

## Allowable Costs for Breastfeeding Peer Counseling Funds

Breastfeeding peer counseling (BFPC) funds distributed to State agencies by the Food and Nutrition Service (FNS) are to be used to develop or expand activities necessary to sustain a peer counseling program based on the FNS [Loving Support Model](#). The primary purpose of the funds is to provide direct breastfeeding support services through peer counseling to WIC participants. A State agency's peer counseling implementation plan and annual line item budget addendum to its State Plan must demonstrate an appropriate balance between direct service delivery by peer counselors and the purchase and use of equipment and materials. The use of BFPC funds for expenditures that are not supported by the [Loving Support Model](#) are not authorized.

The table below helps to identify allowable breastfeeding peer counseling costs.\*

NSA = Nutrition Services and Administration; IBCLC = International Board Certified Lactation Consultant

Item or Service	Allowable Costs	Comments
<b>Durable Goods and Space</b>		
Furniture, computers/laptops, and office equipment used to provide peer counseling services and training	Yes	
Phone lines, internet service, cell/smartphones, pagers and answering machines for contacts between peer counselors and mothers	Yes	
Portable baby scales for peer counselors to weigh infants outside of the WIC clinic	Yes. Adequate training and supervision of the peer counselor by an IBCLC or other lactation expert and policies surrounding the use of scales and their purpose must be in place.	NSA funds may be used to purchase scales for use by staff other than peer counselors.
Space and lease costs for peer counselors to provide services	Yes	
<b>Incentives and Educational Materials to Promote Breastfeeding</b>		
Breastfeeding educational materials for mothers such as pamphlets and DVDs	No	NSA funds may be used for this purpose.

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Breast pumps and breastfeeding aids for mothers	No	NSA funds may be used for this purpose.
Breast pumps and breastfeeding aids for <i>demonstration</i> purposes by peer counselors	Yes	
Incentive items distributed to WIC participants to encourage breastfeeding	No	NSA funds may be used for this purpose.
<b>Personnel and Compensation</b>		
Salaries and compensation for peer counselors, designated peer counselor coordinators, and referral experts	Yes	
Salaries and compensation for International Board Certified Lactation Consultants (IBCLCs)	<p>Yes, BFPC funds may be used to hire IBCLCs to provide oversight/management of peer counseling programs and/or supervision, mentoring and referral expertise for peer counselors.</p> <p>BFPC funds may also be used 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. The IBCLC may be compensated using BFPC funds if the mother continues to be supported by the peer counselor and remains part of the peer counselor's caseload.</p>	<p>BFPC funds cannot be used to disproportionately hire lactation management experts versus peer counselors. NSA funds may be used to strengthen general IBCLC breastfeeding expertise in WIC.</p> <p>NSA funds must be used for IBCLC consultations for WIC mothers who are not referred by peer counselors and are not part of a peer counselor's case load.</p>

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Salaries and compensation for dual-role staff, e.g., part-time WIC Nutrition Assistant and part-time peer counselor	Yes, BFPC funds may be used for the portion of time spent as peer counselor. The “dual-role” staff must meet the definition of peer counselor in the <a href="#">Loving Support Model</a> , including being available to participants outside of regular WIC hours.	Definition of Peer Counselor: <ul style="list-style-type: none"> <li>Paraprofessional (see <a href="#">Loving Support Model</a> for definition)</li> <li>Recruited and hired from target population, and</li> <li>Available to WIC clients outside usual clinic hours and outside the WIC clinic environment</li> </ul>
Males as Breastfeeding Peer Counselors	No. The definition of peer counselor in the <a href="#">Loving Support Model</a> is based on research demonstrating the benefit of hiring peer counselors from WIC’s target population of WIC-eligible women.	Men can be valuable members of breastfeeding promotion and support activities in WIC, such as providing father-led support groups and other activities to support breastfeeding mothers and families. However, components and activities that are outside of those defined by the <a href="#">Loving Support Model</a> must be funded through the regular NSA grant or other sources.
Recruitment of peer counselors and related staff	Yes	

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Staffing and expenses related to breastfeeding hotlines and call centers.	Yes. BFPC funds may be used to hire peer counselors to answer calls to a WIC breastfeeding hotline if the peer counselor meets the definition of peer counselor and receives the appropriate training and supervision as outlined in the <a href="#">Loving Support Model</a> . Other expenses related to the hotline/call center such as rent, phone lines, equipment, are allowable for any portion of those expenses that are for the purpose of a peer counselor providing participant contacts through the hotline/call center.	
<b>Staff Training and Resources</b>		
Travel for training of peer counselors and peer counseling staff/managers	Yes	
Travel for home and hospital visits by peer counselors	Yes	
Continuing Education for IBCLCs	Yes, if it relates to peer counseling programs (e.g., , managing, mentoring, serving as a referral)	
Breastfeeding resources for peer counselors and peer counseling coordinators/supervisors	Yes, if the resources are related to peer counseling, e.g., training materials for peer counselors.	
Breastfeeding resources for WIC staff not related to peer counseling	No.	NSA funds may be used to purchase general breastfeeding resources for WIC staff.

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Training and coursework for peer counselors to become IBCLCs or certified lactation counselors (CLCs)	Yes. The research recommends that peer counselors be provided career path options (e.g., training/experience to become senior level peer counselors; advanced training to become lactation consultants, etc.).	The priority use of BFPC funds is to hire and train peer counselors to provide breastfeeding peer counseling services to WIC participants. FNS would not expect to see State agency BFPC implementation plans heavily focused on training and coursework for peer counselors to become IBCLCs or CLCs.
CLC renewal fees	Yes. See above	See above.
IBCLC exam fees	No	At the WIC State agency's discretion, NSA funds may be used for IBCLC exam fees and/or association membership fees. The State agency must determine if it is necessary and of benefit to the WIC Program for the person in a particular job position to have the certification. SAs must also determine whether or not the cost fits within its WIC NSA grant budget.
IBCLC association membership fee	No	
<b>Peer Counseling Program Advertising and Promotion</b>		
Pamphlets and similar materials to promote the peer counseling program	Yes	

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Media campaigns, e.g., bus placards, to advertise breastfeeding peer counseling programs	Yes	FNS would not expect to see a large portion of the BFPC funds spent on advertising the program at the expense of direct services to participants.  BFPC funds may not be used for ads that promote breastfeeding in general—NSA funds may be used for those purposes.
T-Shirts, buttons and similar low-cost items that identify peer counselors	Yes	
<b>Miscellaneous</b>		
Indirect Program Costs (e.g., lease/rental costs, copying costs, HR services, legal services, utilities)	Yes	
Second nutrition education contacts	No. BFPC funds are for activities that are in addition to current required WIC activities.	NSA funds provide for at least two nutrition education contacts; therefore, BFPC funds may not be used for the “second” contact.  In addition, the 1/6 <sup>th</sup> nutrition education requirement and breastfeeding target must be met with regular NSA funds.
Childcare	No	
Cribs or other materials and equipment for infants of peer counselors who bring their babies to work	No	
Monitoring and Tracking of Program Effectiveness.	Yes. Funds may be used to monitor and track program components (e.g., contacts, referrals, training) to	

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	determine effectiveness and where improvements are needed. However, evaluation studies may not be paid for using BFPC funds.	
Peer counseling services to non-WIC participants	In general, no. Peer counselors should refer WIC-eligible women to WIC to apply for WIC benefits. Peer counselors should refer women who are not WIC-eligible to appropriate non-WIC resources.	In situations where both non-WIC participants and WIC participants are together, e.g., hospitals, peer counselors may initially see both. However, on-going peer counseling contacts with non-WIC participants is not an allowable cost.
Breastfeeding coalitions	No.	BFPC funds can only be used for services and activities related directly to peer counseling.

\* Updated 5/10/2013. This is not an exhaustive list of allowable costs. Refer to the FNS Regional Office for questions about allowable costs.