

CHILDREN'S ENVIRONMENTAL HEALTH & PROTECTION ADVISORY COUNCIL

November 18, 2022

Honorable Joseph Bartenfelder Secretary, Maryland Department of Agriculture 50 Harry S. Truman Parkway Annapolis, MD 21401

RE: 2022 Joint Chairmen's Report - Integrated Pest Management in Schools Report

Dear Secretary Bartenfelder;

The Children's Environmental Health & Protection Advisory Council (CEHPAC) is pleased to provide input on the 2022 Joint Chairmen's Report (JCR) concerning Integrated Pest Management (IPM) policies in Maryland local education agencies (termed "school districts" in the JCR). CEHPAC was named in the JCR language requesting "...that the Maryland Department of Agriculture (MDA), in consultation with the Maryland State Department of Education (MSDE) and the Children's Environmental Health and Protection Advisory Council (CEHPAC), submit a report on whether school districts are complying with the integrated pest management law."²

CEHPAC is a State advisory council which includes representatives from academia, industry, state and local government, parents, educators, and other stakeholders. One of the statutory responsibilities of CEHPAC, stated in Maryland Code Annotated, Health General Article §13–1506, is to provide input on policies, practices, and other standards to ensure they are protective of children's environmental health. As such, CEHPAC respectfully submits the following comments, formally adopted by CEHPAC at a public meeting on November 16, 2022:

¹Report on the Fiscal 2023 State Operating Budget (SB 290) and the State Capital Budget (SB 291) and Related Recommendations by the Chairmen of the Senate Budget and Taxation Committee and House Appropriations Committee. Joint Chairmen's Report, Annapolis, Maryland, 2022 Session. Accessible at: https://mgaleg.maryland.gov/Pubs/BudgetFiscal/2022rs-budget-docs-jcr.pdf

² Ibid, p.87.

- First, CEHPAC notes that the information contained in the JCR on compliance, violations, and specific IPM Plans, is of interest to parents, educators, and other stakeholders but is not readily available to the public in all cases. CEHPAC recommends that information on each local education agency's IPM Plan, compliance, violations, and key contacts be made publicly available on MDA's website and kept up to date. CEHPAC further recommends that MDA require all local education agencies to maintain current versions of these plans on their websites.
- Second, CEHPAC has received information in discussions with local education agencies and their IPM coordinators regarding the need for training, and recommends that MDA work with local education agencies to provide training and updated training materials (including updated IPM manuals) regarding IPM implementation and children's environmental health. CEHPAC is prepared to assist MDA in these efforts including updating of relevant materials, and also recognizes that additional resources will likely be required for MDA to meet this recommendation.

CEHPAC appreciates the opportunity to provide input on this important topic. CEHPAC looks forward to continued engagement with the Maryland Department of Agriculture on issues concerning children's environmental health.

Sincerely,

Clifford S. Mitchell, MS, MD, MPH

Chair, Children's Environmental Health & Protection Advisory Council (CEHPAC)

cc: Devon Dodson, Vice-Chair, CEHPAC
Cassie Shirk, Assistant Secretary and Acting Director of Governmental Affairs, MDA
Megan Peters, Acting Director of Governmental Affairs, MDH
Mohammed Choudhury, Superintendent, Maryland State Department of Education

This letter is a product of the Maryland State Children's Environmental Health and Protection Advisory Council, and does not necessarily represent the views or positions of the Maryland Department of Health or any other State agency.