

Rating Factor 1

a. Performance History:

This is the City of Biddeford's second application to the Office of Lead Hazard Control and Healthy Homes for Lead Hazard Reduction (LHR) and Healthy Homes (HH) funding. The initial \$3.2 million grant, awarded in 2019, faced many barriers to meeting its unit clearance target of 135 units. First, the benchmark was unrealistic for the city's size and inexperience with HUD lead programs; an achievable target of 90 lead-safe units over the coming grant period is the new goal. Second, all lead grantees, including Biddeford, were seriously hampered by COVID-19, which hit just a month after HUD approved the City's final lead program budget. The pandemic caused economic uncertainty for property owners, whose top priority was not lead abatement, but rather maintaining rental income as tenants experienced layoffs, shutdowns, or reduced work hours. The City's 10% owner-paid contribution requirement toward the cost of abating each property did not help during this period of uncertainty. The new grant will require no owner contribution thanks to the City's ability to leverage \$270,000 in matching dollars from its Community Development Block Grant and a grant from the Maine Housing Authority. Finally, current grant performance was stymied by post-COVID labor shortages, which negatively impacted the availability and timeliness of the City's program partners and abatement firms. In the new grant, the City will grow staffing capacity and contract locally to deliver crucial community-based functions that drive lead program quality and timeliness, including: the owner application process; tenant eligibility screening and wrap-around community liaison services for at-risk and lead-poisoned households; temporary relocation; and lead inspection and unit clearance oversight. The new grant will also focus on bringing an additional 45 lead workers into the labor market (the current grant trained 80 lead professionals) and shoring up 4 new

abatement firms to bid on projects (3 new firms that were trained and licensed as a result of Biddeford's current grant). A missing component will be added in the new grant: mentorship and business coaching to help new lead professionals succeed in launching and sustaining their own Maine-licensed abatement companies.

b. Program Administration and Oversight:

The purpose of this LHR grant proposal is to continue the Safe & Affordable Homes for Healthy Families (SAHHF) program. Key partners will continue to include: Coastal Healthy Communities Coalition (CHCC) at the University of New England (UNE); the Biddeford Housing Authority (BHA); the Maine Department of Environmental Protection (DEP); the Maine Childhood Lead Poisoning Prevention Program (MCLPPP) at the Center for Disease Control and Prevention; the Biddeford Ready! coalition of early childhood advocates; York County Community Action Corp. (YCCAC); and Southern Maine Health Care (SMHC), all local nonprofits or lead-focused state agencies. As the lead applicant, the City will deliver grant oversight and financial management. Most key staff positions for SAHHF and critical partners have been identified. Each possesses years of federal grant and program administration experience. SAHHF will integrate LHR and HH supplemental funding with the City's CDBG Housing Rehabilitation fund, YCCAC's Weatherization, Energy Assistance, and Home Repair Programs, and BHA's Housing Choice Voucher program. SAHHF will continue to collaborate with the City's Life Safety Inspection Program in multifamily properties with 3 or more units to increase the number of fully code-compliant homes.

Program Process Map (Attachment A): LHR grant funding will be used to hire 3 positions (Attachment B). The first is the existing 0.9 FTE **SAHHF Program Manager** who is responsible for day-to-day program management of the LHR & HH grants, with oversight from

the Project Director. The second is a new 1.0 FTE **Community Liaison Specialist (CLS)** who will work 1:1 with at-risk and lead-poisoned households to help them apply to and benefit from SAHHF by: performing tenant outreach, intake, eligibility screening, and temporary relocation; demonstrating lead-safe cleaning and unit maintenance practices; and making appropriate referrals to health, emotional, and social supports to enhance the household's overall quality of life, health, and housing. The third position is a new 1.0 FTE **Lead Program Assistant (LPA)** who will spend approximately half time in the community supporting the Program Manager in property owner and referral source outreach, owner application intake, registry of deeds/title search work, property inspection for the environmental review process, and on-site progress reporting on LHR projects that are underway. The other estimated half of the LPA's time will be office-based administrative work, including HHGMS data input, owner application processing, state and local historic preservation review, creation/revision of program documents, interface with the Life Safety Inspection Program, scheduling bid walks and bid openings, and other related tasks. The initial point of contact for owner-applicants will be the LPA, who will gather and verify applicant information and recommend the application's approval or denial by the Program Manager, according to eligibility criteria. For properties receiving leverage-funded rehabilitation, the Program Manager will document CDBG Housing Rehabilitation, YCCA weatherization, and other energy efficiency programs to ensure leverage fund data is collected and meets program requirements. The Program Manager will coordinate all activities associated with the LHR and HH work, from lead inspection through to final lead clearance and all the steps in between. The Program Manager, with oversight from the Director and assistance from the Grants Accountant, will also monitor project budgets and unit costs against approved benchmarks to assure contractor compliance with the work scope, keep unit costs in line with the

projected per-unit budget, and maintain steady progress toward project completion. The final contractor invoice will be disbursed only after the property has passed a final clearance inspection by the Program Manager and contracted lead clearance professional. Financial control for the Program will include all contractor invoices verified against the project budget and countersigned by the Program Manager and owner; monthly reconciliation of expenditures against the Program budget; and a regularly scheduled monthly LOCCs draw, with the request prepared by the Program Manager and countersigned by the Program Director or Grants Accountant. All program invoices will be paid to contractors and sub-grantees only upon presentation of valid documentation and verification of work completed. Once invoices are approved for payment, the Grants Accountant will be responsible for bill paying, monthly financial reporting, and performing the LOCCS drawdowns from the LHR and HH grants. The City utilizes MUNIS accounting software (Attachment C) to properly allocate and process financial transactions and will establish separate program accounts to avoid possible co-mingling of funds with other HUD programs. The Finance Department conducts an annual financial audit as well as a Federal Single Audit in accordance with Governmental Auditing Standards and OMB Circular A-133. The Program Manager tracks statistical data, including enrollment, units in production, units cleared, tenant demographics, per-unit costs, and obstacles to achieving benchmarks using the Healthy Homes Grant Management System (HHGMS). This information is tracked and reported out monthly to the core SAHHF team: the Program Director, CLS, LPA, Lead Inspection and Final Clearance Contractor, and Grants Accountant. HUD Quarterly Reports are also completed by the Program Manager in HHGMS.

Staffing Plan: Biddeford's Planning and Development Department oversees SAHHF administration and management. The **Project Director**, Gregory Mitchell, has directed the

City's Planning and Development Department since July 2022 and has 24 years' experience in managing housing intervention programs such as HUD LBPHC, HOME, CDBG, NSP, and EPA Brownfields grants, among others. The **Program Manager**, Gail Wilkerson, will continue to administer SAHHF under the new grant, where she will oversee day-to-day program operations, staff, fiscal accountability, and regulatory compliance. Reporting to the Project Director, she will coordinate all phases of the LHR and HH process and supervise the work of the new CLS and LPA positions, in addition to managing program growth, unit production, sub-grantee efforts, site monitoring, and project budgeting and program reporting to HUD. Ms. Wilkerson has nearly 3 years' experience in LHR and HH program management experience and holds Lead Inspector, Risk Assessor, and Lead Supervisor certifications. She has 4 additional years' experience managing CDBG housing rehabilitation projects and administering HUD programs such as Housing Choice & Mainstream Vouchers and Public Housing Authority Capital Improvement Funds and Asset Management Programs. A former social services administrator, Ms. Wilkerson has more than 15 years' experience developing and managing evidence-based government-reimbursed programs designed to help low-income individuals improve their quality of life, health, and housing. The **Community Liaison Specialist (CLS)** is a new position that will specialize in all aspects of the LHR and HH experience as it impacts tenant households. The focus of the position is in-community work and 1:1 engagement of at-risk and lead-poisoned children and their families to help them access the LHR and HH Program as well as appropriate local healthcare and emotional and support services via referral. To this position, the CLS will bring 3 years' experience as a community liaison, social service worker, or similar human services role, and he/she will have or demonstrate the ability to build a network of community contacts to serve the whole-person needs of at-risk and lead-poisoned children and their families.

A degree and/or background in social services is highly preferred. The CLS will assist households with the SAHHF program application process, support them in the income-screening and eligibility phase, and help demonstrate lead-safe cleaning and maintenance in the home. The CLS will be the household's resource throughout the LHR and HH construction process, assuring that members are informed at each step, that their individual circumstances are accommodated during the temporary relocation process, and that other fundamental needs are met (health, social, and emotional). The position will work closely with the CHCC Public Health staff to coordinate client-facing events, strategies, and community engagement. The **Lead Program Assistant** (LPA) position is a new role that will be hired upon grant award to assist the Program Manager in both in-community and administrative responsibilities (roughly half-time direct service and half-time administrative). The LPA will support the Program Manager in property owner and referral source outreach, owner application intake, registry of deeds/title search work, property inspection for the HUD environmental review process, and on-site progress reporting on LHR and HH projects during construction. The other estimated half of the LPA's time will be spent on office-based administrative work, including HHGMS data input, owner application processing, state and local historic preservation review, creation/revision of program documents, interface with the Life Safety Inspection Program, scheduling bid walks and bid openings, and other related tasks. The LPA position will be required to obtain Lead Supervisor, Lead Inspector, and Lead Risk Assessor certification. Two years' experience in housing, construction, project management, code enforcement, or the building trades is required (a combination of training and education will be considered). The role also requires experience in data entry, Adobe Acrobat, Microsoft Office suite or similar word processing, spreadsheet, and document creation and editing software. Minimum of a high school diploma required, with

preference for a two-year degree. The **Grants Accountant**, Nichole Wood, has worked at the City of Biddeford since 2021 as the Director of Finance. Ms. Wood financially accounts for all grants within the city, including oversight of their accounts payable, accounts receivable, payroll, bank reconciliations, LOCCS drawdowns and financial reporting in consultation with the Program Manager. The finance department utilizes MUNIS as its primary accounting and program tracking software system. Ms. Wood has 20 years' experience in finance and accounting in public and private institutions and sits on the Board of Directors for several local financial institutions. The **Communications Coordinator**, Danica Lamontagne, brings more than 5 years' experience in marketing/ communications, social media, website development, and PR to SAHHF to enhance its awareness in the community.

c. Sub recipient Sub grantee

Coastal Healthy Communities Coalition (CHCC) (DUNS 07-173-5252) at the University of New England's College of Osteopathic Medicine is a comprehensive community health coalition focused on improvements in physical activity and nutrition, youth substance misuse, and childhood lead poisoning. CHCC contracts with the Maine CDC to help reduce the region's incidence of lead poisoning. Working with regional libraries, service clubs, child care providers, health care providers, public health nurses, outreach workers, peer educators, and property owners' associations, CHCC delivers education about lead paint hazards to families and rental unit owners during events and classes and via neighborhood networks. The coalition also promotes lead poisoning prevention and blood lead testing using mass media. As a renewing LHR grant partner, CHCC will be able to specifically focus efforts in Biddeford on families with young children, encouraging them to test for lead dust with free in-home kits, perform lead-safe cleaning in the home, and assure their children under age 3 are screened for lead. CHCC Director

Cheri Sullivan is the **SAHHF Public Health Coordinator**. She holds a master's degree in counseling, has 10 years' experience in public health, and has further background in early childhood and special education. Under her guidance, CHCC will craft lead-paint-focused public outreach campaigns and special events here in Biddeford, convene the Biddeford Area Property Owners Association for in-person lead hazard education, and offer online training programs and scholarships for Biddeford residents seeking Renovate, Repair and Paint (RRP) certification.

d. Partnerships

SAHHF has developed positive partnerships with an array of agencies, all working to end childhood lead poisoning in Maine. These include the Maine CDC's MCLPPP; Maine DEP; CHCC; BHA; YCCAC; and SMHC. Biddeford is an active member of the State's LHR Workgroup, which includes MaineHousing (the state housing authority) and the cities of Lewiston, Auburn, and Portland, all of which are current LHR grantees, the Maine CDC's MCLPPP, and Maine DEP. In Biddeford, preventing childhood lead poisoning has become the focus of both grassroots and City-led efforts, with considerable community will and buy-in generated in recent years. Specifically, the Biddeford Ready! early childhood coalition (with leadership from the City, school department, WIC, Head Start, Child Development Services, healthcare providers, and other early childhood advocate agencies) has identified barriers to school readiness for children under age 5. Not surprisingly, lead poisoning has been identified as a significant concern due to its impact on children's learning, behavior, and attention, among other effects and is included in the 2019 Consolidated Plan (Attachment D).

e. Contractor Capacity

During the current grant period, SAHHF has funded the training of 80 individuals wishing to become lead professionals, surpassing our benchmark goal by 78%. These individuals have all

become certified Maine lead inspectors, risk assessors, project supervisors, and RRP professionals. Given that all but RRP professionals need to be re-certified annually, SAHHF will invest new grant dollars to train and/or re-certify 45 lead professionals so they can become or remain employed by firms serving southern Maine. In terms of the growth in the number of licensed abatement companies, the [Maine DEP website](#) (Attachment E) shows there are now 72 firms in the state, up from fewer than 20 in 2019. Of these firms, the current SAHHF grant has paid to train and certify 3 new firms (Northstar, Sanderson Painting and Restoration, and Get the Lead Out) to work on Biddeford's LHR projects. Even so, these and only 7 other firms have ever bid on SAHHF projects. This is because many firms are property management companies that only work at their own sites; still others focus their efforts exclusively in Lewiston, Auburn, and Portland, all cities with a greater incidence of childhood lead poisoning than Biddeford. The relative dearth of firms working in Biddeford has led to unacceptably long waits for LHR work, and in at least one case, a child with an elevated blood lead level may have become re-poisoned as a result. To address this critical issue, the new SAHHF grant will not only invest in the training and licensing of up to 4 new firms, but it will also pair them with already successful local abatement entrepreneurs to provide mentoring in business acumen, LHR bidding expertise, credit access, and the supplier relationships needed to become viable local contractors upon whom SAHHF can rely for immediate availability, particularly for properties under an order to abate due to a lead-poisoned child. It is believed this mentorship approach will be unique in Maine, and SAHHF looks forward to breaking new ground in this important area.

Rating Factor 2

1. Target Area Need – Quantitative Measures

SAHHF’s target area is Biddeford’s high-risk census tracts, now numbered 252.03, 252.04, 252.05, and 252.06 (Attachment F), previously known as tracts 252.01 and 252.02. These downtown neighborhoods are home to the city’s oldest housing stock, which is largely multifamily tenement-style housing built before 1978, often poorly maintained, and ranging in size from duplexes to 25-unit structures. These units provide the lion’s share of rental housing to Biddeford households of low income. Due to the overall condition of these aging buildings, the City’s Code Office established a Multifamily Life Safety Inspection Program in 2017 for all buildings with 3 or more units. **To date, 663 structures, or 2,645 units, have been reviewed, yet only 79 structures (12%) have achieved full code compliance.** Among the substantial condition issues identified have been lead-based paint hazards.

Target Area Data	Target Area Results	Comparison Data	Comparison Data Results	Justification of Need %	Data Source
Pre-1978 Occupied Rental Housing Units	3,152	Total Target Area Occupied Rental Housing Units	4,039	78%	American Community Survey 2020 5-Year Estimates
Pre-1940 Occupied Rental Housing Units	1,559		4,039	39%	
# of Children under Age 6	535	Total Target Area Population (ALL AGES)	12,531	4%	American Community Survey 2020 5-Year Estimates
# of Disadvantaged communities census tracts in target area	2	Total # of census tracts in Target Area	4	50%	Climate & Economic Justice Screening Tool

Table 1C is below and included as Appendix G. This data is from Maine CDC.

Number and Percent of newly identified children under 6 years of age, by confirmation status, Selected Census Tracts in Biddeford, 2017-2021

Reference Level >= 5 ug/dL										
Location	Year	# Confirmed, EBLL >=5 ug/dL	# Unconfirmed (5-<10 ug/dL)	# Screened	Estimated Confirmed >= 5 ug/dL (0.38)			Confirmed EBLL >= 5 ug/dL		
					≥ 5 ug/dL estimated Count	>= 5ug/dL Estimated Percent	Est. Percent 95% CI	>=5 ug/dL Confirmed Percent	Percent Confirmed 95% CI	P-value*
Census Tracts (252.01, 252.02)	2021	8	1-5	202	1-5	*		4.0	1.7-7.7	0.5049
Biddeford	2021	9	1-5	313	1-5	*		2.9	1.3-5.4	Ref
Census Tracts (252.01, 252.02)	2020	4	6	193	6	3.1	1.2-6.6	2.1	0.6-5.2	0.576
Biddeford	2020	4	8	286	7	2.5	1.0-5.0	1.4	0.4-3.5	Ref
Census Tracts (252.01, 252.02)	2017-2021	38	43	1143	54	4.7	3.6-6.1	3.3	2.4-4.5	0.1486
Biddeford	2017-2021	40	50	1663	60	3.6	2.8-4.6	2.4	1.7-3.3	Ref
Census Tract (252.01)	2017-2021	12	19	426	19	4.5	2.7-6.9	2.8	1.5-4.9	0.6318
Biddeford	2017-2021	40	50	1663	60	3.6	2.8-4.6	2.4	1.7-3.3	Ref
Census Tract (252.02)	2017-2021	26	24	717	36	5.0	3.5-6.9	3.6	2.4-5.2	0.1042
Biddeford	2017-2021	40	50	1663	60	3.6	2.8-4.6	2.4	1.7-3.3	Ref
Census Tract (252.01,252.02)	2017-2021	38	43	1143	54	4.7	3.6-6.1	3.3	2.4-4.5	<0.0001
Rest of Biddeford	2017-2021	2	7	520	5	1.0	0.3-2.2	0.4	0.05-1.4	Ref

Note: 2020 population estimate, Biddeford <6 yrs N=1,202. The 2021 Screening Rate, Biddeford: 26% (313/1202). Population estimate source: Maine CDC, DRVS.

Target area need – Narrative Aspects

As is well documented, key risk factors for childhood lead poisoning include living below the poverty line and living in pre-1950's housing. In the target area, 15% of children have lived below the poverty level in the last 12 months, based on the [2020 American Community Survey \(ACS\) 5-Year Estimates](#). This compares to 14.2% of families with children city-wide, and only 9.2% county-wide, according to Maine CDC estimates for the period 2015-2019. In terms of the housing conditions risk factor for lead poisoning, nearly 40% of occupied rental units in the target area are pre-1940's era, and nearly 1,600 more occupied rental units were built from 1940 to 1978, when lead-based paint for residential use was finally banned. All told, more than 3 in 4 occupied rental units in the target area pose a health risk to young children due to potential lead-based paint hazards.

It is therefore not surprising that Biddeford is now third among the Maine CDC's 4 'High-Risk Areas' for the greatest burden of lead-poisoned children. As indicated in Table C above, the CDC's data show strong evidence that children residing in the SAHMF target area (Census Tracts 252.01 and 252.02) have a higher incidence of elevated blood lead levels (≥ 5 ug/dL) compared to children living in the rest of Biddeford. More specifically, the target area has a higher percentage of children under age 6 who are newly identified with a confirmed blood lead level ≥ 5 ug/dL compared to Biddeford children who do not live in the designated Census Tracts ((3.3%(2.4-4.5), 0.4%(0.05-1.4);p-value < 0.0001). In addition, Table C shows the estimated number and percent of children with a blood lead level ≥ 5 ug/dL, among those screened. A blood lead test is considered a "screening test" only when a child has no prior history of a confirmed blood lead ≥ 5 ug/dL. The estimated number of children with a blood lead level ≥ 5 ug/dL is the number with confirmed tests plus 38% of the children with unconfirmed 5- < 10 ug/dL tests. A blood lead result is considered unconfirmed if it is a single capillary specimen ≥ 5 ug/dL. The conversion factor of 38% is based on the historically observed percent of capillary unconfirmed screening results that have a confirmatory venous test result ≥ 5 ug/dL. For more information on computing the estimated number of children with a blood lead level at or above 5 ug/dL, see the "About the Data" tab of the 'Lead Poisoning' content area of the [Maine Tracking Network](#) Data Portal. SAHMF utilizes this resource to track its impact and report local trends to HUD.

The Maine CDC conducts a full lead investigation of a child's home when a venous blood lead test result is ≥ 5 ug/dL and has the statutory authority to issue lead hazard abatement orders. The CDC shares this information with SAHMF, which gives the home priority status in the LHR program. However, to encourage property owners to proactively address lead hazards, SAHMF

also markets directly to multifamily buildings in the target area via direct mail, updates to the Biddeford Area Landlords Association, and regular postings on the SAHHF [website](#) and social media.

Rating Factor 3 Budget Estimate of Costs

Fiscal Oversight and Financing Strategy Narrative

SAHHF's financial assistance for LHR work will continue to be offered in the form of 3-year payment-deferred 100%-forgivable loans at 0-percent interest. Loans are secured by a promissory note and mortgage to help assure owner compliance with renters' household income requirements and lead-safe essential maintenance. LHR loans are forgiven at the end of the 3 years, provided all SAHHF requirements are met. Failure to comply with fair housing, affordability criteria, affirmative marketing, or the rental of lead-safe units to families with children under age 6 on a priority basis will trigger immediate repayment of loans. The Program Manager will continue to be responsible for developing each project budget and approving LHR loans in keeping with program guidelines. The maximum forgivable LHR loan will be \$15,000 per unit, with waivers of up to \$20,000 per unit based on need. LHR requests of more than \$20,000 per unit will be subject to HUD review and approval. HH supplemental funding will continue to be delivered as grants of up to \$5,000 per unit with a focus on outstanding notices of violation from the Code Office or newly discovered life safety issues. HH requests of more than \$5,000 will be subject to HUD review and approval. Target properties will continue to be multifamily rental units in the target area, including both owner-occupied and investor-owned buildings. As in the current grant, a special focus will be placed on properties accepting tenant-based rental assistance (Section 8), since voucher-holding households automatically qualify as units eligible for LHR assistance. Given its foundational successes in the current grant period,

SAHHF projects to clear 90 rental units of lead hazards and deliver HH interventions in 70 units over the new 4-year program horizon. With support from the Program Manager, the new LPA position will help develop project bid packages based on Manager-approved scopes of work and project specifications created by the contracted lead abatement designer(s). All interested state-licensed abatement firms will be invited to receive bid packets and attend property site walks during the procurement process for each project; however, only pre-qualified contractors in good standing with the City who are also SAM.gov-registered and not debarred from receiving federal grant funding will be awarded LHR or HH work. SAHHF will continue to leverage funding from partner programs, including: the City's own CDBG Housing Rehabilitation Program and its MaineHousing Community Solutions Grant; the Maine CDC's in-kind donation of lead inspection, risk assessment, and laboratory testing costs in properties placed under an abatement order; in-kind donations from Lowe's and other building material suppliers; the local community action program's weatherization, home repair, and energy efficiency programs; and the Efficiency Maine program. At start-up, the new CLS position, with guidance from the Program Manager, will work closely with the local hotel/motel/and short-stay accommodations sector to negotiate favorable stay rates for households temporarily relocated during abatement. The CLS will also benchmark other Maine LHR grantees' temporary relocation processes, strategies, and recommendations for assuring households impacted by an abatement are minimally inconvenienced as a result of needing to leave their homes. Biddeford will meet Section 3 requirements by giving close attention to projects in which funding exceeds \$100,000, but also by continuing to train low-income residents in lead professions, and collaborating with abatement contractors to hire newly certified Section 3 lead workers. Additionally, SAHHF will continue its work with the local center of technology and adult education programs to train

students of all ages in lead paint remediation and RRP, reaching a nascent low-income population and preparing additional technical expertise for the local workforce. As part of the bid notification process, all contractors will be made aware of appropriate HUD requirements, including Section 3, and its requirement that firms holding LHR contracts of more than \$100,000 must demonstrate hours worked by Section 3 and Targeted Section 3 workers.

Local resident outreach will continue to include the City's web-based/electronic newsletter, SAHFF's [Lead Program website](#), and social media platforms including Facebook, Instagram, and Twitter. In addition, the Constant Contact platform will be used by CHCC for regular communications with the local property owners' association.

Sustainability of Fiscal Resources:

As one of Maine's oldest mill towns, Biddeford has deteriorating lead paint in its housing stock that will present health hazards for years to come. With HUD grants, SAHFF's goal is to achieve long-term sustainability by developing permanent capacity to both raise property owners' awareness of and to ultimately detect, assess, and enforce the abatement of lead risk hazards as part of the City's evolving Code Enforcement and Multifamily Life Safety Inspection Programs. By expanding the local network of certified RRP and licensed abatement firms and workers, strengthening partnerships with owners of multifamily rental properties, weaving the 'Healthy Homes' philosophy into both local community support networks and the City's climate change action strategies, and continuing to offer free education and new, well-paying career pathways to Biddeford vocational students and adult learners of all ages, SAHFF will incrementally sustain its current grant-funded community efforts and ultimately end childhood lead poisoning in Biddeford.