

Administrative Rules Committee
Wednesday, December 12, 2012 – 2:20 p.m.
North Dakota Department of Health

Good afternoon Chairman Koppelman and members of the Administrative Rules Committee. My name is Kim Mertz, and I am the Director of the Division of Family Health for the North Dakota Department of Health. I am here to provide information related to safe sleep practices.

The proposed amendment to the North Dakota Department of Human Services, Administrative Code, Section 75-03-07.1-08, 75-03-08-24, 75-03-09-24, and 75-03-10-24 requires a provider to obtain written parental permission for infants to sleep with a blanket, pacifier or security item.

The North Dakota Department of Health's Sudden Infant Death Syndrome (SIDS) Program provides information to parents, caregivers, health-care providers and other entities on the practices of safe sleep for babies based on recommendations from the American Academy of Pediatrics (AAP). Safe sleep recommendations released from the AAP in November 2011 state that a baby should be placed on his or her back to sleep in a crib without other objects such as blankets, loose sheets and pillow-like toys to reduce the risk of SIDS, suffocation, entrapment and strangulation. Hence, the proposed rule change is not as rigorous or in alignment with the AAP recommendations.

The AAP also recommends considering offering a pacifier at nap time and bedtime, as studies have found pacifiers to have a protective effect on the incidence of SIDS. The proposed rules are more rigorous in this case, as the AAP recommends the use of pacifiers while the proposed rules require written parental permission for use of a pacifier in the crib.

Providing consistent messages to parents and caregivers is critical to reduce the incidence of SIDS and other sleep-related infant deaths. Attached is the updated *Safe Sleep for Your Baby* brochure that clearly illustrates and describes a safe sleep environment for babies free of pillows, blankets or toys and recommends using a pacifier at naps and bedtime. The North Dakota Department of Health's SIDS Program and health-care providers statewide will be utilizing these educational materials to inform parents of safe sleep practices. It is our worry that these proposed rule changes will send a mixed message to parents regarding safe sleep practices for their babies.

This concludes my presentation. I am happy to answer any questions you may have.