



Asthma and Allergy
Foundation of America

April 27, 2021

International Mechanical Code Committee
c/o Mike Pfeiffer
International Code Council
500 New Jersey Avenue, NW 6th Floor
Washington, DC 20001

Re: International Mechanical Code 2021 Group A Committee Action Hearings

Dear International Mechanical Code Committee Members:

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 strongly endorse two proposed updates to the International Mechanical Code that will improve indoor air quality, greatly improving the health and safety of occupants.

Indoor air quality has long been a concern for our organization because of the 25 million children and adults in America living with asthma. Asthma costs an estimated \$82 billion per year in medical and nonmedical expenses. It is the most common chronic disease among American children, the leading cause of child hospitalizations, and one of the main reasons for missed school days. Deep racial and ethnic disparities in asthma persist, with people of color experiencing an outsize burden of illness, hospitalizations and deaths.

Asthma can be triggered by a range of factors in an indoor setting, including mold, tobacco smoke, dust mites, and other allergens and irritants. While eliminating asthma triggers is a priority in all indoor settings, AAFA has had a long-term focus on indoor air quality in schools. Our Honor Roll report, which tracks a variety of state policies related to asthma and allergy management in schools, has found significant variation in whether and how states mandate various indoor air quality measures for school buildings. Unfortunately, this means that many children are learning in places that actually make their chronic health condition worse.

AAFA strongly supports the proposed updates to the IMC that will provide clear guidelines to help improve indoor air quality. Specifically, we support the Clean Air Ready (M2521) proposal, which will require mechanical systems to accommodate a MERV13 filter and require the electrical infrastructure necessary for clean air delivery. We also support the Demand Control Ventilation (M26-21) proposal, which will require occupiable spaces to have CO2 sensors to help monitor for adequate ventilation, as well as ventilation systems that satisfy outdoor air thresholds.

As the COVID-19 pandemic has underscored, indoor air quality and ventilation are also crucial factors in the spread of infectious disease. As society returns to higher levels of in-person school attendance, on-location work, and attendance in other settings for worship, entertainment, and



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other activities, we are seeing an unprecedented interest in making those spaces safe. We are heartened that investments in aligning buildings with the proposed IMC updates will result not only in lower COVID-19 risk but also in a safer and healthier indoor environment for children and adults with asthma and other respiratory diseases.

Thank you very much for your time and attention.

Sincerely,

A handwritten signature in black ink that reads 'Kenneth Mendez'. The signature is written in a cursive, flowing style.

Kenneth Mendez
President & CEO
Asthma and Allergy Foundation of America