



August 21, 2026

Emma Davis  
Organizational Unit, Division of Public Health  
Nebraska Department of Health and Human Services  
PO Box 95026  
Lincoln, NE 68509

Dear Ms. Davis,

Please accept this letter to serve as the Nebraska Breastfeeding Coalition's (NE BFC) Letter of Intent to initiate a review of the international board-certified lactation consultant profession under the Nebraska Credentialing Review Program (LB407).

NE BFC is a non-profit led by lactation support professionals from across Nebraska who are working to advance the health of Nebraska by making breastfeeding the norm through education, advocacy, and collaboration. NE BFC proposes that International Board-Certified Lactation Consultants (IBCLCs) be reviewed and considered eligible for licensure in Nebraska.

IBCLCs are skilled health professionals who work within a licensed health care team to provide clinical care to new mothers and babies in accordance with a scope of practice and clinical competencies dictated by the International Board of Lactation Consultant Examiners and the IBCLC Commission. Clinical lactation care is the evidence-based, professional application of scientific principles to assess, determine, and recommend interventions for complex human lactation issues. The IBCLC profession was founded in 1985 in response to the expressed need for a clinical lactation care provider.

We have included the required \$500 review fee with a mailed letter of intent and look forward to submitting a Credentialing Review application when notified by NE DHHS.

IBCLCs have worked outside the realm of licensed professionals since 1985. Over the past 10 years, five states have licensed IBCLCs, five states are introducing legislation in the coming year, and another 20 states are in the process of developing applications for licensure. IBCLCs are recognized by the Center for Medicare and Medicaid Services (CMS). However, only those IBCLCs who are licensed in another capacity (e.g. MD or RN) are currently eligible for reimbursement.

Public health and medical experts highly recommend the feeding of human milk. Research has shown that IBCLC clinical lactation services increase the duration and exclusivity of breastfeeding. The Women's Preventive Services Initiative (a cooperation between the American Academy of Obstetrics and Gynecology and the U.S. Department of Health and Human Services) identifies the IBCLC in the same category as physicians and nurses relative to clinical lactation care.

Conditions related to the status of maternal and infant health have brought the need for licensure forward. An increasing number of new mothers present with chronic illnesses and a high number of infants are born prematurely. Both situations impact breastfeeding and result in a need for risk-appropriate care, which protects the public by helping mothers to identify the level of care that meets their needs. It also integrates the profession into the licensed health care team which facilitates appropriate referrals to another licensed member of the team.

IBCLCs are the only perinatal health care provider, other than a Breastfeeding Medicine Specialist (an MD with advanced education in human lactation), who are prepared to provide risk appropriate care to mothers and infants facing complex lactation issues. IBCLCs complete 14 college level health science courses, 95 hours of specific lactation education, 300-1,000 supervised, hands-on clinical hours, and pass an independent criterion-referenced international exam. There are 10 baccalaureate or graduate level lactation education programs in the U.S., as well as independent educational programs that are specifically focused on the required IBCLC credentials.

IBCLCs are educated extensively in human lactation, including clinical assessment tools. The IBCLC Commission adheres to strict clinical competencies and a professional scope of practice. IBCLCs evaluate maternal and infant anatomy, milk production, and infant feeding/swallowing. They use existing evidence to develop, implement, and document clinical care to solve complex lactation challenges, and coordinate care with Pediatricians, Family Practice physicians, Obstetrician-Gynecologists, Certified Nurse Midwives, Speech Language Pathologists, Occupational Therapists, Physical Therapists, Dentists, and Mental Health Therapists.

NE BFC looks forward to working with the Nebraska Department of Health and Human Services, our colleagues in maternal and infant health, and other stakeholders on this important proposal. The health and safety of Nebraskans is best served by licensed professionals who can identify risks and provide appropriate lactation care within the perinatal health care team.

Please feel free to route:

- Email questions/correspondence to Melanie and Ann (email addresses below),
- Written correspondence to the Nebraska Breastfeeding Coalition, c/o Health Partners Initiative (mailing address below).

Sincerely,



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c/o Health Partners Initiative  
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