



Advocacy, Education & Outreach

Service to individuals with disabilities and their families for over 50 years

Mary Ellen Mayo, RN, MS, President
Leo V. Sarkissian, Executive Director

The Arc of Massachusetts

217 South Street
Waltham, MA 02453-2769

Phone: (781) 891-6270

Fax: (781) 891-6271

Email: arcmass@arcmass.org

Website: www.arcmass.org

Memorandum

To: John Auerbach, Commissioner, Massachusetts Department of Public Health
From: Evelyn Hausslein, M.M.H.S., Chair, The Arc of Mass. Government Affairs Committee
Date: November 27, 2007
RE: Proposed Amendments to Ban Leaded Toy Jewelry under 105
CMR 650.000: Hazardous Substance Regulations

I submit the following comments on behalf of The Arc. Collectively, with other state Arcs, The Arc of the United States, is ranked by Forbes Magazine as the country's 10th largest charitable organization. The Arc of the United States advocates for federal policies including special education, employment, housing, and health care. Founded over 50 years ago, The Arc of Massachusetts represents the interests of over 120,000 children and adults with specific intellectual and developmental disabilities. At the local level, we work with communities, families, and individuals to advance social inclusion, education, employment, and community living through our 20 chapters located throughout the Commonwealth.

Prior to my involvement with The Arc, I was privileged to serve as Dean of the Wheelock College Graduate School, where I taught Early Childhood Education, but it is in my role as parent that I wish to address the subject of the Department's proposed regulatory changes.

When my son was diagnosed with a developmental disability over 30 years ago, the Early Intervention system did not exist in its present form. Through significant change at both the federal and state level, we have developed and nurtured both E.I. and Special Education to a point few would have dreamed possible when I first learned of my son's disability.

While I continue to work on increasing the level of resources available to families so that individuals may achieve their full potential, I am cognizant that others may feel these expenditures are excessive. Today I do not believe Massachusetts residents are truly prepared to sacrifice the amount of revenue necessary to rollback the state income tax to 5%. However, we must remember that it was only seven years ago that voters passed Question 4, the biggest tax cut in Massachusetts history.

Unfortunately, because we are so frequently REACTING to crisis involving services contingent upon scarce tax dollars, we sometimes forget the need to invest in systems that will LESSEN the need for such resources. It is in this spirit that I strongly urge MDPH to acknowledge and fully embrace the role that prevention plays in a truly comprehensive state-wide public policy.

Local Chapters: Arc Community Services • Berkshire • Brockton Area • Cape Cod • Central Middlesex • Charles River • East Middlesex
Greater Boston • Greater Fall River • Greater Lawrence • Greater New Bedford • Greater Plymouth • Greater Waltham • Minute Man AHS
Northern Bristol • North Shore • Northern Essex • South Norfolk • South Shore • Southern Worcester • The United Arc

I have learned from working alongside my friend and former collaborator at MDPH, Ron Benham, Director of the Division of Perinatal, Early Childhood and Special Health Needs, that “Big things can and do happen with impact beyond the money that MDPH provides.”

I can think of no other issue for which that statement is more applicable than that of lead exposure and the harm we are still learning it can cause with regard to learning and developmental disabilities, birth defects, reproductive disorders and neurodegenerative disorders.

It is the stated national goal of The Arc to investigate the causes, reduce the incidence, and limit the consequences of mental retardation and related developmental disabilities through education, research, advocacy, technical assistance, and support.

Research findings appear daily indicating cumulative lead exposure is affecting our physiology in a growing number of ways and at different stages of life. No longer is lead exposure an “isolated” hazard, provoking the anxiety of parents concerned with pre-natal and early childhood brain cell damage. Every day brings news that trace amounts at any level are a danger to anyone who lives or works in an environment in which lead is present.

Please do not proceed in a piecemeal fashion in regulating a toxin that we now know causes widespread harm and inevitably, poses such a high cost to society. I encourage the Department to move forward with the most comprehensive and proactive policy possible to protect all Massachusetts residents. If and when the need arises, The Arc stands ready to provide the Department with the full backing of our organization in this effort, through advocacy with the Executive branch, the Legislature, or the courts.

Thank you, very much for your consideration of these comments.