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Coalition *for* Healthier Schools

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

Coordinated by Healthy Schools Network

September 8, 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:

**Congress Must Fund US EPA to Push CLEAN AIR in Schools:
1,000 Schools Closed in 35 States Due to COVID-19
Children's Hospitals Raise New Alarms
*Severe Storms Cause More School Closures***

Dear Majority Leader Schumer and Speaker Pelosi:

Schools must be both pandemic and climate ready and today they are neither. This week, 1,000 schools are closed in 35 states due to COVID and the nation has recorded over 40M COVID cases. Extreme weather events in the west and the Gulf states up to New England are resulting in more schools closed. Last month, the nation's children's hospitals called on citizens to "protect our children" from COVID (NY Times Aug 30th). We agree and add that schools and child care facilities must also be responsible to children by implementing CDC's recommendation to provide healthful indoor air in an airborne pandemic (CDC May 7th).

We, the undersigned 93 organizations and 59 individuals, write to urge reconciliation/ budget act funding for US EPA to help address the unacceptable 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 new funding for its education and training outreach programs on indoor air and ventilation in schools and child care facilities.

\$1/child enrolled in schools and in child care is \$65M, an insignificant amount in the proposed budget reconciliation that would result in a \$65M annual add to US EPA over FY 21 to address school and child care facility environments. **Another \$10M** is needed by US EPA to expand Pediatric Environmental Health consultancy services nationwide.

More school closures v better indoor air. 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 **\$75M over FY 21 be allocated annually to US EPA:**

- **\$1/child enrolled in schools and in child care. \$65 Million to EPA's Office of Air and Radiation/Indoor Environments Division's** to restore and expand its Reducing the Risks of Indoor Air program, including providing national, state, tribal and regional grants; hosting annual convenings of grantees and school/childcare personnel with EPA federal and regional staff; updating guidance and publications on indoor environments, climate resiliency and mitigation, and occupant health; issuing new guidance on climate disasters, resiliency, and mitigation for schools in urban and rural-remote settings; and leading CDC and Education in developing cross-agency work to develop infection prevention and control plans for these settings, and in addressing children's environmental exposures.
- **\$10 Million to its Office of Children's Health Protection** to restore and expand pediatric environmental health assistance and research, including how environmental health experts can assist agencies with onsite assessments of hazards. 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 ten years to help states, tribes, and 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 mechanical building 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 Patrick Leahy, Chair, Senate Appropriations Committee
Senator Tom Carper, Chair, Senate Environment and Public Works Committee
Representative Rosa DeLauro, Chair, House Appropriations Committee
Representative Frank Pallone, Chair, House Energy and Commerce Committee

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Sincerely,

Alaska Community Action on Toxics
Alliance of Nurses for Healthy Environments
American Public Health Association
American School 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)
Cool Green Schools (MD)
Earth Day Network
Education Law Center (NJ)
Empire State Consumer Project (NY)
First Focus
Great Neck Breast Cancer Coalition (NY)
Green Schools National Network
Hawaii Public Health Association

Healthy Legacy (MN)
Health Resources in Action
Healthy Schools Caucus (OR)
Healthy Schools PA
Healthy Schools Network, Inc.
Hunton Group, Houston, TX
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
Massachusetts Facility Administrators Association
Midwest Pesticide Action Center
National Association of School Nurses
National Center for Environmental Health Strategies
New Jersey Work Environment Council (WEC)
New York State American Academy of Pediatrics, Chapters 1, 2 & 3
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
St. Peter's Health Partners (NYS)
San Francisco Bay Physicians for Social Responsibility (CA)
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
Women for a Healthy Environment (PA)
Women's Voices for the Earth (MT)
Zinner Consultants (CA)

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