

HEALTHY SCHOOLS NETWORK, INC.

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November 30, 2020 - via email

President-Elect Joseph Biden Vice President-Elect Kamala Harris Biden Headquarters, The Queen Theater Wilmington, DE 19801 cc US EPA Team Lead Patrice Simms; Team Member Alejandra Nunez

cc CEQ Team Nikki Buffa

Re: COVID, CLIMATE, CHILDREN AND SCHOOLS Call for US EPA to Step Up to Improve and Promote School Environments to Ensure Children's Health and Learning

Dear President Elect Biden and Vice-President Elect Harris:

Congratulations to you both and to your campaign. We look forward to working with your administration to improve and promote school and child care facilities and children's health. EPA has been actively been engaged, but poorly supported, in this since the mid-1990's, under its Clean Air Act authorization.

We are writing on behalf of ourselves and our twenty-two (22) organizational co-sponsors of the attached call to action to **request a meeting with your EPA team** to discuss the issues and the deep need for quick and strategic actions.

As you know, the pandemic has laid bare many disparities, but perhaps none so critical as the lack of preparedness and lack of resiliency of schools to COVID and to climate disasters. Importantly for reopening amid an ongoing airborne pandemic, that includes lack of ventilation and poor indoor air/environmental quality in schools. The EPA Team can also help ensure that efforts to rebuild better schools are also addressed, per the attached memo.

Thank you for your consideration. We look forward to a discussion in the near future.

Claire L. Barnett, MBA, Executive Director Saratoga Springs, NY

Succar J. Stocker

Susan Goekler, PhD, Board President Rehoboth Beach, DE

... for children ... health ... environment ... education ... communities ... since 1995 ...



Parents for Students Safety (TN)

Healthy Schools Caucus

Ouality First EHS. Inc.

COVID, Climate, Children, and Schools Urgent Actions to Keep School Children Safe and Rebuild Healthy and Resilient School Infrastructure

The Call for US EPA to Improve and Promote School Environments To Ensure Children's Health and Learning

November 30, 2020

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COVID, Climate, Children, and Schools: the perfect storm

Urgent Actions Needed to Keep School Children Safe

Rebuild Healthy and Resilient School Infrastructure

Call for US EPA to Improve and Promote School Environments to Ensure Children's Health and Learning

This policy paper urges four specific actions, further defined below:

- 1- Annual \$1/Child (\$65M) US EPA Healthy Schools/Healthy Children education and training grants Initiative to help prevent or resolve facility environmental health problems
- 2- Annual \$10M joint EPA and CDC grants program to protect, track and report on children's environmental risks and exposures in these settings
- 3- \$20B/2 years in federal emergency COVID funds for schools and child care facilities enrolling the poorest children to improve facility ventilation and sanitation
- 4- \$100B/10 years Rebuild America's Schools Act of 2019, reintroduced with new priorities and requirements on climate and COVID resiliency and mitigation

Before the pandemic, there were 56M children in our nation's 130,000 public and private schools, including 7M children in special education, and over 4M teachers, and an estimated 10-12M children¹ in an array of outof-home child care and early education facilities. Multiple studies over 30 years have shown that the children of color learn in facilities or classrooms in the worst conditions, including **poor ventilation; poor sanitation and plumbing; overcrowding; legacy toxics such as lead, asbestos, and PCBs; windowless closets; and poor siting and repair,** exposing them to multiple environmental hazards. While less data is available on the physical conditions of child care settings, many of the same health risks have been reported.² Not only do these hazardous conditions impact the health and safety of all children, they put millions of school and child care staff, some over age 60, at risk too.

Children are more highly exposed and vulnerable to environmental health hazards compared to other age groups due to a variety of physiological and behavioral factors.^{1, 3, 4, 5} While all children are uniquely vulnerable to environmental exposures, children living in under-resourced, minority communities are at even higher risk ^{5, 6} and their communities are also disproportionally impacted by the increases in extreme weather events.⁷

See Endnotes

Children are not little adults and schools are not little offices. School and child care facilities are more densely occupied than nursing homes, and their occupants are chiefly women and children. Yet these facilities serving America's children and youth are not required to have infection prevention and control plans or to maintain healthful indoor environments, yet healthful learning environments are well-documented to promote better attendance, behavior, and test scores. ^{8, 9, 10, 11, 12} While every state requires children to attend school, there is no formal environmental public health program in place that responds to, tracks, or reports on environmental impacts on children's health in these settings, and there is little oversight of school facilities. Consequently, these hazards can go undetected or ignored with little or no accountability.^{13, 14, 15, 16}

The virus cannot stop at the schoolhouse door. SARS-CoV-2, the virus that causes COVID-19, can be transmitted through close contact with an infected person or contact with contaminated surfaces; but recent research has found it is transmitted primarily from the aerosolized viral particles lingering in indoor air. Both children and adults can carry the virus, shed it, have no symptoms, and infect others.

The Perfect Storm

Today, both the pandemic and extreme weather events have amply demonstrated that school facilities in the U.S. are not prepared for COVID and not resilient to weather disasters, and that research on children's environmental health must be stronger. Worse, the Black, Latinx, and Native American communities hardest hit by COVID-19, often must send their children to the poorest schools in the worst condition, schools that are the least prepared for and least able to cope with or to recover from COVID and weather disasters.

OPPORTUNITY FOR BIDEN ADMINISTRATION

Schools serve multiple functions in children's lives. They need to stay open for the economy to fully reopen. The pandemic has laid bare the gross inequities in the health and education of children in communities of color and highlighted the lack of long-promised school infrastructure funding. These factors disadvantage the poorest children and hamper resource-poor schools from becoming climate-ready at a time when there are more natural disasters impacting schools. Therefore, Healthy Schools Network and its NGO partners are advancing this urgent Biden Administration Plan of Action for COVID, CLIMATE, CHILDREN and SCHOOLS.

URGENT ACTIONS

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• US EPA \$1/Child Healthy Schools/Healthy Children national grants initiative

• **Establish a permanent \$65M** Healthy Schools/Healthy Children Initiative (\$1/child enrolled in school and licensed child care, over EPA current FY) at US EPA that will sponsor annual grantee symposia and provide education and training grants to states and cities, tribal nations, communities, nonprofits and universities to advance smart decisions by schools and child care facilities on best uses of public construction funds.

- Grants should advance best practices in prevention, identification and resolution of environmental health hazards in school/child care buildings and grounds related to fresh air/ventilation and sanitation, including but not limited to: indoor air, chemical management, molds, cleaning, lead, PCBs, mercury, pests and pesticides, asbestos, airborne fiberglass and silica dust, siting and inspections. EPA guidance and grants should also promote how these settings can be climate resilient and mitigate impacts while enhancing indoor air/environmental quality.

- EPA office: led by Office of Air and Radiation/Indoor Environments Division, with offices of Chemical Safety, Water Quality, Environmental Justice, and Research. Also support:

- Water Infrastructure Improvements for the Nation (WIIN) Safe Drinking Water Grants to test at the tap for lead in schools and child care facilities
- Diesel Emission Reduction Act (DERA) and Schools Bus Rebate Program funding, with a priority on vehicle electrification
- Establish environmental public health system for children at risk or with suspected exposures at school or child care
 - \$10M joint federal US EPA with CDC/Agency for Toxic Substances and Disease Registry (ATSDR) effort to develop and fund model Environmental Health systems in states/cities/tribal nations to protect children at risk or with exposures in educational settings; such model systems to include new infection prevention and control plans for schools. Led by US EPA/Office of Children's Health Protection (OCHP), to continue work seeded under the Energy Independence and Security Act of 2007.

• Emergency funds to improve school/child care facility ventilation and sanitation

• **\$20B/two years**. COVID-specific: emergency federal funds for states, cities, and tribal nations to address ventilation and sanitary conditions in schools as a core part of new required and state-specific infection prevention and control plans. States shall assist and ensure that local schools measure (CO, Co2) and improve ventilation in all classroom facilities, consistent with US EPA Indoor Air Quality and the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) best practices.

• Federal funds to rebuild better school infrastructure

• **\$100B/10 years** to re-build better school buildings: reintroduce an updated Rebuild America's Schools Act of 2019 (RASA) with explicit priorities on Indoor Air, and Climate Resiliency and Mitigation. States should require schools to have adequate ventilation and filtration of air, including monitor air for carbon monoxide (CO) and carbon dioxide (CO2); to have adopted written plans to reduce legacy toxics from buildings and grounds; to have at least one operable window in all classrooms, as feasible; to have stringent environmental site assessments for all new construction; to encourage green infrastructure and outdoor classrooms; and to adopt hard-wired internet access.

SUMMARY

Children are 100% of our future. Schools and child care are critical to their educational, social, and emotional development, and to our future as a nation. Schools and child care are also critical to working families every day in every community. It is therefore imperative that the schools and child care facilities our children attend be environmentally safe and not present risks of acute and chronic illnesses.

We urge the Biden Administration and its Transition Team to make healthy schools and healthy children a priority of the new administration.

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ENDNOTES

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