

Miller, Diane M. (CDC/NIOSH/EID)

From: Erica Streit-Kaplan [EStreit-Kaplan@edc.org]
Sent: Thursday, May 14, 2009 2:46 PM
To: NIOSH Docket Office (CDC)
Subject: 145 - Draft Childhood Agricultural Injury Prevention Initiative: Progress and Proposed Future Activities
Attachments: CSN comments for NIOSH 145.doc

Good afternoon,

Please see attached letter re: NIOSH 145 from the Children's Safety Network.

Erica Streit-Kaplan, MPH, MSW

Technical Assistance Specialist, Children's Safety Network
Education Development Center
55 Chapel Street
Newton, MA 02458-1060
P: 617-618-2178
F: 617-969-9186
E: estreit-kaplan@edc.org



Children's Safety Network

National Injury and Violence Prevention Resource Center

Main Site

Education Development Center, Inc.
55 Chapel Street
Newton, MA 02458-1060
Phone: (617) 969-7100
Fax: (617) 969-9186

Washington, D.C. Site

Education Development Center, Inc.
1000 Potomac Street, NW
Suite 350
Washington, DC 20007-3533
Phone: (202) 572-3700
Fax: (202) 572-3795

Economics and Data Analysis Site

Pacific Institute for Research
and Evaluation
11720 Beltsville Dr., Suite 900
Calverton, MD 20705-3111
Phone: (301) 755-2728
Fax: (301) 755-2799

May 14, 2009

To NIOSH:

The Children's Safety Network (CSN) National Resource Center for Injury and Violence Prevention is pleased to provide the following comments in response to the *NIOSH Childhood Agricultural Injury Prevention Initiative: Progress and Proposed Future Activities* (NIOSH-145).

CSN is dedicated to working with states to create environments where all children and youth are safe and healthy. Recently we have initiated a project to prevent the high rate of injuries and deaths to children and youth in rural areas. Based on our reading of the current literature and our experience, we offer the following comments:

- One of the barriers we have identified is the access to comprehensive data on injuries and deaths in rural areas. We encourage NIOSH to prioritize funding for surveillance of injuries in rural areas.
- The National Children's Center for Agricultural Health and Safety is a critical resource for information and products. We encourage continued funding for the Center and its projects.
- We promote changing regulations so that children working on family farms are not exempt from the child labor laws.
- We recognize the importance of the work done by 4-H in addressing risk factors for children and youth on farms. We recommend that funding for this group and similar groups be continued and, if possible, increased.
- We recommend that NIOSH, either directly or through its grantees, work to improve the recording of Place of Occurrence E Codes for injury in order to better capture farm-related injury, especially in relation to state Hospital Discharge and Emergency Department Databases.
- We have also found standards vary in the definition of urban and rural communities and roadways. As rural and agricultural communities often go hand in hand, we recommend the creation of a standard definition suitable for research and surveillance or the creation of a typology of definitions that would guide the efforts of researchers, practitioners, and policy makers.

Sincerely,

Sally Fogerty, Director