

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date:	12/11/2024	
Media Program:	Toxic Substance Control Act	
Regulatory Program(s)	Section 1018 (Disclosure Rule) & Renovation Repair and Paint (RRP)	
Company Name:	Moses Tucker Partners	
Facility Name:	Offices	
Facility Physical Location:	200 River Market Ave., Suite 501	
(city, state, zip code)	Ft. Smith AR 72201	
Mailing address:	Same	
(city, state, zip code)		
County/Parish:		
Facility Phone Number	501.376.6555	
Facility Contact:	David Cole	CPA – Controller
	dcole@mosestucker.com	
FRS Number:	N/A	
Identification/Permit Number:	N/A	
Media Identifier Number:	N/A	
NAICS:		
SIC:		
Personnel participating in inspection:		
Angela Hays	EPA Region 6	Inspector
Stan Lancaster	EPA Region 6	Inspector
David Cole, CPA	Moses Tucker	Controller
Brandy Snyder	Moses Tucker	Director of Property Accounting and Human Resources
Jennifer Lester	Moses Tucker	Principal & COO
Alex Greene	Moses Tucker	Property Manager
EPA Lead Inspector Signature/Date	RALPH LANCASTER Digitally signed by RALPH LANCASTER Date: 2025.01.31 13:36:39 -06'00'	
	Stan Lancaster	Date
Supervisor Signature/Date	Stuckey, Troy Digitally signed by Stuckey, Troy Date: 2025.02.04 07:41:47 -06'00'	
	Troy Stuckey	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

The purpose of this inspection was to evaluate compliance with the lead-based paint (LBP) regulations of the Toxic Substances Control Act (TSCA). Moses Tucker Partners is subject to both Section 1018 (Disclosure Rule) and the Renovation Repair and Paint (RRP) rule of TSCA. The investigation of this facility was selected based on a complaint that was received from a citizen. The citizen alleged that Moses Tucker Partners failed to disclose the presence of lead their lease of a pre-1978 dwellings (target housing) and did not provide the EPA pamphlet upon signing of the lease. As a property management company, Tucker Moses is also subject to the RRP rule thus the inspection will also look at their maintenance and renovation activities as it pertains to the RRP Rule.

FACILITY DESCRIPTION

Tucker Moses offices is located at 200 River Market Avenue, Suite 500 in Little Rock, Arkansas. The inspection took place at this location and not include any site visits to their properties. Tucker Moses manages several properties in Little Rock, five (5) of which were in buildings that have original build dates prior to 1978. These five (5) properties were identified during the inspection and were the focus of our discussions. According to Moses Tucker staff, these buildings had been remodeled prior the initial occupancy of tenants and no pre-1978 properties have received renovations or other work that would trigger the requirements of the RRP in the past 5 years.

Section II – OBSERVATIONS

On 12/10/2024 EPA inspectors Stan Lancaster and Angela Hays arrived at the Moses Tucker Partners offices located on River Market Avenue to conduct an inspection. At this time, Alex Greene met with the inspectors. The inspectors presented their credentials, and the purpose of our visit was explained. Mr. Greene asked the inspectors if they could return on the following morning to conduct the inspection in order to have time to gather the appropriate individuals to better address our concerns. The inspectors agreed to return the next morning.

On 12/11/2024 at approximately 9:00 AM, EPA inspectors again visited the Moses Tucker Partners offices where they were met by Mr. Greene, Property Manager; David Cole, Controller; Brandy Snyder, Director of Property Accounting and HR; and Jennifer Lester, Principal and COO. The inspectors presented their credentials and explained to the individuals from Moses Tucker the purpose of the EPA inspection was to perform a compliance inspection with regards to lead-based paint (LBP), specifically Section 1018 of TSCA and the RRP Rule. The inspectors also explained that the inspection was being conducted a response to a citizen complaint as discussed above.

Renovation Repair and Paint

The inspectors briefly reviewed the requirements of the RRP and discussed the ages of their properties and any renovation activities that had been performed within the last 5 years. Moses Tucker identified five properties that they managed that were built prior to 1978 and thus would be subject to the TSCA LBP regulations. The five buildings discussed were Main Street Lofts located at 524 Main Street; Mulberry located at 315 Main Street; The Paint Factory located at 1300 E. 6th Street; Dem Lofts located at 615 Main Street; and Tuff Nut located on River Market Avenue. They stated that within the past 5 years that they had not performed renovation work or other activities at these properties that would have triggered the requirements of the RRP (no work greater than 6 square feet interior or 20 square feet exterior). The Moses Tucker team stated that they could not with certainty provide the exact dates that these buildings were renovated and turned into lofts or apartments but believed it was at least 15 years ago. The facility was also unable to provide any information as to how the buildings were renovated at that time but felt like it was a total tear down and reconstruction of the interior space. They could not say with any certainty if the remodel had been done in conjunction with lead abatement or if the properties had been assessed to determine the presence of LBP. They asked for time to explore these questions in depth and determine the answer to these questions. The inspectors agreed to give the facility time to do so. According to a letter provided by Moses Tucker and other correspondence, they have contracted an environmental firm to conduct a lead assessment at the five properties in question. The lead assessment is anticipated to be concluded and available by Mid-February, 2025. If the lead assessment shows the presence of LBP at their pre-1978 properties, they will need to comply with any future renovations in accordance with the RRP Rule. This would require that any remodel or renovation activities disturbing greater than 6 square feet interior or 20 square feet exterior of painted surface is required to be performed by a company that is lead safe certified, have a lead certified renovator assigned to the project and follow work safe practices required by the RRP.

1018 Disclosure Rule

The EPA inspectors requested leases for each of the 5 pre-1978 buildings. They reviewed two leases from Tuff Nut Lofts, one lease from Arkansas Democratic Lofts, three leases from Mulberry Flats, four leases from Main Street Lofts and one from the paint factory (AKA 12 Star Flats). The leases reviewed represented approximately 10% of the leases at each property. The inspectors noted that none of the leases reviewed addressed LBP. The leases did not contain a lead addendum, the lead warning statements and no acknowledgment of the receipt of the lead hazards pamphlet. All leases were consistent between properties. It was explained to Moses Tucker that all leases for target housing should contain this information, every tenant should be receiving a pamphlet and sign an acknowledgment of receipt. Additionally, information Moses Tucker obtains relating to lead in these properties, will also need to be disclosed in the leases and made available to the tenants. On January 22, 2025, Moses Tucker provided a lead addendum that they indicated has been incorporated into their leases and will be used moving forward. The lead assessment that is currently being conducted will

need to be mentioned in this addendum and made available to tenants. Moses Tucker has indicated that they will comply with this requirement.

CONCLUSION

The inspection lasted approximately an hour and ended with a short discussion of the areas of concern that were identified during the inspection. Moses Tucker agreed to do a full review of their pre-1978 properties and alter their leases to comply with the requirement of the Disclosure Rule. Moses Tucker also agreed to share the requested information pertaining to lead at the target housing that was mentioned in this report.

Section III – AREAS OF CONCERN

The following areas of concern were noted and discussed during the inspection:

1. Moses Tucker failed to provide tenants with the lead hazard information pamphlet.
2. Moses Tucker failed to include the lead addendum in the leases of pre-1978 properties.
3. Moses Tucker failed to provide statement of known lead-based paint hazards or no knowledge of such hazards as part of the lease.
4. Moses Tucker failed to provide a statement from the Lessee affirming receipt of lead-based paint information.
5. Moses Tucker failed to include the “Lead Warning Statement” (provided below) in leases for pre-1978 properties.

Lead Warning Statement:

“Housing built before 1978 may contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Lead exposure is especially harmful to young children and pregnant women. Before renting pre-1978 housing, lessors must disclose the presence of known lead-based paint and/or lead-based paint hazards in the dwelling. Lessees must also receive a federally approved pamphlet on lead poisoning prevention.”

Section IV – FOLLOW UP

Moses Tucker committed to researching their pre-1978 properties, document information regarding lead-based paint in these properties and have this information available to tenants. Moses Tucker also agreed to modify their lease documents to comply with the requirements of the Disclosure Rule and indicating the availability of any LBP information. To date, Moses Tucker has provided a copy the proposed lead addendum for their properties, a letter from Hight Environmental with a cost estimate to perform lead assessment at the properties identified in this report as well as other information. The LBP assessment is anticipated to be complete by February 17, 2025 and shared with EPA as soon as possible. Moses Tucker has been cooperative and responsive throughout this investigation.

Section V – LIST OF APPENDICES

Appendix 1 – Notice of Inspection

Appendix 2 – Receipt of Samples and Documents

Appendix 3 – RRP checklist

Appendix 1

Notice of Inspection



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Notice of Inspection
Office of Enforcement and Compliance Assurance

1. Investigation Identification			3. Facility Name
Date <i>12-11-24</i>	Inspection Number <i>01</i>	Daily Seq. Number <i>01</i>	<i>Moses Tucker Partners</i>
2. Inspector's Address			4. Facility Address
			<i>200 River Market Ave Suite 300 Little Rock AR 72201</i>

For Internal EPA Use. Copies may be provided to the recipient as acknowledgment of this notice.

Reason for Inspection

Under the authority of Section 11 of the Toxic Substances Control Act

For the purpose of inspecting (including taking samples, photographs, statements and other inspection activities) an establishment, facility or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, control and facilities) and any conveyances being used to transport chemical substance, mixtures or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures or articles, within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

☐ A. Financial Data

☐ D. Personnel Data

☐ B. Sales Data

☐ E. Research Data

☐ C. Pricing Data

The nature and extent of inspection of such data specified in A through E above is as follows:

Compliance Evaluation

Inspector's Signature <i>Angela Hays</i>		Recipient's Signature <i>JL</i>	
Name <i>Angela Hays</i>		Name <i>Jennifer Lester</i>	
Title <i>Inspector</i>	Date	Title <i>Chief Operating Officer</i>	Date <i>12/11/24</i>

Appendix 2

Receipt of Samples and Documents



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Receipt for Samples and Documents
Office of Enforcement and Compliance Assurance

1. Investigation Identification			2. Company Name
Date 12-11-24	Inspection No. 01	Daily Seq. No. 01	Moses Tucker Partners
3. Inspector Address			4. Company Address
			200 River Market Ave Suite 300 Little Rock AR 72201

For internal EPA use. Copies of this form may be provided to recipient as acknowledgment of the documents and samples of chemical substances and/or mixtures described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

Receipt of Document(s) and/or Sample(s) Described is Hereby Acknowledged:

No.	Description
1	Five (5) Copies of leases - 1) ToF Not 2) Paint 3) Dem Lefts 4) main street 5) Mulberry

Optional: Duplicate or Split Samples: Requested and Provided ☐ Not Requested ☐

Inspector's Signature Angela Hays	Claimant's Signature JL
Name Angela Hays	Name Jennifer Lester
Title Inspector	Title Chief Operating Officer
Date 12/11/24	Date 12/11/24

Appendix 3

RRP Checklist



U.S. EPA

**Lead Renovation/Repair/Painting Compliance
Checklist – Property Management**
US ENVIRONMENTAL PROTECTION AGENCY
REGION 6, DALLAS, TX 75202
**TOXIC SUBSTANCES CONTROL ACT
TITLE IV-LEAD HAZARD REDUCTION**

Inspection Checklist

EPA Inspector Name	Stan Lancaster
EPA Inspector Telephone	214 665 8034
EPA Inspector Email	Lancaster.Stan@EPA.GOV
Inspection Date	12/10/24
Inspection Type:	RRP + 1019
Inspection Location	MOSES TUCKER offices

Firm Information

Company Name	Moses Tucker Partners
Address	200 River Market Ave Ste 300 Little Rock AR 722
Contact Name	Alex Greene Jennifer Lester David Cole
Contact Telephone	501 376 6555 501 376 6555
Contact Email	SEE CARDS
Manager Name	Jennifer Lester - Chief operating officer
Manager Telephone	501 376 6555 (C) 501 476 12298
Manager Email	jlester@mosestucker.com

EPA Firm Certification Number

	Y - N - N/A	Comments
Introduction & Purpose	Y	
Permission to enter granted	Y	
Permission to enter document signed	Y	
Facility/operator provided copy of entry document	Y	
Copy of Lead Base Paint Pamphlet provided	N	

David Cole - General Counsel

Jennifer

Alex

Brandy

The items identified in this inspection have the potential to incur civil penalties in the amount identified. Your firm has 90 days in which to submit proof that the items identified have been corrected. These deficiencies are of a serious nature and if left uncorrected could result in formal enforcement action. Your response should be submitted to:

Copy of inspection checklist and on-site report sent to:

Print Name: _____

Date _____

Email: _____

Facility/Company Name: MOSES TUCKER



U.S. EPA

**Lead Renovation/Repair/Painting Compliance
Checklist – Property Management**
US ENVIRONMENTAL PROTECTION AGENCY
REGION 6, DALLAS, TX 75202
**TOXIC SUBSTANCES CONTROL ACT
TITLE IV-LEAD HAZARD REDUCTION**

#	Reg Ref	Question	Y-N-N/A
1	40 CFR § 745.87(c)	Did the company permit entry for inspection?	Y
	Comments		
2	40 CFR § 745.87(c)	Did the company provide requested information and/or records during or after the inspection?	Y
	Comments		
3	40 CFR § 745.87(c)	Is this company a licensed real estate brokerage firm? If so, provide state licensing number in comments.	
	Comments		
4	40 CFR § 745.87(c)	Does this company manage target housing?	Y
	Comments		
5	40 CFR § 745.87(c)	How many target housing properties does this company manage?	5 Buildings
	Comments		
6	40 CFR § 745.87(c)	Are children under the age of 6 years living in any of these properties?	TBD
	Comments		
7	40 CFR § 745.87(c)	Are pregnant women living in these properties?	TBD
	Comments		
8	40 CFR § 745.87(c)	Has renovation/repair/painting work been performed on these properties?	Yes
	Comments	need to determine if it was ABATEMEN	
9	40 CFR § 745.87(c)	Which properties had RRP work performed and when? See List	TBD
	Comments		
10	40 C.F.R. § 745.84(a)(1)	Did the renovator or property manager provide the owner of the unit with the EPA-approved lead hazard information pamphlet?	N
	Comments		
11	40 C.F.R. § 745.84(a)(2)	Did the renovator or property manager provide the adult occupant of the unit (if not the owner) with the EPA-approved lead hazard information pamphlet?	N
	Comments		
12	40 C.F.R. § 745.84(b)(1)	In Common Areas, did the renovator or property manager provide the owner of the multi-family housing with the EPA-approved lead hazard information/pamphlet or to post informational signs?	NA
	Comments		
13	40 C.F.R. § 745.84(b)(2)	In Common Areas, did the renovator or property manager notify in writing, or ensure written notification of, each unit of the multi-family housing and make the pamphlet available upon request prior to the start of the renovation, or to post informational signs?	NA
	Comments		
14	40 C.F.R. § 745.84(c)(1)(i)	In renovation in Child-Occupied Facilities, did the renovator or property manager provide the owner of the building in which the child-occupied facility is located with the EPA-approved lead hazard information pamphlet?	NA
	Comments		

Facility/Company Name: MOSES TUCKER



U.S. EPA

Lead Renovation/Repair/Painting Compliance**Checklist – Property Management**

US ENVIRONMENTAL PROTECTION AGENCY

REGION 6, DALLAS, TX 75202

TOXIC SUBSTANCES CONTROL ACT**TITLE IV-LEAD HAZARD REDUCTION**

15	40 C.F.R. § 745.84(c)(1)(ii)	In renovation in Child-Occupied Facility, did the renovator or property manager provide an adult representative of the child-occupied facility with the pamphlet, if the owner is not the operator of the child-occupied facility?	NA
	Comments		
16	40 C.F.R. § 745.84(c)(2)	In renovation in a Child-Occupied Facility did the renovator or property manager provide the parents and/or guardians of children using the child-occupied facility with the pamphlet and information describing the general nature and locations of the renovation and the anticipated completion date, by mailing or hand-delivering the pamphlet and renovation information, or by posting informational signs describing the general nature and locations of the renovation and the anticipated completion date, posted in areas where they can be seen by parents or guardians of the children frequenting the child-occupied facility, and accompanied by a posted copy of the pamphlet or information on how interested parents or guardians can review a copy of the pamphlet or obtain a copy from the renovation firm at no cost to the parents or guardians?	NA
	Comments		
17	40 C.F.R. § 745.85 (1).	For all renovations, did the renovator or property management firm post signs clearly defining the work area and warning occupants and other persons not involved in renovation activities to remain outside of the work area; to prepare, to the extent practicable, signs in the primary language of the occupants; and/or to post signs before beginning the renovation and make sure they remain in place and readable until the renovation and the post-renovation cleaning verification have been completed?	N
	Comments		
18	40 CFR § 745.84(a)(1)(i)	Did the firm establish and maintain records and make those records available during the inspection?	N
	Comments		
19	40 CFR § 745.84(a)(1)(i)	Did the firm receive written acknowledgement from the owner for receipt of a lead education pamphlet?	N
	Comments		
20	40 CFR § 745.84(a)(2)(i)	Did the firm receive written acknowledgement from an adult occupant, of/for a lead education pamphlet?	N
	Comments		
21	40 C.F.R. § 745.84(a)(2)	Did the firm provide the adult occupant of the unit (if not the owner) with the EPA-approved lead hazard information pamphlet?	N
	Comments		
22	40 C.F.R. § 745.84(b)(1)	Did the renovator provide the owner of the multi-family housing with the EPA-approved lead hazard information/pamphlet or to post informational signs?	N
	Comments		

Facility/Company Name: MOSES TUCKER



U.S. EPA

**Lead Renovation/Repair/Painting Compliance
Checklist – Property Management**
US ENVIRONMENTAL PROTECTION AGENCY
REGION 6, DALLAS, TX 75202
**TOXIC SUBSTANCES CONTROL ACT
TITLE IV-LEAD HAZARD REDUCTION**

23	40 C.F.R. § 745.84(b)(2)	Did the renovator notify in writing, or ensure written notification of, each unit of the multi-family housing and make the pamphlet available upon request prior to the start of the renovation, or to post informational signs?	N
	Comments		
24	40 C.F.R. § 745.84(c)(1)(i)	Did the renovator provide the owner of the building in which the child-occupied facility is located with the EPA-approved lead hazard information pamphlet?	unknown
	Comments		
25	40 C.F.R. § 745.84(c)(1)(ii)	Did the renovator or owner provide an adult representative of the child-occupied facility with the pamphlet, if the owner is not the operator of the child-occupied facility?	N
	Comments		
26	40 C.F.R. § 745.84(c)(2)	Did the renovator or owner provide the parents and/or guardians of children using the child-occupied facility with the pamphlet and information describing the general nature and locations of the renovation and the anticipated completion date, by mailing or hand-delivering the pamphlet and renovation information, or by posting informational signs describing the general nature and locations of the renovation and the anticipated completion date, posted in areas where they can be seen by parents or guardians of the children frequenting the child-occupied facility, and accompanied by a posted copy of the pamphlet or information on how interested parents or guardians can review a copy of the pamphlet or obtain a copy from the renovation firm at no cost to the parents or guardians?	N
	Comments		
27	40 C.F.R. § 745.85 (1)	Did the renovator or property management firms post signs clearly defining the work area and warning occupants and other persons not involved in renovation activities to remain outside of the work area; to prepare, to the extent practicable, signs in the primary language of the occupants; and/or to post signs before beginning the renovation and make sure they remain in place and readable until the renovation and the post-renovation cleaning verification have been completed?	N
	Comments		
28	40 C.F.R. § 745.84(a)(1)	During the renovation did the renovator obtain, from the owner, a written acknowledgment that the owner has received the pamphlet, pursuant to 40 C.F.R. § 745.84(a)(1)(i) or failure to obtain a certificate of mailing at least 7 days prior to the renovation?	N
	Comments		
29	40 C.F.R. § 745.84(a)(2)	During the renovation did the renovator obtain, from the adult occupant, a written acknowledgment that the adult occupant has received the pamphlet, pursuant to 40 C.F.R. § 745.84(a)(2)(i) or failure to obtain a certificate of mailing at least 7 days prior to the renovation?	N
	Comments		

Facility/Company Name: MOSES TUCKER



U.S. EPA

Lead Renovation/Repair/Painting Compliance Checklist – Property Management

US ENVIRONMENTAL PROTECTION AGENCY

REGION 6, DALLAS, TX 75202

TOXIC SUBSTANCES CONTROL ACT

TITLE IV-LEAD HAZARD REDUCTION

30	40 C.F.R. § 745.84(b)(1)(i) 40 C.F.R. § 745.84(b)(1)	During the renovation in Common Areas, did the renovator obtain, from the owner, a written acknowledgment that the owner had received the pamphlet, or that information signs had been posted, or they had obtained a certificate of mailing at least 7 days prior to the renovation?	✓
	Comments		
31	40 C.F.R. § 745.84(b)(3)	During the renovation in Common Areas, did the renovator prepare, sign, and date a statement describing the steps performed to notify all occupants of the intended renovation activities and offer to provide the pamphlet?	✓
	Comments		
32	40 C.F.R. § 745.84(b)(4)	During the renovation in Common Areas, did the renovator notify, in writing, the owners and occupants of the scope, locations or expected starting and ending dates of the planned renovation activities, before the renovator initiated work beyond that which was described in the original notice?	✓
	Comments		
33	40 C.F.R. § 745.84(c)(1)(i)	During renovation in a Child-Occupied Facility, did the renovator obtain, from the owner of the building, a written acknowledgment that the owner had received the pamphlet, or obtained a certificate of mailing at least 7 days prior to beginning the renovation?	NA
	Comments		
34	40 C.F.R. § 745.84(c)(1)(ii)	During renovation in Child-Occupied Facility, did the renovator obtain from an adult representative of the child-occupied facility, if the operator of the child-occupied facility is not the owner of the building, a written acknowledgment that the operator had received the pamphlet, or obtained a certificate of mailing at least 7 days prior to beginning the renovation?	NA
	Comments		
35	40 C.F.R. § 745.84(c)(3)	During renovation in Child-Occupied Facility, did the renovator prepare, sign and date a statement describing the steps performed to notify all parents and guardians of the intended renovation activities and to provide the pamphlet?	NA
	Comments		
36	40 C.F.R. § 745.84(d)(1)	During all renovations, did the renovator include a statement recording the owner or occupant's name and acknowledgement of receipt of the pamphlet prior to the start of the renovation, the address of the unit undergoing renovation, the signature of the owner or occupant as applicable, and the date of signature?	✓
	Comments		
37	40 C.F.R. § 745.84(d)(2) and (3)	During all renovations, did the renovator provide written acknowledgment of receipt of the pamphlet on either a separate sheet or as part of any written contract or service agreement for the renovation, and written in the same language as the text of the contract or agreement or lease or pamphlet?	✓

Facility/Company Name: MOSES TUCKER



U.S. EPA

**Lead Renovation/Repair/Painting Compliance
Checklist – Property Management**
US ENVIRONMENTAL PROTECTION AGENCY
REGION 6, DALLAS, TX 75202
**TOXIC SUBSTANCES CONTROL ACT
TITLE IV-LEAD HAZARD REDUCTION**

	Comments	
38	40 C.F.R. § 745.86	During all Renovations, did the renovator or property manager retain all records necessary to demonstrate compliance with the residential property renovation for a period of 3 years following completion of the renovation activities?
	Comments	
39	40 C.F.R. § 745.225 (i)	During all Renovations, did the renovator, or property manager implement a program to maintain and make available to EPA upon request, records for a period of 3 years and 6 months?
	Comments	
40	40 C.F.R. § 745.225, 745.226, 745.227, 40 C.F.R. § 745.235 (b)	In Target Housing and Child-occupied Facilities, did the owner, renovator, or property manager establish, maintain, provide, copy, or permit access to records or reports?
	Comments	

NA
no records
since initial

N

Target Housing

Major = one or more occupants under age 6 and/or pregnant woman

Significant = no information about age of the youngest occupant, or one or more occupants between ages of 6 and 17

Minor = no occupants under age 18

Child Occupied Facility

Major = one or more occupants under age 6 (by definition, a child-occupied facility is regularly visited by one or more children under 6)

Minor = renovation activities were completed during a period when children did not access the facility (e.g., as summer vacation) and there is no continuity of enrollment (i.e., the same children are not returning after the break).

Facility/Company Name: MOSES TUCKER