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Information collection request title: Title V Maternal and Child Health Services Block Grant to States Program: Guidance and Forms for the Title V Application/Annual Report OMB No. 0915-0172-Revision.

The United States Lactation Consultant Association (USLCA) is a non-profit membership organization comprised of lactation consultants, nurses, physicians, dietitians, peer counselors, nutritionists, public health providers, and related professionals. USLCA is pleased for the opportunity to respond to the Maternal and Child Health Bureau's (MCHB) call for public comments regarding the Title V Block Grant process.

Breastfeeding is a public health imperative, positively affecting more than 10% of the Healthy People 2020 objectives for the nation. Breastfeeding affects health outcomes across the lifespan for mother and baby and it is important that state MCH programs consider breastfeeding promotion and support across funding streams. USLCA wishes to offer the following recommendations to achieve this end:

A performance measure for exclusive breastfeeding at 3 months of age should be adopted

- **Change performance measure number 10 from “Percent of infants who are ever breastfed” to “Percent of infants who are exclusively breastfed for 3 months.”**
Eleven states have already surpassed the Healthy People 2020 goal for breastfeeding initiation with many more coming very close. While breastfeeding initiation provides the foundation for lifelong health, *optimal outcomes are achieved only when breastfeeding duration and exclusivity are considered*. Six months of exclusive breastfeeding is considered optimal, but 3 months of exclusive breastfeeding provides a substantial boost to the immune system, helps populate the infant gut microbiome with flora that reduces inflammation, aids in gut closure, and contributes to reductions in both acute and chronic diseases and conditions. Lactation exerts its influence on maternal health with reduction in risks for type 2 diabetes, obesity, and reproductive cancers.

Access to an International Board Certified Lactation Consultant (IBCLC) should be available through performance measure number 9

- **Adequately insured children should have access to the level of lactation care and services needed to breastfeed exclusively for 6 months in performance measure 9.**
A large number of mothers with breastfeeding infants lack access to the level of support needed to overcome challenges for their infant to be exclusively breastfed for the first 6 months as recommended by the American Academy of Pediatrics. This results when third party payers reimburse licensed providers only. The IBCLC is not a license but a

certification denoting healthcare providers with the requisite expertise to provide lactation care and services throughout the childbearing continuum from prenatal through weaning and from routine to complex medical situations.

Title V programs and MCHB would benefit from having on staff an International Board Certified Lactation Consultant (IBCLC) who is responsible for assessing and assuring that comprehensive lactation care and services are available within Title V activities.

- It is important that the IBCLC expert be involved in MCHB's improvement efforts for maternal and child health. While breastfeeding is a cross-cutting issue that should be addressed by a variety of professionals and lay supporters, a great need exists for specially trained individuals versed in lactation and breastfeeding from the prenatal period through weaning. The IBCLC brings science-based knowledge of lactation and breastfeeding as well as clinical expertise in the administration of lactation care and services.

The starting point for a state's needs assessment as well as implementation of its performance objectives is to engage relevant stakeholders in the process. State identified needs should include measures to increase the exclusive breastfeeding rate at 3 months. States can collaborate with state chapters of USLCA and state breastfeeding coalitions to strengthen community partnerships and improve MCH outcomes. It is requested that MCHB incorporate breastfeeding and the IBCLC into relevant performance measures as well as structural and process measures to support collaboration, ensure technical assistance, and integrate best/promising practices.

Thank you for the opportunity to provide comments. USLCA looks forward to working with MCHB and Title V funded programs in the upcoming years.

Respectfully submitted,



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