



The Role of Local Health Departments in Promoting Children's Environmental Health at Early Care and Education Centers

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Background

The Importance of Safe Siting for Early Care and Education

According to the Environmental Protection Agency, “Environmental contaminants can affect children quite differently than adults, both because children may be more highly exposed to contaminants, and because they are often more vulnerable to the toxic effects of contaminants.”¹

Considering potential environmental hazards in relation to the siting of early care and education (ECE) facilities can reduce the risk of children’s exposure to dangerous chemicals.

Every state has licensing requirements for early care and education (ECE) facilities, but not all of these regulations address site- and location-specific environmental hazards.²



Project Background

The Children’s Environmental Health Network (CEHN), the National Association of County and City Health Officials (NACCHO), and the Environmental Law Institute (ELI) are collaborating with the Agency for Toxic Substances and Disease Registry (ATSDR) to encourage state-based approaches to protect young children from environmental hazards.

This collaboration supports individual states to implement initiatives that integrate safe siting considerations into early child care education (ECE) policies and programmatic best practices. The ultimate goal of the collaboration is to ensure that ECE centers are safely located and that environmental hazards are addressed so that children are protected.



As part of this project, NACCHO conducted an exploratory assessment to determine how local health departments (LHDs) work with ECE centers to prevent children’s exposure to environmental hazards.

Objectives & Method

Objectives:

- Inform ATSDR and NACCHO of challenges, strategies, and resources related to LHD involvement in the licensing and regulation of ECE centers.
- Identify best practices and technical assistance needs of state programs so that future NACCHO and ATSDR policies, guidance documents, tools, and other resources reflect what health departments experience at the state level.

Method:

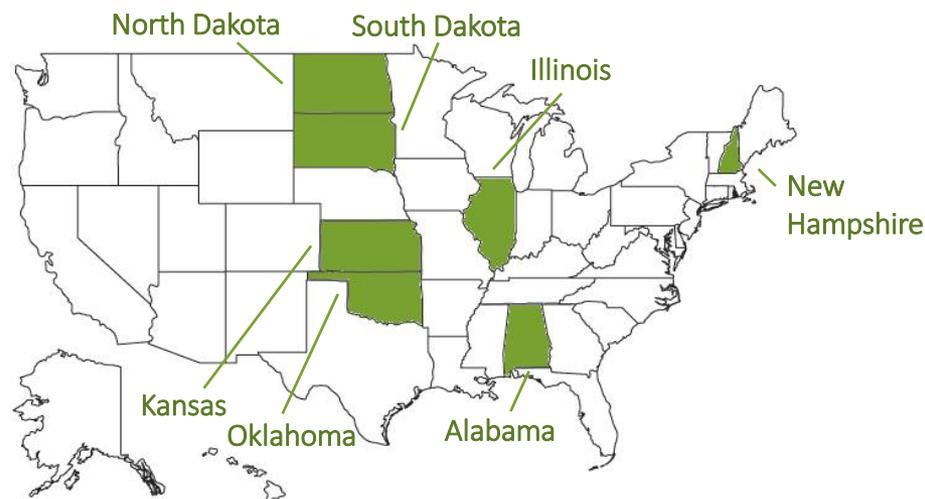
Outreach | NACCHO conducted outreach to large and medium LHDs from states that do not receive funding from ATSDR's Partnership to Promote Local Efforts to Reduce Environmental Exposure (APPLETREE). Currently 25 states have APPLETREE funding.

Written Questionnaires | Nine LHDs from seven states filled out a seven-question questionnaire.

Respondents had the following job titles:

- Public Health Specialist or Manager (4)
- Environmental Health Specialist or Supervisor (3)
- Division Director of Child Care Licensing (1)
- Food and Lodging Supervisor (1)

Phone Interviews | Seven respondents participated in follow-up phone calls to answer clarifying questions.





Local Health Department Overviews

Summaries of the roles of the local health departments interviewed in ECE center licensing and inspection.

ECE Center Licensing and Inspection Overview: Jefferson County, AL

- Both facility-based and home-based ECE centers with 12+ children operating 4+ hours/day or 20+ hours/week require an Authorization to Operate from the LHD.
 - The LHD performs an inspection to ensure the ECE center adheres to minimum environmental standards and “eliminates conditions prejudicial to health.”
- The state has a separate licensing process, with some ECE centers exempt. The LHD regulates both state licensed and state exempt ECE centers.

Process for ECE Center Siting

The ECE center must provide a zoning certificate and fire inspection report. The LHD does not know if environmental contamination is considered as part of this process.

ECE Center Licensing and Inspection Overview: Montgomery County, AL

- The LHD manages food permitting on behalf of the state at facility-based ECE centers that choose to serve food.
 - They use the same standards used for restaurants, the 2013 FDA Food Code.
 - Inspectors are trained only on food, not to look for environmental hazards.
- The LHD conducts courtesy food safety inspections and basic safety inspections for home-based ECE centers on behalf of the state when centers are going through the state licensing process.

Process for ECE Center Siting

The LHD is unaware of a process.

ECE Center Licensing and Inspection Overview: Chicago, IL

- The state licenses all ECE centers (3+ children apart from their parent/guardian), but a city license is required first for facility-based ECE centers. The city is not involved in the state licensing process.
- The city licensing process includes an onsite inspection by the LHD, which focuses mostly on food sanitation and injury, as well as by the Department of Buildings and the Fire Prevention Bureau.

Process for ECE Center Siting

- The city licensing process requires business activity to be approved by the City Department of Zoning (no environmental siting considerations).
- The City Department of Planning and Development has oversight over new building permits, and they might consider environmental concerns with ECE center siting.

ECE Center Licensing and Inspection Overview: Johnson County, KS

- Through a contract with the state health department, the LHD is funded to do all regulatory onsite work for home-based and facility-based ECE center licensing.
- All regulations come from the state, and the LHD implements the regulations.

Process for ECE Center Siting

- New facilities have the option for an onsite consultation by childcare surveyors before signing a lease or buying a property.
- Applications for new facilities must be approved by the fire department and city codes, with final approval by the state.
- Example: A provider wanted to buy an old gas station and convert it into a childcare center. The LHD collaborated with the fire department and city codes department to investigate, and ultimately they decided it was too much of an environmental hazard.

ECE Center Licensing and Inspection Overview: Lawrence-Douglas County, KS

- The state grants licenses for both home-based and facility-based ECE centers, but the LHD works on behalf of the state (with funding provided by the state) to do all inspections, monitoring, and reporting.

Process for ECE Center Siting

A new process dictates referencing a state spill notification website. The LHD wants to broaden their surveillance to include the area surrounding ECE centers, not just the property of the ECE center itself.

ECE Center Licensing and Inspection Overview: Manchester, NH

- The state oversees the licensing for all home-based and facility-based ECE centers, and the LHD provides inspections of these centers upon request, as dictated by state regulations. The state does not provide funding for these inspections.
- The LHD issues food service permits to both home-based and facility-based ECE centers with 12+ kids if the center chooses to provide food.

Process for ECE Center Siting

- ECE centers are required to get permits from the fire department and building department. These local authorities may submit any findings of previous site contamination to the state.
- There is an online database comprised of environmental information and data compiled by state programs, but no formal process in place to check the database during review of ECE centers.

ECE Center Licensing and Inspection Overview: Grand Forks, ND

- The LHD leads yearly environmental assessments and twice-yearly food service inspections of ECE centers, as dictated by state regulations.
- The LHD reports go to the local social services agency, which in turn reports to the state.

Process for ECE Center Siting

New ECE center sites are reviewed by the local planning office and the building department. Any concerns are flagged for the architect, who then carries out an environmental assessment.

ECE Center Licensing and Inspection Overview: Oklahoma City County, OK

- The LHD has a contract with the state to ensure facility-based ECE centers are in compliance with state requirements.
- Since the LHD is at the county level, it also ensures ECE centers comply with local city ordinances.
- The LHD conducts ECE center inspections focused mostly on food safety, while the state handles other environmental concerns.

Process for ECE Center Siting

ECE centers need to check with city zoning to make sure the space is suited for an ECE center, but zoning doesn't consider environmental contaminants.

ECE Center Licensing and Inspection Overview: Sioux Falls, SD

- The city requires LHD regulation for home-based ECE centers with 12 or fewer children.
- The state offers voluntary regulation for home-based ECE centers, and the state has additional requirements, such as immunizations and guidelines on home structure.

Process for ECE Center Siting

The LHD is unaware of a process.



Findings

Compilation of findings among all the health departments interviewed on each topic.

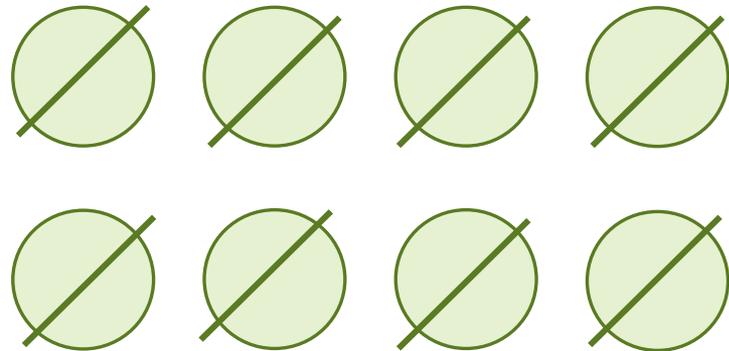
Environmental Health Concerns

Respondents were asked about the most important environmental health concerns at ECE centers in their jurisdictions:

One respondent reported on Environmental Protection Agency Superfund and Brownfield sites in their district, but not specifically affecting ECE centers.



The other eight respondents reported no large-scale environmental hazards.



Environmental Health Concerns

Respondents were asked about the most important environmental health concerns at ECE centers in their jurisdictions:

Four respondents reported lead paint as a potential environmental health concern.



Additional concerns reported include air quality, water quality (especially with well water), and pest control.



Licensing and Inspection

Respondents were asked what functions and responsibilities their health departments had in regard to early care and education:

Three respondents reported that ECE center licensing happens at the local level.



Two of these LHDs manage the overall licensing process, one for home-based centers only.



The other LHD helps with inspection, with another local agency managing licensing.



Licensing and Inspection

Respondents were asked what functions and responsibilities their health departments had in regard to early care and education:

Five respondents reported conducting inspections on behalf of the state as part of the state licensing process.



Four of these LHDs cover a range of environmental hazards in their inspections; one covers only food service.



Two LHDs manage food service permitting at ECE centers.



Safe Siting Review Process

Respondents were asked if their health departments had processes in place to identify any potential environmental contamination at the site of a proposed ECE center:

Two respondents reported having no role in or knowledge of this process.



Two of the LHDs use an online database to access information about hazardous properties and spills.



Only one of the respondents has a formal process in place to check the database when a new ECE center is opening.

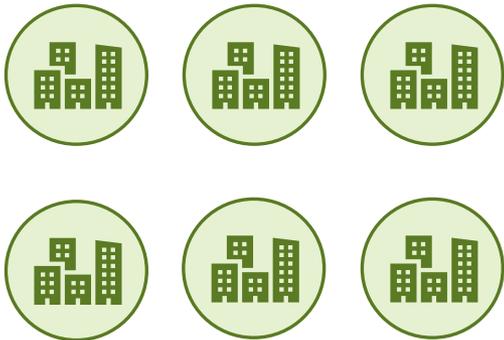


Safe Siting Review Process

Respondents were asked if their health departments had processes in place to identify any potential environmental contamination at the site of a proposed ECE center:

Six respondents reported other local offices have a role in reviewing the site of a proposed ECE center.

Examples include the local planning office, building department, city codes, city zoning, and fire department.



Three of these respondents said the local offices flag potential environmental contamination.

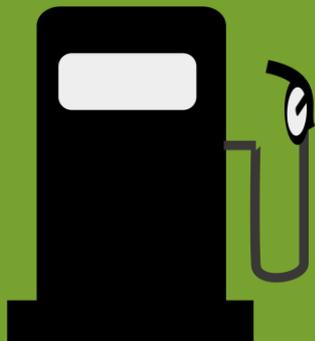


Two thought it was possible the local offices would take environmental contamination into consideration.



One said it was unlikely.





Safe Siting Review Example

One respondent gave an example of a time when a potential environmental hazard was discovered during the siting review process of a proposed ECE center:

The ECE provider wanted to buy an old gas station and convert it into a childcare center.

In this jurisdiction, all applications for new facilities must be approved by the fire department and city codes, and the LHD has a contract with the state health department to do all regulatory onsite work for ECE center licensing.

The LHD collaborated with the fire department and city codes department to investigate the situation, and ultimately they decided it was too much of an environmental hazard.

Partnerships

LHDs were asked how they collaborate with ECE centers, local or state licensing, or other local organizations responsible for health and safety of early care and education centers:

All of the respondents reported collaborating with state agencies.

Examples include departments of health, human services, environment, etc.



Eight of the nine respondents reported collaborating with other local agencies.

Examples include public agencies (social services, fire department, emergency services, district attorney, etc.), nonprofit organizations, and educational institutions.



LHDs often refer ECE providers to these local partners for training and continuing education.



Partnerships

LHDs were asked how they collaborate with ECE centers, local or state licensing, or other local organizations responsible for health and safety of early care and education centers:

Five LHDs reported providing training and technical assistance directly to ECE centers.

Topics include handwashing, food service, playground safety, lead awareness, proper chemical usage, diapering area disinfection, employee and child illness policies, etc.



One LHD reported providing this training during regular inspections.



The other four serve as a resource to ECE centers outside of regular inspections, offering additional training opportunities and/or dedicated technical assistance.



Public Health Concerns in ECE Centers

Respondents assess or monitor the following public health issues in ECE centers:



Structure:

- Good repair on floors/walls/ceiling
- Deteriorating lead-based paint
- Deteriorating asbestos building material
- Plumbing
- Septic systems functioning

Chemicals:

- Proper use of chemicals for cleaning and disinfecting
- Cleaning/painting odors
- No access to dangerous chemicals/machines.
- Products with warning labels are out of reach of children



Food Safety:

- Handwashing in the kitchen
- Refrigeration
- Food labeling
- Cross contamination
- Food service operations

Sanitation:

- Well-maintained and clean furniture, linens and toys
- Clean carpets
- Covered trash cans



Outdoor Safety:

- Fences in good repair (kids can't get out of or easily over them)
- Playground equipment in good working condition (no rust or exposed screws/bolts)
- Playground area with absorptive material for climbing

Training of ECE Center Inspectors

LHDs were asked what kind of training their health department provides to ECE center inspectors on identifying environmental health issues:

Three LHDs reported that their training for ECE center inspectors focuses mostly on food safety.



Two LHDs encourage inspectors to attend the National Environmental Health Association conference for environmental health training.



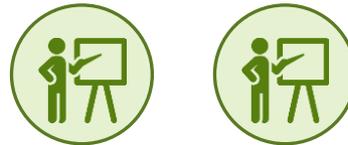
Four LHDs reported that shadowing and on-the-job learning were primary sources of training.



Training of ECE Center Inspectors

LHDs were asked what kind of training their health department provides to ECE center inspectors on identifying environmental health issues:

Two LHDs host quarterly ongoing trainings for inspectors, though most are not directly related to environmental health and ECE center inspection specifically.



One LHD has its own public health training institute, and inspectors are required to complete certifications through this program, which includes environmental health education.



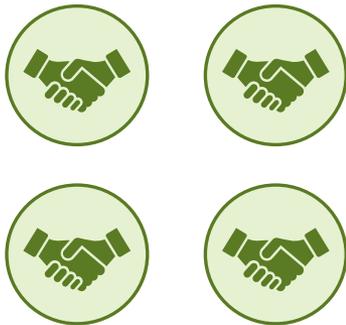
One LHD requires all new inspectors to attend an environmental health course through the state health department.



What Do LHDs Need to Ensure ECE Centers Are Free from Environmental Hazards?

The LHDs were asked what information or connections would be helpful to ensure ECE centers in their jurisdictions are free from environmental hazards:

Four respondents said their collaboration with other local and state agencies enables them to properly assess environmental hazards at ECE centers.



Two respondents brought up funding.



One respondent has a state contract for inspections, but the grant does not cover costs.



Another respondent said they could monitor more environmental hazards with the budget for a lab.



What Do LHDs Need to Ensure ECE Centers Are Free from Environmental Hazards?

The LHDs were asked what information or connections would be helpful to ensure ECE centers in their jurisdictions are free from environmental hazards:

One LHD reported that public health is currently an after-thought in city planning and needs to be more involved.



Another LHD would like additional resources on identification and surveillance of environmental hazards.



Only one respondent is aware of the ECE center safe siting resources developed by ATSDR.





Conclusions, Limitations and Resources

Key Findings

The majority of LHDs (five out of nine) conduct inspections on behalf of the state as part of the state licensing process.



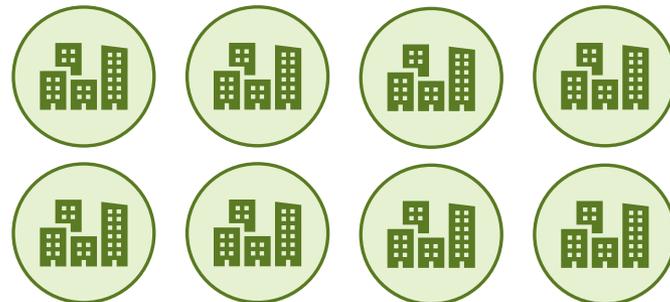
None of the LHDs reported training their inspectors specifically in environmental health issues at ECE centers.



Only one LHD has a formal process in place within the department to access information about hazardous properties and spills when a new ECE center is opening.

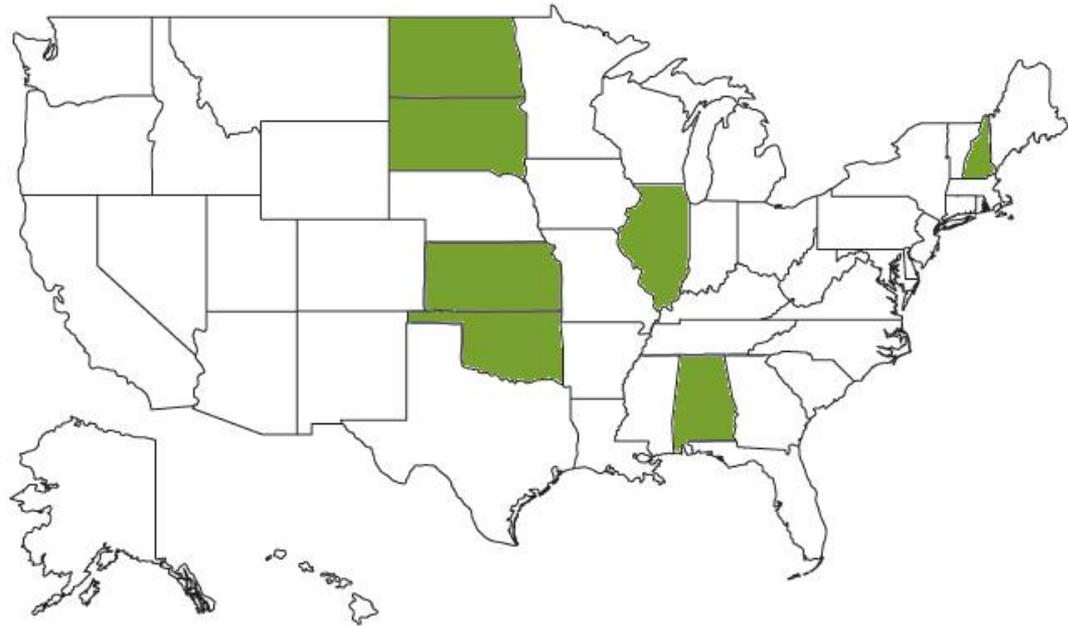


Most of the LHDs (eight out of nine) rely on collaborations with other local agencies as part of the inspection and licensing process.



Limitations

The nine local health departments involved in the assessment are not a representative cross-section of local health departments across the country.



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We have a lot more we can do because we have more staff and we have a lot of community partners that work with us. [A more rural county] won't have that availability to them.

- Respondent

Resources

Choose Safe Places for Early Care and Education

Agency for Toxic Substances and Disease Registry (ATSDR)

<https://www.atsdr.cdc.gov/safeplacesforece/index.html>

Addressing Environmental Site Hazards at Child Care Facilities: A Review of State Policy Strategies

Environmental Law Institute

<https://www.eli.org/research-report/addressing-environmental-site-hazards-child-care-facilities-review-state-policy-strategies>

Eco-Healthy Child Care® Program

Children's Environmental Health Network

<https://cehn.org/our-work/eco-healthy-child-care/>

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The process of siting should be more formalized in every community. As we become more aware of all the environmental hazards, we may not have the rules and regulations to address every one because they're always emerging. [The resources] give a framework to address these things in the forefront verses having to react after the fact, and I think that's a really valuable tool.

- Respondent, referencing the ATSDR safe siting resources



Acknowledgements

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The mission of the National Association of County and City Health Officials (NACCHO) is to improve the health of communities by strengthening and advocating for local health departments.

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