

# CALIFORNIA WIC ASSOCIATION

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, VA 22302

## REVISIONS TO THE WIC FOOD PACKAGE, 7 CFR PART 246

Dear Ms. Daniels:

Thank you for the opportunity to comment on Public Notice 7 CFR Part 246, Revisions to the Women, Infants, and Children (WIC) Food Packages. California WIC Association, representing 82 Local WIC Programs serving close to 1.3 million persons, looks forward to major revisions as soon as possible after the Institute of Medicine's scientific review.

The current WIC food packages have not significantly changed since the program's inception. Since that time, however, not only has the demographic and ethnic makeup of the WIC population itself shifted, but the food and activity environments where WIC participants live have also undergone rapid change (most of it negative). Food availability, variety, choice and costs are all quite different, and sedentary behavior has increased.

Obesity has become a major public health crisis, and, while hunger and food insecurity persist, a large proportion of WIC participants are at higher risk for the extremely negative health consequences of this serious nutrition problem. An updated food prescription that meets the Dietary Guidelines, especially by including fresh fruits and vegetables, is badly needed if WIC is to successfully change shopping and eating behaviors to combat obesity, while at the same time continuing to prevent household food insecurity, hunger, and its negative consequences. These two program goals are not mutually exclusive.

The existing WIC food packages are neither consistent with current dietary guidelines, supportive of cultural needs, adaptable to demographic shifts, nor are they responsive to emerging health issues. Furthermore, current food packages have a disparate impact on minority populations and cultural groups. Particularly in a state like California, many of the high-risk groups most in need of WIC services find some foods culturally unacceptable. The existing food packages are not serving the intended purposes and, in some instances, may negatively impact the health of WIC participants.

1010 11TH STREET, SUITE 205  
SACRAMENTO, CALIFORNIA 95814  
TELEPHONE 916 448 - 2280  
FAX 916 448 - 7826  
www.calwic.org

**received**  
DEC 19 2003

*SPIC*

This review is an opportunity to re-tool WIC's "cornerstone," the food prescription. The WIC food package is a major driver of the individual, family, community and even national market changes to food choices and the overall food environment. **CWA strongly supports the detailed and thoughtful proposals being submitted by the California Department of Health Services, WIC Supplemental Nutrition Branch.**

Branch staff worked with CWA, local agencies, and other nutrition experts in state government to compile this comprehensive package. The specific examples of reconfigured packages put forward in the Branch proposal show how specific changes can be operationalized, once the IOM carefully reviews the nutritional content issues. If and when the food package is revised, we look forward to actually being able to offer WIC families more appropriate and flexible choices along these lines, and use the WIC food package itself – our most important nutrition education tool -- to model healthy food choice.

CWA strongly urges USDA to support our proposal, pending in the Child Nutrition Reauthorization process, to authorize pilot-testing the delivery of fruits and vegetables through the WIC food package in advance of final food package revisions, in order to allow states to work out operational and educational issues. This will allow a more efficient, effective and rapid national implementation of a long-awaited reform.

Thank you for the opportunity to provide comments on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "L. True". The signature is fluid and cursive, with a large initial "L" and a stylized "True".

LAURIE TRUE, MPH  
Executive Director