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 µg/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 µg/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, Vanesa Albert
Mary Alexander, Chris Alexander
Miguel Angel Alfaro, Centro Ecologista Renacer, Villa Constitucion-Peia, 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
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

Elizab

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 Nessan
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
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 & PMHP Certificate Graduate Nursing Programs, University of Washington

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

Peter Scholz  
Cal/OSHA

Leilani Schwartz  
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 Aukem  
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  
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