System Name Community Engagement Plan for Drinking Water Service Line Inventory

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The Community Engagement Plan (CEP) is an internal working document used by the Project Core Team to guide public outreach and communications for service line inventory and/or lead service line replacement (LSLR planning and capacity development activities) (hereafter referred to as “the Project”). It provides a framework for how the public and stakeholders are engaged so the System Name satisfies the requirements of the [Lead and Copper Rule Revisions (LCRR)](https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule)[[1]](#footnote-2).

The estimated Project timeline is Month X, 202X to Month X, 202X. The CEP will guide public outreach communications and engagement over the life of the Project and should be updated periodically to reflect new outreach initiatives or information. The CEP is a living document that can be tailored over time to reflect unique community engagement needs and preferences. Community engagement strategies can be added and/or removed at any time.

# Project Core Team

The Project Core Team includes representatives of the System Name, System Name consultants and/or System Name Municipal Partners (e.g., Municipality Planning Department). A system may want to elect a primary point of contact or lead person for the community engagement projects.

*Project Core Team Members*

|  |  |  |
| --- | --- | --- |
| Name | Agency/Organization | Email |
| *Name A* | System Name |  |
| *Name B* | System Name |  |
|  | System Name Consultant |  |
|  | Municipal Partner |  |

# Community Engagement Goals

Articulating community engagement goals is helpful to identifying the most appropriate communication method for each goal. System’s Name’s community engagement goals for the Project are as follows:

**Note**: The below community engagement goals are intended as examples. These goals should be edited to reflect the unique needs of customers in your service area.

1. Customers will be aware of the Project which includes the reasons for the LSLI and LSLRs and know where and who they can contact to obtain additional information and resources.
2. Customers will understand the importance of identifying LSLs and the benefits of LSLR to public health.
3. Customers will be knowledgeable of upcoming Project events (e.g., public meetings) and initiatives that are likely to affect them (e.g., door-to-door verification, potholing).
4. Customers will understand the importance of participating in LSL inventory data collection on the private service line side. Customers will understand how to conduct independent LSL verification tests and report that information back to the System Name.
5. Customers will be knowledgeable of available options for financing LSLR (including whether System Name will cover costs). Customers will also understand that System Name is required to report and publicly make available information about lead, galvanized requiring replacement, and lead status unknown service lines.
6. Customers understand that supporting LSL identification efforts will likely reduce the number of service lines identified as “unknown” and therefore reduce potential future impacts (e.g. designation assigned to their property value during future real estate transactions).
7. Customers will be knowledgeable about risk mitigation measures related to reducing their household’s exposure to lead in drinking water.
8. Customers will understand why risk mitigation measures are important to protect public health as well as how and when to follow them based on their individual circumstances (i.e., after an LSL has been identified, after a LSLR).
9. Customers will form a broader long-term relationship with the System Name for ongoing water infrastructure efforts.

# Public Education Topics & Messaging

It should be expected that customers will have varying levels of familiarity with the System Name’s activities in general and related to the LCRR requirements, as well as varying levels of understanding on why activities are necessary or important to safeguarding public health. Other communities engaging in service line inventory and replacement activities frequently communicate about public education topics, including the following:

* Sources of lead in drinking water
* Health impacts of lead in drinking water
* Exposure to lead by sensitive populations (e.g., pregnant women, children)
* Health impacts of lead via other sources (including whether showering/bathing is safe)
* Typical service line ownership (including visuals of service lines and water meters)
* How to reduce exposure to lead in drinking water by implementing risk mitigation measures

Based on the System Name’s current efforts to-date, customers are likely to raise the following questions and concerns:

**Note**: The below public education topics are intended as examples. The list of questions/concerns and *key messages (italicized)* should be further tailored to reflect the needs of the customers in your service area.

* Customers may be unresponsive or unwilling to engage (e.g., not wanting water system to conduct a visual inspection inside the house, not wanting physical verification). Customers may want to know how service line inventory and replacement activities affect them personally, and why they should participate in identification efforts.
  + *Project Core Team members should emphasize the above public education topics (e.g., health impacts of lead in drinking water), clearly identify the System Name’s responsibilities under the LCRR, and note options—as applicable—for service line material verification that may be acceptable to the customer. If applicable, Project Core Team members may also find it helpful to talk about funding assistance programs that may be available for customer side lead service line replacements. In addition, Project Core Team members may want to explain to customers that the service line inventory will help System Name better understand its water system and infrastructure, as well as to better identify potential sources of lead in drinking water.*
* Customers will likely want to know how much it costs to replace their service line, and what funding assistance programs are available to them

*Project Core Team members may be able to provide initial estimates of how much the typical service line replacement costs within the System Name’s service area. As available and applicable, Project Core Team members can also provide information on funding assistance programs, including eligibility, funding types, and funding amounts.*

* Question/Concern
  + *Key message that the Project Core Team members can use to respond to this question/concern.*

Additional example questions/concerns may be:

Customers may want to understand how the costs of Project activities could potentially be reflected in future water rate changes

# Summary of Existing Communication Methods

The Project Core Team should capitalize on existing communication methods to provide information, as customers can be expected to have some level of familiarity with these methods. Utilizing existing communication methods may also require less investment in staff, time, and other resources as the System Name can rely on established procedures and customer contact lists.

System Name already uses several methods to communicate with its customers. Those that will likely be most useful for the Project are identified below.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Communication Method | Current Frequency | Proposed Timing for LSL Messaging | Contact | Notes |
| Onsite appointments | Ongoing | TBD | Staff name | E.g., Staff communicate with customers during onsite appointments |
| Utility newsletter | Quarterly | TBD | Staff name | E.g., Information must be submitted 2 weeks in advance |
| Bill flyers or inserts | Monthly/Quarterly | TBD | Staff name |  |
| Utility website | Ongoing | TBD | Staff name |  |
| Hosting Community Events | Occasionally | TBD | Staff name |  |
| Consumer Confidence Report (CCR) | Annual | TBD | Staff name |  |
| Phone Alert System | As needed | TBD | Staff name |  |
| Customer e-list | As needed | TBD | Staff name |  |
| Door hangers/  Postcards | As needed | TBD | Staff name |  |
| XYZ Newspaper | As needed | TBD | Staff name |  |
| Local Radio Station | As needed | TBD | Staff name |  |
| Social media – specify | X times/year | TBD | Staff name |  |

## Project Website/Webpage

**Note:** Online educational and promotional materials shared by System Name will likely change to best meet community engagement objectives over the course of the Project. The ideas in this section are a potential starting point to identify how to best share information with customers via System Name’s website.

The Project website/webpage will be hosted on the System Name’s existing webpage. Every outreach material developed should include the Project website/webpage and/or QR code and direct people to the site for more information.

Example content for the Project website/webpage could include:

* The primary point of contact for the Project should be clearly listed on the website/webpage, and customers should be able to easily understand how to contact the System Name with additional questions or concerns.
* Background information on LSLR and the health impacts of lead and sources of lead in drinking water
* A public-friendly summary of the LCRR requirements (i.e., develop an LSL inventory by October 16, 2024), and information on what the System Name is doing to meet the LCRR requirements.
* Details about upcoming public events
* A public friendly overview of service line ownership and what lead service lines look like
* Updates on the System’s progress of the service line inventory and other LCRR requirements, including field verification efforts and risk mitigation measures.
* Instructions describing how to accurately self-identify the service line material entering the home

Additionally, the Project website/webpage could allow visitors to sign-up for any e-lists associated with the Project. The Project website/webpage could even include interactive features, such as virtual schedulers where customers can schedule service line material identification site visits by System Name staff (if staffing allows) and/or a link for customers to upload information about and photograph(s) of their service line.

**Project website/webpage**: [Insert hyperlink here]

## Other Relevant Communication Methods

The System Name also [Insert discussion of other communication methods relevant to the System Name].

# Best Practices

The primary purpose of community engagement is to ensure that all customers in the community are well-informed, their concerns are appropriately addressed, and the service line inventory is successfully submitted to the Pennsylvania Department of Environmental Protection (DEP) by October 16, 2024. Additionally, community engagement should enable future LSLR and advance public health, while increasing buy-in and information from customers.

## Vulnerable and Underrepresented Populations

The community engagement process must take special care to engage vulnerable and underrepresented populations in order to ensure they are aware of how the Project may affect them and safeguard public health.

For the purposes of PA DEP’s Environmental Justice (EJ) Policy, census block groups with a PennEnviroScreen score above 80 will be considered EJ areas for consideration as Public Participation Trigger Projects. This highlights those parts of the commonwealth facing the most disproportionate environmental impact across multiple factors.[[2]](#footnote-3) System Name does/does not have any EJ Areas in its service area, listed below:

* List EJ Area, if applicable
* List EJ Area, if applicable

There may also be other vulnerable, underrepresented, and/or underserved populations not identified by PA DEP’s definition. This could be based on staff experience connecting with different populations and areas within its service area and/or federal data. The System Name is aware of the following other populations:

* List other population of concern, if applicable
* List other population of concern, if applicable

**Note**: If needed, check <https://screeningtool.geoplatform.gov/en/>, <https://www.epa.gov/ejscreen>, other sources, and/or local knowledge to supplement.

A list of contacts and leads related to vulnerable populations in the community will be compiled and added to the notification process discussed below, as well as opportunities for interviews and small group meetings. These could include, but would not be limited to:

* Residents in subsidized housing, transient housing, or senior housing developments.
* Contacts or touch points for non-profit social services (e.g., volunteer food service).
* Contacts or touch points for government social services (e.g., bill payment assistance, people with disabilities).
* Community based organizations (e.g., faith-based groups, neighborhood groups).

Once contacts and leads are identified, Project Core Team members will reach out with persistence and respect, working with these groups to meet them on their terms and in the manner with which they are most comfortable. This may require additional accommodations (some noted below) or meetings.

*Specific Group/Organizations that should be targeted*

|  |  |  |  |
| --- | --- | --- | --- |
| Organization | Location | Contact | Primary issues(s) of concern |
| TBD | TBD | TBD | TBD |
| TBD | TBD | TBD | TBD |

## Timing

The Project Core Team should explore the benefits of holding in-person events at different hours of the day and different days of the week, including weekends, to increase participation. Planning should also take into consideration religious, cultural, or civic events that may affect attendance. Where appropriate to do so, based on the System’s Name knowledge of their community, attempts should be made to deliver key messaging in a respectful manner at specific community events.

## Childcare, Food, and Transportation

Depending on timing, the needs of participants during an in-person event can also present a barrier. The Project Core Team will need to consider support for participation, including childcare, food, and transportation to the event, if needed.

## Event Locations

In-person events should take place in venues where participants feel welcome, considering religious spaces, schools, local organizations (e.g., Rotary Club, Lions Club), and cultural centers. Spaces should be accessible for people with disabilities and accommodate additional space for childcare or other special needs, as needed. Wherever possible, spaces should also be known to community members and easily reachable.

*Venues*

|  |  |  |  |
| --- | --- | --- | --- |
| Location | Venue | Contact | Type of space available |
| TBD | TBD | TBD | TBD |
| TBD | TBD | TBD | TBD |

## Technology Considerations

It is important to recognize that there are members of the community that have limited access to and have difficulty with online access. Both high- and low-tech alternatives should always be part of the community engagement process.

## Translations and Interpreters

At this time, the Project Core Team has noted that language translation and interpretation services are needed to help facilitate effective community outreach and engagement. All printed materials will be translated into X language(s). The need for interpreters will be gauged based on the meeting location and audience.

*Contacts for Translations and Interpreters*

|  |  |  |
| --- | --- | --- |
| Service | Organization/Agency | Contract |
| X language translations | TBD | TBD |
|  |  |  |

## Accessibility

Additional steps should ensure that engagement activities are accessible. This includes physical space for people with disabilities and services to assist people with hearing or sight impairments. These services can be made available upon request by the public.

**Note:** Commonly requested services are listed below. Typically, advertisements for more formal engagement events such as public meetings should include instructions on how to request services in advance of the meeting by a certain date so adequate accommodation can be provided.

*Other Services Needed to Accommodate People with Disabilities*

|  |  |  |  |
| --- | --- | --- | --- |
| Service | Organization/Agency | Location | Contract |
| Sign Language Interpreters | TBD | TBD | TBD |
| Audio/closed captioning | TBD | TBD | TBD |
|  |  |  |  |

## Virtual Options and COVID-19 Considerations

While the Project Core Team is moving forward with the assumption that there will be some in-person engagement, the Project Core Team should be prepared to use virtual options as needed. Therefore, every in-person event should have a virtual equivalent or virtual follow-on component. For example, all presentations and materials will be posted online.

# Promotional and Outreach Materials

Promotional and outreach materials will be created as needed, based on the Project Core Team’s capacity. Example materials include postcards, door hangers, flyers, and business cards. The Project Core Team can provide draft informational and outreach text or review draft materials. It is understood that all materials will need to be reviewed by the System Name before they are distributed publicly. Therefore, it is the goal of Project Core Team to develop promotional and outreach materials at least X weeks before they are needed. Unforeseen opportunities or schedule constraints may reduce that lead time and the Project Core Team will do everything possible to limit faster turnaround times.

The need for language translations will factor into the development of materials. It is anticipated that materials that will be printed will be translated into [insert language(s) here].

In all materials, System Name’s website (and preferably the specific webpage hosting lead-related information) should be prominent to direct people to more information. QR codes can be used for quick access.

Overall, the Project Core Team should be mindful of proper messaging about topics associated with the Project, both in discussions and on print and online materials. Technical terms and jargon should be avoided, ensuring that information and data are presented to the public in a way that is easy to understand.

# Community Engagement Strategies

The following provides an overview of the types of strategies that can be used to engage water system customers throughout the community.

## Media Outreach

The Project Core Team will coordinate media outreach. This includes traditional media and social media, as applicable. Media outlets can be used for public education purposes or to advertise upcoming Project events. All proposed communications will go through [insert Core Team member] who will decide what needs to be vetted by whom. The Project Core Team will coordinate with any local media outlets for specific requirements, such as formatting and timing of messaging.

Name of Media Coordinator

Phone

Email

*Potential Media Outlets to Engage*

|  |  |  |
| --- | --- | --- |
| Media Outlet | Contact | Notes |
| Local newspaper name | Staff name | E.g., Information must be submitted X weeks in advance; format must be XYZ. |
| Social Media – specify platform | Staff name | E.g. Providing customers with an account status notification of sections of the distribution system when and where they are conducting inventory work |
| Local Radio Station | Staff name |  |

## E-Blast Campaign

A master list of email contacts will be developed using the following sources:

* Existing contact lists of customers
* Contacts from local groups, particularly those representing vulnerable and underrepresented populations
* Sign-up sheets at public events
* Utility website

The Project Core Team will maintain the email database throughout the Project and send out notifications related to upcoming events and other important Project developments. [Insert name of primary responsible individual(s) here] will be responsible for maintaining the email database.

## Piggybacking on Existing Community Events & Meetings

Existing events provide great opportunities to set up an information booth or hand out flyers/information. Depending on the event, this type of community engagement could be staffed or be designed to function without staff.

Likewise, existing meetings held by community organizations are great to piggyback on to reach a wider community audience and gain informal “endorsements” by influential organizations. The Project Core Team should review opportunities to do brief informational presentations and question and answer sessions at these meetings.

*Upcoming Events/Meetings*

| Event | Date | Contact | Core Team Member Responsible for Coordination |
| --- | --- | --- | --- |
| Ex/ Home Builder Shows | TBD | TBD | TBD |
|  |  |  |  |
|  |  |  |  |

## Intra-Municipal Engagement

Municipal boards, commissions, departments, and government should be engaged throughout the Project. Intra-municipal engagement can help the Project Core Team reach a wider audience, add additional legitimacy to the Project, and build support for any future investments needed for LSLR activities. Intra-municipal engagement activities and “asks” may include the following:

* Intra-municipal emails/alerts to keep staff and board/commission members informed of the Project.
* Project Core Team members (or other System Name staff) attend scheduled municipal board/commission meetings to provide information.
* Project Core Team requests a municipal board/commission distribute community engagement materials through their e-lists, social media, or at their events.
* Municipal government issues regular press releases about the Project.

*Municipal Bodies to Engage*

| Municipal Body | Contact | Type of Engagement/Ask | Core Team Member Responsible for Coordination |
| --- | --- | --- | --- |
| TBD | TBD | TBD | TBD |
| TBD | TBD | TBD | TBD |
| TBD | TBD | TBD | TBD |

## In-Person Public Events

In-person events for the purpose of this CEP refer to public events such as informational public meetings. It is assumed that these events would be between one to two hours and could occur at varying times of day. Project Core Team members will be responsible for securing in-person event locations in the community. This includes coordinating meeting space needs, such as projector and screen, tables and chairs, and other on-site logistics. Project Core Team members would develop meeting materials, including presentations, handouts, and posters as needed.

Given the public education intent of community engagement, it may be appropriate to invite representatives from DEP or EPA to be present at in-person public events to answer questions or present informational materials.

## Virtual Public Events

As noted earlier, every in-person event should have a corresponding virtual component to ensure information is still available to those unable to attend in-person. For example, this may include a hybrid meeting, where a presentation is streamed live. It is anticipated that virtual public events could be scheduled using the System Name’s virtual meeting accounts.

Given the public education intent of community engagement, it may be appropriate to invite representatives from PA DEP or EPA to be present at virtual public events to answer questions or present informational materials.

## Pop-Up Installations

Setting up pop-up installations (sometimes with staff, sometimes without) in strategic areas is an efficient way to maintain or raise awareness and capture feedback in very short contact periods. This technique may include an informational poster which provides background information related to the LSL project or digital signs outside establishments and directs the public to additional resources (e.g., using a QR code to direct individuals to online resources). Grocery stores, community centers, police/fire stations, parks, farmers markets, and other high traffic areas are all good candidates for pop-up installations.

*Listening/Pop Up Stations*

| Location | Date of Set Up | Staffing |
| --- | --- | --- |
| TBD | TBD | TBD |
|  |  |  |

# LCRR Communication Requirements

The LCRR communication requirements are summarized on pages 26-35 of the American Water Works Association’s *[Lead Communications Guide and Toolkit](https://www.awwa.org/Portals/0/AWWA/Communications/2022LeadPageAssets/2022AWWA-LeadCommunicationsGuideAndToolkit.pdf)* [(2022)](https://www.awwa.org/Portals/0/AWWA/Communications/2022LeadPageAssets/2022AWWA-LeadCommunicationsGuideAndToolkit.pdf) [[3]](#footnote-4)3. Project Core Team members should review this list and identify which requirements they anticipate needing the most support to fulfill:

**Note**: A review of the Lead Communications Guide and Toolkit (2022), or other similar reference, is recommended so the Project Core Team to identify which requirements they anticipate needing the most support to fulfill. The community engagement plan can begin to identify strategies to meet these needs.

## Lead Service Line Inventories

* The service line inventory must be publicly accessible, and if the water system serves more than 50,000 people, the inventory must be provided online. System Name will make its inventory publicly accessible by XYZ. Given that System Name services X people, the online requirement is/is not applicable. System Name will provide the inventory at the following link: [insert hyperlink here]
* Other requirements likely need special attention, if applicable.

## Annual Lead Service Line Notification Requirements

* Requirement likely needing special attention, if applicable.

## Lead Service Line Replacement Plan

* Requirement likely needing special attention, if applicable.

## Risk Mitigation Measures

* Requirement likely needing special attention, if applicable.

## Tap Sampling

* Requirement likely needing special attention, if applicable.

## Action Level Exceedance

* Requirement likely needing special attention, if applicable.

## When a Disturbance Happens

* Requirement likely needing special attention, if applicable.

## Public Education Health Effects Language

Note that the following language must be included in Consumer Confidence Reports, public notices, and public education materials:

*“Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.”*

**Note:** The U.S. EPA’s regulation at [40 CFR 141.85](https://www.ecfr.gov/current/title-40/section-141.85) provides information about the content of written public education materials. The public education health effects mandatory language may be changed only with State approval. The section titled “Know the Health Effects” in System Name’s 2022 Consumer Confidence Report could be evaluated to determine which additional communication requirements at [40 CFR 141.85](https://www.ecfr.gov/current/title-40/section-141.85) the existing language satisfies.

## Outreach to State and Local Health Agencies

* Requirement likely needing special attention, if applicable.

## Updated Information in Consumer Confidence Reports

* Requirement likely needing special attention, if applicable.

## Testing at Schools and Child Care Facilities

* Requirement likely needing special attention, if applicable.

1. <https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule> [↑](#footnote-ref-2)
2. [PennEnviroScreen (pa.gov)](https://gis.dep.pa.gov/PennEnviroScreen/) [↑](#footnote-ref-3)
3. 3 American Water Works Association, *Lead Communications Guide and Toolkit*, 2022, <https://www.awwa.org/Portals/0/AWWA/Communications/2022LeadPageAssets/2022AWWA-LeadCommunicationsGuideAndToolkit.pdf>. [↑](#footnote-ref-4)