# U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT WASHINGTON, DC 20410-7000



OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

Notice: CPD-23-103

Issued: January 11, 2024

This notice will be effective 90 days after the date issued. For Tribes, Tribally Designated Housing Entities, and Department of Hawaiian Homelands Recipients, however, it will be effective two years after the date issued.

Expires: This Notice is effective until amended, superseded, or rescinded

Special attention of:
Regional Directors
Field Office Directors
CPD Directors and field office staff
OEE Directors and field office staff
PIH Directors and field office staff
Office of Housing Directors and division
staff
ONAP Administrators and field office staff
OLHCHH Directors and Healthy Homes
Representatives

Representatives
Program Environmental Clearance Officers
Responsible Entities
Public Housing Authorities

Tribes
Tribally Designated Housing Entities

SUBJECT: Departmental Policy for Addressing Radon in the Environmental Review Process

#### I. Purpose

The purpose of this Notice is to clarify that radon must be considered in the contamination analysis for 24 CFR Parts 50 or 58, as applicable; to provide guidance on recommended best practices for considering radon; and to identify the U.S. Department of Housing and Urban Development (HUD) programs that have established specific radon guidance. This Notice does not impose radon testing requirements; however, it does include guidance on strategies for considering radon in the site contamination analysis.

This notice applies *only* to projects that are subject to HUD's contamination regulations at 24 CFR 50.3(i) or 24 CFR 58.5(i). It does not apply to the purchase of single family homes with an FHA-backed mortgage nor Section 184 and Section 184A loan guarantees. This notice also does *not* preempt any existing, federal state, or local requirements regarding radon. It also does not preempt the radon requirements found in HUD's Office of Housing programs following the Multifamily Accelerated Processing (MAP) Guide, Healthcare Mortgage Insurance Program Handbook, Rental Assistance Demonstration Program Notice and supplemental guidance, or other current or future radon guidance that is more prescriptive. See section IV of this notice for links to Housing radon guidance documents.

Compliance with this notice is required 90 days after the date issued for all HUD programs subject to 24 CFR Parts 50 and 58, with the exception of Tribe, Tribally Designated Housing Entity (TDHE), and Department of Hawaiian Homeland (DHHL) recipients. In

recognition of the need to provide additional support for radon programs, compliance with this notice is required starting January 11, 2026 for Tribe, TDHE, and DHHL recipients.

#### II. Radon and its health effects

Radon is a radioactive gas that forms when radium and certain other radioactive metals break down in rocks, soil, and water.<sup>1</sup> It is found in nearly all soils and moves through the soil to the air and into structures through cracks and other areas of permeability. Building materials and groundwater may also be a source of indoor radon. Once inside, radon concentrations can build to high levels, regardless of the age, condition, or design of the building.

The most common pathway for human exposure to radon is inhalation indoors. Radon is the number one cause of lung cancer in non-smokers and the second leading cause of lung cancer overall.<sup>2</sup> The risk of adverse health effects from radon in indoor air depends largely on two main variables: the level of radon exposure and the length of time exposed. Many radon-induced lung cancers can be prevented by testing and reducing radon levels in existing buildings and by using radon resistant construction techniques for all new construction.<sup>3</sup>

The goal for mitigating radon in buildings is to reduce radon concentrations in indoor air as low as reasonably achievable and practicable considering the efficacy of current industry-standard radon reduction systems and environmental conditions (e.g., geology and climate). The most effective strategy to protect the health and safety of occupants is to prevent radon from entering the building by using radon resistant construction techniques; another effective strategy is to reduce the level of radon inside existing buildings by installing and operating a radon reduction system. An effective radon reduction system achieves two main goals: it reduces the concentration of radon gas in the home by venting it safely outside the structure and removes the radon gas from under the foundation before it can come into the home.

# III. Considering radon in the environmental review

HUD's environmental regulations at 24 CFR 58.5(i)(2)(i) and (ii)<sup>4</sup> state that,

[i]t is HUD's policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended utilization of the property.

The environmental review of multifamily housing . . . , must include the evaluation of . . . other evidence of contamination on or near the site, to ensure that occupants of proposed sites are not

<sup>&</sup>lt;sup>1</sup> National Institute of Health, Periodic Table, Element Summary, "Radon", https://pubchem.ncbi.nlm.nih.gov/element/Radon.

<sup>&</sup>lt;sup>2</sup> U.S. Environmental Protection Agency, "Health Risk of Radon", <a href="https://www.epa.gov/radon/health-risk-radon">https://www.epa.gov/radon/health-risk-radon</a>.

<sup>&</sup>lt;sup>3</sup> https://www.epa.gov/radon/health-risk-radon.

<sup>&</sup>lt;sup>4</sup> HUD's contamination policy at 24 CFR 50.3(i)(1) and (2) implements the same substantive policy with slightly different text, <a href="https://www.ecfr.gov/current/title-24/subtitle-A/part-50/subpart-A/section-50.3">https://www.ecfr.gov/current/title-24/subtitle-A/part-50/subpart-A/section-50.3</a>.

adversely affected by any of the hazards listed in paragraph (i)(2)(i) of this section.

As radon is a radioactive substance, HUD or the responsible entity (RE) must consider it as part of the site contamination analysis for projects that:

- Require an environmental review at the level of *Categorically Excluded Subject to 50.4* or 58.5 ("CEST"), *Environmental Assessment*, or *Environmental Impact Statement*; and
- Involve structures that are occupied or are intended to be occupied at least four (4) hours a day.

Note: HUD's contamination policy does not apply to projects that are Exempt or Categorically Excluded Not Subject to 50.4 or 58.5 ("CENST").

HUD encourages environmental review preparers to follow the most recent U.S. Environmental Protection Agency (EPA) recommendations about assessing the health risk from radon exposure and when to reduce radon levels in indoor air. Because more people are exposed to moderate levels of radon, most radon-induced lung cancer results from long-term exposure to low or moderate radon levels in the home, as opposed to short term exposure to very high levels of radon. The EPA recommends homes be fixed if the radon level is 4 pCi/L or more. Because there is no known safe level of exposure to radon, EPA also recommends that Americans consider fixing their home for radon levels between 2 pCi/L and 4 pCi/L<sup>6</sup>. Indoor air radon levels vary across the U.S. and from parcel to parcel due to differences in geology, climate, seasonal variation, building construction, and other conditions. Additionally, because radon cannot be seen, tasted, or smelled, the only method for determining the precise radon level in a specific building is to test the indoor air.

# Exemptions from having to consider radon in the contamination analysis<sup>7</sup>:

- Buildings with no enclosed areas having ground contact.
  - o Buildings containing crawlspaces, utility tunnels, or parking garages would *not* be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems document radon levels are below 4 pCi/L<sup>8</sup> with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within

<sup>&</sup>lt;sup>5</sup> World Health Organization, *Handbook on Indoor Radon; A Public Health Perspective* (January 1, 2009). p. x, 2, <a href="https://www.who.int/publications/i/item/9789241547673">https://www.who.int/publications/i/item/9789241547673</a>.

<sup>&</sup>lt;sup>6</sup> https://www.epa.gov/radon/what-epas-action-level-radon-and-what-does-it-mean

<sup>&</sup>lt;sup>7</sup> These exemptions are specific to this notice and do not all comport with the requirements in the MAP Guide, Healthcare Mortgage Insurance Program Handbook, RAD Program Notice and supplemental guidance or other program guidance.

<sup>&</sup>lt;sup>8</sup> Or the EPA's current recommended level for reducing radon levels in indoor air, https://www.epa.gov/radon/health-risk-radon.

- two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

#### A. How to consider radon in the HUD Environmental Review

This section details how environmental review preparers may consider radon in the HUD environmental review in order to satisfy 24 CFR 50.3(i) or 24 CFR 58.5(i) <sup>10</sup>. This section provides a recommended "best practice" method; however, preparers may utilize one of the alternate options if they choose not to implement the best practice.

# i. Recommended Best Practice

When considering radon in the contamination analysis, HUD strongly recommends using the American National Standards Institute/American Association of Radon Scientists and Technologists (ANSI/AARST) radon testing standards for single- and multi- family buildings, schools, and large buildings, including those constructed using radon-resistant construction techniques. The ANSI/AARST standard describes how to conduct testing, interpret test results, and draft a Radon Test Report to document the process for the building owner (and to use as documentation for the ERR).

The ANSI/AARST standards can be viewed online for free and are intended to be implemented by licensed radon professionals. To find a licensed radon professional in your area contact the State/Tribe's radon program office, <sup>12</sup> National Radon Proficiency Program (NRPP), <sup>13</sup> or the National Radon Safety Board (NRSB). <sup>14</sup>

There may also be state and/or local radon requirements, depending on the jurisdiction. Contact the relevant State/Tribal radon control program to ensure the project complies with State/Tribal requirements.<sup>15</sup>

Note: Although testing is not required under this notice, *testing is the only way to determine the radon level within a building*.

<sup>&</sup>lt;sup>9</sup> Note that the allowance for the use of test results within the previous five years is specific to this notice and does *not* comport with the ANSI/AARST standards.

<sup>&</sup>lt;sup>10</sup> This section does not apply to projects that are subject to the MAP Guide, Healthcare Mortgage Insurance Program Handbook or RAD Program Notice and supplemental guidance or other current or future HUD radon guidance that is more prescriptive.

<sup>&</sup>lt;sup>11</sup> ANSI/AARST Standards (In lieu of developing a federal radon testing standard, the EPA references the ANSI/AARST Standards), <a href="https://standards.aarst.org/">https://standards.aarst.org/</a> (<a href="https://standards.aarst.org/">https://standards.aarst.org/</a> (<a href="https://www.epa.gov/radon/radon-standards-practice">https://standards.aarst.org/</a> (<a href="https://www.epa.gov/radon/radon-standards-practice">https://standards.aarst.org/</a> (<a href="https://www.epa.gov/radon/radon-standards-practice">https://standards.aarst.org/</a> (<a href="https://www.epa.gov/radon/radon-standards-practice">https://standards.aarst.org/</a> (<a href="https://www.epa.gov/radon/radon-standards-practice">https://standards-practice</a>).

<sup>&</sup>lt;sup>12</sup> The National Radon Program Services, "State Radon Programs Information", https://sosradon.org/state.

<sup>&</sup>lt;sup>13</sup> NRPP, <a href="https://nrpp.info">https://nrpp.info</a>.

<sup>&</sup>lt;sup>14</sup> NRSB, https://www.nrsb.org.

<sup>15</sup> https://sosradon.org/state.

# ii. Alternative Options

Using the ANSI/AARST radon testing standards is not the only option available for considering the risk that occupants may be exposed to high radon levels. <sup>16</sup> If the environmental review preparer chooses not to conduct radon testing per the ANSI/AARST standards, one of the following alternative strategies <sup>17</sup> must be used to consider radon in the contamination analysis. Review the HUD program office guidance in Section IV to ensure the strategy used to consider radon in the contamination analysis complies with specific program office requirements for the project. <sup>18</sup>

1. Do-it-yourself (DIY) radon test kits may be used to measure radon levels in single-family dwelling units. In HUD single-family buildings<sup>19</sup> with multiple units, one DIY test kit must be used for each dwelling unit. DIY radon test kits may be available for low or no cost through State/Tribal radon program offices and are available to purchase through the National Radon Program Services website and some state radon control program websites.<sup>20</sup>

When using a DIY test kit, there can be quality control issues that affect the quality of the test results. To ensure the DIY test results are as accurate as possible, it is important to read the entire test kit instructions before activating the test device and to follow them fully. The EPA's *Citizen's Guide to Radon*<sup>21</sup> and the ANSI/AARST standard for testing single-family housing are excellent resources for detailed instructions about conducting the radon test, including where to place the test device(s), how to prepare the home (whether to close the windows, turn off fans, the length of time to test), how to document the test process, and interpret the results. HUD encourages that test devices be approved by either the NRPP or NRSB. Contact the National Radon Program Services helpline, the State/Tribal radon program office, or the local health department for assistance.<sup>22</sup>

2. In remote or other areas where there are no licensed/certified radon professionals and/or DIY test kits cannot be shipped to a lab in sufficient time, the local government, such as a local health department or environmental department, may decide to purchase radon monitoring equipment and train staff to use it. Monitoring equipment, such as continuous radon monitors, should be used in accordance with the manufacturer's instructions and intended use and staff should ensure proper quality control and quality assurance practices are adhered to.

<sup>&</sup>lt;sup>16</sup> High levels of radon are those that are at or above 4 pCi/L.

<sup>&</sup>lt;sup>17</sup> Alternative to measuring radon levels in indoor air using the ANSI/AARST standards.

<sup>&</sup>lt;sup>18</sup> Note: REs and HUD must also ensure that the strategy used complies with any state or local laws and regulations regarding radon.

<sup>&</sup>lt;sup>19</sup> HUD defines "single family building" as a residential building with one to four dwelling units.

<sup>&</sup>lt;sup>20</sup> National Radon Program Services, https://sosradon.org/purchase-kits.

<sup>&</sup>lt;sup>21</sup> EPA, A Citizen's Guide to Radon: The Guide to Protecting Yourself and Your Family from Radon (EPA 402/K-12/002, December 2016), <a href="https://www.epa.gov/radon/publications-about-radon">https://www.epa.gov/radon/publications-about-radon</a>.

<sup>&</sup>lt;sup>22</sup> The National Radon Program Services, which has phone, email, and mail connections, is operated by Kansas State University for the US EPA, <a href="https://sosradon.org/Contact">https://sosradon.org/Contact</a>. (The phone numbers may also be reached by persons with hearing or speech difficulties by dialing 711 via teletype (TTY) or telecommunications device for the deaf (TDD)).

- 3. Scientific data review. Available science-based information may be used to determine whether the project site is located in an area that has average documented radon levels at or above 4 pCi/L. Contact the State/Tribal radon program office (or health department), as needed, for assistance with obtaining and interpreting available science-based information about radon levels in the area. Science-based information includes, but is not limited to:
- State/Tribe-generated radon information, such as surveys of radon levels from collecting radon measurement data or geological studies that identify high risk areas.
- Department of Health and Human Services, Centers for Disease Control and Prevention (CDC), National Environmental Public Health Tracking, Radon Testing map.<sup>23</sup> This map provides radon test data from national radon testing laboratories and states that can be viewed by state or county. Radon test data ranges from 1988 to the present.

Environmental review preparers may *not* use the EPA Map of Radon Zones nor EPA State Maps of Radon Zones for considering radon levels at a project site for compliance with 24 CFR 50.3(i) or 24 CFR 58.5(i) because it is not appropriate for a site-specific analysis of radon risk, which is required for a HUD environmental review.

Note: Although science-based, a document review *does not* determine the radon level in a specific building; where feasible, HUD recommends using one of the radon testing strategies.

When conducting a scientific data review in lieu of testing, there must be a minimum of 10 (ten) documented test results over the previous 10 years for which data is available in a given county for the scientific data review approach to be utilized. If there are less than 10 documented results over this period, then there is a lack of scientific data for the purposes of this notice and no further consideration of radon is needed if testing is infeasible or impracticable.

Additionally, testing data utilized should cover the smallest geographic area for which the minimum amount of documented test results exist, up in size to the county in which the project is located. The best available data must be used. Best available data refers to the most current data that best indicates the level of radon concentration at a project site. Whenever possible, utilize the average of the previous 10 years of data.

There may be certain scenarios in which use of the Recommended Best Practice or Alternative Options identified above may not be feasible or practicable due to limited access to testing (e.g., lack of licensed radon professionals in the project area) and lack of scientific data (e.g., there are less than 10 documented test results over the previous 10 years). Refer to section **C. Documenting the environmental review record** below for documentation requirements in these scenarios.

6

<sup>&</sup>lt;sup>23</sup> CDC, "National Environmental Public Health Tracking, Radon Testing", <a href="https://www.cdc.gov/nceh/tracking/topics/RadonTesting.htm">https://www.cdc.gov/nceh/tracking/topics/RadonTesting.htm</a>.

#### B. Mitigating Radon

When radon testing determines indoor air radon levels are at or above 4 pCi/L or the scientific data review determines the project site is located in an area that has documented radon levels at or above 4 pCi/L, the Environmental Review Record (ERR) must include a mitigation plan. When the determination is based on a scientific data review, if feasible, HUD recommends conducting radon testing (using one of the testing strategies described in the previous sections) to confirm radon levels in the building(s) proposed for HUD funding. If testing then demonstrates that radon levels within the building are below 4 pCi/L, mitigation would *not* be required; environmental review preparers can simply document the test results in the ERR.

The mitigation plan<sup>24</sup> must identify the radon level; consider the risk to occupants' health; describe the radon reduction system that will be installed; whenever possible, establish an ongoing maintenance plan to ensure the system is operating as intended; establish a reasonable timeframe for implementation (i.e., integrate radon mitigation activities into an annual plan or a 5-year plan that is already completed for HUD funded activities); and require post-installation testing. Where feasible, post-installation testing should be conducted by a licensed radon professional. In an area where there are no licensed radon professionals, there may be other personnel, such as trained staff, other professionals (i.e., engineers, geologist, scientists, public health staff) who have experience conducting radon testing or have the relevant skills and knowledge to follow the device instructions or ANSI/AARST test protocols and mitigation standards. For assistance Contact the EPA's local radon program office, state/Tribe radon program office, the National Radon Program Services, or refer to the applicable ANSI/AARST standard for guidance.

If using the ANSI/AARST mitigation standard to install the radon reduction system, follow the guidance in the standard to draft the mitigation and the operation, maintenance, and monitoring plans.

# C. Documenting the environmental review record

Under HUD's regulations, 24 CFR 58.38(a)(3) or 50.11, HUD, or the RE, is required to document the radon evaluation as part of the contamination analysis in the ERR. For ERRs documented using the HUD Environmental Review Online System (HEROS), document the radon evaluation in the Contamination and Toxic Substances factor Compliance Determination screen and upload supporting documentation. For Office of Housing projects, document the radon evaluation in the HEROS Housing Requirements Screen.

If testing is not conducted and not otherwise required by program guidance, the documentation will need to provide evidence of average documented radon test results covering the project site or its county, other science-based information suggesting radon levels at the project site, or evidence of a lack thereof.

<sup>25</sup> EPA Regional, State, and Tribal Radon contacts, <a href="https://www.epa.gov/radon/epa-map-radon-zones-and-supplemental-information#datainfo">https://www.epa.gov/radon/epa-map-radon-zones-and-supplemental-information#datainfo</a>; National Radon Program Services, <a href="https://sosradon.org/main">https://sosradon.org/main</a> or 800 644-6999.

<sup>&</sup>lt;sup>24</sup> Example of an areawide radon testing plan: Home Forward, Multnomah County, Oregon at: <a href="http://homeforward.org/content/radon-information">http://homeforward.org/content/radon-information</a>.

In instances where radon testing will be conducted but cannot be conducted until after the environmental review record is certified -such as with new construction or certain rehabilitation projects- then the initial documentation would not include a radon evaluation but must include a condition for post-construction radon testing followed by mitigation if needed. The environmental preparer must update the environmental review record with the radon evaluation and proof of any required mitigation when complete.

Acceptable methods to document radon consideration in the ERR include:

- ANSI/AARST standard: Include a copy of the test report and mitigation plan (if applicable) as described in the standard in the ERR. For Office of Housing programs, follow program guidance requirements on timing and documentation.
- DIY and other radon test strategies: Document the test device, time period of test, test conditions (HVAC system off windows closed, outside temperature), test results, and other conditions relevant to test conditions. Refer to the applicable ANSI/AARST standard as guidance.
- Review of CDC radon testing data, geologic studies/maps, other scientific data: Describe and cite the maps and data used to determine the area wide radon levels and include copies of all supporting documentation (maps/studies) in the ERR.
- In instances where HUD grantees, applicants, and recipients are unable to obtain science-based data, environmental review preparers must consider the feasibility of radon testing if they have not already. If the grantee, applicant, or recipient determines that testing is infeasible or impracticable, the environmental review must document the basis for this determination. Acceptable documentation in these scenarios where testing is infeasible and science-based data is not available includes but is not limited to: correspondence with state and local radon control agencies indicating a lack of scientific data evidencing radon levels at the project site, a copy of CDC Environmental Health Tracking Network information showing the project site is located in a county with a lack of scientific data, and a basis for the conclusion that testing would be infeasible or impracticable. The RE, grantee, applicant, or recipient is not required to submit additional documentation substantiating their decision that testing is infeasible or impracticable.
- When all this is documented in the ERR, *no* further consideration of radon is needed and no further action with respect to radon is needed for the environmental review.

Examples of acceptable documentation of radon consideration in the ERR:

A project site is located in a county in which the CDC Radon Testing data shows that
more than 10 tests have been conducted over the last 10 years. The average of the 200
tests completed in the county over the last 10 years is 4.5 pCi/L. Since scientific data

<sup>&</sup>lt;sup>26</sup> Common instances where this determination may occur include a lack of funding for testing or the cost of testing is prohibitively high when compared with the cost of a particular low-dollar project.

indicates that average radon levels in the county in which the project is located are greater than 4.0 pCi/L, the grantee must either test for radon or formulate a mitigation plan they will implement.

- Radon testing data from the CDC Environmental Public Health Tracking Network map shows data for the county in which the project site is located, which is the smallest area for which data is available. The data shows the annual mean pre-mitigation radon measurement in tested buildings for the most recent 10-year period as 1.8 pCi/L. There is no other available evidence of radon levels in the area. The local government chooses to establish a radon testing plan to confirm radon levels in specific buildings are below 4 pCi/L. The test plan timeframe aligns with the RE's housing rehabilitation plan.
- A project site is located in a county in which the CDC Radon data shows that more than 10 tests have been conducted over the last 10 years. The average of the 220 tests completed in the county over the last 10 years in 3.2 pCi/L. The responsible entity or HUD reviewer documents the results in the environmental review records and therefore satisfies this notice's requirement that radon be considered as part of the environmental review process.
- A project site is located in a county in which the CDC data shows that fewer than 10 tests have been conducted over the last 10 years. The RE or HUD reviewer documents the lack of scientific data in the environmental review records. The RE has reviewed the cost of radon testing for the project and determined that testing is infeasible because the cost to test for this project would cut too much into the project's small budget. They note this determination in the environmental review record.

The local EPA radon contact person and the National Radon Program Services may be able to assist with developing a testing plan. The EPA's *A Citizen's Guide to Radon* (for single family homes) and the ANSI/AARST standards (single family and multifamily buildings) are a good source for guidance on the information that is included in a test plan.

Note: HUD or a Responsible Entity must reject projects in areas that have sufficient documented radon levels at or above 4 pCi/L if no mitigation has been proposed or performed.

# IV. HUD program office documents addressing radon

Current HUD program office guidance regarding radon testing and mitigation is listed below. Each HUD program office is responsible for issuing program-specific radon guidance. Program guidance may be updated as Departmental policies develop; be sure to use the most current guidance. Additionally, this notice does not preempt or modify existing HUD program-specific radon requirements, such as those found in the Multifamily Accelerated Processing (MAP) Guide, the Healthcare Mortgage Insurance Program Handbook 4232.1 Rev-1, the RAD Program Notice and Supplemental Notice 4B, or other current or future radon guidance that is more prescriptive. For questions concerning program office guidance, contact your program office representative.

- Office of Housing, Multifamily Housing, Multifamily Accelerated Processing Guide (4430.G), Section 9.6.3,
  - https://www.hud.gov/program\_offices/administration/hudclips/guidebooks/hsg-gb4430
- Office of Housing, Office of Residential Care Facilities, *Healthcare Mortgage Insurance* Program Handbook (4232.1), Section 7.8, Rev-1), or most recent edition, https://www.hud.gov/sites/documents/42321S2C7HSGH.PDF
- Office of Housing, Office of Recapitalization, Rental Assistance Demonstration (RAD) Program (Notice H-2019-09 PIH-2019-23 (HA)) and Supplemental Notice 4B (Notice H-2023-08 PIH-2023-19 (HA)), https://www.hud.gov/RAD/library/notices
  - o Quick Reference Guide, Environmental Review Requirements for RAD Conversions (2020), https://www.hudexchange.info/resource/4216/environmental-reviewrequirements-for-rad-transactions/. Check RAD Resource Desk for future guidance, https://www.radresource.net/index.cfm
- Office of Public and Indian Housing (PIH), Radon Information for PIH Programs (Notice 2013-06 (HA)), https://www.hud.gov/sites/documents/PIH2013-06.PDF and https://www.hudexchange.info/programs/radon/

#### V. **Resources**

#### **HUD** resources for implementation of this notice Α.

Costs for radon testing and mitigation are considered eligible program costs for many HUD grant programs. As such, costs for radon testing and mitigation could be included in the total project costs funded or insured by HUD. Note: Costs for ongoing operation and/or maintenance of installed mitigation systems may not be eligible under certain HUD programs. For questions about the eligibility of the ongoing maintenance of radon mitigation systems, as well as other funding-specific questions, contact your HUD program office contact.

Table A on the following page, notes the major HUD programs for which radon testing and/or mitigation under 24 CFR 50.3(i) or 24 CFR 58.5(i) is an eligible program expense. This list is non-exhaustive; for other HUD programs please contact the appropriate program office contact.

Table A: HUD programs and radon testing and mitigation as an eligible expense

Program or grant name	Is radon testing an eligible expense?	Is radon mitigation an eligible expense? <sup>27</sup>
Community Development Block Grant (CDBG)	Yes	Yes
Community Development Block Grant CARES Act (CDBG-CV)	Yes	Yes
Community Development Block Grant Disaster Recovery (CDBG-DR)	Yes	Yes
Community Development Block Grant Mitigation (CDBG-MIT)	Yes	Yes
Community Project Funding (CPF) Grants	Yes	Yes
Continuum of Care Program (CoC)	Yes	Yes
Emergency Solutions Grants Program	Yes	Yes
FHA-Insured Healthcare Loans	Yes	Yes
FHA-Insured Multifamily Loans	Yes	Yes
Green and Resilient Retrofit Program (GRRP)	Yes	Yes
HOME Investment Partnerships American Rescue Plan Program (HOME-ARP)	Yes	Yes
HOME Investment Partnerships Program (HOME)	Yes	Yes
Housing Opportunities for Persons With AIDS (HOPWA)	Yes	Yes
Housing Trust Fund (HTF)	Yes	Yes
HUD Section 8 renewals with capital repairs	Yes	Yes
HUD Section 8(bb) Transfer of Budget Authority.	Yes	Yes
Indian Community Development Block Grant (ICDBG)	Yes	Yes
Indian Housing Block Grant Program (IHBG)	Yes	Yes
Public Housing Capital and Operating Funds	Yes	Yes
Rental Assistance Demonstration (RAD)	Yes	Yes
Section 108 Loan Guarantee Program	Yes	Yes
Section 202 Supportive Housing for the Elderly Program	Yes	Yes
Section 811 Supportive Housing for Persons with Disabilities Program	Yes	Yes
Self-Help Homeownership Opportunity Program (SHOP)	Yes	Yes
Transfers of Rental Assistance with HUD Held or Insured Debt and/or Use Restrictions ("Section 209 Transfers.")	Yes	Yes

<sup>27</sup> Note: The term "radon mitigation" refers only to initial installation of a radon mitigation system and does *not* encompass ongoing maintenance.

#### B. Other radon resources

- EPA radon website, <a href="https://www.epa.gov/radon">https://www.epa.gov/radon</a>National Radon Program Services, <a href="https://sosradon.org/">https://sosradon.org/</a>
  - o Helpline: 1-800-557-2366
  - o Comprehensive radon information, links to state radon programs and radon testing and mitigation information, and access to radon helplines
- CDC, National Center for Environmental Health, "Radon", <a href="https://www.cdc.gov/radon/">https://www.cdc.gov/radon/</a>
  - o National Environmental Public Health Tracking Network testing data map: <a href="https://www.cdc.gov/nceh/tracking/topics/RadonTesting.htm">https://www.cdc.gov/nceh/tracking/topics/RadonTesting.htm</a>
- ANSI/AARST radon testing protocols and mitigation standards, https://standards.aarst.org/
- HUD 3-part radon webinar series sponsored by the Office of Lead Hazard Control and Healthy Homes and Public and Indian Housing, https://www.hudexchange.info/programs/radon/
- Office of Lead Hazard Control and Healthy Homes, *About Radon*, https://www.hud.gov/program\_offices/healthy\_homes/healthyhomes/radon
- OEE, *Radon Fact Sheet*, <a href="https://www.hudexchange.info/resource/4955/oee-radon-fact-sheet/">https://www.hudexchange.info/resource/4955/oee-radon-fact-sheet/</a>
- OEE Radon and HUD-Assisted Projects Webinar Series, https://www.hudexchange.info/news/radon-and-hud-assisted-projects-webinar-series/

For questions concerning this Notice, contact your local OEE field environmental office staff, <a href="https://www.hudexchange.info/programs/environmental-review/hud-environmental-staff-contacts/">https://www.hudexchange.info/programs/environmental-review/hud-environmental-staff-contacts/</a>