

March 12, 2006

Secretary Michael Leavitt
Administrator
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Secretary Leavitt:

I am writing to you on behalf of the Advisory Committee on Childhood Lead Poisoning Prevention (ACCLPP). The committee has published in October 2004 the document, "Preventing Lead Exposure in Young Children: A Housing-Based Approach to Primary Prevention of Lead Poisoning" in which we review the importance of primary prevention of lead exposure and lead poisoning. The committee reiterated this commitment to primary prevention of lead exposure and lead poisoning in "Preventing Lead Poisoning in Young Children: A Statement from the Centers for Disease Control and Prevention", published in August 2005.

In drafting and finalizing these documents, the ACCLPP has collaborated with many partners, and federal agencies and non-governmental organizations are represented among the committee's membership. Many of the recommendations of the two documents require actions from local and state health departments and from the two major federal partners to the Department of Health and Human Services (HHS), the Department of Housing and Urban Development (HUD) and the Environmental Protection Agency (EPA). The initiation and maintenance of primary prevention activities by local and state health and housing jurisdictions is dependent upon leadership at the federal level, particularly with the provision of adequate technical assistance and funding resources. Research results on the best methods and interventions to successfully implement primary prevention are also vital.

As the guidance documents discussed above were issued by the U.S. Department of HHS, ACCLPP members think that HHS should play a strong leadership role in the implementation of and institutionalization of the primary prevention of lead poisoning. This could include provision of education, information, funding, and technical assistance and funding and encouragement of applied research regarding best practices for implementation. We would recommend that HHS review its mission and policies, and identify areas and opportunities in which primary prevention could be incorporated into already existing or new programs.

One example we would recommend is to evaluate the use of Temporary Assistance to Needy Families (TANF) funds that are used by the recipients to pay for their housing. We suspect that some of every recipient's stipend is used to pay for his/her housing. We are wondering if there has been any effort to evaluate the extent of TANF funds that go toward paying funding expenses or the type and quality of housing that is funded. We would suggest that quality of housing be factored into the use of the TANF monies. The concern is due to the fact that many low-income individuals live in areas with substandard housing. The risk from housing for lead exposure is highest when young children with a high degree of hand-to-mouth activity (generally up to age 3 years) inhabit homes that are old enough to have lead-based paint present (generally pre-1978 housing) and that are deteriorated or in poor repair. These types of homes are typical of many low-income areas in cities and other areas with a large pre-1978 housing stock which may have had deferred maintenance and repair. The ACCLPP has invited representatives from the Administration for Children and Families (ACF) within HHS to several of our latest meetings, without identifying someone willing to address our committee regarding our concerns. We hope that this more formal request to you for information and dialogue might result in more communication regarding this issue.

In conclusion, the Advisory Committee on Childhood Lead Poisoning Prevention (ACCLPP) requests a dialogue with your department regarding opportunities to facilitate institutionalization and implementation of primary prevention of lead poisoning and lead exposure in young children. We look forward to your response and further dialogue with you on this important matter.

Sincerely yours,

Carla Campbell, MD, MS
Chairperson
Advisory Committee on Childhood Lead
Poisoning Prevention