

LEAD TESTING IN SCHOOL AND CHILD CARE PROGRAM DRINKING WATER GRANT

*** STATE SAMPLE ***

2019 Grant Program

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WORK PLAN FOR THE STATE OF NEW FOUNTAIN

Summary Statement

The State of New Fountain Department of Health (DOH) is committed to addressing lead in drinking water in our schools and child care facilities, and overall reduction of childhood lead exposure across our state. This is why, in 2018, Governor Yvonne Davis announced the statewide initiative to test schools and child care facilities using EPA's *3Ts for Reducing Lead in Drinking Water*. Since the start of the *Collaborative Action for Testing H2O Initiative* (the Initiative), we have sampled at 200 schools and taken action at those identified to have elevated lead levels.

With the funding appropriated under section 1464(d) of the Safe Drinking Water Act, amended by the Water Infrastructure Improvement Act (WIIN) section 2107, New Fountain DOH plans to continue the Initiative in testing our schools and child care facilities. This will include the prioritization of facilities serving younger children (ages 6 and under), underserved and low-income communities, and facilities that are older and more likely to contain lead plumbing.

New Fountain DOH is using EPA's 3Ts guidance as a model to: (1) **Communicate**, throughout the implementation of the program, the results and important lead information to the public, parents, teachers, and larger community; (2) **Train** on the risks of lead in drinking water and testing for lead, as well as developing key partnerships to support the program; (3) **Test** using appropriate testing protocols and a certified laboratory; and (4) **Take Action**, including the development of a plan for responding to results of testing conducted and addressing potential elevated lead where necessary.

For more information on previous efforts conducted in New Fountain, please see:

<https://doh.NF.gov/CATHI>

This sample workplan is provided as an example. The contents do not constitute EPA policy or supersede any existing laws, regulations or guidance.

SCOPE OF WORK

This section is a discussion of the New Fountain's plan to develop and implement the lead testing program in schools and child care facilities, *Collaborative Action for Testing H2O Initiative* (also known as the Initiative), and how these programs meet goals as they relate to the reduction of lead in drinking water exposure in children.

The scope of work contained in this project description includes the following categories and information.

- I. STATE GOALS AND PRIORITIES
- II. PROGRAM IMPLEMENTATION AND ACTIVITIES
- III. ROLES AND RESPONSIBILITIES
- IV. TIMELINE AND MILESTONES
- V. WIIN PROGRAMMATIC PRIORITIES AND EPA'S STRATEGIC PLAN LINKAGE
- VI. ANTICIPATED OUTCOMES/OUTPUTS
- VII. BUDGET NARRATIVE

I. STATE/TERRITORY GOALS AND PRIORITIES:

New Fountain has 1,500,060 students enrolled in a total of 3,040 public schools in 800 school districts, and approximately 980,000 children participating in regular daycares at 18,000 facilities. New Fountain DOH has identified goals and priorities consistent the priorities outlined in EPA's State Lead Testing in School and Child Care Program Drinking Water Grant Implementation Document (found here: www.epa.gov/safewater/grants).

In accordance with the America's Waters Infrastructure Act (AWIA) of 2018, which amended the SDWA section 1464(d), New Fountain DOH will assist in voluntary testing for lead contamination in drinking water at schools and child care facilities that are in low-income areas. This is described based upon the affordability criteria established by the State under SDWA section 1452(d)(3). This may include Schools with at least 50% of the children receiving free and reduced lunch and Head Start facilities, for example.

Other priorities will include elementary and child care programs that primarily care for children 6 years and under; older facilities that are more likely to contain lead plumbing (e.g. facilities built before New Fountain's lead ban of 1988); and established and sustainable child care programs without factors indicating that the building may not be serving as a child care facility in the future.

It is New Fountain DOH's goal to reduce lead exposure at these facilities by testing for lead, identifying potential lead sources, and taking action. Using the priorities listed above, this testing effort includes the goals of:

- a. Testing all outlets used for consumption at 35% of all schools and child care facilities in low-income areas by the end of the project period.
- b. Testing all outlets used for consumption at 8% of the total child care facilities in the state with a plan to continue testing after the project period.

- c. Testing all outlets used for consumption at 15% of the total schools in the state with a plan to continue testing after the project period.
- d. Providing education about lead and the importance of testing to all 800 school districts.

II. PROGRAM IMPLEMENTATION AND ACTIVITIES:

New Fountain DOH is utilizing EPA's 3Ts guidance (www.epa.gov/safewater/3ts) to implement the *Collaborative Action for Testing H2O Initiative* (the Initiative). This includes efforts to (1) **Communicate**, throughout the implementation of the program, the results and important lead information to the public, parents, teachers, and larger community; (2) **Train** on the risks of lead in drinking water and testing for lead, as well as developing key partnerships to support the program; (3) **Test** using appropriate testing protocols and a certified laboratory; and (4) **Take Action**, including the development of a plan for responding to results of testing conducted and addressing potential elevated lead where necessary. Below are specific activities included in these key elements:

- a. **Communication:** New Fountain DOH will establish key partnerships to support the program as well as keeping the public informed (see more on partnerships in Appendix A). New Fountain recognizes that timely dissemination of communication materials is of the utmost importance. Therefore, information about the sampling program and lead in drinking water will be shared before the lead in drinking water sampling program begins, after obtaining the results of testing, when/if corrective measures are decided upon (and in the event no corrective measures are appropriate because the lead levels are low), and in response to periodic interest in the program. Specifically:
 - Notifications will occur at least 30 days prior to testing at that facility
 - Testing results will be shared with the school or child care community as soon as possible, but no later than 2 weeks following the receipt of the final results.
 - Press releases and public meetings will be held, in collaboration with school district and child care program leaders, at least once a year.
 - General public education and updates to the testing website will be made on an ongoing basis and can be accessed by the public (<https://.doh.NF.gov/CATHI>).

New Fountain DOH will be using a variety of methods to communicate and be transparent throughout this program with the goal of reaching the target audiences; including: press releases, letters/fliers, mailbox or paycheck stuffers, staff newsletters, presentations, email and websites (<https://.doh.NF.gov/CATHI>), and social media. There will also be a hotline made available for any additional questions or requests for information: 1-800-NFCATHI. In addition, schools and child care facilities will make available, in the administrative offices and on their public website, if applicable, a copy of the results of any voluntary testing.

New Fountain DOH has identified our target audiences as: the school or child care community (e.g. parents, teachers, and staff), the building community, the larger community, local community organizations (e.g. local health officials, environmental health specialists, doctors, and nurses, Lead Poisoning Prevention Programs, and civic and faith-based groups), and the drinking water community (e.g. utilities serving these facilities).

- b. **Training:** Training will include education and training on the risks of lead in drinking water and testing for lead to the community or surrounding residential area that is impacted by testing, as well as key partnerships to support the program (see more on partnerships in Appendix A). New Fountain will also post resources and materials on its website for access by the public. Training will include the causes and health effects of lead in drinking water; as well as training on program plan and sampling procedures.

New Fountain will be working with a third-party contractor, Kara Consulting, Inc., to reach stakeholders and disseminate information.

New Fountain will also be developing key partnerships to support the program and help train staff. These are detailed in Appendix A.

- c. **Testing:** New Fountain DOH is utilizing EPA's 3Ts guidance 2-step sampling protocol, as described at https://www.epa.gov/sites/production/files/2018-09/documents/module_5_3ts_2-step_sampling_protocol_508.pdf, and the New Fountain DOH laboratory, which is certified to test lead in drinking water, to process and analyze samples collected under this program. To reach as many facilities as possible, we will be taking the initial 250 mL first draw sample at each tap and following up with the flush samples at locations identified with elevated lead. Outlets not being tested will be labeled as "not for drinking water." This may include utility sinks and certain bathroom sinks.

New Fountain will be working with the University of New Fountain to develop sampling plans and conduct initial site assessment, as well as collect initial and follow-up flush samples at identified facilities. New Fountain anticipates:

- 1,440 child care facilities to be tested;
- 456 schools to be tested; and
- 10% of the taps to require additional sampling (e.g. follow-up flush sampling).

All sampling efforts under this program will be properly coded and recorded using the coding system and recordkeeping recommendations identified in EPA's 3Ts guidance.

- d. **Taking Action:** New Fountain has developed a plan for responding to results of testing conducted and addressing potential elevated lead where necessary. Responses to results will follow remediation recommendations in the 3Ts guidance. The Initiative includes action at sample sites with results above the state action level of 15 parts per billion (the action level in the federal Lead and Copper Rule). This plan also includes the sampling post-remediation to ensure efforts to reduce lead levels were effective.

Resources that have previously been made available for testing for lead contamination in drinking water in schools of the Juarez and Jester communities will not be replaced by funds provided from this SDWA 1464(d) grant. Grant funding will be used to supplement and enhance existing resources.

III. ROLES AND RESPONSIBILITIES:

A list of roles and responsibilities are listed below, and potential project partners are identified in Appendix A.

<p>3Ts Program Contact: This person will act as the point of contact for your 3Ts Program and help coordinate the communication efforts.</p>	<p>Sarah Bradbury, NF DOH 123 Watertown Rd. Three T, NF 12345 bradburys@doh.nf.gov</p>
<p>Public Communications Team: Communicate testing plans, results, and remediation efforts to the public. The public consists of, but is not limited to, the school community, media outlets, civic groups, etc.</p>	<p><i>Staff, New Fountain DOH</i> with support from health officials to communicate lead exposure risks and options for getting your child’s blood tested.</p>
<p>Public Hotline: This person will monitor the hotline (1-800-NFCATHI) to ensure questions and concerns are being responded to.</p>	<p><i>Staff, New Fountain DOH</i></p>
<p>Website and Social Media Contact: This person will make sure websites (https://doh.NF.gov/CATHI) and social media stay up to date with the latest information.</p>	<p><i>Staff, New Fountain DOH</i> with support from KaraConsulting, Inc.</p>
<p>Partner Liaison Contact: This person will work with certified laboratories, interest groups, the school board, and other partners supporting and interested in the school’s 3Ts Program to schedule activities and maintain communication.</p>	<p><i>Staff, New Fountain DOH</i></p>
<p>Sampling Plan and Execution Contact: This person will lead the effort to develop a sampling plan for the school. They will also engage with other program points of contact and external resources and partners as appropriate.</p>	<p>Michael Gonzalez, NF DOH 123 Watertown Rd. Three T, NF 12345 gonzalezm@doh.nf.gov Leslie Temple, University of NF 321 University Way. Testing, NF 54321 LeslieT@UFN.edu</p>

<p>Remediation Activities Contact: This person will lead the remediation efforts, if necessary, and engage with other program points of contact and external partners as appropriate, acting as the Program point of contact for those resources.</p>	<p>Michael Gonzalez, NF DOH 123 Watertown Rd. Three T, NF 12345 gonzalezm@doh.nf.gov</p> <p>Leslie Temple, University of NF 321 University Way. Testing, NF 54321 LeslieT@UFN.edu</p>
<p>Recordkeeping Contact: Ensure a central repository is created to house all 3Ts Program documents. Lead effort to create, maintain and update documentation with the team annually.</p>	<p><i>Staff, New Fountain DOH and individual grantees.</i></p>

IV. TIMELINE AND MILESTONES:

A detailed timeline for the project, including milestones for specific tasks, can be found below.

- **FY2019 Quarter 4:** Begin assembling program team; publish resources and information on New Fountain webpage; receive funding from federal award agency.
- **FY2020 Quarter 1:** Solicitation of project partners, notification to sub awardees; beginning of public communication about the grant program and training of program personnel; and beginning collection of important information pertaining to sampling (e.g. past sampling activities, records, building construction, building layouts).
 - New Fountain DOH first press release and public meeting.
- **FY2020 Quarter 2:** Continue to develop sample site plans (including any plumbing profiles and/or walk-throughs needed for first set of facilities); notify the school and child care community of plan to sample and important information about lead in drinking water; and begin initial sampling at facilities identified by the priorities listed in the previous section.
- **FY2020 Quarter 3:** Continue to develop sample site plans; notify school and child care community of plan to sample and important information about lead in drinking water; and conduct initial sampling at facilities identified by the priorities listed in the previous section; take action where elevated lead levels are identified; share result of testing as soon as possible but no later than two weeks after receipt of final results; support schools and child care programs in community outreach; conduct follow-up sampling where needed.
 - New Fountain DOH second press release and public meeting.
- **FY2020 Quarter 4:** Conduct initial sampling at facilities identified by the priorities listed in the previous section; take action where elevated lead levels are identified; share results of testing as soon as possible but no later than two weeks after receipt of final results; support schools and child care programs in community outreach; inform sub

awardees on routine practices that can improve water quality (especially as some facilities close and open for summer months).

- **FY2021 Quarter 1:** Continue to develop sample site plans; notify school and child care community of plan to sample and important information about lead in drinking water; and conduct initial sampling at facilities identified by the priorities listed in the previous section; take action where elevated lead levels are identified; share result of testing as soon as possible but no later than two weeks after receipt of final results; support schools and child care programs in community outreach; conduct follow-up sampling where needed.
 - **New Fountain DOH expects to have sampled at 35% of the total schools and child care facilities noted in this workplan by this point.**
- **FY2021 Quarter 2:** Continue to develop sample site plans; notify school and child care community of plan to sample and important information about lead in drinking water; and conduct initial sampling at facilities identified by the priorities listed in the previous section; take action where elevated lead levels are identified; share result of testing as soon as possible but no later than two weeks after receipt of final results; support schools and child care programs in community outreach; conduct follow-up sampling where needed.
- **FY2021 Quarter 3:** Continue to develop sample site plans; notify school and child care community of plan to sample and important information about lead in drinking water; and conduct initial sampling at facilities identified by the priorities listed in the previous section; take action where elevated lead levels are identified; share result of testing as soon as possible but no later than two weeks after receipt of final results; support schools and child care programs in community outreach; inform sub awardees on routine practices that can improve water quality (especially as some facilities close and open for summer months).
- **FY2021 Quarter 4:** Continue to develop sample site plans; notify school and child care community of plan to sample and important information about lead in drinking water; and conduct initial sampling at facilities identified by the priorities listed in the previous section; take action where elevated lead levels are identified; share result of testing as soon as possible but no later than two weeks after receipt of final results; support schools and child care programs in community outreach; conduct follow-up sampling where needed; inform sub awardees on routine practices that can improve water quality (especially as some facilities close and open for summer months).
 - New Fountain DOH third press release and public meeting.
 - **New Fountain DOH expects to have sampled at 100% of the total schools and child care facilities noted in this workplan by this point.**

Additional information will be provided by EPA in the Terms and Conditions for project completion. The project objectives and milestones will align with the terms and conditions as required by the Agency.

V. WIIN PROGRAMMATIC PRIORITIES AND EPA'S STRATEGIC PLAN:

The principal objective of the assistance to be awarded under this program is to provide grants to states to help local education agencies to test schools and child care facilities for lead contamination in drinking water, utilizing EPA's 3Ts guidance or applicable state regulations or guidance that are not less stringent. The objective of the Program is to: (1) Reduce children's exposure to lead in drinking water; (2) Help states target funding toward schools and child care programs unable to pay for testing; (3) Utilize the 3Ts model or model no less stringent to establish best practices for a lead in drinking water prevention program; (4) Foster sustainable partnerships at the state and local level to allow for more efficient use of existing resources and exchange of information among experts in various educational and health sectors; and (5) Enhance community, parent, and teacher cooperation and trust.

The activities described in this workplan support the WIIN Programmatic Priorities and EPA's FY 2018-22 Strategic Plan, Goal 1, "Core Mission: Deliver real results to provide Americans with clean air, land, and water, and ensure chemical safety," Objective 1.2, "Provide for Clean and Safe Drinking Water: Ensure waters are clean through improved water infrastructure and, in partnership with states and tribes, sustainably manage programs to support drinking water, aquatic ecosystems, and recreational, economic, and subsistence activities."

VI. ANTICIPATED OUTCOMES/OUTPUTS:

Outputs and outcomes expected to be achieved under the agreement are described below.

Outputs for this project include: (1) Use the EPA's 3Ts for Reducing Lead in Drinking Water guidance to implement the state program; (2) Development of a state lead testing in drinking water in schools and childcare facilities management strategy that supports a robust training, monitoring, and maintenance plan that protects children from lead exposure now and in the future; (3) Prioritization of testing to target vulnerable communities and populations: schools and child care programs in underserved and/or low-income communities; elementary and child care programs that primarily care for children 6 years and under; and older facilities that are more likely to contain lead plumbing; (4) Providing results of any voluntary testing for lead contamination in school and child care facility drinking water carried out using grant funds and notifying parents, teachers, and organizations of the availability of the results; (5) Developing a regular lead testing program under the Initiative; and (6) Establishment of routine practices such as those outlined in the 3Ts guidance.

Outputs also include the establishment of a memorandum of agreement (MOA) with the University of New Fountain to implement this program.

Outcomes: for this projects include: (1) Schools or child care programs, unable to pay for testing, implementing a testing program and mitigating lead exposure by utilizing the 3Ts toolkit in determining best action to take for remediation; (2) The reduction of children's exposure to lead in drinking water; (3) Improvement of staff and community knowledge on lead in drinking water and other environmental harms; and (5) Water quality improvement and lead exposure

reduction in drinking water; and (6) Establishment of routine practices such as those outlined in the 3Ts guidance.

Other outcomes include: (1) Fostering sustainable partnerships at the state and local level to allow for a more efficient use of resources and the exchange of information among experts in various areas of school, child care, utility, and health sectors; and (2) The enhancement of community, parent, and teacher trust.

VII. BUDGET NARRATIVE:

[This section of the work plan should include a detailed itemized budget proposal (in addition to the Standard Form 424A). Justify the expenses for each of the categories being performed within the grant/project period. Indicate which costs will be paid by the state's or territory's allocation from EPA and which costs will be paid by the state's or territory's voluntary funds, if applicable. Voluntary funds by the state or territory is not a grant requirement. Applicants must itemize costs related to personnel, fringe benefits, travel, equipment, supplies, contractual costs, other direct costs, indirect costs, and total costs.]

View EPA's *Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance*. This interim guidance is a tool that may be used by applicants and recipients of EPA funds when preparing proposed work plans, budgets, and budget narratives for EPA assistance agreements for project grants/cooperative agreements and continuing environmental program (CEP) grants.

Link: <https://www.epa.gov/sites/production/files/2019-05/documents/applicant-budget-development-guidance.pdf>

APPENDIX A: PARTNERS UNDER THIS PROGRAM

Below are partners that will be involved in this program.

The University of New Fountain, Department of Environment Health

321 University Way.
Testing, NF 54321
LeslieT@UFN.edu

KaraConsulting, Inc

567 Remediation Rd.
Testing, NF 54321
Belle@KC.com

The Collation of New Fountain Water Utilities

www.CNFWU.org

Parents for Healthy New Fountain Schools

www.ParentsforHealthyNFSchools.com

Pediatricians of New Fountain Committee

www.PediatriciansofNF.org

Additional Partners will include:

- Local Health Departments
- Water Utilities
- School Principals/Directors
- School board
- School nurse, Cafeteria staff, Athletics staff, and Teachers
- Parents and Parent Teacher Associations (PTAs)
- Local plumbing and construction contractors/suppliers