



VOLUNTEER LEAD TESTING PROGRAM FOR SCHOOLS AND CHILDCARE FACILITIES

Stacey Odom

Source and Drinking Water Program
Division of Water Resource Management
Florida Department of Environmental Protection

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TOPICS

- Federal grants to reduce risks in schools and childcare facilities.
- Florida's Voluntary Lead Testing Program for Schools and Childcare Facilities.
- Florida's program funding and objectives.
- Who qualifies and how is assistance prioritized in Florida?
- Florida program partners.
- Benefits for participating facilities.
- What happens when an exceedance is identified?
- Florida's program participation, results and achievements.
- Remediation efforts for exceedances.
- Program contact information.



FEDERAL GRANTS TO REDUCE RISKS IN SCHOOLS AND CHILDCARE FACILITIES

- The federal Water Infrastructure Improvements for the Nation (WIIN) Act established the **Lead Testing in School and Childcare Program Drinking Water Grant** in 2016.
 - This program was designed to award funding to states, territories and tribes to assist local and tribal educational agencies in voluntary **testing** efforts.
- The federal Bipartisan Infrastructure Law of November 2021, amended the grant program to the **Voluntary School and Childcare Lead Testing and Reduction Grant Program**.
 - This amended program allows funds to be used for additional activities beyond testing, including **compliance monitoring** and **remediation**.
- On July 24, 2023, the U.S. Environmental Protection Agency (EPA) announced additional grant funding for protecting children from lead in drinking water at schools and childcare facilities.



VOLUNTARY LEAD TESTING PROGRAM FOR SCHOOLS AND CHILDCARE FACILITIES

- The Florida Department of Environmental Protection (DEP) established the state's **Voluntary Lead Testing Program for Schools and Childcare Facilities** to coordinate statewide efforts using WIIN grant funds.
- DEP staff worked with multiple stakeholder groups in the planning phase, including the Department of Health (DOH), Department of Children and Families (DCF) and Department of Education (DOE).
- DEP has partnered with the Florida Rural Water Association (FRWA) on implementation of program activities.
 - Production and distribution of educational materials on the health effects of lead in drinking water and guidance from EPA's **3Ts for Reducing Lead in Drinking Water (3Ts)**.
 - Outreach to schools and childcare facilities to increase volunteer participation in the program.
 - Development of sampling plans for sample collection and analysis.
 - Follow up procedures for addressing lead detected in public schools and childcare facilities, including resampling, replacement and other remediation efforts.



FLORIDA'S PROGRAM: FUNDING

- Since the program's inception, DEP has received:
 - Over \$6 million for Florida's program.
 - Has expended \$1.5 million of this total allotment.





FLORIDA'S PROGRAM: OBJECTIVES

- Reduce lead exposure for children and facility staff.
 - Exceedance level = 15 parts per billion (ppb).
- Focus on facilities serving vulnerable populations.
- Establish and leverage sustainable partnerships at the state and local level.
 - Includes experts from health and education sectors; this allows for more efficient use of existing resources and exchange of information.
- Enhance community, parent and teacher cooperation and trust.



WHO QUALIFIES AND HOW IS ASSISTANCE PRIORITIZED IN FLORIDA?

- Which facilities qualify for assistance from Florida's Voluntary Lead Testing in Schools and Childcare Facilities Program?
 - All licensed childcare programs throughout the state.
 - Local educational agencies — elementary and secondary schools.
- Prioritization for program assistance includes several factors:
 - Schools and childcare facilities in low-income communities.
 - Schools and childcare facilities primarily caring for children six years of age or younger.
 - Schools or facilities more likely to contain lead plumbing (e.g., having buildings constructed prior to 1988 or those with evidence of lead plumbing materials).



FLORIDA PROGRAM'S PARTNERS

- DEP partnered with several organizations for assistance with data collection and outreach.
 - DOE.
 - DOH.
 - DCF.
 - FRWA.
- Data collection to identify populations, lists of schools and childcare programs, facilities with at least 50% of children receiving reduced cost school lunches.
- Outreach efforts include presentations, developing written communication materials including flyers and letters and making phone calls.



COMMUNICATION IS KEY

Communication is critical for program success!

- Schools — teachers, staff including maintenance, facility representatives, school district members, students.
- Childcare facilities — teachers/providers, directors, children.
- Parents.
- Partners and stakeholders.



FLORIDA'S PROGRAM: FACILITY BENEFITS

- Reduced lead exposure for children/students and staff.
- Sample collection and analysis performed by a certified lab.
- Educational materials and training on the effects of lead in drinking water.
- Guidance to assist facilities with effective communication with parents and the community.
- Assistance with the development of maintenance and remediation plans.
- Funding for remediation activities that can cover the costs of replacing leaded outlets, plumbing and even service line replacement.



WHAT HAPPENS WHEN AN EXCEEDANCE IS IDENTIFIED?

- **Immediate steps:** shutting off outlets, putting up “do not drink” signs and sharing results.
- **Short-term control measures:** cleaning or replacing filters and aerators, installing point-of-use devices, flushing and providing bottled water.
- **Permanent control measures:** complete fixture replacement, plumbing replacement and lead service line replacement.



PARTICIPATING COUNTIES

AS OF JANUARY 2025

Schools	
Bay	Marion
Brevard	Nassau
Broward	Palm Beach
Columbia	Santa Rosa
Flagler	Seminole
Highlands	Volusia
Indian River	Walton
Lake	

Childcare Facilities		
Bay	Indian River	Osceola
Brevard	Jefferson	Palm Beach
Broward	Lee	Pasco
Calhoun	Leon	Pinellas
Collier	Madison	Polk
Duval	Manatee	Santa Rosa
Franklin	Marion	Sarasota
Gulf	Miami-Dade	Volusia
Hernando	Monroe	Wakulla
Hillsborough	Okaloosa	Walton
Holmes	Orange	Washington

- Counties with **one or more** schools and/or childcare facilities participating in Florida's program as of January 2025.
- This does not necessarily indicate that **ALL** schools or childcare facilities in a county have been sampled.



FLORIDA'S PROGRAM: RESULTS

AS OF FEBRUARY 2025

	Counties	Samples	Facilities
Schools	15 individual counties	35,441	615
Childcare/HeadStart Facilities	33 individual counties	1,740	126
TOTAL	48 total counties	37,181	741

- Counties with both tested school(s) and childcare facility(ies) were included once in the total number of counties participating.



FLORIDA'S PROGRAM: ACHIEVEMENTS

DATA AS OF JANUARY 2025

- Approximately **65-70%** of tested schools and childcare facilities were in low-income communities.
- Approximately **75-80%** of tested schools and childcare facilities primarily serve children six years of age or younger.
- Total population of all schools tested: approximately **333,027**.
- Total population of all childcare facilities tested: approximately **4,332**.
- Samples taken with results above the exceedance level of 15 ppb: **less than 2%**.

Goal: Increase childcare facility participation.



EXCEEDANCES: REMEDIATION EFFORTS

- Approximately **294 of the 574** exceedances identified as of December 2024, through program testing have been resolved; other exceedance locations are in the process of being resolved.
- Remediation efforts included many site-specific options:
 - Resampling for verification of results.
 - Restricted use of sample locations.
 - Sample locations taken out of service.
 - Fixtures removed/replaced (faucets).
 - Sprayers and aerators removed/replaced.
 - Hardware removed/replaced.
 - Water fountains removed/replaced.
 - Epoxy coating to pipes (does not qualify for upcoming remediation funding).



LEAD AND COPPER RULE IMPROVEMENTS

Lead Testing in Schools and Childcare Facilities



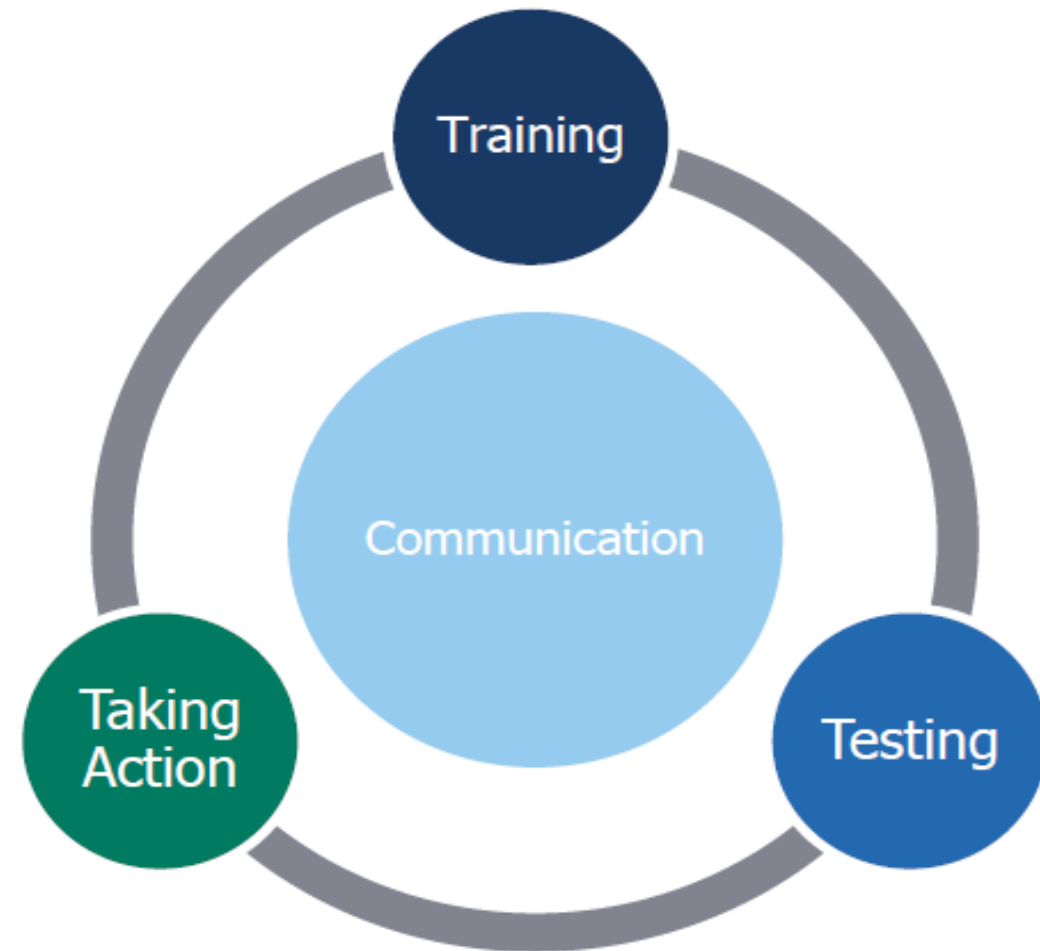
PUBLIC EDUCATION AND SAMPLING REQUIREMENTS

- The Lead and Copper Rule Improvements (LCRI) include public education and sampling requirements for schools and licensed childcare facilities.
- These requirements only apply to community water systems (CWSs).
- The purpose of the requirements is for systems to educate schools and childcare facilities on the risks of lead in their buildings so that they may take voluntary response actions.
- Schools and childcare facilities that are regulated as public water systems (PWSs) are not required to comply with these requirements.



EPA'S 3Ts

- **TRAINING** school and childcare officials to raise awareness of lead in drinking water. Utilize partnerships to develop program plans in an effective manner. Develop a team to provide technical assistance to reach testing objectives. Build a capable workforce to execute testing.
- **TESTING** drinking water in schools and childcare facilities to identify potential problems utilizing the 3Ts guidelines.
- **TAKING ACTION** by developing and implementing a plan to reduce lead contamination in drinking water. Communication with parents, staff and the community.
 - Link to more information on EPA 3Ts: <https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water>.



Source: EPA webinar, May 8, 2019.



EPA'S 3Ts GUIDANCE

WHY IS IT IMPORTANT?

- The 3Ts is a model that provides schools and childcare facilities with information and recommendations about establishing their own sampling programs and mitigating lead risks.
- The 3Ts informed LCRI sampling requirements for schools and childcare facilities.
- CWSs are required to provide the 3Ts guidance to schools and childcare facilities as part of the LCRI public education requirements.



SYSTEMS THAT MUST FOLLOW THE REQUIREMENTS

- All CWSs are required to do public education and lead monitoring at the schools and licensed childcare facilities they serve, unless they meet conditions in the table below.
- These requirements do not apply to non-transient non-community water systems (NTNCWSs), including those that are schools and childcare facilities.

System Type	Applicability	Schools and Childcare Facilities Served by the Water System
CWS	✓	Were constructed and did not have full plumbing replacement before Jan. 1, 2014.
CWS	✓	Are served by a lead, GRR or unknown service line.
CWS	✗	Were constructed or had full plumbing replacement on or after Jan. 1, 2014, and are not served by a lead, GRR or unknown service line.
NTNCWS	✗	N/A



PUBLIC EDUCATION AND OUTREACH

- LCRI requires all CWSs to conduct the following public education and outreach activities:
 - Develop and maintain a list of schools and childcare facilities served.
 - Submit the initial list to DEP by the LCRI compliance date (Nov. 1, 2027).
 - Within five years of Nov. 1, 2027, and at least once every five-year period after, certify in writing to DEP that there are no changes to the list, or submit the revised list.
 - Annually, contact all schools and childcare facilities identified to provide information about the health risks from lead in drinking water and steps consumers can take to reduce their exposure.



SAMPLING PROGRAM NOTIFICATION

CWSs must notify elementary schools, childcare facilities and secondary schools that they are eligible to be sampled for lead by the water system.

Facility Type	Timing	Notification Description
Elementary schools and childcare facilities	During the first five years after Nov. 1, 2027.	<ul style="list-style-type: none">• Notify that they are eligible to be sampled for lead by the water system.• Provide information about sampling for lead in schools and childcare facilities.• Include proposed schedule for sampling at the facility.
Elementary schools and childcare facilities	Starting in the sixth year after Nov. 1, 2027.	<ul style="list-style-type: none">• Notify that they are eligible to be sampled for lead by the water system on request.
Secondary schools	At least once per year starting Nov. 1, 2027.	<ul style="list-style-type: none">• Provide information about sampling for lead in schools and childcare facilities.• Include information on how to request sampling.



LEAD SAMPLING REQUIREMENTS

	Schools	Childcare Facilities
Frequency	<ul style="list-style-type: none"> Elementary: 20% minimum each year for first five years starting Nov. 1, 2027, then upon request. Secondary: upon request only. 	<ul style="list-style-type: none"> 20% minimum each year for the first five years starting on Nov. 1, 2027, then upon request.
Number of Samples	<ul style="list-style-type: none"> Five samples. 	<ul style="list-style-type: none"> Two samples.
Location	<ul style="list-style-type: none"> Two samples at drinking water fountains. One sample at kitchen faucet used for food or drink preparation. One classroom faucet or other outlet used for drinking. One nurse's office faucet, as available. 	<ul style="list-style-type: none"> One at drinking water fountain. One at kitchen faucet used for food or drink preparation OR one classroom faucet or other outlet used for drinking.
Protocol	<ul style="list-style-type: none"> 250-mL first-draw samples from a cold water tap after an eight- to eighteen-hour stagnation period. 	<ul style="list-style-type: none"> 250-mL first-draw samples from a cold water tap after an eight- to eighteen-hour stagnation period.



REQUIREMENTS FOR NEWLY IDENTIFIED SCHOOLS AND CHILDCARE FACILITIES

- A CWS must add a school or childcare facility served to its list when it is identified if it meets the following criteria:
 - Was constructed and did not have full plumbing replacement before Jan. 1, 2024.
 - Is served by a lead, GRR or unknown service line.
- When a water system adds an elementary school or childcare facility to the list, the system is required to conduct outreach at the school/facility prior to conducting sampling.



NON-RESPONSIVE OR DECLINES TO SAMPLING

- Within the first five years following Nov. 1, 2027, all elementary schools and childcare facilities identified must have been sampled once, declined to participate or been determined to be non-responsive.
- A CWS may count a refusal or non-response towards the minimum 20% of elementary schools and childcare facilities it must sample each year during the first five years after Nov. 1, 2027.
- An elementary school or childcare facility may be considered “non-responsive” after the CWS makes at least two separate outreach attempts to contact the facility to schedule sampling and does not receive a response on either attempt.
- CWSs must provide documentation to the state annually by Jan. 30 if an elementary school or childcare facility declines to participate or is non-responsive.



REPORTING REQUIREMENTS

- As soon as practicable but **no later than 30 days** after receipt of the results, CWSs must provide sampling results, regardless of lead sample concentration, to:
 - The sampled school or childcare facility, along with information about potential remediation options (consistent with the 3Ts).
 - The county health department in which the CWS is located.
 - DOH, Bureau of Environmental Health, Water Programs.
 - The DEP district office or approved county health department.



OTHER REPORTING REQUIREMENTS

- In addition to reporting the list of eligible schools and childcare facilities served by the CWS and sampling results, CWSs must submit a report to DEP summarizing the previous year's activities.
- CWSs must submit the report beginning Jan. 30, 2029 and annually thereafter.
- The report must include certifications that the system:
 - Made a good faith effort to identify schools and childcare facilities in its service area.
 - Delivered the required information about health risks from lead in drinking water and steps consumers can take to reduce their lead exposure to the school and childcare facilities that it serves.
 - Completed the notification and sampling requirements for elementary schools, secondary schools and childcare facilities.
 - Provided sampling results to schools, childcare facilities, and the county health department in which the CWS is located and DOH, Bureau of Environmental Health, Water Programs.



OTHER REPORTING REQUIREMENTS (2)

- The report must also include:
 - The number and names of schools and childcare facilities sampled in the previous year.
 - For the first five years after Nov. 1, 2027, starting with the report beginning Jan. 30, 2029, the water system must include:
 - The number and names of the elementary schools and childcare facilities that declined sampling or did not respond to outreach attempts.
 - Information about the outreach attempts that were declined or not responded to by the elementary school or childcare facility.



SAMPLING WAIVERS

- If schools and childcare facilities served by the CWS are sampled for lead in drinking water under a state or local law or program, the state may exempt the CWS from the sampling requirements at those facilities by issuing a written waiver.
- The law or program must be at least as stringent as the LCRI sampling requirements.
- A CWS is eligible for a sampling waiver at all or a subset of schools and childcare facilities they serve if the school or childcare facility is sampled under a state or local law or program if the law or program complies with the eligibility criteria.



APPLICABILITY OF WAIVERS

- For example, if only public elementary schools are required to sample for lead under a state law:
 - The waiver can only be granted to cover those schools.
 - The CWS would be required to conduct the sampling in the remainder of the schools and childcare facilities they serve (e.g., private elementary schools, licensed childcare facilities, and secondary schools).
- Sampling waivers only apply to the lead sampling requirements for schools and childcare facilities.
- CWSs must conduct and cannot waive the annual public education requirements in all schools and childcare facilities, regardless of any facilities that are waived for sampling.



ELIGIBILITY CRITERIA FOR WAIVERS

- Under LCRI, states may grant a waiver to a CWS for schools and childcare facilities sampled under state, local law or program wherein:
 - Sampling meets LCRI frequency requirements **and** sampling meets LCR protocol requirements.
 - Sampling meets LCRI frequency requirements **and** sampling meets LCRI frequency requirements (excluding sample size and stagnation time) **and** remediation actions are required.
 - Sampling is less frequent than once every five years **and** remediation actions are required.
 - Schools or childcare facilities maintains point-of-use devices certified to reduce lead in drinking water on fixtures used for consumption.
 - Sampling is under and complies with the Voluntary School and Childcare Lead Testing and Reduction Grant Program **and** at least the minimum number of samples are collected.



WAIVER ISSUANCE

- DEP can issue waivers at any time given that laws or programs may be established after Nov. 1, 2027.
- DEP can also issue a waiver to a CWS for sampling during the first five years following Nov. 1, 2027, for schools and childcare facilities sampled under a qualifying program between Jan. 1, 2021, and Nov. 1, 2027.



DURATION OF WAIVERS

- The duration of a waiver issued by DEP cannot exceed the sampling period under a qualifying state or local law or program.
 - Example: a program starts on Nov. 1, 2027, and goes through October 2032; the waiver would be effective Nov. 1, 2027, through October 2032.
- If a school or childcare facility is covered under a state law that requires sampling for lead (e.g., all public K-12 schools must sample for lead at all taps used for consumption every three years), a state may grant a waiver for CWSs for sampling in all the public K-12 schools they serve for as long as the state requirement is active.
- The waiver automatically expires at the end of any 12-month period during which the alternative sampling program is not conducted at the required number of schools or childcare facilities.



PUBLIC EDUCATION AND SAMPLING REQUIREMENTS

- **Systems must comply with both the compliance tap sampling and school and childcare facility lead sampling requirements under LCRI.**
- The CWS must also comply with the public education and sampling requirements for schools or childcare facilities that are included in the system's sampling pool for lead and copper compliance tap sampling (90th percentile calculation).
- The requirements for schools and childcare facilities are intended to increase awareness of lead in drinking water in these facilities.
- CWSs **cannot** use the samples collected under the school and childcare facility sampling requirements in the 90th percentile calculation; these are required to be collected under a different protocol.



NEXT STEPS

- CWSs are required to provide the schools and childcare facilities they serve with information about the health risks of leads, steps they can take to reduce their exposure and EPA's 3Ts guidance.
- The 3Ts guidance provides information and best practices for schools and childcare facilities, including recurring sampling at all outlets used for cooking and drinking, and remediation actions to reduce lead in drinking water to the lowest levels possible, noting there is no safe level of lead in drinking water.
- EPA does not currently have the authority under the federal Safe Water Drinking Water Act to establish requirements for schools and childcare facilities that are not PWSs, these schools and facilities are encouraged to take voluntary actions to address lead.
- Resources are available on EPA's website to support sampling and remediation in schools and childcare facilities (www.epa.gov).



THANK YOU

Stacey Odom

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Contact Information:

850-245-8491

Stacey.Odom@FloridaDEP.gov