



Vermont Department of Health
Division of Community Public Health

Agency of Human Services

December 15, 2003

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

Dear Ms. Daniels,

At this time it is difficult to make specific comments without knowing the results of the Institute of Medicine's work on the WIC Food Package. It is however, worth stressing a number of points related to the issues in this notice.

First, maximizing food package flexibility to meet the changing needs of participants is critical to bringing the food package rule up to date with current cultural demands and nutritional needs. The rule must allow for revisions based on changing science and participant preference in an easy, straight forward method that can be implemented by individual states as the need arises, without a lengthy application and approval process.

We have made specific comments below related to questions posed in the notice.

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

We support the general food categories, but encourage USDA to expand categories to include more culturally appropriate items and to allow more flexibility. The current requirement for cost neutrality on a per item basis unduly restricts the ability of states to develop food package options. As an alternative, we would support either cost neutrality on a total food package basis, or cost analysis of substitutions based on the impact on average food package costs for the State Agency.

In addition, we encourage USDA to allow food options that support the WIC Program's health and nutrition messages. For example, adding whole fruits and vegetables to the food package either as a replacement for juice or as additional items, would address current nutrition recommendations and provide an opportunity to impact participant's health by making it easier for them to consume the recommended servings of fruits and vegetable.

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.

Options within the food packages should include type and variety of foods that are viewed as culturally appropriate by the populations currently served by the WIC Program. Quantities within each food group should continue to reflect the nutrient needs of each participant category. At a minimum, focus nutrients should include Folic Acid, Calcium, Iron, Fiber, Vitamin A and C, and antioxidants. Recommended quantities should be made based on future work of IOM on this topic; it is premature to speculate at this time.

The cost implication of individual food package items must be considered, however, could be offset by setting a maximum and by allowing states to work within that maximum to provide items that meet current nutrition, personal preference, and cultural needs of each states diverse needs. States should have the option to take advantage of locally produced products to help offset the increased cost for certain foods.

3. Should the quantities of foods in the current WIC food packages be adjusted? If yes, by how much and why? Please discuss cost implications.

There should be flexibility between categories and an overall not to exceed amount.

5. Keeping in mind that foods provided by WIC are designed to be supplemental, can the WIC food packages be revised (beyond what is allowed under current regulations) to have a positive effect on addressing overweight concerns? If so, how? Please be specific.

The ability to add fruits and vegetables could have a positive effect on addressing overweight. Diet quality for each category of participants could be improved with the addition of fruits and vegetables, in addition educational efforts promoting their consumption would be supported in a more tangible way.

6. Are there other concerns that affect foods issued through the WIC food packages that should be considered in designing the food packages? For example, should WIC provide options to address allergies (the American Dietetic Association notes that the most common food allergies are to milk, eggs, peanuts, soybeans, tree nuts, fish, shellfish and wheat), cultural patterns or food preferences?

All of these concerns should be considered. Allergies, cultural food patterns and food preferences affect whether or not WIC participants purchase and consume the foods that

WIC staff prescribe for them. The program's effectiveness is greatly diminished if the food package is dominated by foods that participants cannot eat or foods that they find unacceptable for whatever reasons.

7. What data and/or information (please cite sources) should the Department consider in making decisions regarding revisions to the WIC food packages, e.g., nutritional needs of the population, ethnic food consumption data, scientific studies, acculturation practices, and participant surveys, etc.?

GAO-02-657 Fruits and Vegetables, USDA/ERS Maternal Knowledge and Children's Diet Quality and Nutrient Intakes

8. Recognizing that current legislation requires WIC food packages to be prescriptive, should participants be allowed greater flexibility in choosing among authorized food items? If so, how?

Yes, within each category, participants could be prescribed food items that meet their individual needs. The prescription should include the target nutrients, and be less focused on specific food items.

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

Increase the variety of choices within each category available to meet diverse nutritional needs. Food Package III should be more flexible in order to provide foods other than strictly juice and cereal in conjunction with formula.

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

More flexibility should be afforded WIC State Agencies in designing WIC food packages in order to adapt to the fluctuating cultural needs of the States. The current food package rule has been basically unchanged for 30 years, and very few exceptions have been granted. As a result, whole sub-populations of WIC participants under-purchase the items prescribed for them, limiting the impact that the program can have on their dietary intake. The methodology for food package design and approval of substitutions must be made simpler, or we will continue to fail to meet the needs of the growing diversity in the WIC Program.

11. The WIC program's overall goal is to achieve the greatest improvement in health and development outcomes for WIC participants, achieved partly by providing food that targets nutrients determined to be lacking or consumed in excess in the diets of the WIC population. In addition to targeting these food nutrients, food selection criteria should address necessary operational concerns for the foods--for example, cost effectiveness; appeal to recipients; convenient and economical package sizes; complexity/ burden for the WIC administrative structure to manage; etc. It would be

helpful if commenters would identify/recommend WIC food selection criteria, describe how the criteria interact, indicate their relative weighting or importance, and provide supporting rationale.

It is difficult to comment on specific food selection criteria at this time. On the other hand, consideration should be given to criteria that ensure foods provided are produced in this country, from food grown in this country. Locally grown produce, as defined in the Farmers' Market Nutrition Program should be identified as preferred options in a conscious effort to support local agriculture.

Thank you for the opportunity to submit these comments. We look forward to the work of the Institute of Medicine, and the opportunity to comment on a new food package proposal. We encourage USDA to move as quickly as possible to issue a proposal, as changes in our outdated food package are long overdue.

Sincerely yours,

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