

STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

DEPARTMENT OF HEALTH & SOCIAL SERVICES

OFFICE OF CHILDREN'S SERVICES

3601 C STREET, SUITE 934
P. O. BOX 240249
ANCHORAGE, ALASKA 99524-0249
PHONE: (907) 269-3400
FAX: (907) 269-3465
www.hss.state.ak.us/ocs/

December 8, 2003

Patricia Daniels
Director, Supplemental Food Programs Division
Food and Nutrition Services, USDA
3103 Park Center Drive, Room 520
Alexandria, Virginia 22302

Re: Revisions to the WIC Food Packages, 7 CFR Part 246

Dear Ms. Daniels,

The State of Alaska WIC Program and the Alaska Association of WIC Coordinators (AKAWICC) are thankful for the opportunity to comment on Public Notice 7 CFR Part 246, Revisions to the WIC Food Packages. Alaska WIC and AKAWICC have worked jointly to formulate a response to this important matter. AKAWICC's membership consists of local WIC agencies within the State of Alaska who are members of the National WIC Association. Each local WIC agency is represented by the local agency WIC Coordinator.

Our comments focus on questions 1, 2, 3, 5, 9, and 10 raised in the Federal Register notice 7 CFR Part 246.

Question 1: Please indicate what elements of the WIC food packages you would keep the same and why?

The **only** elements of the WIC food packages we would keep the same are the classifications for Food Packages III, IV, V, VI and VII because it groups these types of clients' food prescriptions according to their physiological stages and nutritional needs, i.e., Children/women with special dietary needs, children 1-5 yrs., pregnancy, breastfeeding or postpartum.

Question 2: What changes, if any, are needed to the types of foods currently authorized in the WIC food packages? If you recommend additions or deletions to the types of foods currently offered, please discuss recommended quantities and cost implications.

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Recommended Changes for WIC Food Packages (I) and (II):

(I)	Infants 0-6 months	Infant Formula (if not breastfed) (Delete infant cereal at 4 months)
(II)	Infants 7-12 months	Infant Formula Infant Cereal¹ Juice ²/Fruits & Vegetables (Fresh/Canned or Frozen)

Current WIC Food Packages I and II no longer follow evidence-based infant feeding nutrition guidelines. Federal regulations 7 CFR Part 246 should state and stipulate the American Academy of Pediatrics' (AAP) recommendations 1, 6, and 7 and the National Association of WIC Directors (NAWD) WIC Food Prescription Recommendations Position Paper³, recommendation 1c and 1b.

AAP Recommended Breastfeeding Practice Number 1:

"Human milk is the preferred feeding for all infants, including premature and sick newborns, with rare exceptions."⁴

AAP Recommended Breastfeeding Practice Number 6:

"Exclusive breastfeeding is ideal nutrition and sufficient to support optimal growth and development for approximately the first 6 months after birth."⁵ The AAP also includes under this recommendation, "Gradual introduction of iron-enriched solid foods in the second half of the first year should complement the breast milk diet."⁶

AAP Recommended Breastfeeding Practice Number 7:

"In the first 6 months, water, juice, and other foods are generally unnecessary for breastfed infants."⁷

NAWD WIC Food Prescription Recommendations Position Paper⁸, Recommendation 1c:

Exclude juice from the infant food package or reduce the total quantity of juice and prescribe it only when the infant is developmentally able to drink it from a cup. Fruit juice is not an essential component in an infant's diet, a conclusion by the Center for Nutrition Policy and Promotion.⁹

NAWD WIC Food Prescription Recommendations Position Paper, Recommendation 1b:

Offer choices of fruits and vegetables-fresh, frozen or canned-in addition to or in partial or full replacement of juice for all women and children.

Fruits and vegetables are more expensive in Alaska, especially in the Bush, and are frequently lacking in the diets of lower income infants, children, and pregnant and

breastfeeding women in our state. Given the high rates of diet-related disease in Alaska,¹⁰ restrictions of fruits and vegetables are unacceptable. For all Alaskans the average frequency of fruits/vegetables consumption per day has decreased from 26.2 % in 1996 to 22.8% in 2002.¹¹ It is important our food packages include fruits and vegetables that are both available in Alaska and culturally acceptable.

During the 1999 Alaska Association of WIC Coordinators (AKAWICC) Meeting, the Alaska Pregnancy Risk Assessment Monitoring System (PRAMS) Coordinator reported the following written comments by postpartum WIC women:

“WIC is great, but mothers need access to more affordable or subsidized fruits & vegetables, especially during the winter months. I found that part of my pregnancy diet was lacking, especially in comparison to my previous pregnancy.”
(1999 PRAMS mom)

Recommended Changes for WIC Food Packages (III), (IV), (V), (VI), and (VII)

- **Recommend following the National WIC Association’s (NWA) *Culturally Sensitive Food Prescription Recommendations: Examples of Culturally Sensitive WIC Food Prescriptions including fresh, frozen and canned fruits and vegetables for all WIC women and children.***¹² We request that the list of foods allowed by WIC be expanded to allow foods that will help improve the health of Native Alaskans and other minorities. Some of the foods provided by WIC have negative health effects for these groups, and other foods that they need are not allowed by WIC. The WIC food packages in these categories contain large amounts of milk, which causes painful gastrointestinal problems for many Alaskan minorities. It does not contain fruits, vegetables or grains, which help to reduce the risk of cancer, heart disease and diabetes, which are significant problems among minorities in Alaska. We want to reduce milk, other high fat foods and juice in the current WIC food packages, and add nutritious, low cost items such as fruits, vegetables, more salmon and tuna, grains and yogurt.
- Recommend WIC Food Packages (III), (IV), (V), (VI), and (VII) changes based on the NAWD WIC Food Prescription Recommendation 1d¹³:
 - Reduce the maximum quantity of milk for children. Offer lower fat milks as the standard milk for all women and children over 2 years of age. Allow for the use of alternative milk/calcium-rich food sources, such as tofu, soymilk, or yogurt as replacement for milk and restrict the maximum allowable amount of cheese for all women and children.
 - Recommend WIC Food Packages (III), (IV), (V), (VI), and (VII) changes based on the NAWD WIC Food Prescription Recommendation 1e¹⁴:
 - Offer beans/peas (legumes)-canned or dried to all women and children.
- Recommend WIC Food Packages (III), (IV), (V), (VI), and (VII) changes based on the NAWD WIC Food Prescription Recommendation 1e¹⁵:
 - Reduce the quantities of protein-rich foods for children. Allow substitution

between protein-rich foods items such as eggs, peanut butter and other alternative protein sources for all women and children.

During the 1999 Alaska Association of WIC Coordinators (AKAWICC) Meeting, the Alaska Pregnancy Risk Assessment Monitoring System (PRAMS) Coordinator reported the following written comments by postpartum WIC women:

“I would like to see WIC pay for soy products such as soymilk (not formula) and tofu rather than only cow’s milk and cheese...

We are vegetarian by choice because we believe it is healthier. I would also like to see organic milk, eggs & cheese approved. WIC improvements: Grape nuts approved! Coupons for farmer’s market!” (1999 PRAMS mom)

Several key features of the proposed food package changes are of significant benefit to Alaskans¹⁶.

- Calcium-fortified soymilk does not have to be refrigerated until ready to use. This is beneficial, as poor refrigeration is common in the Alaskan bush community.
- Allowing canned beans to be used can decrease preparation time and increase usage for a low cost that is high protein and iron.
- Decreasing or eliminating juice and replacing it with nutrient-dense, low calorie vegetables and fruit address the increasing incidences of obesity and diabetes in the native populations. These are problems seen in many Alaskan villages. WIC should provide foods that are consistent with dietary recommendations related to these health problems

The Alaska WIC Program proposes a food for food substitution of certain fruits and vegetables for some of the fruit juice to improve the nutritional value of this package. The proposed substitution is comparable to the current juice in Food Package IV for Alaska. The amount of juice will be reduced from six cans to two cans, and choices of certain canned, frozen and fresh fruits and vegetables will be added. The proposed substitutions for juice are vegetable choices of frozen broccoli or frozen cauliflower, canned tomato soup, fresh cabbage or fresh potatoes, and fruit choices of frozen peaches, canned pears, unsweetened applesauce or fresh oranges.

The average cost in Alaska of the six cans of WIC juice is \$18.72. The cost of the proposed substitution will average \$18.73. The Vitamin C content of the substitutions exceeds that of WIC juice. The average Vitamin C content of 100 ml of WIC juice is 30 mg. The average Vitamin C content of 100 gm of the proposed vegetable and fruit choices is 50 mg. The nutritional values of the proposed substitution for other key nutrients are comparable. The number of servings in the proposed substitute food package will exceed the number of servings in the current Food Package. The number of servings of juice in the current Food Package IV is 46. The number of servings in the proposed substitution will be 65 servings. In support of this proposal, the following provides information on cost and recommended quantities implications and proposed food package changes.

Cost and Recommended Quantities Implications

The average cost of the fruits and vegetables proposed substitutions for juice is comparable to the WIC approved fruit juice in Alaska. A price survey was conducted among four corporations and the military commissaries for the proposed fruit and vegetable items. This price survey represents 99 vendors which or 46% of all WIC vendors in Alaska.

The average prices for the proposed fruits and vegetables were calculated as weighted price averages based on the potential number of participants redeeming warrants at various vendors in rural and urban areas, to account for price differences among them, based on size and location. Fresh fruit and vegetable prices were also based on average annual cost to reflect seasonal changes in addition to these criteria. Table 1 provides the cost of the proposed food package with container size and number of servings.

Vendors say they anticipate costs of these fruits and vegetables will go down from the prices they provided us for this proposal, if WIC adds these foods to the approved WIC food list. This is because the anticipated WIC purchases will increase demand, causing prices to go down, particularly in rural areas.

Table 1 Cost of Proposed Food Package with Container Size and Number of Servings

Food Item	Average Cost (\$)	Proposed Container size	Number of servings per container
WIC Juice, average	6.24	2 (46 oz) cans	15
Vegetable Choices			
Broccoli, frozen	2.09	1 lb	5.8
Cauliflower, frozen	2.10	1 lb	6.9
Tomato soup, canned, condensed	1.89	1 (26 oz) can	11.7
Cabbage, fresh	3.33	3 lbs	24.5 ^a
Potato, fresh	3.54	5 lbs	22.7 ^b
Fruit Choices			
Peaches, frozen	2.58	1 lb	3.6
Pears, canned	1.97	15 oz (425g)	3.5
Unsweetened applesauce, jar	3.04	48 oz (1357g)	10.0
Orange, fresh	4.44	3 lbs	11.0 ^c

^a20% refuse

Proposed Food Package

The proposed substitution of fruit juice for fruits and vegetables in Food Package IV consists of a combination of fruit juice, and canned/frozen/fresh fruits and vegetables. The proposed food package consist of 2 cans WIC approved juice, two vegetable choices and two fruit choices. The vegetable choices are 2 - lbs of frozen broccoli or cauliflower; 1 - 26 oz canned tomato soup; 3 - lbs of cabbage, fresh and 5 - lbs of potatoes, fresh. The fruit choices are 1 – lb frozen peaches; 1 - 15 oz canned pears; 1- 48 oz jar of unsweetened applesauce and 3 - lbs oranges, fresh.

The average cost of providing 276 fluid ounces of WIC Juices with 46 serving portions, as specified in the Federal Guideline, is \$18.72. The average cost for the proposed food package substitution is \$18.73 with 65 serving portions. The following table provides a comparison of the quantity, cost and number of serving portions for the current and proposed food package.

Table 2 Comparison of Current and Proposed Food Package Juice Substitutions

		Cost (\$)	Vitamin C (mg)	No of servings
Current food pkg	6 WIC approved juices (8160 ml)	18.72	2448	46
Proposed pkg				
A. WIC Juice	2 cans WIC juices	6.24	816	15
B. Vegetable choices	Two choices of any of the following:			
	2 pounds frozen vegetables – (broccoli or cauliflower)	4.19	478	12.7
	1 – 26 oz canned tomato soup, condensed (737 g)	1.89	391	11.7
	3 pounds cabbage, fresh (edible portion = 1090 g)	3.33	351	24.5
	5 pounds potatoes, fresh (edible portion = 1703 g)	3.54	335	22.7
	Average of 2 vegetable choices	6.48	778	35.8
C. Fruit choices	Two choices of any of the following:			
	1 – pound frozen peaches	2.58	428	3.6
	1 – 15 oz canned S & W pears (425 g)	1.97	189	3.5
	1 – 48 oz jar unsweetened applesauce (1357 g)	3.04	597	10.0
	3 pounds fresh oranges (edible portion = 994 g)	4.44	529	11.0
	Average of 2 fruit choices	6.02	872	14.0
	Total for proposed pkg	18.73	2465	65

Question 3: Should the quantities of foods in the current WIC food packages be adjusted? If yes, by how much and why?

Yes, the quantities of foods in the current WIC food packages should be adjusted.

The WIC Programs offers too much milk. The monthly allowance of WIC foods includes 24 quarts of milk for children and 28 for women, enough for over three 8-ounce glasses a day for every participant. This is a serious problem for Native Alaskans and other Alaskans who suffer from lactose intolerance. It is estimated that about 50% of Native Alaskans and 90% of Alaskans of Asian origin suffer from the condition. It is imperative there be more and better alternative food choices high in calcium for people with documented lactose intolerance – e.g., soy milk, tofu, yogurt, dark green leafy vegetables.

Iron deficiency anemia is a serious problem among Native children and other minorities in Alaska. The anemia rates among Native children are more than twice the national average. The consumption of more than 24 oz of whole cow's milk daily after the first year of life as currently provided in the WIC food package does nothing to help treat this problem. Milk is a poor source of iron and does not help aid in iron absorption. The CDC to determine factors contributing to anemia and identify recommendations for potential interventions conducted a study of 128 Alaska Native children aged 1-5 years. Height, weight, general health, and food intake variables were addressed. Medical records were reviewed. Blood and stool samples were tested. The study showed an anemia rate of 17% (consistent with rates elsewhere in the region). Iron deficiency was strongly associated with anemia. Food histories indicated that the children were consuming close to the recommended 10 mg of iron a day, but children with anemia had a significantly lower intake of foods that enhance iron absorption. The study was published by the Centers for Disease Control in the August 20, 1999 MMWR.

- Recommend WIC Food Packages (III), (IV), (V), (VI), and (VII) changes based on the NAWD WIC Food Prescription Recommendation 1d¹⁷:

Reduce the maximum quantity of milk for children. Offer lower fat milks as the standard milk for all women and children over 2 years of age. Allow for the use of alternative milk/calcium-rich food sources, such as tofu, soymilk, or yogurt as replacement for milk and restrict the maximum allowable amount of cheese for all women and children.

Question 5: Can the WIC food packages be revised to have a positive effect on addressing overweight concerns? If so, how?

Yes, the WIC food packages can be revised to have a positive effect on addressing overweight concerns following recommendations in the National WIC Association *Culturally Sensitive Food Prescription Recommendations: Examples of Culturally Sensitive WIC Food Prescriptions*. Specifics outlined in this document could benefit all WIC clients especially by including fresh, frozen and canned fruits and vegetables for all WIC women and children.¹⁸

Alaska WIC agrees with the American Academy of Pediatrics (AAP) policy statement that excess juice for healthy children may be a contributing factor in childhood obesity and early dental carries when misused.

Alaska WIC supports the National Association of WIC Directors (NAWD) WIC Food Prescription Recommendations Position Paper, Recommendation 1b to:

Offer choices of fruits and vegetables-fresh, frozen, or canned-in addition to or in partial or full replacement of juice for all women and children.

WIC allows juice, but not fruit. Alaskan minority children, especially Native children, have a higher prevalence of dental decay, overweight, risk factors for later development of diabetes, and otitis media (middle ear infection). Excessive juice, especially in a baby bottle, is often a contributing factor. Excessive juice intake can cause diarrhea, and is associated with obesity. Pediatricians often tell parents to give small children fruit instead of juice. WIC should provide some fruit in partial replacement of so much juice, as recommended by doctors.

For all Alaskans the average frequency of fruits/vegetables consumption per day has decreased from 26.2 % in 1996 to 22.8% in 2002.¹⁹ Fruits and vegetables are more expensive in Alaska, especially in the Bush, and are frequently lacking in the diets of lower income infants, children, and pregnant and breastfeeding women in our State. Given the high rates of diet-related disease in Alaska, WIC restrictions against fruits and vegetables are unacceptable. It is imperative WIC be able to offer more healthful food choices to our clients and provide the leadership in good nutrition.

Question 9: How can WIC food packages best be designed to effectively meet nutritional needs in culturally and ethnically diverse communities?

The National WIC Association *Culturally Sensitive Food Prescription Recommendations: Examples of Culturally Sensitive WIC Food Prescriptions* was developed to address changes in the current food packages. It is a well researched, supporting the rationale and justification of the USDA food prescription guidelines. Consider the recommendations in order for WIC's role, as the leading public health nutrition program is to continue to be creditable. If WIC foods are intended to be supplementary to an overall diet, cultural food preferences or food traditions must be considered in designing the WIC food benefit.

The culturally diverse population of Alaska includes people from the entire Pacific Rim as well as an indigenous native population. Dietary patterns are as diverse as the population. Rice and soy based diets are common. Because of this, the standard WIC package is often not consumed nor physically tolerated. Lactose intolerance and non-cereal based rice diets are frequently seen in local WIC clinics. Flexibility to tailor the WIC food packages will encourage client participation in WIC, consumption of the WIC foods offered and help to improve the overall health of our WIC clients.

WIC foods should make a significant nutritional contribution to the diets and health of program participants. The current WIC foods do not meet and are not culturally acceptable to our diverse population. It is imperative that WIC be more flexible to provide foods to clients that they can acquire, are physically able to consume, and are culturally acceptable to get the maximum nutritional benefits.

Many American Indian and Native Alaskans are lactose intolerant and they are reluctant to consume certain approved WIC foods that need to be replaced/substituted for better acceptance. This is a barrier to participation.

Allow states to offer regionally or locally available, culturally appropriate nutritious foods that are affordable and can be a part of their dietary patterns that contribute to life-long good health.

Question 10: Should WIC State agencies be afforded more or less flexibility in designing WIC food packages? Please explain.


In a recent survey of Alaska families living in five rural villages, 37% of families surveyed reported that they faced recent food insecurity.²⁰ A total of 15% of families reported periods of hunger when they truly did not have enough to eat. The frequency of food insecurity and hunger that was reported in this small Alaska study is alarming. Statistically, these rates are four times higher than national levels of food insecurity, which the USDA has recently published at 8.7%, with hunger at 2.8%. Providing culturally acceptable foods to families in these Alaska rural communities could help decrease this high rate of food insecurity.

The WIC State agencies should be afforded more flexibility in designing WIC food packages. The Alaska WIC program plays a vital role in assuring that Alaska pregnant women, infants and children living in our state have enough healthy food to eat and sufficient calories to grow properly and to deliver full-term, healthy babies. Flexibility would allow the Alaska WIC program to adapt the current package as appropriate for areas suffering from economic disaster, high rates of iron deficiency anemia, and related factors.

Thank you for the opportunity to provide comments. The time is long overdue for the WIC food packages to change to better reflect dietary recommendations based on current scientific research. It damages WIC's credibility as a health program if we cannot adapt to current recommendations. We appreciate your efforts in achieving these changes as soon as possible.

Please contact our organization if you need any further comment or recommendations on the Alaskan perspective of this essential WIC Program issue.

Sincerely,



Fatima S. Hoger, MS, RD, LD
Alaska WIC Nutritionist

Cc: David Brown, RD, MPH, LD
The Alaska Association of WIC Coordinators President
Anchorage Reading File
Juneau Reading File

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- ¹¹ National Center for Chronic Disease Prevention & Health Promotion. "Alaska Behavioral Risk Factor Surveillance System" November 2002.
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