To Whom It May Concern:

As a healthcare clinician, I am writing to the Ohio Department of Medicaid to urge consistency with the Ohio Administrative Code, other payers and The Ohio State University who offer direct access to Lactation Consultants. Lactation Consultant is defined by the [Ohio Administrative Code, Section 3701-7-01](http://codes.ohio.gov/oac/3701-7) as an International Board Certified Lactation Consultant (IBCLC).

This is an especially important issue as IBCLC was not included in the COVID-19 State of Emergency [telehealth guidelines](https://medicaid.ohio.gov/Portals/0/Providers/COVID19/TelehealthBillingGuidelinesDuringCOVID-19StateofEmergency04132020.pdf?ver=2020-04-13-165849-963) which incorrectly defined Lactation Consultant care as "lactation counseling provided by a dietitian." IBCLC care spans preconception to weaning, has been shown to improve breastfeeding rates among low income women, and saves Medicaid systems money. An option to access it should not be limited by one’s socioeconomic status or insurance, and is important for the duration of breastfeeding as established by the Affordable Care Act.

ODM has a chance to create a research based and cost-effective model for Lactation Consultant care that improves maternal and infant health outcomes. A rule change to include IBCLC as a provider option for ODM beneficiaries is needed in any Maternal and Infant Health Initiative policy update. Prioritizing this for Medicaid beneficiaries is a preventive measure aligned with ongoing executive priorities to reduce infant and maternal mortality. I urge this credential to be added as an ODM provider, and for policy makers to engage with clinicians providing this care so that the policy details efficiently connect beneficiaries with Lactation Consultants.

Thank you,