 FY 2020-2021 Agency Priority Goal Action Plan

Reduce Childhood Lead Exposures and Associated Health Impacts

Goal Leader:
Amanda Kasper, Senior Advisor to the Administrator, Office of the Administrator

Deputy Goal Leader:
Angela Hackel, Senior Advisor, Office of the Administrator/Office of Public Affairs
Overview

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 Approach sites identified lead
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.
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
Senior 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 Management
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.

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

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 12 cleanup actions to address lead in soils, including: two remedial action projects and ten removal actions (FY 2020 Q1 result updated from 10 to 12 in FY 2020 Q4).
Summary of Progress – FY 2020 Q1 (continued)

Strategy 4 – Increase the Rate of Lead-Based Paint Firm Recertifications
  o 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
  o None identified during the Q1 performance review.

Strategy 2 – Reduce Number of Lead Nonattainment Areas
  o None identified during the Q1 performance review.

Strategy 3 – Complete Cleanup Actions at Sites Where Lead is a Contaminant of Concern:
  o None identified during the Q1 performance review.

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

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Jumping Off Point</th>
<th>FY 2020 Q1</th>
<th>FY 2020 Q2</th>
<th>FY 2020 Q3</th>
<th>FY 2020 Q4</th>
<th>FY 2021 Q1</th>
<th>FY 2021 Q2</th>
<th>FY 2021 Q3</th>
<th>FY 2021 Q4</th>
<th>Pref Dir</th>
<th>Trend</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of state programs for drinking water lead testing for schools</td>
<td>0</td>
<td>Target</td>
<td>0</td>
<td>10</td>
<td>30</td>
<td>45</td>
<td>51</td>
<td>51</td>
<td>51</td>
<td>51</td>
<td>(\uparrow)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Actual</td>
<td>43</td>
<td>45</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of lead nonattainment areas</td>
<td>13</td>
<td>Target</td>
<td>13</td>
<td>12</td>
<td>11</td>
<td>11</td>
<td>11</td>
<td>11</td>
<td>10</td>
<td></td>
<td>(\downarrow)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Actual</td>
<td>12</td>
<td>12</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of lead cleanup actions</td>
<td>0</td>
<td>Target</td>
<td>3</td>
<td>7</td>
<td>14</td>
<td>24</td>
<td>26</td>
<td>28</td>
<td>34</td>
<td>48</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Actual</td>
<td>12</td>
<td>20</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rate of lead-based paint firm recertifications</td>
<td>23%</td>
<td>Target</td>
<td>23.0%</td>
<td>23.7%</td>
<td>24.4%</td>
<td>25.1%</td>
<td>25.8%</td>
<td>26.5%</td>
<td>27.2%</td>
<td>28.0%</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Actual</td>
<td>24.0%</td>
<td>42.0%</td>
<td>42.4%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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 eight cleanup actions to address lead in soils, including: four remedial action projects and four removal actions. Year-to-date, EPA has completed 20 total clean up actions to address lead in soil (FY 2020 Q1 and Q2 results to date updated from 10 to 12 and 8 to 7 in FY 2020 Q4).
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.
Summary of Progress — FY 2020 Q3

EPA met or exceeded the FY 2020 Q3 targets for all four key indicators.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Jumping Off Point</th>
<th>FY 2020 Q1</th>
<th>FY 2020 Q2</th>
<th>FY 2020 Q3</th>
<th>FY 2020 Q4</th>
<th>FY 2021 Q1</th>
<th>FY 2021 Q2</th>
<th>FY 2021 Q3</th>
<th>FY 2021 Q4</th>
<th>Pref Dir</th>
<th>Trend</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of state programs for drinking water lead testing for schools</td>
<td>0</td>
<td>0</td>
<td>10</td>
<td>30</td>
<td>45</td>
<td>51</td>
<td>51</td>
<td>51</td>
<td>51</td>
<td>↑</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Target</td>
<td>Actual</td>
<td>43</td>
<td>45</td>
<td>49</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of lead nonattainment areas</td>
<td>13</td>
<td>13</td>
<td>12</td>
<td>11</td>
<td>11</td>
<td>11</td>
<td>11</td>
<td>11</td>
<td>10</td>
<td>↓</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Target</td>
<td>Actual</td>
<td>12</td>
<td>12</td>
<td>11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of lead cleanup actions</td>
<td>0</td>
<td>3</td>
<td>7</td>
<td>14</td>
<td>24</td>
<td>26</td>
<td>28</td>
<td>34</td>
<td>48</td>
<td>↑</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Target</td>
<td>Actual</td>
<td>12</td>
<td>20</td>
<td>32</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rate of lead-based paint firm recertifications</td>
<td>23%</td>
<td>23.0%</td>
<td>23.7%</td>
<td>24.4%</td>
<td>25.1%</td>
<td>25.8%</td>
<td>26.5%</td>
<td>27.2%</td>
<td>28.0%</td>
<td>↑</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Target</td>
<td>Actual</td>
<td>24.0%</td>
<td>42.0%</td>
<td>42.4%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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 49 states which will assist local educational agencies in voluntary testing for lead contamination in drinking water in schools and child care programs.
- States have begun to implement the grant and submit required quarterly administrative status reports. Fifteen states have provided reports, with the rest requesting extensions due to challenges with the COVID-19 pandemic. The 15 states that submitted reports indicate that minimal or no funding has been spent to date. In the meantime, states continue to carry out program implementation plans, including a phased approach for testing in schools and child care facilities; communication plans for communities; and measures to ensure approved quality assurance plans are in place as soon as testing is scheduled to begin.
- In June, the grant and 3Ts team virtually met with EPA’s Memorandum of Understanding (MOU) partners, focusing on Update on the Development of New Technical and Educational Materials for Reducing Lead in Drinking Water in Schools and Child Care Facilities.
  - The update included information on steps to provide additional 3Ts resources anticipated later this year to further assist stakeholders with implementation of testing programs.
- EPA has also reprogrammed FY 2020 funding to EPA regional offices for awards. The new participants in the grant program in FY 2020 include American Samoa, Puerto Rico and the U.S Virgin Islands.

Strategy 2 – Reduce Number of Lead Nonattainment Areas
- EPA reduced the number of lead nonattainment areas from 12 to 11 in FY 2020 Q3, meeting the target of 11.
- EPA finalized a maintenance plan approval and redesignation request for the 2008 Pb NAAQS Muncie, IN area.
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 12 cleanup actions to address lead in soils, including three remedial action projects and nine removal actions. Year-to-date, EPA has completed 32 total cleanup actions to address lead in soil. (FY 2020 Q1, Q2 and Q3 results updated in FY 2020 Q4).

**Strategy 4– Increase the Rate of Lead-Based Paint Firm Recertifications**
- The rate of lead-based paint firm recertification exceeded Q3 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 COVID-19, recipients and applicants of Federal Financial Assistance are experiencing challenges such as delays to begin the implementation of testing programs due to school closures until tentatively Fall 2020. This might make it challenging for states to meet their testing milestones. Grantees/awardees are communicating and working diligently with EPA regional offices to remain compliant with program goals and grant requirements.

**Strategy 2 – Reduce Number of Lead Nonattainment Areas**
- None identified during the Q3 performance review.

**Strategy 3 – Complete Cleanup Actions at Sites Where Lead is a Contaminant of Concern:**
- Need to assess, and to the extent possible address, the potential effects of COVID-19 delays on reaching the end-of-year target.

**Strategy 4– Increase the Rate of Lead-Based Paint Firm Recertifications**
- None identified during the Q3 performance review
EPA met or exceeded the FY 2020 Q4 targets for all four key indicators.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Jumping Off Point</th>
<th>FY 2020 Q1</th>
<th>FY 2020 Q2</th>
<th>FY 2020 Q3</th>
<th>FY 2020 Q4</th>
<th>FY 2021 Q1</th>
<th>FY 2021 Q2</th>
<th>FY 2021 Q3</th>
<th>FY 2021 Q4</th>
<th>Pref Dir</th>
<th>Trend</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of state programs for drinking water lead testing for schools</td>
<td>0</td>
<td>Target</td>
<td>0</td>
<td>10</td>
<td>30</td>
<td>45</td>
<td>51</td>
<td>51</td>
<td>51</td>
<td>51</td>
<td>↑</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Actual</td>
<td>43</td>
<td>45</td>
<td>49</td>
<td>51</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of lead nonattainment areas</td>
<td>13</td>
<td>Target</td>
<td>13</td>
<td>12</td>
<td>11</td>
<td>11</td>
<td>11</td>
<td>11</td>
<td>11</td>
<td>10</td>
<td>↓</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Actual</td>
<td>12</td>
<td>12</td>
<td>11</td>
<td>11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of lead cleanup actions</td>
<td>0</td>
<td>Target</td>
<td>3</td>
<td>7</td>
<td>14</td>
<td>24</td>
<td>26</td>
<td>28</td>
<td>34</td>
<td>48</td>
<td>↑</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Actual</td>
<td>12</td>
<td>20</td>
<td>32</td>
<td>56</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rate of lead-based paint firm recertifications</td>
<td>23%</td>
<td>Target</td>
<td>23.0%</td>
<td>23.7%</td>
<td>24.4%</td>
<td>25.1%</td>
<td>25.8%</td>
<td>26.5%</td>
<td>27.2%</td>
<td>28.0%</td>
<td>↑</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Actual</td>
<td>24.0%</td>
<td>42.0%</td>
<td>42.4%</td>
<td>38.6%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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 all 50 states and the District of Columbia to assist local educational agencies in voluntary testing for lead contamination in drinking water in schools and child care facilities.
- By the end of Quarter 4, EPA has awarded FY 2020 funding to 23 states to further assist voluntary testing for lead contamination in drinking water at schools and child care facilities.
- EPA has completed resource materials to further assist stakeholders with implementation of testing programs in this quarter. These include factsheets to guide facilities to improve drinking water quality during and after extended closures and an e-tracker and e-builder to guide and promote Communication, Training, Testing, Taking Action efforts of lead testing in the facilities.

Strategy 2 – Reduce Number of Lead Nonattainment Areas
- EPA met the FY 2020 Q4 target to reduce the number of lead nonattainment areas to 11.
- 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 24 lead cleanup actions including 12 remedial action projects and 12 removal action projects. In FY 2020 EPA completed 56 total cleanup actions significantly exceeding its FY 2020 target (24). EPA did not identify any COVID-19 related challenges impeding completing lead cleanup projects.
Summary of Progress — FY 2020 Q4 (continued)

Strategy 4— Increase the Rate of Lead-Based Paint Firm Recertifications
- EPA exceeded the FY 2020 Q4 target for rate of lead-based paint firm recertification in part due to implementation of enhanced outreach and education efforts which included reminder emails and postcard mailings to RRP firms with expiring certifications.

Challenges:

Strategy 1 – Increase Drinking Water Lead Testing Programs for Schools
- Recipients and applicants continue to experience delays with implementation and continue testing programs due to school closures. COVID-19 has also hindered states from meeting their testing milestones in schools. Grantees/awardees continue to communicate and work diligently with EPA to remain compliant with program goals and grant requirements.

Strategy 2 – Reduce Number of Lead Nonattainment Areas
- None identified during the Q4 performance review.

Strategy 3 – Complete Cleanup Actions at Sites Where Lead is a Contaminant of Concern:
- None identified during the Q4 performance review.

Strategy 4— Increase the Rate of Lead-Based Paint Firm Recertifications
- None identified during the Q4 performance review.
## Strategy 1 – Increase Drinking Water Lead Testing for Schools

<table>
<thead>
<tr>
<th>Key Milestones</th>
<th>Due Date</th>
<th>Status</th>
<th>Change from Last Quarter</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Award grants to all 51 applicants.</td>
<td>Q1/FY 2021</td>
<td>Complete</td>
<td>Changed from On Track to Complete</td>
<td>All 51 grants have been awarded as of FY 2020 Q4.</td>
</tr>
<tr>
<td>Host webinars on the implementation of the grant and how to leverage partnership</td>
<td>Q3/FY 2020</td>
<td>Complete</td>
<td>No Change</td>
<td>Hosted webinars on 3Ts and Updates for Water Infrastructure Improvements for the Nation (WIIN) Grant Program.</td>
</tr>
<tr>
<td>All grantees submit annual reports.</td>
<td>Q1/FY 2021</td>
<td>On Track</td>
<td>Changed from Not Yet Started to On Track</td>
<td>Standard grant reporting requirements are noted in the terms and conditions of the grant award package. Due to the impact of COVID-19, EPA provided awardees with an extension if requested to report on quarterly program progress for FY 2020 Q2 or Q3. EPA initiated the annual reporting requirement at the end of Q4.</td>
</tr>
<tr>
<td>Summarize key findings from submitted annual reports.</td>
<td>Q3/FY 2021</td>
<td>On Track</td>
<td>New</td>
<td>Develop first annual summary of grants accomplishments and key findings from submitted annual reports and post on grant website.</td>
</tr>
<tr>
<td>Hold virtual 3Ts MOU partnership meeting.</td>
<td>Q3/FY 2020</td>
<td>Complete</td>
<td>No Change</td>
<td>Hosted virtual meeting with the MOU partners, focusing on Update on the Development of New Technical and Educational Materials for Reducing Lead in Drinking Water in Schools and Child Care Facilities. The update included the announcement of additional 3Ts resources anticipated later this year to further assist stakeholders with implementation of testing programs, including an interactive tool that builds a plan for “Communication, Training, Testing, Taking Action” (as referenced in the 3Ts manual) and 3Ts Sample Field Guide with Video: A step guide on how to collect lead samples.</td>
</tr>
<tr>
<td>Territories participate in FY 2020 grant program.</td>
<td>Q3/FY 2020</td>
<td>Complete</td>
<td>No Change</td>
<td>FY 2020 grant funding provided another opportunity for territories to enter and participate in the grant program. In May 2020, Puerto Rico, American Samoa, and the U.S. Virgin Islands agreed to participate and develop workplans to apply for the FY 2020 grant funding.</td>
</tr>
</tbody>
</table>
### Key Milestones (continued)

**Strategy 2 – Reduce Number of Lead Nonattainment Areas**

<table>
<thead>
<tr>
<th>Key Milestones</th>
<th>Due Date</th>
<th>Status</th>
<th>Change from Last Quarter</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Take action on lead area redesignation requests and maintenance plans as appropriate.</td>
<td>Quarterly</td>
<td>On Track</td>
<td>No Change</td>
<td>EPA met the FY 2020 target for lead nonattainment areas in Q4.</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Key Milestones</th>
<th>Due Date</th>
<th>Status</th>
<th>Change from Last Quarter</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase by 2021 the number of cleanup actions completed with lead as a contaminant of concern.</td>
<td>Q4/FY 2021</td>
<td>Complete</td>
<td>Changed from No Change to Complete</td>
<td>EPA exceeded the FY 2020 annual target.</td>
</tr>
<tr>
<td>Outreach to regional offices to review and track ongoing remedial cleanup actions to determine which have lead as a contaminant addressed by the cleanup.</td>
<td>Q4/FY 2020</td>
<td>Complete</td>
<td>Changed from Ongoing to Complete</td>
<td>Effort was initiated in FY 2020 Q1 and continued as part of routine quarterly reporting.</td>
</tr>
<tr>
<td>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.</td>
<td>Q4/FY 2021</td>
<td>Complete</td>
<td>No Change</td>
<td>Research was published in the peer-reviewed March 2020 issue of the Journal of Environmental Economics and Management: <a href="https://doi.org/10.1016/j.jeem.2019.102289">https://doi.org/10.1016/j.jeem.2019.102289</a>. 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.</td>
</tr>
</tbody>
</table>

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)

#### Strategy 4 – Increase Lead-based Paint Firm Recertifications

<table>
<thead>
<tr>
<th>Key Milestones</th>
<th>Due Date</th>
<th>Status</th>
<th>Change from Last Quarter</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
<td>Quarterly</td>
<td>On Track</td>
<td>No Change</td>
<td>EPA is sending email reminders from an individual’s email rather than the “no reply” account. The purpose is to reduce the number of reminders that end up in the spam folder of recipients.</td>
</tr>
<tr>
<td>Send reminder post cards to RRP firms whose certification expiration falls in the current quarter.</td>
<td>Quarterly</td>
<td>On Track</td>
<td>No Change</td>
<td>EPA is mailing post cards to RRP firms whose certification is about to expire. These mailings are intended to help ensure the recertification message is received.</td>
</tr>
<tr>
<td>Send expiration post cards to RRP firms whose certification expired in the previous quarter.</td>
<td>Quarterly</td>
<td>On Track</td>
<td>No Change</td>
<td>EPA is mailing post cards to RRP firms whose certification has recently expired. These mailings are intended to help ensure the recertification message is received.</td>
</tr>
</tbody>
</table>
Number of Drinking Water Lead Testing Programs
Jumping Off Point: 0
Preferred Direction: Higher Than Target

- FY 2020 Q1: 43
- FY 2020 Q2: 45
- FY 2020 Q3: 49
- FY 2020 Q4: 51
- FY 2021 Q1: 51
- FY 2021 Q2: 51
- FY 2021 Q3: 51
- FY 2021 Q4: 51

10% of target met or exceeded
75% of target met
<75% of target met
Target
Key Indicators (continued)

Number of Lead Nonattainment Areas
Jumping Off Point: 13
Preferred Direction: Lower Than Target

- FY 2020 Q1: 13
- FY 2020 Q2: 12
- FY 2020 Q3: 11
- FY 2020 Q4: 11
- FY 2021 Q1: 11
- FY 2021 Q2: 11
- FY 2021 Q3: 11
- FY 2021 Q4: 10

100% of target met or exceeded
75-99% of target met
<75% of target met
Target
Key Indicators (continued)

Number of Lead Cleanup Actions
Jumping Off Point: 0
Preferred Direction: Higher Than Target

FY 2020 Q1: 12
FY 2020 Q2: 7
FY 2020 Q3: 20
FY 2020 Q4: 32
FY 2021 Q1: 14
FY 2021 Q2: 24
FY 2021 Q3: 56
FY 2021 Q4: 26

Legend:
- Green: 100% of target met or exceeded
- Yellow: 75-99% of target met
- Red: <75% of target met
- Blue: Target
Key Indicators (continued)

Rate of Lead-Based Paint Firm Recertifications
Jumping Off Point: 23.0%
Preferred Direction: Higher Than Target

- 100% of target met or exceeded
- 75-99% of target met
- <75% of target met
- Target
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](http://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](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](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 (OCSPP)** – 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
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. Department of Energy [www.energy.gov](http://www.energy.gov)
- U.S. Department of Health and Human Services [www.hhs.gov](http://www.hhs.gov)
- U.S. Department of Justice [www.justice.gov](http://www.justice.gov)
- U.S. Department of Labor [www.dol.gov](http://www.dol.gov)
- U.S. Department of Transportation [www.transportation.gov](http://www.transportation.gov)
- U.S. Environmental Protection Agency [www.epa.gov](http://www.epa.gov)
- Council of Economic Advisers [www.whitehouse.gov/administration/eop/cea](http://www.whitehouse.gov/administration/eop/cea)
- Council on Environmental Quality [www.whitehouse.gov/administration/eop/ceq](http://www.whitehouse.gov/administration/eop/ceq)
- Domestic Policy Council [www.whitehouse.gov](http://www.whitehouse.gov)
- National Economic Policy Council [www.whitehouse.gov](http://www.whitehouse.gov)
- Office of Management and Budget [www.whitehouse.gov/omb](http://www.whitehouse.gov/omb)
- Office of Science and Technology Policy [www.whitehouse.gov/administration/eop/ostp](http://www.whitehouse.gov/administration/eop/ostp)