February 4, 1997

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Dear Bernie:

Many thanks for faxing me a copy of the 1-30-97 e-mail message from Eric Juzenas at APHA. As you surmised, the message does provoke me to explore the issues, distribute a few copies, and generally spread the gospel in order to insure that people are on the path of enlightenment, ---- in my curmedgeonly style, as our friend Charles Schade would say.

As you know, I started out in public health with the job title of Sanitarian, and held various Sanitarian titles for the first few years of my career. (I am aware that you also entered the field of public health as a Sanitarian.) The term sanitarian is a job title, and is not a profession. It is being decreasingly used as other job titles such as environmental specialist, environmental scientist, environmental health scientist, environmental health manager, environmental manager, environmentalist, etc. are more descriptive and widespread. To many, the title sanitarian is de-limiting, does not indicate the complexity and scope of the field of environmental health and protection, and tends to narrow the field of endeavor to traditional roles in food sanitation, water sanitation, insect and rodent control, nuisance abatement, liquid waste disposal, etc. It is not commonly used by personnel involved in water pollution control, air pollution control, public water supplies, radiation protection, occupational health and safety, noise pollution control, hazardous waste management, solid waste management, etc. Very few environmental health and protection personnel employed by the lead state environmental health and protection agencies use the title sanitarian. The title is still use by a number of USPHS personnel, but the USPHS would be well advised to change their terminology to something like environmental health officer. It is probable that the majority of environmental health and protection personnel using the title sanitarian are employed by local health departments.

Environmental health and protection is the art and science of protecting against environmental factors that may adversely impact human health or the ecological balances essential to long term human health and environmental quality. Such factors include, but are not limited to air, food, and water contaminants: radiation; toxic chemicals; wastes; disease vectors; safety hazards; and habitat alterations.

Environmental health and protection professionals are those who have been educated in the various environmental health and protection technical areas, as well as in epidemiology, biostatistics, toxicology, administration and public policy, risk assessment, risk communication, public health assessment, risk management, environmental law, and environmental finance. They are usually graduates of an academic program or school accredited by the National Environmental Health Science and Protection Council or the Council on Education for Public Health.

The field of environmental health and protection, like the field of public health, is not a profession or a discipline, but is an endeavor engaged in by a broad array of disciplines and professions such as biologists, engineers, chemists, physicists, administrators, attorneys, epidemiologists, biometrists,

geologists, hydrogeologists, entomologists, physicians, sociologists, political scientists, public policy analysts, meteorologists, limnologists, etc., etc.

I know that you are aware that I am purposely using the terminology environmental health **and** protection rather than environmental health **or** environmental protection. To an undesirable extent, the two terms have become separated and utilized to denote programs based on organizational settings (turf) rather than on logical or definable differences in programs, missions, or goals. This distinction is artificial and has led to inappropriate organizational separation of activities that share the common goals of protecting the public's health and enhancing environmental quality. The separate terminologies have created organizational barriers rather than building essential bridges between and among the numerous organizations involved in the struggle for environmental quality. It would be amusing if it weren't sad to note that **many programs are (have been) termed environmental health until they are (have been) moved from a health department (or the USPHS) and then they suddenly become something different ---lo and behold, --- environmental protection!**

It has been documented that some 85 to 90% (and growing) of environmental health and protection programs and personnel at the state level are now the responsibility of agencies other than health departments. Environmental health and protection is the largest component of the field of public health and may account for approximately half of the expenditures of the total field of public health --- at least at the state levels. There are no data to reach any conclusions at the local levels.

In this regard, the APHA Program Development Board developed definitions that are both useful and instructive:

A "health department" is an agency of government that includes the words "health department" in its title and is charged with delivering identifiable services designed to prevent or solve health problems.

A "health agency" is an agency of government charged with delivering identifiable health services designed to prevent or solve health problems.

Interesting? Obviously those groups and agencies wishing to deal with environmental health and protection must get their collective heads out of the sand, their feet out of the shackles of tradition, and look beyond health departments and beyond the term environmental health. (Loyalty to a petrified opinion never broke a chain or freed a human soul.) (But as Bill Foege said, There is an incubation period for ideas as well as for viruses.) I am aware that a few individuals have erroneously used the separate terminologies of environmental health and environmental regulation. Hell, every environmental health and protection program has a regulatory component --- whether its food protection, or water pollution control. Environmental health and protection support services such as epidemiology, laboratory, and risk assessment are not regulatory.

Contrary to the opinion of those lacking in institutional memory, APHA was never a professional home for sanitarians. Until relatively recently, the now APHA Section on Environment was the APHA Engineering Section and was run by the various State Sanitary Engineers. Sanitarians were tolerated. More recently we (Wes Gilbertson, Mort Hilbert, Tom Gable, and I) planned and gained approval to change the title of the Engineering Section to Section on Environment with the hope of attracting more professionals in environmental health in addition to environmental health professionals. (This has never

worked as most environmental health and protection personnel gravitate to other national groups which they feel better represent their interests --- often their rather narrow disciplinary interests.)

About the same time I chaired the Conference of Municipal Public Health Engineers, we changed its name to Conference of Local Environmental Health Administrators in order to welcome personnel in addition to public health engineers. I can't resist noting that in 1944, J. Lloyd Barron, the highly respected Chairman of the Conference of Municipal Public Health Engineers, wrote: "...a capable engineer, in an administrative and technical capacity, is vitally necessary to the work and progress of sanitarians in such a department. ... sanitarians will not reach their full effectiveness, nor receive their proper recognition or adequate or just salaries until they function generally under well qualified engineers. ... to open the Conference to an associate group (the sanitarians) would have negligible value to the associate group from the standpoint of the possibilities of attendance and participation, and it would seem to me to have decided disadvantages for the Conference members." In 1946 Barron further wrote: "...local, state, and regional groups of sanitation personnel, particularly sanitarians, should be encouraged to depend on local (emphasis added) meetings and programs for their principal contacts and exchange of ideas." Barron and others were also the leaders in the APHA Engineering Section, and obviously did not welcome sanitarians.

A few years ago, CLEHA members perceived they were being not being properly supported by APHA, so CLEHA moved to meeting with NEHA --- for right or wrong, for good or bad.

I have detailed the foregoing only to emphasize that APHA was never a professional home for sanitarians as we now know them. Early day sanitarians were a different group and included such public health leaders as William Thompson Sedgwick after whom APHA named its oldest and most distinguished award. Sedgwick was one of many early day public health leaders who were respectfully referred to as sanitarians. These men were the leading distinguished scientists, educators, and researchers of that era in the field of sanitary science.

With further regard to the e-mail --- while I have great respect for the Indian Health Service and its many fine personnel, it does not qualify as "the largest repository of environmental public health expertise in the United States." The IHS has a large number of fine environmental health and protection personnel, but not as many as several large state environmental health and protection agencies (Cal EPA and many others). And regrettably, the scope of responsibilities and risk management activities of the IHS is rather narrow as compared with the scope of the field of environmental health and protection and that of many environmental health and protection agencies.

And again back to the ranch with regard to the e-mail --- activities that National Center for Environmental Health might develop:

- · Deal with **all** the major state and local agencies responsible for delivering environmental health and protection services --- not just health departments and the 5 or 10% of the services they deliver.
- · Help improve capacity in **various programs and schools** educating environmental health and protection professionals.
- \cdot Constructively relate to such groups as the Environmental Council of the States --- which represents the lead environmental health and protection directors from every state.

- · Training, program assistance, consultation, demonstrations, grants and contracts with state and local environmental health and protection agencies to aid personnel in:
 - · Developing an understanding of the **nature and scope of the field of environmental health and protection,** not just the turf controlled by any single federal agency.
 - · Understanding the scope of environmental health and protection programs.
 - · Appreciating the number, scope, and complexity of the spectrum of federal, state, and local agencies involved.
 - · Environmental epidemiology competency.
 - · Toxicology competency.
 - · Risk assessment competency.
 - · Public health assessment competency.
 - · Risk communication competency.
 - · Risk management competency.
 - · Data needs and sources knowledge.
 - · Problem identification, definition, and quantification competency.
 - · Problem prioritization competency.
 - · Program design competency.
 - · Political process competency.
 - · Public policy analysis, development, and implementation competencies.
 - · Program and agency administration -- budget, personnel, program planning, and organizational behavior competencies.
 - · Marketing environmental health and protection services competency.
 - · Environmental law competency.
 - · Competency and measures to plan for environmental health and protection as basic prevention measure involving land-use planning, transportation planning, planning for resource development and utilization, planning facility and product design. (A disproportionate percentage of effort is spent solving problems after they have been created -- putting corks in smoke stacks after the power plant is built).

- · Competency to build and travel bridges with, to, between, and among all other groups and agencies involved in the struggle for a healthy environment.
- · Interaction with academia --- education, research, service, internships, adjunct appointments, guest lectures, etc.

Attention to the foregoing would be a significant step in improving competencies (arms) for the field of environmental health and protection practice --- All armed prophets have been victorious, and all unarmed prophets have been destroyed.

Bernie, aren't you sorry you faxed me?

Best personal regards,

Larry Gordon Visiting Professor