

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S. Laboratory Services Division
Denver, Colorado 80246-1530 8100 Lowry Blvd.
Phone (303) 692-2000 Denver, Colorado 80230-6928
TDD Line (303) 691-7700 (303) 692-3090
Located in Glendale, Colorado
<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

December 8, 2003

Patricia Daniels
Director, Supplemental Food Programs Division
Food and Nutrition Service, USDA
3101 Park Center Drive, Room 520
Alexandria, VA 22302

Dear Ms. Daniels,

Thank you for the opportunity to comment on the Revisions to the WIC Food Packages. The supplemental food package is integral to the health of the pregnant, postpartum, and breastfeeding women, infants and children that WIC serves. Coupled with nutrition education and breastfeeding support, the WIC foods improve health outcomes in our population. Although WIC allowable foods have provided keys nutrients for growth and development, it is time to revise the food packages to more broadly reflect the current knowledge of nutrition as well as the culturally diverse populations we serve. We offer the following recommendations:

Please retain the following elements of the current food package

1. Retain WIC infant and child-adult cereals with existing amounts, sugar, and iron levels. Cereals with dried fruit must conform to the 6-gram sugar requirement.
2. Retain the requirement that juice be 100% juice fortified at existing levels of vitamin C.

Please make changes in the types of foods in the currently authorized foods

1. Allow the substitution of dried beans with canned beans (no added bacon or pork).
2. Remove low-iron infant formula.
3. Allow the substitution of canned salmon and canned chicken for tuna.
4. Add green and yellow vegetables (canned, frozen, and fresh) as authorized foods for children and women (this would be in addition to carrots allowed for the exclusively breastfeeding women).
5. Add calcium-fortified soymilk as a replacement for cow's milk.
6. Consider the addition of yogurt or tofu.

Please make changes in the following quantities of currently authorized foods

1. Reduce eggs from 2 ½ dozen to 2 dozen.
2. Do not provide juice to infants. Start juice at 12 months of age.
3. Reduce juice for children (ages 1-5) to one approximately four-ounce serving per day or 120 ounces per month. Reduce juice for adult women to one approximately six-ounce serving per day or 180 ounces per month.
4. Reduce milk to 16 quarts for children and postpartum women and to 20 quarts for pregnant and breastfeeding women.
5. Reduce cheese to 1 pound for children and women.
6. Do not reduce formula from the current amount of reconstituted ounces. Allow rounding up to accommodate varied and changing can sizes.

LMC received
DEC 17 2003

The following nutrients should be priorities in the WIC foods

1. Retain protein, calcium, vitamin A, vitamin C, and iron.
2. Add folate, vitamin B6, and fiber.

Addressing overweight through the WIC food package

1. Increasing the consumption of vegetables, beans, and fiber may be helpful to overweight concerns.
2. Some states (e.g., Colorado) have established lower-fat milk as a standard (whole milk is available by request).
3. Reducing juice and cheese.

Flexibility in the food package

1. Participants should have the ability to choose within WIC food categories (e.g., type of cereal, peanut butter for beans, the type of vegetables, or salmon/chicken for tuna).

Meeting the cultural and ethnic needs of the population

1. Soymilk, vegetables, plain yogurt or tofu may help to meet cultural and ethnic needs.

State flexibility in designing food packages

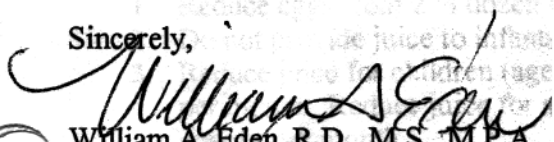
1. States should retain the flexibility to select foods it will offer from the WIC-authorized foods.
2. States should be able to request a change or inclusion to the food package from USDA (as was once done).

Other comments

1. Decisions on the revised WIC foods should take into account: cost, manageability in stores, availability of foods throughout the country and throughout the year, promotion of good health practices (e.g., reduce saturated fat), congruency with nutrition education messages, appeal and simplicity.
2. A reasonable period for implementing the new food package is needed (12-18 months) given the need for MIS/EBT systems and nutrition education modification, and vendor and local training.
3. Since this is a supplemental food program, the food package must not be over-burdened with too many additional food items or categories, making it hard to implement, maintain and assure integrity.
4. Do not allow weight loss products, salad bar vegetables, sports drinks, energy bars, instant breakfast drinks, or any such product not in keeping with the mission of the Program.

Once again thank you the opportunity to offer comments.

Sincerely,


William A. Eden, R.D., M.S., M.P.A.
Director, Nutrition Services

ls