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A Guide to Implementing Child Passenger Safety Inspection Stations

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This guide provides recommendations for implementing child passenger safety inspection stations. Inspection stations are an effective way to increase the proper use of car seats, booster seats and seat belts. This guide is					
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1. Introduction

Child passenger safety (CPS) inspection stations (also known as "car seat check locations" or "fitting stations") are in communities across the United States. Certified child passenger safety technicians (CPSTs) have been conducting such inspections for over 20 years. Every time a car seat or booster seat is checked by a CPST, a "CPS inspection" has occurred. Since 1968, when the first seat-belt-restrained car seats designed for crash protection came onto the market, parents and caregivers have recognized the importance of keeping children safe in cars. As car seats became more widespread and several States passed laws mandating that children must ride in car seats, there was a growing need for a way to teach parents and caregivers how to properly install car seats in their vehicles to reduce misuse. In 1997 NHTSA's National Child Passenger Safety Certification Training Program to certify CPS technicians and instructors was implemented. Since then, the hard work and years of dedication by many CPS professionals and national organizations with an interest in traffic safety has led to the successful expansion of CPS inspection stations throughout the United States.

This guide is intended to:

- Define a CPS inspection station,
- Examine the need for permanent CPS inspection stations,
- Address the importance of building community support for CPS inspection stations,
- Discuss the key elements of a successful CPS inspection station, and
- Identify resources for implementing and maintaining CPS inspection stations.

2. What Is a Child Passenger Safety Inspection Station?

Child Passenger Safety inspection stations are designated places where parents and caregivers can learn how to keep children safe while traveling in passenger vehicles by using the appropriate car seat, booster seat, or seat belt correctly. This is done through one-on-one instruction provided by nationally certified CPS technicians on the proper use and installation of car seats.

In general, a CPS inspection station can take one of two forms.

Stationary or Permanent Inspection Station

A permanent site where parents and caregivers can either routinely go or call for appointments to have their car seat checked. These sites can be established indoors or outdoors.

An inside or covered setting is often preferred because it is not affected by weather. Inside locations could include a service garage at a dealership or auto repair shop, a bay at a fire department, or a vehicle inspection bay at a local department of motor vehicles. An outdoor setting is also possible, as long as traffic safety, child safety, and weather considerations are taken into account. Ideal locations have ample space for traffic flow and sufficient parking for CPSTs and other volunteers. Examples of typical location for permanent inspection stations include fire departments, police stations, healthcare facilities or healthcare provider offices, car dealerships and auto service departments, and small office settings such as insurance agencies.

Mobile Inspection Stations

In some communities, it is more practical to provide parents and caregivers with mobile inspection stations that can be moved from place to place. Typically, a van or vehicle pulling a large trailer filled with the necessary equipment to conduct inspections will suffice for this purpose. It can be considered a

permanent CPS inspection station if it travels on a set schedule to accessible locations where the CPS inspection is set up and conducted.

3. The Need for CPS Inspection Stations

Over the years local, State, and national surveys have been conducted on car seat use. They reveal alarming statistics about the risks to children traveling in motor vehicles. Nationally, misuse rates are estimated to be around 46 percent and can be found among all races, and all socio-economic and educational levels.¹ This means that children traveling in every community across the United States may be at risk for serious injuries or death because they are improperly restrained or, even worse, not restrained at all.

The responsibility for proper installation of car seats is placed with the parents or caregivers. However, the wide variety of car seats, booster seats, seat belt systems, and passenger vehicles can make the correct installation of a car seat challenging. Some vehicle designs limit the number of seating positions that can be used with car seats. Some car seats simply don't fit properly in certain vehicles. With so many different vehicle designs, it is a challenge for the car seat manufacturers to explain and demonstrate correct use of every car seat in every type of vehicle. To properly install the car seat, parents must refer to both the car seat manufacturer's instructions and the owner's manual. All cars manufactured after 2002 are equipped with lower anchors and tethers, which aim to help resolve many of these compatibility issues. However, older model vehicles that do not have these installation systems remain in use and will for many years to come. Additionally, lower anchors and tether should not be used when the combined weight of the child and car seat exceeds the amount allowed by both the car seat and vehicle manufacturer. This rule, in effect since 2014, also required child restraint manufacturers to provide clearer labeling to indicate how long lower anchors can be used with each seat. It is understandable that many parents and caregivers seek assistance for:

- Selecting and using the correct car seat or booster seat for the age/size of their child;
- Installing the car seat or booster seat correctly in the vehicle:
- Harnessing the child in the car seat or booster seat correctly;
- Understanding when to transition child passengers to the next type of car seat as they grow; and
- Obtaining information and experience through guided instruction that will lead to self-sufficiency and confidence with keeping children safe in the future.

Inspection stations, also referred to as "fitting stations" or "car seat checks," can be conducted as:

- A public service to educate caregivers about the basics of correct car seat or booster seat installation and detection of incorrect installations or recalled seats;
- Continuing education and hands-on practice for certified CPS technicians;
- A way to encourage compliance with State and local seat belt and child restraint laws.

CPS check events are often sponsored by local law enforcement, fire, and emergency medical services agencies, or public health groups or businesses, and are usually held on an ad hoc basis. They may coincide with community events (e.g., health fair, safety day), or they may be part of a special promotional event sponsored by a local business. Publicity for car seat check events varies based on the

¹ Greenwell, N. K. (2015, May). *Results of the National Child Restraint Use Special Study (NCRUSS)*. (Report No. DOT HS 812 142). Washington, DC: National Highway Traffic Safety Administration. Available at https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812142

size of an event and the sponsoring organizations. Large, high-profile events may be publicized by event sponsors (e.g., vehicle manufacturers/car dealerships, major insurance companies) and may include partnerships with local media outlets (e.g., television, radio, print media). For smaller community events, publicity is often left to the CPS technicians and local community groups. During Child Passenger Safety Week, CPS check events occur across the country. The turnout for CPS check events is often high, and anecdotal evidence suggests that they are important educational resources for parents and other caregivers. However, there are limitations to holding periodic checkup events:

- Parents may learn of the event too late to participate;
- Parents may not be able to get to the event during the scheduled time;
- Inclement weather may cancel or abbreviate the event, as most are held outdoors;
- Long waiting lines can last for 2 to 3 hours;
- The event may be challenging to conduct due to large crowds.

CPS inspection stations are alternative approaches to periodic seat check events. Many of the same community groups (law enforcement, fire and rescue, businesses, and health care organizations) choose to sponsor or support permanent CPS inspection stations rather than host periodic CPS check events. Although the basic operation of an inspection station is similar to the operation of a check event, there are some important differences. A CPS inspection station provides the following advantages.

Advantages of a Permanent Inspection Station

Both mobile CPS check events and permanent CPS inspection stations serve an important public service for the community. However, there are significant advantages to establishing permanent inspection stations.

- **Location:** A designated location within the community that has been chosen to make it accessible and provides adequate shelter for conducting inspections in inclement weather.
- **Schedule:** There is a regular schedule of operation whether it is daily, weekly, or monthly with consistent hours. CPS inspections may be done with or without appointments, depending upon the staffing resources and volunteers available.
- Advertising: A variety of outlets may be used to advertise the inspection station's schedule including permanent signs, social media, voicemail, internet (on participating organizations websites), flyers, and community calendars.
- **Referrals:** Community partners should be familiar with the site's operation so referrals can be made.
- Quality Control: There is often a sponsoring organization with a CPS coordinator who oversees the permanent inspection station in a local community and ensures quality control for inspection activities.
- Single Point of Contact: The coordinator maintains records for all inspections conducted at the
 station and is a consistent point of contact to the community for the inspection station's operation.
 The coordinator should be able to provide information about general CPS issues and make
 referrals to other CPS resources when necessary (e.g., discount/loaner programs, State CPS
 contacts, and CPS technicians experienced in working with children with special health care
 needs).

Each community must decide which method of hands-on CPS education will work best. The decision to maintain a permanent CPS inspection station within the community requires an ongoing commitment from the host agency, many local partners and a great deal of community support.

4. Building Community Support

Creating and operating a CPS inspection station requires support from the community. An active support system helps to insure a program's longevity and prevent the burn-out of individual staff and volunteers who might otherwise take on too many responsibilities.

It is important to identify a sponsoring organization whose leadership will be committed to the long-term successful operation of a CPS inspection station. The CPS inspection station should fit within the core activities conducted by the organization so that it receives appropriate resources and support. Further, the sponsoring organization should be willing to join forces with the community to develop and operate a CPS inspection station.

When building a CPS community partnership that will help develop and implement an inspection station, consider including local opinion leaders and representatives from governing agencies, law enforcement, fire and emergency medical services, public departments of education, health and safety, civic groups, child care agencies, car dealerships, and other local businesses. Including local health agencies, as well as those providing income-based services such as Women, Infants, and Children (WIC), Head Start, etc., who can provide referrals to low-income and otherwise disadvantaged families to inspection stations and potentially access to low-cost or no-cost car seats. To be successful, the CPS community partnership must include several experienced and certified CPS technicians from the community. Encourage members to take the NHTSA National CPS Certification in order to become a CPS technician and provide education at the CPS inspection station. To be listed on NHTSA's inspection station locator, the host organization must stipulate that a currently-certified CPS technician will be on the premises to conduct the inspections during the inspection station's official hours of operation. The State Highway Safety Office's occupant protection coordinator or child passenger safety coordinator can provide information on national- and State-recognized CPS training programs, as well as help identify experienced and certified CPS technicians in the community (Appendix B). They can also provide information on possible funding sources to help support the local CPS inspection station.

Potential partners from local businesses may include those in the immediate vicinity of the proposed inspection site, as well as businesses that cater to the needs of parents and young children, local hospitals and medical centers, car dealerships, local car seat retailers, insurance companies, printing and graphics companies, and any other business that may provide resources or support for the inspection station. Volunteers who are not CPS technicians also play many important roles during inspection stations. Support from community businesses may include promoting the CPS inspection station by placing ads, providing financial or in-kind resources, offering product discounts (e.g., car seats) or permitting the use of their property (e.g., dealerships, parking lots) as the permanent location for the CPS inspection station. **Appendix C** provides a list of materials that are routinely used to operate an inspection station. This "wish list" may be helpful when approaching local businesses for assistance.

Many organizations interested in CPS activities express concerns about liability issues. It may be helpful for the CPS community partnership to seek advice from an attorney and an insurance carrier familiar with liability issues. The sponsoring organization's attorney and insurance carrier may be the best source of information, as they will have a vested interest in liability issues that could pertain to the operation of the inspection station. Experienced risk-reduction professionals can also provide valuable advice on developing a written set of policies for the safe operation of the CPS inspection station. **Appendix E** provides additional information on reducing the risk of liability.

While building community support, be sensitive to the racial and ethnic diversity of the community. If necessary, recruit bilingual technicians and volunteers from the community. Local census data can be used to better understand the presence of sub-populations in the community (i.e., immigrants, refugees, or specialized groups). By working with local agencies that provide direct services to such families, Child Passenger Safety training courses can be set up to train members of these groups to serve as CPS technicians. They frequently have greater familiarity and credibility with the population at hand, and their bilingual/multilingualism can help ensure that services are provided in a helpful way. Education material should be made available (whenever possible) in the primary language of the clients. It is important to have bilingual members of the community review any translated education material for linguistic accuracy and cultural appropriateness.

When choosing a potential location for the CPS inspection station, the CPS community partnership should be consulted before plans are finalized. There may be a variety of issues to consider such as volunteer and CPS technician staffing, traffic flow, vehicle accessibility for parents and CPS staff, community safety and socio-economic considerations (**Appendix A**). A diverse community partnership can help address these issues at the start of the process.

Once the CPS inspection station is ready to provide services, be sure local media are informed. Consumer and traffic reporters would likely be interested in the CPS inspection station story as a resource for the community. Invite them to a kick-off event or to take a tour of the inspection station. Keep the media aware of how the program is operating (e.g., number of seats inspected each month, observed misuse) and be certain to let them know of any success stories resulting from CPS inspections. It's a good idea to have a one-page fact sheet available for the media and for other public inquiries. Include information such as:

- Purpose of the CPS inspection station;
- Benefits of a permanent location;
- Location and directions;
- Hours of operation;
- Contact name (CPS coordinator);
- Phone number and website address; and
- Fee, if applicable, or suggested donation.

Finally, don't expect everything to be perfect from the beginning. It may be better to start small and to expand services over time, so that staff and resources are not overwhelmed. Be flexible in operating the CPS inspection station without compromising the safety of clients or staff. Be receptive to suggestions for improvements. Periodically, ask for feedback from inspection station clients and the community at large. It may be helpful to keep a list of up-to-date CPS technicians to staff the inspection station or community events if necessary and encourage community members and leaders to get certified. The more CPS technicians available, the less volunteer burnout, and better-staffed CPS check events.

It may also be useful to periodically review the contributions made by members of the CPS community partnership. Are all the member organizations committing resources (financial or in-kind) to the inspection station effort? Can member organizations be called upon to expand their initial commitment of resources? How are members being recognized in the community for their contributions? Do they feel invested in the successful operation of the CPS inspection station? Do they have suggestions for improvement?

5. Financial Considerations

It is important to have a well-developed financial plan that identifies operating expenses as well as shortand long-term funding sources.

Expenses

This will include equipment and supplies, promotional material, program administration, training, and travel.

Replacement Seats and Extra Seats

The CPS community partnership will need to consider whether resources are available for the inspection station to replace damaged, outdated or recalled car seats or to provide them to families who arrive at the inspection station without car seats for all the children in their care. Although there is no obligation to provide free or discounted car seats, maintaining at least a modest supply of car seats to provide to low-income or otherwise disadvantaged families on a case-by-case/as-needed basis is encouraged. However, it is best not to promote or publicize that "free car seats" will be available. In cases where families receive referrals from local social service agencies, a voucher for a car seat may be provided in advance to motivate such families to visit the inspection event. If car seats are available, a written policy for seat distribution should be developed. If replacement seats are not supplied, it is advisable to provide an accurate list of community resources that offer car seats for families in need. Education on use and installation should always accompany the distribution of car seats free of charge or at a reduced cost.

Salaries

Staff resources will significantly affect the hours of operation and the amount of community outreach that can be conducted by a CPS inspection station. There must be a clear and realistic agreement about the commitment of paid staff time provided by the sponsoring organization and/or other agency members. Administrators may not fully understand the time commitment necessary for the successful operation of a CPS inspection station and may consider it as an additional work task for employees. This could be devastating to the program if staff must later be removed because too much time is spent operating the inspection station. The CPS community partnership will likely need to recruit and retain a reliable group of volunteers to help offset the need for paid staff. CPS technicians must be on hand at all times while the inspection station is open to ensure the proper educational instruction services are provided.

Funding

Short- and Long-Term Funding Sources

After initial startup funds have been secured, the process of fundraising is an ongoing process. CPS community partnership members should always be alert to potential funding sources, including contributions from local businesses; public and private grant programs; and individual contributions. State Highway Safety Offices may have access to funding through Federal grants. It is not advisable to rely on a single source of financial support, as organizations lose money, budgets get cut, and grant programs are discontinued. Obtaining financial support from several sources may provide long term stability for the CPS inspection station program. If your agency is able to accept donations, be sure to set up adequate documentation and, when needed, receipts.

In-Kind Contributions

Consider the various types of in-kind contributions that could be made to help offset financial expenses. Time volunteered by community partnership members (or staff time donated by member organizations), CPS professionals, community residents, and service groups can be a tremendous benefit. In addition, contributions of space, office services, equipment, supplies and refreshments can save the program a significant amount of money. Post a "wish list" of needed contributions at the inspection station and include it when publicizing the CPS services within the community.

Fee for Service

Determine whether CPS inspections will be provided free of charge, with a requested donation or with a service fee. Be sure this information is provided to everyone who may use the CPS inspection service by posting it at the inspection station and including it in all publicity material. A sliding-fee scale based on ability to pay can be highly beneficial. Consider that the parent or caregiver may increase their acceptance of the safety device if they have to make at least a token contribution.

6. Data Collection

Every CPS inspection station should have a system in place for collecting and recording inspection data. There are several standardized CPS checklists already in use by inspection stations across the country. Contact the State Highway Safety Office's occupant protection coordinator to determine which checklist is used by other CPS inspection stations in the state. Electronic check forms are a new option for recording data that allows for the information to be securely entered on a tablet or smartphone during inspections, and later uploaded when an internet connection is available. Coordinated data collection efforts can provide traffic safety experts with important information about the use and misuse of car seats and seat belts in local communities and statewide. This information can then help create a better picture of car seat use across the country. In addition, data collection helps validate the need for CPS inspection stations and can provide convincing information of the need for these activities to potential funding sources. Please note that any data collection activities must meet all applicable Federal, State, or local requirements, including any requirements that set conditions on the collection and use of any personally identifiable information.

7. Conclusion

This guide provides the reader with a general understanding of the concept and operation of a CPS inspection station. Just as no one seat is right for every vehicle, there is no one format for a CPS inspection station that is right for every community. Networking with other CPS community partnerships will generate additional ideas and resources for developing and operating CPS inspection stations. It can also help to identify potential pitfalls and possible solutions when problems do arise. The best way to locate other CPS community partnerships will be through the State occupant protection coordinator, and if applicable the child passenger safety coordinator. The best CPS inspection station is the one that fits the needs of families, fits within the community it serves, takes special local cultural, linguistic and economic considerations into account, and is easily accessible.

Special Considerations for First Responders

Scheduling and staffing CPS inspections are common challenges faced by many inspection stations sponsored by local emergency response organizations such as police, fire and rescue, and emergency medical services (EMS). These organizations are very committed to injury prevention and CPS, often requiring staff to be trained and certified as CPS technicians. Many choose to operate CPS inspection stations on a weekly basis or even daily basis.

However, scheduling on-duty personnel who are trained and certified as CPS technicians to conduct inspections poses a potential challenge, because at any time these people may be called away to respond to emergency situations. Parents and caregivers can be left waiting at police stations and firehouses until the CPS technicians return from emergency calls. Many emergency response organizations have tried to resolve this problem by paying off-duty personnel overtime to conduct CPS inspections or having on-call back-up technicians available if someone is sent out on an emergency call. All first-responder sites should tell CPS clients in advance that the scheduled inspection may be postponed if an emergency call arises.

There is no one answer to the scheduling problem for first-responders. Networking with other emergency response organizations that are successfully operating CPS inspection stations can help generate possible solutions.

APPENDIX A. Setting the Stage

Introduction

Assisting caregivers with their car seats can be accomplished through CPS inspection stations (also known as fitting stations), car seat check events or through one-on-one interactions. NHTSA maintains a Child Passenger Safety Inspection Station Locator, which lists inspection sites by State or ZIP Code.

Setting the Stage

Whether the inspection station is held at an indoor or outdoor setting, it is important to remember that safety is the number one priority for staff and participants. To the extent possible, all CPS inspection station facilities should be accessible to individuals with disabilities in accordance with the <u>Americans</u> With Disabilities Act.

Indoor Setting

An indoor setting provides many benefits, especially protection from the weather. However, there are still precautions that must be taken when setting up an indoor CPS inspection station:

- Designate where the vehicles wait in line prior to the inspection. Be sure to have the driver turn the engine off to prevent any accidental acceleration of the car and unnecessary emissions of noxious fumes in a closed setting. Have a clearly defined path for the vehicle to follow at the conclusion of the inspection ideally the vehicles will enter in one side of the facility and exit from the other side to avoid backing up. Announce any moving vehicles.
- Have a couple of people perform a walk-through of the event venue to ensure that there are no safety hazards anywhere in the vicinity.
- Make certain the location is safe for families. A designated waiting area should be made available for families with young children while the inspection takes place. Staff or a responsible volunteer should be assigned to the waiting area to ensure that no child is lost or injured. If possible, clean, age-appropriate toys in good condition should be made available to occupy young children.
- Keep the area as clean as possible.
- Bathrooms should be easily accessible to the waiting area. Be sure they are clean and operational before each scheduled inspection event.
- Designate an area to keep equipment and a place where unsafe seats can be stored prior to destruction or other appropriate disposal. (Note: Car seat recycling may be available in your community.)
- If the inspection location is at an auto dealership, fire department, or auto repair shop, be certain that ALL employees are notified that children will be in the area during the inspections event.
- Have clearly written signs set up as appropriate to provide direction to parents and caregivers.

Outdoor Setting

An outdoor setting provides unique advantages (usually more space) and disadvantages (i.e., traffic and weather considerations), for the operation of a CPS inspection station. In addition to the above safety considerations, the following precautions should be taken when hosting an outdoor inspection station.

- Be sure the inspection area can be set up out of the flow of routine traffic.
- Have clear "Enter" and "Exit" areas designated by signs and traffic cones.
- If there is not an indoor waiting area available, create a clearly defined "safe area" away from waiting and moving vehicles with rope, tape, tents, and/or traffic cones.
- Be sure to have a traffic coordinator available to direct waiting vehicles safely in and out of the inspection site.
- The inspection teams should be set up at well-spaced and clearly marked designations.
- Be sure to have sufficient equipment available to staff at each inspection area in order to minimize the amount of foot traffic around the inspection site.

APPENDIX B. Resources

Resources for current injury and misuse rates in your community and across the country include the following.

- National Highway Traffic Safety Administration (https://www.nhtsa.gov/equipment/car-seats-and-booster-seats)
- National Child Passenger Safety Board (https://www.cpsboard.org/car-seat-safety/)
- Safe Kids Worldwide (https://www.safekids.org/car-seat)
- American Academy of Pediatrics (AAP) (<u>www.aap.org</u>)
- Centers for Disease Control and Prevention (CDC) (https://www.cdc.gov/injury/features/child-passenger-safety/index.html 1)
- Governors Highway Safety Administration (GHSA) (https://www.ghsa.org/state-laws/issues/Child-Passenger-Safety)
- Insurance Institute for Highway Safety (IIHS) (https://www.iihs.org/topics/child-safety)
- National Safety Council (https://www.nsc.org/road-safety/safety-topics/child-passenger-safety)
- State and local health departments
- Car seat, booster seat, and vehicle manufacturer websites

APPENDIX C. Outfitting the CPS Inspection Station Equipment/Supplies

The following are basic supplies used to operate a CPS inspection station. Items marked with an asterisk* are primarily used for outdoor settings.

- Current recall list
- Car seats for use as loaners or giveaways in the event that a seat must be replaced (ifavailable)
- Car seat manufacturers' instructions
- CPS education material, including details of the applicable State car seat law
- List of nearby stores where new seats can be purchased if necessary
- Inspection forms
- Locking clips
- Clipboards
- Pens and pencils
- Latex gloves
- First aid kits
- Anti-bacterial soap/lotion
- Waste receptacles
- Demonstration dolls for use when the child is not present to show correct use
- Tape
- Storage bins
- Traffic cones*
- Barricades*
- Chalk to mark lanes*
- Tents*
- Event signage*

APPENDIX D. Staffing the CPS Inspection Station

The certified CPS technician has a central role in conducting car seat inspections. However, there are other duties and responsibilities that are very important to the successful operation of an inspection station and must be handled efficiently and professionally. In an ideal situation, people would be assigned separate roles in operating the CPS inspection station, but in most cases, one person may have several roles to play. One of the most important aspects of staffing is to assure that all individuals understand their roles and responsibilities in the process. This is critical so as not to confuse participants regarding traffic flow, greeting arriving vehicles, and providing education during the seat check process.

Coordinator

The coordinator is responsible for all the administrative needs essential to the smooth, efficient operation of a CPS inspection station. The duties of the coordinator may include responding to calls from the public, scheduling and confirming inspection appointments, securing certified CPS technicians, ordering supplies, gathering the data collected from the inspection forms, filing the inspection forms, and maintaining current education materials and a current car seat recall list. The coordinator should always have access to the inspection station's written operating policies. The coordinator may also be responsible for many of the marketing and publicity activities. The coordinator does not have to be a certified CPS technician, but should have some formal CPS training, be knowledgeable about current CPS issues and display a sincere commitment to promoting CPS initiatives within the community.

Greeter

Depending upon the level of activity at an inspection station, the coordinator may also serve as the "greeter." The greeter helps to ensure the smooth operation of the inspection station. If there is waiting time involved, the greeter can provide general CPS information, talk to the parent or caregiver about the inspection process, hand out the inspection form, and direct vehicles to the next available CPS technician.

Scribe/Recorder

Using the inspection station's approved data collection form (hardcopy or electronic), the scribe gathers information about the vehicle and its passengers from the vehicle driver, checks for car seat recalls, records information regarding seating positions, misuse, corrections made, seats installed and education information provided to the driver by the certified CPS technician. The scribe insures that all forms are signed and dated by the driver, the certified CPS technician and the lead CPS technician, ensures that the completed forms are submitted or placed in the designated location.

If a new car seat is installed, the scribe also ensures that the driver completes the manufacturer's recall information card. The coordinator is encouraged to mail the completed cards on behalf of the parents to ensure that the cards reach the child car seat manufacturers right away. Far too many car seats are never registered, thus exposing child passengers to unnecessary risk in the event their seat is recalled by the manufacturer. Car seats can also be registered online at manufacturer websites and at www.nhtsa.gov/equipment/car-seats-and-booster-seats#registration.

Certified CPS Technician

It is recommended that experienced and certified CPS technicians perform the actual seat inspections and educate the parents or caregivers. National certifications for all participating CPS technicians must be current because the field of child passenger safety changes quickly and ensuring technicians are up-to-date is critical to providing quality, accurate education to parents and caregivers and minimizing liability

concerns. The technician's main role is educator. The technician is responsible for the inspection of the car seat, demonstrating to the parent or caregiver how to properly install the seat and secure the child, and deciding whether to replace a seat. In addition, the technician should also ensure that any replaced seats are properly disposed of to prevent further use (unless used in a training course).

Lead CPS Technician

The term "lead CPS technician" is used here to generally identify certified CPS technicians and/or instructors who serve as a "second pair of eyes" for reviewing the installation of car seats before the parent or caregiver leaves the inspection station. The lead CPS technician (also commonly known as the senior checker) also assures that the car seat inspection checklist form is correctly completed. At CPS inspection stations that operate with multiple certified technicians, it is advisable to have at least one lead CPS technician available to serve in this capacity. When CPS inspections occur with only one available certified technician, this is not possible. The National CPS Certification Training Program does not identify the roles and responsibilities of a lead CPS technician, as this person's role may vary by community. Regardless, if a lead CPS technician is used, that person's certification must be current and the technician should attend periodic CPS update classes to keep abreast of CPS issues and changing technologies.

Traffic Coordinator

Traffic coordinators are typically law enforcement officials, as they usually have experience directing vehicles and insuring the public's safety. This position is most appropriate to inspection stations held at outside locations. However, depending upon the volume of traffic, it may be necessary to have a traffic coordinator at any CPS inspection site.

Important Reminder: Although many people play significant roles in the operation of a CPS inspection station, the most critical role is that of the parent or caregiver. The knowledge gained from the CPS inspection experience is meant to empower the parent or caregiver to properly install and use an appropriate car seat for his or her child. For this reason, the parent or caregiver should always have a hands-on role in the inspection process and be the last person to install the car seat using the education, guidance and assistance of the CPS technician or instructor.

APPENDIX E. Liability Concerns

The following considerations may provide some assistance in crafting a liability prevention protocol for the CPS inspection station. However, it is advisable to consult with an attorney and insurance carrier knowledgeable and experienced in liability/risk-reduction issues for specific guidance. If the CPS inspection station is part of a larger network of inspection stations, be sure that every station is following the same written procedures.

- **Provide Accurate and Current Information:** All information distributed at CPS inspection stations should come from credible sources and reflect current traffic safety issues, legislative provisions and technologies. Contact the State occupant protection coordinator to determine what material is recommended for distribution.
- Teach Correct Installation and Use of Car Seats: The most critical role at a CPS inspection is played by the parent or caregiver. Parents and caregivers that attend an inspection event want to be sure that their children are properly restrained and well protected. The objective of every CPS inspection service should be to teach parents and caregivers how to keep child passengers safe using the appropriate car seat, booster seat, or seat belt correctly. The inspection should include a one-on-one tutorial by a certified CPS technician that provides hands-on instruction on the proper use and installation of car seats. The parent or caregiver should always have a hands-on role in the inspection process and should be the last person to install the car seat using the education, guidance and assistance of the technician or instructor, before the vehicle leaves the CPS inspection station.
- **Refer to Owner's Manuals:** Certified CPS technicians should encourage parents to consult their vehicle owner's manual and the car seat instructions to help answer specific questions. Technicians should check each seat for possible recalls using the most current recall list available. An updated recall list can always be found on the <u>Recalls page</u> on the NHTSA website.
- Be Consistent With All Inspection Procedures: Inspection station staff should be clear about their roles prior to each inspection event. The coordinator will ensure that all roles are covered and that all necessary materials and equipment are readily accessible. When possible, a lead CPS technician (senior checker) should be responsible for quality control of the inspections conducted. The lead CPS technician should check each seat and review and approve each data collection form before a family leaves the inspection station. Consistent use of a standardized CPS checklist will help insure the quality of every CPS inspection. Most checklists require that the parent or caregiver sign the form to acknowledge the advice, education and information they have received. The parent or caregiver's initials may also be required following the completion of the inspection. Most standardized forms include a waiver/release of liability that has been prepared by an attorney. Completed forms should be collected and retained by the coordinator.
- Have a Clear Written Policy About Replacement Seats: All staff should be aware of the written policy for replacing car seats and disposing of old, damaged or recalled seats. The policy should specify whether replacement seats will be provided without charge, or with a requested donation or for a specific purchase price and describe the process for disposing of damaged or unsafe seats. It should also include how to process referrals from social service agencies. The coordinator should ensure that there are a variety of car seats for children of differing sizes and

ages available as replacement seats. If a replacement seat is provided, the parent or caregiver should complete the product recall registration card before leaving the inspection station. The coordinator mails all completed cards immediately so that, in the event of a recall, the car seat manufacturer can notify the parent or caregiver. If replacement seats are not supplied, it is advisable to provide an accurate list of community resources that offer car seats for families in need.

- Make Safety a Priority: The traffic coordinator should ensure that vehicles and people can move safely in and around the CPS inspection station. The safety of young children should be a top priority. The sponsoring organization or site host may have additional considerations to ensure that CPS inspections are conducted in a safe, consistent and professional manner. Be sure to communicate all requirements and procedures to every staff member (paid and volunteer) participating in CPS inspection activities.
- **Liability Coverage:** There are several options for obtaining liability insurance to cover CPS inspection stations. Again, it is advisable to first consult the sponsoring organization to determine how liability protection will be addressed. The following are the most common types of liability coverage used by CPS inspection stations:
 - State Law: Many States have a "Good Samaritan" law that may cover the type of services provided by the CPS inspection station. In addition, several States have enacted "CPS services immunity" laws to specifically cover certified CPS technicians. Consult the State occupant protection coordinator to determine whether such laws exist in your State.
 - General Policy: The activities of the CPS inspection station may be covered under the general insurance policy (or through an additional rider) of the sponsoring organization. Consult with the sponsoring organization about specific terms and conditions.
 - Special Policies for National Organizations: Some national organizations that conduct large numbers of CPS inspections have secured special liability coverage for their members. If the CPS inspection station is being sponsored by a national organization, it may have liability protection under such a policy. Consult the sponsoring organization about specific terms and conditions.



