



**WIC Advisory Board**  
Special Supplemental Nutrition Program for  
Women, Infants & Children

SWA-04

December 15, 2003

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

Re: Revisions to the WIC Food Packages

Dear Ms. Daniels,

The Oregon WIC Advisory Board respectfully offers the following comments to the advanced notice of proposed rulemaking regarding revisions to the WIC food packages. We, the members of the Oregon WIC Advisory Board, recommend the following:

1) Recommendation: WIC food packages should allow states the option of the following substitutions for part or all of the milk and or cheese currently provided in the packages for all categories. Fortification should include nutrients such as calcium, vitamin D and riboflavin.

- Fortified soy milk
- Fortified rice milk, if available
- Fortified yogurt, low or no sugar
- Canned Fish (See Recommendation 6 below.)

Rationale: It is critical that alternatives to milk and cheese be provided, as a high percentage of WIC participants are lactose-intolerant, and/or do not use dairy as an element in their diets for ethnic or cultural reasons. This percentage is increased in communities of color, as African Americans and Asians are more likely to be lactose-intolerant than are Caucasians.

2) Recommendation: WIC food packages should allow the substitution of equivalent weight of any raw or roasted, non-flavored nuts and/or seeds, whole or as a spread, for currently available peanut butter. Peanut butter and nuts should be allowed only for women and children 2 years or older.

Rationale: Peanut butter presents two pronounced risks to the WIC community under the age of two. These risks are the potential for allergic reaction and the potential for choking. Nuts and seeds are high in nutrients, as well as protein, and offering a variety increases the likelihood that this source of nutrients will be purchased and consumed by WIC participants for whom they are appropriate.

*WIC -- 25 Years of Building a Healthier Oregon*

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3) Recommendation: Expand the availability of canned beans, in the same varieties as currently allowed in dried form, to appropriate food packages, in addition to the food package for homeless participants.

Rationale: Beans are an excellent source of nutrients and fiber, but not always selected by WIC participants. Many participants lack the time and/or cooking skills or equipment to prepare dried beans. Providing them in this alternative form is likely to increase consumption by participants. If a lesser amount is offered in cans than is offered dried, the substitution could be cost neutral.

4) Recommendation: Allow any vegetable or fruit high in vitamin A to be substituted for the carrots currently provided in the breastfeeding package. An example of an appropriate substitution would be apricots.

Rationale: Making alternatives available increases the likelihood that this nutrient will be consumed by participants.

5) Recommendation: Allow the substitution of fresh, frozen, dried or canned (without sugar) vegetables and/or fruits for some or all of the juice currently offered in the WIC food packages. Vegetables and fruits could be substituted at one pound fresh, canned or frozen for every quart of prepared juice allowed. States should be allowed to determine appropriate substitutions, which address cultural needs and seasonal and regional availability of these products.

Rationale: This substitution is critical for support of current nutritional science related to the importance of the daily consumption of vegetables and fruits. Research shows that many low-income families do not purchase vegetables and/or fruits in adequate quantities to meet nutritional needs due to the high cost relative to other high fat, high sugar, prepared foods. This substitution would assist in increasing WIC participants' consumption of fiber, antioxidants, vitamins A and C, and many micronutrients. An increased consumption of vegetables and fruits is known to reduce the incidence of cancer, high blood pressure, diabetes and obesity. Additionally, a reduction in consumption of juice would reduce overall caloric intake and incidence of tooth decay, particularly in WIC children. Substituting vegetables and fruits could also bring the provision of juice through WIC down to the Food Pyramid Guidelines of 4 cans/month, rather than the 6 cans/month currently allowed. Providing vegetables and fruits on WIC food packages would allow participants to apply the knowledge gained from the nutritional counseling they receive in WIC.

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6) Recommendation: Allow the substitution of canned salmon, mackerel and/or sardines for currently available canned tuna, and make canned fish available on food packages for pregnant women and children 4 years and older. Canned fish could be substituted for some of the milk, if cost neutrality is required.

Rationale: Concerns regarding mercury content in tuna make it appropriate to allow substitutions that will also be rich in protein, vitamin E, and other important nutrients. Those participants who do not or cannot consume dairy would be provided with an alternative source of protein with this substitution.

7) Recommendation: Increase the maximum infant formula allowed to the amount needed to sustain the participant for the entire month and allow averaging of infant formula across months, to provide maximum amount of formula allowed on the program.

Rationale: Many low-income mothers cannot afford the cost of infant formula and infant formula is rarely provided through other food programs, such as CSFP or food banks. Families who cannot afford to buy an adequate amount of infant formula for their babies often resort to thinning formula with water, thus risking that the infant may not receive adequate nutrition. Averaging is needed to accommodate formula can sizes that do not allow participants to purchase the maximum allowable, unless averaging is used.

8) Recommendation: Include other WIC foods on the food packages of women and children who receive special formula.

Rationale: Families receiving special formulas are still in need of other supplemental foods to assure adequate nutrition, particularly when only small amounts of special formula are prescribed.

9) Recommendation: Allow calcium-fortified juice for all WIC participants, without a prescription.

Rationale: The addition of calcium would assist all WIC participants in meeting the minimum daily requirement for calcium. It also allows the calcium to be consumed with vitamin C, which aids in its absorption. Calcium-fortified juice is generally not more expensive than equivalent non-fortified juice.

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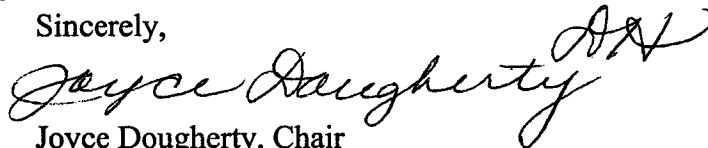
10) Recommendation: Adopt the National WIC Association's "Culturally Sensitive Food Prescription Recommendations."

Rationale: The recommendations included in the above document address the significant demographic changes that have taken place in the WIC population over the past 20 years. The alternative food packages recommended therein contain nutritious foods that reflect the dietary patterns of a broad range of WIC participants. It is of particular importance that these food packages not be restricted to certain ethnic or cultural groups, but that they are offered as options to any WIC participant for whom the package(s) is categorically appropriate.

We would also like to take this opportunity to recommend that USDA continue to move the WIC Program toward the use of EBT cards for participant purchasing of WIC foods, and that USDA increase efforts to coordinate services among all Child Nutrition Programs.

The Oregon WIC Advisory Board is encouraged by USDA's intent to make changes in the WIC food packages and we appreciate the opportunity to contribute to the concepts to be applied in making those changes.

Sincerely,



Joyce Dougherty, Chair  
Oregon WIC Advisory Board