



United States Breastfeeding
COMMITTEE
PROTECTING • PROMOTING • SUPPORTING

Comments on HHS Draft Strategic Plan 2010-2015
August 14, 2010

To Whom It May Concern:

The United States Breastfeeding Committee is pleased to see such a comprehensive strategic plan for the health of our nation. However, we wish to urge HHS to include breastfeeding promotion and support in each of the five goals. Most of the objectives would be strengthened by plans to provide lactation care and services in federally funded programs and locations, by supporting evidence-based strategies of maternity care, by assuring that all health care professionals met the core breastfeeding competencies promulgated by the United States Breastfeeding Committee, by including breastfeeding support as part of emergency preparedness, and by reimbursement for breastfeeding care and services. Coverage of lactation care and services needs to be uniform across states in order to reduce health disparities.

Another specific area in which to support breastfeeding is Goal 2, Objective C, addressing food and medical product safety. The efficacy and safety of new ingredients added to infant formula have not been established. There is no oversight or monitoring that shows these ingredients are effective or necessary to the health of infants. These formulas are often marketed as equivalent to breast milk, and ultimately undermine optimal infant feeding.

Many of these goals address health problems after they have occurred, while breastfeeding is the original health preventive intervention throughout the life course and the foundation of good health. The financial burden to the health care system and the country of not breastfeeding exceeds \$13 billion each year. By increasing breastfeeding initiation and, more importantly, exclusive breastfeeding for six months, we will realize significant health and economic benefits that are associated with breastfeeding.

HHS has a strong history of promoting and supporting breastfeeding and would continue this important intervention if the strategic plan identified breastfeeding specifically in its objectives. Since many state health departments identify and prioritize their own work plans based on the model from HHS, it is especially important that lactation care and services be recommended and reimbursed, that evidence-based maternity care be supported to improve health care quality, and that training of health care providers includes breastfeeding skills and competencies.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Robin W. Stanton'. The signature is fluid and cursive, with the first name 'Robin' being the most prominent.

Robin W. Stanton, MA, RD, LD

Chair

United States Breastfeeding Committee