

the **Chickasaw** *Nation* HEALTH SYSTEM

ISA-02

Bill Anoatubby
Governor

Jefferson Keel
Lieutenant
Governor

December 10, 2003

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

Dear Ms. Daniels,

The Chickasaw Nation is pleased to be given the opportunity to provide the following comments to the advanced notice of proposed rulemaking regarding revisions to the WIC Food Packages:

Chickasaw Nation Comments on Revisions to the WIC Food Package

In general we agree with the recommendations made in the 1999 NAWD WIC Food Prescription Recommendations position paper and in the 2003 NWA Culturally Sensitive Food Prescription Recommendations position paper.

2. We strongly support the recommendations to:
 - Increase consumption of fruits, vegetables, whole grains, and fiber-rich foods
 - Provide a balanced contribution from the major food groups in the Food Guide Pyramid
 - Increase flexibility of States to offer locally available foods that reflect cultural groups served and regional dietary patterns
3. We do not support the idea of reducing the maximum quantities of foods currently prescribed in the WIC Food Package given the fact that States now have the authority to reduce quantities through nutritional tailoring when deemed necessary
4. The following recommendations are viewed as having particular benefit to the Native American culture that we serve:

**CARL ALBERT INDIAN
HEALTH FACILITY**
1001 N. Country Club Rd.
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(580) 436-3980

FAMILY PRACTICE CLINIC
1001 N. Country Club Rd.
Ada, OK 74820
(580) 436-4585

OEH
1001 N. Country Club Rd.
Ada, OK 74820
(580) 436-3160

HEALTHY LIFESTYLES
3115 E. Arlington
Ada, OK 74820
(580) 332-6345

ARDMORE CLINIC
2510 Chickasaw Blvd.
Ardmore, OK 73401
(580) 226-8181

DURANT CLINIC
1600 N. Washington
Durant, OK 74701
(580) 924-7141

TISHOMINGO CLINIC
815 E. 16th
Tishomingo, OK 73460
(580) 371-2362

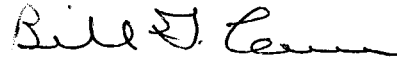
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- Offer choices of grain products in addition to cereals for all women and children. Tortillas, cornmeal, rice, and whole wheat bread are low-fat, iron and vitamin enriched grain selections that would find acceptance in the Native American community.
 - Offer choices of fruits and vegetables—fresh, frozen, or canned in addition to or in partial or full replacement of juice for all women and children. The Chickasaw Nation administers the WIC Farmers' Market program and in 2002 saw a 97.08% redemption rate of the FMNP coupons and in 2003 a 99.85% rate. Making fruits and vegetables available to WIC participants year round would establish a means of providing food package items that are low in fat, sugar, and salt and high in vitamin A, vitamin C, and B vitamins consistent with WIC Food Package design.
 - Offer other alternative protein food items such as canned fish, canned chicken, canned beans/peas (legumes) to all women and children. Beans are a staple food item enjoyed by Native Americans, although in today's society the length of cooking time required for dry beans may not be available. Canned beans, fish, or chicken, would provide a protein alternative readily accessible and more likely to be prepared by cooking or as an addition to salads that participants, especially young mothers, would be more likely to use and to continue to acquire with their own resources.
 - Offer alternative calcium-rich foods such as soymilk, yogurt, corn tortillas, green leafy vegetables and fish with bones. Allowing these substitutions for the milk/cheese component of the Food Package would provide participants, many of whom have varying degrees of lactose intolerance, an acceptable form of calcium-rich foods. These foods are common in the Native American community and are often recommended by nutritionists in counseling participants with lactose intolerance.
5. When considering substitution of foods for core WIC foods currently allowed, a menu selection of appropriate foods allowable as substitutions with types and quantities to provide equal nutrient value should be made available to States. Each State would be able to select the specific food to prescribe for each participant based on local or regional preferences, availability, and cost issues.
 6. States should be allowed to offer food prescriptions that include appropriate WIC foods in combination with a special formula offered in Food Package III based upon participant's medical condition and ability to consume foods.
 7. Maximum allowable quantities of special formulas in Food Package III should take into consideration the yield of reconstituted formula. Due to the lower reconstituted yield of many special formulas, the WIC participant falls short of

the number of ounces of formula necessary to meet nutritional need. Most of the special formulas are cost prohibitive for WIC clients to purchase themselves.

If you have any questions regarding the comments shared please feel free to contact Debi Tipton at 580-310-6420.

Sincerely,



Bill Lance, Administrator
Chickasaw Nation Health System