

Policy 712

Breastfeeding: Pump Ordering, Distribution and Tracking Guidelines

July 15, 2024 (Revised)

POLICY

Local WIC programs may provide pumps to WIC participants when appropriate and as pumps are available.

PURPOSE

- 1. To provide support and education on the appropriate use of pumps.
- 2. To protect breastfeeding for parents who need pumps for medical reasons.
- 3. To assist parents who are separated from their babies for work, school, or other reasons.
- 4. To provide procedures for the appropriate management of pumps, including the ordering of pumps through the state purchasing program and online in-state shopping application called Shopify, distributing pumps to participants, maintaining pump inventories, and complying with state requirements.

RELEVANT REGULATIONS

§246.14 ¶(c)(10)—Breastfeeding aids as an allowable administrative expense

ASM 99-92—Pumps as food cost

ASM 94-107—Direct/Indirect Breastfeeding Aids

ASM 95-138—Providing pumps to WIC participants

OREGON WIC PPM REFERENCES

- ◆ 215—Local Program Monitoring and Review
- ♦ 426—Record Retention Period
- ◆ 710—Breastfeeding: Definition, Promotion and Support Standards
- ♦ 713—Breastfeeding: Use of Supplemental Formula
- ♦ 880—Referrals

DEFINITIONS

App Support: State WIC data system user assistance.

Business & Administration Services Team (BAST) Administrative Specialist: State WIC program staff assigned to handle state purchasing processes.

Pump: A device to help remove milk from the breasts.

Double pumping accessory kit: The parts of a pump that touch the breast, collect milk, and attach to the double electric pump.

Flange: Circular cup attachment that fits on the breast and connects with tubing to the pump, sometimes called a *breast shield*.

Manual pump: A pump that is operated by squeezing or pulling a handle in a repetitive fashion, allowing the user to directly control the pressure and frequency of milk expression.

Multiuser double electric pump: An electric pump that is intended for multiple users over several years. It is powered by a motor that supplies suction for pumping both breasts at the same time. Previously called *hospital grade double electric pump*.

Oregon WIC Pump Handbook for Local Agencies: This important resource provides additional information on Oregon WIC's pump program, including detailed procedures for ordering, distributing, cleaning, and disposing of pumps. All staff trained to provide pumps need to be familiar with the information in this document.

Single-user double electric pump: An electric pump that is intended for an individual user. It is powered by a motor and supplies pressure to pump one breast or both breasts at the same time.

BACKGROUND

Breastfeeding is a major component of the WIC program. While feeding infants directly from the chest/breast provides the greatest health benefit to both the parent - and infant, pumps are useful tools when participants choose not to feed at the breast, when parents and babies are separated, or when a medical condition interferes with effective breastfeeding. WIC staff are required to instruct participants on how to safely and effectively use a pump whenever it is provided.

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PROCEDURE

Pump program staffing

- 1.0 The local agency WIC Coordinator and Breastfeeding Coordinator shall work together to authorize and train local agency staff to appropriately assess and issue pumps to participants.
 - 1.1. Each local program shall designate one staff member as the **Pump Coordinator** for the agency. This individual will be the primary contact person for overseeing pump program responsibilities, ordering new pumps and accessories, tracking pump inventory, and complying with program requirements.
 - 1.1. Staff who are authorized to issue pumps are expected to assess a participant's need for a pump, know how to assemble, and use all WIC pumps, and cover key education messages on how to maintain milk production and store human milk safely.

Ordering pumps

- 2.0 Pumps and accessories are ordered through a centralized process at the State Agency.
 - 2.1. The State Agency assists each local agency with establishing an inventory of pumps and related pumping accessories, appropriate to meet the agency's needs.
 - 2.2. Inventory levels should be monitored by the local agency at least 3 times a year before a pump order is placed.
 - 2.3. The types of pumps and accessories that are available through the state purchasing program include multi-user pump kits, single user double electric pumps, manual pumps and related accessories. New multi-user pumps are no longer available for purchase, but the State Agency does have a supply of previously purchased pumps on hand that are available to local agencies that can be ordered on Shopify. https://oregon-wic.myshopify.com/. Specific product details are described in the Oregon WIC Pump Handbook for Local Agencies. Under ordering and receiving pumps.
 - 2.4. Pump orders from the State WIC pump contract will be processed three times a year (March, July and November) for delivery the following month. Local agencies can choose to make direct orders with the State WIC pump contract manufacturer outside of this schedule; however, the local agency would be responsible for purchasing and shipping costs. Local agencies may also order products from Oregon WIC Shopify at any time.
 - 2.5. Pump orders are placed electronically. The BAST Administrative Specialist will email a link to the applicable *Pump Order Form* to Pump Coordinators to complete by a specified due date. Agencies are generally given a 2-week window to place an order.
 - 2.6. Pumps and accessories will be shipped directly to the local program. When the order is received, two actions are required **within 7 days**:

- 2.6.1. Inspect order for damage and to ensure that the correct type and quantity of items have been received. If the order is damaged or incorrect, contact the BAST Administrative Specialist right away for directions on how to correct the situation.
- 2.6.2. Scan and email the packing slip to the BAST Administrative Specialist and State Breastfeeding Coordinator. This notification is essential for the billing process. Invoices cannot be paid until packing slips are received.

Pump Inventory

- 3.0 Local programs must document the issuance of pumps.

 - 3.2. Manual pumps and multiuser pumping kits must be entered in the WIC data system.
 - 3.3. Pumps shall be entered in the inventory within **10** working days.
 - 3.4. Accurate information must be entered into the WIC data system to ensure that the reports that are generated are correct. If local staff have problems entering information about pumps and pump accessories into the data system, contact App Support for assistance.
 - 3.5. Pumps shall not be issued to participants until they are entered into the Pump Inventory in the WIC data system.

Pump Storage

4.0 All pumps are to be stored in a location onsite that ensures their security and is locked.

Pump Assessment

- 5.0 Only a Competent Professional Authority (CPA) who has completed level 3 of the Food & Nutrition Services (FNS) breastfeeding training may issue pumps. See the *Oregon WIC Pump Handbook for Local Agencies* for specific training details:
 - 5.1. Pumps shall be provided to participants only after a thorough breastfeeding assessment to ensure that a pump is the preferred intervention.
 - 5.1.1. Providing pumps to participants who do not need them can interfere with breastfeeding.
 - 5.2. The CPA's assessment will include reasons *why* a pump is needed, and *which type* of pump is appropriate to meet the participant's needs.
 - 5.2.1. The *Breast Pump Assessment* in the WIC data system is useful in making this determination.
 - 5.3. Information on providing education about *how to use* the pump, if issued, can be found in section 7.0. Further details are available in the <u>Oregon WIC Pump</u> Handbook for Local Agencies.

5.4. Careful assessment and education must occur before issuing a pump to a participant using legal substances that may be harmful during breastfeeding, such as alcohol, recreational, medical marijuana, or certain medications or herbs. Refer participant to WIC Designated Breastfeeding Expert or health care provider. See ◆710- Breastfeeding: Definition, Promotion and Support Standards, ◆880 - Referrals, and the Oregon WIC Pump Handbook for Local Agencies for more information.

Circumstances when pumps may NOT be issued.

- 6.0 Participants who do not meet the specific criteria established by the State Agency may **not** be issued a pump:
 - 6.1. Pumps may not be issued to pregnant participants.
 - 6.2. Pumps may not be provided to breastfeeding participants solely as an inducement to consider or to continue breastfeeding.
 - 6.3. Pumps may not be issued to participants who do not meet the criteria identified in sections:
 - ¶ 8.0 Loaning Multi-User Double Electric Pumps
 - ¶9.0 Providing Single-User Double Electric Pumps
 - ¶10.0 Providing Manual Pumps

Pump Education

- 7.0 All participants who receive a pump will be instructed on how to assemble and effectively use it.
 - 7.1. Local programs may count pump education that occurs after the certification visit as the participant's quarterly nutrition education contact.
 - 7.2. Individual or group education may be used for participants who are returning to work or school.
 - 7.3. Education for participants who receive any type of pump from WIC is to include information on pump assembly, use and cleaning, safe storage of human milk, maintenance of milk production, and the participant's plans for pumping. More detailed information can be found in the Oregon WIC Pump Handbook for Local Agencies.
 - 7.4. Offer electronic and/or written educational materials to the participant as needed.

Loaning Multi-User Electric Pumps

8.0 Local programs can choose to keep multiuser electric pumps on site. Multi-user electric pumps may not be issued until after the baby is born and are usually issued for a short time frame, generally two to three weeks, although exceptions are made when individual situations require longer timeframes and pumps are available. Participants who only provide their expressed milk to their infant and who do not intend to feed at the chest or breast, can be issued either a multiuser or single-user pump if they do not qualify for one from their health insurance.

- 8.1. The double pumping accessory kits for the multi-user electric pump may not be **loaned or shared**, due to the possibility of cross-contamination.
- 8.2. When a participant is issued a multi-user electric pump:
 - 8.2.1. Complete the *Multi-User Electric Pump Loan Agreement*, ensuring all information is entered.
 - 8.2.2. Loan agreements must be maintained for **three years after the last service**, according to ♦426 Record Retention. Offer a *copy* of the form to the participant.
 - 8.2.3. Enter the pump information, alternate contact and return date into the WIC data system.
 - 8.2.4. Contact the participant within 48 hours to assess if further assistance is needed. Document the contact or attempt on the *Multi-User Electric Pump Loan Agreement*, in the WIC data system or on a local agency pump tracking form (can be paper or electronic).
 - 8.2.5. Refer to the Breast Pump Handbook for more information about issuing multi-user pumps.

Issuance of Single User Electric Pumps

- 9.0 Local programs may give a single-user electric pump to a WIC participant who is separated from their infant for a variety of reasons, provided they meet the qualifying criteria.
 - 9.1. Single-user electric pumps may be issued to a WIC participant in one of the following situations:
 - 9.1.1. The participant cannot get a pump through their insurance provider or the pump they received from their insurance provider is damaged or broken.
 - 9.1.2. Participant or infant has a medical or non-medical need for a pump and either the agency or the participant prefers to receive a single-user pump instead of a multi-user pump loan.
 - 9.1.3. Participant is separated from their baby due to work or school, and is unable to feed their baby while away.
 - 9.1.4. Participant is exclusively breastfeeding their baby or is planning to provide their baby with the participant's expressed milk as fully as possible and is actively working towards that goal.
 - 9.1.5. Participant does not anticipate needing a full formula food package from WIC and is planning to provide the participant's milk for several months to a year or longer.
 - 9.1.6. The participant and baby have established human milk feeding and are not experiencing problems with breastfeeding that would be intensified with use of a single-user pump.

- 9.2. Local programs may tighten these requirements if only a limited number of single user electric pumps are available, but the restricted policy must be approved by their nutrition consultant.
- 9.3. If a participant requests formula after a single-user electric pump has been issued, encourage them to speak with a staff member trained in breastfeeding support who may assist them. If it is determined that formula will be issued, the trained staff member will determine the appropriate amount. See □713—Breastfeeding: Use of Supplemental Formula.
- 9.4. Special circumstances do occasionally arise when the provision of a single-user electric pump may be needed, but policy is not clear on the matter. Contact your local agency designated breastfeeding expert (DBE), WIC RDN/nutritionist, state nutrition consultant or the state breastfeeding coordinator for authorization prior to pump issuance and if approved, document circumstances in the WIC data system.
- 9.5. When a participant is issued a single-user electric pump:
 - 9.5.1. Complete the *Pump Release Form*, ensuring that all the blanks are filled in.
 - 9.5.2. Retain the form for three years after the last service, according to ◆426—Record Retention. Offer a *copy* of the form to the participant.
 - 9.5.3. Help the participant fill out the warranty sticker template provided on Shopify. Fill out the date the pump was issued, contact information for customer service and the amount of time the pump is under warranty.
 - 9.5.4. Contact the participant within 48 hours to assess if further assistance is needed. Document the contact on the *Pump Release Form*, in the WIC data system or on a local agency pump tracking form (can be electronic or paper)
 - 9.5.5. Refer to the Breast Pump Handbook for more information about issuing single-user pumps.
 - 9.5.6. Inform the participant the single-user electric pump should not be shared with others, and that they cannot loan or sell this pump. When the participant is finished with the single-user pump, *it should be recycled or discarded* rather than sold or given away.
- 9.5 Instances when local agencies may replace single user pumps:
 - 9.5.1 If a fully breastfeeding participant brings back a WIC-issued pump during the first year that is broken, or is no longer working effectively, replace it with another single-user pump. If the broken pump is still on warranty, the participant should work with the manufacturer to get the pump fixed or replaced. Any exceptions to these requirements must be authorized with the State Pump Coordinator prior to pump issuance and if approved, the circumstances need to be documented in the WIC data

- system. See the <u>Oregon WIC Pump Handbook for Local Agencies for</u> more details.
- 9.5.2 If a fully breastfeeding participant reports or returns a WIC-issued pump that is no longer working due to long term use, e.g. participant has exclusively breastfed and pumped during work hours for multiple infants. Document situations in the WIC data system.
- 9.5.3 If a fully breastfeeding participant reports that their WIC-issued pump has been lost or damaged due to domestic violence, emergency, or natural disaster, the pump can be replaced. Document the situation in the WIC data system.
- 9.5.4 If a fully breastfeeding participant reports or brings in a non-WIC pump during the first year that is broken, not working effectively, or is lost or damaged due to domestic violence, emergency or natural disaster, replace this pump with a WIC single-user pump and provide guidance on its use and care. Document the situation in the WIC data system.

Providing Manual Pumps

- 10 Local programs may provide manual pumps to participants who have occasional need to pump.
 - 10.5 Oregon WIC offers both one-handed and two-handed manual pumps. Determine which style of manual pump is most appropriate for the participant.
 - 10.6 For a participant without access to electricity who is committed to breastfeeding and is willing to use a manual pump when they are separated from their infant to work or attend school, *two* one-handed breast pumps may be issued for double pumping, if appropriate.

Recovery of Multi-User Electric Pumps

- 11 Local programs will make a reasonable effort to retrieve multi-user electric pumps that have not been returned by the date specified in the *Multi-user Electric Pump Loan Agreement*.
 - 11.5 Local programs will document attempts to retrieve these pumps.
 - 11.6 If a participant fails to return a pump by the due date, the local program shall:
 - 11.6.1 Attempt to contact the participant (or alternate contact, if necessary) by phone within seven days of the pump return due date.
 - 11.6.2 Mail a letter instructing the participant to return the pump. Sample Letters can be downloaded in English and Spanish from the Breastfeeding Resources for WIC Staff page. Keep a copy of the letter for your records.
 - 11.6.3 Enter a note in the participant's record in the WIC data system, documenting efforts to recover the pump.
 - 11.7 If efforts to retrieve a pump are not successful, the State Agency shall assist local staff to attempt recovery of the pump. Unreturned pumps are considered lost or stolen. The state office has the option of requesting that the participant reimburse

WIC for the replacement cost of a lost multi-user electric pump. The process of recouping funds shall be done by the State office.

- 11.7.1 If the participant fails to return the pump within 30 days after the letter was mailed, refer the matter to the State Agency. Follow the procedure described in the *Oregon WIC Pump Handbook for Local Agencies* and document the referral in the WIC data system.
- 11.7.2 Send a copy of the letter your agency mailed to the participant, and a copy of the *Multi-user Electric Pump Loan Agreement* to the State Agency Compliance Investigator to pursue collection efforts.
- 11.7.3 The State Agency Compliance Investigator may initiate the process of billing the participant for the value of the pump.
- 11.7.4 If the participant contacts the local program to make payment after the state has issued a bill for the pump, refer them to the State Agency Operations Manager for payment arrangements.
- 11.7.5 Upon return of the pump, have the participant sign and date the bottom of the *Multi-User Electric Pump Loan Agreement*. The local program shall also enter the pump return date in the data system, and must contact the State Agency Operations Manager to halt collection procedures.
- 11.8 If a pump is returned to a local program other than the one that loaned the pump, the local program that received the pump shall contact the local program that issued the pump to decide how to return the pump. The receiving local agency may not keep the pump. Contact the state agency regarding any transport questions.
- 11.9 If a pump is lost by the local program (not by a participant), contact the State agency. State staff can note this situation in the WIC data system.
- 11.10 Local staff shall contact the State Agency immediately if they learn that a participant has transferred out-of-state without returning a multi-user electric pump.
- 11.11 According to federal regulations, local programs cannot withhold or deny WIC benefits, transfer documentation, or other services from a participant who has not returned a pump.

Cleaning Multi-User Electric Pumps

- All multi-user electric pumps that have been loaned to participants are to be cleaned and checked for performance upon return and before re-issuing the pump to another participant.
 - 12.5 Document the date of the pump's return in the participant's record in the WIC data system .
 - 12.6 Clean the returned pump by following the manufacturers recommended cleaning instructions which can be found in the <u>Oregon WIC Pump Handbook for Local Agencies</u>. Consider printing and laminating this step-by-step guide and displaying

- it in the area where multi-user electric pumps are cleaned to ensure that all staff members are following the same procedure.
- 12.7 Multi-user electric pumps that become infested while on loan to a WIC participant must be returned to the manufacturer for professional cleaning if allowable or discarded at the local level. Contact the State Agency for assistance. If the State Agency determines that the pump can be returned to the manufacturer for professional cleaning, follow the instructions on returning infested pumps found in the *Oregon WIC Pump Handbook for Local Agencies*.
- 12.8 After a pump has been cleaned, use a pump gauge to assess its function by following the instructions in the <u>Oregon WIC Pump Handbook for Local Agencies</u>.
- 12.9 Do not clean and re-use multi-user pump kits, manual pumps or single-user double electric pumps (unless manufacturer states that it is safe to do so). Re-use is not recommended because of the possibility of cross-contamination. If such items are returned to the local program, they should be discarded (unless manufacturer specifically states that re-use is safe).

Distribution of WIC Pumps by a Third Party

- Local programs have the option of establishing partnerships with entities such as hospitals, community clinics, or community health nurses, to distribute WIC pumps to WIC participants. Such arrangements must be approved by the State Agency and meet the criteria below.
 - 13.5 Specific contact persons from both the local agency and the third party will be identified.
 - 13.6 A signed written agreement outlining the responsibilities of each party and the time frame it covers is current and on file.
 - 13.6.1 Sample Agreements can be downloaded from the Breastfeeding Resources for WIC Staff page:
 - 13.7 Local programs will provide training to all third-party staff who will be issuing pumps.
 - 13.8 A system for obtaining, distributing and tracking pumps is in place to prevent fraud or loss.
 - 13.9 Pumps purchased with WIC funds are issued only to current WIC participants, by appropriately trained staff.
 - 13.10 All WIC pump policies are followed.

Pump Repair / Warranty Service

- Pumps are covered under warranty for a set time and may be returned to the manufacturer if they are found to be defective or in need of repair after the initial sevenday inspection period but before the warranty period has expired.
 - **14.1** Warranty periods for the pumps are:
 - Hygeia Evolve and/or Hygeia Pro 1 year
 Multiuser pump kit-Hygeia Personal Accessory Set (PAS) 90 days

Hygeia 1-handed and 2-Handed Manual Pumps – 90 days

The warranty period has expired for **all** Medela products, including the Lactina multi-user pump, the Lactina double pumping accessory kit, the Pump in Style single-user pump, and the Harmony one-handed manual pump. The warranty period has also expired for the Hygeia EnDeare pumps since this pump is no longer being manufactured. Neither of the multi-user pumps used by Oregon WIC are under warranty.

- 14.2 All warranty periods start at the date of issuance to the participant, which is documented by the WIC data system.
- 14.3 Participants should work with the manufacturer regarding the warranty service. If the local agency or participant needs assistance with this process, they can contact the State Pump Coordinator. Detailed instructions are in the <u>Oregon WIC Pump Handbook for Local Agencies</u>.
- 14.4 Pumps that are broken or not functioning to standards that are not on warranty will be disposed of by the local program. Document the removal of the pump from service in the WIC data system.

Re-use or Sale of Pumps

- 15 The re-use or sale of WIC pumps are not allowed. Participants may not profit from the sale of any pump provided by WIC.
 - 15.5 Multi-user electric pumps are loaned to WIC participants and are not to be sold for personal gain. If a pump is not returned, the WIC participant is liable for the cost.
 - 15.6 Single-user electric pumps are given to WIC participants for their use only. Selling the pump when no longer needed is not permitted.

Disposal / Recycling of Pumps

- 16 Pumps that no longer work, are not repairable and are not under warranty may be disposed of by the local program. This includes multi-user electric pumps and single-user electric that have been returned to the agency.
 - 16.5 If the pump will be disposed of by the local program:
 - 16.5.1 Remove any parts that can be salvaged and reused (case, clips, strap, knobs, etc.), and discard the rest, preferably in a dumpster to which the public does not have access. Consider using permanent marker to write "Broken" on the pump or pump case to discourage others from trying to salvage it.
 - 16.5.2 When a multi-user electric pump is no longer useable, change the status of the pump in the WIC data system. See the *Oregon WIC Pump Handbook* for Local Agencies for further details.
 - 16.6 Pumps that are broken and beyond the warranty period may be recycled, rather than discarded, if such service is available in your local area. See the *Oregon WIC Pump Handbook* for Local Agencies for more details.

16.6.1 Do not send broken pumps to the State Agency for recycling unless directed to do so.

Transfers

- Local program staff shall request the return of a multi-user electric pump before a participant transfers to a different location within the state of Oregon. If the participant does not comply, or if the participant transfers without notifying the agency, staff at the previous agency shall notify the participant's new agency about the unreturned multi-user electric pump.
 - 17.5 Staff transferring in a participant who has not returned a multi-user electric pump loaned to them by the previous agency shall assist with continued pump recovery attempts. Recovered pumps are to be returned to the original agency.
 - 17.6 Local program staff shall contact the State Agency immediately when they learn a participant has transferred out of the local agency with a multi-user electric pump. State staff will assist in identifying the participant's new agency.
 - 17.7 Local program staff who become aware that a participant who has transferred to Oregon from another state has a multi-user electric pump from the previous state, shall attempt to recover that pump and return it to the state where it originated. Contact the State Agency for assistance if needed.
 - 17.8 Multi-user electric pumps are on loan to the participant and are not to be taken out of Oregon. Local staff shall contact the State Agency immediately if they learn that a participant has transferred out-of-state without returning a multi-user electric pump.
 - 17.9 According to federal regulations, local programs cannot withhold or deny WIC benefits, transfer documentation, or other services from a participant who has not returned a pump.

Compliance Requirements

- 18 Local agency pump programs will be monitored onsite every two years as part of the biennial review process.
 - 18.5 The reviewer will evaluate compliance with pump policies and procedures around issuance and tracking.
 - 18.6 Further information on review procedure and a copy of the WIC review tool is available on the Oregon WIC website at:

 https://www.oregon.gov/oha/ph/HealthyPeopleFamilies/wic/Pages/wic-coordinator.aspx

Fiscal Management

- 19.0 All costs for the management of the pump program are to be charged to the local WIC Nutrition Services Administration (NSA) grant, including the following:
 - Staff time for management of the pump program
 - Space to store pumps
 - Maintenance and cleaning costs, including shipping fees
 - Participant education

- 19.1 Multi-user electric pumps *ordered through the* **State** *purchasing program* may not be sold to participants, hospital partners, or other entities.
- 19.2 Single-user electric pumps, manual pumps, and multiuser pump electric accessory kits *ordered through the* **State** *purchasing program* shall be given to participants free of charge.
- 19.3 Local programs may purchase pump supplies and/or breastfeeding aids in addition to the products available through the state purchasing program. These items must follow federal policy guidelines for such expenditures, and costs are to be allocated to the WIC NSA grant.
 - 19.3.1 If local agencies are purchasing supplies in addition to the products available through the state purchasing program, they must have a policy on file that explains who is distributing these products, what kind of education is given to the participant and how the local agency plans to document distribution of these products. This policy needs to be approved by the State Breastfeeding Coordinator.

REFERENCES

- 1. Breastfeeding Resources for WIC Staff: https://www.oregon.gov/oha/ph/HealthyPeopleFamilies/wic/Pages/breastfeeding.aspx
- 2. Oregon WIC Pump Handbook for Local Agencies https://www.oregon.gov/oha/ph/HealthyPeopleFamilies/wic/Documents/bf/breast-pump-handbook.pdf

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

This institution is an equal opportunity provider.

POLICY HISTORY

Date	* Revised, Reviewed, Released
10/5/2018	Released
07/15/2024	Revised

The date located at the top of the policy is the date of the most recent release. Policies are to be implemented on release date and will become compliance findings 6 months from the release date.

*Released: Significant changes made to policy. Release notes can be found in the corresponding document on the <u>Policy and Procedure Manual page</u>.

Reviewed: The writer looked at this policy to make sure it was still accurate. Formatting changes may have occurred.

Revised: Minor edits or formatting has occurred without need for release. USDA has accepted a policy and watermark is reviewed.

Date of Origin: Date policy was initially released