May 25, 2022

Richard Moore
Chair
White House Environmental Justice Advisory Council
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Peggy Shepard
Chair
White House Environmental Justice Advisory Council
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Public Comment Relevant to Federal Disaster Preparedness, Relief, and Community Resilience

Dear Chairs Moore and Shepard,

The American Academy of Nursing (Academy) appreciates the opportunity to offer comments regarding federal disaster preparedness, relief, and community resilience to the White House Environmental Justice Advisory Council (WHEJAC). We applaud the Biden Administration for committing to make environmental justice part of its priorities. The Academy serves the public by advancing health policy through the generation, synthesis, and dissemination of nursing knowledge. Academy Fellows are inducted into the organization for their extraordinary contributions to improving health locally and globally. With more than 2,900 Fellows, the Academy represents nursing’s most accomplished leaders in policy, research, administration, practice, and academia.

The vision of the Academy is Healthy Lives for All People. To actualize this vision, the Academy’s mission is to improve health and achieve health equity by influencing policy through nursing leadership, innovation, and science. We hope you will find these comments useful as the WHEJAC collates recommendations to the Council on Environmental Quality (CEQ) and to the White House Environmental Justice Interagency Council (IAC) related to issues of environmental justice and pollution reduction, energy, climate change mitigation and resiliency, environmental health, and racial inequality. Please note our comments are reflective of questions one through three circulated by WHEJAC.

Questions 1 and 2 – What type of support is needed for disadvantaged communities to participate in Federal disaster preparedness or relief programs? How can Federal disaster relief and aid programs better serve disadvantaged communities that have historically received fewer Federal benefits?

We applaud the Administration’s commitment to Justice40 initiative, which ensures that at least 40 percent of the overall benefits from federal investments in climate change and clean energy are distributed to disadvantaged communities.\(^1\) It is vital that environmental justice communities in need of disaster preparedness and relief programs are prioritized. In addition, the funding and resources from these programs must be prioritized before, during, and after disasters for these communities.

The Academy urges the WHEJAC recommend these disaster preparedness and relief programs consult with stakeholders from within the community in order to ensure the assistance provided is based on what the community truly needs. It will be vital that criteria be developed through initiatives such as the Environmental Protection Agency’s EJScreen\(^2\) or other programs to accurately identify the disadvantaged communities that would benefit from these programs. Considering potential multiple barriers will be critical as communities and their experiences with relief programs varies greatly. In particular, the Academy recommends WHEJAC consider the historic issues of environmental racism that have prevented the ability to build trust with federal programs.
Question 3 – What process steps and information would help eliminate these disparities?

As WHEJAC considers recommendations to CEQ and IAC, we recommend the Council consider if these programs will build and strengthen community capacity for preparedness and recovery to eliminate these disparities. This will require the programs to actively engage with the community and stakeholders in the development of this funding opportunity. Every community is different and by seeking input from the communities, these programs will be better able to direct what is best needed for each individual community. The Academy encourages WHEJAC to also consider that the adoption of all policies impact overall health and well-being. This will be important in the development of process and information within the program to eliminate these disparities. We also recommend WHEJAC consider and prioritize how prevention of environmental and health risks to these communities could impact health and well-being as well. The Academy also encourages WHEJAC to incorporate information sharing so that these programs can evaluate what is working in communities that may benefit other similar communities. Collaboration within and amongst preparedness and relief programs, stakeholders, and communities will be vital as WHEJAC develops the process steps and information to help eliminate these disparities.

The Academy urges WHEJAC to involve climate informed health care professionals, including nurses, as stakeholders to partner with in the development of strategies, guidance, and recommendations for disaster preparedness and relief. Nurses are trusted messengers of health information and serve as essential personnel during responses to natural disasters. Public health nurses in particular, improve the health of vulnerable populations, entire communities, and many focus on population health specifically. These skilled and specialized nursing professionals will be able to offer great insight to WHEJAC in this process.

The Academy thanks WHEJAC for the opportunity to provide comments regarding federal disaster preparedness, relief, and community resilience. If we can be of any assistance to you or your staff, offer the expertise of nurses working in the field of environmental health, please do not hesitate to contact the Academy’s Senior Director of Policy, Christine Murphy, at cmurphy@aannet.org or 202-777-1174.

Sincerely,

Kenneth R. White, PhD, AGACNP, ACHPN, FACHE, FAAN
President
American Academy of Nursing

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