

Lead and Copper Rule Improvements Quick Guide: Schools and Child Care

May 2026

What are the school and child care facility requirements?

The Lead and Copper Rule Improvements (LCRI) require community water systems to sample for lead in schools and licensed child care facilities, increase education about the health effects of lead, and provide information on how to reduce exposure to lead in drinking water.

Requirements, details, and deadlines.

Requirement	Details	Date(s)
List of schools and licensed child care facilities	- Water Systems must submit a list of all schools and licensed child care facilities that they serve to the department, or certify they do not serve schools or licensed child care facilities, unless the school or licensed child care facility: - Was constructed or had full plumbing replacement on or after July 1, 2015, and does not have a lead, galvanized requiring replacement (GRR), or unknown service line; or - Is regulated as a public water system.	By Nov. 1, 2027.
	Water Systems must submit an updated list of schools and licensed child care facilities or certify that there have been no changes to the initial list within the first five years of the LCRI's effective date (See Reporting Requirements for additional submissions required).	By Nov. 1, 2032, and once every five years thereafter.
	Water Systems that do not serve any schools or licensed child care facilities must certify annually that they do not serve any of these facilities.	Beginning Jan. 30, 2029, and annually thereafter.
Public education requirements	- At least once per year, community water systems must provide public education to the schools and licensed child care facilities they serve. - This notice must contain information about sources and health effects of lead, and steps to reduce exposure to lead in drinking water, among other important information.	Beginning Nov. 1, 2027, and annually thereafter.

Requirement	Details	Date(s)
Notification of sampling eligibility	Water Systems must notify elementary schools and licensed child care facilities that they are eligible to be sampled for lead, including a proposed schedule for sampling.	Within the first five years after Nov 1, 2027.
	Water Systems must notify secondary schools that they are eligible to be sampled for lead upon request and provide information about how to request sampling.	Annually, for the first five years starting Nov. 1, 2027.
	- Water Systems must notify all schools and licensed child care facilities that they are eligible to be sampled for lead upon request. - Notices must contain information about sampling for lead in schools and licensed child care facilities, such as EPA's 3Ts for Reducing Lead in Drinking Water Toolkit.	Annually, after Nov. 1, 2032.
Sampling frequency	- Water Systems must collect samples from at least 20 percent of elementary schools and 20 percent of licensed child care facilities each year until all have been sampled once, declined sampling, or are non-responsive. - Refusals and non-responses count toward the 20 percent.	No later than Nov. 1, 2032.
	Water Systems must sample at secondary schools upon request, but no more than once in a five-year period.	Effective Nov. 1, 2027.
	- Water Systems are not required to sample more than 20 percent of schools or licensed child care facilities in any given year. - Water Systems must sample at elementary schools and licensed child care facilities upon request, but no more than once in a five-year period.	Beginning Nov. 1, 2032.
Sampling protocols	Requirement - Water Systems must collect five samples at schools and two samples at licensed child care facilities. - The water system may allow school or licensed child care facility staff (or another trained individual) to collect samples after they instruct them on proper sample collection procedures.	Effective Nov. 1, 2027.

Requirement	Details	Date(s)
	Locations • Water Systems must collect five samples at schools: ◦ Two drinking water fountains. ◦ One kitchen faucet used for drinking or cooking. ◦ One classroom faucet or other tap used for human consumption. ◦ One nurse's office faucet, as available. • Water System must collect two samples at licensed child care facilities: ◦ One drinking water fountain. ◦ One of either a kitchen faucet used for drinking or cooking, or a faucet (or other tap) used for human consumption. • If any school or licensed child care facility does not contain the type of tap required, the water system must sample from another location typically used to provide water for human consumption. • If there are not enough sample locations, the water system must sample all taps used to provide water for human consumption. Volume • Water Systems must collect a 250 milliliter first-draw sample. Stagnation • Water Systems must collect samples after an eight to 18-hour stagnation period.	
Notification of lead sample results in schools and licensed child care facilities	• Water Systems must: ◦ Provide lead tap sample results to schools and licensed child care facilities, local and state health authorities, and TDEC, regardless of lead sample concentration. ◦ Share information about potential options to remediate lead in drinking water (consistent with EPA's 3Ts for Reducing Lead in Drinking Water Toolkit).	As soon as possible, but within 30 days of receipt. Beginning Nov. 1, 2027, as applicable.
Alternative school and licensed child care facility sampling program waiver	• Community water systems with schools and licensed child care facilities that previously sampled for lead due to a State or local law/program (this includes the WIIN program and contractor TruPani) between Jan. 1, 2021, and Nov. 1, 2027, may be eligible for a lead sampling waiver at those specific facilities. ◦ The water system must conduct annual public education in all schools and licensed child care facilities, even at facilities that are waived for sampling.	Effective Nov. 1, 2027, for the first five years.

Requirement	Details	Date(s)
Outreach for a recently-added school or licensed child care facility	Water Systems that include a new school or licensed child care facility in the annual update to the department must conduct outreach at the school/licensed child care facility once before conducting sampling.	Once, before conducting sampling.
Reporting requirements	- Water Systems must annually certify that they: - Made a good faith effort to identify schools and licensed child care facilities; - Delivered information about health risks from lead in drinking water to the schools and licensed child care facilities they serve; - Completed the required notification and sampling requirements for elementary and secondary schools and licensed child care facilities, including the number of facilities sampled; and - Provided sample results to the school/licensed child care facility, and local and state health departments and TDEC.	Beginning Jan. 30, 2029, and by Jan. 30 annually thereafter.
	- Starting with the sixth year after the compliance date, the water system must annually certify that they: - Completed the required notification and sampling requirements for elementary and secondary schools and licensed child care facilities; and - Provided sample results to the school/licensed child care facility, and local and state health departments and TDEC.	Beginning Jan. 30, 2033, and by Jan. 30 annually thereafter.
New Consumer Confidence Report (CCR) requirements	Water Systems must include a statement in their CCR that they are required to sample for lead in schools and licensed child care facilities, and guide the public to contact their respective facility for more information.	Beginning Nov. 1, 2027.

Questions?

To learn more, visit the TDEC [Lead & Copper Rule webpage](#). Email questions to DWRWater.Compliance@tn.gov.