



WASHINGTON ASSOCIATION OF LOCAL WIC AGENCIES
WALWICA

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.

- WIC food prescriptions should be consistent and compatible with dietary recommendations made in the "Dietary Guidelines for Americans" (USDA & USHHS 1995) by offering standard portions of the recommended numbers of servings from each food group in the Food Guide Pyramid and targeting specific nutrients that address the nutritional needs of participants
- 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. 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.
- Allow states the ability to offer food prescriptions that include all WIC foods in combination with a special formula offered in Food Package III
- Continue to offer iron-fortified infant formula, infant cereal, milk, iron-fortified and low sugared (less than 6 grams of sugar/ounce) 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. Do not lower the amount of any WIC food with the exception of juice.

- Reduce the amount of fruit juice offered for all categories to provide a maximum of 4-6 ounces per day if the calories are substituted with fresh fruits and vegetables high in Vitamins A and C. If calories are not replaced with equally nutritious food then the total juice food package should remain the same.
- In light of research that reveals the importance of folate in preventing birth defects, it should be added as a key nutrient.
- Complete research and policy analysis to support planning and implementing of the food package prescriptions. 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,



Dori Johnson
President