



Children's
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Children's Environmental Health Network and partners call for inclusion of environmental health in HHS Child Care and Development Fund (CCDF) health and safety regulations

WASHINGTON DC – Leading environmental health and child care public interest organizations today urged HHS to include environmental health factors – such as exposure to lead – in the proposed changes to the Child Care and Development Fund (CCDF) regulations.

The groups -- the Children's Environmental Health Network (CEHN), the National Center for Healthy Housing (NCHH), the National Resource Center for Health and Safety in Child Care and Early Education (NRC), the Center for Environmental Research & Children's Health (CERCH), and the Institute of Neurotoxicology & Neurological Disorders (INND) -- strongly agreed with HHS on the importance of healthy and safe early environments, including child care, and the need for updated regulations. The groups noted that a child's environment -- including but not limited to the chemicals a child encounters before birth, at home, and at child care and school -- has profound effects on a child's health, development and ability to learn. Environmental exposures play a role in the cause, prevention, or mitigation of today's pediatric epidemics of obesity, asthma, learning disabilities, and autism. Rebecca Morley, NCHH Executive Director said "Children should not be exposed to environmental toxicants that may result in life-long harm, especially by the very places entrusted with their development."

Yet, the groups contend that these environmental considerations are not adequately addressed in the original HHS proposal.

CEHN and its partners urged the Department to incorporate key environmental health considerations in the regulations. Proposals included require a blood lead screening result when children enroll in a CCDF-funded program and blood lead screening at the ages of 12 months and 24 months if the child is enrolled prior to reaching that age. They recommended that an elevated blood lead level (EBLL) be reported under this program as a serious injury unless the child's caregiver's home or child care facility has been shown not to be the source of the exposure.

As stated by the Centers for Disease Control and Prevention, no safe level of lead exposure in children has been found. Childhood lead exposure, even at low levels, remains a critical public health issue.

Their comments also called the regulations to address basic pediatric facts about child health and development, such as:

- Children are more susceptible and more vulnerable than adults to toxic chemicals.
- Children are growing. Pound for pound, children eat more food, drink more water and breathe more air than adults. Thus, they are often more exposed to substances in their environment than adults.
- Children have are different from adults in how their bodies absorb, detoxify and excrete toxicants.
- Children's systems, including their nervous, reproductive, digestive, respiratory, and immune systems, are developing. When these systems are forming, there are periods of increased vulnerability to toxic substances that disrupt normal developmental processes. Exposure to toxicants during these periods may result in irreversible damage when the same exposure to a mature system may result in little or no damage.
- Children behave differently than adults, leading to a different pattern of exposures to the world around them. For example, they exhibit hand-to-mouth behavior, and spend hours close to the ground where there may be more exposure to toxicants in dust, soil, and carpets as well as low-lying vapors such as radon, mercury vapor or pesticides.

“We appreciate the opportunity to comment on these important regulations and we commend HHS for its leadership in assuring healthy and safe child care settings,” said CEHN Executive Director Nsedu Obot Witherspoon. “We look forward to updated regulations that reflect current science by recognizing and protecting children’s unique vulnerabilities and exposures in their environments. We share HHS’s goal of creating early environments that are safe, healthy, and allow all children to thrive.”

CEHN’s national Eco-Healthy Child Care® program brings basic concepts and practical steps for healthier environments to a professional community -- child care providers -- who have a tremendous impact on the health of the environments in which millions of U.S. children spend a major portion of their time. EHCC offers a unique endorsement and marketing model for participating child cares, as well as training and technical assistance.

CEHN, a national non-profit whose mission is to protect the developing child from environmental hazards and promote a healthy environment, has been working for more than 20 years in the areas of child-protective policy, education, and the support of pediatric peer-reviewed research.

Read the [submitted comments](#)