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October 11, 2019

Comments on EPA's Request for Nominations to the Children's Health Protection Advisory Committee (CHPAC)

Comments submitted via email to EPA_CHPAC@icfi.com
CC: Nica Louie, Designated Federal Officer, at Louie.nica@epa.gov

The following comments are being submitted by the University of California, San Francisco (UCSF) Program on Reproductive Health and the Environment (PRHE). We have no direct or indirect financial or fiduciary interest in the manufacture or sale of any chemical that would be the subject of the deliberations of this Committee.

In summary, our comments address the nominations of 4 individuals for the Children's Health Protection Advisory Committee.

Background

We appreciate the opportunity to nominate qualified candidates to serve as members on EPA's Children's Health Protection Advisory Committee. The CHPAC is tasked with providing independent advice to the EPA Administrator on a broad range of environmental issues affecting children's health.

The objectives of the CHPAC are to provide recommendations on:
Policy issues associated with regulations, economics, and outreach/ communications to address prevention of adverse health effects to children, and improve the breadth and depth of analyses related to these efforts and
Critical policy and technical issues relating to children's health.

We encourage EPA to consider the following when considering nominations:

The role of CHPAC members in supporting the mission of EPA in protecting human health and the environment.

EPA has a professional and legal duty to select committee members who will provide credible and independent scientific analysis and advice free from true conflicts of interest or a strong bias toward the perspective of regulated industries that may have more of a vested interest in minimizing EPA's regulation of hazardous materials and products than in protecting children's health.

The need for transparent and effective disclosure policies that are strictly enforced.

These disclosure and conflict policies play an essential role in protecting EPA and committee work products and must be strictly enforced and routinely addressed to ensure the quality Committee work products.

The need for representation from directly impacted, susceptible, vulnerable, and/or highly exposed populations.

We urge the Agency to not only seek representatives that have *specific scientific expertise* in the relationship of chemical exposures to women, children, and other potentially exposed or susceptible subpopulations, but to incorporate a broader and more inclusive definition to capture representation from individuals with diverse knowledge sources that represent unique perspectives to these critical issues. EPA has encouraged “citizen science” but then has then erected expertise barriers that essentially prevent those with expertise about impacted communities but perhaps without certain privileged credentials (i.e., holding a postgraduate degree) from taking part in critical discussions. There are many examples of successful implementation of such approaches, which have demonstrated that incorporating knowledge resources outside of traditional academics and science fields can greatly enrich the research and policy process.¹

Nominations

1. Nominations of 4 individuals to serve on the CHPAC.

We are pleased to nominate the following 4 candidates. We believe these individuals are extremely well-qualified and meet the criteria, with considerable experience and expertise that would contribute valuable service to EPA.

1. Dr. Veena Singla
2. Dr. Virginia Rauh
3. Dr. Kristi Pullen Fedinick
4. Maureen Swanson, MPA

Nomination #1: Dr. Veena Singla

Statement of Interest

My research and professional work aim to translate the latest science into appropriate evidence-based policies for public health protection. Scientific advances include better understanding of biological susceptibilities and the social determinants of health for children, and how these factors interact to affect health and contribute to health disparities, especially for low socio-economic status populations. As a member of the CHPAC, I could provide important perspectives on how EPA could integrate current science, technical and methodological advances to inform its consideration of children’s health.

¹ Anderson, B.E., Naujokas, M.F. and Suk, W.A., 2015. Interweaving knowledge resources to address complex environmental health challenges. *Environmental health perspectives*, 123(11):1095-1099.

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Dr. Singla, Ph.D., is the Associate Director of Science & Policy at the Program on Reproductive Health and the Environment at University of California, San Francisco. She worked as a postdoctoral teaching fellow at Stanford University and as an adjunct faculty member at the University of San Francisco. She holds a bachelor's degree from the University of California, Berkeley, and a PhD in cell biology from the University of California, San Francisco. Her work focuses on informing policies with the most current scientific principles and data to reduce and prevent harmful environmental exposures. Her research focuses on indoor environmental quality and how exposure to multiple chemicals affects health outcomes, especially for vulnerable populations such as workers, pregnant women and young children. She specializes in the communication of complex scientific information at the intersection of research and policy and has led work on groundbreaking policies which attempt to establish frameworks for safer chemical evaluation and substitution. If chosen, her expertise of the intersection of federal-level chemicals policy and vulnerable populations would contribute a valuable interdisciplinary perspective to the CHPAC. ^{2,3}

Nomination #2: Dr. Virginia Rauh

Statement of Interest

As a public health professional and academic researcher for almost 30 years, I am extremely interested in being appointed to the Children's Health Protection Advisory Committee (CHPAC), and very willing to contribute my time to the regular meetings and responsibilities. I would bring to the committee more than 25 years of experience in the field of public health, focused on the areas of environmental hazards and child development. As an epidemiologist and Deputy Director of the Columbia Center for Children's Environmental Health for 20 years, I have conducted research on the role of early and continuing ambient environmental exposures on brain, behavioral and clinical outcomes of low-income, minority and disadvantaged children with proximity to hazardous exposures. I have worked tirelessly to identify the environmental conditions that are associated with health adversity, and to increase community awareness about risk prevention. Currently, I am an investigator on an NIH ECHO study based in South Dakota targeting tribal children's environmental health. I am particularly interested in the protection of low-resource populations of children with excess exposure to contaminated environmental conditions with potentially long-term adverse consequences for health and well-being.

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² Singla V, Sutton P, Woodruff TW. (2019) The Environmental Protection Agency Toxic Substances Control Act Systematic Review Method May Curtail Science Used to Inform Policies, With Profound Implications for Public Health. *Am J Public Health*. doi: 10.2105/AJPH.2019.305068

³ Koman, P.D., Singla, V. I., Lam, J., & Woodruff, T. J. (2019). Population susceptibility: A vital consideration in chemical risk evaluation under the Lautenberg Toxic Substances Control Act. *PLoS Biology*. <https://doi.org/10.1371/journal.pbio.3000372>

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Dr. Virginia Rauh is Professor and Vice Chair of the Heilbrunn Department of Population and Family Health, Mailman School of Public Health, Columbia University. She is a developmental epidemiologist (Harvard School of Public Health, ScD) and social worker (Smith College School for Social Work, MSW) by training, whose work focuses on the long-term health effects of social and physical environmental exposures on child and youth health, particularly with respect to socioeconomically disadvantaged and minority populations. She completed post-doctoral work in psychiatric epidemiology and received an NIH Career Development award (K award) to study the effects of prenatal and postnatal psychosocial exposures on child neurodevelopment. She served as the Deputy Director of the Columbia Center for Children's Environmental Health for 20 years, working closely with community partners to communicate scientific findings and educate local health providers. Grounded in neuroscience, she has studied the combination of exposure to social and physical stressors, including adverse childhood experiences, the built environment, and chemical air pollutants on pregnancy, maternal, child and family health. Dr. Rauh has been principal investigator on more than 25 major research projects, including studies of the impact of secondhand tobacco smoke on child neurodevelopment and brain abnormalities (MRI, fMRI), a randomized intervention trial for low birth weight infants, a multi-site study of lifestyles in pregnancy, a study of developmental outcomes of children born to inner-city adolescent mothers, a study of the effects of ambient air pollutants on pregnant women and their children, and a study of links between race, stressors, and preterm birth, among other scholarly research studies. She is the author of more than 150 publications in peer-reviewed journals. Dr. Rauh has received numerous awards and has served on many national committees including the Scientific Advisory Board for the Environmental Protection Agency, NIH study sections, and expert panels for EPA, NIEHS, NIMH, and NICHD. Most recently, she received the Columbia University Dean's Award for Leadership (May 2019) for outstanding service to the academic and wider community. In addition to managing her NIH research grant portfolio, she currently directs CHILD (the Columbia Child Health Initiative for Learning and Development), and is Director of Trauma-Free NYC, a New York City-wide partnership for trauma informed action and training. This latter partnership addresses adverse childhood experiences (ACEs) as well as populations with historical trauma.

Dr. Rauh, through her extensive academic, research and clinical experience, brings a perspective to CHPAC that is inherently *translational*. She has an understanding of applied public health work, all the way from the nitty gritty of data collection to public policy. Her focus has been on the children of underserved and vulnerable populations, especially *minority groups with biological and social susceptibility to hazardous exposures*. She views science through an *interdisciplinary* lens, as evidenced by her multi-site and cross-country collaborations, including the study of populations with *geographical diversity and health care inequities*.

Nomination #3: Dr. Kristi Pullen Fedinick

Statement of Interest

The protection of children's health is a key motivation in my personal and professional roles. As a mom, one of my primary goals is to ensure that my child and his peers have safe, nurturing environments that are supportive of their growth and development. As a scientist working for a public interest organization, I utilize systems-based thinking and approaches to ensure that regulatory apparatus functionally protect susceptible and/or vulnerable populations, including children. Serving as a member of the CHPAC would allow to me leverage my experiences as both a scientist and a parent to help advise EPA on the multidimensional issues it faces related to children's health protection.

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Kristi Pullen Fedinick, Ph.D., is the Director of Science and Data in the Healthy People & Thriving Communities (HPTC) Program at the Natural Resources Defense Council and a Professorial Lecturer in the Department of Environmental and Occupational Health of the Milken Institute School of Public Health at The George Washington University. Dr. Pullen Fedinick's research career includes experience in environmental health and policy, molecular, structural, and computational biology; biochemistry; and population health. Prior to joining NRDC, she worked as a scientist for a Chicago-based environmental non-profit, where she focused on air and drinking water quality, science communications, and environmental justice. Her current work focuses on the use of high-throughput technologies, predictive toxicology, and computational approaches to chemical risk assessments. Additional work includes the geospatial and statistical analysis of chemicals in the environment, with a particular emphasis on drinking water and on the disproportionate impact of chemical exposures in vulnerable populations. Additionally, Dr. Pullen Fedinick has served in federal advisory roles (e.g., *ad hoc* FIFRA SAP membership), participated on several National Academies of Sciences committees (e.g., NRC Committee on Incorporating 21st Century Science in Risk-Based Evaluations and the Standing Committee on Use of Emerging Science for Environmental Health Decisions), and held external advisory roles (including academic and Society of Toxicology committees). She holds a bachelor's degree in biochemistry and molecular biology from the University of Maryland Baltimore County and a Ph.D. in molecular and cell biology with a focus on structural biology and biochemistry from the University of California, Berkeley. She was a Robert Wood Johnson Foundation Health and Society Scholar at the Harvard T. H. Chan School of Public Health. If chosen, Dr. Pullen Fedinick's experience utilizing data visualization and computational methodologies to assess and communicate the relationships between environmental stressors (e.g., environmental pollution, climate change impacts, etc.) and individual and community health, as well as her ability to visualize, synthesize, and communicate such information across a wide array of topic areas to a broad range of stakeholders (from senior decision-makers and the lay public to policy reports, comments to federal agencies, and peer-reviewed publications), would make her a particular asset to this committee.

Nomination #4: Maureen Swanson, MPA

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Maureen Swanson, MPA is currently the Director of Environmental Risk Reduction & Project TENDR at The Arc of the U.S. which is the largest national community-based organization advocating for and with people with intellectual and developmental disabilities (I/DD). She has been the co-director of Project TENDR since 2014 where her aim is to prevent toxic chemical exposures, especially for pregnant women and children.

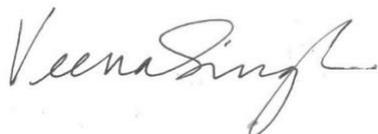
From 2006 to 2019, she was the Director of the Healthy Children Project with the Learning Disabilities Association of America. At LDAA, Maureen Elevated and integrated neurodevelopmental concerns into safer chemical policies and organized congressional briefings on chemical threats to children’s brain development. Maureen was also a founding member of the Safer Chemicals Healthy Families campaign where she worked from 2009 to 2017, during which she was invited as a witness at a Congressional Hearing on “Revisiting the Toxic Substances Control Act of 1976”. In 2017, she led a national workshop titled “Eliminating Lead Risks in Schools and Child Care Facilities,” convened with Children’s Environmental Health Network and Healthy Schools Network in Washington, D.C. Maureen’s work historically has centered children’s environmental health and more importantly, focusing on translating science into meaningful policy change. If chosen, she would represent a critical voice based on her expertise in children’s neurodevelopmental health and extensive background working in the disability community, an often-neglected subpopulation within the vulnerable population of children. Please refer to her nomination for further information.

Thank you for the opportunity to provide comments and nominations. Please let us know if we can provide any additional information or be of further help.

Respectfully,



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