



# Frequently Asked Questions – LCRI: Monitoring for lead in schools and child care facilities.

*This document will help community water systems (CWSs) understand the public education and sampling requirements for schools and licensed child care facilities under the final Lead and Copper Rule Improvements (LCRI).*

## **Q: Is my CWS required to submit a list of schools and child care facilities to TCEQ?**

A: Yes, all CWSs that serve at least one school or child care facility are required to submit a list of the facilities served within their distribution system unless the following apply:

- The facility was constructed or had full plumbing replacement on or after January 1, 2014, and
- that facility is also not served by lead, galvanized requiring replacement (GRR), or unknown service lines.

## **Q: Does my CWS have to conduct lead monitoring at schools and child care facilities that were recently constructed or have had a full plumbing replacement?**

A: The lead monitoring excludes schools and licensed child care facilities constructed or that had full plumbing replacement on or after January 1, 2014 and that are also not served by a lead, GRR, or unknown service line.

## **Q: What is the compliance date to submit a school and child care list?**

A: The compliance date is November 1, 2027.

**Q: I am a school or child care facility and also a public water system. Do I need to complete these requirements?**

A: Schools and child care facilities that are regulated as PWSs are not required to comply with the public education and sampling requirements because they must fulfill their own sampling requirements.

**Q: I am a CWSs, but do not have any schools or child care facilities within my distribution, do I need to submit a list?**

A: No, a CWS will not be required to provide a list. However, the PWS must certify it does not serve any schools or child care facilities to the TCEQ by November 1, 2027. The CWS must continue to provide annual certifications beginning January 30, 2029.

**Q: What are the public education and outreach requirements?**

A: There are two types of notification requirements.

- CWSs must contact all schools and child care facilities identified by the system to provide information about the health risks from lead in drinking water and steps consumers can take to reduce their exposure.
- CWSs must notify elementary schools, child care facilities, and secondary schools that they are eligible to be sampled for lead by the water system.

**Q: Schools and child care facilities in my distribution participated in the voluntary Lead Testing in School and Child Care program, is my PWS required to sample those facilities?**

A: PWSs may not be required to sample school and child care facilities that have completed sampling under an alternative program. The voluntary Lead Testing in School and Child Care program meets the criteria for an alternative program defined in [40 Code of Federal Regulation 141.92\(h\)\(1\)\(v\)](#). More information about this process will be forthcoming.

**Q: Texas Health and Human Services (HHS) has multiple child care operation types on their website, which ones are required to receive sampling?**

A: Public education and sampling are required at all child care operations regulated by Texas HHS.

**Q: Are CWSs required to provide sampling results after detecting lead in the water?**

A: CWSs are required to provide sampling results as soon as possible (or within 30 days) to the sampled school or child care facility, the local and State health department, and the TCEQ.

**Q: If lead is detected in a school or child care facilities drinking water, who will notify the community? Where can a parent/guardian find sampling results?**

A: Regardless of lead sample concentration, CWSs are required to provide sampling results as soon as possible but no later than 30 days to the sampled school and child care facility, local and state health departments, and TCEQ. CWSs are also required to indicate in their annual Consumer Confidence Report that sampling is being offered at facilities and to inform the public to contact their school or child care facility for more information about sampling results.

**Q: Are CWSs required to provide remediation after detecting lead in the water?**

A: CWSs are required to provide information about potential options to remediate lead consistent with EPA 3Ts guidance.

**Q: If an elementary or child care facility is unresponsive to a CWSs notification to provide lead monitoring in drinking water, is further outreach required?**

A: CWSs are required to make two separate outreach attempts to each school and child care facility to provide public education and lead monitoring. Systems must provide documentation to the TCEQ about attempts that were declined or not responded to.

**Q: Where are samples collected at school and child care facilities?**

A: Five samples must be collected from schools at two drinking water fountains, one kitchen faucet used for drinking or cooking, one classroom faucet (or other used for human consumption), and one nurse's office faucet, as available. Two samples must be collected from child care facilities at one drinking water fountain, and one kitchen faucet used for drinking or cooking (or one classroom faucet or other outlet used to provide water for human consumption). All samples must be collected from the cold water tap at each outlet.

**Q: What if the facilities do not have these sample locations?**

A: If any school or child care facility has fewer than the required number of outlets, the CWS must collect samples at all outlets used to provide water for human consumption.

**Q: What is the lead sampling protocol at schools and child care facilities?**

A: Lead samples must be first-draw samples, 250 mL in volume, the water must have remained stationary in the plumbing system of the sampling site (building) for at least 8 but no more than 18 hours, and samples must be analyzed using acidification and the corresponding analytical methods in [40 Code of Federal Regulation 141.89 Analytical Methods](#). Please note that the sample volume is different for schools and child care facilities than what is required for regular lead tap monitoring, which is 1 Liter.

**Q: What are the requirements for newly identified schools and child care facilities?**

A: Schools and child care facilities served by the CWS that were constructed and did not have full plumbing replacement before January 1, 2024 and are served by a lead, GRR, or an unknown service line must be included in the list of schools and child care facilities maintained by the system when they are identified. When a water system adds an elementary school or child care facility to the list, the system must conduct outreach at those elementary schools and child care facilities prior to conducting sampling.

**Q: Are there other reporting requirements?**

A: Yes. In addition to reporting the list of eligible schools and child care facilities served by the CWS and sampling results, CWSs must submit a report to the TCEQ summarizing the previous year's activities. CWSs must submit this report beginning January 30, 2029 and annually thereafter.

**Q: If a CWS already collects compliance lead and copper tap samples at a school for use in the 90th percentile level calculation, does the system need to comply with the public education and sampling requirements for schools and child care facilities for this school?**

A: Yes. If a school or child care facility is included in the sampling pool for lead and copper compliance tap sampling, the CWS must also comply with the public education and sampling requirements for schools and child care facilities at that facility. Systems must comply with both the compliance tap sampling and school and child care facility lead sampling requirements under LCRI, as applicable. The requirements for schools and child care facilities are intended to increase awareness of lead in drinking water in these facilities. CWSs cannot use the samples collected under the school and child care facility sampling requirements in the 90th percentile calculation because they must be collected using a different sample procedure.

**Q: Why are the [EPA 3Ts](#) important?**

A: The 3Ts are important guidance documents and tools provided by the EPA that include information and recommendations to prepare schools, child care facilities, and states to build a voluntary implementation program to reduce lead levels in drinking water. The 3Ts guidance provides information and best practices for schools and child care 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.