



November 9, 2021

Re: EPA-HQ-OA-2021-0403

The Association of Public Health Laboratories (APHL) appreciates the opportunity to comment on the *Draft FY 2022 – FY 2026 EPA Strategic Plan*. APHL is a member-service association that works to strengthen laboratory systems serving the public's health in the United States and globally, representing state, local, and territorial governmental public health laboratories in the United States.

APHL appreciates the plan's focus on climate and environmental justice. Investments to ensure equitable access to environmental testing and data are necessary to address immediate concerns such as contaminants of concern, air quality and response and resilience to climate change. The pandemic has laid bare years of underinvestment in public health. Congress and agencies have responded with significant investments in improving infectious disease testing capacity, data systems and consideration of communities that have been underserved by the US government. Environmental health however, has suffered perhaps even more underfunding. The potential inability of the US environmental health laboratory systems to adequately respond to ongoing and potential environmental health threats is a critical concern. In particular, APHL is concerned about environmental health laboratory workforce shortages, radiological preparedness and lack of an agile coordinated response to contaminants of concern. Transformational plans and investments must be made to bring us to an acceptable state of readiness.

*Cross-Agency Strategy 4: Strengthen Tribal, State, and Local Partnerships and Enhance Engagement* emphasizes the shared responsibility for environmental protection between EPA and jurisdictional governments. APHL and our member laboratories have a long and productive relationship with EPA's regional laboratories including their input into the work of APHL committees and technical support at the regional level. We encourage EPA to increase funding to these laboratories, including for vital field investigations, sample analysis and training. However, to fully develop agile, environmental health laboratory capacity that can be responsive to community needs, requires direct foundational investments in state and local governmental environmental laboratories. Local and state governments are the closest to "meeting communities where they are." However, our member laboratories would currently be limited in our capacity to assist with specific projects or emergencies if requested. For example, while EPA turned to APHL and our member's expertise in the development of quality assurance materials for EPA's citizen science project, and our member laboratories would often be a resource of first choice for communities for these concerns, an appropriate response would be limited by workforce and capacity constraints.

**APHL recommends that EPA further support communities with investment in state and local testing capacity to fulfill the goals of the strategic plan.** The pandemic has shown the importance of understanding, coordinating and supporting federal, state and private laboratory response to public health concerns. Minimal funding for EPA's Environmental Response Laboratory Network (ERLN) functions, underutilization of the Water Laboratory Alliance (WLA), low staffing at EPA regional laboratories, and no federally funded capacity building at state and local environmental health laboratories should be addressed as EPA implements this strategic plan. Private laboratories may be able to sustain basic contract testing capacity through fees. However, public health laboratories have a very different mission and funding structure. While they may provide some contract testing capacity, their fundamental mission is to provide flexible testing capacity based on immediate public health needs in the community they serve. For this, they need to be able to maintain modern testing capacity and be able to proactively address, for example, contaminants of concerns and microbiological testing on environmental matrices. While there is federal funding available for capacity building at state and local laboratories through CDCs Epidemiology and Laboratory Capacity and the Laboratory Response Network for clinical samples, FDA's Laboratory Flexible Funding Model and the Food Emergency Response Network for food testing laboratories, there is no similar mechanism for capacity building for testing environmental matrices. While many of our members support ERLN

capacity, the reliance on a reimbursement mechanism for funding is a serious limitation to our members' ability to invest in staff, modernize equipment and facilities.

**APHL recommends EPA fund training to ensure EPA and other environmental health laboratories have the expertise and staff capacity to address environmental health threats.** Like much of public health, the public health laboratory workforce has shown significant attrition over years due to federal and state level budgetary and staffing decisions. The pandemic has compounded the crisis. In some specialties, such as next generation sequencing and bioinformatics the need is expanding more rapidly than current training is able to support. In other specialties, such as radiochemistry<sup>i</sup>, the high degree of specialization, decrease in training programs, plus underfunding, has eroded the workforce to a critical level such that knowledge retention is untenable, and there is limited ability to respond to anything beyond a very contained radiological incident. While WLA provides some training, significantly increased investment is needed in outreach, training and improving resources such as the Water Contamination Information Tool.

**APHL recommends investments in data systems pertaining to environmental health.** The pandemic has clearly shown us that to be able to address health and equity needs, data needs to be timely and accessible enough to be actionable. Modernized, interoperable data systems are key to improving the utility of environmental health data. While seamless flow of data between state, local and federal agencies is important, data flow between agencies is also important, so environmental, clinical and demographic data can be correlated and federal investments maximized.

**APHL recommends EPA provide dedicated specific resources to fulfill their role in One Health and in any proposed interagency One Health frameworks.** Given the strategic plan's emphasis on the need for transdisciplinary, collaborative, multisectoral approaches to optimize health, APHL encourages EPA to elevate and invest in the agencies One Health work, similar to the approach at CDC<sup>ii</sup> and FDA<sup>iii</sup>. EPA is essential to an across federal government One Health approach, to address concerns that cross human, animal and environmental health boundaries. EPA's mission speaks directly to this, and has done vital work in this realm, including recent involvement in the FDA/USDA National Antimicrobial Resistance Monitoring System and wastewater surveillance.

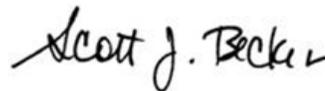
We look forward to working with EPA to implement the strategies outlined in the plan. Please contact Erin Morin, Associate Specialist Environmental Health (erin.morin@aphl.org) with any questions.

Sincerely,



Shane Olund

Chair, Environmental Laboratory Science Committee



Scott Becker

Chief Executive Officer

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<sup>i</sup> [https://cdn.ymaws.com/www.crcpd.org/resource/collection/E68ABFB4-8E23-4B45-AD75-EDB66F4A055A/POS\\_ER-T\\_19\\_NextGen.pdf](https://cdn.ymaws.com/www.crcpd.org/resource/collection/E68ABFB4-8E23-4B45-AD75-EDB66F4A055A/POS_ER-T_19_NextGen.pdf)

<sup>ii</sup> <https://www.cdc.gov/onehealth/index.html>

<sup>iii</sup> <https://www.fda.gov/science-research/fda-grand-rounds/pandemic-and-call-action-one-health-fda-one-health-initiative-06112020-06112020>