



May 1, 2023

The Honorable Joaquin Arambula, M.D.
Chair, Assembly Budget Subcommittee No. 1 on Health & Human Services
1021 O Street, Suite 8130
Sacramento, CA 95814

RE: Health Equity: CDPH Issue 3: Protecting Children from the Damaging Effects of Lead Exposure, Spring Finance Letter Issue 315 – SUPPORT IN CONCEPT Set for Hearing May 1, 2023 – Asm. Budget Subcommittee No. 1

Dear Assembly Member Arambula,

The County Health Executives Association of California (CHEAC), representing local health departments throughout the state, writes to express our SUPPORT IN CONCEPT position on the Administration's budget change proposal related to the Childhood Lead Poisoning Prevention Program (CLPPP). While CHEAC appreciates the proposed increase in funding for the CLPPP, local health departments are concerned that the requested funding is not sufficient to support full implementation and administration of the program.

Many local health departments administer the CLPPP program on behalf of the state. There are currently 48 jurisdictions contracted with the California Department of Public Health (CDPH) for this work. When a child is found to have an elevated blood lead level, local health departments provide case management services for those children and remediate environmental sources of lead exposure for those children.

In response to recent California State Auditor reports on childhood lead poisoning in California, CDPH made significant adjustments to its CLPPP Scope of Work (SOW) for the 2023-2026 contract period. These SOW adjustments include numerous primary prevention activities not previously included in contracts with local health departments, in addition to new administrative activities and tasks. These additional responsibilities for contracted local health departments will require additional staffing capacity and resources.

While the Administration's budget change proposal is a step in the right direction, CHEAC highlights several considerations below:

Blood Lead Reference Value Changes. With the modification of the Centers for Disease Prevention and Control (CDC) blood lead reference value to 3.5 mcg/dl, local health departments anticipate significant increases in cases of lead-poisoned children, compared to the prior reference value of 5.0 mcg/dl. In addition to more cases, local health departments anticipate case management for these children to be longer in duration as public health case managers will

remain in contact with children and families until the child reaches a blood lead level of 3.5 mcg/dl.

Primary Prevention Activities. The CLPPP 2023-2026 SOW includes many new activities for primary prevention efforts while the blood lead reference value is being decreased. The Administration's request only highlights six new activities related to primary prevention; however, each of those activities has a number of tasks associated with them that are new to local health departments.

Insufficient Funding for the Existing Program Requirements. Local health departments have indicated current CLPPP allocations have consistently been lower than actual program costs. Even with the proposed increased allocations to contracted jurisdictions, local health departments indicate additional resources are needed to be able to meaningfully make an impact on childhood lead poisoning in their communities.

Methodology to Determine Funding Needs. The Administration used FTE and salary estimates for each of the six activities that they identified as being new. Local health departments, however, do not break down or submit costs on a per activity basis. Further, we are unaware of a survey or request to local health departments to assist with estimating costs for existing activities, the reduced blood lead level, and new primary prevention tasks. We hope to further engage the Administration to ensure that the funding approved accurately reflects the costs of local administration of the program.

California local health departments are committed to protecting children from the harmful effects of lead exposure. We appreciate the Administration's goal of increasing funding for the administration of this program and look forward to working with the Administration and Legislature to ensure that funding is sufficient to carry out the requirements of the program.

Should you have any questions, please contact me at mgibbons@cheac.org or 916-327-7540. Thank you.

Respectfully,

As signed by

Michelle Gibbons
Executive Director

cc: Honorable Members, Assembly Budget Subcommittee No. 1
Andrea Margolis, Consultant, Assembly Budget Subcommittee No. 1
Eric Dietz, Consultant, Assembly Republican Caucus
Joe Stephenshaw, Director, California Department of Finance
Mark Ghaly, Secretary, California Health and Human Services Agency
Tomás Aragón, Director, California Department of Public Health
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