

# Allowable Costs for Breastfeeding Peer Counseling Programs

**UPDATED January 2023**

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

The tables below help to identify allowable BFPC costs.\*

## Durable Goods and Space

Item or Service	Allowable Costs	Comments
Furniture, desktop computers/laptops/tablets, 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 participants	Yes	
Portable baby scales to weigh infants outside of the WIC clinic or scales marketed for pre- and post-breastfeeding weight checks	No	Nutrition Services and Administration (NSA) funds may be used to purchase scales for clinical assessment for use by staff other than peer counselors.
Space and lease costs for peer counselors to provide services	Yes	

## Incentives and Educational Materials to Promote Breastfeeding

Item or Service	Allowable Costs	Comments
Breastfeeding educational materials for participants	No	NSA funds may be used to purchase participant educational material.

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Item or Service	Allowable Costs	Comments
Breast pumps and breastfeeding aids	No	Refer to Breastfeeding Policy and Guidance for more information on breast pumps and allowable breastfeeding aids.
Breast pumps and breastfeeding aids for <i>demonstration</i> purposes by peer counseling staff	Yes	
Incentive items distributed to WIC participants to encourage breastfeeding (e.g., breast pumps, breastfeeding aids, breastfeeding promotion and support incentive items, written materials, etc.)	No	NSA funds may be used to purchase participant incentive items

**Personnel and Compensation**

Item or Service	Allowable Costs	Comments
Salaries and compensation for peer counseling staff: peer counselors, designated peer counselor coordinators, and WIC Designated Breastfeeding Experts (DBE)	Yes. BFPC funds may be used to fund staff to provide oversight/management of peer counseling programs and/or supervision, mentoring and referral expertise for peer counselors. BFPC funds may be used to pay for DBE time if a peer counselor refers a WIC participant to a DBE for problems that are outside of the peer counselor’s scope of practice. The DBE may be compensated using BFPC funds if the participant continues to be supported by the peer counselor and remains part of the peer counselor’s caseload.	BFPC funds cannot be used to disproportionately hire WIC DBEs versus peer counselors. NSA funds must be used for consultations for WIC participants who are not referred by peer counselors and are not part of a peer counselor’s caseload. Refer to the Nutrition Services Standards for DBE qualifications, roles, and responsibilities.
Salaries and compensation for dual-role staff (e.g., part-time WIC Nutrition Assistant and part-time peer counselor or part-time CPA and part-time DBE)	Yes, but costs must be allocated between the two positions held. BFPC funds may be used for the portion of time spent as peer counselor or the DBE. See FNS Breastfeeding Policy and Guidance document for additional information on dual-role staff. State agency policies must be approved by FNS Regional Offices.	

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Males as breastfeeding peer counselors	No. The definition of peer counselor in the <a href="#">WIC Breastfeeding Model Components for Peer Counseling</a> is based on research demonstrating the benefit of hiring peer counselors from WIC's target population of WIC-eligible women.	
Father-to-Father Breastfeeding Support Group	No	Fathers are valuable partners of breastfeeding promotion and support in WIC. However, father-led activities are outside of those defined by the <a href="#">WIC Breastfeeding Model Components for Peer Counseling</a> . See FNS Peer Counseling Management Curriculum for additional information.
Virtual Breastfeeding Support Groups (i.e., Facebook, Zoom)	Yes, only for PC/DBE staff hours for monitoring and engaging with WIC participants in a Virtual Support Group that provides breastfeeding support services.	BFPC funds cannot be used for breastfeeding support to non-WIC participants.
Recruitment of peer counselors and related staff	Yes	
Staffing and expenses related to WIC Peer Counselor support to breastfeeding hotlines and call centers	Yes. BFPC funds may be used to fund peer counselors to answer calls to a WIC breastfeeding hotline if the peer counselor: 1) meets the definition of peer counselor; 2) receives the appropriate training and supervision as outlined in the <a href="#">WIC Breastfeeding Model Components for Peer Counseling</a> ; and 3) does not provide services to non-WIC participants. Other expenses related to the hotline/call center (e.g., rent, phone lines, equipment, etc.) are allowable for any portion of those expenses that are for the purpose of a WIC peer counselor providing WIC participant contacts through the hotline/call center.	BFPC funds cannot be used for breastfeeding hotline support to non-WIC participants.
Milk Banks/Depots	No. BFPC funds cannot be used for services related to milk banks/depots.	
Drop-In Breastfeeding Groups	Yes. BFPC/DBE time may only be used for WIC participants.	BFPC/DBE time may not be counted toward nutrition education contacts.

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Item or Service	Allowable Costs	Comments
Staffing and expenses related to WIC Peer Counselor support to the Buddy Program	Yes. Duties such as matching buddy pairs, responding to buddy requests/inquiries, following up on buddy interactions, prompting discussions with conversation starters, and other duties as assigned by peer counselor supervisor.	

**Staff Training and Resources**

Item or Service	Allowable Costs	Comments
Travel for WIC State required training of peer counselors/DBE and peer counseling staff/managers	Yes, only for the FNS Breastfeeding trainings or WIC State-developed approved comparable training.	NSA funds may be used for attendance at a state/national breastfeeding conference.
Travel for home and hospital visits by peer counseling staff	Yes, for visits to WIC participants; peer counselors may not provide services to non-WIC participants.	
Continuing education for DBEs	Yes, if it relates to servicing peer counseling programs (e.g., mentoring, serving as a referral, etc.)	
Breastfeeding resources for peer counseling staff	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.
Training and coursework for peer counselors to become International Board-Certified Lactation Consultant (IBCLC) or Certified Lactation Counselor (CLC)	No. NSA funds may be used for CLC or IBCLC training and coursework.	The priority use of BFPC funds is to hire and train peer counselors to provide breastfeeding peer counseling services to WIC participants. Staff with IBCLCs are not considered peer counselors. The research recommends that peer counselors be provided career path training options.

**ALLOWABLE COSTS FOR BREASTFEEDING PEER COUNSELING PROGRAMS**

<b>Item or Service</b>	<b>Allowable Costs</b>	<b>Comments</b>
CLC or IBCLC exam, renewal, or membership fees	No	At the WIC State agency's discretion, NSA funds may be used for CLC or IBCLC training, exam fees, renewal 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 the cost fits within its WIC NSA grant budget.

**Peer Counseling Program Advertising and Promotion**

<b>Item or Service</b>	<b>Allowable Costs</b>	<b>Comments</b>
Pamphlets and similar materials to promote the peer counseling program	Yes	
Media outreach (e.g., bus placards, paid social media and digital ads to advertise BFPC programs)	Yes	Media outreach using BFPC funds is allowed if directly recruiting peer counselors or informing WIC participants about the PC program, including the Buddy Program, as a WIC breastfeeding benefit. FNS would not expect to see a disproportionate amount 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 this purpose.
Name badges, buttons and similar low-cost items that identify peer counselor staff	Yes	

**Miscellaneous**

<b>Item or Service</b>	<b>Allowable Costs</b>	<b>Comments</b>
Indirect costs (e.g., personnel, accounting, or information technology services, etc.)	Yes, but only costs that are related to providing a WIC peer counseling program.	

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Item or Service	Allowable Costs	Comments
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, etc.) to determine effectiveness and where improvements are needed.	Evaluation studies may not be paid for using BFPC funds.
Peer counseling services to non-WIC participants	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.	
Breastfeeding coalitions	No	BFPC funds can only be used for services and activities related directly to peer counseling.

\*Updated January 2023. This is not an exhaustive list of allowable costs. Refer to the FNS Regional Office for questions about allowable cost and to the Breastfeeding Policy and Guidance.

## Reference – Complete Listing of Hyperlinks

[WIC Breastfeeding Model Components For Peer Counseling \(https://wicworks.fns.usda.gov/sites/default/files/media/document/WIC\\_Breastfeeding\\_Model.pdf\)](https://wicworks.fns.usda.gov/sites/default/files/media/document/WIC_Breastfeeding_Model.pdf).

Minnesota Department of Health - WIC Program 85 E 7<sup>th</sup> Place, PO BOX 64882, ST PAUL MN 55164-0882; 651-201-3942, [health.wic@state.mn.us](mailto:health.wic@state.mn.us), [www.health.state.mn.us](http://www.health.state.mn.us); To obtain this information in a different format, call: 651-201-3942

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