



The Commonwealth of Massachusetts  
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GSA-14

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December 12, 2003

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

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

Dear Ms. Daniels:

Thank you for the opportunity to comment on Public Notice 7 CFR Part 246, Revisions to the WIC Food Packages. The Massachusetts WIC Program strongly supports efforts to improve the WIC food packages and expand the foods offered by WIC. We believe that this significant enhancement is long overdue and is critical to the on-going success of the WIC Program.

The Massachusetts WIC Program supports the National WIC Association's (NWA) position that the WIC food prescription is to:

- Help participants establish dietary patterns that promote life-long good nutritional health
- Provide the tools by which participants apply the nutritional knowledge gained from counseling and education to make dietary changes to improve their nutritional health
- Provide a reliable source of supplemental food

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The Massachusetts WIC Program supports NWA's position papers, "*NAWD WIC Food Prescription Recommendations*" and "*NWA Culturally Sensitive Food Prescription Recommendation*," published in 2000 and 2003 respectively (see attached papers). Recommendations included in both papers will assist WIC participants in establishing dietary patterns necessary to maintain life-long good nutritional health, as well as provide States the ability to accommodate the cultural preferences and dietary consumption patterns of the populations they serve.

Although the WIC food packages have been reviewed several times, there have been no significant changes since the inception of WIC 30 years ago. The current WIC food packages have been retained despite these reviews as a result of strong political and industry pressures. Instead, WIC food packages should respond to the health and nutrition issues our nation's families. As such, serious revisions to the WIC food packages and allowable WIC foods are warranted.

Massachusetts strongly encourages USDA-FNS to make the following critically needed changes to the WIC food packages and allowable WIC foods:

1. Ensure the WIC food packages are consistent and compatible with the US Dietary Guidelines for Americans by offering a variety of fruits, vegetables and fiber-rich foods and limiting saturated fat, dietary cholesterol, sugar and salt.
2. Ensure the WIC food prescriptions are consistent with nutritional recommendations from recognized authorities including the American Dietetic Association, American Academy of Pediatrics, National Academy of Science's Institute of Medicine, etc..
3. Ensure WIC food packages provide a minimum level of nutritional value (i.e. 65% of the RDA/DRl of the current target nutrients) and additionally, folic acid. Base the nutrient content of WIC food prescriptions on the overall contribution of all foods offered in the prescription.
4. Give States the flexibility to provide alternative foods that offer WIC's target nutrients for growth and development, such as soymilk, yogurt, peanuts, canned chicken, fruits, and/or vegetables. Selections should be based on regional availability, participant preferences, cultural acceptability, food cost and administrative feasibility. Food prescriptions can then be designed to target special nutrition and health considerations, such as overweight, obesity, allergies, and diabetes.
5. Give States the ability to a) manage their overall food cost rather than imposing restriction of a food-for-food or package-for package cost comparison, and b) identify and implement individual food cost containment.

The WIC Program is at a crossroad – prioritize the current and future health of our children or continue to gratify political and business interests. It is incumbent upon

USDA-FNS to respond positively and constructively *now* to this review by supporting and implementing changes to the WIC food packages. Providing WIC food packages that are valued and consumed by our families is fundamental to WIC's success as the premier community-based nutrition program in this country. The growth and development of our nation's children, together with the reduction in long-term health care costs, should be the driving force and principle behind changes to the WIC food prescriptions.

Again, we thank you for this opportunity to comment and look forward to this opportunity to assist all our WIC families in establishing healthy dietary patterns.

Sincerely,



Mary Kelligrew Kassler  
Director  
Massachusetts WIC Program



Jan Kallio  
State Nutrition Coordinator  
Massachusetts WIC Program

CC Robert Mulvey, USDA/FNS/NERO