

## Executive Summary

**An assessment of state capacity building to improve conditions  
of schools and children's environmental health**

**U.S. EPA Office of Children's Health Protection  
Green and Healthy Schools Initiative Voluntary State Grants  
and School Environmental Health Guidelines:**

***A Key Informant Survey of State Agencies and Advocates***

**Fall 2013**

**Report Commissioned by**



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## Executive Summary and Recommendations

The Energy Independence and Security Act of 2007 (EISA) authorized the Environmental Protection Agency (EPA) to provide grants to support states in addressing environmental health issues in schools and mandated development of voluntary guidelines for siting of school facilities and school environmental health programs. EISA also directs the Office of Federal High Performance Green Buildings within the General Services Administration to work collaboratively with EPA to make available “to the maximum extent practicable,” information on the exposure of children to environmental health hazards in schools. In October 2012, the US Environmental Protection Agency’s Office of Children’s Health Protection (OCHP) released its *Voluntary Guidelines for States: Development and Implementation of a School Environmental Health Program* (Guidelines). The role of OCHP and the Guidelines for states are both firsts; heretofore, EPA guidelines for improving schools were generated by EPA program offices and focused on individual buildings or districts.

This new effort by OCHP occurred against the backdrop of a fiscal climate that has forced states and the federal government to make cuts to critically important programs. The EPA’s 2012 budget marked the second year of cuts for the agency. Spending reductions to programs that impact children’s environmental health continued as the EPA and Centers for Disease Control and Prevention reduced their fiscal year (FY) 2013 budgets in accordance with the sequestration order that took effect on March 1, 2013. Local and state public health programs are increasingly strained by cuts at all three levels of government and as indicated by several respondents to our survey, environmental health programs are especially vulnerable to political attacks. While the fiscal and political climate may isolate the EPA’s new child protection program, the Guidelines provide states and the EPA with an opportunity to address a long neglected area of concern.

In conjunction with the release of the Guidelines, EPA announced the award of voluntary grants (RFA Feb 2012) to help states create, implement and evaluate projects consistent with the Guidelines. Five states (Connecticut, New York, Ohio, Minnesota and Wisconsin) were awarded grants totaling approximately \$750,000 (up to \$150,000 per state) to support efforts to (cite RFP deliverables) (1) provide technical assistance for EPA programs including Tools for Schools and the Healthy School Assessment Tool and (2) develop and implement state school environmental health programs. Applicants were evaluated on the basis of their technical approach, management capability, cross-agency coordination, and plan for tracking and measuring progress on project outputs and outcomes including impact on low-income, tribal, minority and other underserved communities. Grantees are required to submit project activity reports throughout the duration of the project and provide a final report to EPA at the end of two-year grant period.

The Healthy Schools Network commissioned an independent assessment of state progress in implementing school environmental health programs in accordance with the Guidelines. The

assessment is based on a survey of grant coordinators and school environmental health advocates in the five states awarded grants.

This report summarizes the results of the survey and provides recommendations on how EPA can strengthen its partnerships and further support school environmental health programs in states. Recommendations for state agencies (based on insight from in-state advocates in CT, NY and WI) are also provided.

***Key findings:***

- While the EPA fulfilled its Congressional authorization to provide voluntary guidelines and grants to support school environmental health programs, information gaps remain in key areas outlined in EISA including guidance on how states can collaborate with federally funded pediatric environmental health centers in on-site environmental investigations and data on children's exposure to environmental hazards in schools.
- The EPA's agency-wide 2011-2015 strategic plan and the RFA for the grant program underscore the importance of tracking and measuring progress on environmental health exposures among low-income, tribal, minority and other underserved communities however only one state (CT) explicitly described efforts to target underserved communities.
- All but one state reported substantial progress with implementing projects funded under the OCHP grant program.
- Consistent with the Guidelines, a common component of all programs is a state-level advisory committee that includes representatives from various stakeholders groups including unions and organizations that represent teachers, superintendents of buildings and other school personnel, environmental health organizations, state agencies and business associations.
- Overall, states appear to lack sufficient mechanisms to track and respond to student exposure to environmental health hazards in schools. Respondents outlined a variety of processes, mostly at the local level for addressing such complaints.
- The need for additional resources (financial, personnel) is a shared concern among grant coordinators. Funding for schools to implement environmental improvements is needed to ensure compliance and reporting. Schools are reluctant to participate fully in a voluntary program with no funds to support additional activities.
- State decision-making on school environmental health activities is not directly related to child health outcomes.
- Overall, advocates rate their state's current school environmental health program fairly low. The average rating among the three states (CT, NY, WI) assessed by advocates is 2.6 on a scale from 1 to 5. Advocates offered state-specific reasons for their ratings and how the programs can be improved; however two consistent themes emerged in their responses: the need for enforcement of existing laws and a lack of focus on children's health.
- Advocates view emergency management as a top priority for their states over the next three years. In contrast, grant coordinators ranked emergency management at the bottom of priorities for their states for the next three years.

- The average rating of EPA's Guidelines among the three advocates is 2.6. Two rated the Guidelines at a 2, while one provided a relatively high rating of 4. The low ratings were due to errors that have not been corrected by EPA, lack of consistency in addressing topics such as students with disabilities or environmental justice, and absence of enforcement power. The high rating was attributed to the "desperate need" for the Guidelines and elevation of school environmental health issues at a national level.

### ***Recommendations***

- Increase funding levels and extend the grant period. The limited funds and time (18-24 months) allocated to the program hinders the ability of states to hire qualified personnel dedicated to school environmental health. These constraints also make it difficult for states to implement data collection systems necessary for program evaluation and tracking of child health outcomes.
- Emphasize the importance of data on exposures and their impact on children's health. Most projects funded under the cooperative agreement rely primarily on process measures such as the number of trainings and school personnel trained on Tools for Schools. EPA should outline key evaluation measures for state school environmental health programs and provide grant support to assist states with establishing state-wide data collection systems.
- EPA should correct the errors in the Guidelines previously noted by the advocacy community. HSN outlined inaccuracies and inconsistent information in an October 2012 letter to the EPA. Many of those concerns have yet to be addressed.
- The Guidelines should be promoted more heavily, especially to major national educational associations, major districts, and to the public health community, as well as NGA and NCSL.
- Build on EPA's commitment to environmental justice communities and climate change by further defining and integrating community education and outreach in the Guidelines and future grant programs.
- Laws are needed at the state level to provide agencies with clear authority to enforce environmental health concerns in schools. One agency, such as the state health department should have ultimate authority for ensuring schools meet environmental health standards and remediate problems. Environmental health issues in schools are spread across several agencies such as education, health and environment/pollution control departments.
- Permanent structures are needed within states to ensure that agencies are engaging educators, parents and advocates. The advocates interviewed for this survey describe interaction between state agencies and the advocacy community as inconsistent and intermittent. The state-wide advisory committees recommended in the Guidelines may serve as a model for the type of organizational structure needed to maintain regular communication, collaboration and accountability.

Overall, the Guidelines have been well received by state coordinators and advocates interviewed for this study. The Guidelines are a welcome resource that raises visibility of school

environmental health issues on a national level and signifies the EPA's recognition of the importance of healthy school environments for children.

Several key reports including *Towards Healthy Schools 2015* published by the Coalition for Healthier Schools (coordinated by the Healthy Schools Network) and *Who's in Charge of Children's Environmental Health At Schools?* have documented the unaddressed environmental health risks in our nation's schools including decaying facilities, indoor air quality issues, pests, chemical management, cleaning processes and products.<sup>1</sup> The EPA's grant program provides much needed financial support to build and enhance state-based programs to address these concerns. While the grants are an important step toward reducing children's exposure to environmental health hazards, the results from this small yet informative survey of school environmental health programs in the five states awarded cooperative agreements suggest that states are facing an uphill battle to improve conditions in schools and health outcomes for children.

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<sup>1</sup> Paulson, J and Barnett, C. 2010. "Who's in Charge of Children's Environmental Health at Schools?" *New Solutions*, 10(1):3-23; *Towards Health Schools 2015* available at: <http://www.healthyschools.org/HealthySchools2015.pdf>