

LA-1

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

Sent: Tuesday, August 08, 2006 2:57 PM

To: WICHQ-SFPD

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

Working at WIC for a few years now as I nutritionist, I look forward to change. Our government looks foolish not changing food packages for 30 years..where as our cultures and weight (obesity) has dramatically changed in the USA.

Allowing more cultural foods (including whole grains) as well as alternatives to cows milk(soy milk) is imperative. Access to fruits and veggies (not just at Farmers Market) can help dietitians and nutritionist truly promote 5 - 9 servings/day. By providing less formula and continuing to promote breastfeeding and healthy foods, WIC can turn some of its image as " a place where you can get formula for your baby" to a "nutrition office where you can receive healthy food and valuable nutrition education for your young family".

Sincerely,

Cambridge/Somerville WIC Program
Massachusetts

LA-2

Sent: Wednesday, August 09, 2006 7:44 AM

To: WICHQ-SFPD

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

To Whom It May Concern:

As a RD and IBCLC with 5 years experience in the WIC Program (in Atlanta and Kansas City), I think the proposed changes for food packages are excellent and I give my support! I especially like eliminating juice for infants while giving jarred fruits and providing fresh fruit and vegetables.

Thank you!

LA-3

From: WebMaster@fns.usda.gov
Sent: Thursday, August 10, 2006 11:40 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Durango
STATE: CO
ORGANIZATION: WIC
CATEGORY: LocalAgency
OtherCategory:
Date: August 10, 2006
Time: 11:39:57 PM

COMMENTS:

Would like to see yogurt included in the package as many clients who can't drink milk, do tolerate and like yogurt.

LA-4

From: WebMaster@fns.usda.gov
Sent: Monday, August 14, 2006 4:49 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: sioux falls
STATE: SD
ORGANIZATION: SD Department of Health-WIC
CATEGORY: LocalAgency
OtherCategory:
Date: August 14, 2006
Time: 04:49:24 PM

COMMENTS:

This rule would be excellent. Fruit and vegetables are the most highly deficient food group for my clients. Many say finances affect their ability to purchase these foods and they are the last foods that get purchased as they feel they are not the bulk of their diet. Money is spent on the main dishes and only if they have money remaining do they purchase these foods.

LA-5

From: WebMaster@fns.usda.gov
Sent: Tuesday, August 15, 2006 3:04 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Olympia
STATE: Wa
ORGANIZATION: Community Action Council WIC
CATEGORY: LocalAgency
OtherCategory:
Date: August 15, 2006
Time: 03:03:40 PM

COMMENTS:

Allowing fruit and vegetables in the food pkgs is a great asset. My recommendation is not to allow any formula until 6mo of age(unless with documentation from MD). We need to promote exc BF'ing for 1st 6 months. When people think of WIC, they think of formula.

LA-6

Sent: Tuesday, August 15, 2006 3:20 PM

To: WICHQ-SFPD

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

I think the proposed changes are wonderful!

Having 5 years experience in the WIC program caregivers are always asking about getting baby foods and vegetables and fruits. I am glad to see there will be more variety with calcium products, such as soy milk. Most participants did not use all the milk previously issued so there should not be a big decrease in the amount of milk purchased through the WIC program.

I like the additional benefits being given to breastfed babies, it will help us to further promote breastfeeding among the WIC population.

As a professional working in WIC clinics, I look forward to the day I can begin providing these recommended foods to WIC participants!

Chester County WIC Program
West Chester, PA 19380

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LA-7

From: WebMaster@fns.usda.gov
Sent: Wednesday, August 16, 2006 12:41 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Minnetonka
STATE: MN
ORGANIZATION: Bloomington Public Health WIC Progam, Bloomington, MN
CATEGORY: LocalAgency
OtherCategory:
Date: August 16, 2006
Time: 12:40:34 PM

COMMENTS:

I think adding fruits and vegetables for participants over 6 months old is long overdue. Our participants really love the Dept. of Agriculture's Farmer's Market vouchers, so I do think they would use the fruits and veg on the vouchers too. I also agree that whole grain foods would be good, besides the cereals already available...are they suggesting breads or whole grain rice or other grains too? I am questioning the addition of infant food meats as early as 6 month of age however, as we normally recommend meats at around 8-10 months of age. Thank you for the opportunity to comment on these rule changes.

LA-8

Sent: Monday, August 21, 2006 3:26 PM

To: WICHQ-SFPD

Subject: WIC Food Package Changes

Finally, a food package to back up the message nutritionists are trying to convey to clients in our counseling sessions, classes and education materials.

I specifically applaud the decrease in juice and milk as well as the addition of fruits and vegetables. Clients have been asking us why WIC doesn't offer these foods for years. I kept saying, "One of these days we will." I also like the addition of soy products for clients who are allergic to milk products.

Thank you!

Lawrence-Douglas County Health Dept

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LA-9

Sent: Tuesday, August 22, 2006 3:19 PM

To: WICHQ-SFPD

Subject: Docket ID 0584-AD77, WIC food package rule

I would like to comment on the WIC food package rule. I am in favor of the new food package rules, with the exception of the reduced formula amounts and the variation in the amount of formula each month for non breast fed infants.

Many families rely on WIC as a supplemental program to assist with infant formula. While I prefer that infants are breastfed and not use formula at all, I know that many will use formula. Families contact our agency on a regular basis because they have run out of the WIC provided infant formula. I have concerns that decreasing the amount of formula that the infants get will negatively impact our clients and that many families will substitute formula with whole milk, which is detrimental to infants. I feel that the amount of formula given by the program should not be decreased with the food package changes.

I also feel that there should not be a limit on the amount of supplemental formula that a partially breastfed infant receives. I feel that the professionals working with the clients should assess the need and negotiate that amount with the parent. Partially breastfeeding clients sometimes need more than 4 cans a month to continue to breastfeed, and meet the infant's needs. I don't feel that limiting the amount they can get promotes breastfeeding, but promotes changing to full formula feeding so they can get the amount of formula they need. I strongly feel that any amount of breastfeeding is beneficial to the infant, and there should be no barriers to Mothers continuing to breastfeed, even if that is not the sole source of infant nutrition.

Sincerely,

Jefferson County Public Health
Madras, OR 97741

LA-10

Sent: Monday, August 28, 2006 11:57 AM

To: WICHQ-SFPD

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

The changes being proposed will address the diversity of the clientele we serve. The additions are more in line with the food pyramid and will help reinforce better food choices and ultimately better nutrition. I also like to reduction of animal fat and the availability of soy products. This is a long needed change that will support healthy eating in children and adults and will encourage life long healthy choices.

Multnomah County East - Primary Care, WIC, Dental and Eastside Teen Clinic
Rockwood Neighborhood Health Clinic
Gresham, OR 97030

LA-11

Sent: Monday, August 28, 2006 5:53 PM

To: WICHQ-SFPD

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

To whom it may concern,

I am writing in regards to the recent decision to update the WIC food packages. As a WIC dietitian, I applaud this decision and look forward to the changes to come down the road. The 2005 Dietary Guidelines and Healthy People 2010 have given us reputable research to lead us to optimal health and excellent goals to achieve as a nation. I believe the WIC program has an important role in educating the WIC population about these goals and objectives. It has been documented repeatedly that lower income families often rely on less healthy foods, leading to increased/excessive Calorie intakes, due to a lack of financial security. This research by no means leads me to believe WIC families purchase these foods due to preference over healthier options, but rather because they are available in larger quantities at a lower price. By offering healthier options, including whole grains, fruits and vegetables, WIC participants will be able to obtain healthier foods, allowing for a greater chance of meeting the 2005 Dietary Guidelines and Healthy People 2010 goals. The Dietary Guidelines and Healthy People reports were by no means meant to address only United States citizens who could afford to follow the objectives, but for the population as a whole. The WIC program is taking a step in the right direction to help WIC participants adhere to these goals and objectives. Again, I look forward to the changes in the future and hope that we can continue to offer the WIC population outstanding nutritional services.

Thank you,

Medina and Wayne County Ohio WIC Dietitian

Check out AOL.com today. Breaking news, video search, pictures, email and IM. All on demand. Always Free.

LA-12

Sent: Tuesday, August 29, 2006 3:06 PM

To: WICHQ-SFPD

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

Dear Decision Makers,

I'm a nutritionist at the Provo, UT WIC Clinic. I strongly endorse the change to the food packages to include fruits and vegetables. Also, I think that there is no financial incentive for a mother to breastfeed. A pkg. of carrots and tuna isn't enough! If mothers are willing to exclusively breastfeed they should get up to \$100/ month to spend on fruits and veggies, whole grain breads, etc. That is the minimum monthly cost of formula! Thank you for revising the packages as this is a well needed change!

Sincerely,

LA-13

From: WebMaster@fns.usda.gov
Sent: Tuesday, August 29, 2006 3:07 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Wilson
STATE: Ks.
ORGANIZATION:
CATEGORY: LocalAgency
OtherCategory:
Date: August 29, 2006
Time: 03:06:58 PM

COMMENTS:

- *Concerning the offering of fresh fruit & veggies I would like to know how the vendors will be monitored so there will be quality control of the fresh items. At least with processed items the quality is controlled.
- *Offering jars of baby food still does not teach the adult feeding the child how to prepare baby food or cook. It is time for required cooking classes for the adults responsible for the WIC checks.
- *There is a need for the mentioned alternatives to milk.
- *There is also a need for canned beans, legumes, and additional choices of fish.
- *Offering whole wheat grain products will be beneficial.
- *Reducing the amount of infant formula will wake the adult caregivers up and make them realize they are responsible for feeding this child and not relying on the government system so much.
- *There is no need to reduce the eggs This is food item they do know how to cook. Reducing the milk amount is appropriate if cheese remains as a WIC food itme.
- *There is no reason to totally eliminate juice. This needs to be calculated in as part but not all of the fruits & veggies.
- *There should not be a concern with eliminating whole milk for age 2 and older. This elimination will help with teaching adults how to feed their children.
- **As hard and as much time that is needed to make up food packages all of the energy and time will be wasted if the adults responsible for the food do not know how to cook. Cooking classes once every 6 ms. should be required for the adult responsible for the food for infants and children between 6 months and 5 years of age. If the adult does not attend the class then reduction in the food package(s) they are responsible for is needed. Attending the class should be defined as the adult participant is present for a cooking class presented by a human--not an interactive notebook or display, or watching a video. Until the adult is inconvenienced and required to step up to the plate and be responsible for the



nutrition of the infant and children there will be minimal change needed by the government to give more variety to the food packages or improve the nutrient levels of the packages.



LA-14

REP 7

From:
To: wichq-sfpd@fns.usda.gov
Subject: Docket ID Number 0584-AD77, WIC Food Pacaes Rules

Dear FNS-USDA,
We are excited about the New Proposed Food Package. The IOM made excellent recommendations. Below are the comments from the:
Graham County Health Dept. WIC Program, Safford, AZ 85546 and
Greenlee County Health Dept. WIC Program, Clifton, AZ 85533.

- 1) Thank you for the soy milk, tofu, whole grains, fruits and vegetables.
- 2) Based on comments from WIC clients in both counties we recommend Pg, Bfing women and children of all ages be offered peanut butter and/or canned or dried beans. Many of our clients don't prepare food due to various circumstances. A peanut butter sandwich is a more realistic dinner for many families vs. a home cooked meal. We realize the risk of choking on peanut butter exist in young children but feel inadequate or missing meals is more of a problem.
- 3) We would like to request Brown Rice Bread be an option to whole grain bread for our clients who have wheat and gluten intolerance. Easier to eat a sandwich then cooked up rice or other gluten free grain.
- 4)Also for clients with gluten intolerance rice and other whole grain non gluten cereals i.e. millett that are not manufactured in a facility that also manufactures wheat products i.e. Rice Chex would not qualify.
- 5) For lactose maldigestion we would request a 0% lactose cheese be added i.e. Cabot cheese for those people who can't tolerate even small amounts of lactose in cheese.

was unable to send the email. mailed instead *Redy*

LA-15

From: WebMaster@fns.usda.gov
Sent: Thursday, September 07, 2006 12:54 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Long Beach
STATE: CA
ORGANIZATION: PHFE WIC
CATEGORY: LocalAgency
OtherCategory:
Date: September 07, 2006
Time: 12:54:15 PM

COMMENTS:

I am in favor of the revisions to the food package. Everyday I encourage our participants to eat a balanced diet and I think they would be more likely to adhere if the foods they needed were provided for them. Adding whole grains to the food package is the perfect idea because it will eliminate the option of buying less nutritious "white" bread. It has been my experience that people who would not typically choose a whole grain product will be more likely to try it and stick with it if they are receiving it for free. I also feel that the addition of fruits and vegetables is essential. Fruits and vegetables are the core of a healthy, balance diet. They can also be one of the more expensive items to purchase. Unfortunately refined carbohydrate snacks are not. With the unnecessary rise in childhood obesity rates, which are especially prevalent in lower income families, it is vital that WIC take a stand and provide it's families with nutritious snacks. In doing this WIC will not only play a role in the battle against childhood obesity, but they will also provide children with healthy eating habits right from birth which will in turn lead them to live a healthier adulthood. Additionally I feel that by including baby food to the WIC Food Package that we will see a higher trend of children that stick with the program past their first birthday. By ensuring that mothers keep their children in the program beyond 12 months of age we will be able to provide those children with a basic knowledge of nutrition that will lead them to be healthier adults and in turn lower the rates of many preventable diseases.

In conclusion it can safely be said that through the revision of the WIC Food Package we will not only be producing healthier children, but creating healthier adults as well.
Thank you,

LA-16

Sent: Thursday, September 07, 2006 2:13 PM

To: WICHQ-SFPD

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

Attachments: Comments on WIC food package.doc

Comments are attached

Pinal County Division of Public Health

**Comments from Pinal County Division of Public Health WIC Program
on the Revisions in the WIC Food Package; Proposed Rule, Docket ID
Number 0584-AD77, WIC Food Packages Rule**

Comments on the Recommended Food Package:

We applaud the food package changes especially getting fruits and vegetables, adding canned beans, and whole grain options. Tofu is a great addition as is infant fruit, vegetables, and meat. We feel our WIC participants will like the changes.

**Comments relate to Rounding Up Infant Formula Methodology and
Infant Foods Methodology:**

This section was extremely difficult to read and understand. It would appear that the state office would need to set up many standard calculations for the Community Nutrition Worker to follow. The individual staff worker would not be able to round up the infant formula as it would be too time consuming and confusing.

In our experience the infant formula companies change infant formulations and can sizes quite frequently. This will cause extra work every time can sizes are changed.

A standard plan would need to be devised. WIC participants would not understand getting 2 boxes of cereal one month and one box of cereal the next month due to rounding up. Participants also would not understand why their neighbor got 3 boxes and they got 1. There would be accusations of discrimination and this would put the WIC staff worker in a precarious position.

Clients stop breastfeeding when they want to and when it is convenient for them not for WIC. This would cause more confusion with rounding up if and when they switch over to infant formula.

**Pinal County Division of Public Health
Florence, Az 85232**

LA-17

Sent: Friday, September 08, 2006 3:43 PM
To: WICHQ-WEB
Subject: Proposed WIC Food Package Changes

Re the proposed food package changes as reported in the Federal Register, Aug. 7...I agree wholeheartedly with the proposed additions of fruits & vegetables. As a WIC nutritionist, I have had difficulty providing nutrition education regarding limiting juice intake to 4-6 oz per AAP's recommendation, when our own food packages appear to provide juice liberally. I believe this change is long overdue!!!

Southwest Georgia Health District 8/2
Albany, GA 31701

LA-18

Sent: Tuesday, September 12, 2006 8:55 AM

To: WICHQ-SFPD

Subject: Docket ID Number 0584-AD77, WIC Food package rule

Ladies, Gentlemen:

I am in full support of adding fruits and vegetables to WIC packages. All participants of WIC program I counsel here at the South End Community Health Center in Boston, MA are on fixed budgets, and produce is often seen as a luxury, not a daily necessity. The end of each monthly food order is totally deficient in fresh produce, and often in canned or frozen as well. Placing fruits and vegetables on the WIC food packages would serve as a great healthy eating model for those pregnant women, breastfeeding women, and families with young children.

I promote 5 a day, or even 9 a day, when counseling my English and Spanish speaking families here at SECHC. Adding produce to the WIC food packages would help achieve this goal.

Thank you so much,

Sincerely,

South End Community Health Center
Boston, MA. 02118

LA-19

From: WebMaster@fns.usda.gov
Sent: Tuesday, September 12, 2006 3:59 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Aurora
STATE: CO
ORGANIZATION: Tri-County Health Department
CATEGORY: LocalAgency
OtherCategory:
Date: September 12, 2006
Time: 03:59:01 PM

COMMENTS:

1. Clients will be happy to have some baby food on WIC checks, that would encourage solid feeding versus offering more and more formula.
2. Good idea is not to offer partially breastfed mother formula the first month – lots of women quit after first few weeks because milk decrease due to formula before milk supply is established.
3. Infants after 6 months do not need all 9 can of formula. 7 cans should work.
4. I am not sure if time to increase formula should be 4 months – I have a few 3 month old infants on my caseload that definitely would use 10 cans of formula – that’s why moms sometimes start solids at 3 months because of non stop eating.
5. Should we just do 10 cans for 3-4 month olds (instead 4-5m) and start offering cereal at 5 months instead of 6 months?
6. I can assure you, soy milk on WIC packages will make lots of clients happy.
7. I would not reduce eggs from 2dz to 1dz – most of our clients cannot afford better sources of protein (e.g. meat) and I think they definitely use eggs.
8. Fruits and vegetable (both frozen and fresh) are a wonderful option, I am just not sure how that would not bring confusion to the clients and store clerks.
9. Some other choices in substitution to cereal would be welcome – lots of my clients mention that they have a lot of cereal at home (not every single morning kids eat cereal).
10. Lots of clients love canned beans and they would prefer those instead of dry beans that need more than few hours to cook and do not taste so well (with the exception with Hispanic clients who use dry beans without second thought). Are we still leaving canned milk? Lots of clients from African countries grew up without fresh milk and they claim their stomachs cannot handle anything else besides milk in a can.

LA-20

Sent: Wednesday, September 13, 2006 12:55 PM
To: WICHQ-SFPD
Subject: FW: Docket 0584-AD77, WIC Food Package Rule

Sent: Wednesday, September 13, 2006 9:50 AM
To: 'wichg-sfpd@fns.usda.gov'
Subject: Docket 0584-AD77, WIC Food Package Rule

Hello USDA!

I am a Dietitian that has worked for WIC for over 20 years. I have heard time and time again from families that want soy milk instead of cows milk, so the proposed changes will keep these families from dropping off of the program.

Families also ask for baby foods for their babies, and fruits/veggies for their kids. These changes are SO POSITIVE and wonderful. I endorse them and welcome the change. I also feel the addition of whole grains and yogurt is a very smart move. Many of our diverse ethnic groups would prefer rice or tortillas to the cereal. Once again - it will keep these families coming in if they receive the appropriate foods that are nutritionally sound.

Plus - I won't have the local Pediatricians complaining about WIC causing the obesity epidemic! Thanks for the changes! Please implement them as soon as possible!

Sincerely,
Butte County WIC

LA-21

From: WebMaster@fns.usda.gov
Sent: Wednesday, August 09, 2006 12:28 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Crandon
STATE: WI
ORGANIZATION: Forest County Potawatomi Health & Wellness Center
CATEGORY: LA
OtherCategory:
Date: August 09, 2006
Time: 12:27:50 PM

COMMENTS:

As a Dietitian working with the WIC program I am excited to see changes may be made to the food packages. With today's epidemic of childhood overweight and obesity intake of fruits and vegetables is even more important. The inclusion of fruits and vegetables would better support the nutrition education I provide to my clients on the benefits of these foods. Please support this change.

LA-22

From: WebMaster@fns.usda.gov
Sent: Wednesday, August 09, 2006 12:51 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: crandon
STATE: wi
ORGANIZATION: health education
CATEGORY: LA
OtherCategory:
Date: August 09, 2006
Time: 12:51:02 PM

COMMENTS:

The idea of supporting and/or encouraging breast feeding is excellent. Just don't mother's who choose to bottle feed feel less than.

LA-23

From: WebMaster@fns.usda.gov
Sent: Tuesday, August 29, 2006 6:44 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Santa Rosa
STATE: CA
ORGANIZATION: Sonoma County Indian Health Project -- WIC
CATEGORY: LA
OtherCategory:
Date: August 29, 2006
Time: 06:43:33 PM

COMMENTS:

A vast and greatly needed improvement upon an otherwise successful nutrition program.
The proposed changes will help change the way Americans eat. Let's get moving!

LA-24

From:
Sent: Monday, September 11, 2006 12:32 PM
To: Whitford, Debbie
Subject: WIC Food Packages

September 11, 2006

Debra Whitford, Chief, Policy and Program Development Branch
Supplemental Food Programs Division
Food and Nutrition Service
USDA
3101 Park Center Drive, Room 528
Alexandria, VA 22302

Dear Ms. Whitford,

I write to commend you and the others who have been working hard on the research and proposals regarding the changes in the WIC food packages.

I worked for the WIC Program in Baltimore County, MD in 1995 and now for three years at the SCCAP WIC Program in Adams County, PA. As a registered dietitian, I studied many things regarding human nutrition, and work to continue to update my own understandings of a wholistic approach to nutrition. Lately I have found it hard to reconcile what I understand as important nutritional principles on issues such as the superiority of non-chemically produced whole grains and fresh fruits and vegetables and of grass-fed animal products, as well as mother's milk as the standard food for human infants with issuing vouchers for infant formulas, fruit juices, processed cereals and grain-fed-and-confined-animal produced dairy products and eggs.

I have looked over parts of the National Academies' Institute of Medicine report, "WIC Food Packages: Time for a Change" and am very impressed with the research and issues discussed there. I recognize that there are many factors that need to be taken into account, such as expense and participants' food-purchasing/use habits, but given the fact that WIC is a Nutrition Education program, I think we need to be bold in respect to challenging participants to truly make the changes that the latest research tells us is healthy. For example, fruit juices are such concentrated sources of sugar and are so over-consumed that it would be more appropriate for 100% of the previous allocation for the highly processed (and expensive) fruit juices to be replaced with the dollar vouchers for fresh fruits and vegetables. There should be the allowance to use the fruit and vegetable dollars for organically produced items, and our education should highlight the benefits of locally produced items whenever available. Additionally, I would suggest that there be an opportunity for WIC participants to be taught about -- and have the WIC vouchers reflect -- the nutritional and health benefits of animal products produced by cows,

chickens and other animals eating grass and having free range, as compared to those who are confined and provided an unnatural diet of only grain. I'm not sold on the label of "organic" as answering all of these concerns, but in many cases it at least reflects that less harmful substances have been involved in the production of a given food, and the practices in its production are more earth-friendly than conventionally produced foods. In respect to the heavy use of infant formulas, I think that the proposed additions to the exclusively breastfed infant's food package are one good step, as well as the reduction in amount of cans of supplemental formula for "partially breastfed" infants. I know that for infants not receiving all milk as mother's milk, there is the danger of less-appropriate things than infant formula being offered, but I would encourage that research be done regarding the potential to increase the amount of truly exclusively breastfed babies by the WIC Program's not offering a partial-formula option.

Thanks again for all of your work and for your consideration of the above suggestions as ways to take the opportunity of change to even more fully reflect current nutritional ideals. I welcome any questions or feedback.

Sincerely,
WIC Program
South Central Community Action Program
Gettysburg, PA 17325

LA-25

From:
Sent: Friday, September 15, 2006 3:52 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

This note is to convey support for the proposed new WIC package guidelines.

Thank you.

El Dorado County Department of Human Services
Placerville, CA 95667

LA-26

From: WebMaster@fns.usda.gov
Sent: Tuesday, September 19, 2006 10:46 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Tyler
STATE: Texas
ORGANIZATION: WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: September 19, 2006
Time: 10:46:09 AM

COMMENTS:

It is time for a change. Please approve the proposed new WIC food package. I have been a proud member of the WIC workforce for 12 years. As a Registered Dietitian, I support the changes. the addition of fruits, vegetables and whole grains will support our teaching of the New Pyramid. The reduced amount of milk, egg,s cheese, and juice will support our current recommendations and all teachings of proper nutrition. Low fat milk for older children and adults will help conquer the obesity epidemic. Replacing juice with infant food fruits and vegetables will help our WIC families provide a more rounded diet for their babies. By providing less formula and stronger incentives to our breastfeeding mothers, we may be able to meet the help people objectives of 2010.

LA-27

Sent: Tuesday, September 19, 2006 4:43 PM
To: WICHQ-SFPD
Subject: New WIC Food Packages

It is time for a change! Please approve the proposed new WIC food package. I have been a proud member of the WIC workforce for 5 years. As a Clerk III, WCS, I support the changes to the food package. The addition of fruits, vegetables, and whole grains will support our teaching of the new Pyramid. The reduced amount of milk, eggs, cheese, and juice will support our current nutrition recommendations for children. Low fat milk for older children and adults will help conquer the obesity epidemic. Replacing juice with infant fruits and vegetables will help our WIC families provide a more rounded diet for their babies. By providing less formula and stronger incentives to our breastfeeding mothers, our breastfeeding rates will increase and babies will be healthier.

The time for change is NOW and I urge a speedy implementation of the proposal. These changes will truly provide us with the tools we need to improve access to nutritious, affordable food in low-income communities.

Thank you,

Sulphur Springs WIC Program
Sulphur Springs, Texas 75482

LA-28

Sent: Thursday, September 21, 2006 4:23 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: San Diego
STATE: California
ORGANIZATION: American Red Cross WIC
CATEGORY: Other
OtherCategory: RD at local WIC agency
Date: September 21, 2006
Time: 04:23:14 PM

COMMENTS:

I would encourage writing in "enriched" for soy milk vouchers, so the calcium remains comparable to milk. Also-what about giving participants a choice for baby food- either jarred fruits/veg OR adding in more money for fresh fruit/veg (equivalent dollar value)- as a way to promote a more nutrient rich choice for their children. Otherwise it may look as if we promote jarred baby food over using fresh. Thanks for letting us share our voice!

LA- 29

Sent: Thursday, September 21, 2006 6:07 PM

To: WICHQ-SFPD

Subject: DocketID NUmber 0584-AD77, WIC Food Package Rule

To whom it may concern,

I am the for the Franklin County WIC Program in Columbus, Ohio writing concerning the proposed changes to the WIC food package for breastfeeding infants. The proposed rule states that formula would not be provided for fully or partially breastfed infants during the first month after birth. While the intentions may be good to discourage early supplementation, this may cause WIC mothers to choose not to breastfeed for fear that they cannot receive a back-up of formula should problems arise. Ideally if a mother has a breastfeeding problem or if there is a contraindication to breastfeeding she should be able to use donor milk. However, this is not an option for our WIC mothers. Currently, a mother with a breastfeeding issue can receive formula from WIC to supplement her breastmilk to feed her baby. Certainly, this mother should be applauded for her persistence in her breastfeeding efforts and attempts to give her baby the best milk. Under the proposed rule, if a mother is having difficulties she may request formula, which must be a full package. She would then be told she is no longer considered breastfeeding, undermining her breastfeeding efforts. This rule also does not take into account the premature babies that are breastfed and receiving fortified formula. This can give mothers the idea that formula is preferable. Changes with this rule will also lead to less mothers and babies reported as breastfeeding. I hope that USDA rethinks the impact that these recommendations will have on our WIC mothers and reconsider the withholding of formula for breastfeeding babies during the first month. An alternate option would be to withhold formula from all WIC mothers for the first month. Then any mother choosing to use any formula would have to buy it. In this manner, maybe the mothers planning on formula feeding may decide to breastfeed for awhile since they cannot get formula through WIC. One way to assist our breastfeeding moms in their efforts would be to provide increased funding for peer counselors and have access to free consults with a qualified lactation expert. Many WIC Programs lack the resources to support breastfeeding mothers experiencing problems.

LA-30

Sent: Thursday, September 21, 2006 9:23 PM
To: WICHQ-SFPD

Aloha, My name is and I work for the Community Clinic of Maui WIC Program. I am sending you my comments about the proposed WIC food recommendations for all WIC participants. We have recently done a 6 month statistical review on our WIC participants and found that from ages 1-2 years, 35% don't eat their daily recommended fruits, 83% don't eat their daily vegetables and 28% don't drink their daily recommendations of milk. As far as I'm concerned, maybe we should have fresh fruits and vegetables readily available for participants and not issue juice. After all, we are a Supplemental Nutritional Program. Our statistics vary of course on different age groups. We have done our statistics ranging from age 1-41+. Majority of our participants drink their daily intake of milk but do not reach their daily recommended intake for Fruits and Vegetables. I think that if it is readily available for our participants, they would reach their daily food goals. Fresh Fruits and Vegetables can be expensive for some of our participants so having a new food list that includes fresh fruits and vegetables, doing away with juice for children will be a good idea.

SEP 19 2006

**BARBER COUNTY COMMUNITY HEALTH
DEPARTMENT**
MEDICINE LODGE, KS. 67104

LA-31



September 18, 2006
Re: WIC Food Package Changes

Dear Patricia,

This note is to let you know that our Health Department is in favor of the proposed changes to the WIC food packages. The changes including fresh fruits and vegetables, less juice, etc. will greatly benefit the health of the children and Child-bearing Women that we see in our office. We are looking forward to this change, and think that our participants will be pleasantly surprised.

Sincerely,

LA-32

Sent: Monday, September 25, 2006 12:44 PM

To: WICHQ-SFPD

Subject: Comments of New Proposed WIC Food Packages

As a WIC certifier for 14 years, I am gratified to see the proposed changes to food & formula packages:

a.. I like the decrease in formula amounts for infants over 6 months old and the inclusion of baby fruits & veges. Also, "No juice" is an appropriate proposed change for this age group.

b.. For partially breastfed infants, I know that offering limited formula is the best way to avoid discouraging BF. Presently, we are able to offer a full formula package to these moms, which goes against my notion of encouraging mom's to BF as much as they are able.

c.. For fully BF infants at 6 months, I like the idea of offering meats, fruits, & veges, continuing to offer cereal, and eliminating juice. These are all in line with the best, most current nutrition recommendations.

d.. Soy milk is often requested by mothers of toddlers who have difficulty with cow's milk. I'd like to be able to offer them something in exchange for cow's milk, rather than advising them not to purchase this item that makes up a good portion of their food package. Goat's milk is sometimes requested also, with MD recommendation. As long as a prescription is required for these higher priced foods, I'm hoping costs to WIC will not be negatively impacted.

e.. For children, I very much agree that juice should be decreased. There is a belief among most parents I counsel that juice is nutritious, the more the better. However, high juice intake is a huge problem. It's difficult to convince parents to buy expensive fresh fruits (and veges) and forego the juice that is free, even though their children have dental carries and replace milk with the preferred juices. Parents offer it in unlimited quantities. This has been very frustrating.

f.. Other children's food package decreases are to control costs. It does seem to me, in talking with families over the years, that the amount of cheese, eggs and milk is often too much for the individual child, so other members of the family consume these foods. Very low income families will be impacted most by these reductions, so I have some concerns there. A small percentage of the families I see have difficulty providing enough food for their families even with food stamps and careful meal planning.

g.. Alternative sources of grains are a good change to offer foods more appropriate for diverse ethnic groups.

h.. Fresh fruits and veges are definitely a change WIC clients have been requesting. Farmer's Market Checks are a big hit with WIC clients.

i.. I like the addition of more fish, and more variety of fish, for BF women.
Thank you.

LA-33

Sent: Monday, September 25, 2006 2:46 PM

To: WICHQ-SFPD

Subject: Comment on Docket ID Number 0584AD77, WIC Food Packages Rule

Comment on Docket ID Number 0584AD77, WIC Food Packages Rule

I am a Registered Nurse working with the WIC Program in Ellsworth County, Kansas. I believe the proposed changes in the WIC packages will greatly assist in helping our clients to purchase the fresh fruits and vegetables that we have for so long urged them to include in their diet. Also, a reduction in formula will help reduce the number of lower income clients who continue to feed large amounts of formula after the age of 6 months. With the addition of baby foods, they will make better choices for those babies.

Ellsworth County Health Department
Ellsworth, KS 67439

LA-34

Sent: Monday, September 25, 2006 3:11 PM

To: wichq-sfpd@fns.usda.gov

Subject: The proposed changes to the WIC food package

As a dietitian working in a California central valley WIC Program, where a high rate of poverty and chronic health problems exist, I applaud the proposed rules and your adherence to the IOM recommendations. Please don't give into special interests and water down the changes! Something needs to be done, and it is time for the changes!

Thank you!

Stanislaus County Health Services Agency WIC Program

LA-35

From: WebMaster@fns.usda.gov
Sent: Monday, September 25, 2006 6:20 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Lynwood
STATE: CA
ORGANIZATION: Los Angeles Biomedical Research Institute @ Harbor
UCLA Medical Center WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: September 25, 2006
Time: 06:19:44 PM

COMMENTS:

I think the proposed package is great! It's nice to see such healthy additions since WIC is facing challenges such as obesity! I hope implementation is on the way soon.

LA-36

Sent: Wednesday, September 27, 2006 3:05 PM
To: WICHQ-SFPD
Subject: Docate 0584-AD77-WIC Food Package Rule

To Whom it May Concern:

Thank you for making the many changes especially less juice, adding whole grain bread, options for canned beans, fresh fruit and vegetables, baby foods for 6-11 months, and soy based items.

The concerns that I have are:

#1. is a lot of breastfeeding moms start out exclusively breastfeeding but many need to return to work in the first 4 weeks, so I feel adding 1 can of formula from 0-2 months would be helpful (then the moms do not have to return in one month instead of 2 to make package change (she would be able to visit 2 months PP).

#2. The recent concerns addressed the amount of mercury in tuna (higher than what was previously thought)-you have raised the amount of canned fish to 30 oz. (the fish advisory (PPH 44031states: "limit canned light tuna to 1 meal per week of 6 oz can" x 4 weeks per month = 24 ounces. I feel you should decrease the number of ounces to 24 oz or add canned chicken or turkey or beef as an alternate option and keep the 30 oz.

Some of the WIC parents wanted me to request the possibility of granola bars as an option for cereal choice as some of the children grow tired of the same kinds all the time.

Sincerely,

La Crosse County Health Department
WIC Nutrition Division
La Crosse, Wisconsin 54601

LA-37

Sent: Wednesday, September 27, 2006 4:19 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77 WIC food packages Rule

I have been a Nutritionist for the WIC Program for the past 23 years and am pleased to see some changes in the food package. I see many improvements but also have some suggestions.

Suggestions:

- a.. Older infants could get other choices for fresh or frozen fruits or vegetables.

Reason: In our area many parents make their own baby food and we encourage parents to have "family meals" right from the beginning by feeding baby pureed or mashed foods similar to other family members. Commercial infant foods are expensive and if WIC is the model of healthful food to buy parents may think they should buy more jarred foods when those purchased with WIC vouchers have been used rather than making their own.

- a.. Do not include flavored milk as a choice.

Reason: Most children are already exposed to many sweetened beverages and don't need more sugar added to their diets.

- a.. Juice could be decreased more with increase of dollar amount for fruits and vegetables.

Reason: WIC participants in our area are really listening to our message about drinking less juice and more water. They are serving their children fresh fruits instead of juice and I think we should encourage this by changing the food package.

Positive Changes:

- a.. Addition of canned beans.

Most parents are working and don't have time to cook dried beans. They choose higher fat peanut butter because it's faster.

- a.. Voucher for fruits and vegetables.

This helps to achieve the "5-a-day" goal.

- a.. Addition of fortified soy beverages.

They offer a choice for participants with milk allergies.

- 
- a.. Addition of grain choices more appropriate for culturally diverse populations.
New immigrants will be able to find foods familiar to their diets.

Stearns County WIC Program
Saint Cloud, Minnesota



LA-38

From: WebMaster@fns.usda.gov
Sent: Thursday, September 28, 2006 8:47 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Bridgeton
STATE: NJ
ORGANIZATION: Tri-County Community Action Partnership
CATEGORY: WICLocalAgency
OtherCategory:
Date: September 28, 2006
Time: 08:46:56 AM

COMMENTS:

Hello. Overall, I was very pleased to see some of the proposed changes. However, when I saw that proposed change for partially fed infants I was disappointed. At Tri-County WIC, we package tailor in order to give the mom the sense that "yes, I can do both." If we send her away with no checks for formula in that first month, I think that we are going to loose her as a client! Most moms want that "security" of atleast having a small amount of formula. I agree that a full package is inappropriate, but perhaps there is another happy medium. What if the max for the first month of a partially breastfed infant were to be 5 cans?

LA-39

From: WebMaster@fns.usda.gov
Sent: Thursday, September 28, 2006 11:13 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: bradford
STATE: pa
ORGANIZATION: wic at bradford regional medical center
CATEGORY: WICLocalAgency
OtherCategory:
Date: September 28, 2006
Time: 11:12:45 AM

COMMENTS:

I believe not allowing formula for the first month for breastfeeding moms will backfire. I feel we should offer less formula altogether. this would encourage individuals to think about nursing because of the expense. perhaps it sounds harsh but hitting the "wallet" registers with many of our clients.

Rather than whole wheat bread, we need to stipulate whole grain bread. many whole wheat breads on our area do not have any dietary fiber listed. I find the use of medical foods, bars, gels,capsules inappropriate for the majority of our clients. many times it is used as a quick fix rather than learning about nut ed and eating real foods. a defined prescription should be required on a monthly basis.
thank you

LA-40

From: WebMaster@fns.usda.gov
Sent: Sunday, October 01, 2006 4:12 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Salem
STATE: NJ
ORGANIZATION: Tri-County WIC
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 01, 2006
Time: 04:11:32 PM

COMMENTS:

Thank You USDA for finally making the needed changes to the WIC food packages. Adding fruits, vegetable, whole grains, and baby foods while reducing the amount of milk and especially juice is long overdue. The new foods provided will help low-income families to make better choices when purchasing foods for their families. I support all of the changes to the food packages with the exception of not providing formula to partially breastfed infants. Although I understand the reasoning behind this change, in reality forcing mom's to choose exclusively breastfeeding or exclusively formula feeding will result in fewer women choosing to breastfeed. Many moms either lack the confidence that they can breastfeed exclusively or they or their babies are experiencing complications. Instead of taking formula away from moms who are supplementing, we should be working with health care providers and hospital staff members on breastfeeding. I work part time at a hospital in my community and I know that many mom's go into the hospital expecting to breastfeed and the nurses, sometimes without the mother's permission, bottle feed the babies. Also recently the lactation services at my WIC clinic were discontinued because the State of New Jersey did not feel that we were a large enough site to warrant a lactation staff. Without support from WIC, pediatricians, nurses, midwives, and other health care professionals breastfeeding rates will not increase regardless of what is in the WIC food packages.

LA-41

From: WebMaster@fns.usda.gov
Sent: Monday, October 02, 2006 1:38 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Santa Rosa
STATE: CA
ORGANIZATION: Sonoma County WIC
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 02, 2006
Time: 01:37:35 PM

COMMENTS:

As a WIC Dietitian, I support the proposed food package changes. It is essential to provide children with healthy options such as whole grains, fruits, vegetables, and soy. These changes are very important to make ASAP due to the rise of childhood obesity and various diseases. Please keep our children's health in mind and keep the recommended changes in the food packages as they are.

LA-51

Sent: Thursday, October 05, 2006 11:32 PM
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: College Station
STATE: TX
ORGANIZATION:
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 05, 2006
Time: 11:32:19 PM

COMMENTS:

As a local agency Assistant Breastfeeding Coordinator and a former WIC participant, I whole-heartedly support the proposed changes to the WIC food packages.

LA-52

Sent: Thursday, October 05, 2006 4:32 PM

Subject: ?Docket ID Number 0584-AD77, WIC Food Packages Rule,?

Patricia N. Daniels

Director, Supplemental Food Programs Division Food and Nutrition Service USDA

3101 Park Center Drive

Room 528

Alexandria, VA 22302

“Docket ID Number 0584-AD77, WIC Food Packages Rule,”

Dear Ms. Daniels,

I am writing to comment on the proposed WIC Food Package changes. It is time to bring the package in line with the 2005 US Dietary Guidelines, the new Food Guide Pyramid and other science based national nutrition research. As a WIC Nutritionist I have read the proposal and have a few comments.

Regarding decreasing the formula package to 24 cans concentrate for infants 6-10 months I must disagree. During this time 24- 32 oz of formula is recommended. What will be offered is at the low end of that range. Also, there are many children and some adults who should have whole milk beyond 2 years of age such as those with weight gain issues, various medical problems, recent surgeries, etc. While I understand the need for low fat dairy products we WIC nutritionists should have the ability to tailor the milk to the individual's needs, including the use of whole milk where deemed appropriate by the nutrition professional.

Also, although we strongly encourage and educate moms to breastfeed many stop within the first month for many reasons. Refusing to allow any formula the first month may seem to the mom who stops BF in the first month like a penalty and discourage her from coming back to WIC at all. While this is not the desired outcome of extending BF duration it can discourage her from participating further and thus receiving the food and nutrition education benefits of the program. The addition of jar fruits and vegetables for infants vs juice is a great idea. The parents will appreciate the cost savings. The inclusion of fruits and vegetables year round is wonderful. These are the foods our participants eat the least with the most frequent complaint being their cost. I do not agree with the addition of sardines for fully BF women. They are extremely high in sodium and not a fish I would recommend to many.

Finally, I hope you plan to continue to have a default package that can then be tailored. Adding each item separately would be entirely too time consuming for our very busy WIC clinics. While I urge USDA to finalize the revisions as soon as possible I sincerely hope these suggestions for changes will be considered. As a nutrition professional I have

been "in the trenches" of the WIC Program for 11 years and have a lot of knowledge of what works and what doesn't.

Gloucester County WIC Program
New Jersey
Turnersville, NJ 08012

LA-58

Sent: Monday, October 09, 2006 2:08 PM

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

Dear Patricia,

I like the proposed WIC food package changes that are currently being looked into: fresh fruits & veggies, etc. However, I would love to see yogurt added to the dairy foods lists-I did see the soy beverage & tofu-excellent choices; and I like the idea of decreasing eggs & juices.

Thank you for giving us this time to comment on the foods we provide to our WIC folks!

Kittitas County Public Health Department
Ellensburg, WA 98926

LA-59

Sent: Tuesday, October 10, 2006 12:39 PM
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Rutland
STATE: VT
ORGANIZATION: VT Dept of Health, Community Public Health
CATEGORY: WIC LA Staff
OtherCategory:
Date: October 10, 2006
Time: 12:39:16 PM

COMMENTS:

I have many WIC moms who would love to serve their families more fruits and vegetables, but find the money tight to do so. Many are also choosing less juice for their children, as they are hearing from us and their healthcare providers that a little goes a long way.

LA-60

Sent: Tuesday, October 10, 2006 4:23 PM

Subject: Food Packages WIC Changes Coments-Docket Number 0584-AD77

Docket ID Number 0584-AD77 WIC Food Packages Rule

As a Registered Dietitian who has worked in a WIC program for 13 years I applaud some of the changes proposed for the WIC Food Program such as inclusion of fruits, vegetables, whole grains and limiting juices. These are things we strive to educate our participants about and it would be helpful to have them as part of the WIC food message that the food package gives. However, in consideration of those choosing to be vegetarians and those with food allergies it would be helpful to have fortified soymilk as an option in the food package for children. It will ultimately save WIC money because there are reasonably priced soymilk options that can be provided rather than special child formulas. I do not think we should be limiting milk in the food packages for children and pregnant women but rather emphasizing lower fat milk options (for children over 2 years of age unless the child is underweight). I do not think a breastfeeding woman should offer formula the first few months of life but in reality if we eliminate formula totally from the breastfeeding baby food package early in life those women who must return to work or school shortly after the birth of their baby will not choose to be exclusively breastfeeding but will just choose the full formula food package. This is especially true for women who are young mothers or do not have a strong support system. Even with the help of lactation peer counselors I see women reluctant to totally breastfeed.

I also see an atmosphere "entitlement" in that people are trying to get the most out of the WIC program and thus I believe they will choose the full formula packages rather than make use of the WIC lactation support.

UMDNJ WIC program, Newark N.J.

LA-61

Sent: Tuesday, October 10, 2006 4:35 PM
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Kalamazoo
STATE: Michigan
ORGANIZATION: WIC/CPA/Dietetic Intern
CATEGORY: LA Staff
OtherCategory:
Date: October 10, 2006
Time: 04:35:22 PM

COMMENTS:

The proposed changes in WIC are welcomed and long overdue. The proposed changes to add fruit and vegetables is a step in the right direction in helping to alleviate childhood obesity and the multiple health challenges and cost associated with this condition. As dietitians, we have to continue to work with our federal government, political leaders and farmers in terms of positive change for our consumers.

I am concerned about how each state government will interpret the proposed changes based on their population and budget such as in the soy versus milk distribution.

Michigan has a large population of the Middle Eastern/Asian culture, African American culture who have a high incidence of lactose intolerance and those who perceive soy milk a healthier dietary choice.

In terms of change, WIC is attempting to meet the 2005 Dietary Guidelines for Americans which is beneficial for good health.

LA-63

Sent: Wednesday, October 11, 2006 2:59 PM

Subject: Docket ID Number 0584-AD77, WIC Food Package Rules

USDA,

I have been a WIC Educator, Retail Coordinator and Certified Breastfeeding Counselor for 8 years in the state of Colorado. I fill these positions in 3 small counties, serving between 40-100 participants in each county.

I am strongly in favor of the proposed changes to the food packages, but have one main concern regarding the elimination of whole milk for all participants 2 yrs and older. I am very aware of the nationwide obesity epidemic and see this step as a good way to address the problem for the majority. However, living in small active mountain communities, I have very low obesity rates and often higher rates of children below the 5% for wt. It is these participants that I am concerned about, as whole milk is an excellent source of calories and fat for them. I would propose to retain one food package with whole milk available to children over 2, and one package with whole milk available to pregnant/breastfeeding women, so we can continue to meet the needs of these individuals as well.

Thank you for supporting these changes and considering my input.

Sincerely,

LA-64

Sent: Wednesday, October 11, 2006 3:32 PM

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

A proposed change that will most likely negatively effect our breastfeeding rates is on page 13 of the Comparison food chart attachment. If infants must be classified as either fully formula fed or partially breastfed, then anytime an infant 0-1 months of age needs formula a full formula package must be issued. This will likely lead to women choosing a full formula package over no formula, especially when women lack confidence or are experiencing difficulty during their infant's first month of age. We know that when women have access to formula, they are more likely to offer more and more formula, thus decreasing their milk supply. Breastfeeding is often unsuccessful when infants receive formula at such an early age. Ideally, we should be able to issue a partial formula package, even during the infant's first month of age, to help with breastfeeding rates. To help with self-confidence or early feeding problems many breastfeeding women prefer and choose to have easy access to formula "just in case" they need it, even if they don't use it. If they have too much formula on hand, they are likely to offer more of it to their infants.

I am glad to see that the proposed changes involve a reduction in dairy and juice products and an inclusion of fresh fruits and vegetables and jarred baby foods.

Sincerely,

WIC Director
Clermont County WIC
Batavia, Ohio 45103

LA-65

Docket !D #0584-AD77 WIC Food Packages Rule, WIC Program, Alamance County Health Dept., Burlington, NC

Sent: Thursday, October 12, 2006 11:48 AM

Subject: Docket !D #0584-AD77 WIC Food Packages Rule, WIC Program, Alamance County Health Dept., Burlington, NC

I am in support of the proposed WIC food package changes. In my professional opinion, they are well thought out and actually quite overdue.

As far as 2% or less milk for children aged 2 years and older, that is very good. There are a small number of underweight children that I feel do benefit from whole milk.

I would like to see a package which includes whole milk if deemed necessary by the nutritionist or health care provider. The standard packages should certainly only allow 2% or less for children 2 years or older.

Thank you,

WIC Nutritionist/ Alamance County Health Department, Burlington, NC

October 9, 2006

OCT 10 2006

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

LA-76

Dear Ms. Daniels,

I am very excited that USDA has proposed changes to the WIC Food Packages that are offered to its participants. As a WIC Nutritionist for the past 4.5 years, it is frustrating to make suggestions to families that the WIC Food Packages do not help support.

Some of the changes I am most excited about are:

1. No formula for a breastfeeding baby who is less than one month old. I hope this encourages more women to hold out on offering formula to their newborn infants. I am concerned some women may not try to breastfeed at all if they think they can't get any formula from WIC if they have issues. I would be anxious to read the results of the trial implementation of this policy.
2. The fluctuation (slight increase in formula at 4-5 months and then a decrease at 6-11 months) in the amounts of formula for those mothers who chose to bottle-feed. I believe the proposed changes will more closely mimic the appropriate intake for the infant's age. I think many of our participants (of which I saw one already this morning) fail to offer their 8-11 month olds enough solids, perhaps because of the amount of formula that are getting from WIC.
3. Allowing whole milk only to children 12-23 months old. Everyday we as WIC Nutritionists encourage families to lower their family's milk fat. Many do not ever try to drink lower fat milk and one reason may be because they can get any kind of milk they want using their WIC checks.
4. Reduction in the amount of juice offered. YEAH! Education will still be necessary to explain the use of fruits and vegetables in the diet vs. juice. The cash vouchers will help here.

I do realize that as these changes take place, education will be a very important component to explaining the changes to our participants. I believe the new Food Packages will be in better balance with the recommendations we make and the information we provide.

I look forward to our future.

Sincerely,

Chester County WIC Program

2936 Mahaska Way Sacramento, CA 95835
talsky2@msn.com

OCT 10 2006

October 8, 2006

Patricia Daniels, Director
Supplemental Food Programs Division
FNS, USDA
3101 Park Center Dr., Rm. 528
Alexandria, VA 22302

LA-77

Dear Ms. Daniels,

Thank you for the opportunity to review and comment upon the proposal to change the assembly of foods provided in the supplemental Food Program for Women, Infants & Children. As a public health nutritionist since 1973, I have seen the incredible increase in caseload of WIC eligible participants over the decades. The original food package assisted many families in growing their children healthier right from the gestational phase. In the more recent years, however, the needs of the families have changed from situations of lack of food and needed dietary components to inappropriate habits and an imbalance of calories and nutrients. Dental disease and obesity prevention have become the most common topics in counseling cubicles and the classroom alike.

I wholeheartedly support the proposals for the new WHOLE grains choices, and I highly support the proposal to provide an allowance for fresh produce (by the way, can we have these food instruments be redeemable at certified farmers' markets as well as the WIC authorized grocers?). I also strongly support the proposal to add tofu and soymilk as options to cow's milk. This will greatly enhance WIC's ability to serve the lactose-intolerant, the vegetarians, and the traditional cultural eating habits of a significant number of participants. And, last but not least, I majorly support the mandatory allowance of ONLY reduced-fat content milk for the WIC participants over 2 years old. This proposal implemented would SO greatly assist the WIC community to initiate healthier eating habits in the crucial early years of child development.

I applaud your steps to allow the WIC Program to finally provide the WIC families solid steps to access those healthier foods grown by farmers (fresh produce, soy, and grains) rather than some of the products processed by industry (refined juices).

BRAVO USDA !!

With gratitude for all of the USDA food programs,

*thank you so much!
😊*

County of Sacramento WIC Program

FNS Proposed Rule Changes Comments for Docket FD # 0584-AD??

LA-80

PKg I I feel eliminating IPB for the baby's 1st month of life will discourage rather than encourage Breastfeeding. Once clients figure out they have to Breast feed solely for the 1st month, they won't even initiate Breastfeeding.

I agree with no cereal until 6 months of age & no low iron formulas.

PKg II - Clients will like being able to get fruits & veg... many have asked for them in the past.

- Eliminating juice at this age is a very good idea
- Decreasing the amount of formula given at 6 months of age can be for seen as a big issue. Many clients feel we already don't give enough formula & accuse us of starving their babies.

PKg III - Infants that are medically fragile & developmentally delayed often times are delayed in the start-up of solids therefore they will need an increased amount of formula. It would not be appropriate to be supplying them with foods they can't eat. It would put a large financial burden on the parents to buy the formula we could be supplying. It should be determined case by case.

- Good idea for women fully breast feeding multiple to be able to have 1.5x pkg.

- pkg. IV
- Great that there will be a Soy beverage option with Dr. request.
 - Whole milk should be allowed for children >24m if the Dr. requests it to increase calories in diet for underweight cases.
 - lowering the juice to 16oz is a good idea, hopefully this will curb juice abuse

- pkg V
- Partially Breastfeeding moms with IPB who receive the maximum allowance of formula should still get a food pkg. even if it is abbreviated.
- Without a food pkg the breastfeeding moms will find it of no benefit to receive only info and no food thus discouraging extended breastfeeding durations among our moms.

Decreasing juice is great

A Soy beverage is a great addition.

- pkg VI
- Looks Good, but ~~it~~ should be for PP women also.
- Any women who is Breastfeeding should get the BF/preg. pkg.

VII

Great that this pkg includes preg. women. w/ > 1 fetus and 1.5x for BF women with > 1 Infant.

The new changes appear to discourage rather than encourage Breastfeeding.

It is better to Breastfeed and Formula feed than to only formula feed. Many clients will find some of these changes obstacles and they may decide not even to try to breastfeed.

1. I think bf women should be able to get some formula as long as they are bf at least 2 or 3 times a day.
2. Should still offer whole milk to all clients, with low fat options offered first.
3. I think offering fruit and veg is a great idea. The more foods offered the more people may sign up for Wic.
4. We really need a soy based product for children over one. We have had a great deal of clients ask for soy. Also adding tofu is a great idea.
5. Adding whole grain bread is a great idea also.

1. I don't agree with the no IPB option for the 1st month, because it will discourage woman to even try to bf.
2. I think having a soy milk option is good.

Dear USDA and Ms. Daniels:

Date: 9-28-06

Thank you for the opportunity to comment on the food package. I have worked for Upper Cardozo, a WIC Local Agency in Washington, DC, for 9 years as a Nutrition Technician. I learned a great deal about the needs of our WIC clients in this time.

LA 81

I believe that the following additions to the WIC package:

- Fruits and vegetables
- Baby foods for all infants and baby meat for breastfeeding babies
- Milk alternatives—calcium set tofu, soy milk
- Canned beans
- Salmon/sardines in addition to tuna
- Whole wheat bread, tortillas, other whole grain products

will effect our participants by: more children need these fruits & vegetables that they are not getting.

The reductions:

- Less milk
- Less juice
- Fewer eggs

will effect our participants by: they don't need all that protein

Changes:

- Less ability to substitute cheese
- Whole milk for children under two, 2% and lower fat for children older than two

will effect our participants by: not having enough cheese because some families have two or three children on the program & that is too much milk per month per family.

I think the breastfeeding package changes are a great idea. I feel that they will effect our participants by:

Thank you for your help making WIC even better!

Sincerely,

OCT 2 2006

Dear USDA and Ms. Daniels:

Date: 9/28/06

Thank you for the opportunity to comment on the food package. I have worked for Mary's Center, a WIC Local Agency in Washington, DC, for 3 years as a nutritionist. I learned a great deal about the needs of our WIC clients in this time.

VP 42

I believe that the following additions to the WIC package:

- Fruits and vegetables
- Baby foods for all infants and baby meat for breastfeeding babies
- Milk alternatives—calcium set tofu, soy milk
- Canned beans
- Salmon/sardines in addition to tuna
- Whole wheat bread, tortillas, other whole grain products

will effect our participants by: Our participants will be happy about these changes since they can use these foods.

The reductions:

- Less milk
- Less juice
- Fewer eggs

will effect our participants by: Most of our babies don't like the juice they will prefer the baby food.

Changes:

- Less ability to substitute cheese
- Whole milk for children under two, 2% and lower fat for children older than two

will effect our participants by: reducing the fat intake.

I think the breastfeeding package changes are a ~~good~~^{bad} idea. I feel that they will effect our participants by: discouraging new moms to breastfeed because they will not want to put in the effort but they will want to take the easy way out by getting formula.

Thank you for your help making WIC even better!

Sincerely,

Breastfed babies are healthier than formula fed babies and it feels like we have wasted our time with all the trauma on breastfeeding us

OCT - 2 2006

Dear USDA and Ms. Daniels:

Date: 9/28/06

Thank you for the opportunity to comment on the food package. I have worked for Mary's Center WIC, a WIC Local Agency in Washington, DC, for 2 1/2 years as a Nutrition Technician. I learned a great deal about the needs of our WIC clients in this time.

LA-83

I believe that the following additions to the WIC package:

- Fruits and vegetables
- Baby foods for all infants and baby meat for breastfeeding babies
- Milk alternatives—calcium set tofu, soy milk
- Canned beans
- Salmon/sardines in addition to tuna
- Whole wheat bread, tortillas, other whole grain products

will effect our participants by: get more choice. Spend all the WIC checks. make WIC more helping them.

The reductions:

- Less milk
- Less juice
- Fewer eggs

will effect our participants by: Can eat more Fruits get the Vitamin C. The kids not easy get more fat from the swice and not easy get a worse teeth from Juice sugar.

Changes:

- Less ability to substitute cheese
- Whole milk for children under two, 2% and lower fat for children older than two

will effect our participants by:

I think the breastfeeding package changes are a bad idea. I feel that they will effect our participants by: more not participants No breastfeeding. It will makes more jod to WIC Agency. because the participants thinking maybe can not get formula, that's why even the first month want to try, but worry about can not get formula that's why just stop.

Thank you for your help making WIC even better!

Sincerely,

OCT 2 2006

Dear USDA and Ms. Daniels:

Date: 9-28-2006

Thank you for the opportunity to comment on the food package. I have worked for Unity Children, a WIC Local Agency in Washington, DC, for 17 years as a Breastfeeding Peer Counselor. I learned a great deal about the needs of our WIC clients in this time.

2 PA 84

I believe that the following additions to the WIC package:

Are Good

- Fruits and vegetables
- Baby foods for all infants and baby meat for breastfeeding babies
- Milk alternatives—calcium set tofu, soy milk
- Canned beans
- Salmon/sardines in addition to tuna
- Whole wheat bread, tortillas, other whole grain products

will effect our participants by: _____

The reductions:

- Less milk
- Less juice
- Fewer eggs

will effect our participants by: _____

Changes:

- Less ability to substitute cheese
- Whole milk for children under two, 2% and lower fat for children older than two

will effect our participants by: Lowering cholesterol and preventing other long term illnesses or chronic illness - heart attack, stroke etc.

I think the breastfeeding package changes are a Bad idea. I feel that they will effect our participants by: By lowering the reported incidence of Breastfeed. Moms will report none Breastfeeding so as to not eliminate the security of having formula in case breastfeeding does not work.

Thank you for your help making WIC even better!

Sincerely,

Breastfeeding Counselor, WIC, Unity

OCT - 2 2006

Dear USDA and Ms. Daniels:

Date: 9/28/06

Thank you for the opportunity to comment on the food package. I have worked for HOWARD UNI HOSP, a WIC Local Agency in Washington, DC, for 1/2 years as a NUTRITIONIST. I learned a great deal about the needs of our WIC clients in this time.

LA-85

I believe that the following additions to the WIC package:

- Fruits and vegetables
- Baby foods for all infants and baby meat for breastfeeding babies
- Milk alternatives—calcium set tofu, soy milk
- Canned beans
- Salmon/sardines in addition to tuna
- Whole wheat bread, tortillas, other whole grain products

will effect our participants by: USING THESE TO REDUCE FAT
OTHER CHRONIC DISEASES

The reductions:

- Less milk
- Less juice
- Fewer eggs

will effect our participants by: _____

Changes:

- Less ability to substitute cheese
- Whole milk for children under two, 2% and lower fat for children older than two

will effect our participants by: _____

I think the breastfeeding package changes are a _____ idea. I feel that they will effect our participants by: _____

Thank you for your help making WIC even better!

Sincerely,

OCT - 2 2006

Dear USDA and Ms. Daniels:

Date: 09/28/06

Thank you for the opportunity to comment on the food package. I have worked for Children's Hosp a WIC Local Agency in Washington, DC, for 3 years as a Breastfeeding peer counselor. I learned a great deal about the needs of our WIC clients in this time.

LA 86

I believe that the following additions to the WIC package:

- Fruits and vegetables
- Baby foods for all infants and baby meat for breastfeeding babies
- Milk alternatives—calcium set tofu, soy milk
- Canned beans
- Salmon/sardines in addition to tuna
- Whole wheat bread, tortillas, other whole grain products

will effect our participants by: providing to the participants very good nutrition balanced =

The reductions:

- Less milk
- Less juice
- Fewer eggs

will effect our participants by: cutting some high fat Colostoral in the participants diet.

Changes:

- Less ability to substitute cheese
- Whole milk for children under two, 2% and lower fat for children older than two

will effect our participants by: cutting some high fat in the participants diet.

I think the breastfeeding package changes are a good idea. I feel that they will effect our participants by: Choosing exclusively BF. But it will be hard for a new mom who never BF to choosing only BF. The idea is like a wife with double blades. If mom doesn't have confidence, she will choose formula and then we will start losing BF rate
Thank you for your help making WIC even better!

Sincerely,

OCT -2 2006

Dear USDA and Ms. Daniels:

Date: 9/28/06

Thank you for the opportunity to comment on the food package. I have worked for Unity Health Care a WIC Local Agency in Washington, DC, for 15 years as a Nutrition Technician. I learned a great deal about the needs of our WIC clients in this time.

LA 87

I believe that the following additions to the WIC package:

- Fruits and vegetables
- Baby foods for all infants and baby meat for breastfeeding babies
- Milk alternatives—calcium set tofu, soy milk
- Canned beans
- Salmon/sardines in addition to tuna
- Whole wheat bread, tortillas, other whole grain products

will effect our participants by: INCREASING OUR REDEMPTION RATE
& THESE CHANGES HAVE BEEN LONG OVERDUE AND
SOME OF OUR CLIENTS HAVE BEEN INQUIRING
ABOUT FOR YEARS!

The reductions:

- Less milk
- Less juice
- Fewer eggs

will effect our participants by: REDEMPTION OF THE VOUCHERS
COMPLETELY, BECAUSE MOST AREAS FROM
PARTICIPANTS IS A LITTLE MUCH!

Changes:

- Less ability to substitute cheese
- Whole milk for children under two, 2% and lower fat for children older than two

will effect our participants by: NO COMMENT

I think the breastfeeding package changes are a _____ idea. I feel that they will effect our participants by: NO COMMENT

Thank you for your help making WIC even better!

Sincerely,

OCT - 2 2006

Dear USDA and Ms. Daniels:

Date: Sep 28, 2006

Thank you for the opportunity to comment on the food package. I have worked for Unity Healthcare, a WIC Local Agency in Washington, DC, for 5 years as a Breastfeeding Peer Counselor. I learned a great deal about the needs of our WIC clients in this time.

I believe that the following additions to the WIC package:

- Fruits and vegetables
- Baby foods for all infants and baby meat for breastfeeding babies
- Milk alternatives—calcium set tofu, soy milk
- Canned beans
- Salmon/sardines in addition to tuna
- Whole wheat bread, tortillas, other whole grain products

will effect our participants by: These items may be able to help in WIC clients improving their diets towards better eating.

The reductions:

- Less milk
- Less juice
- Fewer eggs

will effect our participants by: The milk can be reduced, as sometimes it is too much but do not reduce the juice, do not reduce the eggs in the packages

Changes:

- Less ability to substitute cheese
- Whole milk for children under two, 2% and lower fat for children older than two

will effect our participants by: The lower milk fat content would be good. However continue to allow participants to be able to substitute cheese.

I think the breastfeeding package changes are a _____ idea. I feel that they will effect our participants by: ultimately forcing mothers to decide to

get a non-breastfeeding package and receive infant formula because there ~~are~~ are no options for those returning to work. Also, there is a far lower cost value for breastfeed packages compared to the formula packages, so clients will

Thank you for your help making WIC even better!
Say they are not breastfeeding, even if they are in order to get the higher cost formula.

Sincerely,

LA
88

OCT - 2 2006

Dear USDA and Ms. Daniels:

Date: 9/28/06

LA
89

Thank you for the opportunity to comment on the food package. I have worked for Childrens Hosp, a WIC Local Agency in Washington, DC, for 1 years as a WIC Assistant. I learned a great deal about the needs of our WIC clients in this time.

I believe that the following additions to the WIC package:

- Fruits and vegetables
- Baby foods for all infants and baby meat for breastfeeding babies
- Milk alternatives—calcium set tofu, soy milk
- Canned beans
- Salmon/sardines in addition to tuna
- Whole wheat bread, tortillas, other whole grain products

will effect our participants by: Helping the clients to make healthier nutrition choices when shopping. Because if its left up to the clients, some anyway, they will not purchase these healthy products.

The reductions:

- Less milk
- Less juice
- Fewer eggs

will effect our participants by: Helping clients to spend each check for the month, clients are complaining that they don't spend all checks, because theres too much milk.

Changes:

- Less ability to substitute cheese
- Whole milk for children under two, 2% and lower fat for children older than two

will effect our participants by: I feel the client should be provide any kind of milk they choose as long as the childs over 1 year old.

I think the breastfeeding package changes are a OK! idea. I feel that they will effect our participants by: Healthier eating habits for mom and baby!

Thank you for your help making WIC even better!

Sincerely,

OCT - 2 2006

Dear USDA and Ms. Daniels:

Date: 9/

LA-90

Thank you for the opportunity to comment on the food package. I have worked for WIC of DC, a WIC Local Agency in Washington, DC, for 17 years as a Peer Counselor and Consultant. I learned a great deal about the needs of our WIC clients in this time.

I believe that the following additions to the WIC package:

- Fruits and vegetables
- Baby foods for all infants and baby meat for breastfeeding babies
- Milk alternatives—calcium set tofu, soy milk
- Canned beans
- Salmon/sardines in addition to tuna
- Whole wheat bread, tortillas, other whole grain products *nutrition*

will effect our participants by: Improving general through healthier foods and more choices

The reductions:

- Less milk
- Less juice
- Fewer eggs

will effect our participants by: Help participants realize milk (which is often not enjoyed or well tolerated) is not so necessary to healthy living - is education to underscore this encouraged. whole fruit over juice - much healthier

Changes:

- Less ability to substitute cheese
- Whole milk for children under two, 2% and lower fat for children older than two

will effect our participants by: Cheese needs to be available to substitute for those who don't like or cannot tolerate milk.

I think the breastfeeding package changes are a BAD idea. I feel that they will effect our participants by: undermining women's intentions about breastfeeding if they are uncomfortable or insecure. Breastfeeding initiation & duration rates will decline. Formula should be prescriptive ~~only~~ after the 1st month for medical needs only. allocate more \$ and tools for breastfeeding education & support. Train WIC staff and have more Breastfeeding Peer Counselors part-time paid a living wage.

Thank you for your help making WIC even better!

Sincerely,

WIC of the District of Columbia has seen a steady rise in BF rates. Every breast feeding peer counselor and many substitutionists who work here can testify to having hard won successes with mothers who ~~may or may not~~ have had varying degrees of prenatal breastfeeding education, and come from birth ~~care~~ ^{some times made in} need. The decision to commit or ^{not to} ~~to~~ ^{and} atmosphere of fear, insecurity, pain, separation for medical reasons; lack of family, social and medical support; when faced with such a narrow range of choices, many of these ~~we~~ we seek to counsel will simply opt out. Every mother facing such a decision needs to be ~~paired~~ ^{paired} a knowledgeable, available and competent advocate. If the USDA really believes that breastfeeding is important, there is a lot more to be done besides changing formulas. The emphasis on breastfeeding needs to be promoted to at least the level of the 5 a day Campaign and communicated as the single health intervention that confers a life time of benefits in most of the chronic disease areas facing Americans. It also requires support from partners such as CDC, Super markets, and a national mandate for the training of health care providers, inclusion in health professional education, and public education (USDA). Thank you for the opportunity to express my opinion. Doing what is right and thorough to support breastfeeding will ultimately result in major reduction in expenditures through ^{smaller} WIC purchases & fewer sick babies. Sincerely,

OCT - 4 2006

Dear USDA and Ms. Daniels:

Date: 9-28-06

Thank you for the opportunity to comment on the food package. I have worked for CHILDREN'S HEALTH CENTER a WIC Local Agency in Washington, DC, for 18 years as a NUTRITIONIST. I learned a great deal about the needs of our WIC clients in this time.

I believe that the following additions to the WIC package:

- Fruits and vegetables
- Baby foods for all infants and baby meat for breastfeeding babies
- Milk alternatives—calcium set tofu, soy milk
- Canned beans
- Salmon/sardines in addition to tuna
- Whole wheat bread, tortillas, other whole grain products

LA-91

will effect our participants by: _____

The reductions: OK

- Less milk
- Less juice
- Fewer eggs

will effect our participants by: Help with weight / Height - TO CONTROL WGT - GAIN !!!

Changes:

- Less ability to substitute cheese
- Whole milk for children under two, 2% and lower fat for children older than two

will effect our participants by: SAME AS ABOVE

I think the breastfeeding package changes are a Good idea. I feel that they will effect our participants by: CONTROL WGT GAIN - WE MAY ↓ ↓ % of Breastfeeding

Thank you for your help making WIC even better!

Sincerely,

SEP 29 2006

LA-92

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

Sept. 28, 2006

Dear Patricia Daniels,

I am a registered dietitian who has worked with various WIC programs since 1984. I am delighted that the USDA has finally begun the process of up-dating the WIC food package. Thank you! We have been waiting a long time for this.

Having worked in WIC in a variety of settings and with many different ethnic groups, I applaud the addition of soy products, whole grains and fruits and veggies. These healthful foods will be greatly appreciated by our participants and staff alike.

I also agree that the amounts of milk and cheese have been excessive, and support the lowered amounts, as well as the limit on whole milk. I think these changes are important, especially the cheese, to lower the current high saturated fat and cholesterol in the food package.

The juice amounts have also been excessive and are suspected of contributing to the excess weight gain we are seeing in many of our participants. I support the new juice guidelines. It would be of great benefit to increase the dollar amount for fresh fruits and veggies, if at all possible, because of their outstanding benefits to health and weight control. This is especially true for those with, or with risk factors for, diabetes.

The only changes I am sorry to see are the reduction in eggs. I do not think the amount of eggs in any of the packages should be reduced. I understand the push to reduce blood cholesterol, but I think this can be better achieved by reducing the milk and cheese, especially since saturated fat contributes more toward the raising of blood cholesterol than does dietary cholesterol. I do not think cholesterol intake, per se, should be an "aggressive" dietary concern for our participants. Eggs provide a wealth of nutrients, in addition to protein, which have been indicated as being important for our WIC population. Even the most conservative recommendation on eggs is 4 per week for healthy people. This works out to 17.3 eggs per month per person. For infants over 6 months old, we recommend egg yolks be started as a protein, iron, choline, folate and cholesterol source. Cholesterol is important for brain growth from birth to age 5, at least. Since infants receive no eggs in their package, these eggs will come out of mom's

package leaving her far fewer for herself. In my 22 years at WIC, I have seen many children who will not eat any protein source food except eggs. For pregnant women with nausea, eggs are an easy to eat, easy to cook and practically odorless protein source. For those with diabetes, eggs are recommended as a way to moderate carbohydrate digestion and absorption. It is clear to me that while protein may no longer be a target nutrient for the WIC population as a whole, there are subgroups and times when eggs may be the major protein source. All cultural and ethnic groups use and enjoy eggs, with the exception of strict vegans and lacto-vegetarians. Eggs come in their own "portion controlled" units, making them ideal for small servings. Therefore, I urge you not to reduce this important WIC food source.

Thanks again for updating the WIC food package.

Sincerely,

WIC Nutritionist

Santa Rosa, CA 95403

OCT - 5 2006

Dear USDA and Ms. Daniels:

Date: 9-28-06

LA
93

Thank you for the opportunity to comment on the food package. I have worked for HUH, a WIC Local Agency in Washington, DC, for 3 1/2 years as a WIC nutritionist. I learned a great deal about the needs of our WIC clients in this time.

I believe that the following additions to the WIC package:

- Fruits and vegetables
- Baby foods for all infants and baby meat for breastfeeding babies
- Milk alternatives—calcium set tofu, soy milk
- Canned beans
- Salmon/sardines in addition to tuna
- Whole wheat bread, tortillas, other whole grain products

will effect our participants by: given a choice wider choice for milk of the calcium alternative which is now limited

The reductions:

- Less milk
- Less juice
- Fewer eggs

will effect our participants by: making them drink more cool aid or high caloric less nutritious drinks, so keep the juice as is; do not lessen the amount

Changes:

- Less ability to substitute cheese
- Whole milk for children under two, 2% and lower fat for children older than two

will effect our participants by: _____

I think the breastfeeding package changes are a bad idea. I feel that they will effect our participants by: _____

I think that this will discourage participants from breastfeeding if they do not get breastfeeding pkg for mother after 6 mos. I think there should be a limited pkg for breastfed infants and breastfeeding mothers. e.g. Regardless of how many times you state that you are breastfeeding you get no more than certain amt. of formula. or you are considered non breastfeeding

Thank you for your help making WIC even better!

Sincerely,

Department of Health
St. Johnsbury District Office

Agency of Human Services

St. Johnsbury, VT 05819-2638
www.HealthyVermonters.info

October 3, 2006

LA-94

Patricia N. Daniels, Director
Supplemental Food Programs Division
Food & Nutrition Service / USDA
3101 Park center Drive, Room 5258
Alexandria, VA 22302

Dear Ms. Daniels:

As a certifier for the WIC program I will be able to offer the proposed food packages to WIC clients with a clearer conscience since they are reflective of the Dietary Guidelines and current feeding practice guidelines. Offering whole grains, fruits and vegetables is a great change!

The following are my suggestions:

Allowing fruits & vegetables to be increased if a family wishes to reduce or eliminate juice.

Including whole wheat flour and whole grain pastas as options for whole grains.

Continue to offer lowfat cheese as one of the cheese options.

Only offer natural peanut butter.

Thank you for the opportunity to comment on the proposed changes. I look forward to day when the new food package becomes reality!

Sincerely,

OCT - 2 2006

LA
98

Dear USDA and Ms. Daniels:

Date: 9/28/06

Thank you for the opportunity to comment on the food package. I have worked for Mary's Center WIC, a WIC Local Agency in Washington, DC, for 3 years as a Coordinator. I learned a great deal about the needs of our WIC clients in this time.

I believe that the following additions to the WIC package:

- Fruits and vegetables
- Baby foods for all infants and baby meat for breastfeeding babies
- Milk alternatives—calcium set tofu, soy milk
- Canned beans
- Salmon/sardines in addition to tuna
- Whole wheat bread, tortillas, other whole grain products

will effect our participants by: offering more choices, increasing fiber, improving intake of vitamins, minerals and phytochemicals. This will also help to meet the needs of a culturally diverse community.

The reductions:

- Less milk
- Less juice
- Fewer eggs

will effect our participants by: decrease intake of juice I think the amount of milk is ok for pregnant, breastfeeding and post-partum women. Fewer eggs will help to reduce the cholesterol + saturated fats in the diet.

Changes:

- Less milk for children is a good idea.
- Less ability to substitute cheese
- Whole milk for children under two, 2% and lower fat for children older than two

will effect our participants by: helping to reduce the fat intake in the diets, along with reducing saturated fat content.

I think the breastfeeding package changes are a bad idea. I feel that they will effect our participants by: discouraging moms from breastfeeding. They will learn to say they are not breastfeeding because they want formula. Our moms at Mary's Center almost always breastfeed but they often want formula - as much as possible because they work. Our families are poor. They will want more formula. Also - if moms are not going to get a food package after the baby is 16 months -

Sincerely,

families are poor. They will want more formula.

Also - if moms are not going to get a food package after the baby is 16 months -

Old, they will not take the time to recertify if they are only breastfeeding one time per day. Due to funding issues, it is a long process to recertify and I do not feel moms will go through it if they are not receiving a package. We will be discouraging breastfeeding inadvertently. We will also be under-reporting our breastfeeding rates because moms will say they are not, even if they are, so they can get more formula. We work very hard to promote breastfeeding and I feel that all of our hard work will be for nothing, which then will discourage staff from promoting breastfeeding.

OCT 20 2006

LA-107

c/o Bi-County WIC
Lock Haven, PA 17745

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

Oct 16, 2006

Dear Mrs. Daniels,

As a nutritionist with the WIC Program for almost 15 years, I appreciate the opportunity to make comments on the proposed food package changes.

My comments are specifically concerned with the addition of jarred fruits and vegetables for infants. Whereas I do agree that fruits and vegetables should be added to the infant food package, I don't think that offering these foods in baby food jars is the most cost effective, nutritious or environmentally responsible way we can achieve our goal of providing infants with more foods. With the average cost of stage one 1 oz single ingredient foods (at 55 cents per jar) 32 jars would cost \$17.60/month, 64 jars costing over \$35.00 per month. These very same fresh foods, ie. bananas, sweet potatoes, carrots, applesauce, etc. cost a fraction of the price. As an example, bananas cost 49 cents/pound (or 3 cents per ounce). At 55 cents for a 2 oz stage one jar the equivalent cost is \$4.40/pound for bananas. Stage one foods are easy to prepare, requiring no more than a fork or small appliance if necessary. I believe that mashing a banana or boiling or baking a sweet potato is not very time consuming and also saves on more unnecessary packaging. This packaging is especially wasteful considering baby food now comes in plastic containers, which are very expensive environmentally. If we calculate the amount of cans of formula per month and add in 32 more plastic jars, the environmental cost of feeding babies formula and jarred baby foods becomes extremely expensive environmentally.

I do not believe WIC, which is devoted to improving the health of infants and children, should be promoting the use of packaged foods which contribute to environmentally related illnesses, such as cancer.

If we provide a pound of bananas, apples, sweet potatoes and carrots to each infant we will empower mothers to provide fresh, healthy and more filling foods for their babies. In the years that I have encouraged women to make their own baby foods I have had a majority of them come back and say how grateful they were to have saved over \$15.00/wk while at the same time making their children better eaters. They especially notice that when the babies have begun home prepared baby foods as infants they are much less picky eaters as toddlers.

I appreciate the chance to voice my views on this and I sincerely hope they will be taken into consideration.

Sincerely,

Bi-County WIC



Daniel J. Raub, DO, MA, FACOFP
Health Commissioner

Medina, Ohio 44258

OCT 20 2006

October 20, 2006

LA-106

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

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

Dear Ms. Daniels:

I enthusiastically support the proposed changes to the WIC food package for women and children. The new proposed food package will promote healthier lifestyles and food selections to reduce the risk for chronic diseases and improve the overall health of WIC's diverse population of women and children.

While I understand the intent and science behind the change to the food package for the partially breastfed infant, **I do not, support the proposed rule to eliminate the issuance of formula to breastfed infants during their first month of life.** While I do fully promote and support breastfeeding among WIC participants, many circumstances prevent a woman's ability to fully breastfeed her infant, especially during the first month of life. As a registered, licensed dietitian working with the WIC program for 14 years, I have seen many women with a strong desire to exclusively breastfeed their infant, but unable to meet their goal (even with the help of a lactation consultant and/or WIC health professional) for one or more of the following reasons:

- Inadequate weight gain
- Inability for the infant to latch at the breast for appropriate milk transfer
- Premature birth
- Multiple birth
- Separation of the mom/infant dyad due to medical complications
- Inability to maintain adequate milk supply
- Physiological difficulties (i.e. Cleft lip/palate; flat or inverted nipples; large breast vs. small baby)
- Contraindicated medications



Daniel J. Raub, DO, MA, FACOFP
Health Commissioner

Medina, Ohio 44258

In my experience, many of the women that my colleagues and I have worked with that presented with one of more of the for-mentioned breastfeeding difficulties were able to eventually successfully breastfeed exclusively. The key to their success, however, was the combination of intervention by a breastfeeding specialist and formula supplementation during the early weeks of breastfeeding, thereby allowing the mother time to work through the problems.

My fear is that if the proposed rule is approved as currently presented, the very women we are trying to help and support to give their baby the best start in life through breastfeeding will feel abandoned by the WIC program. That our most vulnerable citizens will not receive the appropriate support they need through the early weeks of life to ensure life-long health.

Please consider the suggestion that states be given the option to provide the breastfeeding infant, in the first month, 1) no formula for the healthy breastfeeding infant/mom dyad, 2) formula supplementation when medically indicated, 3) formula supplementation, with need determined and documented by a WIC health professional to support the ongoing efforts of the new mother who is working through breastfeeding difficulties.

I appreciate your consideration of the above suggestions and look forward to continuing my work with the WIC program to improve the nutritional health of WIC participants.

Sincerely,

Medina County WIC Director

OCT 20 2006

October 16, 2006

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

LA-110

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

Dear Ms. Daniels:

The new 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 changes in the proposed rule are also 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.

However, I do not support the recommendation of the "partially breastfed infant" package. This proposed package denies formula during an infant's first month of life if he/she is partially breastfed. Theoretically, I understand that by denying formula for the infant's first month of life a partially breastfeeding woman is to be persuaded to breastfeed exclusively. However, there are several circumstances when it is not feasible for a woman to exclusively breastfeed nor advisable for a health professional to encourage exclusive breastfeeding:

- Failure to thrive infant that needs extra calories
- Contraindicated breastfeeding medications that the nursing mom may have to take after delivery
- Multiple births
- Premature infants needing supplementation
- Low milk supply issues
- Returning to a work or school environment that does not allow mom to pump adequately
- Physiology issues for example cleft lip/palate

In the circumstances listed above, the woman may want to exclusively breastfeed, but can only partially breastfeed secondary to her situation. Some of these circumstances may resolve which will eventually allow the woman to resume exclusive breastfeeding. Until exclusive breastfeeding can be resumed, the infant must be supplemented with formula during its first month of life.

Personally, as a former breastfeeding, working mom who was hospitalized after the delivery of my infant, and professionally, as a WIC Health Professional, I

hope that the "partially breastfed infant" package will be re-evaluated. It is my fear that women who experience a set back with breastfeeding during the infant's first month of life may stop breastfeeding if WIC will not support them with a supplemental formula package. Please support all of WIC's breastfeeding moms by allowing partial formula packages during the infant's first month of life, especially during situations of medical necessity.

Sincerely,

WIC Health Professional

OCT 17 2006

LA-117

October 16, 2006

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

Dear Ms. Daniels;

This is a letter of support for the proposed changes to the WIC food packages. I strongly support the addition of fresh fruits and vegetables, elimination of juice for infants and reduction in juice for children, and decreased amounts of milk for children and women. I also support the addition of soy milk for some children and women, and discontinuance of low iron formula.

There are two changes which I would encourage you to reconsider. The first is the addition of commercial infant foods beyond the age of 8 or 9 months. The second is the elimination of formula during the first month for mothers who are breastfeeding.

Commercial Infant Foods beyond 8 or 9 months: A common problem for WIC is getting parents to make the transition from infant foods to regular table foods. Providing commercial infant foods beyond 8 to 9 months will give the impression that commercial infant foods are desirable and even necessary for infants when in fact they may be undesirable beyond 8 to 9 months. It makes the transition from baby foods to table foods more difficult. Prolonged use of commercial infant foods may also cause financial hardship for WIC parents who may be lead to believe that commercial infant foods offer an advantage over home prepared foods. This is poor teaching for WIC parents, has the potential to harm infant growth, and will create another entitlement to an industry unwilling to give up their market share once established. Growth issues are already a problem in WIC infants around year of age with parents who have failed to transition their infants to a diet more appropriate for a one year old.

Formula for breastfed infants during the first month: Because of a misunderstanding in my WIC clinics, some of the nutritionists started to limit breastfeeding mothers to only one can of formula during the infant's first month. I became aware of the problem because breastfeeding rates in the clinics started to drop. When I investigated, I found that mothers would declare themselves "non-breastfeeding" in order to get more than one can of formula. The mothers would do this even though it meant that they themselves would stop receiving any food from WIC (our clinics do not serve Priority 6, non-breastfeeding, postpartum women). These women ended up with 9 cans of formula and the effect on breastfeeding was worse than if they received a few cans of formula.

I strongly support the intention behind not giving formula to breastfeeding mothers during the first month, but I fear that it will have the opposite effect. The ideal would be

to give no mothers formula (breastfeeding or not) for the first month of life, but I suspect that no one, including myself, would have sufficient fortitude to make such a recommendation and carry it through.

Thank you for your time in reading this letter. Again, I strongly support the overall concept of the changes to the food packages and I look forward to the implementation of the new food packages. I hope you will reconsider the points addressed above.

Sincerely,

WIC Manager
Denver Health

Denver, CO 80205

County of San Luis Obispo • Public Health Department



Family Health Services Division

San Luis Obispo, California 93406

*Gregory Thomas, MD, MPH
County Health Officer
Public Health Department Director*

*Pamela Dudley, PHN, MSN
Public Health Nursing Director*

LA 118

10/20/06

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

OCT 24 2006

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

Dear Ms. Daniels,

Thank you for the opportunity to provide comments on the USDA's proposed regulations that substantially revise the WIC Food Packages. On behalf of the San Luis Obispo County WIC Program, I am pleased to support these long-awaited reforms. I applaud 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. I believe that, when implemented, they will greatly strengthen the WIC program's ability to improve the nutrition and health status of millions of families.

1. Timely Implementation of Final Rule. The WIC Community has waited for 32 years for these comprehensive science-based nutritional revisions. As a local WIC agency Program Coordinator I am eager to get started on the planning and implementation issues involved with so many major changes to WIC foods. Therefore, I urge USDA to conduct its analysis of the comments on the Proposed Rule quickly and efficiently, and **publish a Final Rule by mid-2007 at the very latest.** WIC families should not have to wait any longer for better WIC foods!

2. Fruits and Vegetables. I strongly support 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. I urge USDA to work with Congress to secure increased federal funding in future years 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**

3. Other Positive Changes Will Improve Dietary Intake. I support 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, I 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. To further enhance the food package for women and children, I urge USDA to **return yogurt to the list of food substitutions for milk as originally recommended by the IOM.**

All of these proposed changes will strongly reinforce WIC nutrition education messages, as well as address the cultural food preferences among California's diverse population.

I look forward to working with USDA 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.

Sincerely,

MS, RD
WIC Program Coordinator
San Luis Obispo County WIC Program

OCT 24 2006

LA-121

7 Salina Court
Hockessin, DE 19707
October 19, 2006

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

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

Dear Ms. Daniels:

I have worked as a WIC Nutritionist for the past 15 years in two different states, West Virginia and Pennsylvania, and have seen the need to change the food packages provided to WIC participants. Too much milk for women and children, too much juice for children, the absence of fresh produce, and the need for foods for allergic participants are just a few of the reasons why the current packages don't do what they could be doing for at-risk families.

As a Certified Lactation Consultant, I am in favor of promoting exclusive breastfeeding among our WIC mothers as much as possible. The current enhanced food packages don't appear to provide much of an incentive to mothers, and the ease of obtaining formula works against us. Please encourage changes that will send the message that WIC is serious about nursing.

Accountability to the general public for wise use of government spending means change in the foods we are currently providing. Accountability to the health of our participants means changing the food packages. I feel the recommended changes have been studied, are nutritionally sound, and should be put into place.

Sincerely yours,

CLC
WIC Outreach and Breastfeeding Coordinator
Chester County WIC Program

West Chester, PA 19380

Wilkes-Barre, PA 18701-1700



October 20, 2006

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

LA-30

OCT 25 2006

RE: Response to Proposed changes to the WIC Food Package.

Dear Ms. Daniels:

Maternal and Family Health Services serves about 20% of the WIC participants in the state of PA. We serve approximately 55,000 participants per month. After reviewing the proposed changes to the WIC Food Package we have the following responses:

1. Regarding the change that states that there will be no partially breastfed infants for the first month, MFHS feels that this is a positive change for the "full term baby". Exceptions should be made for pre-term infants or infants who are ill who may require (1) human milk fortifier or (2) formula during early stages of growth when exclusive breastfeeding may be compromised, or for medical reasons of mother baby dyad. Furthermore, MFHS would like to express concerns that without adequate education and coaching breastfeeding participants may opt for formula as a back up option. It would of course be our intention to provide this education and coaching to all pregnant and breastfeeding participants.
2. Regarding no whole milk for children over the age of 2, we feel that this should be the default option, but that our Nutritionist should have the ability to over-ride this option based on their professional judgment.
3. Regarding needing a prescription for Tofu and soy milk, we do not understand the reason for this. We feel it should be a lifestyle choice not a medical decision.
4. We feel the provision of canned beans is an excellent addition.
5. We do not feel that the addition of reduced fat peanut butter is a positive change. Reduced fat peanut butter often is less nutritious and may contain undesirable additives such as extra sugar and fillers.
6. Regarding the addition of fruit and vegetable vouchers, we feel that the addition of fruits and vegetables is overall a very positive change. However we have concerns over the logistics of 2 separate vouchers, one for foods and one for fruits and vegetables. We feel training would be a considerable challenge and that there would be profound confusion among WIC participants and retail stores. We have concerns about the dollar amounts in that we feel participants may have trouble determining when they have reached the desired amount when weighing fresh produce.

7. We feel that the change regarding people who are on special formula having the option to get food also is a positive change.
8. Our greatest concern regarding the changes is that with the variety of foods available, there may be a large amount of confusion at the point of purchase. What will the stores be required to have in a minimum inventory? The participants will need to have a very thorough description of how to shop using the new food package. Retail store training will need to be very extensive. This is a barrier, that needs to be addressed, but we feel can be overcome.

Over all we feel that the changes will make a positive contribution to the good health of WIC participants and are in keeping with the current dietary guidelines. We feel that the changes will be worth the challenge it will take to implement them and we are ready for the next step.

Thank you for your consideration.

Sincerely,

Director of WIC Administration
Maternal and Family Health Services

Wilkes Barre, PA 18701

October 10, 2006

OCT 20 2006

LA-
133

Dear US Department of Agriculture,

I am writing to inform you of what my thoughts are about the proposal to change WIC foods.

The changes that I like the most is offering low fat milk for ages 2 and older, because many participants are not aware at what age they can offer low fat milk. Also giving participants eight dollars for women and six dollars for children to buy fresh fruits and vegetables, is an excellent idea because they have the opportunity to add these to their meals. Offering whole grain tortillas, bread, and brown rice is good because many of our participants want to eat healthy, but they don't have these foods, which are too expensive for them. Many of the times we see toddlers and children drinking lots of juice instead of drinking water because many are under the impression that they need to drink juice to increase their vitamin C intake. Reducing the amount of juice that is being offered in the food packages and replacing them with fresh fruits and vegetables eliminates that "liquid sugar" and provides them with other nutrients besides vitamin C.. The other proposal that is good is giving the exclusively breastfeeding mother the option of choosing salmon, sardines, or light tuna instead of only tuna.

The reason I like these changes are because we are giving participants the opportunity to teach themselves and their children at a young age to eat healthier with the new WIC food package.

The few things that I would like to see different from the proposal are not to require prescription for soymilk for toddlers. The reason is that we have mothers coming into our office and telling us they need soymilk because their child unable to tolerate milk. Requiring a prescription from the doctor's office would overwhelm the doctor who have more important things to do and inconvenience the participant who have transportation issues. Another thing that I would like to see changes on the proposal is that many cultures are not accustomed to eating cheese so I would like to see other options like yogurt and cottage cheese made possible for the participants.

Thank you for your efforts to make WIC families healthier and the time to read this letter.

Sincerely,

Nutrition Assistant II
Sacramento County WIC Program

October 5, 2006

OCT 20 2006

Dear US Department of Agriculture:

I am writing to tell you what I think about the proposal to change the WIC foods. I am thrilled that these changes have been proposed. The changes I like the most are:

- Fresh fruits and vegetables
- Whole grains, and especially the addition of tortillas, brown rice and bulgur
- Less milk and juice
- Soy milk and tofu being offered as an alternative
- Decreased amount of infant formula provided
- Increased foods for exclusively breastfed infants and lactating mothers

LA-134

I have worked in the WIC Program as a Registered Dietitian for 16 years, and in the arena of public health nutrition for 20 years. The greatest nutritional risk that I have consistently seen over this long time span has been that infants, children and women drink too much milk and juice and don't eat enough fresh fruits, vegetables and whole grains. The current WIC food vouchers have been a source of frustration to me for many years. I would consistently see overweight and underweight children consuming large amounts of milk and juice and not eating healthy meals. In addition to the large amounts of milk and juice that families receive from WIC, I would see a great majority of parents spend their own limited amount of resources buying more milk and juice believing that these foods need to be consumed in large amounts. This belief stems from the fact that since the government via the WIC Program provides milk and juice to them in large quantities, it must be very healthy to consume large amounts daily.

The changes I would like to see are to dispense with the juice entirely and to provide more fresh fruits and vegetables to WIC families. Although the provision of \$8 for fresh fruits and vegetables is a step in the right direction, the reality is that because these foods have substantially increased in price, the allotted amount does not purchase very much. Juice is not a necessity and from an educational point of view it can send the wrong message to families leading them to purchase more juice with their own money. I would like to see the savings accrued from the additional deletion of the juice remaining in the WIC food packet, to be applied to increase the dollar amount for more fruits and vegetables. This would not only help families eat healthier but it would reinforce our nutrition messages that we give them when counseling and teaching group sessions. Another change I would like to see is to dispense entirely with the commercial baby food that is being proposed for infants. Instead, I would like to see the savings appropriated to more fruits and vegetables. Providing commercially prepared baby foods sends a wrong message to parents that will lead them to buy these foods that are very expensive and not as nutritious as freshly prepared foods for their infants.

I would like to applaud you for your willingness to make these changes that will improve the health of WIC families and for the cultural relevance of the new foods added.

Sincerely,

RD, IBCLC



Countywide Services Agency

Department of
Health and Human Services

Primary Health Services
Keith Andrews, MD Division Chief

County of Sacramento

Terry Schutten, County Executive
Penelope Clarke, Agency Administrator
Lynn Frank, Interim Director
Deb Antley, Administrative Services

OCT 20 2006

LA-135

Sacramento County WIC Program
2251 Florin Road, Suite 100
Sacramento, CA 95822

October 5, 2006

Dear U.S. Department of Agriculture:

I am writing to let you know what I think of the proposed changes to the WIC (Women, Infants, and Children Supplemental Nutrition Program) food package.

I am highly in favor of the proposed changes. They more accurately reflect the current US Dietary Guidelines and are much healthier for our WIC clients. In particular, I am happy to see the addition of fresh fruits and vegetables to the package and the reduction of juice. This provides more nutrients and fiber and less sugar in the diet. I also support the addition of whole grains, soymilk, and tofu to the package. This offers better nutrition and more choices to our culturally diverse clientele.

We see over 26,600 clients a month in our WIC agency. Many of these clients are obese, some at a very early age. I have seen three-year-old children that weigh over 75 pounds. We don't help our clients when we give them so much high fat milk, cheese, and sugar (from the juice) that are contained in the current food package. The proposed food package will definitely be an improvement. I would prefer to see no fruit juice at all in the new package, and even more money for fruits and vegetables. The juice is not needed for vitamin C – that is prevalent in many foods and would be provided by the addition of fresh fruits and vegetables. Also, the juice gets children accustomed to drinking sweet beverages, which contributes to obesity over the lifetime of the child.

Hooray for the proposed WIC food package! Let's get it started – the sooner the better for our clients.

Yours truly,

, RD
WIC Clinic Supervisor



Countywide Services Agency

Department of
Health and Human Services

WIC Program
Teri Duarte, Director

Terry Schutten, County Executive
Penelope Clarke, Agency Administrator
Lynn Frank, Director

County of Sacramento

October 19, 2006

OCT 20 2006

LA-136

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

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

Dear Ms. Daniels:

I strongly support the USDA issued proposed rule governing the WIC Food Packages published in the Federal Register on August 7, 2006. The proposed food packages provide WIC participant with a wider variety of food choices, allow greater flexibility in accommodating participants' cultural food preferences, and address the nutritional needs of our nation's most vulnerable women, infants and children.

The most important changes in the food package are the reduction of juice quantities and the addition of fresh fruits and vegetables. There is no nutritional reason to include juice in a healthful diet. Juices provide a concentrated source of sugar and calories, both of which are overconsumed by this population of low-income women and children. Moreover, juices lack fiber, which is often lacking in the diets of this population. Those of us who have worked in WIC for a while are keenly aware of the contradictions between what our nutritional recommendations are and what the food package provides. It is frustrating to recommend to participants that they combat overweight by limiting their intake of juice, and then to find that the food package they receive provides juice in quantities significantly greater than the recommended amounts. The addition of fruits and vegetables to the food package is a tremendous improvement, as it will help to improve intake of fiber, Vitamins A and C, folate, and potassium in this population. However, \$8.00 for women and \$6.00 for children is not enough. I urge that the dollar amount be increased to as great an amount as possible. To make this suggestion cost-neutral, I suggest the complete elimination of juices. Participants could benefit by consuming more fruits and vegetables and plain water than the equivalent number of calories in the form of juice. If WIC nutrition counselors were supported by a food package that reflected those recommendations, their chances of influencing participants' eating patterns would be greatly increased.

Thank you for your work in promoting the development of the proposed rule. I urge USDA to finalize the rule by no later than the spring of 2007.

Sincerely,

, RD, MPH, Director
Sacramento County WIC Program

10-05-06

OCT 20 2006

LA-137

DEAR U.S. DEPARTMENT OF AGRICULTURE:

I AM WRITING TO TELL YOU WHAT I THINK ABOUT THE PROPOSAL TO CHANGE WIC FOODS

THE CHANGE THAT I LIKE THE MOST IS THAT WE ARE ADDING FRUITS AND VEGETABLES, BECAUSE NOW PARTICIPANTS WILL HAVE THE RESOURCES TO ATTAIN FOODS HIGH IN VITAMINS AND FIBER. INSTEAD OF JUST TELLING THEM TO BUY FRUITS AND VEGETABLES WE HELP THEM.

ALSO THE NEW APPROVED CANNED FISH, BEANS, WHOLE GRAINS. THIS REFLECTS THE BROAD SPECTRUM OF FOODS THAT ARE A PART OF EACH CULTURE'S DIET. TOFU IS PART OF SOME ASIAN CULTURES, TORTILLAS IS PART OF THE HISPANIC CULTURE, AND SO FORTH.

ALL OF THESE CHANGES WILL EDUCATE WIC PARTICIPANTS WHEN IT COMES TO HEALTHIER EATING. ALL OF THESE CHANGES WILL MAKE THE PARTICIPANTS REFLECT AND CONSIDER ALL FOOD OPTIONS.

THANK YOU FOR YOUR EFFORTS TO MAKE WIC FAMILIES HEALTHIER.

SINCERELY,

LA-136

OCT 20 2006

Dear US Department of Agriculture:

I am writing to tell you what I think about the proposal to change WIC foods. The changes that I like the most are that there will be fruits and vegetables and breads. The reason that I like these changes is that we are providing fresh foods and nutrients.

Thank you for your efforts to make WIC families healthier.

Sincerely,