

Elizabeth Mendenhall  
2018 President

Bob Goldberg  
Chief Executive Officer

**ADVOCACY GROUP**  
William E. Malkasian  
Chief Advocacy Officer/Senior Vice President

Jerry Giovaniello  
Chief Lobbyist

500 New Jersey Ave., NW  
Washington, DC 20001-2020  
Ph. 202-383-1194  
WWW.NAR.REALTOR

February 20, 2018

Ms. Charlotte Bertrand  
Acting Principal Deputy Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
Environmental Protection Agency  
Washington, DC 20476

*Submitted electronically via: <http://www.regulations.gov>*

RE: EPA-HQ-OPPT-2017-0631

Dear Ms. Bertrand:

On behalf of the 1.3 million members of the National Association of REALTORS® (NAR), I respectfully submit these comments to the Information Collection Request (ICR) Notice submitted by the Environmental Protection Agency (EPA), Fed. Reg. 2017-27424.

The purpose of this ICR is to collect data on the collection burden for the Lead-Paint Disclosure regulation and, in particular, seeking comments from very small businesses (25 employees or less) on what efforts the EPA could take to reduce their regulatory burden under this rule.

To address these issues, in January of 2018 NAR emailed roughly 50,000 REALTORS® through a third party survey firm to ascertain their experiences with the regulatory burden of this rule. More than 3,500 responses from REALTORS® shaped the survey results. While these results are informative, they may be conservative as the housing market has been a sellers' market for more than five years. This imbalance undermines buyers' leverage with respect to inspections and potentially to fully evaluate or to appreciate potential hazards.

While survey respondents felt that the costs of compliance were minimal, they did stress the value and need for additional training about the law, regulation and compliance requirements. Forty percent of respondents answered in the affirmative when asked "Did you need training and preparation for you and your staff to understand your responsibilities and the actions which must occur before any sale or lease of target housing?" We would recommend that the EPA consider providing additional training opportunities and resources to the real estate community to respond to this need.

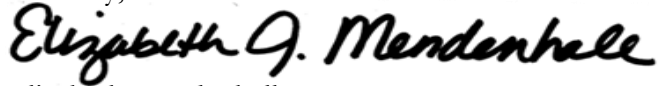
Another conclusion of the survey was the value that respondents place on the ability to provide this information through electronic reporting and recordkeeping means. NAR would encourage EPA to continue to innovate in this regard and develop compliance methods that can be completed in a digital or electronic format.



From an anecdotal perspective, many respondents commented on the belief that this rule is somewhat antiquated and out-of-date. This belief is based on the fact that most of their potential buyers do not ask to test for lead paint and that most of the housing in their market areas were built after 1978.

Thank you for your consideration of these comments – NAR appreciates the opportunity and looks forward to working with the EPA on the new lead paint initiative to develop a federal strategy to reduce childhood lead exposure and eliminate associated health impacts.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth G. Mendenhall". The signature is written in a cursive, flowing style.

Elizabeth Mendenhall

2018 President, National Association of REALTORS®