

January 10, 2021

Attention: CDC Desk Officer Office of Management and Budget 725 17th Street NW Washington, DC 20503

Re: Feeding My Baby and Me: Infant Feeding Practices Study III—National Center for Chronic Disease Prevention and Health Promotion (NCCDPHP), Centers for Disease Control and Prevention (CDC)

Dear CDC Desk Officer:

On behalf of 1,000 Days, I write to voice our support for CDC's proposed data collection project, "Feeding My Baby and Me: Infant Feeding Practices Study III" (FMB&M-IFPS III). 1,000 Days, an initiative of FHI Solutions, works to ensure women and children have the healthiest 1,000 days from pregnancy to the child's second birthday.

The first 1,000 days is a period of both tremendous potential and enormous vulnerability. During this time, a child's brain undergoes rapid growth and development, and the foundations for lifelong health are built. The nutrition a mother and her child receive in the 1,000-day window has a profound impact on their future health and well-being, shaping the child's ability to grow, learn, and thrive. Feeding behaviors during early childhood are also critical for the development of food preferences and eating habits that carry forward into adulthood.

Despite the importance of nutrition in the first 1,000 days, there are limited data available to track early feeding practices and health in the United States. In fact, more than two dozen federal agencies recently voiced their need for nationally-representative data on diet and health during pregnancy and the first two years of life.¹ Additionally, the 2020 Dietary Guidelines Advisory Committee called for more robust data to assess food and nutrient intakes and health status for women and young children. In particular, "large datasets, especially those that follow participants longitudinally, and in particular link children with siblings and parents, would be very useful" to examine the relationship between early dietary patterns and health outcomes.²

<sup>&</sup>lt;sup>1</sup> "New Ventures to Study Infants and Young Children through National Survey," 2018. https://health.gov/news-archive/blog/2018/07/new-ventures-to-study-infants-and-young-children-through-national-survey/

<sup>&</sup>lt;sup>2</sup> "Scientific Report of the 2020 Dietary Guidelines Advisory Committee," 2020. <a href="https://www.dietaryguidelines.gov/sites/default/files/2020-07/ScientificReport of the 2020DietaryGuidelinesAdvisoryCommittee first-print.pdf">https://www.dietaryguidelines.gov/sites/default/files/2020-07/ScientificReport of the 2020DietaryGuidelinesAdvisoryCommittee first-print.pdf</a>



FMB&M-IFPS III is designed to address these critical gaps in knowledge and to strengthen multiple agencies' efforts to promote optimal nutrition and health.<sup>3</sup> The proposed study would follow pregnant women and their new baby for two years, allowing for the collection of information about mothers' intentions, behaviors, feeding decisions, and practices throughout the 1,000-day window. The longitudinal study design, with data collection occurring at multiple time points, will allow for these patterns to be associated with child health outcomes through rigorous analyses. Ultimately, these additions to the scientific literature will enable the design of policies and programs that effectively improve nutrition during the first 1,000 days and promote maternal and child health. For example, the study findings would have the potential to guide CDC's efforts to support and promote breastfeeding<sup>4</sup> and may allow for the continued improvement of the WIC food package<sup>5</sup> and its breastfeeding support initiatives.<sup>6</sup>

FMB&M-IFPS III will have practical utility both within and beyond CDC and the federal government. We urge the Office of Management and Budget to approve this data collection project. Thank you for the opportunity to comment, and please do not hesitate to be in touch if you have further questions.

Sincerely,

Blythe K Thomas

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<sup>&</sup>lt;sup>3</sup> A Notice by the Centers for Disease Control and Prevention on 12/11/2020. https://www.federalregister.gov/documents/2020/12/11/2020-27321/agency-forms-undergoing-paperwork-reduction-act-review

<sup>&</sup>lt;sup>4</sup> CDC's Work to Support and Promote Breastfeeding. <a href="https://www.cdc.gov/breastfeeding/about-breastfeeding/what-is-cdc-doing.html">https://www.cdc.gov/breastfeeding/about-breastfeeding/what-is-cdc-doing.html</a>

<sup>&</sup>lt;sup>5</sup> "Review of WIC Food Packages: Improving Balance and Choice," 2017. https://www.fns.usda.gov/wic/review-wic-food-packages-improving-balance-and-choice

<sup>&</sup>lt;sup>6</sup> Breastfeeding is a Priority in the WIC Program. <a href="https://www.fns.usda.gov/wic/breastfeeding-priority-wic-program">https://www.fns.usda.gov/wic/breastfeeding-priority-wic-program</a>