

Patricia N. Daniels, Director
Supplemental Food Programs, FNS/USDA
3101 Park Center Drive, Room 528
Alexandria, VA 22302

RE: Docket ID Number 0584-AD77, WIC Food Packages Rule

Dear Ms. Daniels:

We are writing to support USDA's proposed WIC Food Packages Rule, which will:

- improve the health and nutritional quality of the foods in the program;
- expand cultural food options; and
- increase participants' choices.

We commend USDA for updating the WIC food packages to reflect the Dietary Guidelines and current nutritional science by adding fruits and vegetables, whole grain bread, corn tortillas, whole grain rice and other whole grains, the option of soymilk and tofu, and moving to only low-fat milk and whole grain cereals.

Since the food packages were last revised, there has been an explosion of knowledge related to nutrition and health, as well as a growing obesity problem in this country. The addition of fruits and vegetables, whole grain products, and other improvements in the new WIC food packages, will strengthen WIC's positive role to help mothers and children maintain a healthy weight and allow them to make healthy food choices. This will help nutritionally vulnerable children form healthy eating habits from an early age.

Moreover, we applaud USDA's proposed improvements for infants, breastfeeding women, and medically fragile participants. The introduction of fruits and vegetables as baby food for older infants will provide healthy foods the family might not otherwise be able to afford. The new enhanced food package for breastfeeding women should help WIC to promote breastfeeding. The new rule also will provide welcome relief for families struggling to pay for essential nutrition products for women and children with special nutritional needs.

To ensure that WIC participants can get the full value from the new WIC food packages, we offer the following recommendations to strengthen the proposed rule:

- Expand and Enhance the Fruit and Vegetable Benefit
- Eliminate Inappropriate Standards and Size Requirements for Whole Grain Bread and Cereals
- Remove Prescription Requirement for Soy Milk and Tofu
- Keep Proposed Food Package Protections
- Maximize Access to Farmers' Markets
- Establish State WIC Food Package Advisory Councils

Expand and Enhance the Fruit and Vegetable Benefit:

- ***Increase the Fruit and Vegetable Benefits to Fully Meet the Institute of Medicine Recommendations:*** USDA should make the value of the WIC fruit and vegetable benefit consistent with the IOM's recommendation to provide \$10 per month of fruits and vegetables for women and \$8 for children. The proposal gives children only three quarters of the amount of fruit and vegetables the Institute of Medicine (IOM) determined was necessary for a nutritionally sound children's WIC food package. Children receive \$8 in fruits and vegetables in the food package recommended by the IOM, but the USDA package provides only \$6. For women the proposed rule provides only \$8 in fruits and vegetables rather than the \$10 recommended by the IOM.
- ***Allow WIC Participants to Choose the Fruits and Vegetables They Want and Can Use:*** WIC participants should be allowed to use the WIC food vouchers to select the fruits and vegetables that provide the best nutritional value, best bargain and best choice for themselves and their children. The rule should not give State agencies the authority to set state limits on the variety of fruits and vegetables participants are allowed to purchase with WIC vouchers. The successful WIC fruit and vegetable pilots allowed WIC participants full choice.
- ***The Value of the Fruit and Vegetable Benefit Must Keep Pace with Inflation:*** The rule must require that the value of the fruit and vegetable benefit reflect a cost of living adjustment. It is unfortunate that the cost of living adjustment in the proposed rule is optional. Without an annual cost of living adjustment, the vouchers would be worth less and would buy smaller amounts of fruit and vegetables each year as inflation increases – further falling behind the IOM recommendations.

Eliminate Inappropriate Standards and Size Requirements for Whole Grain Bread and Cereals:

- ***Adopt Appropriate Standards for Whole Grain Cereals to Assure Access to Healthy and Culturally Acceptable Choices:*** We applaud USDA for preserving the nutritionally important sugar limit and important iron requirements for WIC cereals. However, the new proposed cereal grain standards create a significant barrier for WIC participants to consuming whole grain cereals. The proposed whole grain cereal standard is not an appropriate whole grain standard for bran, corn and rice cereals and consequently it eliminates de facto all bran, corn and rice WIC cereals. This is especially problematic for WIC because Latino families prefer corn-based cereals (for example corn flakes). The inclusion of whole grain corn-based cereals will be necessary to maintain acceptable cereal choices for the 2.5 million Latino women and children in WIC. Also, both corn and rice cereals provide a healthy option for WIC participants with allergies and bran cereals are an excellent source of much-needed fiber for participants. Therefore, to ensure a selection of healthy whole grain WIC cereals, we recommend the use of revised standards based on the whole grain standards used in USDA's Healthier U.S. Schools guidelines plus two additional alternative criteria of 1) at least 3 grams fiber for bran cereals and 2) a minimum of 8 grams whole grains.

- ***The Allowable Size for a Loaf of Bread Must be Consistent with the Bread Available in Stores:*** WIC participants need a whole grain bread voucher for a loaf of bread that is consistent with the size typically sold in stores. Otherwise, the purpose of the whole grain change is subverted and the value of the food package shrinks further. In many markets, a mother may not be able to buy any whole grain bread with a 1 pound bread voucher. The proposed rule lumps the size of a loaf of bread and grains together as 1 pound (16 ounces). This is fine for the grains (i.e. rice), which are sold by the pound, but bread is sold by the loaf. Whole grain loaves are heavy, usually weighing more than 1 pound. According to data from Interstate Bakeries, 56 percent of whole wheat/whole grain loaves are sold in a 24 ounce loaf and 25 percent are sold in a 20 ounce loaf.

Remove the Prescription Requirement for Soy Milk and Tofu: We commend USDA for including the option of soy milk and tofu to provide popular high-calcium foods for WIC participants from a diversity of cultures. In addition, these foods are an important alternative for participants with milk allergies and lactose intolerance, a problem disproportionately affecting Latinos, African-Americans and Asian-Americans. The new packages will work well for women because they have free access to choosing soy milk/tofu. However, the proposed requirement for a medical prescription for children to get soy milk or tofu should be removed because it presents an insurmountable barrier for most low-income WIC families.

Keep Proposed Food Package Protections: We commend USDA for building in protections that safeguard the nutritional value of the new food packages for all participants by prohibiting state level cuts to the new food packages. In this proposed rule, USDA prohibits State WIC agencies from making across-the-board cuts in the food packages (a process known as “categorical tailoring”). This will guard against state pressures to dismantle the new WIC food packages. We agree with USDA that, given the carefully balanced food packages as designed by the Institute of Medicine, categorical tailoring is no longer necessary and would be detrimental. Individual WIC participants can have their WIC food package tailored for nutrition reasons or preference through the commonly used mechanism of “individual tailoring.”

Maximize Access to Farmers’ Markets: USDA’s inclusion of farmers’ markets as vendors for the new WIC food package fruit and vegetable vouchers is commendable, and, along with the continuation of the WIC Farmers’ Market Nutrition Program, will be helpful for WIC families. The rule should make clear that farmers’ markets qualify as eligible WIC vendors provided that they comply with the already well-established farmers’ market or WIC Farmers’ Market Nutrition Program procedures. WIC vendor requirements will need to allow farmers’ markets to participate as seasonal vendors and exempt them from stocking the full package.

Establish State WIC Food Package Advisory Councils to Bring a Diversity of Voices and Support to the Implementation Process: State WIC Food Package advisory councils should be established to help support and inform the planning and early implementation of the new WIC food package. To be most effective, the advisory councils should include WIC participants and representatives of the communities and organizations working to improve the health and well-being of the families served by WIC, such as

advocates, food bankers and other emergency food providers, immigrant groups, food policy councils, state chapters of nutrition and health associations, and local WIC agencies.

In summary, we strongly endorse the need for the new WIC food packages and urge USDA to proceed expeditiously to analyze the comments, make the necessary changes, and quickly move forward with the process of bringing a new, healthier food package to the more than 8 million women, infants and children in the WIC program each month. Thank you for this opportunity to share our support for the new WIC food packages and our recommendations to make it stronger still.

Sincerely,