



Miguel A. Cardona, Secretary
U.S. Department of Education
400 Maryland Avenue SW
Room 3W113
Washington, DC 20202

May 24, 2021

**RE: American Rescue Plan Act Elementary and Secondary School Emergency Relief Fund.
Federal Register Number: 2021-08359**

Dear Secretary Cardona:

On behalf of the Asthma and Allergy Foundation of America (AAFA), the leading patient organization advocating for people with asthma and allergies and the oldest asthma and allergy patient group in the world, I am writing to provide comments on the Interim Final Rule on the American Rescue Plan Act Elementary and Secondary School Emergency Relief (ARP ESSR) Fund.

The ARP Act provides a total of nearly \$122 billion via the ARP ESSER Fund to State educational agencies (SEAs) and local educational agencies (LEAs) to help schools return safely to in-person instruction, maximize in-person instructional time, sustain the safe operation of schools, and address the academic, social, emotional, and mental health impacts of the COVID-19 pandemic on the Nation's students. We applaud the agency for laying out a number of requirements in the interim final requirements to promote accountability, transparency, and the effective use of funds by requiring stakeholder consultation, planning, and public input.

Maintaining healthy facilities and improving ventilation are one permitted use of ARPA funds. Because of the crucial importance of healthy school air not only with regard to COVID but also for the millions of American children with asthma, we are writing to urge you to highlight the importance of indoor air quality in the final ARP requirements and provide further information to states and LEAs to encourage thoughtful investment of ARPA funds in this area.

Improvements in Indoor Air Quality Under ARPA

Section 2001(i)(1) of the ARP Act requires each LEA that receives ARP ESSER funds to develop and make publicly available on the LEA's website, not later than 30 days after receiving ARP ESSER funds, a plan for the safe return to in-person instruction and continuity of services for all schools, including those that have already returned to in-person instruction.

Importantly, the requirement clarifies that an LEA's plan must describe how it will maintain the health and safety of students, educators, and other school and LEA staff by, among other things, cleaning and maintaining healthy facilities and improving ventilation.



As you know, the ARPA includes a number of eligible uses for which the money may be spent, including:

“Inspection, testing, maintenance, repair, replacement, and upgrade projects to improve the indoor air quality in school facilities, including mechanical and non-mechanical heating, ventilation, and air conditioning systems, filtering, purification and other air cleaning, fans, control systems, and window and door repair and replacement.”

The law does not specify how much of the money should be spent for this purpose; it is included among a long list of eligible activities.

The importance of Indoor Air Quality in Schools

AAFA believes that the Department of Education should play a leading role in helping to inform schools and school districts about the importance of making a significant investment to improve clean air in schools.

Since children spend most of their time outside their homes and within the school environment, school indoor air quality can directly influence their respiratory health. According to the Environmental Protection Agency (EPA), approximately 53 million children and 6 million adults in the United States spend a large portion of their days in schools.¹ Research links key environmental factors to health outcomes and students’ ability to perform. Improvements in school environmental quality can enhance academic performance, as well as teacher and staff productivity and retention.

Specifically, poor indoor air quality can be a severe health concern for those with asthma and allergies and increases the risks of severe asthma attacks and allergic reactions.² Nearly 1 in 13 school-aged children have asthma, which is the leading cause of school absenteeism due to chronic illness. There is substantial evidence that indoor environmental exposure to allergens (such as dust mites, pests, and molds) plays a significant role in triggering asthma symptoms. These allergens are common in schools.³ Other factors that contribute to poor indoor air quality in schools include:

- **Poor Ventilation & HVAC Systems** - Inadequate ventilation results in high levels of harmful airborne particulates and carbon dioxide levels. It also leads to mold and bacteria growth.
- **Ageing Buildings** – The structure of many schools have not been updated for decades. As a result, many schools have problems with leaks, water damage and excessive moisture –

¹ Environmental Protection Agency. Indoor Air: Improve Indoor Air Quality in Schools. http://www.epa.gov/airquality/community/details/i-schools_addl_info.html

² Environmental Protection Agency. Questions about your Community: Indoor Air. <http://www.epa.gov/region1/communities/indoorair.html>

³ Environmental Protection Agency, About IAQ Schools. <https://www.epa.gov/iaq-schools/about-iaq-schools>



which lead to dust, mold and other airborne allergens that contribute to poor indoor air quality.

- **Schools Located Near Sources of Pollution** – Schools that are located in busy cities or near highways face significant fumes from exhaust and gases like carbon monoxide.

We respectfully request that the Department of Education:

1. Require LEAs' plans to include a specific description of current ventilation systems and air quality in school facilities and discuss how proposed activities will address any gaps;
2. Recommend that a minimal "floor" of funding be dedicated to improving the indoor air quality in schools for those LEAs that identify gaps in their ventilation systems and air quality; and
3. In consultation with CDC, provide specific information, guidance and educational materials to SEAs and LEAs about the importance of clean air in schools, immediately and on an ongoing basis.

AAFA would welcome an opportunity to talk further with you about how we might encourage schools and school systems to prioritize clean air in schools.

Sincerely,

Kenneth Mendez
President and Chief Executive Officer
Asthma and Allergy Foundation of America