



The Massachusetts Chapter

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Comments of the Massachusetts Chapter American Academy of Pediatrics Before the Department of Public Health Re: 105 CMR 460.000: Lead Poisoning Prevention and Control

September 28, 2016

These comments are submitted on behalf of the 1,800 members of the Massachusetts Chapter of the American Academy of Pediatrics (MCAAP) in strong support of the proposed regulations, which would lower the lead level defined as lead poisoning. The members of the MCAAP are physicians dedicated to improving the quality of life for children by providing quality health care and advocating for them and their families. The MCAAP is committed to the attainment of optimal physical, mental and social health for all infants, children, adolescents, and young adults. The MCAAP has been a strong and consistent advocate for public health initiatives and supports efforts to prevent lead poisoning of children.

Although banned since 1978, lead paint remains in many Massachusetts homes. The prevalence of lead paint in homes contributes significantly to childhood lead poisoning as well as illegal housing discrimination against families with children. The Centers for Disease Control (CDC) declared that there is no safe level of lead in any child's body and have recommended 5 micrograms per deciliter, as its "blood lead level of concern". The best research has demonstrated potentially significant adverse effects at this level, and the trigger for healthcare and environmental service interventions should reflect this scientific data. Currently, in Massachusetts for children under the age of six, the level at which that child is considered to be lead poisoned (and which triggers public health intervention) is 25 micrograms per deciliter or greater - in other words 5 times higher than what the CDC recommends.

The proposed regulation would lower the lead poisoning level in Massachusetts to 10 micrograms per deciliter from the current 25 micrograms per deciliter standard. This would still be twice the CDC recommended level but is far less than the antiquated current Massachusetts threshold.

Research has shown a direct link between lead exposure and potentially very serious adverse health effects. All children under the age of 6 years are especially vulnerable to lead poisoning because their brains are rapidly developing. All lead levels are known to cause negative outcomes including lowered IQ, behavioral problems, brain damage, sleep disorders, and antisocial behavior/violence. Children should be safest within their own homes. However, this is where the majority of children are exposed to lead paint. Almost all houses built before 1978 in this part of the country contain lead paint which chips and creates dust as it ages. This increases a child's likelihood of lead ingestion and poisoning.

Massachusetts has been a leader in lead policy before, creating strong, comprehensive policies requiring remediation 7 years before the rest of the nation, but we have not kept up with the science as has the CDC and other states. The efforts of clinicians, parents, and teachers to safeguard children and act to treat cases of lead poisoning have been severely hampered for decades by scientifically outdated policies. These changes will make a big difference. Now is the time to update our lead regulations and protect children.

The MCAAP urges the adoption of the regulations as proposed.

Respectfully,

A handwritten signature in black ink that reads "DeWayne Pursley". The signature is written in a cursive style with a large, stylized initial "D".

DeWayne Pursley, M.D., MPH, FAAP
President