

Federal Leaders' Series

Crib Regulations: What You Need To Know!

Webinar

Amanda Bryans: Hi, I'm Amanda Bryans, Director of Education and Comprehensive Services Division at the Office of Head Start. I would like to warmly welcome all of our regional office staff to today's webinar entitled, Crib Regulations, What You Need To Know. This webinar has been developed and produced by the Early Head Start National Resource Center, better known as the EHSNRC on behalf of the Office of Head Start and in collaboration with our colleagues at the Office of Child Care. The information to be discussed today is designed with you in mind to help you increase your knowledge of crib safety standards and to help better support your work with states and programs do their work to maintain safe, durable equipment for the babies in their care.

So why should we be concerned about crib regulations, in what ways can program specialists better support states and programs, after all the regulations have been distributed on a national level so why are we continuing to be concerned with this topic. In our society and in all societies' children depend on adults to create and maintain safe and secure spaces for their growth and development. As federal staff we have a responsibility to help states and programs learn about new about new information, develop strategies for keeping children safe and to make continuous improvements in the way they work for and care for some of our youngest and most vulnerable children. As we reflect on the important role that regional office staff play I want to take a moment to provide a little background on how we have come to discuss crib safety today. In section 104 B of the Consumer Product Safety Improvement Act of 2008 there was a requirement that the U.S. Consumer Product Safety Commission issue consumer product safety standards for durable infant and toddler products.

Since 2007 the CPSC, the Consumer Products Safety Commission has recalled more than 11 million dangerous cribs, did you all know that, I hope so. Drop side cribs with detaching side rails are associated with at least 32 incidents of infant suffocation and strangulation since 2000. Additional deaths and injuries have occurred due to faulty or defective crib hardware. As new challenges surface, new solutions are created, in light of this the Office of Head Start and the Office of Child Care are working jointly to support you in your work in the regional offices to make sure that our youngest of children are kept safe. We continue to work with states and with programs, tribes and territories to make sure that they adhere to safety standards and regulations.

Today's safety webinar will address the following, we're going to define the new crib regulations, address the possible effects of the regulation on child care, Early Head Start and seasonal and migrant Head Start programs, share important messages for programs and grantees and highlight some state

models of crib replacement programs. It is our hope that this webinar will prepare you for you conversations with both state representatives and programs as they work to provide the safest equipment available for infants and toddlers in the centers and homes where they receive care. I am now pleased to turn the webinar over to Moniquin...Moniquin.

Moniquin Huggins: Thanks Amanda, good afternoon everyone, I'm Moniquin Huggins and I'm with the Director program...with the Office of Child Care, Director of Program Operations and I just wanted to take this opportunity to thank the Early Head Start National Resource Center and our colleagues at the Consumer Product Safety Commission, the Healthy Child Care America Project and others for making the webinar possible. I also want to extend my appreciation to our regional staff for participating in the webinar this afternoon and for being our eyes and ears in what's happening in the field through your contact with the states, territories, tribes and local Head Start programs.

At the Office of Child Care our main priority is to support the health and safety of children in child care settings and we believe crib safety is important to keeping children safe. Amanda provided the background on why this webinar is important and the critical role that our federal staff and the regional offices play, I hope that this is just the beginning of our work together to send a consistent message to our grantees and share our commitment to work together to explore strategies to help programs meet the requirements. We know that small child care businesses and specifically family child care home providers may have limited funding to purchase the new cribs that meet the new regulatory requirements. We also know that some states have been able to address this issue in a number of ways that may be helpful to others to hear and some of those strategies will be highlighted this afternoon during the presentation. It will be important to continue to share initiatives on an ongoing basis. Again thanks to everyone and we look forward to our continued partnership to support safe cribs in all child care and Head Start settings. And at this time I would like to pass it over to Jeanne VanOrsdal with the Healthy Child Care America at the American Academy of Pediatrics who will be our moderator today, Jeanne.

Jeanne VanOrsdal: Thank you Moniquin, my name is Jeanne VanOrsdal and I am the manager of Early Education and Child Care Initiative at the American Academy of Pediatrics. I'm the project director for Healthy Child Care America and Child Care Health Partnership and I also work on the Head Start National Center on Health. Over the next 90 minutes our subject matter experts will help us take a more in depth look at crib safety standards and provide information to address some of the many questions that continue to surface about this topic. If you have joined us before for a webinar you're probably familiar with our format, we would like to offer a brief overview for those first time listeners. We will begin with a discussion followed by a time to hear from you during a live question and answer session. It's easy to join in, simply use the call in option shared at the beginning of our call or use the chat option to type and send your questions. As we begin keep in mind that these crib regulations go into effect December 28, 2012 and programs need to start working right now if they've not already started to ensure that they

meet these new regulations. Our first panelists today are Justin Jirgl and Kelly Moore from the Consumer Product Safety Commission, Kelly?

Kelly Moore: Thanks Jeanne, my name is Kelly Moore, I am the acting team lead for the Children's Safe Sleep Team here at the U.S. Consumer Product Safety Commission and the other panelist from CPSC will be Justin Jirgl who is compliance officer in our division of compliance here at CPSC. We're going to be talking a little bit about exactly what the content of the regulations are, what it means and who it applies to and also how to make sure you are in compliance. The Consumer Product Safety Improvement Act of 2008 mandated that the commission issue consumer product safety standards for a number of different types of products among them were cribs and other durable infant and toddler products. One of the main reasons behind this is that those standards at that point had not been updated in over 30 years.

Obviously there have been advances in technology and we would hope that safety standards would have gotten more rigorous over time and that is I guess how this regulation came into play. This covers cribs and cribs I just want make sure we understand exactly what that means. That would include both cribs currently at market for the first time, also cribs on the secondary market, full size cribs and cribs that are slightly smaller that we call the non-full size, also portable cribs and crib pens. Also includes...it doesn't matter what type of material the crib is made out of it could be metal, it could be wood, there are stackable cribs, all of these things would fall into the definition of cribs for the purposes of the Consumer Product Safety Improvement Act. What it does not include are bassinets, also it does not include play yards and we can talk a little bit more about that in a few minutes about how it differentiate cribs versus play yards but for the most part it's safe to assume that play yards have mesh or fabric sides and kind of a rigid frame. People often talk about play yards in a generic sense of pack and plays, you won't hear us doing that because pack and play is actually a proprietary name and used by Graco but for our purposes play yards basically mean the same thing.

Okay so the requirement of the crib standard, people often ask whether it is possible to look at your crib and be able to tell just by viewing it whether it is compliant with the new standards. I think one of the most important things to note from this webinar is that you can't tell just by looking at the crib whether it is in compliance with the new standard or it's not. There are requirements that need to be met in order to be in compliance with the new standard, fall into three general groups, there's hardware, there's crib slats and mattress support.

Most of the cribs out there on the market are made of wood and so you know the slats would also be wood obviously and just to talk a little bit I guess more specifically about the federal requirements;

obviously people often talk about the ban on drop sides and it's certainly true that drop side cribs cannot be made or sold under the new crib rules and that is certainly true but the regulations really go so much further beyond that. This also applies to drop side cribs that may have had a immobilization kit or repair kit from the manufacturer; some of these were distributed in connection with products recalls, some of them were not, some of them were just given by manufacturers in order to make the drop side immobile so that obviously that's why it's called the immobilizer so that you would not be able to move the drop side up and down. Those types of scenarios are also not permitted; cribs that have that kind of set up would not be considered compliant under the new regulation. Wooden slats also must be made of stronger wood to prevent breakage. In the past we've seen patterns of defect where poor quality wood has been used for crib slats and infants and young children have been able to kick out the slats or to break them and that can introduce a laceration or entrapment hazard in the space its created in any kind of jagged wooden edges that would be there.

Crib hardware must have anti-loosening devices to keep it from coming loose or falling off and that includes the mattress supports. One pattern of defect that we've seen is where the hardware that supports the mattress and connects it to the four crib sides, infants in some situations if you have a faulty mattress support that's not fully connecting that bottom surface to the four sides sometimes an infants body is able to pass through that opening that's created but their head is not and that has made for some entrapment and suffocation hazard there as well because infants face can become entrapped up against the crib mattress. And to that end mattress supports must be made more durable and also just as general matter safety testing has been made more rigorous.

Consumers should also know I guess that manufacturers have to submit samples of their cribs to third party labs that have been accredited by CPSC to conduct those tests in order to make sure that they pass those new heightened standards. Before we go on to who must comply with the crib standards I also want to just make one other note that the new crib regulations do not mean that all cribs...all drop side cribs are recalls. Some manufactures recalled specific cribs in cooperation with CPSC because of specific risks of harm or other defects that were discovered relative to those particular cribs. Again, drop side cribs would not be compliant with the new regulations but it does not mean that all drop side cribs are recalled.

Moving on to who must comply with the new crib standards, the requirements apply to any person that manufacturers, distributes in commerce or contracts to sell cribs, mainly retailers and this next point I think would be the most relevant to the folks who are probably on this call based on the person's occupation as having knowledge or skills particular to cribs including child car facilities and family child care homes. If you are in the business of caring for infants and in that vein providing I guess equipment and other things to be able to care for the infants like cribs then you are held to the standards. Also entities that are in the business or people in the business of contracting to sell or resell, lease, sublet or

otherwise place cribs in commerce if you're really talking about distributors or also entities that own or operate places public accommodation in fact in commerce such as an inn, hotel or motel.

Also companies that rent cribs would also I think go into that first point the bullet on the page on distributors, they also have to be in compliance with this new standard by the December 2012 date that we just talked about. Prohibited acts under the new crib regulations so it is prohibited for any person, any one of those people who fall in the categories we just talked about; it would be prohibited for them to manufacturer, sell, contract to sell or resell, lease, sublet, offer, provide for use or otherwise place in the stream commerce a non-compliant crib. I think where it probably has the most practical application for the folks on this call is that if you have noncompliant cribs that you may clearing out in preparation for compliance with the new rule, you cannot, after this goes into effect, you cannot...you cannot give those away you can't donate them to charity; basically any time that those cribs would change hands you're not permitted to do that and because the compliance effective date was June of last year that would apply now.

So if you are in preparation for the new crib regulations going into effect for child care facilities...trying to clear out your inventory of noncompliant cribs right now you're not able to do that and be in compliance of the law. You may be subject to civil penalties if you do that.

All right, next is compliance states, so when this rule was initially published it was December 28 of 2010, so obviously this has been out in the public domain for a long time and because of at least initially the fact that there was a limited supply of compliant cribs on the market, CPSC set a 6-month effective and then two compliance dates. So June 28, 2011 was the compliance date for most people who are dealing in cribs meaning for example manufacturers, retailers and then December 28, 2012 is the compliance date for places of public accommodation and crib rental companies and also folks who are providing cribs for child care facilities for the care of children in her home or any people who might be in that category.

[Silence]

So again the effect of the new crib rule is that once that new effective comes for...December 28, 2012 for child care facilities it would be a violation to put cribs into other people's hands that would be noncompliant with that rule and I'm just going to be turning it over to Justin here in a second; he's going to be talking a little bit about the upcoming enforcement of the child care portion of this and also how to prove compliance as the child care provider.

[Silence]

Justin Jirgl: Sorry about that, thank you everyone and thank you Kelly. So this is what people need to know especially the providers that are out there, how to determine if the cribs that I have in use currently are compliant with current CPSC standards and this is how one would go about doing that. First is to assess all the models and manufacturers of the cribs that are in use. It's possible that several different models are currently being used and those may differ as far as whether or not they have been certified by the manufacturers as being compliant with current crib regulations but first thing is to assess all the cribs that are in use and determine each one by manufacturer and model.

The second thing that providers should do is to look for the tracking label on the crib; this is a label that is not affixed to any particular portion of the crib; it can be on the mattress support; it can be along the slats, or on the headboard but it is a requirement that any crib that has been certified to current crib standards will have this tracking label present. On the tracking label it will identify the date of manufacture for the product and CPSC will consider any crib manufactured on or after June 28, 2011 as being compliant with current CPSC standards. Additionally, providers can look at the registration card which also accompanies any crib that has been certified as being compliant with the current CPSC standards; this will similarly identify the date of manufacture of the product as well; if it's after June 28, 2011 CPSC will consider that crib to be compliant with current CPSC standards.

Now that's merely to assess for yourself and again for the licensing inspectors that will be coming but the easiest way we've found for providers to display this compliance when they determine that their cribs are certified to current CPSC crib standards is to contact the manufacturer of the product or the retailer who sold the product to you and obtain a certificate of compliance, certificate of conformity or children's product certificate; those terms are synonymous. Those certificates will identify the specific model of crib that's being assessed and will identify the standards being tested to, who did the testing and we found that that's the easiest way for providers to display to inspectors that their cribs are in fact compliant with current CPSC standards.

Many crib manufacturers have put on their website a means by which consumers can readily print these certificates off. Now it should be known that you can't just print out a certificate and somehow magically make a noncompliant crib, even if they are the same model, instantaneously compliant; you as providers need to assess the factors, you know look into the aspects that I discussed previously, the tracking label and the registration cards to determine whether or not these cribs are in fact compliant.

Now as far as other documentation is concerned some and there are relatively few instances but on some occasions manufacturers and retailers have supplied compliant test reports to consumers who have requested certificates or certification documentation and CPSC would find that to be acceptable as well. Please ensure that these test reports indicate compliance to those are the standards that CPSC...the current CPSC standards for full size and non-full size cribs respectively. The previous standards were 16CFR1508 and 1509 and those are obviously not compliant with the current standards

and are only compliant with the previous standards; so we've been sure to make that distinction when determining whether or not the cribs that are currently in use at your facilities are in fact compliant. Now we've had the question posed several times about receipts and I understand...we understand at CPSC that's the easiest way that one could go about displaying compliance; however and receipts can be used as a secondary means of displaying compliance; however it's come to our attention that a few retailers after the June 28, 2011 compliance date that Kelly referenced previously had sold cribs that were not certified to current CPSC crib standards and that's the reason why we cannot accept receipts alone as documentation that the cribs in fact are compliant with current CPSC crib standards.

If there are any participants on this phone call or if you're aware of anyone in the child care community that has purchased a crib after June 28, 2011 which has not been certified to current crib standards please contact the retailer and contact the CPSC and we will follow either the retailer in question, we'll remedy the situation by providing compliant cribs or myself in the office of compliance I will step in to ensure this takes place and take separate actions with the retailers. There very rare situations where this occurred but again it did occur so that's one of the reasons why we cannot accept receipts alone as being a determinant when figuring out if a crib is compliant or not.

[Silence]

What I would suggest doing is if you've not done so already, go to the crib portion of our website, review the FAQs; they discuss many of the items that would be of concern to individuals in the child care community in much greater detail than what Kelly and I will be discussing today; this is merely a broad-brushed over view of crib regulations in general and in order to determine specific answers to questions you can either pose them today or reference the crib website and specifically the FAQs to get updated information and I know that we are constantly reviewing and updating these questions; it's a tedious process as with everything when dealing with the federal government but we do our best to keep the information current and we will potentially be putting something out there quite soon related which will assist the child care community in a greater capacity than we are currently doing in our FAQs.

Additionally, we will discuss you know federal register notices that are associated with the crib regulations and determining well...it also provides an explanation as to which entities are subject and if your...if we the CPSC consider you to be a child care provider. At this time I'd also like to discuss play yards in some capacity as we've been posed; there's many questions have been posed relating to the product area and there is recently...the commission recently adopted a final rule for play yards and that incorporates by reference ASTM F40612A; it will be a mandatory standard similar to cribs and that is a mandatory standard which needs to be met by manufactures, retailers, distributors of the product;

but it's quite different from the crib regulations and that first and foremost it does not effect the child care community. If you're currently using a play yard in your facilities you will not be required to replace it with a play yard that is compliant with the new play yard standard; similarly the standard does not address...the rule does not address resale or resale of noncompliant play yards, obviously you cannot sell a product that has been recalled; however dissimilar to cribs you can sell a play yard which is not certified as being compliant with current CPSC play yard requirements; so it's quite different from the crib standard in that respect. At this time I'd like to turn the presentation back over to Jeanne where she will answer some of the questions that have been posed.

Jeanne: Thank you Justin that was very useful and helpful information. So the next slide...we've shared some information on this slide for you regarding medical cribs; we provided a link for you; there's been a lot of discussion amongst providers about the use of medical cribs and just note that those are regulated by the FDA, not by the CPSC; so there's a link on this slide that will lead you to more information regarding regulation and guidance regarding those medical cribs.

So we're going to move on to some questions that we hear quite often. We've taken some frequently asked questions and we are going to have Justin and Kelly share some information regarding those and then we'll move on to some more information about some model crib replacement programs and Q and A for everyone. So this question was about the date on the certificate versus the date on the receipts; I'm pretty sure Justin that you did that one justice already and went ahead and you've answered that one so I'm going to move on to the next question.

So there's a lot of questions out there regarding the monitoring process. Can you tell us any more about the monitoring process; who will be monitoring; when will it begin; how many areas will be assigned to each monitoring agent or agency; what can you share with us on that?

Justin: Sure, well the enforcement will begin as we've discuss a number of times on December 28 of this year and we've not yet resolved exactly how the enforcement process will work. Certainly our product safety investigators will be heavily involved in conducting inspections of child care providers; however we may work with the state and local licensing agencies; as many out there in the child care community are aware states are incorporating language related to ensuring that cribs that comply with current CPSC crib standards are in use at these facilities and they will be assessing many of the same aspects when routine inspections are conducted at child care providers; therefore individuals from state and local licensing agencies may be doing some of this compliance work on our behalf; I'm not saying that this will definitively take place but that could occur.

What certainly will occur is that down the line CPSC product safety investigators will be visiting child care providers, family child care homes, child care centers to determine if cribs in use are compliant with current CPSC standards and we can't discuss too much regarding our enforcement policies because it would allow individuals the opportunity to circumvent our authority which is why we keep those...how many inspections will take place, what regions will these inspections be conducted in, things of that nature confidential to CPSC.

Kelly: This is Kelly I'm just going to jump in as well for one other quick comment and that is CPSC has a pretty sizable field staff of roughly 90 field investigators that are stationed around the country and who have a few different functions for our agency and as Justin mentioned would likely be heavily involved in this but also they would most likely not be the only folks who are looking out to enforce the crib regulations related to child care providers so you know that might give you a little more color on the agency staff who will be dealing with us.

Jeanne: Thank you so much that's very helpful and then our next question is regarding play yards. Do you recommend that babies sleep in play yards; many child care operations are purchasing play yards instead of the new cribs and I see that we have the new play yards standards listed on this slide as well so those of you participating in the webinar today have access to those.

Justin: Yes, CPSC recommends that infants be placed in cribs that are compliant with current CPSC standards; however, we are knowledgeable about how low the profit margins when it comes to child care and we understand that it's very...it's quite difficult to swap out all existing cribs that are in use and purchase new cribs; that's a very expensive proposition and as you indicated Jeanne, many have resorted to using play yards in lieu of cribs and there's nothing in CPSC regulations that prohibit this behavior from taking place; however, if I were a child care provider I'm aware of a few states out there, and I can't think of them off the top of my head but a few states prevent...or prohibit this type of behavior from taking place and they do not allow play yards to be used in lieu of cribs in a child care environment and I would consult all local and state regulations related to child care before purchasing play yards for this purpose. The other fact that...or the other statement that I'd like to make regarding play yard use is that we feel strongly that no provider should be using a recalled crib...or recalled play yard in any capacity. This should not have taken place previously and certainly should not take place moving forward so you'll need to...what you should do when assessing whether or not to use a play yard that's currently at your facility is to consult our website and determine if the product has been recalled previously before putting it into use for the purpose of allowing children and environment to sleep in.

Jeanne: Okay, thank you very much; so moving on then; the next question that we have is about the pilot crib program; can you share a little bit of information about your pilot crib program?

[Background noise]

Justin: Yes.

[Silence]

Justin: My apologies for the delay; I'm sorry about that; yes, we will be conducting a pilot program this...in the coming months probably late August through September near the end of the fiscal year. CPSC has not previously regulated the child care community and we felt it was prudent to get out there and interact with the individuals that we will be regulating and interact similarly with the state and local licensing agencies to develop contacts and what the pilot program will involve are seven states and 70 inspections and the intent of the program is to assess compliance rates and knowledge of CPSC crib regulations. Now because we are only in August and the compliance date associated with crib use in child care facilities is not until December, this pilot program is merely for information gathering purposes; we won't be showing up on your door step with our fine books trying to assess any fines or civil penalties; this is merely for us at CPSC to develop a program to assess compliance in fiscal year 2013 when these requirements become effective. So if your facility is one of the few that are involved in this program, please don't...there's no need for any concern, especially if the cribs that are currently in use have not yet been removed from use. These can continue to be used until December 28 and again this is merely to determine where we're at nationwide as far as compliance rates are concerned and if the facilities involved, providers that are involved are knowledgeable about the upcoming requirements.

Jeanne: Thank you very much Justin.

Justin: Oh, I'm sorry I apologize and...I'm sorry that concludes the pilot program portion, I apologize.

Jeanne: That's okay. So then moving on, we're going to share a couple of models of state crib replacement programs that have taken place; we're going to share information from Indiana as well as from Michigan; so let's start with Indiana and in anticipation of the need for providers to comply with this new CPSC regulation regarding cribs the Indiana Association of Child Care Resource and Referrals as

part of an Infant/Toddler Quality Enhancement Initiative Project funded by ARRA Funds facilitated a child care crib replacement project. They focused on childcare providers that were already part of the Infant/Toddler Quality Initiative; they worked with Lowe's who was willing to provide compliant cribs and they were willing to destroy the non-compliant cribs. There was a one-to-one correspondence in that in order to get a crib the provider had to give up a crib and in order to be part of the project the provider had to sign a memorandum of understanding and agree to safe sleep professional development requirements, a pre-assessment, a technical assistance visit by an infant/toddler enhancement specialist and a post assessment.

So in looking at Indiana's model they were very thorough in making sure that not only were...they the providers going to be compliant in their cribs but also that they understood safety policies and when the funding ran out local United Ways partnered to fund additional crib replacement. IACRA is going to have a second round of crib replacements based on QRIS levels that will be funded by quality dollars and for more information Lisa Henley is the contact person for this project and her contact information is at the bottom of this slide. She is more than willing to share all of her documents as well as just chat with people who are interested in the program that they have.

So then moving on to Michigan; Michigan was the second state that we are going to look at and they modeled their program after the Indiana project. The project was funded through ARRA dollars and was housed in the publicly owned Early Childhood Investment Corporation. Michigan chose to focus on replacing cribs in programs that serve the most vulnerable children; they utilized the Great Start to Quality Resource Centers which are part of the resource and referral system in Michigan. They used those centers as distribution hubs and also as a means for contacting the providers themselves. This allowed an opportunity to build relationships between the resource centers and the programs themselves. A second round was implemented that used Lowe's and Kaplan as the point of distribution to the child care programs and again there was a focus on destroying old cribs as well as on requirements for professional development. There were exchange events held across Michigan in 35 locations, replacing a total of 5,797 cribs for 1,100 providers.

Now we aren't going to highlight any other states during this particular presentation but I do know that in doing the research for this portion I did find that there were states that are using quality dollars, others that we're looking at enhancement with private foundations and looking to see where they might be able to reach out to local United Ways or Goodwills who might be willing to also work with these programs; so I think its been very interesting as we look at this to see how people have been innovative in trying to assist providers in replacing their cribs.

So now we're going to move into the question and answers section of our webinar and I'm going to have Sarah, our operator take over; she will be going over the protocols for asking questions, Sarah?

Sarah: Thank you, to the audience if you have a question or a comment via the phone lines today please press star then 1 on your touch tone phone. For those of you joining us today using a speaker phone please make sure your mute button is turned off to allow your signal to reach our equipment. A voice prompt on the phone will indicate to you when your line has been opened; we do ask that you please state your name prior to posing your question; once again it is star then 1 to the audience.

Moderator: Okay thank you Kelly; we do have some more questions here, this one is for either Moniquin or Amanda: Replacing all of our cribs is going to be a financial burden; will there be anything to help providers with these costs such as stipends or grants?

Moniquin: This is...take myself off of speaker; this is Moniquin with the Office of Child Care and we don't have additional funds that are targeted to help states; states do have...states, territories and tribes do have the flexibility to use their quality dollars and I think Jane, two of her or at least one of her examples of state initiatives did include quality dollars. Now we know that states are using quality dollars for many different quality initiatives though their effort to help every provider may be limited but they do have that flexibility.

Amanda: And this is Amanda, we have very [inaudible] we do not have a specific appropriation or additional dollars to do...you know replace the cribs. We have been communicating about this expected requirement for well over a year; we hope that many grantees have made it part of kind of their operating costs over the last 18 months or so and have been able to successfully replace cribs. We also are encouraging our programs to really to state and local partners similar to the Indiana model, maybe working with associations, other organizations to identify potential partners who could provide support as programs work to comply with this really essential regulation.

Moderator: Okay, thank you; we have one more question for Moniquin and Amanda: How do these regulations effect our child care, EHS, Head Start, seasonal and migrant Head Start programs?

Amanda: Well, this is Amanda; hopefully everyone has been paying really ardent attention to the presentation; I should turn the question back to audience but I don't know how so I will say that yes this is absolutely applicable to all of our programs and I think

Moniquin will say the same thing and programs must ensure that the cribs that they're using meets the new CPSC requirements no later than December 28.

Moderator: Okay, thank you. We have another question here; will this webinar be shared on the ECLKC and what about the OCC websites Healthy Child Care America websites?

Moniquin: Yes, we will...this is Moniquin with the Office of Child Care; we will have that link to wherever the webinar is located on our website and Jeanne if you're putting it on the Healthy Child Care America website we will link to that.

Jeanne: This is Jeanne and it will be housed on the Healthy Child Care America website until we can get it up on the ECLKC site.

Amanda: This is Amanda; we will get it up on the ECLKC as soon as we are able to do so; everyone on the phone recognizes that we are in a holding pattern right now; but it will be available through Healthy Child Care America and then eventually it will go up on ECLKC.

Moderator: Okay, great thank you; operator have we got any questions via the phone line?

Operator: We do not at thistime but again to the phone audience it is star then 1 if you have a question.

Moderator; Okay we do have some questions for Kelly for Justin; when will the standards for play yards be reviewed?

Justin: As we discussed during our presentation they have been reviewed and the rule making process has resulted in CPSC or the commission voting to adopt the final rule for play yards. The federal registered notice has yet to go out but I anticipate that should be published in the coming days and that will identify the specific section of the total federal regulations where the play yard regulation is discussed.

Moderator: Okay, great; we have a couple more questions for your group...I'm sorry Justin were you done?

Justin: Oh, yes.

Moderator: Okay I have a couple more questions for your group there; is there any recourse with a crib manufacturer that will not respond with information; would the CPSC have a list of approved models?

Justin: As Kelly indicated in her portion of the webinar manufacturers are not compelled to provide these or certification documentation directly to consumers; however at the present I'm not aware of any manufacturer, distributor who is not supplying these certificates upon request. We at the CPSC...if there is an instance where a manufacturer is unwilling to provide this sort of documentation manufacturers are required to provide it to us and we would direct the consumers to contact CPSC, notify us that this is taking place and we can obtain that documentation on their behalf and share it with the consumers that are affected.

Now regarding the list of approved models that is...we do not have or maintain any sort of list regarding approved models; that is something that would be quite difficult and arduous to do as the market place is constantly in flux with manufacturers changing the model they choose to sell and new models coming on board and as such we are...we're not going to develop a list of compliant cribs as it would be constantly changing on a day-to-day basis.

Moderator: Thank you; we have one more question for you: how and who will be enforcing the crib standards in child care homes and centers across the nation?

Justin: Yes, as we discussed previously it will certainly be the role of our product safety investigators who as Kelly said are stationed nationwide to go out and inspect child care providers to determine if cribs that are currently in use are compliant with current CPSC regulations and we may be partnering with state and local licensing agencies to do some of this work on our behalf and we have not, as I said, we have not yet resolved whether that partnership will take place and in what capacity it will or will not exist in but it may involve those other entities as well; but certainly our product safety investigators will be heavily involved in enforcing this regulation.

Moderator: Great thank you; operator have we got any questions coming in via the phone line?

Operator: It appears we have no questions via the phone lines at this time.

Moderator: Okay thank you; we have one more question; can cribs be recycled or given away?

Kelly: Hi, this is Kelly; no cribs cannot be given away; as to the recycling question you know as to how people dispose of cribs after they are disassembled as long as they're going to be destroyed in some fashion whether that's being recycled or otherwise disposed of; that's really fine; we don't have any problem with that; it's where cribs can make their way back into the stream of commerce again and that would include donations to charity and other types of...you know any time you give a crib away that when you expect someone to use it; that's certainly not permitted under the new regulations.

Moderator: Thank you Kelly; that will...that is all the questions that we have; if you do have a question you can still put them down in the private chat; we'll try to get to those, at this time I would like to turn it back over to Jeanne. Jeanne?

Jeanne: Thank you Kelly...so we have a slide that provides a great deal of resources for you; we hope that you will find those beneficial as you look into the crib regulations and if you have any questions you might find that these sites can answer those questions or if not they'll be some contact information available; you have the contact information for early Head Start technical assistance center, and you can also contact Healthy Child Care America.

Then the last slide is just a thank you; we want to thank you for participating today and if there are not any other questions at this time; Kelly are we good?

Moderator: I do not have any questions via the chats; operator do you have any questions? Operator: We have none via the phone lines.

Jeanne: Okay Amanda or Moniquin do you have any closing comments that you would like to share?

Amanda: This is Amanda I just would really want to thank everyone for their participation this afternoon and say that this is a really you know important subject, the most fundamental thing we do for children is to ensure their safety and well-being and it's only from that and their other development really progress; so it really is the most important thing we do; if you have questions, you encounter challenges, tough situations we encourage you to be in touch with us and you know we just look forward to our continuing conversation and work together as the country continues to do a better job keeping children safe.

Moniquin: Hi, this is Moniquin with the Office of Head Start and I just want to echo everything that Amanda said. That we are here to you know answer any questions that you might have and let us know what you're hearing from the field and how we can help the program meet the requirements.

Jeanne: Thank you both and thank all for participating today; we are pleased that you were able to join us and learn more about the crib regulations and thank you to Kelly and Justin for their information which is valuable and we thank Mr. Sinclair for hosting today and if there is nothing else we're going to finish early.

Operator: And that concludes today's conference; we thank you all for joining us.