

# Briefing on the FHFA Radon Policy for States and Industry

August 24, 2023



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## Welcome

### Goals of the webinar

- Provide an overview of the FHFA - Fannie Mae/Freddie Mac radon policy including its omissions
- Discuss managing the conflicts between the radon policy and standards/state statutory requirements
- Discuss next steps in the process

### Target Audiences

- Representatives from state/tribal radon programs
- Radon professionals

Presenters: Josh Kerber, Minnesota Radon Program  
Kim Steves, Technical Assistant, CRCPCD

Kyle Hoylman, President, AARST; KY Board of Radon Safety  
Jane Malone, National Policy Director, AARST



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AARST-418: Briefing on the FHFA / GSEs' Multifamily Radon Policy

Media: Live Webinar

RECORDED: Thursday, August 24, 2023

Earn 1 hour of NRPP Category I CE.

Presenters: Kim Steves, Josh Kerber, Kyle Hoylman, Jane Malone, Diane Swecker.

Objectives: Overview of the final 2023 FHFA/Fannie Mae/Freddie Mac multifamily radon policy and discussion of managing the conflicts between the policy and standards/credentialed requirements.

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## AGENDA

FHFA / GSEs Multifamily Radon Policy - Intro

FHFA / GSEs Multifamily Radon Policy - Review

- Exemptions
- Testing Requirements
- Mitigation and O+M Requirements

Ground Contact Testing

Policy Considerations in States

Strategies for State Radon Programs

Communications/Advocacy

- Reporting Form
- Lenders, FHFA Liability
- Questions / Discussion



# Intro: FHFA / GSEs' Multifamily Radon Policy



- Established by the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110–289, in response to the subprime mortgage crisis
- Responsible for the effective supervision, regulation, and housing mission oversight of Fannie Mae and Freddie Mac (the Government Sponsored Enterprises “GSEs”)
- Since 2008, FHFA has also served as conservator (receiver) of Fannie Mae and Freddie Mac
- FHFA mission: Ensure the regulated entities fulfill their mission by operating in a safe and sound manner to serve as a reliable source of liquidity and funding for the housing finance market throughout the economic cycle
- FHFA issued directive to the GSEs to develop multifamily radon policy in February 2021
- GSEs’ policy in effect for loan applications on or after 7/1/2023

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Mortgage  
Translations

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## FHFA INSIGHTS

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[Home / Media / Blog / FHFA Increases Radon Testing Requirements at Enterprise-Backed Multifamily Properties](#)

### FHFA Increases Radon Testing Requirements at Enterprise-Backed Multifamily Properties

Published: 1/19/2023

FHFA has adopted more robust radon testing requirements for multifamily properties backed by Fannie Mae and Freddie Mac (the Enterprises). This policy enhancement ensures that properties financed by the Enterprises continue to provide safe and sustainable housing for tenants across the United States. FHFA’s determination to reevaluate the Enterprises’ radon standards is based on a growing body of research that raises concerns about human exposure to naturally occurring radon gas.

#### Background

Radon is an invisible, odorless, and tasteless gas that comes from the breakdown of uranium inside the earth. Radon is a carcinogen, and extended exposure may be linked with an increased risk of lung cancer. Where present in soils, radon exposure can occur by breathing air entering buildings through cracks and gaps in walls and floors.

In 2021, FHFA directed the Enterprises’ multifamily divisions to review their radon assessment requirements to ensure the policies are data informed, fully understood by lenders and borrowers, and properly implemented and enforced. Through oversight of our regulated entities, FHFA’s mission is to responsibly foster a sustainable housing finance system that supports equitable access to affordable, decent, and safe homeownership and rental housing.

<https://www.fhfa.gov/Media/Blog/Pages/FHFA-Increases-Radon-Testing-Requirements-at-Enterprise-Backed-Multifamily-Properties.aspx>



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## Related Web Resources

**FHFA Press Release January 2023** “FHFA Announces Enhancements to Fannie Mae and Freddie Mac Radon Standards for Multifamily Properties”  
<https://www.fhfa.gov/Media/Blog/Pages/FHFA-Increases-Radon-Testing-Requirements-at-Enterprise-Backed-Multifamily-Properties.aspx>

### Freddie Mac:

“Exhibit 11 Radon Testing and Mitigation Standards”  
[https://mf.freddiemac.com/docs/exhibit\\_11\\_radon\\_testing\\_and\\_mitigation\\_standards.pdf](https://mf.freddiemac.com/docs/exhibit_11_radon_testing_and_mitigation_standards.pdf)

### Fannie Mae:

“Fannie Mae and Freddie Mac’s Joint Multifamily Radon Policy Frequently Asked Questions”  
 August 3, 2023  
<https://multifamily.fanniemae.com/media/document/pdf/multifamily-radon-policy-faqs>



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## FAQ #1. GSEs have aligned multifamily radon policy requirements

The Enterprises have made policy enhancements, including:

- Requiring that testing be increased from 10% of ground floor units to 25% with a minimum of one unit tested per building, subject to exemptions and deferrals for certain property types or loan products.
- Requiring an Environmental Professional (EP) to manage the radon testing process.
- Requiring the EP (or property representative) to provide tenant notifications prior to radon testing.
- Encouraging better radon data collection at multifamily properties across the United States, including collaboration with the Centers for Disease Control (CDC) on multifamily data standards and assessing the impact of the new testing standards.
- Providing improved guidance for lenders and environmental consultants on the Enterprises' radon standards.



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## FAQ #1. GSEs have aligned multifamily radon policy requirements

The Enterprises have made policy enhancements, including:

- Reminding lenders and EPs that the Enterprises require compliance with applicable radon laws and regulations.

The Enterprises and FHFA will continue to monitor the multifamily mortgage market and will reassess these radon requirements using available data and on-going feedback in consideration of the radon industry's ability to adapt to increasing radon testing on a nationwide scale, impacts on residents of Enterprise- financed properties, and the Enterprises' ability to serve our mission.

In 2025, FHFA and the Enterprises will reassess radon requirements after collecting better data on radon testing at Enterprise-backed properties.



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## Review of FHFA / GSEs' Multifamily Radon Policy



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## Policy Review – Fannie Mae/Freddie Mac (GSEs)

### Policy Exemptions:

- Properties with existing debt to GSEs that have undergone previous radon testing in compliance with the 2023 GSE policy
- Supplemental mortgages, cooperative, manufactured housing communities, properties secured by an SBL mortgage
- Properties with no ground-contact residential units
- Properties with property-wide mitigation systems in place operating under an existing radon Operation and Maintenance (O+M) plan
- Properties that, when newly constructed, incorporated radon-resistant design elements per the Enterprises' Guides
- Properties determined by Environmental Professional to not require testing and/or mitigation (documented reasons) – note: EPA radon map is not an acceptable reason for exemption



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## Policy Review – Fannie Mae/Freddie Mac (GSEs)

### Testing Requirements:

- Radon testing must be managed by an Environmental Professional (EP)
  - **[No radon professional credential or training required]**
- Notification of testing is required for staff/tenants and should include:
  - Guidance on maintaining building conditions for testing event
  - Device placement and retrieval dates
  - Information to obtain federal and/or state guidance on health risks
  - Contact information for the state radon program and responsible EP
- Initial testing must include at least 25% of all ground-contact units (GCU) at the property and no fewer than one test conducted per building containing GCUs at the property
  - No more than 15% invalid tests (e.g. lost or deficient) are permitted – EP determines sufficient valid results for characterization or additional testing required



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## Environmental Professionals

The GSEs' policy relies exclusively on Environmental Professionals (EPs), who are not inherently or actually qualified to perform or oversee radon testing and mitigation.

An EP is defined in the regulation for the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, the EPA Superfund Program) as "a person who possesses sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions, indicative of releases or threatened releases (see § 312.1(c)) on, at, in, or to a property;" (Radiation is specifically exempted from CERCLA)

The Indoor Radon Abatement Act (IRAA), the federal statute relevant to radon, directed EPA at 15 USC 2665 to operate a radon proficiency program. Today, states and EPA-recognized private radon certification programs carry out this function and implement Congressional intent regarding indoor radon. IRAA delivers the only nationwide framework for qualifications to perform radon services, not CERCLA.



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## Policy Review – Fannie Mae/Freddie Mac (GSEs)

### Testing Requirements (continued):

- **[No upper floor testing]**
- **[No protocol specified]**
- Follow up requirements in buildings containing a unit(s) with radon concentrations  $\geq 4.0$  pCi/L:
  - Conduct follow up radon testing in that building (short-term/long-term) – must include at least 25% of GCUs in building, including impacted unit(s) OR
  - Recommend mitigation of units in buildings with radon concentrations  $\geq 4.0$  pCi/L by EP
- All testing must be conducted in compliance with all applicable state and local laws and regulations
  - if a conflict exists between applicable laws/regulations and the GSEs policy, the more stringent requirement applies



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## Policy Review – Fannie Mae/Freddie Mac (GSEs)

### Mitigation Requirements:

- **FannieMae.** Radon mitigation is required: any unit with radon  $\geq 4.0$  pCi/L
    - **[Building-wide mitigation/clearance not required]**
  - **Freddie Mac.** Mitigation must be managed by a qualified mitigation professional
  - Post-mitigation testing must confirm radon concentrations  $< 4.0$  pCi/L in any unit on the mitigation plan
    - All mitigation must be conducted in compliance with all applicable state and local laws and regulations; if a conflict exists between applicable laws/regulations and the GSEs policy, the more stringent applies
- Operation and Maintenance (O+M) Program Requirements:
- Any required mitigation system must be managed under an O+M program that includes periodic inspections of all system components



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## Policy Review – EP Oversight

Can multifamily property owners conduct radon testing in lieu of an environmental professional (EP) or without oversight of an EP? What about in states that require licensing/certification of radon technicians but allow owners to test their own properties for radon without being licensed or certified?

Radon testing required as part of the due diligence for an Enterprise-backed loan must be overseen by an EP. The involvement of the EP may trigger state requirements for licensing and certification that require placement of devices be performed by a radon professional. In all cases, state and local laws and regulations for the qualifications of the radon testing professional must be met. (source: *Freddie Mac and Fannie Mae's Joint Multifamily Radon Policy FAQs – 6/28/2023*)



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## Ground Contact Unit Testing History, Research Results, Realities in the Field



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## Ground Contact Unit Radon Testing - History

- ANSI-AARST MAMF since 2013 : 100%
- HUD 2013-2020:  $\geq 25\%$ . since 2020: 100%
- Fannie Mae until 2023: one per building. now:  $\geq 25\%$
- Freddie Mac until 2023:  $\geq 10\%$ . now:  $\geq 25\%$



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## EARTH Study

### Evaluating and Assessing Radon Testing in Housing

NY State Department of Health / National Center for Healthy Housing/ AARST

Three-year study of radon levels in multifamily housing was conducted to determine whether 2017 federal radon-testing protocols were insufficient to effectively safeguard occupants.

The work that provided the basis for this study was supported by funding under cooperative agreement # NYHHU0038-17 from the U.S. Department of Housing and Urban Development's Office of Lead Hazard Control and Healthy Homes.



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## EARTH Study - Summary of Data

### Summary of Measurement Data

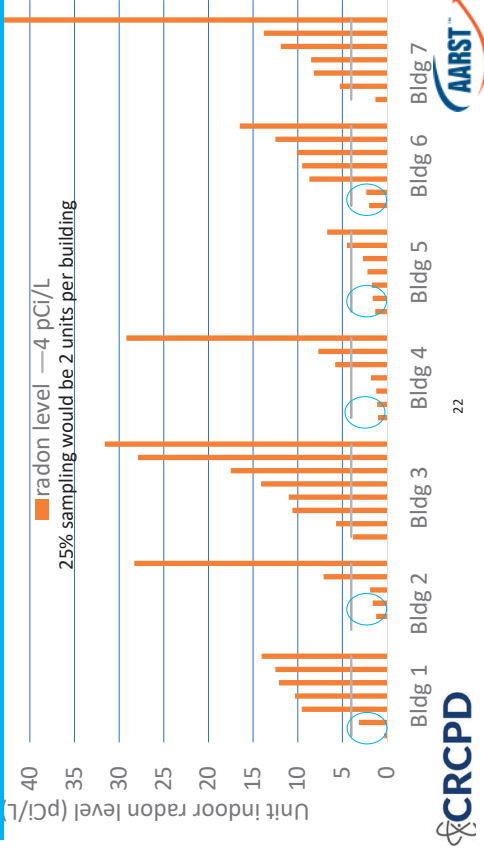
- 687 buildings containing 7892 residential units
- 85% of measured units had radon <4 pCi/L
- Equally measured across seasons (somewhat more in Spring)
- 93% of 687 buildings were 3 or fewer stories
- Arithmetic mean radon level was 2.36 pCi/L
- 1163 units had radon  $\geq 4$  pCi/L (~15%)
- 84% of measurements done 'above slab' ('slab on grade')



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## EARTH Study Example - Occurrence of Radon in Units of a 7-Building Complex



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### EARTH Study: Average probability of missing a unit in the building $\geq 4$ pCi/L Includes only buildings with at least one unit $\geq 4$ pCi/L

Number of ground contact units	Number of buildings	10% sampled	25% sampled	50% sampled	75% sampled	90% sampled
05-06	45	58	34	19	4.7	0.0
07-08	71	55	36	15	4.6	0.0
09-10	40	65	39	24	8.5	3.8
11-12	37	52	41	21	8.1	2.8
13-14	14	51	35	20	7.4	2.2
15-16	20	47	32	15	5.0	1.3
17-18	15	59	39	21	8.1	1.9
19-20	12	69	46	23	8.9	2.6
21-26	22	52	34	18	6.7	2.3
All	276	58%	38%	19%	6.5%	1.7%

Ground contact units only. Includes building with at least one unit  $\geq 4$  pCi/L.  
For 90% sampling, all units are tested in buildings with 9 or fewer units.



## EARTH Study - Conclusions

For all building sizes, 2-3% of units with radon  $\geq 4$  pCi/L would still not be identified when 90% of the units are measured, so a measurement frequency greater than 90% is needed.

Radon testing protocols in effect in 2017 for multifamily buildings (10% and 25% of ground contact units) are inadequate to identify units containing radon  $\geq 4$  pCi/L.

- 10% testing leaves a 58% risk of missing a unit with radon  $\geq 4$  pCi/L
- 25% testing leaves a 38% risk of missing a unit with radon  $\geq 4$  pCi/L
- 50% testing leaves a 19% risk of missing a unit with radon  $\geq 4$  pCi/L



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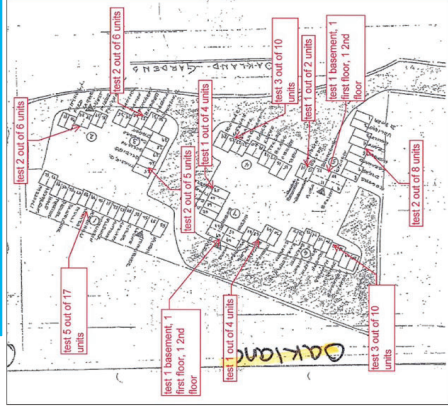
# Building Characterization



# Property Characterization

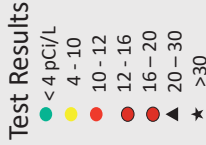
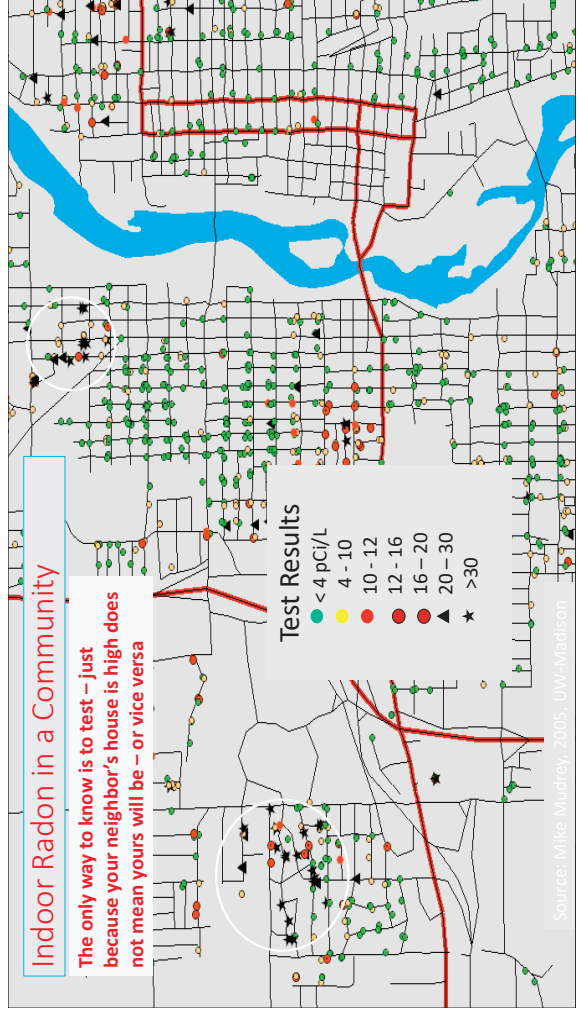
- Meriden, CT (7 buildings, 80 GC residential units)**
- 25 % Initial
    - 1: 2/5 units > EPA action level
    - 2: 1/2 units > EPA action level
    - 3: 4/4 units > EPA action level
    - 4: 0/3 units > EPA action level
    - 5: 0/7 units > EPA action level
    - 6: 1/3 units > EPA action level
    - 7: 1/5 units > EPA action level
  - 100% Follow Up
    - 1: 13 units > EPA action level
    - 2: 5 units > EPA action level
    - 3: 8 units > EPA action level
    - 4: 8 units > EPA action level
    - 5: 8 units > EPA action level
    - 6: 9 units > EPA action level
    - 7: 3 units > EPA action level

- 100% follow up characterization identified 16 residential units in 2 buildings < 4.0 pCi/L
- Total of 44 additional residential units identified through full characterization



## Indoor Radon in a Community

The only way to know is to test – just because your neighbor’s house is high does not mean yours will be – or vice versa



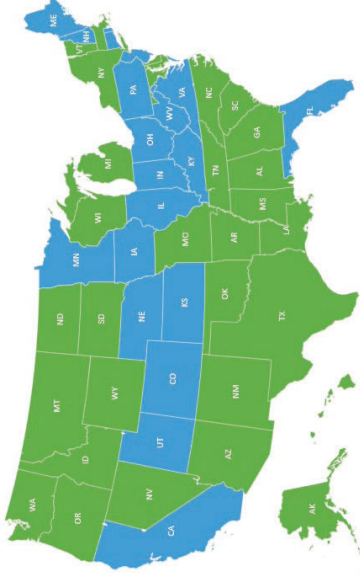
Source: Mike Mudrey, 2005, UW-Madison



# Policy Considerations Regulated States and Non-Regulated States

## Policy Considerations – Regulated and Unregulated States

■ No Credential ■ Credential



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## Policy Considerations – Regulated States

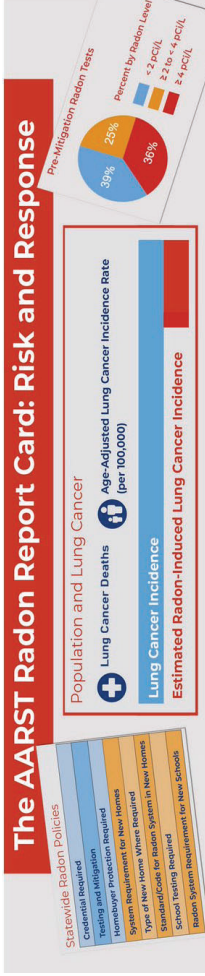
State	Required Credential(s)		Current Standard(s) in Effect	
	Private Certification	State License	ANSI-AARST	EPA, ASTM, other
California	X		All	
Colorado	X	X	All	
Connecticut	Mitigation	X	Mitigation	
Florida	X	X	Mitigation (rule pending)	All
Illinois		X	All	All
Indiana	X	X	All	
Iowa	X	X	Measurement (rule pending)	Mitigation
Kansas	X	X	All	All
Kentucky	X	X	All	
Maine		X	All	All
Minnesota		X	All	
Nebraska		X	Mitigation (rule pending)	All
New Hampshire	Mitigation		Mitigation	
New Jersey		X	All	
Ohio		X	All	All
Pennsylvania		X	Multifamily	Single Family
Rhode Island	X	X	All	
Utah	Mitigation	X	Mitigation	
Virginia	X		All	Single Family
West Virginia	X	X	All	

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## AARST State Radon Report Card

<https://aarst.org/report-card/>



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## Strategies for State Radon Programs



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## Strategies for Regulated States

- Issue regulatory notice clarifying state law prevails over GSE policy
  - Post on website
  - Forward to regulated community
  - Send to Housing Finance Agency, Insurance Commission, Real Estate Agents
  - Send to banker associations such as state affiliates of the [Mortgage Banker Association](#) and the [American Banker Association](#)
- Prepare to address questions, compliance, requests for clarification
- Move to enforce on reports of improper contracting and services
- Work with AARST chapter (or National where there's no chapter)
- Communicate with E-25 on assistance needs



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### Notification Template for States (1) GSE Policy Inquiries and State Authority

The [Agency Name] has received inquiries regarding the multifamily radon policy adopted by Fannie Mae and Freddie Mac, the Government Sponsored Enterprises (GSEs) overseen by the Federal Housing Finance Agency (FHFA) effective July 1, 2023. The GSEs' consolidated policy requires full compliance with all applicable state or local laws governing radon testing or mitigation, and further specifies that, in the event of any conflict between state or local laws and the policy, the lender must follow the more stringent requirements.

[Statute 123] established requirements for the control of radon in [State/Commonwealth], including but not limited to requirements for performing radon measurement, mitigation, and laboratory analysis.


Additional information regarding the radon statutes and regulations can be found at the [Agency Name] website: [www.xxx.gov] The [Agency Name] may also be contacted by phone at [ ] or by email at [ ].



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### Kentucky Statutory Requirements Notification July 11, 2023



**PUBLIC PROTECTION CABINET**  
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Kentucky State Capitol  
Frankfort, KY 40620  
P.O. Box 1300  
Frankfort, KY 40621  
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Ray A. Perry  
Governor  
Krisie E. Lunsford  
COMMISSIONER

Andy Beecher  
Secretary  
Alicia Williams Coleman  
LEIBTENANT GOVERNOR

**STATUTORY REQUIREMENTS NOTIFICATION – FHFA MULTIFAMILY RADON POLICY**

The Board of Radon Safety has received inquiries regarding the multifamily radon policy adopted by the GSEs (Fannie Mae / Freddie Mac) on July 1, 2023. The GSEs' consolidated policy requires full compliance with all applicable state or local laws governing radon testing or mitigation, and further specifies that, in the event of any conflict between state or local laws and the policy applies, the lender must follow the more stringent requirements.

Kentucky Revised Statutes (KRS) 309.430 through 309.454 establish requirements for the control of radon in the Commonwealth of Kentucky, including but not limited to requirements for performing radon measurement, mitigation, and laboratory analysis. In regard to the GSEs' multifamily radon policy, the following statutory requirements are applicable:

- Effective June 2019, radon contractors and business entities are required to be certified through either the National Radon Proficiency Program (NRPP) or the National Radon Safety Board (NRSB) to perform radon testing, mitigation, and laboratory analysis. The GSEs' multifamily radon policy and must be adhered to in order to comply with applicable state statutes and regulations.
- Effective June 2019, radon contractors and business entities are required to adopt and follow written standard operating procedures (SOPs) established by a development organization accredited by the American National Standards Institute (ANSI) for radon measurement, mitigation, or laboratory analysis. This requirement supersedes the requirements specified with the GSEs' multifamily radon policy and must be adhered to in order to comply with applicable state statutes and regulations.

Additional information regarding the radon statutes and regulations can be found at the Kentucky Board of Radon Safety website: [www.kbrs.org]. The Board may also be contacted by phone at 502-776-2742 or by email at radon@ky.gov.



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### Notification Template for States (2) - Law Supersedes GSEs' Policy

In regard to the GSEs' multifamily radon policy, the following statutory requirements apply:

- Effective [Month Date], radon professionals are required to be [certified through either the National Radon Proficiency Program (NRPP) or the National Radon Safety Board (NRSB)] and/or [Agency Name] to perform radon measurement, mitigation, or laboratory analysis. This requirement supersedes the requirements specified within the GSEs' multifamily radon policy and must be adhered to in order to comply with applicable state statutes and regulations.

- Effective [Month Date], radon contractors and business entities are required to adopt and follow written standard operating procedures (SOPs) established by [a development organization accredited by the American National Standards Institute (ANSI) for radon measurement, mitigation, or laboratory analysis] or [Agency Name]. This requirement supersedes the requirements specified with the GSEs' multifamily radon policy and must be adhered to in order to comply with applicable state statutes and regulations.



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## Strategies for Non-regulated States

- NRPP certified radon professionals may have to deal with a conflict between the standards they committed to follow and the demands of the lender/environmental consultant.
- CRCPD E-25 and AARST are available to provide guidance, support, and assistance if a state is interested in pursuing radon regulation.



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## Communications/Advocacy



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## ANSI-AARST Standards

- The AARST Consortium is an ANSI-accredited standards development organization consisting of stakeholders with direct and material interests in radon and vapor intrusion
- ANSI due process requirements include:
  - Openness
  - Consideration of views
  - Lack of dominance
  - Consensus vote
  - Balance
  - Appeals
- A standard shall not be designated as an American National Standard if it:
  - is contrary to the public interest
  - contains unfair provisions
  - is unsuitable for national use
- Responsible for development and ongoing maintenance of standards with minimum requirements for radon and soil gas measurement and mitigation



[standards.aarst.org](https://standards.aarst.org)



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## AARST Report Form for Improper Contracts

AARST is seeking reports on improper offers/contracts for radon services in multifamily buildings. "Improper" is defined as radon projects where the solicited/contracted scope of work is in violation of an applicable state law or regulation or radon standard, such as testing less than 100% ground-contact units. The purpose of this form is to allow radon professionals (and others) to report information about improper offers/contracts for multifamily radon measurement or mitigation work. The entity soliciting services may be a lender or a due diligence firm.



<https://tinyurl.com/RnReportMF>



**Who to Report?  
Lender  
or  
“Due Diligence” Firm  
that is offering a scope of  
work that does not meet  
state radon requirements**



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## Liability and Health Equity Considerations

What are the potential liability and health equity impacts on lenders, environmental consultants, and multifamily property owners choosing to meet only the minimum requirements of the GSEs multifamily radon policy?

- Disparate treatment of tenants who have no control over the building
- Tenants whose units were never tested and never mitigated exposed to radon
- Tenants whose units were never tested living in building with active mitigation system somewhere else
- Minimum GSE requirements deliver inferior services – no standards, no training – that don’t protect public health
- Post-mitigation testing only in tested units

## Next Steps

- To enforce their laws, regulated states need to be able to identify where the laws are being violated.
  - Radon professionals should communicate re improper bids to state radon program
- Reporting when a lender is hiring for a job that does not meet the state law requirements is critical. The goal is to target the lenders who are violating the law, not the radon professional.
- Ensure measurement and mitigation data for multifamily buildings is accurately reported to the state(s); compare data with map
  - FHFA/GSEs will review the radon data collected and use it to revisit the policy.
- Without strong radon laws and regulations, states cannot ensure their residents are adequately protected.
- Stay tuned.



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## Questions?

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Media Live Webinar

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Earn 1 hour of NABPP Category I CE.

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