POLICY
Local programs may use federal WIC funds to purchase incentive items for outreach, breastfeeding promotion and, in certain instances, nutrition education.

PURPOSE
Program incentive items purchased with federal WIC funds must meet the guidelines outlined below.

RELEVANT REGULATIONS
ASM 95-44—Allowability of costs for program incentive items.

OREGON WIC PPM REFERENCES
♦ 452—Civil Rights
♦ 712—Breastfeeding: Breast Pump Ordering, Distribution and Tracking Guidelines

DEFINITIONS
Program incentive item: An item, usually of nominal or small cost, given to support outreach efforts, to promote breastfeeding, or to support a nutrition education message. These are also referred to as souvenirs or promotional items.

Reasonable cost: Cost for an incentive item that meets all the criteria below:
- provides a benefit to the program or program goals appropriate to the cost incurred,
- is comparable with the cost of similar items from other vendors,
- has high priority when compared to other needs for which administrative funds could be used,
- has a proven or reasonably expected outcome related to outreach, nutrition education, or breastfeeding promotion.

Necessary cost: Costs needed to carry out essential program functions and that cannot be avoided without adversely impacting program effectiveness.

PROCEDURE
Guidelines
1.0 Program incentive items purchased with federal funds must meet the guidelines below:
1.1. The item(s) reinforce an outreach, nutrition education, or breastfeeding message or concept.
   1.1.1. The item may display an agency logo, however the agency logo alone is not adequate. The item itself must carry a message, meaning or association that contributes to a corresponding outreach, nutrition education or breastfeeding promotion activity.

**Incentive Items**

2.0 **All** program incentive items should:

2.1. Include the program or educational information on printed materials.

2.2. Fit the definition of a reasonable and necessary cost.

2.3. Be intended for use by participants, potential participants, or persons providing outreach or referral services to promote WIC.

2.4. Be culturally appropriate for the target population in both language and symbolism.

2.5. Be safe and in keeping with established outreach, nutrition education, and breastfeeding principles, and with what is considered best practice in maternal child health and nutrition.

**Inappropriate Items**

2.5.1. Examples of items that might not be appropriate, depending on the setting, include baby bottles, items with infant formula company logos, high sugar foods or small objects and balloons that might pose a choking hazard.

**Outreach**

3.0 Incentive items for promoting **outreach** should:

3.1. Have high exposure among the target audience.

3.2. Include the nondiscrimination statement, logos, and the alternative format statement (refer to ♦452—Civil Rights) for printed materials.

3.3. Contain a WIC-specific message that targets the potential eligible population.

3.4. Include WIC contact information or phone number.

3.5. Examples of appropriate outreach incentive items include, but are not limited to:

- T-shirts
- Buttons
- Bibs
- Toothbrushes
- Pens
- Magnets
- Sippy cups
Nutrition Education

4.0 Incentive items for promoting nutrition education should:

4.1. Only be purchased if there is adequate funding to support basic program requirements for nutrition education.

4.2. Have a WIC nutrition education message, reinforce a message or be given along with something that does.

4.3. Be distributed to the audience for which the items were designed (i.e., sippy cups to infants).

4.4. Examples of appropriate nutrition education incentive items include, but are not limited to:

• Calendars with nutrition education messages
• Sippy cups
• Items that support oral health (toothbrushes, floss, sterile gauze squares)
• Fruit and vegetable stickers

Breastfeeding Promotion

5.0 Incentive items for promoting breastfeeding should:

5.1. Either:

• Convey information that encourages and supports breastfeeding, and/or;
• Inform participants about the benefits of breastfeeding, and/or;
• Provide positive reinforcement to mothers who choose to breastfeed and/or continue to breastfeed.

5.2. Examples of appropriate breastfeeding promotion incentive items include, but are not limited to:

• T-shirts with a breastfeeding message
• Buttons with a breastfeeding slogan
• Sippy cups

Breast pumps and breastfeeding aids

5.3. Breast pumps and breastfeeding aids (such as breast shells and supplemental feeders) are not incentive items. Local programs shall order breast pumps through the state purchasing program described in 712—Breastfeeding: Breast Pump Ordering, Distribution and Tracking Guidelines. Breastfeeding aids are an allowable administrative expense to be used in support of identified breastfeeding needs of individual clients.

Inappropriate use of federal funds

5.4. Do not use federal funds to purchase items that do not meet the guidelines above. Examples of items that do not meet these guidelines include:

• Items associated with celebrations intended for staff only.
• Items designed primarily as staff morale boosters.
• Outreach items that have minimal public display.
• Items not intended for use by participants, potential participants, or persons providing outreach or referral services to promote WIC.

Public Information

6.0 All program incentive items should be able to withstand review, audit, and public scrutiny for appropriate expenditure of public funds. If you have questions about a planned incentive, contact the state WIC program at (503) 731-4022.

6.1. Ensure that funding is available for all required program functions, especially nutrition education, before considering the purchase of incentive items.

6.2. If funding is limited, you might want to pursue donations as a way to obtain incentive items. Donated incentive items (not purchased with WIC funds) should meet the guidelines above in order to convey consistent outreach, nutrition education and breastfeeding messages.

POLICY HISTORY

<table>
<thead>
<tr>
<th>Date</th>
<th>* Major Revision, Minor revision</th>
</tr>
</thead>
<tbody>
<tr>
<td>6-16-17</td>
<td>Revision</td>
</tr>
</tbody>
</table>

The date located at the top of the policy is the implementation date unless an “effective date” is noted on the policy. Policies will become compliance findings 6 months from the implementation date.

Release notes can be found in the corresponding document on the Policy and Procedure Manual page.

*Major Revisions*: Significant content changes made to policy.

Minor Revisions: Minor edits, grammatical updates, clarifications, and/or formatting changes have occurred.

Date of Origin: Date policy was initially released.

If you need this in large print or an alternate format, please call 971-673-0040.

This institution is an equal opportunity provider.