based on senior leadership direction, paragraph 2.d. of reference (c) is amended to re-assign responsibility for determining whether to relocate a family to COMDT CG-13. All other provisions of reference (c) remain the same.

5. Thank you again for your continued support and collaboration. Please feel free to contact me directly if you have any questions.

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Enclosure: (1) Concurrent Family Quarters Assignment / Basic Allowance for Housing Payment  
(2) Sample SHI Assignment Waiver Request Memo  
(3) CONOP SHI Hazard Classification Validation  
(4) COVID-19 Safety & Environmental Health Cleaning & Disinfection Bulletin

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Subj: AUTHORIZED EXCEPTIONS FOR SAFE HOMES INITIATIVE (SHI) HOUSING  
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## **Deputy Commandant for Mission Support Issue Paper**

**Subject:** Concurrent Family Quarters Assignment and Basic Allowance for Housing (BAH) Payment

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### **BLUF:**

While other preferred administrative tools exist for flexibility in dependent PCS travel and CG-Owned family housing assignment, there is a mechanism that would allow for assignment of a member & dependents to family housing and temporary authorization for payment of Basic Allowance for Housing (BAH).

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### **Background**

The Coast Guard launched the Safe Homes Initiative (SHI) in 2019 following the discovery of elevated lead levels at several Coast Guard housing sites. Additionally, new federal lead standards came into effect in January 2020. Homes built before 1979 (when the use of lead-based paint was allowed) are the most likely to not comply with the more stringent lead dust standards.

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### **Current Status**

Due to complications presented by COVID-19, Safe Homes Initiative (SHI) contracted state certified risk assessments of CG housing have been delayed in many locations. Previous guidance promulgated barred assignment of at-risk families to CG homes constructed prior to 1979 that have not been assessed and determined to be in compliance with the new 2020 EPA lead dust standards. Due to the delays and restrictions, at-risk families (defined as pregnant women and children under the age of seven) in receipt of AY20 PCS orders may not be able to locate suitable community based housing at their new PDS. There are several options to assist Commands and inbound families in these circumstances where there are CG-owned housing to which members with dependents would be assigned but for not having received state-certified environmental risk assessments. These options, in priority order, include the following:

- Flexible Policy during Assignment Season:
  - Commands work through PSC to delay PCS reporting;
  - Assign members to unaccompanied personnel housing (UPH) while continuing to pay BAH-W, allowing dependents to remain at the previous PDS. (authorized by Family Stability Act for PCS within the 50 states & District of Columbia);
  - Authorize Delayed Dependent Travel for PCS to/from CONUS to OCONUS PDS;
  - Extended Temporary Lodging Allowance (TLA) beyond 60 days (OCONUS only).
  - If assignment to UPH is not available or impractical under the circumstances, assign members with dependents to family quarters that have not received state-certified environmental risk assessments and issue an order to prevent dependents in the at-risk category from occupying those quarters. Under these conditions, BAH-W may be paid per Title 37 U.S.C § 403(e)(5).
  - Waiver Request - In the event these options are not feasible, the Coast Guard is amending previous guidance to allow Area Housing Authorities, on a case by case basis, to request a waiver to assign an at-risk family to pre-1979 constructed Coast Guard owned family housing that is pending assessment. CG-13 will send detailed guidance on the waiver process to Area Housing Authorities separately.

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**Next Steps / Action Items**

Issue ACN to integrate the housing assignment flexibility options outlined above.

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11101

Date

## MEMORANDUM

From: B. D. Incharge, CAPT  
Local Housing Authority Unit

To: COMDT (CG-133), (CG-113), (CG-43)  
Thru: (1) CG BASE XXXXXX (AHA) (if not originated by AHA)  
(2) CG HSWL-SC  
(2) CG PSC PSD fs HMS

Subj: REQUEST TO ASSIGN AN AT-RISK FAMILY TO COAST GUARD OWNED  
HOUSING UNIT

Ref: (a) ALCOAST 072/20  
(b) ALCOAST 189/20  
(c) COMDT (CG-133) memo 11101 of 16 Dec 2019  
(d) Surface Wipe Sampling Protocol

1. I request a waiver to allow MEMBER NAME (i.e., BM2 Michale Shipmate, EMPLID 0011011) be assigned to housing at ADDRESS (i.e., 11101 South Housing Drive, Loyola, DE, HU# 0501673), a pre-1979 Coast Guard owned housing unit that has not yet completed the required state certified Safe Homes Initiative (SHI) environmental risk assessment (ERA). The contract to complete the ERA Assessment was awarded on DATE, but will not be completed with results until DATE, which is after the family's arrival. NAME's family is aware of this and is requesting permission to move into the home prior to completion of an assessment.

2. Under the SHI, the family meets the definition of an at-risk family. Reference (a) authorizes Area Housing Authorities (AHAs) to release at-risk families in receipt of PCS orders from mandatory assignment to pre-1979 Coast Guard owned housing that has not received a SHI assessment. Allowing the member and family to move into this housing unit at their request will help mitigate the stress of a PCS move, which is compounded by the low availability of suitable community based housing.

3. We have performed the following mitigation steps:

a. While not intended to replace the state certified Risk Assessment by a licensed professional, a pre-occupancy inspection was conducted to identify common risks such as: chipped or peeling paint, cracked or broken floors tiles, and areas deemed hotspots for environmental hazards. The pre-occupancy inspection team including a Safety and Environmental Health Technician under the direction of a Safety and Environmental Health Officer, assisted by the Area Housing Officer, Local Housing Officer, and Owned-Housing Maintenance Coordinator inspected the interior and exterior of the housing unit to identify common potential risks. In addition, the team conducted lead dust wipe sampling in accordance

Subj: REQUEST TO ASSIGN AN AT-RISK FAMILY INTO COAST GUARD OWNED HOUSING UNIT

with reference (d). The preliminary results of the dust wipe samples indicate that the home is within federal lead dust standards. The inspection was properly documented using the Quarterly Inspection Checklist, Form CG-6089.

b. Prior to occupancy, the housing unit will receive a thorough cleaning and wipe down to ensure no dust residue remains.

c. The family will be counselled that at-risk family members should not come into contact with grounds that have bare spots pending soil sampling data from the contracted assessment.

4. The family understands that if there are any ERA hazards identified, they may be temporarily or permanently relocated to allow for any remediation action required.

5. My point of contact is [REDACTED].

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Enclosure: (1) Dust Wipe Sampling Results  
(2) Quarterly Inspection Checklist, Form CG-6089

Copy to: CG DOL or CG FORCECOM, as appropriate



# COVID-19 Environmental Cleaning & Disinfection

COVID-19



SAFETY & ENV HEALTH BULLETIN

**NOTE: Supersedes Safety Bulletin – Shore Facility Decontamination dated 24 March 2020.**

Environmental cleaning and disinfection are necessary to help prevent contact transmission of COVID-19. Coast Guard personnel are capable of cleaning and disinfecting their unit following the guidance listed below. SILC recommends units review janitorial contracts for compliance with GSA requirements in accordance with [DHS Workforce Guidance](#) (pg 22). The Unit Safety Officer should identify appropriate levels of cleaning and disinfection for spaces previously occupied by an infected person. The [CO's Quarantine and Isolation Procedures Guide](#) addresses continued occupancy by infected crew

## Cleaning & Disinfection Tips

- Use EPA-registered disinfecting agents per manufacturer's guidance.
- Review guidance & safe work practices before cleaning.
- Use the prescribed PPE, properly don & doff PPE, & follow decontamination / disposal procedures.
- Wash your hands often & immediately after removing gloves.

<b>Applicable Standard</b>	Workplace sanitation is governed by the OSH Act, 29 CFR 1910.141, "All places of employment shall be kept clean to the extent that the nature of the work allows."
<b>EPA List of Registered Disinfectants</b>	<a href="https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2">https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2</a>
<b>Routine Preventative Disinfection Procedures</b>	<a href="https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html">https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html</a>
<b>COVID-19 Disinfection Procedures</b>	<a href="https://www.cdc.gov/coronavirus/2019-ncov/prepare/disinfecting-building-facility.html">https://www.cdc.gov/coronavirus/2019-ncov/prepare/disinfecting-building-facility.html</a>

## Time as a Hazard Control

The risk of transmission from a contaminated surface decreases with time. If a COVID-19 person has been present in the workplace, the level of cleaning required to reoccupy a facility decreases over time, ([DHS Workforce Guidance](#), pg. 20).

Time Elapsed after COVID (+) Departed Space	Areas to Perform Cleaning & Disinfection Procedures (coordinate with facility manager)
Immediately After Discovery	Secure the space to building occupants and ventilate/open doors windows. Wait 24 hrs.
After 24 hours	Clean all contact areas using detailed or deep cleaning procedures.
After 4 days	Workplace can be cleaned using routine COVID-19 cleaning and disinfection procedures.

## Asset & Facility-Specific Guidance

<b>Afloat Assets</b>	Afloat crews shall clean and disinfect all high touch surfaces every watch change and all occupied ship's spaces daily via <a href="#">SFLC Engineering Advisory 005-20</a> . Product Line / Asset Class guidance can be found on Maintenance Procedure Cards via the <a href="#">Surface Technical Information Portal</a> .
<b>Aviation Assets</b>	Aircraft Model/Series & Asset guidance can be found on Maintenance Procedure Cards via the <a href="#">Aviation Technical Information Portal</a> . For additional questions, contact the Capability Manager or Aviation Safety Program.
<b>Galley / Dining Facilities</b>	Galley / Dining Facility guidance can be found in the <a href="#">Enhanced Sanitation Practices for Food Establishments</a> Announcement via the <a href="#">Culinary Specialist Rating Portal</a> .
<b>Motor Vehicles</b>	<a href="https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/disinfecting-transport-vehicles.html">https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/disinfecting-transport-vehicles.html</a>





# Health, Safety and Work-Life Service Center Safety & Environmental Health Division

## SHI Hazard Classification Validation CONOP



### Background

In 2019, the Coast Guard launched the Safe Homes Initiative, a service-wide effort to evaluate Coast Guard housing compliance with federal regulations including updated EPA Action Levels (AL) for lead in surface dust. Initially, efforts included review of housing documentation (inspections, abatements, etc.) and visual inspections of lead-containing paint by housing program staff to identify housing units that may contain lead hazards. Additionally, the Coast Guard has contracted state-certified risk assessments for all homes built before 1979, which will determine the presence, type, severity, and location of lead-based paint hazards (including in paint, dust, and soil) and will provide suggested ways to control them.

However, the COVID-19 pandemic has prevented timely execution of contract risk assessments. Therefore, families are being assigned to Coast Guard-owned housing units, where the current hazard classification for lead-containing dust has not been validated. Families may be administratively assigned to pre-1979 housing units, but will not be allowed to move in until compliance with lead AL have been validated. Subsequently, DCMS requested surface wipe sampling to validate the hazard classification prior to contract risk assessments to allow members and families to move into housing units.

Lead Hazard Classification	Definition
Monitoring Level	The concentration or physical condition of lead does not pose a health risk to persons or does not require corrective actions. However, lead must be periodically monitored (at least annually) by housing staff to ensure that conditions have not changed. This is normally accomplished during the annual visual assessments performed by Local Housing Officers (LHO) and/or Area Housing Officers (AHO).
Action Level	The concentration or physical condition of lead may pose an increased human health risk. Findings at the action level require corrective actions per paragraph B.6.d of CIM 5100.47C Chapter 25, to reduce the level to/or below the monitoring level.
Major Finding	A major level finding indicates that the concentration or physical condition of lead materials pose an immediate health risk to occupants (esp. sensitive populations) that require immediate correction.

### Scope

HSWL SC (se) will conduct lead surface dust wipe sampling to help Area Housing Authorities (AHA) and housing program staff validate hazard classifications at 31 Coast Guard-owned housing units. These units were pre-identified by CG-1333 as possibly not meeting the updated EPA AL and AHAs have confirmed that contract risk assessments are delayed and will not be completed prior to occupancy by transferring members and families. The lead surface dust wipe sample results coupled with the housing staff inspections will provide AHAs with the information needed to make risk-based decisions regarding allowing occupancy of housing units prior to contract risk assessments.

**NOTE: HSWL SC(se) personnel conducting surface dust sampling are not state-licensed and will not perform comprehensive Lead-Based Paint Inspections or Risk Assessments meeting EPA requirements. Therefore, findings from these visits do not represent a comprehensive evaluation of lead risk and the sample results are only intended to assist AHAs in validating their previously documented hazard classifications.**

**Evaluation  
Criteria**

In January 2020, EPA lowered the housing dust-lead hazard standards from 40 micrograms of lead per square foot ( $\mu\text{g}/\text{ft}^2$ ) to 10  $\mu\text{g}/\text{ft}^2$  on floors and from 250  $\mu\text{g}/\text{ft}^2$  to 100  $\mu\text{g}/\text{ft}^2$  on window sills to protect children’s health. The more protective lead dust hazard standards apply to inspections, risk assessments, and abatement activities in pre-1978 housing and certain schools, child care facilities and hospitals. The surface dust samples collected during these visits will be analyzed by accredited laboratories and compared to the standards listed in the table below.

EPA Lead Dust Hazard Standards ( $\mu\text{g}/\text{ft}^2$ )			
Hazard Class	Floors (Carpeted & Bare)	Interior Window Sills	Window Troughs (Wells)
Monitoring Level	< 10	< 100	< 400
Action Level	> 10	> 100	> 400
Major Finding	1) Action Level conditions are met 2) At-risk member ( <b>pregnant women or children &lt; 7 years</b> ) use the area.		

**Visits &  
Schedule**

Each visit will be completed by a Safety and Environmental Health Technician (SEHT) under the direction of a Safety and Environmental Health Officer (SEHO) and assisted by the Area Housing Officer (AHO), Local Housing Officer (LHO), and Owned-Housing Maintenance Coordinator (OHMC). The following tasks will be conduct for each visit:

**Pre-Visit**

- (1) Coordinate visit to ensure completion of all housing units in most efficient manner;
- (2) Housing staff assemble diagrams for each housing unit (all floors) and mark them to indicate presence of all LCP findings on each diagram;
- (3) Housing staff provide LCP marked diagrams and most recent annual ERA inspection report to SEHT at least one week prior to visit.
- (4) Housing staff confirm that housing units have been thoroughly cleaned and are free of visible dust on floors and window sills.

**Onsite Visit**

- (1) SEHT conducts visual LCP condition assessment to ensure monitoring level findings;
- (2) SEHT collects lead dust samples IAW Enclosure (1) at each housing unit;
- (3) SEHT prepares laboratory Chain of Custody and submits samples to the laboratory;
- (4) SEHT briefs stakeholders on any LCP conditions not meeting the Monitoring Level.

**Post Visit**

- (1) SEH Office receives/reviews laboratory analysis results;
- (2) SEH Office briefs unit and housing stakeholders on laboratory results;
- (3) SEH Office completes final sampling report within 14 days following receipt of laboratory results and distributes to stakeholders.

**Schedule:**

Visits are tentatively scheduled to begin on 21 JUN 2020 and end OOA 01 AUG 2020. Actual visit dates will be coordinated with the unit local housing staff.

District	Area Housing Office	Location	# Housing Units	Visit Dates
D1	Base Cape Cod	East Hampton	1	21 Jun – 01 Aug 2020
D7	Base Miami Beach	Borinquen	6	
D11	Base Alameda	Eureka	11	
D13	Base Seattle	Coos Bay	5	
D17	Base Kodiak	Valdez	8	
<b>Total</b>			31	

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**Cost Estimates**

CG-1333 will use Safe Homes Initiative to fund travel for these visits. An average of 30 surface dust samples will be collected per housing unit and submitted to an accredited laboratory for lead analysis. Sample analysis costs for a five day analysis turnaround is currently \$35.00 per sample. The estimated sample analysis cost for each housing unit is \$1,050. The table below contains the laboratory analysis cost estimates for each location. Sample analysis funding and contract support has been requested from USCG Director of Operational Logistics.

<b>Location</b>	<b># Housing Units</b>	<b>Samples/Unit</b>	<b>Total Samples</b>	<b>Total Cost</b>
East Hampton	1	30	30	1,050.00
Borinquen	6	30	180	6,300.00
Eureka	11	30	330	11,550.00
Coos Bay	5	30	150	5,250.00
Valdez	8	30	240	8,400.00
<b>Totals</b>	<b>31</b>		<b>930</b>	<b>32,550.00</b>

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**Workload & Impacts**

Each sampling evolution is expected to require approximately 40-hours for planning, execution and formal documentation. The total project workload is estimated at 1,240 hours, which is equivalent to annual direct workload for 1.0 FTE. Additional briefings and related tasks will add to this workload estimate.

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**HSWL SC POCs**

<b>Project Officer</b>	<b>CDR Lewis</b>	<b>(510) 437-3981</b>	<b>Jason.Lewis@uscg.mil</b>
<b>D1 SEHO</b>	LCDR Butler	(617) 223-3202	Ryan.Butler@uscg.mil
<b>D7 SEHO</b>	LT Foster	(305) 953-2370	Carrie.E.Foster@uscg.mil
<b>D11 SEHO</b>	LCDR Vanderlaske	(310) 521-6021	Steven.B.Vanderlaske@uscg.mil
<b>D13 SEHO</b>	LT Delauter	(206) 217-6341	Joseph.N.Delauter @uscg.mil
<b>D17 SEHO</b>	LCDR Osterink	(907) 487-5757	Beth.A.Oserink@uscg.mil

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