

National Indian and Native American WIC Coalition

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December 12, 2003

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

Re: Revisions to the WIC Food Packages, 7 CFR Part 246

Dear Ms. Daniels:

Thank you for the opportunity to comment on Public Notice 7 CFR Part 246, Revisions to the WIC Food Packages. The National Indian and Native American WIC Coalition (NINAWC) support improvements in the WIC food package. We feel it is very important for the food package to reflect current nutrition science and offer foods that are accepted, enjoyed, and consumed by the participants we serve.

The WIC food packages and individual food prescriptions are valuable tools used by WIC nutrition counselors. These foods reinforce the nutrition message given during the WIC visit. The foods, because they are free, are an incentive helping us reach the at risk WIC eligible population. When the food package is out of step with dietary recommendations, the nutrition message is less believable. Or when the foods are not eaten or desired, the potential WIC participant may not find it beneficial to seek our services. If the nutrition message is ignored or the potential participant is not served, the entire mission of WIC is jeopardized.

The NINAWC believes the purpose of the WIC food prescription is to:

- help participants establish healthy life-long dietary patterns that promote good health;
- provide the tools by which participants can apply the nutrition knowledge gained from counseling and education to make dietary changes to improve their nutritional health; and

provide a reliable, culturally acceptable source of supplemental foods.

The current WIC food packages are now thirty-years-old. Over these years nutrition science and its relationship to achieve and maintain good health have evolved. Times have changed. The ethnicity and culture of WIC participants have especially changed over the last thirty years. The existing WIC food packages are neither consistent with current dietary guidelines, supportive of cultural needs, adaptable to demographic shifts, nor are they responsive to emerging health issues. Many WIC foods today are not culturally acceptable or physically tolerated. Food availability has also improved providing more choices of foods that fit current food recommendations.

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NINAWC members participated in the development and final report of two position papers by the National WIC Association (NWA). These two reports, "*NAWD WIC Food Prescription Recommendations*" and "*NWA Culturally Sensitive Food Prescription Recommendation*," published by the NWA in 2000 and 2003 respectively, address the emerging needs posed by the population WIC now serves. As members of NINAWC, we feel these reports offer good ideas, both practical and economical, which could be applied to future changes in the WIC food packages.

In considering changes to the food packages, NINAWC recommends that:

make WIC food packages consistent and compatible with dietary recommendations in the U.S. Dietary Guidelines for Americans with food quantities and portion sizes that address the nutritional needs of the participants;

modify the current standard food packages to provide a minimum of 65% of the RDA for the WIC target nutrients, including folic acid;

set the nutrient content of food prescriptions as the basis for allowable tailoring, and not be limited to food-for-food substitutions;

give flexibility to all states to allow use of a wide variety of alternative foods to replace standard food packages, selecting foods based on regional availability, participant preferences, cultural acceptability, cost and administrative feasibility; and

- base the cost neutrality of food package changes on the overall cost of **all** food packages, rather than on package-for-package comparisons.

In closing, as program directors, nutrition counselors and WIC participants, in some instances, the NINAWC hopes USDA will take this opportunity, consider our suggestions, and make changes to the WIC food package a reality. After all, when the food package is out of step with dietary recommendations or when the foods are not accepted, the success of nutrition education and WIC's is at risk. Please know that the members of NINAWC are willing and ready to help facilitate changes to the WIC food package in order to best serve and promote good nutrition to the very special population we serve.

Sincerely,



Teresa Bryant

Chair

National Indian and Native American WIC Coalition