

Testimony Letter to US Senate Appropriations Committee: Subcommittee on Interior, Environment and Related Agencies

Submitted by: Healthy Schools Network, on behalf of 63 partners in healthy schools advocacy

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Testimony. We urge you to allocate \$110 million to the US Environmental Protection Agency's (EPA) FY 23 budget, including \$100 million for the Office of Air and Radiation/Indoor Environments Division to fulfill the Clean Air in Buildings Challenge outlined by the White House in March 2022, to help school buildings become healthier and to advance school pandemic and climate-resiliency; and, \$10 million for EPA's Office of Children's Health Protection to increase environmental public health services for children in K-12 schools and child care facilities as well as research.

Schools must be able to stay open and reopen quickly and safely. Education is a social determinant of health, for children's long-term health, development, and safety, and for the economy to stay open. Yet, with over 8 billion square feet of learning space nationwide, valued at over \$3 trillion, schools are neither resilient to weather extremes, nor are they even fully pandemic-ready.

- Children are not just little adults: they are uniquely vulnerable to environmental health hazards (EPA, CDC, NIEHS); and,
- Schools are not little offices: they are used more hours/day and days per week than offices and more densely occupied than nursing homes and 95% of the occupants are women and children (NCES).

Today, some 40% of school age children have existing chronic health issues (CDC). But despite facilities' clear impacts on the economy and on children, numerous studies have documented that school buildings are in poor condition and those conditions such as polluted Indoor Air Quality (IAQ), molds, dust and debris, high heat, poor siting, proximity to hazards, and poor lighting and sanitation, can permanently damage children's "health, thinking, and learning" (Harvard SPH 2017; NRC 2006). Schools that institute good environmental control measures can decrease population exposures to allergens and irritants which can then lead to decreased allergy and asthma symptoms.

There are no two states alike in addressing school buildings and grounds. But what is common is that local schools rely on local dollars, thus, the poorest communities with the highest proportions of at-risk children (poverty, COVID, extreme weather) 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 big challenges in finding and affording outside consultants.

EPA's proven guidance on school and child care facilities and two decades of work with the K-12 communities are key assets to expand on. Years of published research has shown that indoor environmental exposure to pollutants can be more intense than outdoor exposures and that school facilities have been neglected for decades. Poor indoor environment result in decreased seat time, attendance, and test scores, and increase asthma and other health events, and thus increase health costs. There is clearly a significant need to educate, train, and encourage schools and childcare facilities on child-safe and effective preventive management of facilities. EPA has the existing authorizations and programs to conduct this work.

\$110 Million in FY 23 for EPA's long leadership on IAQ and related work on indoor environments is authorized under several statutes cited below. We urge that over half of the \$110 million for US EPA be allocated to national cooperative agreements and regional grants to states, tribes, cities, universities, NGOs, to provide outreach, training, and technical assistance to assist school communities improve, monitor, and benchmark improvements to indoor environments in schools and child care facilities, consistent with the President's [Clean Air in Buildings Challenge](#) to combat the airborne pandemic. Some funds should also be used by EPA/OAR directly to establish a national Clean Air in School Buildings public information campaign.

Authorizations. The primary statutory authorities EPA relies on for the indoor air program are: the Superfund Amendments and Reauthorization Act (SARA) Title IV – Radon Gas and Indoor Air Quality Research Act; the Toxic Substances Control Act (TSCA) Title III – Indoor Radon Abatement Act of 1988, and TSCA Title V, Healthy High Performance Schools Act; the Clean Air Act (CAA), §103(a, b, c); and additional statutes related to indoor air such as CERCLA and FIFRA.

Recommended funding for EPA in FY 23:

EPA/OAR/Indoor Environments Division (\$100M) to include:

- \$65M to deliver Clean Air Programs on the ground: grants to states/tribes, cities, universities, and NGOs, via national cooperative agreements and regional grants to advance education, and training to schools/child cares, personnel, parents, and communities; technical assistance and monitoring/measuring of IAQ elements; annual conference for grantees and other key stakeholders.
- \$5M for an EPA-led National Public Information Campaign to activate the White House Clean Air Challenge, focused on clean air in schools/childcare, congregate settings, and other buildings: consultants for planning, materials, video, paid/un paid placements.
- \$1M to host a Federal Advisory Committee to help EPA address the complex state, tribal and local issues of school Indoor Air Quality (IAQ), and including ED, CDC, Energy, FEMA.
- \$3M for EPA Regional offices' stakeholder meetings and conferences.
- \$1M to update EPA Indoor Air Quality Tools for Schools (*IAQTS*) voluntary program including guidance on pandemic/epidemic readiness and climate resiliency and mitigation, benchmarks for the Clean Air Challenge and the detailed guidance on Clean Air Master Plans.
- \$10M Research: Climate and Indoor Environments: how warming climate is impacting indoor environments and human health, including two pull out sections: 1- on impacts on children, and 2- impacts on indoor learning environments, and recommendations on steps to protect health and learning; Legacy Toxics in Schools: research to assess scope and measures of risks and exposures in schools to legacy toxics such as lead, radon, asbestos, mercury, PCBs and pesticides/disinfectants, as well as stores of instructional laboratory, maintenance, and garage supplies, and recommendations on reducing risks; School Design and Construction: science-based recommendations for school and child care facility design elements, construction, and operations, with goals to promote student health, thinking, and learning, ease of maintenance, pandemic readiness, and, climate resiliency and mitigation.
- \$15M Federal EPA/CDC/ED Guidance to Assist States/Tribes/Cities/Districts: create and disseminate: Model Infection Prevention and Control Policies for schools to adopt, in cooperation with state and local health agencies, driving clean air, clean water, and clean school buildings; model State/Tribal tracking system on school facility environmental conditions; model State/Tribal/City tracking and reporting on children's environmental and physical health and safety in schools and child care

- \$10M US EPA/OCHP: Office of Children’s Health Protection to restore investment in Centers of Excellence in Children’s Environmental Health (co-funded with NIEHS), research on children’s risks and exposures in school and child care facilities, co-chair Task Force on children’s environmental health (EO 13045), expand pediatric environmental health services.

Thank you for your consideration. We recognize that there are many priorities facing your subcommittee, but none as crucial as enhancing the health, ability to learn, and safety of the nation’s children. We hope that you will fully support these small but nationally impactful programs that will result in healthier children and far better educational outcomes.

National Organizations:

21st Century Schools Fund
 Allergy & Asthma Network
 American Academy of Allergy, Asthma & Immunology
 American Federation of Teachers
 American School Health Association
 APHA Occupational Health Section
 Asian Pacific Islander Women's Forum
 Asthma and Allergy Foundation of America
 BlueGreen Alliance
 Center for Environmental Health
 Children's Environmental Health Network
 Coalition for Environmentally Safe Communities
 Collaborative for High Performance Schools
 Earth Day.org
 Environmental Working Group
 First Focus Campaign for Children
 Green & Healthy Homes Initiative, Inc
 Health Promotion Consultants
 Healthy Schools Network
 IPM Institute of North America
 MGH Innovative One Health Solutions
 National Association of School Nurses
 National Association of State Boards of Education
 National Center for Healthy Housing
 National Coalition for Healthier Schools
 National Environmental Health Association
 National Healthy Schools Caucus
 Pesticide Action Network
 Quality First EHS, Inc.
 Rachel Carson Council
 Responsible Purchasing Network
 Society of State Leaders of Health and Physical Education
 Until Justice Data Partners
 Women's Voices for the Earth

State Organizations:

Air Balancing Service Co, CT
Alaska Community Action on Toxics, AK
American Nurses Association- New York (ANA-NY), NY
Center for Professional Academic Consulting, DC
ConnectiCOSH, CT
Connecticut Advanced Practice Registered Nurse Society, CT
Connecticut AFL-CIO, CT
Connecticut Education Association, CT
Connecticut Nurses Association, CT
ConnFESS, CT
Cypress-Fairbanks ISD, TX
Dr. Yolanda Whyte Pediatrics, GA
Florida Clinicians for Climate Action, FL
HARAMBEE House Inc., GA
Healthy Schools Now- NJ WEC, NJ
Informed Green Solutions Inc., VT
LEW Environmental Services LLC, NJ
Maryland Children's Environmental Health Coalition (MD CEHC), MD
Massachusetts Coalition for Occupational Safety and Health, MA
New Jersey Association of Designated Persons, NJ
NJ Work Environment Council, NJ
New York State Parent Teacher Association (NYS PTA), NY
Quattrocchi Kwok Architects, CA
Regional Asthma Management and Prevention, CA
San Francisco Bay Physicians for Social Responsibility, CA
Selah Natural Medicine Portland, OR and Kalispell Mt., OR and MT
South Texas Asthma Coalition, TX
Take Care of Your Classroom Air, TX
Women for a Healthy Environment, PA