MILWAUKEE PUBLIC SCHOOLS

Lead Action Plan

for the

CITY OF MILWAUKEE
HEALTH DEPARTMENT

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The expectation by all parties is that this MPS Lead Action Plan is a living document. It will be updated and edited as new details to all processes, objectives, timetables, and appendices herein become known or fine-tuned. These changes will include a combination of administrative and engineering controls that will be made frequently, and as needed, to ensure that best practices are executed now and in the future. Additionally, long-term and short-term strategies are identified in planning and operations for lead hazard compliance.

Milwaukee Public Schools background and introduction

Milwaukee Public Schools is the largest school district in Wisconsin and is among the oldest. The 17 oldest existing school buildings were opened in the time period from 1882 to 1898; the average age of an MPS school building is 82 years.

Altogether, the district has about 15 million square feet of space at 144 active campuses. All but 11 of those school buildings were constructed before 1978.

Because lead paint was in widespread use prior to 1978, the year the federal government banned its sale, MPS presumes all painted surfaces in schools constructed before 1978 contain lead unless testing proves otherwise.

In response to a 2010 revision of a State of Wisconsin regulation regarding lead in homes, schools, and child-care facilities, MPS created a Lead-Based Paint Compliance Program for all schools that had spaces/classrooms frequently used by children younger than 6 years. MPS environmental staff consulted with the Wisconsin Department of Health Services (DHS) throughout the plan's development to ensure that, at a minimum, it met the 2010 regulatory standard. The final MPS plan was expanded to include work requirements and practices within spaces and schools not covered under the 2010 DHS regulation.

Since the initial development of MPS's lead-based paint program, the U.S. Environmental Protection Agency and Wisconsin Department of Health Services hazard standards for what is termed lead-wipe testing have lowered the thresholds (measured in micrograms per square foot) as follows:

- Floors: From 100 (before 2001) to 40 (from 2001-19) to 10 (2019-21) and, in January 2025, 5 (although DHS has yet to adopt this recent standard and is proposing 2027 adoption if not sooner).

- Windowsills: From 500 (before 2001) to 250 (from 2001-19) to 100 (2019-21) and, as of January 2025, 40 (although DHS has yet to adopt this recent standard and is proposing 2027 adoption if not sooner).
- Indications are that the EPA might move to lower both of these recently revised standards.

To meet the more stringent clearance standards enacted by the EPA and DHS, MPS is investing in additional training for cleaning staff, more personal protective equipment (PPE) for staff, and utilizing other EPA-approved cleaning products and surface sealants.

Summary of Lead Hazard Findings

In January 2025, MHD notified MPS about potential elevated blood lead level (EBLL) investigations raised by parents at Golda Meir School, Kagel School, Milwaukee Academy of Chinese Language (MACL), and Maryland Avenue Montessori School. In February 2025, MHD notified MPS of an investigation at Trowbridge School. MPS cooperated with MHD by closing Trowbridge and addressed the concerns with high levels of urgency by stabilizing painted surfaces through certified painters and by deep cleaning the buildings. In March, Starms Early Childhood Center, Fernwood Montessori, and LaFollette Schools closed to address concerns resulting from visual inspections that showed potential lead hazards. Additionally, inspections occurred at 10 other schools in March; new inspections are ongoing. Initial visual inspection by MHD cleared MACL, and subsequent testing after remediation efforts cleared Trowbridge, Kagel, Golda Meir, Maryland Avenue, and Fernwood.

Priorities Recommended for MPS

After extensive testing and review by MHD of targeted buildings, MPS immediately and significantly adjusted its process for detection, monitoring, and control of lead hazards, with recommendations from MHD. As of March 2025, MPS has two DHS-certified lead-risk assessors, with a third environmental inspector who has completed the training and is taking the necessary actions to attain DHS certification. The current lead-risk assessors have other tasks that support environmental initiatives for the district. In the FY26 budget process, the Administration will seek to add a position for a lead-risk assessor that will solely focus on compliance with MPS's Lead-Based Paint Compliance Program. In addition, MPS will determine the feasibility of additional positions within its long-term plan to increase both lead-safe renovator capacity and internal monitoring of painting activities.

As part of the long-term plan for the Lead-Based Paint Compliance Program (Appendix A), MPS school leaders and building operations staff are performing additional walkthroughs of district buildings. As a local education agency (LEA), MPS has a dedicated certified asbestos inspector who performs cyclic reinspections of asbestos-containing materials to comply with the EPA's Asbestos Hazards Emergency Response Act (AHERA). These periodic asbestos inspections are performed within an EPA-mandated three-year cycle. Short-term planning will include that future reinspections, conducted within all elementary schools, be expanded to include a visual assessment of the building's painted surfaces. The inspector performing this evaluation shall be trained and certified with DHS as both an asbestos inspector and as a lead-risk assessor. This program revision has been implemented beginning January 29, 2025. MPS recognizes the need for a long-term dedicated position for continued maintenance and compliance and will include a proposal in the FY26 budget cycle to add two FTEs to manage the lead program for MPS. One position proposed is a lead-risk assessor and the second would be a field inspector. These staff members would complete future lead paint periodic maintenance inspections, which includes additional staffing beyond the concurrent staffing for asbestos. This is part of the short-term solution. The expectation is that each field inspector could review up to 60 buildings each year and complete the inspections in a suggested three-year cycle.

Additional short-term strategies beyond the added staff proposed above include MPS increasing the work capacity of the MPS Environmental Health team's ability to evaluate building condition by hiring a third-party environmental consultant, who is currently assisting. The consultant is working under the direction of staff within the MPS Environmental Health team. The MPS Environmental Health team evaluates the effectiveness and performance of the contracted vendor. This consultant will use the MHD-created visual inspection checklist, which was reviewed by the Centers for Disease Control and Prevention (CDC), to determine the building condition severity by established ranking protocols in accordance with the checklist in Appendix C. The checklist will be used with Appendix D to stagger dates for preparation, renovating, painting, cleaning, and clearance activities for quicker compliance dates and public transparency. Appendix D will prioritize the scheduling of the schools based on ages of the children, age of the school, and the condition of the lead hazards within the facility. MHD will assist in prioritizing schools to have a schedule of renovation that reflects new schools being inspected to ensure accurate priorities in real time.

MPS will ensure the contractual obligations for the third-party inspection contractor will include the vendors' responsibilities, oversight of projects, and timeliness of completion dates. The contract with the vendors will also include provisions to re-evaluate the effectiveness and moving from inspections to visual risk assessments of MPS school facilities, to better evaluate the severity of the buildings' conditions.

The scope of work for the third-party environmental consultant includes surveying all MPS elementary schools constructed before 1978 to identify the locations of any deteriorated paint within each space. Survey reports generated by the consultant are used by MPS staff to develop a stabilization program to repair the identified deteriorated areas. (Appendix B: Tier 1, 2, 3 Paint Assessment Survey Schedule – Consultant Visual Inspection Schedule). The visual inspection report is being modified to include criteria that will identify the percentages of deterioration of the components inspected within a room (Appendix C.1): MPS Paint Survey Form. The component criteria will generate a clear picture of priority rooms within the building and allow for a comprehensive review of the building finishes by component and align with the MHD MPS Revised Visual Inspection form and subsequent categorization into scheduling within Appendix D.

Furthermore, MPS has been scheduling building walkthroughs with MHD to assess dust levels and potential paint deterioration. The goal is to ensure MPS schools are lead safe as defined in DHS 163. The MPS project leader who is certified as an LSR or LRA will visually verify that the entire scope of work has been satisfactorily completed, utilizing the LBP 200 checklists in Appendix N and completed per DHS 163. Based on consultation with MHD, MHD may offer to do confirmational dust wipes to clear the partially closed or fully closed facility that is not child occupied. For child-occupied facilities, MHD will perform clearances after MPS visual confirmation of completion. MPS will have certified lead-safe renovators supervise projects for quality control and develop written standard operating procedures for staff involved in triaging the work orders, communicating the work orders to school staff, the areas of the work, the expected timetables for completion, any notification procedures for parents and DHS, enforcing noncompliance, and ensuring accountability to prevent delays, clearance failures, transparency, and poor workmanship.

The glossary in this report clearly defines the following terms: *paint touchup, minor paint stabilization, major paint stabilization,* and *lead abatement*, used within its facilities. MPS procured lead-paint stabilizer and distributed it across the district to building operations staff who are assigned to pre-1978 schools. Using this product, staff performed paint touchup, limited to repairs that do not require training and certification as a lead-safe renovator—specifically, activities that do not generate paint chips, dust, or other debris as a part of the paint touchup process. Building engineers can perform temporary remedies but cannot prepare surfaces without certification. Where building engineers observe debris, they will use HEPA vacuums to remove it; HEPA vacuums are available for every school built before 1978. See Appendix A for the HEPA vacuum maintenance policy for use, cleaning, and disposal of lead waste.

As the inspections and walkthroughs are performed and if remediation efforts are required, a work order will be entered into the MPS maintenance system to complete

the necessary work using appropriately trained and certified tradespersons. MPS will ensure and communicate to the school staff that the work orders are completed and correctly updated within its system via a reporting system that is being further developed and refined. When the repairs disturb the paint substrate in such a way that it will result in creating paint chips or debris, work shall be conducted by a certified lead-safe renovator who will prepare surfaces and stabilize them in accordance with state statute 254.11-254.178 and Wisconsin Administrative Code DHS 163. All work of this type shall comply with DHS 163 and all uncertified workers shall be trained and work under the direction of a lead-safe renovator (LSR).

MPS has certified lead-safe renovators on staff to oversee work subject to DHS 163. To increase workforce capacity, MPS currently has firms under contract to provide contract laborers. The work of contracted laborers shall be coordinated by MPS trade personnel. MPS trade personnel inspect and evaluate the contracted laborers' work and performance. MPS will increase contractor capacity to address the immediate stabilization efforts for emergency lead paint renovations to prepare for the start of the 2025-26 school year. The work associated with the emergency work will provide training for continued maintenance on a scheduled basis. MPS will provide ongoing and periodic training in accordance with a schedule for all staff involved in lead-disturbing activities to include precautions for cleaning, painting, renovating, and abatement. The training will emphasize the existing posting of information to identify the presence of lead, which is located in the building engineer’s area and in the main entrance of each building. MPS will evaluate long-term planning with a cost benefit analysis to determine the best options for lead paint removal, lead paint encapsulation, lead paint abatement of high-impact surfaces, or divestment and closure of schools. By August 1, 2025, MPS will create a detailed surveillance protocol to guide school engineers in performing consistent and effective inspections in accordance with the Chapter 6 HUD guidelines, which outlines the standards for conducting visual risk assessments, and clearance evaluations conducted by certified professionals. MPS will evaluate their surveillance protocol annually between January and March, to ensure adjustments are made to align with spring in-service and summer cleaning. The development of the surveillance protocol and review would be the responsibility of the various department leads in the Department of Facilities and Maintenance Services, who would provide the review to the DFMS Senior Director.

MPS will continue use of the Building Condition Checklist, which building engineers and principals use each summer to identify areas of the facility that require repairs or additional attention (see Appendix J). The building tour and checklist will provide an additional opportunity for deteriorated paint to be identified and reported for repairs. All staff in a building will be trained to continue notifying the building engineer of issues they might see so that appropriate repairs or work orders for repairs can be entered.

Revised and Strengthened MPS Lead-Based Paint Compliance Program

- MPS has consulted with DHS and MHD to enhance its plan and ensure it meets or exceeds compliance with state and federal statutes, while minimizing health risks to students and staff. DHS 163 is designed to protect children from hazardous lead exposure during building renovation or lead-hazard reduction activities. The district reviewed and revised the MPS Lead-Based Paint Compliance Program to include clearly identified inspection timetables and protocols. The district will maintain appropriate documentation.
- MPS has established a preliminary, phased timetable in consultation with the Milwaukee Health Department for immediate lead remediation and long-term preventive strategies based on risk level and building conditions. As discussed above, MPS will use Appendix C (MHD visual checklists) to ascertain the building condition and then provide it to MHD to prioritize the staggered schedule sequencing of schools with Appendix D. The schedule will include four statuses of prepping, renovating, painting, and cleaning with expected visual clearance dates. The status terms are defined in the glossary. The district will identify high-priority schools, with the goal of completing lead remediation at these schools before the start of the 2025-26 school year. Some schools, based on inspection and priority, will be completed before the end of the current school year. MPS will have the protocol reviewed annually at the end of the school year by the Department of Facilities and Maintenance managers for summer planning and renovations. Furthermore, MPS is reviewing its facilities and maintenance budget to commit additional funding. Last, MPS is coordinating with its Grants Department to seek federal or state grants to address lead-based paint issues. (Appendix D: Elem Prioritization Schedule)
- The Tier 1 paint assessment schedule, which is based on the age of buildings, is being completed by MPS contracted environmental consultants.
- As the district receives information from the MPS environmental inspector, contracted environmental consultants, and Milwaukee Health Department, MPS is committing resources to address any potential remediation efforts.
- Note that dust generated from any painted surface in a pre-1978 building might contain lead in lower quantities that can still create a hazard. Employees shall be trained to treat all dust generated from such activities as potentially hazardous and shall control such using HEPA-equipped tools and/or a HEPA vacuum.
- Lead activities subject to DHS 163 shall be constantly monitored by a lead-safe renovator (LSR) who will be on site at all times while work is in progress. LSR shall ensure that all procedures and practices meet DHS 163 requirements. Work

that does not meet appropriate standards shall be immediately halted and corrected by the vendor and confirmed by MPS staff trained as an LSR or risk assessor. See Appendix N: LBP Forms for forms detailing accepted practices and documentation. All work subject to DHS 163 shall be verified using Swiffer wipes, using the Cleaning Verification Card per DHS 163 protocols (1 wipe per 40 square feet of affected surfaces).

Prioritizing High-Risk Facilities for Testing and Remediation

MPS has and will continue inspecting facilities based on:

- Priority**:** case investigation of child with blood lead level above 15mg/dL
- Pre-1978 construction
- MHD ranking based on building conditions
- Buildings regularly attended by children younger than 6
- Areas greater than 6 sq ft that require regulated renovation activities

Buildings constructed before 1978 presumably contain lead-based paint and associated hazards. Note that due to voluntary reductions in lead-paint concentration, buildings constructed prior to 1950 are potentially more hazardous than buildings constructed from 1951 to 1978. In addition, if MPS is notified of an elevated blood lead level case, MHD may investigate the child's school per its standard case investigation procedures.

As a part of its current Lead-Based Paint Program, MPS presumes all painted surfaces contain lead in pre-1978 buildings unless one of the following is performed:

1. A lead inspection or risk assessment, completed by certified individuals, has verified that a surface is lead free.
2. When access to an MPS-purchased handheld/portable X-ray fluorescent (XRF) is not available, a certified lead-safe renovator, inspector, or risk assessor has used an EPA-approved lead test kit to demonstrate that the painted surface does not contain lead, which will eliminate the need to follow DHS 163 for work.
3. The painted surface has been tested using an XRF analyzer to measure elemental composition of materials potentially containing lead.

- Per the definition of child-occupied facility per DHS 163.03(12): Children under 6 are at increased risk of lead poisoning and its effects due to a combination of biophysiological factors (such as their size and metabolic rate) and behavioral

characteristics (including play habits and hand-to-mouth behavior). MPS previously worked with DHS to create a comprehensive Lead Based Paint Plan for child-occupied facilities. MPS is evaluating facilities with porous concrete surfaces typically at ground levels. If classrooms with this surface have children under the age of 6, MPS will relocate the students to other floors.

- Facilities with a previous record of deterioration, especially peeling or chipping paint, might expose children to hazardous lead dust and shall be considered of the highest priority with respect to stabilization and, if needed, remediation. As part of working with MHD and DHS, MPS is collaboratively reviewing painted surfaces, especially areas in child-occupied facilities or classrooms that have students with pervasive developmental disorders. MPS will develop a protocol and communication plan by the end of June 2025 to alert parents and teachers of the known lead hazards internally for initiation of a complaint, timetable for work order, and completion of work to be done. This communication plan will be reviewed annually at the start of the school year by the communications team.

Fully Abate and/or Control Identified Lead Hazards Based on MHD Inspection Results

Any confirmed lead hazards are being addressed through state-certified lead abatement or lead-safe renovation workers. As the inspections and walkthroughs are performed and if remediation efforts are required, a work order will be entered into the maintenance system to have certified tradespersons complete the necessary work. **Work disturbing lead-based paint shall only be conducted in isolated, contained, and unoccupied spaces,** in accordance with DHS 163. Due to the extent of lead hazards known to exist, MPS will require that all contractors have lead-awareness training and/or lead-safe work practice training. MPS will inform all contractors, vendors, and workers of the presence of lead and potential risks of any lead-based paint, not just surfaces classified as lead-based paint. MPS contract specifications and documents will include these requirements. MPS will have contracted moving companies or laborers removing items from a space as needed so the painters and lead-safe renovators can properly perform their tasks using polyurethane tarps, PPE, HEPA vacuums, wet wipes, and other needed materials. MPS will provide moving service contractors with documentation that will explain lead awareness via written documentation and voluntary video links. Once tasks are completed, all horizontal surfaces in the space will be cleaned. All items for the space will be properly cleaned before being returned.

Temporary School-Building Closure Plan

• **For a full school-building closure:** This action will be taken when visual inspection checklists indicate that more than 50% of painted surfaces or greater than 50% of the rooms are subject to DHS 163, in accordance with the criteria outlined in Appendix C. MPS will make every attempt to avoid disruptions to families with schools that need full closures. Additional factors that could change the status from a full closure to a partial closure will include the availability of newer constructed areas of the building, enrollment levels, level of remediation necessary, and timetable for completion. MPS will close school buildings and relocate students and staff to address the schools' lead hazards with minimal disruption to teaching and learning. The district has identified underutilized locations for short-term relocation or other facilities that have been inspected and are lead safe, as defined in the glossary. The temporary location will be supplied with necessary classroom furniture, materials, technology, and incidentals. Services for the relocated school will be provided at the temporary location, including school nutrition, transportation, specialized services, and access to the school's telephone number. During the relocation, all school furniture, materials, personal belongings, etc., will remain at the closed site as a precautionary measure. Access to the facility will be allowed only to certified and/or trained MPS personnel or contractors for remediation efforts. Signage will be displayed at the facilities' entrances. Until MHD provides clearance, the general public will not have access. Dates for prepping, renovating, painting, and cleaning will be documented in the spreadsheets included in Appendix D.

• **For a partial school-building closure:** This action will be taken when visual inspection checklists indicate that between 10% and 50% of painted surfaces are deteriorated, in accordance with the criteria outlined in Appendix C. MPS will close a portion of a school building and relocate students and staff within the school or off campus to address the school's lead hazards with minimal disruption to teaching and learning. MPS will attempt to provide access for screening clinics for these schools in advance of the partial closure. MPS will follow MHD's recommendations if spaces need to be closed off to the remaining building occupants. The temporary location will be supplied with necessary classroom furniture, materials, technology, etc. During the move, all school furniture, materials, personal belongings, etc., will remain at the partially closed site within the contained areas as a precaution. Access to the closed area will be allowed only to certified and/or trained MPS personnel or contractors for remediation efforts. MPS will have a partial inspection project plan for each school that will delineate controlled access and exiting, interim controls, location of sticky mats, warning signage, notification to school staff, timetables for completion of various stages, and emergency contact info. Signage will be displayed within the facility at all times

during renovation activities. Until MHD provides clearance, the general public will not have access. Dates for prepping, renovating, painting, and cleaning will be documented in the spreadsheets included in Appendix D.

- Criteria for partial closure:
    - Low enrollment and available space
    - Low lead exposure from screening rates
    - Interim controls in place during process such as added cleaning, use of tacky mats, sealing the floors of rooms that are occupied
    - Plan reviewed and approved by MHD identifies child areas, certified staff areas, interior pathways, etc.

Review and update cleaning and lead-dust prevention protocols

MPS recognizes that lead dust can be generated from various non-renovation sources, especially those generated from friction on a surface and impacts to surfaces. Lead dust can also be transferred from space to space via foot traffic from areas not normally accessed by students, such as mechanical rooms. To address this, MPS is modifying various practices and procedures to reduce the amount of dust generated and work to remove any dust that is generated.

- Based on collaboration with independent restoration companies, the district has adjusted its practices for cleaning of all horizontal surfaces within a child's reach (e.g., floors, sills, bookshelves). MPS shall implement a more rigorous cleaning schedule that meets MHD expectations, which includes documentation and verification, during spring, summer, and winter breaks. Areas will be cleaned in accordance with the protocol in Appendix F or G. MPS will immediately look at staffing levels needed to increase the cleaning duration of higher-risk areas such as corridors, lunchrooms, and bathrooms for special needs children and common or communal areas for children under 6. For long-term planning, MPS will evaluate the areas of children over 6 and frequency of daily and/or weekly cleaning. MPS will prioritize the sealing of all porous surfaces included concrete and tile immediately for the short-term plan during the timetables for renovation per Appendix D. The school engineer will verify effective cleaning measures every morning.
- The district is working to remove nonessential items from its classrooms and other areas to allow more efficient and thorough cleaning.
- MPS custodial staff will follow standard operating procedures for cleaning, employing more effective methods that will include longer durations, additional

staffing, and other methods. MPS has a protocol for daily cleaning (Appendix E), protocols for enhanced dust removal/cleaning (Appendix F), in addition to sealing floors of wood, concrete and tile, Appendix G provides the protocols used for summer/project cleaning.

- All MPS staff will be trained on how to recognize and inform building engineers of any deteriorating paint to ensure that corrective actions occur. The standard MPS staff handbook and manual will be updated to reflect the training needs of lead safety and reporting, and be reviewed annually and included before the end of the school year by the Department of Facilities and Maintenance Services.
- When corrective actions are appropriate, the MPS project leader, who is trained and certified as an LSR or LRA will determine the type of corrective action needed, such as touchup, minor paint stabilization, or major paint stabilization.
- MPS will provide specific examples of acceptable engineering controls and administrative controls used in Appendix F for cleaning, painting, and renovating activities so that staff use them consistently and effectively. In areas that are not accessed by children under 6 in child-occupied facilities, such as attics, boiler rooms, storage closets, utility spaces, and other auxiliary rooms, MPS will place “sticky” mats at entrances to prevent migration of dust from these spaces through the building.
- MPS has a visual assessment checklist and a summer cleaning protocol, which will identify issues that will need to be addressed.
- MPS is updating cleaning procedures to include more frequent and aggressive cleaning techniques of porous surfaces such as concrete or ceramic tile floors. Mitigation efforts will include applying floor sealants to reduce porosity of the surface.
- All areas are cleaned once a day. The FY26 budget includes a request for additional cleaning staff, which will allow for increased cleaning time for each room.
- Work that will occur during the 2024-25 school year and through the anticipated completion date of March 2026 to prioritize the lowest grades first will include:
    - Basic touchup of damaged paint areas
    - Minor and major paint stabilization by individuals trained and certified per DHS 163
    - Followed by thorough cleaning of the rooms
    - New cleaning protocols
    - Strategic placement of sticky floor pads at the exits of spaces such as mechanical rooms and utility spaces
    - Publicly posted information for parents to see how their school is progressing and which schools are planned for relocations based on Appendix D

    - Creation of an after-hours or weekend crew for emergency repairs
- Increased emphasis on daily cleaning and changing of building air filters will minimize the accumulation of dust, including lead dust.
- Further efforts to mitigate the development of dust and damage to paint will be included in the discussions for the Long-Range Facilities Master Plan, which may include the following:
    - Permanently securing doors and drawers on painted built-in cabinets.
    - Replacing painted wood base shoe with new rubber base along floors, using appropriate methods for compliance with DHS 163.
    - Installation of wall corner guards and chair rails.
    - Laminating the tops of windowsills.
    - Continued paint touchup allowed by building engineers when impact damage occurs.
    - Permanent replacement of doors, trim, and other high-impact, lead-painted surfaces.
    - Plastic laminate on specific surfaces due frequency of use (bookshelves).
    - School district protocols to fix or prevent furniture movement by staff.
    - School district protocols to prevent hanging of items on walls that can disturb surfaces.
    - School district protocols to prevent sitting on concrete floors for children under 6 or installation of non-porous flooring such as vinyl composition tile.
    - School district protocols to increase behavioral controls such as frequent hand washing before consumption of foods for certain areas.
    - Right sizing staffing for effective cleaning protocols.

- The district will address lead paint issues as part of the Long-Range Facilities Master Plan that is projected to be completed by the end of 2025. MPS will share the Long-Range Facilities Master Plan with MHD for comment and advisement. Lead paint will be included as a factor for the Facility Condition Index score and inform other decisions such as those regarding program locations, more frequent lead-hazard education to all staff, increasing frequency of cleaning, and level of cleaning. This plan will also cover deep cleaning of surfaces, periodic cleanings, abatement of high-impact surfaces, friction surfaces, and divestment.
- MPS will utilize updated cleaning protocols to reduce contact with contaminated surfaces by students who use classroom floors as an integral part of the instruction delivery method, as at Montessori schools. MPS can provide guidance on classroom setup that would locate floor activities away from areas of elevated concern, such as windows and radiators. In addition, staff are being instructed to

be proactive in reporting any potential hazards in their classrooms per the standard MPS Handbook section 7.43.

Review existing DHS lead-safe certifications and identify training needs among staff

MPS shall continue to ensure that all training and certification requirements regarding lead-based paint are maintained. These certifications shall include:

- Lead company certification for MPS and any contractors/consultants who provide services regarding lead-based paint and lead in water.
- Lead-safe renovators and, as necessary, lead inspectors, lead-risk assessors, lead-abatement workers, and lead-abatement supervisors for MPS staff and contractors/consultants, as required under DHS 163.
- MPS will maintain its state certification as a Lead Company.
- MPS currently has several maintenance staff certified as lead-safe renovators and two lead-risk assessors whose primary duty is to maintain the MPS asbestos program mandated under EPA AHERA. MPS is moving to improve its capacity to detect lead hazards by acquiring the services of certified lead inspectors and/or lead-risk assessors who are dedicated to its lead management program. In March, MPS trained an additional lead-risk assessor.
- MPS will enhance onboarding for new building service helpers and provide additional, enhanced training for current building service helpers.
- MPS is pursuing increased budget allocations in these areas to create a position for a dedicated lead-risk assessor and also a field assistant.

Addressing lead hazards from water sources

- As part of its standard operating procedures, MPS has its own water filtration plan. (Appendix I: SOP – Drinking Fountains)
- On the recommendation of MHD, MPS will immediately restrict access to water fixtures used for drinking, food preparation, or medical care if they are found to have lead levels above 10 parts per billion. MPS will continue to evaluate and remediate all taps and fixtures until the lowest possible level of lead is achieved, with priority given to those serving infants, children under 6, and pregnant women. MPS has developed a drinking water filter replacement standard operating procedure and will use signage to ensure drinking water safety for lead hazards. (Appendix I).
- MHD has taken water samples from MPS schools, and results received to date indicate **all drinking fountains dispensed water that meets current EPA**

policy lead-level standards for water fixtures and plumbing. By 2016, lead laterals connecting schools to city water mains were removed. Additionally, in 2016 and 2017, MPS tested potable water fixtures in the district and found over 94% of the fixtures passed EPA standards. The remaining 6% were replaced. All drinking fountains are equipped with water filters that are replaced every 12 months or earlier, if indicated by usage, to ensure they are effective and in full accordance with manufacturer guidance.

- Drinking-water test results are lower than the 5 parts per billion in the proposed State of Wisconsin bill LRB-0452 for 2027, which would be required in private and public schools. Water filters proactively installed in 2017 are working as designed and are maintained as required. MPS is exploring partnering with Milwaukee Waterworks as part of the utility's citywide testing plan.
- MPS will establish an internal communication and lead-awareness training for specific staff that includes teachers, renovators, and custodial staff. The lead-awareness training will include the training, protocols, and policies for documenting training and an internal complaint process for reporting potential hazards.

Protecting students at increased risk of ingestion

- Children under 6 are especially susceptible to lead exposure because of their rapidly developing brains and nervous systems, which absorb lead more efficiently than those of older children. They are also more likely to engage in hand-to-mouth behaviors that increase the risk of ingesting contaminated dust or paint chips. While Wisconsin state statutes generally use age 6 as the threshold for increased risk, both academic research and MHD observation indicate that certain children may remain at risk beyond this age due to clinical or behavioral factors. Children with conditions such as autism or sickle cell disease may display pica behaviors (eating non-food items), which significantly increases the risk of ingesting lead. Nutritional deficiencies can further elevate lead absorption.
- MPS recognizes these risks and is working to ensure that protective measures extend to all students who might face increased susceptibility. In consultation with subject matter experts, MPS has begun reclassifying classrooms and modifying cleaning methods to prevent exposure to lead paint and dust hazards.
- For children with certain clinical risk factors to be included in its child-occupied facilities program, MPS will follow DHS 163 for the areas defined as a child-occupied facility. MPS has modified cleaning methods to meet expectations.
- The district is reviewing classroom design and materials to support safe floor-based learning environments, reduce carpeting, and limit contact with surfaces that might contain lead dust or deteriorated paint. Additionally, MPS is evaluating

classroom assignments to further reduce ingestion risks. Students identified as higher risk may be relocated to rooms that are less likely to contain lead hazards, such as those on upper floors or in newer parts of buildings.

- MPS is examining its districtwide use of buildings and current utilization to relocate classrooms for children under 6 to rooms that do not have exposed concrete floors and/or to rooms that are not located on the ground floor/basement level.
- MPS acknowledges a need to increase screenings of children for lead poisoning and is committed to collaborating with health care providers to schedule more screenings. The Department of Specialized Services along with community health partners will develop a plan by August 1, to implement when students return in September. In addition, MPS recognizes the urgency for screenings and will participate in screening clinics over the summer.
- MPS is working with MHD and health care providers to expand access to blood lead testing, focusing on students at higher risk of exposure, in order to improve early detection and response to lead poisoning.

MPS's Responsibility

Under Wisconsin Administrative Codes PI 8.02(2)(i), it is stated, "Maintenance procedures and custodial services shall be conducted in such a manner that the safety and health of persons using the facilities are protected." Additionally, Wisconsin Administrative Code 121.02 (i) under school district standards states, "provide safe and healthful facilities. The facilities shall comply with ss. 254.11 to 254.178 and any rule promulgated under those sections." MPS shall proactively perform selective air monitoring of custodial staff to determine negative exposure assessments and, if needed, reactive blood testing of custodial staff.

MHD does not routinely inspect schools; however, it inspects schools whenever a lead hazard concern is reported through an elevated blood lead level case investigation. Due to confirmed lead hazards in select MPS facilities, MPS anticipates that MHD will continue monitoring these cases and, when needed, identify prompt corrective action from MPS leadership. MPS has been working closely with MHD and DHS, addressing their recommendations along with subject matter experts.

MPS currently monitors trade staff who are involved with activities that would disturb lead-based paint. MPS has evaluated trade staff, and negative-exposure monitoring reporting indicates air inhalation exposure below the level of detection. MPS is taking steps to extend such testing to additional custodial staff in May 2025. If an MPS staff member were to have a concern and requested monitoring, MPS would offer exposure

testing. MPS reviewed this process with the Wisconsin Department of Safety and Professional Services, which has jurisdiction over the safety of public employees.

Next Steps

MPS has taken immediate action based on MHD's recommendations to remediate dangers to ensure a safe environment for students and staff. Although early remediation efforts have been completed, MPS continues to coordinate with MHD to address concerns, per their consultation and technical assistance.

A schedule has been developed for a comprehensive visual inspection of each elementary school site based on the building's age (Appendix B).

A preliminary schedule for stabilization of the schools has been developed based on the prioritized list identified by MHD, combined with input from MPS. The schedule will be updated as visual inspections for buildings are completed and paint conditions identified. As buildings with a higher level of severity are identified, the intent is to adjust the schedule accordingly to address those with the greatest need sooner. A tentative completion date of March 2026 is projected for the stabilization process (Appendix D).

MPS will develop a detailed scope of work for each site, so that the work is clearly identified and aligned with the schedule, addressing buildings with the highest need. As buildings are identified that require partial or full closure based on established criteria, the schedule will be updated to address these sites in an order that aligns with severity. When the severity of deterioration is identified such that full closure is warranted, the district will relocate the program and/or move to virtual schooling if no temporary site is available.

The district has identified three locations for use as temporary sites and will be developing others as needed. Current sites available include Andrew S. Douglas Middle School, Wisconsin Conservatory of Lifelong Learning, and South Division High School. Where feasible, the district will relocate students to areas of their existing building, such as in newer building additions or areas of the building with no deterioration. When space within a facility is not available for internal shifts, the classrooms will be relocated to the temporary sites identified above.

Communications Action

MPS informs district families and staff of lead developments through a multipronged approach. These are the actions implemented thus far:

- A webpage was launched in February on the MPS website with lead updates and other information from the district, such as lead-free-water information. The webpage is updated whenever new information is available. The page also links to resources from the Milwaukee Health Department to help families navigate health concerns. A button to the MPS Lead Report webpage is in a prominent position on the MPS home page.
- MPS will develop a lead-awareness training plan for teachers and custodial staff via instructional pamphlets and/or links to online videos.
- The Department of Communications, in collaboration with the Milwaukee Health Department, issues letters to families and staff as needed when new developments arise, such as findings of lead hazards, clearances, school closures, and school reopening.
- Communications posts articles on the district home page about significant developments.
- Communications provides information to the news media to assist with dissemination of developments.
- MPS will establish signage warning staff of lead-based paint hazards and lead-dust exposure.
- An updated method for notifying staff and parents of work subject to DHS 163 and issuance of an LBP-100 form and access to the *Renovate Right* pamphlet has been developed. The district will use the standard SchoolMessenger communication platform that is familiar to staff and families to share these notifications. MPS will establish the steps to document that a parent received the pamphlet and retain records of the notification, which can include written confirmation, electronic communication, electronic signatures, or read receipts.

Communications Recommendations

- Hold town hall meetings for families seeking more information.
- Conduct tours of remedied school buildings for families who want visual reassurance of remedies performed on schools. The tours could be in person or virtual.

High Priority School Stabilization Schedule Assumptions and Explanation

Appendix D shall be used as a tentative schedule for addressing deteriorated lead within district facilities.

MPS is utilizing the list from the Milwaukee Health Department, which has prioritized the schools based on a combination of environmental and clinical risk factors. The order of priority for these sites in general aligns fairly closely to the visual inspection schedule that MPS started in February, which was based on the age of the building.

The visual inspections have provided additional guidance to identify a building condition status. The building condition status is assisting with prioritizing stabilization activities. When a site is identified as a higher priority based on criteria of deterioration, it will be reviewed against the original list, and schools in the MHD list will be shifted up or down to accommodate the changes.

The intent is to keep the in-house and third-party crews that are addressing the stabilization process working consistently and efficiently. Therefore, the schedule has built into it time to prepare the building, *prep*, which includes moving furniture away from walls or removing it from the space. The *paint renovation* process will be included when the work will exceed 6 s.f. and requires a work process that adheres to DHS 163 by a trained lead-safe renovator (LSR). The “paint stabilization” process identifies when the in-house or third-party trained lead-safe renovators (LSR) would address the issues of deteriorated paint (paint stabilization). The *clean* process is when the district would engage in a thorough cleaning of all areas addressed under this process.

If a site requires more time than anticipated, the schedule will shift, or additional resources will need to be identified. Conversely, if a space requires less time than anticipated for renovations, the project will be completed sooner. The goal is to complete the work sooner and gain time in the schedule to complete the work early.

Glossary of Terms

- Cleaning – (Used in Appendix D) Any activity used to reduce the accumulation of dust and or debris in an area where a lead dust hazard has been identified, or a Paint Renovation activity is ongoing or has been completed.
- Color Card Cleaning Verification – the use of a Swiffer cleaning cloth on a horizontal surface to verify successful cleaning after a Major Paint Stabilization project. The cloth is visually compared against a DHS color card to ensure that post−renovation cleaning has been successfully completed to the standard set under DHS 163.
- Encapsulation - means the process of creating a barrier between lead-based paint and the environment by the application of an encapsulant.
- Friction Impact Surface – means an interior or exterior surface that is subject to repeated abrasion or friction during use, including certain surfaces of windows, doors, floors and stairs.
- HEPA filter – means a high-efficiency particulate air filter that captures particles of 0.3 microns or larger at 99.97 percent or greater efficiency.
- HEPA vacuum – means a vacuum cleaner designed by the manufacturer to have a high−efficiency particulate air (HEPA) filter as the last filtration stage. The vacuum cleaner must be designed so that all the air drawn into the machine is expelled through the HEPA filter with none of the air leaking past it.
- Impact Surface – means an interior or exterior surface that is subject to damage by repeated force, such as doorframes, cabinet frames and walls subject to door actions, and baseboards and stair risers.
- Lead Abatement/Abatement – Measures to permanently remove lead paint hazards from building components, soils, and fixtures. Methods can include encapsulation, enclosure or removal.
- Lead Abatement Supervisor – means a DHS certified individual who supervises or performs lead abatement or other lead hazard reduction activities.
- Lead Abatement Worker – means a DHS certified individual who performs lead abatement or other lead hazard reduction activities.
- Lead Company – means a company, partnership, corporation, sole proprietorship, association, governmental agency or other entity that performs, supervises, advertises, claims to provide, or offers to perform or supervise a lead hazard reduction activity or lead investigation activity.
- Lead Free – means a lead investigation activity conducted to determine whether a dwelling, dwelling unit, child-occupied facility or other premises qualifies for a certificate of lead-free status. Lead free indicates no lead paint present within the building.

- Lead Hazard – means any substance, surface or object that contains lead and that, due to its condition, location or nature, may contribute to the lead poisoning or lead exposure of a child under 6 years of age.
- Lead Inspection – means the on-site, surface-by-surface investigation of painted, varnished or other coated surfaces to determine the presence of lead.
- Lead Inspector – means a DHS certified individual who conducts a lead−free inspection, or lead inspection and who may also conduct clearance activities.
- Lead Paint Abatement – means any measure or set of measures intended to permanently eliminate lead−based paint hazards via component removal, chemical stripping, encapsulation, or enclosure. It does not include any level of simple Paint Stabilization. Such work shall only be conducted by individuals trained and certified as Lead Worker or Lead Supervisor.
- Lead Risk Assessor – means a DHS certified individual who conducts lead investigation activities.
- Lead Safe – a term used to denote a space or building that has no observable lead-based paint hazards present
- Lead Safe Renovator – means a DHS certified individual who performs or directs workers who perform renovation activities in target housing or child−occupied facilities.
- Major Paint Stabilization – as Minor Paint Stabilization except that the disturbance of lead-based paint exceeds 6 square feet within a given interior space or 20 square feet on a building's exterior. Such work shall only be performed by individuals trained and certified by DHS as lead-safe renovators (LSR) and conform to all requirements set forth under DHS 163.
- Minor Paint Stabilization – the application of paint to a surface that will only involve minimal paint disturbance of no more than 6 square feet within a single interior space, no more than 20 square feet on a building's exterior, and does not include the removal of any window components. Includes removal of small amounts of paint chips or dust generated by the activity using a HEPA vacuum.
- Paint – (used in Appendix D) refers to a pigmented liquid substance or other coating that is applied to a surface for decorative, protective, or functional purposes, which naturally dries or cures into a solid film. Such includes paints and other protective finishes such as varnishes, enamels, and sealants.
- Paint Renovation – means any work activity that impacts a painted surface other than Lead Paint Abatement. Such activities include Paint Touchup, Minor Paint Stabilization, and Major Paint Stabilization.
- Paint Touchup – (Used in Appendix D) the application of paint to a surface using a brush or roller only and does not require removal, scraping, or any other disturbance of the existing painted surface.

- Prep/Prepping – (used in Appendix D) any preparation of an area prior to conducting a Lead Renovation activity, including but not limited to clutter reduction, furniture relocation, surface precleaning, etc.
- Renovation Activities – see Paint Renovation
- Third Party – a group or vendor that is not part of MPS staff
- Visual Clearance – a visual examination following an activity that disturbs lead-based paint to determine whether the cleanup has been successfully completed, as indicated by the absence of visible residue, dust and debris, and that scheduled work has been completed.
- Visual Risk Assessment – a protocol developed jointly by MHD and MPS, and reviewed by the CDC, to quickly ascertain the level of lead-based paint hazards for determining facility timetables for compliance.

Appendices

Appendix A: Lead-Based Paint Compliance Program

Appendix B: Tiers 1, 2, 3 Paint Assessment Survey Schedule / Inspection Cycle

Appendix C: MHD MPS Visual Inspection Form

Appendix D: High-Priority School Stabilization Schedule

Appendix E: MPS SOP Daily Cleaning

Appendix F: MPS SOP Enhanced Dust Cleaning

Appendix G: MPS SOP Summer/Project Cleaning Appendix

Appendix H: Current Certified Lead Company Certificate

Appendix I: SOP – Drinking Fountains

Appendix J: Building Condition Checklist

Appendix K: Lead in Water Recommendations

Appendix L: Lead Investigation Overview

Appendix M: Understanding Lead Standards

Appendix N: Lead Based Paint Forms