



Washington State WIC Nutrition Program
 Allowable Costs for
 Breastfeeding Peer Counseling Program



Item	Breastfeeding Peer Counseling
Audit costs	Yes. An agency can bill audits to peer counseling as part of an agency’s fair and equitable indirect cost allocations.
Benefits	Yes. For the hours peer counselor spend working in the peer counseling program. Staff in dual roles must do timekeeping.
Breastfeeding services for non-WIC participants	<p>No. However, peer counselors can meet with potential WIC participants in hospitals and classes to introduce WIC services and the peer counseling program.</p> <p>Peer counselors can’t facilitate ongoing public groups where both non-WIC participants and WIC participants are together. Examples include hospital prenatal or post-partum groups. Peer counselors should refer WIC-eligible women to WIC.</p>
Breast pump program management	No.
Breast pumps and pump kits	No.
Breastfeeding services provided by men	<p>No. Men can’t be peer counselors.</p> <p>Peer counselors must meet the criteria of a bona fide occupational qualification. Men don’t meet USDA’s definition of a peer counselor.</p>
Breastfeeding accessories, such as <ul style="list-style-type: none"> • nursing bras • milk storage bags • breast pads • car adapters for pumps • pressure gauges for pumps • Milkies 	No.
Breastfeeding aids, such as <ul style="list-style-type: none"> • nipple shields • breast shells • supplemental nursing systems (SNS) 	<p>Yes. Only when used for demonstration purposes with peer counselors.</p> <p>Note: The agency must have policies or protocols approved by state staff before ordering these items.</p>
Breastfeeding bras or bustiers for “hands free” pumping	No.
Breastfeeding coalitions	<p>Yes. The agency can only use BFPC funds for peer counselors attending meetings.</p> <p>The agency can’t use BFPC funds for supporting coalition activities.</p>
Breastfeeding demonstration and education materials for Peer Counselors	Yes.



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Breastfeeding demonstration and education materials for WIC staff	No.
Breastfeeding foot stools and nursing pillow	No.
Breastfeeding hotlines, warm lines and call centers	<p>Yes. Expenses related to hotlines or call centers are allowed for the portion of expenses peer counselors provide participant contacts to peer counseling participants.</p> <p>Other expenses related to the hotline or call centers for peer counseling such as rent, phone lines, equipment, are allowed, if prorated. The peer counselor must meet the definition of peer counselor and receive appropriate training and supervision as outlined in the USDA peer counseling curriculum training.</p>
Breastfeeding IBCLC exam fees IBCLC = International Board Certified Lactation Consultant	No.
Breastfeeding medicinals	No.
Breastfeeding reviews	<p>Yes. Peer counselors can do breastfeeding reviews. However, agencies must assure all staff providing services to participants are trained to provide breastfeeding reviews. Peer counselors can't completely meet this need.</p>
Breastfeeding salaries and benefits for International Board Certified Lactation Consultants (IBCLCs)	<p>Yes. Agencies can use BFPC funds to hire IBCLCs for:</p> <ul style="list-style-type: none"> • oversight and management of the BFPC program. • supervision and mentoring of peer counselors. • referral expertise for peer counselors. <p>The agency can't use BFPC funds to disproportionately hire lactation management experts versus peer counselors. The majority of the agency's peer counselor program <u>salary costs</u> must be designated for peer counselors to provide participant services.</p> <p>The agency may use BFPC funds or WIC NSA to pay for IBCLC time if a peer counselor refers a WIC mother to an IBCLC for consultation outside of the peer counselor's scope of practice.</p> <p>The agency may use BFPC funds or WIC NSA to compensate the IBCLC if the peer counselor continues to support the mother and remains part of the peer counselor's caseload.</p>
Breastfeeding shirts and covers	No.
Breastfeeding training and coursework for peer counselors to	No. WIC NSA funds may be used for CLC or IBCLC training and coursework. The priority use of BFPC funds is to hire and train peer



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become IBCLCs or Certified Lactation Counselors (CLCs)	counselors to provide breastfeeding peer counselor services to WIC participants. USDA doesn't want peer counseling programs heavily focused on training and coursework for peer counselors to become IBCLCs. The research recommends that peer counselor be provided career path training options.
Continuing education for PC leads/DBE's	Yes , if it relates to servicing peer counseling programs (e.g., mentoring, serving as a referral)
Breastfeeding travel costs for home visits	Yes , for peer counselors only, including expenses incurred to make home visits, including local travel to see participants, parking costs and tolls.
Childcare or services for WIC staff	No.
Clothing	Yes. T-Shirts, buttons and similar items identifying staff as peer counselors.
Computers and laptops	Yes , if used 100% of the time for peer counseling training and services.
Diapers	No.
Education materials for participants	No.
Employee morale, health and welfare Costs	No.
Entertainment costs	No.
Equipment (major)	No.
Equipment (minor)	No. Washington State doesn't allow local agencies to purchase portable baby scales or other anthropometric equipment with BFPC funds.
Facility costs	Yes. Agencies must pro-rate expenses to reflect costs for only peer counseling services.
Farmers Market Nutrition Program – operational costs	No.
Feeding tubes	No.
Food costs	No.
Gift cards	No. The agency isn't allowed to provide gift cards to encourage breastfeeding, or as a reward for attending classes or participating in the peer counselor program.
Immunizations	No.
Incentive items (to reinforce nutrition education or breastfeeding messages)	No.
Indirect	Yes. However, indirect program costs for BFPC programs can't exceed the agency's approved indirect rate. Agencies must pro-rate expenses to reflect costs for only peer counseling services.



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Interpreter/translator services	No. WA peer counselors may use the Language Line without charging the grant, at no cost.
Lobbying	No.
Memberships, subscriptions, and professional activity costs	No.
Monitoring and evaluation of program effectiveness	No. The agency may not use BFPC funds for evaluation studies. However, funds may be used to monitor and track program components (e.g., contacts, referrals, training) to determine effectiveness and where improvements are needed. However, the agency may not use BFPC funds to pay for evaluation studies.
Nutrition education individual contact (NE-Individual/2C)	No. Agencies can't use BFPC funds to pay peer counselors to do second nutrition education contacts.
Office supplies, office furniture (see equipment-minor)	Yes, if used by peer counselors for contacts with participants. The costs of these items must be prorated or used only by peer counselors. The agency must use the majority of the peer counseling funds to pay peer counselors to provide direct services to WIC participants.
Outreach and promotion	Yes, only if items promote the BFPC Program. Local agencies can't use a large portion of the BFPC funds on advertising at the expense of direct services to participants.
Pedometers	No.
Provision of physical activity	No.
Rent	Yes. Agencies must pro-rate expenses to reflect the cost of space used only for peer counseling services.
Salaries and wages (Employee Compensation)	Yes, for the percentage of time spent by peer counselors, peer counselor leads and peer counselor supervisors doing activities directly related to peer counseling. Staff in "dual-roles" must meet the definition of a peer counselor in the USDA Peer Counseling curriculum training, including being available to participants outside of regular WIC hours. The agency can't use peer counseling funds when dual-role staff are assigning food packages and issuing benefits. Staff working in WIC or other programs, must do continuous time keeping documenting the time spent on the BFPC Program versus other programs.
Scales	No.
Security	Yes, as long as the security costs are included in facilities or indirect cost allocations.



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Staff recruitment	Yes , only if recruiting peer counselors and staff directly involved in the BFPC Program.
Subcontracting for peer counseling services	Yes . Contact state office for guidance.
Supplies	Yes , for items directly used by peer counselors or to support the peer counselor program.
Travel for training of peer counselors and peer counseling staff/managers	<p>Yes, for peer counselors.</p> <p>Yes, for peer counselor leads, peer counselor supervisors or managers for training that relates to managing, supervising and mentoring peer counselors.</p>

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