

Office of the General Counsel (Rules- Rental Registry)
Ohio Department of Health (ODH)
246 N. High Street
Columbus, Ohio 43215

September 28, 2018

ODHrules@ODH.ohio.gov

RE: Lead Safe Rental Registry – Comments on Proposed Rules OAC Chapter 3701-81

To the Office of General Counsel:

Thank you for the opportunity to provide comment on the important issue of lead-safe rental housing registry rules. The Schubert Center for Child Studies at Case Western Reserve University bridges research, education, policy and practice for the well-being of children and adolescents. As noted in our June 22, 2018 letter regarding the first set of proposed rules for a lead-safe rental registry, because children are especially vulnerable to the effects of lead toxicity and can suffer serious immediate harm and profound life-long damage, our Center has an interest in reducing childhood exposure to lead and supporting public policies that advance best practices for children and families.

First, we want to commend the Ohio Department of Health’s (ODH) for revising the lead-safe registry rule, in defining “post maintenance dust sampling”, to require a “clearance examination” as the only acceptable method for assessing lead hazards. Ensuring

