



# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

### DIVISION OF HEALTH EDUCATION, MANAGEMENT AND SURVEILLANCE WIC PROGRAM

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: Revision 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 Package. Our comments are numbered to correspond to the questions posed in the Federal Register notice of September 15, 2003.

All of the currently allowed WIC foods should be retained in the revised packages.

2. The following changes to the types of food currently authorized are recommended:
  - Juice for infants should be allowed no earlier than 6 months of age.
  - Canned legumes should be allowed in addition to dried peas and beans.
  - Fresh, frozen and canned vegetables should be added.
  - Fresh, frozen and canned fruits should be allowed in full or partial replacement of juice for women and children.
  - More vegetarian choices should be available, including calcium- and Vitamin D-fortified soy milk and rice milk to replace cow's milk and substitutions among the protein-rich foods should be allowed (e.g., additional legumes should be allowed for a person who doesn't eat eggs.)
  
3. The following adjustments to the quantities of foods in the WIC food packages are recommended:
  - A stricter limit on the maximum quantity of cheese allowed in replacement of milk should be considered to ensure that the fat content of the WIC food packages is controlled.
  - The maximum quantity of milk for women and children should be reduced to match the amounts recommended in the Food Guide Pyramid.
  - The maximum quantity of juice allowed for women and children should be reduced to match dietary requirements.
  - Multi-month averaging should be allowed to maximize the amount of formula that may be issued to participants.



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- The amount of formula allowed should be based on reconstituted ounces at the physician-prescribed dilution.
4. The 5 current target nutrients (calcium, protein, iron, Vitamin C and Vitamin A) should be retained. Folic acid, magnesium, zinc, Vitamin B6 and fiber should be added, based on the findings regarding the nutritional status of WIC participants that were published by the USDA Center for Nutrition Policy and Promotion in 1999.
  5. The following measures are recommended to address concerns regarding overweight:
    - a. The total quantity of protein-rich foods (milk, eggs and cheese), as well as juice, should be reduced.
    - b. Vegetables and fruit (in full or partial replacement of juice) should be added. The inclusion of baby fruits and vegetables to promote early exposure/acceptance of these foods should be considered (in full or partial replacement of juice.)
  6. States should be allowed to provide a substitute to replace a food to which a participant is allergic or which is culturally acceptable.
  7. Participants and staff have been asking for revisions to the food packages for several years. We understand that USDA is waiting for the Institute of Medicine study to establish the scientific basis for proposed changes. The revised EPA fish advisory guidelines should be considered in this process.
  8. Participants should continue to be required to choose among authorized food items up to the maximum amount of each prescribed, in order to ensure that the target nutrients are available in the amounts prescribed.
  9. States should be allowed to prescribe food packages that meet the cultural and ethnic needs of the communities that they serve, provided that they include the target nutrients. An expedited approval process should be implemented to ensure that states will be able to meet such needs in a timely fashion.
  10. State agencies should be given more flexibility to select from a wide variety of alternative foods based on nutrient content, regional availability, participant preferences, cultural acceptability, cost and administrative feasibility. Food-for-food substitutions should not be required as they are virtually impossible to achieve. Cost neutrality based on the overall cost of food packages should be allowed.

Again, thank you for the opportunity to comment on this important matter.

Sincerely,

Barbara Metcalf Walsh<sup>RCB</sup>

Barbara Metcalf Walsh  
State WIC Director

BMW/SJ/bks

cc: Robert Mulvey, Regional Director  
Renée Coleman-Mitchell, Division Director