



Coalition on Lead Emergency

1720 W. Locust, Milwaukee, WI 53206

Coalitiononleademergency.org

To: Mayor Barrett and Members of the Milwaukee Common Council

From: The Coalition on Lead Emergency

Re: American Rescue Plan Act Funds to Reduce Childhood Lead Poisoning

Date: June 30, 2021

COLE Contacts:

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Executive Summary

The COVID pandemic has increased lead poisoning risks for the children of Milwaukee and magnified racial inequities. Due to school closings and restrictions on gatherings outside of their homes, thousands of low-income BIPOC children have been confined to older, neglected housing units with high risks of lead exposure through paint, lead service lines, and contaminated soil.

The pandemic has greatly reduced the number of children being tested for lead poisoning. The pandemic blocked the implementation of the Coalition on Lead Emergency's (COLE's) Birthing Moms Pilot Project, as WIC clinics were closed and home visits to birthing moms were suspended. COLE's proposed reduction of the actionable level for lead home investigations and any subsequent lead abatement orders from 20 mcg/dL down to 5 mcg/dL of lead in blood has been stalled even though it was strongly supported by the Common Council and the Mayor in the 2021 City Budget.

The American Rescue Plan Act (ARPA) funding offers a singular opportunity to continue the course towards a Lead Safe Milwaukee – a course which has been seriously impeded by the COVID pandemic.

COLE requests that the City of Milwaukee direct \$97,724,000 from ARPA allocations to the Milwaukee Health Department and community-based organizations to:

- 1. Accelerate lead abatement and train needed lead abatement workers (\$83,000,000)**

- Perform lead abatement and necessary repairs in 2,000 housing units
- Fund relocation services to protect families during lead abatement projects
- Train and certify lead abatement workers and supervisors
- Conduct lead home investigations and issue any subsequent lead abatement orders for the homes of all lead-poisoned children

2. Advance lead education, outreach, and blood lead testing (\$14,724,000)

- Train and staff more community lead outreach workers
- Distribute Healthy Home Kits to reduce lead hazards, including lead-safe water filtration to protect against lead exposure from contaminated drinking water
- Hire additional nurses to perform blood-lead tests in public schools
- Create a staff a “lead hotline: information worker
- Create a lead awareness campaign, including a single contact number for lead-poisoning related questions and resources

3. Train the workforce needed to accelerate lead service line replacement (\$ TBD)

- Fund workforce training and job placement for workers needed to perform lead service line replacements
- We do not provide a numeric proposal for ARPA funds for this part of our proposal. Rather, we provide a discussion of the issue and encourage the Mayor, City Council, and Milwaukee Water Works to work with the Water Equity Task Force and with COLE’s Workforce Development Committee to ensure that the City can implement any federal infrastructure spending bill. We also urge the City to commit to replacing lead service lines on an accelerated time schedule so that the work is complete by 2031

A full explanation of our three-part proposal follows this summary. All funds are proposed to be spent between 2021-24. A table is provided at the end with a summary of the costs proposed for each of the items and the number of jobs that will be created as part of this proposal.

We welcome further conversation about our proposal and look forward to the opportunity to discuss how the City can make this the last decade when lead poisoning plagues the City. For further discussion, please contact Richard Diaz and Rev. Dennis Jacobsen, Chair of COLE and Chair of the COLE Advocacy Committee, respectively. We appreciate your consideration of our proposal.

COLE'S PROPOSAL FOR MILWAUKEE'S ARPA FUNDS

Introduction

The COVID pandemic directly increased the risk of lead poisoning for Milwaukee families. These same families were also more likely to suffer more severe impacts from COVID itself, due to underlying health disparities and other social vulnerabilities suffered by low-income and underserved communities. Federal guidance on the use of ARPA funds prioritizes the use of funds to address pre-existing health disparities and other social vulnerabilities that drive these disparate outcomes. **Efforts to reduce lead hazards to reduce the risk of elevated blood lead levels among children was specifically cited in the guidance as an example of the underlying vulnerabilities that should be prioritized.**

Federal guidance also prioritizes using ARPA funds for workforce development and training programs targeted at low-income communities to address the economic challenges of communities disproportionately impacted by the pandemic, in recognition of pre-existing systemic economic disparities that led to these communities suffering more severely from COVID, as well as the further economic impacts suffered by these communities as a result of the pandemic. COLE's proposal includes funding for good paying jobs targeted to residents from communities hit hardest by the health and economic impacts of the pandemic. In addition to providing paid training for these workers leading directly to job opportunities, COLE's recommendations for ARPA funding would sustain these jobs for the remaining years during which ARPA funds can be expended and launch them into careers. Allocating ARPA funds to support these jobs would not require the City to expand its payroll, because most of the jobs proposed would be placed with community-based organizations or local firms.

COLE's recommendations respond to the above-mentioned factors for determining how ARPA funds should be prioritized. The recommended measures would:

- Mitigate low-income communities' risk of lead poisoning, a risk that was greatly exacerbated during the pandemic;
- Address underlying health disparities and other social vulnerabilities that caused low-income families in Milwaukee to suffer disproportionately from the pandemic; and
- Address systemic economic challenges which increased low-income and underserved communities' vulnerability to the virus and were exacerbated by the pandemic.

COLE Three-Part Proposal for ARPA Funds to Reduce Childhood Lead Poisoning

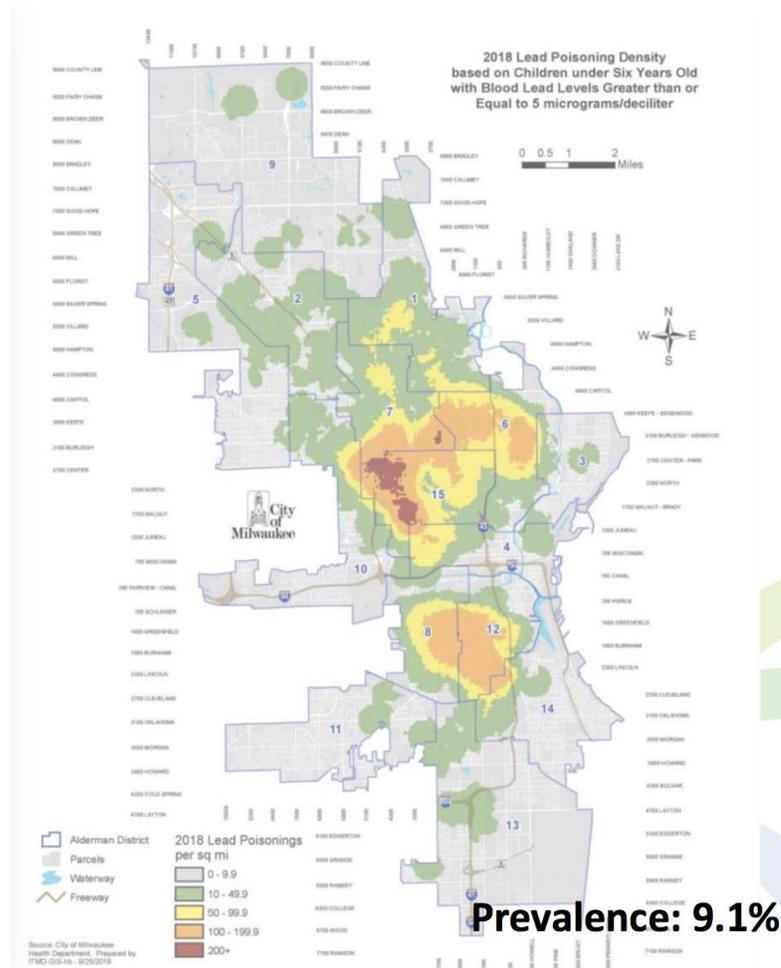
- 1. Accelerate lead abatement by reducing lead hazards in 2,000 housing units and ensure that the City responds to the home of every lead-poisoned child with a lead assessment and case management services (\$83,000,000).**
- **\$55,000,000.** The City of Milwaukee Health Department (MHD), in collaboration with community-based organizations, requests additional funds to conduct lead abatement and other property repairs to ensure the safe condition of homes in our community. Funds will contribute to the goal of addressing 2,000 housing units constructed before 1978 in neighborhoods where there are high concentrations of lead-poisoned children. The average cost per unit for lead abatement is \$25,000. In addition, many properties need extensive property maintenance repairs. These repairs include roofing, electrical hazards, plumbing repairs, gas leaks, and similar critical housing issues. Without these critical repairs, homes that would otherwise be eligible for lead abatement are deferred from receiving services from the program. COLE therefore recommends a \$5 million Deferral Repair Fund for low-income homeowners to make these requisite repairs. Increasing the scale of lead abatement work being done in Milwaukee will effectively reduce the per-unit costs, particularly for inspection and administration. Moreover, taking steps to coordinate the work of the separate lead abatement and weatherization programs, which are often needed in the same house, will reduce duplicative efforts, eliminate gaps in services, and further reduce per unit costs. To encourage this coordination, we suggest that MHD and community-based organizations take steps to ensure that families in homes subject to abatement orders are educated about Weatherization Assistance services and pre-qualify them for Weatherization Assistance. Ensuring a home is fully weatherized is often another necessary service before a home is habitable, safe, and energy efficient. Homes subject to lead-abatement orders are often not healthy during Wisconsin's cold winter months without weatherization interventions. **The cost for lead abatement and a \$5 million Deferral Repair Fund for low-income households to make necessary lead-related property repairs is approximately \$55 million for 2,000 units.**
 - **\$6,000,000. Relocation and temporary housing for families during lead abatement of those 2,000 units will cost approximately \$6 million.**
 - **\$5,000,000.** To guarantee the workforce necessary to conduct lead abatement, community-based organizations should be awarded grant funding to recruit, train, certify, and place 200 lead abatement workers and 50 lead abatement supervisors from highly impacted neighborhoods to work in new teams with local contractors. Measures should be taken to ensure that the jobs filled by these workers are good-paying, family-supporting jobs. Specialty training would be provided in such skills as carpentry, aluminum wrapping, window installation, and safe lead remediation. Essential equipment would be purchased for each

worker. This significant development of a skilled workforce from low-income neighborhoods is essential for lead abating 2,000 housing units while providing jobs and income for currently unemployed or underemployed residents. **The total cost for recruiting, training, certifying, and placing 250 workers with local contractors, and providing essential equipment, is approximately \$5 million.**

- **\$17,000,000.** In 2020, COLE urged the Milwaukee Common Council to direct funds to the MHD to reduce the actionable blood lead level for home lead investigations from 20 mcg/dL to 5 mcg/dL. This request was strongly supported by the Common Council and the Mayor in the 2021 City Budget. As the City is well aware, if the intervention level remains at 20 mcg/dL, approximately 1800 lead-poisoned Milwaukee children per year will not receive the necessary help. Additional funding is needed to develop and implement the staffing and systems to enable MHD to respond to cases identified at a lowered action level of 5mcg/dL. In addition, while the cost of risk assessments and case management are reimbursed for children on Medicaid, not all lead-poisoned children in Milwaukee qualify for Medicaid and funding is needed to cover these costs for children. The cost for MHD's staff and capacity to address all lead-poisoned children in the city and the costs for lead investigations and case management for children not on Medicaid is approximately **\$17 million for lead assessors, case managers, and management systems at MHD.**

2. Advance lead education, outreach, and blood lead testing (\$14,724,000).

- \$5,000,000.** Lead outreach and education workers are needed to go door-to-door in neighborhoods with high concentrations of lead poisoning to encourage families with children under the age of six and women of childbearing age to be tested for lead poisoning, as well as to provide essential education and resources related to lead poisoning, lead abatement, and financial assistance resources available for the replacement of private-side lead service lines. Lead outreach workers should also be placed at clinics in neighborhoods with high levels of lead poisoning to make connections for family referrals and follow-up. **Grant funding for adding 30 lead outreach workers and 2 supervisors would be approximately \$5 million** over the APRA funds period. Transitional Jobs workers could potentially be hired as lead outreach/education workers with a \$7.25 per hour supplement to the Transitional Jobs payment of \$7.75 per hour to reach a \$15 per hour wage, which could lower costs below \$5 million.



- \$1,000,000.** The 2020 City budget included \$240,000 for MHD to purchase 2,400 Healthy Home Kits that include a water filter that filters lead, replacement filters, and lead education materials to be distributed to mothers as part of either prenatal or immediate post-birth care as

part of the Birthing Moms Pilot Project Proposal. Given delays due to the pandemic, only a fraction of the Kits has been distributed because of a lack of trained staff. COLE proposes that the promise of this Pilot Project should be realized over the ARPA funds period by devoting **\$1 million to hire additional staff to distribute the Kits to new mothers, to educate the moms about the risks of lead in and around their homes, and to purchase an additional 7,200 kits for birthing moms** who are residents of the targeted zip codes (on average there are about 2,400 births annually from these zip codes).

- **\$3,500,000.** Healthy Homes Kits can also benefit families with young children but who have not recently welcomed a new child or do not reside in one of the zip codes targeted by the Birthing Moms Pilot Project. Even under an ambitious pace for lead service line replacement in Milwaukee, the most optimistic projections will leave many children in homes with lead laterals for up to a decade. As a result, widespread distribution of lead-safe water filters through Healthy Homes Kits is needed now. \$3 million is needed to purchase Healthy Home Kits to protect 30,000 homes, including replacement filters (\$100/kit). To ensure the Kits are properly used, community partners will need grant funding to train and supervise three water filter technicians to distribute and install the filters in the Kits. Transitional Jobs workers could be hired as water filter technicians with a \$7.25 per hour supplement to the Transitional Jobs payment of \$7.75 per hour to reach a \$15 per hour wage, costing \$500,000 during the ARPA period. **The total cost of purchasing 30,000 Kits with water filters and training and employing three water filter technicians to ensure the water filters are properly installed is \$3.5 million.**
- **\$4,000,000.** Lead testing is necessary for lead poisoning prevention. The need for increased testing for lead poisoning is urgent and has been aggravated by the COVID pandemic. Marivel Montejano, Director of Home Environmental Health for the City of Milwaukee Health Department, said comparing 2019 data to 2020 data through September shows a 39% decline in lead tests performed and a 27% decline in the number of children tested. In addition, according to DHS records, although the City of Milwaukee tested 25,928 children in 2018, or about 47% of all children under 6 years old, only 1,379 children were tested between 3-5 years of age, or less than 10% of the children that should be tested between 3-5 years of age. This points to the importance of testing children in Early Childhood programs. To perform these pandemic “catch up” tests and the needed blood lead tests for 3-5-year-old children, rather than making parents take their children to testing outside of school, the City needs to hire more licensed practical nurses at Milwaukee Public Schools to specifically conduct blood lead testing right at the school. As of 2018-19, MPS reported 17,957 children enrolled in K-3, K-4, K-5, and first grade. The salary and benefits costs of **hiring approximately 18 additional LPNs to conduct 18,000 tests per year over the ARPA funds period, would be approximately \$4 million.**

- **\$224,000.** Creating and staffing a "lead hotline" information line at MHD is a critically needed service, so there is just one phone number to call to schedule a lead test, answer any lead poisoning questions, or to provide resource information about home lead abatement or lead service line replacement. MHD should provide training to City employees who staff the general social services hotline ("211") to direct callers to the "lead hotline" if appropriate.
- **\$1,000,000.** Creating and staffing a comprehensive lead awareness campaign to use social media, traditional media, and other outlets to inform Milwaukeeans of the risks of lead poisoning from water, soil, paint, and other sources is an important preventative measure and will also help direct families of lead poisoned children and pregnant women to essential services. As part of this campaign, Milwaukee should also widely publicize the above-mentioned "lead hotline." **The cost to develop and staff a lead awareness campaign is approximately \$1 million.**

3. Train the workforce needed to accelerate lead service line replacement (\$ TBD, pending further information from Milwaukee Water Works and workforce training partners).

Approximately 70,000 lead service lines (LSLs) remain in Milwaukee. Substantial funding to replace LSLs is anticipated from infrastructure funding packages expected to be adopted by Congress this year. The lack of a trained local workforce to undertake this work has [frequently been cited as limiting Milwaukee's ability to significantly scale up the replacement of LSLs](#), however, even if funding is increased. ARPA funds should be used to ensure that we have an equitable workforce ready to ramp up the replacement of LSLs when the anticipated influx of federal funds comes through. The City needs to begin a comprehensive effort to **fund workforce training for lead service line replacement.**

The City of Milwaukee should set a target of replacing all LSLs in the city within the next decade, by 2031. To achieve this goal, in concert with Water Equity Task Force partners, Milwaukee Water Works should estimate the types and numbers of workers needed to replace LSLs at a pace of 5,000 – 15,000 per year over 10 years. **A training on-ramp including paid training opportunities targeted towards communities most impacted by the pandemic is needed to ensure residents from these communities can secure the good paying jobs that will be created, including laborers, plumbers, inspectors, and water meter technicians, among others.** In addition, support should be provided to local contractors and sub-contractors engaged in, or who could become engaged in, water infrastructure work to enable them to prepare for upcoming opportunities to replace LSLs. This support should emphasize outreach to minority-owned, Milwaukee-based firms. These efforts should be undertaken with partners developed through the Milwaukee Water Equity Task Force and other community partners including COLE's workforce development committee, and in line with the Milwaukee Water Equity Roadmap.

Further analyses from Milwaukee Water Works and workforce development partners are needed to estimate the funds necessary to train workers during 2022 and 2023, so that these workers can be employed to replace lead service lines during 2023 – 2031 when the anticipated federal infrastructure funds are expected to be expended. **The Mayor and Common Council should work with Milwaukee Water Works and Water Equity Task Force partners to estimate the funding needed and prioritize ARPA and other funding to ensure these workforce training needs are fully addressed.**

Summary of COLE Proposal
All proposals cover the ARPA funds period 2021-24

Task (jobs created)	Cost (\$ mil.)
Lead abatement, and lead-related repairs, for 2,000 housing units	55
Relocation costs	6
Workforce development to accelerate lead abatement (250 jobs)	5
Lead risk assessors, case management (unknown MHD positions)	17
<i>Lead Abatement Subtotal</i>	83
Community outreach workers plus 2 supervisors (32 jobs)	5
Birthing Moms Pilot Project staff (3 jobs)	1
Healthy Home Kits and water filter technicians (3 jobs)	3.5
LPNs in public schools for testing (18 jobs)	4
Lead hotline	.224
Lead awareness campaign (3+ jobs)	1
<i>Education, Outreach, Lead-safe Water Filters, and Testing Subtotal</i>	14.724
TOTAL	97.724

In addition to the amounts listed in this table, ARPA funds should be allocated to train workers from communities most impacted by the pandemic to build the workforce needed for Milwaukee to fully utilize additional federal funding anticipated to replace all lead service lines in Milwaukee by 2031, using Milwaukee-based firms and workers. The Mayor and Common Council should work with Milwaukee Water Works and Water Equity Task Force partners to estimate the funding needed for workforce training.

Conclusion

For decades, Milwaukee has failed to adequately address the lead emergency threatening our communities. This failure has resulted in devastating lifetime impacts for thousands of Milwaukee children and families as well as broader detrimental impacts and costs from the “downstream” effects of childhood lead poisoning for the City at large in the form of [medical expenses, increased educational needs, use of social services systems, increased involvement with the juvenile justice system, adult incarceration, and homelessness](#). Communities suffering the most from lead poisoning are the same communities that suffered the greatest health and economic impacts from the pandemic, and these burdens continue to compound each other. **It is wholly appropriate to use ARPA funding to address Milwaukee’s longstanding lead emergency. COLE’s recommendations for the use of ARPA funding would finally make substantial headway to protect Milwaukee residents from the horrors of lead poisoning. In addition, these recommendations would create numerous good paying jobs for residents from Milwaukee communities that have been hardest hit by the pandemic.**

We welcome further conversation about our proposal and look forward to the opportunity to discuss how we can all make this the last decade when lead poisoning plagues the City. For further discussion, please contact Richard Diaz and Rev. Dennis Jacobsen, Chair of COLE and Chair of the COLE Advocacy Committee, respectively (please see contact info above). We appreciate your consideration of our proposal.

Comparison of MHD and COLE ARPA Funds Requests (Totals reflect funding over the ARPA funds period, 2021-24)			
	Category	Requests from MHD	Requests from COLE
	TOTAL	\$90,000,000	\$97,724,000
Lead Abatement	Lead Abatement (+ repairs for COLE)	\$50,000,000. \$50 million for Lead Abatement of 2,000 Homes: (500/year x 4 years)	\$55,000,000. Lead abatement, and lead-related repairs, for 2,000 housing units
	Family Relocation	\$6,000,000. \$6 million for Family Relocation/Temporary Housing	\$6,000,000. \$6 million for Family Relocation/Temporary Housing
	Lead Risk Assessment	\$17,000,000. \$17 million for Lead Risk Assessors, Case Managers and Management	\$17,000,000. \$17 million for Lead Risk Assessors, Case Managers and Management to sustain proactive response and actionable level of 5 mcg/dL EBL and above.
	Workforce Development	\$5,000,000. \$5 million for Apprenticeship/Workforce Training	\$5,000,000. \$5 million for Apprenticeship/Workforce Training in partnership with community-based organizations
	Health Strategist	\$500,000. \$500 thousand for a Health Strategist	\$0.
	Subtotal	\$78,500,000	\$83,000,000
Education, Outreach & Testing	Birthing Moms Pilot Project	\$0.	\$1,000,000. \$1 million for Healthy Home Kits and staff for Birthing Moms Pilot Project
	Healthy Home Kits (+ training for COLE)	\$3,500,000. \$3.5 million for Healthy Home Kits/Basic Abatement	\$3,500,000. \$3.5 million for Healthy Home Kits (beyond Birthing Moms Pilot Project) and to train and employ 3 water filter technicians.
	Community Health Workers	\$5,000,000. \$5 million for Community Health Workers (30 FTE + Managers)	\$5,000,000. \$5 million for 30 community lead outreach workers and 2 supervisors. Transitional Jobs would lower costs for some of these workers.
	Testing (+LPNs for COLE)	\$2,000,000. \$2 million for testing (does not include Lab - Lab is a separate request of \$5 million)	\$4,000,000. \$4 million for 18 LPNs to test children at MPS schools in K-3, K-4, K-5 and First Grade.

	Lead hotline	\$0.	\$224,000
	Lead Awareness Campaign	\$1,000,000. \$1 million for a Comprehensive Lead Awareness Campaign	\$1,000,000. \$1 million for a Comprehensive Lead Awareness Campaign and to publicize the lead hotline.
	Subtotal	\$11,500,000	\$14,724,000
LSLs	LSL Workforce Development	\$0.	\$ TBD Train LSL replacement workers. \$TBD in conversation with Milwaukee Water Works