MILWAUKEE PUBLIC SCHOOLS

Lead Action Plan: Summary

for the

CITY OF MILWAUKEE HEALTH DEPARTMENT

A Letter from District Leadership

Dear MPS Community,

We recognize the deep concern and frustration that many families, educators, and community members are feeling. The health and safety of Milwaukee's children must always come first—and when that trust is shaken, it's our responsibility to respond swiftly, transparently, and effectively.

In January 2025, the City of Milwaukee Health Department (MHD) identified peeling lead-based paint and lead dust hazards in multiple Milwaukee Public Schools (MPS) while investigating a limited number of cases of childhood lead poisoning. The discovery of environmental lead hazards in school settings raises urgent and serious concerns about student safety and the effectiveness of past inspection, maintenance, and renovation efforts.

Although MPS had policies and procedures in place intended to prevent these hazards, those systems did not function as they should have. That is unacceptable.

To get back on track, MPS has launched a coordinated short-term response to assess, stabilize, and remediate hazards across all schools. This work includes:

- Immediate visual inspections and environmental sampling in every school building built before 1978 serving elementary students
- Enhanced environmental controls in high-risk areas
- Temporary school or room relocations when necessary
- Clearer, more frequent communication with families and staff
- Expanded access to blood lead testing and support services

In this plan, these short-term actions are paired with long-term improvements that include new standard operating procedures, workforce training, and stronger accountability structures to prevent future failures.

MHD will continue providing public health oversight and conducting environmental investigations to ensure hazards are fully identified and addressed. They will support the district's efforts by performing clearance inspections, advising on testing protocols, and coordinating community blood lead screening efforts.

With continued guidance from MHD and support from our community partners, we will ensure every child has a safe place to learn and grow. MPS will continue to communicate openly, act urgently, and work collaboratively to rebuild trust through transparency and action.

Sincerely,

Superintendent Brenda Cassellius, EdD

Milwaukee Public Schools

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Executive Summary

With guidance from MHD, MPS has created an immediate lead action plan as the first step to identifying and addressing environmental lead hazards in schools, protecting community health, and restoring community trust. Aside from the appendices, there are two key documents:

- MPS Lead Action Plan: Summary
- MPS Lead Action Plan: Detailed

MPS Lead Action Plan: Summary was created to simplify the detailed plan.

The expectation by all parties is that the MPS Lead Action Plan has living documents. They will be updated and edited as new details to all processes, objectives, timetables, and appendices herein become known or fine-tuned.

Five Core Strategies

1. **Comprehensive School Assessment and Lead-Safe Renovation**
   Every school will undergo a visual assessment followed by full lead risk assessment where hazards are suspected. Results are shared publicly and used to inform cleaning, renovation, and potential temporary relocations. When hazards are identified, MPS implements lead-safe renovation protocols to remove or stabilize deteriorated paint and contaminated dust.
2. **Environmental Health Controls**
   MPS is layering elimination, substitution, engineering, administrative, and personal protective controls to reduce exposure risk to all sources of lead and embed long-term lead-safety practices into facility operations.
3. **Testing and Prevention Efforts**
   MPS is expanding access to blood lead testing for children and developing expanded monitoring protocols for custodial and maintenance staff potentially exposed at work.
4. **Workforce Capacity and Compliance**
   MPS is building a lead-safe workforce by training staff, contracting qualified lead professionals, and seeking funding for dedicated compliance positions to support sustained progress.

5. **Public Communication and Transparency**
   Families are notified at key stages—assessment, remediation, clearance—and will be able to access updates via the MPS website. A prioritization index and school-specific data are updated weekly.

Key Contacts

Timeline and Latest Updates	mpsmke.com/mpsleadreport milwaukee.gov/MPS-Lead
Report Unsafe Work Practices	WI Department of Health Services Lead & Asbestos Program (608) 261-6876 DHSDleadProgram@dhs.wisconsin.gov
Child Health and Blood Lead Testing	Your child's primary care provider OR City of Milwaukee Health Department Home Environmental Health (414) 286-2165
Adult Health and Blood Lead Testing	Your primary care provider OR Wisconsin Poison Center (800) 222-1222
Questions for MPS	lead@milwaukee.k12.wi.us

Comprehensive School Assessment and Lead Safe Renovation

Objective 1.1
Conduct visual lead hazard assessments in 100% of MPS schools built before 1978 serving elementary school students by **September 1, 2025**.

Objective 1.2
Publicly post building-specific remediation statuses and timelines on the MPS website, with weekly updates starting **May 31, 2025**.

MPS is conducting a structured, multistep process to identify and remediate lead paint hazards in all pre-1978 facilities serving elementary school students. The process begins with visual assessments to determine each building's hazard level and inform immediate next steps. Detailed information about closure or timetables for lead-safe remediation are communicated directly to families through school-specific channels.
All assessments and remediation conducted in accordance with Wisconsin DHS Chapter 163 to protect the health and safety of students, staff, and certified workers.

School Prioritization Criteria

Due to the time and resources required to inspect every building, MHD and MPS have implemented a prioritization system to assess facilities based on environmental conditions and student vulnerability.

A school's risk is determined by:

- Building age and pre-1978 construction
- Presence of high-risk student populations (e.g., children under age 6, children with autism or developmental delays, children from low-income households)
- Local data on the prevalence of children with blood lead levels ≥ 15 µg/dL
- Current building condition

The latest prioritization index will be posted on MPS and MHD websites. It will be updated as needed to incorporate new risk information on building conditions or lead poisoning risk.

Steps to Lead-Safe Schools

Step 1: Visual Assessment

A visual assessment is conducted by certified Lead Risk Assessors from MHD, MPS, or a third-party contractor, using the standardized Visual Checklist (Appendix A). This assessment identifies visible lead hazards (such as peeling paint or accumulated dust) and evaluates the risk of exposure based on the location of the hazard and the vulnerability of the children who might come into contact with it.

Findings from the visual assessment are used to classify the severity of hazards and determine appropriate next steps. Schools identified as LOW hazard will be recommended for stabilization and enhanced cleaning. Schools classified as MEDIUM or HIGH hazard might require further assessment, renovation, and — in some cases — partial or full closure to allow remediation to proceed safely.

Temporary School-Building Closure Plan

When lead hazards are identified during inspections, MPS may temporarily close part or all of a school building based on the severity of the hazard. Closures are recommended when hazards are serious enough that remediation work cannot be completed safely and efficiently without exposing students and staff. In all cases, the district aims to address hazards with minimal disruption to teaching and learning. Temporary relocations will be supported with the necessary furniture, materials, technology, and services to continue instruction.

During these transitions, all classroom contents will remain on site in contained areas as a precaution. This approach reduces the risk of spreading lead dust to new locations and ensures that all items can be properly cleaned or managed as part of remediation. Access to contained areas will be limited to certified personnel or contractors performing lead-safe work. MPS students and staff will not be permitted to enter contained areas until MHD has issued clearance.

Full Building Closure

If more than 50% of painted surfaces or greater than 50% of the rooms in a building are deteriorated, the entire school may be temporarily closed. Students and staff will be relocated to an underutilized MPS facility for the duration of the remediation. All instructional supports (including transportation, meals, and specialized services) will be provided at the new site.

Partial Building Closure

If between 10% and 50% of painted surfaces are deteriorated, MPS may close specific rooms, wings, or floors of the building. Students and staff will be moved to unaffected areas within the same building or to a temporary location if needed. MPS will follow all MHD recommendations regarding additional closures and containment protocols.

Step 2: Risk Assessment

Based on the results of the visual assessment, an MHD or third-party certified lead-risk assessor will conduct a full lead-risk assessment. A risk assessment is a more detailed investigation of lead hazards, involving X-ray fluorescence (XRF) analysis and laboratory testing of paint, dust, soil, and water samples. All risk assessments follow the requirements in administrative code DHS 163(14)9.

Step 3: Pre-Work Notifications

Before beginning renovation in any school with students under 6 years of age (or otherwise classified as "child-occupied facility" per DHS 163.03(13)), MPS must notify:

1. **Families.** No more than 60 days before starting work, MPS will notify families of planned renovation activity and where it is taking place. MPS must also provide families with a copy of the federal pamphlet The Lead-Safe Certified Guide to Renovate Right.
2. **State and city health authorities.** At least two working days prior to beginning any renovation work, MPS will notify DHS and MHD by email.

Step 4: Lead-Safe Renovation

Certified lead-safe renovators will remove lead-based paint and other hazards following strict safety procedures to protect students and staff in accordance with DHS orders and DHS 163. Lead-safe work requirements include containing the work area, minimizing dust generation, and HEPA filtration and cleanup.

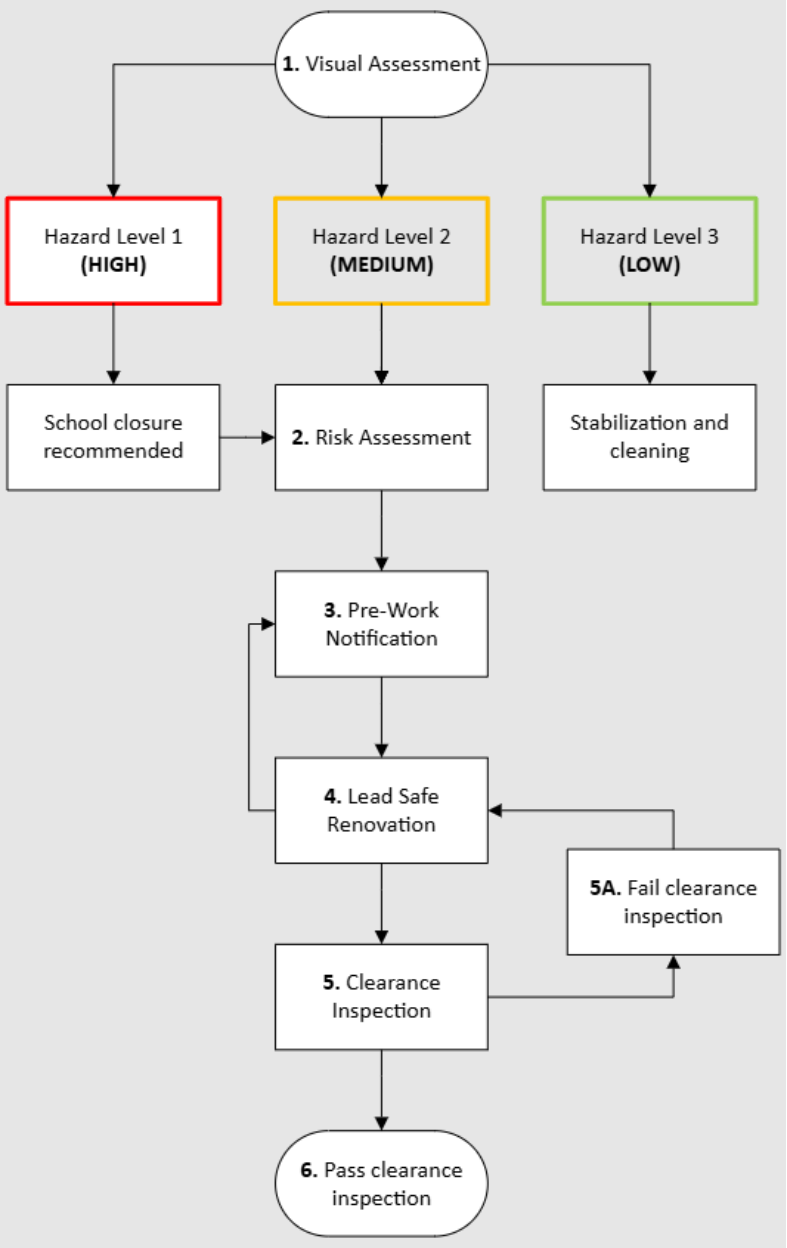
- To report lead-safe work concerns, contact DHS at **(608) 267-9191** or email DHSLeadSafe@dhs.wisconsin.gov

Step 5: Clearance Inspection

After abatement or renovation, a lead-clearance inspection is performed by MHD or a third party following the requirements in state administrative code DHS 163.14(5)(c). A clearance includes dust-wipe sampling and surface testing to ensure lead levels are within safe limits. If the school fails clearance, additional cleaning is required before retesting can occur.

STEP 6: Clearance Achieved

A school is considered lead safe at the time clearance is achieved. MPS will follow actions detailed in the lead action plan to prevent future hazards.


1. Visual Assessment
Hazard Level 1 (HIGH)
Hazard Level 2 (MEDIUM)
Hazard Level 3 (LOW)
School closure recommended
2. Risk Assessment
Stabilization and cleaning
3. Pre-Work Notification
4. Lead Safe Renovation
5A. Fail clearance inspection
5. Clearance Inspection
6. Pass clearance inspection

Environmental Health Controls

Objective 2.1
Implement the most effective engineering or administrative controls in every school with documented hazards by **March 31, 2026, or sooner**.

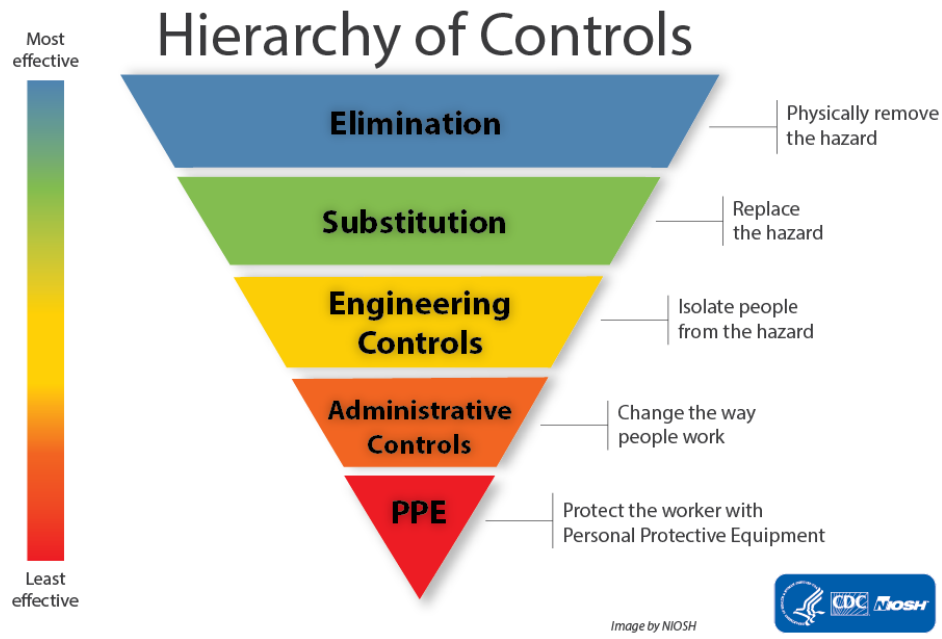
Objective 2.2
Update MPS cleaning and maintenance SOPs to include lead-safe procedures, with district-wide implementation by **October 1, 2025, or sooner**.

Objective 2.3
Evaluate all short-term environmental interventions for long-term sustainability and include successful practices in the Long-Range Facilities Master Plan by **June 30, 2026**.

In consultation with MHD's Home Environmental Health Program, MPS Department of Facilities and Maintenance Services is developing a layered set of environmental health controls to reduce lead exposure in school facilities. Some of these action items have already been implemented, while others are considered based on impact and resources.

Any measure that is implemented in the short term is being evaluated for sustainability and inclusion in MPS's daily operations and long-term planning. This may include integration into the MPS Lead Paint Compliance Program, facility standard operating procedures, MPS staff handbook, and the district's Long-Range Facilities Master Plan.

These structures ensure that environmental health protections are not temporary fixes but lasting safeguards for student and staff well-being.



🔵 Elimination

Physically remove the hazard

- Permanent replacement of lead-painted surfaces (e.g., doors, trim, baseboards)
- Long-term capital planning to divest or fully renovate the most hazardous facilities
- Incorporating lead hazard renovation into Facility Condition Index score for strategic planning
- Full abatement in areas with severe deterioration

🟢 Substitution

Replace the hazard

- Replacing painted wood components with non-leaded, non-painted materials (e.g., rubber baseboards, laminated surfaces)
- Using new furniture and materials that are non-porous and easy to clean
- Removing carpeting and other dust-trapping finishes

🟡 Engineering Controls

Isolate students and staff from the hazard

- Relocating students at higher risk to rooms that are less likely to contain lead hazards, such as those on upper floors or in newer parts of buildings
- Sealing porous flooring such as concrete and tile

- Installing wall corner guards and chair rails to prevent impact damage
- Placing sticky mats at entrances to limit dust tracking
- Laminating windowsills and bookcases to create smooth, cleanable surfaces
- Repositioning student activities (especially floor-based learning) away from high-risk areas such as windows

🟠 Administrative Controls

Change the way people work, play, and learn.

- Developing, documenting, and verifying SOPs for cleaning and maintenance (Appendix F)
- Increasing frequency of EPA-recommended cleaning methods to reduce lead dust
- Creating Building Engineer Checklists to identify deteriorated paint and other hazards
- Updating staff handbook with reporting procedures for deteriorated surfaces
- Decluttering classrooms to improve cleaning effectiveness
- Providing guidance on classroom setup to reduce risk

🔴 Personal Protective Equipment (PPE)

(When applicable) Protect lead-safe renovators and other workers with personal protective equipment.

- Ensure workers follow DHS 163 requirements when conducting lead-safe renovations
- Provide workers with appropriate PPE during renovation activity (gloves, masks, etc).
- Provide HEPA vacuums and other tools needed to follow proper safety protocols

Evaluating Non-Paint Environmental Hazards

Lead is a naturally occurring metal, but the high levels found in our environment today are largely the result of human activity. For decades, lead was widely used in paint, plumbing, gasoline, and industrial products. Although many of these uses have been banned or restricted, lead remains in our environment, especially in older buildings and urban areas.

As a result, lead can still be found in multiple sources, including paint, dust, drinking water, and soil. MPS is assessing school buildings for all of these potential sources of lead exposure. This includes not only evaluating deteriorated paint and dust but also conducting sampling of soil and water, particularly in areas where children are most likely to come into contact with these hazards.

Lead in Water

As part of its standard operating procedures, Milwaukee Public Schools (MPS) maintains its own water filtration plan (see Appendix I: SOP – Drinking Fountains). This includes the use of filtered drinking fountains across the district, with filters replaced at least every 12 months (or sooner, based on usage) to ensure effectiveness and compliance with manufacturer guidance.

In partnership with MHD, water safety continues to be a priority. During lead risk assessments, MHD has conducted water sampling in MPS schools using a two-sample protocol. These results are publicly available on the MHD website for transparency and community awareness.

Significant infrastructure upgrades have been completed:

- By 2016, all lead service lines connecting MPS schools to the city water mains were removed.
- In 2016 and 2017, MPS conducted comprehensive testing of potable water fixtures. Over 94% of fixtures met EPA standards at the time; the remaining 6% were replaced.

MPS will follow MHD's recommendation to follow the Environmental Protection Agency's 3Ts guidance for its school water program, which covers voluntary training, testing, and taking action for safe drinking water. More information on EPA 3Ts is at epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water. MPS will immediately restrict access to any drinking, food preparation, or medical-use water fixtures that test above 10 parts per billion (ppb) for lead.

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.

All fixtures with detectable lead will be evaluated and remediated until the lowest achievable lead levels are confirmed, especially as American Academy of Pediatrics (AAP) recommends that "State and local governments should take steps to ensure that water fountains in schools do not exceed water lead concentrations of 1 ppb." Priority will be given to fixtures serving infants, young children, and pregnant individuals (see Appendix J: Recommendations for Lead in Drinking Water).

Lead in Soil

Soil is evaluated as part of a comprehensive Lead-Risk Assessment. These assessments follow DHS guidelines and are typically conducted in areas where children may come into contact with bare soil, such as playgrounds, courtyards, and unpaved outdoor spaces. If elevated levels of lead are found, appropriate remediation is implemented to reduce the risk of exposure.

Lead in Air?

Current EPA guidance does not recommend lead air sampling as part of standard lead-risk assessments. This reflects a scientific understanding that the primary exposure risk for children comes from ingesting lead-contaminated dust, rather than inhaling airborne lead particles. Air quality science continues to evolve, however; MPS remains open to further guidance from MHD and will continue to collaborate closely to ensure student safety.

Testing and Prevention Efforts

Objective 3.1
Offer blood lead testing at or near all HIGH and MEDIUM hazard schools, with multiple clinics throughout the school district held by **December 31, 2025**.

Objective 3.2
Launch an occupational-health worker testing program by **December 31, 2025.**

Objective 3.3
Share surveillance information by **August 31, 2025.**

Testing is key to early detection and prevention of lead poisoning. MPS is collaborating with healthcare and community partners to expand access to lead testing and support early intervention for children who might be exposed in school settings. MHD and MPS also are sharing data to better understand risk factors and prioritize protective measures where they are needed most.

MHD encourages parents and families to:

- Talk to their child's primary care provider about getting a lead test
- Visit MHD and MPS websites for updates on school-based testing clinics and complete a consent form when applicable
- Learn more about MHD's revised lead testing recommendation schedule

Understanding the Risks of Lead Exposure

Any person who touches a contaminated surface may be at risk for lead exposure. Lead dust can accumulate on common surfaces such as floors, desks, windowsills, and toys, especially in older buildings with deteriorated lead-based paint. When a person touches these surfaces, lead dust can transfer to their hands. If they then touch their mouth, eat, or handle food without washing their hands, they may unintentionally ingest lead. MHD and MPS recognize these risks and are working to ensure protective measures extend to all students.

Some children might face increased susceptibility to lead exposure due to behaviors that increase ingestion of lead-containing materials, or biological factors that increase absorption

once lead enters the body. These risk factors are considered by MPS when implementing hazard controls and offering student testing supports. Parents and guardians are encouraged to speak with their child's primary care provider if they have specific concerns about lead exposure, nutritional deficiencies, or developmental risk factors.

Higher Ingestion Risk

These factors increase the likelihood that a child will ingest lead-contaminated dust, soil, or paint chips:

- **Frequent hand-to-mouth behaviors** such as thumb-sucking, nail-biting, or chewing on toys, pencils, or clothing
- **Pica behaviors,** or eating non-food items such as paint chips, dirt, or paper
- **Diagnosed conditions** that are associated with increased oral behaviors or ingestion risk, including autism spectrum disorder, sickle cell disease, or other developmental or behavioral conditions

Higher Absorption Risk

These factors increase how much lead a child's body might absorb once it has been ingested:

- **Children under age 6** are more likely to absorb lead through the digestive system. Once ingested, lead is more readily taken up into their still-developing brain and nervous system, increasing the risk of long-term harm.
- **Nutritional deficiencies**, particularly low levels of iron or calcium, can increase the amount of lead the body absorbs. When these essential nutrients are lacking, the body might mistakenly absorb lead in their place.

Adult Lead Poisoning

Although children are more biologically vulnerable to the effects of lead poisoning, adults might also be at risk of exposure, especially when working in older buildings where lead-based paint might be disturbed. Custodial staff and school engineers might come into contact with contaminated dust during routine activities such as cleaning, maintenance, or classroom setup.

MPS is developing a worker testing program for affected staff that will meet all applicable requirements set by the Wisconsin Department of Safety and Professional Services (DSPS). This program will help monitor potential adult exposure and ensure timely follow-up and protections

for school employees. For questions about adult lead exposure, MPS employees should contact Concentra.

Workforce Capacity and Compliance

Objective 4.1
Train 100% of custodial and facilities staff on lead-safe cleaning protocols by **October 1, 2025, or sooner**.

Objective 4.2
Secure funding and hire additional full-time lead-risk assessors to oversee district compliance and inspections by **December 31, 2025.**

Objective 4.3
Hire and train additional contracted certified lead-safe renovators and painters or additional MPS staff to increase crew capacity by **December 31, 2025.**

Short-term hazard assessment strategies:

- MHD and MPS conducting visual inspections and clearances
- Contracting out to third-party vendors for lead renovating, moving, and painting services
- Cross certification of MPS environmental inspectors for lead and asbestos

Long-term hazard assessment strategies:

- Seeking funding for lead-risk assessor
- Seeking funding for additional painting and renovating crews

Short-term stabilization and remediation strategies:

- Providing "just in time" cleaning training for staff.

Long-term stabilization and remediation strategies:

- Seeking funding for permanent abatement and divestment solutions

Public Communication and Transparency

Objective 5.1
Provide families with prework notification **within 60 days** of beginning any renovation affecting students under 6.

Objective 5.2
Show school assessment/remediation status, risk level, and clearance updates on the district website by **December 31, 2025**.

Objective 5.3
Host at least one town hall meeting per semester through the **2025–26** school year to address community concerns and showcase remediation progress.

MPS is using a comprehensive, multichannel approach to keep families, staff, and the public informed about lead-related developments.

- **General Updates.** A dedicated webpage launched in February provides up-to-date information on lead findings, remediation efforts, and resources from MPS and the Milwaukee Health Department. It is prominently linked from the MPS home page and updated as new information becomes available.
- **Direct Family Notifications.** MPS and the Milwaukee Health Department collaborate on letters to families and staff in response to key developments such as hazard findings, clearances, school closures, or reopenings.

Moving Forward: What To Expect

1. **School Status and Remediation Progress.** On its website, MPS will provide a full list of all schools actively impacted and identify where schools are in the assessment and remediation process. This list will be updated weekly. See Appendix D in MPS Lead Action Plan.

2. **Increased Prework Notification.** A new protocol for staff and parent notifications of lead- safe work, including the use of the MPS form *Disclosure of Renovation Impacting Lead Based Paint* and the EPA pamphlet *The Lead-Safe Certified Guide to Renovate Right*, is also being integrated into the district's SchoolMessenger system. MPS will document and retain proof of parent notification to comply with state law

3. **Opportunities for Family Engagement.** MPS may host additional town hall meetings for families seeking more information or offer in-person or virtual tours of remediated school buildings to provide visual reassurance.