Breastfeeding Family Friendly Communities 203 Oak Glen Place Chapel Hill, NC 27516-7753 EIN: 85-1683518

October 13, 2020

Internal Revenue Service Exempt Organizations PO Box 2508 Clncinnati OH 45201 Fax: 888-981-8671 ATT: Diana Davenport Room 6403 Group 7838

RE: Information Request | FIrst Request

Dear Diana Davenport,

Thank you for your review of our 501(c)(3) application and for the opportunity to respond to additional questions. The responses are included here. All information has been reviewed by the Breastfeeding Family Friendly Communities Board. Please find the documents enclosed with this letter.

Documents enclosed:

- 1. Cover Letter from IRS.
- 2. Declaration and Responses to Information Requested.
- 3. Appendix.

Please let us know if you have any questions Thank you for your time.

Sincerely,

Kathleen L. Anderson Breastfeeding Family Friendly Communities (BFFC) BFFC President and Board Member Phone: 919-624-0230 Email: kathleen@breastfeedingcommunities.org

Responses to Information Request | First Request

 Include the following declaration with your response, signed and dated by an officer, director, trustee or other governing body member (not an authorized representative). You can sign and date the statement below or reproduce it in the body of your signed responses. The declaration must accompany responses per Revenue Procedure 2020-5.

Under penalties of perjury, I declare that I have examined this information, including accompanying documents, and, to the best of my knowledge and belief, the information contains all the relevant facts relating to the request for the information, and such facts are true, correct, and complete.

Kathleen L Anderson - BFFC President/Board Member

Date

2. For Informational Purposes Only: We enclosed a copy of information we obtained from your website and we have added it to your file. Because this information will be available for public inspection as part of your application if you're granted exemption, notify us immediately if it is not about your organization.

The copied information that you have enclosed is correct.

**3.** For Informational Purposes Only: We enclosed a copy of your organizing document from your state of incorporation's website, which is open for public inspection, with this letter and made it part of your file. If you believe this is not a correct copy of your organizing document, please let us know with your response to this letter and submit a copy of the correct document.

The organizing document that you have enclosed is correct.

4. Please provide a more **detailed description of your past, present, and future activities.** In general, you should include:

a. What specific activities you conduct

We provide education, consultation and technical assistance to communities that are interested in completing the *Ten Steps to a Breastfeeding Family Friendly Community* (see Appendix), including supporting the continued efforts of the pilot projects in North Carolina to become Breastfeeding Family Friendly Communities.

Specific activities include:

- Education via virtual meetings (e.g., Zoom or Google Meet) with members of different communities that reach out to us in order to support the implementation of the *Ten Steps to a Breastfeeding Family Friendly Community* by offering how-to information on relevant topics, such as:
  - Building a Breastfeeding Family Friendly Community implementation team.
  - Creating a robust stakeholder group in your community.
  - Providing education on Town/City/County breastfeeding family friendly proclamations and/or lactation policies.
  - Fostering the use of "breastfeeding welcome here" signage throughout the community and in all public and government spaces.
  - Promoting Baby-Friendly Hospital Initiative (BFHI) or breastfeeding friendly clinic initiatives in your community.
  - Bringing together lactation supporters and advocates beyond the hospital setting.
  - Encouraging businesses and community organizations to become breastfeeding family friendly businesses/organizations.
  - Understanding the Code of Marketing of Breast-milk Substitutes.
  - Developing and/or providing curriculum materials (e.g., books) and ideas to normalize breastfeeding for children in the childcare setting or the K-12 school system.
- Technical assistance and consultation through virtual or electronic communication (e.g., Zoom/Google meet, email) to address specific questions from an interested community's implementation team as regards the *Ten Steps to a Breastfeeding Family Friendly Community*.
- Trainings and workshops (virtual at this time, in-person when we are able) for child care providers within the United States (U.S.).
- Offering technical assistance to the North Carolina Department of Instruction on curricula to normalize breastfeeding in the school setting.
- Providing educational and technical assistance on breastfeeding friendly policies and programs to town/city/county municipalities in local pilot projects in North Carolina.
- Educational events (virtual at this time, in-person when we are able) such as health fairs and presentations at business organizations for businesses, organizations, and healthcare providers in local pilot projects in North Carolina.
- Continued communications with local businesses to encourage participation as a breastfeeding friendly business in breastfeeding family friendly communities.
- Creating signage for the communities in the local pilot projects in North Carolina.
- Providing printed materials for organizations in North Carolina.
- Website development, hosting, and maintenance of the Breastfeeding Family Friendly Communities and BreastfeedDurham websites and, when funds permit, hosting of other pilot project websites within the U.S.
  - Provide documentation on the website of the work in the local pilot projects as examples to support other communities.

- Making breastfeeding family friendly materials available on the website for download and printing by interested communities.
- Presentations and workshops at local, regional, national, and international conferences (virtually at this time, in-person when we are able) to bring awareness of and support for the Breastfeeding Family Friendly Communities initiative.
- b. Who participates in the activities

Members of the BFFC board members and pilot project implementation teams in North Carolina facilitate all activities. Anyone in the community is welcome to participate in the activities. Many times these community members are breastfeeding families, volunteer community members, and people working with organizations that support young families, such as a local Health Department and/or non-profits.

c. Where you conduct the activities

We are based in Chapel Hill, North Carolina, and conduct activities from the Chapel Hill/Carrboro/Durham area to support communities throughout the United States using electronic (e.g., email) or online (e.g., Google meet) communications or by phone. At this point all activities are conducted virtually; however, when in-person activities are permitted, we plan to do presentations and workshops locally, regionally, nationally (e.g., U.S. Breastfeeding Committee Coalition Conference), and internationally (e.g., International Lactation Consultants Association conference). Within the next three years, we hope to support communities globally with education via virtual communications (i.e., emails, online meetings) to become Breastfeeding Family Friendly by approaching organizations like the World Alliance for Breastfeeding Action (WABA; https://waba.org.my).

d. When or how often the activities occur

Volunteers implementing the *Ten Steps to a Breastfeeding Family Friendly Community* do not attend every meeting or activity; however, activities are taking place weekly, monthly, quarterly, twice a year, and yearly.

e. What fees, if any, are charged and how you determine them

No fees have been charged. We recognize that this initiative cannot be sustained by volunteers only. Our hope is to apply for grants to sustain the work rather than charge fees so that we can provide equitable support to all who request information, education or consultation. In addition, in the future we may need to charge an hourly rate or project rate for hospitals, health departments, and other organizations that request our time and expertise.

f. What percentage of your time and resources you spend on the activities

| What specific activities you conduct   | Time | Resources<br>(Varies year to year) |
|--|------|------------------------------------|
| Education via virtual meetings (e.g., Zoom or Google Meet)<br>with members of different communities that reach out to us, in<br>order to support the implementation of the <i>Ten Steps to a</i><br><i>Breastfeeding Family Friendly Community</i> by offering how-to<br>information on relevant topics. | 25%  | (valies your to your)<br>0%        |
| Technical assistance and consultation through virtual or<br>electronic communication (e.g., Zoom/Google meet, email) to<br>address specific questions from an interested community's<br>implementation team as regards the Ten Steps to a<br>Breastfeeding Family Friendly Community.                    | 5%   | 0%                                 |
| Trainings and workshops (virtual at this time, in-person when we will be able) for child care providers within the U.S.  | 5%   | 0%                                 |
| Offering technical assistance to the North Carolina Department<br>of Instruction on curricula to normalize breastfeeding in the<br>school setting.   | 3%   | 0%                                 |
| Providing educational and technical assistance on<br>breastfeeding friendly policies and programs to<br>town/city/county municipalities in local pilot projects in North<br>Carolina.  | 5%   | 0%                                 |
| Educational events (virtual at this time, in-person when we are<br>able) such as health fairs and presentations at business<br>organizations for businesses, organizations, and healthcare<br>providers in local pilot projects in North Carolina.   | 5%   | 5%                                 |
| Continued communications with local businesses to encourage participation as a breastfeeding friendly business in breastfeeding family friendly communities.   | 10%  | 0%                                 |
| Creating signage for the communities in the local pilot projects in North Carolina.  | 2%   | 25%                                |
| Providing printed materials for organizations in North Carolina.   | 5%   | 20%                                |
| Website development, hosting, and maintenance of the<br>Breastfeeding Family Friendly Communities and<br>BreastfeedDurham websites and, when funds permit, hosting<br>of pilot project websites only within North Carolina.  | 30%  | 50%                                |
| Presentations and workshops at local, regional, national, and<br>international conferences (virtually at this time, in-person when<br>we are able) to bring awareness of and support for the<br>Breastfeeding Family Friendly Communities initiative.  | 5%   | 0%                                 |

5. Please provide your actual revenues and expenses for each year you completed and projections of your likely revenue and expenses for your current and future years(s) for a total of 3 years of financial information.

|  | Expenses<br>2020 | Income<br>2020 | Expenses<br>2021 | Income<br>2021 | Expenses<br>2022 | Income<br>2022 |
|--|------------------|----------------|------------------|----------------|------------------|----------------|
| Total  | \$967            | \$1,312        | \$2,972          | \$3,012        | \$9,052          | \$9,512        |
| Educational: Direct mail                     | \$0              | \$0            | \$20             | \$0            | \$20             | \$0            |
| Educational: Event support (food, materials) | \$0              | \$0            | \$0              | \$0            | \$500            | \$0            |
| Educational: Exhibiting graphics/materials   | \$0              | \$0            | \$100            | \$0            | \$250            | \$0            |
| Educational: Media relations                 | \$0              | \$0            | \$0              | \$0            | \$0              | \$0            |
| Educational: Press releases                  | \$0              | \$0            | \$0              | \$0            | \$0              | \$0            |
| Fee: 501(c)(3) to Pay.gov                    | \$275            | \$0            | \$0              | \$0            | \$0              | \$0            |
| Fee: Banking                                 | \$0              | \$0            | \$0              | \$0            | \$100            | \$0            |
| Fee: Incorporation                           | \$60             | \$0            | \$0              | \$0            | \$0              | \$0            |
| Fee: Paypal                                  | \$20             | \$0            | \$0              | \$0            | \$0              | \$0            |
| Income: Donations via paypal                 |                  | \$700          |                  | \$2,500        |                  | \$3,000        |
| Income: Grants                               |                  | \$0            |                  | \$0            |                  | \$6,000        |
| Printed Materials: Brochures                 | \$0              | \$0            | \$100            | \$0            | \$100            | \$0            |
| Signage: Signs/clings (Pilot Projects in NC) | \$0              | \$0            | \$1,800          | \$0            | \$5,000          | \$0            |
| Website: Development/Hosting                 | \$300            | \$300          | \$500            | \$200          | \$720            | \$300          |
| Website: Electronic communications software  | \$0              | \$0            | \$20             | \$0            | \$100            | \$0            |
| Website: G Suite                             | \$300            | \$300          | \$400            | \$300          | \$550            | \$200          |
| Website: Google domains (Due January)        | \$12             | \$12           | \$12             | \$12           | \$12             | \$12           |
| Website: Invitations                         | \$0              | \$0            | \$20             | \$0            | \$100            | \$0            |
| Website: Newsletters                         | \$0              | \$0            | \$0              | \$0            | \$100            | \$0            |
| Website: Social media                        | \$0              | \$0            | \$0              | \$0            | \$0              | \$0            |
| Website: Tech Support/Optimization           | \$0              | \$0            | \$0              | \$0            | \$1,500          | \$0            |

6. Do you or will you engage in financial transactions (for example, loans, payments, rents, etc) with any of your donors or any entities they own or control? If so, please provide a detailed description. (Do not include names of donors.)

We have reimbursed a donor for payment of the IRS fee, and we may reimburse the donor who donates website services, as the cost of services increase or become more complex. It also is possible that we may hold an in-person meeting in a room in a building owned by a donor; in that case, we will pay the required fee for the meeting room. We have highly skilled donors who want to generously donate their time and their resources. It's possible that we may utilize a company owned by a donor. For example, if a donor owns an advertising firm and we choose to utilize the advertising firm's services because the donor is willing to donate the services or time for free, but the co-owner requires compensation for expenses such as ink for the printer or Amazon hosting fees, we will reimburse those costs.

7. On Part III, line 4 of your Form 1023EZ, *Streamlined Application for Recognition of Exemption Under Section 501(c)(3) of the Internal Revenue Code*, you indicated you would attempt to influence legislation. Please describe your attempts to influence legislation in detail and state the percentage of your total expenditures and total time spent on these activities during each of your taxable years and an estimate of your total expenditures and total time you intend to spend on these activities in the future. For purposes of calculating the percentage of expenditures, allocate salaries, administrative, overhead, and other general expenditures to these activities using a reasonable method. For purposes of calculating the percentage of time, include volunteer as well as employee hours.

For purposes of this question, you are attempting to influence legislation if you contact, or urge the public to contact, members of a legislative body for the purpose of proposing, supporting, or opposing legislation. For these purposes, the term "legislation" includes action by Congress, a state legislature, a local council, or a similar governing body, with respect to acts, bills, resolutions, or similar items (such as legislative confirmation of appointive offices) or by the public in referendums, ballot initiatives, constitutional amendments, or similar procedure.

Breastfeeding Family Friendly Communities works with legislators in different ways. As part of the *Ten Steps to a Breastfeeding Family Friendly Community*, we advocate for breastfeeding-friendly policies in the local government (e.g., town, city, county) and the State School Board. We also advocate for breastfeeding-friendly legislation at the State and National levels. Our current and anticipated **total percentages** for expenditures and time are indicated here. A description of these activities follows.

|                    | 2020 (first taxable year) | Est. 2021 | Est. 2022 | Est. 2023 and Beyond |
|--------------------|---------------------------|-----------|-----------|----------------------|
| Total Expenditures | 0%                        | < 1%      | 6%        | < 10%                |
| Total Time         | < 3%                      | 4%        | 4%        | < 10%                |

Response to Question #7 continues on next page

| <b>Local Municipalities:</b> Breastfeeding Family Friendly Communities supports towns/cities/county governments to create proclamations and policies, as part of the <i>Ten Steps to a Breastfeeding Family Friendly Community</i> .   | Expenditure | Time |
|--|-------------|------|
| <ul> <li>2020: We have provided education, electronic materials, and technical assistance to North Carolina municipalities to create breastfeeding family friendly proclamations and policies.</li> <li>There were no expenditures, as work was completed online/virtually.</li> <li>Time included communications with municipal leaders to encourage towns/cities/counties to write proclamations and incorporate policies that foster breastfeeding friendly practices for their municipalities.</li> </ul>  | 0%          | 2%   |
| <ul> <li>Est. 2021: We plan to continue to provide education, electronic materials, and technical assistance to North Carolina municipalities to create breastfeeding family friendly proclamations and policies.</li> <li>There are no expenditures currently, as all work is completed online/virtually. When in-person work opens up again, the percentage of expenditures for the step may increase to up to 1% for printed materials.</li> <li>Time includes communications with municipal leaders to encourage towns/cities/counties to write proclamations and incorporate policies that foster breastfeeding friendly practices for their municipalities.</li> </ul> | 0-1%        | 2%   |
| <ul> <li>Est. 2022 and beyond: We plan to continue to provide education, electronic materials, and technical assistance to North Carolina municipalities to create breastfeeding family friendly proclamations and policies.</li> <li>We anticipate that we will be doing in-person work in addition to virtual work. When in-person work opens up again, the percentage of expenditures for the step may increase for printed materials.</li> <li>Time includes communications with municipal leaders to encourage towns/cities/counties to write proclamations and incorporate policies that foster breastfeeding friendly practices for their municipalities.</li> </ul>  | 2%          | 2%   |

| <b>North Carolina Boards of Education:</b> Breastfeeding Family Friendly Communities also works with public school systems, including public school boards that include elected officials, as part of the <i>Ten Steps to a Breastfeeding Family Friendly Community</i> .   | Expenditure | Time |
|---|-------------|------|
| 2020: Local school districts use the State Board of Education curricula, and we will be reaching out to school boards in local pilot program communities in North Carolina and the North Carolina State Board of Education, all of which include elected officials, to advocate for curricula policies and practices that support and normalize breastfeeding. We have not started this activity. | 0%          | 0%   |
| Est. 2021: We will be reaching out to school boards in local pilot program communities in North Carolina and the North Carolina State Board of Education, all of which include elected officials, to advocate for curricula policies and practices that support and normalize breastfeeding. We will use online and electronic communications and materials.                                      | 0%          | 1%   |
| Est. 2022 and beyond: We will continue the activities stated in 2021. We will use online and electronic communications and use both electronic and printed materials.   | 2%          | 1%   |

Response to Question #7 continues on the next page.

| <b>National:</b> Breastfeeding Family Friendly Communities (BFFC) also advocates for legislation that is family and breastfeeding friendly.   | Expenditure | Time |
|---|-------------|------|
| <ul> <li>To date: BFFC has signed on to an electronic letter written by a national breastfeeding organization that was addressed to the U.S. Congress requesting that legislators support a Paid Leave bill for families, specifically families that have recently given birth or adopted a child. The letter provided vital education about the importance of limiting separation of the child and parent to promote successful breastfeeding initiation and duration.</li> <li>Activity was completed electronically.</li> <li>Time included review of the letter/legislative information online, discussion within the implementation team, and completion of the online form to add our organization to the national breastfeeding organization letter.</li> </ul>  | 0%          | <1%  |
| <ul> <li>Est. 2021: We plan to continue to advocate for legislation that supports practices that increase initiation and duration breastfeeding, chestfeeding, and human milk feeding. Anticipated activities are listed below: <ul> <li>Staying aware of pertinent legislation through reading of newsletters and email updates from national and state breastfeeding organizations.</li> <li>Signing on to electronic letters created by national and state breastfeeding organizations.</li> <li>Writing emails and electronic letters to national and state legislators that provide education and information about the importance of the legislation for breastfeeding, chestfeeding, and human milk feeding families.</li> <li>Occasionally calling specific legislators.</li> <li>Sharing information through posts and reposts about the legislation on our social media platforms (e.g., BFFC Facebook pages).</li> </ul> </li> </ul> | 0%          | 1%   |
| <ul> <li>Est. 2022 and beyond: With additional funding, we may have the opportunity to expand our advocacy efforts regarding legislation in the U.S. that supports practices that increase initiation and duration breastfeeding, chestfeeding, and human milk feeding.</li> <li>Mailing letters and educational materials to legislators.</li> <li>Dropping off letters and educational materials to legislators' local offices in local pilot project communities in North Carolina (NC) or at the NC State Capitol.</li> </ul>   | 2%          | 1%   |

8. You provide (or will provide) compensation to your officers, directors, or trustees. Please provide the following information:

a. Describe the compensation arrangements that you have (or will have) with the officers, directors or trustees.

We responded yes to this question, because we hope to hire an executive director in about 5-6 years to maintain the day-to-day operation of the organization and implement strategic plans for the organization in collaboration with the board. Compensation will include an hourly wage, flexible work hours, and a lactation policy that will allow the executive director to bring their child to work for up to the first two years. The position may be part-time (20 hours/week) at first with the goal to increase to full-time (40 hours/week) when budget permits.

b. Explain how you determine amounts of compensation and the approval process for direct and indirect compensation for the officers, directors, or trustees.

Important factors when determining compensation will be the size of our budget and the cost of living in our area. The hourly wage will exceed the mandated minimum wage in North Carolina, and we will review compensation based on information from other nonprofits in the same area and with similar budgets and focus. Benefits for the position will be flexible work hours and a breastfeeding-welcome lactation policy. The executive director's compensation will be approved by the Board.

c. Describe the limits you place on total compensation.

Total compensation will be limited by the constraints of our budget. To ensure that the compensation is not excessive, we will review compensation information for similar positions in nonprofits in our area with similar budgets and focus.

Provide any other information regarding your compensation arrangements, including copies of any employment or compensation contracts or agreements.
 We currently do not provide compensation to any directors, officers, or trustees.

9. Your application indicates that you donate funds to or pay expenses for individuals. Please provide the following:

a. Describe in detail the purpose of the funds you distribute (or will distribute) and how the funds are (or will be) used by the individual recipients.

When the budget permits, we hope to have funds to reimburse Breastfeeding Family Friendly Communities (BFFC) implementation team members for their expenses in the local pilot projects in North Carolina. The purpose of the funds is to provide local pilot project team members, who are volunteers, funds to complete BFFC activities, such as, using the funds:

- to provide food for lunch-and-learn educational meetings for healthcare providers or local business owners, when we are able to conduct in-person meetings;
- to put together breastfeeding supportive packets (e.g., small reading books) when meeting with childcare providers;
- to pay for the hosting and additional software to upgrade the website.
- b. Describe your recipient selection process, including the criteria you use (or will use) to determine the recipients of the funds.

Recipients will be volunteers who have shown enthusiasm for the mission of the organization and have worked with BFFC for at least two months. Recipients will have shown the needed skills (e.g., Information Technology/IT or social media skills to support our social media and website presence) and/or have taken leadership roles in moving one or more of the steps within the *Ten Steps to a Breastfeeding Family Friendly Community*.

c. Explain how the funds are (or will be) distributed and how you ensure that they are (or will be) used for their intended purposes(s).

Recipients will provide information via email to the Board and local pilot project implementation team about the need for the funds - activity or event, purpose of event, date of event, items needed. Recipients will provide a receipt for all items and a short summary of the outcome of the event.

d. Explain whether board members (or their relatives) or members of the committee who select your recipients (or their relatives) are (or will be) eligible to receive funds. If so, describe in detail the safeguards you use (or will use) to ensure the funds are not distributed improperly.

Board members or their relatives may receive funds. We anticipate that our volunteer working board members will be supporting the organization with their skills and experience, and we want to make use of the skills of the board members or their relatives. For instance, a board member with IT skills may receive funds to pay expenses to set up and maintain the website hosting for the organization.

To ensure that the funds are not distributed improperly, the board member will inform the remaining board members and the pilot project implementation team of the need and cost of the activity, and remaining board members will approve/disapprove the use of funds. The board member/relative receiving the funds will provide receipts and a summary of the outcome of the work completed, before funds will be disbursed.

10. Your application indicates that you operate (or will operate) in a foreign country. Please provide the following:

- a. Identify the specific countries (and regions within the countries) in which you operate. Breastfeeding Family Friendly Communities will not be operating in foreign countries. We will operate only from North Carolina; however, we will offer information and technical assistance via email and other online platforms to breastfeeding advocates who reach out to us (e.g., via email) from foreign countries. We are planning to reach out to the World Alliance for Breastfeeding Action (WABA; https://waba.org.my) to increase awareness of the Breastfeeding Family Friendly Communities initiative through their breastfeeding advocacy and work with Breastfeeding and Sustainable Development Goals. WABA is located in Penang, Malaysia.
- b. Describe your operations in each country.

We will not be operating in foreign countries. We will offer information and technical assistance via email and other online platforms to breastfeeding advocates who reach out to us (e.g., via email) from foreign countries to learn more about

completing the *Ten Steps to a Breastfeeding Family Friendly Community* in their country.

- c. Please answer the following about grants you will make to organizations or individuals located in foreign countries:
  - a. State the organizations to which you do (or will) distribute funds or goods, and if they have been recognized as tax-exempt by the IRS, state their exempt status.
     We will not be making grants to organizations.
  - b. List any distributions (in funds or goods) you made to date, including the recipient, what and how much was disbursed, and how the distribution furthered your exempt purposes.

We have not distributed any funds or goods to recipients in foreign countries, just information and technical assistance.

c. Describe your process for reviewing and approving requests for funds or goods, include the pre-grant inquiries you conduct on potential grantees and how you determine grant amounts.

We have not entered and will not be entering into grant agreements with individuals or organizations in foreign countries. Information and technical support may be provided via email or an online platform (e.g., Google Meet).

d. If you enter into a written grant agreement with grantees, submit representative copies of the grant agreement.

We have not entered and will not be entering into grant agreements with individuals or organizations in foreign countries.

- e. If a grant recipient is eligible for repeated grants, explain whether they must reapply and continue to provide information regarding how funds or goods are used. We have not entered and will not be entering into grant agreements with individuals or organizations in foreign countries.
- f. Explain whether you accept donations earmarked for particular organizations or individuals.

We do not accept donations earmarked for particular organizations or individuals.

g. Specify how you will exercise control and responsibility over the use of any funds or goods granted to foreign organizations or individuals to ensure they are used properly (e.g., requiring grantees to submit periodic reports, or accountings, engaging accountants to audit grantees, sending representatives or agents for field investigations, etc.).

We will not be granting goods or funds to foreign organizations or individuals.

h. Specify to what extent, if any, you share board members or other key personnel with recipient organizations.

We will not be making grants to foreign organizations or individuals and will not be sharing board members or other key personnel.

11. Please answer the following in regard to Office of Foreign Assets Control (OFAC) compliance.

- a. When you conduct activities in foreign countries, will you check the OFAC LIst of Specially Designated Nationals and Blocked Persons for names of individuals and entities with whom you are dealing to determine if they are included on the list? When individuals and entities from foreign countries reach out to us for information and education about the Breastfeeding Family Friendly Communities initiative, we will check the OFAC List of Specially Designated Nationals and Blocked Persons list to determine if they are included on the list.
- b. What other practices will you engage in to ensure that foreign expenditures or grants are not diverted to support terrorism or othe non-charitable activites?
   We will not be providing any funds to foreign individuals or organizations. We will only provide information about the *Ten Steps to a Breastfeeding Family Friendly Community*.
- c. Will you comply with all United States statutes, executive orders, and regulations that restrict or prohibit U.S. persons from engaging in transactions and dealings with designated countries, entities, or individuals, or otherwise engaging in activities in isolation of economic sanctions administered by OFAC?

Yes, we will comply with all United States statutes, executive orders, and regulations that restrict or prohibit U.S. persons from engaging in transactions and dealings with designated countries, entities, or individuals, or otherwise engaging in activities in isolation of economic sanctions administered by OFAC.

d. Will you acquire from OFAC the appropriate license and registration where necessary?

Yes, we will.

12. You indicated you will engage in financial transactions with your officers, directors, trustees, or entities they own or control. Please provide the following information:

a. Describe all leases, contracts, loans, and other similar agreements you made (or intend to make) with your officers, directors, or trustees.

To date: We have reimbursed a board member for payment of the IRS fee.

Future possibilities: We may reimburse a board member who donates website services, for example, Google services. It also is possible that we may hold an in-person meeting in a room in a building owned by a board member; in that case, we will pay the required fee for the meeting room. It is possible that a North Carolina pilot project team member may become an officer or director at a future date, and we may provide grant funds to that pilot project team member/officer or director in order to complete activities towards completing the *Ten Steps to a Breastfeeding Family Friendly Community*. If we hire an executive director at a future date, we will be paying a salary to the executive director.

b. Describe all leases, contracts, loans, and other similar agreements you made (or intend to make) with organizations in which one or more of your officers, directors, or trustees has a financial interest.

We have not made agreements with our officers, directors, or trustees.

To date: We have highly skilled working board members who generously donate their time and their resources. Currently, we reimburse members for some of their expenses; however, board members donate more than they are reimbursed.

Future possibilities: It's possible that we may utilize a company owned by a board member or a spouse of a board member. For example, if a board member owns an advertising firm and we choose to utilize the advertising firm's services because the staff is willing to donate their time for free, but the co-owner requires compensation for expenses such as ink for the printer or Amazon hosting fees.

c. Identify all parties with whom you have (or will have) such agreements.

We have no current agreements.

In 5-6 years, when we hope to hire an executive director, we will engage in an agreement with the executive director for wages.

We may provide grant funds to a Breastfeeding Family Friendly Communities North Carolina pilot project in which a pilot project member also is a director or officer. We may procure service contracts or enter rental agreements with potential board members or officers who provide the needed services.

d. Describe the process used to approve these leases, contracts, loans, or other similar agreements.

Our objective will be to get the best and most advantageous price for Breastfeeding Family Friendly Communities (BFFC) and to ensure that the business practices are

compliant with the <u>Code of Marketing of Breast-milk Substitutes</u> (the "WHO Code"; https://www.who.int/nutrition/netcode/resolutions/en/).

- Grant funds: All requests for grant funds by a pilot project/board member will be in writing, via email or fax. Requests will include the activity, date of the activity, reason for the activity, justification for the money requested, and expected outcomes. The remaining Board members will review the information and approve/disapprove the request. Within 30 days of the date of the activity, the pilot project member will provide receipts and a written summary of the event that includes information on attendees and materials used, as well as outcomes (e.g., did outcomes meet expectations, suggestions for similar activities in the future).
- Contracts and Leases: We might engage in contracts for services or rent. For all contracts and agreements, including those that involve BFFC members, we will get at least three quotes for projects over 10% of the annual budget. We will compare prices on vendor websites, when possible, and if needed, we will solicit estimates by email, including the estimate of any BFFC members. The remaining Board members will review the information and approve/disapprove the request. We will pursue the most value regardless of the owner of the company, as long as the company is WHO Code compliant.
- Loans: We do not and will not provide loans.
- e. Explain how you ensure that you pay no more than fair market value or that you are paid at least fair market value with respect to agreements involving the related individuals or entities.
  - Grant funds: We will compare the item costs in the request for grant funds with other projects to ensure that we are not paying above fair market value.
  - Contracts and Leases: We will get at least three quotes for projects over 10% of the annual budget. For all contracts and leases, we will compare prices on vendor websites, when possible, and if needed, we will solicit estimates by email, including the estimate of any BFFC members to ensure that we are not paying above fair market value.
  - Loans: We do not and will not provide loans.
- f. Provide copies of all signed leases, contracts, loans, or other written agreements with the related parties. If you have leases, contracts, loans or other agreements with the related parties that are not in writing, provide copies of the board of directors' minutes that authorize any such agreements.

BFFC has not entered into any agreements to date.

13. Your application indicates that you will be involved in disaster relief activities. Please provide the following information if you distribute (or will distribute) funds and/or goods to individuals and/or organizations. (If you are not distributing funds or goods, please provide a brief description of the disaster relief services you are providing.)

Disaster Relief funds and goods: We will not be distributing funds or goods. Disaster Relief Services: Breastfeeding Family Friendly Communities (BFFC) initiative will be providing information and education to disaster relief organizations regarding best practices in supporting breastfeeding families during a disaster. We have compiled information in a toolkit on the BFFC website

(<u>https://breastfeedingcommunities.org/first-responders/</u>). Information will be sent electronically via email to organizations to assist them in making informed decisions about best practices for helping breastfeeding families.

a. Describe in detail the purpose of the funds and/or the types of goods you distribute (or will distribute) and how the funds and/or goods are (or will be) used by the recipients.

Please see the description above about the BFFC activities as related to disaster relief services. BFFC will not be distributing funds or goods.

b. Describe your recipient selection process, including the criteria you use (or will use) to determine the recipients of the funds and/or goods.

Please see the description above about the BFFC activities as related to disaster relief services. BFFC will not be distributing funds or goods.

- c. Explain how the funds and/or goods are (or will be) distributed and how you ensure that they are (or will be) used for their intended purpose(s).
   Please see the description above about the BFFC activities as related to disaster relief services. BFFC will not be distributing funds or goods.
- d. Explain whether board members (or their relatives) or members of the committee who select your recipients (or their relatives) are (or will be) eligible to receive funds and/or goods. If so, describe in detail the safeguards you use (or will use) to ensure the funds and/or goods are not distributed improperly.

Please see the description above about the BFFC activities as related to disaster relief services. BFFC will not be distributing funds or goods.

#### Appendix

#### TEN STEPS TO A BREASTFEEDING FAMILY FRIENDLY COMMUNITY

Step 1. The community's elected or appointed leadership has a written statement supporting breastfeeding that is routinely communicated to all.

Step 2. The community as a whole provides a welcoming atmosphere for breastfeeding families.

Step 3. Optimal breastfeeding<sup>1</sup> is supported by health leadership.

Step 4. During pregnancy, all families in the community are informed about the benefits of breastfeeding, as well as about the risks of unnecessary formula use, and where to access support as needed.

Step 5. Health care in the community is breastfeeding-friendly.

Step 6. Non-healthcare system breastfeeding support groups and services are fully available in the community, including International Board Certified Lactation Consultants (IBCLCs), La Leche League (LLL), and other skilled breastfeeding support.

Step 7. The businesses and social organizations in the community are welcoming to breastfeeding families.

Step 8. Local businesses and healthcare clinics/offices follow the principles of the *International Code of Marketing of Breast-Milk Substitutes*.

Step 9. The World Alliance for Breastfeeding Action (WABA) Maternity Care or, in the US, The US Business Case for Breastfeeding is promulgated by the government and the Chamber of Commerce or equivalent.

Step 10. Education systems, including childcare, K-12, colleges and universities, are encouraged to include breastfeeding-friendly curricula at all levels.

<sup>1</sup>Optimal breastfeeding is defined as early and exclusive breastfeeding for up to 6 months and continued breastfeeding, with appropriately-timed introduction of complementary foods, for at least 1-2 years and for as long as the mother and child desire.