



December 18, 2012

Acting Director Jeffrey Zients
The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Mr. Zients:

On behalf of Safe Kids Worldwide, I write to express our support for the vital role of the federal government in keeping kids safe. Respectfully, we believe that this should be reflected in the President's budget submission. Safe Kids Worldwide appreciates the sea of change that the Obama administration has brought to child injury prevention. Kids are among America's most vulnerable citizens and the Administration's aggressive role is effective and essential. It is important to note that I am sending this letter before the mandate of the Budget Control Act has been met. Attached is a report we issued on the impact of sequestration on child safety, "The Math of Sequestration: Kids Safety on the Cliff."

Unintentional injury is the number one cause of death to children 19 and under in the United States. This is a statistic that surprises many, but it is a fact. Twenty-four years ago, Safe Kids Worldwide was founded, with the support of our founding sponsors Johnson & Johnson, General Motors and FedEx, to confront the challenge of reversing this tragic statistic. Today, it is a global network of organizations dedicated to providing parents and caregivers with practical and proven resources to protect kids from injury. Safe Kids works with an extensive network of more than 600 coalitions in the U.S. to reduce traffic injuries, drownings, falls, burns, poisonings and more. Since 1988, Safe Kids has helped reduce the U.S. childhood death rate from unintentional injury by 53 percent. But preventable injury remains the number one reason why kids are dying in America.

This letter focuses on three agencies which have a direct impact on child safety: the Consumer Product Safety Commission (CPSC), the National Highway Traffic Safety Administration (NHTSA), and the National Center for Injury Prevention and Control (NCIPC) of the Centers for Disease Control and Prevention (CDC). Cutting funding to these agencies directly impacts the safety of children. These agencies are representative of the indispensable federal role in child safety. There are other important programs that are directly linked to the child safety mission, and we share thoughts about them later in this letter.

Centers for Disease Control and Prevention (CDC) National Center for Injury Prevention and Control (NCIPC)

The Injury Center is the only federal entity that focuses on injury and violence prevention in the home, recreational and other non-work settings, and thus is vital in the cause of reducing child injuries.

However, recently it endured significant funding cuts. Between 2010 and 2011, Congress slashed the CDC's funding by 11% and the Injury Center has been cut in ways that mirror these cuts. As a result the Injury Center had to reduce and eliminate a number of important functions and is still reeling from the effects. Therefore, we recommend that the Injury Center's funding should be restored to its original level before the cut and receive **\$150M**.

The Agency's Role in Child Safety

In 2012, the Injury Center rolled out the National Action Plan for Child Injury Prevention (NAP). The NAP raises awareness about the problem of child injury and the effects on our nation, offers solutions by uniting organizations behind a common set of goals and strategies and mobilizes action to reduce child injury and death. It serves as a guide for the government, the private sector and NGOs. For Safe Kids, it acts as a road map on how we can work to prevent childhood injury.

One example of an emerging trend is the risk of kids injuring themselves while playing sports. There has been growing concern over the rising number of Traumatic Brain Injuries (TBIs) in kids. A Safe Kids research report, "Coaching Our Kids to Fewer Injuries," revealed that youth coaches lack the continuing education to deal with concussions, both how to prevent them and how to avoid making them worse. Today, the gold standard for coach education on TBIs is "Heads Up," an online program provided by the CDC. The "Heads Up" program has grown deeper in content as concern over TBIs grows. However, without the proper funding, the CDC may need to reduce its scope or even end it. To use a football metaphor, we cannot sack this program or the Injury Center. The Injury Center is at the epicenter of addressing the problem of kids in sports, a problem which has so many parents on edge about whether to allow their child to play a contact sport.

Set Funding at \$150M

Without the proper funding, the Injury Center is unable to fulfill the essential role it plays in child injury prevention. The Injury Center's funding should be restored to the 2010 level with **\$150M**, and more if that is legally possible.

U.S. Consumer Product Safety Commission

The U.S. Consumer Product Safety Commission (CPSC) plays a critical role in child safety. Under the Consumer Product Safety Improvement Act of 2008 (CPSIA), it is clear that the agency is mandated to stress the protection of children from unreasonable risks of injury or death from more than 15,000 consumer products in the market place. Additionally, the CPSC plays an important role in detecting emerging risks that develop because of changes in culture, technology, the environment, and other developments. The passage of the CPSIA mandated the CPSC to become more proactive and thus the CPSC was authorized to receive **\$136.4 million**. In FY 2013 the CPSC must be funded at that authorized level.

The Agency's Role in Child Safety

A key example of the role the CPSC plays in protecting all of us, especially children, is in border enforcement. Dangerous products were coming in from China and other nations at a rapid pace. The CPSC teamed up with the U.S. Customs and Border Protection (CBP) Officers to step up its enforcement at our ports to stop dangerous products from entering the U.S. marketplace, a significant portion of which involved children's products. This proactive effort means that more products will never reach marketplace shelves, or a child's hands and mouth. In 2012, the CBP and CPSC announced it had seized

two million units of products. It has been estimated that 84% of the products are for kids or products that kids will be exposed to. Topping the list were children's products with toxic levels of lead, such as more than 13,000 units of multicolored balls and 5,700 units of a toy cell phone, both from China. The second most seized item was children's sleepwear that did not meet U.S. standards. Without adequate resources, maintaining this level of vigilance at our ports will be nearly impossible.

Set funds at \$136.4M

In order for the CPSC to have the proper power, resources and data collection capabilities, funding should be what was set by the Consumer Product Safety Improvement Act of 2008: **\$136.4M**. Otherwise, how can we expect the CPSC to keep unsafe children's products away from the hands of kids, detect new risks, or fulfill its recall role in a timely and effective manner?

National Highway Traffic Safety Administration (NHTSA)

NHTSA is invaluable in the fight to prevent childhood injury and has contributed to the 41 percent decline in motor vehicle traffic-related death rates in children ages 19 and under. There have been significant advancements in auto safety standards, but car crashes remain the number one cause of injury-related death among children ages 1 to 19 in the United States. This year, Safe Kids believes NHTSA should receive the amount authorized in MAP-21, **\$670M**.

The Agency's Role in Child Safety

The progress we have made as a nation in keeping kids safe as passengers in cars is directly attributable to NHTSA's efforts. NHTSA's child safety related activities range from providing grants to states to address distracted driving issues to confronting drunk driving. It is involved in all aspects about the safe use of child safety seats. Additionally, NHTSA implements a graduated driver license (GDL) incentive grant program to promote stronger GDL laws in states. GDL laws insure that teens gradually build up driving experience under lower-risk conditions and have reduced teen crashes by 10 to 30 percent on average. Furthermore, NHTSA examines child safety equipment for safety, ensures that technicians who inspect seats installed in cars have done so correctly, and implements recalls of defective seats. Safe Kids works closely with NHTSA on the child seat program. For example, recently Safe Kids reported to parents about NHTSA's recall involving more than 55,000 seats, voluntarily agreed to by the manufacturer Britax. If NHTSA does not have the resources to recall seats, the consequences in terms of lives lost, injuries sustained and tax dollars wasted is impossible to estimate.

In recent years, Safe Kids has been concerned about the tragic loss of life when small children are left in cars alone, especially during summer months. A car can heat up to 99 degrees when the outside temperature is 80 degrees in 10 minutes. In 2012, 29 children died of hyperthermia because they were left in cars. It is a nightmarish way to die and, for a parent, an even more horrific way to survive. NHTSA has conducted a study to look at ways to remind parents that their child is in the car through technology or other means. They found that at this point in time there are no effective technological reminders. Therefore, the relentless efforts of NHTSA in educating parents about the problem has been essential—Safe Kids has been a partner in this effort, too.

Set Funding at \$670M

To cut funding from NHTSA would endanger the safety of kids in cars, still the most dangerous place for kids. Therefore, we believe NHTSA deserves full federal support and should receive its authorized amount of **\$670M**.

Other Important Programs:

Poison Control Centers:

Poison Control Centers are highly effective at preventing child injury. Despite the small investment and high-efficiency, federal support for poison control centers has suffered cut-after-cut, and cutbacks have been similar at the state level. The federal share is at an all-time low with only \$18.86M provided in FY 2012. On top of that, the Health Resources and Services Administration (HRSA) retains an 8 percent administration fee, meaning that PCC funding is even lower.

This not only puts kids at risk but it is a stark example of how federal budgeting is performed in an illogical way. Let's take what happens when a parent suspects that a child has swallowed a toxic substance or medication, and they call a poison control center. They are saving the nation tax dollars because close to 90 percent of poison control center calls involving children aged 5 and under are resolved over the phone. If instead the parent rushes the child to an emergency room she wastes valuable time because a call to a PCC can resolve a poisoning much more rapidly. Moreover, an ER visit is far more expensive, and often subsidized by taxpayers. Poison control centers save Americans more than \$1.8 billion every year. Therefore, Federal support for PCCs should return to the \$29M that PCCs were authorized to receive by law. Because the amount is a relatively small figure, we urge HRSA to waive or reduce the 8 percent administration fee.

National Fire Programs Division (NFA):

Fires and burns are the fifth leading cause of unintentional injury-related death among children ages 19 and under in the U.S. However, the National Fire Programs Division of the United States Fire Administration (USFA) has undergone a number of cuts over the last few years. Currently, the budget is so small that there are no funds for research initiatives and significant reductions in public education and awareness efforts. The public education and awareness function was cut by \$460,000 between FY 2012 and FY 2013, eliminating important child fire safety programs and disproportionately impacting the development of prevention strategies for at-risk populations. Safe Kids believes that the \$460,000 should be restored in order to maintain the current levels of prevention and education support at the state and local levels, particularly with at-risk populations. Additionally, the research funds should be returned in order to re-establish the active role of the USFA in that area.

CDC Childhood Lead Poisoning Prevention Program:

The CDC Childhood Lead Poisoning Prevention Program funds state and local programs to identify lead paint poisoning through screenings, supports research and conducts educational awareness. We strongly disagree with past efforts to close this office and eliminate its funding. This decision about the fate of this agency comes at a time when experts raised the threshold of the amount of lead which puts kids at risk. This means that 200,000 more kids are at risk of lead paint poisoning. Safe Kids believes that the \$29M should be restored to the CDC Childhood Lead Poisoning Prevention Program.

National Transportation Safety Board (NTSB):

The National Transportation Safety Board is involved in promoting safety practices in all modes of transportation in the United States, whether in the air, on water, on tracks or on highways. Among the issues with which it is engaged are distraction in transportation and drunk driving, especially involving young drivers. It should receive its full authorized amount.

HHS-Children's Hospitals Graduate Medical Education (CHGME):

CHGME supports the education of more than 5,600 resident pediatricians yearly, and has built the diversity of pediatric sub-specialists. One sixth of the nation's 600 Safe Kids coalitions are connected with Children's hospitals and trauma centers. We know the importance of maintaining and growing the pool of pediatricians in our nation, and all its sub-specialties. Children's hospitals must receive the support of the federal government. It should receive its authorized amount of funding, **\$330M**.

Conclusion

It is a national tragedy that unintentional, preventable injury is the leading cause of death for kids aged 19 and under. However the key word is "preventable," meaning that government at all levels can make an impact. Moreover, the interventions we speak of save tax dollars, whether it is the impact of a parent calling a poison control center or a parent correctly installing a NHTSA approved car seat.

There are many involved in protecting and promoting child safety: attentive parents and caregivers, doctors and nurses, coaches and teachers, first responders and many others. It is essential that the effective role of government remain fully committed, and with appropriate funding. We must fulfill the mission and values President Obama has signaled and the promise of the National Action Plan.

We hope that as you look toward creating a reasonable budget, you will not only keep in mind the effect these programs have on childhood injury, but also the significant cuts these programs have already faced. For further information, please feel free to contact me at 202.662.0600, or our Director of Public Policy Anthony Green, 202.662.0606, agreen@safekids.org. Thank you for your consideration.

Sincerely,



Kate Carr
President and CEO