



Five Simple Steps to Create and Implement a Breastfeeding Policy in the Workplace

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Connected. Credible. Committed.

The **Bravado Breastfeeding Information Council (BBIC)** was formed in 2009 by Bravado Designs to disseminate timely, accurate and non-judgmental information on breastfeeding-related topics to the media, industry and key influencers.

With leading-edge data built from an extensive database of more than 80,000 nursing women and an expert advisory board consisting of the best brains in breastfeeding, the BBIC supports a positive breastfeeding experience for all women in North America. The first of its kind, the BBIC is connected, credible and committed.

The Federal Healthcare Reform Act signed by President Obama in March 2010 requires companies of more than 50 employees to support nursing mothers who would like to express breast milk at their place of work up until the child's first birthday.

*President Obama signed the **Patient Protection and Affordable Care Act, H.R. 3590**, on March 23rd and the **Reconciliation Act of 2010, H.R. 4872**, on March 30, 2010. Among many provisions, the law amends the Fair Labor Standards Act of 1938 (29 U.S. Code 207) to require an employer to provide reasonable break time for an employee to express breast milk for her nursing child for one year after the child's birth each time such employee has the need to express milk. The employer is not required to compensate an employee receiving reasonable break time for any work time spent for such purpose. The employer must also provide a place, other than a bathroom, for the employee to express breast milk. If these requirements impose undue hardship, an employer that employs less than 50 employees is not subject to these requirements. Furthermore, these requirements shall not preempt a state law that provides greater protections to employees.*

Even if your company has less than 50 employees, it isn't complicated or expensive to implement a breastfeeding policy.

The BBIC has prepared this simple, straightforward and practical guide to implementing a breastfeeding policy in your workplace.

For more information on the Bravado Breastfeeding Information Council (BBIC), please visit:
www.breastfeedinginformation.org

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WHAT ARE THE LEGAL REQUIREMENTS FOR A BREASTFEEDING POLICY?

The new legislation requires that companies do the following:

- Have a written breastfeeding policy that is shared with employees
- Provide reasonable break times to mothers of children less than one year old to express breast milk (these breaks do not have to be paid)
- Provide a private place to pump that is not a restroom

These requirements can easily be implemented by any company.

FIVE SIMPLE STEPS TO CREATE AND IMPLEMENT A BREASTFEEDING POLICY IN THE WORKPLACE

Step 1: Identify the Essentials Needed by a Nursing Mother in the Workplace

There are a number of “must haves” to ensure that a nursing mother is successful in continuing to breastfeed when returning to work. These encompass physical amenities, as well as scheduled breaks for pumping. BBIC research conducted in October 2009 identified the four must-haves for a nursing mother in the workplace: a door, a fridge, a sink and a plug.¹⁰ These items already exist in many workplaces.

A DOOR: A private place to pump

- The law states that the private place to pump cannot be a restroom
- It should have a door and, ideally, a lock; try to find an empty office or meeting room, or any other space where the nursing mother won't be disturbed
- Do not use a broom closet, supply closet or furnace room; this does not send a signal of respect or value to your employee
- If you do not have a space that is readily apparent, discuss the options with your staff; someone may have an idea that you have not already explored
- Find a quiet location away from a high traffic or noise
- The room should be equipped with a chair, such as an office chair, and a small table or desk upon which to rest the pump
- Set up a procedure to book the room – this could be in Microsoft Outlook or a sign-up sheet (see Appendix A for a sample sign up sheet); this is particularly important when there are several nursing mothers in the company

A FRIDGE: Access to a cool place to store breast milk

- A bottle or two of breast milk takes up very little room and can easily be stored in the kitchen fridge
- It should be properly labeled to avoid any potential confusion
- Many women like to store their bottles in a paper bag or lunch bag

A SINK: For cleaning breast pump parts

- A woman who pumps several times a day will need to wash her hands and clean pump parts in between sessions
- The kitchen or washroom sink can be used
- It must have hot, running water and soap, as well as towels (paper or clean cloth) for drying hands and pump parts

A PLUG: For plugging in the pump

- Many women use electric breast pumps, which are faster and more efficient than manual ones
- The plug must be located in the private space

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“Stress, noise and interruptions can all affect pumping. The more quiet and relaxing the space, the better and more efficient it is for the nursing mom.”¹¹

Carole Lucia, Contributing Editor, Breastfeeding and Health, Fit Pregnancy

Step 2: Provide Reasonable Breaks for Pumping

The Federal Health Care Reform Act does not define what is legally constituted as a “reasonable break,” as both the frequency and the duration of pump sessions will vary by mother.

In general:

- **Frequency of sessions:** nursing mothers will typically pump two to three times during a typical work day, depending on the age of the baby; at the age of three months, infants typically nurse every 2½ to 3½ hours.
- **Duration of sessions:** as a general rule, it takes approximately 20 minutes to pump plus another 10 minutes to get ready beforehand and clean up afterward; however, this can vary greatly by mother and her experience.¹²
- The frequency and length of sessions are reduced over time as the baby grows and is introduced to solids (around 5 - 6 months of age), and as a mother becomes more efficient.
- You are not required to pay employees for these breaks. Be clear in the breastfeeding policy whether pumping breaks are paid or unpaid.

Step 3: Write a Simple, Straightforward Breastfeeding Policy

A good breastfeeding policy doesn’t need to be complex. It simply needs to include the essentials of how the company supports its nursing mothers. Appendix B has a sample breastfeeding policy template that can be used to develop your own.

The policy should be written in the same tone and voice as your other corporate policies and should:

- Clearly state that the company supports nursing mothers returning to the workplace and that all staff are expected to do the same
- Summarize the legal requirements for complying with the Healthcare Reform Act
- Define or suggest reasonable break times and state whether these are paid or unpaid
- List private places where a nursing mother can pump
- State that the policy will be discussed with nursing mothers prior to their departure on maternity leave
- Provide a means for a nursing mother to lodge a complaint if she feels that she is being harassed or discriminated against because of her decision to pump at work

SIMPLE WAYS TO ENHANCE NURSING IN THE WORKPLACE¹³:

- Mirror
- Bulletin board to share information with other nursing mothers
- Sign up-sheet to reserve the space (or create a “meeting room” in Microsoft Outlook to allow women to reserve the space)
- Reading material
- Music to calm, distract or mask the pumping noise or external noises
- Access to a lactation consultant or program
- Subsidized breast pump
- Pictures of babies

*These are additional benefits you can provide to your employees but are not obligatory

Source: Lindsay Lebresco, Account Director, Converseon, BBIC Advisory Board

“A mother will try and replicate the frequency of her breast emptying while at work with a breast pump. Frequent pumping will allow her to continue to produce breast milk, so that she can provide her baby with expressed breast milk for the following day.”¹⁴
Shery Leeder, IBCLC, BBIC Advisory Board

“Novice pumpers are undertaking something that is new and unfamiliar to them. They have to adjust to the fact they’re expressing their breast milk while their work world swirls around them. This can translate into difficulties relaxing, which can lead to the need for a longer break for pumping, especially in the beginning.”¹⁵
Carole Lucia, Contributing Editor, Breastfeeding and Health, Fit Pregnancy

Step 4: Communicate the Breastfeeding Policy to all Employees

A working mother's nursing success depends on having not just the support of the company, but also that of her colleagues. All staff should understand the breastfeeding policy and what is expected of them. For example, nursing mothers require flexibility when scheduling pumping breaks; if their colleagues are familiar with what is needed, they can readily adapt.

- Explain the new policy in detail to all staff
- Give each employee a copy of the written breastfeeding policy
- Make it clear that all employees are required to provide support and respect a new mother's breastfeeding needs, and that there will be consequences in failing to do so
- Use the policy as an opportunity to demonstrate a commitment and benefit to a very valuable group in the workforce
- Add the new policy into your employee handbook in conjunction with any maternal policies that you may already have
- The policy can be used as part of your recruitment process to highlight to women that you are attentive to their future needs

Step 5: Prepare — Plan your Employee's Return to Work Prior to her Maternity Leave

This is the most critical step of all. For many women, the decision to breastfeed is both personal and private. BBIC research indicates that 53% of working mothers claim that they do not feel the need to discuss their intention to pump with their employer. Of those that do, only 35% initiate the conversation with their employer prior to their maternity leave.¹⁶ Yet, planning ahead ensures greater peace of mind for the employee when she knows that she is supported in her decision to continue to breastfeed after returning to work. It also helps the company prepare for a new mother's return to work.

Here are some helpful tips to ensure the conversation happens:

- Discuss the employee's plans for breastfeeding, including whether she intends to pump when she returns to work and for how long; understand that while plans may be discussed prior to leaving, those plans may change
- If you are not comfortable having this discussion with your employee, find someone who is – perhaps another mother or a colleague with whom she is close
- Provide her with the company's written policy, as well as any other supporting material that you may have to help her prepare for her return to work and a sample policy is included Appendix B
- Listen and have a two-way dialogue – understand that a working mother's needs may vary and some flexibility may be required
- Explain that the company and its staff are fully supportive of the new mother in her choice to continue breastfeeding, and outline the process for filing a complaint about any harassment to which she may be subjected.

Appendix C contains a handout with helpful tips for a new mother returning to work.

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 “If a mother decides to pump at work, acknowledgement of her decision is the most important factor in helping her feel supported when she returns to work. Many women are embarrassed or even frightened to bring up the topic of breastfeeding with both male and female supervisors. Having a policy in place that is discussed BEFORE the maternity leave would be tremendously helpful in setting the stage for a better transition.”¹⁷

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 Lisa Spiegel, M.A., LMHC, Soho Parenting Center, BBIC Advisory Board

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 “It's important that employees communicate with their employers, preferably while still pregnant, and let them know that they intend to pump when they return to work. You want to give your company as much opportunity as possible to come up with a suitable arrangement for you - you don't want to spring it on them that you need a place to pump on your first day back.”¹⁸

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 Carole Lucia, Contributing Editor, Breastfeeding and Health, Fit Pregnancy

CONCLUSION

It is simple and easy to set up a breastfeeding policy for new mothers in your workplace. By following the five simple steps outlined in this white paper, your company will not only be in compliance with the law, it will also be positioned as a firm that values and respects a very valuable part of its workforce: well-trained, experienced employees who have chosen to embark on the journey of motherhood. Women that are fully supported by their workplace in their desire to continue to breastfeed their child demonstrate greater productivity, peace of mind, loyalty and positive feelings toward your company. Simply put, a breastfeeding policy is good business.

Sources:

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- 11 Carole Lucia, Contributing Editor, Breastfeeding and Health, Fit Pregnancy. Personal Interview. May 25, 2010.
- 12 Shery Leeder, Founder of Bravado Designs, IBCLC, BBIC Advisory Board. Personal Interview. June 1, 2010.
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- 14 Shery Leeder, Founder of Bravado Designs, IBCLC, BBIC Advisory Board. Personal Interview. June 1, 2010.
- 15 Carole Lucia, Contributing Editor, Breastfeeding and Health, Fit Pregnancy. Personal Interview. May 25, 2010.
- 16 How a Door, a Plug, a Fridge, and a Sink Increase the Bottom Line. Back to Work and the Breastfeeding Relationship, Bravado Breastfeeding Information Council, Proprietary Research, November 2009.
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- 18 Carole Lucia, Contributing Editor, Breastfeeding Health, Fit Pregnancy. Personal Interview. May 25, 2010.



Lactation Room Sign-up Sheet

Please write your name in the available spaces below to reserve your time in the Lactation Room.

Week of: *insert date*

	Monday	Tuesday	Wednesday	Thursday	Friday
8:30am-8:45am					
8:45am-9:00am					
9:00am-9:15am					
9:15am-9:30am					
9:30am-9:45am					
9:45am-10:00am					
10:00am-10:15am					
10:15am-10:30am					
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3:45pm-4:00pm					
4:00pm-4:15pm					
4:15pm-4:30pm					
4:30pm-4:45pm					
4:45pm-5:00pm					
5:00pm-5:15pm					
5:15pm-5:30pm					

*Note: 15 minute time slots are only a suggestion. Employees can write their names in as many boxes as necessary and as agreed upon internally.

Lactation Policy for Breastfeeding Mothers

The company provides a supportive environment to enable breastfeeding employees to express their milk during work hours. This policy is applicable to mothers of children less than 1 year old, is communicated to all current employees and included in new employee Orientation Package.

We subscribe to the following workplace support policy:

Company Responsibilities

Breastfeeding employees who choose to continue providing their milk for their infants after returning to work shall receive:

Milk Expression Breaks

Breastfeeding employees are permitted unpaid break times to express breast milk during work hours. The duration and amount of breaks can be agreed upon with your supervisor.

A Place to Express Milk

A private room (not a toilet stall or restroom) is available for employees to express breast milk. The room is private and sanitary, located near a sink with running water for washing hands and rinsing out breast pump parts, and has an electrical outlet. If employees prefer, they may also express breast milk in their own private offices, or in other comfortable locations agreed upon in consultation with the employee's supervisor. Expressed milk can be stored in the general refrigerator, but must be properly labeled.

Staff Support

Supervisors are responsible for alerting pregnant and breastfeeding employees about the company's worksite lactation support program, and for negotiating policies and practices that will help facilitate each employee's infant feeding goals. It is expected that all employees will assist in providing a positive atmosphere of support for breastfeeding employees.

Employee Responsibilities

Communication with Supervisors

Employees who wish to express breast milk during the work period shall keep supervisors informed of their needs so that appropriate accommodations can be made to satisfy the needs of both the employee and the company.

Maintenance of Milk Expression Areas

Breastfeeding employees are responsible for keeping milk expression areas clean, using anti-microbial wipes (which are provided). Employees are also responsible for keeping the general lactation room clean for the next user. This responsibility extends to both designated milk expression areas, as well as, other areas where expressing milk may occur.

Milk Storage

Employees should label all milk expressed with their name and date collected so it is not inadvertently confused with another employee's milk. Each employee is responsible for proper storage of her milk.

Use of Break Times to Express Milk

A sign-up sheet is provided by the company. Employees are asked to reserve their times by writing their names in the spaces where they wish to use the private lactation space. If no one has requested the room in advance employees are able to use the space without having to reserve the room.

Optional items to implement in your lactation policy:

Education (OPTIONAL – RECOMMENDED)

The company provides prenatal and postpartum breastfeeding information and resource materials for all mothers and fathers, and their partners. Speak to your supervisor to retrieve this information.

Breastfeeding Equipment (OPTIONAL)

The company provides a hospital grade electric breast pump* to assist breastfeeding employees with milk expression during work hours. This is provided throughout the course of breastfeeding for up to a year of age for your child.

**If using a standard hospital-grade pump, indicate whether the company provides/subsidizes personal attachment kit. If the employee must purchase the attachment kit, indicate where they can purchase the kit.*

APPENDIX C - 12 TIPS FOR NURSING MOTHERS PREPARING TO GO BACK TO WORK



You know the benefits of breastfeeding and are committed to nursing your baby to give him the healthiest start in life. However, if you also are going back to work, you will need to prepare for the world of pumping.

If you are a novice pumper, you are undertaking something new and unfamiliar – not to mention that you are adjusting to being away from your baby. It can take some time to learn to express breast milk while re-entering the workplace.

We have combined Heather Kelly's (IBCLC, BBIC Advisory Board) clinical expertise and knowledge with practical tips from Bravado Designs' CEO Kathryn From and Lindsay Lebresco, (Converseon, BBIC Advisory Board) to help ease your transition back into the workforce.

- 1. Speak to your employer early on:** Talk to your boss, preferably while still pregnant, and let him/her know that you intend to pump when you return to work. You want to give your company as much opportunity as possible to come up with a suitable arrangement for you, and not spring it on them that you need a place to pump on your first day back. If there is no designated area for pumping mothers currently, help your employer by suggesting a space that you think would work and where you would be comfortable pumping. New healthcare legislation requires an employer with more than 50 employees to provide a private space for pumping (not just a restroom) and reasonable breaks for all new mothers, and many smaller companies will happily support your intention to breastfeed and follow suit.
- 2. Be prepared:** Create a specific plan prior to returning to work and share your plan with your partner and caregiver. What are your expectations? How often will you need to express milk? Will there be an effect on your work day? Will you nurse your infant in the mornings and evenings? By thinking through your plan you will reduce your stress about returning to work while continuing to breastfeed. Of course, flexibility is part of any great plan – be prepared to be flexible as your baby's needs change and your work demands change as well.
- 3. Connect with other working mothers:** Working mothers are very willing to share their experiences and are a terrific source of information and ideas. Speak with any mothers in your place of work about their pumping experiences. What worked well, and what would they do differently in hindsight? Other friends and relatives might have insights to share. There are also many forums and information sources online to help you prepare. One helpful website is www.bravadodesigns.com.
- 4. Ease back into full-time:** It can be a big adjustment from caring for your newborn 24/7 to taking on the role of full-time working mother. During the first few days, you will be working out the kinks, learning how to relax while pumping, and generally getting your bearings. A slower re-entry, if your employer is agreeable, can be very beneficial for you, your family, and your place of work. Many employers are open to the initial week being a shorter one, or working shorter days. Some new mothers begin their re-entry on a Wednesday rather than a Monday to make the first week more manageable.
- 5. Practice pumping for a couple of weeks before going back to work:** As with anything, practice does make it easier. If you have been exclusively breastfeeding for a few months, switching to the regular use of a pump can take some time to get used to. Don't be discouraged if you are not an expert pumper your first day; trust us when we say that with a little work you will get the hang of it. Heading back to work with some pumping experience will increase your confidence. For helpful information on breastfeeding, visit www.bravadodesigns.com.
- 6. Build up a 2-3 day supply of milk:** Knowing that you have milk on hand for the first few days will boost your confidence and allow you time to adjust to the reality of pumping at work, as things might not go exactly as you had planned. A buffer supply will help you through the first few days as you establish your pumping routine, and you won't need to feel rushed or have the feeling that your milk supply at home is getting low.

- 7. Practice setting up and cleaning your pump:** Although maintaining clean pump parts is not very time consuming, it can be an adjustment at first. With practice you will quickly become a pro and minimize this time, but you will be much more relaxed at work if you are not trying to familiarize yourself with breast pump parts on your first day back.
- 8. Introduce a bottle to your newborn before going back to work:** Some babies take to a bottle with ease, others not so much. Even if it's just one bottle for a few days leading up to your return to work, knowing that your baby will take a bottle of milk will reduce your stress level and make it easier to return to work. Giving your baby a bottle daily can also help familiarize yourself to the pump, as it is necessary to pump in place of a bottle feeding every time in order to keep up your milk supply.
- 9. Plan ahead:** Many jobs require you to travel for work. With a little practice and confidence, pumping, like nursing, can be done anywhere. If you know you are going to need to travel for work at times, first be sure you have the supplies that will make this easier. Most pumps can be used with batteries if you don't have an outlet available, and some pumps can be plugged in to a car adaptor. If you plan to stay somewhere overnight, call ahead and make sure your room will have a mini-fridge and if not, request one to be brought in. Carry a cover-up – sometimes total privacy isn't available while on the road, and a nursing shawl works just as well for pumping as it does for nursing your baby.
- 10. Remain positive about what you are able to give to your baby:** Returning to work and leaving your baby either at home with a caregiver or in a daycare can be trying to a new mom. Give yourself the time and space to adjust to this learning curve. Breastfeeding (and pumping) can—unfortunately—become the “dumping ground” for all the mixed emotions women experience when they return to work. View your pumping times as a time where you can visualize your baby and “re-connect,” while providing him with sustenance. Bringing milk home in the afternoons or evenings should be a source of tremendous pride for you, and more evidence that you are willing to work to continue to keep this strong bond you have created with your little one.
- 11. Give as much as you can, and be easy on yourself if you need to introduce a supplement:** Some women (not all) experience some lower pumping yields when they return to work. Remember that even if you need to introduce some other sort of supplement, that everything you can give is important. If the baby needs to receive a bottle of an alternative to your own milk, this does not mean that pumping and continuing to keep up this relationship is not worth it. The benefits of breast milk are dose-related: the more, the better. So even if you end up only producing 70% of his daily needs while you are at work, it is still very much worth it!
- 12. Be your own advocate:** Breastfeeding your child is likely a decision you made while you were still pregnant. Be confident about this decision and determine what it will take to make this a reality. No employer, co-worker, child-care provider, etc, is going to ask you what they can do to make your transition back to work easier. It is up to you to decide and vocalize what you'll need to make this very important period in your early family life, a success.