



## Department of Health

**ANDREW M. CUOMO**  
Governor

**HOWARD A. ZUCKER, M.D., J.D.**  
Commissioner

**LISA J. PINO, M.A., J.D.**  
Executive Deputy Commissioner

September 9, 2020

Re: Lead Testing in School Drinking Water –  
Guidance on flushing prior to reopening

Dear Superintendents and School Representatives:

Thank you for the work you are doing to protect your students, staff, and community in response to the novel coronavirus (COVID-19). We understand that your efforts in response to COVID-19 have and will continue to be priority. With respect to your plans to safely reopen your facilities we offer you the following information regarding building water systems.

### **Guidance for Maintaining Water Quality Prior to Reopening**

Buildings that have been closed or have had limited occupancy for an extended period of time can result in stagnant water conditions to develop within a building's internal plumbing system. This situation is conducive for the growth of bacteria, and can cause leaching of metals, such as lead, from internal plumbing materials, pipes, and water fixtures.

The New York State Department of Health (Department) recommends that schools take proactive steps to address building water quality prior to reopening. As part of the plan for restarting building water systems, schools should be undertaking a flushing program prior to reopening to restore drinking water quality. The United States Environmental Protection Agency (US EPA) has developed water quality reopening recommendations for building owners/managers which can be found on their website at:

<https://www.epa.gov/coronavirus/information-maintaining-or-restoring-water-quality-buildings-low-or-no-use>

*Every building's plumbing system is unique, so it is important to consider the design of your plumbing system when developing your flushing program.*

*As a reminder, schools should not collect samples for lead testing in drinking water (for requirements under Subpart 67-4) following any flushing program.*

### **Lead Testing Deadline**

On April 3, 2020 the NYSDOH issued guidance to all schools required to conduct lead testing in drinking water under Subpart 67-4 to discontinue lead testing of drinking water while a school is closed in response to COVID-19, and that sampling should be conducted upon resuming normal operating conditions. We have received many inquiries from schools and their consultants since then, expressing their concerns about not being able to complete the required monitoring before the end of the compliance period, December 31, 2020. The Department is currently reviewing the regulation to determine if an extension of the compliance period can be granted due to the COVID-19 impact on schools.

If you have any questions, please send an email to:  
[lead.in.school.drinking.water@health.ny.gov](mailto:lead.in.school.drinking.water@health.ny.gov)

Thank you for your efforts during this unprecedented time.

Sincerely,

The Lead Testing in School Drinking Water Program