

Letter to US EPA Funding Urgently Needed for Clean Air and Healthy Schools

December 21, 2022

The Honorable Michael Regan, Administrator
US Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20005

Dear Administrator Regan:

The undersigned eighty-nine organizations urge you include \$100 million for the US Environmental Protection Agency's (EPA) Office of Air and Radiation in the Administration's FY 2024 budget request to protect school children and personnel from unhealthy environments in schools and childcare facilities, and to fulfill the Clean Air in Buildings Challenge announced by the White House in March 2022. We also urge that you include \$10 million in the FY 2024 budget to restore the capacity of EPA's Office of Children's Health Protection to stimulate research and provide environmental public health expert consultations on children's health to state and local agencies.

The Administration's previous budget requests have been woefully inadequate to support a meaningful federal response to poor indoor air quality, lead contamination, other legacy toxics, and a range of potential environmental threats plaguing schools and child care facilities.

School environmental health is an urgent need that demands a federal response:

- School attendance is mandatory in all states, and 98% of US children are in school every day.
- CDC reports that 40% of all school-age children have chronic health conditions.
- Nearly half of all public-school students are children and youth of color.
- Schools have an exceptionally long history of poor indoor air/environmental quality worsened by decades of funding shortages, neglect, and a lack of knowledge on how to address problems effectively.
- The poorest communities hardest hit by COVID, and climate change are also the communities where children's health and learning are impacted by the worst conditions.
- An estimated 50 percent of public schools have outdated heating and ventilation systems, and thousands of schools likely contain PCBs and asbestos, among other risks posed by poorly managed chemicals and pesticides used in and near school buildings.
- Further, the nation's 100,000 public schools today are neither climate-ready nor pandemic-ready even though they contain over 8 billion square feet of learning space valued at over \$3 trillion, which means more frequent long-term school closures ahead.

This is the Administration's moment to put the EPA's 30 years of expertise in indoor air and indoor environments to work to improve school buildings and grounds and thus the health and learning outcomes for children, especially for those most disadvantaged, including children with disabilities.

Education is a social determinant of health. Schools must be able to stay open and provide a safe environment to ensure healthy futures for children. During the school year, about fifty million children in the US spend the majority of their waking hours when not at home in public schools. Numerous studies have documented that school conditions such as polluted Indoor Air Quality (IAQ), mold, dust and debris, high heat, poor siting, proximity to hazards, noise, and poor lighting and sanitation, can damage children's "health, thinking, and learning" (Harvard SPH 2017; NRC 2006). Today, some 40% of school age children have existing chronic health issues according to the Center for Disease Control and Prevention (CDC), including asthma, which affects 1 in 13 school-aged children and remains the leading cause of school absenteeism due to chronic illness.

We laud the Administration's efforts to make available funding for school infrastructure through the various COVID programs, ARPA, BIL, and IRA, however EPA is slated to receive only a slight increase of \$50 million spread over 10 years for addressing polluted air in schools. While the Department of Energy (DOE), Department of Education (ED), and CDC have far larger programs, none match EPA's knowledge and experience on the physical environment of schools and its impact on children. EPA's Indoor Environments Division must have the resources to fully participate in federal efforts. To date, EPA's level of funding is embarrassingly far from sufficient considering the state of environmental health and documented environmental problems in schools, and the lack of knowledge in communities and among local education leaders on how to address those issues.

EPA's indoor air program has proven expertise, experience, and connections to help schools by providing tools, education, and training to the education field and to help schools and childcare facilities institute and invest in child-safe and preventive management practices. Unfortunately, EPA's indoor air program has received only a tiny fraction of the funding needed for on-the-ground support to schools.

Of the \$100 million annual funding that we recommend for EPA's indoor air program to improve school indoor air and related issues, we urge that half be provided through cooperative agreements to states, tribes, cities, and nongovernmental organizations to provide "hands-on" technical assistance to schools, training, educational outreach, and programs to monitor and assess school environmental health conditions. State capacity to help schools varies significantly, and EPA funding and guidance can help track and improve conditions for schools nationwide, with special attention to schools in poor and disadvantaged districts and communities of color, as well as rural-remote schools. We also recommend funding be directed to immediately activate the White House Clean Air Challenge focused on schools/childcare facilities.

In addition, we urge EPA to increase by \$10 million annually the funding provided to EPA's Office of Children's Health Protection. This funding should be used to restore investments in research and outreach programs for children's environmental health shared with the CDC, the National Institute of Environmental Health Sciences, and the Agency for Toxic Substances and Disease Registry. This funding will also help EPA in its role as co-chair of the multi-agency President's Task Force on risks to children's environmental health (under Executive Order 13045), and to elevate its critical role in a new interagency group on schools facilities that includes EPA, ED, DoE, plus offices in the White House, including the Council on Environmental Quality and Domestic Policy Council.

This is the Administration's moment to put EPA's proven expertise to work to improve health and learning outcomes for children, especially those most disadvantaged or with disabilities.

We request an opportunity to meet with you at your earliest convenience to discuss in greater detail the funding needs for school environmental health, the hands-on expertise needed, and ways to promote healthier schools and healthier children nationwide.

Thank you for your consideration of our request.

Sincerely,

National Organizations

21st Century Schools Fund
AASA, The School Superintendents Association
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
Coalition for Healthier Schools
Coalition of National Health Education Organizations
Collaborative for High Performance Schools
Coming Clean
Earth Day.org
Environmental Working Group
First Focus Campaign for Children
Green & Healthy Homes Initiative, Inc
Green Building Alliance
Health Promotion Consultants
Healthy Schools Network
IPM Institute of North America
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
PCBSinSchools
Pediatric Environmental Health Specialty Unit/Region 4
Pesticide Action Network
Project Green Schools
Quality First EHS, Inc.
Rachel Carson Council

reduceCO2.us
Responsible Purchasing Network
Sciencecorps
Society of State Leaders of Health and Physical Education
Until Justice Data Partners
Women's Voices for the Earth
UndauntedK12

State Organizations

7 Directions of Service, NC
AFSCME Council 4, CT
Air Balancing Service Co., CT
Alaska Community Action on Toxics, AK
American Nurses Association- New York (ANA-NY) NY
Asthma Alliance of North Carolina
Center for Professional Academic Consulting, DC
ConnectiCOSH, CT
Connecticut Advanced Practice Registered Nurse Society, CT
Connecticut AFL-CIO, CT
Connecticut Coalition for Economic and Environmental Justice
Connecticut Education Association, CT
Connecticut Nurses Association, CT
ConnFESS, CT
Connecticut Roundtable on Climate and Jobs
Connecticut State Building Trades Council
CSEA SEIU Local 2001, CT
Cypress-Fairbanks ISD, TX
Drumlins End Farms, NY
Florida Clinicians for Climate Action, FL
Foundation for Fair Contracting of Connecticut
Great Neck Breast Cancer Coalition, NY
HARAMBEE House Inc., GA
Healthy Schools Now - WEC, NJ
Informed Green Solutions Inc., VT
LEW Environmental Services LLC, NJ
Locust Point Community Garden, MD
Maryland Children's Environmental Health Coalition, MD
Massachusetts Coalition for Occupational Safety and Health, MA
MGH Innovative One Health Solutions, 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
Ryerson Innovative Enterprises LLC, CA
San Francisco Bay Physicians for Social Responsibility, CA
Saratoga Institute, NY
Selah Natural Medicine Portland, OR and Kalispell Mtn., MT

South Texas Asthma Coalition, TX
Take Care of Your Classroom Air, TX
Toxic Free North Carolina
Metal Workers Local Union #40, CT
West End Revitalization Association – WERA, NC
Women for a Healthy Environment, PA

cc: Janet McCabe
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