



2501 Aerial Center Parkway, Suite 103  
Morrisville, NC 27560  
Phone: 919.861.4543  
Fax: 919.459.2075  
[www.uslcaonline.org](http://www.uslcaonline.org)  
[info@uslcaonline.org](mailto:info@uslcaonline.org)

Comments on [60Day-09-0743]

CDC Monitoring of Breastfeeding-Related Maternity Care Practices in Intra-partum Care Facilities in the United States and Territories

(OMB Control No. 0920-0743, Exp.7/31.2009)-Revision-National Center for Chronic Disease Prevention and Health Promotion (NCCDPHP), Centers for Disease Control and Prevention (CDC).

From: Glenda Dickerson, RN, MS, IBCLC  
President USLCA  
April 2009

The United States Lactation Consultant Association (USLCA) is the professional association for lactation professionals in the United States. Thank you for the opportunity for our association to address the mPINC survey and its impact on the environment of care that surrounds a mother and infant during the first crucial days of breastfeeding.

The mPINC survey has provided an excellent beginning to a much needed process. One of the most important features of this survey rest in the score that is provided and the comparison of that score to other facilities based on location and size. The survey results provide valuable direction concerning specific opportunities for improvements in care. We recommend the following:

- The continuation of this process. Health care facilities are becoming more and more responsive to surveying and benchmarking as a mechanism for driving change in the care environment.
- The reference to Lactation Coordinator in the Structural & Organizational Aspects of Care Delivery section is amended to recommend that the International Board Certified Lactation Consultant (IBCLC) be identified as the ideal candidate for this position.
- A mechanism is developed to collect the desired information in a non-self reporting format.
- The information gleaned from this tool is made public upon request. Access to the details provided in this report would be a part of informed choice for mother's seeking appropriate and supportive maternal infant care.

Sincerely,

Glenda Dickerson, RN, MS, IBCLC  
President USLCA