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**Sent:** Tuesday, May 05, 2009 5:49 PM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)  
**Subject:** 145 - ChildAPI Comments

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**Comments**

**To:** NIOSH Docket 145 – Child Ag Injury Prevention Initiative  
**From:** Barbara Lee, RN, PhD, National Children's Center for Rural and Agricultural Health and Safety, Director

**Date:** May 5, 2009  
**Subject:** Comments to NIOSH

Thank you for the opportunity to comment on the report, NIOSH Childhood Agricultural Injury Prevention Initiative: Progress and Proposed Future Activities for which NIOSH has requested public feedback (Federal

Register: March 16, 2009, Vol. 74, No. 49). Given that the Childhood Agricultural Injury Prevention Initiative was adopted less than 13 years ago (October 1996), it is impressive that NIOSH has solicited public comment in 1999 and again this year. Clearly, NIOSH leaders and, specifically the team assigned to this topic, are committed to guiding this initiative forward in a productive and scientifically-sound manner.

I doubt that any other federally-funded program has been so closely scrutinized by its public and private stakeholders!

My first involvement in childhood agricultural injuries began more than two decades ago at a time when there were few programs and minimal research focused on children who live, visit and/or work on farms. We've come a long way since then and NIOSH leadership has played a critical part. With funding from NIOSH, our National Children's Center for Rural and Agricultural Health and Safety has facilitated numerous initiatives, funded in large part by NIOSH. Without this financial support we could not have developed the North American Guidelines for Children's Agricultural Tasks (NAGCAT). As noted in your report, research has deemed NAGCAT to be effective. These guidelines have been modified for use in at least six countries, including Mexico and the Philippines. More recently, the USDA has offered external grants for interventions that increase the use of NAGCAT among underserved populations.

Another component of our Center is funding to facilitate the Childhood Agricultural Safety Network. This Network of 14 national-level organizations has nurtured friendships and trust among non-government organizations (NGOs) and others to collaborate on such endeavors as the "Bury a Tradition" and "Keep Kids Away from Tractors" national public awareness campaign. Further, the Network participants have been instrumental in promoting programs and resources developed via intramural and extramural NIOSH funding. An external evaluation revealed that the Network has helped its members increase capacity to address childhood agricultural injury prevention within their respective organizations.

Collectively, participants exert influence at multiple levels across all regions of the U.S. and Canada.

Federal agencies' attention to children on farms has resulted in a complementary track of activity in the private sector, including the major NGOs involved with the Network. Private sector sponsors and foundations have been funding Farm Safety 4 Just Kids and Progressive Agriculture Foundation with up to \$2 million annually to provide outreach education to the farming community. NIOSH-funded research has helped identify the strengths and weaknesses of outreach programs. Research findings have led to modifications of NGO outreach programs that are appealing to private donors (e.g. agribusiness) in terms of marketing and goodwill.

A guiding component of this initiative has been the intramural program on Childhood Agricultural Injury Surveillance (CAIS) and related data collection and analyses. Trends have revealed a remarkable decline in nonfatal injuries from 1998 to 2006. Over these eight years, the rate of childhood agricultural injuries per 1,000 farms (includes youth who live on, visit, and are hired to work) declined by 37% (from 16.6 to 10.5).

The rate of injuries per 1,000 household youth (those living on farms) declined by 44% (from 18.8 to 10.5).<sup>1</sup> NIOSH has generated reports and publications with detailed analyses of data, including minority-operated farms, which have revealed specific trends by gender, age, race/ethnicity, commodity and region. Data at this level of specificity has been used to target new interventions toward priority areas (e.g. non-working children, ATVs). Although fatalities have not shown a similar decline, there is overall evidence to suggest that the national emphasis on preventing injuries to children on farms is having a positive impact. Something is working properly here – we just can't be certain how to account for the measurable decline in injuries.

Accomplishments that can be credited to NIOSH leadership and support related to children and agriculture are too numerous to cite. It is important to note that, as a vulnerable population, children on farms are an outlier in terms of NIOSH's other programs. We acknowledge that NIOSH took a risk when it agreed to take a leadership position on this topic; and now children are reaping the benefits in terms of safer and healthier conditions on farms. By all accounts, including the perspective of the National Academies, this NIOSH Childhood Agricultural Injury Prevention Initiative has been, and continues to be, a good investment.<sup>2</sup> This national initiative serves as a model for public-private partnerships.

Rather than offer specific suggestions for moving forward, my preference is to await findings from the "Blueprint for Knowledge Translation" project (directed by Susan Gallagher of Tufts University as a subcontract project of our Center), which will serve as a roadmap for the future.

Findings and recommendations from the Blueprint project will be forthcoming in 2010 or 2011.

On behalf of my colleagues across the country and the children whose lives are affected, I extend deep and sincere gratitude to NIOSH for maintaining a leadership role pertinent to children's safety and health in agriculture. You've done a great job all along the way and we hope to continue making progress toward eventually elimination of childhood agricultural injuries and deaths.

#### References

1. NIOSH. Internal analysis of the CAIS database. Myers, J. Morgantown, WV: NIOSH, 2007.
2. National Research Council and Institute of Medicine (2008). Agriculture, Forestry, and Fishing Research at NIOSH. Committee to Review the NIOSH Agriculture, Forestry, and Fishing Research Program. Rpt. No. 3, Review of Research Programs of the National Institute for Occupational Safety and Health. Washington, D.C.: The National Academies Press.