

November 3, 2006

NOV 03 2006

Patricia N. Daniels
Director, Supplemental Food Programs Division
Food and Nutrition Service
USDA
3101 Park Center Drive
Room 528
Alexandria, VA 22302

PI -75

RE: "Docket ID Number 0584-AD77, WIC Food Packages Rule

Dear Ms. Daniels:

The Nutrition Consortium of NYS strongly supports USDA's proposed WIC Food Packages Rule. The new package allows WIC participants to purchase healthier foods with higher nutritional quality, increases the cultural appropriateness of the program, and expands food choices for WIC participants. The proposed package will align the WIC food package more closely with updated scientific research and information on nutrition and health.

We are very excited by many of the components of the proposed package, including the addition of fruits and vegetables, whole grain products, and allowing the options of soymilk and tofu. These positive changes will help mothers to make healthier food choices, improving their nutrition and better enabling them to maintain a healthy weight. For children, who are in the process of developing eating habits which will stay with them into their adult lives, this nutritionally improved food package will have a lasting positive impact.

One excellent component of the new WIC food package that we fully support is the inclusion of fruits and vegetables. Current nutritional research shows that consumption of fruits and vegetables is essential to maintaining good health and preventing obesity. This is reflected in the 2005 Dietary Guidelines for Americans as well as the Institute of Medicine's recommendations for the new WIC package.

In light of the importance of fruit and vegetable consumption, we recommend expanding the fruit and vegetable benefit to fully meet the IOM's recommendations. Also, to prevent a potential future decrease in the amount of fruits and vegetables that can be purchased with WIC coupons, we recommend that the benefit level for fruit and vegetable coupons be required to adjust with inflation.

Another positive element of the new proposed WIC package is that participants will be able to buy food which is more culturally appropriate than what is allowed by the current package. We support including the option of soy milk and tofu, which is particularly beneficial to participants with lactose intolerance or milk allergies. These are conditions

that disproportionately affect African-Americans and Asian-Americans. In the proposed package, women can get soymilk and tofu without a prescription, but children will require a prescription. We recommend removing the prescription requirement, as it may pose as a barrier to many low-income families looking to obtain these alternatives.

Additionally, while we strongly support the inclusion of whole grains in the package, we recommend that the whole grain cereal standard be modified to include cereals that are whole grain corn-based (i.e. corn flakes), rice (i.e. puffed rice) and bran (i.e. bran flakes). If these grains are excluded, it will prevent many WIC participants from obtaining culturally appropriate cereals.

Finally, we commend the inclusion of farmer's markets as vendors for the new WIC food package fruit and vegetable vouchers. This will benefit WIC participants by enhancing their access to fresh local produce, as well as prove beneficial to local growers by expanding the number of customers with the resources to purchase their fruits and vegetables.

We appreciate the opportunity to comment on this exciting new WIC food package proposal and truly commend USDA in this effort to bring a healthier food package to WIC recipients in New York and throughout the United States. The new package will do much good for New York families and we look forward to its implementation.

Sincerely,

A handwritten signature in black ink that reads "Casey Dinkin". The signature is written in a cursive, flowing style.

Casey Dinkin
Child Nutrition Outreach Coordinator
Nutrition Consortium of NYS

NOV 04 2006

November 1, 2006

Patricia N. Daniels
Director, Supplemental Food Programs Division
Food and Nutrition Service
USDA
3101 Park Center Drive
Room 528
Alexandria, VA 22302

PI - 77

RE: "Docket ID Number 0584-AD77, WIC Food Packages Rule

Dear Ms. Daniels:

As a member of the **Massachusetts Nutrition Board**, I strongly and enthusiastically support the USDA issued proposed rule governing the WIC Food Packages published in the Federal Register on August 7, 2006. The Board is a state advisory board that is a resource on matters related to the nutritional status of citizens in the Commonwealth of Massachusetts. The Board is comprised of leaders in the field of food, nutrition and health and influential members of their community who serve as advocates on issues of food and nutrition.

The proposed regulations improve the nutritional health of all WIC participants and are grounded in sound science, align with the *2005 Dietary Guidelines for Americans*, support the current infant feeding practice guidelines of the American Academy of Pediatrics, and support the establishment of successful long-term breastfeeding. The proposed food packages provide WIC participants with a wider variety of food choices, allow state agencies greater flexibility in offering food packages that accommodate participants' cultural food preferences, and address the nutritional needs of our nation's most vulnerable women, infants and children.

The proposed rule reflects recommendations made by the Institute of Medicine (IOM) of the National Academies in its report, "WIC Food Packages: Time for a Change." It follows the advice of the Institute, which stated that the WIC Program needs to respond to changes in nutrition science, demographics, technology, and the emerging health concerns in the WIC community. The changes in the proposed rule are consistent with nutrition education promoting healthier lifestyles and food selections to reduce the risk for chronic diseases and to improve the overall health of WIC's diverse population. The Department's aim is to add new foods while preserving cost neutrality—to cover the cost of the new foods, the proposed adjustments to juice, eggs and milk are highly acceptable. We believe that WIC clients will be pleased that there will be more choices in the foods offered.

The **Massachusetts Nutrition Board** has the following recommendations regarding the proposed rule.

Breastfeeding

The proposed rule aims to support breastfeeding, with appropriate complementary foods after the first six months, until the infant's first birthday.

- *We do not support* the recommendation to pilot test the food package for the partially breastfeeding woman. With a delay in implementation of the partially breastfeeding package, we believe that many women will simply choose to formula feed in order to benefit from the changes to the new fully formula feeding package. We recommend that the fully breastfeeding, partially breastfeeding and fully formula feeding woman's food package changes be implemented concurrently.
- We urge that the dollar amount for fruits and vegetables provided to the fully breastfeeding woman be increased to \$10, matching the IOM recommendation, for at least the first six months post partum. This would provide stronger incentive and support for breastfeeding in the period of time prior to the addition of complementary foods for fully breastfeeding infants at six months. If the USDA is unable to match the IOM recommendations for this group of women for this six month period, they should, at a minimum, allow States to act within the limits of their food funding to exceed the current maximum dollar amount for the fruits and vegetables vouchers for women within the first six months of breastfeeding.
- We would also suggest that States be given the option to provide the breastfeeding infant, in the first month, with 1) no formula, or 2) one can of powdered formula as recommended by the IOM. States would incorporate their option into their existing breastfeeding policies and procedures. An evaluation of the impact of these options on a mother's breastfeeding status will also allow USDA to determine an appropriate future course of action.
- State agencies will also require additional resources to provide enhanced breastfeeding support, peer counseling services and pumps to participants in order to ensure that WIC mothers feel comfortable foregoing formula within the first month and thereafter to help ensure breastfeeding success and optimal nutrition for their infants. WIC is the only national program that provides this level of breastfeeding education and support to the WIC population and must ensure that these changes to promote breastfeeding do not have the converse effect because mothers are afraid to give up all WIC formula benefits.

Fruits and Vegetables

The proposed rule provides for complementary infant food fruits and vegetables at six (6) months of age in varying amounts for those infants who are fully breastfeeding, partially breastfeeding or fully formula feeding as well as infant food meats for fully breastfeeding infants. Children and women participants will also benefit from the addition of fruits and vegetables through "cash-value" vouchers to purchase fresh and processed fruits and vegetables in the proposed amounts of \$8 for women and \$6 for children.

The food package recommendations support scientific research findings, which suggest that increasing fruits and vegetables is associated with reduced risk for obesity and chronic diseases such as cancer, stroke, cardiovascular disease, and type 2 diabetes. Fruits and vegetables added to the diet also promote adequate intake of priority nutrients such as Vitamins A, C, folate, potassium and fiber.

- In addition to the recommendation to increase the dollar amount of cash-value food instruments for fruits and vegetables to \$10 for fully breastfeeding women for a minimum of the first six months post partum, USDA should act to allow for full implementation of the IOM recommendation of \$10 cash-value instruments for all women and \$8 for children. To implement this recommendation while maintaining cost neutrality, States should have the option to:
 - Omit juice from the food packages for all children, a cost-saving measure that the medical and dental communities would fully support.
 - Reduce the amount of whole grains a child receives to one loaf of bread or one pound of a whole grain substitute to make the children's food package consistent with women's and still maintain current dietary guidelines.

Cutting corners with the fruit and vegetable cash-value instruments will lead to reduced health benefits for WIC mothers and children. WIC's success has been in saving long-term healthcare costs. Making this modest investment will assure healthcare savings in the future.

Soy Products

The proposed food packages offer calcium-set tofu as well as calcium- and vitamin D-rich soy beverages as partial substitutions and alternatives for milk. These alternatives will prove to be particularly beneficial to those WIC participants who suffer the medical consequences of milk protein allergy, lactose maldigestion, and those with cultural preferences.

- Currently, there are no calcium-fortified soy-based beverages on the market that meet the proposed protein and potassium standards. We urge FDA- and industry-standard levels of 6.25 grams of protein and 250 milligrams of potassium per 8 ounce serving as alternative minimum standards in order for the WIC food packages for women and children to be able to include soy.
- The **Massachusetts Nutrition Board** recommends that children be able to receive soy products without the requirement of medical documentation. The consumption of soy beverages and tofu for children can be a cultural/personal preference as well as a medical necessity. Since State policies and procedures for services and follow-up to medically diagnosed conditions will continue to be in place, this proposed rule will place an undue burden on the medical community and WIC service delivery systems and delay access to an important calcium source for WIC children.

Whole Grains

The proposed rule's establishment of a 51% whole grain requirement for breakfast cereals and inclusion of whole grain bread and other grains for all children and pregnant and breastfeeding women is consistent with the *2005 Dietary Guidelines for Americans* which recommend that refined grains be replaced with whole grains.

- The **Massachusetts Nutrition Board** recommends that USDA increase the allowable amount of whole grain bread from 16 ounces to one loaf up to 24 ounces, an amount consistent with the sizes available in stores.
- In order to accommodate the medical needs of certain participants, we support the IOM recommendation to allow States to make substitutions for "wheat-free" and "gluten-free" cereals based on a medical prescription and urge the Department to include such a provision in the final rule.

Vendor Regulations

- The **Massachusetts Nutrition Board** recommends that the USDA allow States to utilize existing Farmers' Market Nutrition Program vendor certification procedures for authorizing Farmers' Markets to participate in the WIC fruit and vegetable cash-value voucher program. The Board supports utilizing the existing FMNP structure and personnel for vendor authorization and compliance. Taking advantage of FMNP resources would greatly reduce the administrative burden on State WIC agencies and maximize the opportunities for small, local growers to participate in the WIC program. Without these changes, the proposed rule requirements would make the participation of farmers impossible to implement.

Voucher Redemption

- The **Massachusetts Nutrition Board** recommends that USDA give State agencies the discretion to determine the dollar denomination of the fruit and vegetable cash-value vouchers. It is essential that State agencies determine the dollar value of the cash-value vouchers in partnership with vendors to assure appropriate redemption levels and to save already tight Nutrition Services dollars. Printing of multiple vouchers in small, two-dollar denominations is costly and counter productive.
- USDA must give State agencies the flexibility to work with existing WIC vendors and the FMNP to develop and implement effective food instrument redemption procedures for fruits and vegetables cash-value vouchers that minimize administrative costs, processing errors, and are responsive to current WIC vendor and FMNP systems.

Categorical Tailoring and Substitution Requests

- The **Massachusetts Nutrition Board** is opposed to the removal of the State option to categorically tailor or propose food substitutions. There are rapid changes in food industry, science, demographics and other factors in today's environment, and State agencies may need to submit proposals for cultural accommodations or categorical

tailoring in the future. USDA's history of regulatory review and revisions to the WIC food packages substantiates the critical need for this flexibility. It is essential that States be allowed the ability to revise food lists to keep pace with the needs of their participants.

Implementation

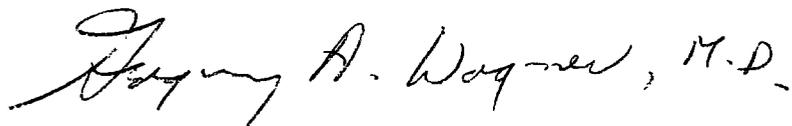
The **Massachusetts Nutrition Board** recognizes that implementing the proposed rule will require good planning and effective communication. There is great excitement and anticipation within Massachusetts regarding the promulgation of a final rule revising the WIC food packages. We are looking forward to full implementation the proposed rule in an expeditious manner. We recommend that USDA partner with State agencies and the National WIC Association to assure a reasonable and flexible implementation timeframe from the date of publication of the final rule.

In closing, as a member of the **Massachusetts Nutrition Board** and in support of the Board's positions, I enthusiastically and strongly support the proposed rule with the above noted recommendations. I am convinced that it will support participant choice and focus attention on chronic disease prevention and control. The proposed food packages will provide greater amounts of all of the priority nutrients currently identified as needed by the WIC population. They will supply a reliable and culturally acceptable source of supplemental nutritious foods as well as promote and support breastfeeding. Equally important, the proposals will provide WIC professionals with the necessary tools to reinforce the nutrition education messages and promote healthier food choices. In addition, the outlined recommendations will serve to reduce the administrative burden on States and local agencies and encourage the growth of Farmers' Markets.

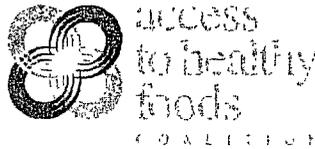
WIC is this nation's premier public health nutrition program. The long-term benefits of providing participants with fruits and vegetables, lower fat dairy products and whole grains, as well as additional incentives for fully breastfeeding women will greatly aid WIC in improving the life-long health of our most vulnerable women, infants and children.

I look forward to the full implementation the proposed rule and urge finalization of the rule by no later than the spring of 2007.

Sincerely,

A handwritten signature in black ink that reads "Gregory A. Wagner, M.D." The signature is written in a cursive style with a large initial 'G'.

NOV 04 2006



November 3, 2006

Patricia N. Daniels
Director, Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, VA 22302

PF-78

Docket ID Number: 0584-AD77-WIC Food Packages Rule

Dear Ms. Daniels:

I am writing on behalf of the Access To Healthy Foods Coalition to express our support for the proposed rule to change the Special Supplemental Nutrition Program for Women, Infants and Children food packages. The proposed changes will greatly benefit vulnerable mothers and children.

We are pleased that the proposed rule closely reflects the science-based recommendations of the Institute of Medicine published in their April 2005 report entitled, *WIC Food Packages: Time for a Change*. The changes reflected in the proposed rule are also consistent with the *2005 Dietary Guidelines for Americans* and national nutrition guidance including those from the American Academy of Pediatrics.

Unfortunately, the proposed rule places some restrictions on participant's choice and does not allow WIC recipients to use the voucher to purchase all fresh fruits and vegetables, including fresh white potatoes.

Additionally, the proposal reduces by \$2/month the cash-value of the fruit and vegetable voucher for mothers and children and provides State WIC agencies with the option of limiting choice within the fruit and vegetable category.

Access opposes these policy recommendations in the proposed rule and is asking USDA to reconsider them. We strongly believe that all fresh fruits and vegetables, as well as low fat milk and yoghurt, and multigrain products, should be eligible for the WIC voucher and that WIC participants should always be provided with maximum choice to meet their cultural and personal preferences.

Access To Healthy Foods Coalition, a 501(c)(3), is a group of businesses, industries, government agencies and non-profit organizations working together to positively influence health and nutrition in Washington state by improving access to healthy foods where we live, learn, work and play.

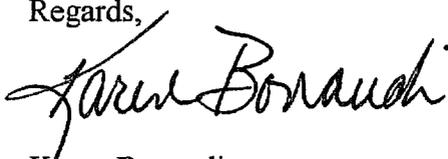
We believe that USDA should partner with State agencies and the National WIC Association to assure a reasonable and flexible implementation timeframe and to provide professionals with the necessary tools to reinforce the nutrition education messages and promote healthier food choices.

WIC is our nation's premier public health nutrition program, without which many of our most vulnerable women, infants and children would not have access to the building blocks of future health. The long-term benefits of providing participants with fruits and vegetables, lower fat dairy products and whole grains, as well as additional incentives for fully breastfeeding women will greatly support the health of the next generation.

Access supports the proposed rule with the amendments noted. We are convinced that it will serve to minimize vendor stock requirements, reduce the administrative burden on States and local agencies, encourage the growth of Farmers' Markets, support participant choice, and most important, focus attention on chronic disease prevention and control.

Thank you for your work on behalf of our national health.

Regards,



Karen Bonaudi

Chair

P.O. Box 745

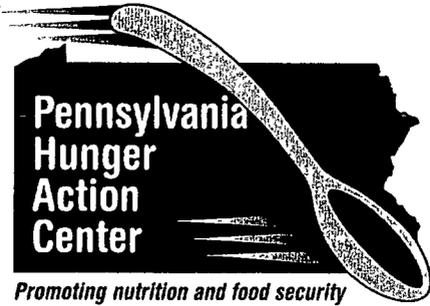
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NOV 01 2006

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November 1, 2006

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service – USDA
3101 Park Center Drive – Room 528
Alexandria VA 22302

PI-83

RE: Docket ID Number 0584-AD77
WIC Food Packages Rule

Dear Ms. Daniels:

On behalf of the Board of Directors of the Pennsylvania Hunger Action Center, I write in response to your invitation in the August 7, 2006 *Federal Register* to comment on the proposed rule affecting WIC food packages.

This organization works to promote nutrition and food security in the Commonwealth of Pennsylvania. Toward that end, we hold the WIC Program in very high regard and have worked over our entire 28-year history to promote consumer participation and administrative efficiency.

Previously, in a letter to you dated December 15, 2003, we asked the Food and Nutrition Service to redesign WIC food packages in a way that would

- retain the traditional "food prescription" approach;
- add a food package category for fruits and vegetables;
- limit milk to low-fat options (except for young children);
- authorize calcium-rich tofu, yogurt and soymilk as substitutes for milk;
- avoid a sharp reduction in the economic value of the children's food package; and
- within federal parameters, give states more flexibility to design food packages.

The rule you have proposed, if adopted, would be a significant step toward the achievement of these goals. Therefore, we heartily endorse the general direction of the proposed rule and urge final adoption on an expedited schedule.

WIC standards and practices impact half of all children born in the United States. This places the WIC Program in a highly strategic position vis-à-vis our national efforts to improve public health, maximize opportunity and bring medical costs under control. Indeed, it is not an exaggeration to suggest that WIC is America's foremost asset in the effort to impact dietary practices within low-income families.

AMERICAN OVERSIGHT

The WIC program has an exceptional opportunity to help form better eating habits for millions of Americans. WIC nutritionists spend a significant amount of time counseling and encouraging participants to increase consumption of nutrient-dense foods such as fruits, vegetables, whole grains, and low-fat dairy. However, it has been well-documented that low-income families have limited access to these products. By providing a more balanced package aligned with the *2005 Dietary Guidelines for Americans*, the proposed changes in the Food Package support WIC nutritionists' educational efforts to promote healthy lifestyles and prevent chronic disease.

Given all that is at stake, it is critical that the WIC Program reflect the latest research-based findings in regard to healthy nutrition. The proposed regulation does that. We urge FNS to remain resolute in following this path and to resist industry and/or marketing perspectives that would squander the rich potential of this Program and needlessly expose millions of Americans to heightened risk of overweight and chronic disease.

1. Fruits and Vegetables.

Fruits and vegetables have been shown to prevent and to help manage cardiovascular disease, stroke, type II diabetes, cancer, and also weight issues. Fruits and vegetables are sources of key nutrients lacking from the American diet, such as Vitamins A, C, folate, potassium and fiber. Thus, we strongly support the inclusion of whole fruits and vegetables into the proposed package; providing options for WIC families and vendors for fresh, canned, or frozen (and dried for women) fruits and vegetables is important to the success of this new component to the food package.

We affirm the decision of FNS to adopt cash value vouchers as the mechanism for providing this benefit. We also affirm the decision to avoid significant restriction on participant choice of fresh produce.

The proposed rule at section 246.12 establishes a minimum standard for fruit and vegetable vendors in regard to product variety and quantity. The minimum set (two of each) strikes us as too low; at least for here in Pennsylvania where excellent variety is available. In general, we encourage the setting of a standard high enough to affect the stocking patterns in corner stores but not so high as to push existing vendors out of the Program. As we understand it, this is a matter that can be addressed in each state based on local conditions. We support such an approach.

The role of seasonal fresh produce markets is not adequately addressed in the proposed rule. Many such vendors already participate in the WIC-Farmers' Market Nutrition Program. The rule should make clear that such vendors may also participate in the fruit-and-vegetable component of the regular WIC Program without stocking other food items.

The proposed mechanism for adjusting the value of the fruit and vegetable cash vouchers is not adequate. FNS has failed to provide a rationale for requiring whole dollar increments in the vouchers. Nor has it provided a rationale for an approach that will effectively erode the buying power of the fruit and vegetable vouchers each year (until, that is, they eventually are adjusted). As noted above, this part of the food package is so important that it should be adjusted annually. The mechanism proposed, on the other hand, may actually undermine public confidence in the FNS commitment to the fruit and vegetable initiative.

2. Milk Substitutes.

Alternative calcium sources such as soy beverage (soy milk) and tofu are necessary additions to the food packages to address milk protein allergy, lactose maldigestion, personal preferences, and cultural diversity of the WIC population. We support these substitutions as a way to provide more options for the diverse needs of the WIC population within the proposed food package. Because these products are significantly more expensive than milk, we support the requirement of a physician's prescription before WIC may authorize.

3. Whole Grains.

Whole grains are an important source of dietary fiber and other macro- and micro-nutrients. Dietary fiber is an effective tool for weight management. Whole grains have been shown to lower the risk of cardiovascular disease, type II diabetes, and some cancers. Thus, we support the whole grain requirement for cereals and the inclusion of other whole grain products in the proposed food package.

Several of the food packages limit whole grains to one pound per month. This will work well with raw grains but may create difficulty for the WIC participant who wants to buy bread and cannot find a one pound loaf. We request that this problem be addressed in the final rule.

4. Dairy Products.

The proposed changes to the WIC food packages would provide more appropriate amounts of milk and cheese to all women and children and bring quantities closer in line with the *Dietary Guidelines for Americans 2005*. The amount of milk offered in most food packages is close to or exceeds the daily milk intake recommendation. While the proposed food packages for pregnant/ partially breastfeeding and postpartum women provide slightly less than the recommended amount of milk, the amount of calcium offered in the food packages still exceeds the Adequate Intake (AI) for calcium.

One-half of WIC participants are children who receive Food Package IV. Milk is an important part of the value of that package and a strong inducement for parents to keep their children enrolled. In our view, maintaining WIC participation until a child's fifth birthday should be a very high priority as part of forming eating patterns that support long-term health. Thus, we caution against any further reduction in the dairy allowance in the children's package.

5. Juice.

The proposed rule eliminates juice from the infant food package and decreases the total quantity offered to children and women. Omission of juice from the infant food package helps make possible the addition of baby food fruits and vegetables. Providing appropriate quantities of juice in the proposed children and women food packages would allow for the inclusion of whole fruits and vegetables while containing food costs. The quantities of juice proposed for children align with current recommendations for juice consumption. These are changes we support.

6. State Administration.

In general, we support regulatory flexibility that enables states to partner with vendors to maximize value and product quality. This is not an entitlement program and in order to serve all eligible individuals, the states must have the flexibility to make the dollars stretch. This concern with efficiency must be balanced with science-based standards and WIC's traditional emphasis on customer satisfaction. Thus, we affirm your proposal to prohibit categorical tailoring. And along with a significant measure of state flexibility, we recommend that FNS require state agencies to establish and support Food Package Advisory Councils to help make the many decisions yet ahead. These councils should include WIC participants and representatives of organizations working to improve the health and well-being of WIC-eligible individuals.

Thank you for this opportunity to offer these comments and recommendations.

Very truly yours,



Berry Friesen
Executive Director

NOV 06 2006

The Kentucky Task Force on Hunger
P.O. Box 22199
Lexington, Kentucky 40522-2199
Phone: 859.266.2521

November 3, 2006

PT-84

Patricia N. Daniels
WIC Director, FNS/USDA
3101 Park Center Drive, Room 528
Alexandria, VA 22302
RE: Docket ID Number 0584-AD77

Dear Ms. Daniels:

On behalf of the Kentucky Task Force on Hunger, I am writing to support USDA's proposed new WIC food packages rule because it will improve the health and nutritional quality of the foods offered, expand cultural food options, and increase choices for the women, infants and children in the WIC program.

Since the foods offered in WIC were last revised, there has been an explosion of knowledge related to nutrition and health, as well as a growing obesity problem in this country. The proposed new WIC food packages will strengthen WIC's positive role in helping mothers and children maintain a healthy weight and allowing them to make healthy food choices.

We commend USDA for updating the WIC food packages to reflect the Dietary Guidelines and current nutritional science by adding fruits, vegetables, whole grain bread, corn tortillas and the option of soymilk and tofu, and moving to low-fat milk and whole grain cereals.

We support USDA for building in protections safeguarding the nutritional value of the new food packages for all participants by strictly prohibiting state level cuts to the new food packages.

To ensure that WIC participants can get the full value from the healthy new WIC food packages, we offer the following recommendations to strengthen the proposed rule:

****Increase the fruit and vegetable benefit by \$2.00 to fully meet the recommendations of the Institute of Medicine for women and children in WIC.**

****Allow WIC participants to choose the kinds of fruits and vegetables they want.**

****Allow WIC participants to choose healthy and culturally appropriate cereal by revising the proposed cereal standard to include whole grain corn-based (i.e. corn flakes), rice (i.e. puffed rice) and bran (i.e. bran flakes) WIC cereals.**

****Remove the requirement for children to have a prescription to obtain soy milk from WIC.**

****Maximize access to Farmers' Markets and the WIC Farmers' Market Nutrition Program for local seasonal fruits and vegetables.**

****Establish WIC state advisory councils of stakeholders to help support and inform the planning and implementation of the new food package.**

We want to thank you for the opportunity to share our support for the healthy WIC food packages and our recommendations to make them even stronger. We look forward to the USDA moving quickly to issue these new food packages.

Sincerely,


Anne Joseph
Director

NOV - 6 2006



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November 3, 2006

Ms. Patricia N. Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Services
U.S. Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, Virginia 22302

PI-86

**RE: Comments on WIC Food Packages Proposed Rule,
Docket ID Number 0584-AD77.**

Dear Ms. Daniels:

California Food Policy Advocates appreciates this opportunity to convey its strong support for the proposed changes to the WIC food package. CFPA is a statewide nutrition policy and advocacy organization focused on strengthening and expanding the federal nutrition programs as the best resource available to prevent both hunger and obesity. CFPA's mission is to improve the health and well-being of low-income Californians by increasing their access to nutritious, affordable food. Since 1992, CFPA has worked to address the changing nutritional problems facing low-income Californians. In these fifteen years, overweight and obesity have dramatically eclipsed food insecurity as the most prominent nutritional deficiencies facing poor Californians, necessitating updates and revisions in the safety net programs, such as school meals, food stamps and WIC.

CFPA is pleased to support enthusiastically these long-awaited improvements. We commend the Department for proposing important changes to WIC that are consistent with the *2005 Dietary Guidelines for Americans* and align with the American Academy of Pediatrics infant feeding recommendations. We urge their speedy approval and adoption: once implemented, they will greatly strengthen the WIC program's ability to improve the nutrition and health status of millions of families.

1. Fruits and Vegetables. CFPA strongly supports providing 8.2 million WIC mothers and young children with cash-value vouchers to purchase fruits and vegetables, as recommended by the Institute of Medicine's (IOM) Report: "WIC Food Packages: Time for a Change." While the IOM recommended \$10/ and \$8/ month vouchers, the proposed rule reduced this amount to \$8/ and

\$6/month in order to achieve overall cost neutrality. We urge USDA to work with Congress to secure increased federal funding soon to bring the cash value of these fruit and vegetable vouchers up to the IOM-recommended levels, and to keep pace with inflation. This will better assist WIC families to purchase and consume fruits or vegetables each day. **However, the proposed voucher levels are an excellent start and should be immediately implemented.**

2. Other Changes To Improve Dietary Intake. CFPA supports the proposals to reduce the amount of certain foods (milk, cheese, eggs, and juice) in order to better align WIC with current Dietary Guidelines and recommendations from the American Academy of Pediatrics. In particular:

- The proposal will provide stronger incentives for continued breastfeeding by providing less formula to partially breastfed infants and providing additional quantities/types of food for breastfeeding mothers. To further enhance the food package for fully breastfeeding women, we urge USDA to **raise the cash-value vouchers for fruits and vegetables to the original IOM-recommended amount of \$10 per month.**
- The proposal to **reduce juice and replace it with infant food at 6 months** will support recommendations by the American Academy of Pediatrics for introducing infants to fruits and vegetables at the appropriate age.
- The provision of **whole grain and soy options** will allow WIC to better serve California extremely diverse young families.
- The inclusion of **lower-fat milk and less cheese and eggs** supports adequate calcium intake, while at the same time lowering saturating fats and cholesterol in accordance with current dietary guidance.

These proposed changes will both reinforce WIC nutrition education messages and address the cultural food preferences of California's diverse population.

We look forward to working with USDA and the WIC program to implement these excellent food package improvements over the next few years. These changes will be a major policy lever to improve community food security, address the obesity epidemic, and help low-income families make healthier food choices. Taken together, this regulatory proposal will ultimately have a positive impact on the health of women, infants and children in California. Please call me with any questions at 415.777.4422x102.

Sincerely,



Kenneth Hecht
Executive Director

Date: 10/16/2006

87

Dear Friends at US Department of Agriculture,

I am writing to tell you what I think about the proposal to change WIC foods.

What I like most about the proposed changes is the Fruit and vegetable additions.What I like least about the proposed changes isthe reduction in egg amounts and no change in types of dairy available (i.e. growth hormone + conventional milk).
Thank you for reading my comments.

Sincerely,


JUAN REARDON

Name: JUAN REARDON

Title: COORDINATOR

Organization:

5 a Day - Power Play! - Central Coast

NOV 03 2006

Date: 10/16/06

PI
88

Dear Friends at US Department of Agriculture,

I am writing to tell you what I think about the proposal to change WIC foods.

What I like most about the proposed changes is

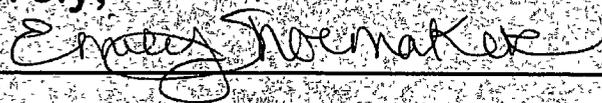
- increased produce
- Decrease juice
- adding tofu, soy products, & brown rice

What I like least about the proposed changes is

I think the proposed changes as a whole would make a positive difference in the foods available through WIC

Thank you for reading my comments.

Sincerely,



Name: Emily Shoemaker

Title: Development Associate

Organization: Second Harvest Food Bank

of Santa Cruz & San Benito Counties

NOV 03 2008

~~060~~
PI
89

Date:

Dear Friends at US Department of Agriculture,

I am writing to tell you what I think about the proposal to change WIC foods.

What I like most about the proposed changes is

increase in benefits. All families need fruit + vegetables

What I like least about the proposed changes is

Thank you for reading my comments.

Sincerely, *Maria L. Garcia*

Name: *MARIA L. GARCIA*

Title:

Organization: *APTOS PANTRY
HOT LINE - SAN CRUZ COUNTY*

Date: 10/16/04

PI
90

Dear Friends at US Department of Agriculture,

I am writing to tell you what I think about the proposal to change WIC foods.

What I like most about the proposed changes is

The allowance of fruits and vegetables as well as soy products.

What I like least about the proposed changes is

The allowance for high-fat cheese, which also does not include culturally appropriate cheeses (i.e. queso fresco cheese)

Thank you for reading my comments.

Sincerely,



Name: Gabriela Lopez Chavez

Title: Latino 5 a Day Campaign Coordinator

Organization: La Manzana Community Resources