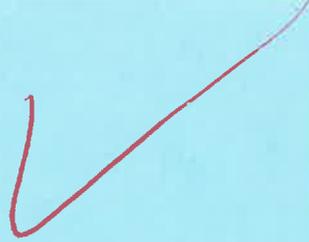


DEPARTMENT OF HEALTH AND HUMAN SERVICES  
OFFICE OF DIRECTOR



**ACTION REFERRAL**

TO <i>Hess</i>	DATE <i>2-11-13</i>
-------------------	------------------------

DIRECTOR'S USE ONLY	ACTION REQUESTED
1. LOG NUMBER <i>100-246</i>	<input type="checkbox"/> Prepare reply for the Director's signature DATE DUE _____
2. DATE SIGNED BY DIRECTOR <i>cc: Mr. Keck, Singleton</i>	<input checked="" type="checkbox"/> Prepare reply for appropriate signature DATE DUE <i>2-22-13</i>
	<input type="checkbox"/> FOIA <i>3-20-13</i> <i>Conference call with Exec. Director BFUSA, Jim Broderick, Vicky Donovan</i>
	<input type="checkbox"/> Necessary Action <i>Proposed changes to incident</i>

APPROVALS (Only when prepared for director's signature)	APPROVE	* DISAPPROVE (Note reason for disapproval and return to preparer.)	COMMENT
<i>Close</i>			<i>Refer 3-20-13</i>

*Communicate to BFUSA + 19 hospital*

Log Roy

CC: Singleton  
Director

Baby-Friendly USA  
The gold standard of care

January 30, 2013

Anthony E. Keck, Director  
South Carolina Department of Health and Human Services  
Post Office Box 8206  
Columbia, South Carolina 29202-8206

RECEIVED

FEB 04 2013

Department of Health & Human Services  
OFFICE OF THE DIRECTOR

Dear Mr. Keck,

Baby-Friendly USA, Inc. (BFUSA) is excited by the Department of Health and Human Services plans to incentivize hospitals in South Carolina to achieve the Baby-Friendly designation. Improving maternity care practices to support lactation is an extremely important public health goal. Financial rewards are a powerful motivation. Thank you for your efforts.

I would like to take this opportunity to offer feedback in hopes of improving South Carolina hospitals' chances for success in achieving the goal of Baby-Friendly designation. Implementing the Baby-Friendly Guidelines and Evaluation Criteria (<http://www.babyfriendlyusa.org/get-started/the-guidelines-evaluation-criteria>) is an enormous undertaking that requires a facility to conduct a thorough review of their current maternity care practices. It entails changes to policies and protocols, education of staff and patients, and up to 68 specific practice changes. It impacts the work of many disciplines and departments including: maternity, obstetrics, pediatrics, family practice, outpatient clinics, nursing, surgery, anesthesiology, dietary, pharmacy, purchasing, quality improvement and corporate compliance. In addition, forging relationships with external partners is needed to coordinate prenatal education and postpartum support as well as improve the community understanding of the importance of breastfeeding.

It is BFUSA's goal that facilities focus on sustainable practice changes, rather than simply achieving an award. Realistically, unless already well into the 4-D Pathway, initiating the process and implementing all of the practice changes in a sustainable manner within the timeframe outlined in "Race to the Date" is not possible. This timeline could position many South Carolina hospitals for failure. Facilities rushing to put practices in place and prematurely seeking BFUSA assessments typically do not pass. This results in additional staff time for BFUSA and frustration for the

NEW YORK

125 Wolf Road, Suite 311 · Albany, NY 12205  
PHONE: 518 · 621 · 7982 FAX: 518 · 621 · 7983

MASSACHUSETTS

449 Route 6A, PO Box 1015 · East Sandwich, MA 02537  
PHONE: 508 · 888 · 8092 FAX: 508 · 484 · 1716

facility. It is also worth noting that BFUSA must honor commitments to the hospitals that are already queued up for assessments this summer. Our concern about this timeframe was discussed in a phone call with your staff in late November 2012.

We suggest the Department consider a modification to the "Race to the Date" that would reward facilities for incremental progress towards Baby-Friendly designation. For example, facilities could receive specific dollar awards for completion of each of the phases of the 4-D Pathway with an ultimate final dollar award when designation is achieved. BFUSA would be delighted to further discuss this proposal.

Below is a chart indicating the status of South Carolina hospitals currently in the 4-D Pathway (<http://www.babyfriendlyusa.org/get-started>).

4-D Pathway Phase	# SC Hospitals in Phase	Comments
Discovery	6	It will be nearly impossible for these facilities to effectively implement sustainable changes in the timeframe specified by the Challenge.
Development	6	5 of these facilities are participating in a special Learning Collaborative for Quality Improvement in Maternity Care Practices project funded by the CDC. Under this project, facilities are expected to be ready for assessment by September 2014.
Dissemination	0 <i>5</i>	
Designation	3	Sufficient progress is already in place for these facilities to allow possible achievement of the goal within your time frame.
<b>Total Participation</b>	<b>15</b>	

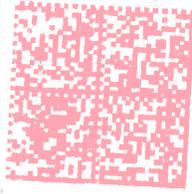
Thank you for your work to implement the Baby-Friendly Hospital Initiative in South Carolina. We look forward to working with you on this project.

Sincerely,



Trish MacEnroe @ BABY FRIENDLY USA. org  
Executive Director

Baby-Friendly USA  
125 Wolf Road, Suite 311  
Albany, NY 12205



US POSTAGE  
\$ 00.46  
Mailed From 12205  
02/01/2013  
031A 0002306664

**RECEIVED**

FEB 04 2013

Department of Health & Human Services  
OFFICE OF THE DIRECTOR

Anthony E. Keck, Director  
So Carolina DOH & Human Services  
PO Box 8206  
Columbia SC 29202-8206

292028206 B014



February 20, 2013

Ms. Trish MacEnroe, Executive Director  
Baby-Friendly USA  
125 Wolf Road, Suite 311  
Albany, New York 12205

Dear Ms. MacEnroe:

Thank you for your letter of January 30, 2013, regarding your efforts to incentivize South Carolina hospitals to achieve Baby-Friendly designation. We appreciate your offer to provide feedback in assisting us to improve their chances for success in reaching Baby-Friendly designation.

While we announced the incentive to those qualified hospitals that achieve the Baby-Friendly Hospital designation by September 30, 2013, we have maintained flexibility in that date and realize that the date will probably need to be amended. I have asked that Vicky Ducworth and Jim Bradford on our staff contact you to discuss modifying the dates and to work directly with you and your team in coordinating site visits with the goal of making sure each facility has every opportunity to successfully reach Baby-Friendly designation.

We also appreciate your chart indicating the current status of our hospitals in the 4-D pathway. That information has proved to be very helpful. Again, thanks for your letter and we look forward to working very closely with you and your staff over the next several months.

Sincerely,

Roy E. Hess  
Deputy Director

**Brenda James**

---

log # 246 ✓

**From:** Roy Hess  
**Sent:** Tuesday, March 05, 2013 4:39 PM  
**To:** Janet Bell; Brenda James  
**Subject:** RE: Log letter 000246

We had a scheduled call yesterday with Baby Friendly to discuss the issues and will be rescheduled, due to my illness.

---

**From:** Janet Bell  
**Sent:** Wednesday, February 27, 2013 2:20 PM  
**To:** Brenda James  
**Cc:** Roy Hess; Janet Bell  
**Subject:** Log letter 000246

Brenda,

This log was due on February 22, 2013, and we have a draft prepared. However, Roy would like to talk with Deirdra before it can be mailed. I'm thinking he plans to do this tomorrow. Due to Director's Keck's emphasis on getting the letters out by your deadline, I am asking for an extension. Thanks!

*Janet R. Bell*

Administrative Coordinator  
Managed Care  
SC Department of Health and Human Services  
PO Box 8206  
Columbia, SC 29202  
(803) 898-3202  
Fax: (803) 255-8235

**Brenda James**

---

Log # 246 ✓

**From:** Janet Bell  
**Sent:** Wednesday, February 27, 2013 2:20 PM  
**To:** Brenda James  
**Cc:** Roy Hess; Janet Bell  
**Subject:** Log letter 000246  
**Attachments:** Log Ltr 000246-Baby Friendly 2013.docx

Brenda,

This log was due on February 22, 2013, and we have a draft prepared. However, Roy would like to talk with Deirdra before it can be mailed. I'm thinking he plans to do this tomorrow. Due to Director's Keck's emphasis on getting the letters out by your deadline, I am asking for an extension. Thanks!

*Janet R. Bell*

Administrative Coordinator  
Managed Care  
SC Department of Health and Human Services  
PO Box 8206  
Columbia, SC 29202  
(803) 898-3202  
Fax: (803) 255-8235

**DEPARTMENT OF HEALTH AND HUMAN SERVICES  
OFFICE OF DIRECTOR**

**ACTION REFERRAL**

TO <i>Hess</i>	DATE <i>2-11-13</i>
-------------------	------------------------

DIRECTOR'S USE ONLY	ACTION REQUESTED
1. LOG NUMBER <i>00-246</i>	<input type="checkbox"/> Prepare reply for the Director's signature DATE DUE _____
2. DATE SIGNED BY DIRECTOR <i>cc: Mr. Keck, Singleton</i>	<input checked="" type="checkbox"/> Prepare reply for appropriate signature DATE DUE <i>2-22-13</i>
	<input type="checkbox"/> FOIA DATE DUE _____
	<input type="checkbox"/> Necessary Action

APPROVALS (Only when prepared for director's signature)	APPROVE	* DISAPPROVE (Note reason for disapproval and return to preparer.)	COMMENT
1.			
2.			
3.			
4.			

Log Roy

CC: Singleton  
Director

**Baby-Friendly USA**  
The gold standard of care

January 30, 2013

Anthony E. Keck, Director  
South Carolina Department of Health and Human Services  
Post Office Box 8206  
Columbia, South Carolina 29202-8206

**RECEIVED**

FEB 04 2013

Department of Health & Human Services  
OFFICE OF THE DIRECTOR

Dear Mr. Keck,

Baby-Friendly USA, Inc. (BFUSA) is excited by the Department of Health and Human Services plans to incentivize hospitals in South Carolina to achieve the Baby-Friendly designation. Improving maternity care practices to support lactation is an extremely important public health goal. Financial rewards are a powerful motivation. Thank you for your efforts.

I would like to take this opportunity to offer feedback in hopes of improving South Carolina hospitals' chances for success in achieving the goal of Baby-Friendly designation. Implementing the Baby-Friendly Guidelines and Evaluation Criteria (<http://www.babyfriendlyusa.org/get-started/the-guidelines-evaluation-criteria>) is an enormous undertaking that requires a facility to conduct a thorough review of their current maternity care practices. It entails changes to policies and protocols, education of staff and patients, and up to 68 specific practice changes. It impacts the work of many disciplines and departments including: maternity, obstetrics, pediatrics, family practice, outpatient clinics, nursing, surgery, anesthesiology, dietary, pharmacy, purchasing, quality improvement and corporate compliance. In addition, forging relationships with external partners is needed to coordinate prenatal education and postpartum support as well as improve the community understanding of the importance of breastfeeding.

It is BFUSA's goal that facilities focus on sustainable practice changes, rather than simply achieving an award. Realistically, unless already well into the 4-D Pathway, initiating the process and implementing all of the practice changes in a sustainable manner within the timeframe outlined in "Race to the Date" is not possible. This timeline could position many South Carolina hospitals for failure. Facilities rushing to put practices in place and prematurely seeking BFUSA assessments typically do not pass. This results in additional staff time for BFUSA and frustration for the

NEW YORK  
125 Wolf Road, Suite 311 · Albany, NY 12205  
PHONE: 518 · 621 · 7982 FAX: 518 · 621 · 7983

MASSACHUSETTS  
449 Route 6A, PO Box 1015 · East Sandwich, MA 02537  
PHONE: 508 · 888 · 8092 FAX: 508 · 484 · 1716

facility. It is also worth noting that BFUSA must honor commitments to the hospitals that are already queued up for assessments this summer. Our concern about this timeframe was discussed in a phone call with your staff in late November 2012.

We suggest the Department consider a modification to the "Race to the Date" that would reward facilities for incremental progress towards Baby-Friendly designation. For example, facilities could receive specific dollar awards for completion of each of the phases of the 4-D Pathway with an ultimate final dollar award when designation is achieved. BFUSA would be delighted to further discuss this proposal.

Below is a chart indicating the status of South Carolina hospitals currently in the 4-D Pathway (<http://www.babyfriendlyusa.org/get-started>).

4-D Pathway Phase	# SC Hospitals in Phase	Comments
Discovery	6	It will be nearly impossible for these facilities to effectively implement sustainable changes in the timeframe specified by the Challenge.
Development	6	5 of these facilities are participating in a special Learning Collaborative for Quality Improvement in Maternity Care Practices project funded by the CDC. Under this project, facilities are expected to be ready for assessment by September 2014.
Dissemination	0	
Designation	3	Sufficient progress is already in place for these facilities to allow possible achievement of the goal within your time frame.
<b>Total Participation</b>	<b>15</b>	

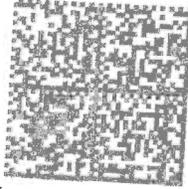
Thank you for your work to implement the Baby-Friendly Hospital Initiative in South Carolina. We look forward to working with you on this project.

Sincerely,

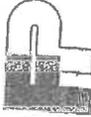


Trish MacEnroe  
Executive Director

Baby-Friendly USA  
125 Wolf Road, Suite 311  
Albany, NY 12205



US POSTAGE  
\$ 00.46



Mailed From 12205  
02/01/2013  
031A 0002306664

Anthony E. Keck, Director  
So Carolina DOH & Human Services  
PO Box 8206  
Columbia SC 29202-8206

**RECEIVED**

FEB 04 2013

Department of Health & Human Services  
OFFICE OF THE DIRECTOR



29202-8206 8044