

>>> On 5/9/2011 at 2:48 PM, in message
<810CE84EA346CA4391BAD728C64F2C4D12F91D17@kki-gsp-mail1.kki.org>, "Levey, Eric"
<levey@kennedykrieger.org> wrote:

I am responding to the request for comment on Use of Bumper Pads in Infant Cribs by the Department of Health and Mental Hygiene on behalf of the Maryland Chapter, American Academy of Pediatrics (MDAAP).

- a) We do not know of any data that indicates the extent to which bumper pads are being used in infant cribs or that measures the risk of harm to infants who sleep in cribs with bumper pads. It is our impression that bumper pads are not being widely used by families in Maryland or the United States. Pediatricians do not typically recommend bumper pads for infant cribs and most pediatricians would recommend against their use, except under special circumstances.

The American Academy of Pediatrics (AAP) does not have a policy statement that specifically addresses the use of bumper pads in cribs. The AAP has a statement on SIDS that addresses safe infant bedding in general--The Changing Concept of Sudden Infant Death Syndrome (SIDS)
<http://aappolicy.aappublications.org/cgi/content/full/pediatrics;116/5/1245>. It does not specifically address the use of bumper pads. On a practical basis, we would recommend avoiding use of crib bumper pads for infants less than 6 months of age, as this is the age group at highest risk for SIDS. The decision to use bumper pads for older infants and toddlers should be made on a case-by-case basis weighing risk of injury from physical activity or falls in the crib versus risk of entrapment or falls due to bumper pads.

- b) For very active old infants and toddlers, bumper pads may provide some protection against physical injury. On the inpatient unit at Kennedy Krieger Institute, we use bumper pads for toddlers who are very active, have self-injurious behavior (e.g. head banging), or have epilepsy in order to prevent physical injury.
- c) It is difficult to conjecture as to what effects labeling would have on the risk of bumper pad use. It is not clear who is using bumper pads and for what purpose. In situations where an infant has been injured or died, it is not clear if the bumper pads were used properly or not.
- d) MDAAP is neutral as to whether or not DHMH provides input to the Consumer Product Safety Commission. DHMH should certainly report to CPSC any data that it has regarding use of bumper pads and risks to infants, including the one infant death that was mentioned in the Maryland Register.
- e) It would be appropriate for DHMH to issue a warning regarding use of bumper pads in cribs for infants less than 6 months of age in the context of more global recommendations regarding safe sleep. A public awareness campaign regarding safe sleep for infants would be helpful in reducing the rate of SIDS in Maryland and could include recommendations regarding use of bumper pads in cribs.

- f) It does not seem that there is sufficient information yet available to consider bumper pads a hazardous material.

Thank you for the opportunity to provide input.

Sincerely,
Eric Levey, MD, FAAP
President
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