

# Public Health Foundation Enterprises, Inc.

## WIC Program

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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 PHFE Management Solutions WIC Program (PHFE-WIC) supports improvements in the WIC food package which align the food package with current nutrition science and which offer foods that are acceptable and enjoyed by the diverse groups we serve.

As the largest local agency WIC program, PHFE-WIC serves over 316,000 participants every month in Los Angeles and Orange County in the State of California. We provide WIC services to a very diverse population in over seven languages with a large multilingual, multicultural staff. In the last 27 years we have received a lot of participant input, some solicited some unsolicited, about the WIC food package. It is clear from the comments we hear from our participants that they want to see some new and different foods on the food package.

With the WIC community facing new challenges, especially with the obesity epidemic, it is critical that the WIC food packages and individual food prescriptions continue to act together to support participants in implementing recommendations given by WIC nutrition staff in nutrition counseling and education efforts. When the food package is out of step with dietary recommendations or when the foods are not eaten, this successful model breaks down.

The current WIC food packages are now thirty-years-old. Since then, nutrition science and its relationship to achieving and maintaining good health have evolved. A great number of social, economic, environmental, demographic, and other changes have also occurred. Additionally, food availability has improved and there are now many more choices in foods that fit current food recommendations. The existing WIC food packages need adjusting to be consistent with current dietary guidelines, supportive of cultural needs, adaptable to demographic shifts, and to be responsive to emerging health issues. Furthermore, current food packages have a disparate acceptability among minority populations and cultural groups. Some of the high-risk groups most in need of WIC services find certain WIC foods culturally unacceptable. The existing food packages are not fully serving the intended purposes and, in some instances, may negatively impact the health of WIC participants.

### Mission Statement

To nourish, educate, support and empower our clients and ourselves.

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For food package benefits to make a difference for all WIC participants, especially for the culturally diverse populations served by WIC, it is of critical importance for the WIC Program to offer a wider selection of foods and food prescriptions for women and children that acknowledge and reinforce good food choices within recommended dietary patterns.

PHFE-WIC urges the Department to make some bold changes in WIC's approach to the design of a new and updated food package.

In considering changes to the food packages, PHFE-WIC recommends that:

- WIC food packages be made 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.
  - Eliminate or significantly reduce juice from the infant food package. Substitute fruits and vegetable and concurrently reduce juice for all categories to provide up-to 4 -6 ounces per day.
  - Fresh fruits and vegetables be offered on all WIC food packages, including infants over 6 months of age.
  - Calcium and Vitamin D Fortified Soy Milk be an option for all women and children.
- Canned beans be offered as a choice to all women and children in the standard package.
  - Canned fish or meat (salmon, sardines or chicken) be offered as a choice with canned tuna to exclusively BF women.

We join the California State WIC program in urging the USDA to consider inviting key members of the WIC community to assist the Institute of Medicine subcommittee in charge of the phase II review, with operational implementation issues prior to recommending the specific foods. Individuals with WIC experience can offer the valuable expertise needed to develop food packages that are practical and feasible in terms of food delivery, participant acceptance and versatility.

PHFE-WIC looks forward to the revisions in the WIC food packages. We are available as a local resource that has the ability to get participant input quickly and effective and we invite USDA to use us as a resource. We pledge to work with you so that all women and children, and especially those groups most at risk, benefit from culturally appropriate foods and the best nutrition science aligned in the best WIC Program food package we can offer.

Sincerely,



Eloise Jenks, Med, RD  
Executive Director  
PHFE-WIC Program