

MUSC

MEDICAL UNIVERSITY
OF SOUTH CAROLINA

GENERAL PEDIATRICS
165 CANNON ST • STE 503
PO BOX 250855
CHARLESTON • SC 29425

(843) 792-9457
FAX (843) 792-2588

J. Rountz Reigart, MD
Director

William T. Bosca, MD
Paul M. Darden, MD
Wolton L. Ector, MD
Kathy Herwig-Lipke, MD
Melissa Howard Henshaw, MD
Sherron Jackson, MD
Michelle Lilly, MD
Colleen Moran, MD
James R. Roberts, MD
Sara E. Schuh, MD
Hazel M. Webb, MD

Patient Appointments
General Pediatrics Clinic
(843) 953-8444
Primary Care Clinic
(843) 792-3955

June 2, 2000

Carol Browner
Administrator
US Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Administrator Browner:

During the last three years significant progress has been made to advance Children's Health Protection initiatives nationwide; the efforts of the Environmental Protection Agency (EPA) under your leadership, are appreciated. Yet, as you are well aware, much more needs to be done. It is imperative that momentum be maintained and progress sustained. In this regard, the Children's Health Protection Advisory Committee (CHPAC) will come forward later this year with a comprehensive set of recommendations designed to strengthen the long term future of children's health protection initiatives. Specifically, CHPAC has discussed the strong need to institutionalize children's health activities at the federal, state and local levels and the need for a proactive information exchange on children's health issues. In the meantime, we understand that the EPA Strategic Plan is under revision; in this regard, CHPAC did not want to miss the opportunity to provide timely input. Fundamentally, CHPAC believes that the Strategic Plan can be strengthened by including greater focus and emphasis on certain children's health requirements, as specified in the following recommendations. Likewise, the Plan would be a positive step in the institutionalization process, which is vitally important.

To ensure a long life for your advances in children's environmental health and safety within the Agency, children's health must be included prominently in the EPA planning and accountability framework, documents and activities mandated by the Government Performance and Results Act (GPRA). We applaud the references to protecting children found in the current Strategic Plan, both as a principle to emphasize children's health and as a key cross-agency program. However in our view, these general statements while clearly necessary are not sufficient. Children's health must be woven explicitly and concretely into the objectives and sub-objectives of the plan to ensure that they are included in the annual performance goals by which the Agency is held accountable. Only when concern for children's health and their specific environmental hazards are included in all aspects of this strategic plan can we be assured of the institutionalization of your policies in the future of the Environmental Protection Agency.

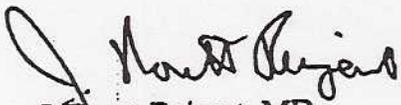
The Children's Health Protection Advisory Committee has two specific concerns:

- 1) The President's Task Force on Environmental Health Risks and Safety Risks to Children has made significant progress. They have produced an asthma strategy, *Asthma in the Environment: A Strategy to Protect Children* (1999); a research database, CHEHSIR Database (1999); and a lead strategy, *Eliminating Childhood Lead Poisoning: A Federal Strategy Targeting Lead Paint Hazards* (2000). The Strategic Plan should contain a commitment for on-going inter-agency collaboration, and outreach and engagement of stakeholders on these and other children's environmental health issues.
- 2) In the course of our deliberations we have been alarmed by the lack of basic scientific data about children's environmental risks and the lack of research dollars committed to children's health issues. In the relevant objectives and sub-objectives it must be clear that the environmental health risks of children are explicitly and consistently evaluated in EPA's risk assessments, risk characterizations, and environmental and public health standards.

We have specific recommendations for Goal 8 (Sound Science). In this section of the plan the Agency must make clear its commitment to advances in scientific knowledge with respect to children's environmental health. By 2003 EPA should develop measurements, methods, and models to evaluate exposures and effects of environmental contaminants on children and produce risk assessment guidelines for assessing risk to children for use in agency regulatory programs. Additionally the agency's strategic document should make clear its firm intent to use these children's risk assessments in the development of guidelines for the Agency's regulatory programs.

The CHPAC firmly believes that adoption of these recommendations will make the Strategic Plan a more meaningful and effective document and will further strengthen the cause of children's health protection. Your consideration in this matter is appreciated, and we look forward to further communications with you later in the year regarding the institutionalization of children's health protection.

Sincerely,



J. Boutt Reigart, MD

Chair,

Children's Health Protection Advisory Committee

JRR/pc