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RE CLEAN AIR IN BUILDINGS CHALLENGE/SCHOOLS & CLEAN AIR CHECK LIST

March 21, 2022 – via email

US EPA Deputy Administrator Janet McCabe

cc US EPA OAR Deputy Assistant Administrator Alejandra Nunez

cc OAR: J Edwards, D Rowson, A Smith, T Enger

Dear Deputy Administrator McCabe:

Thank you and your staff again for a helpful and constructive meeting with you at EPA on Thursday, March 10, 2022. We only wish we had had more time for an in-depth dialog.

Ahead, we very much look forward to collaborating with you on the just announced Clean Air in Buildings Challenge and in working with you on how to recognize and benchmark IAQ successes. Our scores of organizational and hundreds of individual Coalition members are well-versed in EPA's past work on IAQ in schools and have long advocated for refreshing and expanding the extraordinarily successful IAQ TFS program which guided schools, districts, cities, states, and tribes on addressing indoor environments.

With this letter, we offer a few preliminary thoughts on the entire exciting Challenge, and we look forward to sharing more extensive and detailed comments in the near future.

First, congratulations! We want you to know we share EPA's excitement at the White House's recognition of the key role that ventilation, and more generally Indoor Air/Environmental Quality, plays in public health, and in keeping schools open and children and staff healthy during cold and flu season, and in the pandemic and its variants to come. It is the first White House to elevate ventilation/IAQ, a difficult and complex environment and public health concern. That said, the White House should not be allowed to believe that IAQ is a simple problem with simple fixes.

Second, we heartily agree we should all capitalize on this moment that is providing a significant new platform for health and environmental action for the EPA/OAR/Indoor Environments Division.

To make the most of this public health opportunity, we offer several points below about the Challenge and the Checklist, points we hope will be of interest to EPA and to the White House.

In no order they are:

- Children are not just little adults; schools are not just little offices.
- Be aware of the conditions of schools before you start. CDC is still not well-aware of the physical conditions of schools, making the job of communicating with schools harder for EPA. Indeed, most schools were unable to implement CDC's reopen guidance. Looking ahead, all of us, including EPA, need to do more to educate federal agencies on school environmental conditions and occupant characteristics.
- One opportunity to build knowledge and effective programs could be to authorize EPA/OAR/IED to establish a FACA to guide the development of its (and interagency) work around IAQ in schools. Failing

that, EPA might reinvigorate its school leadership team, including putting resources into regional office spin-offs.

- About schools today:
 - There are no two states alike in how they address school physical environments; in fact, about one-third offer no regular support for facility repairs or renovations. Numerous studies have documented that school buildings are in poor condition and those conditions such as poor IAQ, molds, dust and debris, heat, poor siting, proximity to hazards, and poor lighting and sanitation, can permanently damage children's health, thinking, and learning.
 - What is common across all jurisdictions is that local schools rely on local dollars. Thus, the poorest communities with the highest proportions of at-risk children (both COVID and climate) have the schools in the poorest conditions and facility staff with the fewest professional credentials and resources, and no access to outside consultants. Rural-remote schools also have challenges in finding and hiring experts, regardless of ARPA funding.
 - Today, 95% of school occupants are women and children and 40% of school age children have existing chronic health issues. Over half of all public-school children are of color; half of students are on subsidized meal programs. All are in buildings more densely occupied and cleaned less often than nursing homes.
 - Schools were never, and still are not, COVID-ready (ex., COVID quick fixes and useless IAQ measures). Considering Future Ed studies, the volume of self-reported spending on school HVAC is no guarantee of the quality of the work undertaken.
- About the Clean Air Challenge and Benchmarks
 - If the White House and EPA seek to “recognize” achievement in school or building IAQ, there will need to be concrete steps and measures, or benchmarks, that are clear, easy to follow, and accessible to parents and communities at the local and state level.
 - Education and training for parents and communities is critical to getting unaddressed needs attended to, as parents and community set de facto expectations for local schools. And they vote.
 - EPA could consider developing and administering a professional certification based on metrics and other benchmarks for ventilation/IAQ in schools. The challenge with all IAQ work in schools (or other settings) is that there are no public agency certifications for qualifying vendors/consultants in the field, and no facility or IAQ metrics in EPA's guidance. Understanding, acting effectively on, and evaluating IAQ remains exceedingly difficult and at times highly controversial.
- About the Checklist
 - It is a great idea, but only if it is credible and it works. Schools are not offices or nursing homes, and their purposes and occupants are significantly different from any other building type. The future health and success of the nation's children depends on IAQ in schools.
 - We find the published Checklist towards skewed to wealthier schools with mechanical air handling systems, perfect for consultants who can measure operating systems. We ask: what would a checklist for IAQ success look like for a northeastern U.S. 90-year-old classroom building with transoms over the doors and windows painted shut and no deep buffer between the bus stop and the front entrance? What about for a 1950's box in Arizona, or in the Gulf States hard hit by hurricanes?
 - We strongly recommend the current list be tailored and editions issued for specific building types, and that EPA update and redistribute its own extremely helpful checklists.
 - EPA also needs to update some of its back ground files on IAQ. For example, the factsheet on IAQ and children is dated 2012—hardly persuasive.
 - The Checklist calls for creating a “master plan.” This is easier said than done and would be especially burdensome on already under-staffed and resourced schools. A template master plan, with guidance starting with how to structure a facility committee, and funding, would be a great first phase in a competitive EPA grants program in which the second phase is prioritized repairs and other implementations. EPA must outline the steps, from assessing the facility exterior and interiors, to setting up and prioritizing major renovations and a how to engage community stakeholders.
 - DIY air cleaners should be a footnote, not an option, in EPA guidance, and not presented as a permanent fix. “Temporary” portables have lingered and rotted in schoolyards for decades. We

agree however that low-resource schools need as many options as possible, but clearly, DIY fans are not at all what the poorest children deserve.

- Credibility across the agencies. Federal agencies need to synchronize their efforts around schools where roughly 20% of the total US population spends its work days. NIH says masks should be worn in schools; whereas current CDC guidance says masks do not need to be mandated. Simultaneously, EPA recommends addressing air quality. Everyone's credibility is at stake.
- Coordination from the White House and the CEQ is critical to rebuilding credibility with the public and driving actions to keep schools open and safe for students during the ongoing COVID-19 pandemic, now and in the future.
- Sustainable funding to support attention to ventilation/IAQ efforts in schools is the most critical issue and must be addressed. WE do not believe that ARPA funding for local schools and states will be sufficient to support the ongoing efforts to upgrade and maintain facility operating systems in the long-term.

Thank you again for your time and a helpful meeting.

We stand ready to work with EPA to advance ventilation and IAQ in the short-term and will continue to push for the longer-term permanent EPA programs needed to address the damaging lack of healthful indoor and outdoor learning environments for all children.

Sincerely,

Asthma and Allergy Foundation of America
Break the Cycle of Health Disparities (GA)
Collaborative for High Performance Schools
Children's Environmental Health Network
First Focus on Children
Healthy Schools Caucus
Healthy Schools Network
Maryland Children's Environmental Health Coalition
Project Green Schools
Women for a Healthy Environment (PA)

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