

Association of **Public Health** **State & Territorial** **Nutrition Directors**

December 15, 2003

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
USDA
3101 Park Center Drive, Room 520
Alexandria, Virginia 22302

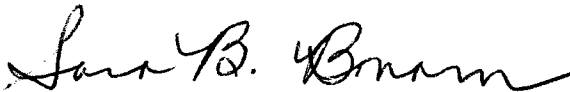
RE: Proposed Rules, Federal Register Vol. 68, No. 178

Dear Ms. Daniels:

The Association of State and Territorial Public Health Nutrition Directors applauds USDA for opening the WIC Food Package for comment, and appreciates the opportunity to submit comments on behalf of our membership. The WIC food package has improved the nutrition of women, infants and children over the last thirty years. However, with the radical changes that have occurred in food consumption patterns and in the nature of health risks associated with diet, a reexamination is due. We look forward to the announcement of a revised WIC food package that is responsive to the health, economic and cultural needs of the population served.

Our Association represents public health nutrition leaders in every state and territory, including a network of over 250 public health nutritionists working to improve the health of the American population through statewide and community initiatives.

Sincerely,



Sara Bonam, MS, RD
President

Cc: Bd. of Directors

received
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Association of State and Territorial Nutrition Directors Comments on the WIC Food Package

Please indicate what elements of the WIC food packages you would keep the same and why.

The Association supports maintaining the following principles in setting criteria for the food package:

- The food package provides nutrients lacking in the diets of the target population.
- Products in the food package are available at reasonable cost
- Fat, sugar and salt are limited to reasonable levels.
- Foods are selected after considering market availability, variety in selection and ability to apportion the food into individual servings.
- The food package allows flexibility for individuals in meeting their nutritional goals.

The following food specific criteria should be maintained:

- Retain the requirement that infant and child/adult cereals meet existing standards for sugar and iron. Specify that cereals with dried fruit must conform to the 6 gram sugar requirement.
- Retain the requirement that juice be 100% juice fortified at existing levels of vitamin C.

2. What changes, if any, are needed to the types of foods currently authorized in the WIC food packages?

The following changes are recommended:

Proposed Change	Rationale
Add a choice of fresh, frozen or canned vegetables, for women and children.	<ul style="list-style-type: none"> • Increase Vitamin A • Added fiber • Micronutrients added with few additional calories
Allow calcium fortified soy milk as a substitute for milk.	<ul style="list-style-type: none"> • Provide options for certain ethnic groups • Provide alternative calcium source to individuals with milk allergy or lactose intolerance.
Provide supplemental foods in addition to formula in food package 3 (special woman/child).	Women and children on formulas may be able to advance to other foods while decreasing consumption of the formula. Flexibility should be allowed to meet nutritional goals.
Allow canned beans (no added bacon or pork) as an alternative to dry beans and peas.	<ul style="list-style-type: none"> • Dry beans and peas are time consuming to prepare. Proposed change would encourage greater consumption of dry beans and peas • Increase folic acid
Allow yogurt as a substitute for milk	<ul style="list-style-type: none"> • Dairy product which may be more acceptable for those with lactose intolerance • Popular food with certain ethnic groups.

Proposed Change	Rationale
Allow substitution of canned salmon and canned chicken for tuna for breastfeeding women.	<ul style="list-style-type: none"> • Increase acceptance of food package with alternative protein sources for breastfeeding women
Allow tofu as a substitute for dry beans and peas/peanut butter.	Increase acceptance by certain ethnic groups and vegetarians.
Allow states the option of allowing fruit as a substitute for juice.	<ul style="list-style-type: none"> • Supports the 5 A Day philosophy. • It may be difficult for states to predict costs associated with adding fruits to the food package.

3. Should the quantities of foods in the current WIC food package be adjusted?

The following items currently provide greater than recommended levels of the targeted nutrients. It is suggested that they be reduced in quantity:

- Decrease the amount of juice allowed for children. The current allotment is 288 ounces/month which provides over 9 ounces/day. A 6 oz serving (180 oz/month) provides 100% of the vitamin C. The decrease in cost can cover the cost of adding vegetables.
- Delay introduction of juice for infants to 8 to 12 months. Vitamin C provided by juice is provided in formula; therefore it is not a necessary component of the diet. However, when juice is added the nutrition educator has the opportunity discuss introducing a cup.
- Decrease the amount of milk to 16 quarts for children and postpartum women and 20 quarts for pregnant and breastfeeding women, with the exception of pregnant and lactating adolescents.
- Decrease eggs from 2 ½ dozen to 2 dozen.

Other adjustments include:

- Ensure that all infants received the allowed amount of formula; allow WIC agencies to round up when the can sizes do not provide the full amount allowed.
- Eliminate the substitution of cheese for milk.
- Provide no more than 1 pound of cheese for children, pregnant, breastfeeding and postpartum women.

4. What nutrients should be established as priority nutrients for each category of WIC participants?

- Continue to provide protein, calcium, vitamin A, vitamin C and iron in the WIC food package. Calcium and vitamin C needs will be met despite decreasing the amounts of milk and juice. Vitamin A and other nutrients will be increased in the food package by adding vegetables. Do not allow potatoes.
- Consideration should also be given to the availability of other nutrients that are often low in diets of the target population, including folate, magnesium, zinc, vitamin B6, and fiber in the food package.

5. How can the WIC food package be designed to have a positive effect on overweight concerns?

The following recommendations address weight related issues:

- Milk, juice and cheese are reduced to amounts that are more reasonable for the target population.
- Adding vegetables increases fiber.
- Several states currently provide lower fat milks as the standard in their food packages. While this adjustment will lower fat content and likely impact the prevalence of overweight, it is recommended that this decision be left to the each state.
- The food package provided to the participant should reflect the nutrition and health messages that participants hear.

6. Are there other concerns that affect foods issued through the WIC food packages that should be considered in designing the food packages?

Recommendations in this document describe options that can meet a variety of needs based on cultural food preferences, allergies or individual beliefs such as vegetarianism.

- Soy milk substitution for milk: increase acceptability for Asian populations, vegetarians and those with a milk allergy.
- Tofu substitution for dry beans/peas or peanut butter: Asian populations, vegetarians and those with a peanut allergy.
- Addition of vegetables will increase the variety and acceptability of the food package.

The following recommendations should guide the design of the food package:

- Choices should be available within each Food Guide Pyramid category. For example, cereal choices should provide a variety of grains.
- Exceptions to policy should be allowed for states to meet their particular needs.
- Additionally, it is recommended that the food package be reviewed periodically by the Institute of Medicine to ensure consistency with the dietary guidelines, and nutrition science, market trends and population trends.
- Evaluate the administrative impact of adding new foods and more flexibility within categories.
- Consider how food package changes will affect states that are moving to EBT.

Food package III for Special children and special women currently provides formula. Since persons who require formula to maintain their nutritional status are also consuming other foods, or transitioning to other foods, it is recommended that food package III be expanded to include foods allowed for other women and children.

Rice is a staple food for Asians, Hispanics and other populations. It has been suggested that rice should be included in the food package to make the package more attractive to the ethnically diverse populations WIC serves. However, rice, as currently marketed, does not provide the targeted nutrients. Since those who wish to

consume it can obtain rice rather inexpensively, it is not recommended for inclusion in the WIC food package.

7. What data should the department consider in making decisions regarding revisions to the WIC food packages?

- Data collected by state WIC programs from WIC participant surveys
- Responses to these reviews by state and local WIC agencies.
- Nutritional needs of the target population
- Food consumption data (i.e. CSFII)
- Significant public health issues heavily influenced by nutritional intake (i.e. pediatric overweight, adult obesity, diabetes, CVD, cancer)
- Dietary Guidelines & the Food Guide Pyramid
- Changing trends: population, market trends, agricultural changes,

8. Should participants be allowed greater flexibility in choosing among authorized food items?

Choices within each category of the Food Guide Pyramid will increase satisfaction for the participant while ensuring that targeted nutrients are provided.

9. How can WIC food packages best be designed to effectively meet nutritional needs in culturally and ethnically diverse communities?

These issues have been addressed previously in this document by:

- Allowing soy milk as a substitute for milk
- Allowing tofu as a substitute for dry beans/peas or peanut butter
- Including vegetables in the food package
- Allowing canned salmon or chicken to replace tuna

The ability to select from more choices in the food package should be available to all participants who choose them, not just those who belong to certain ethnic groups or have specified medical conditions.

10. Should WIC state agencies be afforded more or less flexibility in designing WIC food packages?

- The proposed additions provide an array of possibilities. States should be allowed to select those that are most appropriate for their state. Market conditions, food preferences and population mix will vary from state to state.
- Include a provision for states to submit documentation to USDA to request an exception to policy to meet special needs within the state.

11. Recommend/identify WIC food selection criteria, describe how the criteria interact, indicate their relative weighting or importance, and provide supporting rationale.

- Nutrition integrity should continue to be the primary criteria for selecting foods in the WIC food package.

Association of State and Territorial Nutrition Directors

- Foods provided in the WIC food package should be easily administered at the state level. Consideration should be made on how food package changes will impact WIC vendor operations.
Foods should be available year round.
Cost, convenience and appeal to participants should also be considered.

Additional comments:

- The Association recommends that the IOM reevaluate the food package periodically to ensure that the food package remains relevant to the current market, nutrition science and population trends.
- Do not allow weight loss products, sports drinks, salad bar vegetables, energy bars, instant breakfast drinks or any such product not in keeping with the mission of the program.
- A reasonable implementation period should be allowed for states to make the food package changes. Twelve to eighteen months may be needed to make the computer changes necessary.