



Office of Health & Science  
PO Box 47890  
Olympia, WA 98504-7890

August 26, 2024

Jeffrey M. Zirger  
Agency for Toxic Substances and Disease Registry (ATSDR)  
Department of Health and Human Services  
1600 Clifton Road NE, MS H21-8  
Atlanta, Georgia 30329.

**Re: Assessment of Chemical Exposures (ACE) Investigations Docket No. ATSDR-2024-0002**

Dear Mr. Zirger,

The Washington State Department of Health (WA-DOH) offers the following comments in response to the proposed information collection project on the Assessment of Chemical Exposures (ACE). As a public health agency, WA-DOH sees the value of this tool for performing rapid epidemiological assessments to assist State, regional, local, or Tribal health departments to respond to or prepare for acute environmental incidents. A summary of comments and recommendations below.

**General Comments**

1. WA-DOH recommends doing outreach to potential requesting agencies (including but not limited to other federal public health agencies, state/local/tribal health) to increase awareness of this tool, including when and how it can be used. This should include a having a clear and easy procedure for agencies to request an ACE, and making an ACE quick to implement, as many state and local agencies will not be aware of this tool unless they have had previous related issues.
2. WA-DOH has concerns regarding the online format and self-administered aspects of the surveys. Online surveys will only be available to those who have a device that is able to access the internet and/or those that have internet access. This may introduce bias into the survey responses and exclude certain populations from accessing/completing the survey such as such as low-income, rural, and older individuals. WA-DOH recommends ATSDR considers and is transparent in how this affects results.

**Recommendations about the online survey**

WA-DOH agrees with the addition of questions related to functional disabilities and maternal and child health. Further, WA-DOH recommends that members of the disability community and advocates for maternal and child health are provided an opportunity to provide input on the questions.

Regarding the replacement mental health screeners, WA-DOH recommends the replacements are validated tools that have been field tested.

Regarding the addition of qualitative questions, WA-DOH recommends clearly outlining how the qualitative data will be used to assess chemical exposure. There are concerns around the burden, time, and expertise it takes to analyze qualitative data. Therefore, WA-DOH recommends providing training or guidance on best practices for incorporating mixed methods analysis, as well as software recommendations to be used for qualitative analysis as agencies may need to procure specific software to analyze these data.

Additional survey recommendations include:

- **Language access.** WA-DOH recommends ATSDR ensure that the online survey is translated appropriately and meets the language needs of the community.
- **Low completion rate.** WA-DOH recommends shortening the time it takes to complete the survey. A 60-minute-long survey will likely be seen as a high burden to potential respondents, resulting in a decreased response rate.
- **Accessibility standards.** WA-DOH recommends taking steps to ensure the participation of people with disabilities (e.g. using tools such as screen readers for people with visual impairment).
- **Alternative modes for completion.** WA-DOH recommends the development of alternative ways to complete the survey if someone is unable to complete it online due to disability or lack of internet access.
- **Sample size.** WA-DOH recommends ensuring that there is a way to know how many households/individuals are sent the survey, how many fill it out, and how representative those two samples are of the impacted community.
- **Standardization.** WA-DOH recommends that requesting agencies can choose the questions to be included. If this is not possible, WA-DOH recommends transparency around this issue when doing outreach to agencies.

Thank you for the opportunity to contribute to this request for information. If you have any questions, please contact DOH's Federal and Regulatory Affairs Director, Michael Ellsworth at [Michael.Ellsworth@doh.wa.gov](mailto:Michael.Ellsworth@doh.wa.gov) or Governor Inslee's Director of Federal & Inter-State Affairs, Rose Minor at [rose.minor@gov.wa.gov](mailto:rose.minor@gov.wa.gov).

Sincerely,



Tao Sheng Kwan-Gett, MD MPH  
Chief Science Officer  
Office of Health and Science  
Washington Department of Health