



# **Children's Sleepwear Standard Operating Procedure (SOP)**

# Kohl's Product Integrity

## Children's Sleepwear Standard Operating Procedure (SOP)

The Consumer Product Safety Commission sets national standards for children's sleepwear flammability. These standards are intended to protect children from serious burns if they come in contact with an open flame, such as a match, lighter, stove burner, etc.

**Children's Sleepwear is defined as any product of wearing apparel such as robes, nightgowns, sleepers, pajamas, and loungewear that are primarily used for sleeping or activities related to sleeping.** Underwear and boxer shorts sold individually or as a set must be merchandised with underwear and are not considered sleepwear. All children's sleepwear must comply with Flammability Standards 16 CFR 1615, 16 CFR 1616 and 16 CFR 1610.

The CPSC has categorized children's sleepwear into two classifications:

1. **Snug-Fitting and**
2. **Flame Resistant**

The information in this manual is intended only as a summary of the requirements. For a thorough explanation of the requirements for all children's sleepwear manufacturing, testing, and record keeping, refer to Flammability Standard 16 CFR 1615, 16 CFR 1616 and 16 CFR 1610.

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# 1. Design Considerations

## 1.1 Design Considerations for both Snug-Fitting and Flame Resistant Sleepwear

To ensure clear differentiation between children's sleepwear and general wearing apparel, vendors must follow the guidelines below:

- **The same prints and/or patterns may be used across both snug-fitting and flame-resistant sleepwear.**
- However, prints and/or patterns used for any children's sleepwear—regardless of colorway—may not be used in general wearing apparel sold in the store and vice versa.
- Extracting or isolating a portion of an all-over print/pattern from a non-sleepwear item to apply to children's sleepwear is also prohibited.

All sleepwear must feature artwork that is distinct from general apparel to maintain compliance with Kohl's standards.

**However**, the use of the same broad-theme prints/patterns in both sleepwear and other products is allowed. For example, it is acceptable to use star themes on both sleepwear and general wearing apparel. The star color/shape/size/repeat used on sleepwear must be different from the color/shape/size/repeat used on all general wearing apparel within the store (See example below).



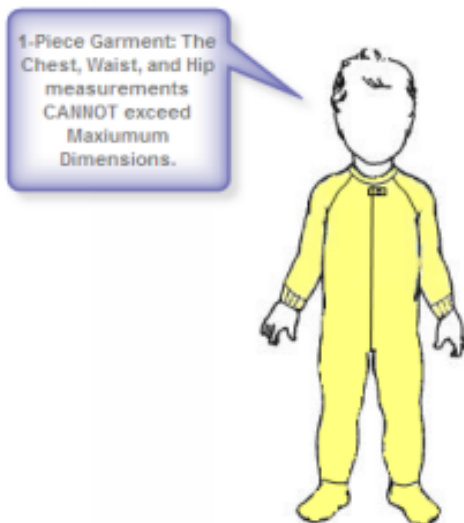
NOTE: If you plan to use a brand logo in the print/pattern on your sleepwear please contact Kohl's Product Integrity for further guidance.

## 1.2 Snug-Fitting Sleepwear (referenced in the Kohl's Tech Design Pack)

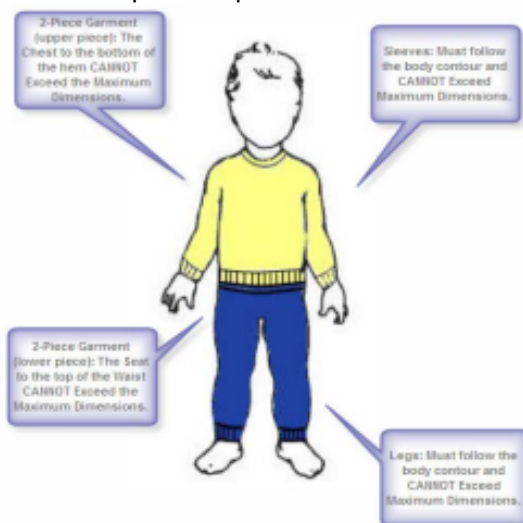
- No gowns are allowed in snug-fitting sleepwear
- Knit fabrics must easily recover back to their original shape/size
- Loose edges such as drawstrings and ties are not allowed.
- Pockets should be small and self-closing, no flaps on pockets are allowed.
- No snaps or buttons located on the wrist/ankle cuffs are allowed as they could potentially be left undone during wear.
- Any decoration, ornamentation, or trim (i.e. lace, appliqués, ribbon or drawstrings), which extends more than 1/4" (6 millimeters) to the outer surface of the garment, is **NOT** allowed.
- Lettuce edging that stretches the fabric in a ruffle at the end of short/long sleeves, pants, or the lowest part of a top is **NOT** allowed.



- H. TOPS: The garment cannot have sleeves which exceed the maximum dimensions for the upper arm and the wrist. They must diminish in width gradually from the upper arm to the wrist.
- I. BOTTOMS: The garment cannot have legs which exceed the maximum dimensions for the thigh and the ankle. They must diminish in width gradually from the thigh to the ankle.
- J. ONE PIECE GARMENT: The garment must have a width which does not exceed the maximum dimensions for the chest at any point between the chest and the waist. It must diminish gradually from the chest to the waist and have a width which does not exceed the maximum dimension for the seat at any point between the seat and the waist and diminishes gradually from the seat to the waist.

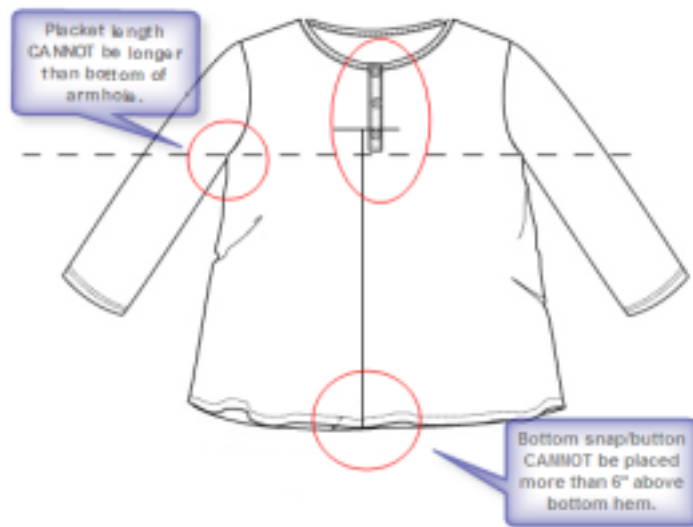


- K. TWO PIECE GARMENT (UPPER PIECE): The upper garment must have a width which does not exceed the maximum dimensions for the chest at any point between the chest and the bottom of that piece. It must also diminish gradually from the chest to the bottom of that piece.
- L. TWO PIECE GARMENT (LOWER PIECE): The lower garment must have a width which does not exceed the maximum dimension for the seat at any point between the seat and the top of the lower piece. It must also diminish gradually from the seat to the top of that piece.



### 1.3 Flame Resistant Sleepwear

- A. Sleepwear top can be left completely open (unbuttoned).
- B. Top that is open along the side seam or has a shirttail hem.
- C. TOPS: Design of opening placket should be no lower than the base of the armpits.
- D. TOPS: If applicable, the lowest fastening must be within 6 inches from the hem.
- E. Fabrication should be 100% Polyester.**
- F. No flame retardant finishes and/or chemicals are to be applied to fabric and/or finished garment.**



### 1.4 Flame Resistant Thread

To minimize the potential for flammability testing failures, all children's sleepwear conforming to 16 CFR 1615/1616 **should be constructed using a Flame Resistant Thread** specifically designed for children's sleepwear, referenced within Kohl's Tech Design Pack.

**Flame resistant thread should be purchased from one of our nominated thread suppliers, that list can be found on K-Link** (Private and Exclusive Brands > Preferred Trim Suppliers > Thread Suppliers)

## 2. Exemptions

2.1 The following items are exempt from meeting 16 CFR 1615/1616 Flammability standards:

- A. Diapers and Underwear
- B. Infant Apparel sized 9 months or smaller, intended for use by infants, are not required to meet the standard, if any of the following applies:
  - i. A one-piece garment that does not exceed 23  $\frac{3}{4}$ " in length.
  - ii. A two-piece garment, each piece does not exceed 15  $\frac{3}{4}$ " in length.
  - iii. Care label stating the size in MONTHS, the age of the child for whom it is intended,  
Example: 0 to 3 mos. or 9 mos.
  - iv. All fabrics and garments comply with Standard for the Flammability Clothing Textile 16 CFR, Sec. 1610
  - v. When the "exemption" applies for infant size ranges, a garment or web warning should not be applied.
- C. Snug Fitting Sleepwear

### 3. Vendor Requirements

Vendors are required to submit the following documents prior and during product testing to Kohl's Quality Assurance/Product Integrity Team.

#### 3.1 Flammability Testing Tracking Chart

- A. It is the vendor's responsibility to submit the testing chart to Kohl's Product Integrity via email at [quality.assurance@kohls.com](mailto:quality.assurance@kohls.com) after each test stage has been completed for each style/program (i.e. fabric, seams, etc.).

### 4. Product Testing

Kohl's requires **children's sleepwear** to be tested and meet 16 CFR 1615/1616 standards. This includes all mills and factories used to produce children's sleepwear for Kohl's. It is the vendor's responsibility to assure that all test requirements have been met prior to shipment.

4.1 The chart below explains what flammability standard is required for each type of garment.

Product Sleepwear/Loungewear	Requirements		
	16 CFR 1615/1616	16 CFR 1610	Tight Fitting Specs 16 CFR 1615/1616
Flame Resistant	•		
Tight Fitting		•	•
Innerwear & Long Underwear		•	

#### 4.2 Children's Sleepwear Test Request Form (TRF)

It is the factory and vendor's responsibility to make sure the correct TRF is used when submitting samples for testing for this product category. All information must be completely filled out and accurate prior to submission to the 3rd Party Lab.

#### 4.3 Fabric & Garment Performance Testing

Follow the guidelines as outlined in the Kohl's Testing Program Overview Policy. This policy can be found on **K-Link** ([link.kohls.com](http://link.kohls.com))> **Private and Exclusive Brands> Performance Testing> Softlines – Apparel & apparel Accessories.**

#### 4.4 Snug Fitting Sleepwear

- A. Apparel sized greater than 9 months is not required to meet the Children's Sleepwear Flammability Standard, if each of the sizes does not exceed maximum dimensions specified for the chest, waist, seat, upper arm, thigh, wrist and ankle as per the Kohl's Tech Design Pack.
- B. CPSC Measurements are measured in whole circumference while Kohl's TD measurement specs are not. When measuring garments, garments should be measured following Kohl's How To Measure (HTM) guidelines as per Kohl's TD specs, while still within CPSC requirements.**
- C. **FOR REFERENCE:** Sizing Chart below for Snug Fitting is as per CPSC 16 CFR 1615/1616.

## Maximum Dimension Sizing Chart for Snug Fitting Children's Sleepwear

Size/ Max. Dimensions	Chest	Waist	Seat	Upper Arm	Thigh	Wrist	Ankle
<b>9-12 mos.</b> cm (Inches)	48.3 (19)	48.3 (19)	48.3 (19)	14.3 (5 5/8)	26.7 (10 ½)	10.5 (4 1/8)	13 (5 1/8)
<b>12-18 mos.</b> cm (Inches)	49.5 (19 ½)	49.5 (19 ½)	50.8 (20)	14.9 (5 7/8)	28.3 (11 1/8)	10.5 (4 1/8)	13.1 (5 3/8)
<b>18-24 mos.</b> cm (Inches)	52.1 (20 ½)	50.8 (20)	53.3 (21)	15.6 (6 1/8)	29.5 (11 5/8)	11 (4 ½)	13.6 (5 3/8)
<b>2 cm</b> (Inches)	52.1 (20 ½)	50.8 (20)	53.3 (21)	15.6 (6 1/8)	29.8 (11 ¾)	11.4 (4 ½)	14 (5 ½)
<b>3 cm</b> (Inches)	53.3 (21)	52.1 (20 ½)	56 (22)	16.2 (6 3/8)	31.4 (12 3/8)	11.7 (4 5/8)	14.9 (6 ¼)
<b>4 cm</b> (Inches)	56 (22)	53.3 (21)	58.4 (23)	16.8 (6 5/8)	33.0 (13)	12.1 (4 ¾)	15.9 (6 ¼)
<b>5 cm</b> (Inches)	58.4 (23)	54.6 (21 ½)	61.0 (24)	17.5 (6 7/8)	34.6 (13 5/8)	12.4 (4 7/8)	16.8 (6 5/8)
<b>6 cm</b> (Inches)	61.0 (24)	55.9 (22)	63.5 (25)	18.1 (7 1/8)	36.2 (14 ¼)	12.7 (5)	17.8 (7)
<b>6X cm</b> (Inches)	62.9 (24 ¾)	57.2 (22 ½)	65.4 (25 ¾)	18.7 (7 3/8)	37.8 (14 7/8)	13.0 (5 1/8)	18.7 (7 3/8)
<b>7 Boys cm</b> (Inches)	63.5 (25)	58.4 (23)	66 (26)	18.7 (7 3/8)	37.2 (14 5/8)	13.0 (5 1/8)	18.7 (7 3/8)
<b>7 Girls cm</b> (Inches)	63.5 (25)	58.4 (23)	67.3 (26 ½)	18.7 (7 3/8)	38.7 (15 ¼)	13.0 (5 1/8)	18.7 (7 3/8)
<b>8 Boys cm</b> (Inches)	66 (26)	59.7 (23 ½)	67.3 (26 ½)	19.4 (7 5/8)	38.4 (15 1/8)	13.3 (5 ¼)	19.1 (7 ½)
<b>8 Girls cm</b> (Inches)	66 (26)	59.7 (23 ½)	71.1 (28)	19.4 (7 5/8)	41.3 (16 ¼)	13.3 (5 ¼)	19.1 (7 ½)
<b>9 Boys cm</b> (Inches)	68.6 (27)	61.0 (24)	69.2 (27 ¼)	20 (7 1/8)	39.7 (15 5/8)	13.7 (5 3/8)	19.4 (7 5/8)
<b>9 Girls cm</b> (Inches)	68.6 (27)	61.0 (24)	73.7 (29)	20 (7 7/8)	42.6 (16 ¾)	13.7 (5 3/8)	19.4 (7 5/8)
<b>10 Boys cm</b> (Inches)	71.1 (28)	62.2 (24 ½)	71.1 (28)	20.6 (8 1/8)	41.0 (16 1/8)	14 (5 ½)	19.7 (7 ¾)
<b>10 Girls cm</b> (Inches)	71.1 (28)	62.2 (24 ½)	76.2 (30)	20.6 (8 1/8)	43.8 (17 1/4)	14 (5 ½)	19.7 (7 ¾)
<b>11 Boys cm</b> (Inches)	73.7 (29)	63.5 (25)	73.7 (29)	21 (8 ¼)	42.2 (16 5/8)	14.3 (5 5/8)	20 (7 7/8)
<b>11 Girls cm</b> (Inches)	73.7 (29)	63.5 (25)	78.8 (31)	21 (8 ¼)	45.1 (17 ¾)	14.3 (5 5/8)	20 (7 7/8)

## Maximum Dimension Sizing Chart for Snug Fitting Children's Sleepwear

Size/ Max. Dimensions	Chest	Waist	Seat	Upper Arm	Thigh	Wrist	Ankle
<b>12 Boys</b> cm (Inches)	76.2 (30)	64.8 (25 ½)	76.2 (30)	21.6 (8 ½)	43.5 (17 1/8)	14.6 (5 ¾)	20.3 (8)
<b>12 Girls</b> cm (Inches)	76.2 (30)	64.8 (25 ½)	81.3 (32)	21.6 (8 ½)	46.7 (18 ½)	14.6 (5 ¾)	20.3 (8)
<b>13 Boys</b> cm (Inches)	78.7 (31)	66 (26)	78.7 (31)	22.2 (8 ¾)	44.8 (17 5/8)	14.9 (5 7/8)	20.6 (8 1/8)
<b>13 Girls</b> cm (Inches)	78.7 (31)	66 (26)	83.8 (33)	22.2 (8 ¾)	47.6 (18 ¾)	14.9 (5 7/8)	20.6 (8 1/8)
<b>14 Boys</b> cm (Inches)	81.3 (32)	67.3 (26 ½)	81.3 (32)	22.9 (9)	46 (18 1/8)	15.2 (6)	21 (8 ¼)
<b>14 Girls</b> cm (Inches)	81.3 (32)	67.3 (26 ½)	86.4 (34)	22.9 (9)	49.5 (19 ½)	15.2 (6)	21 (8 ¼)

**Note:** Measure the dimensions on the front of the garment. Lay garment, right side out, on a flat, horizontal surface. Smooth out wrinkles. Measure distances as specified below and multiply them by two. Measurements should be equal to or less than the maximum dimensions given in the standards.

- i. Chest – Measure distance from armpit to armpit (A to B) as in Diagram 1.
- ii. Waist – See Diagram 1. One-piece garment, measured at the narrowest location between armpits and crotch (C to D). Two-piece garment, measure width at both the bottom/sweep of the upper piece (C to D) and, as in Diagram 3, the top of the lower piece (C to D).
- iii. Wrist – Measure the width of the end of the sleeve (E to F), if intended to extend to the wrist, as in Diagram 1.
- iv. Upper Arm – Draw a straight line from waist/sweep D through arm pit B to G. Measure down the sleeve fold from G to H. Refer to table below for G to H distances for each size. Measure the upper arm of the garment (perpendicular to the fold) from H to I as shown in Diagram 1.
- v. Seat – Fold the front of the pants in half to find the bottom of the crotch at J as in Diagram 2. The crotch seam and inseam intersect at J. Mark point K on the crotch seam at 4 inches above and perpendicular to the bottom of the crotch. Unfold the garment as in Diagram 3. Measure the seat from L to M through K as shown.
- vi. Thigh – Measure from the bottom of the crotch (J) 1 inch down the inseam to N as in Diagram 2. Unfold the garment and measure the thigh from the inseam at N to O as shown in Diagram 3.
- vii. Ankle – Measure the width of the end of the leg (P to Q), if intended to extend to the ankle, as in Diagram 3.



**Distance from Shoulder (G) to (H) for Upper Arm Measurement for sizes 9 months through 6X**

9-12 mos	12-18 mos	18-24 mos	2	3	4	5	6	6X
5.8 cm (2 1/8")	6.6 cm (2 5/8")	7.4 cm (2 7/8")	7.4 cm (2 7/8")	8.1 cm (3 1/4")	8.8 cm (3 1/2")	9.5 cm (3 3/4")	10.3 cm (4")	11 cm (4 3/8")

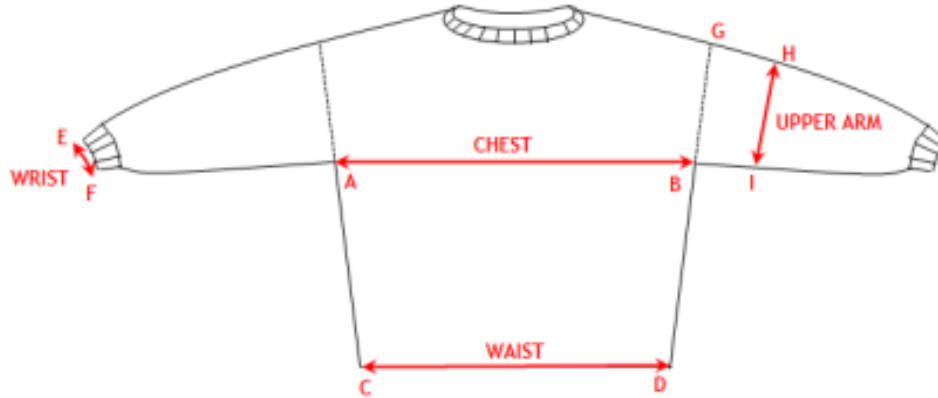


Diagram 1

**Distance from Shoulder (G) to (H) for Upper Arm Measurement for sizes 7 through 14**

7	8	9	10	11	12	13	14
11.4 cm (4 1/2")	11.7 cm (4 5/8")	11.9 cm (4 3/4")	12.5 cm (4 7/8")	12.8 cm (5")	13.1 cm (5 1/8")	13.7 cm (5 3/8")	14.2 cm (5 5/8")

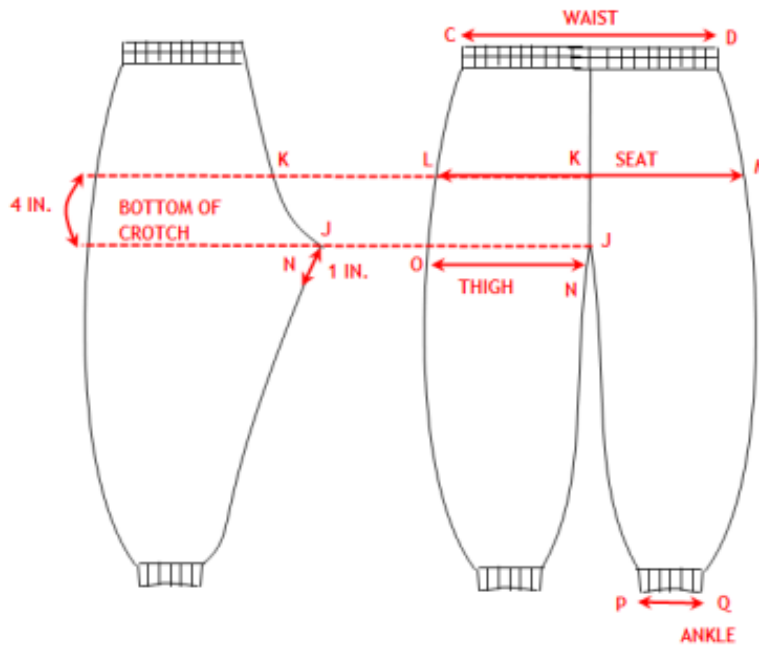


Diagram 2

Diagram 3

## 4.5 Flame Resistant Sleepwear – Flammability Testing

### A. Fabric Testing

A finished Fabric Production Unit (FPU) may be up to 5,000 yards in length. As a Kohl's requirement, a single FPU cannot be a combination of different colors, prints and **patterns** of the same fabric regardless if they exhibit similar burn characteristics. Fabric testing requirements:

- i. All colorways, prints and patterns must be tested for performance and flammability per style or program.
- ii. The average char length of five (5) specimens shall not exceed 7.0 inches.
- iii. No individual specimen shall have a char length of 10.0 inches.
- iv. If the FPU is rejected/failed, a tightened sampling is required. Subsequent FPU's must have samples taken from the beginning, middle and end of the FPU.

It is the fabric mill and vendor's responsibility to make sure that the fabric they ship to the garment factory has met all **fabric performance and FPU test requirements as per 16 CFR 1615/1616**.

### B. Prototype Seam & Trim Testing

Required prototype seam and trim testing is carried out to assess the flammability at the pre-production stage.

- i. All trims, appliqué, prints, and seams must be tested for each style or program.
- ii. Seams that are 10 inches or longer are subject to testing.
- iii. The average char length of five (5) specimens shall not exceed 7.0 inches.
- iv. No more than two (2) of the fifteen (15) specimens shall have a char length of 10.0 inches.

Prior to the start of production, it is the garment factory and vendor's responsibility to make sure that the prototype seams and trims have met the above requirements as per 16 CFR 1615/1616.

### C. Production Garment Testing

Production garment testing is required and carried out to assess the flammability of garments representative of bulk production. A Garment Production Unit (GPU) means any quantity of finished garments up to 500 dozen/6000 units, which have a specific identity that remains unchanged throughout the unit except for size, trim, findings, color and print patterns. As a Kohl's requirement, a single Garment Production Unit (GPU) cannot be a combination of different colors, print patterns, trim and findings regardless if other garment characteristics are identical.

- i. The average char length of 5 specimens shall not exceed 7.0 inches.
- ii. No more than three (3) of the fifteen (15) specimens shall have a char length of 10.0 inches.
- iii. Should a GPU fail for flammability, the vendor must contact Kohl's – Product Integrity immediately for further directions. Retesting is not permitted without prior discussion with Kohl's-Product Integrity.

It is the garment factory and vendor's responsibility to select the appropriate FPU and assign the GPU# to create the corresponding Garment Product Unit. Prior to shipment, ALL GPU and garment performance tests must be completed and meet the above requirements as per 16 CFR 1615/1616, prior to garment shipment. It is the vendor's responsibility to make sure all tests are completed in a timely manner in order to avoid any garment delivery slide.

## 5. Labeling

All Kohl's Proprietary Brand children's sleepwear must comply with the following labeling and packaging guidelines. By law, all children's sleepwear garments, flame resistant and/or snug fitting, must be labeled stating the size of the garment in terms of age in months, or by child's size. If this label is not visible to the consumer when the garment is offered for sale at retail, the same information must appear legibly on the package of the garment (e.g. size 9-12 months or size 12). Alpha sizing is allowed only when accompanied by a corresponding numeric size (e.g. 4T).

**Note: Infant Apparel sized 9 months or smaller, intended for use by infants that meet all infant size exemption guidelines, do not require labeling associated with "Flame Resistant" or "Snug-Fit". They do however need to meet all FTC guidelines for proper labeling.**

**The actual labels addressed below must be submitted to the lab for label verification during garment performance testing.**

### 5.1 Flame Resistant Sleepwear

A. In addition to the permanent care/fiber label, the text "*Flame Resistant*" must be included on each piece of the garment when sold individually or as a set.

Front Back

100% POLYESTER EXCLUSIVE OF  DECORATION  FLAME RESISTANT  SIZE 2T  MADE IN CHINA RN # 12345  CARE ON REVERSE SIDE	MACHINE WASH WARM WITH LIKE COLORS ONLY NON-CHLORINE BLEACH WHEN NEEDED TUMBLE DRY LOW COOL IRON IF NEEDED DO NOT IRON DECORATION DO NOT USE FABRIC SOFTENER ON THIS PRODUCT
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B. Garment Product Unit Identification – **GPU ID is required on each piece of the garment sold individually or as a set.** Kohl's highly recommends to state the following:

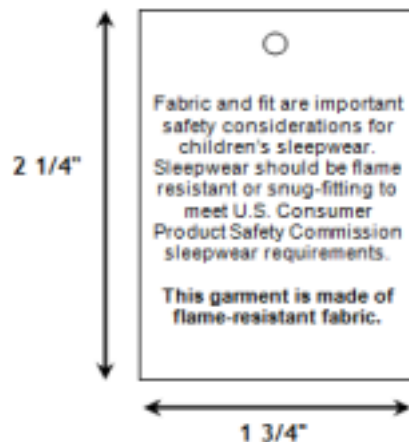
- Include the initials of the brand, "GP" for garment production, year, a unique 3 to 4 digit number, and a sequential number for every 500 doz/6000 units
- (I.e. JP-GP18-1234-1)
- Minimum size label 0.5" x 0.75" with unit id
- Information must be clear, conspicuous, legible and color that contrasts with background of the label
- GPU ID may be on a separate label, appear on the care/fiber label, or appear on the tracking label provided that the other information does not interfere with the GPU ID.
- Label is to be permanently attached to the garment
- Letter size of at least 1/6" (0.4 cm) in height
- Contrasting background on the TFPIA (general) label

Labeling Options:

Example: Jumping Beans, Fall 2018

Option 1	Option 2	Option 3
GPU # JB-GP18-1234-1	UPC# KOHL'S JB12345 98765 08/2018  GPU# JB-GP18- 1234-1	100%POLYESTER EXCLUSIVE OF DECORATION  FLAME RESISTANT  SIZE 2T  MADE IN CHINA
		RN # 12345  GPU# JB-GP18-1234-1 MACHINE WASH WARM WITH LIKE COLORS ONLY NON-CHLORINE BLEACH WHEN NEEDED TUMBLE DRY LOW COOL IRON IF NEEDED DO NOT IRON DECORATION DO NOT USE FABRIC SOFTENER ON THIS PRODUCT

**C. Packaging/Hangtags** – Per the CPSC, all children's flame resistant sleepwear must be accompanied by either packaging or a hangtag informing the customer the difference between flame resistant and snug fitting sleepwear.



**i. Format of Hangtag**

- Must measure 2 1/4" x 1 3/4".
- Font size must be 10 point Arial/Helvetica.
- Must have a white background and black lettering.
- One side of the hangtag must display only this message. The reverse side of the hangtag should be blank.
- Text must not be obscured by the hole provided for attaching the hangtag to the garment.
- Hangtag must be prominently displayed/visible on each individual garment or attached to the top, if sold as a set

## ii. Format of Packaging

- Package must have a label which has the same language that would appear on the hangtag.
- The label must have a text box that measures 2 ¼" x 1 ¾".
- Font size must be 10 point Arial/Helvetica.
- Must have a white background and black lettering.
- Package must be prominently, conspicuously, and legibly labeled with the required message.

## 5.2 Snug-Fitting Sleepwear

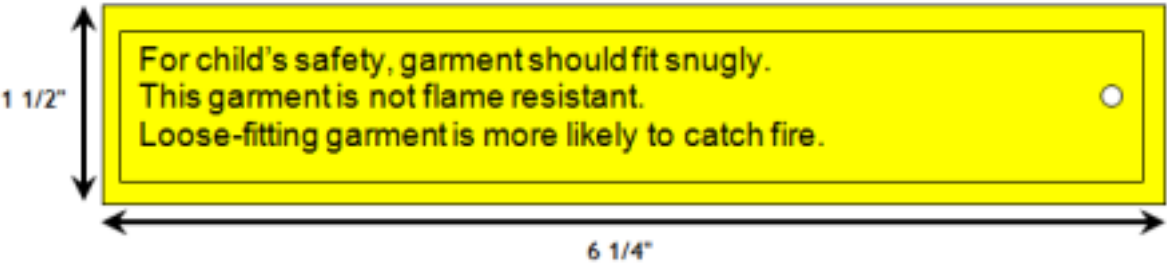
- A. In addition to the general permanent care label, the text "*Wear Snug Fitting, Not Flame Resistant*" should be included on each Snug-Fitting garment sold individually or as a set.
- Fit statement must appear on front of the sizing label directly below the size designation.
  - Font size must be a minimum of 5 point Sans Serif in **bold** capital letters and must be set apart from other label text by a line border.
  - Text must contrast with the background color of the label.
  - The label must not be covered by any other label or tag.

100% COTTON EXCLUSIVE OF DECORATION SIZE 2T  <b>WEAR SNUG FITTING NOT FLAME RESISTANT</b>  MADE IN CHINA RN # 12345  CARE ON REVERSE SIDE
MACHINE WASH WARM WITH LIKE COLORS ONLY NON-CHLORINE BLEACH WHEN NEEDED TUMBLE DRY LOW COOL IRON IF NEEDED DO NOT IRON DECORATION

B. Packaging/Hangtags – Per the CPSC, all children’s snug fitting garments must be accompanied by either packaging or a hangtag outlining the reason the customer should choose a snug size.

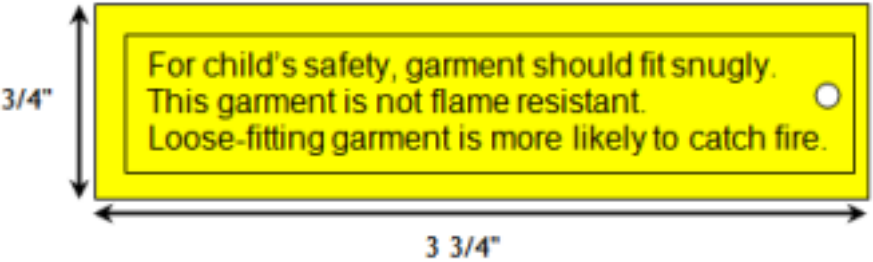
**i. Format of Hangtag**

- Must measure 1 ½” x 6 ¼”
- Text must be enclosed in a text box that measures 1” x 5 ¾”
- Font size must be 18 point Arial/Helvetica.
- Must have a yellow background and black lettering. The color yellow must meet the specifications for Standard Safety Yellow (Hue 5.0Y; Value/Chroma 8.0/12) as described in American National Standard ANSI Z535.1-1998, Safety Color Code.
- One side of the hangtag must display only this message. The reverse side of the hangtag should be blank.
- Text must not be obscured by the hole provided for attaching the hangtag to the garment.
- Hangtag must be prominently displayed/visible on the individual garment or on the top if sold as a set.



**ii. Format of Packaging (If the garment is sold in a package)**

- Package must have a label which has the same language that would appear on the hangtag.
- The label must have a text box that measures ¾” x 3 ¾”.
- Font size must be 11 point Arial/Helvetica.
- Must have a yellow background and black lettering. The color yellow must meet the specifications for Standard Safety Yellow (Hue 5.0Y; Value/Chroma 8.0/12) as described in American National Standard ANSI Z535.1-1998, Safety Color Code.
- Package must be prominently, conspicuously, and legibly labeled with the required message.



### **5.3 Tracking Label**

In addition to the required flammability labeling above, Kohl's requires all private and exclusive brand **children's products (sizes 0-20)** to contain a tracking label including the following information, in the following order:

**Kohl's  
Style No OR Style Name  
Kohl's Assigned Factory Number  
Date (Month/Year)**

It is important to note that the required Factory Number is Kohl's supplied factory identification number, not the Vendor Number. Factories producing Kohl's merchandise should be well aware of their Kohl's-assigned Factory Number, however, requests for confirmation of Factory Numbers can be directed to Kohl's Corporate Governance/Factory Compliance team – [Factory.Compliance@kohls.com](mailto:Factory.Compliance@kohls.com).

Kohl's generally expects this tracking label information to be included either product's UPC label or on a new sewn-in label attached beneath a care/content label or for those products without a care/content label, the tracking label will most likely be attached to a side seam.

**If a vendor's product includes one or more detachable parts or accessories (for example, but not limited to, night shirt sold with socks, jewelry, hair accessories, etc.), it is the vendor's responsibility to ensure all components are properly labeled or otherwise comply with the CPSIA's tracking label requirements.**

In the event that a vendor discovers challenges in attaching the required permanent tracking label to any particular product(s) or believes this type of labeling is not practical for a particular product, please contact the Kohl's Product Manager immediately with suggested corrective actions.

Please be advised that this summary of the CPSIA requirements is provided for informational purposes and should not be construed as legal advice on any specific requirement. As stated at the beginning of this summary, and as set forth in Kohl's Merchandise Purchase Order Terms and Conditions, Kohl's vendors must comply with any changes in existing laws or regulations, including – but not limited to – the legal requirements set forth in the CPSIA.

## **6. Quality Assurance Inspection**

**ALL Snug Fitting and Flame Resistant Sleepwear programs/styles must go through a Kohl's Quality Assurance Inspection and receive a Pass prior to shipment.**

### **A. Snug-fitting Sleepwear**

As part of a normal inspection request with a third party inspection service, the inspector will randomly pull and measure one size run representative of production across any/all colorways in the order. The Inspector will measure the 7 key body measurements for each size to confirm it is compliant as per Kohl's specs and within CPSC 16 CFR 1615/1616 standards. A REJECT inspection result for measurement would require a 100% measurement check by the factory. No override ability is allowed against Kohl's specified tolerances. For any questions contact Kohl's Quality Assurance at [Quality.Assurance@Kohls.com](mailto:Quality.Assurance@Kohls.com).

### **B. Flame Resistant Sleepwear**

Flame resistant sleepwear will go through the normal Kohl's Quality Assurance Inspection meeting all standards.

## 7. Record Keeping

Textile mills, garment manufacturers and vendors must maintain written and physical records (samples) of sleepwear garments, trims, and textiles in accordance with 16 CFR 1616/1615 for a minimum of 7 years. These records and samples should be available to Kohl's and Consumer Product Safety Commission (CPSC) upon request.

Flame Resistant & Snug-Fitting	
<ul style="list-style-type: none"><li>• Style Number/Class Number</li><li>• Garment design/specification/profile</li><li>• Fabric specification</li><li>• Product size range</li><li>• Number of units produced and sold</li><li>• Dates of production and sales</li><li>• Manufacturers PO# &amp; identification</li><li>• Customers PO#</li><li>• Yardage Yield</li><li>• Country of Production</li><li>• Care Instruction</li><li>• Garment Production Samples of each size</li><li>• Fabric and Garment Performance test reports</li></ul>	
Flame Resistant Sleepwear	Snug-Fitting Sleepwear
<ul style="list-style-type: none"><li>• Corresponding FPU to GPU#s</li><li>• Garment production and GPU#s</li><li>• Testing Conditions</li><li>• 16 CFR 1615/1616 flammability test reports</li><li>• Flammability test samples (must be labeled)<ul style="list-style-type: none"><li>- FPU, Prototype Seams, Trims, GPU garment, and burned/char remains</li></ul></li><li>• GPUs cannot be mixed for the purpose of testing.</li></ul>	<ul style="list-style-type: none"><li>• Pattern grading at 7 key body measurements</li><li>• 16 CFR 1610 flammability test reports and samples</li></ul>



# Appendix A – Children’s Sleepwear TRF

## Kohl's Department Store - CHILDREN'S SLEEPWEAR Test Request Form

Date \_\_\_\_\_

Please complete all sections of the test form. All information must be provided for the results to be delivered. Failure to provide will result in delay of test results to Vendor and Kohl's. Include one complete Test Request Form for each sample (style) being sent.

SERVICE REQUIRED

☐ Regular (5 Working Days)☐ Express (3 Working Days; 50% Surcharge)☐ Shortie (2-3 Working Days; 100% Surcharge)

☐ FLAME RESISTANT

☐ SNUG FITTING

☐ Initial Fabric Performance Pkg

☐ Additional Colorway Pkg

☐ RST/ST

☐ Initial Garment Part Pkg (include all components, i.e. belts, detachable jewelry)

Initial Rpt # \_\_\_\_\_

In the next page, provide an explanation how each product failure was corrected.

Fabric Rpt # \_\_\_\_\_

Flammability Testing 16 CFR 1615/1616

☐ Other \_\_\_\_\_

☐ Fabric Pkg

☐ Prototype Seam

FFP/FA \_\_\_\_\_

☐ Garment Pkg

☐ Trim

GRFA \_\_\_\_\_

PROTOCOL NUMBER: \_\_\_\_\_

PRODUCT FAILURE/RETEST: Provide explanation how EACH product failure was corrected/improved.

Previous Test Report # \_\_\_\_\_

Material Failure 1: \_\_\_\_\_

Correction 1: \_\_\_\_\_

Material Failure 2: \_\_\_\_\_

Correction 2: \_\_\_\_\_

Material Failure 3: \_\_\_\_\_

Correction 3: \_\_\_\_\_

Material Failure 4: \_\_\_\_\_

Correction 4: \_\_\_\_\_

Bill of Materials (B.O.M)					
Product Description:					
Style Numbers:					
NOTE: Bill of Materials (B.O.M) must accompany every PRODUCT being sent for testing.					
	Material / Component	Is Material Component made of Flammable Material? (Y/N)	Color	Preferred & Recommended Suppliers (If yes, provide the supplier name)	Non-Preferred Suppliers (provide the supplier name)
EX:	Jeans	NO	Blue	BOG	
Trims - i.e. Metal Hardware, zippers, fasteners etc.					
1					
2					
3					
4					
5					
6					
7					
Textiles/Decorative Thread/Logo - i.e. studs, logo, coated fabric etc.					
11					
12					
13					
14					
15					
16					

# Revision History

- **12/2018:**

- Added statements below:
  - 1.1 Snug-Fitting and Flame Resistant Sleepwear –
  - “Additionally, the use of identical print/pattern in different colorways cannot cross over from Snug-Fitting to Flame Resistant Sleepwear and vice versa.”
  - “The use of identical print/pattern in different colorways for sleepwear and general wearing apparel, or pulling out one section of an all over print/pattern from a non-sleepwear product to use on children’s sleepwear is also not allowed.”
  - 1.2 Snug-Fitting Sleepwear referenced in the Kohl’s Tech Design Pack
  - “A. No gowns are allowed in snug-fitting sleepwear.”
  - 2.1 The following items are exempt from meeting 16 CFR 1615/ 1616 /flammability standards –
    - “When the “exemption” applies for infant size ranges, a garment or web warning should not be applied.

- **10/2020:**

- 5. Labeling - Updated COO on example labeling from Hong Kong to China

- **05/2025:**

- Formatting Revisions
- Removed below information

- **12/2025**

- Updated Section **1.1 Design Considerations for both Snug-Fitting and Flame Resistant Sleepwear**
  - **The same prints and/or patterns may be used across both snug-fitting and flame-resistant sleepwear.**