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From: Demirci, Jill Radtke <jvr5@pitt.edu>
Sent: Monday, November 12, 2018 4:53 PM
To: PW, CC Reg Changes
Cc: Debra Bogen
Subject: Proposed Changes to the Child Care Regulations at 55 Pa. Code, Chapters 3270, 3280 and 3290

On behalf of Dr. Debra Bogen (pediatrician, breastfeeding researcher) and myself (board certified lactation consultant, breastfeeding researcher), we strongly support the "Provision of human milk for breastfeeding babies" additions suggested by Kay Hoover to the "Meals for Infants" and "Age and Training" sections as follows, with one exception, in bold, red text below:

Nutrition

Meals for Infants

§3280.166
 §3290.166

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§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 an infant who is not considered medically-fragile or immunocompromised may be re-fed for up to 2 hours after the original feeding (discard after 2 hours), without need for refrigeration during this time period. 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 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.

As wasting of partially-fed human milk is one of the primary barriers to continued, exclusive breastfeeding in childcare centers, we urge the regulations include current CDC recommendations stating that used human milk (i.e., a partially fed bottle of human milk) may be re-fed to a healthy, full-term infant within a 2-hour time frame from when it was first fed to the infant, without need for refrigeration during that window.

The CDC recommendation may be found here:

https://www.cdc.gov/breastfeeding/recommendations/handling_breastmilk.htm (updated September 2018). The CDC recommendation is based on the Academy of Breastfeeding Medicine's clinical protocol revised in 2017

<https://www.liebertpub.com/doi/full/10.1089/bfm.2017.29047.aie>

Thank you for considering these important changes that will benefit breastfeeding mothers and their infants.

Sincerely,

Jill Demirci and Debra Bogen

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