



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF  
CHILDREN'S HEALTH PROTECTION

November 1, 2021

Deanna Scher, Ph.D.  
Chair, Children's Health Protection Advisory Committee  
Minnesota Department of Health  
P.O. Box 64975  
St. Paul, Minnesota 55164-0975

Dear Dr. Scher:

Thank you for your July 12, 2021, letter in response to the Children's Health Protection Advisory Committee (CHPAC) charge on the U.S. Environmental Protection Agency's role in protecting children from environmental exposures in school and childcare settings. I greatly appreciate the time and expertise CHPAC gives to the Agency with the aim of protecting America's children where they live, learn, and play.

Your letter includes many recommendations and suggestions for strengthening EPA's role in promoting environmental health in school and childcare settings. The Office of Children's Health Protection has decided to renew its focus on schools and childcare settings. We are evaluating how best to coordinate EPA's work in this area and expect to develop a plan to build improved coordination of children's environmental health in educational settings both within EPA and across the federal agencies. We are starting by considering CHPAC's valuable recommendations as a starting point for strengthening EPA's approach to protecting children in schools and childcare settings. Among many ideas, we are considering the evaluation and dissemination of existing EPA educational materials; focusing outreach to communities with environmental justice concerns; expanding K-12 educational materials on environmental health; continuing collaborations with FCCLA and other youth groups; and addressing exposures such as lead paint and lead in soil.

In your letter, CHPAC identified environmental justice as an overarching priority area. This Administration is committed to making environmental justice a part of the Agency's mission and spurring opportunity for disadvantaged communities that have been historically marginalized and overburdened by pollution and underinvestment in water and wastewater infrastructure, housing, and health care. To this end, EPA has strategically planned the use of additional funding through the American Rescue Plan (ARP) toward projects that identify and address disproportionate environmental or public health harms and risks in underserved communities. Specifically, EPA's Office of Children's Health Protection launched a new grant

program, *Children's Healthy Learning Environments in Low-Income and/or Minority Communities*, in August 2021. Through this program, EPA will fund a total of \$2 million across the country for up to 10 cooperative agreements. Projects funded by this grant will build capacity in vulnerable communities to reduce children's environmental exposures in schools and childcare centers. Grantees under this program are encouraged to include meaningful community engagement, as you note the importance of in your letter.

ARP funds will support additional programming on children's environmental health in communities with environmental justice concerns, particularly during the COVID pandemic, consistent with the Pediatric Environmental Health Specialty Unit (PEHSU) mission "to improve reproductive and children's health by leading the integration of environmental health into clinical care and public health while supporting communities to address historical injustices and ongoing environmental racism and address the existential threat of climate change."<sup>1</sup> Training and educational opportunities will be targeted to socially or economically vulnerable communities as identified by EPA regional offices, or through existing PEHSU relationships with community groups, NGOs and others who work in overburdened and underserved communities. The PEHSUs will work with a variety of underserved communities – including rural, urban, tribal, immigrant and farmworker communities. Because the PEHSUs operate as a national network they can efficiently collaborate on technical questions and issues, yet each has ability to tailor their advice as needed for cultural sensitivity and language needs based on their regional location. Specific actions include training health providers, community health workers, assisting communities to make health-protective funding decisions, increasing virtual home visits to assess for environmental hazards, providing evidence-based education and outreach to communities and exploring options for pre-service training in minority serving institutions. PEHSUs will continue to work on exposure and health issues in school environments, on air quality issues that affect student and staff health, on school activity guidelines during wildfire events, and recently have focused on increasing understanding of safer disinfectant use during COVID-19.

While EPA does not have the statutory authority to fix school buildings or and has very limited funding for environmental health hazard mitigation in schools, EPA offers and encourages the use of technical assistance and training through programs such as the Healthy Learning Environments grant, Indoor Air Quality (IAQ) Tools for Schools, Energy Star, 3Ts (Training, Testing, and Taking Action) for Reducing Lead in Drinking Water in Schools and Child Care Facilities, and other initiatives. Additionally, through the Water Infrastructure Improvements for the Nation (WIIN) Act, EPA created the *Voluntary Lead Testing in School and Child Care Drinking Water Grant* program, as well as establishing a Memorandum of Understanding (MOU) with 14 federal and non-governmental organizations to assist states, territories, and tribes to implement lead reducing programs in school and childcare drinking water and to ensure results and activities are being communicated to the communities quickly and effectively.

Over the summer, the International WELL Building Institute, with support from the U.S. Department of Energy and numerous non-governmental partners, released the *2021 State of Our Schools: America's PK-12 Public School Facilities*. This report provides data on the condition of public school facilities, as well as inequities in environmental exposure. EPA will coordinate

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<sup>1</sup> [https://www.pehsu.net/About PEHSU.html](https://www.pehsu.net/About_PEHSU.html)

with other federal agencies to review this report and consider coordinated avenues to address the issues mentioned and possible ways to survey the environmental conditions in school buildings.

Your letter mentions shortcomings of EJSCREEN. As outlined in Executive Order 14008, “Tackling the Climate Crisis at Home and Abroad,” President Biden directed the Council on Environmental Quality to create a Climate and Economic Justice Screening Tool, building on EPA’s EJSCREEN, to identify disadvantaged communities and inform equitable decision-making across government. EPA, through the White House Environmental Justice Advisory Council, submitted a set of recommendations for developing the tool and which indicators to incorporate, including environmental exposures (e.g., air and water pollution), as well as indicators to give a comprehensive picture, such as nearby trains carrying hazardous materials, presence of Dollar Stores, food insecurity, and rates of low birthweight and pre-term birth.<sup>2</sup> OCHP will explore adding a layer of settings, such as schools and childcare centers, with the Office of Environmental Justice.

As you note in your letter, ambient and indoor air quality is a vital consideration in and around schools. As you are aware from the July 2020 CHPAC meeting, EPA was updating its *Best Practices to Reducing Near-Road Pollution Exposure at Schools*. The final publication, released in October, includes case studies and infographics. In addition, EPA is providing support to the Department of Education (ED) as funding is distributed under the ARP and CARES Acts to guide healthy indoor air quality ventilation investments, including IAQ technical resources and guidance; information on ventilation and filtration activities in ED’s ARP Use of Funds Guidance, and IAQ subject matter expertise for ED sponsored webinars.<sup>3</sup> EPA’s Office of Air and Radiation will continue to explore additional venues and programs to provide technical support and financial assistance to schools, as appropriate and available. Additionally, last month, EPA announced two school bus rebate opportunities, of approximately \$17 million in combined funding, for schools and bus fleet owners to replace older, highly polluting diesel school buses through the 2021 American Rescue Plan Electric School Bus Rebates program<sup>4</sup> and the 2021 Diesel Emissions Reduction Act (DERA) School Bus rebates<sup>5</sup>. Replacing these buses will improve air quality around schools and communities, reduce pollution and better protect children’s overall health. Applications for this grant are due November 5, 2021.

EPA is at the center of delivering this Administration’s focus on climate and equity; preparing for and mitigating disasters is an important part of our climate strategy. As you note, EPA has long supported children’s environmental health research. On September 16, 2021, EPA released a new funding opportunity totaling \$8.1 million through the Science to Achieve Results (STAR) Program: *Cumulative Health Impacts at the Intersection of Climate Change, Environmental Justice, and Vulnerable Populations/Lifestyles: Community-Based Research for*

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<sup>2</sup> [https://www.epa.gov/sites/default/files/2021-05/documents/whejac\\_interim\\_final\\_recommendations\\_0.pdf](https://www.epa.gov/sites/default/files/2021-05/documents/whejac_interim_final_recommendations_0.pdf)

<sup>3</sup> <https://oese.ed.gov/offices/american-rescue-plan/american-rescue-plan-elementary-and-secondary-school-emergency-relief/>; <https://bestpracticesclearinghouse.ed.gov/index.html>; <https://bestpracticesclearinghouse.ed.gov/resource-library.aspx>

<sup>4</sup> <https://www.epa.gov/dera/2021-american-rescue-plan-arp-electric-school-bus-rebates>

<sup>5</sup> <https://www.epa.gov/dera/rebates>

*Solutions.*<sup>6</sup> Applications for this grant are due November 16, 2021. This program is in addition to two STAR programs announced over the summer: \$3.8 million for Centers for Early Lifestage Vulnerabilities to Environmental Stressors<sup>7</sup> and over \$9 million for research to better estimate children’s chemical exposures from soil and dust ingestion.<sup>8</sup> To mitigate children’s exposures during and after disasters, in June 2021, EPA collaborated with the National Institute of Standards and Technology and ASHRAE, formerly called the American Society of Heating, Refrigerating and Air Conditioning Engineers, to release interim guidance, *Planning Framework for Protecting Commercial Building Occupants from Smoke During Wildfire Events.*<sup>9</sup> The planning framework includes steps schools and other commercial buildings can implement when smoke is forecast or during smoky days to reduce occupants’ exposure to PM2.5. You recommend that EPA update several key web pages to include disasters and school-specific information; OCHP plans in the coming year to undertake a review of its website, including [epa.gov/schools](https://epa.gov/schools), and will consider your input, as well as your recommendation to promote existing, useful guidance developed by other federal agencies and expert organizations, such as PEHSUs. To support safe drinking water in schools and childcare centers reopening after extended closures, EPA developed factsheets to provide guidance on maintaining drinking water quality during closures and start-up procedures when reopening to ensure that drinking water is safe for consumption.<sup>10</sup> Further, EPA is using ARP funding to provide technical support to create cleaner air and neighborhood cooling refuges for vulnerable communities. *Schools as Community Cleaner Air and Cooling Centers* will: improve ventilation and filtration systems in public school facilities to reduce the risk of COVID transmission and other airborne illnesses in schools; create healthy learning environments through improved indoor air quality in schools; keep schools open over the long-term in the face of increased frequency and severity of extreme heat events and wildfire smoke events; and create cleaner air shelters and cooling centers located in areas known to have a higher number of people who are susceptible to serious health impacts from extreme heat and wildfire smoke. EPA solicited letters of interest and expects to select up to four recipients this fall.

EPA is taking a number of actions to reduce exposure to lead in drinking water. As mentioned above, WIIN grants and the 3Ts for Reducing Lead in Drinking Water in School and Child Care Facilities (the 3Ts program), and the 3Ts MOU provide resources and guidance to schools and childcare facilities to reduce lead exposures. The WIIN Act also established the *Reducing Lead in Drinking Water* grant which funds projects to conduct lead service line replacements, corrosion treatment improvements, and remediation at schools and childcare facilities in underserved and disadvantaged communities. Through the MOU, EPA has worked with the MOU partners to develop annual workplans, which serve as the mechanism that measures and tracks progress of the MOU outcomes, objectives, and activities. The 3Ts program

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<sup>6</sup> <https://www.epa.gov/research-grants/cumulative-health-impacts-intersection-climate-change-environmental-justice-and>

<sup>7</sup> <https://www.epa.gov/newsreleases/epa-awards-38m-create-research-centers-early-childhood-developmental-health>

<sup>8</sup> <https://www.epa.gov/newsreleases/epa-awards-over-9-million-research-better-understand-exposure-young-children-chemicals>

<sup>9</sup> <https://www.epa.gov/sciencematters/guidance-available-prepare-schools-commercial-and-public-buildings-wildfire-smoke>

<sup>10</sup> <https://www.epa.gov/ground-water-and-drinking-water/audience-factsheets>

and associated tools serve as the base to implement the MOU, coordinate activities across federal agencies and with non-federal partners, develop plans and schedules, and track progress.

In October 2019, EPA announced the signing of the revised MOU partnership not only with HHS, but with a total of 14 federal and non-federal stakeholders. Since then, EPA has actively engaged and coordinated its efforts with the MOU partners. EPA staff have had one-on-one focused discussions with HHS's Office of Child Care and Office of Head Start (OHS) and with the Department of Education, Centers for Disease Control and Prevention, and the Department of Agriculture to address implementation matters and better leverage resources for coordinated outreach and/or funding. In addition, EPA held its semi-annual working meetings and regularly engages with all the MOU partners to develop and implement workplans. For example, OHS used the 3Ts products in its outreach efforts to head start programs. EPA has also collaborated with the Department of Education's Office of Safe and Supportive Schools to provide input on the Readiness and Emergency Management for Schools Technical Assistance Center materials and to disseminate 3Ts training and tools.

At the same time, EPA is currently reviewing the Lead and Copper Rule Revisions (LCRR) in accordance with E.O. 13990 to follow the best science to address lead in the nation's drinking water. On June 10, 2021, EPA extended the LCRR effective and compliance dates to take the appropriate time to review the LCRR and make sure communities that have been impacted the most are protected. To that end, EPA recently wrapped up a series of virtual engagements including public listening sessions, ten community roundtables, a Tribal roundtable, a national stakeholder roundtable, a meeting with organizations representing elected officials, and a meeting with state co-regulators where the Agency obtained valuable input from the public, stakeholder groups, Tribal representatives, local officials, and communities impacted by lead exposure. EPA is in the process of reviewing participant input and written comments and is considering additional actions, including whether additional revisions to the LCRR are necessary.

As you note, EPA is currently reassessing the lead dust standards, as well as lead-based paint and lead in soil standards. EPA will comply with all court instructions in its review.

Due to the COVID-19 pandemic, we all have an increased awareness of the importance of using disinfectants safely, especially around children. EPA maintains a list of Design for the Environment (DfE) certified disinfectants,<sup>11</sup> several of which are already included on List N: Disinfectants for Use Against SARS-CoV-2 (COVID-19). EPA has created infographics on safe disinfectant use, including *6 Steps for Safe and Effective Disinfectant Use*<sup>12</sup> and *Cleaning and Disinfecting: Best Practices During the COVID-19 Pandemic*.<sup>13</sup> EPA will continue to explore effective ways to disseminate this and other existing information broadly, including to schools and childcare facilities serving low-income communities and communities of color. EPA will also consider additional ways to increase educational outreach to provide existing resources to

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<sup>11</sup> <https://www.epa.gov/pesticide-labels/dfe-certified-disinfectants>

<sup>12</sup> <https://www.epa.gov/sites/default/files/2020-04/documents/disinfectants-onepager.pdf>

<sup>13</sup> <https://www.epa.gov/sites/default/files/2021-04/documents/cleaning-disinfecting-one-pager.pdf>

schools and childcare programs on integrated pest management practices, including the safe use of disinfectants.

Thank you for all your ideas on additional activities to enhance EPA efforts specific to children's environmental health in school and childcare settings, including improved outreach of existing EPA materials, educational materials for students and school and childcare professionals, suggested partnerships, and steps to advance research on school and childcare environments and children's health, among many other useful recommendations. I have shared your input with EPA's Office of Public Engagement and Environmental Education, Office of Research and Development, and other relevant offices. As mentioned above, OCHP is reorganizing its website to be more user-friendly and will seek to highlight existing, high quality resources, guidance, and tools from EPA and other federal agencies as much as possible.

As you note, children's environmental health in school and childcare settings is relevant to many offices within EPA and across multiple federal agencies. EPA is working closely with the Domestic Policy Council, Department of Education, Department of Energy, and other federal agencies through an Interagency Policy Committee on child development, academic success, and safe, healthy, and environmentally just school buildings. In addition, EPA's FY2022-2026 Draft Strategic Plan includes a new focus on children's health. *Cross-Agency Strategy 2: Consider the Health of Children at All Life Stages and Other Vulnerable Populations* will enhance coordination between all EPA programs to provide leadership in children's environmental health and strengthen and expand partnerships; address disparities; and use science and policy to strengthen protections for children at all life stages.

Finally, thank you for the comprehensive list of key parties and collaborators in schools and childcare. We will consider these important groups as we plan future outreach. I realize you included many additional recommendations that I have not specifically addressed above, however I have shared them with the relevant offices, and EPA will consider your input as we continue to set priorities and address environmental exposures.

Thank you again for your letter. CHPAC's efforts and recommendations are greatly appreciated by EPA, and I look forward to continuing to work with you and the rest of the CHPAC. If you have any questions or concerns, please contact me at [briskin.jeanne@epa.gov](mailto:briskin.jeanne@epa.gov) or (202) 564-4583.

Sincerely,



Jeanne Briskin