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Patricia Daniels
USDA, Director, WIC
3101 Park Center Drive, Room 520
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Dear Ms. Daniels:

Thank you for this opportunity to provide comments on "Revisions to the WIC Food Packages." When making major changes to the food packages, a great deal hangs in the balance. The WIC food packages have been central to WIC's demonstrated success in improving the health and nutrition of the women, infants and children enrolled in the program. The success of the WIC food packages is dependent on a complex set of interactions. This is not to say that improvements can't be made. But in the context of limited funding, gains in one area can easily lead to losses in other important areas. For this reason, we believe that the full range of factors affecting the nutritional, incentive and food security value of the food packages needs to be taken into account in revising the WIC food packages. With that in mind, we offer the following recommendations:

I. WIC Food Package Foods: Building Blocks for Good Nutrition and Health

Retain Current WIC Foods

All the types of food currently in the WIC food packages, including iron-fortified infant formula, infant cereal, milk, iron-fortified breakfast cereal, cheese, Vitamin C-rich fruit and vegetable juices, beans, peanut butter, eggs, and (for breastfeeding women,) carrots and tuna fish, should be retained because each type of food makes an important contribution to the nutritional content of the package. In addition, these foods are acceptable, practical, accessible and cost-efficient.

Add New WIC Foods

It would be a step forward to broaden the types of foods offered in the standard WIC food packages by adding a fruit and vegetable category and more high calcium food choices including yogurt and soymilk. The problem, however, lies in possible trade-offs. USDA's request for cost neutral comments was clear: the addition of new food categories should be offset by food package reductions. Since the current WIC food packages offer much-needed nutrients and do not provide unhealthy amounts of any foods, there is no imperative to lower the amount of any WIC food for health reasons. The best way of offering fruits, vegetables, yogurt and soymilk to low-income families through WIC is to secure additional Congressional appropriations to cover the additional costs.

Foods Not to Add

The addition of low-cost starches such as bread, rice and pasta would not improve the WIC food packages. Since these low-cost foods are consumed as staples and would be purchased and consumed regardless of availability from WIC, this kind of addition is unlikely to have a positive impact on the health or nutritional status of WIC clients.

Expand WIC Cultural Food Package Options

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The rules should better accommodate cultural food preferences through an expansion of USDA's current cultural food package regulatory provisions to allow for a food-package to food-package based system of substitution of nutrient-dense culturally appropriate foods. This would allow for example, a cultural food package that contained tofu and other foods acceptable to a child newly immigrated from Asia. However, it is important to emphasize that this system would not allow the child receiving the cultural food package to be short-changed – the nutritional and economic value of the children's cultural WIC food package must be equal to the value of the standard children's WIC food package.

II. Strong Federal WIC Food Package Standards Protect Benefits

Preserve Emphasis on Key Nutrients in WIC Food Packages

The WIC food packages should continue as a special supplement of nutritionally dense foods that supply key nutrients important to the health and development of pregnant women, new mothers, infants and children. The current key nutrients – iron, calcium, Vitamins A and C, and protein – should be retained. The B vitamin, folate, should be added as a key nutrient based on research revealing its importance in preventing birth defects. Other nutrients should be considered based on the findings of the Food and Nutrition Board WIC review.

Protect Nutritional Integrity of Food Package by Retaining Strong Nutritional Standards

Food package revisions should protect the nutritional integrity of the WIC food packages by maintaining the current stringent nutrition standards for WIC foods. These standards include high requirements for iron in cereals and Vitamin C in fruit and vegetable juices, as well as limits on sugar and fat, including prohibition of high sugar cereals and sweetened juice or milk.

Retain Current Targeting of WIC Food Package Benefits

The current fair and effective system of targeting WIC food package benefits should be retained. For example, we oppose reducing, as some have suggested, the size of the WIC food package for young children by shifting resources toward other food packages. Reducing the size of the WIC food package for young children will diminish WIC's positive impact on the health and nutritional status of children enrolled in the program. The negative impact of reducing the nutritional support for these nutritionally at-risk young children during one of their most crucial periods of physical and cognitive growth and development could last a lifetime. Less WIC food for these young children will also result in more non-WIC foods, which according to the recent Mathematica study, FITS, all too often include unhealthy junk food such as french fries, sweetened drinks and candy.

The WIC food package functions not just as a source of nutritional support but also as an incentive to bring clients into the WIC clinic and engage them with the clinic's nutrition education and referrals to health care. This incentive is important: if parents decide not to enroll their children in WIC because the children's food package is too small to be worth the effort, then the children can't reap any of the program's benefits.

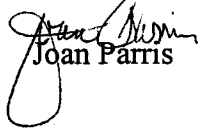
III. WIC Food Package Evaluation Should Be Comprehensive

Since the food packages were last reviewed, there has been an explosion of research and recommendations related to nutrition and health. The planned review should include an evaluation of the current health and nutritional needs, dietary habits and food preferences of the WIC population as a basis for understanding how to apply the new science to the WIC food packages. This understanding should be used to make revisions that maximize the nutritional,

food security and incentive value of the packages and, consequently, WIC's ability to continue to offer foods that empower WIC families to make the best choices for their health.

Thank you for this opportunity to share our views.

Sincerely,


Joan Parris