

Module 3: Planning Your 3Ts Program

Assigning Roles

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You should assign responsibility to a key individual(s) to ensure that testing and follow-up actions are completed. Identify individuals who will likely implement and document the 3Ts Program and who will build a new program at the school or child care facility. A person should also be appointed to serve as the contact person for communication with interested parties (civic groups, the media, etc.). One person or more may be involved in these activities, but it is important to clearly define responsibilities and to support those people in their roles. An effective 3Ts Program will require a team effort. Identifying specific roles and responsibilities before initiating a program will give the program accountability.

Furthermore, by developing team dynamics that include internal communications, you can ensure that the program is successful and that staff turnover will not leave the program without direction or documentation. Whenever possible, get the school and child care administration involved. The superintendent, principal, or school or child care facility director can give the 3Ts Program validity and support the individuals involved, improving the likelihood that their role in the 3Ts Program is integrated with their other job functions.

If you decide to use consultants or certified lab personnel, their roles should be defined and documented with respect to the responsible person(s) at your facility. Contact the state drinking water program or local health department if additional advice is needed on how to identify a qualified consultant.

Identify Key Individuals

The most important people to involve in the planning process for the school's 3Ts Program are those who will be required to approve, support, or fund aspects of the program and those who have current job roles and responsibilities that align with protecting the health of the school or child care facility population. Key stakeholders both within and outside of the school and child care facility system include:

- **Principal/Director.** Include the superintendent if this is a multifacility initiative.
- **Custodial and facilities staff.** These individuals will have in-depth knowledge about plumbing and history and assist in implementing the program (e.g., take water samples).
- **School board.** Those responsible for developing budgets and recommending district-wide initiatives.



- **School nurse.** This individual will have knowledge of overall student health, as well as an awareness of the dangers of lead poisoning and the importance of safe drinking water. This individual may already work with the local health department, be able to identify local laboratories for testing samples, and can also advise parents on how to get their children's blood lead levels tested.
- **Cafeteria staff.** These individuals are aware of water use in food preparation. They can identify the faucets that are regularly used in food or drink preparation, as well as any unused faucets.
- **Athletics staff.** These individuals will know the sources of water used to fill water jugs or those used when teams are practicing or playing games.
- **Students.** Should feel informed and educated on drinking water and know who to go to if they notice an issue.
- **Teachers.** Those affected by lead in drinking water and able to assist with the program. Teachers also might be sources of information on water use (e.g., knowing which fountains are most used). Math and science faculty will have knowledge of volume equations and water quality and could provide assistance during the testing process.
- **Parents.** Advocates for the children in schools and child care facilities.
- **School district wellness committees.** Congressional legislation mandated that schools participating in the National School Lunch Program or other child nutrition programs create school wellness policies (USDA Team Nutrition).
- **Parent Teacher Associations (PTAs).** Student advocacy groups made up of parents and teachers.
- **Local plumbing and construction contractors/suppliers.** Those working on facilities; they should use "lead free" materials and plumbing products certified to be lead free.

Programmatic Questions

Who should create the sampling plan?

It is important to designate a person(s) to serve as a project lead of the sampling program and follow-up activities, even if someone else is hired to conduct testing. You may want to involve consultants, laboratories, or other knowledgeable partners to help develop the plan. You can contact the state, local health department or drinking water program, or water system, to get advice on how to identify a qualified consultant.

Who should collect the samples?

Deciding who will collect samples may be based, in part, on whether the certified laboratory chosen to analyze samples also provides specialists to assist with sample collection. Choosing an individual who is adequately trained (e.g., a consultant or someone from the laboratory) to collect samples may help avoid sampling errors. Ask for references to confirm that individuals are qualified to test for lead in drinking water in schools and child care facilities. Some state drinking water programs or public water systems may provide both services, although there is no federal requirement that they do so.

Will the laboratory take samples, or will it provide training and sample containers for collectors designated by the school or child care facility?

If certified laboratory representatives or consultants are used to conduct testing, ensure that they have experience in conducting lead testing for drinking water at schools and child care facilities. You may wish to ask the laboratory or consultant for references for work they have completed at other schools and child care facilities. Regardless of who is collecting samples, you should ensure the sampler is familiar with the procedures outlined in the Testing Section. You should send the sampler a copy of this document, and any specific testing procedure documents, before sampling is conducted. Testing activities can be misrepresentative if sample collectors do not follow proper sampling procedures. Also, make sure that laboratories or consultants do not confuse the sampling protocol with the lead testing protocol used by public water systems. The two protocols are different.

Who should ensure proper remediation?

If testing results show elevated levels of lead in drinking water, then you should implement remediation measures. Some State programs have additional requirements, such as notification and remediation, if testing results show lead in drinking water above specified levels. If remediation is needed, you should assign a project manager to lead the development of a remediation plan by a qualified professional and to ensure that remediation is properly completed. The Taking Action section, has more information on solutions that you can implement.

Who is in charge of recordkeeping?

Selecting a team member to ensure methods and results are documented is key to building a sustainable program that is not impacted by staff resignation, retirement, or transfer. The person responsible for recordkeeping should work with all other team members to gather information and store it in a centrally accessible place.

Don't forget to maintain a record!

Document your 3Ts Program contacts and the steps your team will take to accomplish the goals set out in your 3Ts Program.

Use the [3Ts Toolkit](#) to identify and record contact information for partners from various organizations and groups described in this section.

