

Breast Pump Inventory Control

Policy

USDA Federal Regulations: 246.25(a) Recordkeeping requirements. Each State and local agency shall maintain full and complete records concerning Program operations. Such records shall comply with 2 CFR part 200, subpart D and USDA implementing regulations 2 CFR part 400 and part 415 and the following requirements: (1) Records shall include, but not be limited to, information pertaining to financial operations, food delivery systems, food instrument issuance and redemption, equipment purchases and inventory, certification, nutrition education, including breastfeeding promotion and support, civil rights, and fair hearing procedures.

Authority

7 CFR Part 246.25(a)(1)

Procedures

The purchase, distribution and recovery of breast pumps should be managed like any other type of agency procurement in order to prevent theft or unauthorized use or distribution.

- All pumps, collection kits **and pump accessories** should be stored in an area or cabinet that can be locked when local agency personnel are not present.
- All new pumps, collection kits **and pump accessories** should be stored in unopened packaging, as received from the manufacturer.
- **Local agencies must have a procedure in place** for retrieving pumps that are lost, stolen, or otherwise not returned.
- Copies of invoices or bills for all breast pumps, collection kits **and other pump accessories** should be maintained in agency files. They must be compared to physical inventory, the Breastfeeding Equipment Due report and the Breastfeeding Equipment Issued report available in the WIC data system once a year at minimum.

Follow these steps when retrieving a WIC-owned electric multi-user breast pump:

- Attempt to reach the participant or alternate contact by phone.
- If unable to contact by phone, send a certified letter to the participant. Notify the participant if the breast pump is not returned promptly, local authorities may be contacted.
- If the breast pump is still not returned or if the certified letter is undeliverable, notify the State WIC Program Integrity Coordinator for assistance and direction via the online Iowa WIC Program Fraud and Abuse Reporting Form **located here** <https://hhs.iowa.gov/contacts/wic-fraud-or-abuse>.

If a participant moves out of the local agency service area while in the possession of a loaned, WIC agency-owned multiuser electric breast pump, the following steps should be taken:

- The local agency where the participant moved from should contact and work with the client and the new agency to make arrangements for getting the pump returned.
- If the client is still in need of a pump, the new agency will make arrangements for the client to receive one of their pumps.

Note: It may not be feasible for the client to return the breast pump to the old agency, in which case the new agency must mail or make other arrangements to get the pump back to the original agency on the participant's behalf.

Best Practices

The Breastfeeding Equipment Due and Breastfeeding Equipment Issued Reports available from the WIC data system can be used to manage the inventory.

Local WIC agencies are encouraged to have a policy that identifies:

- Staff members who are responsible for cleaning, disinfecting, and maintaining breast pumps, and
- the recommended maintenance schedule.

Pumps returned to the agency damaged should be repaired by the pump company at no cost to the participant if the local agency determines it to be cost effective based on the replacement cost of a new pump.