

Patricia Daniels
USDA, Director, WIC
3101 Park Center Drive, Room 520
Alexandria, Virginia 22302

Dear Ms. Daniels:

Thank you for the opportunity to provide comments and recommendations on "Revisions to the WIC Food Packages." When making changes to the food package we at **Just Harvest** feel that it is very important to ask the opinion of those using the program what they would like to see. Often times decisions are made on the behalf of an individual or group of people with out their input which can be a barrier to participation in such a program as WIC. We commend you on your insightfulness in this matter. With that I offer the following recommendations as a past participant in the WIC Program and in my professional opinion as Child Nutrition Advocate:

1. All the types of food currently in the WIC food packages, including 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, should be retained because each type of food makes an important contribution to the nutritional content of the package.
2. Increase the types of foods offered in the standard WIC food packages by adding a fruits and vegetable category and by adding more high calcium food choices including yogurt and soymilk. From my experience as a parent, children who eat fresh fruit and vegetables at an early age is more likely to continue to eat them throughout adolescents and teen years to adulthood. My children used WIC during my pregnancy to age five. They receive the Farmer's Market Nutrition Vouchers so they were exposed to various kinds of fruit and vegetables and they continue to eat them to this day. They make healthy food choices during lunch at school. Such as choosing the fresh green salads or vegetable sticks instead of the french fries, or the broccoli/cauliflower and ranch dressing over other unhealthy foods. I give a lot of the credit to the WIC program because if it was not for WIC, I would not have been able to purchase those vegetable for my children.
3. The rules should better accommodate cultural food preferences through an expansion of USDA's current cultural food package regulatory provisions to allow for food-package to food-package based system of substitution of nutrient-dense culturally appropriate foods. In my work as a child nutrition advocate I have spoken with individuals who were either Muslim, vegetarians, and the such that have not used WIC or dropped out of the program because they couldn't use some or all of the food packages items. I've also spoke to individuals whose children are allergic to milk products but there are no alternative for them so therefore they also leave the program. However, it is important to emphasize that this system would not allow the child receiving the cultural food package to be short changed-the nutritional and economic value of the children's cultural WIC food package must be equal to the value of the standard children's WIC food package.

received

DEC 17

SPK

Preserve Emphasis on Key Nutrients in WIC Food Packages

The WIC food packages should continue as a special supplement of nutritionally dense foods that supply key nutrients important to the health and development of pregnant women, new mothers, infants and children. The current key nutrients – iron, calcium, Vitamins A and C, and protein – should be retained. The B vitamin, folate, should be added as a key nutrient based on research revealing its importance in preventing birth defects. Other nutrients should be considered based on the findings of the Food and Nutrition Board WIC review.

Protect Nutritional Integrity of Food Package by Retaining Strong Nutritional Standards

Food package revisions should protect the nutritional integrity of the WIC food packages by maintaining the current stringent nutrition standards for WIC foods. These standards include high requirements for iron in cereals and Vitamin C in fruit and vegetable juices, as well as limits on sugar and fat, including prohibition of high sugar cereals and sweetened juice or milk.

Retain Current Targeting of WIC Food Package Benefits

The current fair and effective system of targeting WIC food package benefits should be retained. For example, we oppose reducing, as some have suggested, the size of the WIC food package for young children by shifting resources toward other food packages. Reducing the size of the WIC food package for young children will diminish WIC's positive impact on the health and nutritional status of children enrolled in the program. The negative impact of reducing the nutritional support for these nutritionally at-risk young children during one of their most crucial periods of physical and cognitive growth and development could last a lifetime. Less WIC food for these young children will also result in more non-WIC foods, which according to the recent Mathematica study, FITS, all too often include unhealthy junk food such as french fries, sweetened drinks and candy.

The WIC food package functions not just as a source of nutritional support but also as an incentive to bring clients into the WIC clinic and engage them with the clinic's nutrition education and referrals to health care. This incentive is important: if parents decide not to enroll their children in WIC because the children's food package is too small to be worth the effort, then the children can't reap any of the program's benefits.

WIC Food Package Evaluation Should Be Comprehensive

Since the food packages were last reviewed, there has been an explosion of research and recommendations related to nutrition and health. The planned review should include an evaluation of the current health and nutritional needs, dietary habits and food preferences of the WIC population as a basis for understanding how to apply the new science to the WIC food packages. This understanding should be used to make revisions that maximize the nutritional, food security and incentive value of the packages and, consequently, WIC's ability to continue to offer foods that empower WIC families to make the best choices for their health.

Thank you for giving me the opportunity to share my comments and recommendations

Sincerely,


DeShauna Ponton

Child Nutrition Advocate-Just Harvest