



800 I Street, N.W. • Washington, DC 20001-3710
Phone: (202) 777-APHA • Fax: (202) 777-2534
www.apha.org • comments@apha.org

Protect, Prevent, Live Well

August 29, 2011

Debra R. Whitford
Director, Supplemental Nutrition Programs Division
Food and Nutrition Service, USDA
3101 Park Center Drive, Room 250
Alexandria, VA 22302

RE: FR Document 2011-16289, June 29, 2011

Dear Ms. Whitford:

The American Public Health Association (APHA) appreciates the opportunity to provide comments on U.S. Department of Agriculture's (USDA) "Request for Public Comments for Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Local Agency Recognition of Exemplary Breastfeeding Support Practices" (Federal Register, Vol. 76, No. 125, Wednesday, June 29, 2011).

APHA is the oldest and most diverse organization of public health professionals in the world and has been working to improve public health since 1872. APHA represents a broad array of health providers, educators, environmentalists, policy-makers and health officials at all levels working both within and outside governmental organizations and educational institutions.

APHA commends USDA for reaching out to the public for recommendations regarding the new program to recognize exemplary WIC breastfeeding promotion and support activities. We are fully in support of the new program as established by the Section 231 of the Healthy, Hunger-Free Kids Act of 2010, Public Law 111-296. APHA believes that building a supportive environment for breastfeeding is an important public health goal. We have advocated strongly for breast feeding promotion through the multiple programs and agencies where public health professionals work. In 2007, APHA adopted policy 200714: [*A Call to Action on Breastfeeding: A Fundamental Public Health Issue*](#). This policy urges all maternal/child and comprehensive public health policies to include attention to breastfeeding protection, education, promotion and support; ensure collection of national data of comprehensive breastfeeding data, identifying the exclusive breastfeeding rate as a leading health indicator; and support legislation and programs that enable women to succeed in breastfeeding, including worksite lactation protection, access to skilled lactation care and services, including adequate funding to meet the Healthy People 2010/2020 goals.

The 2010 *Dietary Guidelines for Americans* acknowledge that initiation and maintenance of breast feeding during infancy can help prevent overweight and obesity throughout the life span.

As high rates of overweight and obesity in children and adults plague this country, more WIC agencies and clinics could play an important role in community efforts defining specific policies and programs, changing workplace and school environments, and recommending systemic approaches to advance increasing breastfeeding rates.

APHA strongly supported and worked for passage of the Healthy, Hunger-Free Kids Act of 2010. We are pleased that USDA has moved forward to consult with state and local agencies and the general public in implementing a program to recognize exemplary breastfeeding support practices in WIC. APHA's recommendations address criteria for evaluating exemplary practices related to WIC agency or clinic partnerships with other entities to promote and support breastfeeding including population-based initiatives.

Overall, the WIC program is highly successful in its mission to improve the health and food security and nutritional status of low-income pregnant women, new mothers, and infants and young children. The potential impact of WIC on breastfeeding is significant given that the program now serves over half of the mothers and infants in America. It is not only particularly timely and important for USDA to recognize those WIC agencies that have been able to successfully build a supportive breastfeeding environment, but also for USDA to share widely and visibly the best practices of those exemplary agencies with other WIC agencies, public health departments, pediatric societies, and other organizations. Many states and locales have put into place specific policies and have changed environments to enable WIC participants and other low-income women to breastfeed. Amplifying and rewarding the role of WIC agencies and clinics in those success stories will help communities across the nation increase breastfeeding.

APHA supports the comments submitted by the Association of State and Territorial Public Health Nutrition Directors and the National WIC Association. We agree that exemplary services should be evaluated using a broad set of criteria that include but do not focus exclusively on breastfeeding data. Recognition should be provided not just for success demonstrated by increases in breastfeeding initiation and duration, but also for innovation, community engagement, successful coalitions and partnerships, and for strides forward to meet the recognition criteria particularly in the face of significant barriers.

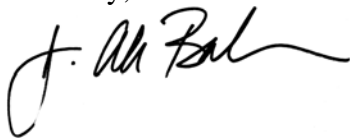
We underscore and offer a few points of emphasis on criteria for defining excellence in WIC agencies and clinics as it relates to "(3) The extent to which the agency or clinic has partnered with other entities to build a supportive breastfeeding environment for women participating in WIC" (page 38109). In particular, APHA encourages USDA to consider the following elements as criteria for defining excellence in WIC agencies or clinics:

- Collaboration and partnerships with community agencies, non-profits, businesses and other organizations such as breastfeeding coalitions, obesity prevention campaigns, and workplace wellness initiatives to reach existing and potential WIC participants with consistent and effective breastfeeding promotion and support.
- Participation in and initiation of efforts to encourage the adoption of policies by cities, hospitals, health care providers, employers, child care centers, and schools that remove barriers, provide incentives, and create conditions that help extend the duration of breastfeeding by low-income mothers.

- Leveraging available funds from other community organizations and foundations to expand and extend efforts to change the environment, advance policy initiatives, and achieve more exclusive breastfeeding for a longer time.
- Demonstrated success in using WIC surveillance data to evaluate and inform breastfeeding promotion strategies within the WIC clinic system and by other entities to improve the effectiveness of breastfeeding initiatives.

We appreciate the opportunity to offer suggestions for selection criteria for exemplary WIC agencies and clinics with an emphasis on the elements that encourage policy and environmental changes, collaboration, and overall systematic changes that will enable more WIC participants to achieve the benefits of breastfeeding.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Alan Baker". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

J. Alan Baker
Interim Executive Director