

<p style="text-align: center;">Nutrition Services Department of State Health Services</p>

Effective October 1, 2015

Policy No. AC: 34.0

Breastfeeding Promotion Expenditures

Purpose

To ensure compliance with federal regulations and to account for monies spent on breastfeeding promotion and support.

Authority

7 CFR Part 3016; OMB Circular A-87

Policy

The local agency (LA) shall account for funds spent to promote breastfeeding. Breastfeeding promotion and support expenditures shall be allowable WIC expenses as defined in this policy.

Procedures

- I. Breastfeeding promotion and educational reinforcement items must contain a breastfeeding message and be reasonable and necessary for the promotion and support of breastfeeding in accordance with **Policy AC: 01.0**.
- II. The state agency (SA) shall allocate annually, to each LA, an amount of funds to be spent for breastfeeding promotion. The allocation shall be based on the LA's proportional share of the statewide combined total of pregnant and breastfeeding participants served during the fourth quarter of the previous fiscal year as reported to the SA.
- III. To be considered an allowable cost for breastfeeding promotion, the expenditure shall meet the following criteria:
 - A. The cost shall be clearly attributable to breastfeeding promotion.
Generalized nutrition education, which happens to mention

<p style="text-align: center;">Nutrition Services Department of State Health Services</p>

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Policy No. AC:34.0

breastfeeding, but does not specifically promote breastfeeding, shall not be allowable.

B. The costs shall be an allowable expense under 7 CFR 3016.

C. The cost shall be in excess of the 19% nutrition education requirement.

D. The cost shall be reasonable and necessary.

IV. The following are allowable breastfeeding costs:

A. Salaries and benefits of:

1. WIC staff who deliver educational and direct client services related to breastfeeding;
2. WIC staff who deliver/attend training on breastfeeding promotion and support;
3. WIC staff who participate in State and local planning committees dedicated to breastfeeding promotion;
4. WIC staff who organize volunteers and community groups to support breastfeeding WIC participants; and
5. Peer counselors hired to promote and assist women to continue with an initial decision to breastfeed. Peer counselors may be reimbursed for attending breastfeeding training, attending peer counselor meetings, and performing duties described in [Policy BF:03.0](#). (Also refer to [Policy AC:17.0](#).)

B. Costs to groom staff to become International Board Certified Lactation Consultants (IBCLC). Because college course credits are required, LAs should choose their most qualified health-care staff to become IBCLC, such as RDs or RNs, whenever possible.

1. Allowable costs include:
 - a) College course prerequisites
 - b) Attending educational opportunities to accrue required continuing education
 - c) Exam prep courses
 - d) Reference/study materials

<p style="text-align: center;">Nutrition Services Department of State Health Services</p>

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Policy No. AC: 34.0

- e) Related travel
 - f) International Board of Lactation Consultant Examiners exam fee
 - 2. Local agencies may choose to create a contract or agreement that requires staff who are being reimbursed to become IBCLCs to pay back the local agency in time (e.g. 12 months of WIC LA employment) or cost if they leave LA employment before their time-requirement has been fulfilled.
- C. Honorariums and travel expenses (within boundaries of Texas Department of State Health Services travel policies) of non-WIC professionals to deliver training on breastfeeding promotion and support;
- D. Costs to develop/procure educational materials, teaching aids, instructional curricula, etc., related to breastfeeding promotion and support;
- E. Prorated costs of clinic space devoted to educational and training activities related to breastfeeding, including space and furniture set aside for nursing during clinic hours, which would help provide an environment conducive to breastfeeding;
- F. Salary and benefits expenses and costs of materials, etc., utilized in the evaluation of breastfeeding initiatives (or contractual agreements entered into for this purpose);
- G. Travel and other expenses incurred by WIC staff related to any of the above items;
- H. With prior SA approval, costs of service agreements with other organizations, public or private, to undertake training and direct service delivery to WIC participants, concerning breastfeeding promotion and support; and

<p style="text-align: center;">Nutrition Services Department of State Health Services</p>

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Policy No. AC:34.0

- I. Breastfeeding aids such as large/extra-large breast pump flanges, nipple shields, breast shells, nursing supplementers, nursing bras, nursing pads, and cover-ups that directly support the initiation and continuation of breastfeeding.

- J. Breastfeeding promotion or educational reinforcement items that include a breastfeeding promotion or education message such as:
 - 1. Pencils, pens
 - 2. Magnets
 - 3. Balloons
 - 4. Stickers, buttons
 - 5. Crayons, coloring books
 - 6. Infant t-shirts/bibs
 - 7. Water bottles, stadium cups, plastic cups
 - 8. Small children's books with a breastfeeding message.
 - 9. T-shirts displaying a breastfeeding message for WIC staff to wear in the clinic or at community-based education efforts such as health fairs
 - 10. Plastic picture frames for framing BF posters for WIC clinics or health care provider/hospital outreach.

- V. The following costs are not allowable breastfeeding costs:
 - A. Breastfeeding certifications other than IBCLC, such as Certified Lactation Counselor (CLC).

 - B. Breastfeeding aids that do not directly support the initiation and continuation of breastfeeding and are not within the scope of the WIC Program such as topical creams/ointments (e.g.lanolin), hydrogel, Vitamin E, other medicinals, and breastfeeding-specific foot stools and infant pillows.

 - C. Costs of promotional campaigns/items (print, radio, television) aimed at a general audience concerning breastfeeding unless materials may also be legitimately used with WIC participants or trainees in an educational context.

<p style="text-align: center;">Nutrition Services Department of State Health Services</p>

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Policy No. AC:34.0

- D. Items of nominal value, which have no breastfeeding message.
- E. Breastfeeding promotion and educational reinforcement items should not be purchased when limited funds means other more pressing needs go unaddressed (e.g., contact with lactation consultant for high risk counseling).
- F. Special equipment for general use in WIC clinics such as baby weight scales marketed for use with high-risk breastfed infants.
 - 1. Exceptions: The rental of the scale shall be considered an allowable program cost in the situation where a high-risk breastfed infant needs frequent weight monitoring and Medicaid will not cover the cost of the rental.
 - a. A physician's prescription for the scale shall be kept on file in the participant's medical record. The prescription shall document the need for the scale, the length of time the scale shall be needed, the assurance that the infant shall be monitored by a medical professional and assurance that the medical professional will give the mother instructions on proper use of the scale.
 - b. To avoid potential liability regarding the use of the scale, it shall not be WIC's responsibility to provide monitoring or instruction on the use of the scale.
 - 2. Exception: the cost to purchase a baby weight scale shall be considered an allowable expense if the local agency maintains a lactation center staffed by an IBCLC whose primary function is to help WIC Participants with breastfeeding.
- G. The purchase or lease of breast pumps. Breast pumps are a food expenditure and shall be ordered through the SA.
- VI. Contact the state agency Breastfeeding Coordinator for approval of any breastfeeding promotion or educational reinforcement items not listed in section I.