

FACT SHEET

School and Child Care Facility Monitoring and Reporting

Summary

Beginning **November 1, 2027**, community water systems (communities) must comply with the Lead and Copper Rule Improvements (LCRI). The LCRI establishes additional lead sampling requirements at schools and licensed child care facilities (CCF) they serve, unless a school or licensed child care facility:

- Was constructed or had full plumbing replacement on or after January 1, 2014, **AND**
 - It is not served by a lead, galvanized requiring replacement, or unknown service line,
- **OR** is already regulated as a public water system.

These requirements include, but are not limited to, provisions for including school and CCF sampling opportunities in Consumer Confidence Reports, clarifying the applicability and content of public education material that must be provided to schools and CCF, and distinguishing the different sampling requirements at elementary schools and CCF versus secondary schools.

Definitions

Child Care Facility: A location housing a licensed provider of child care, day care, or early learning services to children.

Elementary School: A *school* composed of any span of grades from pre-school to grade 8.

Secondary School: A *school* composed of any span of grades beginning with the next grade after elementary school and ending with grade 12. This includes both junior and senior high schools.

Elementary School and CCF Lead Monitoring Requirements

No later than **November 1, 2027**, communities must submit a list of all schools and CCF that they serve. The list of schools and CCF served **must** be verified once every five years, either by submitting an updated list **or** certifying that no changes have occurred. The first verification must occur no later than **January 30, 2033**.

Communities must also create a proposed sample schedule for every elementary school and CCF that meets the sample frequency requirements.

Sampling Frequency

No later than **December 31, 2032**, one round of lead tap sampling must be completed at **every elementary school** and **every CCF** served by the community.

Every year, communities must complete lead tap sampling at a minimum of **20% of their elementary schools** and **20% of their CCF** until all such facilities have had at least one round of lead tap sampling.

Properly documented facility non-response or refusal will count towards the community's 20% sampling requirement.

Appropriate Non-Response Documentation

- At least **two (2) attempts** to contact a facility to schedule sampling
- Outreach records should include:
 - Dates of contact attempts
 - Method of attempt
 - Copies of letters/e-mails/outreach material

Appropriate Refusal Documentation

- E-mails/letters from the facility showing their refusal
- Summaries of conversations (phone/in-person) between facility and municipal personnel
- Summaries should include dates and full names of all persons involved

Secondary School Lead Monitoring Requirements

Beginning **November 1, 2027**, communities must conduct annual public education to secondary schools, informing them that they are eligible for lead sampling upon request. Communities **must** conduct sampling at a secondary school if sampling is requested.

Communities are not required to sample more than 20% of the secondary schools identified on the list of schools and CCF they serve per year **nor** are they required to sample an individual secondary school more than once per five-year period.

Sampling Protocol

For each **school** sampled, communities must collect five samples to be taken at:

- Two (2) drinking water fountains
- One (1) kitchen faucet used for drinking or cooking
- One (1) classroom faucet
- One (1) nurse's office faucet

For each **CCF** sampled, communities must collect two samples, to be taken at:

- One (1) drinking water fountain
- One (1) kitchen faucet **or** classroom faucet **or** faucet providing water for human consumption

When sampling at a school or CCF, communities must ensure that:

- Samples at schools and CCF must be taken at fixtures used to provide water for human consumption
- Sampled fixtures must not have point of use (POU) devices, unless **all** fixtures used for human consumption have POU devices installed **OR** there are fewer than the required number of fixtures.
- Samples are taken from a cold water tap
- Samples are first draw samples
- Samples are 250 milliliters in volume
- The water has been stationary for at least 8, but no more than 18 hours
- Samples have been collected by an appropriately trained individual.

School and CCF Reporting and Notification Requirements

Communities must provide a list of the schools and CCF they serve **or** certify that no schools or CCF are served no later than **November 1, 2027**.

Beginning **January 30, 2029**, and every year thereafter, communities that certified serving no schools or CCF must **recertify** that no schools or CCF are served.

Notification of Results

No later than **30 days** after receiving sampling results, communities must:

- Provide these results to the school or CCF sampled **and** include remediation information consistent with EPA's 3Ts for Reducing Lead in Drinking Water Toolkit (EPA-815-B-18-007) or any subsequent EPA guidance.
- Provide these results to the local health department.
- Provide these results to the State.

Results and remediation information must be provided **regardless of** lead sample concentration.

Public Education to Schools and CCF

Beginning **November 1, 2027**, communities must contact all schools and child care facilities (CCF) on the list of schools and CCF they serve **once per year** to provide information about the health risks of lead in drinking water.

Communities must conduct annual public education for schools and CCF regardless of any facilities that are waived for sampling.

Please refer to the "Alternative School and Child Care Facility Sampling Programs" fact sheet for additional information on sampling waivers.

For five years after **November 1, 2027**, communities must notify 20% of elementary schools and 20% of CCF **every year** that they are eligible for lead sampling. This notice must include:

- A proposed schedule for sampling at the school or CCF **AND**
- EPA's 3Ts Toolkit for Reducing Lead in Drinking Water Toolkit (EPA-815-B-18-007), or any subsequent EPA guidance.

For five years after **November 1, 2027**, communities must contact all secondary schools on the list of schools and CCF they serve **once per year** to inform them that they are eligible for lead sampling upon request. This notice must include:

- Information on how to request lead sampling **AND**
- EPA's 3Ts Toolkit for Reducing Lead in Drinking Water Toolkit (EPA-815-B-18-007), or any subsequent EPA guidance.

Beginning **January 1, 2033**, communities must notify all schools and CCF they serve that they are eligible for lead sampling upon request.

Annual Activity Report

No later than **January 30, 2029**, and annually thereafter, communities must submit an annual report to the State, using forms provided by the Department of Water, Energy, and Environment, that includes:

- ☐ Certification of good faith efforts to identify schools and CCF.
- ☐ Certification of no changes to school and CCF list.
- ☐ Certification that information about the health risks of lead in drinking water was delivered to schools and CCFs.
- ☐ Certification that sampling results were provided to schools, CCF, local health departments, and the State.
- Until **January 30, 2033**:
 - ☐ Certification that notification and sampling requirements have been met for elementary schools, secondary schools, and CCF
 - ☐ The number and names of schools and CCF served
 - ☐ The number and names of schools and CCF sampled in the previous year
 - ☐ The number and names of elementary schools and CCF that declined sampling
 - ☐ The number and names of elementary schools and CCF that were non-responsive
 - ☐ Information pertaining to outreach attempts that were declined or received no response
- Beginning **January 30, 2034**:
 - ☐ Certification that notification and sampling requirements have been met for elementary schools, secondary schools, and CCF