



FY 2020-2021 Agency Priority Goal Action Plan

Reduce Childhood Lead Exposures and Associated Health Impacts

Goal Leader:

Amanda Kasper, Special Advisor to the Administrator, Office of the Administrator

Deputy Goal Leader:

Angela Hackel, Senior Advisor, Office of the Administrator/Office of Public Affairs

Overview (continued)

Goal Statement

- **Reduce childhood lead exposures and associated health impacts.** By September 30, 2021, EPA will: establish drinking water lead testing programs for schools in all states and the District of Columbia; reduce the number of lead nonattainment areas to 10 from a baseline of 13; complete 48 cleanup actions at sites where lead is a contaminant of concern; and increase the recertification rate of lead-based paint renovation, repair and painting firms to 28 percent from a baseline of 23 percent.

Challenge

- Lead exposure to children can result from multiple sources and can cause irreversible and life-long health effects. No safe blood lead level in children has been identified. Even low levels of lead in blood have been shown to affect IQ, ability to pay attention and academic achievement. Some challenges related to activities EPA is currently conducting to reduce lead exposure to children include:
 - **Drinking Water Lead Testing Programs for Schools:** Lead can enter drinking water when plumbing materials that contain lead corrode, especially where the water has high acidity or low mineral content that corrodes pipes and fixtures. The most common sources of lead in drinking water are lead pipes, faucets, and fixtures. While the Safe Drinking Water Act (SDWA) requires lead testing for schools that have their own water supply, there are approximately 98,000 public schools and 500,000 child care facilities that receive their drinking water from a regulated public water system but are not themselves directly regulated under SDWA. These schools and child care facilities may or may not be conducting independent drinking water quality testing and often lack resources and training needed to develop and implement drinking water programs.
 - **Lead Nonattainment Areas:** EPA's authority to approve a state's request to redesignate lead nonattainment areas hinges on the state meeting the minimum requirements of the Clean Air Act (CAA) and initiating the redesignation process demanding time and resources from states, which may be limited for such purposes. (For more information on EPA's nonattainment challenges, see *EPA's FY 2020-2021 APG for Reducing the Number of Nonattainment Areas*).
 - **Sites Where Lead is a Contaminant of Concern:** Lead is a common contaminant in all parts of our environment. Testing and removing lead from contaminated soils can be a complex process. Lead can be a relatively common soil contaminant because of past and current human activity or industrial uses (e.g. smelters) and natural occurrence. The Superfund program's approach is to develop site-specific cleanup levels which accounts for total exposure to lead at a site. Almost 900 Superfund National Priorities List and Superfund Alternative Approach sites identified lead

Overview (continued)

as a contaminant of concern potentially exposing children in communities across the country. Young children often have higher rates of soil and dust ingestion due to crawling and hand/object to mouth contact.

- **Lead-Based Paint Firm Recertifications:** The rate of firm recertifications has declined since the initial year of program implementation in 2010, when extensive outreach and publicity surrounding the Renovation, Repair, and Painting (RRP) regulation brought in a large number of applicants for firm certification. Firm certifications expire every five years, and the rate of firm recertifications has averaged 23% since FY 2017, while the total number of new firms in a quarter seeking certification has remained constant. The total number of firms certified to conduct lead-safe work practices in target housing and child-occupied facilities will trend downward at a higher rate beginning in 2020 and continuing through 2021.

Opportunity

- EPA is implementing the [*Federal Action Plan to Reduce Childhood Lead Exposures and Associated Health Impacts*](#) (Action Plan). The Action Plan, which was released in December 2018, is a product of the President's Task Force on Environmental Health Risks and Safety Risks to Children, which the EPA Administrator co-chairs, along with the Secretary of the Department of Health and Human Services. The Action Plan is a blueprint for reducing lead exposures and associated harms through collaboration among 17 federal agencies with a range of stakeholders, including states, tribes and local communities, along with businesses, property owners and parents. Some of EPA's actions in support of the Action Plan include:
 - **Increase Drinking Water Lead Testing Programs for Schools:** Provide funding to states to establish or expand school testing programs through the Lead Testing in Schools and Child Care Programs Drinking Water grant. EPA released implementation guidance during the summer of 2019. Under this grant program, states will establish or expand programs for schools and child care facilities to test drinking water for lead.
 - **Reduce Number of Lead Nonattainment Areas:** Maintain regular communication between EPA regional offices and air agencies to discuss lead area redesignation requests and identify solutions to challenges and/or disincentives that may create barriers for states to request a lead area redesignation.
 - **Complete Cleanup Actions at Sites Where Lead is a Contaminant of Concern:** Continue to reduce childhood exposures to lead in soil through removal and remedial actions at contaminated sites while working with other federal, state, tribal and local partners to identify ways to protect the public's health.

Overview (continued)

- **Increase the Rate of Lead-Based Paint Firm Recertifications:** Increase the rate of firm recertifications under the RRP Program through outreach to firms whose certifications are expiring. Firms certified to conduct lead-safe work practices protect children from lead-based paint hazards by using these practices to reduce dust lead levels associated with renovation, repair and painting activities that disturb lead-based paint in target housing and child-occupied facilities.

Leadership & Implementation Team

Goal Leader:

Amanda Kasper

Special Advisor to the Administrator, Office of
the Administrator

Deputy Goal Leader:

Angela Hackel

Senior Advisor, Office of the Administrator/Office of Public Affairs

Contributing EPA Programs for Federal Lead Action Plan:

Office of Air and Radiation

Office of Water

Office of Chemical Safety and Pollution Prevention

Office of Land and Emergency Response

Goal Structure and Strategies

Strategy 1 – Increase Drinking Water Lead Testing Programs for Schools:

- Promote EPA’s Lead Testing in Schools and Child Care Programs Drinking Water grant program to establish or expand lead testing in schools and child care facilities.
- Identify challenges and provide training and assistance to implement lead in drinking water testing programs.
- Leverage partnerships that support the use of the Training, Testing, and Taking Action (3Ts) toolkits that provide tools for schools, child care facilities, states and water systems to implement voluntary lead in drinking water testing programs.

Strategy 2 – Reduce Number of Lead Nonattainment Areas:

- Work with state, local and tribal air agencies to facilitate submittal of lead area redesignation requests, as appropriate. (For more information on EPA’s nonattainment strategy, see *EPA’s FY 2020-2021 APG for Reducing the Number of Nonattainment Areas.*)

Strategy 3 – Complete Cleanup Actions at Sites Where Lead is a Contaminant of Concern:

- Complete removal and remedial actions at contaminated sites to reduce lead soil exposures to the most sensitive community residents.
- Support evaluation of lead exposure at contaminated sites and identify research or other opportunities to improve the Agency’s understanding of the degree to which Superfund cleanups may lower blood lead levels.
- Work with tribal, state and local partners in community outreach and education to reduce lead exposure to sensitive populations at risk (e.g., children and women of childbearing age).

Strategy 4 – Increase the Rate of Lead-Based Paint Firm Recertifications:

- Each month:
 - Send reminder emails to lead-based paint RRP firms six months prior to expiration of their certification; and
 - Send reminder emails to RRP firms two months prior to the expiration of their certification.
- Each quarter:
 - Mail reminder post cards to RRP firms whose certification expiration will occur during the quarter; and
 - Mail expiration post cards to RRP firms whose certification expired the previous quarter.

Summary of Progress — FY 2020 Q1

EPA exceeded the FY 2020 Q1 targets for all four key indicators.

Indicator	Jumping Off Point		FY 2020 Q1	FY 2020 Q2	FY 2020 Q3	FY 2020 Q4	FY 2021 Q1	FY 2021 Q2	FY 2021 Q3	FY 2021 Q4	Pref Dir	Trend
Number of state programs for drinking water lead testing for schools	0	Target	0	10	30	45	51	51	51	51	↑	
		Actual	43									
Number of lead nonattainment areas	13	Target	13	12	11	11	11	11	11	10	↓	
		Actual	12									
Number of lead cleanup actions	0	Target	3	7	14	24	26	28	34	48	↑	
		Actual	8									
Rate of lead-based paint firm recertifications	23%	Target	23.0%	23.7%	24.4%	25.1%	25.8%	26.5%	27.2%	28.0%	↑	
		Actual	24.0%									

Accomplishments:

Strategy 1 – Increase Drinking Water Lead Testing Programs for Schools

- EPA awarded Lead Testing in Schools and Child Care Program Drinking Water grants to 43 states which will assist local educational agencies in voluntary testing for lead contamination in drinking water at schools and child care programs.

Strategy 2 – Reduce Number of Lead Nonattainment Areas

- EPA reduced the number of lead nonattainment areas to 12 as of FY 2020 Q1, exceeding the target of 13. Specific actions that occurred in FY 2020, Q1 (including the exceeded target above), that advanced EPA toward achieving the APG include:
 - EPA acted on redesignation requests submitted by their respective states; and
 - EPA continues to encourage states with nonattainment areas that have attaining air quality to develop approvable maintenance plans and submit redesignation requests.

Strategy 3 – Complete Cleanup Actions at Sites Where Lead is a Contaminant of Concern:

- During this quarter EPA completed a total of eight cleanup actions to address lead in soils, including: one remedial action project at a federal facility; and seven removal actions at non-federal facility sites.

Summary of Progress – FY 2020 Q1 (continued)

Strategy 4 – Increase the Rate of Lead-Based Paint Firm Recertifications

- Rate of lead-based paint firm recertification exceeded Q1 target in part due to implementation of enhanced outreach and education efforts which include reminder emails and post card mailings to RRP firms with expiring certifications.

Challenges:

Strategy 1 – Increase Drinking Water Lead Testing Programs for Schools

- None identified during the Q1 performance review.

Strategy 2 – Reduce Number of Lead Nonattainment Areas

- None identified during the Q1 performance review.

Strategy 3 – Complete Cleanup Actions at Sites Where Lead is a Contaminant of Concern:

- None identified during the Q1 performance review.

Strategy 4– Increase the Rate of Lead-Based Paint Firm Recertifications

- None identified during the Q1 performance review.

Summary of Progress — FY 2020 Q2

EPA met or exceeded the FY 2020 Q2 targets for all four key indicators.

Indicator	Jumping Off Point		FY 2020 Q1	FY 2020 Q2	FY 2020 Q3	FY 2020 Q4	FY 2021 Q1	FY 2021 Q2	FY 2021 Q3	FY 2021 Q4	Pref Dir	Trend
Number of state programs for drinking water lead testing for schools	0	Target	0	10	30	45	51	51	51	51	↑	
		Actual	43	45								
Number of lead nonattainment areas	13	Target	13	12	11	11	11	11	11	10	↓	
		Actual	12	12								
Number of lead cleanup actions	0	Target	3	7	14	24	26	28	34	48	↑	
		Actual	8	14								
Rate of lead-based paint firm recertifications	23%	Target	23.0%	23.7%	24.4%	25.1%	25.8%	26.5%	27.2%	28.0%	↑	
		Actual	24.0%	42.0%								

Accomplishments:

Strategy 1 – Increase Drinking Water Lead Testing Programs for Schools

- EPA has awarded Lead Testing in Schools and Child Care Program Drinking Water grants to 45 states which will assist local educational agencies in voluntary testing for lead contamination in drinking water at schools and child care programs.
- EPA signed the [Memorandum of Understanding on Reducing Lead Levels in Drinking Water in Schools and Child Care Facilities](#) with more than a dozen partners across the government and private sector to focus attention on testing for lead in drinking water for schools and child care facilities.
- FY 2020 funding allotment was announced to continue the expansion of state programs to reach more schools or child care facilities.

Strategy 2 – Reduce Number of Lead Nonattainment Areas

- EPA maintained the number of lead nonattainment areas at 12 as of FY 2020 Q2, meeting the target of 12.
- EPA continues to encourage states with lead nonattainment areas that have attaining air quality to develop approvable maintenance plans and submit redesignation requests.

Strategy 3 – Complete Cleanup Actions at Sites Where Lead is a Contaminant of Concern:

- During this quarter EPA completed a total of six cleanup actions to address lead in soils, including: two remedial action projects at non-federal facility sites; two remedial action projects at federal facility sites; and two removal actions at non-federal facility sites. Year-to-date, EPA has completed 14 total clean up actions to address lead in soil.

Summary of Progress — FY 2020 Q2 (continued)

Strategy 4 – Increase the Rate of Lead-Based Paint Firm Recertifications

- Rate of lead-based paint firm recertification exceeded Q2 target in part due to implementation of enhanced outreach and education efforts which include reminder emails and post card mailings to RRP firms with expiring certifications.

Challenges:

Strategy 1 – Increase Drinking Water Lead Testing Programs for Schools

- Due to the challenges presented by COVID-19 to recipients and applicants of Federal Financial Assistance, EPA's Office of Grants and Debarment (OGD) released an external COVID-19 general grants guidance in March 2020 addressing OMB Memo: M-20-17 "Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations." EPA's guidance is accompanied by a Recipient/Applicant Information Notice (RAIN) to alert the public of the flexibilities to applicants/grantees experiencing challenges related to COVID-19, including extensions to reporting requirements. This may have an impact on upcoming milestones.

Strategy 2 – Reduce Number of Lead Nonattainment Areas

- None identified during the Q2 performance review.

Strategy 3 – Complete Cleanup Actions at Sites Where Lead is a Contaminant of Concern:

- None identified during the Q2 performance review.

Strategy 4– Increase the Rate of Lead-Based Paint Firm Recertifications

- None identified during the Q2 performance review.

Key Milestones

Strategy 1 – Increase Drinking Water Lead Testing for Schools

Key Milestones	Due Date	Status	Change from Last Quarter	Comments
Award grants to all 51 applicants	Q1/FY 2021	On Track	N/A	45 grants have been awarded as of FY 2020 Q2.
Host webinars on the implementation of the grant and how to leverage partnership that supports the use of the 3T toolkit	Q3/FY 2020	Not Yet Started	N/A	Q3: Host webinar by 4/30/2020 on 3Ts and Updates to WIIN Grant Program.
All grantees submit annual reports	Q1/FY 2021	Not Yet Started	N/A	Standard grant reporting requirements are noted in the terms and conditions of the grant award package. Due to the impact of COVID-19, EPA will provide awardees with an extension if requested to report on quarterly program progress for FY 2020 Q2.

Strategy 2 – Reduce Number of Lead Nonattainment Areas¹

Key Milestones	Due Date	Status	Change from Last Quarter	Comments
Take action on lead area redesignation requests and maintenance plans as appropriate	Quarterly	On Track	N/A	EPA took action on one lead area redesignation request in FY 2020 Q1.

Strategy 3 – Take Action to Clean Up Lead at Superfund Sites

Key Milestones	Due Date	Status	Change from Last Quarter	Comments
Increase by 2021 the number of cleanup actions completed with lead as a contaminant of concern	Q4/FY 2021	Ongoing	N/A	EPA exceeded the targets for FY 2020 Q1 and Q2.
Outreach to regional offices to review and track ongoing remedial cleanup actions to determine which have lead as a contaminant addressed by the cleanup	Q3/FY 2020	On Track	N/A	Effort was initiated in FY 2020 Q1 and will be complete in Q3.

¹ For more information on implementing Strategy 2, see EPA's FY 2020-2021 APG for Reducing the Number of Nonattainment Areas.

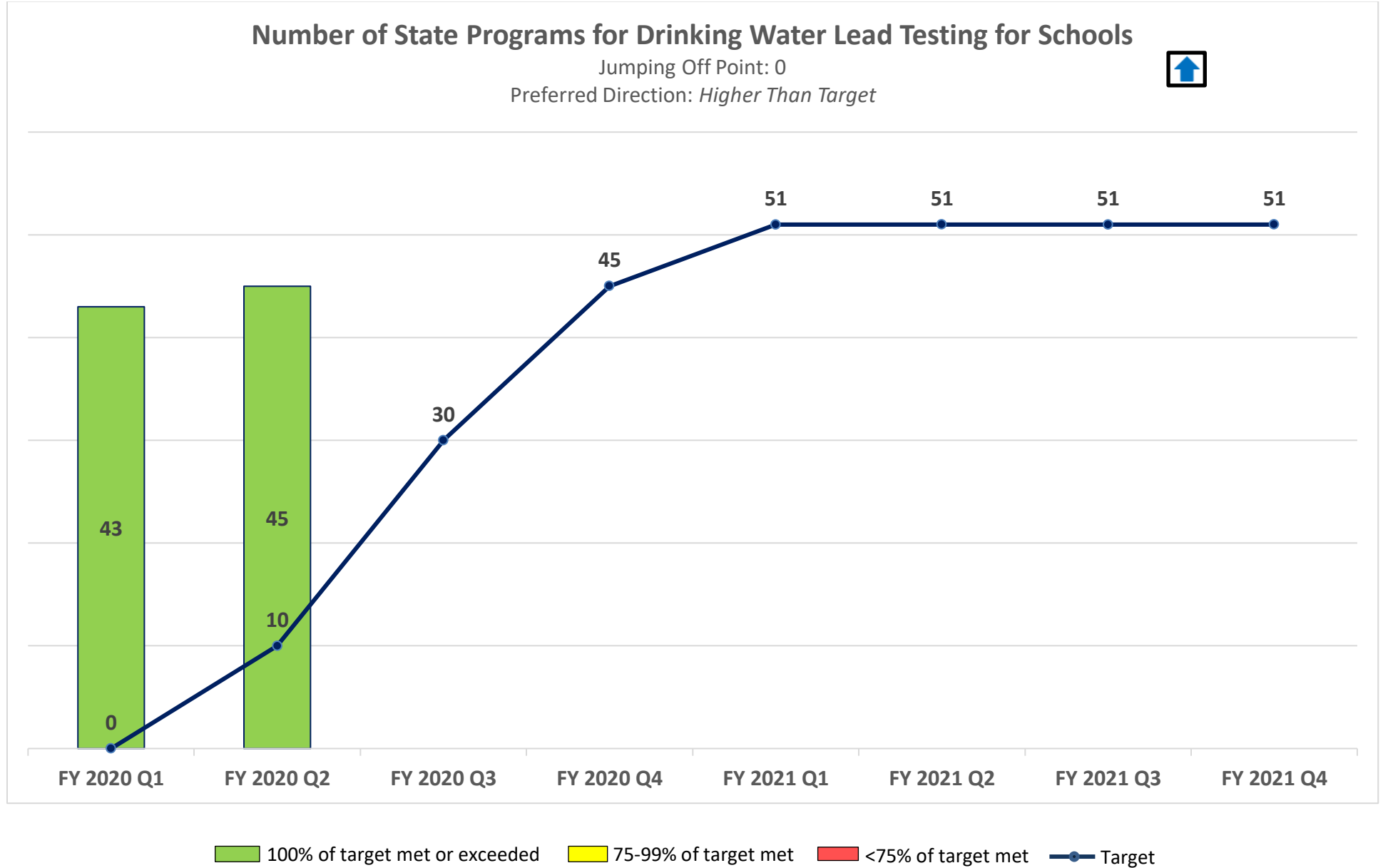
Key Milestones (continued)

Distribute outreach materials to regions gathered through the Interagency Task Force (www.epa.gov/superfund/superfund-task-force)	Q3/FY 2020	On Track		
Continue the peer review and publication process for research conducted by EPA's National Center for Environmental Economics and Office of Land and Emergency Management on the relationship between proximity to Superfund cleanups and rates of elevated Blood Lead Levels	Q4/FY 2021	Complete	N/A	Research was published in the peer-reviewed March 2020 issue of the Journal of Environmental Economics and Management: https://doi.org/10.1016/j.jeem.2019.102289 . Results from this analysis of over one million children's blood lead level measurements across six states over two decades indicate that cleanup at lead contaminated Superfund sites lowered the risk of elevated blood lead levels for children living within two kilometers of the sites by 13 to 26 percent.

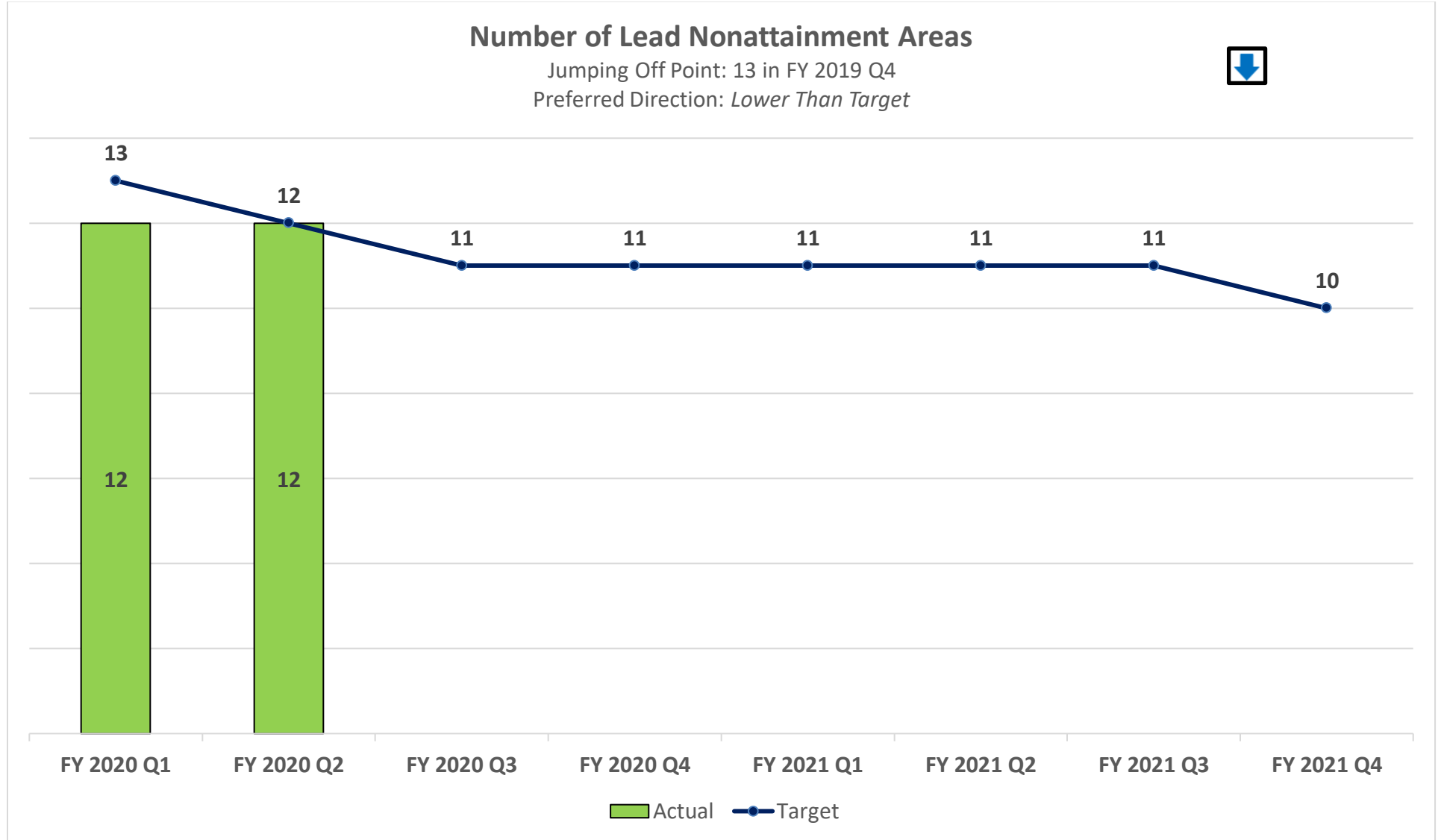
Strategy 4 – Increase Lead-based Paint Firm Recertifications

Key Milestones	Due Date	Status	Change from Last Quarter	Comments
Send monthly reminder emails to RRP firms six months prior to expiration of their certification and two months prior to the expiration of their certification	Quarterly	On Track	N/A	
Send reminder post cards to RRP firms whose certification expiration falls in the current quarter	Quarterly	On Track	N/A	
Send expiration post cards to RRP firms whose certification expired in the previous quarter	Quarterly	On Track	N/A	

Key Indicators

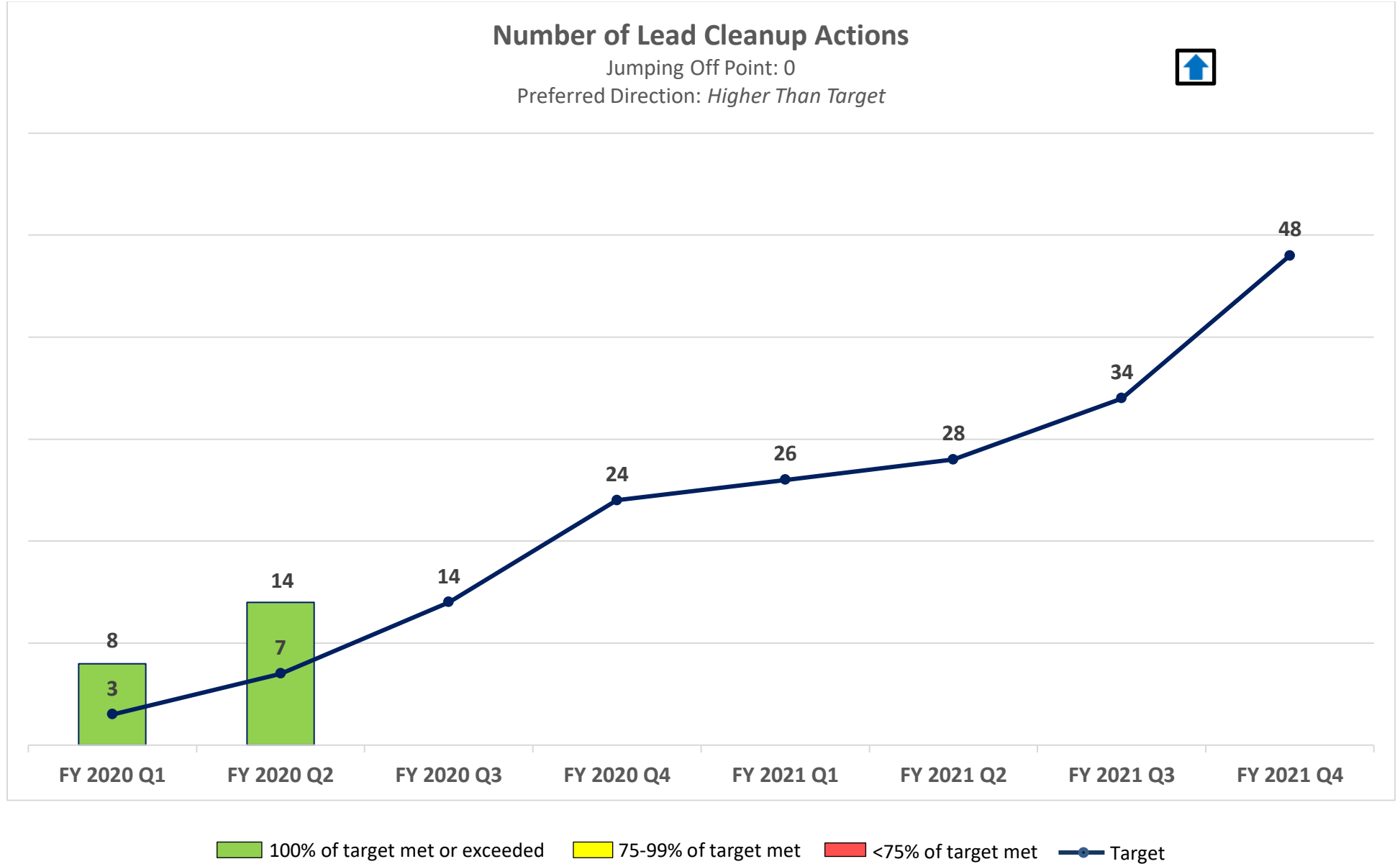


Key Indicators (continued)

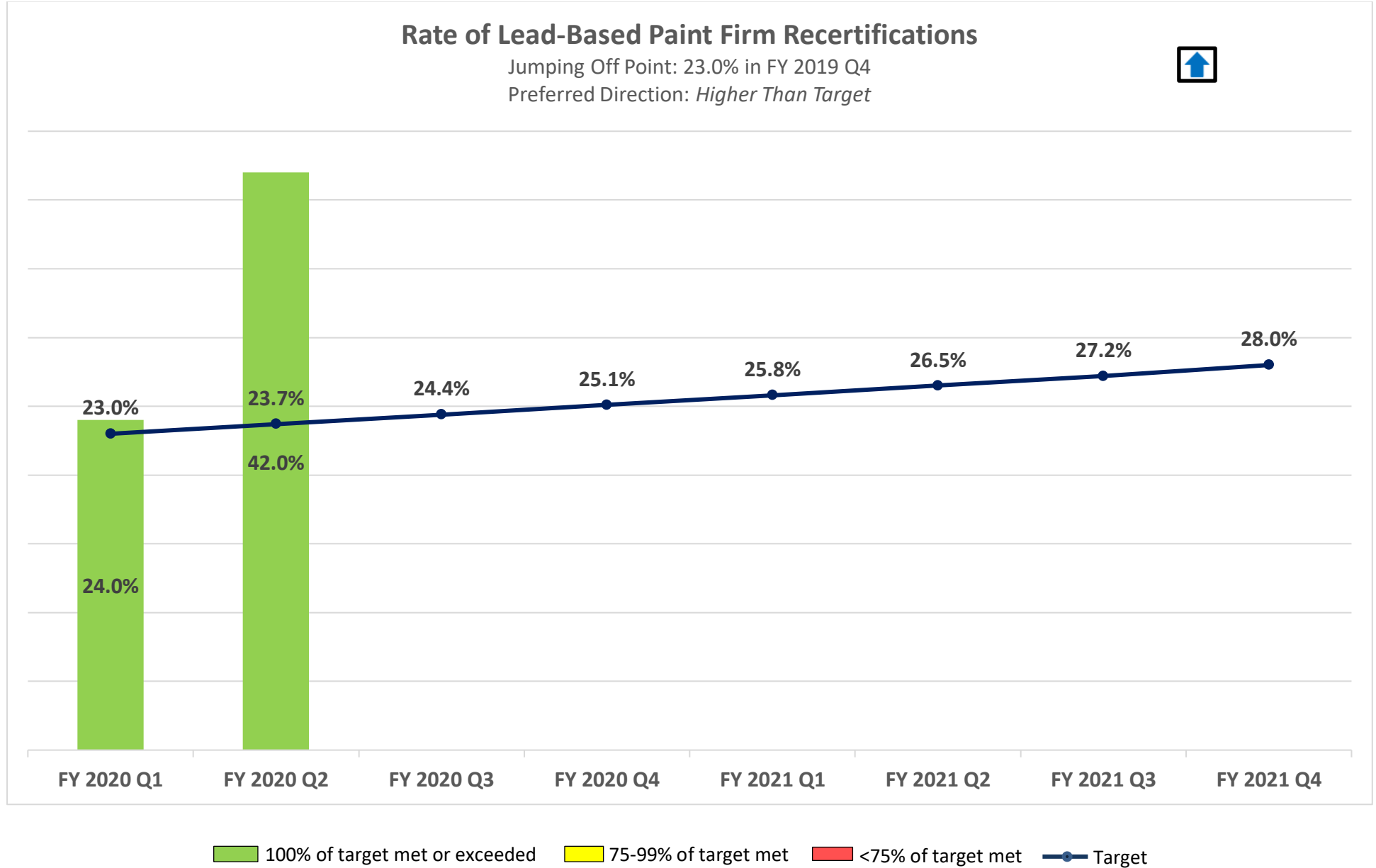


100% of target met or exceeded 75-99% of target met <75% of target met Target

Key Indicators (continued)



Key Indicators (continued)



Data Accuracy and Reliability

- **Establish Drinking Water Lead Testing Programs in Schools:** EPA will award grants and use required reports from the grantees to validate progress. The statute requires recipients to follow the 3Ts for Reducing Lead in Drinking Water (3Ts) or “applicable State regulations or guidance regarding reducing lead in drinking water in schools and child care programs that are not less stringent than the guidance.” In 2018, EPA updated the 3Ts and released the 3Ts toolkit, available at: www.epa.gov/safewater/3Ts.
- **Reduce Number of Lead Nonattainment Areas:** See EPA’s *FY 2020-2021 APG for Reducing the Number of Nonattainment Areas* for more information on nonattainment data accuracy and availability.
- **Complete Cleanup Actions at Sites Where Lead is a Contaminant of Concern:**
 - EPA regional offices report cleanup action data to systems administered by the Superfund Program, which includes information on Superfund site remediations, removals and federal facility cleanups.
 - EPA’s authority and control over contaminated sites varies depending on the statutory authority under which the site is being addressed.
 - The Superfund Program provides information to the public on the EPA website at: <https://www.epa.gov/leadactionplanimplementation>.
 - Contact information for Superfund data coordinators in each regional office is available on the EPA website at: <https://www.epa.gov/superfund/epa-regional-superfund-community-involvement-contacts>.
 - Cleanup actions include: remedial actions at Superfund remedial sites (including both National Priorities List sites and Superfund Alternative Approach sites); remedial actions at Superfund federal facility sites that are on the National Priorities List; and removal actions including Superfund emergency, time critical, non-time critical actions.
- **Increase the Rate of Lead-Based Paint Firm Recertifications:** EPA processes and records all applications for firm recertifications in the Agency’s Federal Lead-Based Paint Program database. The rate of recertification is calculated by dividing the total number of firms that applied for recertification in a quarter by the total number of firm certifications expiring in a quarter.

Additional Information

Contributing Programs

- Office of Water (OW) – *EPA's Lead Testing in Schools and Child Care Programs Drinking Water Grant Program*: Section 2107 of the Water Infrastructure Improvements for the Nation (WIIN) Act establishes the Lead Testing in School and Child Care Program Drinking Water grant to award funding to states and tribes to "assist local and tribal educational agencies in voluntary testing for lead contamination in drinking water at schools and child care programs."
- Office of Air and Radiation (OAR) – See EPA's *FY 2020-2021 APG for Reducing the Number of Nonattainment Areas* for more information on nonattainment contributing programs.
- Office of Land and Emergency Management (OLEM) – The Superfund (SF Remedial), Federal Facilities Restoration and Reuse (FFRRO) and the Emergency Response (SF Removal) Programs contribute to this goal. These programs collaborate with EPA's Office of Enforcement and Compliance Assurance (OECA) to deliver environmental results.
- Office of Chemical Safety and Pollution Prevention (OCSP) – EPA's Lead Renovation, Repair, and Painting (RRP) Program is administered by the Office of Pollution Prevention and Toxics' (OPPT) National Program Chemicals Division (NPCD).

Other Federal Agencies / Stakeholder / Congressional Consultations

- **3Ts (Training, Testing, and Taking Action) Memorandum of Understanding**: In October 2019, EPA signed the [Memorandum of Understanding \(MOU\) on Reducing Lead Levels in Drinking Water in Schools and Child Care Facilities](#), which represents an unprecedented partnership to focus attention on testing for lead in drinking water for schools and child care facilities between:
 - [U.S. Environmental Protection Agency, Office of Water](#)
 - [U.S. Department of Agriculture, Rural Development Agency](#)
 - [U.S. Department of Education, Office of Safe and Supportive Schools](#)
 - [U.S. Department of Health and Human Services, Centers for Disease Control and Prevention](#)
 - [U.S. Department of Health and Human Services, Indian Health Service](#)
 - [U.S. Department of Health and Human Services, Agency for Children and Families' Office of Head Start and Office of Early Childhood Development](#)
 - [U.S. Department of the Interior, Bureau of Indian Affairs and Bureau of Indian Education](#)
 - [American Water Works Association](#)
 - [American School Health Association](#)
 - [Association of Metropolitan Water Agencies](#)
 - [Association of State Drinking Water Administrators](#)

Additional Information (continued)

- [Inter Tribal Council of Arizona, Inc.](#)
- [National Association of Water Companies](#)
- [National Rural Water Association](#)
- [Rural Community Assistance Partnership](#)
- [United South and Eastern Tribes](#)
- The signatories have agreed to encourage schools and child care facilities to test drinking water for lead, communicate results, and take steps to reduce lead in drinking water. The signatories also agree to encourage public water systems to assist schools and child care facilities in understanding and reducing lead exposure from drinking water.
- EPA also works in concert with the states, tribes, local governments and other federal agencies. For example, some states are authorized to operate cleanup programs, while others are partners. Where other federal agencies are designated as the lead for the cleanup actions at their sites, EPA's environmental cleanup goals are subject to, and reliant on, the lead federal agencies' cleanup budgets, execution, and site cleanup performance.
- Federal Action Plan to Reduce Childhood Lead Exposures and Associated Health Impacts:
 - U.S. Consumer Product Safety Commission www.cpsc.gov
 - U.S. Department of Agriculture www.usda.gov
 - U.S. Department of Education www.ed.gov
 - U.S. Department of Energy www.energy.gov
 - U.S. Department of Health and Human Services www.hhs.gov
 - U.S. Department of Homeland Security www.dhs.gov
 - U.S. Department of Housing and Urban Development www.hud.gov
 - U.S. Department of Justice www.justice.gov
 - U.S. Department of Labor www.dol.gov
 - U.S. Department of Transportation www.transportation.gov
 - U.S. Environmental Protection Agency www.epa.gov
 - Council of Economic Advisers www.whitehouse.gov/administration/eop/cea
 - Council on Environmental Quality www.whitehouse.gov/administration/eop/ceq
 - Domestic Policy Council www.whitehouse.gov
 - National Economic Policy Council www.whitehouse.gov
 - Office of Management and Budget www.whitehouse.gov/omb
 - Office of Science and Technology Policy www.whitehouse.gov/administration/eop/ostp