



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

**Information Collection Request  
Public Consultations**

**AUG - 5 2014**

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Dear Potential Respondent:

The U.S. Environmental Protection Agency (EPA) is seeking your comments on the regulation set forth in 40 CFR 745, Subpart F and 24 CFR 35, Subpart H titled "Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards Upon Sale or Lease of Residential Property."

The regulation requires sellers, lessors and their agents to: (1) disclose all known lead-based paint (LBP) and LBP hazards to potential buyers and lessees before the selling or leasing of target (pre-1978) housing; (2) disclose any and all LBP and LBP hazard information such as LBP inspection reports, risk assessments, elevated blood lead level reports and other data; (3) provide purchasers and lessees with a federally-approved lead hazard information pamphlet such as "Protect Your Family From Lead in Your Home"; (4) provide purchasers with a 10-day opportunity to conduct a risk assessment or inspection for the presence of lead-based paint and/or lead-based paint hazards before the purchaser is obligated under any purchase contract; and (5) retain and maintain records of these disclosure activities for a minimum of 3 years. Further, the records must include the signed and dated disclosure forms and a list of available records and reports.

Because the regulation involves the collection of information from a large number of individuals, EPA is required to submit an Information Collection Request (ICR) to the Office of Management and Budget (OMB) for approval, and to renew the ICR every three years. EPA is currently in the process of renewing the ICR for the above-described regulation. A draft copy of the ICR renewal is attached, and is also published in the Federal Register (<http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPPT-2013-0811-0001>)

The requirements under this regulation directly impact the members of your organization. As such, EPA requests that you complete the attached questionnaire as thoroughly as possible to represent your organization's viewpoint on what can be done to change or improve the process. The information you provide will have an impact on government efficiency. Please provide your answers to EPA by September 22, 2014 via email at [wilkins.john@epa.gov](mailto:wilkins.john@epa.gov). Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle Price".

Michelle Price, Chief  
Lead, Heavy Metals and Inorganics Branch

## Lead-Based Paint Disclosure Regulation ICR Renewal Questionnaire

### Time and Cost Burden

1. How much time does it take for you or your staff to distribute the lead hazard information pamphlet, and give the Lead-Based Paint and Lead-Based Paint Hazard reports to potential buyers and potential lessees?
  
2. Do you encounter a financial burden in acquiring, or printing/photocopying, or maintaining an inventory of lead hazard information pamphlets and copies of reports related to Lead-Based Paint and Lead-Based Paint Hazards?
  - a. If so, what is the financial burden to you?
  
3. Do you understand that you are required to maintain in your records for 3 years, copies of the acknowledgment forms/receipts, and lead related certifications that the buyers or lessees are required to receive?
  
4. How much time does it take for you or your staff to document and file acknowledgment forms/receipts, and lead related certifications?
  
5. Do you encounter a financial burden maintaining these acknowledgment forms/receipts, and lead related certifications, and copies of reports related of Lead-Based Paint and Lead-Based Paint Hazards?
  - a. If so, what is the financial burden to you?
  
6. How much time did it take you and your staff to understand your responsibilities and the actions which must occur before any sale or lease of target housing?

7. Do you have any other suggestions or comments on how to proceed with the disclosure of the information required above?

8. Do you have any comments on the updated burden analysis contained in the draft ICR Renewal?

*Electronic Reporting and Recordkeeping:*

9. Are you interested in using, or are you currently utilizing, electronic reporting/recordkeeping options?

10. Do you have any other suggestions or comments on the reporting and recordkeeping requirements?

*In General*

11. Do you have any other comments or suggestions about the regulation in general?

From: Gail Phillips <gphillips@narpm.org>  
Sent: Monday, September 08, 2014 10:29 AM  
To: Wilkins, John  
Cc: Gordon Dixon  
Subject: Lead Based Paint Survey  
Attachments: EPA Survey.pdf

Attached is a survey that National Association of Residential Property Managers (NARPM®) sent to members of the Association to receive input on your request for Information on the "Disclosure of Known Lead Based Paint and/or Lead Based Paint Hazards Upon Sale or Lease of Residential Property."

Members of NARPM® are residential property managers who manage properties for other people (their clients). We hope that the feedback gathered in this survey assists with the information the EPA is their collection of information.

Please let us know if NARPM® can be of any assistance in the future.

Gail S. Phillips, CAE  
EXECUTIVE DIRECTOR | gphillips@narpm.org  
National Association of Residential Property Managers  
638 Independence Parkway, Suite 100, Chesapeake, VA 23320 | P 800-782-3452 | F 866-466-2776 |  
www.narpm.org

Please consider the environment before printing this e-mail.

**Q1 How much time does it take you, or your staff, to distribute the lead hazard information pamphlet and give the Lead-Based Paint and Lead-Based Paint Hazard reports to potential lessees?**

Answered: 154 Skipped: 4

#	Responses	Date
1	about a minute	9/5/2014 10:34 AM
2	5 minutes per	9/5/2014 10:32 AM
3	5 minutes	9/5/2014 10:31 AM
4	Very little, it's part of lease-signing paperwork.	9/5/2014 10:23 AM
5	How much time it takes is not the point. The point is that we are forced to distribute this document. ALL of our leases state presence of lead based paint = unknown.	9/5/2014 10:19 AM
6	Too much	9/5/2014 10:17 AM
7	15 Minutes per applicable lease executed	9/5/2014 10:15 AM
8	We include this with our entire leasing package it takes a few minutes to attach it to the email we send to our tenants	8/29/2014 10:24 AM
9	minutes	8/27/2014 1:31 PM
10	15 minutes	8/26/2014 5:32 PM
11	About 5 minutes per lease.	8/25/2014 9:01 PM
12	Approximately 45 minutes to an hour.	8/25/2014 6:06 PM
13	It's just part of the leasing process. Doesn't really take extra time	8/24/2014 10:19 PM
14	A minute and then 5 minutes to explain why	8/24/2014 9:41 AM
15	For all the steps of the process? Getting the forms printed, distributed, signed, tracking, filing,... 15 minutes +/-	8/22/2014 6:43 PM
16	physical printing of the pamphlet takes the longest. 5 minutes.	8/22/2014 4:39 PM
17	5 minutes	8/22/2014 1:50 PM
18	5 minutes	8/22/2014 11:17 AM
19	2 minutes	8/21/2014 6:10 PM
20	The info pamphlet -we email - so maybe 5 mins	8/21/2014 6:01 PM
21	15 minutes or less	8/21/2014 1:56 PM
22	Very little	8/21/2014 12:50 PM
23	click of a button on e-mail	8/21/2014 12:07 PM
24	5 minutes	8/21/2014 8:27 AM
25	Very little,it is a part of our standard lease package and the booklet is emailed out to the tenants.	8/21/2014 12:51 AM
26	Very little	8/20/2014 4:12 PM
27	10 minutes - this includes printing, putting together, and going over it - we manage about 600 properties	8/20/2014 4:03 PM
28	5 min	8/20/2014 3:56 PM

29	1 min	8/20/2014 12:34 PM
30	Approximately 1-2 minutes	8/20/2014 11:55 AM
31	Not a lot. We have never had any owner that has ever admitted to having any reports, so we are only distributing the pamphlets and the disclosure forms.	8/20/2014 10:46 AM
32	Done electronically so it does not take much time.	8/20/2014 10:42 AM
33	too much	8/20/2014 10:12 AM
34	one min	8/20/2014 8:05 AM
35	5-10 minutes	8/20/2014 6:54 AM
36	a few minutes	8/19/2014 11:34 PM
37	1 hour (employeee hourly wage) per lease	8/19/2014 11:18 PM
38	5 minutes per lease or lease renewal.	8/19/2014 10:54 PM
39	Every new tenant gets a pamphlet provided by our hone warranty company	8/19/2014 10:46 PM
40	10 minutes	8/19/2014 10:40 PM
41	15 minutes	8/19/2014 10:02 PM
42	5 min	8/19/2014 9:52 PM
43	once we have the documents from the owner, it takes about 5 extra minutes at the lease signing	8/19/2014 9:18 PM
44	15 minutes	8/19/2014 9:14 PM
45	1 hour	8/19/2014 8:38 PM
46	5 minutes	8/19/2014 8:36 PM
47	10 minutes	8/19/2014 8:21 PM
48	10 minutes	8/19/2014 7:27 PM
49	5 mins	8/19/2014 7:17 PM
50	5 min	8/19/2014 6:52 PM
51	5 - 510 minutes by the time I explain	8/19/2014 6:45 PM
52	5 minutes, tops.	8/19/2014 6:36 PM
53	Not sure	8/19/2014 6:35 PM
54	1-2 days	8/19/2014 6:33 PM
55	1-2 days	8/19/2014 6:33 PM
56	2 minutes	8/19/2014 6:18 PM
57	.25 hours	8/19/2014 6:18 PM
58	5 minutes	8/19/2014 6:18 PM
59	It is a part of our process, not long.	8/19/2014 6:09 PM
60	Per house? Per year? Because the EPA has been so aggressive in their enforcement, we spend a lot of time making sure EVERY tenant signs the addendum and gets a copy of the pamphlet.	8/19/2014 5:58 PM
61	5 minutes	8/19/2014 5:48 PM
62	5 minutes	8/19/2014 5:46 PM
63	if I can email the panphlet and email the form, then probably an hour. if it needs to be in person then several days.	8/19/2014 5:38 PM
64	No idea. But far too much such that we never actually do it.	8/19/2014 5:31 PM
65	5 minutes	8/19/2014 5:17 PM

66	3 minutes	8/19/2014 5:13 PM
67	5 mins. per lease	8/19/2014 4:51 PM
68	15 minutes per lease	8/19/2014 4:36 PM
69	2 minutes a transaction	8/19/2014 4:35 PM
70	just minutes as it is included with all lease and on Zip Forms	8/19/2014 4:26 PM
71	3hrs/month	8/19/2014 4:14 PM
72	15 - 20 minutes	8/19/2014 4:03 PM
73	Its part of the lease signing so as long as it takes for them to initial and sign.	8/19/2014 3:59 PM
74	30 SECONDS	8/19/2014 3:55 PM
75	3 minutes	8/19/2014 3:51 PM
76	15 min	8/19/2014 3:42 PM
77	A lot!	8/19/2014 3:41 PM
78	10 extra minutes	8/19/2014 3:40 PM
79	We spend hours and mass amounts of paper printing, folding, and distributing these pamphlets. We have learned to pre-print the booklets and to enclose them in our leasing packets to cut down on time. However, we still spend hours printing and preparing them to include them in our packets.	8/19/2014 3:38 PM
80	About 10 min total per lease	8/19/2014 3:31 PM
81	5 minutes per lease to explain information and sign papers. - probably 1 hour per month.	8/19/2014 3:29 PM
82	10 minutes. Not much time at all. Standard procedure for all units.	8/19/2014 3:27 PM
83	10 min	8/19/2014 3:20 PM
84	5 minutes	8/19/2014 3:19 PM
85	10 minutes	8/19/2014 3:18 PM
86	5 minutes wasted per lease.	8/19/2014 3:15 PM
87	10 min.	8/19/2014 3:09 PM
88	1 hour	8/19/2014 3:05 PM
89	At least 15 minutes per applicant.	8/19/2014 3:02 PM
90	a few minutes	8/19/2014 3:02 PM
91	5mins	8/19/2014 2:58 PM
92	less than 5 minutes	8/19/2014 2:56 PM
93	5 minutes	8/19/2014 2:51 PM
94	Not much	8/19/2014 2:50 PM
95	TOO MUCH TIME!	8/19/2014 2:48 PM
96	We hand them out when tenants move in	8/19/2014 2:44 PM
97	3 minutes	8/19/2014 2:40 PM
98	15 mins	8/19/2014 2:38 PM
99	less than 5 minutes	8/19/2014 2:38 PM
100	30 seconds	8/19/2014 2:37 PM
101	10 minutes	8/19/2014 2:36 PM
102	15 minutes per lease	8/19/2014 2:34 PM

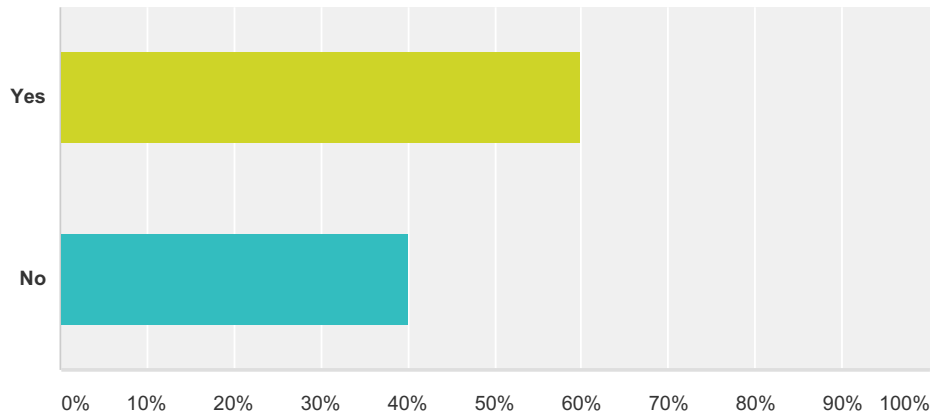
103	Less than 1 minute	8/19/2014 2:32 PM
104	8 hours/month	8/19/2014 2:31 PM
105	15 Minutes	8/19/2014 2:29 PM
106	No Time. We've made it part of our standard move-in information packet.	8/19/2014 2:28 PM
107	no extra time...it's part of the lease paperwork	8/19/2014 2:26 PM
108	5-10 minutes per property per lease/renewal.	8/19/2014 2:20 PM
109	20 Mins per property	8/19/2014 2:20 PM
110	3 Hours a month	8/19/2014 2:15 PM
111	5 to 10 minuets as most have no problems	8/19/2014 2:15 PM
112	minimal, we have them saved electronically. We send our lease document out for review by the potential renter, and in that document we attach the LBP materials(pre-filled out by us). If there is a report to be discussed on a tested house, we provide that by email.	8/19/2014 2:14 PM
113	2-3 minutes	8/19/2014 2:12 PM
114	15-20 min per property. But most of our inventory is newer than 1978	8/19/2014 2:09 PM
115	they receive the booklet and the disclosure with their documents at the time of the lease signing so just the time to explain it to them and have them sign the document - 2-3 minutes	8/19/2014 2:07 PM
116	30 minutes	8/19/2014 2:06 PM
117	less than 5 minutes	8/19/2014 2:05 PM
118	About 30 minutes	8/19/2014 2:05 PM
119	1 minute	8/19/2014 2:04 PM
120	5 seconds	8/19/2014 2:03 PM
121	About 10 minutes per lease. We write about 100 leases per month.	8/19/2014 2:03 PM
122	5 min	8/19/2014 2:03 PM
123	5 mins	8/19/2014 2:03 PM
124	10 min per lease	8/19/2014 2:02 PM
125	15 minutes	8/19/2014 2:01 PM
126	5 to 10 minutes per listing.	8/19/2014 2:00 PM
127	2 minutes	8/19/2014 2:00 PM
128	30 min	8/19/2014 1:59 PM
129	1 second	8/19/2014 1:56 PM
130	10 minutes	8/19/2014 1:55 PM
131	15 minutes if printed we email	8/19/2014 1:54 PM
132	we have integrated this into our processes, so no additional time - just additional costs with purchasing the pamphlets	8/19/2014 1:53 PM
133	extra 15 minutes per lease	8/19/2014 1:52 PM
134	Minimal	8/19/2014 1:52 PM
135	Approx 5 min per tenant.	8/19/2014 1:51 PM
136	15 minutes	8/19/2014 1:50 PM
137	10 minutes	8/19/2014 1:50 PM
138	15 minutes per lease.	8/19/2014 1:50 PM



139	no time is develop into our system. When they look at and pre 78 house they are notified of the pamphlet.	8/19/2014 1:50 PM
140	5 minutes	8/19/2014 1:50 PM
141	10 - 15 minutes	8/19/2014 1:50 PM
142	We handle mostly thru DocuSign and email. It takes about 5 additional minutes.	8/19/2014 1:48 PM
143	Minimal	8/19/2014 1:47 PM
144	30 minutes	8/19/2014 1:47 PM
145	5 min	8/19/2014 1:46 PM
146	2 Min	8/19/2014 1:46 PM
147	5 minutes	8/19/2014 1:46 PM
148	5 minutes	8/19/2014 1:46 PM
149	5 minutes	8/19/2014 1:45 PM
150	It is incorporated in our standard lease agreement	8/19/2014 1:45 PM
151	15 seconds	8/19/2014 1:44 PM
152	10 minutes per lease	8/19/2014 1:43 PM
153	Very little. It is incorporated into our lease explanation/signing process.	8/19/2014 1:43 PM
154	2 Minutes	8/19/2014 1:40 PM

**Q2 Do you encounter a financial burden in acquiring, printing/photocopying, or maintaining an inventory of lead hazard information pamphlets and copies of reports related to Lead-based Paint and Lead-Based Paint Hazards.**

Answered: 155 Skipped: 3



Answer Choices	Responses
Yes	60.00% 93
No	40.00% 62
<b>Total</b>	<b>155</b>

#	If yes, what is the financial burden to you:	Date
1	We need to make copies of the pamphlets, aside from the obvious paper costs, we incur the cost of the copier, the time that we input	9/5/2014 10:34 AM
2	Cost of copying	9/5/2014 10:32 AM
3	\$500 per year	9/5/2014 10:31 AM
4	I have to pay for the pamphlets, hire staff to track the paperwork and train this staff to know how to handle it appropriately.	9/5/2014 10:17 AM
5	Time and expense of obtaining pamphlets, but with scanned copies sent via email this has been reduced. Ones in homes cost.	8/26/2014 5:32 PM
6	We do have a policy of including a copy of the EPA pamphlet with the lease paperwork for every house that meets the standards as well as having a lead based paint disclosure as part of our lease document.	8/25/2014 9:01 PM
7	Extra clerical time in printing, photocopying, assembling, and distributing the materials all costs extra money on an ongoing bases.	8/25/2014 6:06 PM
8	Purchased 50 for \$70 from EPA	8/24/2014 1:14 PM
9	Printing the pamphlet	8/24/2014 9:41 AM
10	the cost of the paper and time printing it	8/22/2014 1:50 PM
11	\$250 a year	8/22/2014 11:17 AM

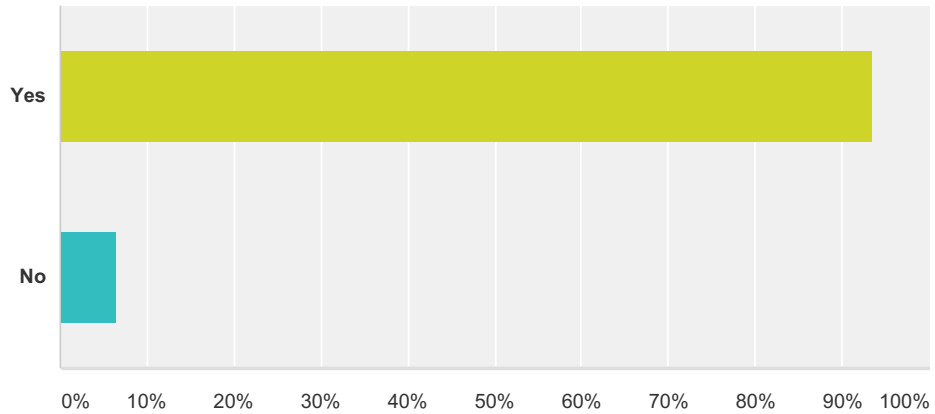
12	\$407.00 per 1000 pamphlets	8/21/2014 6:10 PM
13	We pay staff to maintain / file/ upload and get the original LBPA signed by all parties. Additional staff/ time to get the 1978 and older properties in different groups for maintenance etc.	8/21/2014 6:01 PM
14	None	8/20/2014 4:12 PM
15	ink and paper costs	8/20/2014 4:03 PM
16	The pamphlet on the EPA is not printer friendly. It does not print very well pamphlet style style and uses lots of color. There should be a default black and white one.	8/20/2014 3:56 PM
17	1. Cost of downloading & printing or purchasing booklets. 2. File space & storage of inventory 3. Staff time to explain why material is being given 4. Filing & storage of completed documents 5. Multiple copies for tenants, owners & management.	8/20/2014 11:55 AM
18	Labor to prepare the forms. Small printing costs if the lease is printed rather than electronic	8/20/2014 10:46 AM
19	time loss	8/20/2014 10:12 AM
20	time printing and paper	8/20/2014 8:05 AM
21	1.00 per booklet we use nice colored copies not black and white copies	8/19/2014 11:34 PM
22	large pamphlet 17 pages \$3.00 per copy - 2 copy minimum required	8/19/2014 11:18 PM
23	Printing a huge document is expensive and distributing it is even more expensive. Due to the cost we've started emailing the information pamphlets instead.	8/19/2014 10:54 PM
24	Purchasing the books and forms. \$3 per transaction.	8/19/2014 10:40 PM
25	We have to purchase the pamphlets from our local Real Estate Board. About 25 cents per pamphlet.	8/19/2014 10:02 PM
26	we have to go to the store where they sell the pamphlets and then purchase them. 45 minutes of time and \$25, repeated several times a year (4 or so)	8/19/2014 9:18 PM
27	cost of printing, printer, ink, and paper. Delivering the document	8/19/2014 8:38 PM
28	Cost of booklets and additional paperwork	8/19/2014 8:36 PM
29	They cost me \$.50 each from the local board of realtors. We are now well past the 1978 requirement for this... Is it really needed at this time?	8/19/2014 8:21 PM
30	Either buying, printing or copying cause a financial burden in 2 ways. 1) material costs 2) employee costs	8/19/2014 6:52 PM
31	\$2.25 per handout plus 10 min at \$25/hour	8/19/2014 6:45 PM
32	Mainly the cost of copies and labor.	8/19/2014 6:18 PM
33	There is a charge for printed pamphlets. We order them in bulk to reduce the cost.	8/19/2014 6:18 PM
34	copy costs.	8/19/2014 6:09 PM
35	Copy costs.	8/19/2014 5:58 PM
36	The financial burden depends on how many properties we have in our inventory and how many times tenants move in and out.	8/19/2014 5:48 PM
37	I don't know, but we typically just give them a link to download it to avoid the burden.	8/19/2014 5:31 PM
38	printing costs	8/19/2014 5:13 PM
39	several hundred dollars a year	8/19/2014 4:36 PM
40	copying the booklet	8/19/2014 4:35 PM
41	printing of material	8/19/2014 4:03 PM
42	I checked yes but I do not know.	8/19/2014 3:59 PM
43	Paper	8/19/2014 3:42 PM
44	It is expensive to be sure that we have all of the necessary forms and signatures	8/19/2014 3:41 PM

45	Increased toner cost and employee time to keep the files in order and produce the brochures and disclosure forms.	8/19/2014 3:40 PM
46	Yes, paper paper paper, and loss of time when we could be doing much more productive things with our time.	8/19/2014 3:38 PM
47	Printing the documents and keeping records of properties that it impacts.	8/19/2014 3:31 PM
48	Printing pamphlets and maintaining inventory	8/19/2014 3:29 PM
49	Cost of doing business. Few dollars.	8/19/2014 3:27 PM
50	\$5/ pamphlet	8/19/2014 3:20 PM
51	Cost of flyers and to download flyer. The disclosures and flyer are the same punt of pages as a contract.	8/19/2014 3:19 PM
52	Producing paper copies of a booklet nobody wants or PDF would suffice.	8/19/2014 3:15 PM
53	we don't print because of cost, we email to prospective tenants with the lease and disclosure forms to be signed.	8/19/2014 3:09 PM
54	Purchasing copies of the pamphlets and printing costs of the disclosure form. Staff time in compiling the information, maintaining the information preparing the documents.	8/19/2014 3:02 PM
55	\$2.00 per copy on the conservative side	8/19/2014 3:02 PM
56	it cost of time and money to make copies, and the copies are not as professional as the EPA books but cheaper	8/19/2014 2:51 PM
57	It is small but we still need to do it	8/19/2014 2:50 PM
58	Virtually non existant	8/19/2014 2:40 PM
59	about \$200 a month to print booklets and disclosure papers.	8/19/2014 2:38 PM
60	Printing costs and time. Although not a huge burden it would be better without the requirement.	8/19/2014 2:36 PM
61	printing cost	8/19/2014 2:34 PM
62	hundreds of dollars per year	8/19/2014 2:31 PM
63	Costly to keep in stock.	8/19/2014 2:28 PM
64	unknown of what the cost is for the time and expense to make copies	8/19/2014 2:26 PM
65	More labor than anything. It's time consuming to distinguish lead/non-lead year properties. Keeping all the records and everything related.	8/19/2014 2:20 PM
66	Unknown hours of time, unknown copies.	8/19/2014 2:20 PM
67	The real risk is making an error and the ramifications form that. The government remains the largest threat to our business	8/19/2014 2:15 PM
68	We must provide the information to each applicant.	8/19/2014 2:14 PM
69	Approximately \$1.50 per pamphlet	8/19/2014 2:12 PM
70	have no idea - toner and paper and purchase of the booklet or downloading and printing with colored copies - probably expensive - required so never really addressed the cost issue	8/19/2014 2:07 PM
71	printing costs, paper costs, employee costs, training costs, storage costs	8/19/2014 2:05 PM
72	cost of printing - it isn't a huge expense	8/19/2014 2:04 PM
73	Purchasing the pamphlets and shipping costs.	8/19/2014 2:03 PM
74	\$2.00 per lease	8/19/2014 2:02 PM
75	Prinitng and labor \$550 a year	8/19/2014 2:01 PM
76	~ \$100 per year.	8/19/2014 2:00 PM
77	unclear but certainly hundreds of \$ over the course of the year including man hours	8/19/2014 1:59 PM
78	printing costs	8/19/2014 1:56 PM
79	Printing many pamphlets costs my company in both time and money.	8/19/2014 1:55 PM

80	About .20 per lease we write.	8/19/2014 1:53 PM
81	cost of paper and ink	8/19/2014 1:52 PM
82	Don't know the exact cost, but nothing is free.	8/19/2014 1:52 PM
83	The pamphlet is \$0.50 for us to purchase for each tenant. Making copies of any forms and the time to look up if there are any records is time consuming. Training staff on where to find records is also time consuming.	8/19/2014 1:51 PM
84	No financial burden. Just time spend gathering and distributing documents.	8/19/2014 1:50 PM
85	I cost paper every time we print it. Its also available to our prospects as a download but we hand one to them to ensure they are aware.	8/19/2014 1:50 PM
86	I have to pay for photo copies	8/19/2014 1:50 PM
87	No, we email the tenant a copy of the pamphlet which gives us proof they were supplied with the information.	8/19/2014 1:48 PM
88	copying the reports	8/19/2014 1:47 PM
89	The coat to buy or copy as well as time to inventory make copies or put in lease package . Estimate cost 7.00 per	8/19/2014 1:46 PM
90	Few dollars a year	8/19/2014 1:46 PM
91	ink	8/19/2014 1:46 PM
92	minimal	8/19/2014 1:45 PM
93	Printing costs	8/19/2014 1:45 PM

**Q3 Do you understand that you are required to maintain in your records for 3 years, copies of the acknowledgment forms/receipts, and related certifications that the lessee are required to receive?**

Answered: 157 Skipped: 1



Answer Choices	Responses
Yes	93.63% 147
No	6.37% 10
<b>Total</b>	<b>157</b>

### Q4 How much time does it take for you or your staff to document and file acknowledgement forms/receipts, and lead related certifications?

Answered: 150 Skipped: 8

#	Responses	Date
1	about one minute	9/5/2014 10:34 AM
2	10 minutes per	9/5/2014 10:32 AM
3	30 minutes	9/5/2014 10:31 AM
4	it's just a few minutes.	9/5/2014 10:23 AM
5	It's one more detail within a myriad of details that has to be accounted for	9/5/2014 10:19 AM
6	Too Much. I have to pay for the pamphlets, hire staff to track the paperwork and train this staff to know how to handle it appropriately.	9/5/2014 10:17 AM
7	15 minutes per file	9/5/2014 10:15 AM
8	We keep it with the tenant lease at all times	8/29/2014 10:24 AM
9	minutes	8/27/2014 1:31 PM
10	15 minutes	8/26/2014 5:32 PM
11	Again, about 5 minutes per lease (no more than 5 hours per month)	8/25/2014 9:01 PM
12	Several hours a month to send out new forms and get receipts for lead properties every two years.	8/25/2014 6:06 PM
13	No additional time. It's part of the lease packet	8/24/2014 10:19 PM
14	1 hour per tenant	8/24/2014 1:14 PM
15	A minute per lease	8/24/2014 9:41 AM
16	10 15 minutes	8/22/2014 6:43 PM
17	5 minutes as the whole rental packet is scanned to the online folder	8/22/2014 4:39 PM
18	negligible, it's scanned in with the lease and stored electronically	8/22/2014 1:50 PM
19	5 minutes	8/22/2014 11:17 AM
20	3 hours (lease signing, checking the lease for completion, scanning)	8/21/2014 6:10 PM
21	Hard to say exactly but each Property Manager spends time to get all documents signed - getting signatures on ONE page can be difficult at times	8/21/2014 6:01 PM
22	seconds to upload & save to the cloud	8/21/2014 1:56 PM
23	No additional time as it is done as part of the lease agreement	8/21/2014 12:50 PM
24	couple of minutes	8/21/2014 12:07 PM
25	5 minutes	8/21/2014 8:27 AM
26	Very little, our office is paperless, so all forms are electronically stored.	8/21/2014 12:51 AM
27	Very little	8/20/2014 4:12 PM
28	At least a few minutes each time - multiply this by 600	8/20/2014 4:03 PM
29	5 min	8/20/2014 3:56 PM

30	1 min	8/20/2014 12:34 PM
31	less than 5 minutes	8/20/2014 11:55 AM
32	***** This is the real problem. Trying to get the tenants agent to sign the disclosure is really hard. They do not want to show up just to sign that one form. I really wish we could get their name off of it or make that name optional.	8/20/2014 10:46 AM
33	Done electronically	8/20/2014 10:42 AM
34	prob 20 minutes per file	8/20/2014 10:12 AM
35	five min	8/20/2014 8:05 AM
36	1 minute. Documentation and acknowledgment is accomplished at lease signing as part of the standard lease agreement.	8/20/2014 6:54 AM
37	it is recorded with all other documents so we do not calculate an additional time	8/19/2014 11:34 PM
38	1-2 hours or employee time at hourly rate	8/19/2014 11:18 PM
39	5 minutes per lease or lease renewal.	8/19/2014 10:54 PM
40	Minutes. Contractor provides detail also about any repair and how they handled the details of repair	8/19/2014 10:46 PM
41	15 minutes	8/19/2014 10:40 PM
42	About 30 minutes from start to finish at \$15/hour.	8/19/2014 10:02 PM
43	5 min	8/19/2014 9:52 PM
44	5 extra minutes per new tenant	8/19/2014 9:18 PM
45	30 minutes	8/19/2014 9:14 PM
46	1 hour	8/19/2014 8:38 PM
47	5 minutes	8/19/2014 8:36 PM
48	5 minutes each occasion	8/19/2014 8:21 PM
49	10 minutes	8/19/2014 7:27 PM
50	2 mins	8/19/2014 7:17 PM
51	7 minutes per home	8/19/2014 6:52 PM
52	Included on the lease form. Haven't filed a separate copy	8/19/2014 6:45 PM
53	About 15 minutes.	8/19/2014 6:36 PM
54	not sure	8/19/2014 6:35 PM
55	1 day	8/19/2014 6:33 PM
56	1 day	8/19/2014 6:33 PM
57	Seconds. We use DocuSign and upload docs.	8/19/2014 6:18 PM
58	.25 hours	8/19/2014 6:18 PM
59	10 mins. documents are stored with owner or tenant files	8/19/2014 6:18 PM
60	a few minutes per file	8/19/2014 6:09 PM
61	About 10 - 30 minutes per file.	8/19/2014 5:58 PM
62	5 minutes	8/19/2014 5:48 PM
63	5 hours per month	8/19/2014 5:46 PM
64	1-2 hours	8/19/2014 5:38 PM
65	Probably 10 minutes per lease when we do it.	8/19/2014 5:31 PM



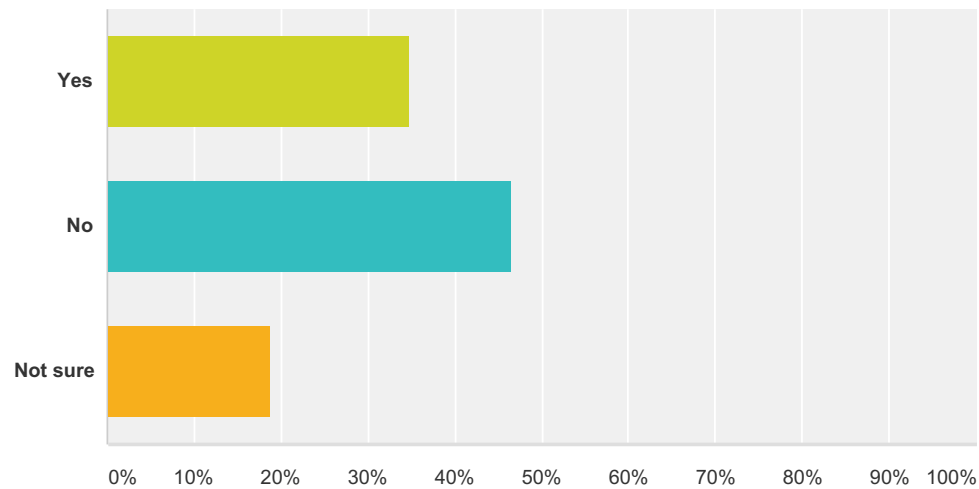
66	5 minutes	8/19/2014 5:17 PM
67	5 minutes	8/19/2014 5:13 PM
68	5 mins. per lease	8/19/2014 4:51 PM
69	15-20 minutes per lease	8/19/2014 4:36 PM
70	12 hours a year	8/19/2014 4:35 PM
71	15 minutes to scan, print and save	8/19/2014 4:26 PM
72	1hr/month	8/19/2014 4:14 PM
73	5 minutes	8/19/2014 4:03 PM
74	I don't know. Its all part of the lease signing renewing process.	8/19/2014 3:59 PM
75	30 SECONDS	8/19/2014 3:55 PM
76	it is included with the contract, so it doesn't take any extra time	8/19/2014 3:51 PM
77	I don't know	8/19/2014 3:42 PM
78	3 hours per week	8/19/2014 3:41 PM
79	10 extra minutes	8/19/2014 3:40 PM
80	It can vary each month, year, or new cycle of requirements. We have had to chase down vendors to get them certified or discontinue business with them if they do not attain the certification. From there, it's an issue to always find a certified vendor to replace vendors we've had to discontinue business with.	8/19/2014 3:38 PM
81	Undetermined but significant	8/19/2014 3:31 PM
82	We scan documents and file originals as well - probably another 5 minutes per lease.	8/19/2014 3:29 PM
83	Few minutes. Signed copies are scanned with copy of lease.	8/19/2014 3:27 PM
84	20 minutes	8/19/2014 3:19 PM
85	10 minutes	8/19/2014 3:18 PM
86	1 minute per lease (it's just an extra page or two, but it all adds up.)	8/19/2014 3:15 PM
87	20 min	8/19/2014 3:09 PM
88	1 hour	8/19/2014 3:05 PM
89	At least 5 minutes per transaction.	8/19/2014 3:02 PM
90	10 minutes plus	8/19/2014 3:02 PM
91	30minutes	8/19/2014 2:58 PM
92	less than 5 minutes	8/19/2014 2:56 PM
93	5-7 minutes - depends on the number of occupants	8/19/2014 2:51 PM
94	not much	8/19/2014 2:50 PM
95	probably 20-30 minutes per transaction.	8/19/2014 2:48 PM
96	30 minutes	8/19/2014 2:44 PM
97	Five minutes	8/19/2014 2:40 PM
98	10- 15 mins	8/19/2014 2:38 PM
99	less than 5 minutes in sky slope	8/19/2014 2:38 PM
100	unknown	8/19/2014 2:36 PM
101	The go with the lease so next extra time	8/19/2014 2:34 PM
102	less than 1 minute	8/19/2014 2:32 PM

103	8 hours/month	8/19/2014 2:31 PM
104	10 minutes	8/19/2014 2:29 PM
105	It is part of our lease package. No time.	8/19/2014 2:28 PM
106	3 hours per week	8/19/2014 2:26 PM
107	15 min per property	8/19/2014 2:20 PM
108	5 Mins per property	8/19/2014 2:20 PM
109	3 hours a month	8/19/2014 2:15 PM
110	30 minuets	8/19/2014 2:15 PM
111	Very little. We save everything electronically(and that is backed up on several off site servers every night). We use our accounting software to group the houses into tested/not tested/ tested has lbp/ tested no lbp/ built after 1978. It is easy for anyone to see and keep track of.	8/19/2014 2:14 PM
112	0	8/19/2014 2:12 PM
113	all forms are routinely filed so no extra time for these forms	8/19/2014 2:09 PM
114	Not sure - so many things we are required to give Tenants and get acknowledgements so it is all combined	8/19/2014 2:07 PM
115	30 minutes	8/19/2014 2:06 PM
116	6 minutes	8/19/2014 2:05 PM
117	Within that 30 minutes estimated in question 1	8/19/2014 2:05 PM
118	minimal	8/19/2014 2:04 PM
119	5 seconds	8/19/2014 2:03 PM
120	Several hours per month	8/19/2014 2:03 PM
121	30 min	8/19/2014 2:03 PM
122	The disclosure at lease signing is instant. Disclosures for mid-lease work are more complicated and can take an hour.	8/19/2014 2:03 PM
123	10 min per lease	8/19/2014 2:02 PM
124	15 to 30 minutes	8/19/2014 2:01 PM
125	5 to 10 minutes per listing.	8/19/2014 2:00 PM
126	5 minutes	8/19/2014 2:00 PM
127	2 seconds	8/19/2014 1:56 PM
128	Unknown	8/19/2014 1:55 PM
129	hoard to determine, as we have integrated this in with other documents to be filed and maintained	8/19/2014 1:53 PM
130	10 minutes per lease	8/19/2014 1:52 PM
131	approx 30 minutes per each move in.	8/19/2014 1:51 PM
132	30 minutes per lessee	8/19/2014 1:50 PM
133	15 minutes	8/19/2014 1:50 PM
134	About 15 minutes per lease.	8/19/2014 1:50 PM
135	everything is scanned and saved into cloud. It part of any function related to lease up.	8/19/2014 1:50 PM
136	10 minutes	8/19/2014 1:50 PM
137	5 minutes	8/19/2014 1:50 PM
138	5-10 minutes	8/19/2014 1:48 PM

139	Minimal	8/19/2014 1:47 PM
140	30 minutes	8/19/2014 1:47 PM
141	1 min	8/19/2014 1:46 PM
142	Few min	8/19/2014 1:46 PM
143	1 hour per property	8/19/2014 1:46 PM
144	5 minutes	8/19/2014 1:46 PM
145	5 minutes	8/19/2014 1:45 PM
146	30 minuets per property	8/19/2014 1:45 PM
147	10 minutes, done along with other paperwork	8/19/2014 1:44 PM
148	10 minutes per lease	8/19/2014 1:43 PM
149	Very little. We store all documents electronically. Anything with a signature gets scanned into the system.	8/19/2014 1:43 PM
150	1 Minute	8/19/2014 1:40 PM

### Q5 Do you encounter a financial burden maintaining these acknowledgement forms/receipts, and lead related certifications, and copies of reports related to Lead-Based Paint and Lead-Based Paint Hazards?

Answered: 155 Skipped: 3



Answer Choices	Responses
Yes	34.84% 54
No	46.45% 72
Not sure	18.71% 29
<b>Total</b>	<b>155</b>

#	If yes, What is the financial burden to you?	Date
1	Cost of storage and waste of our time	9/5/2014 10:32 AM
2	\$500 per year	9/5/2014 10:31 AM
3	Probably not, except collectively.	9/5/2014 10:23 AM
4	I have to pay for the pamphlets, hire staff to track the paperwork and train this staff to know how to handle it appropriately.	9/5/2014 10:17 AM
5	buying a special color folder for lead based paint files and they cost more. At least \$5.00 per file.	9/5/2014 10:15 AM
6	It adds about \$600.00 more per year to our copier costs and an extra sheet to our long term file size.	8/25/2014 9:01 PM
7	See above.	8/25/2014 6:06 PM
8	Cost of physical and electronic file systems.	8/24/2014 1:14 PM
9	Staff tie - printing, scanning, filing	8/22/2014 6:43 PM
10	see above	8/22/2014 1:50 PM
11	Staff Time	8/21/2014 6:01 PM

12	physical space requirements	8/20/2014 11:55 AM
13	staff time and audits	8/20/2014 8:05 AM
14	employee's time	8/19/2014 11:18 PM
15	We have to print the acknowledgement of receipt form, meet the tenant to get their signature, then scan, file, and store the document. There's a labor cost as well as a cost for the scanner, file cabinet, data storage, etc.	8/19/2014 10:54 PM
16	File space and storage as well as shredding.	8/19/2014 10:40 PM
17	Time associated with this task about an hour at \$15/hour.	8/19/2014 10:02 PM
18	Cost to pay employees to maintain.	8/19/2014 9:14 PM
19	I do have to pay staff to file and maintain.	8/19/2014 6:36 PM
20	Mainly the cost of copies and labor.	8/19/2014 6:18 PM
21	digitized in our software	8/19/2014 6:09 PM
22	Labor costs to copy, scan, and file everything. Our local EPA office told us that we must have original signatures on the Addendum, that electronic signatures were not acceptable.	8/19/2014 5:58 PM
23	It's yet one more thing to document which costs time and storage space.	8/19/2014 5:48 PM
24	time and space	8/19/2014 5:46 PM
25	Not any more than keeping a lease. We just have it built into the lease.	8/19/2014 5:31 PM
26	printing and handling costs	8/19/2014 5:13 PM
27	Employee time and payroll expense	8/19/2014 4:36 PM
28	It takes time to be sure that all of these forms are signed and maintained!	8/19/2014 3:41 PM
29	Toner usage and employee time tracking, filing and executing the forms.	8/19/2014 3:40 PM
30	Yes, office space is limited enough, now we have to keep additional records on file for other companies that we have no ownership in or any dealings with their personal day to day operations.	8/19/2014 3:38 PM
31	Cost of doing business. Few dollars.	8/19/2014 3:27 PM
32	Anything that distracts me from my primary function is by default, a burden. It's a waste of my time and filing for something that is largely immaterial in my local market.	8/19/2014 3:15 PM
33	extra time to scan the paperwork	8/19/2014 3:09 PM
34	It is small, but has to be part of our overall technology budget in maintain files on the server and backups.	8/19/2014 3:02 PM
35	The burden is having to pay people to keep track of stupid government forms that we have literally never had to use for anything ever in 22 years of me leasing property!	8/19/2014 2:48 PM
36	Personnel time, storage room	8/19/2014 2:38 PM
37	requires time away from other duties	8/19/2014 2:36 PM
38	Costly to keep the myriad of forms and brochures in stock.	8/19/2014 2:28 PM
39	Very labor intensive when you manage 1600 properties.	8/19/2014 2:20 PM
40	Admin time/payroll	8/19/2014 2:20 PM
41	We pay for our server space to save them all electronically. However, I am not sure that is what this question is referring to.	8/19/2014 2:14 PM
42	No dollar amount - but storage costs for sure over the years.	8/19/2014 2:07 PM
43	storage costs	8/19/2014 2:06 PM
44	Cost of staff time is about \$800 per month	8/19/2014 2:03 PM
45	\$2.00 per lease	8/19/2014 2:02 PM

46	Approx \$900 a year	8/19/2014 2:01 PM
47	Nominal.	8/19/2014 2:00 PM
48	File space. File cabinets	8/19/2014 1:53 PM
49	cost to maintain the files for required time	8/19/2014 1:52 PM
50	Storage costs	8/19/2014 1:52 PM
51	Maintaining the file is OK. It is the preparation that is costly to me.	8/19/2014 1:51 PM
52	About \$5/per month.	8/19/2014 1:50 PM
53	Salary for employee who does my filing	8/19/2014 1:50 PM
54	time	8/19/2014 1:46 PM
55	additional scanning time	8/19/2014 1:45 PM

## Q6 How much time did it take you and your staff to understand your responsibilities and actions which must occur before any lease of target housing?

Answered: 123 Skipped: 35

#	Responses	Date
1	none	9/5/2014 10:31 AM
2	Sent an employee to become certified tester -- not to test, but to be educated, so it took one employee all day, plus an uncertain amount of time to pass on the information.	9/5/2014 10:23 AM
3	Too much.	9/5/2014 10:19 AM
4	I have to pay for the pamphlets, hire staff to track the paperwork and train this staff to know how to handle it appropriately.	9/5/2014 10:17 AM
5	One hour seminar	9/5/2014 10:15 AM
6	unknown	8/29/2014 10:24 AM
7	1 hour	8/26/2014 5:32 PM
8	We have each had an annual training course which takes about 2 hours.	8/25/2014 9:01 PM
9	Sent staff to required training classes. Which also cost a tuition fee.	8/25/2014 6:06 PM
10	Hard to say. there was a lot of training when this initially came out and the again with the RRP	8/24/2014 10:19 PM
11	I teach a 2 hour course covering the requirements. All staff must attend.	8/24/2014 1:14 PM
12	1 to 2 hours	8/22/2014 6:43 PM
13	???	8/22/2014 4:39 PM
14	unknown	8/22/2014 1:50 PM
15	months	8/22/2014 11:17 AM
16	One hour of instruction.	8/21/2014 6:10 PM
17	confusing question	8/21/2014 6:01 PM
18	Taking a seminar was probably the most time spent understanding my obligation to the LBP form & responsibilities of its use	8/21/2014 1:56 PM
19	Very little	8/21/2014 12:50 PM
20	We all know the EPA rules so whenever we take over a unit that was built before 1978 it is automatic.	8/21/2014 12:07 PM
21	1 hour of training	8/21/2014 8:27 AM
22	It was part of our initial Real Estate licensing course.	8/21/2014 12:51 AM
23	1 month	8/20/2014 3:56 PM
24	20 min	8/20/2014 12:34 PM
25	less than 30 minutes when researching target property age	8/20/2014 11:55 AM
26	Not much.	8/20/2014 10:46 AM
27	hours	8/20/2014 10:12 AM
28	five min	8/20/2014 8:05 AM
29	1 hour	8/20/2014 6:54 AM

30	research sometimes 4 hours	8/19/2014 11:18 PM
31	Not much because it's part of our normal process.	8/19/2014 10:54 PM
32	We know what is needed and all contractors are certified	8/19/2014 10:46 PM
33	12 minutes	8/19/2014 10:40 PM
34	1-2 hours of reading and discussing the information.	8/19/2014 10:02 PM
35	Hours. Have to make sure that the owner provides the correct information which is the biggest time consuming . Sometimes it's takes 3 to 4 request from an owner to provide the correct information.	8/19/2014 9:52 PM
36	1 to 2 hours of training, depending upon the job responsibilities. Maintenance department is higher, 3 hours or so, plus follow up supervision	8/19/2014 9:18 PM
37	30 minutes	8/19/2014 9:14 PM
38	1/2 day	8/19/2014 8:38 PM
39	1 hour	8/19/2014 8:36 PM
40	None, You learned this before you got your real estate license!	8/19/2014 8:21 PM
41	Not a clear question because this has been known for years.	8/19/2014 7:27 PM
42	5 minutes	8/19/2014 6:52 PM
43	Training class - 4 hours per person	8/19/2014 6:45 PM
44	10 minutes initially and then reminded during training meetings.	8/19/2014 6:36 PM
45	minimal time to understand	8/19/2014 6:35 PM
46	In real estate school	8/19/2014 6:18 PM
47	1 hr training on all parts of the lease agreement	8/19/2014 6:18 PM
48	We present classes in the office for training each year.	8/19/2014 5:58 PM
49	Ongoing to make sure we're not missing something	8/19/2014 5:48 PM
50	1/2 hour	8/19/2014 5:46 PM
51	24 hours	8/19/2014 5:38 PM
52	10 years.	8/19/2014 5:31 PM
53	none	8/19/2014 5:17 PM
54	4 hours of training	8/19/2014 5:13 PM
55	1 hr.	8/19/2014 4:51 PM
56	1 hour	8/19/2014 4:36 PM
57	On going training	8/19/2014 4:35 PM
58	Part of MCE	8/19/2014 4:26 PM
59	Unknown	8/19/2014 3:59 PM
60	5 MINUTES	8/19/2014 3:55 PM
61	they are very well trained that the lead forms must be presented before the lease	8/19/2014 3:51 PM
62	A lot of time, research, and we had to make our vendors aware of the requirements once we understood it. We also had to have meetings with other companies regarding their requirements AND our company had to have a few staff meetings surrounding these changes.	8/19/2014 3:38 PM
63	Multiple classes and training.	8/19/2014 3:31 PM
64	Each new staff member has to be trained - not a long process but does take time.	8/19/2014 3:29 PM



65	Just a few minutes. Has been federal law for decades. Should be understood within the industry and even most tenants know something about this.	8/19/2014 3:27 PM
66	Training time	8/19/2014 3:19 PM
67	10 minutes	8/19/2014 3:18 PM
68	not much	8/19/2014 3:09 PM
69	2 hours	8/19/2014 3:05 PM
70	Initial training of approximately an hour per new staff member and regular updates on a quarterly basis.	8/19/2014 3:02 PM
71	30 minutes of class room instruction	8/19/2014 3:02 PM
72	Less than 5 minutes	8/19/2014 2:56 PM
73	went to several short classes and only hire lead base certified contractors	8/19/2014 2:51 PM
74	2-3 hours	8/19/2014 2:48 PM
75	several hours	8/19/2014 2:44 PM
76	30 seconds	8/19/2014 2:40 PM
77	6 hour class	8/19/2014 2:38 PM
78	very little	8/19/2014 2:38 PM
79	1 minute	8/19/2014 2:37 PM
80	unknown	8/19/2014 2:36 PM
81	not much	8/19/2014 2:34 PM
82	Less tha 4 hours.	8/19/2014 2:32 PM
83	minimal	8/19/2014 2:31 PM
84	none	8/19/2014 2:29 PM
85	20 hours	8/19/2014 2:28 PM
86	1 hour	8/19/2014 2:26 PM
87	The time it took to take a class on it. Cost of class and travel expense.	8/19/2014 2:20 PM
88	2 years possibly.	8/19/2014 2:20 PM
89	3 hours	8/19/2014 2:15 PM
90	We train all staff members when they are hired as part of their entry training so it is hard to say.	8/19/2014 2:14 PM
91	Less than 15 minutes.	8/19/2014 2:12 PM
92	honestly there is little info out there. Maybe should be added to a class.	8/19/2014 2:09 PM
93	Not clear what this question refers to, I don't know what target housing is - we just rent regular homes so am unaware of this classification	8/19/2014 2:07 PM
94	1 hour of training	8/19/2014 2:06 PM
95	10 minutes per employee	8/19/2014 2:05 PM
96	An hour, initially.	8/19/2014 2:05 PM
97	5 minutes	8/19/2014 2:04 PM
98	5 minutes	8/19/2014 2:03 PM
99	About 3 hours of training per year per employee.	8/19/2014 2:03 PM
100	10 min	8/19/2014 2:03 PM
101	1 hour	8/19/2014 2:03 PM

102	none	8/19/2014 2:02 PM
103	60 minutes	8/19/2014 2:01 PM
104	5 minutes	8/19/2014 2:00 PM
105	5 minutes	8/19/2014 2:00 PM
106	no long	8/19/2014 1:59 PM
107	1 second	8/19/2014 1:56 PM
108	I haven't taken new managements in older homes.	8/19/2014 1:55 PM
109	We are all licensed Real Estate Brokers, so we all have this knowledge as ti is part of our licensing	8/19/2014 1:53 PM
110	15 minutes	8/19/2014 1:52 PM
111	average	8/19/2014 1:51 PM
112	1 hour	8/19/2014 1:50 PM
113	30 minutes	8/19/2014 1:50 PM
114	1 hour of training per year or new hire.	8/19/2014 1:50 PM
115	no much this is very well known requirements.	8/19/2014 1:50 PM
116	30 minutes	8/19/2014 1:50 PM
117	one hour	8/19/2014 1:50 PM
118	Minimal	8/19/2014 1:47 PM
119	Several hours of education and continuing education	8/19/2014 1:47 PM
120	hours	8/19/2014 1:46 PM
121	took some classes and read the info, maybe 3 hours	8/19/2014 1:46 PM
122	Not too much	8/19/2014 1:44 PM
123	Very little. These rules have been around for quite some time.	8/19/2014 1:43 PM

## Q7 Do you have any other suggestions or comments on how to proceed with the disclosure of information required above?

Answered: 99 Skipped: 59

#	Responses	Date
1	Do away with it; all it does is confuse the tenant	9/5/2014 10:32 AM
2	Stop using it! It's outdated as we are in a new century compared to when the 1978 base line was established.	9/5/2014 10:31 AM
3	Comment: Lead paint disclosure is warranted and worth it, eliminate some of the petty EPA reporting requirements and other requirements that are just bureaucratic silliness.	9/5/2014 10:23 AM
4	Apply this ruling ONLY TO MULTI-FAMILY HOUSING, not single family housing.	9/5/2014 10:19 AM
5	do away with the program	9/5/2014 10:15 AM
6	Too few of our properties were built prior to 1978 that it is not known how to make a suggestion. We keep our properties in good condition so there is little chance for problems with pre 1978 homes.	8/26/2014 5:32 PM
7	If we could get away with simply referring them to a website rather than having to print out the pamphlet that none of them read, it would save time and money.	8/25/2014 9:01 PM
8	I really think that 98% of our tenants do not read the materials.	8/25/2014 6:06 PM
9	No	8/24/2014 10:19 PM
10	Yes, We should be allowed to produce the pamphlet and disclosure forms and allow for electronic signature.	8/24/2014 1:14 PM
11	It has been over 35 years since lead based paint has been used. We need to reduce it to a paragraph in our leases with a website the tenants can go to to do their due diligence.	8/24/2014 9:41 AM
12	No	8/22/2014 4:39 PM
13	Change the regulation to direct applicants and renters to an EPA or HUD website that contains all the info, and simply have these folks sign an acknowledgment that they know where to get the info.	8/22/2014 11:17 AM
14	Do not require that a paper copy be given to the lessee. Provide online access to the information.	8/21/2014 6:10 PM
15	Make it a universal one page form & have the LBP pamphlet available as PDF document on a national website.	8/21/2014 1:56 PM
16	Keep them in a folder on your computer.	8/21/2014 12:07 PM
17	No	8/21/2014 8:27 AM
18	On the Lead Based Paint Disclosure to Tenants, it would be much cleaner and easier if the owner were not required to sign it. We already have their signature on the Duties of the Landlord form and the Lead Based Paint Disclosure (Rentals). As the agent for the owner, we should also be able to sign this for them as we do the lease and other disclosures.	8/21/2014 12:51 AM
19	No one reads the pamphlets - I think it would be better to simply refer them to a public website where they could go if they wanted to get more information.	8/20/2014 4:03 PM
20	More concise paperwork. In New Mexico there are several lead based paint forms, for lease, sell, remodel, etc. Consolidating them down to 1 basic form would be helpful.	8/20/2014 3:56 PM
21	give link on website and save cost and paper	8/20/2014 8:05 AM
22	No	8/20/2014 6:54 AM
23	I would like to be able to have the tenants sign the disclosure form and email it to them or have them esign.	8/19/2014 11:18 PM

24	The disclosure requirement is really a problem. I really would like to see the EPA make it easier to electronically distribute the information OR make it legal for us to just provide a website URL for the tenant to obtain the information. Something similar to the Megan's law disclosure in California. It's so simple that it's just built in to our standard lease language and doesn't require distribution of a information pamphlet or tracking the tenant's acknowledgement.	8/19/2014 10:54 PM
25	No with the books provided as used with any property disclosure with a sale, we are covered	8/19/2014 10:46 PM
26	Form to the owners/sellers on how important it is to fill out the information completely. Initials and signatures.	8/19/2014 9:52 PM
27	The form should be not so strict - being able to fill it out in multi-part so all the signatures are not required to be on the same piece of paper as in our sales contracts, would be a help. Also, if the property owner fails to sign the document on the proper line, it should be have dire consequences to the real estate professional. Enforcement should target those who do not get the message across, not those who sign on line 3 instead of line 4.	8/19/2014 9:18 PM
28	HUD should provide the "Protect Your Family From Lead in Your Home" This is a 17 page document and it costs a lot for me to print.	8/19/2014 8:38 PM
29	It is built into any good lease, why do you also require the separate pamphlet/signature certificate?	8/19/2014 8:21 PM
30	We have full lead testing performed by a certified company with an XRF machine on all properties built before 1978 so we include the full report to all applicants.	8/19/2014 7:27 PM
31	Just do it when talking about the lease. Talk about to the owners when they are initiating our services.	8/19/2014 6:36 PM
32	The forms are burdensome. The property manager has the ability to sign everything on behalf of the owner under property management agreement, the disclosure form requires the owner's signature, however.	8/19/2014 6:35 PM
33	providing web site????	8/19/2014 6:33 PM
34	providing web site????	8/19/2014 6:33 PM
35	Create an on-line form that can be completed and stored "on-line" .	8/19/2014 6:18 PM
36	no	8/19/2014 6:18 PM
37	Permit electronic signatures so we can email the info and addendum to the tenant and get them to sign a form that can be filed electronically.	8/19/2014 5:58 PM
38	no	8/19/2014 5:38 PM
39	I would like to see the pamphlet distribution requirement removed and instead allow a link to where it could be found online. Most tenants don't read it anyway. Save the environment and still give them access to the info.	8/19/2014 5:31 PM
40	most tenants have little concern regarding this issue. Possibly, an awareness campaign letting tenants know where information can be obtained would be constructive and replace that from the pamphlet. Also, in th ensuing 36 years since most lead paint has ceased usage..I know of no owners who are aware of it being on their property and it has been a long long time since we had to do a remediation.	8/19/2014 5:17 PM
41	Online	8/19/2014 5:13 PM
42	have a web link rather than a printed pamphlet	8/19/2014 4:36 PM
43	Do not manage any targeted properties.	8/19/2014 4:35 PM
44	none	8/19/2014 4:26 PM
45	No	8/19/2014 3:59 PM
46	The on-line brochure available for download and print does not copy front to back correctly and it would be helpful to obtain one download that is a single sided and another for use of double sided printing.	8/19/2014 3:55 PM
47	no	8/19/2014 3:51 PM
48	It's too much trouble for property managers and the tenants don't read it anyway.	8/19/2014 3:42 PM
49	I wish there was just one disclosure that could be given to everyone. Saying that lead paid does exist, may exist or is not known to exist is kinda silly. One disclosure should cover all possibilities.	8/19/2014 3:27 PM
50	It should be an electronic document that can be emailed and digitally signed.	8/19/2014 3:20 PM
51	Just include in lease.	8/19/2014 3:19 PM

52	We require all owners sign a lead based paint disclosure form regardless of the year the home was built. We don't want anything to slip through. We will not list the home until all contract addendums are completed. All tenants are provided pamphlets at check in along with a disclosure form to sign. The agent will also sign the form. Tenants are provided a copy of the form with their move in documents. We highlighted the areas in different colors where the different parties are to sign to avoid confusion.	8/19/2014 3:18 PM
53	Allow the prospect to OPT OUT of the pamphlet to shed light on how few people want it or are concerned with it.	8/19/2014 3:15 PM
54	No	8/19/2014 3:05 PM
55	Allow the owner and agent to distribute the pamphlet virtually by providing the EPA website link to persons.	8/19/2014 3:02 PM
56	stop putting all the responsibility on the agents. Start making buyers and tenants take a course offered by the gov't to inform them instead of us. the level of responsibility is unfairly put on the real estate agent for no reason. Gov't allowed the lead in paint , not us.	8/19/2014 2:58 PM
57	I require the disclosure on ALL properties, that way it's a standard practice.	8/19/2014 2:56 PM
58	the fines are so intense and the expense to do the repairs are causing owners not to do the repairs which in turn decreases values of the neighborhood.	8/19/2014 2:51 PM
59	yes, get rid of the written form requirements and just have us make a disclosure in the lease.	8/19/2014 2:48 PM
60	No	8/19/2014 2:40 PM
61	There should be no need to give the booklet again when work needs to be done. If you have an acknowledgement that it was given to them when they moved in.	8/19/2014 2:38 PM
62	na	8/19/2014 2:38 PM
63	only require disclosure if there is a known hazzard	8/19/2014 2:36 PM
64	Booklets should be provided	8/19/2014 2:34 PM
65	The address of the target property should be a required item of the form. At the moment, we must write this into the form and since there is no address listed, should a problem arise, the notice is not specific as to what property the owner had reports for	8/19/2014 2:32 PM
66	electronic booklet	8/19/2014 2:31 PM
67	It is part of our standard leasing package	8/19/2014 2:29 PM
68	Reduced pamphlet size, simplified process.	8/19/2014 2:28 PM
69	no	8/19/2014 2:26 PM
70	Do we really need this disclosure anymore. How many really are an issue. At what point do we need a disclosure for everything.	8/19/2014 2:20 PM
71	Stop managing homes built before 1978.	8/19/2014 2:20 PM
72	The required form and distribution of booklet is obsolete at this point and should not be required. Only disclosure should be required when there is a know un treated known exposure	8/19/2014 2:15 PM
73	Providing an electronic version of the how to protect your family document would be amazing! Right now we have spent a great deal of time scanning every page of the book into a 25 page pdf document. This obviously is very long. It would be great to have it in a smaller electronic version that can be used.	8/19/2014 2:14 PM
74	It would be nice if we could refer our tenants to a website or some other electronic means.	8/19/2014 2:12 PM
75	Since I am not clear about the above question, no. I would suggest that the easier the better as there are so many requirements and obligations in the process of selling and renting properties that making a process cumbersome is not a welcome requirement to the housing service providers.	8/19/2014 2:07 PM
76	no. not unhappy to do it.	8/19/2014 2:05 PM
77	No.	8/19/2014 2:05 PM
78	no	8/19/2014 2:04 PM
79	Allowing Managers to have language in their leases to eliminate the need for a separate addendum would be great.	8/19/2014 2:03 PM

80	send all info	8/19/2014 2:03 PM
81	It is pointless that the disclosure must occur again for mid-lease work.	8/19/2014 2:03 PM
82	Get rid of it, tenants never read it anyway and a huge waste of government money	8/19/2014 2:02 PM
83	Kids grew up fine around lead base paints just scrap the whole thing	8/19/2014 2:01 PM
84	No	8/19/2014 2:00 PM
85	It is a total waste of time. Absolutely ridiculous. Every owner says they have no knowledge and every tenant signs it without reading anything. It's been 36 years of paint coats, how long will this nonsense continue?	8/19/2014 1:56 PM
86	Shorten brochure, or allow landlord to include website link in lease instead of handing out brochure.	8/19/2014 1:55 PM
87	NO	8/19/2014 1:53 PM
88	No	8/19/2014 1:50 PM
89	No	8/19/2014 1:50 PM
90	Provide us with proper links to your site where forms can be downloaded by tenants directly.	8/19/2014 1:50 PM
91	We attach the download booklet to every pre 78 house advertisement. I would suggest all managers to the same	8/19/2014 1:50 PM
92	make the pamphlets more accessible. We cannot readily find them	8/19/2014 1:50 PM
93	Pamphlets are not readily available and are expensive to photo copy, especially in color. Is there are source for these pamphlets that is available and affordable?	8/19/2014 1:50 PM
94	No	8/19/2014 1:47 PM
95	I don't think any resident has ever read the information`	8/19/2014 1:47 PM
96	We should be able to send it by email or electronically and have a receipt!	8/19/2014 1:46 PM
97	We send them and store them electronically.	8/19/2014 1:46 PM
98	Scrap the forms. It's a waste of time and paper	8/19/2014 1:44 PM
99	No.	8/19/2014 1:43 PM

### Q8 Do you have any comments on the updated burden analysis contained in the draft ICR Renewal?

Answered: 69 Skipped: 89

#	Responses	Date
1	no	9/5/2014 10:31 AM
2	How in the world can anybody run a small business and be successful, if we have to absorb all the specious information government agencies put out.	9/5/2014 10:23 AM
3	No.	9/5/2014 10:19 AM
4	I have not seen it.	9/5/2014 10:17 AM
5	No	9/5/2014 10:15 AM
6	Not familiar with this action. I am certain it is a waste of time and money as it comes from the government. Has Lois found her emails yet?	8/26/2014 5:32 PM
7	No	8/25/2014 9:01 PM
8	?	8/24/2014 10:19 PM
9	Yes, We should be allowed to produce the pamphlet and disclosure forms and allow for electronic signature.	8/24/2014 1:14 PM
10	The first time I've seen something like this on the 20 years I've been in the property management business. Reach out more often	8/22/2014 6:43 PM
11	?	8/21/2014 6:01 PM
12	ICR renewal is what exactly?	8/21/2014 1:56 PM
13	Don't change a program that is working	8/21/2014 8:27 AM
14	I haven't seen it	8/21/2014 12:51 AM
15	No	8/20/2014 3:56 PM
16	??? NO clue what you are talking about, which may mean there is a problem with disseminating this information.	8/20/2014 10:46 AM
17	No.	8/20/2014 6:54 AM
18	No.	8/19/2014 10:54 PM
19	I have used all disclosures needed for a sale with the sale of time in a home with a lease	8/19/2014 10:46 PM
20	No	8/19/2014 9:52 PM
21	have not seen it	8/19/2014 9:18 PM
22	No	8/19/2014 8:38 PM
23	Don't know anything about a draft ICR Renewal...	8/19/2014 8:21 PM
24	no	8/19/2014 7:27 PM
25	Not aware of.	8/19/2014 6:18 PM
26	no	8/19/2014 6:18 PM
27	unaware of this?	8/19/2014 6:09 PM
28	It seems the EPA is trying to make their budget by assessing large fines against small landlords and management companies. A good government would not look for ways to punish good citizens because of a small over sight or typographical error.	8/19/2014 5:58 PM

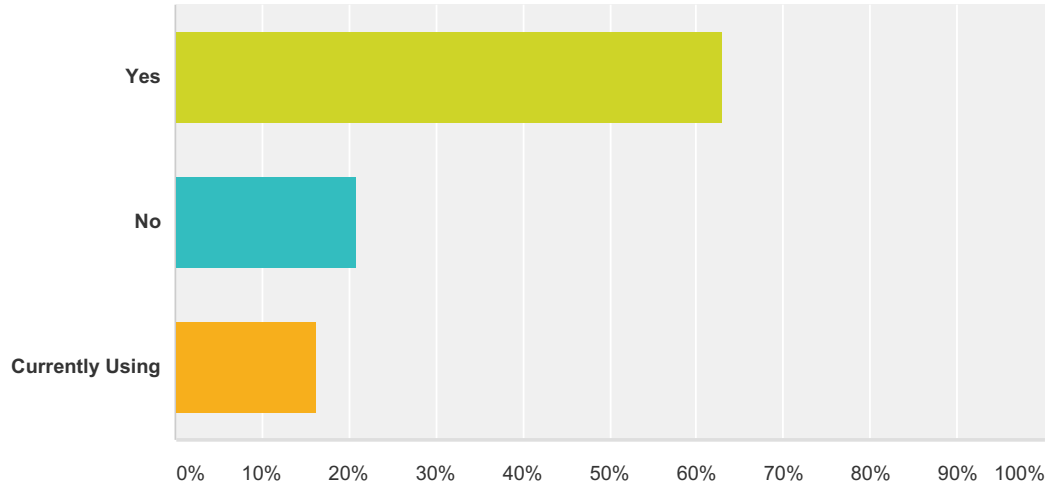
29	not aware of what this means	8/19/2014 5:17 PM
30	We have never had a tenant even look at the document	8/19/2014 5:13 PM
31	no	8/19/2014 4:36 PM
32	no	8/19/2014 4:35 PM
33	none	8/19/2014 3:59 PM
34	I don't understand this question.	8/19/2014 3:55 PM
35	no	8/19/2014 3:51 PM
36	no	8/19/2014 3:42 PM
37	NA	8/19/2014 3:38 PM
38	What is ICR?	8/19/2014 3:19 PM
39	Unfamiliar with it, but if the government designed it, it is most likely a waste of time.	8/19/2014 3:15 PM
40	Not sure what you are referring to	8/19/2014 3:05 PM
41	I am not aware of a draft ICR Renewal	8/19/2014 3:02 PM
42	needs to be done away with all together. Too much bureaucracy that is hurting our industry	8/19/2014 2:58 PM
43	no	8/19/2014 2:51 PM
44	not sure what that is?	8/19/2014 2:48 PM
45	No	8/19/2014 2:40 PM
46	What?	8/19/2014 2:38 PM
47	na	8/19/2014 2:38 PM
48	no	8/19/2014 2:34 PM
49	I am not aware of any additional burden	8/19/2014 2:32 PM
50	no	8/19/2014 2:26 PM
51	I no longer take on management of homes built before 1978	8/19/2014 2:20 PM
52	none	8/19/2014 2:15 PM
53	No	8/19/2014 2:12 PM
54	No idea what this means.	8/19/2014 2:09 PM
55	do not know how this relates to us. I looked it up on the internet but something from 1999 popped up and it appeared it related to government agencies so am unclear about this topic.	8/19/2014 2:07 PM
56	not familiar with this	8/19/2014 2:05 PM
57	Don't know what "draft ICR Renewal" is. Can't answer question.	8/19/2014 2:05 PM
58	no	8/19/2014 2:04 PM
59	Don't know what you are referring to.	8/19/2014 2:03 PM
60	no once again its political nonsense.	8/19/2014 2:01 PM
61	NO	8/19/2014 1:53 PM
62	Not aware of this.	8/19/2014 1:50 PM
63	Not at this Point	8/19/2014 1:50 PM
64	No	8/19/2014 1:50 PM
65	What is it?	8/19/2014 1:48 PM



66	No	8/19/2014 1:47 PM
67	Have not seen it	8/19/2014 1:46 PM
68	What is this? Is there a change coming?	8/19/2014 1:45 PM
69	No.	8/19/2014 1:43 PM

### Q9 Are you interested in using, or are you currently utilizing, electronic reporting/record keeping options?

Answered: 154 Skipped: 4



Answer Choices	Responses
Yes	62.99% 97
No	20.78% 32
Currently Using	16.23% 25
<b>Total</b>	<b>154</b>

## Q10 Do you have any other suggestions or comments on reporting and record-keeping requirements?

Answered: 61 Skipped: 97

#	Responses	Date
1	no	9/5/2014 10:31 AM
2	No.	9/5/2014 10:19 AM
3	No. We keep the info in our Rent Manager property documentation	9/5/2014 10:15 AM
4	Why report, just fix. Too much money goes to government which does NOTHING but waste. Follow your leader and play golf and do nothing.	8/26/2014 5:32 PM
5	No	8/24/2014 10:19 PM
6	Yes, We should be allowed to produce the pamphlet and disclosure forms and allow for electronic signature.	8/24/2014 1:14 PM
7	The document is so long that tenants don't read it	8/22/2014 6:43 PM
8	NO	8/21/2014 1:56 PM
9	keep it to a minimum	8/21/2014 8:27 AM
10	No	8/21/2014 12:51 AM
11	New Mexico requires longer record keeping than the EPA 3 years so there is not an extra burden.	8/20/2014 3:56 PM
12	Virginia DPOR allows for record keeping to be electronic. Would be nice if EPA allowed for electronic delivery and record keeping	8/20/2014 11:55 AM
13	Implement them now	8/20/2014 10:42 AM
14	No.	8/20/2014 6:54 AM
15	Make is easier to comply with the requirements using electronic means.	8/19/2014 10:54 PM
16	We have all disclosures sign by new tenant and give them the book	8/19/2014 10:46 PM
17	No	8/19/2014 9:52 PM
18	If the forms can be filed with the leases, then it is no extra burden.	8/19/2014 9:18 PM
19	No	8/19/2014 8:38 PM
20	none	8/19/2014 8:21 PM
21	no	8/19/2014 7:27 PM
22	I think this is an unnecessary expense.	8/19/2014 6:35 PM
23	We are paperless. we scan our documents	8/19/2014 6:18 PM
24	Eliminate the paper pamphlet requirement.	8/19/2014 5:31 PM
25	no	8/19/2014 4:36 PM
26	no	8/19/2014 4:35 PM
27	no	8/19/2014 4:26 PM
28	none	8/19/2014 3:59 PM
29	no	8/19/2014 3:51 PM

30	No. If a tenant sues, you need to produce a copy of the disclosure. If you don't have it, you get fined. Keep it simple.	8/19/2014 3:27 PM
31	No	8/19/2014 3:05 PM
32	No	8/19/2014 3:02 PM
33	too burdensome and unnecessary. insane implementation by local environmental agencies that didn't even know what the RRP law was and it was stated in her report	8/19/2014 2:58 PM
34	no	8/19/2014 2:51 PM
35	no	8/19/2014 2:50 PM
36	no more formal record keeping just do a disclosure.	8/19/2014 2:48 PM
37	No	8/19/2014 2:40 PM
38	There should be no need to give the booklet again when work needs to be done. If you have an acknowledgement that it was given to them when they moved in.	8/19/2014 2:38 PM
39	i like sky slope	8/19/2014 2:38 PM
40	only require electronic copies to be kept.	8/19/2014 2:36 PM
41	Not at this time	8/19/2014 2:32 PM
42	No	8/19/2014 2:28 PM
43	no	8/19/2014 2:26 PM
44	Maybe it's time to see if we can stop using the disclosure.	8/19/2014 2:20 PM
45	no	8/19/2014 2:20 PM
46	No	8/19/2014 2:12 PM
47	Maybe a simple, well written, non-government-ease one page press email alert message sent to NARPM and real estate boards and companies would help.	8/19/2014 2:09 PM
48	The least time-consuming and paper retention requirements as possible. What used to be a few pages has turned into 22 to 50 pages depending on the type of agreement and buyers and sellers are really turned off by that volume of documents. We keep everything in the appropriate files in our office, scan and save on our server, and store older files with paper documents in our off-site facility so not sure what this refers to,	8/19/2014 2:07 PM
49	None	8/19/2014 2:05 PM
50	no	8/19/2014 2:04 PM
51	Get rid of it, tenants never read it anyway and a huge waste of government money	8/19/2014 2:02 PM
52	no once again its political nonsense.	8/19/2014 2:01 PM
53	No	8/19/2014 2:00 PM
54	no	8/19/2014 1:53 PM
55	A national database would be nice. We could input the address and print a history of records. Something where you could look up the address, and where registered users could scan and attach their records as needed. PDF could then be generated of the records and provided the the new tenants	8/19/2014 1:51 PM
56	Not aware	8/19/2014 1:50 PM
57	No	8/19/2014 1:50 PM
58	No	8/19/2014 1:50 PM
59	No	8/19/2014 1:47 PM
60	Are there new requirements?	8/19/2014 1:45 PM
61	No.	8/19/2014 1:43 PM

## Q11 Do you have any other comments or suggestions about the regulation in general?

Answered: 72 Skipped: 86

#	Responses	Date
1	Again, Apply this ruling ONLY TO MULTI-FAMILY HOUSING, not single family housing.	9/5/2014 10:19 AM
2	It's not necessary, especially the requirement that only certified painting contractors can work on the property when it's OK for the owner to. Why can't that also include certified property managers overseeing the work?	9/5/2014 10:15 AM
3	Too much from those with too little.	8/26/2014 5:32 PM
4	If it must be enforced, why not enforce it for the owner occupants also, instead of just rental properties? Just as many children can be affected in them.	8/25/2014 6:06 PM
5	No, but the RRP program I would have comments	8/24/2014 10:19 PM
6	EPA should provide a powerpoint or other training program for instructors to present.	8/24/2014 1:14 PM
7	Update the form and streamline it. It would also be great if it was in electronic format	8/22/2014 6:43 PM
8	It's stupid. In all of the years that we have been required to comply, and with all the money spent on forms, pamphlets, employe education, etc. NOT ONE PERSON HAS EVER NOT RENTED A UNIT BECAUSE OF LBP!	8/22/2014 11:17 AM
9	complicated to understand who and what to do / use when it comes time to use vendors for for the older properties	8/21/2014 6:01 PM
10	Clarity as to where specifically on the LBP form does a landlord/owner need to INITIAL. Everyone wants to put an X. Also, there should be a space on the form that allows you to input an address of the property in question.	8/21/2014 1:56 PM
11	Please reduce regulations instead of increasing them.	8/21/2014 8:27 AM
12	No	8/21/2014 12:51 AM
13	The number of forms is the most prohibitive as well as printing the pamphlet. Most home owners who are selling have no idea of any lead based paint so I do not feel that it prevents much, but at least it makes the buyer aware.	8/20/2014 3:56 PM
14	I understand the importance and reasoning behind the necessity, but the penalty if I or one of my agents makes a mistake is far too severe.	8/20/2014 10:12 AM
15	No.	8/20/2014 6:54 AM
16	IT is often difficult to find the age of a house - there should be a requirement that a local agency or the assessors office should make this a requirement to enter. I wish these were forms that we could acquire from a local office to hand out to tenants	8/19/2014 11:18 PM
17	None	8/19/2014 10:46 PM
18	No	8/19/2014 9:52 PM
19	Pamphlet is way out of date. Lead paint and the effects of lead are present in MANY instances beyond housing. The awareness should be universal, not limited to moving into certain properties. The older properties are stigmatized and bear a huge financial burden to meet requirements. With lead present in some children's toys, certain food and food containers, cosmetics, etc., it is not fair to target and assign blame upon the housing solely.	8/19/2014 9:18 PM
20	No	8/19/2014 8:38 PM
21	none	8/19/2014 8:21 PM
22	no	8/19/2014 7:27 PM
23	in my opinion the requirements are cumbersome, especially because in the hundreds of homes I have sold, bought, or lease, there has only been one instance in which the owner had information about the presence of lead-based paint.	8/19/2014 6:35 PM

24	no	8/19/2014 6:18 PM
25	Eliminate the paper pamphlet requirement. Use electronic only.	8/19/2014 5:31 PM
26	Not necessary based on the impact it has	8/19/2014 5:13 PM
27	It seems like in the last 40 years most homes have been tagged with lead or not and it's kind of a very outdated issue and most people are already aware it could be present in older homes.	8/19/2014 4:36 PM
28	Do not manage any targeted properties.	8/19/2014 4:35 PM
29	no	8/19/2014 4:26 PM
30	none	8/19/2014 3:59 PM
31	no	8/19/2014 3:51 PM
32	Cancel it! no one eats the paint!	8/19/2014 3:41 PM
33	Not really other than making others accountable for proper reporting of their property(ies) and vendor's for their certifications rather than making the landlord responsible for it all. We may not be technically responsible for their actions but if something is not to the letter of your law, we are inevitably held responsible for being educated and for educating our clients and vendors.	8/19/2014 3:38 PM
34	Penalties are significant and often time incurred due to not fully understanding rules vs. negligent or purposeful actions.	8/19/2014 3:31 PM
35	Standardize disclosure nationwide. This has been in place for decades. It makes me think if cigiretts; do we really need disclosures informing folks it is dangerous? That should be common knowledge now. Same with paint; everyone should know to not eat paint chips and to complain if you have paint damage, regardless of where you live or the age of the property.	8/19/2014 3:27 PM
36	Heavier regulations place a burden that is unfairly harsh on smaller operations, resulting in lower efficiencies and greater overhead costs.	8/19/2014 3:15 PM
37	prospective tenants are provided with so much disclosures and required info that the tenants are on information overload. They receive federal and state lead disclosures, HOA rules & regs. state lease disclosures, local lease disclosures, security deposit disclosures, dangerous dog disclosures and other required information As a result the tenants don't read any of it.	8/19/2014 3:09 PM
38	No	8/19/2014 3:05 PM
39	I think that the EPA has done enough with Lead Based Paint. Further regulations beyond what exists further penalizes the property owner and increases the costs of housing to the current and future residents.	8/19/2014 3:02 PM
40	just did, too burdensome and puts the responsibility on wrong party	8/19/2014 2:58 PM
41	Tenants unknowingly bring lead based products into the property and these products leech lead into the counter top. This make the owner liable for lead based exposure that the owner was not aware. For tenant occupied properties lead based disclosure and distribution of the lead based pamphlet should be required to protect the owner.	8/19/2014 2:56 PM
42	go back to the way it use to be so owners can maintain their properties	8/19/2014 2:51 PM
43	The requirements for remodeling related to lead based paint etc are burdensome and unreasonable and not realistic or attainable by contractors in general. They serve to make the price of rental property, particularly low end older properties higher or they are removed from the market.	8/19/2014 2:50 PM
44	Get rid of it!	8/19/2014 2:48 PM
45	na	8/19/2014 2:38 PM
46	Not at this time	8/19/2014 2:32 PM
47	No	8/19/2014 2:28 PM
48	no	8/19/2014 2:26 PM
49	Maybe it's time to see if we can stop using the disclosure. Is it still really an issue? I have been doing this for 16 years and have yet to hear of case. The disclosure doesn't change anything anyway. It another form the tenant glances over. It doesn't prevent anyone from renting nor change and of their habits. If there is an issue, the tenant could still sue anyway so I do not see the purpose of the disclosure.	8/19/2014 2:20 PM

50	No.	8/19/2014 2:20 PM
51	The burden government state, local and federal is out of control and compliance at 100% perfection is impossible with every action a threat to our livleyhood by the governments judged by government workers who seem never to have their actual jobs at risk.	8/19/2014 2:15 PM
52	Great example of too much regulation. To require that a property manager serve notice to a tenant when a repair is to be done, when the property manager receives no revenue for the repair, is not fair. Why not require the contractor to keep the records, they could then add the admin costs to the repair I think this survey is all about making sure property managers are aware of the law.	8/19/2014 2:14 PM
53	Why the discussion of diet and other child rearing suggestions included in the Lead Based Paint pamphlet??? The pamphlet goes off course, and costs property managers money because we're bearing the cost of their pamphlet reproduction.	8/19/2014 2:12 PM
54	See number 8 above.	8/19/2014 2:09 PM
55	electronic delivery: While I personally understand the problems and dangers with lead based problems, I will say that Buyers and Tenants have almost no interest in this information, sign the documents, and I think based on the reaction we receive few if any buyers or tenants actually read the handbook and most have no interest - sadly - in the information. I think that instead of "killing a tree" with all these brochures being given out every day across the country, that giving them a "link" to go to the booklet would be a better way to deliver the information between computers, tablets and smart phones. Younger people all want to do things electronically - they do not want "piles" of paper anymore. From our observation, there is very little interest in receiving the booklet - we put everything in a packet for them before they leave and have a check list showing that they received all the documents forms brochures etc. they are part of the leasing process. If you had a camera in the homes of people who receive this booklet I would bet you would see thousands of these booklets tossed into the recycle bins and sent to recycle landfills across the nation.	8/19/2014 2:07 PM
56	This is just one of many burdens placed bay regulations. One such requirement adds little to overall weight and time of rental process and agent responsibility. But one by one, additional regulations will overwhelm and make process very cumbersome and filled with potential for accidental omission and increased opportunity for inefficiency and liability.	8/19/2014 2:05 PM
57	I think its a waste of time and money.	8/19/2014 2:04 PM
58	Get rid of it, tenants never read it anyway and a huge waste of government money	8/19/2014 2:02 PM
59	no once again its political nonsense.	8/19/2014 2:01 PM
60	I think there are far greater home hazards that probably deserve a greater or at least equal concern that are not even being discussed. Such a toxicity of pesticides and herbicides; VOC outgassing of building materials; herbicides, pesticides, growth hormones, and preservatives in FDA approved food products. Also of concern is the questionable treatment of public water. All of these are probably of a greater health impact than lead-based paint.	8/19/2014 2:00 PM
61	Please do away with it. It protects nobody and consumers do not care about their family when they need a place to live. If a parent cannot monitor a child eating paint chips in a home they shoudn't be parents.	8/19/2014 1:56 PM
62	On newer properties waive the disclosure	8/19/2014 1:53 PM
63	We find that very few if anyone, actually read the information provided. The biggest expense is for our owners who do not understand the importance of maintaining, repainting, and touching up any paint surfaces that might be damaged.	8/19/2014 1:52 PM
64	I get the concept and find value in it. But we are only as good as our own personal records. I have to rely on my staff to maintain our records. I would like something centralized where the contractors doing work and testing are uploading information to the same database that my employees have access to.	8/19/2014 1:51 PM
65	No	8/19/2014 1:50 PM
66	Not at this time	8/19/2014 1:50 PM
67	lead paint free certification for repairs would be a great class to present to managers. Testing a house before making repairs how to prep areas, who can do work or not and the cost of the fines related if regs not followed.	8/19/2014 1:50 PM
68	This is one of those laws that seems grossly out dated. More than 90% of my rentals were built long after this law. And for the homes that were built in the 70s and before, they've been renovated so many times, I can't think of a single issue arising from lead poisoning.	8/19/2014 1:50 PM

69	No	8/19/2014 1:47 PM
70	too much regulation in general. we'll all be worn out and out of business soon!	8/19/2014 1:46 PM
71	See above	8/19/2014 1:45 PM
72	No.	8/19/2014 1:43 PM