

Graeff, Melissa

14-542-41

From: Kay Hoover <kayhoover@verizon.net>
Sent: Friday, November 9, 2018 10:35 PM
To: Nellie Wiancko; Patricia Keister; Lauren Lowe; Judy Gutowski; Kathie Wagner; Ruth Wilf; Ruth Wilf; Spencer Jeanne; PW, CC Reg Changes
Subject: Child Care Regulations
Attachments: PA Child Care Facility Regulations Nov 2018.docx

As chair of the Pennsylvania Breastfeeding Coalition I am submitting our proposed additions to the Child Care Facility Regulations. The document is attached. As breastfeeding leaders in the state, we would like to volunteer our services to write a small booklet for your employees about the education needed to support breastfeeding. And/or, we could create a curriculum to include in the education of your staff members. We could also provide trainers.

Please let us know how we could assist you in implementing our proposed additions.

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Kay Hoover
Lactation Consultant
kay@hoover.net
Chair of the Pennsylvania Breastfeeding Coalition

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The child care facility regulations under 55 Pa. Code Chapters 3270, 3280 and 3290

*Infants and toddlers enrolled in childcare programs may be fed in one of three ways at home: by breastfeeding or by bottle-feeding with human milk 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 human milk.

Nutrition

Meals for Infants

§3280.166

§3290.166

§3280.166.1 **Provision of human milk for breastfeeding babies:**

Human milk is the best source of milk for infants and supports optimal health for mothers and babies, reduces infant and maternal mortality and morbidity and supports the Healthy People 2020 objectives. Childcare program staff can support mothers who enroll infants and toddlers in childcare programs to sustain breastfeeding after returning to work.

§3280.166.2 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 human milk 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.

§3280.166.3 Staff shall be trained on the proper handling, storage, and 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, human milk must be refrigerated. It is not necessary to wear gloves when feeding or handling human milk. Human milk can be stored in the facility's 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 human milk that were offered to the infant shall be immediately refrigerated and discarded after 1 hour. The length of time a childcare center or day care home may keep refrigerated bottles of fresh human milk is 72 hours, although research shows milk is safe for longer.

Solid food should not be introduced before infants are 5 months of age unless indicated by a physician or requested by parents, knowing that the American Academy of Pediatrics recommends exclusive breastfeeding for about 6 months. Infant formula should not be fed to

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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.

§3280.166.4 Breastfeeding mothers including employees shall be provided a private, if desired, place that is not a toilet stall to breastfeed their children or express milk. This area shall provide an electrical outlet, comfortable chair and nearby access to running water.

Age and Training

§3270.31

§3280.31

§3290.31

Train all staff on the benefits of breastfeeding, how to support breastfeeding families, and how to safely feed and store human milk. 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 local breastfeeding resources for parents contained in the Pennsylvania Breastfeeding Resource Guide available on the Department of Health website.

Tamula Ferguson

Bureau of Certification Services

The Office of Child Development and Early Learning, 333 Market Street, 6th Floor, Harrisburg, PA 17105

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Public comment

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