

October 21, 2013

Dr. Howard K. Koh
Assistant Secretary for Health
US Department of Health and Human Services
200 Independence Avenue S.W.
Washington, D.C. 20201

Dear Dr. Koh:

We are writing to urge the Centers for Disease Control and Prevention (CDC) to reconsider a tentative decision to disband the Advisory Committee on Childhood Lead Poisoning Prevention (ACLPPP), to discontinue its charter, and to demote lead poisoning prevention to a subcommittee of the Board of Scientific Counselors (BSC) of the National Center for Environmental Health. We are seeking immediate action to preserve the Committee since its current charter is due to expire on October 31st.

On January 4, 2012, ACLPPP issued a major public health report that recommended that CDC eliminate the use of the term 'level of concern' since no blood lead level without effects on children could be identified, and that the public health community recognize a childhood blood lead concentration of $\geq 5 \mu\text{g}/\text{dL}$ as a reference concentration above which medical and public health attention is advised. This recommendation represented a substantial departure from prior guidance, issued in 1991, that identified $10 \mu\text{g}/\text{dL}$ as a blood lead level of concern. CDC accepted ACCLPP's recommendation in April 2012. The policy change increased the number of children estimated to have elevated blood lead concentrations nationally from 77,000 children to 535,000.

Paradoxically, shortly after this action expanding the scope of the nation's childhood lead poisoning problem, the budget allocated to the CDC's childhood poisoning program was cut by 94%. A series of continuing budget resolutions by Congress have funded the program at less than \$5 million a year, effectively terminating longstanding federal support that had enabled state and local health departments to identify, track, and prevent childhood lead poisoning. Just recently, in September 2013, officials at CDC announced their tentative proposal to discontinue the charter of the ACCLPP as a discretionary federal advisory committee.

ACCLPP has long been regarded by national and international bodies as the preeminent science advisory body for medical and public health guidance on childhood lead poisoning prevention. In addition to evaluating the scientific research that shapes CDC's efforts to prevent childhood lead poisoning, ACLPPP has published authoritative guidance on topics such as lead exposure during pregnancy, and case management of lead-exposed children. ACCLPP recommendations on childhood lead poisoning have not only directly benefited CDC, but have formed the basis for preventive public health efforts by a panoply of national and international agencies, including the Environmental Protection Agency, the Department of Housing and Urban Development, the Food and Drug Administration, the Health Resources and Services Administration, the Consumer Products Safety Commission, the World Health Organization, and other international, state, and local governments and organizations.

As a newly formed subcommittee of BSC, the entity proposed to replace ACCLPP would encounter restrictions on its ability to offer policy guidance on lead poisoning prevention. Unlike the currently chartered ACCLPP, a subcommittee of BSC could only report to the parent committee and would not be allowed to recommend policies or strategies to the Director of CDC and the Secretary of HHS. In the past, subcommittees have seldom been convened by the BSC, which is an advisory body that has served principally to oversee external peer reviews of NCEH/ATSDR programs. Rather than fostering efficiency, disbanding the ACCLPP and filtering future guidance and recommendations on lead poisoning prevention through the BSC will increase bureaucracy and foster delay without adding public health value.

Recent research documenting the expanded scope and dimension of childhood lead poisoning argues that this challenge requires more rather than less attention and resources. In view of the high societal cost associated with the persistent adverse developmental effects of lead, preventive efforts are highly cost effective. The policy expertise and innovative, independent guidance of ACCLPP is one of HHS' few remaining assets in the fight to eliminate this preventable public health problem.

We thank you for your consideration and all that you do to protect the nation's health. Should more information be desired, please contact Deborah Cory-Slechta at 585-275-7060 or deborah_cory-slechta@urmc.rochester.edu.

Janet Abboud Dal Santo,
University of Texas at San Antonio
Wafaa Aborashed
Bay Area Healthy 880 Communities
Carlos Aguilar
Coalition for Economic Survival
Cynthia Ahler
Minnesota Department of Health/Environmental Health
Georgia Ahlers
Vanessa Albert
Mary Alexander
Chris Alexander
Miguel Angel Alfaro
Centro Ecologista Renacer, Villa Constitucion- Pcia, Santa Fe, Argentina
Suzanne Allison, RN, BSN
Max Anderson
Berkeley City Council, District 3, Retired RN
Tara Anderson
Stephanie Annunziata
Coalition to Prevent Lead Poisoning
Martha Arguello
Physicians for Social Responsibility- Los Angeles
Jose Manuel Arias Rodriguez
Asociacion Ecologica Santo Tomas A.C.
Karla Armenti
State Public Health Surveillance
Bruce Askanas
Courtney Bajdas
Alejandra Ballon
PUCP
Claire Barnett
Healthy Schools Network
Jane Basler
Debora Bastian
Harry Batt
Patricia Beach, MS, CIH
Independent Environmental Consultant
Jennifer D. Becker MPH
University of Rochester School of Medicine
Fernando Bejarano

RAPAM-CAATA Mexico
David Bellinger, Ph.D., M.Sc.
Boston Children's Hospital, Harvard Medical School, Harvard School of Public Health
John G. Benitez, MD, MPH
Tennessee Poison Center
Jeanne Beutner
Cecilia Bianco
Taller Ecologista
Norman Blanco
Liz Borkowski
George Washington University School of Public Health & Health Services
Asa Bradman, PhD
Center for Environmental Research and Children's Health, School of Public Health, UC Berkeley
Joseph Brain
Harvard University School of Public Health
Charlotte Brooks
Carrie Brumfield
Terry Bruno
Susan Buchanan, MD, MPH
Great Lakes Center for Children's Environmental Health, University of Illinois at Chicago School of Public Health
Catherine Bullwinkle
Joanna Burger
Rutgers University
Kathleen M. Burns, Ph.D.
Sciencecorps
Beth Butler
A Community Voice
Perry Cabot
County Health Program in Oregon
Melinda Cameron, MD
University of Buffalo School of Medicine, Asst. Professor of Pediatrics
Michelle Campbell
Carla Campbell, MD, MS
Drexel School of Public Health, Philadelphia, PA
Barry Castleman
Environmental Consultant

Ofelia Cavazos Edmondson
Retired public health inspector

Anna Cederstav

Libby Chaplin

Todd Christophel
Concerned parent of lead-poisoned child

Amaka Chukwuma
LA County, Department of Public Health

Al Clancy

Scott Clark
Professor Emeritus, University of Cincinnati

Karen Cohn

Sister Kathleen Coll
Catholic Health East

Deborah Cory-Slechta
University of Rochester School of Medicine

Francisco Covarrubias

Judy Coyne Becker
Troy Architectural Program, Inc.

James Dahlgren
Retired, Assistant Clinical Professor of Medicine
David Geffen School of Medicine at UCLA

Samantha Dalsing

Holly Davies
Washington State Department of Ecology

Rochelle Davis
Healthy Schools Campaign

Daniel Deuek
Monroe County Health Dept

Denise Devall
AIHA San Diego Local Section

Sophia DeWitt
Fresno Interdenominational Refugee Ministries

Kim Dietrich
University of Cincinnati College of Medicine

Ronald Dobbin
Society for Occupational and Environmental Health

Kathryn C. Dowling

Lisa DuLany
Presbyterian Church, USA

Margaret Eggers
Montana State University

David Eherts
OKI

Kimberly Emilo

Kathleen Fagan, MD, MPH
Adjunct Assistant Professor, Case Western Reserve
University School of Medicine

Richard Fatur
Colorado Department of Public Health and
Environment, Supervisor Lead Program

Nan Feyler
Philadelphia Department of Public Health

Myra Finkelstein, Ph.D.
University of California, Santa Cruz

Alison Fischman

A. Russell Flegal
University of California, Santa Cruz

Kathryn Fletcher

Ginny Fontenot

Jo Forchione
Pacific Gas and Electric Company

Arthur Frank
Drexel University School of Public Health

Laurie Freyder

Heidi Fruhlinger

Christine Gabel, DVM, PhD
University of Wisconsin, Eau Claire

Audrey Gaines
Bridgeport, CT Health Department

Jose A. Garcia
Executive Director, Inquilinos Unidos (United
Tenants)

Sher Gardner
Academic

Janvier Gasana
South Florida Asthma Consortium

Peggy Geimer

Patricia Gerez

Maria Gil-Beroes
Fundacion Aguaclara, Caracas, Venezuela

Kathleen Gilbert

Benjamin A. Gitterman, M.D.
Member, American Public Health Association

Barbara Glenn

Michael H. Goldhaber
Community Environmental Advisory Commissioner,
Berkeley, CA

Jeffrey Goldhagen
University of Florida, Department of Pediatrics

David F Goldsmith, PhD
Georgetown and George Washington Universities,
Washington DC

Perry Gottesfeld MPH
Occupational Knowledge International

Rachael Greenberg

Jonathan Greenberg
Lecturer, Stanford Law School

Felipe Grez
Observatorio Latinoamericano de Conflictos
Ambientales - OLCA

Karen Gunderson

Sue Gunderson
CLEARCorps USA
Farhana Habib, MD MPH
William Hale
Gary Hanes
Idaho Council of Healthy Homes
Carol Hannaford
Michael Harbut, MD, MPH
Wayne State University
Erin Haynes
University of Cincinnati
Steve Hays
American Industrial Hygiene Association
Roberta Hazen Aaronson
Childhood Lead Action Project
Nancy Heidinger
Parent
Gale Heinrich
Rebecca Henry
Erie County Health Department- CLPP/LHC
Jayne Heringhausen RN, MSN
Saginaw County Department of Public Health,
Healthy Homes and Lead Hazard Control Program
Steven Hinde
Riverside County Environmental Health Department
Karen Hipkins
Richard Hirsh, MPH, CIH
American Industrial Hygiene Association, Northern
California Section, Chair, Developing World
Outreach Initiative Committee, Chair - AIHA
International Affairs Committee
Doris Hogan
David Hornung
Michael Horowitz CIH
Cal/OSHA
Ronald Howell
25+ Years in industrial hygiene and public health
Howard Hu
Dalla Lana School of Public Health, University of
Toronto
Kathryn Hubicki
Dawn Hyde
Monroe County Dept. of Public Health
Leilani Ishaan
David Jacobs
University of Illinois at Chicago School of Public
Health; National Center for Healthy Housing
Marisa Jacott
FRONTRAS COMUNES A.C. (NGO)
Alan Johanns
City of San Diego

Mary Teresa Johnson
Elmhurst College (Nursing Department faculty)
Helah Jones
Get The Lead Out (GTLO) Coalition of the Alameda
County Community Development Agency
David Kahane, MPH, CIH AIHA Fellow
Forensic Analytical
Carolyn Kawecki
Marty Keller
Stephanie Kellner
Student, University at Buffalo, School of Public
Health
J. Kilcoyne
Christopher King, PhD
Saint Louis University College for Public Health and
Social Justice
Robert Kino
Chris Kirkham
Cal OSHA
Gary Kirkmire
Coalition to Prevent Lead Poisoning
Brandon Kitagawa
Linda Kite
The Healthy Homes Collaborative
Robert Kleinerman, MPH, CIH
President Elect, American Industrial Hygiene
Association, Northern California Section
Henry Klesh
Jed Koball
Presbyterian Church (USA)
Mary Koebler
Michael Kosnett MD
University of Colorado School of Medicine
Katrina Korfmacher
Coalition to Prevent Lead Poisoning
Heidi Krapfl
Epidemiologist
Thomas Kruzen
Former Missouri Chapter Sierra Club Mining Chair
and current Water Sentinel Volunteer
Sandra Kuntz
Montana State University
Alice La Pierre
Energy Efficiency Coordinator, City of Berkeley
Daniel Lopez Martinez
Heidi Lach
Bio-pharma
Joseph LaDou, MD
University of California School of Medicine, San
Francisco
Cyrus LaFarre

Parent
Philip John Landrigan, MD, MSc, DIH, FAAP,
FACOEM
Dean for Global Health, Ethel H. Wise Professor,
and Chairman, Department of Preventive Medicine,
Icahn School of Medicine at Mount Sinai

Bruce Lanphear
Child & Family Research Institute, BC Children's
Hospital, Simon Fraser University, Vancouver BC

Jeff LaPenna
Diana Larson
Regulo Leon Arteta
Christopher Lee
Stephen Leland
Academic
Dias Leonardo
Sengsouvanh Leshnick
Charles Levenstein
Professor Emeritus, University of Massachusetts
Lowell

Marianne Levitsky
Kathy Lewis
Coalition to Prevent Lead Poisoning, Rochester, NY

Ted Lidsky
Rebecca Lincoln
Angel Llerena
RAPAL Ecuador

Naomi Lobell
Jennifer Lowry
Children's Mercy Hospital

Beverly Ludwig
Lancaster General Health

Priscilla Lum
Patrick MacRoy
Amal Mahfouz
Retired toxicologist

Erica Majumder
Academic Chemist

Jane Malone
National Center for Healthy Housing

Morri Markowitz, MD
Albert Einstein College of Medicine and the
Children's Hospital at Montefiore

Barbara Materna
California Department of Public Health,
Occupational Health (identification purposes only)

Diane Matthew Brown
David McCormick
Indiana State Department of Health

Elizabeth McDade
Coalition to Prevent Lead Poisoning

Beth McKee-Huger
Greensboro Housing Coalition

Michael McKinnon
CEO, Hygenall Corporation

Pat McLaine, DrPH, MPH, RN
University of Maryland School of Nursing

Katherine McNamara
Dinorah Meyer
Howard W Mielke, PhD
Tulane University School of Medicine

Gerardo Moncada Martinez
Air Quality Director, El Poder del Consumidor,
Mexico

Stephanie Moraga-McHaley
New Mexico Department of Health

Rebecca Morley
National Center for Healthy Housing

Karen B. Mulloy, D.O., M.S.C.H.
Case Western Reserve University, School of
Medicine

Jaime Murphy Dawson, MPH
Paul Mushak
Senior Partner, PB Associates , Durham, NC

Kay Napoleon
Jodi Nelson
Tom Neltner
Lisa Nesson
Carolyn Newcomb
Retired teacher; activist for children's rights

Nicholas Newman
Cincinnati Children's Hospital/University of
Cincinnati

Tania Noguera
Adrienne Norman
California Department of Public Health, Childhood
Lead Poisoning Prevention Branch

Ruth Ann Norton
National Coalition to End Childhood Lead Poisoning

Patricia Nussle
Mother, pharmacist, scientist

Anne Nutt
Zuleica Nycz
Toxisphera APROMAC Coalition

Renee O'Brien
Elizabeth O'Brien
Manager, Global Lead Advice and Support Service
(GLASS) of the Lead Education and Abatement
Design (LEAD) Group Incorporated

Dan O'Dea
Lisa O'Dell
Julie O'Grady

Thomas Ogren
Society for Allergy Friendly Environmental
Gardening

Crystal Owensby
Resident of NJ

Veronica Padilla
Pacoima Beautiful

Kathleen Paulson
AIHA and AWMA

David Payette, CIH, CSP, EMT
SMUD

Jenna Pelaez

James Peralta
Interstate Property Inspections Inc

Daniel Perrot

Roberto Piccioni

Julie Pierre

Irene Pinedo

Thomas Plant
Boston Public Health Commission

Barbara Polivka
University of Louisville

Carol Pollard
Kansas City MO Health Department

Elena Popp
Eviction Defense Network

Wesley Priem
Healthy Homes Section, Michigan Department of
Community Health

Richard Rabin

Jean Rabovsky, Ph.D.
Retired

Cheryl Rainey
Concerned citizen

Faye Ralston
Independent Consultant, Lead Poisoning Prevention

James Ratti

Richard Reibstein
Adjunct Professor, Environmental Law and Policy,
Boston University, the Regulated Community
Compliance Project.

Mary Reynolds
Presbyterian Women of Giddings-Lovejoy
Presbyterian

Laura Riddell

Amy Roberts
City of Kansas City Missouri Health Department,
Childhood Lead Poisoning Prevention Program

David Rosner, PhD
Columbia University

Scott Ross

Stephen Rothenberg
National Institute of Public Health, Cuernavaca,
Morelos, Mexico

Kathleen Ruff
Rideau Institute

Diana Rupprecht

Jonathan Rutchik
University of California San Francisco

Don Ryan
Board Member, Rebuilding Together
Arlington/Fairfax/Falls Church

Rachael Sak
Megan Sandel MD MPH
National Center for Medical-Legal Partnerships

Dave Sandusky
Forensic Analytical Laboratories

Jennifer Sass
Natural Resources Defense Council

Stanley Schaffer
Western New York Lead Poisoning Resource Center

Jennifer Schladweiler, RN, BSN
OEH MN & PMHNP Certificate Graduate Nursing
Programs, University of Washington

Matthew Schmitz
Jay Schneider, Ph.D.
Thomas Jefferson University

Peter Scholz
Cal/OSHA

Leilani Schwarcz

Gloria Sennert

Queen Zakia Shabazz
Mother of a lead poisoned child, United Parents
Against Lead, National, Inc.

Susan Sheets RN
Wayne County Public Health Lead Program

Michelle Shishkin
LA County CLPPP

J. Edward Simpson
State of Illinois Department of Public Health
Childhood Lead Program (Illinois Lead Program)

Susan Smith
Donald R. Smith
University of California, Santa Cruz

Steve Smith, CIH
Jodi Smith, MS, CIH, CSP
Rosemary Sokas, MD, MOH
Georgetown University

Greg Spiegel
Inner City Law Center

Joseph Stankaitis
Monroe Plan for Medical Care

Joshua Stein
University of California, San Francisco
Terence Steinberg
Henry Steinberg
Attorney
Muriel Stephens
Presbyterian
Christine Stipp, PHN
Marin County CLPPP Coordinator
Carleton Stock
Presbytery of Giddings-Lovejoy, Presbyterian
Church (USA)
Rev. Elinor Stock
Presbyterian Church (USA)
Derry Stover, MPH
Rosemary Strub
Ontario County Public Health; Canandaigua, NY
Barbara J. Strupp
Cornell University
Kathy Swarthout
Yates County Public Health
Mark Taylor
Academic
Amelia Tena
Pacoima Beautiful
Nicole Thomsen
Colleen Thornton
A graduate of public health school
Miguel Angel Torres
Janel Townsend
Nina Townsend
Cecile Truong
Orange County Health Care Agency, California
Luis Tuninetti
Eco Sitio
Julie Twichell
Bay Area Get the Lead Out Coalition
Kerry Van Auken
Jeff Van Slooten
Susan Vickers
Dignity Health
Patricia Vidales

GAIA
Joseph Walseth
San Francisco Dept. of Public Health Childhood
Lead Prevention Program
Leslie Warden
Raphael Warshaw
George Washington
UC Davis
Alisa Wasserman
Lee Wasserman
Industry advocate and practitioner
Virginia Weaver, MD, MPH
Johns Hopkins University
Jeffrey Weidenhamer, Ph.D.
Ashland University
Stephen Weil
Lead and Environmental Hazards Association
Howard Weinberger
Upstate Medical University - Syracuse, NY
Richard Weinstein, MD, MPH
Michael Weitzman MD
New York University School of Medicine, Professor
of Pediatrics
Roberta Welling
formerly with California Childhood Lead Poisoning
Prevention program
Martin Wesley
Janet Westervelt
Sarah Westervelt
Karen Wilson
Presbyterian Church (USA)
Rhoda Wilson
LEW Corporation
Amy Winslow
Kim Woodhouse
George Yocher
American Public Health Association, Council of
State and Territorial Epidemiologists
Leslie Yuan
Chris Zimmer
OSHA

CC: Kathleen Sebelius, Secretary, Health and Human Services
Thomas Frieden, Director, Centers for Disease Control and Prevention
Cecilia Munoz, Director, Domestic Policy Council, Executive Office of the President