Thank you for all you do to ensure women have access to quality, affordable health care. A sample letter follows. Be sure to individualize it so HHS gets a comprehensive picture of why IBCLCs are vital to the care of breastfeeding women and infants. Your letter needs to be brief as the portal allows only 2000 characters.

Copy the below message and past it here: <http://www.regulations.gov/#!submitComment;D=CMS-2012-0142-0001>

Please state that insurance companies must cover the services of the International Board Certified Lactation Consultant (IBCLC) in the maternal and newborn section of the Essential Health Benefits (EHB). IBCLCs are allied health professionals certified through a rigorous credentialing process who possess the requisite skills to manage common and complex lactation management issues. Too many breastfeeding mothers lack access to the level of care that they need, resulting in fragmented care deferred to providers who may not have the training or expertise to handle complex lactation situations. See <http://massbreastfeeding.org/landscape/> for a guide to lactation qualifications. This drives up the cost of and increases the number of health claims due to increased infant illnesses and conditions preventable by successful breastfeeding. Services of IBCLCs result lower health care costs to insurers. The U.S. Surgeon General included in the 2011 *Call to Action to Support Breastfeeding*, the specific recommendation to provide reimbursement for IBCLCs independent of their having other professional certification or licensure. The Centers for Disease Control and Prevention use the IBCLC as a metric in its determination of the adequacy of breastfeeding support in its annual *Breastfeeding Report Card.*

State required benefits should include IBCLC services to improve the quality and value of the coverage that is available for EHB. Please include coverage of IBCLC services under Sec. 147.150 Coverage of essential health benefits. Beginning in 2014, all non-grandfathered health insurance coverage in the individual and small group markets, Medicaid benchmark and benchmark-equivalent plans, and Basic Health Programs (if applicable) will be required to cover essential health benefits. I strongly encourage Secretary Sebelius to expressly declare in the text of the final rule that health plans specifically state that coverage will be available for IBCLC services