



Background, Rationale & Template Comments for Breastfeeding Objectives within *Proposed Objectives for Healthy People 2030*

Background

The U.S. Department of Health and Human Services (HHS) has launched a public comment opportunity to seek feedback on the [proposed objectives for Healthy People 2030](#) (HP2030). The proposal includes one breastfeeding objective on exclusive breastfeeding at six months. This is a steep reduction from Healthy People 2020, which included eight breastfeeding objectives (including four sub-objectives).

Healthy People focuses on critical health promotion and disease prevention topics. Because stakeholders have indicated a desire for a more specific and targeted initiative in the next decade, Healthy People 2030 will be a streamlined set of national health objectives guiding the Nation in efforts to improve health. While this translates to a smaller set of objectives, Healthy People 2030 will continue to represent critical public health priorities by addressing the leading causes of morbidity and mortality and driving action at the national, state, and local levels. [Meeting materials](#) published from the Secretary's Advisory Committee document the process taken to reduce the number of objectives.

[Secretary's Advisory Committee discussion](#) has affirmed that public health issues that contribute to significant causes of disease, death, and disability will remain in Healthy People 2030 but explained that Healthy People 2030 is not designed solely for monitoring, which can be accomplished by other agencies and initiatives. To learn more about the history of breastfeeding and Healthy People, please refer to the U.S. Breastfeeding Committee background document titled "[Overview of Healthy People 2030 Objective Proposal and Public Comment Opportunity](#)."

The intention to significantly reduce the number of Healthy People objectives has been a top priority of the Secretary's Advisory Committee and Federal Interagency Workgroup. It is very unlikely that large numbers of objectives will be added to Healthy People 2030, especially since the Maternal, Infant, and Child Health section is already the second largest section in the HHS proposal.

The Breastfeeding Public Health Partners (BPHP) are coordinating and mobilizing stakeholders to support the continued inclusion of breastfeeding in the Healthy People initiative. BPHP released [draft](#)

[key messages](#), inviting feedback from individuals and organizations. This feedback was used to develop the below template comments and talking points to be distributed widely through the First Food Field in advance of the January 17, 2019 deadline to submit Healthy People 2030 comments.

Recommendation

It is the recommendation of BPHP to focus breastfeeding comments on preserving the current objective of six months of exclusive breastfeeding, while calling for an additional objective focused on maternity care practices, and another objective on breastfeeding rates at 12 months in order to clearly demonstrate the long term priorities of the breastfeeding field.

Rationale

In the last iteration of this process, Healthy People 2020 included sub-objectives on breastfeeding initiation (MICH-21.1), exclusive breastfeeding at 3 months (MICH-21.4), any breastfeeding at 6 months (MICH 21.2), exclusive breastfeeding at 6 months (MICH-21.5), and any breastfeeding at 12 months (MICH-21.3). All of the Healthy People 2020 breastfeeding rate targets have been reached except for any breastfeeding at 6 months and exclusive breastfeeding at 6 months.

For the current comment period, the top priority is maintaining the 6 months exclusive breastfeeding rate objective. This aligns with medical recommendations and is included in the current HP2030 objective proposal.

No topics in the HHS proposal include objectives that reflect more than one data point in time. However, it is important to continuously assess movement in duration of any breastfeeding up to 12 months to test the strength of interventions to increase breastfeeding rates, so BPHP is also including template comments to request an objective on increasing any breastfeeding at 12 months for those interested in underscoring the relevance of that data point in national surveillance efforts.

Healthy People 2020 also included process indicators (the policy, systems, and environmental supports that help achieve positive health outcomes), however the Healthy People 2030 objective proposal is focused primarily on outcome indicators. Healthy People 2020 breastfeeding objectives included several process indicators: Increase the proportion of employers that have worksite lactation support programs (MICH-22), Reduce the proportion of breastfed newborns who receive formula supplementation within the first 2 days of life (MICH-23), and Increase the proportion of live births that occur in facilities that provide recommended care for lactating mothers and their babies (MICH-24).

The workplace accommodation objective does not have a nationally representative data source and does not meet the requirements under the Healthy People framework, so BPHP did not include template comments related to this objective. Recommended care for MICH-24 is measured by the number of facilities that implement the *Ten Steps to Successful Breastfeeding* and receive Baby-Friendly designation. Since formula supplementation is addressed as part of the Ten Steps, the BPHP has only included template comments focused on the broader recommended care objective.

How to Submit Comments

For the Healthy People 2030 public comment opportunity, comments can be submitted on each of the proposed objectives and/or propose additional objectives for HP2030. Stakeholders can submit comments on as many objectives as they'd like, however comments must be submitted separately for each objective and are limited to 3,000 characters each.

To submit comments you will need to [register for a user account](#) on the Healthy People website or [log in](#) if you already have a user account.

To submit a comment in support of the proposed breastfeeding objective visit the [public comment webpage for MICH-2030-15: Increase the proportion of infants who are breastfed exclusively through 6 months](#). Enter your comment into the text box and select whether you are responding as an individual or as an organization. If you would like your comment to be listed anonymously, uncheck the box labeled "Please make my comments publicly viewable under my display name." Select "Submit Comment."

To submit a comment proposing a new objective, visit the [Propose a New Objective webpage](#). Complete the required fields by entering your comments into the text boxes and select whether you are responding as an individual or as an organization. If you would like your comment to be listed anonymously, uncheck the box labeled "Please make my comments publicly viewable under my display name." Select "Submit." To propose another new objective, return to the [Propose a New Objective webpage](#) and begin again.

Template Comments Expressing Support for 6 Months Exclusive Objective

I/we strongly support exclusive breastfeeding at 6 months as a Core Objective for Healthy People 2030. Breastfeeding is a proven primary prevention strategy, building a foundation for life-long health and well-being. The evidence for the value of breastfeeding to children's and women's health is scientific, solid, and continually being reaffirmed by new research. All major medical authorities recommend babies receive only human milk for their first six months, and continue to breastfeed (with the addition of appropriate complementary foods) for at least the first 1-2 years of life. Monumental health and economic gains can be achieved through policy and practice changes that ensure families have the support they need. If 90% of infants were breastfed according to medical recommendations, 3,340 deaths, \$3 billion in medical costs, and \$14.2 billion in costs of premature death would be prevented, annually!

While national, regional, state, tribal, and community organizations across sectors and across the U.S. have remained dedicated to helping our Nation meet and exceed the breastfeeding objectives since they were first established for Healthy People 2000, the impact of this work extends far beyond this particular objective. Supporting breastfeeding can contribute to reaching a multitude of the proposed HP2030 objectives: reducing the risk of obesity, type 1 and 2 diabetes, and asthma in children and reducing the risk of diabetes, cardiovascular disease, and breast and ovarian cancers in mothers.

Social, physical, and economic environments have a significant impact on the breastfeeding experience and there are a variety of evidence-based interventions to increase breastfeeding initiation, duration, and exclusivity, including efforts to improve maternity care practices, increase continuity of care, and support breastfeeding in the workplace and in public spaces. Over the past several decades, the Healthy People initiative has helped drive attention to breastfeeding support, and as a result, breastfeeding rates have increased, but stark racial and geographic disparities remain. At the same time, disparities in health outcomes between racial groups persist. Removing disparities in breastfeeding rates is a critical step for addressing and eliminating health inequities and achieving health equity. There is still significant work to do to close gaps in breastfeeding rates. To ensure continued momentum and progress toward creating a landscape of breastfeeding support across the United States, it is critical that Healthy People 2030 maintains a focus on breastfeeding.

Importantly, the Healthy People 2030 launch will take place close to the launch of the 2020-25 edition of the Dietary Guidelines for Americans, which for the first time, will include guidance for infants and toddlers (from birth to age 24 months), and women who are pregnant. It is critical that both the Healthy People and Dietary Guidelines demonstrate strong support for breastfeeding.

Template Comments to Propose Adding an Objective on Breastfeeding Duration

- **Topic Area:** Maternal, Infant, and Child Health
- **New Objective:** Increase the proportion of infants who are breastfed through 12 months
- **Objective Rationale:** All major medical authorities recommend that babies get no food or drink other than human milk for their first 6 months and continue to breastfeed for at least the first 1-2 years of life. While exclusive human milk feeding at 6 months is the gold standard, as recognized by the inclusion of this objective in the HHS proposal, it is also critical to assess the duration of any breastfeeding. Given the systemic barriers to breastfeeding that inequitably burden minority and underserved communities, it is important that we continuously assess movement in duration of any breastfeeding up to 12 months to test the strength of interventions to increase breastfeeding rates across the field. Alternatively, the 12 month breastfeeding measure could be included as a sub-objective of MICH-2030-15. The annual Centers for Disease Control and Prevention's National Immunization Survey provides a reliable, nationally representative data source to track progress on this proposed objective.
- **Proposed Baseline and Unit of Measure:** 35.9% (2015 births), Breastfeeding Rates among Infants
- **Proposed Data Source:** Centers for Disease Control and Prevention National Immunization Survey
- **Anticipated number of data points throughout the decade:** 10

Template Comments to Propose Adding an Objective on Maternity Care Practices to Support Breastfeeding

- **Topic Area:** Maternal, Infant, and Child Health

- **New Objective:** Increase the proportion of live births in facilities providing recommended care for lactating mothers and babies
- **Objective Rationale:** Healthy People 2020 included eight breastfeeding objectives (including four sub-objectives) reflecting breastfeeding behaviors as well as policy, systems, and environmental factors that impact breastfeeding families. I/we strongly urge the Secretary's Advisory Committee and Federal Interagency Workgroup to maintain Healthy People 2020 Objective MICH-24 to increase the proportion of live births that occur in facilities that provide recommended care for lactating mothers and their babies as a core objective in Healthy People 2030. The *Ten Steps to Successful Breastfeeding*, developed by the World Health Organization and UNICEF, have been shown to establish a strong start to the breastfeeding relationship—the first step toward reaching the HP2030 Core Objective (MICH-2030-15) to increase exclusive breastfeeding at 6 months. There is substantial evidence that implementing the Ten Steps increases breastfeeding initiation, exclusivity, and duration. Further, the racial disparities that plague our Nation's breastfeeding rates are not reflected in breastfeeding rates at discharge from hospitals that have implemented the *Ten Steps*. The biannual Centers for Disease Control and Prevention's Breastfeeding Report Card provides a reliable, nationally representative data source to track progress on this proposed objective's target. The Report Card includes state-specific data.
- **Proposed Baseline and Unit of Measure:** 26.1% (2018), Percentage of Live Births Occurring at Baby-Friendly Facilities
- **Proposed Data Source:** Baby-Friendly USA and National Center for Health Statistics
- **Anticipated number of data points throughout the decade:** 10