



THE EASTERN BAND OF CHEROKEE INDIANS

Cherokee W.I.C. 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: Revisions 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 Packages. The Eastern Band of Cherokee Indians (EBCI) WIC Program supports changes and improvements to the WIC food package. We feel it is very important for the food package to reflect current nutrition science and offer foods that are acceptable and enjoyed by the participants we serve.

When changes are made to the food packages, please give consideration to the following:

- make WIC food packages consistent and compatible with **dietary recommendations** in the U.S. Dietary Guidelines for Americans with food quantities and portion sizes that address the nutritional needs of the participants;
- modify the current standard food packages to provide a minimum of 65% of the RDA for the WIC target nutrients, including folic acid;
- set the nutrient content of food prescriptions as the basis for **allowable tailoring**, and not be limited to food-for-food substitutions;
- give flexibility to all states to allow use of a wide variety of **alternative foods** to replace standard food packages, selecting foods based on **regional availability**, participant preferences, cultural acceptability, cost and administrative feasibility; and
- base the cost neutrality of food package changes on the overall cost of **all food packages**, rather than on package-for-package comparisons.

Two reports currently exist, "NAWD WIC Food Prescription Recommendations" and "NWA Culturally Sensitive Food Prescription Recommendation," published by the National WIC Association (NWA) in 2000 and 2003 respectively. Both these reports address the emerging needs posed by the population WIC now serves. Members from the WIC community were given several opportunities to provide input into the development of these documents. These papers provide some great ideas, both practical and economical, which could be incorporated into future changes to the WIC food packages.

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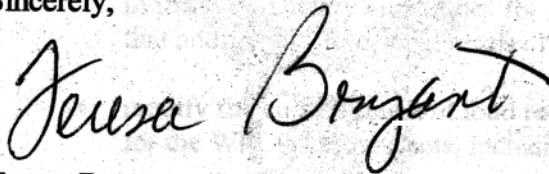
The focus of the food prescriptions should be:

- to help participants establish healthy life-long dietary patterns that promote good health;
 - to provide the tools by which participants can apply the nutrition knowledge gained from counseling and education to make dietary changes to improve their nutritional health; and
- to emphasize the use of reliable, culturally acceptable source of supplemental foods.

The current WIC food packages are now thirty-years-old and its focus was applicable thirty years ago. Since then, nutrition science and its relationship to achieve and maintain good health have evolved. Over these thirty years significant changes in the ethnicity of WIC participants have occurred. Current foods in the WIC food packages may not be acceptable or tolerated potentially setting the WIC participant up to be unable to follow the nutritional advice given during the WIC visit. Food availability has also improved providing more choices of foods that fit current food recommendations. Unfortunately, the existing WIC food packages have outlived their initial benefits and are neither consistent with current dietary guidelines, supportive of cultural needs, adaptable to demographic shifts, nor are they responsive to emerging health issues. It is time for a change.

In closing, as a program director and occasional nutrition counselor, I hope the USDA will take this opportunity and conclude changes to the WIC food package are very much needed. After all, when the food package is out of step with dietary recommendations or when the foods are not eaten, the work and efforts of our staff at the local level can not be successful. Like me, members of the entire WIC community want the best for our participants and will help make newer, improved WIC foods and food packages available to them.

Sincerely,



Teresa Bryant
Manager
Eastern Band of Cherokee Indians WIC Program

