



PI-11

CHILDREN'S ALLIANCE
Celebrating 20 Years of Child Advocacy

December 12, 2003

Patricia Daniels, Director
United States Department of Agriculture
Supplemental Nutrition Programs
Food and Nutrition Service
3101 Park Center Drive, Room 520
Alexandria, Virginia 22302

REVISIONS TO THE WIC FOOD PACKAGE, 7 CFR PART 246

Dear Ms. Daniels:

We appreciate the opportunity to comment on Public Notice 7 CFR Part 246, Revisions to the Women, Infants, and Children (WIC) Food Packages. WIC is a critical program for low-income families and it is important that the food package provides foods that contribute to a healthy diet and are culturally appropriate. The current WIC food package is no longer consistent with the Dietary Guidelines for Americans. Nor does it accommodate cultural food preferences. Therefore we recommend the following:

1. Continue to offer iron-fortified infant formula, infant cereal, milk, iron-fortified breakfast cereal, cheese, Vitamin C-rich fruit and vegetable juices, beans, peanut butter, eggs and (for breastfeeding women) carrots and tuna fish. These items provide essential nutrients that have been shown to be lacking in the diets of low-income pregnant women and children.
2. Do not lower the amount of any WIC food with the exception of juice (see recommendation #3).
3. Reduce the amount of fruit juice offered for all categories to provide a maximum of 4-6 ounces per day but only if substituted with fresh fruits and vegetables high in Vitamins A and C.
4. Provide 2 percent reduced fat, 1 percent low fat, and nonfat milk for all categories above 2 years old. Require states to offer reduced fat and low fat cheeses in addition to regular cheese.

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5. Many ethnic groups are not accustomed to drinking milk and some WIC clients may have problems with lactose intolerance. Add more high calcium food choices including low-fat yogurt and soymilk fortified with Vitamins A and D. Allow yogurt or tofu processed with calcium as a substitution for cheese.
6. Expand the current cultural food package regulatory provisions to allow for a food-package to food-package based system of substitution of nutrient-dense culturally appropriate foods.
7. In light of research that reveals the importance of folate in preventing birth defects, it should be added as a key nutrient.
8. The WIC food package evaluation should be comprehensive and include an evaluation of current health and nutritional needs and cultural preferences of the WIC population.

Thank you again for the opportunity to comment.

Sincerely,



Linda Stone
Interim Executive Director
Children's Alliance