CCDF HEALTH AND SAFETY REQUIREMENTS FACT SHEET: Reducing the Risk of Sudden Infant Death Syndrome and Using Safe Sleeping Practices

New Federal Requirements

The Child Care and Development Block Grant Act of 2014 includes provisions related to health and safety requirements for all providers that receive payment from the Child Care and Development Fund (CCDF).¹

(I) Health and Safety Requirements.- The plan shall include a certification that there are in effect within the State, under State or local law, requirements designed to protect the health and safety of children that are applicable to child care providers that provide services for which assistance is made available under this subchapter. Such requirements

(ii) shall relate to matters including health and safety topics consisting of

(II) prevention of sudden infant death syndrome and use of safe sleeping practices;

Caring for Our Children (CFOC) Standards

Caring for Our Children: National Health and Safety Performance Standards; Guidelines for Out-of-home Child Care, 3rd Edition (2011), includes more than 600 performance standards or promising practices for child care facilities and is often used by state regulatory agencies when they are revising provider requirements.² In June 2015, Caring for Our Children Basics: Health and Safety Foundations for Early Care and Education (CFOCB) was released by the Administration for Children and Families, U.S. Department of Health and Human Services. CFOCB represents the minimum health and safety standards experts believe should be in place where children are cared for outside of their homes.³

¹ The Child Care and Development Block Grant Act of 2014 and section 418 of the Social Security Act (42 USC 618), as amended, provide the statutory authority for implementation of the CCDF program as designated by ACF. Retrieved from http://www.acf.hhs.gov/programs/occ/resource/ccdf-law.


The following links to the CFOC standard that pertains to safe sleep practices and reducing the risk of Sudden Infant Death Syndrome (SIDS). The link goes to the full text of the standard, with a rationale supported by research. This standard is also included in CFOCB.

**Standard 3.1.4.1: Safe Sleep Practices and SIDS/Suffocation Risk Reduction**

http://cfoc.nrckids.org/StandardView.cfm?StdNum=3.1.4.1&


**Trends in Child Care Licensing**

The following table provides information about the percentage of States that have requirements for safe sleep practices and SIDS prevention in their licensing regulations for child care centers, FCC homes, and group child care homes.

In 2014, most States require providers to place infants on their backs to sleep. The inclusion of this requirement has increased significantly in the last decade. The number of States that prohibit soft bedding in cribs and require specific training in safe sleep practices has also increased.

**Number of States with SIDS Prevention Requirements in Licensing Regulations in 2014**

<table>
<thead>
<tr>
<th>Licensing Requirements</th>
<th>Child Care Centers (N = 53)</th>
<th>FCC Homes (N = 46)</th>
<th>GCC Homes (N = 40)</th>
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<tr>
<td>Infants must be placed on their backs to sleep</td>
<td>47</td>
<td>39</td>
<td>33</td>
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<td>Physicians may authorize different sleep positions for infants</td>
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<tr>
<td>Parents can authorize a different sleep position for infants</td>
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<tr>
<td>Soft bedding/materials must not be used in cribs</td>
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<td>Facilities must use cribs that meet the U.S. Consumer Product Safety Commission requirements</td>
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<tr>
<td>Staff/providers are required to complete training about SIDS prevention</td>
<td>28</td>
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<td>14</td>
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</tbody>
</table>

N = the number of States that regulate the type of facility.

4 “States” includes the 50 States, the District of Columbia, and two U.S. Territories – Guam and the Virgin Islands.

5 These data were collected during 2014 from state child care licensing regulations posted on the National Resource Center for Health and Safety in Child Care and Early Education Web site at http://nrckids.org/index.cfm/resources/state-licensing-and-regulation-information/.
Requirements for License-Exempt CCDF Providers

Most States will allow providers that are exempt from licensing requirements to care for children from families receiving CCDF child care subsidies. These providers are often caring for children in their homes, but have fewer children in their care than the State’s threshold for licensing. When providers are not required to be licensed and meet those standards, some States have established safe sleep requirements for those providers to protect children from harm. Under the new CCDF reauthorization law, all States will have to establish such requirements for license-exempt providers (except for relatives, at State option).

The following are excerpts from a sample of States that have requirements for license-exempt CCDF providers that address safe sleep and SIDS prevention. These States were chosen because they have a comprehensive set of requirements similar to those required for licensed homes.

Arkansas

License-exempt FCC homes (1 – 5 children), relatives caring for children in their homes, and in-home care must complete a registration process to receive CCDF payment. The registration process is conducted by the licensing agency. Homes are inspected prior to registration approval.

Minimum Licensing Requirements for Registered Child Care Family Homes (1/1/2015)

402 Infant & Toddler Program Requirements

6. Infants (children 12 months and below) shall be placed flat on their backs to sleep to lessen the risk of suffocation and Sudden Infant Death Syndrome. (If a child rolls over on his/her own, the facility is not required to reposition the child.) If there is a medical reason a child cannot sleep on his/her back, then a signed statement from the child’s physician must be in the file stating that a different sleep position is indicated.

7. Infants’ sleep space (e.g. crib) shall be free of loose bedding. If light blanket is necessary, it should be kept at or below the mid-chest area of the child. Staff shall not cover the faces of infants.

8. Pillows (including nursing or — “boppy” pillows), bumpers/bumper pads, and stuffed animals shall not be placed in cribs.

1001 Sleeping Arrangement Requirements

1. All manufacturer guidelines shall be followed for furniture and equipment that is used by, or around, children.

2. Any cribs or playpens that have been identified as unsafe, or have been subject to recall as defined by the Consumer Product Safety Commission (CPSC) guidelines or law, shall be removed or repaired as indicated.

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6 Excerpts are copied directly from the States’ regulations and include only the text of the requirements that are relevant to the topic.
3. Each child under twelve (12) months of age shall have a separate well-constructed baby bed or playpen with a waterproof mattress or pad which shall be clean, dry, and in good condition. Sheets and covers are required and shall be kept clean and dry. Bassinets shall not be used.

4. Waterbeds shall not be used for sleeping children under the age of two (2) years.

5. The following guidelines shall also be required for cribs:
   a. Cribs that have end panels with decorative cutout areas shall not be used
   b. Mattresses shall fit snugly in the crib
   c. The space between crib and mattress shall measure no more than 1 inch
   d. Corner post shall be the same height as end panels
   e. End panels shall extend below mattress at the lowest position of the mattress
   f. Baby beds shall have slats no greater than 2 3/8” apart

6. Each child twelve (12) months of age or older shall have a cot, bed, pallet, or mat which shall be placed at least one foot apart. Sheets and covers are required. Bedding shall be of washable material and shall be kept clean. If mats or pallets are used on floors, floors shall be clean, warm, dry, and draft free. Any mat or pallet less than two (2) inches thick shall be placed on carpet.

7. Doors in rooms where children are sleeping shall remain open.

8. Infants & toddlers shall be visually monitored at all times and physically checked regularly for breathing.

9. Swaddling of infants is not recommended and shall require a note from the child’s physician if continued past the age of three months.

10. Bibs, necklaces, and garments with ties or hoods shall be removed from infants prior to rest/naptime to reduce the risk of entanglement and strangulation while sleeping.

11. Children shall not nap on waterbeds, beanbags, or thick rugs.

12. Playpens or cribs shall not be placed near dangling cords.

**Ohio**

As of January 1, 2014, FCC home providers caring for fewer than seven children (Type B Providers) that receive subsidy payment must obtain a state license. County offices of the Department of Job and Family Services monitor providers and the State issues the license. Type B Providers not receiving federal or state funding are exempt from licensing.

*Family Child Care Rules: Type B Licensing Requirements (2013)*
http://emanuals.odjfs.state.oh.us/emanuals/GetTocDescendants.do?maxChildrenInLevel=100&nodeId=%23node-id%28237%29

5101:2-14-19  Sleeping and Napping Requirements for a Licensed Type B Home Provider

(B) Each infant in attendance shall have a separate crib or playpen that meets the following requirements:
Reducing the Risk of SIDS and Using Safe Sleeping Practices

1. Cribs, playpens and mattresses shall be thoroughly cleaned with soap and water and sanitized with an appropriate germicide at least monthly and before use by another child. The sheet shall be changed before use by another child.

2. Cribs and playpens shall be used according to manufacturer’s instructions. The use of the crib or playpen shall be discontinued when the child is able to climb out or reaches the height of thirty-five inches.

3. Cribs and playpens shall be used with the mattress supports in their lowest positions.

4. An infant sixteen months or older may use a cot, pad, or mat with written caretaker permission.

5. The cribs or playpens may be placed in storage in the residence if the infant to which it was assigned is no longer using it.

6. If the use of a crib or playpen is considered hazardous for an infant, regardless of age, the infant may use a cot, pad, or mat with written permission from the caretaker.

7. Each crib and playpen shall be of sturdy construction, and have:
   
   a. Closely spaced bars and with corner posts that do not exceed one sixteenth of an inch above the top of the end panel.
   
   b. Spaces between the bars of the crib or playpen and between the bars and end panels of the crib or playpen shall not exceed two and three-eighths inches.
   
   c. Playpen mesh openings shall be less than one quarter inch.

8. Each crib shall have a firm mattress that is at least one and one half inches thick. Each playpen shall have a firm mattress or pad that does not exceed one inch in thickness.
   
   a. The space between the mattress and the side or end panels of the crib or playpen shall not exceed one and one-half inches.
   
   b. Each mattress shall have a properly fitted clean sheet that is changed at least weekly, and more often as necessary.
   
   c. Each mattress shall be securely covered with a waterproof material which can be thoroughly sanitized and is not dangerous to children. The waterproof cover shall be free of rips or tears.
   
   d. Bumper pads shall not be used.
   
   e. Nothing shall be placed or be hung over the side that obstructs the provider’s visibility of the infant.
   
   f. Infants shall not be placed in cribs or playpens with bibs or any other items which could pose a strangulation or suffocation risk.
   
   g. Infants shall be placed in their cribs or playpens for sleeping, and shall not be allowed to sleep in bassinets, swings, car seats or other equipment. If a medical condition exists where a child needs to sleep in equipment other than a
crb or playpen, written permission shall be obtained from a physician and shall be on file.

(h) Infants shall be placed on their backs to sleep unless the caretaker provides written authorization on the JFS 01930 "Sleep Position Waiver" (rev. 1/2014) signed by the child's physician. The JFS 01930 shall be maintained on file for review. Infants who are able to turn themselves over shall be placed initially on their back for sleeping but allowed to sleep in a position they prefer.

(i) Cribs or playpens shall not be used for storage of toys and other materials.

(C) Any crib manufactured before June 28, 2011 shall have a certificate of compliance (COC) on file to be permitted for use. Providers may have to contact the manufacturer of the crib to receive a COC if they do not request one from the retailer when they purchase the crib. Cribs with a documented manufacture date after June 28, 2011 have to meet the new federal standards to be sold, so they do not require a COC.

(D) Stacked cribs are prohibited.

West Virginia

FCC homes caring for fewer than four children are exempt from licensing. Providers caring for three or fewer children and relatives must voluntarily register to receive CCDF payment. Inspections are conducted by the Department of Health and Human Resources.

West Virginia Department of Health and Human Resources Legislative Rules Title 78, Series 19, Family Child Care Home Registration Requirements (2012)


16.1. Equipment. A family child care home:

16.1.a. Is prohibited, effective December 28, 2012, from using traditional drop side cribs, or any crib manufactured prior to June 28, 2011. A family child care home shall:

16.1.a.1 Only use cribs that comply with the Consumer Product Safety Commission crib standards, and were manufactured after June 28, 2011;

16.1.a.2 Supply separate cribs or portable packs and play yards for infants. Family child care providers shall not use portable packs and play yards for infants able to climb.

16.1.b. Shall not allow infants under thirty-five (35) inches tall to sleep on any type of adult bed or sofa;

16.1.c. Shall not places soft pillows or stuffed animals in infant beds during sleep or nap times;

16.2. Feeding and Care. A family child care home caring for infants and toddlers shall:

16.2.g. Place an infant who is unable to turn over independently on his or her back to sleep unless medical documentation prohibits sleep in that position.
Resources

- Healthy Child Care America has several resources about safe sleep on its Safe Sleep Campaign Web page at http://www.healthychildcare.org/sids.html. The resources include brochures, training materials, and policy and research articles.

- Safe to Sleep Public Education Campaign, led by the Eunice Kennedy Shriver National Institute of Child Health and Human Development, at the National Institutes of Health, U.S. Department of Health and Human Services, has materials about safe sleep at https://www.nichd.nih.gov/sts/Pages/default.aspx.

- Sudden Unexpected Infant Death and Sudden Infant Death Syndrome information is available on the Centers for Disease Control and Prevention Web site at http://www.cdc.gov/sids/index.htm.