

# OHIO DEPARTMENT OF HEALTH

GSA-01

246 North High Street  
Post Office Box 118  
Columbus, Ohio 43216-0118

Telephone: (614) 466-3543  
www.odh.state.oh.us



BOB TAFT  
Governor

J. NICK BAIRD, M.D.  
Director of Health

November 13, 2003

Patricia N. Daniels, Director  
Supplemental Food Programs Division  
Food and Nutrition Service  
United States Department of Agriculture  
3101 Park Center Drive – Room 520  
Alexandria, VA 22302

Subject: Revisions to the WIC Food Packages

Dear Ms. Daniels:

This letter provides the Ohio WIC program's comments and recommendations on the Miscellaneous Provisions Proposed Rule published in the *Federal Register*, Volume 68, Number 178, on September 15, 2003.

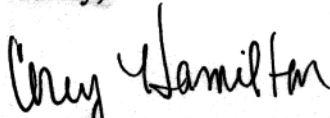
Ohio is in favor of the proposed changes. In particular, Ohio strongly agrees to add fruits and vegetables, while reducing juice, all year long. Ohio agrees with the proposal to allow states to add culturally appropriate foods as long as descriptions for some items such as soy milk, which can have quite a variation in content (sugar, vitamins), are defined. Please reconsider the added foods for breastfeeding women. Ohio does not believe that adding carrots and tuna is an incentive to exclusive breastfeeding, nor does Ohio believe that it is sending the right message - that breastfeeding mothers need more of these nutrients than the other women categories. Adding fruits and vegetables to the general food package would take care of this issue.

With respect to adding fruits and vegetables for all participants, Ohio recommends that the Farmers' Market Nutrition Program (FMNP) be made part of the WIC program. The FMNP needs to be streamlined and simplified so that the dollars can be used for participants and subsequently farmers. FMNP food dollars need to be used for providing fruits and vegetables via the WIC food package changes which is consistent with WIC nutrition education. The minimal FMNP administrative dollars should be made available in the overall WIC grant to cover the extra farmer contracting and associated costs. The separate WIC and FMNP program funding, regulations, and requirements which significantly increase administrative costs need to be eliminated and consolidated into a single WIC program.



Thank you for the opportunity to review and comment on these proposed regulation changes, and for your consideration of the Ohio WIC program's comments and recommendations. We are particularly hopeful that these regulatory changes can be implemented soon.

Sincerely,



Corey Y. Hamilton, MS, RD, LD, Chief  
Bureau of Nutrition Services

CYH/PAP/pap

Cc: Sandra G. Slayton, Regional Director, Special Supplemental Nutrition Programs  
David P. Schor, MD, MPH, FAAP, Chief, Division of Family and Community  
Health Services