

Children's Health Protection Advisory Committee

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December 9, 2004

Michael Leavitt, Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue
Washington, D.C.

RE: Need for Coordinating EPA's Programs on School
Environments

Dear Administrator Leavitt:

The Children's Health Protection Advisory Committee (CHPAC) thanks the Agency for its leadership on school environmental health and safety issues, and especially EPA's leadership in working with other federal agencies. We particularly applaud the Agency's "healthy school environments" "one-stop shop" web portal, the school chemical cleanout campaign, and the innovative healthy school environment assessment tool now under development.

While these tools make a positive contribution to the school environment, a broader EPA approach to a healthy school environment is necessary if a child's "workplace" – the school – is to be safe from environmental hazards. EPA's approach to date has been fragmented, as indicated by the more than a dozen EPA schools-related programs in EPA's web portal. We believe that improved integration and coordination within EPA will assist state and local education, health, and environmental agencies. A coordinated outreach from EPA will reduce the number of agency contacts with school decision makers and also: (1) create and sustain a child health focus; (2) promote cost-effective prevention steps at the local level; and (3) provide supporting information to parents and communities about children's health and school environments. It will also help all members of the education community and organizations and individuals concerned about children's environmental health to make informed decisions about protecting children from harm.

There are more than 50 million children attending school each day in America. In view of EPA's existing statutory responsibilities for clean air and water, toxic substances control, pesticide use,

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asbestos, and so forth, and the challenges associated with controlling these exposures in the school environment, the Agency could sharpen its focus on healthy school environments by:

- designating a coordinating office for EPA's schools programs,
- providing adequate resources to the coordinating office and preserving resources within these schools-related programs at EPA, and
- supporting research on the relationships between school facilities and health, attendance, and learning as well as stimulating research evaluating EPA's existing programs.

More specifically the CHPAC recommends:

1. **Designation of a Coordinating Office** -- EPA should designate a cross-media coordinating 'home' within EPA to provide an intra-agency focal point for the Agency's multiple school-related programs. To elevate and sustain a child-centered preventive public health message, we recommend that you designate the Office of Children's Health Protection (OCHP) in the Office of the Administrator as the Coordinator, consistent with OCHP's cross-media approach to protecting children where they live, learn, and play. Coordination should include providing guidance to the Administrator and assisting EPA's programs in focusing their messages to the public and to school communities about children's health and school environments. OCHP should also convene and manage a cross agency senior level policy group to discuss and resolve policy issues. Coordination will streamline and increase the effectiveness of EPA's work to understand and improve children's health in learning environments throughout the nation.
2. **Resources** -- EPA should allocate to OCHP sufficient multi-year resources to carry out the proposed coordination initiative effectively. This is imperative given the already limited budget of OCHP. At the same time, EPA needs to ensure that the individual school-related programs in the other EPA offices also have sufficient resources to carry out their mission.
3. **Allocation of Research Budget** -- EPA should expand the portion of its research budget that is allocated to the understanding of the important relationship between school facility conditions and student's health, learning, and attendance. While children's academic performance is routinely tested at school, there is relatively little of the aforementioned research and little peer-reviewed published literature describing children's school exposures to environmental contaminants. Funding could stimulate university and inter-agency research, encourage private initiatives, and enhance the use and evaluation of EPA's voluntary programs, for example "IAQ Tools for Schools" and "Design Tools for Schools."

Given the scope of school environmental issues nationally (outlined in the attachment), these recommendations are essential to improving children's health. We believe them to be consistent with OCHP's draft strategic plan, which identifies the need for building capacity and raising awareness within and outside EPA on children's environmental health issues.

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Thank you for your consideration of our recommendations. Once again, we appreciate the work EPA is already doing on school environments. We look forward to hearing from you about our recommendations, and would be happy to discuss them with you.

Sincerely,



Melanie A. Marty, Ph.D., Chair
Children's Health Protection Advisory Committee

Attachment

Cc: Stephen Johnson, Deputy Administrator
Jeff Holmstead, Assistant Administrator for Air and Radiation
Susan Hazen, Acting Assistant Administrator for Prevention, Pesticides and Toxic Substances
Thomas Dunn, Acting Assistant Administrator for Solid Waste and Emergency Response
Benjamin Grumbles, Assistant Administrator for Water
William Sanders, Assistant Director, Office of Children's Health Protection
Joanne Rodman, Associate Director, Office of Children's Health Protection

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Attachment

Issue Background

More than 53 million school children and 6 million adults - 20 % of the entire U.S. population - enter our nation's schools every day to teach and to learn. Federal studies show that school facilities are generally poorly maintained (US GAO, NCES); schools may be sited near industrial plants or on abandoned landfills (ATSDR); new schools are being built beyond safe walking or biking distance for students (US EPA). Polluted indoor air, toxic chemical and pesticide use or spills, growing molds, lead in paint and drinking water, radon, and asbestos are issues of concern to EPA and also factors that can affect the health of children. According to EPA "studies show that one-half of our nation's 115,000 schools have problems linked to indoor air quality. Students, teachers and staff are at greater risk because of the hours spent in school facilities and because children are especially susceptible to pollutants." This comes at a time when about 6.3 million children have asthma, the leading cause of school absenteeism due to chronic illness. Multiplying the impacts, studies show the poorest students have the schools in the worst condition, buildings are more densely occupied and more intensively used than most offices, and districts are enrolling more students with health, learning, and behavior problems. The seven million-plus students in special education programs may be even more vulnerable to poor environments in school.

Sources of Information

Multiple EPA schools-related programs: www.epa.gov/schools

Total enrollment and employees: 53 million total public and private enrollment; public only enrollment projected at 48.2 million for 2004; 6 million total public school employees. National Center for Education Statistics, "State Nonfiscal Survey of Public Elementary/Secondary Education: School Year 2001-02", 2003.

Schools located on or near Brownfields/NPL sites: Agency for Toxic Substances and Disease Registry, with US EPA and Morehouse School of Medicine Regional Research Center for Minority Health, Oral Presentation at American Public Health Association Annual Conference, October 2001.

Contaminated sites: "Poisoned Schools: Invisible Threats, Visible Actions", Center for Health, Environment, and Justice, March 20001.

Walkable communities: US EPA, "Travel and Environmental Implications of School Siting", EPA 231-R-03-004, 2003.

Asthma: U.S. EPA. America's Children and the Environment, Second Edition, 2003, page 69. www.epa.gov/envirohealth/children/index.htm. Citing data from the Centers for Disease Control, www.cdc.gov/nchs/products/pubs/pubd/hestats/asthma/asthma.htm.

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Numbers of schools: US EPA "IAQ Tools for Schools," The National Center for Education Statistics reports that in 2001-2002 there were 94,112 public and 29,173 private schools in the U.S.

National Center for Education Statistics, Overview of Public Elementary and Secondary Schools and Districts: School Year 2001-02 (May 2003),
<http://nces.ed.gov/pubs2003/overview03/index.asp#a>.

Also NCES "Characteristics of Private Schools in the United States: Results From the 2000-2002 Private School Universe Survey" (October 2004)
<http://nces.ed.gov/surveys/publicsearch/pubsinfo.asp?pubid=2005305>.

Students in special education: 23rd and 24th US Department of Education/Office of Special Education Programs (OSEP) Annual Reports to Congress.

Numbers with disabilities: U.S. Office of Special Education Programs (OSEP), "Data Tables for OSEP State Reported Data," http://www.ideadata.org/arc_toc5.asp#partbCC.

Disabilities and vulnerabilities: Centers for Disease Control and Prevention and U.S. Department of Education National Institute on Disabilities and Rehabilitation Research, Healthy People 2010, Disabilities and Secondary Conditions,
www.healthypeople.gov/Document/HTML/Volume1/06Disability.htm#_Toc486927301.