

3216

14-542-56

Graeff, Melissa

From: Katie Kenyon <KKenyon@delcofoundation.org>
Sent: Tuesday, November 13, 2018 1:27 PM
To: PW, CC Reg Changes
Cc: Shanna Williams; Kay Hoover
Subject: Proposed Changes to Child Care Regulations - Meals for Infants
Attachments: PA Childcare Regulations - Provision of Human Milk in Childcare Settings.docx

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Dear Ms. Ferguson,

I am submitting public comment for proposed changes to the Current Child Care Regulations on behalf of the Delaware County Breastfeeding Coalition based out of Chester, PA. The Coalition is a subcommittee of a collective impact initiative called Baby's 1st Project focused on improving birth outcomes and reducing disparities in Infant Mortality and Morbidity Rates (IMMR). Breastfeeding became an early focus in our work as we came to understand that pre-term birth is one of the key drivers of IMMR disparities in our county and human milk is life-saving to those smallest babies. So much so, that our area birthing hospitals now provide donor milk to premature babies when mothers are unable to breastfeed. In addition, breastmilk is beneficial for all babies and breastfeeding improves both maternal and child health across the life-span.

Our coalition submitted public comment in May via an OCDEL Town Hall Meeting in Philadelphia but we are re-submitting them for inclusion in this public comment period for Child Care Regulations. It is our belief that this is an opportunity for systemic changes that can impact the support that breastfeeding mothers receive across the state when their infants enter child care settings. Standards that support the safe handling and storage of breastmilk as well as increase the knowledge of providers can encourage breastfeeding for longer periods of time which impacts the health of mothers and babies. According to the CDC, currently only 7 states include information about human milk in their Child Care Regulation Standards – we believe Pennsylvania belongs among those states who incorporate these standards early.

The attached comments include suggested standards gleaned from other state regulations and best practices identified by expert Lactation Consultants in the field – including Nikki Lee, IBCLC, who teaches PQAS approved classes through the Philadelphia Dept. of Health to childcare centers. These standards address; support for breastfeeding mothers, safe handling of human milk in childcare settings, training for childcare staff and workplace accommodations for Child Care program staff who may also be breastfeeding. The standards should be included in Chapters 20, 3270, 3280 and 3290. Numbers, sections and subsections are included on the attached document.

Please reach out if there are any questions or comments regarding this input.

The Chair of this Coalition is Shanna Williams, LCSW, Med, Director of Social Work Counseling Services and Clinical Assistant Professor Widener University Center for Social Work Education.

Kay Hoover, IBCLC and Lactation Consultant at Riddle Hospital, is the Chair of our Public Policy Committee.

With warm regards,

Katie

Katie Kenyon
 Community Engagement Director
 The Foundation for Delaware County

*Infants and Toddlers enrolled in Childcare Programs may be fed in one of three ways at home: by breastfeeding or by bottle-feeding with breastmilk or with infant formula.

*Childcare Program staff should be knowledgeable and supportive of all infant and toddler feeding styles.

*Breastfeeding education for childcare staff will not add to their workloads. The education is about creating a breastfeeding friendly environment, and the safe bottle-feeding and storage of breastmilk.

Meals for Infants

§3270.166

Provision of human milk for breastfeeding babies:

Breastmilk is the best source of milk for infants and supports optimal health for mothers and babies, reduces Infant and Maternal mortality and morbidity Rates and supports the Healthy People 2020 Objectives for Breastfeeding. Childcare program staff who are educated can support Mothers who enroll infants and toddlers in Childcare Programs to sustain breastfeeding to meet Healthy People 2020 Goals for Breastfeeding.

§3270.166.1 Train all staff on the benefits of breastfeeding, how to support breastfeeding families, and how to safely feed and store breastmilk. Inform families and staff that the childcare program is committed to and supportive of breastfeeding. Job descriptions and performance evaluations shall include a review of breastfeeding support activities. All employees who are breastfeeding will be provided with a flexible schedule for breastfeeding or pumping. Centers shall keep a current copy of the Pennsylvania Breastfeeding Resource Guide available as a resource for parents.

§3270.166.2 Parents of each enrolled infant shall provide written feeding instructions specifying the child's primary source of nutrition (breast milk, infant formula, or both) and feeding schedule. The instructions shall be updated as the child's diet changes. All bottles of breastmilk should be labeled with the child's complete name and date. Childcare programs shall provide a clean and private place for a mother to either breastfeed or to pump. Staff shall provide parents with a written report on the child's nutrition for the day.

§3270.166.3 Staff shall be trained on the proper handling, storage, preparation of human milk and on paced bottle-feeding methods. All infants should be fed when they indicate hunger. Heating human milk in a microwave is prohibited. As a perishable food, breastmilk must be refrigerated. It is not necessary to wear gloves when feeding or handling human milk. Breastmilk can be stored in the facility refrigerators and freezers, like other foods. Infants shall not be served formula or breast milk of another infant. Parents should be notified immediately in the event this occurs. Used portions of breast milk that were offered to the infant shall be immediately refrigerated and discarded after 1 hour. The length of time a center or day care home may keep refrigerated bottles of fresh breastmilk is 72 hours.

Solid food should not be introduced before infants are 5 months of age unless indicated by a physician or requested by parents. Infant formula should not be fed to breastfed infants without a parent's permission. While being bottle-fed, all babies must be held and should be fed in a paced style. Bottles and nipples that will be reused must be thoroughly washed between uses.

A physician's note is not required to give human milk to a toddler.

§3270.166.4 Breastfeeding mothers including employees shall be provided a sanitary, and private if desired, place that is not a toilet stall to breastfeed their child or express milk. This area shall provide an electrical outlet, comfortable chair and nearby access to running water.