



June 14, 2022

Dear HHS Environmental Justice Working Group,

The Association of Public Health Laboratories (APHL) appreciates the opportunity to provide comment on the *2022 HHS Environmental Justice Strategy and Implementation Plan Draft Outline*. APHL's members, state, local and territorial governmental public health laboratories, provide surveillance, and response testing for infectious disease, environmental health and food safety threats. The COVID-19 pandemic has starkly shown that lack of access to quality, affordable testing, can exacerbate health inequalities. Timely, quality, accessible, laboratory data is vital to a comprehensive understanding of environmental exposures such as lead, radiation, and emerging contaminants. APHL encourages HHS to involve laboratory stakeholders to consider how to address potential gaps in laboratory testing for these, and other critical environmental justice issues.

Do the *Priority Actions* capture the urgent, environmental justice issues of today?

Support research that explores the multiple and complex factors contributing to minority health disparities, including but not limited to environmental factors acting independently or dependently across multiple social levels.

Community level data is critical to understanding environmental exposure inequities. One expanding program is the National Biomonitoring Network (NBN), a collaboration of federal, regional, state and local laboratories that measure exposure to chemicals, for public health surveillance and response to environmental emergencies. The network aims to advance biomonitoring science, encourage its use in addressing environmental health questions, and ensure quality practices to help ensure comparable biomonitoring data. Investments in these programs will allow public health laboratories to better assist communities concerned about exposure. Community partnership grants that support laboratory involvement may also prove helpful.

Support the spectrum of community engaged research including community-based participatory research and community led research. Additionally, strengthen authentic community engagement in planning, implementing, evaluating, and disseminating effective interventions for diseases disproportionately affecting disadvantaged communities and vulnerable populations.

While our member laboratories and agencies such as CDC can generate community data, citizen science also plays a role in combatting environmental injustice. Important tools developed by EPA include a [quality assurance handbook and guidance documents](#) which are designed to help communities ensure their data is of sufficient quality to be relied on for decision-making. Including opportunities and support for meaningful citizen science can assist in providing justice and resilience in communities, along with helping rebuild trust with government agencies.

Fund and implement training and workforce development programs that build skills and careers related to climate, natural disasters, environment, clean energy, clean transportation, housing, water and wastewater infrastructure, and legacy pollution reduction.

The public health laboratory workforce, like much of the public health sector, has been facing a slow-rolling staffing crisis that has been made acutely worse from the strain of the COVID-19 pandemic. These needs are particularly large in informatics and some subspecialties such as radiochemistry. While pandemic response investments may provide some staffing relief, developing a diverse laboratory workforce that can adequately address environmental justice will take broader efforts and support. APHL encourages the consideration of environmental laboratory testing, radiochemistry, informatics and leadership in future training and workforce development programs.

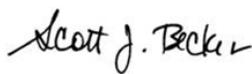
Develop environmental justice training programs for Federal staff, primary health care and public health professionals, and policy and other decision-makers.

APHL strongly supports the development of training programs and resources that educate public health professionals on understanding and helping tackle environmental justice. We encourage the inclusion of how climate change and diversity equity and inclusion intersect with environmental justice. These programs will also help take the burden of education off of those in affected communities.

What research methods, research questions, and data tools should HHS use to address environmental justice and social determinants of health?

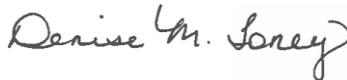
The COVID-19 pandemic revealed our antiquated public health data infrastructure, and highlighted the lack of data for minority, under-resourced and historically-disadvantaged communities. CDC's Data Modernization Initiative is beginning to make transformational investments in data systems for epidemiology, vital statistics, and laboratory reporting. Environmental health is yet to see the critical investments in testing and data that the pandemic has provided for infectious disease. Investments in environmental health data transfer, storage, analysis, in coordination with EPA and other agencies could go a long way to bridging these critical data gaps.

APHL applauds the establishment of an Office of Climate Change and Health Equity in HHS and hope they, along with the White House Environmental Justice Advisory Council, enable cross agency coordination on this important work. We appreciate HHS's focus on this area and would be happy to discuss our comments further. For any questions, please contact Kuki Hansen, Manager, Regulatory and Public Policy (kuki.hansen@aphl.org).



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