

State School Environmental Health Guidelines Meeting

January 31, 2011



 healthy
schools
campaign

clean environment
healthy children
better education

Overview

The Energy Independence and Security Act of 2007 charged the U.S. EPA with the task of issuing voluntary guidelines for states on how to develop and implement environmental health programs for schools. Healthy Schools Campaign (HSC), a non-profit advocacy organization with a mission to advocate for policies and practices that allow all students, teachers and staff to learn and work in a healthy school environment, believes this is an important opportunity to create a body of best practices to improve environmental health and wellness for all students.

On January 31, 2011, HSC convened a meeting of EPA officials, content experts, and representatives from national education stakeholder groups and other federal agencies to discuss the development of EPA's state school environmental health guidelines and provide insight regarding model state school environmental health policies and practices. A summary of the meeting and recommendations to the EPA for moving forward with the state school environmental health guidelines follows in this report.

HSC recommends the EPA issue state school environmental health guidelines that focus on building state capacity to develop and implement statewide policies and programs that support healthy school environments. To accomplish this, the state school environmental health guidelines should include the following:

- Promote environmental state policies that integrate lessons learned and best practices identified through current state level efforts.
- Develop recognition programs to acknowledge efforts at the state and local levels to promote environmental health in schools.
- Provide strong support to state boards of education.
- Foster inter- and intra-agency collaboration.

EPA's Charge

Under the Energy Independence and Security Act of 2007 (EISA), the U.S. EPA was charged with issuing voluntary guidelines for states on how to develop and implement environmental health programs for schools. The state school environmental health guidelines must take into account environmental problems including asbestos, radon, lead, mercury, ventilation choices and technologies, heating and cooling choices and technologies, moisture control, maintenance, cleaning and pest control activities. In addition, the guidelines should provide technical assistance on siting, design, management and operation of school facilities.

Through these guidelines, the EPA will work to help states make the most efficient use of available resources to help communities improve school environmental health. The EPA's goal is to develop reasonable guidelines for state school environmental health programs that support multiple existing state, community and school environmental health policies and programs.

January 31 Meeting Notes

State Policy Best Practices

Many states have implemented state policies to promote healthy school environments. The lessons learned from these state policies can serve as guides to any recommendations that address the development of effective state environmental health policies for schools. The state school environmental health guidelines should include model policies, guidelines for effective state policy development and implementation and case studies addressing these issues.

Indoor Air Quality: The Environmental Law Institute (ELI) identifies key considerations for an effective state IAQ policy in their report “School Indoor Air Quality: State Policy Strategies for Maintaining Healthy Learning Environments.” In the report ELI states “while there is no template or model policy used by states currently, many of the policies adopted so far demonstrate approaches that can help improve indoor air quality in schools.” ELI indicates the following general elements should be addressed in developing an effective school IAQ policy: minimum requirements for school facility conditions that protect the health and safety of adults and children alike; oversight mechanisms to ensure that the policy’s requirements are met; and capacity building measures that enable state agencies to provide resources to assist school districts and local communities in complying with the policy.

School Construction: Thirteen states, including the District of Columbia, have state based green construction standards that address the construction of schools. In promoting school facility policies that address sustainable construction, states have made significant progress by connecting green schools with their fiscal benefits. For example, in Kentucky, a green schools initiative received bipartisan support when the legislature recognized the significant cost savings being generated by local green schools. In a review of high performance school building initiatives, ELI indicates that effective initiatives should develop state capacity to oversee and assist local school building programs; build local capacity to pursue high performance design and construction; establish regulatory requirements related to high performance school design and construction; and provide financial support for school district initiatives.

School Siting: Thirty states have policies affecting the siting of schools and there is great variation across these policies. The Center for Health and Environmental Justice indicates a model policy will address each of the following: “a school siting committee, criteria for categorically excluding certain sites from use, procedures for ensuring meaningful public participation, guidance for thoroughly investigating and evaluating candidate sites, specific remediation guidelines for cleaning up contamination found on candidate sites, and guidelines to facilitate remediation of sites that have substantial contamination.” In addition, the EPA recently released a draft of school siting guidelines that are intended to assist communities in making the best possible decisions when it comes to determining where a school should be built.

Green Cleaning: States across the U.S. have begun protecting children’s health by requiring green cleaning in schools. Currently, nine states have green cleaning laws for schools. An effective green cleaning policy will state what products are to be covered by the policy; define environmentally preferable products, often referring to third party certifications; articulate a process for stakeholder engagement in developing the regulations; provide a process for reviewing and updating the regulations and include guidelines for outreach and training.

Pest Control: Thirty-five states have adopted policies that address pesticide use at schools, but these policies vary in strength. Beyond Pesticides identifies six states with model policies for school pest control: Connecticut, Massachusetts, Oregon, New Jersey, California and Maine. Key criteria of an effective pest control policy include requiring adoption of an IPM program; prohibiting when and where pesticides can be applied; requiring signage for application of pesticides; requiring written notification prior to administration of pesticides; and requiring buffer zones around school facilities in which pesticides cannot be sprayed.

State Policy Maps

School Construction

States with LEED Initiatives Addressing School Construction



Green Cleaning

States with Green Cleaning Policies



School Siting

States with School Siting Policies



Pest Control

States with Pest Control Policies



The Development of Effective State Policies:

Key findings for EPA to consider when developing model state policies include the following:

- Policies that are developed with the engagement of school stakeholders are more likely to be successfully implemented than those that are developed without input from these important constituencies.
- Mandates, even those that are unenforced or include opt out options, can lead to more effective policy implementation than can voluntary guidelines alone. Policies that include opt out clauses with public disclosure are politically acceptable to policymakers.
- Interagency cooperation is integral to the successful design and implementation of environmental health policy. Promoting collaboration and creating opportunities for NGO engagement would support more comprehensive program development and improved communication with schools.
- Policies that build off of existing school policies (e.g., school improvement plans, school report cards, inspection protocol) are more likely to be adopted and implemented.
- Understanding current trends in education policy is an important step in identifying additional policy handles.
- Recognition programs can be important tools for changing school policy and practice, and there are good examples of other federal agencies that have successfully implemented these types of programs.



Barriers to School Environmental Health Guidelines

Meeting attendees identified barriers encountered by states and schools that the EPA should consider when developing the state school environmental health guidelines. Suggestions for strategies to address these barriers were identified and should be considered by the EPA in development of the guidelines.

Barrier	Strategies for Addressing Barriers
States and schools face financial constraints	<ul style="list-style-type: none"> • Use the CDC Coordinated School Health Program as a model for supporting state activities. • Explore the possibility of providing financial resources through the Department of Education • Highlight the financial benefits of school environmental health practices, including green school construction, green cleaning, and good IAQ. • Identify private streams of funding, such as energy service companies, and provide states with guidance on how to utilize these untapped resources. • Support convergence partnerships that bring private funders together in support of school environmental health issues.
States and schools lack the knowledge about environmental health issues and best practices	<ul style="list-style-type: none"> • Connect schools with existing resources produced by the EPA • Identify strategies for effective communication that enable the EPA to bring technical expertise to states.
States and schools have inadequate staffing to implement guidelines	<ul style="list-style-type: none"> • Work with the Department of Education to ensure ESEA emphasizes the health and learning connection in professional development. The ESEA Blueprint has a strong emphasis on professional development with proposed funding and resources to improve the educational workforce. • Emphasize the importance of proper training to address environmental health issues.
States and schools stigmatize the name “EPA”	<ul style="list-style-type: none"> • Collaborate and engage with the Department of Education to promote guidelines.
States and schools fear being held liable	<ul style="list-style-type: none"> • Use caution when selecting the guidelines’ language and avoid words, such as mold, that raise red flags. • Encourage schools to bring insurance regulators to the table in the development of state environmental health policies
States and schools face competing priorities, including improving test scores	<ul style="list-style-type: none"> • Emphasize the connection between health and academic achievement • Highlight how improvement environmental health can improve test scores/absenteeism/etc.

Recommendations for Moving Forward:

Be specific: The guidelines should establish specific and concise roles for individuals and agencies. For example, in New York, the state policy addressing school IAQ specifically identifies the parties responsible for conducting IAQ inspections. The guidelines should not only be specific about the roles for agencies and individuals, but should also be specific about the consequences for not meeting policy requirements. In addition, policies are most effective when a tangible, desirable outcome is identified. Specific outcomes, such as reduced bus and car idling on school grounds, can both motivate stakeholders and promote action.

Promote collaboration: The guidelines should promote collaboration between state agencies and non-governmental organizations. Non-governmental organizations have multiple resources that can provide needed assistance to state efforts to promote environmental health. In addition, the guidelines should promote collaboration between federal agencies, including the EPA and Department of Education, and should also promote intra-agency collaboration within the EPA.

Connect to existing infrastructure: The guidelines need to connect to existing infrastructure, programs and policies. Numerous models for state environmental health policies exist and it is important for the EPA to build upon these existing models and promote policies that utilize best practices for policies and programs. In addition, the EPA should connect states with existing resources and programs available through the EPA.

Identify effective champions: The guidelines should emphasize the importance of identifying and involving stakeholders that can serve as environmental health champions at the state and local level. Local community organizations can provide valuable assistance for identifying champions and identifying individuals that have successfully implemented environmental health programs and policies. Effective champions can also serve an integral role in building local support for environmental health issues.

Tailor messaging: The guidelines should promote environmental health messaging that is tailored to different target audiences. Identifying the interests and concerns of the target audience will be critical to developing messaging that builds support for environmental health issues. For example, emphasizing the connection between improved indoor air quality and reduction in absenteeism from asthma can be an effective message to generate support among school administrators.

Establish accountability: The guidelines should encourage states to establish a mechanism for accountability and to be specific about requirements and consequences for not meeting these requirements. It is important for each state to make their own decision about which agency should be held responsible for following the guidelines. States should examine which agency (e.g. State Department of Health, State Department of Agriculture, State Department of Education) is most actively involved in school environmental health issues and assign responsibility for the guidelines to this agency.

Recognize significant accomplishments: The guidelines should promote state recognition of school districts that model strong environmental health practices and policies. In addition, the EPA should consider establishing a federal recognition program to acknowledge schools and/or districts that exemplify practice that promote healthy school environments. Federal recognition programs serve as a good model of programs that can promote change with minimal resources and are an excellent model for engaging the school community.



The Establishment of a Recognition Program

Providing schools with recognition for their efforts to promote healthier school environments can be a highly effective strategy for motivating schools to initiate and support change. Existing voluntary, federal recognition programs serve as excellent models for the EPA to consider when determining how to motivate states and schools to implement the state environmental health guidelines. During the meeting, the USDA's HealthierUS Schools Challenge and the Department of Education's Blue Ribbons Schools program were examined in order to identify model policies and lessons learned from these programs. Descriptions of each program follows:

USDA's HealthierUS Schools Challenge: The HealthierUS School Challenge was established to recognize schools that are creating healthier school environments through their promotion of good nutrition and physical activity. Four levels of superior performance are awarded: Bronze, Silver, Gold, and Gold Award of Distinction. The overarching goal of the HUSSC is to improve the health of the Nation's children by promoting healthier school environments.

Blue Ribbon Schools Program: The Blue Ribbon Schools Program honors public and private elementary, middle and high schools whose students achieve at very high levels or have made significant progress and helped close gaps in achievement, especially among disadvantaged and minority students. The program is part of a larger Department of Education effort to identify and disseminate knowledge about best school leadership and teaching practices.

These recognition programs are voluntary and, while the HealthierUS Schools Challenge has a small monetary award associated with the recognition, the Blue Ribbon Schools Program does not. Both recognition programs have succeeded in getting the attention of state and local officials by identifying a key federal or state level spokesperson. For example, state politicians are always invited to attend ceremonies to present the USDA HealthierUS School Challenge Award and the Blue Ribbon Award.

In addition, the recent announcement of the Green Ribbon Schools program could provide the EPA with the opportunity to recognize schools that follow the state environmental health guidelines. By recognizing schools that are creating healthy and sustainable learning environments and teaching environmental literacy, this program will support the EPA's charge of developing state school environmental health guidelines.

Final Thoughts

The state school environmental health guidelines provide an ideal opportunity for the EPA to build on the successes and lessons learned from existing state policies and develop model state policies to support healthy school environments. State school environmental health guidelines that focus on building state capacity to develop and implement statewide policies and programs that support healthy school environments will be of great value to state agencies.

In order to accomplish this, it will be important for the EPA to develop guidelines that provide strong support to state boards of education; foster inter- and intra-agency collaboration; integrate lessons learned and best practices identified through current state level efforts; and consider the development of a recognition program to acknowledge efforts to promote environmental health in schools. HSC and the meeting participants look forward to continuing to work with and support the EPA's efforts to develop and implement these guidelines.

Special Thanks

We would like to thank the American Federation of Teachers for hosting this meeting and we would also like to thank our meeting attendees:

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Kara Belle	<i>U.S. EPA</i>
Tobie Bernstein	<i>Environmental Law Institute</i>
Yasmin Bowers	<i>American Association of School Administrators</i>
Dana Carr	<i>U.S. Department of Education</i>
Annelise Cohon	<i>National Education Association Health Information Network</i>
Michelle Curreri	<i>U.S. EPA</i>
Cathy Davis	<i>U.S. EPA</i>
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Rachel Gutter	<i>U.S. Green Building Council</i>
Lindsay Handelsman	<i>U.S. EPA</i>
Karen Johnson	<i>HealthCorps</i>
Aba Kumi	<i>U.S. Department of Education</i>
Katherine Pruitt	<i>American Lung Association</i>
Audrey Rowe	<i>U.S. Department of Agriculture</i>
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Carol Stroebel	<i>Children's Environmental Health Network</i>
Elizabeth Walker	<i>National Association of State Boards of Education</i>
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Healthy Schools Campaign

Healthy Schools Campaign (HSC), an independent not-for-profit organization, is a leading authority on healthy school environments, and a voice for people who care about our environment, our children, and education. Since beginning as a local project in Chicago in 2002, HSC has grown into a vibrant national organization with diverse strategic partnerships and effective outreach to schools, communities, and policy-makers. As we work for policy change and market transformation on a national level, we continue to pioneer new strategies through our Chicago programs, including projects focused on environmental justice, green cleaning, school nurse leadership, community-based efforts to combat health disparities, and many others. These projects provide lessons that can help shape our national work.



