

MI-WIC POLICY

Administration

11.0 Fiscal Administration

Effective Date: 05/16/2019

11.02 Program Incentive Items

PURPOSE: Provide direction regarding the purchase of nutrition, breastfeeding, and outreach incentive items using WIC nutrition services and administration funds (NSA).

DEFINITIONS: Refer to MI WIC Policy 11.01 Program Cost

A. POLICY

1. Program Incentive items refer to a class of goods, usually of a nominal value, that are given to applicants, clients, potential clients, or persons closely associated with the WIC program (such as staff) for the purpose of outreach, nutrition education, or breastfeeding promotion.
2. Incentive items are allowable under certain terms and conditions if they are considered to be a reasonable and necessary cost.
 - a. A reasonable cost:
 - i. Provides a benefit to the program or program goals appropriate to the cost incurred,
 - ii. Is comparable with the cost of similar items from other vendors;
 - iii. Has high priority when compared to other needs for which administrative funds could be used;
 - iv. Has a proven or reasonably expected outcome related to outreach, nutrition education, or breastfeeding promotion.
 - b. A necessary cost:
 - i. Is one that is incurred to carry out essential program functions and cannot be avoided without adversely impacting program operations.
3. Program incentive items for outreach shall:
 - a. Include a WIC specific message that targets the potentially eligible population.
 - b. Be seen in public.
 - c. Include the FNS WIC approved nondiscrimination statement for printed materials that contain WIC information.
 - d. Have a value as outreach devices that equal or outweigh other uses.
 - e. Contain WIC contact information such as the State or local agency name, address, and/or telephone number.
 - f. Include an innovative or proven way of encouraging WIC participation.
4. Program incentive items for nutrition education shall:
 - a. Be targeted to clients.
 - b. Include an FNS WIC approved nondiscrimination statement for printed materials that contain WIC information.

- c. Be a clear and useful connection to particular WIC nutrition education messages.
 - d. Convey enough information to be considered educational or be utilized by clients to reinforce nutrition education contacts.
 - e. Have a value as nutrition education aids that equal or outweigh other uses.
 - f. Be distributed to the audience for which the items were designed.
5. Program incentive items for breastfeeding promotion and support shall:
- a. Include the FNS WIC approved nondiscrimination statement for printed materials with WIC info.
 - b. Be a clear and useful connection to promoting and supporting breastfeeding among current WIC clients.
 - c. Convey information that encourages and supports breastfeeding or offers support and encouragement to women to initiate and continue breastfeeding.
 - d. Have a value as breastfeeding promotion and support items that equal or outweigh other uses.
 - e. Be distributed to the audience for which the items were designated.
6. All program incentive items shall:
- a. Be intended for use by clients, potential clients, of persons providing outreach or referral services to promote WIC.
 - b. Be culturally appropriate for the target population in both language and symbolism.
7. Unallowable items include, but are not limited to:
- a. Celebratory items, or items designed as staff morale boosters, generally for the personal use of the staff, with minimal public display.
 - b. Items of nominal value which have no outreach, breastfeeding, or nutrition education message.
 - c. Any program incentive item intended for persons who are not clients, potential clients or their parents/guardians, or for persons with no connection to the WIC program, such as staff and cooperation agency representatives.

References:

Federal Regulations 7 CFR 246.14 Program costs
FNS WIC Breastfeeding Policy and Guidance, July 2016
USDA Policy memo #95-5 Allowability of Costs for Program Incentive Items
USDA Policy memo #MWSF 95-4

Cross References:

1.09 Civil Rights
11.01 Program Costs