



Scott McCallum  
Governor

Phyllis J. Dubé  
Secretary

State of Wisconsin

Department of Health and Family Services

October 30, 2001

To: Group Day Care Licensees  
Day Camp Licensees

BRL – DC - Memo 01-02

From: Patty Hammes, Director *Patty Hammes*  
Bureau of Regulation and Licensing

RE: **SUDDEN INFANT DEATH SYNDROME (SIDS) RISK REDUCTION LEGISLATION**

The purpose of this memo is to inform you of the new Sudden Infant Death Syndrome (SIDS) Risk Reduction provision in state law that passed as part of the 2001-2003 Wisconsin biennial budget act. The new state law requires *all* licensees, child care employees and volunteers working in group child care centers and day camps licensed to care for children under 1 year of age to receive training in the most current medically accepted methods of preventing Sudden Infant Death Syndrome (SIDS). This new law took effect on September 1, 2001. This memo provides information on the steps that must be taken to implement the new law. The Bureau of Regulation and Licensing has begun the process of promulgating rules to place these provisions in the rule. Under current rule {HFS 46.04(2)(a) and HFS 55. 41(1)(a)}, group day care and day camp licensees are required to comply with all applicable statutes. Please share this information with all employees, volunteers and parents.

***Current Licensees, employees and volunteers***

The new law requires that child care employees and volunteers receive training in SIDS risk reduction procedures **prior to providing care** in a center licensed to care for children under one year of age or **becoming licensed to care** for children under one year of age. However, we believe that in order to protect the children in care, all persons currently caring for children in a group center or day camp licensed to care for children under 1 year of age must be trained in these procedures and centers must share this information with parents. The Bureau of Regulation and Licensing has been working with the Technical Colleges and the agencies offering DHFS approved courses, the Infant Death Center of Wisconsin, and the Child Care Resource and Referral agencies to ensure that information about SIDS risk reduction has been added to all entry level courses and that other workshops in SIDS risk reduction are available.

- **Effective immediately**, any person caring for children in a group day care center or day camp currently licensed for children 1 year of age and younger must obtain training in SIDS risk reduction procedures within the next six months (by May 1, 2002) unless s/he has taken an infant/toddler or other entry level course since September 1, 2001 or can document that they have received SIDS risk reduction training previously. This training may be offered through the Technical Colleges, Child Care Resource and Referral Agencies, the Infant Death Center of Wisconsin, or others. This training can be counted as continuing education.
- All group centers and day camps must include information in their health policy relating to the steps that they will take to reduce the risk of SIDS. The health policy should follow current SIDS risk reduction methods and at a minimum include infant sleep position, safe cribs, placing babies on a firm mattress, removing soft items from the crib, keeping the infant's head uncovered during sleep and use of "tummy time" for non-mobile awake children in care. The current guidelines for child care centers developed by the American Academy of Pediatrics and American Public Health Association on infant sleep position and surroundings are enclosed for your reference along with other SIDS risk reduction resources. The health policy must be revised by January 1, 2002 and this information must be shared with staff and all parents of children younger than 1 year of age. A copy of the revised policy must be sent to your licensing specialist the next time your license is continued.

### ***New employees or volunteers***

The new law requires that child care employees and volunteers must receive training in methods of preventing SIDS prior to providing care in a center licensed to care for children under one year of age or becoming licensed to care for children under one year of age. New employees and volunteers must receive training on current methods of SIDS risk reduction as follows:

- For new employees and volunteers beginning work on or after September 1, 2001, that person must receive an orientation on SIDS risk reduction procedures. The orientation must be provided to employees prior to working with children. All other items required for orientation under HFS 46.05 (2)(a) and HFS 55.42(2)(a) must be completed within the time frames specified in the rule.
- New employees and volunteers must complete the entry-level training as required under HFS 46.05(1), HFS 46.09(1)(e) or HFS 55. (2)(b) within the time frames indicated in the rule. Those who offer this training must include current SIDS risk reduction methods to be approved as meeting the entry-level training requirements noted above. If this training was completed prior to September 1, 2001, training in SIDS risk reduction must be completed within 6 months after beginning work.

### **Steps that Centers and Day Camps Must Take to Implement New SIDS Risk Reduction Requirements:**

In addition to revising the health policy, all centers and day camps must revise their orientation policy to include orientation to SIDS risk reduction policies and procedures by January 1, 2002. It must be noted in the revised policy that this portion of the orientation must be completed prior to the employee or volunteer starting to work with children. The revised orientation policy must be submitted to your licensing specialist at license continuation.

The center's orientation training relating to SIDS prevention must, at a minimum, include the following SIDS risk reduction methods currently recommended by the American Academy of Pediatrics and American Public Health Association:

- Place infants under 12 months of age on their backs in a crib to sleep (some infants might have health conditions that might require them to sleep on their tummy or side as specified by a child's physician due to breathing, lung or heart problems or other medical problem).
- Use a safe crib--babies should sleep in a crib on a firm tight-fitting mattress and there should be no soft blankets or comforters under the baby. Remove pillows, quilts, comforters, stuffed toys and other soft items from the crib.
- The baby should never sleep on a waterbed, sheepskin, pillows, or other soft surfaces. Soft toys should not be kept in the crib.
- If a blanket is used, the infant should be placed at the foot of the crib with a thin blanket tucked around the crib mattress, reaching only as far as the infant's chest. Keep the infant's head uncovered during sleep.
- Provide "tummy time" for awake non-mobile children.

### **What is Sudden Infant Death Syndrome and How Do We Reduce the Risk of SIDS?**

Sudden Infant Death Syndrome (SIDS) is the leading cause of death in the United States for infants one month to one year of age. Nobody knows exactly what causes SIDS or why it happens. Most deaths from SIDS take place before the end of the sixth month of age. Based on current research, the American Academy of Pediatrics strongly recommends that infants be placed on their backs to sleep to reduce the risk of crib death (SIDS). Research has shown that placing children on their backs to sleep has resulted in a reduction of the number of deaths attributed to SIDS. The tummy down or side sleep position is not recommended except on the specific direction of a physician because of certain health conditions. **One of the most important things that you and parents can do to help reduce the risk of SIDS is to put babies on their backs to sleep.**

The highest risk period for SIDS appears to be when infants are between 2 months and 5 months old. This coincides with the time that most working mothers return to their jobs after childbirth. According to an article in the Child Care Information Center Newsletter – Issue 39, a new study suggests that about 20% of SIDS cases (in the 11 states included in the study) occurred in child care facilities, most commonly in family child care settings. Previous research has shown that babies routinely placed on their backs to sleep are 20 times more likely to die

from SIDS if they are switched to their stomachs to sleep. Researchers theorize that those children who sleep on their backs are more vulnerable when placed to sleep on their tummies because they haven't developed their upper-body strength as early as stomach sleepers have. This makes it even more important for all child care providers to communicate with parents about the importance of placing infants to sleep on their backs in order to reduce the risk of SIDS. Providers also need to recognize that upon the advice of the child's physician a parent may choose tummy or side sleep position for an infant due to their child's medical condition.

In 1997, as a SIDS risk reduction measure and to assure parental awareness regarding sleep position and SIDS risk reduction, the Bureau modified the Intake Form for Infants and Toddlers (CFS - 61). This form provides information necessary to coordinate the care a child receives at home with the care provided in the child care setting. It must be completed and returned to the provider prior to the child's first day of attendance at the center. The provider must review the information provided and communicate with parents about this information to ensure a smooth transition for the child. One of the items included in the sleep section of the intake form is a question about sleep position. Parents must indicate the sleep position of the child and if the parent chooses a sleep position other than the child's back, the provider must supply information to the parent about SIDS risk reduction and back sleep position by providing the **Back to Sleep** brochure. In a small number of instances, a child's doctor may specify a side or tummy sleep position due to a child's health condition. The **Back to Sleep** brochure was recently revised to include additional information about SIDS risk reduction procedures. This brochure must be shared with parents choosing a sleep position other than the child's back and it is strongly recommended that you share it with all parents of children under 1 year. Children should be placed to sleep in the position chosen by the parent.

The United States Consumer Products Safety Commission (US CPSC) in conjunction with Mattel, Inc. recently launched a campaign to alert caregivers to the dangers of soft bedding in cribs, play pens and portable cribs and to provide information on SIDS risk reduction. All cribs and playpens should meet the CPSC guidelines and are actually the safest places for infants to sleep. In addition to placing a child to sleep on his/her back, another thing that providers **must** do to help reduce the risk of SIDS is to make sure that the baby sleeps on a firm tight-fitting mattress with his/her head uncovered. There have been instances where a baby has smothered while sleeping because their flow of air has been restricted. Infants should not sleep on waterbeds. Pillows, quilts, comforters, sheepskins, and other soft products should be removed from the crib. Crib sheets should fit the mattress snugly and corners should not pull loose if a child squirms. All of these things can cause a child's mouth and nose to be covered which may lead to suffocation.

#### **Resources for SIDS Risk Reduction Methods**

I am enclosing a SIDS risk reduction fact sheet that can be used in conjunction with the **Back to Sleep** brochure, also enclosed to give parents and providers more information regarding SIDS risk reduction. The **Back to Sleep** brochure and other SIDS risk reduction information is available through the Wisconsin Child Care Information Center (CCIC). You can contact them at 1-800-362-7353 to order the **Back to Sleep** brochures and ask for a list of resources. The **Back to Sleep** brochure is now available in a Spanish version and African American version. Additional copies are available free of charge from CCIC. A new Resource Kit for Reducing the Risk of SIDS in African American Communities is available and can be ordered at 1-800-505-CRIB (2742). For additional information, we recommend contacting the National SIDS & Infant Death Program Support Center at (800) 638-7437 (<http://sids-id-psc.org/>) or the U.S. Consumer Products Safety Commission at 1-800-638-2772 (<http://www.cpsc.gov/index.html>). Our web site ([www.dhfs.state.wi.us](http://www.dhfs.state.wi.us) click on licensing then click on child care) has links to these web sites and the Wisconsin Department of Agriculture, Trade and Consumer Protection that publishes a monthly recall update. Also available on our web site are copies of some of the DCFS forms.

Thank you for the important work that you do as child care professionals and implementing these SIDS risk reduction measures for our youngest children. If you have questions, please contact your licensing specialist.

Enclosures

c: BRL Licensing Chiefs/Deputies/Specialists; Interested Parties

## SUDDEN INFANT DEATH SYNDROME (SIDS) RISK REDUCTION METHODS

### What Should an Infant Sleep Position Policy Say?

The American Public Health Association and the American Academy of Pediatrics have written guidelines for child care centers called *Caring for Our Children--National Health and Safety Performance Standards: Guidelines for Out-of-Home Child Care Programs*. They suggest using the following guidelines regarding infant sleep position and surroundings:

- Infants under 12 months of age shall be placed on their backs on a firm tight-fitting mattress for sleep in a crib.
- Waterbeds, sofas, soft mattresses, pillows, and other soft surfaces shall be prohibited as infant sleeping surfaces.
- All pillows, quilts, comforters, sheepskins, stuffed toys, and other soft products shall be removed from the crib.
- If a blanket is used, the infant shall be placed at the foot of the crib with a thin blanket tucked around the crib mattress, reaching only as far as the infant's chest.
- The infant's head shall remain uncovered during sleep.

(Caring for Our Children, Standard FA 190A)

- Unless the child has a note from a physician specifying otherwise, infants shall be placed in a supine (back) position for sleeping to lower the risk of Sudden Infant Death Syndrome (SIDS).
- When infants can easily turn over from the supine to the prone position, they shall be put down to sleep on their back, but allowed to adopt whatever position they prefer for sleep.
- Unless a doctor specifies the need for a positioning device that restricts movement within the children's crib, such devices shall not be used.

(Caring for Our Children, Standard HP 006)

\*This is excerpted from "Sudden Infant Death Syndrome and The Child Care Provider Setting Policy on Infant Sleep Position" of the National SIDS & Infant Death Program Support Center (NSIDPSC). The NSIDPSC is a cooperative project of the SIDS Alliance, Inc. and the Health Resources and Services Administration's (HRSA) Maternal and Child Health Bureau (MCHB) Sudden Infant Death Syndrome/Infant Death Program.