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NWA-01

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 National WIC Association (NWA) 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.

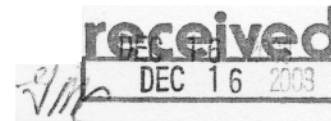
As you know, the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) provides supplemental foods and nutrition education to low-income pregnant, breastfeeding and postpartum women, infants and children. The nutrition education component of the Program ensures positive pregnancy outcomes and guides families in establishing long-term healthy dietary patterns.

As demonstrated at the Montreal Diet Dispensary years ago, nutrition education and an appropriate food package act synergistically to improve pregnancy outcomes and establish healthy dietary patterns. The WIC food packages and individual food prescriptions 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, the successful model breaks down.

The National WIC Association believes that of the WIC food prescription should:

help participants establish healthy life-long dietary patterns that promote good health;

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- 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
- provide a reliable, culturally acceptable source of supplemental foods.

The current WIC food packages are now thirty-years-old. 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 are neither consistent with current dietary guidelines, supportive of cultural needs, adaptable to demographic shifts, nor are they responsive to emerging health issues. Current food packages have a disparate impact on minority populations and cultural groups. Indeed, some of the high-risk groups most in need of WIC services find some foods culturally unacceptable. The existing food packages are not fully serving their intended purposes and, in some instances, may negatively impact the health of WIC participants.

For food package benefits to make a difference for all WIC participants, especially the culturally diverse populations served by WIC, it is critically important for the WIC Program to offer a wider selection of foods that reinforce sound food choices within recommended dietary patterns.

Two position papers (attached), "*NAWD WIC Food Prescription Recommendations*" and "*NWA Culturally Sensitive Food Prescription Recommendation*," published by the Association in 2000 and 2003 respectively, address the emerging needs posed by the population WIC now serves.

In considering changes to the food packages, NWA recommends that:

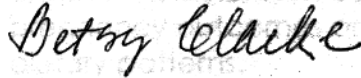
- WIC food packages be made consistent and compatible with dietary recommendations in the U.S. Dietary Guidelines for Americans with food quantities and portion sizes that address the nutritional needs of the participants.
- the current standard food packages be modified to provide a minimum of 65% of the RDA/DRI for the WIC target nutrients, including folic acid.

- the nutrient content of food prescriptions be the basis for allowable tailoring, and not be limited to food-for-food substitutions.
- States be given the flexibility to select from a wide variety of alternative foods, based on regional availability, participant preferences, cultural acceptability, cost and administrative feasibility, to replace foods in the standard food packages.
- the cost neutrality of food package changes be based on the overall cost of all food packages, rather than on package-for-package comparisons.

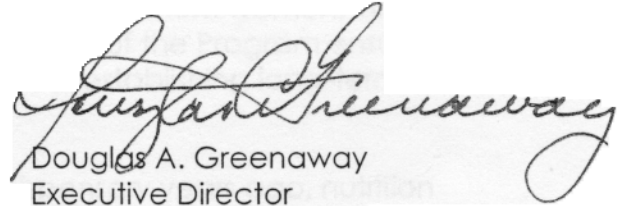
The National WIC Association looks forward to further dialogue with USDA/FNS in revising the WIC food packages. We pledge to work with you so that all women and children, and especially those groups most at risk, benefit from culturally appropriate foods and the best nutrition science aligned in the best WIC Program food package we can offer.

Should you require further information or if we may be of further assistance, please contact us at (202) 232-5492.

Sincerely,
NATIONAL WIC ASSOCIATION



Betsy Clarke
President



Douglas A. Greenaway
Executive Director