

Permian Basin WIC Program

2301 N. Big Spring
Midland, Texas 79705

October 7, 2003

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

Re: Revisions to the WIC Food Packages

Dear Ms. Daniels:

As a Nutritionist the WIC Director for WIC Local Agencies since 1978, I am thrilled that USDA is considering making some much-needed changes to the WIC Food Packages. My comments on the Proposed Rules for the Revisions to the WIC Food Packages are as follows.

In general, the WIC Program provides too much milk and cheese. The recommended number of servings of milk for young children is two, and for pregnant and breastfeeding women is three; why do we give them enough milk and cheese for them to have 3.6 servings per day?

Fortified soymilk and plain or vanilla yogurt should be offered as alternatives to milk and cheese. There are so many cultures/populations that neither like nor can tolerate cow's milk products that I wonder if they are actually the norm. We need to quit pretending that dairy products are the only foods in the world that provide calcium!

For those clients who do drink milk, skim milk should be the default choice for everyone, including children over 12 months of age. The Certifying Authority could prescribe whole milk for those women and children who need the extra fat and calories. Although the need for sufficient fat in the diets of children under the age of 2 is well documented, the glut of fast foods and high-fat snack foods in the typical American diet seems to provide for that very well these days.

Beans eggs, and peanut butter are an important source of protein for many of our WIC clients. However, peanut butter is very high in fat so is not always appropriate. In addition, allergies to peanuts are fairly common. Why not offer a few more high-protein alternatives for our clients who are vegans, or from cultures that do not normally eat those foods? My suggestions would be tofu, peanuts, and soy nuts.

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HM

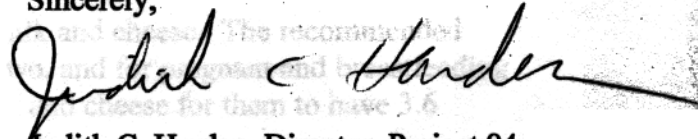
We in the WIC community beat our heads against the wall preaching to moms that they should give their children only 4 to 6 ounces of juice per day, but we turn right around and give them enough juice for their children to have nearly 9 ounces per day! Where is the logic?

We tell clients they need 5 servings a day of fruits and vegetables (only one of which should be juice). We should put our money where our mouths are, and help them buy some! The Farmer's Market Program is great—in the communities where it is available, and during the summer months. With the money we save from decreasing the amounts of milk and juice provided, WIC could provide a pound or two of canned or frozen vegetables each month. It would be nice if we could specify fruits and vegetables that are particularly nutrient-dense, but ANY fruits and vegetables would be beneficial.

I know I should probably back up all my statements with scientific data. However, we've HAD the scientific data for years! It all boils down to whether or not we really want Americans to follow our suggested dietary guidelines to decrease their intake of fat and excessive calories and increase their consumption of fruits and vegetables. The emperor wears no clothes; let's help him get dressed!

Thanks for allowing me the opportunity to express my opinions.

Sincerely,

A handwritten signature in cursive script that reads "Judith C. Harden". The signature is written in black ink and is positioned above the typed name.

Judith C. Harden, Director, Project 94
Permian Basin WIC Program