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March 19, 2002

The Honorable Christine Todd Whitman
Administrator
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator Whitman,

One of the most important ways that the Environmental Protection Agency protects children from environmental health hazards is through collecting, analyzing, and disseminating relevant data. The Children's Health Protection Advisory Committee (CHPAC) has shown consistent interest in these areas (see, e.g., our October 23, 2000 "Children's Environmental Health Data Needs and Right to Know Blueprint"). Some USEPA's current activities make data-related concerns more important than ever. These include work on internal data structures and the establishment of a Central Data Exchange. In addition we are aware of requests from state agencies and many others for USEPA to better integrate health and environmental data and to collect more and better data about children's environmental health. Furthermore, cooperative efforts with other federal agencies, ranging from pilot environmental health tracking programs to biomonitoring data to the proposed National Children's Study, all present opportunities and challenges for the Agency in terms of its data-related responsibilities.

Therefore, the CHPAC would like to highlight six broad themes that USEPA should emphasize as it moves forward in these areas. We would appreciate a chance in the near future to discuss these concerns with relevant staff. These six themes are:

- EPA's leadership role in addressing data needs
- Integration of health with environmental data
- Integration of data across agencies
- Collection of data about children most at risk
- Improvement of data quality and timeliness
- Dissemination of data and citizen access to information

1. USEPA's Leadership: While other federal and many state agencies also play key roles vis-à-vis environmental health data, USEPA should remain a leader in these areas. It is vital that USEPA makes a long-term commitment of staff and resources to ensure as we move into the 21st century that the Agency meets its environmental and public health responsibilities. It should help move the entire field of environmental health in general, and children's environmental health in particular, forward. For example, USEPA should emphasize programs, such as the High Production Volume and Voluntary Children's Chemical Evaluation initiatives, designed to fill important data gaps (gaps identified in the 10/23/2000 letter include indoor air quality, environmental health impacts from children's products, and the characterization of key environmental health indicators). To do so, USEPA, in partnership with relevant agencies, will need to continue to invest in a broad array of research programs through a variety of means: internal programs, extramural efforts such as the STAR grants and Pediatric Environmental Health Centers of Excellence, and increased efforts with such other concerned parties such as industry and relevant non-governmental organizations (NGOs).

2. Integration of Health with Environmental Data: To better answer environmental health questions and protect children from environmental health hazards, USEPA should improve the integration of health and environmental data, with efforts to examine children's environments holistically, including where children live, learn, and play. Such integration should include methods to better link toxicity, exposure and health outcome data through geocoding, biomonitoring and similar procedures, with an increased emphasis on data useful for epidemiological investigations and guided by appropriate epidemiological expertise. Such work should include both explicit presentations of limitations of such linkages and plans to address such limitations.

3. Integration of Data Across Agencies: USEPA should work with all relevant federal, state, and local agencies (e.g. environment, health, education, transportation, energy) to assure that all data can be standardized and integrated in order to improve public health decision making. Increasingly, new generations of computer hardware and software enable end-users to work with numerous data sets not in the same physical location. Access to integrated data sources – pesticide illnesses, asthma hospitalizations, etc. – could greatly improve environmental health policies and practices. USEPA should invest in the best available information technology and relevant staff expertise. Equally important, such integrated data access should be available not only to the USEPA but also to other governmental agencies and individuals or organizations outside of the government. Furthermore, to ensure that these data are used most effectively to promote children's health, personnel in many state and local health and environmental agencies will require training to assist them in understanding and analyzing data sets traditionally maintained in other departments. For instance health data personnel should become adept at manipulating toxics release inventory (TRI) data. In addition, agencies will need assistance in creating and expanding long-term collaborations between health and environmental agencies.

4. Data Needs to Define Hazards Faced by Children at Highest Risk: The CHPAC's goal is to assist USEPA in understanding how children's environmental health hazards may differ from those of adults. The CHPAC recognizes, however, that some children are at greater risks than others. Previous studies have provided evidence that poor children and children of color, as well as children highly exposed to multiple toxicants, such as the children of migrant farmworkers and those relying on subsistence diets, are often at higher risk for adverse outcomes. Furthermore, investigation of environmental health issues ranging from lead poisoning to pesticide exposure have demonstrated that more accurate exposure characterization, especially for those facing the highest exposures, is critical. Exposure data need to be collected using methods that shed light on differences in exposure levels and mechanisms that may vary with race, occupation, geographic location and income. For these reasons, USEPA should emphasize the collection of data that: a) more accurately characterize the full range and distribution of potential exposures to children b) clearly define which children are most at risk from which hazards, and c) better address the environmental health hazards faced by highest risk children.

5. Data Quality and Timeliness: USEPA should strive to collect child-relevant exposure and health data and to disseminate these data in the most timely manner possible. The agency should remain committed to constantly improving the quality of these data, including ongoing investments in intramural and extramural research programs that emphasize methods development. We recognize that there may be a tension between the mandate to release data promptly and the need to recheck and refine data. USEPA should strive to reconcile these goals, bearing in mind that even incomplete data sets can help improve public health. USEPA should include with any data release a statement of the limitations and uncertainties of those data, together with plans for improving the data.

6. Data Dissemination and Citizen Access to Information: High quality environmental health information can protect and improve the health of children not only through its impact on government policies, but also through consequent changes in business, community, and family practices. This type of information has grown exponentially over the past decade, and its dissemination has been enhanced through current and emerging information technologies, such as the Internet. Often, however, the very communities at highest risk from environmental health hazards have the least access to environmental health data. Furthermore, because such data are often complex and difficult to interpret, and because the Internet also contains much incorrect and/or misleading information, mere access to data does not guarantee the acquisition of useful knowledge. As a priority, USEPA should collaborate with other federal, state, and local agencies, NGOs and the business community to disseminate reliable, easy-to-understand information, with a special emphasis on children most at risk and to communities that have faced barriers to obtaining such information.

Page Four
March 19, 2002

We appreciate the efforts USEPA is making to serve public health through high quality, accessible and integrated environmental health data. We hope our comments will help guide you as you develop a comprehensive strategy to address children's environmental health data needs for the next generation.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Routt Reigart". The signature is fluid and cursive, with a large initial "J" and "R".

J. Routt Reigart, Chair
Children's Health Protection Advisory Committee

cc with attachment:

R. Trovato, Office of Children's Health Protection;
K. Nelson, Office of Environmental Information;
H. Longest, Office of Research and Development.

JRR/pc