



July 7, 2015

**TRICARE: Delivery of lactation services provided by International Board Certified Lactation Consultants.**

Lt. Gen. (Dr.) Douglas J. Robb  
7700 Arlington Blvd, Suite 5101  
Falls Church, VA 22042

The United States Lactation Consultant Association (USLCA) entreats TRICARE to offer the services provided by *International Board Certified Lactation Consultants (IBCLCs)* to their pregnant and breastfeeding beneficiaries enacted under section 1079(a) of title 10, United States Code, "Availability of Breastfeeding Support, Supplies and Counseling under the TRICARE Program".

The USLCA is a non-profit organization established to advocate for improved access to lactation care in the United States. We urge TRICARE to recognize lactation consultant services as a covered service when rendered by IBCLCs.

The provision of this cost-effective preventive service will aid TRICARE to achieve the health benefits and reduction in costs associated with expert breastfeeding support. Specifically, inclusion of and reimbursement for the services of lactation consultants can improve breastfeeding outcomes and contribute to improved mother and infant health outcomes (see attached Containing Health Care Costs)

Evidence shows that several practices in intrapartum medical care settings can significantly affect breastfeeding rates and the duration of breastfeeding exclusivity among women.

According to the Surgeon General, "International Board Certified Lactation Consultants (IBCLCs) are the only health care professionals certified in lactation care. They have specific clinical expertise and training in the clinical management of complex problems with lactation (attached Professional Standards of IBCLCs)."

- IBCLCs adhere to the IBLCE Code of Professional Conduct and practice within the Scope of Practice for IBCLCs.
- IBCLCs are required to keep their knowledge and skills current. They must recertify every 5 years through continuing education or re-examination.
- IBCLCs function and contribute as members of the health care team and make appropriate referrals to other health care professionals and community support resources.
- IBCLCs possess the skills, knowledge and attitudes to provide comprehensive lactation and breastfeeding care and education in routine and special circumstances across the chronological spectrum of pre-conception to early childhood.



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The U.S. Surgeon General's Call to Action to Support Breastfeeding (see attached) recommended insurance coverage for International Board Certified Lactation Consultant services in its list of actions.

The USLCA is aware of numerous other levels and types of breastfeeding support providers which all contribute to breastfeeding success, however, the IBCLC has the most extensive training among them. The evidence collected over 30 years of care offered by IBCLCs consistently demonstrates improved breastfeeding outcomes for all women they serve.

USLCA notes that Aetna, a nationwide insurer offering private insurance and Medicaid managed care plans, implemented an excellent model for insurers, which became effective in August of 2012. Specifically, Aetna has made provision for credentialing of IBCLCs across the country. In addition, Aetna defined the billing and diagnosis codes necessary for their benefit holders to obtain reimbursement for lactation services. We believe that insurance plans throughout the country can and should follow Aetna's lead.

In conclusion, the USLCA urges TRICARE to recognize lactation consultant services as a covered service when rendered by International Board Certified Lactation Consultants (IBCLCs). We have enclosed several informative documents for your reference as you consider our recommendation.

We look forward to working with you to ensure that dependents and women serving in the military and their infants are able to reap the full health and economic benefits associated with integrating International Board Certified Lactation Consultant (IBCLC) services as the standard for TRICARE plan benefits.

Sincerely,

A handwritten signature in black ink that reads 'Alisa Saunders'.

Alisa Saunders, RN, IBCLC, RLC  
President  
United States Lactation Consultant Association

*Attachments:*

*Containing Health Care Costs, 3rd edition*

<http://uslca.org/wp-content/uploads/2013/02/Containing-Health-Care-Costs-3rd-edition-7-2014.pdf>

*IBLCE Professional Standards*

<http://www.iblce.org/professional-standards>

*Surgeon General's Call to Action to Support Breastfeeding*

<http://www.cdc.gov/breastfeeding/promotion/calltoaction.htm>