



Green & Healthy Homes Initiative®

2714 Hudson Street
Baltimore, MD 21224-4716

P: 410-534-6447

F: 410-534-6475

www.ghhi.org

February 28, 2022

Delegate Kumar P. Barve, Chairman
House Environment and Transportation Committee
Lowe House Office Building, Room 251
6 Bladen Street
Annapolis, Maryland 21401

Re: **FAVORABLE WITH AMENDMENTS - HB1110 – Environment – Lead Poisoning Prevention – Elevated Blood Lead Level**

Dear Chairman Barve and Members of the Committee:

On behalf of the Green & Healthy Homes Initiative (GHHI), I offer this testimony in support of HB1110 with amendments. I represent GHHI as a member of the EPA Children's Health Protection Advisory Committee and as the Chair of the Maryland Lead Poisoning Prevention Commission. GHHI is also a member of the Maryland Public Health Association Advisory Committee. GHHI is dedicated to addressing the social determinants of health and the advancement of racial and health equity through the creation of healthy, safe and energy efficient homes. GHHI has been at the frontline of holistic healthy housing for over three decades.

Over its 30-year history, GHHI has developed the holistic health, housing and energy efficiency service delivery model adopted by the U.S. Department of Housing and Urban Development and implemented in our nationally recognized, Maryland-based direct services program. GHHI helped to elevate Maryland as a national leader in healthy housing and in the reduction of childhood lead poisoning by 99% statewide through more than 45 pieces of state and local healthy housing supported legislation. Through our own research and evidence-based practices, GHHI has found that a healthy and energy efficient home yields a multitude of health, energy and non-energy benefits for residents, particularly low-income residents who can benefit the most from housing improvements in terms of financial and housing stability and wealth attainment over the long-term. We are deeply committed to advancing racial and health equity, economic mobility and climate resiliency through lead safer and more energy efficient standards for low-income housing.

Maryland needs to lower the blood lead reference level to the CDC reference level of 3.5 µg/dl in order to implement more aggressive prevention measures before a child suffers from a higher EBL and has to endure greater effects of lead poisoning. Maryland must pursue more proactive and preventive policies rather than reactive policies after a child has been lead poisoned at a level of 5 µg/dl or higher.

In 2019, there were 1,526 children with elevated blood levels (EBLs) of 5 µg/dl or higher in Maryland. The effects of lead poisoning are well documented. Lead poisoning contributes to learning disabilities, loss of IQ, speech development problems, attention deficit disorder, poor school performance and violent, aggressive behavior. Children poisoned by lead are 7 times more likely to drop out of school and 6 times more likely to be involved in the juvenile justice system.

Proposed Amendment

GHHI proposes an Amendment to HB1110 to the Committee to revise the implementation date to April 1, 2023, for the lowering of the statutory blood lead reference level in Maryland to 3.5 µg/dl for: medical case management, environmental investigation, issuance of Notices of Elevated Blood Lead Levels and the triggering of responses to Notices of EBL for rental property owners of affected properties under §6-819 of the Environment Article.

Why GHHI Opposes a Longer Delay in Lowering the Blood Lead Reference Level in Maryland until 2024

In 2012, CDC determined that there was no safe level of lead in a child's body and lowered the blood lead reference level from 10 µg/dl to 5 µg/dl for children. Maryland lowered its blood lead reference level to 5 µg/dl to conform with the CDC. HB1233, the Maryland Healthy Children Act, was passed in 2019 and established that Maryland would align its blood lead standards with any revisions to the CDC's blood reference level within one year. The current Maryland law allows 12 months for Maryland state and local agencies to plan for and adjust resources and policies for the lower blood lead reference level. On October 28, 2021, the CDC reviewed all the available blood lead data in the United States and the scientific research and lowered the blood lead reference level accordingly to 3.5 µg/dl.

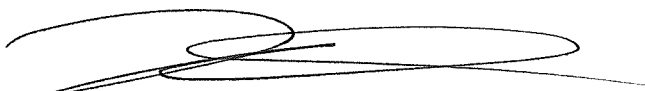
Maryland should not delay the lowering of the blood lead reference level beyond April 1, 2023 for: medical case management, environmental investigation, Notice of Elevated Blood Lead Level issuance and Notice of EBL response periods for rental property owners for the following reasons:

- Maryland has been aware of the CDC blood lead reference level change since 10/28/21 and has time to prepare for implementation of the new blood lead reference level;
- Not permitting a longer delay will advance the focus on preventing children from being poisoned and align Maryland with CDC's guidance. Failure to adopt the federal standard puts our state efforts behind the best science and does a disservice to what we already know of how to reduce lead poisoning – prevention;
- Children in owner occupied homes need greater protections than they receive today and lowering the blood lead reference level will provide: prevention education, identification of lead hazards, and case management to link parents to prevention resources at lower lead levels;

- Earlier notification and protection to rental property owners at lead levels of 3.5 µg/dl allows them to respond and reduce their liability. This can prevent higher level lead poisonings and the possible poisonings of siblings in the home;
- Other jurisdictions are following the CDC and have concluded that children should receive medical case management and action at lower blood lead levels. The State of Pennsylvania recently lowered its blood lead reference level to 3.5 µg/dl effective 1/1/22.

All children poisoned with elevated blood lead levels deserve preventive services responses sooner. Delaying the implementation of the lower blood lead reference level until 2024 will allow additional children to be poisoned and prevent proper disclosure to their families who can take action to protect their child's health sooner. The science is clear that there is no safe level of lead in a child's body and the impact is permanent and long term. Maryland should be in line with the CDC's standards and current research by lowering Maryland's blood lead reference level in a timely manner. We must act to give Maryland children the best trajectory to achieve their full potential. We ask the Committee for a Favorable Report on HB1110 with the adoption of the Amendment proposed by GHHI.

Respectfully Yours,



Ruth Ann Norton
President and CEO