

September 5, 2023

The Honorable Bernard Sanders Chair, Health, Education, Labor, and Pensions Committee U.S. Senate Washington, DC 20510

The Honorable Bill Cassidy, MD Ranking Member, Health, Education, Labor, and Pensions Committee U.S. Senate Washington, DC 20510

The Honorable Robert P. Casey, Jr. Member, Health, Education, Labor, and Pensions Committee U.S. Senate Washington, DC 20510

The Honorable Mitt Romney Member, Health, Education, Labor, and Pensions Committee U.S. Senate Washington, DC 20510

Dear Chair Sanders, Ranking Member Cassidy, Senator Casey, and Senator Romney,

The National Environmental Health Association (NEHA) represents nearly 7,000 environmental public health professionals in governmental, private, academic, and uniformed services sectors in the U.S., its territories, and internationally. We are the profession's strongest advocate for excellence in the practice of environmental health and thought leaders in delivering on our mission to build, sustain, and empower an effective environmental health workforce.

We shepherd one the most vital next generations of professionals—the environmental public health professional. These professionals are on the front line protecting communities from harmful impacts in our environment, including animal-borne disease, water contamination, air pollution, hazardous materials, contaminated food, and environmental disasters.

On behalf of the environmental health profession, we offer the following comments to the bipartisan discussion draft of the U.S. Senate Health, Education, Labor, and Pensions Committee to reauthorize the Pandemic and All-Hazards Preparedness Act (PAHPA).

We believe that environmental health professionals play a critically important role in public health preparedness, response, and recovery that serves to mitigate or reduce instances of preventable injury and illness that often occur during and after emergencies and disasters. We also acknowledge that there is wide jurisdictional variability in the recognition, adoption, and implementation of recommendations regarding the role of environmental health in public health preparedness, including federal and state, local, tribal, and territorial (SLTT) jurisdictions.

We recommend the complete integration of environmental health into public health emergency preparedness to promote the highest level of health and safety for individuals and communities affected by disasters. To accomplish this goal, we recommend the following:

- Integrate environmental public health into emergency preparedness, response, and recovery planning and exercising.
- Identify specific environmental public health-related functions and deliverables in Public Health Emergency Preparedness (PHEP) grant capabilities that can be used to support personnel training and other preparedness activities.
- Support the development of more timely, effective, and targeted responses to environmental public health hazards in disasters by providing practical function- and skills-based training for environmental public health professionals on the roles, functions, and priority activities that environmental public health programs should lead, participate, and/or support.
- Focus on collaborative planning and foster communication among environmental health, public health, private sectors, and other personnel to address the environmental health component inherent in emergency response and recovery operations. Additionally, encourage the sharing of environmental public health knowledge with non-environmental health personnel.
- Collaborate with federal, state, and local governments to clarify the role of environmental public health personnel in the staffing of emergency operation centers, serving as members of specialized environmental public health strike teams, or participating in emergency preparedness and response task forces.

We would like to offer comments on specific sections of the PAHPA reauthorization:

Sec. 105: Enhancing Domestic Wastewater Surveillance for Pathogen Detection

We support the committee's interest in enhancing wastewater surveillance for pathogen detection at SLTT environmental public health departments. Wastewater surveillance, which measures pathogen levels in wastewater, is vital in evaluating community-level trends that can be used to complement traditional surveillance and interventions. During the COVID-19 pandemic, the Centers for Disease Control and Prevention launched the National Wastewater Surveillance System to coordinate wastewater surveillance programs that were being implemented by SLTT environmental public health departments. Continued support of such efforts is critical to ensuring effective pathogen detection.

Sec. 106: Reauthorization of Mosquito Abatement for Safety and Health Program

We support the reauthorization of the Mosquito Abatement for Safety and Health Program, as well as language that would permit award recipients to use the funding to provide continuing education and training for individuals carrying out activities related to the program. We also advocate for dedicated appropriations to support this program.

Sec. 201: All-Hazards Emergency Preparedness and Response

The past 3 years have demonstrated the need for Congress to support robust, fully funded environmental public health infrastructure with sustainable annual resources toward the ultimate goal of minimizing dependency on supplemental emergency funding. Continued support for environmental public health infrastructure will minimize any future pandemics or mitigate future natural or human-made disasters.

Modernizing our federal and SLTT public health data and surveillance systems will allow us to rapidly detect and respond to public health threats domestically and globally. Foundational improvements to the nation's environmental public health infrastructure and continued investments in public health data modernization are necessary. Furthermore, continuing support is needed for SLTT core public health activities, including sanitary and phytosanitary efforts, food safety, disease surveillance and epidemiology, laboratory services, policy development and support, and preparedness and response.

The federal government must realize that public health emergencies affect each community, state, territory, or region differently. SLTT health agencies prepare for environmental public health threats by understanding the unique geography and demographics of their communities while recognizing the interconnected nature of their natural and built environments. These agencies must consider geographic vulnerability, including coastal areas, wildlands, and forest interfaces, as well as rural and island considerations. With the support of relevant federal agencies, SLTT public health

agencies can continue to assess their distinct vulnerabilities—both locally and regionally—and prepare for, respond to, and recover from public health emergencies.

We support the need for four separate but equally essential funding streams:

- Increase baseline environmental public health infrastructure funding via annual appropriations that support the modernization of core public health data systems and the core functions of public health, such as daily assessment, surveillance, monitoring, testing, and vaccinations.
- Establish a mandatory environmental public health infrastructure fund outside of the annual appropriations process to provide environmental public health jurisdictions with predictable and sustained funding.
- Establish adequate and appropriate all-hazards preparedness funding via PHEP and the Hospital Preparedness Program of the Administration for Strategic Preparedness and Response, which strengthens our country's readiness and capabilities by improving emergency operations coordination, emergency public information sharing, mass care, medical surge, and medical countermeasure dispensing and administration.
- Establish rapid and flexible response funding that allows for the necessary expansion of core environmental public health and response capabilities and activities during an emergency.

We appreciate your time and efforts to improve and strengthen PAHPA. If you have any questions or comments, contact Doug Farquhar, director of Government Affairs, at dfarquhar@neha.org.

Sincerely,

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