

IBCLC Commission
International Board of Lactation Consultant Examiners®

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February 21, 2024

ATTN: Ms. Kate Sanderson, State Coroner's Registrar
Mr. John Munro, Senior Coroner's Registrar
Ms. Abigail Smith, Senior Solicitor
State Coroner, Judge John Cain—Team 3
Coroner's Court of Victoria

Via email: cpuresponses@coronerscourt.vic.gov.au

Re: COR 2021 003672

Dear Madams and Sir:

The International Board of Lactation Consultant Examiners® (IBLCE®) has received your correspondence regarding the investigation into this matter through IBLCE's regional director located in Australia.

We are all most deeply saddened to learn of this loss that led to the recommendation.

As the recommendation involved review of the requirements for the lactation consultant certification, this matter falls under the purview of the International Board Certified Lactation Consultant (IBCLC) Commission of IBLCE and has been reviewed and considered by the IBCLC Commission which includes a public representative.

The Commission provides here relevant information and context in order to respond to the recommendation made.

The mission of the nonprofit organisation of IBLCE is to serve the global public interest by advancing professional practice in lactation consultation and support through credentialing. The International Board Certified Lactation Consultant® (IBCLC®) is a voluntary professional credential held by over 37,000 professionals in 134 countries. The certification programme first earned a highly recognised third-party accreditation in 1987 from the accreditation arm of what is now known as the Institute for Credentialing Excellence.

This accreditation, held by numerous highly recognised healthcare certification programmes including the IBCLC programme, provides independent, objective third-party affirmation that the IBCLC certification

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programme has met defined standards regarding many aspects of its programme, including with respect to:

- Programme integrity
- Governance structure, inclusive of public representation
- Representative subject matter experts making key programme decisions
- Knowledgeable professional staff & consultants
- Sound examination development practices and psychometric analysis
- Public access to key certification programme policies & procedures
- Security, inclusive of certification examination administration
- Financial viability and sustainability, important for ongoing certification
- Commitment to quality assurance

The IBCLC Commission has followed the recommendation made pursuant to section 72(a) of the referenced Act, specifically “to review its requirements for lactation consultant accreditation [certification] and ensure that they must have undertaken education that includes a demonstrated understanding of postnatal mental health, how to identify mental health risks and making referrals for appropriate supports to qualify for accreditation [certification].”

The Commission reviewed, discussed in greater detail below, the IBCLC programme’s [Detailed Content Outline](#) (also referred to as examination blueprint), [Scope of Practice](#), and [Clinical Competencies for IBCLCs](#)

The Commission notes that as part of its current prerequisites, a candidate for the IBCLC must be educated in a clinical healthcare profession or provide evidence from a governmental authority that recognises the profession as a clinical health profession or demonstrate a background in health sciences by the completion of health sciences education inclusive of psychology or counseling skills or communication skills.

As a nonprofit, private certification programme, the International Board Certified Lactation Consultant programme administers a rigorous professional certification examination developed by subject matter experts in conjunction with psychometricians. The foundation of a professional certification examination, and indeed the certification programme as a whole, is a practice analysis. A practice analysis is a scientific inquiry conducted to identify the tasks and work activities conducted, the context and environments in which those task and activities are carried out, and the competencies (knowledge, skills, and abilities) required to perform a given role. The primary outcome of a practice analysis is a detailed content outline, also known as an examination blueprint. This serves as the basis of the professional certification examination against which candidates are assessed to earn the credential.

The [credential](#) is time-limited, is earned for a five-year period and requires renewal so as to promote continued competence through professional development and lifelong learning. Those seeking to recertify may do so by examination or by an assessment guiding one’s continuing education. Both the initial certification and the recertification require knowledge pursuant to the Detailed Content Outline.

The Detailed Content Outline¹ includes the following subjects relevant to those identified in the recommendation:

- V. Psychology, Sociology, and Anthropology
 - F. Identifying support networks
 - G. Maternal mental health
 - H. Maternal psychological/cognitive issues

Those seeking recertification by continuing education must take an assessment, which was also created by subject matter experts in consultation with psychometricians (experts in test development) and focus their continuing education pursuant to the results of their recertification assessment.

Therefore, the IBCLC certification programme, inclusive of recertification, assesses knowledge of the subject matter as set forth in the Detailed Content Outline that includes the relevant subjects identified above.

Additionally, the [*Scope of Practice for IBCLCs*](#) specifically contemplates:

- Integrating knowledge and evidence from the disciplines defined in the Detailed Content Outline when providing care for breastfeeding families (p. 1, I., 2.)
- Maintaining knowledge and skills through regular continuing education (p. 1, I., 4.)
- Providing comprehensive, skilled care and evidence-based information for breastfeeding and human lactation, from preconception to weaning, for breastfeeding families. (p. 1, II., 3.)
- Parental mental status in the context of breastfeeding (p. 2, III., 1.)
- Using effective counselling skills when interacting with clients and health care team members. (p.2., III., 8.)
- Reporting, when necessary, truthfully, and fully to the client’s primary health care provider, to the health care system, and/or to the appropriate social services. (p. 2., IV., 2.)
- Providing follow-up services as required. (p. 3, VI., 2.)
- Making referrals to other health care providers and community support resources when necessary. (p. 3, VI., 3.)
- Working collaboratively and interdependently with other members of the health care team to deliver coordinated care to families (p. 3, VI. 4.)

In addition to addressing specific patient mental health topics through examination, recertification, and the scope of practice, IBCLCs are also subject to, in any country or setting where they practice, the [*Clinical Competencies for IBCLCs*](#) which state that the IBCLC has the duty to provide competent services for clients and will:

¹ It should be noted that while the current Detailed Content Outline went into effect in 2023, the previous Detailed Content Outline, dated 2016 also contained these same subjects.

- Practice within the framework of both the Scope of Practice and the Clinical Competencies for the Practice of International Board Certified Lactation Consultants (p. 1, I., 1.)
- Obtain continuing education to enhance knowledge and skills to maintain IBCLC certification. (p. 1, I., 3.)
- Assess the impact of physical, mental, and psychological states of the breastfeeding parent on breastfeeding (p. 2, III., 9.)
- Assess social support and possible challenges (p. 2, III., 11.)
- Assist the client and their family to recognise peripartum mood disorders, access community resources, and manage breastfeeding. (p. 3, III. Skills section, 17.)
- Make appropriate referrals to other health care providers and community support resources in a timely manner depending upon the urgency of the situation (p. 6, VI., 3.)

Those holding the IBCLC are also subject to a Code of Professional Conduct which requires acting with due diligence.

Therefore, respectfully, in response to the Court’s statement that “there is no clarity regarding how mental health is assessed or what referrals are made when concerns arise in [IBCLCs] providing services to new mothers,” the IBCLC Commission has conducted a careful review of the certification programme and believes the IBCLC programme does provide clarity and require instruction on maternal mental health in its Detailed Content Outline against which all IBCLCs study, in its Scope of Practice and the *Clinical Competencies* by which IBCLCs abide.

The IBCLC Commission is sincerely saddened by the loss that has precipitated the State’s recommendations. However, as demonstrated in those recommendations, certification alone does not guarantee effective patient care. Proper training and education, and compliance with applicable laws and regulations related to professional practice, are also critical to effective patient care. The IBCLC Commission will continue to review the IBCLC certification programme for opportunities to address the challenges of maternal mental health, and we look to colleagues in training, education, and regulation to also do the same.

On Behalf of the IBCLC Commission,



Deborah E. Schoch, PhD, RNC, IBCLC, CCE, CPST
Chair, IBCLC Commission



Sara Lake, J.D., CAE
CEO, IBCLE

cc: IBLCE Director, Asia-Pacific & Africa, apa@iblce.org

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