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May 2, 2002

The Honorable Christine Todd Whitman
Administrator
U. S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20406

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Dear Administrator Whitman:

Thank you for your continuing leadership in protecting children from environmental threats to their health. Given the growing body of data on susceptibility of children to toxic exposures, prevention, identification, and correction of environmental health threats at schools is an important and necessary step in the protection of children's health.

Schools are the daily workplaces of over 55 million Americans, the majority of them children. Children may be in school from the early bus run and breakfast program, through homeroom, classes, and after school activities, a substantial part of their day. Because of deferred or inadequate maintenance, over half of these densely occupied and heavily used community facilities may pose significant health risks from indoor contamination due to such sources as poor ventilation, bioaerosols, peeling lead paint, asbestos, and pesticides. Children, particularly children with asthma and other chronic conditions as well as those with learning disabilities, may be more vulnerable to environmental threats. Yet no comprehensive federal regulations exist to protect child health in the school setting.

The United States General Accounting Office estimated that over 14 million children are in schools that threaten their health. The GAO and National Center for Education Statistics have estimated that at least 30- 40% of schools have poor indoor air. Today, federal, state, and city agencies are grappling with the nation's asthma epidemic that has become America's leading cause of school absenteeism due to chronic illness. The GAO also reported that one-third of our public schools need new or upgraded roofs, walls and plumbing as well as new or updated heating, electrical and lighting systems. The American Society of Civil Engineers reports that our schools are in worse condition than any other infrastructure including prisons. When schools are closed due to mold contamination, asbestos releases, chemical spills, or even terrorism attacks, there are no standards for re-occupancy of the facility by children. There is no system to track student illness and injury or emergency school closures.

Dramatic increases in enrollment mean that many schools have far more students than they were designed to accommodate. The results are ventilating systems that cannot meet the air flow needs of occupants and indoor air pollution that hinders learning. It is not uncommon for classrooms to be placed in non-instructional spaces such as closets. Many schools cope with overcrowding through the use of portable classrooms.

Over one-third of schools nationwide report using portables. California has found that portables have inadequate health and safety standards. The health threats to children in these overcrowded schools should not be underestimated.

The magnitude and the complexity of the problems affecting schools in thousands of communities across America demonstrate that local jurisdictions are ill-equipped to handle these problems alone. School communities need reliable information about the risks to children's health from exposure to environmental contaminants and about the impacts on learning. It is essential that EPA take a leadership role in addressing these issues.

While EPA and other federal agencies have a wide range of existing initiatives to assist schools in meeting environmental and energy challenges (e.g., Indoor Air Quality Tools for Schools, Integrated Pest Management, Energy Star Schools), these efforts are under-funded and underutilized, especially by schools serving the neediest children. In addition, these and other federal, state and local programs addressing school environmental health issues are not well coordinated. Thus, school and community access to reliable information and coordinated support is difficult. Information and guidance need to be integrated and easily accessible via prominent forums such as EPA's homepage where there should be a specific link to school environment issues.

Today, we have a remarkable opportunity to build on the growing interest in healthier learning environments. The newly created Schools Workgroup of the President's Task Force on Environmental Health Risks and Safety Risks to Children demonstrates a recognition that these issues are critically important and creates the structure to develop more coordinated and efficient federal leadership and assistance. In addition, the recently enacted "No Child Left Behind Act of 2001" includes a required priority for a Department of Education (DoEd) research study on the impacts of decayed buildings on children's environmental health and safety and authorizes DoEd to create a federal "high performance schools" assistance program that would establish state-based programs for healthier school facilities.¹

As Administrator of EPA, you can further help improve child environmental health through implementing the following recommendations:

Coordinate and leverage existing federal programs and resources.

The CHPAC is extremely pleased that The President's Task Force on Environmental Health Risks and Safety Risks to Children has identified school environmental health as a priority. We urge you to use this mechanism to work closely with the Secretaries of Education, Health and Human Services, Energy and others to coordinate existing federal programs for school environments and children's environmental health. We hope that the task force will identify

¹ Section 5586 states that "the term 'healthy, high-performance school building' means a school building in which the design, construction, operation, and maintenance (1) use energy efficient and affordable practices and materials; (2) are cost-effective; (3) enhance indoor air quality; and (4) protect and conserve water."

key environmental science and policy gaps that impede the administration's education goals and develop a strategic plan for addressing these issues.

In developing this strategic plan, the task force should solicit the views and experiences of environmental health professionals, parents, educators, designers, contractors, government and industry groups with an interest in producing and maintaining healthy learning environments, to share ideas and to establish best practices.

We also recommend that EPA encourage the DoEd to fund and to implement, with EPA assistance, the school environmental health provisions contained in the recently enacted No Child Left Behind Act. We understand that these provisions have not been provided with explicit appropriations, yet they are critically important to moving the issue of children's health in schools forward and in raising awareness in the DoEd and among the states of the important role which healthy school facilities play in protecting children's health and supporting their education.

Establish healthy school environments as an EPA priority.

We urge you to establish children's environmental health at school as an EPA priority. EPA can and should establish mechanisms to ensure that existing school environmental programs are focused on prevention and early intervention and that they are well coordinated, effectively evaluated and appropriately funded. We applaud your already considerable efforts to move these programs forward, and encourage you to continue to emphasize to your senior staff the importance that you place on programs that support healthier environments for children at school.

We urge that EPA communicate this priority widely. EPA should develop and implement an integrated public information and education communications strategy on children's environmental health in schools. The development and implementation of the strategy should be conducted in collaboration with EPA regional offices, state and local agencies, parents, health providers, researchers, the private sector, and the wide range of other education, public health, and environmental constituency groups. An integrated strategy would be extremely beneficial to public and private schools and others who need information on these issues but have difficulty sorting out and accessing the many programs already in place.

EPA should lead the development of research on child environmental health at school.

In addition to collaborating with DoEd on the impacts of decayed buildings on child health, EPA is uniquely qualified to and should develop a major research program to evaluate school facility environmental conditions and practices, and resulting adverse effects on student health and performance. As a first step, there should be an evaluation of existing research and data and the relevance of this information to environmental exposures, academic performance, and long-term health.

While there is some direct evidence as well as substantial indirect evidence that the condition of school facilities impacts children's health, productivity and learning, few studies to date have been completed that directly examine these relationships. EPA's extramural STAR (Science to Achieve Results) grant program would be an effective mechanism for stimulating increased academic research in this area. We urge you to direct the Office of Research and Development to support research into the relationship between environmental exposures and health and student performance from an integrated whole-building perspective. In addition, ORD should expand efforts to assess the kinds and degrees of exposures of children to environmental contaminants in schools.

Evaluate and document the effectiveness of existing EPA school environmental health programs, such as IAQ Tools for Schools.

While anecdotal evidence indicates that IAQ Tools for Schools and other school programs have significant benefits to those schools that implement major portions of the program, significant resource and institutional barriers to full program implementation exist. An appropriately funded evaluation documenting its benefits (e.g., reduced absenteeism, asthma attacks, toxic exposures, or the preservation of the facility) would help school districts and the states understand the value in investing in this and similar programs, as well as help EPA identify ways to improve its overall programs.

Expand best practices standards and guidance for the construction, cleaning, and maintenance for existing, new, and renovated schools.

While EPA has developed a wealth of useful information for individual schools, some critically important gaps remain. We recommend that EPA develop and widely disseminate best practices guidance on school construction and renovation. By working with the DoEd and DOE, EPA can help ensure that "high performance school facilities" programs are encouraged in all the states. New guidance must also include "building commissioning" procedures to ensure that when construction is complete that all the building systems perform as expected, and include sample contract and oversight procedures to ensure that the health of occupants in schools under renovation is protected. As part of this construction and design guidance, we urge EPA to identify environmental considerations which local communities should take into account as they select sites for locating new schools. For example, EPA could help highlight such important considerations as agricultural pesticide drift, proximity to freeways and hazardous facilities.

Basic cleaning and maintenance of schools are critical to preserving facility infrastructure and to protecting child health. EPA should therefore enhance the utilization of integrated pest management (IPM) for schools and create or expand guidance on how schools can implement environmentally preferable purchasing for instructional, cleaning, and maintenance products for schools. New or expanded guidance should also include information on cleaning and maintenance techniques and procedures that prevent environmental threats. Another area of concern is how best to communicate information about environmental hazards to school occupants and others in the school community. In each of these areas, EPA should also develop

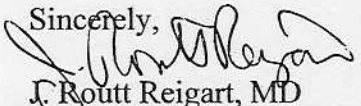
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model' school district-wide policies for adoption by boards of education that will institutionalize best practices locally.

Communities also need help in the identification of existing health and safety risks and how to respond effectively and efficiently to those identified. EPA could provide invaluable assistance to school districts by developing a best practices assessment tool to evaluate health and safety risks to child health, provide guidance for the evaluation of inspection results, assist in priority setting, ensure performance tracking and provide mechanisms for reporting results. Some educational agencies (e.g., the Los Angeles Unified School District, State of Washington) have developed models in this area. The EPA should look at them as potential models for national best practices guidance.

The CHPAC believes that EPA could make a significant contribution in the near term by addressing the issues discussed above. As you know, however, the environmental issues affecting schools and children's health are both numerous and complex. (e.g., the continued presence or use of CCA-contaminated materials in playgrounds). Many schools and communities are now wrestling with the question of when is it safe to reoccupy a school facility following an evacuation due to a fire, infection outbreak, chemical spill, mold contamination, asbestos release and/or lead contamination, indoor air pollution event or, in extreme cases, a terrorism related event. Recent studies also clearly link asthma to diesel exhaust; and new studies show that school children transported to school in older diesel-fueled buses have higher exposures to air pollutants.

We look forward to hearing your views on these recommendations and would welcome the opportunity for an ongoing dialogue with you and appropriate EPA staff as you address children's environmental health at school. The Children's Health Protection Advisory Committee stands ready to assist you in any way possible to ensure that schools provide a healthy learning environment for our children.

Sincerely,

J. Routh Reigart, MD
Chair, Children's Health Protection
Advisory Committee

JRR/pc

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