

GP-1

Sent Tuesday, August 08, 2006 11:23 PM

To: WICHQ-SFPD

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

To whom it may concern

I am writing to voice my support of the proposed changes to the WIC program. My family received WIC vouchers for about a year while my son was a baby. The introduction of better quality foods such as fresh produce and soy products would encourage healthy eating habits for mothers and children alike. Many breastfeeding moms cannot consume dairy because the cow's milk proteins that are passed on can be difficult for their babies to digest. Soy milk and tofu would provide healthy calcium and protein alternatives for these moms, and may make it possible for them to nurse their babies longer. The farmer's market program is great, but it is unavailable in so many areas. I think this is unfortunate because not only does it provide healthy foods for the WIC recipients, but it also supports local farmers and their families.

We've seen a great deal of improvement in the amounts and availability of breastfeeding support in WIC offices. Breastfeeding peer counselors, group meetings, etc. But WIC has a long way to go before it can truly say it is supporting nursing mothers and their families. Roughly 50% of all infant formula bought in the U.S. is purchased with WIC dollars. What kind of message does this really send? I look forward to seeing some reforms in the WIC program.

Thank you so much for listening to my comments.

GP-2

Sent Wednesday, August 16, 2006 3:29 PM

To: WICHQ-SFPD

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

Bravo to the USDA for making a statement regarding the value of fruits, vegetables and whole grains in the diets of Americans, specifically those on the WIC program. I am a science teacher and have taught community health classes, and was on WIC myself at the birth of my second child. I heartily believe that the benefits of fruits and veggies with their vitamin, mineral and phytochemical make-up must become part of our daily diets to resist disease and maintain a healthy weight. I believe that by including these healthy elements in the WIC diet, we will be training young mothers and their children to make wise choices for years to come. Although you may receive resistance from certain corners of the agricultural community, I thank you for taking a stand for healthy diets.

GP-3

From WebMaster@fns.usda.gov
Sent Wednesday, August 16, 2006 10:48 PM
To WICHQ-SFPD
Subject: Revisions to WIC Food Packages - Proposed Rule

CITY boulder
STATE CO
ORGANIZATION
CATEGORY GeneralPublic
OtherCategory
Date August 16, 2006
Time 10:47:43 PM

COMMENTS

I definitely think the WIC program should include more fresh fruits and vegetables, beans, and milk alternatives

GP-4

From WebMaster@fns.usda.gov
Sent Wednesday, August 16, 2006 11:17 PM
To WICHQ-SFPD
Subject: Revisions to WIC Food Packages - Proposed Rule

CITY Kennebunk
STATE ME
ORGANIZATION
CATEGORY GeneralPublic
OtherCategory
Date August 16, 2006
Time 11:17:06 PM

COMMENTS

These changes are long overdue. The primary goal of this program should be nutrition, not subsidizing agri-business. Thank you.

GP-5

From WebMaster@fns.usda.gov
Sent Thursday, August 17, 2006 9:28 AM
To WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY Baltimore
STATE Maryland
ORGANIZATION
CATEGORY GeneralPublic
OtherCategory
Date August 17, 2006
Time 09:27:45 AM

COMMENTS

Bravo on the rule changes to allow milk alternatives, more fresh fruits and vegetables. A nice way to encourage new generations of food consumers to eat better and healthier. Anything you can do to continue encouraging WIC participants to buy from local farmers and to encourage local farmers to support WIC participants will also be fabulous - and will support many many more people this way.

GP-6

Sent Thursday, August 17, 2006 10 52 AM
To WICHQ-SFPD
Subject Docket ID Number 0584-AD77

I am in favor of updating the food packages provided to participants in accord with the American Academy of Pediatrics guidelines

Hamilton MI 49419

GP-7

Sent Thursday, August 17, 2006 11:35 AM
To: WICHQ-SFPD
Subject: [Docket No: RIN-0584-AD77],[FR Doc: 06-06627],[Page 44783-44855], Child nutritio

This letter is to comment on the proposed changes. It is my understanding that the rule changes will include soy-based alternatives to dairy products.

Given the goals of the WIC program, I am surprised that is being considered for four main reasons:

First, while nutrition label values may be the same, the availability of nutrients in soy-based products does not measure up to that of traditional dairy products.

Second, soy-based alternatives I see in the grocery store are more expensive than lowfat milk. When WIC recipients "graduate" from the program, the intent is to have given them a diet they can afford to continue.

Third, in light of the obesity crisis, there is evidence that lowfat milk and dairy products aid the weight loss process. All researchers do not agree, but it is a finding worth consideration.

Fourth, with regard to a desire to provide options for diverse populations, if I cannot afford diverse options in my diet because of my income level, why should my tax dollars give someone else that opportunity? There ought to be higher priorities for spending.

Sincerely,
Watertown, WI

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GP-8

AUG 18 2006

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

From :

[REDACTED]
Fredericksburg, VA 22407

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

Dear Ms. Daniels,

I believe that most of the proposed changes to the food packages are excellent. I especially applaud the substitution of fruits for fruit juices. Families have gone too juice-crazy for their children in recent years. But I would strongly encourage one tweak to the ^{proposed} "Food Package IV" to allow 3 rather than 2 cups of milk per day for children. This would allow cereal + milk for breakfast, plus a glass of milk to accompany lunch and dinner. I know dairy products have come under scrutiny with the prevalence of childhood obesity, but let's place the blame properly on junk foods + sodas, not on milk. In any case, the new 2% fat restriction addresses that.

Thanks for your consideration.

[REDACTED]
Aug. 18, 2006

GP= 9

Sent Friday, August 18, 2006 9 05 AM

To WICHQ-SFPD

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

TO whom it may concern,

I am writing in support of the USDA's proposed modification of WIC policy to allow increased produce expenses to be used at farmers' markets. We all know the importance of vegetables and fruit in the diet, particularly during childhood development and as the cornerstone to healthy dietary habits that combat obesity. Though I think the amount is woefully small and hope it can be increased in the future, I think this is a vital step, and it is especially good that it's extended to farmers markets. Not only are locally grown foods much fresher and consistently picked in a more advanced state of ripeness, ensuring higher nutritional value, but it's government money spent to help with two issues with one check. Smaller American farms, the kind that typically sells at markets, have a difficult time getting by because of real estate values and competition from very large agricultural operations. Markets mean survival for many, and allowing WIC vouchers to join the cash of better-off customers all adds up to the preservation of American family farms and agricultural land, which in turn is good for all of us.

Thank you,

GP-10

Sent Friday, August 18, 2006 9:37 AM
To: WICHQ-WEB
Subject: Changes to WIC food package

It is my understanding that you propose to trim the women's and children's produce budget to \$6 a month ? a \$2 reduction ? so that the government can save \$1.3 billion over the next five years.

In my opinion, skimming \$2 off the top of the fresh fruit and vegetables budget disregards the Institute of Medicine's best judgment. It elevates bookkeeping over common sense.

You should not let an excellent plan for the program be undermined for minuscule savings.

If it takes an apple a day to keep the doctor away, for heaven's sake, they should give needy moms and kids the whole apple.

Springfield, OH 45504

GP-11

Sent Tuesday, August 08, 2006 11 22 AM

To WICHQ-SFPD

Subject Docket ID Number 0584-AD77 WIC Food Packages Rule

To Patricia,

I think changing the WIC packages are a great idea
That might help out our economy and the childrens diet a little

I read in the paper that you do not have to be a citizens to be eligible for the WIC program . but shouldn't those who get WIC at least be legal here in USA?

With the old pkgs WIC supplied Eggs, Milk, Cheese, Juices, Cereal, Fruits and everything else for the whole family including the spouse and other siblings I have seen it first hand

I'm glad to hear that the pkgs will be changed and or reduced But they should try and push to where we stop it all together for those who are here illegally
It's not fair for those of us born and raised here to be refused by WIC .like I was many years ago

Thank you for your time

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GP-12

From WebMaster@fns.usda.gov
Sent Friday, August 18, 2006 10:39 PM
To WICHQ-SFPD
Subject RevisionstoWICFoodPackages-Proposed Rule

CITY Naples
STATE NY
ORGANIZATION N/A
CATEGORY GeneralPublic
OtherCategory
Date August 18, 2006
Time 10:39:05 PM

COMMENTS

I have twice participated in the WIC program in two different states. I really appreciated the farmers market checks that allowed me to buy fresh fruits and vegetables from local farmers. I often lamented that more was not done to help purchase such items. Especially since the nutrition classes encouraged this. I think all participants in the WIC program would benefit from this proposal. Especially, since they are already being educated on how to select ripe fruits and vegetables and how to use them in a variety of recipes. This country has an ongoing problem with obesity from eating the wrong kinds of foods. If this proposal is elected it can only serve to enrich the lives of the women and children and unborn infants it serves to nourish.

GP-13

From WebMaster@fns.usda.gov
Sent Saturday, August 19, 2006 10:11 AM
To WICHQ-SFPD
Subject: Revisions to WIC Food Packages - Proposed Rule

CITY Brooklyn
STATE NY
ORGANIZATION
CATEGORY GeneralPublic
OtherCategory
Date August 19, 2006
Time 10:10:34 AM

COMMENTS

I agree with the proposed change to the WIC rules. I live in New York City, and I can see firsthand the lack of healthy food options in many low-income neighborhoods. As the wisdom about well-balanced diets changes, the type of food that people receiving government assistance get must also change. Providing access to fresh food with WIC is a necessary step towards improving people's health.

GP-14

Sent Sunday, August 20, 2006 3:55 AM

To: WICHQ-SFPD

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

Patricia N. Daniels

Director

Supplemental Food Programs Division

Food and Nutrition Service

USDA

Dear Ms. Daniels –

I am writing to give my enthusiastic support for the USDA's proposed dietary change to the WIC program which would allow eligible mothers and children to receive more fresh fruit and vegetables, milk-alternatives, whole grains, and legumes while reducing reliance on eggs and fruit juices. While I think it is shameful that we have waited this long to encourage and allow the purchase of fresh fruits and vegetables in WIC guidelines, I wholeheartedly say, "Better late than never."

In addition to the many health benefits from these changes, I also applaud the aspects of the proposal which will make the WIC program more user friendly and, ultimately, more successful. As I understand it, the changes would include revamping the WIC food packages to better align with the 2005 Dietary Guidelines for Americans and current infant feeding practice guidelines of the American Academy of Pediatrics, assistance for successful long-term breastfeeding, provisions allowing WIC State agencies greater flexibility in prescribing food packages to accommodate participants with cultural food preferences, and more improved dietary management choices for medically fragile participants.

In brief, kudos on this sweeping proposal based on the most recent science. The health and success of our future generations literally depends on this program.

Minneapolis, MN 55417

GP-15

Sent Monday, August 21, 2006 3:40 AM

To: WICHQ-SFPD

Cc: Whitford, Debbie

Subject: Docket ID Number 0584-AD77, Women, Infant & Children (WIC) Food Packages Rule

August 20, 2006

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

Subject: Revisions in the WIC Food Packages - "Docket ID # 0584-AD77
WIC Food Packages Rule"

As you are aware, there has been an increase in Adult 2 diabetes in our children. Poor eating habits will lead to chronic disease at a very early age.

I would like to make two recommendations that I believe will help our infants and children lead healthier lives.

Recommendation #1

The USDA must take an immediate stand to work with legislators to pass laws to stop the sale and use of non-organic baby formulas. In addition, the WIC program must implement, in their program, the distribution of organic baby formulas only. The cost should not be a consideration when it comes to the health of our infants and children. My research indicates that the leading brands of baby formulas contain over 50% of corn syrup solids (a form of sugar) and sugar. Read the attached copy of a Similac Isomil Advance Soy Formula label that I will send to you with a hard copy of this letter. Similac Isomil Advance Soy Formula has 43.2% corn syrup solids (which is a form of sugar) and 10.3% Sugar (Sucrose) and other chemicals that are toxic to the body. This means our infants that are on baby formula start their life with too much sugar. Then when school age they begin to drink carbonated soft drinks, candy and other unhealthy foods sold at the schools. This leads to Adult 2 Diabetes in our children and other chronic diseases.

I would like to share a personal story about my grandson and Similac. When he was first born I was caring for him while my daughter worked. I noticed he didn't ever look good and he slept a lot. In addition, he had constant diarrhea, spitting

up of his formula, rashes on his legs, and his stomach was swollen like the little children that are starving in Africa. When I looked on the label of the Similac Formula I was shocked to see the amount of sugar and other chemicals that were in the formula. I immediately went to the health food store and bought an organic formula. Within 3-4 days all of the symptoms I mentioned above were going away. He had energy after drinking a bottle instead of falling asleep, his stools became harder, he didn't spit up his formula like he used to, his rashes began to disappear and his stomach swelling went down. I couldn't believe the improvement in him in just 3-4 days. The bad news is that my daughter put him back on the Similac, partly, because the organic formula was not available in the supermarkets she regularly shopped. Unfortunately, his symptoms reoccurred. I checked with at least two large chain stores in the Sacramento area and they did not offer organic baby formula.

The WIC Program can set an example by changing from non-organic baby formula and foods to organic. This will also help to educate the new mothers about the importance of healthy organic foods for good nutrition for themselves and their children.

Recommendation #2

The USDA should take an immediate stand to work with legislators to pass laws to require schools to replace carbonated sodas, of any type, with organic soy protein drinks that have vitamins, minerals and protein.

These carbonated sodas are made of sugar, sodium (salt), and have carbon dioxide gases that I believe are even more of a health hazard than the sugar and sodium. In addition, diet sodas contain Aspartame which is toxic to the body and is known to cause weight gain and other chronic health conditions.

With all the single-working parents in our society, many of the children do not get one healthy meal a day. If these protein drinks were provided, they may have a positive impact on the health of our children. I also believe that these healthy organic protein drinks could lead to better learning and memory for our children and the standard of their education would be improved because they would be healthier and learning would become easier.

With all of the toxic chemicals in the air, water, food and body products we use, the organs of the body (like our intestines) become inflamed and the absorption of the nutrients from the foods our children eat is diminished. The organic protein drinks would help replace what is missing in their diet.

I hope you will take these recommendations to heart.

Sincerely,

cc Debra Whitford, Chief, Policy & Program Development Branch

GP-16

Sent Tuesday, August 22, 2006 3 16 PM

To WICHQ-SFPD

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

I am delighted to see that the WIC program is being revised to meet the changing needs of our society. I don't fully understand why it took so many years to make these changes, but nevertheless, they are welcomed! I love the addition of fruits and vegetables, but am sad to see some decreases in the allowances for cheese and egg. I would like to add also, that it would be nice if WIC allowed some "extras" for mothers who breastfeed their children beyond the age of 1, just as there are "extras" for mothers who breastfeed under 1 year.

I hope that these changes take effect sooner rather than later, for the sake of the population that WIC is trying to reach.

Many thanks,

Houston Texas 77005

GP-17

Sent Sunday, August 27, 2006 2:29 PM

To: WICHQ-SFPD

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

To Whom it May Concern,

I am writing to express my support for the Revisions in the WIC Food Packet Proposed Rule for the Special Supplemental Nutrition Program for Women, Infants and Children. The US is plagued by an epidemic of adult and childhood obesity that is fueled by misleading advertisements for unhealthy foods, the processed food industry, and poor education and health systems. As such, programs that encourage the consumption of more fruits, vegetables, and proteins are necessary to promote a stronger and healthier generation of Americans. Please revise the WIC Food Packets to be in accordance with this proposed rule. Thank you.

Sincerely,
Concord, CA

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GP-18

From WebMaster@fns.usda.gov
Sent Monday, August 28, 2006 5:35 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY Burlington
STATE WA
ORGANIZATION Personal
CATEGORY Other
OtherCategory Former Recipient
Date August 28, 2006
Time 05:34:47 PM

COMMENTS

I firmly believe this program needs to leave the amount of formula and milk etc alone. I was medically unable to breast feed and know just how expensive formula is- how could a family afford more expense on formula if they are already on assistance? Totally absurd notion if you ask me. Pay for the items that are the most expensive- that's what's needed.

GP-21

Sent Wednesday, August 30, 2006 2:45 PM

To: WICHQ-SFPD

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

The changes to the WIC food packages are long overdue, so these changes are a very good idea. Children get too much juice, and by offering fruits and vegetables instead, we reduce their chances of obesity. Whole grains help control weight, and improve digestion. Offering baby foods is also helpful to WIC clients. These changes are a great idea!

GP-22

Sent Wednesday, August 30, 2006 3:39 PM

To: WICHQ-SFPD

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

Dear FNS people,

I'm writing to say THANK YOU a thousand times for your proposal to add fresh fruits and vegetables, soy milk and tofu as dairy alternatives, and whole grains to the WIC food list. This is TREMENDOUS! --and is very close to what the Institute of Medicine recommended as part of their exhaustive review of WIC foods in 2005.

I was a WIC mom in California many years ago when the program was brand new, and my daughter and granddaughter were on WIC in the early '90s. I worked for WIC for five years from 1999 to 2005. During all of that time the WIC food list remained unchanged and unresponsive to client requests for additional foods, the changing WIC population, new health challenges that didn't exist when the program was created 30+ years ago, and new nutrition science --despite considerable effort on the part of WIC staff and advocates. The changes you're proposing go a long way toward bringing the WIC food list into the 21st century and serving WIC clients better, recognizing that the world is very different now and that the WIC workforce needs new tools to meet WIC families' needs.

From the legions of us who have been asking and pleading and writing to you for years about the need for changes to the WIC food list, thank you. Thank you THANK YOU for hearing us at last! At the close of this comment period, I hope you'll move post haste to implement these changes --it can't be soon enough for WIC families!

With much gratitude,

Tumwater, WA 98501

GP-23

Sent Friday, September 01, 2006 11:34 AM

To: WICHQ-SFPD

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

To whom it may concern,

I am writing to express my strong support of the proposal to include more money for fresh fruit and vegetables in the WIC program, and to allow recipients to purchase them at farmers' markets. Fresh whole fruits and vegetables provide combinations of a variety of vitamins, minerals, enzymes, antioxidants, and other beneficial nutrients that cannot be found in other food sources. Locally-grown produce, especially organic, has been demonstrated to be even richer in such nutrients and reduces our country's reliance on foreign fossil fuels.

The new proposal would not only benefit the lives of children and the mothers, but also American farmers and the nation as a whole.

Sincerely,
Greenfield, MA

GP-24

From WebMaster@fns.usda.gov
Sent Saturday, September 02, 2006 9:05 AM
To WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY Allentown
STATE PA
ORGANIZATION
CATEGORY Other
OtherCategory Student
Date. September 02, 2006
Time 09:04:58 AM

COMMENTS

I was pleased to see the increased foods now available to WIC mothers, including whole grains, fruits and vegetables, and tuna fish. This change synchronizes the WIC program with the Dietary Guidelines for Americans and with the new Food Guide Pyramid. Hopefully, this will make nutrition seem more approachable and consistent to the average American. I was also pleased to see that alternatives including corn tortillas and soy products would now be available to reflect our cultural sensitivity. I realize that cost neutrality was of great concern, but I was somewhat dismayed by the reduction of milk available to children 1-5 years old. I only fear that the space provided by the reduction of juice (not being filled by the lesser amount of milk available), will be now filled with soda. Overall, I was quite pleased to see the up-dates to the WIC program. Thanks!

GP-25

From WebMaster@fns.usda.gov
Sent Saturday, September 02, 2006 1:28 PM
To WICHQ-SFPD
Subject RevisionstoWICFoodPackages-Proposed Rule

CITY Allentown
STATE PA
ORGANIZATION Student
CATEGORY
OtherCategory Nutrition Student
Date September 02, 2006
Time 01:27:38 PM

COMMENTS

There have been some good changes in the WIC food packages. Increase of fruits and vegetables, eliminating juices from infants, adding whole grains and infant meat. I am glad to know that these improvements can be made without any changes in costs. Alternatives to milk such as soymilk or tofu have been provided. I also think there should be an alternative other than dried beans for children who are allergic to peanut butter. I also noticed that they have been promoting and supporting breast-feeding. Cash-Value voucher would also be included, which would make purchase of fresh fruits and vegetables more feasible. Overall, I am happy with the changes that have been proposed.

GP-26

Sent Saturday, September 02, 2006 8:37 PM

To: WICHQ-SFPD

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

With the Revisions in the WIC Food Packages- Proposed Rule, the nutritional needs of the target population are better addressed by including foods that are rich in the five nutrients that the WIC participants' diets were often lacking. WIC further made accommodations for participants from varied backgrounds and income levels so that all WIC participants could receive a variety of food that promotes health as defined by the American Academy of Pediatrics. I think that the revisions that WIC made are important since they address different aspects of the WIC Food Packages that were previously lacking.

GP-27

Sent Sunday, September 03, 2006 3:35 PM

To: WICHQ-SFPD

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

We received WIC for our children from 1999 until 2005. We were appalled at the amount of juice pushed in the packages. While our pediatrician and others were advising limited juice intake and we were trying to help our child develop a taste for healthy beverages such as milk, water and orange juice, we were continually bombarded with high sugar low nutrient juices such as apple and grape.

I support the reduction of juice in the packages, as well as limiting the availability of whole milk due to its fat content. I support allowing the purchase of some fresh fruits and vegetables.

Thank you,

Cedar Rapids, IOWA 52403

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GP-28

Sent Tuesday, September 05, 2006 3 51 PM

To WICHQ-SFPD

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

I agree that that it is time for the WIC Food Packages to be updated as the current standards were set in 1974. I would suggest the food packages be updated every 15 years. I am pleased to see that infant food packages would contain more fruits and vegetables as opposed to fruit juices, which are higher in sugar. Additionally, the suggestion for more whole grains to be included in the diet is seen as an improvement on the current food packages. Also, persons benefiting from the WIC program are encouraged to purchase 2% milk as opposed to whole milk, reducing the saturated fat content of their diet. For the future I would suggest also adding yogurt to the "Milk and Milk Alternatives" category.

In addition, I see the addition of more fish products as a complement to the food packages. Hopefully it will not take another 32 years for the food packages to be updated again, seeing how the American diet is continually changing.

GP-29

Sent Tuesday, September 05, 2006 7 19 PM

To WICHQ-SFPD

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

It is refreshing to see that there have been changes made to the WIC program. These changes seem well thought-out and appropriate in a time of changing dietary concerns and needs. By adding more fruits, soy and whole grains to the list of food options there will be an increase in the purchasing of these items therefore allowing families that are on difficult budgets to still eat appropriately and in a healthy manner.

By giving women and their children healthier options you are showing that their health is still important and that their health is not a second tier priority. These changes will effect the way in which the children choose to eat and will possibly result in lower numbers of childhood obesity due to healthy options being more readily available to this target community. Overall by changing the food options for these families, there will be a better balance of nutrients and more variety in the foods consumed which will allow for a potentially healthier diet.

Thank you for your hard work

Dakota
COUNTY

AUG 23 2006

Aug 22, 2006
GP-32

1849
Patricia N. Daniels, Director
Supplemental Food Programs
Food & Nutrition Service
USDA, 3101 Park Center Dr. # 528
Alexandria, VA 22302

Dear Ms. Daniels.

I wish to offer my thoughts
towards a decision to upgrade
with fruits & vegetables. I am
very much for this addition.
Each food program that the US
Government supports would be
better (healthier) with more fruits
& vegetables. I understand WIC
is in the planning stages for
this improvement. I've heard from
Emily on the Rosebud Reservation that
a big & positive difference fruits &
vegetables has been to them through
commodities.

Please go forward.
Sincerely,

- GP=34 -

From WebMaster@fns.usda.gov
Sent Wednesday, September 06, 2006 1:56 PM
To WICHQ-SFPD
Subject: Revisions to WIC Food Packages - Proposed Rule

CITY Redding
STATE CA
ORGANIZATION
CATEGORY GeneralPublic
OtherCategory
Date September 06, 2006
Time 01:56:05 PM

COMMENTS

Great new additions to WIC. I'm pleased this has been revised to include fresh fruits and veggies. Now if we could just look at what's purchased with food stamps and have stricter guidelines, more like WIC. No junk food should be purchased with food stamps!!

GP-35

From WebMaster@fns.usda.gov
Sent Wednesday, September 06, 2006 4:26 PM
To WICHQ-SFPD
Subject: Revisions to WIC Food Packages - Proposed Rule

CITY Los Gatos
STATE CA
ORGANIZATION
CATEGORY GeneralPublic
OtherCategory
Date September 06, 2006
Time 04:25:30 PM

COMMENTS

I strongly urge that the new Proposed Rule be implemented for the sake of a good healthy start for our young children in the WIC program

GP-36

From WebMaster@fns.usda.gov
Sent Sunday, September 10, 2006 2:12 PM
To WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY Easton
STATE PA
ORGANIZATION Cedar Crest College Nutrition Program
CATEGORY Other
OtherCategory Dietetic Student
Date September 10, 2006
Time 02:11:59 PM

COMMENTS

It is great to see the WIC program revise many of its food choices to promote a healthier diet in our infants and toddlers. Some positive changes noted are the elimination of juice at a very early age and adding vouchers to increase food and vegetable intake as well as increasing whole grain intake while reducing sodium and fat content. A note of concern is the reduction of milk to make way for substitutions such as soy and tofu. While these are healthy and beneficial products I am wondering what percentage of the WIC participants actually consume these products or are educated on these products, or are familiar with these products as much as they may be with milk? Also, with the reduction of milk and the elimination of juice will parents start substituting their child's thirst with soda?

Along with these changes, I do hope WIC will actively pursue to educate all of their participants on the advantages of the new policy by providing nutrition education on the benefits of fruits, vegetables, and whole grains as well as substitution products such as soy and tofu.

Thank You,

Cedar Crest College
Allentown, PA

GP-37

From WebMaster@fns.usda.gov
Sent Sunday, September 10, 2006 9:27 PM
To WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY Catasauqua
STATE PA
ORGANIZATION Nutrition Student
CATEGORY Other
OtherCategory Nutrition Student
Date September 10, 2006
Time 09:27:29 PM

COMMENTS

I think that the changes proposed for WIC are all positive changes. Adding fruits, vegetables, and whole grains to the list of foods offered will help the families achieve a more balanced diet and meet their nutrient needs. Though WIC is considered a supplemental program and is not meant to provide all foods needed, most participants would otherwise not be able to afford the more healthy foods such as fruits and vegetables. The new proposal also leads to a reduction of total fat, saturated fat, sodium, and cholesterol when compared to the old plan. This is a good plan since fatty, high sodium foods play a major role in the weight and health problems of today's population. It is also good that WIC considered the fact that fruit and vegetables can spoil easy, and therefore are going to issue smaller denominations for the vouchers. This way participants can purchase the fruits and vegetables a little at a time to avoid spoilage. Allowing Farmers markets to accept WIC is another wonderful idea, since it will allow participants more choices to purchase produce, and will also help support local farms.

With the addition of these new items, some things are also going to be reduced. Juice will be removed for infants under 1 and will be reduced for children ages 1 thru 5. I do not see an issue with this since the children will be getting their nutrients from the fruits and vegetables that they now eat. Also, eating a piece of fruit will likely be more satisfying to them than a glass of juice. This may help decrease children's tendency to overeat. I also think it is great that there will be a requirement that the juice is 100% juice in order to qualify for the WIC plan. Too many parents purchase juice drinks that contain little or no fruit juice and a ton of sugar.

I am a little concerned with the decrease in dairy products. Milk is very important for growing children. Decreasing the amount of milk may be harmful, especially

since some other dairy products such as cheese are also going to be decreased
But I am pleased to see that other non-milk options such as soy milk and tofu are
being added. This will give people who do not like or can't tolerate milk another
option.

Along with all of these changes, I hope that a lot of education will be provided for
the participants. In particular, I hope that WIC discusses the negative impact of
sodas and other high sugar drinks on children. My concern is that the children
may start substituting soda for the juice drinks that they are getting less of (and
also the milk they are getting less of). So it is very important to educate them on
healthy drink options.

GP-39

Proposed changes to WIC

Sent Tuesday, September 12, 2006 10:14 PM

To: WICHQ-WEB

Subject: Proposed changes to WIC

The proposed changes to the Women, Infants, and Children (WIC) supplement package should be adopted and put into action as soon as possible. These changes will provide a more nutritious diet to WIC recipients at a cost equal to the current program. One proposed change is to no longer offer vouchers for juice to children less than six months of age. This is a positive step for several reasons:

One of the main thrusts of the revised WIC program is to encourage new mothers to exclusively breastfeed for the first six months of the baby's life, discouraging the introduction of fruit juice to infants. Adding juice to an infant's diet prior to six months of age only provides empty calories to the baby and discourages them from drinking the far more nutritious breast milk. The American Academy of Pediatrics (AAP) released a statement that "fruit juice offers no nutritional benefits for infants younger than six months" (2001). In addition, the sugars in fruit juice can cause severe tooth decay, especially when given in a bottle.

In a study published in *Pediatrics*, Melanie Smith and Fima Lifshitz concluded that excess fruit juice consumption can contribute to failure to thrive in otherwise healthy children, ages 14-27 months (1994). While 100% fruit juice can be a healthy part of a child's diet, the intake must be limited and whole fruits should be encouraged as a wiser alternative. By taking proactive steps to limit the amount of juice in a child's diet and encourage the consumption of whole fruits and vegetables instead, WIC is taking a positive step forward to help encourage healthy eating in children across the country.

American Academy of Pediatrics (2001, May 7). News release: AAP warns parents and pediatricians that fruit juice is not always the healthiest choice. Retrieved Sept 12, 2006 from the American Academy of Pediatrics web site: <http://www.aap.org/advocacy/archives/mayjuice.htm>

Smith, M. & Lifshitz, F. (1994, March 3). Excess fruit juice consumption as a contributing factor in nonorganic failure to thrive [Electronic version]. *Pediatrics* 93(3), 438-443. Retrieved Sept 12, 2006, from Ebscohost database

GP-40

From WebMaster@fns.usda.gov
Sent Wednesday, September 13, 2006 2:30 PM
To WICHQ-SFPD
Subject RevisionstoWICFoodPackages-Proposed Rule

CITY Barto
STATE PA
ORGANIZATION Cedar Crest College
CATEGORY Other
OtherCategory Community Nutrition Student
Date September 13, 2006
Time 02:30:19 PM

COMMENTS

Bravo to the Committee for following the recommendations of the American Academy of Pediatrics regarding juice consumption. By recognizing the benefits of whole fruits and vegetables over juice for toddlers, the committee has not only added fiber to the toddler's diet, but also reduced the extra sugar often implicated in childhood overweight and poor dental health of baby teeth.

Also I am interested in seeing how the committee resolves the issue of cash value vouchers for fresh fruits & vegetables.

GP-41

From
Sent Wednesday, September 13, 2006 6:06 PM
To: WICHQ-SFPD
Subject: WIC food package rule

To Whom It May Concern,

As the foster parent of a toddler with failure to thrive and dairy allergies I am glad to hear/read that the WIC packages may be changing. I see it has been proposed that alternatives to dairy be offered. Thank you. Also, please consider that for toddlers significantly under weight there has not been a nondairy toddler formula offered through WIC. My family has paid out of pocket (not reimbursed by the county) for a soy nutritional supplement (Bright Beginnings Soy Pediatric Formula) recommended by a registered dietitian to help this child gain weight. WIC had nothing to offer us for this child. We had the financial means to provide for him, but what about the families that don't. Children with dairy allergies (the #1 allergy I have been told) need appropriate alternatives. Thank you for considering the needs of children with food allergies.

Foster Parent

From WebMaster@fns.usda.gov
Sent Friday, September 15, 2006 1:53 PM
To WICHQ-SFPD
Subject: Revisions to WIC Food Packages-Proposed Rule

CITY Long Beach
STATE California
ORGANIZATION California State University, Long Beach
CATEGORY
OtherCategory
Date September 15, 2006
Time 01:52:48 PM

COMMENTS

Dear Friends at US Department of Agriculture,

I think the new food package is much better than the old one. The most important thing is that fruits and veggies are being added to the package. Besides, more food choices are available and so participants can have more flexibility in adjusting their diet and make it nutritious for the family.

Thanks for reading my comments

Sincerely,

Student Dietitian

GP-44

From

Sent Monday, September 18, 2006 10:37 AM

To WICHQ-SFPD

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

I approve of all changes made and would like to see them come into effect

GP-45

From

Sent Tuesday, September 19, 2006 8:52 AM

To WICHQ-SFPD

Subject Docket ID Number 0584-AD77 Wic Food Packages Rule

To whom it may concern, I previously spent time participating in the Wic Food Services Program. There were days that I did not know how I would have been able to provide such healthy food to my children without this program. I agree that the persons on this program get plenty of milk, eggs and cheese. I agree that you should give less of this and more of the fruits and vegetables. My concern is that you should look at how much cereal these persons obtain and perhaps give either breads or crackers in exchange for some of this. You give persons so much cereal that they quite literally are giving it to their friends, their families and so forth. I know with three children there was no way to eat that much cereal in a month. Just a thought. Thanks.

GP-47

Sent Wednesday, September 20, 2006 4:33 PM
To: WICHQ-SFPD
Subject: Proposed improvements in WIC

Dear Ms. Daniels,

I strongly support changes in the WIC GUIDELINES which would enable women and children to purchase more fresh fruits and vegetables. Nothing could be more important for general health and happiness than eating fresh and hopefully organic produce.

Thank you for your attention.

Sincerely,

Chiff, NM 88028

GP-79

Sent Wednesday, September 27, 2006 1:36 PM

To: wichq-sfpd@fns.usda.gov

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

To whom it may concern,

The new WIC Food package needs to be approved and implemented! This is a wonderful change that has the ability to make a difference in many women and children's lives. As a graduate student in Foods, Nutrition and Dietetics, I strongly support the efforts, knowledge, and changes behind the new food packages. Having worked as a nutritionist at a WIC clinic, I believe the importance of fruit and vegetable consumption among children and women to be an important part of nutrition education. The dietary guidelines and Food Guide Pyramid for all Americans two years of age and older stress the consumption of fruits, vegetables, and whole grains. Also a decrease in the consumption of milk, eggs, cheese and juice is a crucial part of dietary recommendations for children. Older children and adults should be encouraged to drink low fat milk to help combat the ever growing obesity trends across America. Hopefully more women will breastfeed if less infant formula is offered in food packages. This would be a positive change and trend for women and babies. Additionally, through the new food packages, children can be encouraged to eat more nutritious whole and fresh fruits instead of too much fruit juice.

In order to work together towards a healthier population and healthier lifestyle among people in this country, we need this proposal to be implemented now!

Thank you for your time,

GP-80

From WebMaster@fns.usda.gov
Sent Wednesday, September 27, 2006 1 43 PM
To WICHQ-SFPD
Subject RevisionstoWICFoodPackages-Proposed Rule

CITY Milford
STATE PA
ORGANIZATION
CATEGORY GeneralPublic
OtherCategory
Date September 27, 2006
Time 01 43 09 PM

COMMENTS

PLEASE make fresh fruits and vegetables available to the women and PLEASE reduce the amount of animal products available--a diet rich in fruits and vegetables will allow the children a chance at good health and will benefit America greatly!

GP-81

From WebMaster@fns.usda.gov
Sent Wednesday, September 27, 2006 2:49 PM
To WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY Chesapeake
STATE VA
ORGANIZATION
CATEGORY GeneralPublic
OtherCategory
Date September 27, 2006
Time 02:49:28 PM

COMMENTS

I think it is wonderful that fresh fruits, vegetables, soymilk, and tofu will be added to the WIC program. The reduction in the allotment for the dairy and egg products is another wonderful proposal as these items are full of fat and cholesterol. Not to mention that the new dairy substitute and tofu address those with dietary restrictions due to religious, moral, or health reasons.

GP-82

From WebMaster@fns.usda.gov
Sent Thursday, September 28, 2006 10:08 AM
To WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY Falmouth
STATE MI
ORGANIZATION
CATEGORY GeneralPublic
OtherCategory
Date September 28, 2006
Time 10:08:19 AM

COMMENTS

I do not agree with the proposed changes to WIC guidelines. Reducing the amount of milk these children receive is not going to benefit them in any way. Substituting fruits and vegetables for milk is not going to give these children the same calcium and nutrients they need to grow. Most WIC participants are lacking in recommended nutrients that are easily included with a good amount of milk and dairy products to a daily diet. As a Head Start teacher, I see many children and families who are on the WIC program. This program benefits these children, and when you take important things like milk out of the diet of these children, it is going to harm them during their important growing stages. In a year where the economy is bad and jobs are hard to find, do you really think it is going to benefit anyone when you take 900 million pounds of milk and milk products out of circulation? Tell me again, who are you trying to benefit? It is definitely not the children and families belonging to WIC if you think this proposal is right.

GP-84

Sent Thursday, September 28, 2006 10:27 PM

To WICHQ-SFPD

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

To Whom It May Concern

As parents of a one year old child, we strongly support the proposed WIC Food Packages Rule because it is based on current nutritional science. Pediatricians and nutritionists encourage children to eat more fruits and vegetables and less saturated fat, so it makes sense to reflect these priorities in the WIC program. Clearly getting children off to a good start nutritionally is important in minimizing childhood sickness (colds, ear infections, etc.) Perhaps more importantly, a good nutritional start limits adult diseases such as heart disease and diabetes which decrease quality of life and increase health care costs.

We have seen quotes from agricultural groups such as the egg producers association who are concerned this will decrease their profits. The purpose of the WIC program is not to serve the egg producers or any other agricultural group. So we encourage the USDA and decision-makers to stand strong to protect the future of our children.

Thank you for your consideration.

Sincerely,

Stevens Point, WI 54481

GP-85

Docket ID Number 0584-AD77, WIC Food Packages Rule

Sent Friday, September 29, 2006 4 05 PM

To WICHQ-SFPD

Cc djdan

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

Dear Friends at the US Department of Agriculture,

I can't tell you how much I support the WIC program and I am overjoyed to hear that you are now considering adding fruits and vegetables to the benefits. I really hope that you make this addition. As a taxpayer, this is where I want my money to go. You have my complete and total support for this improvement. If I can do anything to help at a grassroots level, please do not hesitate to call me at 310-919-8189.

Thank you so much and keep up the good work in providing healthy nutrition to our nation's most vulnerable and needy families.

Liberty Mutual

Senior Technical Training Consultant for the Pacific Region

Los Angeles Office

GP-87

From WebMaster@fns.usda.gov
Sent Monday, October 02, 2006 8:00 PM
To WICHQ-SFPD
Subject: Revisions to WIC Food Packages - Proposed Rule

CITY Spencer
STATE West Virginia
ORGANIZATION
CATEGORY Other
OtherCategory public health/ nutrition student
Date October 02, 2006
Time 07:59:50 PM

COMMENTS:

I strongly support the proposed WIC revisions. As the nutritional status of WIC participants has changed and nutrition knowledge has improved, the program should adapt to best fulfill their needs. Unfortunately, it currently has a number of weaknesses which may be contributing to some of our national health problems. The proposed rules could help change low-income Americans change their eating habits to healthier foods that lessen their potential of health problems like type II diabetes, obesity, and health disease.

The addition of more whole fruits and vegetables is a particularly important aspect. Again and again, research is showing that fruits and vegetables contain many compounds that help insure our health. And, luckily, children develop their eating patterns in the age range that WIC serves, so any changes in supply options could potentially impact healthy eating patterns for an entire generation. At the very least, with an increase in nutrient dense foods, weight problems may decrease. As you well know, the WIC population is the one with the highest rates of weight problems, and thus possibly the one with the most to gain from nutrition-based interventions.

Also, supporting farmer's market programs can only help local economies and provide fresher vegetables than WIC families would otherwise be able to access. Fresh vegetables taste better, kids tend to be more willing to eat them, and everyone is happier and healthier. Having seen the recent opening of my town's first farmer's market in generations, the impact on the community and children was astonishing. Teenagers were getting up to be at the farmer's market by 8 am on Sat. to shop and check out the crowd, kids were prodding and asking about known and strange vegetables (raspberries grow on bushes), young entrepreneurs were selling their own produce and eggs to other families. And none of these products caused E. coli poisoning, contained trans fat, had added sodium, or had any added fats. Furthermore, as farmer's markets continue to grow, they

are reaching into underserved neighborhoods No longer is the bodega or Wal-mart the only option

While I have very little knowledge on the subject of breastfeeding, I fully support programs that do not penalize mothers for choosing to breastfeed as it seems to be healthier for the infant However, the program should remain aware of the struggle around working and breast-feeding and refrain from penalizing mothers who find themselves in situations where they are unable to solve the logistical difficulties around breastfeeding

Stop trying to solve the problems from two generations ago and work on today's issues-- obesity, fruit and vegetable consumption, whole grains, fat intake, and breastfeeding

Sincerely,

GP-89

Sent Tuesday, October 03, 2006 1:00 AM

To: WICHQ-SFPD

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

Please note I am not sure that I am replying to the correct notice. Please forward my suggestion to the appropriate individual if I am replying to the wrong public comments notice. Thank you.

In reference to the revisions being proposed for the food packages provided by WIC, I would like to make the following comments:

First, the milk allotment should not be reduced at all! We currently go through immense quantities of milk, as recommended for good bone growth for children, as well as for women when pregnant or lactating. Calcium is so important to prevent osteoporosis and to ensure strong bone growth and I strongly feel that the milk allotment should definitely NOT be reduced, but increased for the children and for pregnant and lactating women, as well.

The cheese allotment during pregnancy is way too much! I consumed all of the cheese recommended and gained 70 pounds! Yikes. If you must take off products to replace with fruits and vegetables, this would be a good area to focus on. The cheese allotment for the children (at 1 pound a month) is appropriate or could be increased slightly.

Since juice is not currently recommended as being nutritionally valuable, the juice allotment could definitely be greatly reduced in favor of more milk.

The dried beans allotment could also be revised. Honestly, I quit getting the dried beans because, frankly, they are gross and possibly dangerous to prepare. Have you ever tried to prepare dried beans for consumption? After soaking them overnight, they lose their shells and begin to develop a slimy coating and possibly a mold-like growth which may be unsafe for consumption (?). Despite this, if you persist to cook them, they remain hard and rubbery even after cooking in a crock pot for 8 hours. Beans are a wonderful source of nutrition and should definitely remain in the food packages. However, I recommend allowing a choice of peanut butter or canned/fresh beans to replace the dried beans. The price difference is negligible. Trust me, based on my experience, most of the other WIC participants I know do not use their bean allotments due to the above-mentioned issues.

Regarding allowing participants to select whole grains, I think crackers and breads would probably be the most readily accessible form of whole grains available.

Fruit and vegetable selection is usually the best at farmer's markets (pricey though) and Amish farmstands, where actual produce can be found. Supermarket produce barely resembles the item that it is supposed to be. For example, the tomatoes are so genetically

engineered for shelf stability that they are now hard, pink, and juiceless, instead of being soft, red, and juicy as they are supposed to be. This is just one example. In Pennsylvania, the only items that I have found that compare to the "real McCoy" are locally grown apples. Please allow WIC participants to continue using the new vouchers (printed on separate checks) for produce at farmstands, as the old farmer's market checks were used (in seasons when this is possible). The cons of genetically engineered produce would probably not exceed the benefits for the future. The nutrition of GE foods is also significantly lacking.

Generally, most lower income individuals cannot afford fresh fruits and vegetables because, aside from meat, they are the most costly in terms of immediate benefit. Also, they perish rather quickly. If WIC does include fruits and vegetables, maybe the amount could be broken down into smaller weekly checks due to this fact. Bananas, for example, have maybe 3 days shelf life.

The cereal allotment is good as it stands, but could always be increased if funding were available.

Maybe lower cost generic foods could be a requirement for all participants, to allow the participants to purchase more food.

Thank you for your time.

GP-92

Sent Tuesday, October 03, 2006 5:03 PM

To: WICHQ-SFPD

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

Dear Ms. Daniels:

I am writing to thank USDA/FNS for its efforts in bringing the WIC food packages in alignment with the 2005 US Dietary Guidelines, and I urge USDA to finalize the rule as soon as possible.

These guidelines will make life better for many people.

Portland, OR 97212

GP-94

Sent Tuesday, October 03, 2006 5:11 PM

To WICHQ-SFPD

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

Patricia N Daniels

Director, Supplemental Food Programs Division

Dear Ms. Daniels,

I support the idea of the USDA updating its WIC food offerings to reflect healthier choices. Food offered by WIC should conform to modern nutritional guidelines, particularly in this time of rampant obesity. It would also be good to have more culturally diverse foods like tortillas and rice. This update is long overdue, perhaps due to influence by the dairy, egg, and juice lobbyists. Please do what's best for the nutrition of women and children in the program.

Boulder, CO 80301

GP-130

Sent Wednesday, October 04, 2006 2:41 PM

To WICHQ-SFPD

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 thank USDA/FNS for its efforts in bringing the WIC food packages in alignment with the 2005 US Dietary Guidelines and other national nutrition guidance, including those of the American Academy of Pediatrics

The WIC Food Package Proposed Rule offers the most significant and substantive changes to the food packages since the Program’s inception in 1974

The proposed changes add fruits and vegetables, whole grain cereals and other whole grains, soy milk, tofu and canned beans, among others, which provide a greater variety of high nutrient food choices to the WIC participants. The revised food packages will help our nation’s families most in need to establish healthy eating habits – a key to preventing obesity, diabetes and heart disease

I urge USDA to finalize the rule as soon as possible Thank you

San Bernardino, CA 92415

GP-133

Sent Wednesday, October 04, 2006 3:30 PM

To: WICHQ-SFPD

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 thank USDA/FNS for its efforts in bringing the WIC food packages in alignment with the 2005 US Dietary Guidelines and other national nutrition guidance, including those of the American Academy of Pediatrics.

As a first grade teacher, I am very concerned about the diets of young children. There is no doubt that nutrition profoundly affects children's physical and mental development, and, in turn, their educational success. I think that the proposed changes to the WIC food guidelines will help ensure that more low-income children have access to well-balanced meals. These children will not only be better prepared for school, they will also be better prepared to make healthy choices as they grow up.

I urge USDA to finalize the rule as soon as possible.

Somerville, MA 02144

GP-134

Sent Wednesday, October 04, 2006 9 09 AM

To WICHQ-SFPD

Subject DocketID#0584-AD77, WIC Food Package Rule

I disagree with the possibility of changing the rules for WIC Do not cut the amount of dairy which can be used in the program

Thank You,

Waunakee, WI 53597-1868

GP-139

Sent Wednesday, October 04, 2006 9 20 PM

To. WICHQ-SFPD

Subject "Docket ID number 0584-AD77, Wic Food Packages Rule"

I just want to say, why can't it be a option Let's just have the checks printed for fruit & veg, & as well as the standbys Let the parent make the choice Just like being able to use the checks for fresh veg at the farmers markets Put the responsibility on the families Give a choice Thanks for this option to respond

OCT 10 2006

Portland, ME 04101

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Dept. of Agriculture
3101 Park Center Drive, Rm 528
Alexandria, VA 22303

GP-141

Dear Ms. Daniels:

Your program plans to revise WIC food packages to increase access to the products sold at farmers markets, namely fruits and vegetables. Do it!

That's terrific. Those of us who are not financially secure need all the help we can get. Please continue your good work.

Sincerely,

GP-142

Sent Thursday, October 05, 2006 2 19 AM

To WICHQ-SFPD

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

Dear Friends at the US Department of Agriculture,

Thank you so much for adding fruits and vegetables to the WIC checks. I believe that this change will be substantially beneficial for the families that receive these checks, by increasing the nutritional balance of food intake that the families will be able obtain. Fruits and vegetables are basic food groups that may not be easily obtainable for many low income families out there, so this change will definitely have a positive impact on the recipients.

Thank you

Sincerely,

GP-153

Sent Thursday, October 05, 2006 5 13 PM
Subject RevisionstoWICFoodPackages-Proposed Rule

CITY San Jose
STATE CA
ORGANIZATION
CATEGORY GeneralPublic
OtherCategory
Date October 05, 2006
Time 05 12 37 PM

COMMENTS

I am in favor of changing the WIC food packages to include fruits and vegetables and limit juices These changes will help ensure healthier babies

GP-194

Sent: Sunday, October 08, 2006 4:09 PM
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: San Jose
STATE: California
ORGANIZATION:
CATEGORY: GeneralPublic
OtherCategory:
Date: October 08, 2006
Time: 04:08:58 PM

COMMENTS

I support the proposed changes to the WIC nutrition program. I urge you to implement the proposal and help children overcome the epidemic of obesity that has become prevalent in our society.

GP-200

From WebMaster@fns.usda.gov
Sent Monday, October 09, 2006 10:17 AM
To WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME Alice Christina
EMAIL alicechristi@yahoo.com
CITY Colchester
STATE VT
ORGANIZATION
CATEGORY GeneralPublic
OtherCategory
Date October 09, 2006
Time: 10:17:25 AM

COMMENTS

The proposed changes are important to provide good nutrition and options for vegetarians. The variety of foods are also very important to improve healthy eating habits and prevent obesity. The addition of fruits and vegetables is SO important. I applaud you for making this historic change!!! Thanks!

OCT 24 2006

08-NP

GP-259

Patricia Daniels

Director, Supplemental Food Programs Division
Food and Nutrition Service, U S Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, VA 22302

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

Dear Ms Daniels

I strongly support the inclusion of fruits and vegetables in the Special Supplemental Feeding Program for Women Infants and Children (WIC). I applaud the U S Department of Agriculture (USDA) for taking this important step to update the program and bring it in line with the *2005 Dietary Guidelines for Americans (DGA's)*

I recommend that the final rule

1 Follow the Institute of Medicine's (IOM) Recommendations for \$10 & \$8 Fruit and Vegetable Cash Vouchers

Research clearly demonstrates that a diet rich in fruits and vegetables decreases the risk of high blood pressure, heart disease, certain cancers and obesity Healthy eating habits are often formed in childhood but the benefits last a lifetime

Given that WIC families consume less than half of the fruits and vegetables recommended in the DGA's, I strongly encourage USDA to provide women and children with \$10/month and \$8/month, respectively, cash-value vouchers for fruits and vegetables as recommended by the IOM

2 Maximize Choice

USDA should not give State WIC agencies the authority to further restrict or limit participants' choices of fruits and vegetables Given individual preferences as well as cultural and regional norms, a wide variety of fresh, frozen, dried and canned fruits and vegetables should qualify under the voucher program Within the fresh category all fruits and vegetables should qualify

In closing, the addition of fresh fruits and vegetables to WIC Food Packages will reinforce nutrition education messages already provided to WIC participants and now they will have the resources to put this nutrition education into practice

I commend USDA for this proposed rule that will help WIC participants increase their fruit and vegetable consumption and urge USDA to issue the final rule as soon as possible.

Sincerely,

W. Natchee, LWA
98801

OCT - 9 2006

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

October 4, 2006

GP - 32

Dear Patricia Daniels,

Upon shadowing the WIC Registered Dietitians at Washington County Public Health; it became apparent that the current WIC food package options are not in accord with recent recommendations. I am writing in an attempt to parallel 2005 Dietary Guidelines for Americans with available food options for WIC clients. Nutrition advice is constantly changing as new research is conducted, offered foods should reflect advanced information to maximize patient health.

In addition to the fact that WIC food packages have not been revised since 1980, the existing options do not offer any fresh fruits or vegetables. The WIC food program offers more juice than is recommended and isn't as age specific as necessary for optimal growth and development. The last aspect of the program that I would like to revise is available formula, as many studies have proven breastfeeding is ideal for the baby. As a motivator to encourage breastfeeding, less formula should be offered to mothers who are able to breastfeed. Instead of giving formula, the program could offer more food options to the nursing mother so her health status is maintained.

Current WIC food packages offer the following: cereal, juice, milk, cheese, dried beans, eggs and peanut butter, exclusively breastfeeding mothers have access to canned tuna and carrots as well. Although a child on this diet may meet recommendations for some food groups, they would be left lacking in some of the most important

Dairy and protein are two food groups that WIC clientele are able to consume in adequate amounts. The program is insufficient in the fruit and vegetable food groups, these two groups provide the largest amounts of vitamins and minerals and are therefore vital to a complete diet. WIC clients aren't given fresh produce, as an option and as a result may be deficient in some micronutrients that are vital to health and proper growth.

100% juice can offer some vitamins to children, but also offers high amounts of sugar. When children ingest large amounts of juice they will be less likely to consume adequate nutrient dense calories throughout the day. They will be exceeding advised sugar consumption and increase the likelihood of tooth decay and other sugar related disadvantages. WIC RDs do not recommend large amounts of juice consumption and food packages should reflect this advice.

Making vouchers more age specific will ensure that each child is consuming what is necessary for their specific growth period. Milk recommendations are very age particular.

no cows milk is advised before one year, children age one year to two years should consume whole milk, and children above age two can drink lower fat milk. There are no stipulations on milk fat content within the WIC food program. If professionals feel strongly about supporting these requirements, as well as health of their clientele, some regulations must be enforced.

The benefits of breastfeeding are numerous, classes are offered through WIC to encourage and assist mothers in breastfeeding, and at each follow up session breastfeeding is addressed to alleviate problems the mother may be having. If the program is going to make this effort to encourage breastfeeding, that same effort needs to be made to maintain exclusive breastfeeding for clientele who are able. Mothers who choose to breastfeed still have access to formula, this may encourage them to introduce formula to a baby who would otherwise consume breast milk alone. The resources used to offer formula to these women could be better used on the nursing mothers. Increasing amounts and variety of available food could help a breastfeeding mom maintain proper health so she can continue sufficiently feeding her baby for the recommended period of time.

Nutrition professionals have worked hard to conduct research, format requirements and then communicate these recommendations to patients. A food list that supports current information will encourage clientele to follow modern dietetic recommendations, which would lead to a healthier population. Healthier people signify lower disease rates and higher functionality. With a few simple modifications, the WIC program could increase the power of the message professionals have been trying to enforce for many years.

Sincerely Yours,

~~OCT 10 2006~~

October 7, 2006

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of agriculture
3101 Park Center Drive Room 528
Alexandria, Virginia 22303

Dear Ms. Daniels:

I just wanted to thank you for the changes that will be occurring with the new WIC supplements. Women, Infants and Children will all benefit from healthier choices. Fruits and vegetables are great choices. I have been a recipient of WIC and truly appreciate the program. These changes will be even better. Thanks again.

Sincerely yours,

Poland, ME 04274

CP-326

10.4 - 5 2006

October 4, 2006

520 N Sherwood St #18
Fort Collins, CO 80521

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, Virginia 22303

GP-328

To Patricia Daniels.

REF Docket ID Number 0584-AD77-WIC Food Package Rule

Hello I am writing in reference to the new WIC fruit and vegetable program currently proposed I would like to express my strong support for any WIC programs that expand choices of nutritional and local foods to WIC recipients, especially those that promote farmers' markets as approved WIC vendors I feel this new program could greatly expand the opportunities to support and the value of farmers' markets to lower income, nutritionally at-risk mothers and families Mothers shopping at markets will have access to fresh and nutritious foods that may not be as available at other vendors I believe that mothers should have the freedom of choice to pick out which fruits and vegetable will best serve their families' needs (with coordination of nutrition education programs) At the same time this proposed program will help support local markets and put money back into the communities that may turn around and provide greater opportunities to low income mothers. In this vein I strongly suggest that farmers' market vendors not be required to carry the full range of WIC food, as really that isn't possible for small vendors and WIC recipients may use their allotments at varies vendors

While supporting this new proposed program I would also like to say that I support the current WIC Farmers' Market Nutrition Program. Funding for the current WIC FMNP should be left intact and the effectiveness of this program should continue to be supported I believe that states and tribes already participating in WIC FMNPs can expand their programs to include the new fruit and vegetable options

Again, I strongly support the new WIC food packages proposal that would increase fruit and vegetable allowances, and promote the use of these at local farmers' markets

Thank you,

OCT - 4 2006

Westminster Station, VT 05159

Oct. 4, 2006

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, Virginia 22303

GP-329

Dear Ms. Daniels:

In reference to REF Docket ID Number 0584-AD77-WIC Food Package Rule, I want to say that I very much support the regulations proposed in this rule. As a sister to several produce farmers who rely on local markets to make a living, I am particularly supportive of using WIC coupons at farmers markets. In addition, our local farmers market is new and is struggling to become viable. There are also many WIC clients in our area. So this proposal will benefit many people in our community.

I would also like to make these points:

Farmers' markets should be able to participate as seasonal vendors, be exempt from the "WIC-only" cost containment requirements and should not be required to carry a full-range of WIC food package products.

I also urge that you do not limit the type of fresh fruits and vegetables that may be bought with the new fruit and vegetable coupons.

Thank you,

OCT 13 2006

October 12, 2006

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

GP-330

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

Dear Ms Daniels,

I am writing in support of the proposed changes to the WIC food packages. It is wonderful that the packages will now offer a greater variety of foods including whole grains, fruits and vegetables, and soy products. I am also pleased with the reduction of juice, milk, and eggs. These changes are critical for the health of our participants. WIC reaches mass amounts of people, currently serving half of the infants and a quarter of the children, ages 1 – 5, in the United States. The new proposals to the food package will assist in combating several of our nation's current health problems, including obesity and chronic diseases such as cancer, and heart disease.

An increase in the variety and amount of whole grains offered is certain to promote a greater consumption of whole grain products compared to currently only providing breakfast cereals as whole grain food options. The addition of canned beans, rather than just dried beans, may encourage more participants to choose beans as a high protein, high fiber food due to their ease of preparation.

Juice is currently a significant portion of the WIC food package. It continues to be a factor in promoting dental caries and obesity among young children. Although the elimination of juice for infants has been proposed, I think it would be even more beneficial to eliminate all juice, including the juice in the children's and mothers' food packages. The proposal states that the cash allowance for fresh fruit could only be \$6 and \$8 for children and mothers, respectively - \$2 short of the Institute of Medicine's recommendation due to financial limitations. However, WIC is still proposing to include juice in the budget. The findings are clear that whole fruit has far more benefits than juice. I feel that it would be most beneficial to eliminate juice completely and allocate that money to whole fruits and vegetables.

The new package also proposes reducing the amount of milk currently allotted to participants. Although calcium is extremely important for children's growth and development, the new WIC packages will still provide over two cups a day for children, consistent with the recommendations from the USDA dietary guidelines. Further, the increase in calcium containing foods, including soy milk and calcium-set tofu, will benefit many participants who have difficulty digesting milk products along with those who favor alternative foods due to cultural preferences.

The industries that are opposing this movement are concerned about money, not about the health of our children. On August 8, 2006, the National Dairy Council issued a

statement confirming that, “the WIC food packages in the proposed rule provide the age-appropriate number of servings recommended by the 2005 Dietary Guidelines for most groups, [but] that amount is a reduction in dairy from the current WIC packages, which provide up to four servings per day ” Even the National Dairy Council agrees that the reduction is in agreement with the current standards Their only opposition is that it reduces the amount of milk from its current allowance; thus, they will lose money, but the changes will still provide adequate amounts of dairy to meet the needs of the participants Their argument continues that WIC “does not allow reduced-lactose or lactose-free milk as a substitution,” and that not allowing other dairy products (cheese and yogurt) will not be conducive to those who are lactose intolerant but can generally consume these other milk based products in order to get their daily dairy servings **This is not true.** The WIC program **does**, currently, allow participants to choose reduced-lactose and lactose-free milk products The National Dairy Council is clearly concerned about losing money rather than promoting the health of our participants and maintaining congruent messages among health-based organizations If money is going to be focus of concern, consider the amount of money that will be saved over years and years of better health for our population

The proposals for the new WIC food packages are remarkable in their forward thinking and ability to address the health issues of the current population The decrease in juice, eggs, and cheese, offers lower fat and sugar options helping to combat the increasing amounts of childhood obesity. The increase in whole grains and calcium-based foods will increase consumption and aid in improving growth, reducing chronic diseases, and assisting in weight control Our nation’s health issues are serious, and the effects the new food package will have should not be minimized From a public health standpoint, we can reach millions of people and help to alleviate the overall declining health of our nation Please take these considerations sincerely, and make each decision based on what is best for the well-being of our nation.

Sincerely,

Dietetic Intern
California State University, Northridge

OCT 20 2006

GP-340

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

October 18, 2006

Dear Ms. Daniels;

My name is _____ and I am a Dietetic Intern as well as a Master of Clinical Nutrition student at Oregon Health and Sciences University. I am writing this letter in response to the proposed changes to the WIC food packages.

I support the proposed changes to the food packages. After spending some time at WIC I feel that it sends a mixed message to provide juice to children. Parents who come into WIC are given a very brief amount of time to receive nutrition education; frequently their children are upset after having their finger pricked, and their height and weight taken. It is not feasible to think that parents are fully able to listen to the nutrition education that they hear. Often when they leave they leave with the knowledge that "WIC foods are healthy foods". Although this statement is true, in our culture of excess people can often take a statement like this too far, it is possible to have too much of a good thing. After sitting in on several educational periods, almost all parents were feeding their children more juice than the recommended amount, some children drank up to four 16 ounce glasses a day.

I also applaud the efforts made to fund the use of alternative sources of calcium. The majority of the world's population is lactose intolerant, particularly people of minority descent, who also happen to be a large portion of the WIC clientele. It is wonderful that we are now able to provide these people with a source of calcium that they can ingest. I have concern over the disallowal of culture and religion in regards to the replacement of milk for children. Children have a right to practice religious and cultural eating habits. Children are people too. It is unfair to not allow parents to practice their beliefs regarding how to raise their children. What is the point of providing a milk voucher to a family that will not be able to use it? I realize that this is a matter of cost, but I urge you to consider pursuing funding to allow for milk alternatives to be freely chosen by parents regardless of medical need. Soy provides many health benefits that cow's milk does not and may have a protective effect against heart disease, one of the biggest killers in this country.

I am thrilled by the inclusion of fresh fruits and vegetables! I am concerned by the use of electronic debits to implement this program. Not all WIC participants have access to stores that have the machinery available to process this. Additionally not all of the WIC participants have access to stores that sell fresh produce. The substitution of bananas for infant fruit is commendable, but perhaps there is an alternative fruit that provides more Vitamin C and A that infants could also eat. Allowing parents to buy whole fruit of their choice, and providing some basic education at the time that they receive these vouchers on how to cook and puree the fruit for their children could allow the inclusion of fresh fruits, that are infant friendly, and higher in Vitamins of concern.

I support the proposed changes To the WIC food packages, despite some concerns over the accessibility of WIC participants to the foods provided, and the disallowal of soy

alternatives for children who do not have a medical need. I feel that these changes are a step in the right direction whose time has certainly come. In order for WIC to remain a viable, important model of food distribution and government programs it must change and grow, much as its recipients change and grow. The demographic profile of WIC is changing, as is the demographic profile of this country. WIC must keep pace with these changes by providing services that meet the needs of its clients. Gone are the days of programs that provide pure calories, now our programs must help reduce obesity, hypertension, diabetes, and heart disease, while also providing supplemental fat, protein, and calories. Congratulations on taking an important move towards a better program.

Sincerely,

5927 NE Alameda St
Portland, OR 97213

WIC Food Packages Proposed Rule to USDA

107 - 3 2014

Dietetic Intern
Loyola University Chicago
Chicago IL, 60611

GP-355

Docket ID Number 0584-AD77-WIC Food Packages Rule

Dear Ms Daniel

I commend USDA on its efforts to make changes to the food packages offered at the Special Supplemental Nutrition Program for Women, Infants and Children I rotated through WIC for two weeks as part of my internship in September where I got a chance to counsel 25 WIC clients While working there I felt like our counseling sessions were contradicted by the packages offered by WIC These packages do not support the 2005 Dietary Guidelines for America

I strongly support reducing the amount of juice offered to the WIC population and including fruits and vegetables to their food packages The current food packages confuse them because we counsel them to reduce the juice intake and at the same time give them food packages with a lot of juice and no fresh fruits and vegetables

Similarly milk consumption in the WIC population is also high because of the amounts they receive in their food packages These packages do not provide any option for people with lactose intolerance, people with milk protein allergy, or for people who do not like milk Adding soy milk and tofu to the packages will help to meet calcium needs of all populations and address cultural diversity of the WIC population

Whole grains are an important source of fiber, which reduces the risk of health conditions such as cancer, heart disease, obesity, digestive problems, and type 2 diabetes Introducing whole grains to the food packages will allow the WIC population to benefit from the health effects of fiber intake

American Academy of Pediatrics recommends exclusive breastfeeding for 6 months and to continue breastfeeding till 1 year of age However, most WIC clients do not meet these goals. I encourage the adoption of new practices to support breastfeeding by giving the mother incentives to breastfeed This will greatly benefit the infants and their mothers

I strongly recommend bringing the proposed new food package for WIC into effect as soon as possible to improve the health outcomes of our country's most vulnerable population including women, infants, and children The new food packages are more in adherence with the 2005 Dietary Guidelines for Americans and the recommendations of the American Academy of Pediatrics

Sincerely,



Occanside, CA 92054

OCT 20 2006

460-439-8003

6/35

20 Oct 07

Director Daniels,

Please adopt new WIC
 benefits including non-dairy
 alternatives to milk. My
 family dropped out of the
 program because my children
 are highly allergic to dairy.
 We are blessed with enough
 food, but we do end up changing
 groceries to the credit card quite
 often. Others are not as fortunate
 as we are w/ these changes.
 Would do a lot to help ensure
 the health of Americas children

Thank you,



Oceanside, CA 92054

CP-257

OCT 21 1988

760-439-8003

20 Oct 87

Director Daniels

Please adopt new WIC benefits including non-dairy alternatives to milk. My family dropped out of the program because my children are highly allergic to dairy. We are blessed with enough food, but we do end up charging groceries to the credit card quite often. Others are not as fortunate as we are. Please changes would do a lot to help ensure the health of America's children.

Thank you,



OCT 13 2006

Washington, DC 20006-1600

Kirkpatrick & Lockhart Nicholson Graham LLP

October 13, 2006

Via Electronic Transmission and Overnight Delivery

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

GP 301

Re. USDA Docket ID Number 0584-AD77, Proposed Rule Revisions in the WIC Food Packages

Dear Ms Daniels

On behalf of a client, we respectfully submit these initial comments with respect to the proposed rule issued by the Food and Nutrition Service ("FNS") of the United States Department of Agriculture ("USDA") entitled, "Special Supplemental Nutrition Program for Women, Infants and Children (WIC): Revisions in the WIC Food Packages" ("proposed rule") This proposed rule was published in the Federal Register on August 7, 2006 71 Fed Reg 44784 (to be codified at 7 C.F.R. Part 246).

We commend the FNS on its efforts to revise WIC food packages to better reflect current nutrition science and dietary recommendations We agree with the FNS when it stated in the Advanced Notice of Proposed Rulemaking ("ANPR"), 68 Fed Reg 53903 (Sept 15, 2003), that "public comment is necessary to inform decisions and to bolster the scientific and programmatic integrity" Id With this goal in mind, we respectfully request that the FNS consider extending the comment period on the proposed rule by 30 days to allow sufficient time to prepare and submit comments

I. Action Requested

As the FNS acknowledges in its preamble discussion to the proposed rule, once finalized, the proposed rule will implement the first comprehensive revisions to WIC food packages since 1980, including substantive changes to the current food packages and dietary recommendations 71 Fed Reg at 44784 Because the proposed rule is over 70 pages and represents "a dramatic change in infant food package issuance procedures," 71 Fed Reg at 44795, we respectfully request that the period of time for comment be extended by 30 days to December 6, 2006, to provide industry and other interested parties sufficient time to review and comment on the proposed rule and prior administrative record on the WIC Program and its goals



Kirkpatrick & Lockhart Nicholson Graham LLP

Patricia N Daniels

October 13, 2006

Page 2

II. Discussion

In issuing the proposed rule on revisions to WIC food packages, the FNS has asked for comments on a number of aspects of the proposed rule. Among others, the FNS specifically asked for comments on.

“The three infant feeding options,”

“Impact of proposed changes on breastfeeding rates,”

“Staff training and building support for the proposed changes among WIC staff,”

“The expression of monthly maximum amounts of infant formula in reconstituted fluid ounces,”

“The methodology used to round up infant formula and infant foods,”

“Participant nutrition education,” and

“Administrative feasibility.”

71 Fed Reg at 44796. The FNS also requested input on “the potential impacts of the proposed changes to Food Packages I and II, and any comments or suggestions on alternative options for FSN to consider.” Id.

We believe these items and others are important factors to be considered when revising the WIC Program. However, we are concerned that the FNS has not provided industry and other interested parties sufficient time in which to prepare and submit comments given the length of the proposed rule and the complexity of issues.

The FNS’ proposed rule revising the WIC Program is over 70 pages. It includes 9 pages of proposed regulations, 29 pages of preamble discussion on the background to the proposed rule and its specific provisions, and 33 pages of analysis of the regulatory and economic impact of the proposed rule. Based on the mere size of this document, we believe that additional time is necessary for interested parties to thoroughly review, analyze, and prepare substantive comments to the proposed rule.

Furthermore, as evidenced by the length of the preamble discussion and the substantive nature of the proposed changes to the WIC Program, complex issues are being discussed and considered. Of note, the report produced by the National Academies’ Institute of Medicine (“IOM”) is over 200 pages. The FNS based its proposal on the IOM’s recommendations and comments.



Kirkpatrick & Lockhart Nicholson Graham LLP

Patricia N Daniels

October 13, 2006

Page 3

submitted in response to the ANPR 71 Fed Reg at 44811. Thus, the administrative record that provides the basis for this proposed rule is significant.

We recognize that the FNS is being directed by Congress to move expeditiously in finalizing this rule. That being said, we believe it is important for the FNS to continue what has been a measured and timely process. The FNS issued the ANPR in September 2003, at the same time it commissioned the IOM study to independently review the WIC food packages in a 22 month study. The IOM report, which is over 200 pages long, was issued in April 2005, and the FNS issued the subject proposed rule in August 2006. Based on this administrative record, we do not believe a request for a 30 day extension of time to submit comments would unduly delay the issuance and implementation of final rule.

III. Conclusion

Based on the length of the proposed rule, the significance of the proposed changes, and complexity of the administrative record, we question whether comprehensive and cogent comments to the proposed rule can be provided within the limited time frame of three months. For this reason, we respectfully request that the FNS extend the comment period by 30 days to December 6, 2006.

We appreciate the opportunity to provide these initial comments and welcome any questions the FNS may have on this request.

Sincerely,

OCT 18 2006

68-362

October 12, 2006

Patricia N Daniels
Director of 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: SUPPORT

Dear Ms Daniels

I am writing you to voice my support for the newly proposed WIC food packages. As a Foods and Nutrition student at San Diego State University, I am part of a network of over 170 Foods and Nutrition undergraduates. As a prospective dietitian I am constantly looking for ways to improve the health of our community. I strongly feel that the proposed changes to the WIC food packages have the ability to do just that.

WIC food packages have not been comprehensively altered since 1980. In the past 26 years, through extensive scientific research, convincing evidence regarding the components of a healthy diet has been compiled. This research coupled with our nation's changing demographics necessitates the revision of WIC food packages.

The proposed revisions in WIC food packages are a tremendous step towards ensuring a healthier future for many Americans. The new packages will provide greater consistency with established dietary recommendations for infants and children under 2. This includes strong encouragement and support of breastfeeding. Breast milk is the best food for babies, it provides all the necessary nutrients in just the right amounts, and breastfeeding has been proven to give babies a mental and physical head-start on life. With mounting evidence in support of breastfeeding, it is our responsibility to do all we can to encourage this excellent source of nutrition. In 2003 approximately 70 percent of women were breastfeeding their babies when they left the hospital, however, only 36 percent of women continued breastfeeding their babies until six months of age. By providing strong incentives such as additional quantities and types of foods to breastfeeding mothers, the new WIC food packages will help keep mothers and babies healthier.

Additionally, the new WIC food packages will address emerging public health and nutrition-related issues by including fruits, vegetables and emphasizing whole grains while providing less saturated fat and cholesterol. It is imperative that children learn the importance of eating fruits, vegetables and a variety of grains early in life. Introducing a healthy, well-balanced diet early in life will teach children sound nutrition practices which will carry over throughout their adult lives. Studies have shown that healthy eating patterns developed early in life can help prevent future negative health problems such as coronary heart disease, cancer, and stroke. Furthermore, one of the biggest problems facing youth today is childhood obesity. Today, over 4.7 million children between 6 and 17 years of age are overweight or obese. Childhood obesity has more

than doubled in the last three decades. As a society, this growing epidemic is something we need to address

The proposed changes to the WIC food packages would be of great benefit for infants and their mothers. With approximately 1 out of every 2 children born in the United States participating in the WIC program, this is our chance to positively impact their lives now and in the future.

Thank you for your consideration in this important matter.

Sincerely,

Student of Foods and Nutrition
San Diego State University

53 E 400 S
Smithfield, UT 84335

OCT 23 2006

October 22, 2006

Ms Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, Virginia 22303

GP-372

Dear Ms Daniels

REF Docket ID Number 0584-AD77-WIC Food Package Rule

My name is _____ I am a senior studying Community Health Education at Utah State University I am writing this letter in reference to a message I received from a Community Nutrition class We have recently been learning about the WIC program and how it benefits millions of Americans nationally I am intrigued to learn that new WIC rules may benefit Farmers' Markets

I understand that the proposed regulations offer exciting news for local food advocates and Farmers' Markets Adding almost \$500 million per year in fruit and vegetable buying power to WIC food packages and allowing the produce to be purchased at Farmers' Markets is a big step in the right direction in the world of nutrition I am extremely satisfied with this proposed regulation and know it will benefit WIC recipients nationwide

I recognize that there is concern among some individuals that this proposal would eclipse or force out the FMNP I strongly disagree with this for a few reasons First, this opportunity would significantly increase both the value of foods to nutritionally at-risk individuals and sales at Farmers' Markets Second, there is no intention whatsoever to eliminate, downgrade or alter the current WIC program or the FMNP These are both positive essentials which can in turn improve the health status of our nation

Everyone deserves to have a chance at being the healthiest person they can be Low income families shouldn't be discriminated when it comes to choosing and eating nutritious foods for themselves and their children Please consider this proposed regulation to take its toll on our nation, the benefits outweigh the disadvantages greatly I look forward to hearing from you and hope you'll consider this letter when making your decisions

Thanks in Advance,

Department of Health, Physical Education and Recreation
Utah State University

October 13, 2006

OCT 17 2006

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

GP-
373

Dear Patricia

My name is _____ and I am a dietetic intern at C W Post/Long Island University in Brookville, New York. I am writing in regards to the change of food packages provided by WIC to its participants. These new improvements will meet the 2005 Dietary Guidelines for Americans and current infant feeding practice guidelines of the American Academy of Pediatrics.

In the United States today 60% or more of the population is overweight or obese. Now is the time to put these dietary recommendations to use and help the target population of WIC maintain a healthy life and decrease the risk of obesity.

The new package will add fresh fruits and vegetables for participants ≥ 6 months of age and will eliminate juice from infant food packages. Fresh fruit and vegetables not only add a variety of vitamins, minerals and antioxidants, but also fiber which is important in maintaining gastrointestinal health. Juice provides minimal nutritional value and lacks fiber.

Another way WIC plans to incorporate fiber into the diet of its participants is by adding whole grains to food packages, which is lacking in so many Americans' diets. The recommended amount of fiber is 25-30 grams/day.

Currently, the WIC package offers a choice of whole, 2%, 1% or skim milk. The new package will only provide either 1% milk or skim milk which are lower or devoid of total and saturated fat.

I hope this letter will help motivate a change in the current food supplementation. It may be in the participants' best interest.

Sincerely,

Dietetic Intern

October 11, 2006

Ms. Patricia N. Daniels
Director, Supplemental Food Programs Division
Food and Nutrition Services
USDA
3101 park Center Drive
Alexandria, Virginia 22302

OCT 16 2006

GP-374

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

Dear Ms. Daniels,

This letter is my acknowledgement of support for the regulatory proposed rule; "Docket ID Number 0484-AD77, WIC Food Packages Rule" that would provide important changes in the current WIC food packages. The proposed changes will ensure that WIC foods are being consistent with the 2005 Dietary Guidelines for Americans and the American Academy of Pediatrics current infant feeding practices.

As a Dietetic Intern and former WIC employee, I advocate the provision of fruits and vegetables to the increasingly diverse population WIC serves. In addition, the proposed rule promotes and supports long-term successful breastfeeding, which may play a major role in obesity prevention for our children.

It is imperative that we incorporate healthy changes that will impact the next generation in a positive way. I support the USDA's proposed rule containing changes to the WIC food packages.

Sincerely,

DTR

Dietetic Intern

October 28, 2006

To Patricia N Daniels
Dir, Supplemental Food Programs Division
Food & Nutrition Svc USDA
3101 Park Center Drive, Room 528
Alexandria, VA 22302

GP-390

OCT 28 2006

PLEASE FAX/FORWARD TO APPROPRIATE CONTACT IMMEDIATELY *** TIME SENSITIVE

I am writing to you, in response to the impending change to the WIC program. Please note that it is impossible to get through to you on the link <http://www.fns.usda.gov/wic/regspublished/foodpackagesrevisions-proposedrulecomments.htm> which is supposed to be open for public feedback until Nov., 6, 2006. I have to wonder why this has to be such an atrociously long link which does not, in the end, gain access to the web comment page? There was not enough lead-in time to WIC offices prior to this landmark decision.

That aside, dear Patricia, as a woman in your profession, I am sure that you must be aware of the findings which link high intakes of soy-based commercially grown products and child development risks, especially male sexual reproduction development in young children and infants. Soy products grown on large scale agn-business farms notonously have the highest absorption rates of chemicals and pesticides of any other cash crops grown in America, today. Surely, you must be aware of this – and if you are not, I have to say shame on you.

Please, I implore you on behalf of all Vermont recipients of WIC and our children not to do this to us.

Our locally produced milk and eggs are certainly better for us than needlessly subjecting our children to intentionally poisoned soy products. Vermont farmers, by and large, have voluntarily decided against using bovine growth hormones. This makes our local milk some of the safest and healthiest in the land. What plausible reason would you have for not only destroying our farm community revenues, even further, but also giving us something proven to be so deadly and toxic, in return?

The benefits of omega-3 fatty acids and iron rich nutrients and proteins in our eggs are also proven to outweigh any fears about adding cholesterol in young children and pregnant and nursing mothers' diets. Why must the WIC program be so far behind in the learning curve about the benefits of egg and dairy products, as opposed to the chemical contaminants of importing far-away foreign feeds to our society members whom are the least likely to self-advocate? (And yes, I say "feeds" because it is certain we are being treated like cattle, in this regard.) Not to mention the environmental costs of trucking, and more pollution released into the atmosphere in order to get the surplus cash-crop overages to us, here in Vermont, from the mid-west and other countries, in the first place.

I was so happy to finally see natural peanut butter available – now it will be replaced with sugar-added JIF. What is wrong with you people making these decisions?

Surely, you must have done more homework and research than that!

Laurie Connolly
Laurie Connolly

OCT 27 2006

October 26, 2006

GP-30

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 in favor of the proposed changes to the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) food packages. I'm delighted that the WIC Food Packages rules are being updated to include a greater variety of healthy food.

I support the NWA positions on the USDA proposal to revise the WIC food package. Please finalize the rule with revisions as suggested by NWA as soon as possible.

I thank USDA/FNS for the efforts to bring the WIC food packages in alignment with the 2005 US Dietary Guidelines and other national nutrition guidance, including those of the American Academy of Pediatrics. The revised food packages will help families establish healthy eating habits - important for preventing obesity, diabetes and heart disease.

Sincerely yours,



Sandra N Ward
56 Nonotuck Street
Holyoke, MA 01040-2666

October 17, 2006

GP-393

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

OCT 26 2006

Dear Patricia N. Daniels,

The purpose of this letter is to voice my support of the proposed new WIC food package I know that it is currently under a great deal of examination and I am in high hope of these changes being a success.

I am currently a Loyola Dietetic Intern in Chicago and I just finished my WIC rotation. After examining these proposed ideas with my WIC experiences in mind, it is thrilling to see the suggested new food package I urge that all recommendations be adopted. It is likely the duration of breastfeeding can be enhanced with the elimination of formula in the first month. At WIC, I witnessed many caregivers providing the children with more than 3 fold of the recommended juice intake. It is pleasing to see the increase of fruits, vegetables, and whole grains. These moving modifications can progress the food habits of young children.

I implore you to use your voice in Congress to do anything and everything in the victory of the new WIC food package. It's vital to take all actions to improve the health of WIC participants

Thank you for your time,

Kelly E. O'Connell

Kelly E. O'Connell

OCT 28 2006

698 North 580 East
Logan, UT 84321

October 26, 2006

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, VA 22303

GP-394

To Whom It May Concern,
REF Docket ID Number 0584-AD77-WIC Food Package Rule

My name is Krista Viau. I am currently enrolled at Utah State University where I am acquiring the knowledge to become a registered dietitian and a health advocate. I feel that health professionals need to educate the community and lobby for the propositions that will improve their health and overall quality of life.

I strongly support the USDA's proposed regulations to improve the WIC food packages by including a portion of fruits and vegetables and allowing them to be purchased at farmers' markets. These alterations would provide advantages to WIC recipients and those participating in farmers' markets. They would add variety, help initiate regular consumption of fruits and vegetables at an early age, and improve sales at farmers' markets.

Some have expressed concern that the new fruit and vegetable program will overshadow the Farmers' Market Nutrition Program (FMNP). The new WIC program is intended to expand farmers' markets to low-income, nutritionally at-risk persons while increasing sales. If precautions are taken, such as maintaining FMNP funding and establishing procedures that complement existing FMNP operations and guidelines, all parties should benefit.

Certain guidelines should also be implemented to protect and support the participation of individual farmers' markets. There should be no stipulations that require farmers' markets to provide an entire assortment of products found in WIC food packages. They should be encouraged to participate as seasonal or year-long vendors and be excused from the "WIC-only" cost containment requirements.

In addition to tailoring the program to benefit those involved with the farmers' markets, it should cater to WIC recipients. The United States is composed of a diverse population. There are many different ethnicities, customs, and preferences. For this reason, the program should not restrict the type of fruit or vegetable that can be purchased. A variety of fresh fruits and vegetables available may also give rise to new, healthy food preferences.

I would like to reiterate my support for the proposed regulations. Thank you for your time

Sincerely,

A handwritten signature in black ink, appearing to read "Krista Viau". The signature is fluid and cursive, with a prominent initial "K" and a long, sweeping underline.

Krista Viau

OCT 26 2006

October 3, 2006

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

GP-395

Re 7 CFR Part 246

Dear Ms Daniels:

I am writing to support the USDA's proposed revisions to the WIC food package, as well as to suggest improvements.

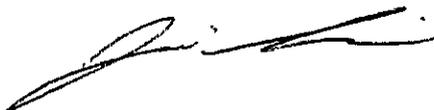
Modifying the WIC food package to better resemble the Dietary Guidelines is a much needed and overdue achievement. I greatly support your emphasis on whole grain products and fruits and vegetables, as well as the removal of fruit juices from the infant food packages. I believe this omission of fruit juice will help reduce the amount of dental caries among WIC children. I also support the option of canned beans, as dry beans can be time consuming and difficult to prepare. I am also appreciative of the increased incentives to breastfeed.

I would like to comment on the proposed fruit and vegetable allotment of \$8 for women and \$6 for children. This past August, the dietetic interns at the University of New Hampshire conducted research on the cost of eating to the MyPyramid sample menu¹. Our findings concluded that the amount of money required to consume fruits and vegetables was approximately \$21 for the week. The MyPyramid menu is based on a 2000 calorie diet for one person. With the fluctuating prices of fruits and vegetables on the market, I do believe the allotment for these goods should be much higher than proposed. I understand this will be impossible to establish while simultaneously maintaining cost neutrality. I believe at this point, by maintaining cost neutrality, it is impossible to adequately support the 8 million WIC participants. Unfortunately, however, suggesting how to procure increased federal funds is beyond the scope of my knowledge.

I would also like to comment on the proposed exclusion of infant cereal until 6 months of age. The American Academy of Pediatrics supports exclusive breastfeeding for about 6 months "while recognizing that infants are often developmentally ready to accept complementary foods between 4 and 6 months"². In addition, two studies found that both early and delayed introduction of cereal grains may increase infant's risk of developing wheat allergy³ and Islet Autoimmunity⁴. These studies suggest a window of opportunity between 4 and 6 months for introducing cereal grains to infants. I believe that complementary foods like infant cereal should be made available to the WIC infant who is developmentally ready to be introduced to solid foods between 4 and 6 months.

Again, I would like to complement the USDA for these proposed changes. I look forward to seeing the final result.

Sincerely,



Jessica Iselin, M.S
Dietetic Intern, University of New Hampshire

¹ MyPyramid Sample Menu for a 2000 Calorie Food Pattern Available at
http://www.mypyramid.gov/downloads/sample_menu.pdf

² Pediatric Nutrition Handbook, 5th ed. American Academy of Pediatrics 2004

³ Poole et al Timing of Initial Exposure to Cereal Grains and the Risk of Wheat Allergy Pediatrics 2006 117,6 2175-2182

⁴ Norris et al Timing of initial cereal exposure in infancy and risk of islet autoimmunity JAMA 2003 290 1713-1720

OCT 27 2006

GP-396

October 25, 2006

Patricia N Daniels, Director, Supplemental Food Programs Division, Food and Nutrition Service
USDA
3101 Park Center Drive, Room 528
Alexandria, Virginia 22302
(703) 305-2746

Dear Patricia Daniels,

I am writing to you in regards to the draft that the Arizona Department of Health Services (ADHS), Office of Chronic Disease Prevention and Nutrition Services have proposed regarding the new WIC food packages to support good health and good habits among WIC participants I agree with the following recommendations that have been put forth by ADHS and would encourage you to support their recommendations

- 1 The decrease in the amount of milk given to the participants to closer approach the recommended intake In addition, fully endorse only allowing low fat (1%) or non-fat (skim) milk for participants 2 years old and older
- 2 The addition of soy beverages and tofu to give participants more food options for those with milk allergies or intolerances However, the state also requests the addition of some gluten free products for participants with wheat intolerances and the inclusion of lactose-free cheese in the list of WIC-eligible cheeses
- 3 The addition of whole grain food items that will increase whole grains in participant's diets and expand the cultural food options by offering substitutions
4. Decreasing the amount of fruit juice and the addition of fruits and vegetables, along with support for the use of WIC food instruments for use at Farmers' Markets However, requiring Farmers' Market to meet the standards of regular WIC vendors is not appropriate due to the higher requirements, which the majority of traditional Farmer' Markets will not be able to meet The state also agrees with IOM's recommendations of \$10 vouchers for women and \$8 for children to promote increase availability and intake of fruits and vegetables If the increased amounts cannot be given to all participants, a consideration of giving pregnant and breastfeeding mothers the \$10 voucher is recommended as an additional benefit.
5. The decrease in the amount of juice and adding jars of fruits and vegetables for infants.
- 6 The recommendation for Food Package I and II, the establishment of the three feeding options, and the reassignment of infants with a qualifying medical condition to Food Package III Thus allowing states to better serve participants with certain medical conditions with one food package to facilitate efficient management of fragile infants, children, adults, and special needs
- 7 The use of RTF formula to qualifying infants in Food Package III This not only accommodates the participant's medical condition for swallowing, but also addresses the issue of contamination in the non-sterile powder form for infants who are at risk for infection due to prematurity or immune system disorders
- 8 The option of offering baby cereal or breakfast cereal for the women, infants, and children in Food Package III

- 9 Allow for individual nutrition tailoring based on the Competent Professional Authority's assessment of a participant's supplemental nutritional needs.
- 10 The recommendation for providing formula for partially breastfeeding moms for the first month with the support of peer or breastfeeding counseling services to help moms overcome any barriers to breastfeeding, such as the mom's perception that they may have inadequate milk supply.

I am a current dietetic intern in the Yavapai County Community Health Services Dietetic Internship Program, and the concentration of our internship is community nutrition and WIC services. The department has been asked to increase the client knowledge of MyPyramid and the recommendations that are made by the USDA. The major recommendations are to increase the clients' daily intake of fruits and vegetables ("Fruit and Veggie . More Matters!"), increase whole grain consumption ("Make half your grains whole!") and choose low-fat or non-fat milk products ("Go Low!"). The support of the new food package would allow for our clients to meet the guidelines that have been set forth by our government. Studies by the U.S. Department of Health and Human Services, U.S. Department of Agriculture, and the National Academy of Sciences suggest that the nutritional goodness of fruits and vegetables, with a diet that is low in fat, saturated fat and cholesterol and that contains plenty of whole-grain breads and cereals, may decrease the risk of heart disease and cancer. The Arizona Cardiovascular Disease Prevention Program posted "Cardiovascular disease, which includes heart disease and stroke, is the leading cause of the death both nationally and in Arizona. In 2003, 30% of all Arizona deaths were a result of cardiovascular disease. Many of the risk factors for heart disease and stroke, including poor nutrition, physical inactivity and tobacco use, are behaviors that can be modified to prevent as well as delay the development of cardiovascular disease."

The cost of fresh fruit and vegetables compared to the price of junk food, fruit juices and processed foods is undeniably higher, therefore the need for fruit and vegetable vouchers to help supplement a WIC client's intake can be used to not only get them to increase their fruit and vegetable intake, but to also help contribute to good health of moms and babies. Through the recommendations of the new food package, the nutrition education that is taught by community nutrition workers (CNW's) and community nutritionists will have a greater impact on the health of our clientele.

Please contact me at (480) 205-1461 or by e-mail at jody.laidlaw@co.yavapai.az.us if I can provide you with more information.

Thank you,



Jody Laidlaw, Dietetic Intern
Yavapai County Community Health Services
1090 Commerce Drive
Prescott, AZ 86301

Annaleigh Olsen
643 East 500 North #7
Logan, UT 84321
435-851-9894
October 25, 2006

OCT 27 2006

REF Docket ID Number 0584-AD77-WIC Food Package Rule

GP-397

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, Virginia 22303

Dear Patricia,

REF Docket ID Number 0584-AD77-WIC Food Package Rule

I am writing this letter in strong overall support of the proposed regulations to improve the nutritional value of WIC food packages as well as allowing farmers' markets to be eligible vendors for the use of WIC vouchers. The application of this new regulation would be beneficial to WIC recipients by promoting healthier food choices that are more perceptive to the cultural and health needs of WIC clients. Along with this, I believe that there should be no limit to the type of fresh produce that could be purchased with the new fruit and vegetable coupons. I would also like to see farmers' markets be allowed to participate as seasonal vendors, and to be excused from the "WIC-only" cost containment requirements, as well as to not be entailed to carry a full-range of WIC food package products.

Please do not impair the WIC Farmer' Market Nutritional Program, and do not reduce funding or establish methods that would effect its effectiveness. I would also encourage states or tribal agencies that presently operate WIC FMNPs to coordinate the implementation of the new fruit and vegetable program with the WIC FMNP.

I believe that this new food package rule would be very beneficial and could prove to be very valuable to both farmers' market vendors as well as WIC families.

Sincerely,

Annaleigh Olsen

OCT 26 2006

October 25, 2006

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

GP-435

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

Dear Ms Daniels,

I am writing to you as a nutrition student and a concerned citizen in support of the proposed revisions of the WIC Food Packages. These revisions would keep the food packages within the 2005 Dietary Guidelines for Americans and also match the infant feeding recommendations of the American Academy of Pediatrics. These changes will help WIC do its part in reducing obesity and health problems related to poor nutrition and eating habits in women and children.

I also wish to encourage the USDA to complete its analysis of the comments on the Proposed Rule quickly in order to publish a Final Rule by mid-2007. WIC participants are aware of the proposed changes and looking forward to being able to use the healthier food products.

The cash vouchers for \$10 / \$8 per month for will be a tremendous help for WIC participants to eat fresh fruits and vegetables each day. The increased consumption of fruits and vegetables will provide more vitamins, minerals, and fiber than the calorie dense, high fat products of the past and assist in the overall battle against overweight and obesity. I urge the USDA to implement this change right away.

The new proposal will also provide stronger incentives for continued breastfeeding. By providing less formula to partially breastfed infants, there will be additional types and quantities of food for breastfeeding mothers.

The proposal to reduce the amount of juice and provide more infant foods for infants over 6 months will help get kids used to fewer sweets and more vegetables and other foods at ages recommended by the American Academy of Pediatrics. This will contribute to healthier eating habits for a lifetime.

The proposal to provide whole grain and soy options is also progressive and healthy, allowing WIC participants to have a wider variety of proven, health promoting food choices.

Including lower-fat milk and less cheese and eggs also assists WIC participants in getting enough calcium and lowers the amounts of saturated fats and cholesterol as per the current dietary recommendations

Again, I strongly support the proposed changes for the WIC Food Packages. These changes address the current obesity epidemic by encouraging healthier eating habits and food choices for low-income families. This proposal will help create healthier bodies for the women, infants and children of California.

Sincerely,

A handwritten signature in black ink, appearing to read "D Rudell", with a long horizontal flourish extending to the right.

Deborah Rudell
Nutrition Student and Concerned Citizen

OCT 31 2006

GP-438

October, 2006

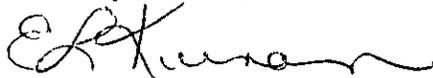
Patricia N. Daniels
Director, Supplemental Food Programs Division,
Food and Nutrition Service, USDA
3101 Park Center Drive, Room 528
Alexandria, Virginia 22302

Dear Ms Daniels,

I am writing to tell you what I think about the proposal to change the WIC food package. The proposed WIC food packages look great. Considering that the food pyramid has been revised based on the new data regarding a more healthy lifestyle, it only makes sense that you revise the WIC food packages to meet those healthy changes. I do however think the vegetables should be fresh or frozen. I personally believe they are healthier and more appealing to eat when they are fresh or frozen. I only use canned beans or corn in stews, soups or chili. A choice of soy beverages and lower fat milk is healthier for both nursing mothers and children. Since most juice is high in sugar, eliminating it for infants is also a good idea. Whole grains are very important in everyone's diets, the choices in the proposed package are perfect for providing this necessary food item. It would be nice to have WIC provide a great balanced food package reflecting these healthy choices.

Thank you for considering my comments.

Sincerely,



Erin Kiernan
1145 Route 74 E
Shoreham, Vermont
05770

OCT 30 2006

October 24, 2006

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

GP-441

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

Dear Ms Daniels,

I value this process of allowing comments on the proposed WIC regulations and would like to commend you on your acceptance of this responsibility to decipher all the input. It is admirable to consent to take on leadership role that potentially affects 8.2 million mothers and growing children. I can speak from the position of being one mother that has benefited from the WIC program personally.

I vividly remember the huge amounts of milk and juice coupons provided. I really had to effort to find ways to utilize the large amounts of fresh milk. I am not sure my pudding alternative would be considered a healthy choice. I know WIC does not want to further contribute towards the obesity epidemic since nutrition education is its primary goal. I assert that many other WIC participants may also not be milk drinkers beyond cereal, like myself.

Also, translating the juice coupons into stock available sizes and brands is quite a feat for an English-speaking mother. I cannot imagine how difficult it would be with a language literacy barrier. I knew the 100% juice was healthier than juice type substitutes, yet I could barely find freezer space at times for the more than ample supply.

My recommendation would be to reduce the amount of milk and juice and replace it with high fiber sources, such as fruits and vegetables that are not packed in heavy syrup, along with whole grain bread and cereal options.

Please support a timely decision, as I know several nutrition professionals who have been actively working on this for more than ten years. It is time to change the American diet from liquid calories to chewable food sources.

Sincerely yours,



Susan Klucker (Flint)
4471 Glines Avenue
Santa Maria, CA 93455
(805) 938-5880

OCT 31 2006

82 Mountainside Drive
Antrim, NH 03440

GP-464

October 26, 2006

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

RE 7 CFR Part 246

Dear Ms. Daniels

I am writing to express my delight with the proposed changes to the current WIC program. This program has continued for too long without needed adjustments to remain current with advances in scientific research. I am very excited about the bold steps this program is planning on taking because it has a wonderful potential for improving many American's lives. I support the proposed program because it incorporates many important modifications to the food packages.

The most important modification to the WIC program is the increased effort to encourage breastfeeding among mothers. By both providing older infants with an increase in baby food amounts, and higher quantities of food with more variety for the mother, the program is providing an incentive for mothers to breastfeed their infants. This modification is in line with current dietary practices that have established breastfeeding as the gold-standard for infant feeding. It is important that all women capable of breastfeeding are both encouraged to do so and provided with the support needed. This is a wonderful modification but I am unable to fully support it because it may create problems with the partially breastfeeding mother/infant pair. By drastically reducing the quantity of formula provided, mothers may be forced to switch from partially breastfeeding to fully formula feeding for financial concerns. Mothers may not have the luxury of breastfeeding their infant or pumping as often as required to maintain a large enough milk source. If mothers do decide to follow the partially breastfeeding path there is a potential for problems to arise if the mother is unable to maintain her milk and cannot afford to purchase formula. I feel that by reducing the formula quantity by such a large percent that mothers on the fence about partially breastfeeding versus formula feeding will decide upon fully formula feeding for fears of having to supplement additional formula at their own expense.

An additional strong point is the elimination of fruit juice for infants and the reduced amount for children and women. This is very important because of over consumption of these and other high sugar beverages in the US population. A high consumption rate would put an individual at risk for health problems such as tooth decay and weight gain. The concept of switching to either baby food fruits and vegetables, or fresh/canned fruits

and vegetables for children and women is extremely beneficial. These foods are important because they contain important vitamins and minerals along with fiber. A problem that may result with this modification is the logistics of how recipients will get the fruits and vegetables. This area needs further consideration before supporter buy in can be obtained. One further suggestion to the above modification would be to include an option for the selection of frozen fruits and vegetables.

The alterations of the grain products were also innovative modifications. Not offering cereal to infants until the sixth month was wise because of problems that can arise as the result of introduction at younger ages. Changing the bread to a whole grain variety was good because of the health benefits along with increased levels of fiber. Offering alternative whole grain options provides the opportunity for additional variety within the diet. I feel that this encouragement of whole grains will establish a good stepping stone for participants to make healthier choices in the future.

Offering varied possibilities for protein helps make the WIC package more appealing to a greater number of people. Including items as substitutions for milk such as soy milk and tofu offer a greater selection to those unable to consume milk and offers appeal to diverse populations. This makes the program as a whole stronger and provides choices to participants. The move towards accepting both canned and dried beans further strengthens this area. I feel that few people have the time or willingness to soak beans but would try incorporating them if they were in a more convenient form. Adding beans to the diet is an excellent way to add protein along with fiber and is also acceptable to both vegetarians and vegans. Mandating that dairy products be of the reduced fat variety will help to eliminate some saturated fat from participant's diets and better matches the new dietary guidelines.

In closing, I congratulate all of you on the hard work that has gone into the revisions of the current WIC program. I firmly believe that this is a strong document that will help guide the WIC program for many years to come. I hope that in the future this program will be capable of remaining current with scientific practices and continue to take bold steps in assuring the health of many Americans.

Sincerely,

A handwritten signature in cursive script that reads "Erin M. Campbell". The signature is written in black ink and is positioned above the printed name.

Erin M. Campbell

Aimee Boswell
24513 S Mohler Rd Ripon, Ca 95366
October 30, 2006

NS - 304

GP-485

Dear Ms Daniels

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

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

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

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

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

- Increase the fruit and vegetable benefit by \$2 to fully meet the recommendations of the Institute of Medicine for women and children in WIC

- Allow WIC participants to choose the kinds of fruits and vegetables they want
- Allow WIC participants to choose healthy and culturally appropriate cereal by revising the proposed cereal standard to include whole grain corn-based (i.e. corn flakes), rice (i.e. puffed rice) and bran (i.e. bran flakes) WIC cereals
- Remove the requirement for children to have a prescription to obtain soy milk from WIC
- Maximize access to Farmers' Markets and the WIC Farmers' Market Nutrition Program for local seasonal fruits and vegetables.
- Establish WIC state advisory councils of stakeholders to help support and inform the planning and implementation of the new food package

Thank you for this opportunity to share my support for the healthy WIC food packages and my recommendations to make them stronger still I hope USDA will act quickly to issue the new food packages

I am student at SJSU and am very interested in the importance of high-quality nutrition for infants and children.

Sincerely,
Aimee Boswell

17 Pine Ledge Dr
Scarborough, ME 04074
(207) 632-9837

October 31, 2006

GP-487

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,

My name is Tricia Penley, and I am currently enrolled as a dietetic intern at the University of New Hampshire. I am writing concerning the proposed changes to the current WIC food packages. As a program that provides assistance to families in need, it is important to keep up with changes that have been implemented in dietary guidelines. While many of the proposed changes will have a positive affect, I believe some may still need revisions.

I am in support of most changes made to the infant food packages. The changes in qualifying age are better with regard to when cereals, fruits, vegetables and meats are introduced. By changing the first food package to birth to five months of age instead of just three, it pushes back the age at which parents receive checks for access to cereals. In doing this, I believe it will decrease the chances of parents introducing cereals earlier than their infants' bodies can handle them.

I have some concerns regarding the changes for partially breastfed infants. While not offering an IPB option for the first month may encourage mothers to breastfeed, it may also force other mothers to go straight to formula in order to get the amount they need. For food package II, I am in full support of the deletion of juice. Parents are commonly providing their children with too much juice too early, which results in added calories and sugar that they don't need. This change will help them understand that their child doesn't need more than 4 ounces each day.

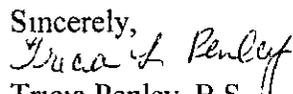
I am in favor of the changes to less milk, juice, eggs, and cheese in the packages for both children ages 1-5, and packages for mothers. I am also impressed with the restriction of whole milk after age 1, the requirement of 51% whole grains, and the available soy or tofu substitutions. This is a great way to implement the new dietary guidelines, and to also appeal to more diverse populations. The one problem that I have with package V is that the food package is based on the amount of infant formula received for the baby. This is a somewhat confusing element of the revision. It would be helpful if the change were a little more specific. One suggestion would be to specify the maximum amount of formula allowed before the mother no longer receives checks, for example, if the baby is receiving 6 cans or more of formula the mother will no longer receive checks. What I do

like about the change is that when mothers no longer qualify, they are still able to stay in the computer for when they need nutrition advice or referral.

While the addition of fruit and vegetable vouchers is certainly a wonderful idea, I am concerned that \$6 and \$8 will not be enough. In August, my dietetic intern class did a study on the cost to eat according to the MyPyramid menu. We collected data from two separate stores within 1 mile of each other, and found that the cost of fruits ranged from \$5.76 to \$12.26 per week, and the cost of vegetables ranged from \$7.60 to \$17.53 per week. These costs are based on the high and low price per product between the stores. While many of the products we researched were fresh, it's still safe to say that \$6 or \$8 per month for fruits and vegetables is hardly enough, fresh or not. I understand that increasing the amount of money in the vouchers would prevent cost neutrality in the changes, but I really feel that clients would benefit from more access to fruits and vegetables.

Overall, I would say that any changes to improve the health of clients are beneficial. I am pleased to see that the USDA is making an effort to improve the nutritional value of food packages. To see that the proposed changes will decrease both total fat and saturated fat, as well as decrease sodium and increase fruits and vegetables is very impressive.

If there are any questions, I will be more than willing to answer them. I can be reached at the address and telephone indicated above. Thank you for your time in considering my opinions.

Sincerely,

Tricia Penley, B.S.
UNH Dietetic Intern

NOV - 3 2006

9740 South Pulaski Road
Unit # 202
Oak Lawn, IL 60453

GP-512

November 2, 2006

Patncia N Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
U S Department of Agriculture
3101 Park Center Drive
Room 528
Alexandria, VA 22302

Dear Ms Daniels,

Thank you for the opportunity to provide comments on the USDA's proposed regulations that substantially revise the WIC Food Packages, published in the Federal Register on August 7, 2006. I am writing to express my support of the proposed revision of the food packages for the Special Supplemental Nutrition Program for Women, Infants, and Children.

As a dietetic intern of Loyola University Chicago and Master's Degree candidate, I am exposed to many different facets of nutrition. My interest in nutrition was further enhanced through my culinary education at Johnson & Wales University. I am particularly interested in community nutrition and am excited for the proposal.

This timely revision would reflect current dietary recommendations needed, particularly for clients needing financial assistance in order to meet nutrition requirements. In addition, I am pleased to see that the rule reflects recommendations made by the Institute of Medicine (IOM) report, *WIC Food Packages: Time for a Change*. Currently, it is very difficult for nutrition educators to reinforce nutrition messages for parents and children without updated packages. This proposal finally brings the WIC Food Packages in line with current dietary science to allow nutrition educators to further enhance their nutrition messages.

Based on the planning and implementation issues involved with so many major changes to the WIC foods, I urge the USDA to conduct its analysis of the comments on the Proposed Rule quickly and efficiently, and publish an Interim Final Rule by mid-2007 at the very latest.

Again, I enthusiastically and strongly support this Proposed Rule for WIC's revised food packages. The addition of soy products, whole grain bread and other grains, and lower-fat milk and less cheese and eggs provides benefits of lowering saturated fats and cholesterol while increasing calcium and fiber and is consistent with the *2005 Dietary Guidelines for Americans*. This will provide WIC clients with better nutrition and allow nutrition educators to provide education that corresponds with the updated food packages.

Thank you for your time and immediate attention in this matter.

Sincerely,



Elizabeth Verzo

NOV - 3 2006

November 3, 2006

GP-513

113 Spring Creek Drive
Mosca, CO 81146

Patricia N Daniels
WIC Director, FNS/USDA
3101 Park Center Drive, Room 528
Alexandria, VA 22302

RE Docket ID Number 0584-AD77

Dear Ms Daniels.

I believe the WIC program is one of the most cost effective and efficient programs our country has to promote health for low-income mothers, infants and children. Thus, I am writing to support USDA's proposed new WIC food packages rule because it will improve the health and nutritional quality of the foods offered, expand cultural food options, and increase food choices. WIC needs to update the packages to enable mothers and children maintain a healthy weight and allow them to make healthy food choices.

I think it makes sense to add fruits, vegetables, whole grain bread, corn tortillas, and the option of soymilk and tofu, and to move to low-fat milk and whole grain cereals.

I support the following recommendations to strengthen the proposed rule to ensure that WIC participants can get the full value from the healthy new WIC food packages:

- Increase the fruit and vegetable benefit, and allow WIC participants to choose the kinds of fruits and vegetables they want. Also, maximize access to Farmers' Markets for local seasonal fruits and vegetable; this is a great community-based program!
- Allow WIC participants to choose healthy and culturally appropriate cereal by revising the proposed cereal standard to include whole grain corn, rice and bran cereals.
- Remove the requirement for children to have a prescription to obtain soy milk.

Thank you for your consideration of my support for the healthy WIC food packages and the recommendations to make them stronger still.

Sincerely,



Suzanne DeVore

NOV - 3 2006

November 2, 2006

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

GP-576

**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 myself, Crystina Cruz, a nutrition student at San Diego State University, I am pleased to support these long-awaited reforms.

Since 1969, many low-income families have been given the opportunity to live healthful lives through the WIC program. Developments in nutritional science have led to a more advanced understanding of consuming a healthy diet. In 2005 a revised version of the Dietary Guidelines for Americans was released. The Dietary Guidelines emphasize the importance of consuming healthier foods, especially fruits and vegetables. The introduction of vouchers for fruits and vegetables will greatly benefit the health of so many families in the WIC community.

Recently, the Institute of Medicine (IOM) in their report, "WIC Food Packages: Time for a Change" has recognized the need to adjust the current Food Packages to include fruits and vegetables. IOM recommends a cash-value voucher for \$10/month and \$8/month. However, the proposed rule will reduce this amount to \$8/month and \$6/month, as a way to encourage timely implementation.

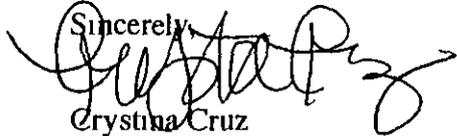
The proposed changes also include a reduction in certain foods such as milk, eggs, cheese and juice. I support these changes as they coincide with the 2005 Dietary Guidelines for Americans and the recommendations of the American Academy of Pediatrics. Specific goals for these changes are

- To increase the number of continued or partial breastfeeding mothers by limiting the amount of formula and by offering greater food incentives. Therefore, I urge the USDA to increase the cash-value vouchers to the amount recommended by the IOM.
- To introduce infants at 6 months of age to fruits and vegetables as recommended by the American Academy of Pediatrics. The reduction in the amount of juice given will greatly encourage parents to follow this suggestion.
- To better serve the diverse culture of California by offering whole grain and soy options.
- To reduce the amount of saturated fats and cholesterol by encouraging lower fat milks and offering less cheese and eggs. This change will follow the current dietary guidelines which equate adequate calcium intake with better health.

The WIC community and I strongly support these changes. And so I urge the USDA to conduct its analysis of comments in an appropriate timeframe, and publish a Final Rule by

mid-2007 at the very latest. State and local agencies are excited about this Proposed Rule and look forward to implementing this new change

I am grateful that the USDA is open to comments and I thank you for giving low-income families a chance to live healthier lives. I hope to work in community dietetics and have the opportunity to make a difference in the lives of many Americans as the USDA is doing today

Sincerely,


Crystina Cruz
Foods and Nutrition Undergraduate,
San Diego State University

04/07 - 9 2006

GP-513

11-31-06

Vail, Ia

Dear Sir:

I am writing in concern of the proposed change in the wic program.

I am a cashier at a major grocery store + I handle many of these wic transactions. It is a very good program I don't think you should lower the amount of milk or juice they are receiving. How many children under 5 eat fruit or v. I'd eat fruit just because the govt thinks they should.

In speaking to the recipients of these wic checks they definitely want to keep the amount of milk they are getting.

Sincerely
Norma Rucke
Vail, Ia 51465

NOV 04 2006

4022 Parkside Drive
Seaford, NY 11783
October 14, 2006

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

GP-563

Dear Mrs Patricia N Daniels

My name is Amanda Julian I am a dietetic intern from New York interning at the Nassau County WIC in New York. From my experience working at WIC I see it helps many people The participants are very grateful for the food package and education that they receive when they are there

I am glad that the food package is in its stage of change I was reading the new food package and think it's great I think its very necessary to eliminate juice and add fresh fruits and vegetables I feel most of the participants can not afford fresh fruits and vegetables Whole grains are also a plus added to the food package, this is a healthy choice Finally, taking away whole milk and 2% milk is great. I see that most participants are drinking whole or 2% milk and are a little apprehensive of trying 1% or non fat milk I am glad that WIC is giving 1% or non fat. This food package is great

Sincerely,



Amanda Julian

NOV 04 2006

334 North 500 East
Logan, UT 84321
24 October 2006

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria Virginia 22303

GP-565

Dear Ms Daniels

REF Docket ID Number 0584-AD77-WIC Food Package Rule
I am a student attending Utah State University interested with the new WIC rules that may benefit both the WIC (Women, Infants, and Children) participants and the Farmer's Market. I understand that the U.S. Department of Agriculture (USDA) has proposed a regulation improving the nutritional values of the women, infants and the children participating in the WIC program. With this new program, if allowed, fruits and vegetables will be implemented in the diet for mothers and children benefiting from the program. This change may bring many benefits to many groups of people not only including the improved health of participants of WIC but also to the local food advocates and farmers' markets.

Current studies show that obesity is a very serious health hazard and obesity rates are increasing. Obesity, along with improper dietary patterns, have become significant concerns for many in the WIC programs. In reducing the amounts of dairy, egg, and fruit juices, which are high in fats and calories, and adding more fruits and vegetables, we will gain a better nutritional standard with less fat, but still have the benefits of nutrient-dense foods. Not only does the proposal offer better nutritional varieties, but it also allows the produce to be purchased at farmers' markets. Even so, there should be no restrictions to the types of fresh fruits and vegetables that may be available to WIC clients. Farmers' markets should be able to participate as seasonal vendors and not have to be required to carry the WIC food package products. This allows the farmers to provide fresh seasonal items without the hassle of certain guidelines while allowing the WIC participants to choose from a variety of nutritional items.

Women and children will receive vouchers that can be used to purchase only fruits and vegetables at WIC eligible food vendors. Farmers markets will have to be authorized to be eligible vendors. Many concerns among farmers' market folks regarding the position of Farmers Market Nutrition Program (FMNP) have risen. Farmers' market vendors may fear that the new WIC fruits and vegetables program may eliminate the FMNP. There are no intentions to ever reduce FMNP funding or interfere with its operations or effectiveness. In fact, the new rules are designed to uphold existing FMNP guidelines and practices. The FMNP can also increase the value of the new program to both WIC participants and farmers.

I feel very strongly about this issue and feel this program will benefit those that are involved with the new WIC rules. Writing to you has benefited me by allowing me to portray my feelings about this topic. Thank you for taking the time and effort to read this letter on my behalf.

Sincerely yours,
Melinda Peterson

NOV 03 2006

Richard Blodgett
949 Aberdeen NE
Grand Rapids, MI 49505

November 3, 2006

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

GP-577

Ms. Daniels,

I am writing to you in response to the USDA's proposed changes to the food packages provided to low-income women and children by the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC Program). My specific interest in this program is with the feeding of infants under the age of six months

I have been donating infant formula to non-profit organizations here in West Michigan for over 15 years. I retired four years ago after a 30 year career in the auto industry. I have no formal affiliation with any of the government agencies, professional organizations, retail stores, or non-profit organizations cited in this letter.

I would like you to know that I am well aware of the benefits of breastfeeding. The number of low-income breastfeeding women has remained stubbornly low, but at least the upward trend is in the right direction. Although the primary focus of this letter is on fully formula-fed infants, I have reviewed the proposed changes to the WIC food packages for breastfeeding and partially breastfeeding mothers and infants and I hope they are successful in encouraging more women to breastfeed.

When low-income mothers elect to formula feed, they may qualify to receive infant formula from the WIC Program. Since early 2002, WIC participants have been receiving less infant formula than allowed by WIC Program rules. This was brought about by the infant formula manufacturers who changed the size of their powdered formula cans. The maximum amount of powdered infant formula that a WIC participant is currently

allowed to receive per month is 128 dry ounces. Ten 12.9 ounce cans of the powdered formula produced by Ross Pediatrics, equals 129 ounces, a mere one ounce over the 128 ounce monthly limit. Nine cans of the 14.3 ounce powdered formula produced by Mead Johnson, equals 128.7 ounces, less than one ounce over the 128 ounce monthly limit.

In response to the problem created by the infant formula manufacturers, Congress **unanimously** approved a provision in The Child Nutrition and WIC Reauthorization Act of 2004 which would allow states to “round up to the next whole can of infant formula to allow all participants under the program to receive the full-authorized benefit specified by regulation.” The “rounding up” provision would allow the states to exceed the maximum monthly limit of 128 dry ounces of powdered infant formula. That “rounding up” policy was to be implemented as each state negotiated a new formula rebate contract with a formula manufacturer.

States have only recently negotiated new rebate contracts with formula manufacturers. I have been told by several state WIC directors that they doubted that the Federal government would provide the additional funding to pay the increased cost brought about by a new formula rebate contract so they elected to extend their existing formula rebate contract. Since the “rounding up” provision could only be implemented under a new formula rebate contract, **not one state** to my knowledge has put the “rounding up” provision into practice and WIC mothers across the country continue to receive **less** than the “full-authorized benefit specified by regulation.” This is particularly aggravating due to the fact that the U.S. Senate Appropriations Committee “strongly encouraged” the USDA in **July, 2002**, “to allow State WIC agencies to round up to the next whole can size of infant formula to ensure that all infants receive at least 8 lbs. or 128 ounces of powdered infant formula, or 944 reconstituted fluid ounces, at standard dilution, per month.”

I must point out here that the consistent losers in the ongoing battle between the formula manufacturers, the U.S. Congress, and the USDA, have been the WIC mothers and their infants.

In order to explain the additional problems outlined below, I need to make the distinction between two types of infant formula:

- Concentrated infant formula is mixed with an equal amount of water. Thus, a 13 ounce can of concentrated infant formula will yield 26 ounces of reconstituted formula.
- Powdered infant formula is also mixed with water. The mixing instructions on the labels of different brands of powdered infant formula call for slightly different amounts of water when it is prepared for use. For example, when mixed as directed, a 12.9 ounce can of milk-based powdered Similac formula will yield 95 fluid ounces of reconstituted infant formula. A 12.9 ounce can of soy-based powdered Isomil formula will yield 94 fluid ounces of reconstituted infant formula when mixed as directed. According to a report issued by the Government Accountability Office in March, 2006, [GAO-06-380] in 29 states responding to a GAO survey, sixty six percent (66%) of the formula provided by the WIC Program in those states is powdered formula.

On April 27, 2005, the Institute of Medicine released their “WIC Food Packages, Time for a Change” report. Throughout their report [see the IOM report pages 6, 93, 113], the IOM states that, if their proposals are implemented, the monthly amount of infant formula provided to fully formula-fed infants under 4 months of age, will not change. While it is true that the amount of **concentrated** infant formula proposed by the IOM would not change, the amount of **powdered** infant formula the IOM has proposed is a **decrease** from the amount currently allowed by Federal regulation. That proposal would have a negative impact on the **66%** of WIC infants under the age of 4 months who are fully formula-fed and receive **powdered** infant formula from the 29 state WIC programs that are cited in the March, 2006, GAO study.

The IOM has also proposed a target amount of 884 fluid ounces of infant formula per month for fully formula-fed WIC infants 4 months through 5.9 months of age, a 2 month period. If the “rounding up” provision, which was passed **unanimously** by Congress in 2004, had been put into practice, fully formula-fed WIC infants in this age category would now receive slightly over 128 dry ounces of powdered formula. The “rounding up” provision would have allowed State WIC agencies to provide WIC participants with ten of the 12.9 ounce cans of powdered formula produced by Ross Pediatrics, or nine 14.3 ounce cans of the powdered formula produced by Mead Johnson, depending upon which formula manufacturer the state had a formula rebate contract with. In either case, the amount of powdered formula

allowed after “rounding up” to the next whole can of powdered formula would reconstitute to over 940 fluid ounces per month. Thus, the 884 fluid ounces of reconstituted powdered infant formula proposed by the IOM for infants in this age category is also a **decrease** in the amount WIC participants would have received as the “rounding up” provision was implemented by the states.

On August 7, 2006, the U.S. Department of Agriculture published their proposed set of new rules for the WIC food packages in the Federal Register. The USDA’s proposals are even more creative than the IOM’s in their method of reducing the amount of infant formula for fully formula-fed WIC infants under six months of age. The USDA is proposing a slick mathematical equation which will permanently **reduce** the amount of powdered infant formula for WIC infants under six months of age. The new amount of powdered infant formula being proposed is even **less** than the problematic amounts WIC participants currently receive as a result of the change in the size of powdered formula containers. Also, 96 fluid ounces of juice and 24 ounces of infant cereal are currently provided to WIC infants starting at 4 months of age. The changes to the WIC food packages which have been proposed by the USDA would eliminate both juice and infant cereal for infants 4 through 5 five months of age... a further **decrease** in WIC benefits for these infants.

The scientific information used by the IOM and the USDA to justify their proposed reductions in the amount of powdered infant formula for fully formula-fed WIC infants seems to be less than scientific. The 1994-1996, and 1998 Continuing Survey of Food Intakes by Individuals [CSFII] studies cited by the IOM and USDA as the scientific foundation of their proposed reductions to the WIC food packages for fully formula-fed infants under the age of six months, used the dietary recall method of data collection. These two studies used a combined total sample size of 350 infants under the age of 7 months to reach their “scientific” conclusions. In a white paper published by the American Dietetic Association [available online at http://www.eatright.org/cps/rde/xchg/ada/hs_xsl/advocacy_2847_ENU_HTML.htm], the ADA states, “Most experts agree that a minimum 5,000-person sample with two days of dietary recall is required to provide the level of certainty needed to have useful data.”

Table F-1, on pages 360-363 in the IOM’s “WIC Food Packages, Time for a Change” report does not list adequate intake levels for infants for iron, zinc,

selenium, magnesium, phosphorus, sodium, and potassium. Footnote 'a' on page 362 states, "Adequate intake levels for formula-fed infants ages 0 to 5.9 months have **not** been set for these nutrients, although bioavailability of some nutrients, especially iron and zinc, is known to be lower in infant formula than in breast milk." Table F-2, on page 364 in the same report, indicates that **no** tolerable upper intake levels for infants 0 through 5 months have been set for eight of the ten vitamins listed. I'm wondering what specific scientific information the USDA used as a basis for proposing a reduction in the amount of powdered infant formula for fully formula-fed WIC infants under the age of six months?

On page 5-5 in the IOM's phase I study "Proposed Criteria for Selecting the WIC Food Packages," the IOM acknowledges:

"Low birth weight, failure to thrive in infants, and underweight in children can be serious problems (AAP, 2004). The prevalence of undernutrition is low in the general U.S. population (Wang, et al., 2002); however, the low-income population (ie., the WIC-eligible population) may be both most vulnerable to undernutrition and most vulnerable to significant impacts when undernutrition does occur."

That increased risk factor among the WIC-eligible population is an appropriate reason to keep the amount of powdered infant formula for fully formula-fed WIC infants under the age of six months at 128+ dry ounces, as allowed by the "rounding up" provision in the Child Nutrition and WIC Reauthorization Act of 2004.

On September 15, 2003, the U.S. Food and Nutrition Service published an Advanced Notice of Proposed Rulemaking seeking comments on revisions to the food packages offered through the WIC Program. The FNS solicited public comments to determine if the WIC food packages should be revised to better improve the nutritional intake, health and development of participants and, if so, what specific changes should be made to the food packages. On December 15, 2003, in response to that advanced notice, Dr. Carden Johnston, the President of the American Academy of Pediatrics, wrote a letter to Patricia Daniels at the FNS (letter #PI-36 in the Public Interest Comment Letters section) In his letter, under the heading "Adjustments to quantities – How much & why", Dr. Johnston wrote the following, "The AAP recommends that WIC consider adjusting the amount of infant formula provided to children under the age of 6 months. The amount of formula provided [assuming WIC is the only source] may be

inadequate to support the growth of an infant growing at the 50th percentile beyond 2-3 months of age and this may encourage dilution of formula.”

As the U.S. Congress contemplated numerous issues which evolved into the Child Nutrition and WIC Reauthorization Act of 2004, two presidents of the National WIC Association testified at Congressional hearings. On April 3, 2003, Jill Leppert testified on behalf of the NWA at a hearing of the Senate Committee on Agriculture, Nutrition, and Forestry. Ms. Leppert’s statement can be viewed online at:

<http://agriculture.senate.gov/Hearings/03ap3lepp.pdf> In addition to being the NWA President at the time she testified, Ms. Leppert was also the Nutrition and Breastfeeding Coordinator at the North Dakota WIC Program. Included in Ms. Leppert’s statement to the Senate was the following:

“Among the Federal Regulations related to the competitive bidding requirement are regulations which potentially put formula fed WIC infants at health risk. These regulations set a maximum amount for infant formula to be issued to WIC participants each month at a rate of 8 lbs. (3.6 kg) per 403 fluid ounces of concentrate for powdered formula. Infant formula manufacturers offer powdered formula in a variety of can sizes, which they change periodically.

Because the maximum amount can not be exceeded and because the powdered can size variations rarely exactly match the authorized amount, WIC clients are provided less formula and nutrition benefit than they are authorized to receive. To avoid a substantial, cumulative shortage over the certification period and potential health risks, NWA recommends that USDA allow State WIC agencies to round up to the next whole can size of infant formula to ensure that all infants receive the full-authorized nutritional benefit of at least 944 reconstituted fluid ounces, at standard dilution, per month for powdered infant formula.”

Later in 2003, on July 16, Betsy Clarke, the newly appointed president of the National WIC Association, appeared at a U.S. Congressional hearing before the House Committee on Education & the Workforce, Subcommittee on Education Reform. Ms. Clarke’s statement can be viewed online at:

<http://edworkforce.house.gov/hearings/108th/edr/childnutrition071603/clark.htm> At the time of her testimony, Ms. Clarke was also the Minnesota State

WIC Director. Ms. Clarke's testimony echoed the statement made by Ms Leppert in April, 2003.

Contrary to the advice of Dr. Johnston and the American Academy of Pediatrics, the USDA is proposing a reduction in the amount of powdered infant formula in the food packages for WIC infants under the age of six months. The maximum average monthly amount of reconstituted powdered infant formula proposed by the USDA for fully formula-fed WIC infants from birth through 3 months of age (a 4 month period) is **806** fluid ounces. The maximum average monthly amount of reconstituted powdered formula being proposed for infants from age 4 months through 5 months of age (a 2 month period) is **884** fluid ounces. When using the proposed rounding up methodology as explained in Exhibit H on page 44795 in the Federal Register, the proposed **average** monthly amounts of reconstituted powdered formula are well below the **944** minimum reconstituted fluid ounces of powdered formula per month which were suggested by Ms. Leppert, Ms. Clarke, and the National WIC Association.

The reduction in the amount of infant formula being proposed by the USDA for WIC infants has the potential to cause significant health and developmental problems for infants from low-income households. **There is more troubling news that you need to know about.** Within the last several months, most large retail food store chains throughout the U.S have stopped selling their basic milk-based and soy-based **store brand** powdered infant formulas in 16 ounce cans. These stores include Meijer, Target, WalMart, Kroger Stores (Smith's, Fry's, King Soopers, and Dillon stores), Walgreens, and others. Most outlets of these stores now sell their own brand of powdered formulas either in larger containers or with DHA & ARA added, both of which are higher in price than the basic 16 ounce store brand powdered formulas which they no longer sell. All of the remaining powdered infant formula choices sold at these stores are more expensive options for individuals who wish to donate infant formula to non-profit food pantries. **It is inevitable that there will be fewer containers of infant formula donated to food pantries throughout the United States because of this marketing change.**

As a long time donor of infant formula, I know from personal experience that WIC mothers rely on food pantries as a source of infant formula when the formula they receive from WIC runs out before the end of the benefit month. The change in the type of powdered infant formula sold at large

retail stores has already affected the amount of powdered infant formula I will be donating. Not only will food pantries have less infant formula to provide to low-income mothers because donations decrease, but the change will also mean that low-income mothers will no longer have the more affordable basic store brand formulas available to them as a suitable alternative to the more expensive national brands when it becomes necessary to purchase formula to fill the void left by the decrease in formula provided by WIC.

In their **1992** position paper entitled “The Role of Infant Formula in the WIC Program,” the National Association of WIC Directors included the following precaution which has not lost its relevance:

“Removing infant formula from the WIC food package could increase the use of cow’s milk for infant feeding because commercial infant formula is so costly. Some mothers would purchase formula but could not afford to purchase a sufficient supply of formula and may overdilute it, unintentionally causing water intoxication in their infant. The net effect of removing infant formula could be an increase in the risk of inadequate nutrition, including iron-deficiency for thousands of infants and health problems related to water intoxication.”

The WIC mothers who have already committed to formula feeding will now be faced with several options:

- a. Water down the formula so the WIC allotment lasts until the end of the month.
- b. Use their already scarce resources to buy formula which is now more expensive because the large retail stores no longer sell their basic store brand powdered infant formula in 16 ounce cans
- c. Get formula from a non-profit organization which will become increasingly difficult because non-profit food pantries will be receiving fewer containers of powdered formula, as explained previously in this letter.

The goal of promoting the consumption of fruits and vegetables via the new WIC fruit and vegetable vouchers is admirable. However, I would like to offer the following thought as a means of perspective. The entire monetary gain from the addition of \$8 fruit and vegetable vouchers provided to women participating in the WIC Program, whose infants are formula-fed, will be offset by the retail value of the powdered infant formula taken away

from fully formula fed WIC infants under the age of six months in the USDA's proposed food packages

It is vitally important that the USDA allow fully formula-fed WIC infants under six months of age to receive a minimum of 944 fluid ounces of reconstituted **powdered** infant formula per month, as suggested by the National WIC Association in 2003. The minimum amount of reconstituted **concentrated** infant formula should be increased to at least 936 fluid ounces per month for those fully formula-fed WIC infants under six months of age who receive this type of formula from the WIC Program. Providing these amounts of powdered and concentrated formulas is even more important in light of the fact that there will be fewer containers of infant formula available to low-income mothers and infants from non-profit food pantries, as I have explained above.

The WIC Program has a solid reputation for delivering valuable services and benefits to low-income American families. The USDA should not be asked to do the impossible when given the assignment to upgrade the WIC food packages without additional monies to do so. Both the Executive and Legislative branches of the Federal Government must demonstrate their support of the WIC Program by providing the funding necessary to positively influence the nutrition of low-income Americans through the WIC Program.

Sincerely,



Richard Blodgett

NOV - 4 2006

November 1, 2006

GP-578

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

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

Dear Ms. Daniels

Please consider the following comments

- 1 Allow tofu and soy milk without medical documentation
2. Add yogurt but limit the size container to larger less expensive sizes
- 3 Require EBT or debit card technology for cash benefits ~ the purchase of fruits and vegetables
4. Extend the implementation period to 3 years
- 5 Disallow infant formula and re-direct funding to support lactation support Allow infant formula only when medical reasons for not breastfeeding are documented
- 6 Allow for the conversion of food funds to NSA when breastfeeding rates reach an established threshold. Require the converted funds be used for lactation support

Thank you for your consideration.

Sincerely,



Rebecca Waite
P.O Box 2107
Shelton, WA 98584

WIC - 6 2006

6305 Cardinal Hill Place
Springfield, VA 22152

5 November 2006

GP-580

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

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

Dear Ms Daniels,

As a concerned citizen, I strongly support the U.S Department of Agriculture's (USDA) efforts to improve the nutritional quality of the WIC food packages. As USDA finalizes the regulations, please consider the following suggestions to further strengthen the final rule.

Most importantly, I encourage USDA to provide the full fruit and vegetable benefit as recommended by the Institute of Medicine. I support the promotion of whole grains in the revised food packages, and limiting sugars in WIC cereals.

In addition, bringing the quantity of milk in the WIC food packages in line with the Dietary Guidelines is an important part of the proposed rule. However, I recommend that USDA require that all milk in the food packages for children ages 2 to 4 years and women be low-fat (1%) or fat-free (skim) to help to reduce saturated fat intake and harm to children's hearts and arteries. And, I support the proposed rule regarding allowing soy "milk" and calcium-set tofu as substitutes for milk--without requiring a doctor's prescription.

I strongly support the proposed reductions in the quantities of cheese and eggs in the food packages to decrease saturated fat and cholesterol intake, and urge USDA to require all cheese offered in the food packages to be light, reduced, or low in fat.

Overall, I strongly support USDA's proposed rule for updating the WIC food packages, and urge USDA to publish the final rule promptly, by spring 2007 at the latest, to bring these improvements to WIC participants as soon as possible.

Sincerely,



Patrick M Shaw

NOV - 3 2006

August Schumacher Jr
1332 29th Street N.W.
Washington, DC 20007

Date November 3, 2006

Ms Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of agriculture
3101 Park Center Drive Room 528
Alexandria, Virginia 22303

GP-581

Dear Ms Daniels

REF Docket ID Number 0584-AD77-WIC Food Package Rule

I am writing to strongly support the proposed revisions in the WIC food packages as proposed by USDA. As former Commissioner of Food and Agriculture in Massachusetts and as former Undersecretary of Farm and Foreign Agriculture Services at USDA, I especially want to commend USDA and the management and staff at the Food and Nutrition Service for recommending these important regulatory changes.

Personally, these proposed regulatory recommendations are particularly heartwarming.

Twenty six years ago I was selling fruits and vegetables at the Fields Corner Farmers Market in Boston from my brother's Lookout Farm in Natick, Massachusetts. As we were closing up around noon on a late August Saturday in 1980, the bottom of a wooden box holding Bosc pears broke apart. These excellent and tasty pears dropped into the gutter at market side.

When I returned from the front of the truck with a new, more solid, box to pick up these no longer saleable pears, I discovered a woman with two young boys in tow picking up some of these now damaged and non-saleable pears from the gutter.

She was frightened that I would fuss or even call the police. I asked her why she needed to "gutter pick" these pears. She calmed and said that her husband had left her some months prior and that her food stamps did not provide enough money for fresh fruits and vegetables for her two sons. We had a good talk, we arranged a mixed "peck" of apples and pears from an new unbroken box for her, she calmed and walked away, thanking us for this small gift of fresh picked Natick fruit.

A few years later, when I was asked to be Commissioner of Food and Agriculture in Massachusetts, I recalled this story at dinner with some nutritionists from Tufts University. They too said it was sad that poorer families, particularly those with younger

-children, didn't have money to buy top quality, fresh, healthy, local fruits and vegetables -- -- --
from nearby farmers

Subsequently, these Tufts University nutritionists met a number of times with my staff at the Department. Jointly, staff and these nutritionists devised a small pilot program for \$17,000 (\$10,000 provided by the Chiles Foundation of Portland, Oregon and \$7,000 from Commonwealth funds) to run a small pilot program to provide \$10 in farmers market vouchers for WIC mothers and their children (\$30 annually for a WIC mother and an average of 2 children to 5 years) to be tested at four farmers markets in 1986 (I attach the original memo to the Governor that jump started this program)

Backed by then Governor Dukakis and then City Councilor and now Mayor Tom Menino, local farmers and Mary Kassler, head of the State WIC program, this initial small pilot proved successful and the program expanded with state funding. Additional states also explored pilot programs (Dan Cooper in Iowa, Bob Lewis in New York and Mark Winne in Connecticut) in the subsequent five years, all using local foundation and state budgets for funding.

In 1992, Congressman Chet Atkins (Massachusetts) introduced successful legislation in Washington to provide modest funding for a national expansion. Now called the WIC Farmers Market Nutrition Program, this effort is assisting some 2.7 million WIC mothers and children and benefiting some 21,000 small farmers providing healthy, locally grown and very fresh fruits and vegetables to 30% of the WIC population in America at 2,200 farmers markets nationally. While a modest program (WIC clients only receive \$20 to \$30 in vouchers annually), the program has been a success.

Thus, USDA's proposed regulation to widen and deepen this initial program to build out from this 20 year initial WIC program and provide monthly vouchers to purchase fruits and vegetables at farmers markets as well as stores on a year round basis is personally most gratifying.

Because America's farmers markets have been particularly successful in making fresh produce available in lower income urban and rural areas, and especially to WIC participants under the existing modest pilot program, I want to focus my brief comments on the proposed revisions that address the inclusion of farmers at farmers' markets as eligible vendors.

According to your colleagues at AMS/ USDA, there are now 3,740 U.S. farmers' markets (a number that is continuously growing) serving millions of consumers and providing tens of thousands of farmers with strong market outlets for locally produced food. They operate in every state, nearly every major city, and can be found in almost every county.

Among other places, the acceptance of farmers' markets by WIC participants is evident in a Los Angeles pilot research study (**E. Jenks, et.al., University of California, Los Angeles**) that found that WIC participants redeemed 90.7 percent of their special fruit

and vegetable coupons at a farmers' market compared to 87.5 percent at a supermarket even though the location of the supermarket was more convenient

To be successful in under served, often lower income neighborhoods, farmers selling at America's farmers' markets have had to learn the specific fresh food preferences of their residents. This has frequently meant that farmers have tailored their crop selection and marketing to the traditional food preferences of a wide variety of racial and ethnic minority groups, and in many cases, newly arrived refugee and immigrants groups

At the same Fields Corner Farmers Market in Boston where the broken box of Bosc pears helped to foster the WIC Farmers Market Nutrition Program, Kachederian Berberian and his family continue to market their top quality fruits and vegetables. Now 82 years, he and his family have continually marketed at Fields Corner since the day he was the first farmer to set up there in 1979. As this neighborhood has evolved, so has his product composition, from potatoes and cabbage for an older clientele to water spinach and Asian squashes for the new Vietnamese centered neighborhood. I include a picture of Mr Berberian with his specialty Asian squashes, often sold to young Vietnamese mothers in exchange for WIC Farmers Market vouchers



**Kachederian Berberian—Berberian Farm, Northboro Mass.
Fields Corner Farmers Market-(Boston, Mass) October 14, 2006**

While Mr Berberian has adjusted his plantings to accommodate a changing customer base, many new immigrant farmers who are from the same communities as WIC

shoppers—The result is that new farmers are growing and marketing food at farmers' markets that is preferred by these same minority, refugee, and immigrants groups

Thus over these nearly 30 years that Mr. Berberian has marketed in Boston, farmers' markets have improved the access of some of America's most nutritionally vulnerable people to fresh, affordable locally produced fruits and vegetables

Surveys conducted over the years by state and tribal agencies, which administer the WIC FMNP consistently find that the modest benefits provided to WIC recipients (usually about \$20 per recipient annually) result in greater consumption of fresh fruits and vegetables. When WIC offices and other participating organizations, including the farmers and farmers' markets themselves, provide nutrition education information and activities to WIC recipients, the value of the FMNP vouchers is enhanced and the long-term consumption of fresh fruits and vegetables is more likely to occur.

By operating WIC FMNPs, many states and tribal organizations have developed a substantial share of the organizational and administrative capacity they will need to operate the expanded WIC produce voucher program proposed under the new draft Regulations.

The current procedures for WIC FMNP benefit distribution, redemption, and accountability are consistent with the proposed revisions pertaining to fruit and vegetable vouchers. FMNP agencies (generally state health and agriculture departments) now issue vouchers that range in value from \$2 to \$5.

They have voucher tracking and other accountability procedures as well as procedures to authorize participating farmers and farmers' markets. Additionally, both the development of farmers' markets and the implementation of the WIC FMNP require working partnerships and collaborations between multiple agencies and organizations, both public as well as private.

These experiences and practices, developed over the course of 17 years of operating the existing WIC Farmers Market Nutrition Program, should enable state and tribal WIC agencies to make a relatively smooth transition to the implementation of the proposed new WIC expanded fruit and vegetable cash voucher system.

In order for WIC recipients to secure as much nutritional value from the use of the proposed fruit and vegetable WIC vouchers at farmers' markets as possible, I would like to offer a few suggestions as you and your team review and finalize these innovative new regulations for the WIC program.

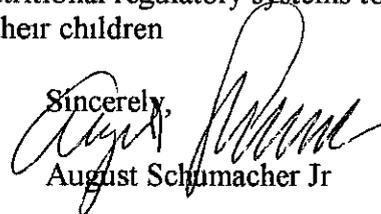
- Consistent with the Institute of Medicine's recommendation, I strongly support their suggested amount of \$10 per month of fruits and vegetables for mothers and \$8 for children, an increase from the amount proposed in your current draft regulations of \$8 monthly for mothers and \$6 monthly for children between 2 and 5 years.

-
- I ask that in implementing the new expanding WIC program, that USDA continues to fund and underpin the existing modest WIC Farmers Market Nutrition Program, maintaining existing funding levels and keeping the current rules, systems, or procedures at the federal or state levels that support the current operation and effectiveness of the WIC FMNP
 - With respect to vendor specification procedures, I would ask USDA to permit farmers' markets to participate as seasonal vendors as most farmers' markets in the country are unable to operate year round. Similarly, farmers' market should be exempt from the "WIC-only" cost containment requirement and shall not be required to carry a full-range of WIC food package products
 - I would also ask that substantial efforts should be made to promote coordination between the proposed WIC fruit and vegetable cash voucher program and the existing WIC Farmers Market Nutrition Program
 - Farmers and farmers' markets that are currently authorized under state WIC FMNP procedures should be automatically eligible for vendor specification under the new fruit and vegetable voucher program. These WIC FMNP farmer and farmers' market authorization procedures should also be applied by states in the future vendor specification process
 - When practicable, states should seek to develop systems for the distribution and use of the new WIC fruit and vegetable cash vouchers that are compatible with existing WIC FMNP procedures. Nutrition education efforts and state and local promotion of fresh fruit and vegetable vouchers should be compatible with and seek to take advantage of existing WIC FMNP education and promotion practices. States shall be required to allow farmers' markets as eligible vendors, provided that they comply with farmer and farmers' market authorization procedures \\\
 - Keeping in mind that farmers' markets carry a wide selection of locally produced fresh fruit and vegetables, I would ask that the regulations when finalized permit agencies to permit a full range of locally grown, healthy, fresh fruit and vegetable items that may be purchased with the new fruit and vegetable WIC vouchers
 - I would ask that preference shall be given to fresh fruits and vegetables first, then to frozen, and lastly canned fruit and vegetable products
 - I would ask that a cost of living adjustment reflected in the value of the new WIOC fruit and vegetable vouchers in order to keep pace with inflation
 - If possible, I would suggest that the denomination of fruit and vegetable instruments be \$2.00 and no change shall be given for vouchers that don't purchase their full denominational value

-
- To ensure smooth implementation of the new regulations, I would suggest that State advisory groups be established to develop the most effective and responsive system possible. Where states and/or municipalities have food policy councils, their participation in the advisory process is strongly encouraged.
 - Just as farmers' markets have been pioneers in making the best fruits and vegetables available to people and places that need them the most, I encourage WIC to make high quality, locally produced fresh fruits and vegetables available in all outlets that serve WIC recipients. In this regard the national WIC Program should consider implementing pilot projects that test various methods of increasing access to fresh produce, with a variety of small scale retail food outlets including farmers' markets and also bodegas, small stores and outlets in areas that are poorly served by such food stores.

I again thank and commend you and your team for the forward-looking proposal to make fruits and vegetables a regular part of the WIC food package. This advance in the food package will not only prove immeasurably valuable for lower income women and children, but also assist the nation's family farmers for whom farmers' markets are essential to preserving their livelihoods.

I feel that farmers' markets can make a substantial contribution to the success of this new initiative, one that promises to provide a healthy tomorrow for all Americans. As farmers such as Kachedorian Berberian at 82 years has evolved to serve America's changing food needs, I commend USDA for also evolving its nutritional regulatory systems to support critical dietary issues faced by our mothers and their children.

Sincerely,

August Schumacher Jr

New expanded menu



Editorial Cartoon-Capital Press-Washington State-September, 2006

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Aug. 11, 2006

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Opinion

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Uncle Sam puts fruits, veggies on WIC shopping list

Editorial

Even small children know that fruits and vegetables are part of a healthy diet. However, as strange as it may seem, they are not yet part of the menu for a government program specifically designed for mothers and small children at nutritional risk.

That's about to change. The U.S. Department of Agriculture wants to add fruits, vegetables and whole grain foods to an approved list of items that are eligible for the Special Supplemental Nutrition Program for Women, Infants and Children.

Currently, \$5.2 billion goes to the program, known as WIC.

This program serves more than 8 million people a month and helps feed more than half of the babies in this country.

Yet it is the smallest of the USDA's nutritional assistance programs, which amount for nearly 60 percent of the department's total budget.

The two other programs that get the larger share of departmental funding are for food stamps and school lunches.

The good news with these proposed new WIC guidelines is that they will help mothers, infants and children in preschool-age get some fi-

nanacial assistance for a better balanced diet.

This does not mean, however, that more money will go into the program. WIC will still pay about \$35 per month for the dietary assistance. Adding fruits, vegetables and whole grains to the shopping cart will mean participants spend less on the supplies that had been previously approved for the program, like juice, eggs, cheese and milk.

Of course not everyone is pleased with the proposed changes. Hunger groups, for example, were happy with the overall changes but disappointed that the changes will only pay for \$6 worth of fruits and vegetables for children and \$8 for women, which is \$2 less than the amount recommended by the Institute of Medicine.

The juice industry wasn't too pleased either. A spokesman for Welch's called the cuts too severe and said juice is a good source of vitamin C, as well as an alternative to less healthy soft drinks or other sweetened beverages.

Don't expect to hear cheers from the dairy industry either.

Actually there isn't a whole lot of reason to cheer here for anyone, because the outdated model for determining what foods qualified no longer fit the federal government's own nutritional guidelines. This isn't so much

Program messages

The USDA announced the Supplemental Nutrition Program for Women, Infants and Children this month.

Here are some of the differences between the old program and the proposed changes.

Fruits and vegetables. Added to the approved food list.

Juice. Cut from up to 9 ounces daily to 4 ounces per day for ages 1 through 5.

Milk. Cut from up to 3 cups daily to 2 cups for ages 1 through 5.

Soft drinks. Would allow soy milk and other people with milk allergies to have digestion problems.

Whole grains. Added to the list.

Meat. Can include acid broths and is allowed.

Peanut butter. Added to the list.

Hot sauce. Amount of canned beans and nuts added salmon as a substitute.

More online

A copy of the proposed rule can be found online at www.fns.usda.gov/wic.

To comment

Notice of the proposed rule was published Aug. 7 in the Federal Register and comments will be accepted for 60 days from that date. Comments can be submitted in one of the following ways:

By mail: Send comments to Patricia H. Dunbar, Director, Supplemental Food Program, Division of Food and Nutrition Services, USDA, 1400 Paul Carter Drive, Room 538, Alexandria, VA 22302.

Online: Go to www.fns.usda.gov/wic and follow the instructions for submitting comments or go to the Federal eRulemaking Portal.

For more information, visit www.usda.gov and follow the instructions for submitting comments.

E-mail: Send comments to WIC@SFPD@usda.gov. Include "Direct ID Number 1004-AD77, WIC Food Packages Rule," in the subject line of the message.

Many with the means are simply not eating as well as they could or should be getting the exercise they need to combat a growing obesity problem in this country. However, those least able to pay and at the highest nutritional risk will have more options for eating healthy and more opportunities to develop healthy habits while they are young.

Thirty-five dollars a month is not enough to cover all the nutritional dietary needs of women, infants or small children. But this program isn't designed to feed people in poverty. That's what the much larger food stamp program does. It's designed to help some at-risk people eat a little better and healthier. These new rules offer more food options for participants without increasing the burden on taxpayers or shifting funding from other USDA programs.

Working to help parents establish healthy dietary habits from a diverse staple of agriculture commodities is not only something USDA should encourage, but it is something the greater agriculture community can support as well.

People who eat healthy as children are much more likely to eat healthy as adults, improving the nation's health and the economic health of American farmers.

about adding a bold new heading as it is navigating a bureaucratic ship that over time has found itself drifting off course. That's not a reason to cheer, it's just doing what's right by at-risk kids.

It is important to remember here that Americans spent only 9.9 percent of their disposable income on

food in 2005, the latest numbers available from the USDA's Economic Research Service. And on average less than 20 cents of every dollar spent on food went to farmers.

Food of excellent quality and high nutritional value, not to mention a bountiful variety can be found in this country.

NOV - 6 2006

October-26,-2006

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

GP-671

RE: New Food Package Proposal For WIC participants

Dear Ms Daniels,

My name is Elizabeth Nossier and I am a dietetic intern from the University of Medicine and Dentistry in Newark, NJ, preparing to become a dietician I am writing to you because I have a strong interest in working with lower income populations in the future who are vulnerable for becoming nutritionally at risk My concern is that those 8 million individuals who are participants of the Special Supplemental Women, Infant, and Children's nutrition program should be provided a food package that addresses the same nutritional issues that are of concern to all Americans

I would like to express my strong support for the new proposed guidelines that would allow WIC food packages to be consistent with the 2005 Dietary Guidelines for Americans and the current infant feeding practice guidelines of the American Academy of Pediatrics I would also like to commend the agency for the decision to include fresh fruits and vegetables, reduced fat milk, and less high calorie juices into the package, and bringing the U S one step closer to resolving the obesity epidemic we face I am also glad to see that the new guidelines would be tailored to accommodate the diversity of its participants through the addition of soy products I think it is amazing how small changes such as these can have such a significant impact on the U S population I hope that you will continue to support our struggle to spread the important message of lifelong health across all U S. populations Thank you for your time and consideration

Sincerely,
Elizabeth Nossier, Dietetic Intern
17 W 32nd St
Bayonne, NJ 07002
nossieel@umdnj.edu

NOV 06 2006

November 5, 2006

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

6P-684

Docket ID Number 0584-AD77-WIC Food Packages Rule

Dear Ms Daniels

As an individual who has extensive knowledge of and experience working in the WIC Program at the state level and as a parent of two young children, I am pleased to submit these comments regarding the Proposed Rule to revise the WIC food packages. USDA is to be commended for taking the initiative to revise the WIC food packages in accordance with the recommendations of the Institute of Medicine. The information contained below addresses my support for the proposed changes, provides specific input requested by USDA and makes several suggestions for strengthening the proposed rule.

Support for the Proposed Rule

The changes in the proposed rule represent the most dramatic and exciting changes in the WIC food choices since the WIC program began. These changes will improve the overall health and nutrition status of WIC mothers and children by contributing to the reduction in obesity and other nutrition-related chronic diseases. The revisions are grounded in sound science, aligned with the *2005 Dietary Guidelines for Americans*, support the current infant feeding practice guidelines of the American Academy of Pediatrics and support the establishment of successful long-term breastfeeding. The proposed food packages provide WIC participants with a wider variety of food choices, allow state agencies greater flexibility in offering food packages that accommodate participants' cultural food preferences and address the nutritional needs of our nation's most vulnerable women, infants and children.

Response to Input Requested by USDA in the Proposed Rule

In the proposed rule, USDA specifically requested input in the following areas: assessing the training and technical assistance needs of WIC state agencies and WIC authorized vendors in implementing the proposed changes, the methodology used to round up the amount of infant formula and infant foods provided to participants and the administrative feasibility of the methodology, cost neutral options for providing fruit/vegetable vouchers at the IOM recommended level, how to provide the widest variety of choice of fruits /vegetables while minimizing the program complexity or administrative burden, the type and scope of administrative burden that may be associated with implementing

the provisions of the proposed rule, and the proposed timeline for implementation of the changes. In response to this solicitation for specific input, I have the following comments:

1. USDA needs to review and provide states with a comprehensive list of the WIC eligible food items

In order to insure the most cost effective implementation of the proposed rules, USDA must take the lead in soliciting applications from the food manufacturers and reviewing and authorizing at least the following WIC food items: WIC eligible medical foods, non-citrus juice, breakfast cereal, canned and frozen fruits, canned and frozen vegetables, whole wheat bread or other whole grains, canned fish, canned beans (including baked beans), infant fruits, infant vegetables and infant meat. One of the most burdensome tasks in implementing the proposed changes to the food packages will be to determine what foods qualify for the Program. The amount of staff time that would be needed for each of the 50 states and the ITOs to conduct a separate analysis of what foods are eligible to be authorized for the program is astronomical compared to the cost that would be entailed in having USDA coordinate this function.

2. USDA needs to review the minimum requirements and specifications for the proposed rule against the foods that are actually available on the market and to make adjustments where needed to insure that the foods are readily acceptable, widely available and commonly consumed.

In my research at the grocery stores in my area, I noted a number of issues with the proposed minimum requirements and specifications for the proposed rule. These include the following:

- I could find no calcium-fortified soy beverages in the marketplace that meet the proposed nutrient standard of 8grams of protein and 349 milligrams of potassium per 8 ounce serving. I support the National WIC Association proposal to modify this requirement so that there are meaningful choices for consumers.
- The number and varieties of canned fruits and vegetables without added sugar are few. As one example, I looked at 10 different brands of canned peas and could not find one that did not have sugar. Of the 10 different brands of canned corn that I looked at, only one brand did not have added sugar.
- There is absolutely no way to determine if most whole grain products meet the proposed definition in Table 4- Minimum Requirements and Specifications for Supplemental Foods as listed on page 44821. Also, I was able to find only one variety of whole wheat tortilla that could potentially meet the requirements in the proposed rule.
- Every brand of some of the types of canned beans listed as acceptable (i.e. kidney beans) had added sugar.

3. Rounding approach for determining the maximum quantity of infant formula is not practical

USDA needs to develop an alternative solution to the proposed rounding up methodology for infant formula that allows for consistency in the number of cans of formula provided.

~~The proposed methodology for the State rounding option will be extremely burdensome to administer and will result in a wide variation in the number of cans of formula issued to infants each month. Programming a computer system to track the amount of formula issued to individual participants and to try to adjust this amount over the number of months that the infant is eligible to receive formula would not only be difficult, but extremely costly as well. Complicating this situation is the possibility that the breastfeeding status of the infant could change over time. A more practical option is to allow States the discretion to round up formula each month according to the breastfeeding status and age of the infant.~~

4. Authorization of Farmer's Market vendors

Although on the surface it may seem logical to permit States to authorize farmer's market vendors to redeem the fruit and vegetable food instruments, there are a number of issues that must be carefully considered before this option should be allowed. As currently drafted, the proposed rule makes this option difficult to implement because it requires farmer's market vendors to adhere to the same requirements as a retail food vendor, including minimum stock and the various cost containment requirements. The only way that a farmer's market vendor could effectively operate as a WIC program vendor would be if the vendor was authorized under the existing Farmers' Market Nutrition Program vendor certification procedures. Even in the event that the proposed rule is revised to allow states to utilize the existing authorization process for farmer's market vendors, the following issues remain:

- The choices of allowed items differ between the WIC and the Farmer's Market Nutrition Program food instruments. Farmer's market food instruments allow the purchase of locally grown fruits, vegetables and herbs while the WIC vouchers would not restrict the customer to purchase only locally grown fruits and vegetables, but would restrict the purchase of herbs, potatoes and perhaps certain other fruits and vegetables.
- The Farmer's market vendors would likely be issued two vendor stamps – one for the WIC program and one for the Farmer's Market Nutrition Program. The likelihood that vouchers would get mixed up is high.
- Farmer's market vouchers are entitled to be redeemed by the vendor for the full price listed on the food instrument. It is assumed that the customer obtained the full cost listed on the food instrument. The WIC food instruments would need to have an actual price entered on them before they are signed by the participant and submitted to the bank.

5. Allow States the discretion to increase the monetary value of fruit/vegetable vouchers up to the maximum amount recommended by IOM by reducing the amount of juice provided to participants.

USDA should provide States with the authority to reduce the amount of juice that is provided to WIC participants by 46 ounces and to increase the dollar value of the fruit and vegetable vouchers by \$2 per participant. The average cost of a 46 ounce container of juice is substantially greater than \$2.

6. Minimum stock requirements for fruits and vegetables

USDA should allow States, through their retail store authorization procedures, to specify the minimum stocking requirements for fruits and vegetables. This will give States the ability to work with local grocers to provide the maximum number and variety of fruits and vegetables that are locally accessible, culturally appropriate and affordable. All vendors should be required to stock bananas because this is an authorized option for infant participants.

Suggestions for Revisions to the Proposed Rule

1. Changes to improve the cultural appropriateness of the WIC foods for the Hispanic population

As noted on page 44787 of the proposed rule, the Hispanic population now makes up the largest share of the WIC population. Yet, the proposed changes in the WIC foods fail to adequately address the nutritional preferences of this large population. I believe USDA could make two simple changes in the rule that would dramatically improve the nutritional appeal and benefit of the WIC foods for the Hispanic community.

a. There are now a wide variety of domestically produced Hispanic-style cheeses on the market that are made from 100% pasteurized milk and that conform to the FDA standard of identity as found in 21 CFR 133. These cheeses are competitively priced with the cheeses currently authorized by the WIC Program. I can therefore find no basis for excluding these cheeses from the list of authorized WIC cheeses. I would suggest the following language change in Table 4- Minimum Requirements and Specifications for Supplemental Foods as listed on page 44820 that would provide states with the flexibility to authorize these Hispanic-style cheeses:

Cheese.....Any single variety or blend of domestic cheese made from 100 percent pasteurized milk without any added ingredients. Must conform to FDA standard of identity (21 CFR 133). Examples include, but are not limited to, Monterey Jack, Colby, natural Cheddar, Swiss, Brick, Muenster, Provolone, part-skim or whole Mozzarella, or pasteurized processed American.

b. Adding vegetarian or non-fat refried beans to the list of canned beans allowed on the program at the state agency's option would be a cost neutral option that would greatly improve the cultural appropriateness and appeal of the WIC food package. I would suggest the following language change be added to Table 4- Minimum Requirements and Specifications for Supplemental Foods as listed on page 44821:

Non-fat or vegetarian refried beans may be allowed at the State agency's option.

2. Definition of whole grain

It is important that the definition of whole grain that is used in the proposed rule is consistent across all of the allowed whole grain products, is easily understandable to WIC consumers and provides WIC consumers with adequate choices of products. USDA needs to carefully consider how many products on the market actually meet the definition contained in the proposed rule and whether the products that do meet the definition contained in the proposed rule are easily discernable on the product labels.

Several commentators have suggested an alternative definition of whole grain that requires the product to provide at least 8 grams of whole grain per serving. I believe that a compelling case can be made for this alternative. This option would provide greater choices for WIC consumers than the proposed definition and would make it easier for WIC customers and vendors to identify which products meet the whole grain requirements. I would therefore recommend that the language in the breakfast cereal and whole wheat bread or other whole grains portion of Table 4- Minimum Requirements and Specifications for Supplemental Foods as listed on pages 44820 and 44821 be changed to indicate that the product

Must have a whole grain listed as the first ingredient and must provide at least 8 grams of whole grains per serving.

In my research on the whole grain issue, I did find that many manufacturers of whole grain products belong to an organization called the "Whole Grains Council" that allows its members to utilize a whole grain stamp on products that provide 8 grams of whole grains per serving. This stamp is easily identifiable on the whole grain products that I reviewed.

3. Whole wheat bread

I would point out that the actual language contained in the proposed rule would appear to limit the bread choices to whole wheat bread. This appears contrary to the desire in the preamble to make available additional whole grain bread options. USDA should review the wording of the proposed rule to insure that it is consistent with the desired intent. There are many breads made entirely with gluten free grains that would not appear to meet the definition contained in Table 4- Minimum Requirements and Specifications for Supplemental Foods of the proposed rule.

4. Fish packaged in foil bags

I have compared the prices of fish packaged in foil bags and fish packaged in can containers at several store locations and have concluded that foil packages are anywhere from two to three times the cost of the canned alternative. I would recommend that USDA not allow fish in foil bags since it is clearly not a cost neutral alternative to canned fish.

5. Allow all participants to purchase baked beans

States should be granted the option to authorize baked beans (without meat) for any WIC

participant, rather than having this limited to WIC participants with limited cooking facilities--Baked beans are a cost-neutral alternative to canned beans--

6. Expand the definition of WIC eligible medical food and allow States the flexibility to make appropriate substitutions to accommodate individual participant needs based on a documented medical condition.

The proposed criteria for whole grain breakfast cereals eliminate single-grain corn and rice cereals from the eligible list of cereals. Participants with special conditions, such as allergy to wheat or gluten-intolerance, will be limited in breakfast cereal choices. In these cases when a participant presents with a medical diagnosis that requires a "wheat-free" cereal, a special package should be prescribed that includes cereals that meet the iron and sugar criteria.

7. Categorical Tailoring and Substitution Requests

I find the removal of the State option to categorically tailor or propose food substitutions to be extremely problematic. Along with rapid changes in the demographics of the WIC population and the nation as a whole, there are continual changes in the food industry that impact the availability of specific foods and these changes demand that a process be available for making more immediate changes in the WIC foods. The changes in the WIC food packages as contained in the proposed rule took 30 years to achieve. It is essential that States be allowed the ability to revise food lists to keep pace with the needs of their participants. Likewise, it is impossible to identify in a rule all of the possible reasons why WIC foods might need to be tailored. It is the job of the WIC CPAs, not USDA, to determine when tailoring should occur.

In summary, I commend USDA for the release of the proposed rule making major changes to the WIC food packages. This proposed rule makes the WIC food packages consistent with the *2005 Dietary Guidelines for Americans* and is a major step forward to improving the overall nutritional health and well-being of WIC mothers and children.

I hope that USDA will carefully review the comments and suggestions for revisions to the food packages that I have made. I believe these changes will improve the cultural appropriateness of the WIC foods and will help insure that the WIC foods are more readily acceptable and widely available. The changes that I have suggested in this document will also help to insure a smoother implementation of the proposed changes. I urge publication of a final rule by the spring of 2007 to assure timely implementation of the rule's invaluable changes.

Sincerely,



Rick Chiat

PO Box 64882

St Paul, MN 55164

649 E 800 N
Logan, Utah 84321

October 26, 2006

GP-685

Ms. Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, Virginia 2303

Dear Ms. Daniels:

REF Docket ID Number 0584-AD77-WIC Food Package Rule As a college student studying the field of Dietetics, and the many different programs available for individuals who are not food secure, I feel compelled to write and show my support for the new proposed regulations for the WIC Program

The new regulations for the WIC Program proposed by the USDA have the potential to improve the nutrition value of the food packages provided by WIC and ultimately the overall health of its beneficiaries. Despite the fact that Farmers' Markets do not carry the full-range of products that WIC requires, the opportunities they do provide for WIC participants are important. The inclusion of Farmers' Markets on the list of approved vendors greatly increases the availability of fresh fruits and vegetables in current WIC food packages. There has also previously been a limit placed on the type of fresh fruits and vegetables that can be purchased. These new regulations will allow WIC participants to make better food choices and also allow them to get the most out of their food coupons. The proposed regulations address the issue of seasonality by allowing for the purchase of frozen fruits and vegetables. This is important in climates that don't allow year-round growing. WIC participants would still be able to include fruits and vegetables in their meals despite the fact that Farmers' Markets are no longer running.

By including Farmers' Markets as approved vendors the new fruit and vegetable coupons given to WIC beneficiaries would allow for the purchase of more fresh fruits and vegetables than could be purchased at a conventional grocery store or supermarket. It would also expose people to the operations of a Farmers' Market, some who might not venture there on their own. It is also important to mention the WIC Farmers' Market Nutrition Program and emphasize that these new regulations should not change the way that program is currently run. The WIC FMNP makes it

possible for WIC participants to learn healthy nutrition habits. ~~These new regulations would~~
make the WIC FMNP an even more important program because after learning new healthy
nutrition habits an individual would be able to put that knowledge into action. Along with the
WIC FMNP and the inclusion of Farmers' Markets into the WIC program those involved in WIC
will be empowered.

The proposed regulation to the WIC Program are needed, and in fact, overdue. These new
regulations will give WIC participants the opportunity to learn, grow, and use their food coupons
for the best purposes. As a young adult I realize the importance of these regulations and the
effect they will have on me as I work to help WIC participants in the future. These proposed
regulations will have an effect on future generations, not just those utilizing WIC currently. The
regulations have the potential to change lives, and in the end the course of many lives.

Sincerely,

A handwritten signature in cursive script that reads "A. Nicole Kendrick". The signature is written in black ink and is positioned above the typed name.

A Nicole Kendrick

November 3, 2006

NOV - 3 2006

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

GP-686

Dear Ms Patricia N Daniels,

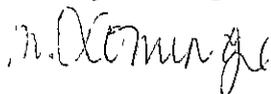
I am writing to inform you about my thoughts regarding the proposal to change the foods offered by WIC. I am currently a Nursing Student at California State University, Sacramento. This semester, I have clinical hours at the North Sacramento Public Health Nursing Field Office. Every week, I make home visits to families and many of these families utilize the WIC program. Many of these families know about the proposed changes, and they are all excited for the change. In turn, I too am excited for this change.

My clients like that they will be able to finally buy fruits and vegetables. The Asian families I visit especially like that they will be able to buy soy beverages and tofu. In addition, the Hispanic families like that they will be able to buy tortillas.

I am advocating for this change to occur. The Proposed USDA Package is more consistent with the Dietary Guidelines. This will allow the WIC participants to have a more balanced diet. In addition, the Proposed Rule allows for increased variety in the foods they can choose. Furthermore, it accommodates to the cultural diversity of the WIC participants. I feel that these changes would ultimately have a positive impact on the health of women, infants, and children in California.

Thank you for taking the time to read my letter. I look forward to the positive changes that will occur.

Sincerely,
Melody Domingo



NOV -6 2006

October-19, 2006

Chatham College
Jamie Sarkis, Box 714
Woodland Road
Pittsburgh, PA 15232

GP-687

Dear United States Department of Agriculture

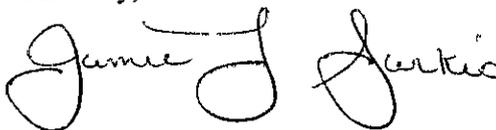
I am an undergraduate student at Chatham College in Pittsburgh Pennsylvania, and I am writing to recommend an alteration in the Women, Infants, and Children (WIC) program that is administered by your Foods and Nutritional Service. Although your program provides nutritious foods to supplement diets, nutrition education, and referrals to health care and other social services, there needs to be a revoke in the budget constraints which currently prevent infants and children from obtaining the full WIC package.

Almost half of all infants and about one-quarter of all children 1-4 years of age in the United States now participate in the WIC program, which makes it crucial for them to obtain the proper nutrition that they need. Infants and children need to have an intake of a variety of nutrient rich food to guide them in healthy brain and bodily development. The basic food categories that are provided currently include milk, cheese, eggs, fruit juice, cereal, beans/peanut butter, infant formula and tuna and carrots for breastfeeding woman. The budget constraints for this program reduced the amounts of important foods on this list such as milk, cheese, eggs, fruit juice, and infant formula. This reduction only gives children three quarters of the amount of fruits and vegetables that the Institute of Medicine determines is nutritionally sound for the WIC food package. Eight dollars should be given for fruits and vegetables alone according to the Institute of Medicine, but the WIC package only designates six dollars to this category. Along with increasing the amount of money spent for these key nutrients, more calcium rich and culturally appropriate foods, such as yogurt, should also be added to the WIC program. These are just two small but significant changes that should be made, and are an Institute of Medicine recommendation.

The Woman, Infants, and Children program that is administered by your Foods and Nutritional Service is a very useful and significant program. With some revision to the budget constraints, and the addition of calcium rich and culturally appropriate foods this program could potentially make a positive difference in the lives of many mothers and children.

Thank you for considering these suggestions.

Sincerely,



Jamie L. Sarkis

October 11, 2006

NOV 26 2006

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

6P-688

Re WIC Program – Pittsburgh, PA

Dear Ms Daniels

I am a student at Chatham College, which is located in Pittsburgh, PA, with a great concern for the WIC Program to incorporate the nutritional values of fruits and vegetables in its food program for pregnant women, nursing mothers, infants and children

The WIC Program is an essential component to the well being and care of helping mothers and children reach and maintain a healthy weight and allowing them to make healthy food choices This will help nutritionally vulnerable children form healthy eating habits from an early age Preventing obesity and teaching proper nutrition are a concern for all parents The supplemental food provided through the new additions to the package can empower mothers to choose healthy foods when they did not have such a choice previously

It is absolutely critical that pregnant women have the nutrients available in order to sustain a healthy pregnancy There are studies which show that maternal malnutrition causes slow fetal growth Women who begin pregnancy underweight and eat poorly during pregnancy run a higher risk than others of having a low-birth weight infant There were more low-birth weight infants born in the United States in 2001 than 10 years earlier, and low-birth weight remains the second most common cause of neonatal death

It is essential that a child receive the necessary nutritional food for proper development Chronic malnutrition causes a child's face, legs and abdomen to bloat or swell with water and makes the child more vulnerable to other diseases, such as measles, diarrhea and influenza If children are nutritionally deprived during early development, their essential organs claim whatever nutrients are available so other parts of their body become degraded There are studies that show if malnutrition continues long enough in infants and children that it will affect the brain from growing normally and also affect their height

We can do something about this Please provide fruits and vegetables in your food program and make it available year round for all pregnant women, nursing mothers and infants and children

Sincerely,


Molly Mitchell

Patricia N Daniels, Director
Supplemental Food Programs, FNS/USDA
3101 Park Center Drive, Room 528
Alexandria, VA 22302

GP-689

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

Dear Ms Daniels

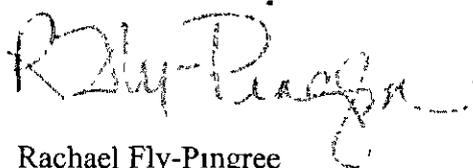
I am writing to support the USDA's proposed WIC Food Packages Rule which will improve the health and nutritional quality of the foods in the program. The USDA should increase the fruit and vegetable benefits to fully meet the Institute of Medicine recommendations. The USDA should make the value of the WIC fruit and vegetable benefit consistent with the IOM's recommendation to provide \$10 per month of fruits and vegetables for women and \$8 for children. I say this because proper nutrition in the early years is pivotal to a child's brain growth and fruits and vegetables are a mainstay of vitamin nutrition essential to proper brain maturation.

Currently I am a student at Chatham College majoring in Biology with plans to be a Physician Assistant. In my Child and Adolescent Psychology class we are discussing nutrition and its effects on brain development. WIC is an essential part of the brain development equation for so many children, but it could be greatly improved upon by expanding its current offering of fruits and vegetables.

Malnutrition is a serious condition in which a person does not receive or consume sufficient food of any kind. Malnourished infants and young children suffer consequences that are permanent and last a life time. Malnourished children suffer when their still forming brains do not develop normally. Malnourished children are also more susceptible to disease because their bodies have no stored reserves to protect them. If malnutrition hits critical proportions head-sparing can occur which is the biological protection of the brain when malnutrition essentially shuts down physical growth. Critical brain growth occurs during the first two years of a child's life, this is why nutrition is so important at this time.

In conclusion, I write in support of the USDA's proposed WIC Food Packages Rule to provide for the expansion adding fruits and vegetables throughout the year. I write because proper nutrition during the younger years of development is essential to brain growth. Improper nutrition can lead to malnutrition which can eventually lead to brain cell death. Expanding the WIC food package to include fruits and vegetables would provide women, infants and young children with essential nutrients and vitamins to assist in the development of their still growing brains. Please take careful consideration of this matter, thank you.

Sincerely,



Rachael Fly-Pingree

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Date:

Dear Friends at US Department of Agriculture,

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

What I like most about the proposed changes is the addition of whole grains, fruit and vegetables and dairy substitutes. Great changes!

What I like least about the proposed changes is

I think there also needs to be ~~be~~ a change for 100% fruit juice

Thank you for reading my comments.

Sincerely,

Andrea Nofa

Name: Andrea Nofa

Title: student intern

Organization: UCSC