

Attachment A: Consultation Summary**Stakeholder Engagement**

My name is John Wilkins, an Environmental Protection Specialist of the Office of Pollution Prevention and Toxics/Existing Chemicals and Risk Management Branch 2 at the Environmental Protection Agency (EPA). I am writing to you today to request your assistance on an Information Collection Request (ICR). For the past few months, EPA has been updating the ICR for the information collection related to the regulation set forth in 40 CFR 745, Subpart F and 24 CFR 35, Subpart A titled "Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards Upon Sale or Lease of Residential Property." More information is found in the Federal Register notice titled "Agency Information Collection Activities; Proposed Renewal Collection and Request for Comment; Residential Lead-Based Paint Hazards Disclosure Requirements" <https://www.federalregister.gov/d/2025-21199>. As part of our consultation process, we are requesting comments from industry on this ICR renewal proposal.

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.

During this information collection request (ICR) renewal for this regulation EPA is revising the seller's and lessor's disclosure of information sample forms to provide greater clarity on how to fill out the forms under 40 CFR 745, Subpart F and 24 CFR 35, Subpart A. EPA appreciates comments regarding these clarifying revisions to these sample forms, available via [regulations.gov](https://www.regulations.gov) in the docket

The questionnaire should only take about 15 minutes and your response is voluntary. Should you choose to respond, we ask that you do not submit any sensitive, confidential business information or business phone numbers as part of your response. For your convenience, an ICR supporting statement, and an ICR questionnaire is attached.

You may complete the ICR questionnaire and submit the completed questionnaire to the EPA Docket EPA-HQ-OPP/OPPT-2017-0631 at <https://www.regulations.gov/document/EPA-HQ-OPPT-2017-0631-0024> or to me directly, by 01/26/2026.

We greatly appreciate your time and participation.

Lead-Based Paint Disclosure Regulation ICR Renewal Questionnaire

Frequency of Collection

- 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 acknowledge 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 acknowledgement forms/receipts, and lead related certifications?
- 5) 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?

- a) If so, what is the financial burden to you?
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- 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?
 - 9) Do you have any comments on the revised sample seller and lessor disclosure forms?
 - a) Do you use them? Are they clear, logical, and easy to complete?

Burden and Costs

- 1) Are the labor rates accurate?
- 2) Bearing in mind that the labor and cost estimates include only burden hours and costs associated with the paperwork involved with this ICR, *e.g.*, the ICR does not include estimated burden hours and costs for conducting studies, are the estimated burden hours and labor rates accurate? If you provide burden and cost estimates that are substantially different from EPA's, please provide an explanation of how you arrived at your estimates
- 3) Are there other costs that should be accounted for that may have been missed?