

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 (ACCLPP), 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, ACCLPP 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 ≥ 5 $\mu\text{g/dL}$ 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 $\mu\text{g/dL}$ 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, ACCLPP 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	Nan Feyler
Retired public health inspector	Philadelphia Department of Public Health
Anna Cederstav	Myra Finkelstein, Ph.D.
Libby Chaplin	University of California, Santa Cruz
Todd Christophel	Alison Fischman
Concerned parent of lead-poisoned child	A. Russell Flegal
Amaka Chukwuma	University of California, Santa Cruz
LA County, Department of Public Health	Kathryn Fletcher
Al Clancy	Ginny Fontenot
Scott Clark	Jo Forchione
Professor Emeritus, University of Cincinnati	Pacific Gas and Electric Company
Karen Cohn	Arthur Frank
Sister Kathleen Coll	Drexel University School of Public Health
Catholic Health East	Laurie Freyder
Deborah Cory-Slechta	Heidi Fruhlinger
University of Rochester School of Medicine	Christine Gabel, DVM, PhD
Francisco Covarrubias	University of Wisconsin, Eau Claire
Judy Coyne Becker	Audrey Gaines
Troy Architectural Program, Inc.	Bridgeport, CT Health Department
James Dahlgren	Jose A. Garcia
Retired, Assistant Clinical Professor of Medicine	Executive Director, Inquilinos Unidos (United
David Geffen School of Medicine at UCLA	Tenants)
Samantha Dalsing	Sher Gardner
Holly Davies	Academic
Washington State Department of Ecology	Janvier Gasana
Rochelle Davis	South Florida Asthma Consortium
Healthy Schools Campaign	Peggy Geimer
Daniel Deuek	Patricia Gerez
Monroe County Health Dept	Maria Gil-Beroes
Denise Devall	Fundacion Aguaclara, Caracas, Venezuela
AIHA San Diego Local Section	Kathleen Gilbert
Sophia DeWitt	Benjamin A. Gitterman, M.D.
Fresno Interdenominational Refugee Ministries	Member, American Public Health Association
Kim Dietrich	Barbara Glenn
University of Cincinnati College of Medicine	Michael H. Goldhaber
Ronald Dobbin	Community Environmental Advisory Commissioner,
Society for Occupational and Environmental Health	Berkeley, CA
Kathryn C. Dowling	Jeffrey Goldhagen
Lisa DuLany	University of Florida, Department of Pediatrics
Presbyterian Church, USA	David F Goldsmith, PhD
Margaret Eggers	Georgetown and George Washington Universities,
Montana State University	Washington DC
David Eherts	Perry Gottesfeld MPH
OKI	Occupational Knowledge International
Kimberly Emilo	Rachael Greenberg
Kathleen Fagan, MD, MPH	Jonathan Greenberg
Adjunct Assistant Professor, Case Western Reserve	Lecturer, Stanford Law School
University School of Medicine	Felipe Grez
Richard Fatur	Observatorio Latinoamericano de Conflictos
Colorado Department of Public Health and	Ambientales - OLCA
Environment, Supervisor Lead Program	Karen Gunderson

Sue Gunderson	Mary Teresa Johnson
CLEARCorps USA	Elmhurst College (Nursing Department faculty)
Farhana Habib, MD MPH	Helah Jones
William Hale	Get The Lead Out (GTLO) Coalition of the Alameda
Gary Hanes	County Community Development Agency
Idaho Council of Healthy Homes	David Kahane, MPH, CIH AIHA Fellow
Carol Hannaford	Forensic Analytical
Michael Harbut, MD, MPH	Carolyn Kawecki
Wayne State University	Marty Keller
Erin Haynes	Stephanie Kellner
University of Cincinnati	Student, University at Buffalo, School of Public
Steve Hays	Health
American Industrial Hygiene Association	J. Kilcoyne
Roberta Hazen Aaronson	Christopher King, PhD
Childhood Lead Action Project	Saint Louis University College for Public Health and
Nancy Heidinger	Social Justice
Parent	Robert Kino
Gale Heinrich	Chris Kirkham
Rebecca Henry	Cal OSHA
Erie County Health Department- CLPP/LHC	Gary Kirkmire
Jayne Heringhausen RN, MSN	Coalition to Prevent Lead Poisoning
Saginaw County Department of Public Health,	Brandon Kitagawa
Healthy Homes and Lead Hazard Control Program	Linda Kite
Steven Hinde	The Healthy Homes Collaborative
Riverside County Environmental Health Department	Robert Kleinerman, MPH, CIH
Karen Hipkins	President Elect, American Industrial Hygiene
Richard Hirsh, MPH, CIH	Association, Northern California Section
American Industrial Hygiene Association, Northern	Henry Klesh
California Section, Chair, Developing World	Jed Koball
Outreach Initiative Committee, Chair - AIHA	Presbyterian Church (USA)
International Affairs Committee	Mary Koebler
Doris Hogan	Michael Kosnett MD
David Hornung	University of Colorado School of Medicine
Michael Horowitz CIH	Katrina Korfmacher
Cal/OSHA	Coalition to Prevent Lead Poisoning
Ronald Howell	Heidi Krapfl
25+ Years in industrial hygiene and public health	Epidemiologist
Howard Hu	Thomas Kruzen
Dalla Lana School of Public Health, University of	Former Missouri Chapter Sierra Club Mining Chair
Toronto	and current Water Sentinel Volunteer
Kathryn Hubicki	Sandra Kuntz
Dawn Hyde	Montana State University
Monroe County Dept. of Public Health	Alice La Pierre
Leilani Ishaan	Energy Efficiency Coordinator, City of Berkeley
David Jacobs	Daniel Lopez Martinez
University of Illinois at Chicago School of Public	Heidi Lach
Health; National Center for Healthy Housing	Bio-pharma
Marisa Jacott	Joseph LaDou, MD
FRONTRAS COMUNES A.C. (NGO)	University of California School of Medicine, San
Alan Johanns	Francisco
City of San Diego	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