

## Vermont Chapter

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American Academy of Pediatrics  
DEDICATED TO THE HEALTH OF ALL CHILDREN®



To: Chair Lyons and Members of the Senate Health & Welfare Committee  
From: Stephanie Winters, VMS Deputy Director & AAPVT/VTAFP Executive Director  
Date: February 27, 2024  
Re: Support for S.187 – Student Application of Sunscreen

I am writing on behalf of the American Academy of Pediatrics Vermont Chapter, Vermont Academy of Family Physicians, and the Vermont Medical Society in full support of S.187 – An act relating to student application of sunscreen. Collectively, these three organizations represent over 3000 Vermont physicians and physician assistants.

Exposure to UV radiation from the sun is the leading environmental cause of melanoma and nonmelanoma skin cancers.<sup>i</sup> Childhood sun exposure is a key risk factor for future skin cancer development.<sup>ii</sup> Incidence rates of skin cancer continue to rise and primary prevention of skin cancer remains a public health challenge.

Regular use of sunscreen during childhood has been estimated to reduce lifetime skin cancer risk by up to 80%.<sup>iii</sup> Often used as a stand-alone primary prevention method, sunscreen is the most common form of sun protection used by children and by parents. Studies show that more than 40 percent of an individual's lifetime UV exposure a person occurs within the first 20 years of life.<sup>iv</sup>

Barriers to allowing students to use sunscreen put them at significant risk of sun damage. Sunscreen is classified by the United States Food and Drug Administration (FDA) as an over-the-counter drug product.<sup>v</sup> Schools across the country have implemented broad 'medication bans' which require students to have a note or prescription from a physician in order to have over-the-counter drug products, including sunscreen, at school. The CDC believes that school policies that prohibit student possession of sunscreen and sun-protective clothing can create barriers to the use of important sun protection.<sup>vi</sup>

The American Medical Association<sup>vii</sup>, American Academy of Dermatology Association<sup>viii</sup> and the American Society for Dermatologic Surgery Association<sup>ix</sup> all support the exemption of sunscreen from over-the-counter medication possession bans in schools and encourage policy making to allow students to bring and possess sunscreen at school without restriction and without requiring physician authorization.

We hope the committee sees the extreme value of allowing students to possess and apply sunscreen as a proven cancer prevention tool. I hope you will join us in our support of S.187.

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- <sup>i</sup> <https://jamanetwork.com/journals/jamadermatology/fullarticle/1149913#ref-dst110035-1>
- <sup>ii</sup> <https://jamanetwork.com/journals/jamadermatology/fullarticle/1149913#ref-dst110035-2>
- <sup>iii</sup> <https://jamanetwork.com/journals/jamadermatology/fullarticle/1149913#ref-dst110035-10>
- <sup>iv</sup> Thomas, N., et.al.; Number of Nevi and Early-Life Ambient UV Exposure Are Associated with BRAF-Mutant Melanoma. *Cancer Epidemiol Biomarkers Prev* 2007; 16: 991-997
- <sup>v</sup> 21CFR352. Retrieved January 8, 2020. [ecfr.gov](http://ecfr.gov).
- <sup>vi</sup> Skin Cancer Prevention Progress Report 2017. Atlanta, GA: Centers for Disease Control and Prevention, US Dept. of Health and Human Services.
- <sup>vii</sup> AMA Policy: Permitting Sunscreen in Schools; H-440.841  
AMA Policy: Protecting the Public from Dangers of Ultraviolet Radiation”; H-440.839
- <sup>viii</sup> [https://server.aad.org/forms/policies/Uploads/PS/PS-Access%20to%20Sunscreen\\_Sun%20Protective%20Clothing.pdf](https://server.aad.org/forms/policies/Uploads/PS/PS-Access%20to%20Sunscreen_Sun%20Protective%20Clothing.pdf)
- <sup>ix</sup> <https://www.asds.net/Portals/0/PDF/asdsa/asdsa-position-statement-sun-safe-behavior-in-school-aged-children.pdf>