



**County
Health Officials
of New York**
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SUPPORTS

A.3899/S.3941 (Morelle/Hannon)

AN ACT to amend the public health law, in relation to granting schools access to a student's blood lead level test results in the statewide immunization information system

The New York State Association of County Health Officials (NYSACHO) supports the above-referenced legislation, which would allow schools to access student blood lead level information entered into the New York State Immunization Information System (NYSIIS) registry.

There is no safe level of lead exposure; even small amounts can adversely affect health, learning and behavior. Children with a history of lead exposure are at higher risk of a multitude of health problems that impact their ability to learn. These include developmental delays, IQ loss, ADHD symptoms, auditory processing problems, and greater difficulty in learning than other children.

Primary prevention of exposure to lead sources remains the gold standard for public health. Efforts should be made to improve compliance by providers with mandated lead testing requirements, because remediation of the source and early intervention for children with elevated Blood Lead Levels (BLLs) is critical when exposure occurs. In addition to primary prevention, a Centers for Disease Control and Prevention (CDC) 2015 report identifies educational interventions for children affected by lead. The report recommends that schools closely monitor children with a history of lead exposure and provide them with appropriate educational resources early on to overcome any subsequent learning problems that may have resulted from the exposure.

NYS regulations require schools to obtain evidence of BLL testing when a child enrolls but presently, no easy mechanism exists for schools to collect this information. Similarly, NYS Head Start programs have a federal requirement to obtain evidence of BLL testing for all enrolled children. Again, they have difficulty obtaining this information. The NYS Health Appraisal Form includes space for a notation indicating if a child has been tested for lead and whether BLL was elevated, but this data is often missing or incomplete. If schools do not know which children have been exposed to lead, they cannot know which children's educational progress to monitor.

NYSIIS offers schools access to immunization information in NYSIIS, but the current statute does not authorize schools to access students' blood lead levels (BLLs) in NYSIIS. With NYSIIS BLL access schools can obtain the entire history of BLLs for a child instead of using information only from the current healthcare provider, which may be incomplete.

New York City provides BLL access to schools through their City Immunization Registry (CIR) No problems have resulted. Schools must adhere to the Family Educational Rights and Privacy Act (FERPA) regulations regarding the confidentiality of this and other medical information.

Preventing lead exposure in children will always be the first goal of public health. When exposure occurs and results in elevated BLLs, these children should be provided the best support possible to overcome any resultant learning problems. Allowing schools access to students' BLL data in NYSIIS will give them the necessary data to focus efforts on assessing children's educational needs and initiating educational interventions as early as possible. For all the reasons stated here, we support this legislation and recommend it be enacted into law.

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