INTRODUCTION ..................................................................................................................................... 1
Federal, State, and University Lactation Policies .................................................................................. 1
Time ............................................................................................................................................................ 2
Space ............................................................................................................................................................ 2
Security ....................................................................................................................................................... 3
Furniture ...................................................................................................................................................... 4
Supplies ....................................................................................................................................................... 4
Room Point of Contact .................................................................................................................................. 4
Hospital Grade Breast Pump ....................................................................................................................... 4
Housekeeping.............................................................................................................................................. 4

WHAT SHOULD SUPERVISORS & CHAIRS DO TO SUPPORT BREASTFEEDING WOMEN? ........................................................................................................................................... 5

CONTACT INFORMATION AND ADDITIONAL RESOURCES ................................................................. 7

Quick References

- Parenting@UNC: http://womenscenter.unc.edu/resources/parenting/
- Lactation Room Locations: http://womenscenter.unc.edu/lactation-rooms/
- On-campus Lactation Resources: http://womenscenter.unc.edu/lactation-resources/
- Carolina Women’s Center: cwc@unc.edu, 919-962-8305

Developed with support from the following at UNC: Carolina Women’s Center | Committee on Community and Diversity | Committee on the Status of Women | Employee Forum | Faculty Welfare Committee | Fixed-Term Faculty Committee | Provost’s Office | Office of Human Resources
INTRODUCTION

The University of North Carolina at Chapel Hill is committed to supporting employees with children, including nursing mothers who want to lactate at work. Not all women want to or can breastfeed, but many mothers do, as recommended by the American Academy of Pediatrics (AAP).1 Some combine breastfeeding with formula feeding by nursing before and after work and on their days off.

In line with federal and state regulations, UNC-CH has a policy to support breastfeeding in the workplace. This toolkit provides information on the health and business benefits of breastfeeding, about UNC-CH’s policies and mandates around lactation spaces, and on ways for both supervisors and employees to balance work with the right to lactate.

LACTATION IN THE WORKPLACE

FEDERAL, STATE, AND UNIVERSITY LACTATION POLICIES

In compliance with the 2010 Affordable Care Act and the subsequent North Carolina Office of State Human Resources’ Lactation Support policy2, UNC adopted its Lactation Support Policy in March 2010.3 The ACA includes three major provisions to support breastfeeding that impact UNC and its employees4:

1. Workplaces must allow nursing mothers a “reasonable break time” to nurse or express milk for up to one year after the birth of the child.
2. Employers of 50 or more people must provide a private, secure, non-bathroom space for mothers to nurse or express milk.
3. All ACA-compliant health insurance plans (non-grandfathered plans) must cover the costs of breast pumps, whether through rental or purchase. UNC’s Enhanced 80/20 Plan meets ACA mandates. The Basic 70/30 Plan is grandfathered and does not cover breast pumps.

Everyone in the workplace should be familiar with the University and OSHR policies. Employees should also feel confident and comfortable bringing the policy to the attention of their supervisors. Together, supervisors and employees can discuss how they can most effectively balance the employee’s work responsibilities with the right to breastfeed or express milk. The Program Coordinator for Faculty and Staff with the Carolina Women’s

---

1 [www.aap.org/healthtopics/breastfeeding.cfm](http://www.aap.org/healthtopics/breastfeeding.cfm). The AAP and the American Association of Family Physicians recommend that mothers breastfeed their infants until at least twelve months old. Many women choose not to or are unable to breastfeed. We recognize and support the full range of parenting and strive to make UNC family friendly for all families.


Center can also help both employees and supervisors consider how to approach the discussion and find a solution.

An updated list of lactation rooms’ locations—plus much more—is on the Parenting@UNC website. UNC is also working to create more designated rooms to meet the recommendations of the UNC Lactation Rooms Working Group Report (2011-2012).

**LACTATION SPACES AND ROOMS**

The sections below detail how to meet the mandates of the ACA, the OSHR, and UNC’s policies.

**TIME**

On average, nursing mothers need to express breast milk approximately every three hours during the workday. The UNC Lactation Policy, in compliance with the ACA, mandates that supervisors must allow “reasonable break time” for lactation. Employees may use their paid regular breaks and lunch breaks for pumping; extra time needed for breastfeeding or lactation is unpaid leave time.

**SPACE**

If there is not an existing lactation room within a 2-minute walk of the work site, the supervisor or employee should contact the Program Coordinator for Faculty and Staff at the Carolina Women’s Center. The Program Coordinator can help identify an appropriate permanent or temporary space.

Modifying facilities to accommodate a designated Lactation Space is fairly simple and can be inexpensive. At minimum, a lactation room **must be ADA-compliant**. It must have

- dimensions of at least 8’ x 10’,
- a sink with, or be close to (within 250’) a source of, hot running water,
- an easily accessible electrical outlet,
- a chair,
- a table or desk that can be used as a pumping station, and
- a lockable door, and curtains or blinds as necessary, for privacy.

---

5 [http://womenscenter.unc.edu/resources/parenting/](http://womenscenter.unc.edu/resources/parenting/).
6 UNC’s break periods policy encourages, “as operational requirements permit and working conditions warrant, management [to] allow employees to take one 15-minute paid break during any work period of four consecutive hours. … as deemed necessary for safety and health reasons, management may allow more than one break period per four hours as needed or require break periods at specific times of the day. Break periods are counted as work time.” See [http://hr.unc.edu/policies-procedures-systems/spa-employee-policies/wage-hour/wage-hour-definitions/-Break_Periods](http://hr.unc.edu/policies-procedures-systems/spa-employee-policies/wage-hour/wage-hour-definitions/-Break_Periods).
The *UNC Lactation Rooms Working Group Report (2011-2012)* provides greater detail about UNC’s standards for and categories of lactation facilities and the minimum requirements for each (see Appendix A), discussed in more detail below.

If creating a dedicated lactation room is not possible, there are a number of feasible temporary alternatives. Each of the following options should meet the requirements for a designated space (above).

- A *conference room* that can be locked from the inside, reserved in blocks for lactation,
- An *unused classroom* or *seminar room* that can be locked from the inside,
- An *empty office*,
- A *lounge* or *break room* that can be locked from the inside that can be reserved, or
- An *office borrowed from a colleague*. (Because of the inconvenience to the office’s occupant and the unease it may cause the mother, this should a last resort.)

Other options may be available, but as per federal law, a bathroom is *not* an acceptable lactation facility and a *breastfeeding mother may NOT be expected or required to use a restroom.*

**Security**

The door should have an internal door lock. Depending on where it is located, a UNC lactation room may have one of three external locks.

- In buildings frequently used by visitors (e.g., Morehead Planetarium, Student Union, NC Botanical Garden): *key or code* obtained from the building’s reception desk.
- In secure buildings that require permission to access even during normal business hours:
  - In single unit buildings (e.g., Development), unlocked when not in use with an internal privacy lock.
  - In buildings housing multiple units (e.g., Lineberger Cancer Center), *OneCard* access.
- Lactation rooms in open access buildings (e.g., classroom buildings): *OneCard* or *code* access.

***For access to lactation rooms with your OneCard or a key code, please email lactation@unc.edu. Requesting OneCard access enables users to access all lactation rooms with OneCard locks.***

These locks ensure that only appropriate users have access to lactation rooms.

Additionally, the room should not contain any kind of security camera equipment.
FURNITURE
The room should have a table, a comfortable chair, and a trashcan.

SUPPLIES
Anti-bacterial soap (to clean equipment after use)
Paper towels
Door sign to indicate room in use (see Appendix C)
Sign with contact information to report housekeeping and other issues (see Appendix D)
Bulletin board (optional)

ROOM POINT OF CONTACT
The Carolina Women’s Center is the main of Point of Contact for all lactation rooms, but buildings may designate an employee to field daily maintenance responsibilities, such as cleaning. Contact information for the CWC POC and Housekeeping should be prominently displayed (see Appendix D). If the building chooses to designate an additional POC, their contact information should be added to the sign.

HOSPITAL GRADE BREAST PUMP (optional)
Because the ACA mandates that all non-grandfathered insurance plans cover the cost of individual breast pumps and because of the requirements for adequately cleaning the pumps, University lactation rooms are not equipped with Hospital Grade Pumps. The State Health Basic 70/30 Plan does not meet ACA coverage requirements, including not covering the purchase or rental of a breast pump. You must be enrolled in the Enhanced 80/20 Plan to be eligible for a free breast pump. For more information and to learn how to obtain a breast pump, please contact the North Carolina State Health Plan at 855-859-0966.7

Through the Office of Human Resources Work/Life unit, HR offers Ameda Breastpumps for a significant discount.8 For more information, please contact the Benefits Office at 919-843-2300 or benefits@unc.edu.

HOUSEKEEPING
The UNC Lactation Rooms Working Group Report (2011-2012) includes a detailed description of the standards and practices Housekeeping follows for lactation rooms. Please see Appendix B. Housekeeping is aware of these responsibilities, and the Contact Information sign (Appendix D) includes the number for the Director of Housekeeping Services. In the case of new lactation rooms, the Director can assist with introducing new duties to the Housekeeping staff’s schedule.

7 http://www.shpnc.org/
8 hr.unc.edu/files/2012/11/CCM3_031896.pdf
WHAT SHOULD SUPERVISORS & CHAIRS DO TO SUPPORT BREASTFEEDING WOMEN?

Supervisors’ support and cooperation are essential in helping women access their right to breastfeed. The following are things supervisors can do:

- **Accommodate breastfeeding/pumping time during the workday**—flexible break time—as needed. Under ACA requirements, supervisors and chairs must allow “reasonable break time” for women to nurse or express milk, for up to one year following the birth of the child. On average, breastfeeding women returning to work will need to pump an average of 25 minutes (not including time getting to and from the lactation room) every 3 hours.

- **Include lactation policies and resources in all employees’ orientation:** When new employees join the unit, include lactation policies and resources as part of all employees’ orientation to university policies and benefits. This knowledge sharing will also minimize non-nursing employees’ dissatisfaction.

- **Understand the importance of sufficient parental leave** for new mothers to establish breastfeeding. It takes 6 to 8 weeks for baby and mother to establish a sufficient, consistent milk supply. Employees taking family leave should feel comfortable taking as much leave as they want, as allowed by the policy governing leave options (e.g., FMLA or the Faculty Serious Illness, Disability, or Parental Leave policy). Supervisors may also support intermittent FMLA or Parental Leave (e.g., the employee takes 8 weeks of continuous leave and uses the remaining 20 days to work 3 days/week for 10 weeks); the employee and supervisor should agree to a proposed schedule before the employee begins leave.

- **Before employees go on parental leave,** discuss their plans for returning to work and what kinds of accommodations they may need. This does not mean the supervisor can or should ask, “Do you plan to breastfeed when you return?” Rather, the supervisor should ask an open-ended question, such as:
  - “Have you thought about your return from family leave?”
  - “How can we help welcome you back?”
  - “What kinds of accommodations do you think you’ll need when you return?”
  - “I know we discussed all this when you joined the team, but let’s revisit. We have several options, including lactation accommodations and resources. We can also talk about flexible work hours and location.”

- **Help nursing mothers to return to work gradually or on a flexible schedule,** if possible. They will experience less disruption to their breastfeeding and be better able to meet their work obligations as a consequence.
  - For example, scheduling the first day back on a Thursday or Friday provides the employee a gentler return to work.

- **Support leaves and flexible schedules:** Support the nursing mother’s partner’s participation in the birth and lactation process by supporting leaves and flexible schedules when possible.

- **Know the location of the nearest lactation facility:** if your staff work off-site, know
the location of lactation spaces in parts of campus where they frequently work.

- **Consider setting up a permanent or temporary lactation space** in your unit or building. The Carolina Women’s Center, in collaboration with Facilities, can help identify a range of solutions.

- **Support proactively the University’s flexible work policy**, when possible. It includes temporary changes in work hours, flexible work schedules, and flexible work locations (“teleworking”).
  
  o Explore the possibility for the employee to resume her duties by working from home for the first two weeks.
  
  o Discuss whether, once the employee has returned, she would want to work from home 1-2 days a week for a period.
  
  o Consider whether the employee could work a split shift or could adjust the start and end time (e.g., Start at 7am instead of 8am and leave at 3pm).

- **Be proactive in educating other employees** about the mandated accommodations for breastfeeding co-workers in order to avoid possible misunderstandings and resentment.
  
  ❖ *For example*, let co-workers know that breaks for pumping are allowed and supported.

- **Determine whether any visitors might require accommodations** (wheelchair access, lactation space, dietary restrictions) if the unit hosts a special event (such as a conference, workshop, retreat, appreciation day, etc.). Be prepared to meet that need and/or answer questions about the nearest available lactation room.
  
  ❖ *For example*, add a question to your planning and/or registration such as “Do you require accommodations due a medical condition, disability, dietary restriction, or lactation?”

---

### CONTACT INFORMATION AND ADDITIONAL RESOURCES

<table>
<thead>
<tr>
<th>Information about:</th>
<th>Source:</th>
<th>Contact or access</th>
</tr>
</thead>
</table>
| Lactation, parental leave, and gender equity policies and resources: | Carolina Women’s Center | 919-962-8305  
cwc@unc.edu or lactation@unc.edu  
http://womenscenter.unc.edu/  
Parenting@UNC:  
http://womenscenter.unc.edu/resources/parenting/ |
| Lactation and parental leave policies: | UNC Human Resources  
- FMLA Policy  
- FMLA Summary  
- Faculty Serious Illness, Major Disability and Parental Leave Policy  
- Lactation Support | 919-843-2300  
hr.unc.edu/policies-procedures-systems/spa-employee-policies/worklife-and-wellness/lactation-support/ |
| Benefits plans, and additional programs for families: | UNC Human Resources | 919-843-2300  
Benefits:  
http://hr.unc.edu/benefits/benefit-plans/  
Wellness Programs:  
http://hr.unc.edu/benefits/wellness-programs/  
Work-Life Programs:  
http://hr.unc.edu/benefits/work-life-programs/ |
| Assistance with housekeeping issues: | Herb Richmond, Director of Housekeeping Services | 919-962-1440  
Herb.Richmond@facilities.unc.edu |
<p>| For the previous lactation policy and guidelines: | | Chancellor’s Child Care Advisory Committee. “Lactation Space: A Tool Kit for Department’s and Managers.” University of North Carolina at Chapel Hill. 2008. |</p>
<table>
<thead>
<tr>
<th>UNC breastfeeding support resources:</th>
<th>Carolina BEBES</th>
<th><a href="http://breastfeeding.sph.unc.edu/take-action/carolina-bebes/">http://breastfeeding.sph.unc.edu/take-action/carolina-bebes/</a></th>
</tr>
</thead>
<tbody>
<tr>
<td>Carolina Global Breastfeeding Initiative (School of Public Health)</td>
<td></td>
<td><a href="http://breastfeeding.sph.unc.edu/">http://breastfeeding.sph.unc.edu/</a></td>
</tr>
</tbody>
</table>

### Federal and National Information and Resources

<table>
<thead>
<tr>
<th>Information about:</th>
<th>Source:</th>
<th>Contact or access</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provisions and accommodations under the <em>Affordable Care Act</em> (2010):</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fact sheet #73: Break Time for Nursing Mothers under the FLSA. <a href="http://www.dol.gov/whd/regs/compliance/whdfs73.htm">http://www.dol.gov/whd/regs/compliance/whdfs73.htm</a></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
</tbody>
</table>