

LEAD TESTING IN CHILD CARE CENTERS FREQUENTLY ASKED QUESTIONS

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PREPARING FOR LEAD TESTING

Question	Answer	References
<p>Q1: What causes water to test with elevated levels of lead (i.e. lead exceedances)?</p>	<p>A: Sources of lead in a child care center’s plumbing may include lead leaching from lead pipes, lead pipe fittings, lead solder and fixtures, sediment, meter and valves or the lead service line.</p>	<p>California Department of Public Health (CDPH), Childhood Lead Poisoning Prevention Branch</p> <p>United States Environmental Protection Agency (EPA) https://www.epa.gov/lead</p>
<p>Q2: How do child care centers test our water for lead?</p>	<p>A: The Department has issued Written Directives for lead testing that detail the testing steps. The Directives provide information including contacting an external certified water sampler.</p>	<p>Written Directives for lead testing are found in PIN 21-21-CCP</p>
<p>Q3: What is a water sampler?</p>	<p>A: A Certified External Water Sampler is defined in the Written Directives for lead testing to mean a water sampler who has met the requirements of the External Water Sampler Self-Certification Form (LIC 9275). Refer to page 6 of PIN 21-21-CCP for details of the requirements to be considered a certified external water sampler.</p>	<p>PIN 21-21-CCP</p> <p>See sections 101700.1(c)(1) Definitions</p> <p>101700.5 Certified Water Sampler</p>

<p>Q4: How do child care centers locate a Certified External Water Sampler?</p>	<p>A: It is the responsibility of the child care center providers to search for a sampler, using the resources contained within page 8 of PIN 21-21-CCP.</p> <p>Only Certified External Water Samplers, who have completed an External Water Sampler Self-Certification form (LIC 9275) shall be used to conduct the child care center water collection.</p>	<p style="text-align: center;">PIN 21-21-CCP</p> <p style="text-align: center;">See Section 101700.5 Certified Water Sampler</p>
<p>Q5: Is there a list of qualified samplers in my area?</p>	<p>A: The Department does not make referrals to samplers. However, once the Department receives information from Certified External Water Samplers that wish to be listed, an ongoing list for public viewing will be located at this AB 2370 Sampler Directory, which currently includes samplers operating in every county in California.</p> <p>Please note that to be considered a certified sampler, the Written Directives for lead testing found in PIN 21-21-CCP, which includes the External Water Sampler Self-Certification Form (LIC 9275), must be followed.</p>	<p style="text-align: center;">PIN 21-21-CCP</p> <p style="text-align: center;">See Section 101700.5 Certified Water Sampler</p>
<p>Q6: If our child care center has already had our water tested for lead prior to July 28, 2021, can we just send the results of the previous testing?</p>	<p>A: No. Results from testing conducted prior to the release of the Written Directives for lead testing (July 28, 2021) do not meet the requirements of the Written Directives for lead testing.</p>	<p style="text-align: center;">PIN 21-21-CCP</p> <p style="text-align: center;">See Section 100700(a) General</p>

<p>Q7: What should child care centers do to get ready the day before water sampling?</p>	<p>A: Instructions for preparation the day before the water sampling appointment are detailed in the Written Directives for Lead Testing.</p> <p>This includes, but is not limited to, ensuring a proper stagnation period occurs. Devices located anywhere along the water supply line to each drinking water fixture where samples will be drawn may not be used the night before or morning of testing, and for a minimum of 8 hours prior to testing. This is a necessary water stagnation period.</p>	<p>PIN 21-21-CCP</p> <p>See Section 101701 Preparation Prior to Water Sampling</p>
<p>Q8: What is meant by water stagnation?</p>	<p>A: Stagnation is defined in the Written Directives for lead testing to mean water is not flowing or moving in the pipes. To assess whether lead is getting into water, stagnant water is sampled. In this specific program, the stagnation of water prior to testing must be between 8 and 18 hours.</p>	<p>PIN 21-21-CCP</p> <p>See section 101700.1(s)(1) Definitions</p>
<p>Q9: What happens if water is used during the stagnation period?</p>	<p>A: If the supply line is used within the 8-hour stagnation period, this may cause water sample results that are not representative of normal operating conditions and test results will be invalid. The sampling appointment would have to be rescheduled.</p>	<p>PIN 21-21-CCP</p> <p>See Section 101701(k)(4) Preparation Prior to Water Sampling</p>
<p>Q10: Which outlets are required to be tested for lead?</p>	<p>A: All cold-water outlets used for drinking or food preparation must be tested for lead. All faucets, fountains, coolers, bubblers, bottle filling stations, and filtered water dispensers located on the inside and outside of the child care center shall be water sampled.</p>	<p>PIN 21-21-CCP</p> <p>See Section 101701 Preparation Prior to Water Sampling</p>

	This information is outlined on page 9 of PIN 21-21-CCP in greater detail.	
Q11: If we get our meals from our district's central kitchen, does the kitchen's water also need to be tested?	A: There is no requirement to test the outlets of an off-site food delivery source or vendor.	PIN 21-21-CCP See Section 101700(b) General
Q12: If a child care center contracts out for food services to a third-party vendor, does the vendor need to be tested for lead?	A: There is no requirement to test the outlets of an off-site food delivery service or vendor.	PIN 21-21-CCP See Section 101700 General
Q13: Do child care centers have to mark water outlets on the facility map of shared campus/space used by other building operators that are not part of the licensed facility?	A: Yes, when marking the child care center's LIC 999 facility map, include any outlet outside the boundaries of the child care center facility that is used for food preparation or distributes drinking water to children in care."	PIN 21-21-CCP See Section 1017001.(o)(1) Definitions
Q14: How do child care centers mark- up which faucets/fixtures to test?	A: All water sample water fixtures need to be taped and covered with a plastic bag by child care center staff the evening prior to water sampling to ensure the stagnation period of 8 to 18 hours. The time the water sample location is covered shall be written on the tape used to cover the water sample locations.	PIN 21-21-CCP See section 101701(j) Preparation Prior to Water Sampling
Q15:	No, devices located anywhere along the supply line to each	PIN 21-21-CCP

<p>Does a child care center need to shut off water connections before sampling?</p>	<p>drinking water fixture outlet must not be modified, opened, or closed during the required 8 to 18-hour stagnation period. Doing so may cause sample results that are not representative of normal operating conditions and testing will be invalid.</p> <p>All angle stops, shutoff valves, and similar devices on the supply line providing water to the drinking water or food preparation water outlet locations must be left in a normal state of operation prior to water sampling.</p>	<p>See section 101701(l) Preparation Prior to Water Sampling</p>
<p>Q16: What is an angle stop?</p>	<p>A: An angle stop is an example of a valve. A valve is defined in the Written Directives for lead testing to mean a mechanical device by which the flow of water may be started, stopped, or regulated by a movable part that opens, shuts, or partially obstructs one or more ports of passageway (e.g. angle stop).</p>	<p>PIN 21-21-CCP</p> <p>See sections 101700.1 (v)(1) Definitions</p> <p>101701(l) Preparation Prior to Water Sampling</p>
<p>Q17: What if we have a sink that leaks or drips?</p>	<p>A: Testing appointments shall not be scheduled until there are no leaking or dripping faucets, fixtures, outlets, or toilets, and no water shall be flowing through the building service line or plumbing during the 8 to 18-hour stagnation period.</p>	<p>PIN 21-21-CCP</p> <p>See section 101701(k)(3) Preparation Prior to Water Sampling</p>

COLLECTING WATER SAMPLES

<p>Q18: When can water samples be collected?</p>	<p>A: If the child care center operates Monday through Fridays only, water samples must be collected on a Tuesday, Wednesday, Thursday, Friday, or Saturday morning.</p> <p>Samplers must arrive during the morning hours after a day of normal center operation (ensuring a stagnation period of 8 to 18 hours) and complete the sampling, prior to arrival of additional staff and children or any water usage.</p> <p>Sampling appointments can occur on the first day back following a vacation, holiday, or weekend, if all water outlets have been used the day before the sampling appointment.</p>	<p>PIN 21-21-CCP</p> <p>See section 101701 Preparation Prior to Water Sampling</p> <p>Child Care Center Sampling Checklist Form (LIC 9276)</p>
<p>Q19: Can child care centers conduct the water sampling during vacations, holidays or other shutdowns?</p>	<p>A: Sampling appointments cannot occur during extended breaks, vacations, holidays, or other shutdowns.</p>	<p>PIN 21-21-CCP</p> <p>See section 101701(a) Preparation Prior to Water Sampling</p>
<p>Q20: How long will sampling take?</p>	<p>A: Sampling timeframes will vary based on how many faucets will be tested.</p> <p>Ask the water sampler for an approximate time that it will take to conduct sampling.</p>	<p>PIN 21-21-CCP</p> <p>See section 101702 Instructions During Water Sampling Appointment</p>
<p>Q21: There are self-test kits? Does Licensing approve this kind of test?</p>	<p>A: No, self-test kits do not satisfy the requirements set forth in Assembly</p>	<p>PIN 21-21-CCP</p> <p>See section 101700.5(a)</p>

	Bill 2370 and the Written Directives for lead testing.	Certified Water Sampler
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POST TESTING AND RETESTING QUESTIONS

<p>Q22: Will I have to shut down my child care center if my water testing indicates an exceedance?</p>	<p>A: No, however, the use of that outlet for drinking or food preparation purposes shall immediately cease until it is replaced and retested. It is the licensee’s responsibility to obtain a potable source of water for children and staff at their location (e.g. bottled water).</p>	<p>PIN 21-21-CCP See section 101704(a) Lead Action Level Exceedance Response Requirements</p>
<p>Q23: What if all of my fixtures show an exceedance?</p>	<p>A: The use of outlets for drinking or food preparation purposes shall immediately cease until it is replaced, retested, and returns a result at or below the Action Level. It is the licensee’s responsibility to obtain a potable source of water for children and staff at their location (e.g. bottled water). A plan of remediation must be planned for all water outlets that reflect an exceedance via a Plan of Correction (POC). The POC shall detail the necessary steps to either permanently cease use of the outlet for drinking or food preparation or remediate by replacing the outlet.</p>	<p>PIN 21-21-CCP See section 101704 Lead Action Level Exceedance Response Requirements</p>
<p>Q24: Can child care centers just stop using a faucet with an exceedance?</p>	<p>A: The use of outlets for drinking or food preparation purposes shall immediately cease until it is replaced, retested, and returns a result at or below the Action Level. It is the licensee’s responsibility to obtain a potable source of water for children</p>	<p>PIN 21-21-CCP See section 101704 Lead Action Level Exceedance Response Requirements</p>

	and staff at their location (e.g. bottled water).	
Q25: Can child care centers get a copy of the testing results?	A: Yes. Upon receiving testing results from the Environmental Laboratory Accreditation Program (ELAP) lab, the Department shall notify the child care center licensee and provide the testing results.	PIN 21-21-CCP See section 101703 Post -Testing Requirements and Information
Q26: How long before child care centers can retest?	A: This will vary on a case-by-case basis, but providers can review their Plan of Correction (POC) to ensure proper steps are taken for testing. To condition the outlet, a replacement outlet shall be turned on for a least 30 seconds, at least four times a day, for at least three weeks prior to follow-up water sampling.	PIN 21-21-CCP See section 101705 Follow-up Corrective Action Water Sampling
Q27: Once a faucet is replaced can we start using it right away? Do we need to retest it?	A: Pursuant to section 101704 of the Written Directives for lead testing, outlets that have been replaced as part of a Plan of Correction (POC) shall be conditioned to the water at the child care center, resampled, and return a result at or below the Action Level prior to using the outlet for drinking or cooking.	PIN 21-21-CCP See section 101705 Follow-up Corrective Action Water Sampling
Q28: If there is an exceedance, how do child care centers find faucets with the lowest possible lead content to replace old faucets?	A: Linked is a resource on EPA Consumer Tool for Identifying POU Drinking Water Filters Certified to Reduce Lead and NSF Certified Product Listings for Lead Reduction	PIN 21-21-CCP See section 101704 Lead Action Level Exceedance Response Requirements

LEAD TESTING EXCLUSIONS

<p>Q29: Our centers are located on public elementary school sites. Do these testing results suffice?</p>	<p>A: No, previous testing at school sites will not meet the requirements for child care centers. In accordance with AB2370 and the Written Directives for lead testing, all child care centers, including child care centers located on school grounds, that were constructed before January 1, 2010, must test their water for lead by January 1, 2023.</p> <p>Requirements for child care centers are more comprehensive, follow different protocols and methods of testing, and the lead detection level for public schools differs from the lead detection level for child care centers.</p>	<p style="text-align: center;">PIN 21-21-CCP See section 101700 General</p>
<p>Q30: What is the requirement for a center in a building that was built prior to January 1, 2010 but was renovated (including fixture changes) after January 1, 2010?</p>	<p>A: The center shall test according to the requirements specified in the Written Directives for lead testing. There is no testing exemption for buildings renovated after January 1, 2010.</p>	<p style="text-align: center;">PIN 21-21-CCP See section 101700(b) General</p>
<p>Q31: How do Family Child Care Homes test their water for lead?</p>	<p>A: The new lead testing requirement does not apply to Family Child Care Homes (FCCHs). However, FCCHs may find the California Department of Public Health (CDPH) resources linked below useful.</p> <ul style="list-style-type: none"> • CDPH Childhood Lead Poisoning Prevention Branch 	<p style="text-align: center;">PIN 21-21-CCP See section 101700(b) General</p>

	<ul style="list-style-type: none"> • Information about Testing Your Home’s Drinking Water • Information for Homeowners about Testing Your Home for Lead 	
<p>Q32: What if child care centers are currently using filtered water?</p>	<p>A: Filtering does not impact the testing requirements of the Written Directives for lead testing. All faucets, fountains, coolers, bubblers, bottle filling stations, and filtered water dispensers located on the exterior and interior of buildings, including those located in hallways, playgrounds, classrooms, and cafeterias, shall be evaluated to assure that all applicable water outlets are tested.</p>	<p>PIN 21-21-CCP</p> <p>See section 101701(a)(1) Preparation Prior to Water Sampling Appointment</p>
<p>Q33: What if child care centers have well water?</p>	<p>A: This does not impact the testing requirements of the Written Directives for lead testing. If the child care center facility uses water from a well, information about well testing can be found by going to the California Water Board website, Groundwater Ambient Monitoring and Assessment Program (GAMA) page.</p>	<p>Groundwater Ambient Monitoring and Assessment Program (GAMA) page.</p>
<p>Q34: Is testing required if a child care center exclusively uses bottled water, and no water outlets/faucets are used for drinking or food preparation.</p>	<p>A: If a child care center exclusively uses bottled water, and no water outlets/faucets are used for drinking or food preparation, water sampling and testing would not be required. Contact the child care center’s designated Licensing Program Analyst for guidance.</p> <p>If, after January 1, 2023, it is determined that any other sources of water are used for either drinking or food preparation, the</p>	<p>PIN 21-21-CCP</p> <p>See section 101700(d) General</p>

	<p>facility would be subject to adverse action, including but not limited to being cited and having a plan of correction put in place for the required testing.</p>	
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FUNDING ASSISTANCE

<p>Q35: Is there state or federal grant funding available for lead testing?</p>	<p>A: Contained within the Provider Information Notice (PIN), PIN 21-04-CCP - Availability Of State And Federal Funding To Test Drinking Water For Lead Contamination In Child Care Centers For Remediation (Correction) of Lead Contamination, is a hyperlink to an online eligibility form (https://ab2370assistance.owp.csus.edu/). This link will direct you to the Sacramento State, Office of Water Programs page, who the California Department of Social Services (CDSS) has contracted with to assist child care centers eligible for grant funding. This is the first step in the eligibility process.</p> <p>In addition to state funding, the CDSS Child Care Licensing Program has additionally been awarded approximately \$6.1 million through the United States Environmental Protection Agency’s WIIN Grant: Lead Testing in School and Child Care Program Drinking Water. More information, including priority criteria and instructions regarding distribution of these funds, will be provided in the future.</p>	<p style="text-align: center;"> PIN 21-04-CCP & PIN 21-21-CCP </p> <p style="text-align: center;">See section 101700.6 Grant Funding for Qualifying Child Care Centers</p>
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