

## **EXECUTIVE SUMMARY for ConnFESS Addendum to 2005 Report**

During the first week of March 2006, the State Department of Education (SDE) released its second report on the conditions of Connecticut's public school facilities to include a chapter on indoor air quality (IAQ). These reports are based on data derived from the School Facilities Survey (ED050) and are produced for the Education Committee of the Connecticut General Assembly. The 2003 report had not fully complied with the IAQ for schools law (PA 03-220) because it did not ask school officials to comment on actions taken to implement an IAQ program. To its credit, SDE revised the ED050 in 2005 to include a rating system in which ventilation, source reduction and moisture intrusion issues were ranked as "(1) Not a problem, (2) A problem and not yet addressed, (3) A problem scheduled for repair or (4) No longer a problem because they have been corrected."

Unfortunately, numerous local school officials did not fill out questions in the IAQ section of the ED050 correctly. This became obvious when the overall IAQ rating of a given school contradicted how IAQ issues (actions taken) were ranked. One of two patterns emerged. Some schools had an IAQ rating indicating serious environmental health hazards that could prompt the closing of the school and then identified no or only minor IAQ issues. At the opposite end of the spectrum were schools that ranked their IAQ as outstanding, and then listed up to thirteen major problems in need of remediation. These patterns are so pervasive in the SDE report that its conclusions cannot be viewed as credible. SDE staff apparently did not proofread or analyze the ED050s adequately prior to tabulating and summarizing their results.

Another obstruction to implementing the IAQ for schools law was created by the misleading wording of question #34 in the 2005 ED050. Question #34 asked "Has the district provided a uniform inspection and evaluation of the indoor air quality in this building, such as the Environmental Protection Agency's Tools for Schools, Y/N? (Not required until January 1, 2008)". Many school officials inferred (as ConnFESS had predicted) that they did not have to have an IAQ program until 2008. This confusion was further reinforced when the introduction in the SDE report erroneously stated "... at this time no school district is required to conduct inspections and evaluations." Soon school districts started cancelling previously scheduled Tools for Schools trainings. In March 2006 a letter cosigned by the Commissioners of Education and Public Health had to be sent out to all school districts to clarify that all districts have been required to "... adopt and implement an indoor air quality program that provides for ongoing maintenance and facilities reviews necessary for the maintenance and improvement of the indoor air quality of its facilities" since PA 03-220 was enacted in July of 2003.

Another threat to the effective implementation of PA 03-220 is presented by the passage of PA 06-158 in 2006, a law dealing with school construction issues. Among its many provisions, this new law reduces by half the number of SDE reports on school

facility conditions specified by PA 03-220. SDE will be responsible for producing these reports biennially rather than annually. It is ConnFESS's position that the other sections of this report probably do not need to be documented each year. IAQ issues are very different because they can dramatically impact the long term health of school occupants and the quality of education students receive. Biennial reporting does not keep pace with the public's need and right to know whether IAQ problems have been identified and corrected. It encourages complacency instead of an ongoing vigilance to maintain healthy school environments. As a result, a crisis management rather than a proactive approach is promoted.

ConnFESS is calling for a new working group to strengthen - not weaken - legislative intent and language. We have drafted a revised ED050 and recommended steps needed to produce accurate, annual reports on school IAQ. ConnFESS continues to assert someone at the local and state level must be officially responsible for ensuring the effective implementation of school environmental laws. For every year the legislative intent of these laws is undermined, the State of Connecticut fails to do its utmost to protect school children and employees from preventable health hazards.