May 24, 2023 -via email to int@appro.senate.gov, FY24 OWT

The Honorable Jeff Merkley
Chairman
Appropriations Subcommittee on Interior, Environment & Related Agencies
522 Hart Senate Office Building
Washington, DC 20510

The Honorable Lisa Murkowski
Ranking Member
Appropriations Subcommittee on Interior, Environment & Related Agencies
531 Hart Senate Office Building
Washington, DC 20510

Dear Chairman Merkley and Ranking Member Murkowski:

We, the undersigned fifty-six education, health, environment, and children’s health groups from coast to coast, are writing to urge the Committee to include $100 million for the US Environmental Protection Agency’s (EPA) Office of Air and Radiation/Indoor Environments Division (OAR/IED) to protect school children and personnel from unhealthy environments in schools and childcare facilities. We also request that you include an additional $10 million for EPA’s Office of Children’s Health Protection to increase public health research and services to improve children’s environmental health.

EPA/OAR/IED needs $100 million to lead a national educational campaign, backed by expanded national and regional grants, direct technical assistance, and must prepare guidance for school facilities to help them stay open or reopen quickly after severe disasters. Indoor air quality is critical. It takes months or years to fix or rebuild a school; the nation’s schools need to be able to stay open longer or to reopen safely and quickly after a disaster.

Indoor air pollution is a serious threat and hard to address: it takes longer to identify sources and prioritize repairs than other EPA concerns such as lead in drinking water, PCBs, asbestos, or hazardous waste. Indoor air pollution can arise from everything that goes right and wrong with a facility, thus, indoor air quality (IAQ) assessments begin outside the building, then move to find indoor environment sources. Pollutants can come from poor construction and siting near hazardous facilities; leaky roofs and growing molds; chemical spills and odors from science labs; kitchen, locker room, and or lavatory stench; carbon dioxide accumulations; lack of incoming fresh air; carbon monoxide leaks; cleaning and disinfecting products; and pests and pesticides, or from occupants themselves and the processes and products used in classes. It is complicated; school leaders and communities need education, guidance, and support.

In addition, EPA needs $10 million annually provided to the Office of Children’s Health Protection. This funding is needed to restore investments in research and outreach programs for children’s
environmental health shared with the Centers for Disease Control and Prevention (CDC), the National Institute of Environmental Health Sciences (NIEHS), and the Agency for Toxic Substances and Disease Registry (ATSDR). 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.

**Why school environmental health and the impact on children are urgent issues.** Education is a social determinant of health. 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 IAQ, mold, dust and debris, high heat, poor siting, proximity to hazards, noise, and poor lighting and sanitation, damage children’s “health, thinking, and learning” (Harvard SPH 2017; NRC 2006). Today, some 40% of school age children have at least one existing chronic health issues (CDC), including asthma, which affects 1 in 13 school-aged children and remains the leading cause of school absenteeism due to chronic illness.

Also, US schools are not climate-ready—suggesting more long-term school closures ahead in many parts of the country – and not epidemic-ready, again suggesting more frustrating closures and hybrid learning schemes ahead that will increase persistent learning losses in the next generation of adults.

- School attendance is mandatory in all states, and 98% of US children are in school every day.
- Schools are more densely occupied than nursing homes and less well maintained.
- 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 contain over 8 billion square feet of learning space valued at over $3 trillion, which means more frequent long-term school closures ahead if they are not physically resilient. Investments in electric buses and energy retrofits are deeply appreciated and welcome, but those steps will not guarantee that a facility will survive the next super storm.

This is the Congress’ 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 health and learning outcomes for children, especially for those most disadvantaged, including children with disabilities.

We appreciate the funding for school infrastructure through the various COVID programs, ARPA, BIL, and IRA, however EPA gets a scant $50 million over 10 years from IRA to address indoor air. 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. In fact, neither ED nor CDC have authorizations or in-house expertise
on school facilities. To date, EPA’s level of funding is embarrassingly small, considering the documented environmental problems in schools, and the lack of knowledge in communities and among education leaders on how to address those issues effectively.

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 states 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.

This is your moment to make a big difference in children’s lives. Put US EPA’s proven expertise to work to improve health and learning outcomes for all children, especially those most disadvantaged or with disabilities. A nation that wants to stay competitive must invest in the next generation, its children.

Thank you for your consideration of our request.

Sincerely,

21st Century School Fund
Alaska Community Action on Toxics
Allergy Standards Limited
Alliance of Nurses for Healthy Environments
American Federation of Teachers
American School Health Association
Associated Sheet Metal & Roofing Contractors of CT
Asthma and Allergy Foundation of America
Carrier
Center for Cities + Schools, University of California-Berkeley
Children's Environmental Health Network
Children's Environmental Protection Alliance
Coalition for Environmentally Safe Schools
Coalition for Healthier Schools
Collaborative for High Performance Schools
ComingClean
ConnectiCOSH Health Technical Committee Inc.
Connecticut AFL-CIO
Connecticut Education Association
Connecticut Roundtable on Climate and Jobs
EARTHDAY.ORG
First Focus on Children
Foundation for Fair Contracting of Connecticut
Go Green Initiative
Green Schools National Network
Health Promotion Consultants
Healthy Schools Caucus
Healthy Schools Network
iAIR Academy
iAIR Institute
International WELL Building Institute
Maryland Children's Environmental Health Coalition [MD CEHC]
MassCOSH - Massachusetts Coalition for Occupational Safety & Health
National Association of Energy Service Companies
National Association of School Nurses
National Center for Healthy Housing
National Education Association
National PTA
National Wildlife Federation
New Jersey Association of Designated Persons
NJ Work Environment Council
PCBinschools.org
Physicians for Social Responsibility Colorado
Protect All Children's Environment
Public Health - Seattle & King County
Rayben Enterprises, Inc. dba Green Facility Solution
Responsible Purchasing Network
San Francisco Bay Physicians for Social Responsibility
School-Based Health Alliance
Selah Natural Medicine
Society for Public Health Education
Society of State Leaders of Health and Physical Education
UConn Health and University of Connecticut's Indoor Air Quality Initiative
WEACT for Environmental Justice
Women for a Healthy Environment/Healthy Schools PA

Contact: Claire Barnett, Executive Director, Healthy Schools Network, 202-543-7555