CLIAC Meeting Public Comment Registration Form

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Issue Blood lead proficiency testing limits

PUBLIC COMMENT FORM

Marissa Scalia Sucosky

- HHLPPB is committed to protecting and improving children's health
- Public health action level set at 10 mcg/dL, but no level of lead identified as "safe"
  - Most states begin their case management or initiate environmental assessments at 10 mcg/dL, but with such a wide error margin currently allowed around a result, a 15 mcg/dL could really be as high as 19 mcg/dL or as low as 11 mcg/dL. This raises even more questions at levels lower than 10 mcg/dL where most programs don't initiate case management. A concentration reported as a 6 mcg/dL could truly be at a level that the program would want to enroll the child to prevent further harm and ameliorate identifiable hazards.
  - As more evidence is generated of the harm at levels lower than 10 mcg/dL, we need narrower error margins around measurements at these low blood lead levels to meet the public health needs.