

**BILL:** House Bill 665  
**TITLE:** Public Schools - Air Quality Testing - Posting Online  
**DATE:** February 24, 2022  
**POSITION:** OPPOSE  
**COMMITTEE:** Ways and Means  
**CONTACT:** John R. Woolums, Esq.

The Maryland Association of Boards of Education (MABE) opposes House Bill 665, which appears intended to require the use of outside private contractors to conduct indoor air quality assessments of schools.

MABE agrees that ensuring indoor air quality in the public school setting is an important component of a school system's strategy to maintain healthy school environments. MABE has promoted the use of the U.S. EPA's Indoor Air Quality (IAQ) Tools for Schools guidelines and kit. MABE recognizes the value of these tools in helping to ensure good indoor air quality, and reduce the risks of student and employee health problems. In light of the existing breadth and depth of school facilities maintenance staff activities relating to using best practices, MABE does not believe the proposal to require the use of private contractors would be a cost-effective use of limited resources.

The COVID-19 pandemic resulted in revisions to public health and safety standards for all commercial buildings, including revised guidance from the Centers for Disease Control (CDC) for school facilities. These standards have resulted in a wide array of previously unbudgeted investments in building systems, equipment, supplies, and school maintenance and custodial personnel. Fortunately, significant federal funding was provided to local school systems to support COVID-19 responses to ensure the safe operation of school facilities, including: purchasing personal protective equipment (PPE) and supplies to sanitize school facilities; and inspection, testing, maintenance, repair, and installation of new systems to improve the indoor air quality in school facilities, including heating, ventilation, and air conditioning systems, filtering, purification and other air cleaning, fans, control systems, and window and door repair and replacement. However, in order to sustain the benefits of these one-time COVID-related expenditures local school systems are in need of increased investments by the State and local governments for school facilities maintenance personnel and maintenance budgets.

Local school systems are currently devoting staff time and resources to efforts to provide healthy school environments, including addressing indoor air quality issues. Risk managers and facility maintenance staff recognize the need for a comprehensive preventative management strategy, including educating and training staff, and providing them with the maintenance budgets to support these strategies. For example, routine cleaning and/or replacement of filters for HVAC systems is a simple yet essential component of a successful IAQ program. In addition, routine monitoring coupled with prompt responses to problems when they do occur can avoid the emergence of more serious and costly problems. These are examples of best practices that must be vigorously and continually implemented to ensure that indoor air quality does not become a negative factor for our students and teachers.

Federal guidance recognizes that the use of private consultants and testing services may be appropriate in limited, specialized cases. However, these situations are identified as involving lead, asbestos, radon and other public health hazards, rather than the routine, school community-based approach featuring school system staff monitoring and responding to identified issues through maintenance.

Again, MABE agrees that indoor air quality in public schools is a very important health issue. However, MABE would prefer to focus on securing sufficient state and local funding for school construction and maintenance programs, and promoting the accepted best practices described above, rather than on outsourcing IAQ testing. For these reasons, MABE requests an unfavorable report on House Bill 665.