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M. Dennis Knight
2024-2025 ASHRAE President

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April 3, 2025

The Honorable Michael J. Barrett
The Honorable Mark J. Cusack
Chairs
Joint Committee on Telecommunications, Utilities and Energy
Massachusetts Legislature
24 Beacon St.
Boston, MA 02133

Re: H. 3476, "An Act Relative to Healthy and Sustainable Schools"

Dear Chairs Barrett and Cusack:

I am writing on behalf of ASHRAE, the American Society of Heating, Refrigerating, and Air Conditioning Engineers, to provide comments on H. 3476, currently assigned to your committee. **ASHRAE supports the goals of the legislation, which is intended to provide healthy, safe and energy efficient school facilities in Massachusetts.** We applaud these efforts. In particular, we are pleased to see that the bill is focused on infrastructure improvements for HVAC systems in schools and would create a "Healthy and Sustainable Schools Office." Proper design, installation, inspection, and maintenance of HVAC systems are essential to providing good indoor air quality (IAQ).

As a technical society that exists to serve humanity by advancing the arts and sciences of heating, ventilation, air conditioning, refrigeration and their allied fields, we support the inclusion of ASHRAE standards in this bill and also offer recommendations to strengthen the legislation. ASHRAE is a not-for-profit technical and professional society of more than 55,000 members, including more than 1,000 in Massachusetts. ASHRAE develops consensus-based building standards, including those concerning energy efficiency, indoor air quality, and sustainability.

We support the legislation's inclusion of **ANSI/ASHRAE Standard 62.1-2022, *Ventilation and Acceptable Indoor Air Quality***: Standard 62.1 specifies minimum ventilation rates and other measures intended to provide indoor air quality that is acceptable to human occupants and minimizes adverse health effects due to poor IAQ. It defines the requirements for ventilation and air-cleaning system design, installation, commissioning, and operations and maintenance.

We request that the legislation also reference the following ASHRAE standards to bolster its effectiveness:

- **Standard 241-2023, *Control of Infectious Aerosols*:** This standard for buildings focuses on airborne infection risk mitigation. It establishes minimum requirements for building owners, operators and professionals to improve IAQ by reducing the risk of airborne disease transmission by infectious aerosols. Standard 241 is meant to be applied in periods of elevated risk, for example the risk of transmission of pathogens like the SARS-COV-2 virus, which causes COVID-19. Under these conditions, buildings would operate in “Infection Risk Management Mode,” and building operators would have the flexibility to choose between different equivalent clean air options based on what they determine is appropriate for that type of space, along with their specific energy use goals or cost restrictions. This flexibility makes Standard 241 a powerful tool for mitigating transmission risk that can be adapted for specific circumstances.
- **ANSI/ASHRAE Standard 180-2018, *Standard Practice for Inspection and Maintenance of Commercial Building HVAC Systems*:** The use of Standard 180 will help ensure that the improvements made by this program will continue to be well operated and maintained. Standard 180 gives details on how to implement inspection and maintenance practices, a list of the necessary tasks, and includes informative appendices with examples of situations in which a maintenance plan should be reviewed.

Thank you for your consideration of ASHRAE’s comments regarding H. 3476. ASHRAE would be pleased to serve as a technical resource and to answer any questions you might have. We are delighted that Massachusetts is moving forward to improve its school facilities for students, teachers, and staff. ASHRAE looks forward to being a technical resource as you consider this as well as other legislation concerning building systems and their impact on indoor air quality. If you need additional information or would like to be connected to a technical expert, please contact GovAffairs@ashrae.org.

Sincerely,

A handwritten signature in blue ink that reads "M. Dennis Knight". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

M. Dennis Knight
2024-2025 ASHRAE President