

ASPHN Comments Submitted to US Department of Health and Human Services (HHS) on proposed objectives for Healthy People 2030

Previous public comments on the proposed Healthy People 2030 framework helped shape the vision, mission, foundational principles, plan of action, and overarching goals for Healthy People 2030. In this public comment period, HHS would like input on the proposed Core, Developmental, and Research objectives.

In response to stakeholder input, Healthy People 2030 will be a streamlined set of national health objectives guiding the nation's efforts to improve health. 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.

ASPHN Comments on Topic Area: Maternal, Infant, and Child Health

1. MICH-2030-15: Increase the proportion of infants who are breastfed exclusively through 6 months.

The Association of State Public Health Nutritionists (ASPHN), staunchly supports the inclusion of MICH-2030-15 as a core objective for Healthy People 2030. We along with other organizations, federal and state agencies, policymakers, and public officials, look to the Healthy People breastfeeding objectives for leadership in advancing evidence-based breastfeeding campaigns and initiatives.

Promoting and supporting breastfeeding exclusivity through 6 months closely aligns with the recommendations of all major medical authorities. Yes, breastfeeding rates and breastfeeding support have significantly increased. However, still less than 25% of infants are exclusively breastfed at 6 months of age. Furthermore, glaring racial and socio-economic disparities in breastfeeding rates are compounded by comparable disparities in health outcomes. By striving to eradicate disparities in breastfeeding rates, Healthy People would of course be taking a major step towards eliminating health inequities and achieving health equity.

Billions of U.S. healthcare dollars, currently being spent on preventable medical care and premature death, could be saved annually if infants were indeed breastfed according to medical recommendations. A compelling Healthy People 2030 breastfeeding objective such as MICH-2030-15 would underwrite corresponding HP2030 objectives: proposed to reduce the risk of obesity, type 1 and 2 diabetes, and asthma in children and lower the risk of diabetes, cardiovascular disease, and breast and ovarian cancers in mothers. To ensure continued impetus and advancement of overall maternal and child health initiatives here in the United States, it is critical that Healthy People 2030 maintain its robust focus on breastfeeding. Therefore, ASPHN unwaveringly champions the inclusion of MICH-2030-15 in the final version of Healthy People 2030.

2. Propose Adding New Objective: Increase the proportion of infants who are breastfed through 12 months

The Association of State Public Health Nutritionists (ASPHN) welcomes this opportunity to propose the inclusion of “*increasing the proportion of infants who are breastfed through 12 months*” as a core objective for Healthy People 2030. Even though breastfeeding exclusivity up to 6 months is considered the gold standard, it would be equally prudent for Healthy People 2030 to evaluate the duration of any breastfeeding.

It is imperative that Healthy People 2030 maintain a strong focus not only on breastfeeding exclusivity; but also on the social, physical, and economic environments (such as the health care systems, workplaces, schools, and national, state, and tribal legislation) which have a prevailing impact on breastfeeding outcomes. In lieu of the noted barriers to breastfeeding which plague minority and underserved communities, Healthy People 2030 must endeavor to advance inroads in duration of any breastfeeding up to 12 months in order to test the strength of interventions and increase breastfeeding rates across the field.

A 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. ASPHN vigorously recommends the inclusion of an objective *to increase the proportion of infants who are breastfed through 12 months* in the final version of Healthy People 2030.

- **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
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3. **Propose Adding New Objective:** Increase the proportion of live births in facilities providing recommended care for lactating mothers and babies

The Association of State Public Health Nutritionists (ASPHN) welcomes the opportunity to encourage the Secretary's Advisory Committee and Federal Interagency Workgroup to keep the Healthy People 2020 Objective MICH-24, which is 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. Starting with Healthy People 2000, every subsequent iteration of the Maternal, Infant, and Child Health section has taken into account breastfeeding behaviors as well as policy, systems, and environmental factors that impact breastfeeding families.

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. Significant health and economic gains can be achieved through policy and practice changes, based on Healthy People 2030 objectives that ensure families most at risk have the support they need to reach their personal breastfeeding goals.

Although the *Ten Steps to Successful Breastfeeding*, have been shown to establish a strong start to the breastfeeding relationship; the racial disparities that beleaguer America's breastfeeding rates are not reflected in breastfeeding rates at discharge from hospitals that have implemented the *Ten Steps*. However, the biannual Centers for Disease Control and Prevention's Breastfeeding Report Card, along with Baby-Friendly USA and National Center for Health Statistics, would be reliable sources of nationally representative data to track progress on this proposed objective's target. Therefore, ASPHN strongly recommends the inclusion of Healthy People 2020 objective MICH-24: *to increase the proportion of live births in facilities providing recommended care for lactating mothers and babies* in the final version of Healthy People 2030.

- **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

ASPHN Comments on Topic Area: NWS (Nutrition and Weight Status)

1. The Association of State Public Health Nutritionists (ASPHN), staunchly supports the inclusion of objective NWS-2030-09 as a core objective for Healthy People 2030. We along with other organizations, federal and state agencies, policymakers, and public officials, look to the Healthy People objectives for leadership in advancing evidence-based public health wellness campaigns and initiatives. Promoting and supporting the reduced consumption of added sugars in the population aged 2 years and older aligns with the recommendations of all major medical authorities. Drawing on relevant evidence related to sugar-sweetened beverage consumption and its role in both child and adult obesity, Type 2 diabetes, and weight gain; Healthy People 2030 would be engendering a notable step towards eliminating health inequities, achieving health equity, improving the health of all Americans, and saving billions of U. S. healthcare dollars. Therefore, ASPHN unwaveringly champions the inclusion of NWS-2030-09 in the final version of Healthy People 2030.
2. The Association of State Public Health Nutritionists (ASPHN) welcomes this opportunity to propose the inclusion of an objective on increasing the number of individuals and families with access to fruits and vegetables. Glaring racial and socio-economic disparities in both access and consumption of fruits and vegetables are compounded by comparable disparities in health outcomes. As noted by many studies, a diet rich in vegetables and fruits can lower blood pressure, reduce the risk of heart disease and stroke, prevent some types of cancer, lower risk of eye and digestive problems, and have a positive effect upon blood sugar, which can help keep appetite in check. Increased vegetable and fruit consumption may even promote weight loss. Their low glycemic loads prevent blood sugar spikes that can increase hunger. Indicators:
 - Number of farmers markets per 100,000 residents

- Percentage of farmers markets accepting SNAP, WIC
 - State policy on food service guidelines
2. The Association of State Public Health Nutritionists (ASPHN) welcomes this opportunity to propose the inclusion of an objective to increase fruit and vegetable access for children. Glaring racial and socio-economic disparities in both access and consumption of fruits and vegetables are compounded by comparable disparities in health outcomes. As noted by many studies, a diet rich in vegetables and fruits can lower blood pressure, reduce the risk of heart disease and stroke, prevent some types of cancer, lower risk of eye and digestive problems, and have a positive effect upon blood sugar, which can help keep appetite in check. Increased vegetable and fruit consumption may even promote weight loss. Their low glycemic loads prevent blood sugar spikes that can increase hunger. Indicators:
- State ECE Licensing Regulations that Align with National Standards for Serving Fruits and Vegetables
 - State Farm to School or Farm to ECE Policy in Place
 - Percentage of School Districts Participating in Farm to School Programs
 - Percentage of Middle and High Schools Offering Salad Bars
3. The Association of State Public Health Nutritionists (ASPHN) welcomes this opportunity to propose the inclusion of an objective to increase food system support for fruits and vegetables. Glaring racial and socio-economic disparities in both access and consumption of fruits and vegetables are compounded by comparable disparities in health outcomes. Increasing food system support can help increase access and consumption of fruits and vegetables, particularly in at risk communities. Increased food system support would have a positive impact on reduced heart disease and stroke, prevent some types of cancer, lower blood sugar and obesity rates, which tend to plague poor and socio-economically strapped communities. Indicators:
- State Food Policy Council
 - Number of Local Food Policy Councils
 - Number of Food Hubs