



Policy 460

Program Incentive Items and other Allowable Costs

July 1, 2025

POLICY

Local programs may use federal WIC funds to purchase incentive items and, in very limited situations, meals and refreshments.

PURPOSE

The purpose is to provide specific guidance for purchasing incentive items and the provision of meals and refreshments.

RELEVANT REGULATIONS

2 CFR 200.403 through 200.45

7 CFR 246.14(c)

FNS WIC Policy Memorandum #95-5

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

[OAM 10.40.10](#)—Non-travel Meals and Refreshments

[CRF 248.12](#)—FMNP costs

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 “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 All program expenses should be able to withstand review, audit, and public scrutiny for appropriate expenditure of public funds. Necessary costs must be covered before using federal funds for incentive purposes.
- 2.0 Program incentive items purchased with federal funds must meet the guidelines below:
 - 2.1. The item(s) reinforce a WIC outreach, nutrition education, or breastfeeding message or concept.
 - 2.1.1. The item must have a WIC logo or have a WIC outreach, nutrition education, or breastfeeding message.
 - 2.1.2. Outreach items may contain clinic contact information or an agency website.
 - 2.1.3. The item may also contain an agency logo.
 - 2.2. Include the program or educational information on printed materials.
 - 2.3. Fit the definition of a reasonable and necessary cost.
 - 2.4. Be intended for use by participants, potential participants, or persons providing outreach or referral services to promote WIC.
 - 2.5. Be culturally appropriate for the target population in both language and symbolism.
 - 2.6. 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.
 - 2.7. If incentive items are donated, (*i.e.*, not purchased with WIC funds) they should meet the requirements outlined in this policy in order to convey consistent outreach, nutrition education and breastfeeding messages, and they cannot be branded with any logo other than WIC's.
 - 2.8. Whenever possible, purchase multi-use, sustainable, and locally produced products.

Inappropriate Items

- 2.8.1. 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 to babies and young children.

Outreach

- 3.0 Incentive items for promoting **outreach** should:
 - 3.1. Have high exposure among the target audience.

- 3.2. Include the WIC logo, if there is room on the item.
- 3.3. Include the nondiscrimination statement or the alternative format statement (refer to ♦ [452—Civil Rights](#)) for printed materials.
- 3.4. Contain a WIC-specific message that targets the potential eligible population.
- 3.5. Include WIC contact information or program website.
- 3.6. Examples of appropriate outreach incentive items include, but are not limited to:
 - T-shirts
 - Buttons
 - Bibs
 - Toothbrushes
 - Pens
 - Magnets
 - Fruit or veggie temporary tattoos or stickers
 - Water bottles

Nutrition Education

- 4.0 Incentive items for promoting **nutrition education** must:
 - 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.
 - 4.4. Examples of appropriate nutrition education incentive items include, but are not limited to:
 - Calendars with nutrition education messages
 - Water bottles
 - Items that support oral health (toothbrushes, floss),
 - Fruit and vegetable stickers

Breastfeeding Promotion

- 5.0 Incentive items for promoting **breastfeeding** will convey information encouraging and supporting breastfeeding.
 - 5.1. Examples of appropriate breastfeeding promotion incentive items include, but are not limited to:
 - T-shirts with a breastfeeding message

- Buttons with a breastfeeding slogan
- Water bottles

Breast pumps and breastfeeding aids

- 5.2. 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

- 5.3. 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.

Limited Provision of Meals and Refreshments

- 6.0 Ensure that funding is available for all required program functions, especially nutrition education, before considering the purchase of meals or refreshments.
- 6.1. In limited situations, meals and refreshments may be provided when a meeting is held over a normally scheduled meal period and the meeting is at least 3 hours long. Participants may include staff, but only those essential for the conduct of business. Documentation must include a sign in sheet and agenda. Potential examples:
- 6.1.1. Health fair participant nutrition education event that needs to be scheduled over a number of hours or mealtime to accommodate partners and participant schedules.
- 6.1.2. Lengthy training (e.g. over 4 hours) that requires scheduling over a meal break to accommodate staff schedules.

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alternate format, please call 971-673-0040.**

This institution is an equal opportunity provider.

POLICY HISTORY

| Date | * Major Revision, Minor revision |
|-----------|----------------------------------|
| 6/16/2017 | Revision |
| 8/18/2020 | Minor revision |
| 7/1/2025 | Major Revision |
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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