

October 21, 2013

Dr. Howard K. Koh
Assistant Secretary for Health
U.S. 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 $\mu\text{g}/\text{dL}$ 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, 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
 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