

Lead Testing in School Drinking Water November 7, 2016



- Background Information and Additional Resources
- HCS Access
- HERDS Access
- HERDS Data Entry
- Troubleshooting



Background Information



Background

- On September 6, 2016, Governor Cuomo signed into law a bill recently passed the New York State Legislature (<u>A10740/S8158</u>).
- This law requires the New York State Department of Health (Department) to develop regulations to require all school districts and boards of cooperative educational services (BOCES)—collectively, "schools"—to test all potable water outlets for lead contamination, and to take responsive actions.





Emergency Regulation

- Titled: Lead Testing in School Drinking Water 10 NYCRR Subpart 67-4 (Subpart 67-4)
- Effective September 6, 2016
- Published in State Register September 21, 2016
- The regulation can be found on the Department of Health's website at: <u>health.ny.gov/regulations/emergency/docs/2016-</u> 09-06_lead_testing_in_school_drinking_water.pdf
- Public comments can be sent to: regsqna@health.ny.gov





A Comparison between EPA's 3Ts and NYS's Lead Testing in School Drinking Water protocols

Subject matter	EPA 3Ts	NYS DOH
2-Step sampling procedure: first draw and 30 second flush samples	Discusses both sample types	Only First draw samples are required. However, schools can opt to collect a 30- second flush sample during their sampling events.
Action Level	20 ug/L (parts per billion, ppb)	15 ug/L (to be consistent with the LCR action level)
Sample volume	250 mL	250 mL
Bottle type	Not discussed	wide mouth, plastic bottle recommended
When to plan sampling events	Avoid collecting samples in the mornings after vacations, weekends, or holidays unless specifically directed to do so.	Avoid collecting samples in the mornings after vacations, weekends, or holidays unless specifically directed to do so.
Water stagnation time in pipes	8 - 18 hours	8 - 18 hours

"Lead-free School"

Clarification:

The term "Lead-free school" as it applies to this legislation/regulation means that the internal plumbing in an entire <u>school building</u> *not individual outlets* - meets the new definition of "lead-free" as defined in Section 1417 of the federal Safe Drinking Water Act.



Important Dates!

- Sept. 6, 2016: Effective date of the Lead Testing in School Drinking Water regulation
- Sept. 30, 2016: Schools must complete sampling in pre-K thru grade 5 buildings
- <u>Oct. 18, 2016</u>: Schools who conducted testing and remediation efforts prior to Sept. 6, 2016 must post results and remediation plans/efforts on their school website
- Oct. 31, 2016: Schools must complete sampling in grade 6 through grade 12 buildings
- <u>Oct. 31, 2016</u>: Schools must post on their website the list of buildings whose plumbing materials are deemed "lead-free"
- <u>Nov. 11, 2016</u>: Schools must enter the completion (or status there-of) of their initial sampling requirements - AND - their list of buildings whose plumbing materials are deemed "lead-free" in HERDS
- Within 10 Business Days of Receiving Lab Results: School must report *data relating to test results* in HERDS.



• <u>2020</u> – The next round of sampling begins

Reporting/Recordkeeping Requirements Summary

- Posting lab results on school website:
 - Schools must post their lab results on their school website as soon as practical, but within 6 weeks of receiving the lab reports. We encourage schools to provide as much detail information as they can on their website, regarding the test results.
- <u>Reporting result information in HERDS</u>:
 - Schools must report data relating to test results in HERDS as soon as practical, but within 10 business days of receiving the lab reports
- When an action level is exceeded:
 - Schools must notify the local health department within **1 business day after receiving lab report.**
 - School must notify the school community (staff, parents/guardians) IN WRITING within 10 business days of receiving lab reports
- If the school performed testing/remediation prior to Sept. 6, 2016:
 - School must provide written notification of the results/remediation within 10 business days of the effective date (9/6/2016) – which was September 20th!
- <u>Record Retention: 10 years</u>
 - Schools must retain on site records of test results, lead remediation plans, "lead-free" plumbing determinations, and waiver requests and approvals for 10 years following document creation.

Additional Information



 EPA's <u>3Ts For Reducing Lead in Drinking Water in</u> <u>Schools Revised Technical Guidance</u>



· Environmental Protection Agency (EPA) Presentation

Department of Health Individuals/Families **Providers/Professionals** Health Facilities You are Here: Home Page > Drinking Water > Lead Testing of School Drinking Water Lead Testing of School Drinking Water Memos to Schools August 29, 2016 (PDF, 84KB) September 15, 2016 (PDF, 141KB) Information for Schools New York State Regulation for Lead Testing in School Drinking Water (PDF, 80KB) Frequently Asked Questions (PDF, 68KB) Waiver Protocol (PDF, 214KB) Sampling Instructions · Video: "Sampling for Lead in Drinking Water in NYS Schools " <u>Certified Laboratories for Conducting Lead Testing in School Drinking Water</u> Public Notification Letter Template (DOC, 44KB) Example Outlet Signage (PDF, 280KB) Health Commerce System (HCS)/HERDS Access Information (PDF, 733KB) · EPA Guidance: 3Ts for Reducing Lead in Drinking Water in Schools DOH/SED Webinars (9/16/16 & 10/4/16) DOH/EPA Webinar Presentations (9/23/2016) NYS Department of Health Presentation

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Health Commerce System (HCS) Access



Where to register

- 1) Open your web browser and enter this web address in the address bar: <u>https://commerce.health.state.ny.us</u>
- 2) On the HCS log in page, click All Others
- 3) Click '**Register** for an account' and follow the two step process:
 - a) Register for an account
 - b) Enroll your account on the HCS. This step must be done with your HCS Coordinator.

	User ID
	User ID
	Password
	Password
Th off ac	e sharing of user accounts is strictly forbidden. Repe renses may result in the permanent removal of your
-10	count.
	Sign In
Fo	count. Sign In Drgot your passwo. ۲۲ ۲ Forgot your user ID?



How to register

REGISTER ONLY ONCE!

1. Complete the Name, Address and Policy Statement sections, and click Continue

- NOTE: Your name must match what is on your Photo ID
- 2. Create a user ID and password, click Continue
- 3. Answer at least six of the 27 secret questions, click Register
- 4. Verify your account information, and click Confirm
- 5. Print your Account Registration Completion information, click OK
- 6. Print the email confirming that your user ID was created

7. See your *HCS Coordinator with your Account Registration Completion email printout and your Photo ID

*If you do not know your HCS Coordinator, or your school needs a new HCS Director/Coordinator please call the Commerce Accounts Management Unit (CAMU) at 1-866-529-1890, option 1 (M-F 8am-4:45pm).

HERDS Access



Request Access to the HERDS application for a new user (with HCS access)

Have the <u>individual designated to report</u> on school lead in drinking water email their HCS Coordinator requesting to be added to the HERDS role of **School Lead in Drinking Water Reporter** for each individual school they will be reporting for.

If you do not know who your HCS Coordinator is and you have access to HCS, you can look them up following these steps:

- 1) Log into HCS
- 2) Click ¹My Content and select Look up my coordinators
- 3) A list will appear with the name, phone number, and email address for each of your HCS Coordinators



How to assign a role in the HCS Communications Directory (For HCS Coordinators)

- 1. Click Coordinator's Update Tool
- 2. Select the appropriate organization
- 3. Click Manage Role Assignments (blue tab)
- 4. Click the **Modify** link located to right of the role name

5. Under section 2 (if no one is currently in role) or section 3 (if someone in role), then select the name of the person with an ID you wish to add to the role and click **Add Role Assignments**. Avoid adding a person to the role if you see an "na" after their name, especially if you know the user has an existing HCS account.

5a. If you cannot locate the person in the list, then proceed to the last option, enter the person's last name in the Search for Person(s) by name, and click **Submit**

5b. Select the person in the list with a valid user ID

6. Click Add Role Assignments.

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Check to see what roles you are assigned to in HCS

- Log into HCS
- Select ¹ My Content from the top of the screen
- Click "See what roles I hold"
- A list will appear
 - If you do not see "School Lead in Drinking Water Reporter" assigned to you for each individual school you are to report under, then work with your HCS Coordinator to have the role added.

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Role Description	Organization Name
HERDS System Administrator	NYSDOH CEH
School Data Reporter	Z TEST PUBLIC SCHOOL
School Lead in Drinking Water Reporter	DOH TEST SCHOOL 1
School Lead in Drinking Water Reporter	Z TEST PUBLIC SCHOOL
School Lead in Drinking Water Reporter	DOH TEST SCHOOL 5

Add HERDS to your applications

- Log into HCS
- Select My Content from the top of the screen
- Click "All applications"
- Select **S**, then School Survey (HERDS) from the applications listed
- Click the green circle with a plus sign on the right of the application name
 - $\quad \bigcirc \rightarrow \bigcirc$
- Return to Home page, it will now appear under "My Applications"



HERDS Data Entry



What surveys need to be completed?

School Drinking Water Lead Free Building Survey

- If your school(s) meets the definition of a lead free building as defined in Section 1417 of the federal Safe Drinking Water Act, you should list the school(s) in this survey.
- All schools should complete this survey, regardless if they have lead free buildings.
- School Drinking Water Sampling and Results Survey
- You must complete this survey for each school.
 - If the entire school is lead free, enter zeros in the forms
- 2 forms:
 - 1: School Drinking Water- Lead Sampling Survey Form
 - 2: School Drinking Water- Lead Results Survey Form



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Important to note:

- You can update the forms as many times as necessary
- Each time a form is submitted, there is an attestation statement indicating:
 - "By clicking the 'Submit' button, I attest that all the data entered above is true and correct to the best of my knowledge, that I understand that such information shall be used for assessing regulatory compliance, and that I am authorized to submit this data on behalf of the school district or BOCES."

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Getting into HERDS: Click on it from "My Applications"

Health Commerce System L My Content - ⊨ Print Q Search A Home ▼ 🛈 Help 🗸 **Important Health Events** Welcome Michele L Herdt Visualization ZIKA VIRUS RESPONSE NYS PMP Q Search Portal My Applications Important Health Notifications Acronyms & Abbreviations Posted Priority Keyword Source Audience Description Recipients CART Commissioner's 09/23/2016 NYSDOH Dr. Zuckers September 2016 Monthly Letter Advisory Recipients Congenital Malformations Letter 0 County Survey New HERDS HERDS: New School Lead in Drinking Water Role; Please 09/21/2016 Advisory NYSDOH Recipients Role Add Designees ASAP Emergency Contacts Dear Form Builder Dear Administrator Letter from the NYSDOH for your prompt 09/07/2016 Advisorv Administrator NYSDOH Recipients attention Letter (DAL HCBC 0 09/02/2016 Storm Hermine NYSDOH Home Care Emergency Survey Posting for storm Hermine. Alert Recipients HERDS Tropical Storm Provider guidance: preparation for potential impacts of IHANS (Notification System) 09/01/2016 NYSDOH Recipients Advisory Guidance **Tropical Storm Hermine** 0 LeadWeb Commissioners NYSDOH August 2016 Commissioners Letter NYS-ARTF and Accurate Recipients 08/31/2016 Advisory Contact Info on HCS NH Surveillance Letter School Survey Showing notifications sent in the past 30 days. + Newer Older + ServNY **Refresh My Applications**

Newsroom Highlights...



List C

09/27/2016 DAL-NH-16-04 Section 12 - State Enforcem...

Newsletters

09/22/2016 October 2016 Aware Prepare Update

lepartment of Health

Getting into HERDS: Select "Facility"

Select "Facility" and hit Submit

 Note, if you only have facility-level access, you may automatically be sent to the correct page

Health Electronic Response Data Sy	HERDS 3.0 : axs39 () 191 Session idle time expires		
Level Selector			
	Level Selector		
	User Access Level:*	O State	
		Facility	
		Submit	

HERDS "landing page" \rightarrow "Data Entry" tab

Health Electronic Responses	onse Data System (HERI ^{ry Reports}	DS) HERI Sessi	DS 3.0 : axs39 (Facility) 190 Online User(s) on idle time expires in 60 min	About Comments Help
TO DO General Periodic				
			Showing Pages 1-2 N	lumber Of Records Per Page: 5 🔻
Activity	Reporting Organization	Data Entity Organization	• Form	Permission Status
School Drinking Water Lead Free Building Survey	DOH TEST SCHOOL 1	DOH TEST SCHOOL 1	School Drinking Water - Lead Free Building Survey	Save/Submit Not Started
School Drinking Water Lead Free Z TEST PUBLIC SCHOOL Building Survey		Z TEST PUBLIC SCHOOL	School Drinking Water - Lead Free Building Survey	Save/Submit Saved
School Drinking Water Sampling and DOH TEST SCHOOL 1 Results Survey		DOH TEST SCHOOL 1	1: School Drinking Water - Lead Sampling Survey	Save/Submit Not Started
School Drinking Water Sampling and Results Survey	Z TEST PUBLIC SCHOOL	Z TEST PUBLIC SCHOOL	1: School Drinking Water - Lead Sampling Survey	Save/Submit Not Started
School Drinking Water Sampling and Results Survey	DOH TEST SCHOOL 1	DOH TEST SCHOOL 1	2: School Drinking Water - Lead Results Survey	Save/Submit Not Started

Select appropriate activity

• Select one of the activities below

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- If neither appear and you are reporting for a school, then you need the School Lead in Drinking Water Reporter role assigned to you by an HCS Coordinator
- If you are from an LHD and don't see any activities, then you need a role (up to your supervisor) assigned to you, by an HCS Coordinator

	Health Electronic Response Data System (HERDS)							
	Level Selector	Home	Data Ent <mark>ry</mark>	Reports				
	🖃 Data Entry							
			Activity:*	* Please Select Activity	Department			
6	1			School Drinking Water Lead Free Building Survey School Drinking Water Sampling and Results Survey	of Health			

Select your organization and form

Level Selector	Home	Data Ent <mark>ry</mark>	Reports		
Data Entry					
		Activity:	* School Drinking Water Sampling and Results Survey ▼		
Organization:* DOH TEST SCHOOL 1 (010001991111) ▼					
		Form:	* Please Select Form 🔹		
			Please Select Form 1: School Drinking Water - Lead Sampling Survey 2: School Drinking Water - Lead Results Survey		

Note: the Lead Free Building Survey automatically selects the form since there is only one eligible form to choose from

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Review form and organization (school) selection at the top



To Enter Information Regarding Lead Free Buildings

- Select "School Drinking Water Lead Free Building Survey" from the Activity Drop Down menu.
- Scroll down and answer the question and enter any leadfree buildings you may have.
- Click Save All, then Review & Submit, and then Submit your data.



School Drinking Water Lead Free Building Survey



To Enter Information Regarding Sampling for Lead in Drinking Water

- From the Data Entry screen, select "School Drinking Water Sampling and Results Survey" from the Activity Drop Down menu.
- Under Form, Select "1: School Drinking Water Lead Sampling Survey".
- Answer questions 1-5 (required). Answer questions 6 and 7 when applicable. You may return to this form as many times as necessary to update it until all sampling is complete.
- Click Save All, then Review & Submit, and then Submit your data.



1: School Drinking Water- Lead **Sampling** Survey

System		H Home •	My Content •		Search	A neib.
1. Enter the website address where your school water analysis results will be posted.						
apling Numbers						
2. How many total outlets have been identified by the school that require sampling?	(?)					
3. Out of the total number of outlets reported in #2, how many were sampled between 01/01/2015 and 09/06/2016, in a manner that <u>was fully compliant with the regulations</u> , and which had results at or below the action level?	?					
4. Out of the total number of outlets reported in #2, how many were sampled between 01/01/2015 and 09/06/2016, in a manner that <u>did not fully comply with the regulations</u> , which had results at or below the action level, and for which the school has requested a testing waiver?		0		C th	only che his box a	lck and
4a. Of the number of outlets reported in #4, how many outlets have received a waiver from sampling?				fill	in the o	date
5. Of the total number of outlets reported in #2, how many were sampled after 09/06/2016, in a manner that was fully compliant with the regulations?					comple	te
Impling Complete						
6. All outlets have been sampled. All samples have been submitted to an ELAP-approved laboratory for analysis."	?					
7. Enter the date all sampling completed: (MMDD/YYY)						
testation						
licking the 'Submit' button, I attest that all the data entered above is true and correct to the best outatory compliance, and that I am authorized to submit this data on behalf of the school district o	of my kno r BOCES.	wledge, that	l understand that su	uch informa	tion shall be r	used for assessin

To Enter Information Regarding Results of Lead in Drinking Water Testing

- Once you have results to report, from the Data Entry screen, select "School Drinking Water Sampling and Results Survey" from the Activity Drop Down menu.
- Under Form, Select "2: School Drinking Water Lead Results Survey".
- Answer questions 1-5 as applicable. You may return to this form as many times as necessary to update it until all results have been received.
- Click Save All, then Review & Submit, and then Submit your data.

2. School Drinking Water- Lead Results Survey



be used for assessing regulatory compliance, and that I am authorized to submit this data on behalf of the school district or BOCES.

2: School Drinking Water - Lead Results **Review & Submit** Save All Reset Survey Click Save All, then Review & Submit, and then Submit your data.

Troubleshooting



"I don't see any activities in HERDS"

- The individual does not have the School Lead in Drinking Water Reporter role assigned
- They need to work with their HCS Coordinator to have the role assigned

To find your own HCS Coordinator:

- From HCS, click Content , then "Look up my coordinators"



"I have the School Lead in Drinking Water Reporter assigned, but I do not see activities in HERDS"

- Please select **facility** at the Level Selector step
 - The forms must be completed under each individual school
 - If this does not correct the problem, then there may be an error in how the role was assigned. Email <u>lead.in.school.drinking.water@health.ny.gov</u> with a brief description



"I don't see the role to assign" – HCS Coordinator

- The School Lead in Drinking Water Reporter role only exists at the **facility/school level**
- If the HCS Coordinator states that they can't see the role, then they are most likely trying to add it under the District
- Advise them to try adding the role for each individual school



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Additional Materials on HCS Homepage

Important Health Notifications

Posted	Priority	Keyword	Source	Audience	Description	Recipients	
10/27/2016	Advisory	School Lead	NYSDOH		Specific Steps for School Lead in Drinking Water Reporters	Recipients	-
10/19/2016	Advisory	Legionellosis	NYSDOH		Increase in Legionellosis in Lockport, NY	Recipients	
10/19/2016	Advisory	Infectious Disease	NYSDOH		Investigations of Burkholderia cepacia Infections - Updated Recommendations	Recipients	
10/14/2016	Advisory	Infectious Disease	NYSDOH		Non-tuberculous Mycobacterium (NTM) Infections and Heater-Cooler Units	Recipients	
10/12/2016	Advisory	Influenza	NYSDOH		INFLUENZA SURVEILLANCE AND REPORTING REQUIREMENTS, 20162017	Recipients	
10/06/2016	Advisory	Infectious Disease	NYSDOH		Burkholderia cepacia bloodstream infections product recall notice	Recipients	
10/06/2016	Update to	HERDS- new	NYSDOH		HERDS: New School Lead in Drinking Water	Recipients	-
Newer Showing notifications sent in the past 30 days.							

Additional Materials

Specific Steps for School Lead in Drinking Water Reporters:

- 1. General steps to being electronically prepared to report:
 - Obtain an <u>HCS</u> account user must register online and work with their HCS Coordinator
 - i. If you do not know who your HCS Coordinator is, follow these steps:

1. Select My Content -

- 2. Click 'Look up my coordinators'
- 3. A list of HCS Coordinators from your organization will appear.
- b. Have School Lead in Drinking Water Reporter role assigned for each school (not district) you will report under- only HCS Coordinators can assign roles
- c. Log into HCS
- d. Add HERDS to "My Applications" list on HCS

👤 My Content -

- i. Select difference and the All applications from the Main Menu Bar at the top of the screen
- ii. Select "S", then "School Survey (HERDS)" from the applications listed
- iii. Click the green circle with a plus sign on the right of the application name
- iv. Return to Home page
- 2. Sign into HERDS (from HCS) to access and complete the surveys
 - a. Select HERDS from "My Applications"
 - b. Select facility as the "User Access Level", if given an option
 - c. Click on "Data Entry"
 - i. You should see at least 2 activities appear:
 - 1. School Drinking Water Lead Free Building Survey
 - 2. School Drinking Water Sampling and Results Survey
 - Note: if no activities appear, then the role has not yet been assigned to the user, there was an error in assigning the role, or there may be a lag in activation of the assigned role and the user could try again in half an hour
 - d. After selecting an activity, choose the organization you will be reporting under
 - If reporting for more than one school, please be cautious to select the intended school
 - e. After selecting an activity and an organization, choose the form you want to work on
 - i. Only one form for the Lead Free Building Survey
 - iii. Two forms, one on Sampling, and another on Results, under the Sampling and Results Survey
 - f. Confirm the school you planned to report under is listed in the Organization field at the top
 - g. Answer the questions to the best of your ability. Each form can be updated multiple times, as more information is made available.
 - h. After entering information, hit "Save All", then "Review & Submit". If changes need to be made, you can select "Enter or Modify Data" from the review screen. In order to complete the form, you must select "Submit Data" to send it to NYSDOH.
 - i. Be sure to complete the other 2 forms

Instructions for HCS Coordinators on how to assign the School Lead in Drinking Water Reporter Role for individuals in their school(s)

Steps to assign a role in the HCS Communications Directory:

- 1. Click Coordinator's Update Tool
 - To get there:
 - Select MyContent from the top of the screen, then All Applications from the Main Menu Bar
 - o Select C, then Coordinator's Update Tool from the applications listed
 - Click the green circle with a plus sign on the right of the application name (this adds it as a link to your My Applications list on the Home page)
 - Return to Home page
 - o Click on Coordinator's Update Tool from your My Applications list
- 2. Select the appropriate organization
 - Note, this must be at the individual school level. The role will not appear if you select the school district
- THEN,
 - 3. Click Manage Role Assignments (blue tab)

 Click the Modify link located to right of the role name (School Lead in Drinking Water Reporter)

5. Under section 2 (if no one is currently in role) or section 3 (if someone in role), then select the name of the person with an ID you wish to add to the role and click Add Role Assignments. Avoid adding a person to the role if you see an "na" after their name, especially if you know the user has an existing HCS account.

5a. If you cannot locate the person in the list, then proceed to the last option, enter

the person's last name in the Search for Person(s) by name, and click Submit

- 5b. Select the person in the list with a valid user ID
- 6. Click Add Role Assignments.

OR

3. Click Manage People (blue tab)

4. Click on the user's name you want to assign the School Lead in Drinking Water Reporter role to.

4a. If you do not see the user you wish to add in the list, the user may have a Primary Organization with another facility/agency or may have attained an HCS account using their medical license. In that case, you will not see that user in your Manage People. Use instructions above.

5. Click Manage Role Assignments tab

6. Check the box next to the role (School Lead in Drinking Water Reporter) you wish the user to hold

7. Click Revise Role Assignments.

Questions?

For additional assistance, please call the Commerce Trainers at 518-473-1809. You can also call Commerce Accounts Management Unit (CAMU) at 1-866-529-1890.

Thank You!

Additional questions? Ask your local health department representative or email us at: Lead.in.school.drinking.water@health.ny.gov

