



January 4, 2018

Attn: Carin Rosa, Licensing Administrator
Child Care Licensing and Administration
Division of Early Care and Learning, CDHS
1575 Sherman Street, 1st Floor
Denver, CO 80203
Delivered electronically: carin.rosa@state.co.us

RE: Support for changes to rules regulating children’s resident camps; changes to rules regulating school-aged child care centers

Dear Members of the Colorado State Board of Human Services:

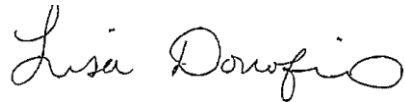
On behalf of the undersigned organizations, we are writing to offer our strong support of changes to rules regulating children’s resident camps and changes to rules regulating school-aged child care centers. Specifically, we applaud sections **7.712.52D1** and **7.712.52D5**, as they remove barriers preventing children in Colorado from using sunscreen at day camps and school-age child care centers. Statewide policies should allow and encourage students to possess and utilize sunscreen for personal use.

Broad “medication bans” that are in place across the country require children to have a note or prescription from a physician in order to utilize sunscreen at school or day camp. Sunscreen is regulated as an over-the-counter drug under the Federal Food, Drug and Cosmetic Act, making it subject to these bans. Although these policies are meant to protect children, they also hinder them from accessing sunscreen during outdoor activities and puts them at risk of damaging sun exposure. According to a 2016 study from the Centers for Disease Control and Prevention (CDC), half of school districts across the country neither require nor recommend policy which allows students to apply sunscreen while at school.ⁱ The CDC believes that these types of policies create barriers to the use of important sun protection.ⁱⁱ

Additionally, it has been found the use of sunscreen at a young age is a critical and necessary component of skin cancer prevention. The CDC reports that only 11 percent of students reported regular or nearly regular use of sunscreen during prolonged periods of regular sun exposure.ⁱⁱⁱ Furthermore, the American Medical Association has adopted policy to support the exemption of sunscreen from any over-the-counter medication bans in school settings and encourages schools to allow students to possess sunscreen without restriction.

It is in the public's interest that Colorado set policies which allow students to possess and apply sunscreen at day camps and school-aged child care centers. Due to the aforementioned reasons, we ask that the Colorado State Board of Human Services approve these sun protection measures. We appreciate the opportunity to comment and if you have any questions, please contact Emily Ninnemann, ASDSA Manager of Advocacy and Practice Affairs, at 847-956-9121 or at eninnemann@asds.net.

Sincerely,



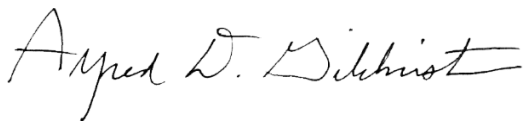
Lisa M. Donofrio, MD, President
American Society for Dermatologic Surgery Association



Jeffrey E. Janis, MD, President
American Society of Plastic Surgeons



Jamie Surovik, MD, President
Colorado Dermatologic Society



Alfred Gilchrist, Chief Executive Officer
Colorado Medical Society

ⁱ School Health Policies and Practices Study (SHPPS) 2016 ... (n.d.). Retrieved December 12, 2017, from https://www.cdc.gov/healthyyouth/data/shpps/pdf/shpps-results_2016.pdf.

ⁱⁱ Skin Cancer Prevention Progress Report 2017. Atlanta, GA: Centers for Disease Control and Prevention, US Dept. of Health and Human Service

ⁱⁱⁱ Eaton, D.; et.al; Youth Risk Behavior Surveillance - United States, 2011. Surveillance Summaries 8 June 2012. 61(SS04); 1-162. Retrieved from <http://www.cdc.gov/mmwr/preview/mmwrhtml/ss6104a1.htm>
