



CENTER ON BUDGET AND POLICY PRIORITIES

PI-01

December 5, 2003

Ms. 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

Dear Ms. Daniels:

We appreciate the opportunity to comment as the Department reviews the WIC food package and considers revisions to better improve the nutritional intake, health, and development of WIC participants. The Center on Budget and Policy Priorities has had a longstanding interest in WIC and has worked over the past two decades for policies to strengthen and improve the program.

We are pleased that the Department is reviewing the WIC food package and believe that such a review is in order given the advances in nutritional research and the programmatic and demographic changes that have occurred since the current food package was established in 1980. To ensure that the WIC food package remains up-to-date and reflects the best thinking about the specific nutritional needs of WIC's target population, we recommend that such a review be undertaken regularly every ten years to incorporate the latest research and program trends.

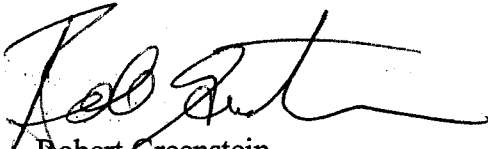
We believe that two overriding principles should guide decisions about changes to the WIC food package.

First, changes in the food package should be based on the best scientific evidence and should not be influenced by specific food industries or manufacturers. The WIC food package is intended to provide specific nutrients found to be lacking in the diets of WIC's eligible population. The inclusion or exclusion of specific foods must be based on how well they achieve this goal. We recognize that there are a number of important considerations in selecting individual food items, but we strongly believe there must be a scientific basis for all decisions concerning the food package content. The statute creating the WIC program recognized the role of nutritional research in defining WIC's supplemental foods. The process for revising the food package must continue to be governed by nutritional research and not influenced by outside interests.

Second, revisions to the food package should preserve state flexibility and opportunities for cost containment. While federal law establishes the overall content of the food package, states have considerably flexibility in determining the specific items and brands to allow under their programs. State decisions reflect a variety of considerations about participant preferences, and the availability and costs of various foods. We believe that any changes in the WIC food package should continue to allow state flexibility to best meet the needs of participants and to maintain opportunities for cost containment. WIC emphasizes cost containment to stretch limited funds to serve the maximum number of eligible women, infants, and children. One means by which states often contain program costs is by limiting foods to certain items or brands within the broad federal parameters. We encourage the Department to consider the implications of any changes in the food package on these cost containment efforts.

We wish you success in this endeavor and look forward to reviewing the proposed rule. Thank you for the opportunity to comment on this important issue.

Sincerely,



Robert Greenstein
Executive Director



Sandra Clark
Senior Policy Analyst