



Coalition *for* Healthier Schools

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the forum for environmental health at school, since 2001...*

Coordinated by Healthy Schools Network

August 28, 2021 – via email

The Honorable Charles Schumer
Senate Majority Leader
322 Hart Senate Office Building
Washington, DC 20510

The Honorable Nancy Pelosi
Speaker, House of Representatives
1236 Longworth HOB
Washington, DC 20515

**RE: Reconciliation Act:
Children’s Hospitals Raise New Alarm About COVID and Children;
Congress Must Fund US EPA to Advance Indoor Air/Ventilation in Schools**

Dear Majority Leader Schumer and Speaker Pelosi:

Today, Sunday, August 28, the New York Times ran a full-page ad, “Protect Our Children - A Message from the Nation’s Children’s Hospitals”, calling on leaders in the public and private sectors to help protect children. As you know, the CDC acknowledged the pandemic was airborne on May 7, 2021, a full month after the last COVID Relief bill was passed. CDC also elevated indoor air and ventilation as a new priority to help reduce the presence of the virus in indoor environments such as schools.

US Environmental Protection Agency is the only federal agency with authorizations, programs, grants, successes, and expert staff on indoor air and ventilation in schools and child care facilities. But EPA funds and staff to address indoor air and ventilation have been gutted.

We, the undersigned 80 organizations and 48 individuals, write to urge reconciliation act funding for US EPA to help address the continuing, unresolved risks of poor indoor air and ventilation in our nation’s schools and child care facilities, and to support the expansion of pediatric environmental health services for children at risk. Unbelievably, in this airborne pandemic, EPA, the agency that chairs the Federal Indoor Air Quality Council and which has 25 years of successes with K-12 schools, has not received any funds to boost its education and training outreach programs on indoor air and ventilation in schools and child care facilities.

During this unyielding pandemic, with more school-age children infected and hospitalized than ever before – and schools are barely open for the fall session -- schools must have clean, fresh air. It is one more critical layer of mitigation that may help children and staff stay healthy, despite the surging Delata variant. The nation and its children, many in the poorest and or most remote areas, have just endured a year school closures and lack of access to education. They should not endure another year because Congress could not find a way to support CLEAN AIR IN EVERY SCHOOL.

We believe EPA's budgets for indoor air and children's health must be expanded proportional to the risks, especially to the Black, LatinX, and Indigenous communities and to their children who have the schools in the worst conditions. Specifically, the budget must restore and expand funding to the offices in EPA most critical to keeping schools open safely, in COVID and in prepare them to help mitigate climate as well.

CLEAN AIR IN EVERY SCHOOL. Understanding that poor indoor air is common in schools and that it erodes children health and ability to learn, and in the face of the continuing airborne infective virus, we urge that \$65 Million over FY 21 be directed to EPA's Office of Air and Radiation/Indoor Environments Division's to restore and expand its Reducing the Risks of Indoor Air program and \$10 Million over FY 21 be directed to Office of Children's Health Protection to restore and expand pediatric environmental health assistance. (\$65M is \$1/child enrolled in public schools and child care facilities.) The offices provide voluntary education, technical assistance, and related grant programs to educate communities, parents and personnel, schools, states, and tribes on how to improve Indoor Air and fix other problems of educational facilities, as well as consult on children's exposures.

EPA Authorizations

- 1- The primary statutory authorities **EPA/Office of Air and Radiation/Indoor Environment Division** relies on for Reducing the Risks of Indoor Air **program** (both program activities and staffing) to carry out its non-regulatory program are:
 - Superfund Amendments and Reauthorization Act (SARA) Title IV – Radon Gas and Indoor Air Quality Research Act of 1986
 - Toxic Substances Control Act (TSCA) Title III – Indoor Radon Abatement Act of 1988 (addresses only radon)
 - Clean Air Act (CAA), §103(b)(3) – (grant authority)
 - There are additional statutes that relate to indoor air quality, e.g., other portions of TSCA, CERCLA, FIFRA, but those statutes are implemented by other programs in the agency.
- 2- The **Office of Children's Health Protection** is authorized via the Executive Order 13045, Risks to Children's Health and Risks to Children's Safety and a memo written by Carol Browner.

Background.

There are 98,000 school buildings enrolling 51 million children. That is more children in fewer schools with fewer staff than five years ago. **Schools are more densely occupied than nursing homes and 40% of children have chronic health conditions (CDC).** Poor indoor air quality can be a severe health risk in 'normal times' for the 6 million American children with asthma, the leading cause of school absenteeism due to chronic illness. About half of school children rely on subsidized meal programs, and half are children of color. An estimated 40% of all school children had no internet or devices at home during the past school year.

The Black, LatinX, and Indigenous communities hit hardest with COVID, and with lower vaccination access and rates, have the schools in the worst conditions. These continuing disparities are intolerable and immoral. It will take sustained, deliberate work by US EPA

for the coming 10 years to help communities erase the decades of neglect of school facilities nationwide.

- EPA launched its Indoor Air Quality (IAQ) Tools for schools program in 1995, precisely because schools 1- did not know how to maintain their air handling systems, and 2- rural-remote and BIPOC and other poverty schools could not access or afford pricy consultants to advise or fix facility operating systems.
- EPA has the credibility and the K-12 contacts, but insufficient funds to help mitigate the COVID threats and improve overall climate resiliency and mitigation by schools.
- Indoor Air consultants are not certified by any public agency; thus, EPA's well-researched and well-tested guidance programs offer sound basic information on how to prevent, or identify and fix, facility problems that impact indoor air, and provide a free check-in point for schools encountering unscrupulous or simply less-practiced vendors.
- K-12 leaders are NOT required to have any training or knowledge in facility management, which can lead to decision based on *small-p politics* rather than on sound science.
- In the relative absence of EPA in the last 18 months, and without sound guidance, schools have made bad decisions, such as using foggers and electrostatic sprayers to douse surfaces and the air with anti-microbial pesticides. Schools have also invested in dangerous ozone-producing classroom air cleaners which damage lungs.
- In EPA's absence due to severe budget cuts, in 2019, schools were clearly not pandemic-ready, and just as clearly, they were not weather resilient nor climate-ready either.
- A 2020 US GAO report found tens of thousands of schools needed updated or all new ventilation systems. In July 2021, an Ed Week Research survey reported that half of schools had urgent concerns about air conditioning and ventilation. **This strongly indicates that the 2019 deficiencies that interfered with reopening schools in 2020 were not addressed.**

EPA is the only agency, not CDC and not Education, which has authorizations, critical technical information, and educational grant programs to help parents, communities, education leaders, and personnel understand how to keep school buildings open safely and how to reduce barriers to learning. EPA's Indoor Environments Division has a 25+ year history of programs and guidance on aspects of indoor environments like indoor air quality, molds, hazardous chemical management, and flood repairs to schools and child care facilities. Further EPA is continuing to build on its archive of training programs that, ten years ago, had spurred a learning network on school facilities operated as healthy places for children and staff. The children's office supports pediatric environmental health services. The science has only grown over the decades, with the most recent publications on moving air to reduce the viral load from UC Davis and Johns Hopkins, while the Harvard School of Public Health's "Schools for Health" recaps the leading science on healthful indoor environments for learning and contributed significantly to media's understanding of how the virus is transmitted.

Today, K-12 schools are receiving an estimated \$200+ billion in COVID relief, not to mention Nutrition aid, but not one dollar must be spent on indoor air or ventilation in schools in the airborne pandemic. Keeping schools open is crucial to keeping the economy open and children healthy. Climate change also adversely impacts indoor environments and health (IOM 2011). A proportional and timely response to the real risks of contaminated indoor air to children who are required to attend school is needed now from EPA, from congress, and from the Biden administration.

A proportional response must restore and expand support for the Office of Air and Radiation/Indoor Environments Division working under its authorizations from the Clean Air Act and Superfund Amendments and Reauthorization Act to host annual symposia and provide education and training to school personnel, districts, and non-governmental organizations, states, tribal nations, and communities both nationally and regionally. A proportional response should also support the Office of Children's Health Protection's grants to pediatric environmental health experts and researchers.

CC Senator Tom Carper, Chair, Senate Environment and Public Works Committee
Representative Frank Pallone, Chair, House Energy and Commerce Committee

Point of Contact: Claire L. Barnett, Coordinator, Coalition for Healthier Schools and Executive Director, Healthy Schools Network, 153 Regent Street, Ste. 1050, Saratoga Springs, NY, 12866, (w) 518-462-0632, (m) 202-543-7555, info@healthyschools.org

Sincerely,

Alaska Community Action on Toxics
American Public Health Association
Asthma and Allergy Foundation of America
Association of Asthma Educators (PA)
Association of School Business Officials
International (ASBO International)
BBT Architects (CA)
Breast Cancer Prevention Partners
Californians for Pesticide Reform
Cancer Prevention Coalition for Los Angeles
(CA)
Center for Environmental Health
Child Care Aware of America
Children's Environmental Health Center of
the Hudson Valley
at New York Medical Center and Maria Farer
Children's Hospital (NY)
Children's Environmental Health Network
Children's Environmental Protection Alliance
(AL)
Clean and Healthy NY
Coalition for Environmentally Safe Schools
(MA)
Collaborative for High Performance Schools
CT Foundation for Environmentally
Safe Schools
The Deirdre Imus Environmental Health
Center at Hackensack UMC (NJ)
Earth Day Network
Education Law Center (NJ)

Empire State Consumer Project (NY)
First Focus
Green Schools National Network
Healthy Legacy (MN)
Health Resources in Action
Healthy Schools Caucus (OR)
Healthy Schools PA
Women for a Healthy Environment
Healthy Schools Network, Inc.
Improving Kids' Environment (IN)
Indoor Air Institute
IPM Institute of North America
Kids for Saving the Earth (MN)
Learning Disabilities Associations of America
Learning Disabilities Association of Arkansas
Learning Disabilities Association of Georgia
Learning Disabilities Association of Illinois
Learning Disabilities Association of Iowa
Learning Disabilities Association of Maine
Learning Disabilities Association of Maryland
Learning Disabilities Association of
Minnesota
Learning Disabilities Association of
Pennsylvania
Learning Disabilities Association of New
Jersey
Learning Disabilities Association of
Oklahoma
Learning Disabilities Association of South
Carolina

Learning Disabilities Association of
Tennessee
Learning Disabilities Association of Texas
Learning Disabilities Association of Utah
Maine PTA
Maryland Children's Environmental Health
Coalition
Massachusetts Coalition for Occupational
Safety and Health
Midwest Pesticide Action Center
National Association of School Nurses
National Center for Environmental Health
Strategies
Nontoxic Certified (NY)
Pesticide Action Network of North America
Occupational Health & Safety Section of the
American Public Health Association
Ohio Public Health Association
Parents for Students Safety (TN)
Partners for a Healthier Community (MA)
Pennsylvania Integrated Pest Management
Program
Pioneer Valley Asthma Coalition (MA)
Project Green Schools (MA)
Rachel Carson Council (MD)
Regional Asthma Management and
Prevention (CA)
Responsible Purchasing Network
School-Based Health Alliance
School Based Health Alliance of Arkansas
Selah Natural Medicine (MT)
Sheet Metal Occupational Health Institute
Trust Inc., (SMOHIT)
Sheet Metal Air Rail and Transportation
(SMART)
Sierra Club
South Texas Asthma Coalition
Toxics Information Project (RI)
Twenty-first Century Schools Fund (DC)
Valley Community Healthcare (CA)
Western New York Council on Occupational
Safety & Health
Zinner Consultants (CA)

Individuals (*organizational affiliations for informational purposes only*)

Rosemary Ahtuanguaruak, Nuiqsut (AK)
Elgin Avila, MPH, Esq., Health Solutions
Louis Allen, MD
David Hammond, MD, NW Passage (WI)
Gary Arthur, Issaquah Educ. Assoc. WA)
Carl R. Baum, MD, Yale School of Medicine
Pat Barnwell, University of TN/IPM Program
Gloria E. Barrera, MSN, RN (IL)
Carla C Campbell, MD, MS, FAAP, University of Texas at El Paso
Marie Chan, Fremont, VA
Richard Crime, Environmental Engineer (KY)
Evan A. Davis, (NY)
Mary Rothwell Davis (NY)
Sarah Evans, PhD, MPH, Icahn School of Medicine/Mt Sinai (CT)
Maida Galvez, MD, MPH, Mt Sinai (NYC)
Mary Gant, Green Science Policy Institute
Augusta Gross, PhD (NY)
Luz Guel, Mt Sinai, Brooklyn, NY
Chip Halverson, ND, Northwest Center for Biological Medicine (OR)
Miriam Heilbrun, MS, Brooklyn, NY
Brent Ibata, PhD, JD, MPH, FACHE (FL)
Tenaya Jackman, MPH (HI)
Senator Emanuel Jones, Ellenwood, GA
Jerry Lamping, Take Care of Your Classroom Air (TX)
Paul Landsbergis, PhD, MPH, SUNY Downstate Medical Center
Patricia A. Lasley, MPH, Great Lakes Center for Children's Environmental Health (IL)
Larry K. Lowry, Southwest Center for Pediatric Environmental Health (TX)
Daniel Lefkowitz (NY)
Virginia Mott (ME)
Christina Lorentz, MPH, Columbia University
Raffi M. Manjikian, IDS (MA)
Kristin Oliver, Ichan School of Medicine/Mt Sinai (NYC)
Larry K. Olsen, DrPH, MCHES, AT Still University (NM)
Jerome A. Paulson, MD, FAAP, Emeritus, George Washington University School of Public Health
Kim Poli, MD (NY)
Joseph Pones, PhD, Rutgers University
Jill Samuels, Montefiore, Bronx, NY
Chelsea Alexandra Schafer, California State University, Northridge
Alexandra W. Siniora (IL)
Lindsay Talon, PhD, Massachusetts College of Pharmacy and Health Sciences
Joan K. Teach, PhD (GA)
Patrick J Terkoski, NYSUT, Long Beach, NY
Mariana Torchia (CA)
Theodora Tsongas, PhD, MS (OR)
Jeff Vincent, PhD, UC Berkeley
Leon Vinci, DHA, Health Promotion Consultants (VA)
Yolanda Whyte, MD, Whyte Pediatrics, Atlanta, GA
Lauren Zajac, MD, MPH, FAAP, Icahn School of Medicine/Mt Sinai (NYC)

