



## National Environmental Health Association

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June 4, 2020

Mr. Harold Lucie  
Joint DPA Office  
Federal Emergency Management Agency  
500 C Street SW  
Washington, DC 20472-3184

Email: [FEMA-DPA@fema.dhs.gov](mailto:FEMA-DPA@fema.dhs.gov)

### **Re: Docket ID FEMA-2020-0016 -- Comments of National Environmental Health Association**

Dear Mr. Lucie,

National Environmental Health Association (NEHA) is pleased to submit the following comments in response to the Federal Register Notice under the above-referenced docket number, seeking public comment on the Federal Emergency Management Agency's (FEMA) proposal to develop a voluntary agreement under Section 708 of the Defense Production Act, 50 U.S.C. § 4558 (DPA).

This comment is submitted on behalf of our 7,000 members, who are employed in the public sector (federal, state, local, and territorial), private sector, and uniformed services, and as clearly stated within our Mission Statement: NEHA strives to advance the environmental health professional (EHPs) for the purpose of providing a healthful environment for all. As such, we appreciate the opportunity to provide comment to this docket pertaining to FEMA's intent to develop a voluntary agreement under Section 708 of the Defense Production Act to help provide for the national defense by maximizing the effectiveness of the distribution of critical medical resources nationwide to respond to pandemics in general, and COVID-19 specifically.

Having reviewed the proposed voluntary agreement and the comments that have been submitted to this docket to date, NEHA strongly echoes the comments submitted by 3M corporation (*dated 5/20/20*). Effective information sharing and the potential development of private/public partnerships to inform the development of the prioritization subcommittees is essential to the health, safety and economic security of our nation. NEHA membership is well positioned and qualified to support and inform such an effort. Our credentialed professional workforce protects and safeguard the nation's food and water supply, in every jurisdiction in the country. They represent critical infrastructure when decisions are made about when and how to reopen society's most important daily activities – meat packing, food production, schools, universities, restaurants, the hospitality industry, recreational facilities, beaches, pools, spas, daycare, healthcare, long term care, and mass transportation. The knowledge, skill and experience of these public servants represents an essential technical voice in evidence-based discussions

on at-risk communities, the ways and means of local public health systems and the use and limitations of personal protective equipment (PPE).

The environmental health workforce is more than an informed voice, it is a principal stakeholder in decisions centered on PPE. Our professionals are secondary responders, that is, after immediate life safety issues have been addressed, environmental health professionals are frequently called on to assess conditions, estimate risk, and recommend preventive measures in support of return to normalcy. The mere act of going to work, places them at risk of exposure. NEHA strongly encourages FEMA consider the need for identifying non-traditional PPE “consumers” in the conversation and strategic planning as it comes to the prioritization of and potentially the allocation of these precious, limited supply of potentially life-saving PPE.

The environmental health workforce is the second largest professional constituency in the United States public health system, second only to nursing. Most of our professionals possess extensive backgrounds in math and science, work intimately with the regulated community, and frequently communicate in multiple languages out of necessity. If there is an opportunity for NEHA to engage in this conversation, we would look forward to the opportunity to support FEMA’s mission and to further provide our risk-informed insights, and – by all means possible – commit to enhancing private/public partnerships with other trade associations that NEHA enjoys relationships with, in order to further promote, protect and preserve the public’s health and well-being.

Sincerely yours,



David T. Dyjack, Dr.PH, CIH  
Executive Director and Chief Executive Officer