



# Compliance Interventions on the Behaviors of Third Party Lead Contractors

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November 8, 2018

# EPIC works with environmental program managers to develop evidence-based programs



**Paul Ferraro**

Director

Bloomberg Distinguished  
Professor



**Ben Meiselman**

Postdoctoral Research Fellow

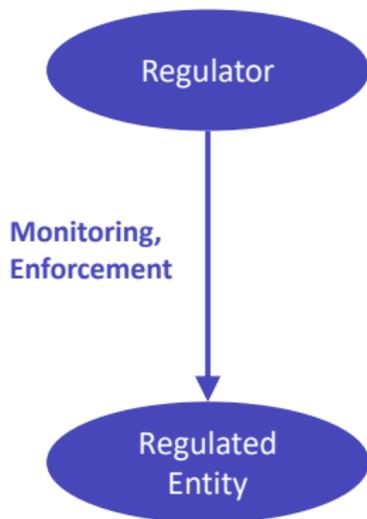
# We believe a “test, learn, adapt” strategy will lead to better environmental outcomes at lower costs

We have found the following conditions are favorable:

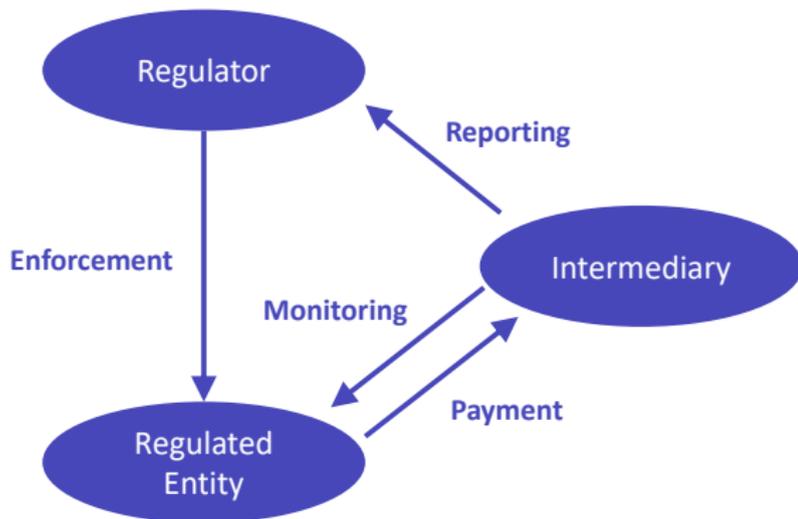
- 1 Exposure control
- 2 Sample size
- 3 Observable outcomes
- 4 Elucidate how and why
- 5 Catalyst for broader innovation

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Notification

Inspection

Certificate

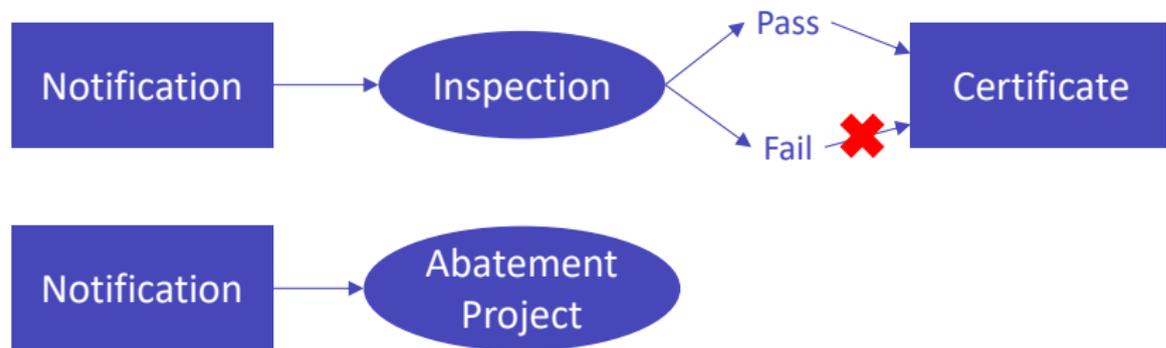
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# Contractors frequently fail to submit notifications and certificates

## Notifications

- MDE receives approximately 5,000 notifications per quarter
- We estimate 15,000 are required (67% noncompliance rate)

## Certificates

- MDE receives approximately 10,200 certificates per quarter
- We estimate 10,800 are required (5% noncompliance rate)

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Treatment

Message in prominent box

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General  
deterrence

In 2017, the Lead Poisoning Prevention Program assessed \$2.3 million in penalties for lead violations, and it obtained an administrative order of \$100,000 against a single lead contractor with multiple violations.

# Letters made penalties salient

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General  
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In 2017, the Lead Poisoning Prevention Program assessed \$2.3 million in penalties for lead violations, and it obtained an administrative order of \$100,000 against a single lead contractor with multiple violations.

Statutory  
penalty

Failure to notify the Maryland Department of the Environment at least 24 hours before a lead inspection is a misdemeanor punishable by a fine of up to \$25,000 and up to 2 years in prison.



September 5, 2018

FIRSTNAME LASTNAME  
LEAD CONTRACTOR, LLC  
1234 MAIN STREET  
BALTIMORE, MD 21201

RE: LEAD INSPECTION NOTIFICATIONS

Dear Firstname Lastname:

To protect the health and well-being of Marylanders, the Maryland Department of the Environment is reminding lead inspection contractors of obligations under the Code of Maryland Regulations (COMAR) 26.16.01–26.16.06.

COMAR 26.16.05.04 requires lead inspection contractors to notify the Department at least 24 hours before a lead inspection. Complying with this requirement is straightforward.

1. Download the lead inspection notification form at [www.mde.maryland.gov/lead/InspectionNotification](http://www.mde.maryland.gov/lead/InspectionNotification) or request a form by calling (410) 537-3825.
2. Complete the form electronically or by hand.
3. Email the form to the Lead Poisoning Prevention Program at [mde.hopp@mde.maryland.gov](mailto:mde.hopp@mde.maryland.gov) with "inspection notice" in the subject line, or fax the form to (410) 537-3156.

In 2017, the Lead Poisoning Prevention Program assessed \$2.3 million in penalties for lead violations, and it obtained an administrative order of \$100,000 against a single lead contractor with multiple violations.

The penalties for failing to notify the Department before a lead inspection are described in the Annotated Code of Maryland, Environment Article, §6-422 and §7-266.

If you have already been complying with this requirement, we thank you.

If you have any questions, please contact us at (410) 537-3825 or visit the Lead Poisoning Prevention Program website at [www.mde.maryland.gov/lead](http://www.mde.maryland.gov/lead).

Sincerely,

Michelle Armiger  
Division Chief, Lead Accreditation & Oversight



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Michelle Armiger  
Division Chief, Lead Accreditation & Oversight

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Message	Attention			Total
	0EM	1EM	3EM	
CO	98	98	97	293
GD	97	98	98	293
SP	97	96	97	290
Total	292	292	292	876

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- Catalyst for broader innovation
  - ▶ Scale up, refine with other populations

## Plan for next phase

Limited capacity to issue penalties

Randomly assign when violators are penalized

Measure effect of specific deterrence on behavior

# Thank you

[www.epic-evidence.org](http://www.epic-evidence.org)

**Paul Ferraro**

Director

[pferraro@jhu.edu](mailto:pferraro@jhu.edu)

**Ben Meiselman**

Presenter

[meiselman@jhu.edu](mailto:meiselman@jhu.edu)