

# Filter First for Schools Frequently Asked Questions



## General Information

### Who is required to follow the Michigan Filter First laws?

Schools must follow the Clean Drinking Water Access Act (2023 PA 154), and child care centers must follow the amendments to the Child Care Organizations Act (1973 PA 116). Collectively these are known as the Michigan Filter First laws. Filter First applies to all K-12 public and nonpublic schools and licensed child care centers, whether they are on a municipal water supply or are their own Type II noncommunity water supply.

Filter First does not apply to colleges, restaurants, hospitals, or airports. The requirements focus on risk reduction of lead exposure for the most vulnerable population - children.

### Do schools with a child care center located within the school have to include the child care center when complying with the Filter First requirements?

If a child care center is located within a school, it is the responsibility of the school to include all rooms the child care center occupies when complying with the Filter First requirements.

### Is there a summary checklist of the Filter First requirements?

A summary of the requirements is available on [Michigan.gov/FilterFirst](https://Michigan.gov/FilterFirst), included within the Drinking Water Management Plan (DWMP) template and the Filter First guidance document.

### What government agency do I contact for help?

For Filter First guidance as a school, contact the Michigan Department of Environment, Great Lakes, and Energy (EGLE) at [EGLE-DWEHD-FilterFirst@michigan.gov](mailto:EGLE-DWEHD-FilterFirst@michigan.gov). If your school is a regulated Type II (noncommunity) water supply, you will also be working with your local health department to ensure the Safe Drinking Water Act, Lead and Copper Rule requirements are met.

### Will additional Filter First resources be created for schools to utilize?

Additional resources and past webinar recordings for schools will be posted on [Michigan.gov/FilterFirst](https://Michigan.gov/FilterFirst) once available.

## Drinking Water Management Plan (DWMP)

### What is required to be included in the DWMP? Is there a template available?

A DWMP template and additional guidance documents are available at [Michigan.gov/FilterFirst](https://Michigan.gov/FilterFirst). The use of this template is not required, but is available for schools to utilize, and designed to meet all required elements of the DWMP. If a school decides to develop and utilize their own DWMP, or alter the template provided by EGLE, it must include the following required elements:

- The location of each consumptive fixture (a fixture maintained for drinking or food preparation including rinsing vegetables and fruits, preparing drinks or formula, etc.)
- The location of each nonconsumptive fixture (a fixture maintained for purposes other than described above)
- The location where a fixture will be shut off or rendered permanently inoperable
- A schedule for when each of the following will occur:
  - Annual water sampling and testing of the filtered water at each filtered bottle-filling station and filtered faucet
  - Regular replacement of the filter cartridge for each filtered bottle-filling station and filtered faucet in compliance with the manufacturer's instructions or recommendations of EGLE

### For schools that share a building with other non-school organizations, would the DWMP need to include all portions of the building?

The DWMP must include the fixtures in the school area of the building, and other areas in the building that provide drinking water or prepared food to the students. If you have specific questions on the layout of your school, please send an email to [EGLE-DWEHD-FilterFirst@Michigan.gov](mailto:EGLE-DWEHD-FilterFirst@Michigan.gov).

### Do athletic or other activity buildings need to have a DWMP?

Any school buildings that serve drinking water to students need to have a DWMP.

### Where do I submit the DWMP when it is completed?

The DWMP does not have to be submitted to EGLE unless requested. The DWMP must be available to parents and guardians, school staff, members of the public, and EGLE upon request. The DWMP is a tool to assist schools in ensuring that consumptive fixtures are maintained, filter cartridges are regularly replaced, and sampling is completed.

### What additional actions does EGLE recommend for water management in a school building, beyond the Filter First requirements?

As a best water maintenance practice, it is recommended that after an extended period of stagnation schools run fresh water into all consumptive fixtures prior to children returning. This will improve water quality relating to lead exposure risk, bacteriological concerns, and aesthetic issues.

For other recommended best water maintenance practices, visit [Michigan.gov/SchoolWater](https://Michigan.gov/SchoolWater).

## Fixtures and Filters

### How do you know if a filter meets the Filter First requirements?

Every consumptive fixture is required to have a filter meeting NSF/ANSI standard 53 for lead reduction and NSF/ANSI standard 42 for particulate reduction. Information on identifying filters that meet these standards can be found in the guidance document available on [Michigan.gov/FilterFirst](https://Michigan.gov/FilterFirst).

### Will point of entry filters be accepted?

Point of entry filters do not meet the requirements of Filter First. Point of use filtration, meeting NSF/ANSI standard 53 for lead reduction and NSF/ANSI standard 42 for particulate reduction, is required.

Point of entry filtration only filters the water as it enters the school building. Leaded material is found in older building pipes, solder, components, and fixtures. Newer buildings may still contain leaded material in the fixtures (*faucets and fittings manufactured prior to 2014 may contain up to 8% leaded material and newly manufactured faucets can still contain a weighted average of up to 0.25% leaded material<sup>1</sup>*). Point of entry filtration does not protect against the potential lead exposure from these materials.

Prioritizing and requiring point of use filtration enables schools to have the most control and impact in reducing the risk of lead exposure for children.

### Will in-line filters or filters under the sink be accepted?

In-line filter guidance for commercial kitchens, and classrooms or other necessary locations where a filtered bottle filling station cannot be installed is available at [Michigan.gov/FilterFirst](https://Michigan.gov/FilterFirst).

### When deciding if an existing fixture should be designated as a consumptive fixture or a nonconsumptive fixture, what should be considered?

All schools are required at a minimum to have 1 bottle fill station per 100 building occupants. Faucet fixture designation should depend on if it is essential to the function of the room to have a consumptive fixture inside the room (such as a home economics classroom with cooking, a classroom with students unable to navigate to the nearest bottle-filling station independently, or a nurse's station that dispenses medication), these fixtures would be designated as consumptive. Per the Filter First laws, "filtered faucets may be maintained only when the installation of a filtered bottle-filling station is not feasible but a water outlet for human consumption is necessary."

If it is not essential for the function of the room to have a consumptive fixture inside the room (such as an art room for preparing supplies, a science laboratory for doing experiments, or a classroom that needs access to handwashing only), the fixture should be designated as a nonconsumptive fixture and have signage posted indicating as such.

Additionally, when deciding which consumptive fixtures to maintain, consider the costs of installation and providing long term maintenance and filter cartridge replacement.

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<sup>1</sup>[How to Identify Lead Free Certification Marks for Drinking Water System & Plumbing Products | US EPA](https://www.epa.gov/lead/lead-free-certification)

### **Is signage required for consumptive and non-consumptive fixtures?**

Signs are required for all fixtures, clearly indicating whether the fixture is intended to be used for consumption or not.

### **Is the one filtered bottle-filling station for every 100 occupants based on student count or a different count?**

The one filtered bottle-filling station for every 100 occupants requirement is based on student and staff count, excluding visitors or individuals attending special events.

### **What filtered consumptive fixtures are required to have indicator lights?**

Filtered bottle-filling stations are required to have an indicator light or other device to indicate filter replacement status. Filtered faucets are not required to have an indicator light or other device to indicate filter replacement status, however it is recommended by EGLE. All consumptive fixtures must be included in the DWMP with schedules to ensure regular replacement of the filter cartridges per manufacturer instructions.

### **How can kitchen and food preparation devices (pot fillers, hot water dispensers, etc.) be retrofitted to meet the Filter First requirements?**

Guidance on retrofitting kitchen and food preparation devices to meet the Filter First requirements is available on [Michigan.gov/FilterFirst](https://Michigan.gov/FilterFirst).

### **Are filters required on kitchen sinks used for handwashing or ware-washing only?**

Kitchen sinks utilized only for handwashing or ware-washing and not intended for human consumption do not require filters to be installed. These locations must have signage that the fixture is a non-consumptive fixture and be identified in the DWMP.

## **Sampling**

### **What are the sampling requirements?**

Filter First requires that each filtered water fixture be sampled annually through the filter. EGLE recommends initial sampling when filters are installed. Samples must be collected in 250 mL bottles after at least an 8-hour stagnation period and analyzed for lead at a certified laboratory.

### **Who can take the samples?**

Anyone can collect the samples, if they understand the requirements for sampling.

### **Is there a maximum stagnation time prior to sampling?**

There is no maximum stagnation time, only a minimum stagnation time of 8 hours prior to samples being collected. The intent of at least 8 hours of stagnation is to replicate the normal stagnation period overnight before the usage of a consumptive fixture the next school day.

## **Will Type II noncommunity water suppliers be able to use the Filter First sampling to meet their Lead and Copper sampling requirements?**

Samples collected for the Safe Drinking Water Act Lead and Copper requirements have different sampling method requirements than Filter First samples and cannot be used interchangeably. The Safe Drinking Water Act's Lead and Copper Rule requires a 1-liter bottle and at least a 6-hour stagnation period, while Filter First requires a 250-mL bottle and an 8-hour stagnation period.

## **Does a school that recently completed sampling still need to follow the Filter First requirements?**

All schools must follow the Filter First requirements, regardless of previous sampling. Sampling results are only a snapshot in time and only represents the risk for exposure at that moment. The Filter First requirements are intended to reduce the risk of exposure to lead in drinking water by filtering all consumptive fixtures, and the required sampling helps to ensure the effectiveness of the filters.

## **What happens if sampling through filtered fixtures results in elevated lead concentrations?**

Filter First requires follow-up steps to be taken in response to a water sample from a filtered fixture having detections of lead. These actions are detailed in the Filter First guidance documents available at [Michigan.gov/FilterFirst](https://Michigan.gov/FilterFirst), and within the Filter First laws. If you have specific questions on sample results, please send an email to [EGLE-DWEHD-FilterFirst@Michigan.gov](mailto:EGLE-DWEHD-FilterFirst@Michigan.gov).

## **Is there a list of certified laboratories for testing lead in drinking water?**

A list of certified lead and copper laboratories can be found here: [michigan.gov/egle/about/organization/remediation-and-redevelopment/laboratory/certifications](https://michigan.gov/egle/about/organization/remediation-and-redevelopment/laboratory/certifications).

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