# SCHOOL HEALTH INSPECTIONS

### **PUBLIC HEALTH ISSUE:**

The purpose of a school health inspection is to ensure that the environmental health and indoor air quality are protected inside of the school facility. Your job during the inspection is to identify any unhealthy conditions based on the school health inspection form, and report these to the school and NH Department of Education (NHDOE).

## **ROLE OF THE HEALTH OFFICER:**

- Prepare to inspect the school by bringing the right tools and contact the school to request forms and documentation are ready when you arrive.
- Inspect a school facility by using the NHDOE school health inspection form.
- Report the facility conditions to the school and NHDOE.
- Collaborate with the school staff to understand and address any environmental health issues found on the inspection.
- Understand these guidelines and seek out appropriate training to support school inspections (via the NH Health Officers Association).

**Recent changes to school inspections:** In 2017, the school health inspection process was changed to reflect a focus on priority health issues inside of the school. The school health inspection form no longer includes questions on fire safety or outdoor playground hazards, although you may note those issues in your comments. A school health inspection is required as part of the NHDOE's school approval process every few years (depending on the type of school), although a health officer can inspect, cite and correct problems at any time.

NHDOE requires the school health inspection to be performed by a local health official, not a school employee. It's the school's responsibility to contact the health officer to request an inspection, provide the school health inspection form, and to know the schedule for inspections. A schedule is available on the NHDOE website, provided at the end of this document. It's also the school's responsibility to submit a copy of the completed and signed school health inspection form to NHDOE and to keep a copy for their records. Health officers should keep a copy for their records as well. Kitchen inspections are not acceptable substitutes for the school health inspection.

# LAWS AND REGULATIONS:

RSA 189:24 regarding SCHOOL BOARDS, states that a standard school is approved and maintained "with suitable provision for the care of the health and physical welfare of all pupils." The rules for school inspections Ed 306.07 reference RSA 189. <a href="http://www.gencourt.state.nh.us/rsa/html/XV/189/189-24.htm">http://www.gencourt.state.nh.us/rsa/html/XV/189/189-24.htm</a>

- All <u>public schools</u>, <u>including charter schools</u>, must be in compliance with NH Administrative Rule Ed 306.07. Public schools undergo the school approval process every five years while most non-public schools are required to renew their approval status every three years. <a href="http://www.gencourt.state.nh.us/rules/state\_agencies/ed300.html">http://www.gencourt.state.nh.us/rules/state\_agencies/ed300.html</a>
- All <u>non-public</u> schools must comply with NH Administrative Rule Ed 403.01(c). http://www.gencourt.state.nh.us/rules/state\_agencies/ed400.html
- RSA 126-K:7 prohibits the use of tobacco products, e-cigarettes, or liquid nicotine on public school grounds. <a href="http://gencourt.state.nh.us/rsa/html/x/126-k/126-k-mrg.htm">http://gencourt.state.nh.us/rsa/html/x/126-k/126-k-mrg.htm</a>
- IPC 2009. International Plumbing Code. https://inspectapedia.com/plumbing/2009\_Plumbing\_Code\_IPC\_ICC\_Full\_Text.pdf
- RSA 200-12 HEALTH AND SANITATION, Requiring Changes; Condemnation. This law provides authority to the NH DHHS to assess, order changes, or condemn a school building. <a href="http://www.gencourt.state.nh.us/rsa/html/XV/200/200-12.htm">http://www.gencourt.state.nh.us/rsa/html/XV/200/200-12.htm</a>

# SCHOOL HEALTH INSPECTION FORM:

NHDOE's School Health Inspection Form should be used for all schools. You should print a copy of the form and review it before arriving. A current version of the form can be found within the Health Officer Manual, or at the NHDOE webpage: <a href="https://www.education.nh.gov/program/school\_approval/public\_approval.htm">https://www.education.nh.gov/program/school\_approval/public\_approval.htm</a>

**Inspection Tools:** In order to complete the inspection, you will need to have the following materials or instruments.

- A printed copy of this inspection guide, the NHDOE form, and a pen.
- A food-grade thermometer that can test hot water from 85 to 130 degrees.
- A strong flashlight to inspect in dark places.
- A camera or smartphone to record any conditions, certificates or licenses.
- (optional) Request a copy of the last completed school inspection health form, in order to see if conditions have improved.
- (optional) Request a floorplan of the school buildings with bathroom locations and current occupancy numbers.

**Inspection Date:** Choose a day when you expect to see normal operating conditions and people using all the facilities during the school year. You are allowed to inspect a school in the summer, yet a school inspected before the school opens won't reflect building conditions after classes begin. NHDOE recommends schools try to schedule their health inspection after September 15 but before December 15, in order to ensure that any problems are discovered and corrected earlier in the school year.

The form has 12 sections to complete, including:

1. **School Information:** Enter data to identify the school being inspected.

- 2. **Inspection Information:** Enter the name and contact information of the health officer, or whoever is doing the inspection.
- 3. **Information/Instructions:** Read the brief directions on completing the form. The form is set up as a checklist; however, a Health Officer may include notes on the form, take photos, or add attachments. Remember, the inspection form is used to describe the facility on that particular day, although you can make notes about any obvious past repairs, stains, or odors that reflect ongoing issues.

If needed, request and attach the following to the school health inspection form:

- If a septic system is on site, tank-pumping service reports
- If the building was built before 1990, asbestos inspection reports
- If animals are on site, animal vaccination certificates for dogs, cats, and ferrets, etc.
- If a pool is present, swimming pool testing records
- If on well water, water testing records for radon, PFCs, and lead hazards
- If food is prepared on site, a food service license
- A floorplan of the school with bathrooms noted
- Summary table of hot water locations & test results
- Summary table of drinking water fixtures, locations & any 'lead' test results

In your responses to the questions below, you can check off either 'Yes', 'No', or 'Unknown'.

- If 'YES' or 'NO', include any helpful notes, corrective actions, and a date the correction should be made by.
- If the response is 'Unknown', make a note as to why.
- If the response is '**Not Applicable**', then make a note as to why.
- 4. Sanitary Investigation: Inspect all areas and enter data.
  - Is there a presence of garbage, insects, rodents, or other unsanitary conditions?
  - O Document the conditions with photos and note this on the form.
- 5. **Restrooms:** Inspect all areas and enter data.
  - Are all restrooms clean and in working order?
     If not, please describe the location with a problem. Document with photos if needed.
  - Do all restrooms have hot water (85 to 110 degrees F), dispensed soap, toilet paper & dispensed paper towels or heated air dryers?
     Note: Test at least one (1) hot water tap in each restroom with a thermometer, and

record the average temperature, and time it took to reach temperature.

Inspect and note any missing dispensers for soap, paper or dryers.

- Is there at least one toilet fixture for every 50 people?
   Note: Document the number of toilet fixtures and divide by the number of occupants in that building. If the ratio is less than 1:50, make a note.
- 6. Food preparation, dining areas, sinks & water fountains: Inspect and enter data for the following items.

- If food is prepared on-site, is a current license from the municipality or state licensing authority posted?
  - If yes, note expiration date. Document with a photo if needed.
- Are toxic materials clearly labeled and properly stored away from food?
   Inspect to ensure any toxics or cleaners are labeled, and stored in a way that there is no risk of contaminating food.
- Is hot water (110 to 130 degrees F) available for culinary purposes, cleansing, laundry and building maintenance? (as per IPC 2009)
  - Note: Test hot water tap in each food prep area with a thermometer, record the average temperature, and time it took to reach temperature.
- Are all the water fountains clean with sufficient water pressure?
   If not, describe the location of the problem area.
- 7. **Septic and water supply systems:** Inspect and enter data.
  - Is there a pump schedule for the septic system?
     If available, view or document the pump receipts.
  - o Is there a reason to suspect the septic system has a system failure)? Evidence of failure may include backup into sinks, or odor of septic waste, or waste water on or near the leach field. If so, please describe the condition.
  - Is the well registered and tested as required?
     As per NH Dept. of Environmental Services (DES) administrative rule Env-Dw 700. If so, note the date of last test. If needed, take photo of paperwork.
     (Only required if the school's drinking water is supplied from an onsite well and the student and staff population is 25 or more).
  - In the past 2 years, has the school performed any voluntary water testing for lead, radon or PFCs?

If yes, document the dates or take a photo of any test results.

•	Findings of water test for lead:
•	Findings of water test for radon:
•	Findings of water test for PFCs:

- Note: As per a new NH Lead Law, starting on July 1, 2019 schools will need to test for lead in water at all drinking water fixtures (e.g. sinks, bubblers, or water filling stations, etc.). See RSA 130-A, as amended by SB 247-A. The NH DES is developing a protocol for how schools can test multiple water fixtures for lead in drinking water and will share this information with all health officers when completed.
- 8. Environmental hazards (mold, asbestos, lead paint, radon): Inspect and enter data.
  - Moisture damage or mold.
    - Is there a presence of water leaks in the ceiling, walls, or internal plumbing?
      - If so, please describe the condition and location.
    - Is there any mildew or mold present?
      - If so, describe the condition and location:
    - Note any evidence of 'visible mold' (e.g., signs of wet or dry mold or stains, mildew or mold on walls, ceiling, or floors).

- Note any conditions that may indicate 'hidden mold' (e.g., musty odors, damp conditions, water damage, history of water infiltration, etc.)
- Remember, almost every mold problem is a moisture problem. Focus on helping schools to identify and fix moisture problems, as well as, documenting any potential for mold growth.

### o Asbestos.

If any building used by students and staff was built before 1990 and this is a nonprofit organization, have school staff provided you with an asbestos inspection report showing its buildings are free of asbestos containing building material (ACBM). If build before 1990:

- Has there been an inspection within the last three years showing that areas with ACBM have been properly maintained?
- Note if you viewed asbestos paperwork. Document with a photo of the inspection report cover & date, if needed.

#### Lead Paint.

Was the school built before 1978? If no, skip this section:

- If so, is there worn or damaged paint on windows, doors, and door jambs?
- Inspect any damaged paint and note condition. Document with a photo if needed.
- If lead paint was identified, has any follow up testing been performed by a licensed lead inspector/risk assessor?

#### o Radon.

Has the school performed any voluntary air testing for radon?

- If so, are there test results available?
- Note any paperwork and radon levels. Document with a photo if needed.
- 9. **Smoking:** Inspect and enter data.
  - o Are there any signs of smoking in or near the building?
  - o Note if you find any cigarette butts or active smoking. RSA 126-K:7 prohibits the use of tobacco products, e-cigarettes, or liquid nicotine on public school grounds.
  - Are signs posted noting the prohibition of smoking on the school's grounds?
     Note if you find any signs posted or missing. Remind school staff that free signs may be available from NHDOE.
- 10. Animals on school property: Inspect and enter data.
  - o Are all animals enclosed by appropriate and lockable cages/stalls?
  - Do all animals have a current certificate of good health from a licensed veterinarian?
  - O Does it appear that animal fecal material is adequately cleaned from the cage/stall?
  - Is a handwashing station available nearby with hot water and soap for those students or staff handling the animals or cleaning the cages?
- 11. **Additional remarks:** Reflect on the inspection process, and add in any other notes you feel would be relevant to health issues, especially indoor air quality.

- This is a good place to write down any problems or risks not documented in other parts of the form.
- This is a good place to write down any 'action items' you expect the school to follow up on.

# 12. **Acknowledgments:** Sign and date form.

- o A school official needs to review sign and date the report.
- o A health officer needs to sign and date the report.
- o Ask the school staff to make a copy of the signed form for your records.

## **ENFORCEMENT ACTIONS**

The health officer is no longer required to approve or reject a school based on the inspection findings. The results are sent by the school administration to NHDOE and they will take any needed action. If you see a state law or local health code that has been violated, you may take immediate action on that specific issue as allowed by your local town ordinances. You are encouraged to contact NHDOE directly with any serious concerns you have. Their contact information is at the end of this document.

If your town does not have enforceable school codes and NHDOE has not taken action, you can report a health 'menace' to the NH DHHS Health Officer Liaison Program and cite the RSA 200 language below.

Citing or closing a school for health purposes: In accordance with RSA Chapter 200-12, if the "department of health and human services finds a school is in any respect a menace, or likely to become a menace, to the health or bodily welfare of the pupils or teachers, the department shall call the attention of the local board of health to the facts; and, if after a reasonable length of time the complaint has not been attended to in a satisfactory way, the department shall either order such changes as will in their judgment make the building safe and sanitary for school purposes or condemn the same and forbid its further use".

### **Environmental Health Resources for Schools:**

- EPA School Indoor Air Quality Training Program. A resource to identify and solve indoor air quality issues in school settings. <a href="https://www.epa.gov/iaq-schools">https://www.epa.gov/iaq-schools</a>
- EPA Healthy Schools, Healthy Kids. A resource for all school health issues, not just indoor air. <a href="https://www.epa.gov/schools">https://www.epa.gov/schools</a>
- NHDOE, School Health Services program helps schools with health education, HIV prevention, and school health issues.
   <a href="https://www.education.nh.gov/instruction/school\_health/index.htm">https://www.education.nh.gov/instruction/school\_health/index.htm</a>
- NH Health Officers Association. A resource for health officer training and support across the state. <a href="https://www.nhhealthofficers.org/">https://www.nhhealthofficers.org/</a>

For more information contact:

Bureau of School Safety and Facility Management NH Department of Education 101 Pleasant Street Concord, New Hampshire 03301-3852 603-271-8049

https://www.education.nh.gov/program/school approval/public approval.htm

On the NHDOE Public School Approval <u>website</u> or the Non-Public School Approval <u>website</u>, you can find:

- The School Health Inspection form
- The <u>School Approval Review Schedule</u>, which provides the school year in which the school is required to have a health inspection completed. The schedule is subject to change.

Bureau of Public Health Protection – Health Officer Liaison Unit NH Department of Health and Human Services 29 Hazen Drive Concord, New Hampshire 03301-6504 603-271-4072

https://www.dhhs.nh.gov/dphs/holu/index.htm

On the NH DHHS website, you can find this guidance and other school materials under the section on 'Inspections and Enforcement':

https://www.dhhs.nh.gov/dphs/holu/manual.htm