

ProtectTexas™

Texas Department of Health

GSA-29

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Commissioner of Health

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Nick Curry, M.D., M.P.H.
Executive Deputy Commissioner

December 12, 2003

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

Re: Revisions to the WIC Food Packages

Dear Ms. Daniels:

Enclosed is the Texas WIC Program's response to the U.S. Department of Agriculture's request for public comments on redesigning the WIC food packages. We appreciate the opportunity to provide these comments, and encourage USDA to expedite its deliberations on this very important issue.

Obesity prevention through healthful eating and increased physical activity is a high priority for the Texas Department of Health and for the state of Texas as a whole. Throughout the state we see community-based coalitions working to improve nutrition in schools and trying to increase the number of healthy food options in restaurants and fast-food outlets. We often field questions from our health and medical organizations and from the Texas legislature about what WIC is doing to improve the selection of foods it provides to its more than 800,000 participants. There is consensus among these organizations that much can be done to improve the WIC food packages – especially through the provision of fruit and vegetables.

In addition to enclosing a list of recommendations for food package changes (Enclosure #1), we are enclosing a copy of a request we submitted to USDA in June 1999 for a waiver to modify women's and children's food packages (Enclosure #2). On August 31, 1999, USDA asked us to provide clarification of the proposal, which we viewed as a positive sign, and felt that the clarifications we provided greatly strengthened our proposal. Our request for waiver was eventually denied because at that time USDA had a proposed food-package rule in clearance and a moratorium on changes to the food package. We have enclosed the documents and correspondence between Texas and USDA related to our request for a waiver because they very clearly demonstrate that significant changes can be made to the WIC food packages without increasing costs.

Currently, WIC's standard food packages for women and children offer amounts of foods in inverse proportion to national dietary guidelines, i.e., more servings of high-fat foods (cheese, peanut butter, and milk) than complex-carbohydrate foods and vegetables. We strongly encourage USDA to make food package changes that reinforce national guidelines and that will be consistent with WIC's nutrition education messages.


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Ms. Daniels
December 12, 2003
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If you have questions about the information enclosed, please contact Barbara Keir, Director, Division of Public Health Nutrition and Education within the **Bureau of Nutrition Services**. She can be reached at 512-458-7111, extension 2144, or barbara.keir@tdh.state.tx.us.

Sincerely,


Mike Montgomery, Chief
Bureau of Nutrition Services

Enclosures

Enclosure 1
Proposed Revisions to the WIC Food Packages
Texas Department of Health
December 12, 2003

1. Allow each state the flexibility to modify food packages so they reflect the cultural diversity within their state, as long as the changes are cost neutral and as long as key nutrients are provided in amounts that do not fall below a minimum level. State-specific modifications should be reviewed and approved as a part of the state agency's yearly state plan.

2. Offer protein alternatives, such as tofu, as a substitute for beans and peanut butter.

Tofu is widely consumed by the Asian population, as well as by vegetarians and health-conscious individuals. The soy protein in tofu contains all eight essential amino acids, i.e., is a complete protein. Not only does tofu contain a comparable amount of protein as beans, but it also contains iron, folate, magnesium, zinc, and a significant amount of calcium. Soy protein is low in saturated fat and cholesterol – and both the FDA and the American Heart Association recognize the consumption of soy protein as a means to reduce cholesterol and lower the risk of heart of disease. Recent research also suggests that soy may have a role in the prevention or control of diabetes, as well as delay the development of cancer and osteoporosis.

3. Reduce the amount of juice offered to women and children, and replace with frozen and/or canned vegetables. Additionally, states should be given the flexibility of offering a combination of juice and vegetables in varying amounts so that participants have the option of choosing more vegetables than juice.

Currently, the amount of juice offered in WIC food packages provides, in most cases, more than 100% of the Dietary Reference Intake for vitamin C. We propose that the food packages offer no more than: 4 cans of juice for pregnant women, 5 cans for all breastfeeding women, and 3 cans for postpartum women and children older than one. (See Table 2) This would provide approximately 80% of the DRI for vitamin C for most categories, and more than 100% for children. Reducing the amount of juice would provide cost savings and allow for the substitution of frozen or canned vegetables.

Although fresh produce is available year round, there are significant fluctuations in price from season to season. By offering frozen or canned vegetables, we can be assured that participants get a constant amount each month at a relatively consistent price throughout the year.

In October 1999, the TDH WIC program analyzed the diets of approximately 900 randomly selected WIC participants and found that fruit juice accounted for up to 55 percent of the recommended number of servings of fruits and vegetables consumed. We believe that the high consumption of fruit juice by WIC participants results from the excessive amount provided by WIC. We strongly believe that decreasing the amount of juice and adding vegetables to the food package will have a positive impact on vegetable consumption among WIC participants. As the

food package stands today, it is in direct conflict with our educational message to limit daily juice consumption.

Please refer to Enclosure # 2 for information about the cost of vegetables, and how it would be offset by decreasing the amount of milk and juice offered.

Table 1. Recommendations for Maximum Amounts of Juice by Category

Category	Current Total oz (cans)	oz/day	vitC/ mg per day	% DRI	Proposed Total oz (cans)	oz/day	vitC/ mg per day	% DRI
Pregnant	276 (6)	8.9	95.3	136	184 (4)	5.9	63.2	90
Excl BF								
1 st 6 mos	322 (7)	10.4	111.3	117	230 (5)	7.4	79.5	84
2 nd 6 mos				124			79.5	88
BF	276 (6)	8.9	95.3	100	230 (5)	7.4	79.5	84
PP	184 (4)	5.9	63.2	105	138 (3)	4.5	47.7	79
Children								
1-3 yrs	276 (6)	8.9	95.3	212	138 (3)	4.5	47.7	119
4-6 yrs				238			47.7	106
Infants								
6-11 mos	92 (2)	2.9	31.1	89	NA	NA	NA	NA

Nutrient analysis of canned orange juice was performed on Nutritionist V, version 2.1.

4. Eliminate juice from the infant food package.

Breast-milk and infant formulas provide all essential nutrients, so juice is nutritionally unnecessary. By providing juice to infants, we send the message that juice is a necessary addition to the infant's diet, when it isn't. Despite our best educational efforts, we have WIC families that continue to give their infants juice in a bottle, and we have infants beginning the "juice habit" at a very young age. Both of these habits can lead to baby-bottle tooth decay, which is a major health concern among WIC children.

5. Reduce the amount of infant cereal offered. Offer no more than 16 ounces per month to infants from 4 to 10 months of age. Offer no more than 8 ounces per month to infants from 10 to 12 months. Delay the issuance of infant cereal to exclusively breast-fed infants until they are 6 months of age.

In fiscal year 2002 in Texas, infant cereal vouchers had an average redemption rate of 72% for 16-ounces, 68% for 24 ounces, and only 65% for 36 ounces. In addition to a low redemption rate, WIC moms have been telling clinic staff for many years that WIC issues too much infant cereal.

In August 2002, the U.S. Breastfeeding Committee published a statement expressing the opinion that healthy full-term infants be exclusively breastfed for the first full six months of life. This committee found no evidence to support the introduction of complementary foods before six months of age.

6. Add baby foods (e.g., vegetables, fruits and meats) to the infant food package starting at 6 months of age.

By eliminating juice and reducing the amount of infant cereal, we estimate a savings of about \$2.90 per month for each infant 6 months of age and older. Additional savings would also be realized by the reduction of cereal offered between 4 and 5 months of age (about \$0.20 per month) and from other modifications in the child and women's packages.

7. Reduce the amount of milk in adult and child food packages by 3 quart-equivalents per month.

With the exception of teens, the amount of milk currently offered each month exceeds 100% of the DRI for calcium (see Table 2 below). The savings from this reduction should be used, along with the savings from the reduction in juice, to offset the additional cost of vegetables.

Table 2. The calcium content of milk items.

Category	Total Amount	Calcium /day	DRI	% DRI
<u>Children</u>				
1-3 yrs	24 qt	902 mg	500 mg	180
4-6 yrs			800 mg	113
<u>Pregnant</u>				
<= 18 yrs	28 qt	1053 mg	1300	81
19-50 yrs			1000	105
<u>Breastfeeding</u>				
1st 6 mos				
<= 18 yrs	28 qt	1053 mg	1250	84
19-50 yrs			700	150
<u>Breastfeeding</u>				
2nd 6 mos				
<= 18 yrs	28 qt	1053 mg	1300	81
19-50 yrs			1000	105
<u>Non-Breastfeeding</u>				
<= 18 yrs	24 qt	902 mg	1250	84
19-50 yrs			700	150

Nutrient analysis of whole milk was performed on Nutritionist V, version 2.1.

8. Offer fortified soymilk and yogurt as “milk equivalents.”

Fortified soymilk should be offered as an alternative “milk equivalent” for participants who do not consume cow's milk because of lactose intolerance, allergy to cow's milk protein, or dietary, cultural, or religious beliefs. It contains calcium, vitamin A and vitamin D equivalent in amounts similar to milk, and also contains iron, B vitamins and high quality protein. Fortified soymilk is also low in saturated in fats and contains no cholesterol. Although lactase-treated milk is currently offered as an alternative to regular milk for participants with lactose intolerance, it is not a viable solution for those individuals who have a cow's milk allergy, or for those who avoid animal products because of cultural, dietary or religious practices.

Plain yogurt should also be available as a “milk equivalent.” Yogurt is lowfat and provides significant amounts of calcium; it also is a source of protein, folate, magnesium and zinc.

9. Reduce the fat content of the food package by offering only 2% or low-fat milk to all participants except those who are underweight, and limit the amount of cheese that can be purchased each month to no more than 2 pounds.

The WIC food packages are often criticized for offering high-fat foods, and although we realize that the fat content of WIC foods did not cause the obesity epidemic, we feel it is important to use the food package to reinforce WIC’s educational messages. The single most significant way for people to reduce their fat intake is to consume low-fat and fat-free milk products – and this should be demonstrated via the WIC food package. Also, by reducing the maximum amount of cheese that can be issued in place of milk, there will be a cost savings.

10. States should be allowed to issue ready-to-feed formula to infants who are immunocompromised and also to those that are tube-fed at home.

It is widely known that milk-based powdered formula is not a sterile product. Over the past few years, several batches of infant formula have been recalled due to the detection of unacceptable levels of the bacteria *E. sakazakii* in formula. Also, in response to several infant deaths resulting from contaminated infant formula, the FDA and CDC have recommended that in the NICU setting, commercially sterile ready-to-feed and liquid concentrate formulas should be used when available; powdered formula should be used only when alternative commercially sterile formulas are not available. Many WIC infants are immunocompromised and/or are tube-fed at home, and these infants should receive the same precautionary care at home as in the hospital when it comes to providing sterile formula.

11. Allow states the flexibility to ensure that infants and children receiving special formulas (non-contract, exempt) get the maximum amount authorized by regulations.

All powdered formulas do not reconstitute to the same number of fluid ounces (e.g., Neocate calls for 1 scoop powder to 1 ounce of water as opposed to the typical 1 scoop powder to 2 ounces of water), and as a result, some infants end up with less reconstituted formula than infants who get other types of formula. States should be allowed to issue more powdered formula when this is the situation. Also, some infants and children are shorted formula when their prescribed formulas happen to be packaged in a non-standard can size or unique packaging, e.g., when a child is prescribed Pediasure (which is sold in unbreakable six-packs) they lose 5 cans of formula to which they are entitled because most vendors will not break six-packs. States should be allowed to round up when the can size or packaging would provide less than the maximum authorized amount.

12. Develop a “transition” package for infants between 11 and 12 months of age.

By 11 months of age, infants are consuming less formula and/or breast-milk, while consuming more and more solids. Parents of infants at this age should be given the option of choosing

between an infant package or an infant “transition” package that provides foods they are typically eating at this age, e.g., reduced formula, fruit juice, toddler foods, certain adult cereals, etc. In Texas, the number of infants participating in WIC decreases with age, i.e., between 1 and 3 months of age, we have a 3.5% no-show rate, and by 11 months of age the no-show rate increases to 22%. Although we have no quantitative data to substantiate the reason for this trend, qualitative data we’ve collected through focus groups with WIC families indicate that the value of the infant formula becomes less important as the infants get older. An infant “transition” package may enhance the perceived value of participation and increase the show-rates for older infants.



Texas Department of Health

William R. Archer III, M.D.
Commissioner of Health

Patti J. Patterson, M.D., M.P.H.
Executive Deputy Commissioner

June 17, 1999

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Sondra Ralph, Regional Director
Supplemental Food Programs
USDA Food and Nutrition Service
Southwest Region
1100 West Commerce Street
Dallas, Texas 75242-9980

Dear Ms. Ralph:

The Texas Department of Health WIC Program is proposing an expanded cultural food package for women and children. The proposed food package adds vegetables and rice to WIC's existing standard food package, and slightly decreases the amount of cheese and juice offered.

Currently, WIC's standard food package offers amounts of foods in inverse proportion to national guidelines, i.e., more servings of high-fat foods (cheese, peanut butter, and milk) than complex-carbohydrate foods (cereal). The proposed food package will reinforce national dietary guidelines and will provide WIC with the opportunity to reinforce its nutrition education messages.

WIC must take a leadership role in helping to stem the rising rates of obesity and type 2 diabetes in children. By approving this modification of its standard food package, WIC will be sending a strong intervention message to its participants.

We feel that a strong case has been presented for this project. We estimate that the cost of the food package will decrease. The addition of the vegetables and rice will increase vitamin A, iron, and protein, and will provide a significant increase in folate and dietary fiber.

We appreciate your serious consideration of this proposal and look forward to discussing it in greater detail. If you have questions about this proposal, please contact Mike Montgomery, Chief, Bureau of Nutrition Services, at (512) 458-7444.

Sincerely,

William R. Archer III, M.D.
Commissioner of Health

Proposal for Cultural Food Package

The Texas Department of Health, WIC Program is requesting approval to modify its standard food package so that it will be more culturally appropriate. This food package would be provided to all women and children. The modifications include:

- decreasing the amount of juice from 276 ounces to 230 ounces,
- decreasing the amount of cheese from 2 pounds to 1 pound,
- increasing the amount of beans from 1 pound to 2 pounds,
- adding 2 pounds of frozen vegetables, and
- adding 2 pounds of rice.

A comparison of the standard and proposed food packages is presented in Table 1.

The comparison of the nutrient analysis of the existing standard food package for pregnant women, and the proposed food package is exhibited in Table 2. The proposed changes to the standard food package increases the nutrient value of all target nutrients, with the exceptions of vitamin C and calcium. The amounts of these nutrients provided in the proposed package, however, meet or exceed the current dietary recommendations for most participants.

The justification for decreasing the amount of juice offered in the current food package is based on the amount of vitamin C provided in the current standard food package. Table 3 compares the nutrient analysis of the standard and proposed food packages based on the Recommended Dietary Allowance (RDA) and the Dietary Reference Intakes (DRI) per day for individuals according to age. The current food package contains approximately 3388 mg. vitamin C, or 113 mg. per day. The proposed package will provide 3078 mg. vitamin C, or 103 mg. vitamin C per day. This amount exceeds the RDA for vitamin C for all participant categories, despite the reduction in juice.

Decreasing the amount of cheese from 2 pounds to 1 pound reduces the amount of calcium in the food package by 7.5%, and fat by 14%. The amount of calcium in the proposed food package is 32261 mg., which provides 1075 mg. per day. This amount exceeds the DRI for all categories of participants with the exception of pregnant females 18 years or younger (Table 3). A special food package will be designed for these participants that will provide the daily recommended calcium. The other proposed modifications either have an insignificant or positive effect on the nutrient composition of the food package.

The rationale for adding frozen vegetables, instead of fresh or canned, takes into consideration the following issues:

- 1) It does not complicate the grocery-store experience. Ideally, we would like to authorize the purchase of a combination of fresh, frozen, and/or canned vegetables because it would reinforce our educational messages. But allowing such a combination would present a mathematical dilemma for many participants, and thereby complicate the grocery-store experience.

- 2) It assures that participants get a consistent amount of vegetables year-round. Although fresh produce is available year-round in Texas, there are significant fluctuations in price from season to season. By offering frozen vegetables, we can be assured that participants get a constant amount at a relatively consistent price. We also will not have to manipulate the “approved vegetable list” throughout the year to accommodate season price fluctuations.
- 3) Frozen vegetables are readily available in retail stores. Smaller retail outlets don’t always carry a wide selection of fresh produce because it doesn’t have a long shelf life, but they typically carry frozen vegetables.
- 4) Frozen vegetables offer a more consistent nutrient value. Researchers at the University of Illinois, Urbana-Champaign, compared the effects of processing, storage and cooking on the nutrient content of fresh, frozen and canned vegetables. The initial processing of frozen and canned vegetables results in a small loss of nutrients. After the initial step, there is no further decline in nutrient content over the shelf life of the vegetables. In contrast, fresh vegetables steadily lose nutrients from the time of harvest until the time when the vegetable is finally prepared and consumed.

By offering only 100% vegetables or vegetable mixtures, we will ensure that participants get the most nutrient value for the money. We therefore propose that the following restrictions be placed on the types of frozen vegetables authorized for purchase.

- No creamed vegetables, no added sauces or seasonings, and no added nuts.
- No vegetable-pasta mixtures.
- No breaded vegetables (e.g., potatoes, onion rings, okra, etc.).
- No onions – except as a part of a vegetable mixture.
- No potatoes (with few exceptions they are either breaded or have added fat).

The rationale for adding rice addresses the following issues:

- 1) Rice supports many of the cultural food practices represented by the ethnic groups living in Texas. Rice offers a more culturally flexible food choice and can be incorporated into the diets of many different ethnic groups. Rice is included in the diets consumed by a broad range of ethnic groups represented in Texas. For example, Hispanics, Blacks, and Asians all include rice, in some form, in their diets. By offering rice, our food package will enhance the diets of the many different ethnic groups represented across Texas.
- 2) Rice will increase the content of complex carbohydrates and fiber in the standard food package. The addition of rice to the food package will help to bring it closer to the national guidelines increasing the number of servings of foods containing complex carbohydrates and fiber offered to our participants.

Vegetables and rice have broad appeal among all cultures in Texas. In March 1995, the Texas WIC Program conducted a study of WIC participants to determine their satisfaction with WIC foods. Open interviews were conducted with a racially-representative sample of 122 participants in Austin

and San Antonio. When asked "What foods do you wish WIC would add to the food package?" the most frequently requested category of food was fresh vegetables. According to a 1995 study conducted by the Public Health Nutrition Program at the Texas Department of Health, one of the most important reasons that low-income families don't consume adequate fruits and vegetables is that they believe they cost too much.

Results from a 1998 point-in-time phone survey, conducted by the Texas Department of Health in September 1998, indicate that only 24% of adults in Texas consumed the recommended 5 servings of fruits and vegetables each day. The addition of frozen vegetables to the food package will help to increase consumption of these foods and will reinforce the goals of the Year 2000 to increase consumption of complex carbohydrates and fiber. Nutrition education regarding these foods will also provide WIC participants with new methods to include vegetables in their diets, and reinforce the message that there are economical ways to incorporate vegetables in the diet throughout the year without exceeding the family's food budget.

The addition of vegetables and rice will reinforce national dietary guidelines which are the cornerstone of WIC's nutrition education and improve the nutrient composition of the food package. Currently, the standard WIC food packages offer amounts of foods in inverse proportion to national guidelines. The WIC food packages presently provide more servings of high-fat foods, for example cheese, peanut butter and milk, than complex carbohydrate foods, such as rice, and vegetables.

Promotion of the expanded food package. In conjunction with the addition of vegetables and rice to the standard food packages, WIC staff will provide more intense education on the inclusion of these food items in the diet. Nutrition education efforts will include: (1) food demonstrations, (2) the development of cost-effective recipes that are appealing to children and adults across all cultural groups, and (3) the development of lessons on the nutrition and health benefits provided by these foods.

Evaluation. In order to evaluate the success of the expanded food packages, we propose the following evaluation strategies. We would welcome an in-depth discussion of the evaluation component with staff of USDA to assure a complete and valid evaluation of this proposal.

- 1) Tracking redemption rates of new food items. This will help us determine the percent of participants who are actually selecting these food items. (When we implement EBT, we will be able to determine the exact food items which are selected.)
- 2) Customer satisfaction. A survey will be developed to compare participant satisfaction before and during the pilot study.
- 3) Farmers Market Program redemption rates. A comparison of the Farmers Market Program (FMP) redemption rates from the year prior to the implementation of the pilot study will help determine the impact of the inclusion of frozen vegetables and rice in the food package on this program. Currently, WIC participants in only 34 of the 254 counties of the state benefit from the FMP. Redemption rates of FMP coupons during FY98 were 56%. We want to assure that the convenience of redeeming vouchers for frozen vegetables at a grocery store,

at the same time a participant purchases other WIC foods, does not negatively impact participation in the FMP. In fact, we hope that the emphasis on vegetable preparation as a part of nutrition education will help to increase participation in the FMP.

- 4) Vendor satisfaction. A survey of vendors both before and after implementation will enable us to determine vendors' attitudes and satisfaction with the addition of frozen vegetables and rice. We want to make sure it does not complicate the grocery store experience for either the participant or grocer.
- 5) Participation. The tracking of participation will help to determine if the addition of frozen vegetables and rice to the food package influences the number of participants in the WIC program (e.g., does it attract new participants, and/or encourage current participants to continue to participate?).

No additional cost to the program. We estimate that the cost for each participant receiving frozen vegetables and rice to be approximately \$36.89, compared to the estimated cost of the current standard food package of \$37.48 (this is based on Texas WIC food costs from March 1999). This amount reflects a saving of approximately \$0.58 per woman and child based on the following average food costs:

- beans \$0.55/lb.
- cereal \$.146/oz.
- cheese \$3.29/lb.
- eggs \$0.98/dz.
- evaporated milk \$0.66/12 oz.
- juice \$1.33/can
- milk \$1.38/½ gal.
- vegetables \$2.00/2 lb. (average shelf cost)
- rice \$1.50/2 lbs. (average shelf cost)

The total annual cost of the proposed food package is \$19,459,475.00, compared to \$19,770,700.00, and reflects a cost savings of \$311,225.00 (based on March 1999 Texas WIC participation of 350,000 children, 74,800 pregnant women, 39,800 breast-feeding women, and 62,900 postpartum women = 527,500).

Table 1. Comparison of Standard and Proposed Food Package Items

	<u>Standard</u>	<u>Proposed</u>
Reduced Fat Milk, 2%	4.5 gallons	4.5 gallons
Whole Evaporated Milk	1.5 quarts	1.5 quarts
Cheese	2 pounds	1 pound
Juice	6 cans (276 fl. oz.)	5 cans (230 fl. oz.)
Eggs	2 dozen	2 dozen
Cereal	36 ounces	36 ounces
Beans	1 pound	2 pounds
Rice	-	2 pounds
Vegetables, frozen	-	2 pounds

Table 2. Nutrient Analysis of Standard and Proposed Food Packages

	<u>Standard</u>	<u>Proposed</u>	<u>% change</u>
Kcal	24959	27857	+ 11.6
Protein, gm	1309	1372	+ 4.8
Fat, gm	945	812	- 14.1
Dietary Fiber, gm	230	385	+ 67.2
Vit A (RE)	19991	21834	+ 9.2
Vit C, mg	3388	3078	- 9.1
Calcium, mg	34891	32261	- 7.5
Iron, mg	369	437	+ 18.4
Folate, µg	8996	13474	+ 49.8

Table 3. Comparison of the Standard and Proposed Food Packages Nutrient Analysis Per Day (RDA/DRI)

	<u>RDA/DRI*</u> Pregnant Lactating, 1-6 mos. Lactating, 7-12 mos. Children, 1-3 yrs. Children, 4-6 yrs.	<u>Standard Food Package</u>	<u>Proposed Food Package</u>
kcal	2500 2700 2700 1300 1800	831.9	928.58
Protein, gm	60 65 62 16 24	43.6	45.7
Fat, gm (30% of total kcal)	83 90 90 43 60	31.5	27.1
Dietary Fiber, gm	20-35	7.7	12.8
Vit A (RE)	800 1300 1200 400 500	666.4	727.8
Vit C, mg	70 95 90 40 45	112.9	102.6
Calcium*, mg	1000, 1300 (\leq 18 yrs.) 1000 1000 500 800	1163.0	1075.4

Table 3. Comparison of the Standard and Proposed Food Packages Nutrient Analysis Per Day (RDA/DRI)

	<u>RDA/DRI*</u> Pregnant Lactating, 1-6 mos. Lactating, 7-12 mos. Children, 1-3 yrs. Children, 4-6 yrs.	<u>Standard Food Package</u>	<u>Proposed Food Package</u>
Iron, mg	30 15 15 10 10	12.3	14.6
Folate, µg	600 500 500 150 200	299.9	449.1



FAX TRANSMITTAL # of pages **7**

To Mike M.	From Susan Mayer
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Fax #	Fax #

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William R. Archer III, M.D., Commissioner
 Texas Department of Health
 1100 West 49th Street
 Austin, TX 78756-3199

Dear Dr. Archer:

We are writing to you to follow up on your request to issue an expanded cultural food package for women and children in the Supplemental Nutrition Program for Women, Infants and Children (WIC). We have reviewed this proposal and discussed it with our National office. Together we have noted some weaknesses in the proposal. Enclosed are our comments and recommendations. To further assist you in the refinement of this proposal, we are providing you with a checklist that has been developed by our National Office. As this is the first proposal that the Food and Nutrition Service has received of this nature, we want to assure that the proposed rationales and supporting data are as complete as possible.

Upon receipt of the revised proposal, we will complete a final review and forward it on to our National office with our recommendations. They, in turn, will make a final determination to approve or disapprove.

Thank you for your cooperation. If you would like to discuss this matter further, you may contact Sondra Ralph, Regional Director for Supplemental Food Programs, at 214-290-9812. In addition, her staff is available to lend whatever technical assistance your WIC staff might need in revising this proposal.

Sincerely,

151

RUTHIE JACKSON
 Regional Administrator

Enclosure

WIC - Supplemental Cultural Foods - 2nd response

File (SF)WC _____ State Policy -TX
 Cross file: (SF)WC 22-2 SA FOOD LISTS -TX

Enclosure 1

Texas Cultural Food Package Proposal
FNS Recommendations

- FNS requires a definition of the new food items in terms of allowable forms, quantities, package sizes, nutrient content ranges, and serving sizes. This information should be specified in the nutrient and cost analyses. 26-108
- Please state which vegetables will be allowed in the package. One of the issues being raised regarding selection criteria for proposed additions to the WIC food package is that foods should, at a minimum, meet 10% of the Daily Value (D.V.) per serving for one or more of the WIC target nutrients. Some vegetables (e.g., corn) do not meet 10% of the D.V. for any of the WIC target nutrients.
- Much of the rationale for including frozen vegetables in your proposal can also be applied to canned vegetables. Please explain reasons for not including canned vegetables and provide more detail on how their inclusion would complicate the grocery store experience.
- The proposal states that the addition of rice in the food package will enhance the diets of the many different ethnic groups represented across Texas. Please describe food consumption levels of rice and other grains in Texas and compare these to the U.S. Dietary Guidelines, list the nutrient profile of the type of rice that is being proposed, and the contribution rice makes to the intake of WIC target nutrients. A

Implementation and issuance:

- The proposal does not indicate if the State agency intends to introduce this new food package as a "pilot" or if implementation will be statewide. Please clarify how this food package will be introduced.

The proposal indicates that a special food package for pregnant teens is being developed as the proposed food package does not meet the nutritional needs of this sub-group of pregnant women. However, there is no additional information included in the proposal that indicates what this particular food package will include. Please provide further details on this food package. *teens*

Please describe how this proposal will affect the food delivery system, including any modifications to your management information system (MIS) and related costs. Please include sample food packages or instruments. In addition the proposal should describe the SAs plan for training staff, vendors and participants.

FOOD SUBSTITUTIONS TO ACCOMMODATE CULTURAL EATING PATTERNS

PROPOSAL CRITERIA

A) Statement of Need

- 1) Provide a clear statement of need for the proposed food package change(s) from participants' standpoint, or based on market research, such as participant preference/acceptance surveys.
- 2) Document good faith efforts to encourage acceptance of current food packages by offering forms, brands or types that might accommodate food preferences, and by providing culturally sensitive nutrition education.
- 3) Demonstrate why/how the proposed changes are nutritionally appropriate for the groups being accommodated by providing information on their preferences and nutritional needs, such as data on nutritional intake.
- 4) Document that changes are sought for:
 - _____ a) clear participant nutritional and/or preference; not for cost economies or to provide foods routinely purchased and consumed by the participants being accommodated; and
 - _____ b) participant acceptance, reduction of waste or improvement of intake of target nutrients.

B) Nutritional Contribution of Alternative Foods

- 1) Describe by food package, the foods being proposed and indicate which foods they are to replace. Provide a precise definition of substitute foods in terms of allowable forms, quantities, package sizes, and nutrient content ranges, including the role of the Food and Drug Administration's Standard of Identities when they exist and are applicable to the substitute foods.
- 2) Discuss how alternative foods meet or exceed nutritional values of the foods they are to replace:

___ c) Vendors

impact of alternative foods on vendor practices, including notification and training on the new foods that will be authorized, price controls, etc. availability of the alternative foods

E) **Nutrition Education**

Describe plans for nutrition education for participants regarding alternative foods.

F) **On-going Assessment**

Describe State agency plans to periodically assess if there is a continued need for the alternative foods, and whether the alternative package remains economical and administratively feasible over time.



Texas Department of Health

William R. Archer III, M.D.
Commissioner of Health

Patti J. Patterson, M.D., M.P.H.
Executive Deputy Commissioner

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December 7, 1999

Sondra Ralph, Regional Director
Supplemental Food Programs
USDA Food and Nutrition Service
Southwest Region
1100 West Commerce Street
Dallas, Texas 75242-9980

Dear Ms. Ralph:

Enclosed please find the original alternate food package proposal from the Texas Department of Health (TDH) WIC Program as well as TDH's response to USDA-FNS's recommendations. We appreciate the critical evaluation and constructive feedback, and feel that this clarification helps strengthen our proposal.

We are pleased at the prospect of providing WIC participants with a food package that provides a reduced amount of fat and increases the amount of folate, fiber, vitamin A, and other key nutrients. The proposed package is not only nutritionally superior to our current standard food package, it actually saves the program money. This package will reinforce our nutrition education messages concerning good eating practices and the national dietary guidelines.

We appreciate your consideration of this proposal and look forward to hearing from you. If you have questions about this proposal, please contact Gerry Cannaday, Acting Chief, Bureau of Nutrition Services, at (512) 458-7444.

Sincerely,

William R. Archer III, M.D.
Commissioner of Health

Enclosures

TDH's Response to USDA-FNS's Recommendations on the Texas Cultural Food Package Proposal

***USDA's Recommendation:** Overall, the nutrition rationale appears to be sound for the goals presented. However, since these food package modifications are being proposed as a "cultural food package," the proposal should specify which cultural subgroups of WIC participants are being targeted to receive this alternative food package.*

TDH's Response: The absence of vegetables and the low consumption of cereal and grains in the diets of Texas WIC participants is a cultural issue dictated by socio-economic circumstances rather than racial/ethnic background. That is the rationale for targeting all participants regardless of racial/ethnic status. When offering this alternative food package, participants will be encouraged to accept this package if their diet recalls indicate low consumption of fruits and vegetables or cereals and grains, however, it will be available to all participants if requested.

In October of 1999, the TDH staff analyzed the diet recalls of approximately 900 randomly selected WIC participants. The results of this analysis are described in Table 1. More than 80% of both women and children across all racial/ethnic groups consumed less than 5 of the recommended fruits and vegetable servings per day. Among black, Hispanic and white women and children, 60% to 80% did not consume the recommended servings of cereal and grains. Inadequate consumption of cereal and grains by Asian women and children was 47% and 46%, respectively.

***USDA's Recommendation:** The current WIC food Packages offers many types, brands, forms, and varieties of cereal, juice, milk, cheese, dried beans and peas, and peanut butter that, in most instances are sufficiently flexible to accommodate a wide range of participant preference. Examples of the more nutrient dense alternatives are low or non-fat milk, dried beans or peas, and vitamin-fortified cereals. Therefore, this proposal should clearly demonstrate how the modified food packages provide for the nutritional needs of a specified cultural sub-group that cannot be obtained with the mix of foods currently available in the WIC food package.*

TDH's Response: Based upon the diet analysis mentioned in the previous Recommendation/Response, fruit juice accounted for up to 55 percent of the total servings of fruit and vegetables consumed. The high consumption of fruit juice may be related to the fact that WIC offers fruit juice. We see this factor as a positive influence of WIC, and believe that the inclusion of vegetables in the food package will also have a similar positive impact on vegetable consumption.

The proposed food packages will significantly increase several key nutrients available to WIC participants, in particular folate, dietary fiber, vitamin A, and magnesium. These are the key nutrients that are typically deficient when there is inadequate consumption of fruits and vegetables, and cereals and grains.

USDA's Recommendation: In addition, the proposal should provide the demographic data that supports the state agency's need to sub-categorize the participant's by culture.

TDH's Response: Demographic data to support this proposal are presented in Table 2. The demographic makeup of the Texas WIC Program in 1999 more closely reflects the economic makeup rather than the racial/ethnic makeup of Texas. According to projections based on population data from the Texas State Data Center and the 1995 economic census, approximately 20% of Texans are living in households with combined incomes at or below poverty, and almost 40% have annual incomes of less than 185% of the federal poverty level.

USDA's Recommendation: Please remember that WIC was established by Congress to specifically serve as a "supplemental" food assistance and nutrition program. The food packages are not intended to provide a complete diet but are designed to provide specific nutrients critical to growth and development, i.e., iron, vitamins A and C, high quality protein, and calcium. A variety of other nutritious foods are needed to meet all the nutrient and energy requirements of participants. Please take into consideration the fact that the Food Stamp Program provides WIC participants with resources to purchase popular yet inexpensive staple food items such as bread and rice.

TDH's Response: In August 1999 less than 20% of Texas WIC participants reported participating in the Food Stamp Program. This data does not reflect the percentage of families in WIC participating in the Food Stamp Program, but instead reports individual participation. As a result, this data is skewed by the overlap within the families enrolled in WIC participating in the Food Stamp Program. We estimate over 80% of our participants do not receive the benefits of food stamps.

USDA's Recommendation: Please provide a nutrient analysis that indicates which food products were utilized for the comparison data. The data provided does not specify what brands/types of food were analyzed (e.g., Cheerios, Total or Bran Flakes). In addition, the food composition data bank or software that was used to develop the nutrient analysis should be indicated. FNS requests that state agencies use a common nutrient data bank to analyze foods. The Agriculture Research Service's Nutrient Data Laboratory is available on the Internet and is user friendly.

TDH's Response: Nutrient analyses were performed on Nutritionist V, version 2.1, and USDA, Agriculture Research Service, 1999, Nutrient Database for Standard Reference, Release 13 (www.nal.usda.gov/fnic/foodcomp/). All food items in the current and proposed food packages have been re-analyzed with the latest version of this software. A comparison of each package's nutrient composition is presented in Table 3. The following types and brands of foods were analyzed:

- | | | |
|------------------------------------|---|--------------------------------|
| 2% reduced-fat milk | • | General Mills Cheerios |
| Canned whole evaporated milk | • | Pinto beans, dried |
| Kraft Natural Cheddar Cheese, mild | • | White, medium grain rice |
| Canned, orange juice | • | Table 4 lists all the proposed |
| Eggs, raw | | vegetables and forms analyzed. |

USDA's Recommendation: *As in the nutrient analysis, the cost analysis should also specify which types of brands and brands of foods were utilized for the analysis.*

TDH's Response: We estimate the cost for each participant receiving vegetables and rice to be approximately \$35.81 per month for all pregnant and breastfeeding women, excluding teens, \$31.84 for postpartum women, and \$33.17 for children. The estimated cost of the proposed food package for pregnant and lactating teens is \$39.06. These estimated costs are compared to \$36.34 for all pregnant and breastfeeding women, including teens, \$31.04 for postpartum women, and \$33.70 for children. These estimated costs are based on the latest food cost data available, August 1999, and reflect the following average food costs:

beans	\$0.55 per pound
cereal	\$1.80 per 12 ounces
cheese	\$3.35 per pound
eggs	\$0.92 per dozen
evaporated milk	\$0.66 per 12 ounces
juice	\$1.33 per can
milk	\$1.27 per half gallon
vegetables	\$2.00 (average maximum shelf cost, Table 4)
rice	\$1.50 (average maximum shelf cost, Table 4)

The total cost per month of the proposed expanded food package is \$18,258,052.00, compared to current standard food package estimated at \$18,414,161.00. This reflects a savings of \$156,109.00, and is based on October 1999 Texas WIC participation of 359,000 children and 182,000 women (includes 15,160 pregnant and lactating teens). Please note, these estimates reflect cost if all women and children enrolled in WIC choose to receive the proposed expanded food packages. Refer to Table 5 for a breakdown of each food package cost, current and proposed.

USDA's Recommendation: *FNS requires a definition of the new food items in terms of allowable forms, quantities, package sizes, nutrient content ranges, and serving sizes. This information should be specific in the nutrient and cost analysis.*

TDH's Response:

Vegetables Quantity - either two 16-ounce bags frozen or two 14 to 16-ounce cans (or a combination of one bag of frozen and one can).

The following forms of vegetables will not be allowed:

- creamed vegetables, e.g., creamed corn
- added sauces, seasonings or nuts
- vegetable-pasta/rice mixtures
- breaded vegetables, e.g., potatoes, onion rings, okra, etc.
- onions, except as a part of a vegetable mixture

- Rice** Quantity - two pounds of plain, uncooked, white or brown rice in either a bag or box. The following forms of rice will not be allowed:
- rice mixtures, e.g., rice and pasta or rice and beans
 - seasoned rice mixtures

The specific types of vegetables and rice being proposed are listed in Table 6, along with the nutrient analysis of each food item per serving. The analysis of food costs (Table 4) identifies the specific size of package and brand of foods which were analyzed.

USDA's Recommendation: *Please state which vegetables will be allowed in the package. One of the issues being raised regarding selection criteria for proposed additions to the WIC food package is that food should, at a minimum, meet 10% of the Daily Value (DV) per serving for one or more of the WIC target nutrients. Some vegetables (e.g., corn) do not meet 10% for any of the target nutrients.*

TDH's Response: The vegetables which will be allowed in the proposed food package are listed in Table 6. A nutrient analysis of each proposed food item is presented and compared to 10% of the DV per serving for one or more of the WIC target nutrients. Frozen corn has been excluded from the list, however canned corn has been added because it does provide 10% of the DV for vitamin C according to the Nutritionist V software used for this analysis.

USDA's Recommendation: *Much of the rationale for including frozen vegetables in your proposal can also be applied to canned vegetables. Please explain reasons for not including canned vegetables and provide more detail on how their inclusion would complicate the grocery store experience.*

TDH's Response: The TDH WIC Program has reconsidered its decision to not allow canned vegetables, and has included them in this response. This decision is based upon a survey of Texas WIC participants' preferences conducted in November 1999. Participants indicated that for some types of vegetables, e.g., green peas, spinach, and lima beans, they preferred canned over frozen. By offering canned vegetables, participants will also be able to select tomatoes. Once the pilot study is complete we will reevaluate the success of including canned vegetables. There is an enormous number of types and sizes of canned vegetables available, and for many of the WIC participants with limited reading skills, this may present a problem in the grocery store. It will not be possible to picture all the different brands of canned and frozen vegetables on our authorized food brochure, so the participants will have to be well educated on how to make the correct selections. Additionally, we may need to consider requiring vendors to label their authorized vegetables.

USDA's Recommendation: *The proposal states that the addition of rice in the food package will enhance the diets of the many different ethnic groups represented across Texas. Please describe food consumption levels of rice and other grains, and compare these to the US Dietary Guidelines, list the nutrient profile of the type of rice being proposed, and the contribution it makes to the intake*

of WIC target nutrients.

TDH's Response: As indicated in Table 1, the majority of women and children in Texas WIC do not consume the minimum recommended number of servings (6 per day) of cereal and grains. One serving of rice (100 g) provides 58 μ g of folate, whereas one 6-ounce serving of orange juice, which is considered to be one of the richest sources of folate, only provides 34 μ g. By adding rice and vegetables to the food package, we will be providing an average of 445 μ g of folate per day, as opposed to an average of 299 μ g of folate in the current package. The contribution of folate to the food package through the addition of rice and vegetables would mean that all women in Texas WIC would have access to the nationally-recommended amount of folate each day.

USDA's Recommendation: *The proposal does not indicate if the state agency intends to introduce this new food package as a "pilot" or if implementation will be statewide.*

TDH's Response: The Texas WIC Program would like to conduct a one-year, statewide pilot study of an expanded standard food package for pregnant, breast-feeding and postpartum women, and children. It will be targeted to those participants who do not consume the recommended number of servings of fruits/vegetables and cereals/grains according to participants' diet recalls.

Based on the high mobility of our clients, vendor issues, and programing complications, we cannot limit the availability of our proposed expanded food package to a particular area of Texas.

USDA's Recommendation: *The proposal indicates that a special food package for pregnant teens is being developed as the proposed food package does not meet the nutritional needs of the sub-group of pregnant women. However, there is no additional information included in the proposal that indicates what this particular food package will include.*

TDH's Response: Our original proposal discussed the possibility of developing a food package for pregnant teens because the proposed expanded food package did not provide the Dietary Reference Intake (DRI) for calcium for this sub-group. We propose a food package for pregnant and lactating teens that provides the maximum amount of milk and cheese allowed by the federal regulations. Refer to Table 7 for the proposed food packages which have been revised for pregnant and lactating teens. Please note, however, that the current food package authorized by regulations does not meet the DRI for calcium for this sub-group. A comparison of the nutrient analysis per day (RDA/DRI) of the standard and proposed food packages is detailed in Table 8.

USDA's Recommendation: *Please describe how this proposal will affect the food delivery system, including any modifications to your MIS and related costs. Please include sample food packages or instruments. In addition, the proposal should describe the SA's plan for training staff, vendors, and participants.*

TDH's Response: The modifications to the Texas WIN MIS are minimal in that no coding changes

are required. Adding, creating, or modifying food packages is considered part of the normal daily workload, and will therefore present no additional costs to implement.

Training Plans: Training of vendors and local agency staff will be provided via video teleconferencing throughout the state in the quarter prior to implementation. This will be conducted by the WIC Training Section within the Bureau of Nutrition Services (BNS). Lessons and materials to educate participants will be developed by the Nutrition Education Section within BNS.

USDA's Recommendation: *While the SA must indicate what cultural sub-groups this alternative food package is designed for, the SA must also indicate how they are going to make known the availability of these additional options to all WIC participants. Denial of alternative benefits to any participant could pose civil rights concerns. Therefore, alternative food packages designed to meet the nutritional needs of specified cultural sub-groups cannot be restricted.*

TDH's Response: Because the Texas WIC Program is not targeting a specific cultural sub-group, but a cultural group dictated by their low socio-economic status, no one will be denied the benefits of this proposed expanded food package. We plan to make known the availability of the new food packages through nutrition education classes and counseling. All participants found to consume inadequate fruits/vegetables and cereals/grains, through diet recalls, will be offered the opportunity to receive this food package.

USDA's Recommendation: *Please provide additional details regarding: the target audience; the scope; and content; for the nutrition education mentioned in this proposal.*

TDH's Response: Texas WIC currently has an extensive array of culturally appropriate nutrition education lessons focusing on the food guide pyramid and fruits and vegetables, including classes for children. These lessons are available in both English and Spanish. Prior to implementation of the proposed expanded food packages, the Nutrition Education staff will conduct an assessment of the Texas WIC participants' knowledge of purchasing and preparation of vegetables. As discussed in the original proposal, nutrition education efforts will include: (1) food demonstrations using the proposed vegetables and rice, (2) the development of cost-effective recipes that are appealing to children and adults across all racial/ethnic groups, and (3) the development of additional lessons on the nutrition and health benefits provided by these foods. These developmental efforts will be based upon the results of this knowledge assessment.

USDA's Recommendation: *In addition to the issues that you have outlined, you should also plan to assess whether or not there is a continued need for the alternative food package and if the alternative continues to be economically and administratively feasible.*

TDH's Response: Texas WIC will most certainly include these items in its evaluation, and welcomes a collaborative effort with FNS in the development of the evaluation plan.

Table 1. Percent of WIC Participants Not Consuming the Recommended Daily Servings from the Cereal-Grain and Fruit-Vegetable Groups by Racial/Ethnic Background.

Racial/Ethnic Background	Percent consuming less than 6 servings from the cereal and grain group		Percent consuming less than 5 servings from the fruit and vegetable group	
	Women	Children	Women	Children
Black	69%	74%	85%	93%
Hispanic	61%	80%	88%	93%
White	74%	60%	87%	91%
Asian	47%	46%	81%	94%

Table 2. Comparison of Racial/Ethnic Makeup of Texas Population and WIC Enrollment - 1999

	Texas Population	WIC Enrollment - Sep 1999	≤ 100% Federal Poverty Level	≤ 185% Federal Poverty Level
White	55.2 %	19.6 %	26.4 %	32.8 %
Black	11.4 %	13.8 %	18.6 %	16.1 %
Hispanic	30.4 %	65.3 %	52.6 %	48.6 %
Other*	3.0 %	1.3 %	2.4 %	2.5 %

Source: Population - Texas A&M University, Texas State Data Center, 1999 Projections
WIC Enrollment - TDH, Bureau of Nutrition Services, Texas WIN, Certification Tables
Poverty - U.S. Bureau of the Census, STF4, 1995

* "Other" consists of Asian/Pacific Islander and Native American/Alaskan

Table 3. Nutrient Analysis of Standard and Proposed Food Packages

	<u>Standard</u>	<u>Proposed</u>	<u>% Change</u>	<u>Proposed Teen</u>	<u>% Change</u>
Kcal	24755.57	27327.11	+ 10.39	29087.11	+ 17.50
Protein, gm	1299.01	1354.44	+ 4.27	1466.44	+ 12.89
Fat, gm	933.63	799.73	- 14.34	943.73	+ 1.08
Dietary Fiber, gm	299.92	376.16	+ 25.42	376.16	+ 25.42
Vit A (RE)	19908.88	22454.35	+ 12.79	3205.35	+ 17.61
Vit C, mg	3384.84	2831.87	- 16.34	2831.87	- 16.34
Calcium, mg	34496.55	32209.17	- 6.63	35409.17	+ 2.65
Iron, mg	368.68	435.00	+ 17.99	435.00	+ 17.99
Folate, µg	8983.81	13349.26	+ 48.59	13430.70	+ 49.50
Zinc, mg	266.13	276.10	+ 3.75	290.50	+ 9.16
B₆, mg	37.19	39.26	+ 5.57	39.61	+ 6.51
Magnesium, mg	5605.56	6646.26	+ 18.57	6646.26	+ 18.57

Nutrient analysis was performed on Nutritionist V, version 2.1, and USDA, Agriculture Research Service, 1999, Nutrient Database for Standard Reference, Release 13 (www.nal.usda.gov/fnic/foodcomp/).

Table 4. Food Detail Cost Analysis

<u>Vegetable</u>	<u>Frozen National Brand:</u> Green Giant, McKensie's, Birds Eye \$0.00 range /16 oz (\bar{x} average)	<u>Frozen Store Brand:</u> Hy-Top, HEB, Randalls, Albertsons \$0.00 range /16 oz (\bar{x} average)	<u>Canned National Brand:</u> Del Monte, Hunt's, Green Giant \$0.00 range /14.5 - 15 oz (\bar{x} average)	<u>Canned Store Brand:</u> Hy-Top, Fiesta, HEB, Randalls, Albertsons \$0.00 range /14.5 - 15 oz (\bar{x} average)
Broccoli	\$ 1.26 - 2.00 (\bar{x} 1.59)	\$ 0.88 - 1.49 (\bar{x} 1.07)		
Brussels sprouts	\$ 1.25 (\bar{x} 1.25)	\$ 1.18 - 1.69 (\bar{x} 1.20)		
Carrots, sliced	\$ 1.18 - 2.00 (\bar{x} 1.72)	\$0.78 - 1.49 (\bar{x} 1.14)	\$ 0.44 - 0.79 (\bar{x} 0.59)	\$ 0.39 - 0.59 (\bar{x} 0.46)
Cauliflower	\$1.59 (\bar{x} 1.59)	\$ 1.18 - 1.59 (\bar{x} 1.34)		
Corn			\$ 0.50 - 0.79 (\bar{x} 0.59)	\$ 0.33 - 0.59 (\bar{x} 0.42)
Green peas	\$ 0.93 - 2.00 (\bar{x} 1.54)	\$ 0.78 - 1.59 (\bar{x} 1.00)	\$ 0.50 - 0.79 (\bar{x} 0.62)	\$ 0.39 - 0.50 (\bar{x} 0.43)
Lima beans	\$ 1.48 - 1.49 (\bar{x} 1.49)	\$ 1.10 - 1.49 (\bar{x} 1.33)	\$ 0.47 - 0.99 (\bar{x} 0.88)	\$ 0.76 (\bar{x} 0.76)
Mixed vegetables	\$ 1.03 - 1.87 (\bar{x} 1.37)	\$ 0.78 - 1.29 (\bar{x} 0.98)	\$ 0.50 - 0.79 (\bar{x} 0.63)	\$ 0.39 - 0.59 (\bar{x} 0.48)
Mustard greens	\$ 1.18 (\bar{x} 1.18)	\$ 0.98 - 1.19 (\bar{x} 1.06)		
Okra	\$ 1.28 (\bar{x} 1.28)	\$ 1.08 - 1.39 (\bar{x} 1.24)		
Spinach	\$ 1.45 - 1.79 (\bar{x} 1.55)	\$ 0.98 - 1.49 (\bar{x} 1.20)	\$ 0.50 - 0.79 (\bar{x} 0.64)	\$ 0.44 - 0.55 (\bar{x} 0.48)
Squash, summer crookneck and straightneck	\$ 1.08 (\bar{x} 1.08)	\$ 0.98 - 1.39 (\bar{x} 1.13)		
Squash, butternut	not available	not available		
Tomatoes			\$ 0.69 - 0.99 (\bar{x} 0.85)	\$ 0.44 - 0.60 (\bar{x} 0.53)
Turnip greens	\$ 1.18 (\bar{x} 1.18)	\$ 0.98 - 1.29 (\bar{x} 1.10)		
Rice - Adolphus, Hill Country, Mahatma, Riceland, Comet, Food Club. \$ per 2 pounds.				\$0.65 - 1.50 (\bar{x} 1.11)

Table 5. Food Package Cost Detail

Food Items	Standard - Pregnant/ Breastfeeding	Standard - Postpartum	Standard - Children	Proposed - Pregnant/ Breastfeeding	Proposed - Postpartum	Proposed - Pregnant/ Breastfeeding Teens	Proposed - Children
Beans (\$0.55/lb.)	0.55	0.55	0.55	1.10	1.10	1.10	1.10
Cereal (\$1.80/12 ou.)	5.40	5.40	5.40	5.40	5.40	5.40	5.40
Cheese (\$3.25/lb.)	6.50	6.50	6.50	3.25	3.25	6.50	3.25
Eggs (\$0.92/dz.)	1.84	1.84	1.84	1.84	1.84	1.84	1.84
Evap. Milk (\$0.66/12 ou.)	2.64	0.00	0.00	2.64	0.00	2.64	0.00
Juice (\$1.33/can)	7.98	5.32	7.98	6.65	5.32	6.65	6.65
Milk (\$1.27/5 gal.)	11.43	11.43	11.43	11.43	11.43	11.43	11.43
Vegetables (\$1.00/lb.)	0.00	0.00	0.00	2.00	2.00	2.00	2.00
Rice (\$0.75/lb.)	0.00	0.00	0.00	1.50	1.50	1.50	1.50
Total Cost/ Food Package	36.34	31.04	33.70	35.81	31.84	39.06	33.17
Total Cost	4,570,481.80	1,745,379.20	12,098,300	3,888,607.90	1,790,363.20	671,050.80	11,908,030.00
Total Food Package Costs/ Current	\$18,414,161.00			Total Food Package Costs/ Proposed			\$18,258,052.00

Based on October 1999 Participation:

125,770 Pregnant and Breastfeeding women (includes 17,180 pregnant and breastfeeding Teens)

56,230 Postpartum women

359,000 Children

Table 6. Nutrient Analysis of Proposed Vegetables and Rice. Percent of the Daily Value per Serving for Proposed Enhanced Food Package.

10 % of Daily Value	kcal	protein g	fat, g	vit A, 500 IU	vit C, 6 mg	calcium, 100 mg	iron, 1.8 mg	folic acid, 40µg	zinc, 1.5 mg	dietary fiber, 2.5 g	B ₆ , 0.20 mg	magnesium, 40 mg
Broccoli, frozen	25.76	2.85	0.11	1740.60	36.89	46.92	0.56	51.88	0.28	2.76	0.12	18.40
Brussels sprouts, frozen	32.55	2.82	0.30	456.50	35.42	18.60	0.57	78.43	0.28	3.18	0.22	18.60
Carrots, frozen	26.28	0.87	0.08	12922.46	2.04	20.44	0.34	7.88	0.18	2.56	0.09	7.30
Carrots, canned	18.25	0.47	0.14	10055.02	1.97	18.25	0.47	6.72	0.19	1.10	0.08	5.84
Cauliflower, frozen	17.10	1.45	0.20	19.80	28.17	15.30	0.37	36.90	0.12	2.43	0.08	8.10
Sweet corn, canned	66.42	2.15	0.82	127.90	6.97	4.10	0.71	39.85	0.32	1.64	0.04	16.40
Green peas, frozen	62.40	4.12	0.22	534.40	7.92	19.20	1.26	46.88	0.75	4.40	0.09	23.20
Green peas, canned	58.65	3.76	0.30	652.80	8.16	17.00	0.81	37.66	0.60	3.49	0.05	14.45
Lima beans, frozen	85.00	5.16	0.29	161.50	10.88	18.70	1.16	18.02	0.37	4.93	0.10	28.90
Lima beans, canned	88.04	5.05	0.36	186.00	9.05	34.72	2.00	19.84	0.79	4.46	0.08	42.16
Mixed vegetables, frozen	53.69	2.60	0.14	3892.07	2.91	22.75	0.75	17.29	0.45	4.00	0.07	20.00
Mixed vegetables, canned	38.31	2.11	0.20	9492.31	4.08	22.00	0.86	19.23	0.33	2.45	0.06	13.04

10 % of Daily Value	kcal	protein g	fat, g	vit A, 500 IU	vit C, 6 mg	calcium, 100 mg	iron, 1.8 mg	folic acid, 40µg	zinc, 1.5 mg	dietary fiber, 2.5 g	B ₆ , 0.20 mg	magnesium, 40 mg
Mustard greens, frozen	14.25	1.70	0.19	335.25	10.35	75.75	0.84	52.13	0.15	2.10	0.08	9.75
Okra*, frozen	28.00	2.08	0.30	514.00	12.20	96.00	0.67	145.60	0.62	2.80	0.05	51.00
Spinach, frozen	26.60	2.98	0.20	7394.80	11.69	138.70	1.45	102.13	0.67	2.85	0.14	65.55
Spinach, canned	24.61	3.01	0.54	9390.46	15.30	135.89	2.46	104.65	0.49	2.57	0.11	81.32
Squash*, crookneck, frozen	25.00	1.28	0.20	195.00	6.80	20.00	0.52	12.70	0.34	1.40	0.10	27.00
Squash*, winter, butternut, frozen	39.00	1.20	0.07	3339.00	3.50	19.00	0.58	16.40	0.12	0.00	0.07	9.00
Tomatoes*, canned, whole	19.00	0.92	0.13	595.00	14.20	30.00	0.55	7.80	0.16	1.00	0.09	12.00
Turnip greens, frozen	24.60	2.75	0.34	6539.50	17.88	124.64	1.59	32.31	0.34	2.79	0.06	21.32
Rice*, white, medium grain, cooked	130.00	2.38	0.21	0.00	0.00	3.00	1.49	58.00	0.42	0.30	0.05	13.00

Nutrient analysis was performed on Nutritionist V, version 12.1, and *USDA, Agriculture Research Service, 1999. Nutrient Database for Standard Reference, Release 13 (www.nal.usda.gov/fnic/foodcomp/), serving sizes represented are ½ cup or 100 gm*, edible portion.

† DRVs for protein: pregnant - 6 gm, nursing - 6.5 gm, postpartum - 5 gm, children 1.6 g

Table 7. Comparison of Food Items in Current Standard and Proposed Food Packages

	<u>Standard/Proposed - Pregnant/ Breastfeeding</u>	<u>Standard/Proposed - Postpartum</u>	<u>Standard/Proposed - Children's</u>	<u>Proposed Teen - Pregnant/Breastfeeding</u>
Reduced Fat Milk, 2%	4.5 gallons /4.5 gallons	4.5 gallons /4.5 gallons	4.5 gallons /4.5 gallons	4.5 gallons
Whole Evaporated Milk, canned	1.5 quarts /1.5 quarts	0 / 0	0 / 0	1.5 quarts
Cheese, Kraft Natural Cheddar, Mild	2 pounds /1 pound	2 pounds /1 pound	2 pounds /1 pound	2 pounds
Juice, orange juice, canned	6 cans (6 - 46 fl oz, or 6 - 12 oz frz) /5 cans (5 - 46 fl oz, or 5 - 12 oz frz)	4 cans ((4 - 46 fl oz, or 4 - 12 oz frz) /4 cans (4 - 46 fl oz, or 4 - 12 oz frz)	6 cans (6 - 46 fl oz, or 6 - 12 oz frz) /5 cans (5 - 46 fl oz, or 5 - 12 oz frz)	5 cans (5 - 46 fl oz, or 5 - 12 oz frz)
Eggs, raw	2 dozen /2 dozen	2 dozen /2 dozen	2 dozen /2 dozen	2 dozen
Cereal, General Mills Cheerios	36 ounces /36 ounces	36 ounces /36 ounces	36 ounces /36 ounces	36 ounces
Beans, pinto - dry	1 pound /2 pounds	1 pound /2 pounds	1 pound /2 pounds	2 pounds
Rice, white, medium grain	0 / 2 pounds	0 / 2 pounds	0 / 2 pounds	2 pounds
Vegetables, average of the proposed frozen and canned	0 / 2 pounds	0 / 2 pounds	0 / 2 pounds	2 pounds

Table 8. Comparison of Nutrient Analysis Per Day (RDA/DRI*) of the Standard and Proposed Food Packages

	<u>RDA/DRI*</u> Pregnant Lactating, 1-6 mos. Lactating, 7-12 mos.	<u>Standard Food Package †</u>	<u>Proposed/Teen Food Packages</u>
kcal	2500 2700 2700	825.19	910.90/969.57
Protein, gm	60 65 62	43.30	45.15/48.88
Fat, gm (30% of total kcal)	83 90 90	31.12	26.66/31.46
Dietary Fiber, gm	20 - 35	9.99	12.54/12.54
Vit A (RE)	800 1300 1200	663.63	748.48/780.48
Vit C, mg	70 95 90	112.83	94.40/94.40
Calcium*, mg	1000, (≤ 18 yrs. - 1300) 1000, (≤ 18 yrs. - 1300) 1000, (≤ 18 yrs. - 1300)	1149.89	1073.64/1180.31
Iron, mg	30 15 15	12.29	14.50/14.50
Folate, µg	600 500 500	299.46	444.98/447.69
Zinc, mg	15 19 16	8.87	9.20/9.68
B ₆ , mg	1.9 2.0 2.0	1.24	1.31/1.32
Magnesium, mg Pregnant ≤ 18 yr 19-30 yr 31-50 yr Lactating ≤ 18 yr 19-30 yr 31-50 yr	 400 350 360 360 310 320	 186.85	 221.54/ 221.54

† Pregnant and Breastfeeding Standard Food Package -with beans



JUN 15 2000

United States
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Food and
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Dear Dr. Archer:

We appreciate your submitting an alternative food package proposal from the Texas Department of Health (TDH) WIC Program. However, at this time we are unable to approve the proposal. The Department of Agriculture (USDA) has in clearance a proposed rule which would make certain revisions in the current WIC food packages. During this time, USDA has a moratorium on approving any significant changes to the food packages.

We believe the WIC community will be pleased with the proposed rule. It will address many of the concerns raised over the past few years by providing WIC State agencies with greater flexibility in accommodating food preferences of participants as well as reinforcing the Dietary Guidelines for Americans.

We will be pleased to have your comments on the proposed rule once it is published in the *Federal Register*. We will ask the Southwest Regional Office to advise you when that occurs.

Although we are unable to approve your alternative food package, it is obvious that TDH placed a great deal of time and effort on this proposal. The nutritional analysis is thorough and the cost impact is detailed. We commend your staff on a job well done.

Sincerely,

PATRICIA N. DANIELS

Director

Supplemental Food Programs Division