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November 12, 2003

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

Dear Ms. Daniels:

Maternal and Family Health Services, Inc.(MFHS) has administered the WIC Program for the past 29 years, serving an average of 48,000 participants per month in sixteen counties of PA. Our population is both rural and urban with the predominant ethnic population white at 64.7%; followed by Hispanic at 24.8% and Black at 10.2 %. Asian/Pacific Islander/American Indian, make up the balance. MFHS nutrition staff submits the following comments on "Revisions to the WIC Food Packages" for your review.

MFHS supports the position of NAWD that the purpose of the WIC food prescription is to:

- help participants establish dietary patterns that promote life-long good nutritional health,
- provide the tools by which participants apply the nutrition knowledge gained from counseling and education to make dietary changes to improve their nutritional health; and
- provide a reliable source of supplemental food.

In response to concerns related to the alarming rate of obesity in the U.S., and in support of a culturally diverse food package to meet the nutritional needs of our population, we support the following food prescription recommendations:

- Offer additional choices of grain products. Food products should be low-sugar, low-fat, a good source of fiber and enriched with iron, folic acid, and B vitamins. This can include: whole grain bread, enriched rice, pasta, tortillas, or cornmeal.

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- Offer choices of fruits and vegetables - fresh, frozen, or canned, with year round availability. Include fruits and vegetables high in vitamin A, vitamin C, folic acid, B6, magnesium, fiber and antioxidants. This can include: carrots, citrus fruits, tomatoes, sweet potatoes, greens, or broccoli.
- Exclude juice from infant food package or reduce the total quantity of juice and prescribe it only when the infant is developmentally able to drink it from a cup.
- The maximum quantity of milk should be reduced for children and lower fat milks should be offered as the standard for all women and children over 2 years of age. Include other milk/calcium-rich food sources, such as tofu, soymilk, or unsweetened yogurt; offer low-fat cheese as a standard for women and children over the age of 2 years.
- Offer a choice of either canned or dried beans/peas to all women and children.
- Offer the opportunity for a food prescription which includes all WIC foods in combination with special formulas, designed to meet the needs of children and women participants.

The ideal WIC food prescription will reflect the recommendations of nutrition experts and will encourage an optimal nutrient intake. The foods will be culturally sensitive, low fat, nutrient-dense, rich in fiber, rich in vitamins and minerals and represent the major food groups of the USDA Food Guide Pyramid. These foods, in combination with nutrition education, will provide WIC participants with the tools needed to implement healthy lifestyles.

Sincerely,



Arlene Feleccia RD LDN CDE
Director of Nutrition

cc: Frank Maisano, PA WIC Division Director
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