



Jeb Bush
Governor

John O. Agwunobi, M.D., M.B.A.
Secretary

December 15, 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:

The Florida Department of Health, Bureau of WIC and Nutrition Services appreciates the opportunity to respond to the request for comments on Public Notice 7 CFR Part 246, Revisions to the WIC Food Packages. The Florida WIC Program is in agreement with the National WIC Association's recommendations that the WIC food package must offer foods that are acceptable to the diverse clients that are served by the WIC program in our state, as well as across the country. Additionally, we support improvements in the WIC food package that will ensure that the food package is current with nutrition science and that the foods will help participants to establish healthy life-long nutrition patterns that promote good health for their families.

We believe that the elements of the WIC food packages should be based on the following:

1. Foods should be acceptable to WIC participants while adhering to recommendations set forth in the Food Guide Pyramid and the U.S. Dietary Guidelines for Americans such as low sugar, low fat, and high fiber.
2. Foods should include target nutrients commonly found to be inadequate in the diets of the WIC population to include: protein; iron; calcium; zinc; magnesium; and vitamins A, C, B6, and folic acid.
3. Foods should reflect the cultural and ethnic dietary consumption patterns of participants served.
4. Foods should be nutrient dense with cost-efficient value.
5. Foods should be packaged in convenient and economical sizes that can be easily partitioned for daily consumption.
6. Foods should be readily available at retail vendors year round.
7. Foods should be administratively manageable with limited confusion for participants, employees, and vendors.

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We believe the following changes should be considered in the types of foods authorized in the WIC food packages:

1. There should be a choice of grain products in addition to, or in partial replacement of, cereal for all women and children. Consideration should be made as to the iron content of these replacement foods.
2. There should be a choice of fruits and vegetables in addition to, or in partial or full replacement of, juice for all women and children.
3. There should be provisions for the use of alternative milk/calcium-rich food sources, such as soymilk and yogurt, as replacement for cow's milk/cheese for all women and children.
4. Beans/peas (legumes) should be available in either canned or dried forms for all women and children.
5. There should be provisions for the substitution of the WIC program's protein-rich food items such as eggs, peanut butter, beans/peas with other alternative protein sources such as canned tuna, salmon, and chicken for all women and children.
6. Infant food packages should exclude juice.
7. Child food packages should contain less milk/cheese.
8. Children over the age of 2 and women should receive low-fat milk as the recommended standard food package. Other milk products (reduced fat or whole milk) could be made available when appropriate.
9. There should be alternative foods available for participants with food allergies.

Thank you again for the opportunity to express our opinion regarding Revisions to the WIC Food Packages. The Florida WIC Program believes that by making healthful changes to enhance the WIC food package, USDA will improve the WIC nutritionists' flexibility to meet individual participants' needs. It will also assure that the WIC program continues as a premier public health nutrition program and is on the cutting edge in the efforts to positively impact the national obesity epidemic. Please feel free to contact our office if you have any questions or have the need for additional information. We can be reached at (850) 245-4202.

Sincerely,



Deborah Eibeck, MS, RD, LD
Chief, Bureau of WIC and Nutrition Services