

EMAIL 11-06-06 FROM Anderson, Jennifer [jela@cahs.colostate.edu]

November 6, 2006

Via Electronic Mail

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

RE: RIN 0584-AD77; Special Supplemental Nutrition Program for Women, Infants and Children (WIC): Revisions in the WIC Food Packages; Proposed Rule (71 FR 44783)

Dear Ms. Daniels:

I am most concerned about your proposed changes to the WIC package. Below is a chart showing the current and proposed changes for partially breastfed and fully formula fed infants.

	Current Partially Breastfeed (reconstituted fl oz/month)	Proposed Partially Breastfeed (reconstituted fl oz/month)	Current Fully Formula Fed (reconstituted fl oz/month)	Proposed Fully Formula Fed (reconstituted fl oz/month)
0-3 months	806	----	806	806
1-3 months	----	364	----	----
4-5 months	----	442	----	884
6-11 months	----	312	----	624
4-12 months	806	----	806	----
Total	9672	3848	9672	8736

The **partial breast feeders** have their formula decreased by 60% (9672 oz. to 3848 oz.) or 116,480 kcal over 10 months (305 days) which is an average decrease of ~382 kcal and 6.87 g protein per day (based on 1.8 g protein per 100 kcal). This decrease is significant especially knowing that breast milk after 6 months does not provide adequate zinc, iron, and calcium and that complementary foods (feeding) are typically low in iron and zinc. If a breastfeeding mother is working without lactation facilities at work, can all of the calories and protein be met with complementary feeding alone? How does WIC know what volume of partial breastfeeding a mother does? What happens to the intake of the infant when the breastfeeding mother stops breastfeeding or starts partially breastfeeding her infant in the first 3 months of life? There is no supplemental formula in the newly proposed ruling.

For 1 to 3 months: 364 oz. X 3 months ÷ 91 days = 12 oz. per day; for 4-5 months: 442 oz. X 2 months ÷ 61 days = 14.25 oz. per day; for 6-11 months: 312 oz. X 6 months ÷ 183 days =

10.22 oz. per day. For **exclusive formula feeding babies**, there is a decrease in formula 936 oz. over 335 days which is an average of 57 kcal and 1.0 g protein per day. For 4-5 months: 884 oz. X 2 months ÷ 61 days = 29 oz. per day but for 6-11 months: 624 oz. X 6 months ÷ 183 days = 20.5 oz. per day

Will this change not run the risk that mothers will feed cow's milk if they do not have enough formula? I hope that you will seriously consider the impact that these proposed changes would have on our at-risk infants and mothers nutritional status. I would recommend that any proposed changes should be accompanied by data collected ahead of any proposed changes to ensure that negative nutritional insults will not ensue.

Eggs, specifically DHA-rich eggs, should be increased in both the mothers' and infants' food package. I and colleagues at Colorado State University have recently conducted research in this area to find that the addition of 300mg of DHA per day during the last trimester results in increased gestational health and can prevent low-birth weight in high risk WIC clients. An additional 4.2 days of growth was attained in these pregnant women. A manuscript with these significant results is in process of being submitted. However, as the data we have obtained shows direct benefit for the pregnant women during their last trimester of pregnancy, it warrants consideration for the WIC package. Furthermore, the benefits of DHA to the new born has shown significant improvement to cognitive development. Please consider carefully the addition of DHA enriched eggs at these critical periods of development of the fetus and in the new born infant.

In closing let me reiterate my concern around evaluation. The evaluation data should also be obtained for the entire proposed food package to be assured it is resulting in improved health for the WIC participant. Evaluation is vital to know if the changes are resulting in the benefits expected.

Sincerely,



Jennifer Anderson, Ph.D., R.D.
Professor and Extension Specialist
Department of Food Science and Human Nutrition
Colorado State University
Fort Collins, CO 80523-1571

HP-377

From: Cindy Turner-Maffei [cturner@babyfriendlyusa.org]

Sent: Monday, November 06, 2006 7:33 PM

To: WICHQ-SFPD

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

We write to congratulate the USDA and IOM on the extensive process that has gone into revising the WIC food packages. We are in full support of the proposed new WIC Food Packages Rule.

Below are our comments on specific proposed changes:

- a.. The addition of fresh fruits, vegetables and emphasis on whole grains are excellent changes.
- b.. The reduction of foods that can be overconsumed, crowding out other nutrient dense foods, such as juice, eggs, cheese and milk, is very timely and important.
- c.. It is unfortunate that the cost of yogurt would raise food package costs, as this form of dairy may be easier for lactose-intolerant women to consume.
- d.. The addition of baby food for breastfed infants is an appropriate addition to meet the needs of this population, while providing a tangible reward for families that continue to breastfeed beyond the first six months.
- e.. The restriction of formula for breastfed newborn infants seems well intended. We reinforce the concept that limited trials of this aspect of the proposal should be conducted to provide information about whether this restriction would actually increase or decrease the amount of exclusive breastfeeding during the first month of life.

We commend the USDA and the IOM for these landmark changes to benefit our most vulnerable citizens.

Cindy Turner-Maffei, MA, IBCLC
Karin Cadwell, PhD, IBCLC
Faculty, Healthy Children Project
Adjunct Faculty, The Union Institute & University
327 Quaker Meeting House Road
East Sandwich, MA 02537 USA
tel (508) 888-8044 * fax (508) 888-8050
<http://www.healthychildren.cc>

HP-380

From: DeJager, Jill [JDejager@ashe.ucla.edu]
Sent: Tuesday, October 17, 2006 4:15 PM
To: WICHQ-SFPD
Subject: WIC

This is wonderful. Glad to see more fruits and vegetables will be available in the place of juice.

Jill DeJager, MPH, RD

From: WebMaster@fns.usda.gov
Sent: Tuesday, October 17, 2006 1:41 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Sarah Rose
EMAIL: saraharose@yahoo.com
CITY: Hanford
STATE: California
ORGANIZATION: US Navy, American Academy of Husband-Coached Childbirth
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 17, 2006
Time: 01:41:24 PM

COMMENTS:

YES YES YES to the proposed changes in WIC. I am a US Navy Spouse (husband is a Navy pilot), have 3 breastfed children, and am a certified childbirth educator, having taught in & around Norfolk & Virginia Beach, VA. I have seen first-hand the effects of both breastfeeding families & those who choose to use formula right off the bat. I have dealt with the families who use WIC to pay for thier infants' formula, and I have dealt with those who take advantage of the breastfeeding support resources that are out there. One thing I have learned over the years of working with these families is this: **AFFORDABLE HEALTHCARE BEGINS WITH BREASTFEEDING.** The breastfeeding families whom I have served spend less time in the pediatrians' offices and have fewer emergency room visits than do their formula-using counterparts. This has been statistically proven. Sadly, many of the WIC mothers do not feel that they have been given adequate breastfeeding support by the WIC team. It is easier, especially in those first couple of months post-partum, to just reach for that free formula that they have been given. Although breastfeeding is a more natural choice for feeding a baby, it is often times difficult, especially in the beginning. Engorgement, mastitis (breast infection), and sore nipples are just the tip of the iceberg. And then you toss in the fact that there are so little incentives to those mothers who want to breastfeed who are also dependent on WIC. In my opinion, it would be very beneficial for the WIC offices to staff Board-Certified Lactation Consultants as a part of the program. Women who have babies and who are on the WIC program should be encouraged not only to begin breastfeeding, but to follow through with **EXCLUSIVE** breastfeeding during the first 6 mos of their babies' lives. (per the AAP [American Academy of Pediatrics] statement on infant nutrition. www.aap.org).

Thank you for your time. I do hope serious consideration will be given to my suggestions & to the multitudes of other tax-payers who feel the same. These changes look like a step in the right direction-- the direction of saving us all millions of dollars in taxes AND in healthcare costs, annually.

Regards,
Sarah Rose

HP-382

From: WebMaster@fns.usda.gov
Sent: Wednesday, October 18, 2006 10:24 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Kate Cropp WHNP, IBCLC, MSN
EMAIL: katecroppibclc@hotmail.com
CITY: Nashville
STATE: Tennessee
ORGANIZATION: Tennessee Lactation Coalition, Vanderbilt University Medical
Center and Children's Hospital
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 18, 2006
Time: 10:23:37 AM

COMMENTS:

I commend the efforts being made to improve the nutritional quality through the WIC program. The proposed reductions in dairy and cheese, reduction in infant formula, introduction of alternatives such as soy and tofu, introduction of a "partially breastfed" category, and continued support for breastfeeding moms beyond 6 months are great! I do think that eggs can be a great source of nutrition for lactating and young children, and do not think it is wise to reduce this food source. Although WIC provides breastfeeding support via education and peer counseling, WIC is doing a disservice for breastfeeding moms by not having IBCLCs in the office to help moms work through more complex breastfeeding/lactating problems. By having IBCLCs in office, professional, clinical breastfeeding and lactation care can be given which would extend "full breastfeeding", reduce formula intake, provide for natural child-spacing, and an overall reduced cost of services. Also, more support is needed for lactating moms who return to work. These women need education, support, and empowerment to pump at work and they need the assistance of hand expression, quality manual pumps, and possibly double electric pumps as well. If WIC truly supports breastfeeding more than it does now, WIC costs would be reduced and overall mother and infant health would be better.

HP-383

From: WebMaster@fns.usda.gov
Sent: Wednesday, October 18, 2006 7:05 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Dr. Phyllis Lewis
EMAIL: harriph@holycrosshealth.org
CITY: Silver Spring
STATE: MD
ORGANIZATION: Children's National Medical Center
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 18, 2006
Time: 07:04:41 PM

COMMENTS:

This is a long needed change and promotes healthy eating! Kudos!
The next challenge is getting some of the same changes for school meals.

HP-384

From: WebMaster@fns.usda.gov
Sent: Thursday, October 19, 2006 7:27 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Sara Stone
EMAIL: sstone@co.shasta.ca.us
CITY: Redding
STATE: CA
ORGANIZATION: Breastfeeding Support Center/ Shasta County Public Health
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 19, 2006
Time: 07:27:16 PM

COMMENTS:

I love the changes! Keep up the good work.

HP-385

From: Beach, Patricia S. [psbeach@UTMB.EDU]
Sent: Friday, October 20, 2006 9:14 AM
To: WICHQ-SFPD
Subject: Proposed WIC food packages

Congratulations on the creation of much improved food packages for WIC. I am particularly pleased with the marked decrease in juices supported by the WIC program, since juice overuse is probably the leading cause of overweight in toddlers.

Please do not allow pressures from special interest groups to sway you from the nutritionally sound guidelines!

Patricia S. Beach MD
Professor of Pediatrics
Director, Division of General Pediatrics

University of Texas Medical Branch
(409) 772-2357
Fax 409 747-0784
psbeach@utmb.edu

HP-386

BlankFrom: Victor Perez [vhperez@ucla.edu]
Sent: Friday, October 20, 2006 9:50 AM
To: WICHQ-SFPD
Subject: WIC food package changes

I applaud the intent to change the package to reflect our current knowledge about nutrition. I am a clinical provider to low income communities and this change much needed. Specifically, I hope that we are getting rid of the sugary juice. Teeth are rotting and children are growing in the wrong direction!

Thank you.

Victor H. Pérez, MD, MPH
Assistant Clinical Professor of Pediatrics

The Venice Family Clinic
And
UCLA Center for Healthier Children, Families and Communities
1100 Glendon Ave Suite 850
Los Angeles, California 90024-6939
310.794.2583 ph
310.794.2728 fax
vhperez@ucla.edu

HP-391

From: Kathleen Fallon Pasakarnis [NurturingFamily@aol.com]
Sent: Friday, October 13, 2006 9:01 AM
To: WICHQ-SFPD
Subject: =?ANSI_X3.4-1968?Q?=3FDocket_ID_Number_0584-AD7?=
=?ANSI_X3.4-1968?Q?7,_WIC_Food_Packages_Rule,=3F?=?

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 have volunteered my services as a lactation consultant, bringing breastfeeding information to pregnant and breastfeeding mothers in the WIC program for many years. I am delighted with the work that USDA/FNS has done to bring the WIC food packages into alignment with the 2005 US Dietary Guidelines and other national nutrition guidance, including those of the American Academy of Pediatrics.

As cow's milk sensitivity is a common problem, I am delighted that the proposed changes include soy milk, tofu and canned beans, among others, to provide a greater variety of high nutrient food options for these mothers.

Currently, WIC serves 8.2 million women, infants and children. Approximately half of all infants and 25% of all children under 5 in the U.S participate in WIC. The revised food packages will help our nation's families to establish healthy eating habits – a key to preventing obesity, diabetes and heart disease.

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

Kathleen Fallon Pasakarnis
98 Woodland Drive
South Windsor, CT 06074

HP-393

From: Melissa Aguirre [MAguirre@fresno.ucsf.edu]
Sent: Thursday, October 19, 2006 9:26 AM
To: WICHQ-WEB
Subject: WIC Food Package changes

I fully support the changes you are making to the food packages. I hope this also includes the elimination of juice for more fruits and vegetables.

Sincerely,

Melissa Aguirre, MD

HP-394

From: Amanda.Howell@kp.org
Sent: Friday, October 20, 2006 5:55 PM
To: WICHQ-SFPD
Cc: Scott.Gee@kp.org; Amy.M.Andersen@kp.org
Subject: Docket ID Number: 0584-AD77-WIC Food Packages Rule

I am writing on behalf of Kaiser Permanente, Northern California's largest not for profit Healthcare delivery system, to express our strong support for the proposed changes to the WIC food packages rule.

We are pleased that the proposed changes more closely reflect the new USDA guidelines and the Institute of Medicine's current recommendations. The new emphasis on fresh fruits and vegetables and the changes around juice are long overdue; these changes, along with the increased allowances for whole grain foods and dairy alternatives will greatly enhance the options available to women who rely on WIC to feed their families.

As you know, women, infants, and children who require food assistance are already at increased risk for developing obesity, even as they face food insecurity. Providing a broad range of healthy food choices is a major step in obesity prevention, and will benefit the health and well being of millions of women and their children.

Kaiser Permanente commends WIC for proposing the rule changes and urges you to approve the revised package as written. We are pleased to have WIC as a partner in improving the health of our communities.

Sincerely,

Scott Gee, MD
Associate Director of Preventive Health
Kaiser Permanente, Northern California

Amanda Howell
Project Manager, Pediatrics
Regional Health Education
1950 Franklin St., 13th floor
Oakland, CA 94612
(510) 987-4669
Tieline: 8-427-4669

Health Education inside KP: kpnet.kp.org/healthed
Health Education on the World Wide Web: kp.org/healthyliving

HP-395

From: WebMaster@fns.usda.gov
Sent: Friday, October 20, 2006 5:54 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Debra Lotstein, MD, MPH
EMAIL: dlotstein@hotmail.com
CITY: Santa Monica
STATE: CA
ORGANIZATION: UCLA Medical Center
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 20, 2006
Time: 05:54:08 PM

COMMENTS:

I am writing to express my support for the proposed rule to change the Special Supplemental Nutrition Program for Women, Infants and Children food packages. The health and well-being of the nation's women, infants, and children is a priority of our organization. The proposed changes will greatly benefit vulnerable mothers and children.

I agree that the changes in the proposed rule are a significant step forward and will improve the overall health of WIC mothers and children by contributing to reductions in obesity and other diet-related chronic diseases. In particular:

- I support adding fruits and vegetables to the food packages of women, infants and children while reducing the amount of fruit juice provided.
- I support the quantities of dairy products and eggs offered in the proposed rule. These quantities meet the 2005 Dietary Guidelines for Americans. We agree that alternative calcium sources such as soy beverage (soy milk) and tofu are necessary additions to the food packages to address milk protein allergy, lactose maldigestion, personal preferences, and cultural diversity of the WIC population.
- I support the whole grain requirement for cereals and the introduction of whole grain bread and other whole grains such as corn tortillas and brown rice.
- While I commend USDA's efforts in the proposed rule to support the initiation and duration of breastfeeding, I urge that there be no test period for the partially breastfeeding food packages for women and infants.
-

• To further support breastfeeding, we urge that the cash-value vouchers for fruits and vegetables for fully breastfeeding women be increased to \$10. We believe that this change would be cost-neutral and a significant incentive for breastfeeding mothers.

I urge publication of a final rule by the spring of 2007 to assure timely implementation of the rule's invaluable changes.

Sincerely,
Debra Lotstein, MD, MPH

HP-396

From: WebMaster@fns.usda.gov
Sent: Friday, October 20, 2006 8:40 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Elizabeth Murane
EMAIL: eamurane@sbcglobal.net
CITY: Redding
STATE: CA
ORGANIZATION: County Public Health
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 20, 2006
Time: 08:39:45 PM

COMMENTS:

It is encouraging to read the proposed changes to the WIC food package incorporating more fruits, vegetables, whole grains with resulting increase in fiber and decrease in fat. Such a package will help families to experience the full flavors of unprocessed foods and have improved health. Children who get to taste such foods will have healthier eating habits.

HP-397

From: Amanda McGahee [amcgahee@mail.mcg.edu]
Sent: Friday, October 20, 2006 11:28 PM
To: WICHQ-SFPD
Subject: ?Docket ID Number 0584-AD77, WIC Food Packages Rule,?

HP-397

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 American Academy of Pediatrics guidelines.

As a pediatrician and I member of the American Academy of Pediatrics, I firmly believe that the proposed changes will be of great nutritional benefit to my patient population.

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

Thank you.

Amanda McGahee
1006 Ossabaw Court
Augusta, GA 30906

HP-398

From: WebMaster@fns.usda.gov
Sent: Sunday, October 22, 2006 5:46 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Jaime Wu
EMAIL: jkw380@hotmail.com
CITY: Alhambra
STATE: CA
ORGANIZATION:
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 22, 2006
Time: 05:46:23 PM

COMMENTS:

October 22, 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

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. As a Registered Dietitian as well as a Public Health student, I am pleased to support these long-awaited reforms. I commend the USDA for adopting the recommendations of Institute of Medicine's (IOM) Report: "WIC Food Packages: Time for a Change." I believe that, when implemented, they will greatly strengthen the WIC program's ability to improve the nutrition and health status of millions of families.

With the increasing concerns on childhood obesity as well as chronic disease, I believe that the changes to the WIC packages will serve as obesity prevention. By providing cash-value vouchers for fruits and vegetables, WIC families can incorporate more fruits and vegetables into their diet as recommended by the 2005 Dietary Guidelines.

Additional changes such as reducing milk, cheese, eggs, and juice, the foods provided by WIC are better aligned with the Dietary Guidelines and recommendations from the American Academy of Pediatrics. For example, reducing the dairy products to low-fat options is a great way to reduce saturated fat intake while still offering calcium-rich foods. Also, adding alternative calcium-rich products such as soy creates more variety for the WIC client.

Finally, the proposal will provide stronger incentives for continued breastfeeding by providing less formula to partially breastfed infants and providing additional quantities/types of food for breastfeeding mothers.

All of the proposed changes reinforce WIC nutrition education. Simply by supplying healthy foods, WIC will be able to establish healthy dietary patterns early in life.

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

Thank again for providing us with the opportunity to comment on the proposed revision of the WIC packages. Adopting these revisions, which are scientifically based, allows WIC participants to follow healthier dietary lifestyles, establish healthy dietary patterns, and reinforce nutrition education. Ultimately, this will improve community food security, address the obesity epidemic, and help low-income families make healthier food choices.

Sincerely,

Jaime Wu, RD

HP-399

From: Keller-Meyers [kelmey@cox.net]
Sent: Monday, October 23, 2006 4:57 PM
To: WICHQ-SFPD
Subject: Changes in WIC

I am a pediatrician and co-chair of the Obesity Committee of the Massachusetts Chapter of the American Academy of Pediatrics. I agree with the proposed changes. My only suggestion would be to eliminate juice altogether from all the packages.

Julie Meyers, M.D.

HP-403

From: Melissa Bartick [melissabartick@earthlink.net]
Sent: Monday, October 23, 2006 10:34 PM
To: WICHQ-SFPD
Subject: DocketID number 0584-AD77 WIC Food Packages Rule

Dear WIC,

As a physician, I support the new WIC Food Packages rule. It is time for WIC to show its support for exclusively breastfeeding infants, and the food package overhaul does just that. Presently, WIC food packages have the undesired effect of making it easier for mothers to formula feed than breastfeed. We need to do what we can to make sure our tax dollars support the healthier choice.

Thank you,
Sincerely,
Melissa Bartick, MD, MS
Chair, Massachusetts Breastfeeding Coalition

HP-405

From: Julie Friesen [julie.friesen@sbcglobal.net]

Sent: Tuesday, October 24, 2006 12:25 AM

To: WICHQ-SFPD

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

I am a pediatric nurse practitioner. In my daily practice I routinely see children receiving WIC. I also a large number of school age children that are obese. Fruit and vegetables are usually minimal in their diet and they have developed a preference for high fat and starchy foods. Inculding fruits and vegetables in the diet of the under 5 group is great!! I wholeheartedly support this move.

It will make my work easier to know that WIC is encouraging the same nutritious diet that I am.--Julie Friesen Pediatric NP

email 11-06-06 from Jacqueline Beard [jkbear24@msn.com]

November 6, 2006

Patricia N. Daniels, Director
Supplemental Food Programs Division, FNS/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 express support For the proposed rule to change the Special Supplemental Nutrition Program for Women, Infants and Children food packages. I strongly support the intent of the changes in the proposed rule, which is a significant step forward to improve the overall health of WIC mothers and children, contributing to reductions in obesity and other diet-related chronic diseases.

The key points of my comments are summarized below, listed by content area.

Food packages and foods

- I support the changes proposed in food package II. However, I recommend the amount of infant cereal be reduced.
- I support the addition of commercial infant food fruits and vegetables, and fresh bananas in food package II.
- I support the proposal not to allow low-iron formula through the WIC program.
- I support the clarification that state agencies would not require verification of vitamin C content for 100 percent citrus juices.
- I support all other changes in food package IV through VII, except as noted in the 8 items below.
- I recommend single-grain corn and rice cereals be included, and that certain adult cereals be added for finger foods for developmentally-ready infants.
- I urge FNS to allow states to expand the list to of fruits and vegetables in food package II to include fresh, frozen or other canned fruits and vegetables.
- I urge FNS to reconsider the addition of yogurt in quarts as a milk alternative.
- I urge FNS to establish an alternative minimum nutrient standard for soy beverages.
- I urge FNS to use this opportunity to recognize breastfeeding as a cost containment measure and to allow for conversion of food fund savings to Nutrition Services and Administration when supported by high breastfeeding rates.
- I urge FNS to revise regulations regarding client sanctions to include wording in support of group-based food delivery systems.

- I urge FNS to clarify ages for different infant food packages.
 - I oppose requiring medical prescriptions for non-dairy sources of calcium and additional cheese in food packages IV through VII.
-

Fruits and vegetables

- I enthusiastically support adding fruits and vegetables to the WIC food package.
- I recommend FNS allow clients to pay the difference when their purchase exceeds the coupon cash value, as one option to simplify redemption.
- I recommend inclusion of white potatoes, which are similar to bananas, parsnips and turnips in nutrient content. Excluding them adds complexity of administering this benefit and will cause confusion at the check-out stand.
- I urge FNS to allow state agencies to determine the dollar denomination on the cash-value food instruments.
- I urge FNS to allow states to utilize existing Farmers' Market Nutrition Program vendor selection and coupon redemption procedures.

Infant formula food packages

- I support the three infant feeding options for ages 2-5 months, but recommend FNS allow the Certified Professional Authority to tailor the infant formula food package during the first month of life.
- I recommend the amount of infant formula and infant foods be rounded up or down and given at the same level each month, to simply processing significantly.
- I urge implementation of the three food packages concurrently, and oppose piloting the partially breastfeeding food package changes.
- I strongly oppose the proposed rule that the mother must choose either a full formula food package or a breastfeeding food package and no formula. I am concerned this rule will have adverse effects on the WIC client's interest in and ability to breastfeed.

Medical documentation

- I am concerned the proposed requirement of WIC staff to receive medical documentation prior to providing food packages containing soy-based beverages, tofu, and additional cheese will create barriers to those clients for whom the consumption of these foods may be a cultural/personal preference. I oppose the requirement because the preference is often not a medical issue, the requirement is costly in terms of time and use of the health care system, and it undermines WIC's efforts to provide culturally appropriate foods. Number of populations obtain these foods due to cultural preferences, and not medical need.

Medical formulas / foods

- I recommend limiting medical foods supplied by WIC to pediatric formulas which are nutrient dense beyond one year of age. Because the administration of medical foods is a very complex solution for a very small percentage of WIC clients (less than 2% of all clients), I would urge you to reconsider the inclusion of all medical foods.

-
- ~~If FNS does include medical foods, I urge the maximum monthly amount be~~ determined by a nutritional assessment by a qualified dietitian with approval of the client's medical provider.

Timeline for implementing juice elimination

- I recommend the juice elimination be included in the same timeline as the other proposed changes. Implementing one change ahead of a large number of others is inefficient and unnecessarily complicates training of staff and clients.

The Washington State WIC Program urges publication of a final rule by spring of 2007 to assure a timely start in implementing the rule's invaluable changes. I also urge that a longer implementation period be reconsidered to account for necessary changes in automation systems, development of new policies and procedures, and training of staff and retailers. In addition, because these changes are so important to the health of women, infants and children, I request FNS move forward regardless of cost neutrality, and consider supporting implementation by developing a glossary of key words and phrases in multiple languages that can be used by all states.

Thank you for the opportunity to comment on the proposed rule. The long-term benefits of providing participants with fruits and vegetables, lower fat dairy products and whole grains, as well as additional incentives for fully breastfeeding women will greatly aid WIC in improving the life-long health of our most vulnerable women, infants and children.

Sincerely,

Jacqueline Beard. RD

Jacqueline Beard, RD
Nutritionist

From: Kelley Dodgson [klogr8@yahoo.com]
Sent: Tuesday, October 24, 2006 1:11 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

To Whom It May Concern,

As a registered dietitian, I feel it is important to address the proposed changes to the WIC food package.

The proposed rule limits the options for milk substitution within the dairy group, which is not consistent with the 2005 Dietary Guidelines for Americans recommendations for dairy foods, and may make it difficult for women and children to meet their nutrient needs.

A 2005 Dietary Guidelines Advisory Committee Report stated the milk group is a major contributor of dietary calcium, and a substantial contributor of vitamin A, potassium and magnesium. The Dietary Guidelines state that milk alternatives within the milk food group, such as yogurt and lactose-free milk, are the easiest and most reliable way for those sensitive to lactose to derive the health benefits associated with milk and milk products.

In contrast, the proposed rule does not allow yogurt as a milk substitution, although a 2004 Institute of Medicine report, "WIC Food Packages: Time for a Change," recommends allowing yogurt.

The proposed rule also decreases the amount of cheese allowed for substitution of milk. At the same time, the proposed rule allows women and some children to substitute tofu or fortified soy-based beverages for milk; however, only soy beverages fortified to resemble the nutrient package in milk would be allowed.

For children, USDA acknowledges that dairy is a superior nutrient source for bone health, and does not allow most children to substitute soy-based beverages for milk. A comparison of the nutrients in tofu and milk would suggest that tofu cannot adequately replace all the dairy nutrients. Yogurt and cheese are often well-accepted by those sensitive to lactose, and also appeal to varied cultural food preferences.

Both the Dietary Guidelines and the WIC program recognize the importance of dairy foods in healthy diets, which supply a unique package of nutrients, including calcium, potassium and magnesium which are lacking in the diets of many Americans including WIC participants. While the WIC food packages in the proposed rule provide the age-appropriate number of servings recommended by the 2005 Dietary Guidelines for most groups, that amount is a reduction in dairy from the current WIC packages, which provide up to four servings per day.

The 2005 Dietary Guidelines and MyPyramid set up a foundation for a healthy diet by recommending Americans choose three servings of low-fat or fat-free milk and milk products each day. The 2005 Dietary Guidelines recognize that people who consume more dairy foods have better overall diets, consume more nutrients and have improved bone health.

I sincerely hope you will take this information under advisement and reconsider the proposed changes to the WIC package.

Thank you for your time and consideration.

Sincerely,

Kelley Dodgson, RD, LD
Atlanta, GA

From: WebMaster@fns.usda.gov
Sent: Tuesday, October 24, 2006 2:20 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Linda Greco,RD,LDN
EMAIL: lindagreco@hotmail.com
CITY: Kenner
STATE: LA
ORGANIZATION:
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 24, 2006
Time: 02:20:25 PM

COMMENTS:

Dear Sirs,

As a registered dietitian, I feel it is important to address the proposed changes to the WIC food package.

The proposed rule limits the options for milk substitution within the dairy group, which is not consistent with the 2005 Dietary Guidelines for Americans recommendations for dairy foods, and may make it difficult for women and children to meet their nutrient needs.

A 2005 Dietary Guidelines Advisory Committee Report stated the milk group is a major contributor of dietary calcium, and a substantial contributor of vitamin A, potassium and magnesium. The Dietary Guidelines state that milk alternatives within the milk food group, such as yogurt and lactose-free milk, are the easiest and most reliable way for those sensitive to lactose to derive the health benefits associated with milk and milk products.

In contrast, the proposed rule does not allow yogurt as a milk substitution, although a 2004 Institute of Medicine report, "WIC Food Packages: Time for a Change," recommends allowing yogurt.

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Both the Dietary Guidelines and the WIC program recognize the importance of dairy foods in healthy diets, which supply a unique package of nutrients, including calcium, potassium and magnesium which are lacking in the diets of many Americans including WIC participants. While the WIC food packages in the proposed rule provide the age-appropriate number of servings recommended by the 2005 Dietary Guidelines for most groups, that amount is a reduction in dairy from the current WIC packages, which provide up to four servings per day.

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I sincerely hope you will take this information under advisement and reconsider the proposed changes to the WIC package.

Sincerely,

Linda Greco, RD,LDN
20 Rue Calais
Kenner, LA 70065

HP-413

From: Louise Goggans [lgoggans45@sbcglobal.net]
Sent: Tuesday, October 24, 2006 6:21 PM
To: WICHQ-SFPD
Subject: Docket ID # 0584-AD 77

My name is Dr. Louise E. Goggans and I am retired dietitian who worked for 25 years at a public hospital in Indiananapolis IN. It took me 5 years and a great deal of red tape to get the WIC program instituted at my hospital. At the time that I was fighting to get the program put inplace, Marion County had the highest post-partum infant death rate in the nation. We were only able to get these horrible statistics lowered with the assistance provided by the WIC program and the dietary education of young, immature and impoverished expectant mothers. I feel that with the help of the WIC program we were able to save the lives of many infants and prevent the poor health of many other children and their mothers. For this reason I would question the changes that you are proposing to this program. I do think that have soy-based products available to those women who are lactose-intolerant would be a welcome option, but decreasing the amount of milk and other protein foods allowed would be a potentially negative factor that would inevitably lead to higher infant death rates again.

Louise Goggans

HP-414

Docket ID Number 0584-AD77, WIC Food Packages Rule
From: Pham, Linh [phaml@uci.edu]

Sent: Tuesday, October 24, 2006 4:05 PM

To: WICHQ-SFPD

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

I think these changes to the WIC food packaging is an excellent idea. It will be another step in combatting childhood obesity and promoting healthy eating habits.

Linh Pham, M. D.

Assistant Clinical Professor of Pediatrics

University of California, Irvine

Telephone: (714) 531 - 2220

Fax: (714) 839 - 8860

HP-416

From: Stokes Milton [milton_stokes@stbarnabas-ny.org]
Sent: Wednesday, October 25, 2006 12:05 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

I am a Registered Dietitian (RD) and would like to comment on the proposed changes to the WIC Program.

I appreciate the government's effort to improve WIC as it is a vital program supporting nutrition for women, children and infants everywhere. I have seen firsthand the success of WIC clients and do hope the program can be evaluated for continual improvement.

I have the following comments for your consideration:

1. Allow more than 1 pound of cheese per month as a substitute for milk. This permits participants to enjoy more flexibility in the program and suits a wider range of diets. Furthermore, cheese is easily tolerated, even by individuals with lactose intolerance.
2. Allow participants to substitute yogurt for milk. Few foods boast the nutritional value (i.e. probiotics) of yogurt. Plus yogurt is versatile and palatable for many participants. It's also a quick, portable food.
3. Allow all women to receive 3 servings of milk to maximize nutrition. Many of the patients we see here in the Bronx (NY) rely heavily on sugar-sweetened beverages, such as sodas and fruit beverage drinks. My preference as a clinician is to see participants provided adequate milk. When mothers drink milk it teaches children to drink milk too. We want mothers to serve as good role models for their children.

Thank you,

Milton Stokes, MPH, RD
Chief Dietitian
St. Barnabas Hospital & Nursing Home
Third Avenue & 183rd Street
Bronx, NY 10457
office: 718 960 6223
milton_stokes@stbarnabas-ny.org
fax: 718 960 6224

From: Valerie Peterson [valerie.peterson@milwaukeecountywic.com]
Sent: Wednesday, October 25, 2006 1:02 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. These additions will allow WIC to better meet the needs of its culturally diverse population.

Currently, WIC serves 8.2 million women, infants and children. Approximately half of all infants and 25% of all children under 5 in the U.S participate in WIC. The revised food packages will help our nation’s families to establish healthy eating habits – a key to preventing obesity, diabetes and heart disease.

While I am pleased that fruits and vegetables and whole grains will be added to the WIC food packages, I would like to see some other changes. Instead of just giving jars of baby food fruits and vegetables and fresh bananas, I would like to see moms have the choice between buying jars of vegetable baby food and fresh vegetables they can cook up and puree for their babies. Many of the moms I work with make their own baby foods. Homemade baby food is usually cheaper anyway. Our state WIC even has handouts for mom on how to prepare baby food and handouts on baby food recipes.

Also, I want to comment on the food packages for breastfeeding babies. The majority of our moms at our clinic breastfeed. A great number of them have to work for economic reasons. They do not not have the luxury of staying home and exclusively breastfeeding.

They are still very committed to breastfeeding, though, because they know it will help their baby be healthier. They generally breastfeed when they are at home and have their caregiver give formula when they are at work. Some of the moms try to pump 1-2 times when they are at work if they are able to find a private place to do so. I feel we especially need to support these working, breastfeeding moms with sufficient formula to cover the 8-9 hours they are away from home. Tightly restricting the amount of formula these working moms can receive will discourage them from breastfeeding. They may choose to just quit breastfeeding so they can receive a full package of formula to better cover their baby's needs.

Sincerely,
Valerie J. Peterson, RD, CD

Valerie Peterson
3637 S. 75th Street
Milwaukee, WI 53220

HP-421

From: WebMaster@fns.usda.gov
Sent: Wednesday, October 25, 2006 9:17 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Eecole Copen
EMAIL: ecopen@gmail.com
CITY: Portland
STATE: OR
ORGANIZATION:
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 25, 2006
Time: 09:17:19 PM

COMMENTS:

October 25, 2006

Eecole Copen
3943 SE Madison St.
Portland, OR 97214

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:

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

As an Oregon Dietitian, greatly invested in the health of Oregon's citizens, I am writing to show my support for the revisions in the WIC food packages proposed by the USDA. The following letter, written by the Community Food Security Coalition in Venice, California, powerfully demonstrates several reasons how and why these changes are necessary. I am in full support of their suggestions and insights as outlined below:

"In light of the severe health and dietary challenges confronting many Americans, especially lower income families and children, it is heartening to see a proposal that will

allocate a greater share of public nutrition assistance resources for the healthiest foods available. The introduction of fruits and vegetables, particularly fresh ones, for the WIC food packages will not only encourage healthy eating for the program's mothers and children now, but will also encourage a lifetime of healthier eating for the future.

Over the last 30 years, farmers' markets have played an increasingly important role in bringing fresh, locally produced fruits and vegetables to the nation's communities. Because they have been particularly successful in making fresh produce available in lower income urban and rural areas, and especially to WIC participants, we focus our comments on the proposed revisions that address the inclusion of farmers' markets as eligible vendors.

According to 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. Farmers' markets have been enormously successful in bringing a wide selection of affordable, extremely fresh, and locally grown produce to places that have been traditionally under served by other forms of affordable, retail food outlets. Among other places, the acceptance of farmers' markets by WIC participants is evident in a Los Angeles 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 and the hours of the supermarket were more convenient.

To be successful in under served, often lower income neighborhoods, 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. Such efforts have sometimes been aided by programs that provide training and start up needs to new and 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.

All in all, farmers' markets have improved the access of some of America's most nutritionally vulnerable people to fresh, affordable produce. And without good access to healthy food, nutrition education and increased buying power will have little effect.

A complementary aspect of farmers' market growth in low-income communities has been the development and gradual expansion of USDA's WIC Farmers Market Nutrition Program (FMNP), started in 1989 and further extended by the development of the Senior Farmers Market Nutrition Program in 2001. The WIC FMNP now operates in 46 states, U.S. territories, and tribal nations and served approximately 2.7 million WIC recipients in 2005, a number which represents a third of all WIC recipients. 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 among recipients. 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. Just as farmers' markets have brought fresh produce to economically distressed communities, the FMNP has brought more socially and economically disadvantaged families to farmers' markets.

The WIC FMNP has two major benefits that will enhance the effectiveness of providing special produce vouchers that can be redeemed at farmers' markets. First, the FMNP coupons in themselves provide a strong boost to the viability of low-income farmers' markets; many such markets might not operate without such a program. Secondly, by operating WIC FMNPs, states and tribal organizations have developed the organizational and administrative capacity they will need to operate the proposed WIC produce voucher program. The current procedures for WIC FMNP benefit distribution, redemption, and accountability are very 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 WIC FMNP, should allow state and tribal WIC agencies to make a relatively smooth transition to the implementation of the proposed fruit and vegetable voucher system.

In order for WIC recipients to secure as much nutritional value as possible from the use of the proposed fruit and vegetable WIC vouchers at farmers' markets, we offer the following comments and recommendations for inclusion in the WIC Food Package regulations:

- USDA shall do no harm to the WIC Farmers Market Nutrition Program either through reducing current funding levels or establishing rules, systems, or procedures at the federal or state levels that would adversely affect the operation and effectiveness of the WIC FMNP.
- Coordination shall be required between the proposed WIC fruit and vegetable voucher program and all existing and future federal-state WIC Farmers Market Nutrition Programs.
- Farmers and farmers' markets that are currently authorized under state WIC FMNP procedures shall be automatically eligible for vendor specification under the new fruit and vegetable voucher program. These WIC FMNP farmer and farmers' market authorization procedures shall also be applied by states in the future vendor specification process.

-
- ~~States shall be required to allow farmers' markets as eligible vendors for fresh fruits and vegetables, with the provision that they comply with farmers' and farmers' market authorization procedures.~~
 - Farmers and farmers' markets that are currently authorized under state WIC FMNP procedures shall be automatically eligible as WIC vendors for the new fruit and vegetable vouchers issued by the WIC program. The WIC FMNP farmer and farmers' market authorization procedures shall also be applied by states as the vendor requirements for farmers or farmers' markets for this program.
 - With respect to vendor requirements, farmers' markets shall be allowed to participate as seasonal vendors since most farmers' markets in the country are unable to operate year round. Similarly, farmers' markets shall be exempt from the "WIC-only" cost containment requirement and shall not be required to carry a full-range of WIC food package products.
 - When practicable, states should seek to develop systems for the distribution and use of fruit and vegetable 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 should be encouraged to reduce the administrative costs associated with a fruit and vegetable voucher system by developing systems that are compatible with their respective WIC FMNPs
 - In the event that states adopt EBT technology for the use of nutrition benefits by WIC recipients, farmers' markets must also be provided with the most practical EBT systems for the fruit and vegetable redemption process.

With respect to all vendors that may be specified under this program and other key operational issues for the new fruit and vegetable voucher program, the Community Food Security Coalition recommends the following rules:

- State agencies shall not have the authority to limit the range of fruit and vegetable items that may be purchased with fruit and vegetable vouchers, though preference shall be given to fresh fruits and vegetables first, then to frozen, and lastly canned.
- There shall be a cost of living adjustment reflected in the value of the vouchers in order to keep pace with inflation.
- The denomination of fruit and vegetable instruments shall be in small amounts such as \$1.00 and \$2.00 denominations.
- No change shall be given for vouchers that don't purchase their full denominational value.
- Consistent with Institute of Medicine's recommendation, we support the amount of \$10 per month of fruits and vegetables for mothers and \$8 for children.
- State advisory groups shall be established to develop the most effective and responsive system possible for operating the fruit and vegetable voucher program. 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, CFSC recommends that WIC encourage the availability of high quality fresh fruits and vegetables 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 in a variety of retail food outlets, including farmers' markets, in areas that are poorly served by such outlets."

"...I thank you 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. 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."

Sincerely,
Eecole Copen MS, Registered Dietitian
ecopen@gmail.com

HP-422

From: French, Gina MD [Gina.French@kapiolani.org]
Sent: Wednesday, October 25, 2006 8:16 PM
To: WICHQ-SFPD
Subject: "Docket ID Number 0584-AD77, WIC Food Packages Rule

I am so glad to see the alterations in the WIC package that has been proposed. The use of healthier diet standards to inform the package contents is clear in this proposed change. The early introduction of whole grains, lower fat dairy products and supporting the purchase of vegetables and fruits, has the potential not only to improve the infant's and young child's current diet, but also to help build tastes for these foods that may improve the diet for life. The only thing that could improve upon these recommended changes would be to eliminate the juice allotment and replace it with more vouchers for whole fruits and vegetables.

Thank you for the thoughtful work that went into these proposed changes

Gina French, MD

Community Pediatrics

University of Hawaii, John A Burns, School of Medicine.

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From: skihart@bellsouth.net
Sent: Wednesday, October 25, 2006 2:41 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Attachments: Docket ID 0584-AD77.ms.doc; temp_file

October 25, 2006

Ms. Patricia N. Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service, USDA
2101 Park Center Drive, Room 528
Alexandria, VA 22302

Dear Ms. Daniels,

I served as a WIC nutritionist with Valley Health Systems, located in Huntington, West Virginia from 1983- 1986. The WIC program has a solid reputation for not only providing an appropriate food package but nutrition education services. One of the goals of nutrition education is to transfer the current dietary guidelines into an understandable meal pattern for families. I applaud the move to change the fruit component from juice to fresh fruits and vegetables.

It is with some concern that I write to you regarding the United States Department of Agriculture's (USDA) Proposed Rule on Revisions to the Women, Infants and Children's (WIC) supplemental food packages. The proposed rule limits the options for milk substitution within the dairy group, which is not consistent with the 2005 Dietary Guidelines for Americans recommendations for dairy foods, and may make it difficult for women and children to meet their nutrient needs.

A 2005 Dietary Guidelines Advisory Committee Report stated the milk group is a major contributor of dietary calcium, and a substantial contributor of vitamin A, potassium and magnesium. The Dietary Guidelines state that milk alternatives within the milk food group, such as yogurt and lactose-free milk, are the easiest and most reliable way for those sensitive to lactose to derive the health benefits associated with milk and milk products.

In contrast, the proposed rule does not allow yogurt as a milk substitution, although a 2004 Institute of Medicine report, "WIC Food Packages: Time for a Change," recommends allowing yogurt.

Yogurt is an excellent source of calcium and protein, and a good source of potassium; some yogurts contain vitamin D. As recommended by the IOM, permitting women to

partially substitute yogurt for milk would provide access to a nutrient rich dairy food that is well tolerated by those who are sensitive to lactose and fits into a variety of food patterns.

Making lactose free and reduced milk, rather than soy products, the preferred substitutes for regular milk, would be consistent with the DGA and other established dietary advice. The cost of the food package must always be considered. Allowing the use of soy products will raise the cost of the food package. Dairy products are more economical and are the preferred method of delivery of key nutrients such as calcium.

The proposed rule also decreases the amount of cheese allowed for substitution of milk. At the same time, the proposed rule allows women and some children to substitute tofu or fortified soy-based beverages for milk; however, only soy beverages fortified to resemble the nutrient package in milk would be allowed.

Allowing more cheese substitution would give participants more flexibility in food choices, provide more access to an excellent source of calcium and a good source of high quality protein, and respond to cultural and dietary preferences.

USDA proposes across the board reduction in the amount of milk provided to WIC recipients, down to age-appropriate DGA servings for children and most women, which is 3 cups milk for most women and 2 cups for children up 1 through 4 years old.

Allowing all women, including non-breastfeeding women, to receive 3 servings of milk would enhance WIC participants' nutrition.

I hope you will consider the impact in changing the WIC package and its potential deleterious effect on the bone health of women and children.

Thank you for the opportunity to comment.

Sincerely,

Molly Szymanski , MA LD SFNS
Concerned Mother, Dietitian and Former WIC Nutritionist

HP-424

From: WebMaster@fns.usda.gov
Sent: Thursday, October 26, 2006 2:47 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Sau Fong Lee
EMAIL: Saufong.Lee@acgov.org
CITY: San Leandro
STATE: CA
ORGANIZATION: Alameda County Public Health -Child Health and Disability
Prevention Program
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 26, 2006
Time: 02:46:51 PM

COMMENTS:

I support all the proposed changes in the WIC vouchers based on the Institute of Medicine's recommendations. This will be a step forward in addressing the obesity epidemic for this nation. Thank you for the opportunity for input.

HP-425

From: Clint Albrecht [clinta@ext.usu.edu]
Sent: Thursday, October 26, 2006 5:34 PM
To: WICHQ-SFPD
Subject: Proposed WIC changes

My name is Clint Albrecht. I am a registered dietitian and work for Utah State University Extension. I work with food programs such as the food bank, WIC, and Food Stamp Nutrition Education. The introduction of fruits, vegetables and whole grains into the WIC program is wonderful. It will help WIC recipients eat healthier. I applaud your efforts in that area. I do have a concern with the proposed changes: Women being able to replace milk with soy in the diet, but not yogurt doesn't make a lot of sense. The decision appears purely economical. Women should only be allowed to purchase soy if they have a medical condition, just like the children have to. If you are worried so much about the cost of yogurt, could it be possible to allow only a a substitution of up to half of the allowable milk with yogurt?

There is a slight reduction in milk allowed, but I feel that the overall nutrition is better with the addition of fruits, veggies and whole grains and offsets the nutrition that the milk would have provided.

Thanks for your consideration.

Sincerely,

Clint Albrecht MS RD
Utah State University Extension
Beaver County
435-438-6452

HP-426

From: Karen Belding [karenleeb@yahoo.com]

Sent: Thursday, October 26, 2006 2:16 AM

To: WICHQ-SFPD

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

Juice should not be allowed period. I would much prefer my patients be able to change that juice allotment to a fruit allotment. Please help to stem the tide of obesity in my pediatric practice.

Karen Kamachi MD

Salinas, California

HP-427

From: SBDkids@aol.com

Sent: Thursday, October 26, 2006 11:32 AM

To: WICHQ-SFPD

Cc: SBDkids@aol.com

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

I am writing in support of the proposed changes in the WIC Food Packages. The shift is in keeping with both USDA and current medical recommendations to increase the intake of a colorful diet rich in fruits and vegetables and whole grains. The new package would increase the access to this healthful diet for families. The provision of soy options will allow WIC to better serve California extremely diverse young families. The lower cholesterol options are another important step toward creating healthy eating habits in young families and children.

In my medical practice, juice is discouraged in the first year of life. The reduction of WIC support for juice in this first year is a step in the right direction, shifting dollars toward solid foods and away from the mostly empty calories of juice.

These changes will not only affect the current young families as they incorporate a healthier diet into their lives but will also foster improved nutrition in future generations. Thank you for attending to these changes and promoting a healthier approach to nutrition for this segment of the population.

Susan B. Dab, M.D.
Pediatrician

From: WebMaster@fns.usda.gov
Sent: Thursday, October 26, 2006 11:51 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Diane Dooley MD
EMAIL: stanger@pacbell.net
CITY: Martinez
STATE: CA
ORGANIZATION: Contra Costa Regional Medical Center
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 26, 2006
Time: 11:51:07 AM

COMMENTS:

To Whom it May Concern:

Thank you for the opportunity to provide comments on the USDA's proposed regulations that substantially revise the WIC Food Packages. On behalf of the Department of Pediatrics, Contra Costa Regional Medical Center I am pleased to support these long-awaited reforms. I commend the Department for proposing important changes to WIC that are consistent with the 2005 Dietary Guidelines for Americans and align with the American Academy of Pediatrics infant feeding recommendations. I believe that, when implemented, they will greatly strengthen the WIC program's ability to improve the nutrition and health status of millions of families.

I urge USDA to conduct its analysis of the comments on the Proposed Rule quickly and publish a Final Rule by mid-2007 at the very latest. I also strongly support providing 8.2 million WIC mothers and young children with cash-value vouchers to purchase fruits and vegetables, as recommended by the Institute of Medicine's (IOM) Report: "WIC Food Packages: Time for a Change."

I support the proposals to reduce the amount of certain foods (milk, cheese, eggs, and juice) in order to better align WIC with current Dietary Guidelines and recommendations from the American Academy of Pediatrics. I particularly support the proposal to reduce juice and replace it with infant food at 6 months since many of our patients are consuming large quantities of juice with few fruit and vegetables.

The provision of whole-grain and soy options will allow WIC to better serve California's extremely diverse young families. The inclusion of lower-fat milk and less cheese and eggs supports adequate calcium intake, while at the same time lowering saturating fats and cholesterol in accordance with current dietary guidance.

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

These changes will be a major policy lever to improve community food security, address the obesity epidemic, and help low-income families make healthier food choices. Taken together, this regulatory proposal will ultimately have a positive impact on the health of women, infants and children in California.

Sincerely,

Diane Dooley MD
Chairperson, Department of Pediatrics
Contra Costa Regional Medical Center

From: Tracey Hessel [tracey_hessel@yahoo.com]
Sent: Thursday, October 26, 2006 2:21 AM
To: WICHQ-SFPD
Subject: "Docket ID Number 0584-AD77, WIC Food Packages Rule,"

Thank you for soliciting comments on the USDA's proposal to revise the WIC Food Packages.

As a pediatrician who serves a population of uninsured and underinsured families in Northern California, the majority of my patients receive WIC support. I am excited to be hearing about these long-awaited reforms that are consistent with the 2005 Dietary Guidelines for Americans and with the American Academy of Pediatrics infant feeding recommendations. I believe that, when implemented, they will greatly strengthen the WIC program's ability to improve the nutrition and health status of millions of families.

Regarding fruits and vegetables. I strongly support providing WIC mothers and young children with cash-value vouchers to purchase fruits and vegetables, as recommended by the Institute of Medicine's (IOM) Report: "WIC Food Packages: Time for a Change." While the IOM recommended \$10/ and \$8/month vouchers, the proposed rule reduced this amount to \$8/ and \$6/month in order to achieve overall cost neutrality. I urge USDA to work with Congress to secure increased federal funding in future years to bring the cash value of these fruit and vegetable vouchers up to the IOM-recommended levels, and to keep pace with inflation. This will better assist WIC families to purchase and consume fruits or vegetables each day. However, the proposed voucher levels are an excellent start and should be immediately implemented

I also support the proposals to reduce the amount of certain foods (milk, cheese, eggs, and juice) in order to better align WIC with current Dietary Guidelines and recommendations from the American Academy of Pediatrics. In particular:

The proposal will provide stronger incentives for continued breastfeeding by providing less formula to partially breastfed infants and providing additional quantities/types of food for breastfeeding mothers. To further enhance the food package for fully breastfeeding women, I urge USDA to raise the cash-value vouchers for fruits and vegetables to the original IOM-recommended amount of \$10 per month.

The proposal to reduce juice and replace it with infant food at 6

months will support recommendations by the American Academy of Pediatrics for introducing infants to fruits and vegetables at the appropriate age.

The provision of whole grain and soy options will allow WIC to better serve California extremely diverse young families.

The inclusion of lower-fat milk and less cheese and eggs supports adequate calcium intake, while at the same time lowering saturating fats and cholesterol in accordance with current dietary guidance.

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

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

Sincerely,

Tracey Hessel, MD
Pediatrician, Marin Community Clinic

From: tracy scruggs [scruggste@yahoo.com]
Sent: Thursday, October 26, 2006 4:51 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Dear Sirs,

As a registered dietitian and mother, I feel it is important to address the proposed changes to the WIC food package.

I applaud your efforts that continue encouraging & teaching mothers to breastfeed. Not only is this the most natural (and cost conscience) of foods for an infant, but promotes improved immune function and fosters important bonding between mother and child. American Academy of Pediatrics recommends that infants be breastfeed for the first year of life. I too agree.

Furthermore, thank you for proposing to eliminate juice from infant's food packages. I also agree, infants do not need juice.

Conversely, I do not agree with the proposed rule limiting the options for milk substitution within the dairy group. This change is not consistent with the 2005 Dietary Guidelines for Americans recommendations for dairy foods, and may make it difficult for women and children to meet their nutrient needs.

A 2005 Dietary Guidelines Advisory Committee Report stated the milk group is a major contributor of dietary calcium, and a substantial contributor of vitamin A, potassium and magnesium. The Dietary Guidelines state that milk alternatives within the milk food group, such as yogurt and lactose-free milk, are the easiest and most reliable way for those sensitive to lactose to derive the health benefits associated with milk and milk products.

In contrast, the proposed rule does not allow yogurt as a milk substitution, although a 2004 Institute of Medicine report, "WIC Food Packages: Time for a Change," recommends allowing yogurt.

The proposed rule also decreases the amount of cheese allowed for substitution of milk. At the same time, the proposed rule allows women and some children to substitute tofu or fortified soy-based beverages for milk; however, only soy beverages fortified to resemble the nutrient package in milk would be allowed.

For children, USDA acknowledges that dairy is a superior nutrient source for bone health, and does not allow most children to substitute soy-based beverages for milk. A comparison of the nutrients in tofu and milk would suggest that tofu cannot adequately

replace all the dairy nutrients. Yogurt and cheese are often well-accepted by those sensitive to lactose, and also appeal to varied cultural food preferences.

Both the Dietary Guidelines and the WIC program recognize the importance of dairy foods in healthy diets. While the WIC food packages in the proposed rule provide the age-appropriate number of servings recommended by the 2005 Dietary Guidelines for most groups, that amount is a reduction in dairy from the current WIC packages, which provide up to four servings per day.

The 2005 Dietary Guidelines and MyPyramid set up a foundation for a healthy diet by recommending Americans choose three servings of low-fat or fat-free milk and milk products each day. The 2005 Dietary Guidelines recognize that people who consume more dairy foods have better overall diets, consume more nutrients and have improved bone health.

I sincerely hope you will take this information under advisement and reconsider the proposed changes to the WIC package.

Sincerely,

Tracy Noerper MS, RD, LDN
Nashville, TN 37204

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HP-431

From: Pawlak, Roman [PAWLAKR@ecu.edu]
Sent: Thursday, October 26, 2006 10:54 AM
To: WICHQ-SFPD
Subject: Number 0584-ad77 - WIC food packages rules

I have heard that you are considering adding soy food and other healthful foods for WIC participants. I hope you will approve this recommendation and I commend you for doing so. It is about time that WIC participants receive that best possible foods.

Roman Pawlak Ph.D, RD

Assistant Professor

337 Rivers West Building

Department of Nutrition Dietetics

East Carolina University

Greenville, NC 27858

Ph. 252-328-2350

Fax. 252-328-4276

HP-432

From: Pitts, Sarah [Sarah.Pitts@childrens.harvard.edu]
Sent: Thursday, October 26, 2006 3:15 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

I am a doctor at Children's Hospital Boston in Boston, MA and I commend you for revising what is provided to women and children via WIC. The changes proposed generally seem very appropriate. I would make a few comments; 1) Eliminate juice completely for children of all ages. It really has not nutritional benefit over eating fruit. Just give kids fruit! If you do need to provide some juice at least make sure it's calcium fortified 2) Though decreasing the amount of dairy to remain in keeping w/ national recommendations is appropriate, bone health is also very important and children relying on WIC for sustenance are also those often at risk for Rickets. Therefore adding calcium fortified foods (even if its juice) would be important. 3) Please emphasize whole grains. If children eat brown bread from the start they will be much more likely to like it over its white counterpart.

thanks,
Sarah Pitts, MD

HP-434

From: WebMaster@fns.usda.gov
Sent: Thursday, October 26, 2006 4:08 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Kelli Raney
EMAIL: kraney@ldchd.lawrence.ks.us
CITY: Lawrence
STATE: Kansas
ORGANIZATION: Lawrence Douglas County Health Department
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 26, 2006
Time: 04:07:38 PM

COMMENTS:

I recommend that the USDA proposals be approved. The additions and reductions will be a huge benefit to children and families.

From: Stanger & Dooley [stanger@pacbell.net]
Sent: Thursday, October 26, 2006 11:45 AM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

To Whom it May Concern:

Thank you for the opportunity to provide comments on the USDA's proposed regulations that substantially revise the WIC Food Packages. On behalf of the Department of Pediatrics, Contra Costa Regional Medical Center I am pleased to support these long-awaited reforms. I commend the Department for proposing important changes to WIC that are consistent with the 2005 Dietary Guidelines for Americans and align with the American Academy of Pediatrics infant feeding recommendations. I believe that, when implemented, they will greatly strengthen the WIC program's ability to improve the nutrition and health status of millions of families.

I urge USDA to conduct its analysis of the comments on the Proposed Rule quickly and publish a Final Rule by mid-2007 at the very latest. I also strongly support providing 8.2 million WIC mothers and young children with cash-value vouchers to purchase fruits and vegetables, as recommended by the Institute of Medicine's (IOM) Report: "WIC Food Packages: Time for a Change."

I support the proposals to reduce the amount of certain foods (milk, cheese, eggs, and juice) in order to better align WIC with current Dietary Guidelines and recommendations from the American Academy of Pediatrics. I particularly support the proposal to reduce juice and replace it with infant food at 6 months since many of our patients are consuming large quantities of juice with few fruit and vegetables.

The provision of whole grain and soy options will allow WIC to better serve California extremely diverse young families. The inclusion of lower-fat milk and less cheese and eggs supports adequate calcium intake, while at the same time lowering saturating fats and cholesterol in accordance with current dietary guidance.

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

These changes will be a major policy lever to improve community food security, address the obesity epidemic, and help low-income families make healthier food choices. Taken together, this regulatory proposal will ultimately have a positive impact on the health of women, infants and children in California.

Sincerely,

Diane Dooley MD
Chairperson, Department of Pediatrics
Contra Costa Regional Medical Center

HP-439

From: Linda Evans [breastfeedingisbest2004@yahoo.com]
Sent: Friday, October 27, 2006 1:12 PM
To: WICHQ-SFPD
Subject: Docket ID number 0584-AD77

Having been a WIC dietitian for eight years, I commend you for the proposed changes in the WIC food package. My concern, however, is with the proposed change for the partially breastfed infant. While I completely understand the rationale behind this proposed change, the majority of WIC women who say they are going to breastfeed also want to be able to supplement with formula. WIC dietitians can talk until blue in the face trying to convince them not to supplement. If they don't have access to formula, they will probably opt to not breastfeed at all. Until this group of women acquires the confidence necessary to know that they can breastfeed their infants without supplementing, a partial formula package should be available. Otherwise, I'm afraid all our efforts to increase breastfeeding will be wasted.

If it has to be an all or nothing package for infants during the first month, perhaps you should consider no formula at all for any infant.

Sincerely,
Linda Evans, MHHS, RD, LD, CLC

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HP-440

From: Woo, Heide M.D. [HWoo@mednet.ucla.edu]

Sent: Wednesday, October 18, 2006 10:14 PM

To: WICHQ-SFPD

Subject: DOCKET id NUMBER 0584-AD77, WIC Food Paackages Rule

I just wanted to congratulate you on the changes in the WIC Food Package Rules. I actually think NO juice should be given to children as well as infants, but the proposed changes are definitely better than what we currently have. Thank you.

Heide Woo

Assistant Clinical Professor

Pediatrics

UCLA David Geffen School of Medicine

HP-444

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 6:07 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Zoraida McNulty, BSN, RN, IBCLC
EMAIL: zoraida@alamedanet.net
CITY: Alameda
STATE: CA
ORGANIZATION: San Francisco General Hospital
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 27, 2006
Time: 06:07:23 PM

COMMENTS:

As a Registered Nurse and Lactation Consultant, based on my practice, it is my recommendation that fruit, vegetables and low fat food be included in the WIC packages. New immigrants' babies and their families can benefit from continuing to include vegetables and fruit in their diets. This will greatly decrease their risk of obesity and poor health. Thank you for your attention to this matter.

HP-445

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 3:02 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Carol A. Miller, MD
EMAIL: millerc@peds.ucsf.edu
CITY: San Francisco
STATE: California
ORGANIZATION: University of California San Francisco Women and Childrens
Hospital
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 27, 2006
Time: 03:02:03 PM

COMMENTS:

As a pediatrician interested in promoting the health of children through healthy nutrition, I support implementation of the proposed changes to WIC. These changes are consistent with the 2005 Dietary Guidelines for Americans and with the American Academy of Pediatrics infant feeding recommendations. Specifically the proposed voucher increases are a start in the right direction towards improving low-income families' ability to provide the recommended fresh fruits and vegetables on a consistent basis to their children. It is well accepted preventing obesity and other nutritionally related disorders needs to start with the young for the best chance of success. Additionally, consistent intake of a healthy diet promotes healthy growth and development. Healthy infants and children are less likely to get sick or miss school.

Likewise the other proposed changes including making available soy products for those who are cow's milk intolerant, reducing the consumption of juice and enhanced promotion of breastfeeding are all the right things to do. I urge the USDA and WIC to move ahead to implement these excellent changes.

HP-447

From: WebMaster@fns.usda.gov
Sent: Monday, October 30, 2006 8:56 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Maria Ana Garza
EMAIL: mgarza@ldchd.lawrence.ks.us
CITY: Lawrence
STATE: KS
ORGANIZATION: Lawrence-Douglas County Health Department
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 30, 2006
Time: 08:55:57 PM

COMMENTS:

I fully support all the new proposals especially the addition of FRESH fruits and vegetables. This is a positive step forward in teaching and promoting healthy nutrition to young families.

HP-448

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 3:10 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Lois Lybeck Carelli
EMAIL: lois.carelli@ousd.k12.ca.us
CITY: oakland
STATE: ca
ORGANIZATION: Oakland Unified School District
CATEGORY: Other
OtherCategory: School Nurse
Date: October 27, 2006
Time: 03:09:45 PM

COMMENTS:

Please add more fresh fruits and vegetables

HP-450

From: warren perkins & nancy danoff [perkadan@nwlink.com]
Sent: Friday, October 27, 2006 5:16 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Package 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:

On behalf of the Washington Chapter of the American Academy of Pediatrics, I write to commend the USDA's newly proposed rules for WIC food packages. In particular, we are pleased that they reflect the majority of recommendations made by the Institute of Medicine in April 2005 and the AAP's recommendation of introduction of complementary foods at six months, rather than earlier.

Some of the most significant changes that we support are the efforts made by WIC to provide additional incentives to mothers to continue breastfeeding. Specifically, the provision of breast pumps, counseling, support, and no formula for fully breastfeeding infants in the first month of life will optimize maternal breast milk supply and the duration of breastfeeding. The proposed changes will also increase the value of food packages for fully breastfeeding mothers and infants, and reduce infant formula for partially breastfed infants. Increasing the duration of breastfeeding will lead to a myriad of improved health outcomes well documented in the medical literature, and attendant lower societal health care costs.

We also applaud your efforts to include fresh, processed or combined fruits and vegetables for infants 6-11 months of age, children and women, baby foods including meats to provide zinc and iron for fully breastfed infants, canned or dried legumes, canned beans or peas as an alternative, canned fish choices, and whole grain options. By providing a wider variety of foods, USDA has increased the cultural acceptability and palatability of the WIC packages for a growing number of participants.

We are pleased that you have eliminated juice for all infants, substituting instead baby food fruits and vegetables, reduced the amount of juice for children and women, and eliminated whole milk for children over age 2 years. These changes will aid in our ongoing efforts to stem the growing epidemic of obesity in our pediatric population.

Thank you for your efforts in ensuring optimal nutrition for WIC participants.

Sincerely,

Nancy L. Danoff, MD, MPH
Washington Chapter of the American Academy of Pediatrics
Breastfeeding Coordinator

HP-452

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 4:35 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Gail Wright RN
EMAIL: gwright@co.boulder.co.us
CITY: Boulder
STATE: CO
ORGANIZATION: County Public Health
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 27, 2006
Time: 04:35:01 PM

COMMENTS:

I agree with the proposed change to WIC allotments!

HP-453

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 6:54 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Lynne M. Yancey, MD
EMAIL: Lynne.Yancey@uchsc.edu
CITY: Denver
STATE: CO
ORGANIZATION: University of Colorado Health Sciences Center
CATEGORY: Other
OtherCategory: Medical Educator
Date: October 27, 2006
Time: 06:53:39 PM

COMMENTS:

Fabulous. We're way overdue to update these.

HP-454

WIC Food Changes
From: Clark, Anne M [AClark@Bloomhealth.org]
Sent: Saturday, October 28, 2006 10:10 AM
To: WICHQ-SFPD
Subject: WIC Food Changes

WIC works!

As a Lactation Consultant I work closely with WIC to start babies off on excellent food - Mother's Milk. The WIC program then must provide research-based programs that continue to support the nutritional health of mothers and their growing babies.

Excellent food makes excellent brains, and lean, healthy bodies.

I support WIC and I support the new updates to the food packages!

Anne Clark RN, BSN, IBCLC
Lactation Consultant
Lactation Services
Bloomington Hospital

601 West Second Street
Bloomington, IN 47403
t 812 353 5805
f 812 353 9278

aclark@bloomhealth.org
www.bloomingtonhospital.org

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Bloomington, IN 47402

HP-456

From: Heidi Westphal [mcfuzz9@hotmail.com]
Sent: Sunday, October 29, 2006 4:00 PM
HP-456

To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule/ Fargo,
North Dakota

National WIC Association

To Whom This May Concern:

I am writing with sincere concerns regarding the WIC Food Packages Rule. Cost effective care measures have become an integral part of healthcare throughout the United States. In consideration of the recent statistics which indicate that ONE-HALF of the infants in our country participate in the WIC food program, I believe it is imperative to take a deeper look at the cost of jarred infant foods. Considerations of cost effective healthcare measures should be made on the needs of the population which include immunizations, promotions toward breastfeeding, and research. The replacement of jarred infant foods with fresh or frozen fruits and vegetables, along with food preparation guidelines, will result in cost savings which could be directed elsewhere without consequence to our children.

Sincerely,
Heidi Peterson RN, MS

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HP-457

From: WebMaster@fns.usda.gov
Sent: Monday, October 30, 2006 9:56 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Heath Harmon
EMAIL: hharmon@co.boulder.co.us
CITY: Boulder
STATE: Colorado
ORGANIZATION: Bouldr County Public Health
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 30, 2006
Time: 09:56:28 AM

COMMENTS:

I support the proposed changes. They would help meet the dietary needs, not to mention they would better meet the current nutritional guidelines. Also, I feel these changes would better fit the cultural needs of WIC clients.

HP-458

From: Carol J.Eberhardt [carolje@paulbunyan.net]

Sent: Monday, October 30, 2006 10:37 AM

To: WICHQ-SFPD

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

I am a home care nurse and a grandmother concerned about the proposal to include jarred infant food in this proposal. Jarred infant food averages six times the price of pureed whole food. Use of jarred infant food also encourages the consumption of packaged toddler foods. Fresh frozen or canned fruits and vegetables are a much better choice and use of our tax dollars. Please keep this in mind when voting on the WIC food packages rule. The WIC program is a wonderful program addressing the nutritional needs of mothers and children. Let's keep it as good as it can be. Thank you, Carol Eberhardt

HP-459

From: Patricia Young [patyoungz@verizon.net]
Sent: Thursday, October 12, 2006 4:42 PM
To: WICHQ-SFPD
Subject: =?ANSI_X3.4-1968?Q?=3FDocket_ID_Number_0584-AD77=?
=?ANSI_X3.4-1968?Q??,_WIC_Food_Packages_Rule,=3F?=?

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 very pleased with the new proposed changes. I hope they include real fruit, like apples, oranges and grapes instead of juices.

I am constantly telling the mothers of my young obese patients "NO juice."

Older kids get the whole message of 1 or 2% milk, no juice, soda, iced tea, koolade or gatorade.

The number of obese children in our inner city practice is appalling.

Patricia Young, RN, APN, C

Patricia Young
10 Ferro Drive
Sewell, NJ 08080

HP-462

From: WebMaster@fns.usda.gov
Sent: Tuesday, October 31, 2006 9:31 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Jennifer Church
EMAIL: kramer-church@cox.net
CITY: Topeka
STATE: KS
ORGANIZATION: KDHE
CATEGORY: IndividualHithProfessional
OtherCategory:
Date: October 31, 2006.
Time: 09:31:21 AM

COMMENTS:

\$6-\$8 vouchers for fruits and vegetables is a good start - would recommend \$20 per month as a more reasonable amount to cover a small portion of the recommended levels of fruits and vegetables. Allowing for soy-based beverages will be wonderful for lactose-intolerant families and families from other cultures.

HP-463

From: Marion Cullen [Marion.Cullen@state.tn.us]
Sent: Tuesday, October 31, 2006 3:10 PM
To: WICHQ-SFPD
Subject: "Docket ID Number 0584-AD77, WIC Food Packages Rule"

As a public health professional, focused on infants and children growth and development I enthusiastically support the proposed change in the WIC food package. The addition of fruits and vegetables, along with soy milk and whole grains products will bring the food provided, into line with the 21st century.

However, the denial of any formula to breast feeding infants during their first month life is a major concern.

Respectfully,

Marion P. Cullen

Marion P. Cullen, Ph.D.
Data Liaison
Tennessee Department of Health
Cordell Hull Bldg./4th Floor
425 Fifth Avenue, North
Nashville, TN 37247
Phone 615-532-8188
E-Mail Marion.Cullen@state.tn.us

HP-464

From: Link, Nancy (DHS-WIC) [nlink@dhs.ca.gov]
Sent: Tuesday, October 31, 2006 7:37 PM
To: WIC HQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

November 31, 2006

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 wish to strongly support the proposed changes for the WIC food package. The changes are for the most part excellent and will increase the nutrition education taught through the example of the foods allowed - probably the most powerful teaching aspect of the Program.

As a registered dietitian who works provides nutrition education for low income clients, I especially support the following proposals:

- Providing incentives to promote breast feeding.

- Replacing some juice with fruits and vegetables. This will help reduce the excess intake of sweet liquids and increase the consumption of fruits and vegetables. In low income neighborhoods it will probably increase the availability of produce in stores.

- Reducing the amount of formula for older infants which will help prevent over consumption of milk based beverages for both older infants and young children.

- Offering alternatives to milk and cheese. This will increase the calcium rich options for cultural groups that prefer soy based foods.

- Increasing whole grains options to assist in the fight against rising childhood diabetes.

- Specifying reduced fat milk. I find some WIC participants currently think they must buy whole milk with their WIC checks. The change will support reduced fat dairy products as a healthy standard for children aged two and above and adults.

Over the years I have observed the WIC Program as a strong force in shaping family food choices. The proposed changes will help the WIC Program to better model 2005 Dietary Guidelines for Americans and recognized health organizations nutrition recommendations.

Sincerely,

Nancy Link, R.D.

Rancho Cordova and Folsom Family Clinics

191 Hartnell Place

Sacramento, CA 95824

HP-465

From: Alivia Lucci [almalu@sbcglobal.net]
Sent: Tuesday, October 31, 2006 11:35 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

I live in SF,CA

I'm strongly against not giving formula in the 1st mo. I know that this will mean that some moms will say they are not breastfeeding at all in order to get formula. This actually will discourage breastfeeding. Otherwise the changes are fantastic, fresh fruit/veg and culturally appropriate foods!!

Alivia Lucci, MS, RD

HP-467

From: Jan Persson [jan.persson@co.beltrami.mn.us]
Sent: Tuesday, October 31, 2006 12:06 PM
To: WICHQ-SFPD
Subject: DocketID # 0584-AD77WIC food packages rule

Please support the proposed changes/updates to the WIC food packages to be offered to the participants.

They deserve to be given the benefit of nutrition research to make the WIC program more effective and save their health/ the infants future health and the countries health dollars.

Do not let the associated formula, cereal companies, etc. dictate to you, by their profit margins, what to issue with the food vouchers.

Thank-you from a public heath nurse.

Jan Persson

HP-468

From: Pat Wallin [wallin.pat@gmail.com]
Sent: Tuesday, October 31, 2006 3:27 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77

Dear Sirs:

As a nutrition educator I am concerned about the proposal to allow a non-medically requested substitution of soy beverage for milk in the WIC food package. WIC clients will assume the beverage is equivalent to milk, but it is not. In addition, the poor suspension of calcium particles in soy beverages results in that mineral being largely unavailable unless the beverage is very vigorously shaken before pouring.

For WIC clients who are lactose intolerant, I recommend the option of allowing yogurt as a substitute for milk. As a fan of yogurt and fruit on my breakfast cereal, I believe such a substitution would send the correct nutritional equivalency message to WIC clients. A soy beverage substitution would send the wrong message.

Thank you for considering my concerns.

Patricia F. Wallin, MS, RD, LDN
6920 Quail Drive
Knoxville TN 37919

HP-469

From: Bonnie Walsh [bonnie.walsh@ncmail.net]
Sent: Tuesday, October 31, 2006 3:57 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Bonnie Walsh, MSE, RD, LDN
Pediatric Dietitian
CDSA (Children's Developmental Services Agency) Concord, NC

I am proposing that you discontinue juice in the infant package since you are including infant fruits and vegetables. Infant fruits have vitamin C added to them. Juice basically offers vitamin C. Eliminating Juices would be cost effective and allow more funds to go towards fruits and vegetables which are more in tune with DRI's and new recommendations. Eliminating juices also helps promote the idea that juice is not a necessity at this age. We see too much toddler diarrhea.

I am also proposing to drastically cut or eliminate juice in the children's package. Juice is not necessary. Funds would be better used towards fruits and vegetables which are rich in fiber and nutrients.

I have a concern about the elimination of whole milk after age two. This sounds good in general. But what about allowing whole milk under Food Package III for medically necessary children such as those that may be FTT or have increased caloric needs like CP, but do not quite need supplementation. I hate to think we need to give everyone a supplement because whole milk is not an option and they have increased calorie needs, but not increased protein or nutrient needs.

HP-470

From: Jodi Warshafsky [jodiwarshafsky@yahoo.com]
Sent: Tuesday, October 31, 2006 7:19 PM
To: WICHQ-SFPD
Subject: Please change the wic package

Dear Sir/Madam:

The WIC package needs to be changed to support current nutrition knowledge. We need to discourage the consumption of juice and focus on fruit and vegetables. Please listen to the nutrition experts and not the companies who just want to push their products.

Sincerely,
Jodi Warshafsky, MS, RD, CSP, LD

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<http://mail.yahoo.com>

HP-471

From: Laura Wheeler [lgwheeler1@mac.com]
Sent: Tuesday, October 31, 2006 5:05 PM
To: WICHQ-SFPD
Subject: Docket ID# 0584-AD77, WIC Food Package Rule

I am in favor of changing WIC rules to match the APA Guidelines.
However, I think it could go further regarding juice. Mothers are giving juice to young toddlers and children and very little milk. Feeding problems result as well as dental caries. I don't think that juice is indicated at all. Fruit is all that is necessary for the nutrients.

Laura Wheeler RN CPNP
Vista Community Clinic
1000 Vale Terrace
Vista, California 92084

HP-475

From: Aubey, Judy [JAubey@cityofmadison.com]
Sent: Wednesday, November 01, 2006 12:15 PM
To: WICHQ-SFPD
Cc: Levendoski, Cheryl
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

I fully support the proposed changes in the WIC food package (consistent with the comments from Patti Herrick, Wisconsin WIC Program Director). As a public health nurse and program manager, I believe it is critical that we all speak with the same voice when it comes to healthy food and healthy activity for the families we serve.

Our local population-based chronic disease program efforts will be focusing on promoting and reinforcing the healthier choices, consistent with the proposed WIC changes.

This will be a great move forward for the health of the many families served by WIC here in Madison, in Wisconsin and across the US.

Thanks.

Judith Aubey, RN, MS
Public Health Nursing Supervisor
Public Health - Madison and Dane County

HP-484

From: Zeke Christensen [zeke34@hotmail.com]

Sent: Wednesday, November 01, 2006 10:47 PM

To: WICHQ-SFPD

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

My name is Zeke Christensen

I am a Ph.D Student at the University of Kentucky working in Food Science
I am a Registered Dietitian, but not working as one right now, but my family
members are recipients of WIC. Here are my thoughts on the proposed rule
changes.

1. We have used the vouchers for fruits and vegetables from a Farmer's Market, and it is a great idea that I have been waiting a long time for. I have never understood why fruit juice was given instead of fresh fruit and vegetables (except for the cost). We don't get the juice on our vouchers very often, but the fruit and vegetable vouchers were a great addition. I guess the addition of canned fruit is a step up from juice.
2. We have a lot of extra cheese in our freezer, so I really believe that the amount of cheese offered should be decreased. Also, we tend to have leftover milk every week, so I would agree with a decrease in milk offered.
3. The addition of soy and whole grain products is another are definitely overdue. I don't have anything else to add, except that I wholeheartedly agree with this addition.

Thank you, and we really appreciate a program like WIC.

Zeke Christensen MS, RD
3178 Beaver Creek Dr.
Lexington, KY 40517

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HP-485

From: Jean Cox [jcox@salud.unm.edu]
Sent: Wednesday, November 01, 2006 5:38 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77: WIC Food Packages Rule

First of all, thank you for some excellent work. I do nutrition counseling for high risk prenatales now, but I worked for WIC for over 15 years, in two different states, and so have experience in both the good results we achieve with WIC as well as the challenges in implementing changes.

Most of your proposals sound excellent. I still have a few concerns about the new food packages:

- I would like you to try putting the yogurt back in as a milk substitute. I would vote for plain, low fat (or nonfat), possibly even in the larger containers if it made a difference in the price. I think the plain makes more sense nutritionally, we as nutritionists could promote the use, and because it is plain, I think that would limit how many people actually choose it, limiting the cost concerns.

- I have some concern about the use of soy milk. Calcium absorption is not as good as from cow's milk. See: Heaney, RP et al. "Bioavailability of the calcium in fortified soy imitation milk, with some observations on method." American Journal of Clinical Nutrition 2000;71:1166-1169.

http://www.ajcn.org/cgi/search?sortspec=relevance&author1=heaney&fulltext=&pubdate_year=2000&volume=71&firstpage=1166

Heaney estimates that the soy milk would need to contain 500 mg calcium/cup to achieve the same absorption as 1 cup of cow's milk. When I surveyed 3 local stores a few years ago, only 2 of 51 choices contained that much. If we allow soy milk, I think we need to be very careful on which brands. I understand that you want to match the other federal programs, but I would vote that they also improve their criteria, not that we water ours down.

- Regarding 2% milk for the > 2-year-olds: would there be an exception for those that are failure to thrive, if prescribed by a doctor?

- If cost is still an issue, I wonder if we could get by with less baby food.

- Regarding cost, I think the tuna in pouches is double the cost of the cans. I think our money could be better spent by disallowing pouches.

- Regarding fruits, vegetables, juice: excellent idea to reduce the juice and allow fruits and vegetables. I would cut the juices even more to increase the fruits and vegetables. I would vote for the higher nutrient fruits and vegetables (dark green, dark orange), but can understand the rationale to leave the choices more flexible. Given that, I would assume the states also should leave it as open as possible, i.e. they can't restrict it to just one or two choices. That will require lots of training of the vendor staff. I would hope that including fruits and vegetables in the regular WIC checks would not jeopardize the Grower's Market coupons. That is a separate, also excellent, program and should still be supported. Will the WIC allotments be able to be spent at the Grower's Markets during the season as well as at the grocery stores?

- Regarding the medical conditions: I am happy that the clients will now be able to receive more of the foods. However, that will require considerably more training. Who will decide which of these foods are appropriate? If it is the WIC staff, we need to create a list or table or something to clearly mark which foods might be contraindicated vs no problem with as many of the medical conditions as we can think of. (I would think a preprinted table of what could and couldn't be given might be useful in reassuring people that they are not losing foods for no reason.) If it is to be the MD that is writing the prescription for special formula, etc. and now also for the other foods, the medical community will need forewarning on what is available, the amounts, and what they need to put in the prescription. I can imagine that this area will create some stress and confusion. Speaking of the prescriptions, how long are they valid? We have put a limit of 3 months and then they need to bring a new prescription. Is that necessary? Can we as a state still do it even if it is not required at a federal level?

- A specific question: for our gestational diabetics, we routinely increase the cheese and decrease milk, change from beans to peanut butter, and remove the juice. Will we be able to increase the vegetables to a higher level if we remove the juice?

- Regarding whole grains: will we need to make a distinction between white corn and yellow corn tortillas? Any thoughts of allowing whole wheat flour or masa harina so people could make their own?

- Regarding special formulas: The proposal emphasizes the need to coordinate with Medicaid so that all sources are used to get the special formulas. Will WIC be able to give up to the maximum allowed if mom says she needs it or will WIC need to know how much the other program is giving and then WIC can give up to the maximum that we would have given.

That is, can mom end up with more formula because she is getting it from two different programs or will she be limited to the total that WIC would have given?

- I see goat milk listed, but without any discussion. It is low in folate. Are we concerned?

- I think you have a discrepancy between the Executive Summary and the body of the proposal regarding the breastfeeders > 6 months. I think the exec. summary calls them "nonbreastfeeders" while in the body they are "breastfeeders without a food package."

- Regarding your concerns about no formula for the first month causing fear in moms and, therefore, decreasing breastfeeding rather than supporting breastfeeding. First, while I understand and agree with the rationale, I think you are exactly right. Moms are going to be afraid to say they are breastfeeding and, therefore, not getting formula for a month. To get around this, we were enforcing the practice of giving the last pregnant checks after delivery. That brought them in and gave us a chance to help with the breastfeeding issues, but moms didn't feel they were having to choose to not get formula when they weren't sure. We often gave just 1/2 of that last package (we would give them the choice), thus bringing them in sooner to recertify. Their knowing they could change their minds in another week or two was often enough to let them feel they could breastfeed. Can we continue this practice? If not, could we certify them as

breastfeeders, but just give 1/2 package, to allow for the same interaction, support, and possible reevaluation?
I would think that could help with acceptance and, ultimately, with improved breastfeeding rates.

Again, thank you for your detailed and comprehensive proposal. I look forward to the implementation.

Jean Tiffany Cox, MS, RD, LN
Senior Clinical Nutritionist
Department of OB/GYN
University of New Mexico

HP-486

From: Kim Polzin [kpolzin@midwestdairy.com]
Sent: Wednesday, November 01, 2006 10:34 AM
To: WIC HQ-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, Virginia 22302

Dear Ms. Daniels,

We are writing as Registered Dietitians at the Midwest Dairy Council, covering Arkansas, Illinois, Iowa, Kansas, Minnesota, Missouri, North Dakota, eastern Oklahoma and South Dakota. While our organization is funded by all of the dairy farmers in these states, we take great pride in always basing nutrition information and the following comments on sound, peer-reviewed science.

This letter is to document our comments regarding the proposed changes to the Women, Infants and Children Supplemental Nutrition Program (WIC). Overall, we believe science supports the proposed increase in fresh fruits and vegetables and the focus on whole grain products. These proposals help align the WIC package with the 2005 Dietary Guidelines for Americans.

In addition there is sound science to support the need to also align the dairy (milk group) allowances with the Dietary Guidelines and My Pyramid. Specifically, science supports these requests:

Provide cheese for calcium and protein: Allowing more cheese substitution would provide participants with more access to an excellent source of calcium and a good source of high-quality protein. It also would help respond to cultural and dietary needs. Cheese is often well-tolerated by people who have trouble digesting lactose. On average, WIC participants currently receive approximately 2 pounds of cheese per month; a significant number of participants likely receive more than that. Even allowing 2 to 3 pounds of cheese per month would offer significant nutritional benefits to program participants.

Make lactose-free and lactose-reduced milk - rather than soy products - the preferred substitutes for regular milk: This is consistent with the Dietary Guidelines for Americans and other established dietary advice. The Dietary Guidelines say, "the most reliable and easiest way" to deal with lactose maldigestion is "to choose alternatives within the milk food group." Eliminating current paperwork or other requirements for lactose-free and lactose-reduced milk would enhance the opportunity for WIC participants to follow the Guidelines.

Permit women to partially substitute yogurt for milk: This would provide access to a nutrient-rich food that is well-tolerated by those who are sensitive to lactose and would fit into a variety of food patterns. This substitution was recommended in the Institute of Medicine report, based on yogurt's attributes as an excellent source of calcium and protein, a good source of potassium and the fact that some yogurt contains vitamin D.

Allow all women, including those who are not breastfeeding, to receive 3 servings of milk: Women who choose not to breastfeed could enhance their nutrition by meeting the Dietary Guideline's recommended levels of milk.

We appreciate the opportunity to present these scientific findings, and look forward to continuing to provide nutrition education information and materials to WIC nutrition counselors. Together, we can help WIC clients understand the nutritional benefits the milk group offers them and their children.

Respectfully,

Melissa Dobbins-Buoscio, MS, RD, LDN, CDE

Illinois

Dawn Conrad, RD, LN

South Dakota

Erika Devore, MS, RD, LD

Missouri

Celia Harkey, MS, RD, LD

Arkansas, Missouri, eastern Oklahoma

Char Heer, LRD

North Dakota

Carolyn Hudson, RD, LD

Minnesota

Mary J. Mueller, RD, LD

Minnesota

Molly Pelzer, RD, LD

Arkansas, Illinois, Iowa, Kansas, Minnesota, Missouri, North Dakota, eastern
Oklahoma and South Dakota

Nikki Stahr, RD, LD

Iowa

On behalf of:

Midwest Dairy Council

2015 Rice Street

St. Paul, MN 55113

800-642-3895

#

HP-492

From: Regan Jones RD [reganmillerjones@yahoo.com]
Sent: Wednesday, November 01, 2006 3:23 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Ms. Patricia N. Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service, USDA
2101 Park Center Drive, Room 528
Alexandria, VA 22302

Dear Ms. Daniels,

As a Registered Dietitian, I am concerned about USDA's proposed revisions to the WIC supplemental food packages. As I understand them, the proposed rules limit the options for milk substitution within the dairy group. If enacted, these changes will be inconsistent with the 2005 Dietary Guidelines for Americans recommendation for dairy foods, and most importantly may make it difficult for women and children to meet their nutrient needs.

When finalizing this portion of the WIC package, please consider the following:

Milk contributes substantial nutrition to the American diet

- o The 2005 Dietary Guidelines Advisory Committee Report reinforced the notion that milk group foods are a major contributor of dietary calcium, and a substantial contributor of vitamin A, potassium and magnesium to the American diet.

The milk group offers many nutritious milk alternatives

- o The Dietary Guidelines for Americans (DGA) state that milk alternatives within the milk food group, such as yogurt and lactose-free milk, are the easiest and most reliable way for those sensitive to lactose to derive the health benefits associated with milk and milk products.

- o Making lactose free and reduced milk, rather than soy products, the preferred substitutes for regular milk, would be consistent with the DGA and other established dietary advice.

Yogurt is a crucial choice as a milk alternative

- o A 2004 Institute of Medicine report, "WIC Food Packages: Time for a Change," recommends allowing yogurt. As recommended by the IOM, permitting women to partially substitute yogurt for milk would provide access to a nutrient rich dairy food that is well tolerated by those who are sensitive to lactose and fits into a variety of food patterns.

- o Not allowing yogurt as a milk substitution in the WIC packages not only limits the variety of the participants' diets, but also, and most importantly, eliminates a viable, nutritious substitution for milk.

- o Yogurt is an excellent source of calcium and protein, and a good source of potassium; plus many yogurts contain vitamin D.

Cheese can be a good choice

- o Allowing more cheese substitution would give participants more flexibility in food choices, provide more access to an excellent source of calcium and a good source of high quality protein, and respond to cultural and dietary preferences.

o While the proposed rule decreases the amount of cheese allowed for substitution of milk, it allows women and some children to substitute tofu or fortified soy-based beverages for milk. These foods are not nutritional equivalents to milk and allowing them as such would create a nutritional void in the participant's diet.

I thank you for the opportunity to comment on these proposed changes. I trust the organization will make a well-informed decision to meet the best interests of those affected by this program.

Sincerely,

Regan M Jones RD
President-The Professional Palate
Palm Coast, FL

HP-496

From: doceve@aol.com
Sent: Wednesday, November 01, 2006 11:29 PM
To: WICHQ-SFPD
Cc: doceve@aol.com
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Dear Ms. Daniels,

Patricia N. Daniels Director Supplemental Food Programs Division Food and Nutrition Service U.S. Department of Agriculture 3101 Park Center Drive Room 528 Alexandria, VA 2230

Dear Ms. Daniels,

I would like to express my support for the proposed revisions to the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) food packages, as published in the Federal Register on August 7, 2006. I AM ESPECIALLY PLEASED WITH THE ADDITION OF MEAT AT 4-6 MONTHS TO THE PACKAGE. THIS WILL GO A LONG WAY TO ALLEVIATING PICKY EATERS AND PREVENTING IRON DEFICIENCY ANEMIA IN THE POOR CHILDREN OF AMERICA. I ENCOURAGE YOU TO BE SURE THAT THE MEAT OPTIONS REMAIN. Since its creation in 1972, WIC has provided nutrition education, supplemental foods, and medical referrals to millions of low-income pregnant women, mothers and children. In 2000 alone, the WIC program served 54 percent of all U.S infants and 25 percent of all U.S. children ages 1 year through 4 years. Unlike food stamps or other human services programs, WIC provides specific nutrients to these populations based on their needs at various stages of development. Given that only minor changes have been made to the WIC food packages since 1980s, however, they no longer reflect the best nutritional practices to meet the needs of beneficiaries.

As a pediatrician and child health advocate who serves families that participate in the WIC program, I strongly support the changes proposed to the WIC food packages, including:

--the addition of fresh fruits and vegetables for both mothers and children; -- an enhanced package for fully breastfeeding mothers; --the establishment of new packages for partially breastfeeding mothers and partially breastfed children; --the emphasis on low-fat options, and more substitutes for milk; --the sharp reduction in juice allocations; --the addition of whole grains In order to encourage breastfeeding, I urge the USDA not to establish pilot projects of the new food packages for partially breastfed infants and partially breastfeeding mothers, but to implement them as quickly as possible. However, the issue of whether to provide formula in the first month of an infant's life should be studied in greater detail, as recommended by the American Academy of Pediatrics. In addition, all of the proposed changes must be studied carefully to ensure they are achieving their policy goals.

The new WIC food packages will mark a significant change in the eating habits of participating mothers and children. I commend the USDA for its thoughtful proposal, and I appreciate this opportunity to submit comments.

Sincerely,

C Eve J Kimball

301 Penn Ave #200
Reading, PA 19611

HP-499

From: WebMaster@fns.usda.gov
Sent: Wednesday, November 01, 2006 12:36 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Jane McKinley
EMAIL: jmckinley@co.boulder.co.us
CITY: bould
STATE: co
ORGANIZATION: Boulder County Health Department
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: November 01, 2006
Time: 12:36:29 PM

COMMENTS:

Great plan.
Will there need to be guidance re: mercury to go with fish consumption?
Otherwise these are EXCELLENT proposed changes that will assist families to know better what to provide for their children and themselves.

HP-504

From: Cathy Nieman [cnieman@charter.net]
Sent: Wednesday, November 01, 2006 1:15 PM
To: WICHQ-SFPD
Subject: WIC Revision, Docket ID # 0584-AD77

As a registered dietitian I strongly support the long-overdue revisions to WIC food packages. I urge the USDA to publish the final rules as soon as possible. It's time that we make optimal nutrition a priority.

Sincerely,
Cathy Nieman, MS, RD
312 Ivy Hill Road
Weaverville, NC 28787

HP-505

From: WebMaster@fns.usda.gov
Sent: Wednesday, November 01, 2006 8:26 PM
To: WIC HQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Pat McKnight, MS, RD, LD
EMAIL: Mcknightp@aol.com
CITY: Columbus
STATE: Ohio
ORGANIZATION: Ohio Dietetic Association
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: November 01, 2006
Time: 08:26:17 PM

COMMENTS:

The members of the Ohio Dietetic Association, the majority of whom are licensed, registered dietitians, are very interested in the proposed changes in the WIC package. We applaud USDA's change to add more fruits and vegetables -- a much needed change !!! However, we are very concerned about the reduced access to milk. With the mounting evidence of the incidence of osteoporosis, we don't need to do anything that would reduce the availability of the recommended 3 servings of milk each day. The WIC package should include the three servings of milk with the option of yogurt, lactose-free milk and possibly calcium-fortified soy milk. The nutrients provided by milk are extremely important and the Dietary Guidelines for Americans as well as Institute of Medicine recommendations support the need for adequate milk. Please consider our comments as the rules are finalized. Pat McKnight, MS, RD, LD, Legislation Chairman, Ohio Dietetic Association

HP-511 ..

From: Debbie Jones [djones@northeasternhealth.org]
Sent: Thursday, November 02, 2006 12:45 PM
To: WICHQ-SFPD
Subject: Docket Id Number 0584-AD77, WIC Food Packet Rule

Hello, I am a Health Educator for Northeastern Rural Health Clinics in Susanville, California. I would like to encourage the US Dept. of Agriculture to approve the recommendations for change in the food packets distributed by WIC. What I like most about the changes are the inclusion of lower fat milk and less cheese & eggs to reduce the saturated fat intake of our youth. I work with many adults daily trying to lower their cholesterol to reduce their cardiac risks. Perhaps my work load in the future will be lowered as a result of this change. But certainly the health of our future will be improved.

Sincerely,
Debbie Jones
Health Educator

HP-512

From: Bette Seaman [Bette@Chugachmiut.org]
Sent: Wednesday, November 01, 2006 3:06 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, U.S. Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, VA 22302

November 1, 2006

Dear Ms. Daniels:

As a health professional, I strongly support the WIC Food Packages Proposed Rule and the U.S. Department of Agriculture's (USDA) efforts to better align the food packages with the Dietary Guidelines for Americans. As USDA finalizes the regulations, please consider the following suggestions to further strengthen the final rule.

-- I strongly encourage USDA to provide the full fruit and vegetable benefit recommended by the Institute of Medicine. Also, I recommend that the final rule require that the value of the fruit and vegetable benefit regularly receive cost of living adjustments (COLA).

-- I strongly support the proposed rule on the elimination of fruit juice for infants and decreasing in the quantity of juice for children and women.

-- I support the promotion of whole grains in the revised food packages. Also, I support retaining the proposed limit on sugars in WIC cereals.

-- Bringing the quantity of milk in the WIC food packages in line with the Dietary Guidelines is another important recommendation in 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 reflect the recommendations in the Dietary Guidelines and to help to reduce saturated fat intake and the risk of heart disease. I support the proposed rule regarding allowing soy-based beverages and calcium-set tofu as substitutes for milk in Food Package IV, V, VI, and VII.

-- I do not support the proposed rule regarding reducing the quantities of cheese and eggs in the food packages to help decrease saturated fat and cholesterol intake. Women in our communities have a very high risk and rate of gestational diabetes. They live in small communities that may not have low fat cheeses available. Eggs are a healthy breakfast option for a woman with gestational diabetes.

-- I strongly support USDA's proposed revisions to the WIC food packages to provide greater incentive for breastfeeding. I strongly believe that the peer

counselor program is helpful to help maintain breastfeeding in at risk women. Also, I support the proposed rule's inclusion of a greater variety of options throughout the food packages to promote greater acceptability of WIC foods by participants.

Overall, I strongly support USDA's proposed rule for updating the WIC food packages. I 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,

Bette Seaman, RD, CDE

1435 Bay Ave.

Homer, AK 99603

betteseaman@gci.net

HP-520

From: Nancy Allende [nallende@co.riverside.ca.us]
Sent: Thursday, November 02, 2006 1:56 PM
To: WIC HQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

As a Registered Dietitian working in the Public Health setting for the past 16 years, I applaud USDA's efforts in changing the "outdated" WIC food package. I think it is time for a change. In the past 30 + years since WIC's inception, our population has changed and our public health issues have changed, but the WIC food package has not changed! In the United States, we have seen a dramatic rise in childhood obesity and other diseases once, only seen in adults, like Type 2 diabetes, high blood pressure and high cholesterol. When I see small children already overweight and in some cases obese, I'm saddened to think what the future ahead looks like for them.

Decreasing juice and adding fruits and vegetables is an excellent idea.

Juice, although many argue is 100% juice high in Vitamin C, no sugar added still contributes calories which our children don't need. They can still get the Vitamin C, plus fiber (which isn't found in juice) by eating fruits and vegetables which are lower in calorie. If fruits and vegetables are added to the package, please consider the dollar amount. A \$6 to \$8 budget for fruits & vegetables, won't buy you much when you consider how expensive fruits and vegetables can be, at least here in California. (I understand that USDA is trying to make the changes and still remain cost neutral. Let's consider if other things can be decreased slightly to increase the dollar amount for fruits and vegetables.)

I strongly support the decision to decrease the cheese and eggs in the food package. This will decrease the amount of saturated fat and cholesterol our families are consuming. By adding the option of canned beans, which are low in calorie, high in protein and high in fiber, families can still get the needed protein without all that saturated fat and cholesterol, which contribute to the incidence of heart disease and obesity.

Thank you for considering culturally diverse foods in the new proposed WIC food package. The option to get soy beverages, tofu, and corn tortillas is wonderful! We need to be culturally sensitive to WIC participants food preferences.

I fully support your decision to only allow whole milk for children 1-2 years of age. Children and adults don't need the added saturated fat and calories which whole milk contains. 2%, 1% and fat free milk - are just as nutritious with calcium, Vitamin A, and Vitamin D, but without the high fat in whole milk. As a mother of an 11 year old daughter, right after she turned 2 years of age, I switched her completely over to fat free milk. She will not drink whole milk or 2% milk. Children will like lower fat milk, if that's what they're given.

If our families are exposed to a lower fat milk early on, then they will get accustomed to drinking it.

Please consider only offering 1% and Fat Free milk for women and children over 2 years of age. 2% milk is still quite high in fat and calories. Back in 1994, I worked on a special project in California with Project LEAN to promote a 1%

milk campaign. We went to a WIC site and allowed participants to taste test (2) types of milk - Whole milk and 1% milk, without knowing which milk they were drinking. A high percentage of WIC participants preferred the 1% milk over the whole milk, or couldn't even taste the difference.

As a public health professional, we need to advocate for our participants. I know there will be many special interest groups lobbying to "not decrease" this or that, but please let's do the right thing for our WIC families. The Institute of Medicine studied the WIC packet and made recommendations for many of the proposed changes.

Please rule on the WIC food package quickly, so that WIC families can benefit from these changes right way.
Thank you for your time.

Sincerely,

Nancy Allende R.D.
Supervising Nutritionist
Riverside County, California
(951) 358 - 5889 work
(951) 789 - 1734 home

HP-527

From: Camargo, Carlos Arturo, Jr., M.D. [CCAMARGO@PARTNERS.ORG]
Sent: Thursday, November 02, 2006 12:06 PM
To: WIC HQ-SFPD
Subject: WIC Food Packages Rule, Docket ID Number 0584-AD77

Patricia 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:

As a health professional and member of the 2005 US Dietary Guidelines Advisory Committee, I strongly support the WIC Food Packages Proposed Rule and the U.S. Department of Agriculture's (USDA) efforts to better align the food packages with the Dietary Guidelines for Americans. As USDA finalizes the regulations, please consider the following suggestions to further strengthen the final rule.

-- Provide the full fruit and vegetable benefit recommended by the Institute of Medicine.

-- Require that the value of the fruit and vegetable benefit regularly receive cost of living adjustments (COLA).

-- Limit sodium in canned or frozen vegetables to no more than 480 mg per serving (the disqualifying level for the Food and Drug Administration's [FDA] "healthy" claim).

-- Eliminate fruit juice for infants and decrease the quantity of juice for children and women in the food packages.

-- Promote whole grains in the revised food packages.

-- Retain the proposed limit on sugars in WIC cereals.

-- Bring the quantity of milk in the WIC food packages in line with the Dietary Guidelines, but also require that all milk in the food packages for children ages 2-4 years and women be low-fat (1%) or fat-free (skim), to reflect the recommendations in the Dietary Guidelines and to help to reduce saturated fat intake and the risk of heart disease.

-- Allow soy-based beverages and calcium-set tofu as substitutes for milk in Food Package IV, V, VI, and VII.

-- Reduce the quantities of cheese and eggs in the food packages to help decrease saturated fat and cholesterol intake. To further help WIC participants limit their saturated fat intake, I urge USDA to require all cheese offered in the food packages to be light, reduced, or low in fat to be consistent with the recommendation in the Dietary Guidelines to select milk products that are low fat or fat free.

-- Provide greater incentive for breastfeeding.

-- Include a greater variety of options throughout the food packages to promote greater acceptability of WIC foods by participants.

Overall, I strongly support USDA's proposed rule for updating the WIC food packages. I 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,

Carlos Camargo

Carlos A. Camargo, MD, DrPH

Massachusetts General Hospital

326 Cambridge St, Suite 410

Boston, MA 02114

Tel: 617-726-5276

Fax: 617-724-4050

HP-528

From: Beth Clark [beth.clark@SDARC.org]
Sent: Thursday, November 02, 2006 6:34 PM
To: WICHQ-SFPD
Subject: FI Food Package Change

Nov. 1, 2006

Ms. Patricia 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

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, published in the Federal Register on August 7, 2006.

Thank you for the proposed changes to the FI food packages. This will be a very exciting and beneficial change to the WIC Program and the participants will enjoy the change.

DISLIKES:

1.. Infant food Package: I would not recommend providing baby jar foods overall. We do encourage participants to make their own baby food. IF you MUST provide baby jar foods- I would recommend providing VEGETABLE Jar food only. Participants are more likely to purchase the fruit over the VEGETABLE and root vegetables, such as carrots, would be safe to purchase via jar than homemade.

Likes:

- 1.. Limiting the cheese,
- 2.. adding soy milk and low fat yogurt,
- 3.. adding canned beans for all categories,
- 4.. adding whole grains,
- 5.. Different forms of fruit and vegetables offered

Recommendations:

- 1.. use Enriched Soy Milk and having no limitation on who could received it-
no Rx needed for soy product use,
- 2.. canned fruits: offer only in a water based solution, .
- 3.. Canned vegetables: no added salt.
- 4.. If the participants could BUY Fruits and vegetables, that would be the
most preferred choices to offer,
- 5.. Offer one 2% milk check and the others 1% milk. The 2 percent milk is a
nice transition phase for the participants to wean off of whole milk, yet
ultimately we do encourage participants to use 1% or non-fat milk to reduce the
national obesity issue.

Thank you

Beth Clark, Registered Dietitian

HP-530

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 1:08 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Jan Ritter, RD, LD
EMAIL: ritterj@pediatrics.ohio-state.edu
CITY: Powell
STATE: Ohio
ORGANIZATION: Columbus Children's Hospital
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: November 02, 2006
Time: 01:08:10 PM

COMMENTS:

I am in favor of the WIC proposal to include more fruits and vegetables. I would add that USDA should consider making recommendations for both lactose-free milk and yogurt. These foods are well tolerated by lactose intolerant individuals and include a unique nutrient profile needed for health. I recommend that USDA include in the mandate:

Making lactose-free milk, rather than soy products, the preferred substitutes for regular milk for those who are lactose intolerant which would be consistent with the DGA and other established dietary advice.

As recommended by the IOM, permitting women to partially substitute yogurt for milk would provide access to a nutrient-rich dairy food that is well-tolerated by those who are sensitive to lactose and fits into a variety of food patterns. Allowing all women, including non-breastfeeding women, to receive 3 servings of milk each day would enhance WIC participants' nutrition.

HP-531

From: Dabney, Debbie [Debbie.Dabney@snco.us]
Sent: Thursday, November 02, 2006 9:21 AM
To: WICHQ-SFPD
Subject: comments

I am favor of the new changes to the WIC program, including whole grains and fruits, etc. I work with a lot of WIC families and they would benefit from these changes.

Debbie Dabney, RN
Public Health Nurse/Health Agency

HP-533

From: Dietzman, Jane [Jane.Dietzman@CO.DAKOTA.MN.US]
Sent: Thursday, November 02, 2006 9:43 AM
To: WICHQ-SFPD
Subject: comments on new WIC proposal

I have been a Public Health Nurse for 35 years and have always encouraged the support and use of the WIC program. I always refer to it as "the best federal program" The combination of nutrition and health education and services is a wonderful asset to families. I believe the new proposal is an excellent choice for meeting new nutrition guidelines and making a great program even greater! Thanks for all the effort and energy given to this work.

Sincerely,
Jane Dietzman

HP-535

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 7:38 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Diane Dressler, LLLL, IBCLC
EMAIL: drsdmrco@adelphia.net
CITY: Florence
STATE: VT
ORGANIZATION: La Leche League and Private Practice LC contracting with state
WIC agency
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: November 02, 2006
Time: 07:38:22 AM

COMMENTS:

All in all these are very good changes, especially after thirty years. However, the proposed option to offer formula to breastfeeding mothers is troubling.

Without guidelines, it relies on interpretation of need by the certifier as well as the level of breastfeeding advocacy and counseling skill of the certifier. What if, in the initial presentation of food package options to the mother, she were informed that she could have formula if she wanted it? "You are breastfeeding, but if it's not going well . . ."

I would like to see some appropriate reasons for need as guidelines for certifiers.

Many people interpret this "just in case" option as showing a lack of confidence in breastfeeding and in the women who choose it. It does not present breastfeeding as the normal way to feed infants.

HP-536

Clear DayFrom: Glenn, Amber [Amber.Glenn@snco.us]
Sent: Thursday, November 02, 2006 1:40 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD777, WIC food package 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.

I am a Dietitian working with WIC and I think the proposed changes of adding fruits and vegetables, whole grains, soy milk, canned beans, and other changes will help improve the nutrition status of the clients WIC serves.

I provide nutrition counseling to many WIC clients and it is frustrating to educate them on limiting juice and choosing reduced fat milk when they are getting these very non-nutritious items free from the WIC program. The revised food packages will help our nation's families to establish health eating habits - a key to preventing obesity, diabetes and heart disease.

I support USDA's proposal to revise the WIC food packages and urge USDA to finalize the rule as soon as possible.

Sincerely,

Amber Groeling RD, LD
Health Educator
Shawnee County Health Agency
1615 SW 8th Ave.
Topeka, KS 66606
ph. (785) 368-2030
fax (785) 368-2070

HP-538

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 6:49 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: eva redd hornsby
EMAIL: redd_hornsby @sbbc global.net
CITY: oakland
STATE: ca
ORGANIZATION: ousd, oakland ca 94606
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: November 02, 2006
Time: 06:49:18 PM

COMMENTS:

I believe these changes will be a welcome addition to the general health and welfare (not to mention the basic nutritional status) of all our mothers and children. I'm happy to see that someone is thinking of our future, because these children are our future.

HP-539

From: bibarro@harthosp.org
Sent: Thursday, November 02, 2006 1:47 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Patricia Daniels
Food and Nutrition Service, USDA
3101 Park Center Drive, Room 528
Alexandria, VA 22302

Dear Patricia Daniels,

As a concerned citizen, and registered dietician, working with the inner city WIC population in a large teaching hospital obstetric clinic. I very strongly support the U.S. Department of Agriculture's (USDA) efforts to improve the nutritional quality of the WIC food packages.

I strongly urge the USDA provide the full fruit and vegetable benefit as recommended by the Institute of Medicine. I applaud the promotion of whole grains in the revised food packages, and limiting sugars in WIC cereals.

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,

Brunella Ibarrola
95 Waverly Drive
Newington, Connecticut 06111

HP-542

From: Amy Huffman [Amy.Huffman@us.army.mil]
Sent: Tuesday, October 17, 2006 11:18 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.

This is awesome and what a great way to support moms and babies. nutrition is so very important and breastfeeding is the base of perfect infant nutrition. Breastfeeding is a choice and it is wonderful to see that this new proposed packaging rule will not only give better nutrition to mothers and babies, but also support breastfeeding.

Adding 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. Not to mention to meet all moms needs.

The health of these babies that will be greatly increased is awesome for the future of our nation.

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

I once used WIC myself.

Thank You Again,
Blessings,

Amy Huffman
mother of 3
LLL Leader
Army Wife

Amy Huffman
134 Monteburg Rd.
Fort Bragg, NC 28307

HP-547

From: Catherine Wiley, MD [cwiley@ccmckids.org]
Sent: Wednesday, October 18, 2006 3:50 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. These additions will allow WIC to better meet the needs of its culturally diverse population.

As a pediatrician, I particularly applaud the elimination of juice in the food package for infants. I have found that inclusion of juice endorses the inappropriately early introduction of juice. Infants are adversely affected through excessive sugar consumption, prolonged "juice bottle" use and development of dental caries, the most common chronic disease of childhood.

Currently, WIC serves 8.2 million women, infants and children. Approximately half of all infants and 25% of all children under 5 in the U.S participate in WIC. The revised food packages will help our nation's families to establish healthy eating habits – a key to preventing obesity, diabetes and heart disease.

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

Catherine Wiley, MD
282 Washington Street

Hartford, CT 06033

HP-555

From: MERRIE MACDOWELL [mermid12@msn.com]
Sent: Saturday, October 21, 2006 8:02 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Hello - Just wanted to comment on the proposed changes in WIC benefits. I think they are GREAT and sorely needed. I serve many low income mothers, and know that they will eat better quality food and be more likely to breastfeed their babies with these changes.

Best Regards-

Merrie MacDowell
Registered Midwife

HP-556

From: lillysweets@peoplepc.com
Sent: Saturday, October 21, 2006 3:06 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

I applaud Agriculture Secretary Mike Johanns and USDA's Food & Nutrition Service for the release of their proposal recently to update the food packages for the Special Supplemental Nutrition Program for Women, Infants and Children, known as WIC. Since the WIC Program's inception in 1974 changes to the WIC food packages have been minimal. This proposal represents the most significant and meaningful changes ever proposed and ensures that the food packages will be consistent with the 2005 Dietary Guidelines for Americans and the current infant feeding practice guidelines of the American Academy of Pediatrics.

Thank you, thank you, thank you!

Candace McCollett
Doula & Childbirth Educator
The Westside Birth Connection
719-213-3740
<http://www.csdoulas.com>
Treasurer, Pikes Peak Regional Doula Association
Volunteer Doula for Operation Special Delivery
Taking the FEAR out of childbirth

From: Melissa Dorbeck [mdorbeck@comcast.net]
Sent: Monday, October 23, 2006 8:07 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

I am a La Leche League leader here in Jackson, Michigan. I nursed both my children and have been active in our local group for 18 years.

We have many young mothers on the WIC program here in Jackson County. I am not sure how many breastfeed their babies and if so, for how long.

Some of the things that mothers need to be successful at breastfeeding are:

- 1.. Believing that breastfeeding is the best for their baby;
- 2.. A desire to do what is best for their baby;
- 3.. Support from BOTH the medical community and the mother's family;
- 4.. Help when problems arise;
- 5.. Good/correct information before the baby is born;
- 6.. Support from other nursing mothers; and
- 7.. Support from employers.

There has even been a group formed in Jackson County called the Community Breastfeeding Coalition. The purpose of the Coalition is to promote breastfeeding in our county. I am also part of that group.

There are many rules that can be made, but this does not necessarily change people's beliefs and desires. I believe that a community should work together to help ensure the success of breastfeeding. But first, they need to be educated on how their baby will benefit from breastfeeding.

La Leche League has been helping mothers breastfeed their babies for 50 years. LLL International is active in 40 countries around the world. LLLI is the number one source for breastfeeding information. Visit their web site at www.lalecheleague.org.

Melissa Dorbeck
La Leche League Leader
Jackson, Michigan

HP-562

From: Guarino, Annrose M. [AGuarino@agcenter.lsu.edu]
Sent: Monday, October 30, 2006 2:48 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

To Whom It May Concern:

I strongly support the WIC Food Packages Rule referenced above as it will add nutritional value to our tax dollars going into this program. Once a mother and or child suffer from poor nutrition, society will have a lifetime of subsequent ill health effects.

Annrose Guarino, PhD, RD, LDN

P.O. Box 219

Laplace, La 70069

985-652-9762

HP-563

From: WebMaster@fns.usda.gov
Sent: Monday, October 30, 2006 12:55 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Greta
EMAIL: Heru
CITY: Memphis
STATE: TN
ORGANIZATION:
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 30, 2006
Time: 12:54:53 PM

COMMENTS:

Dear Sirs,

As a Professional in Family and Consumer Sciences I would like to address the proposed changes to the WIC food package. It is of great concern to me that soy beverages are being allowed as a substitute for milk. Soy beverages do not have the same nutrient profile as cow's milk.

A 2005 Dietary Guidelines Advisory Committee Report stated that the milk group is a major contributor of dietary calcium and a substantial contributor of vitamin A, potassium and magnesium. The Dietary Guidelines state that milk alternatives within the milk food group, such as yogurt and lactose-free milk, are the easiest and most reliable way for those sensitive to lactose to derive the health benefits associated with milk and milk products.

It is also of concern to me that the proposed rule does not allow yogurt as a milk substitute. Yogurt has the same nutrients as milk and is more easily digested by those who are lactose intolerant. Both the Dietary Guidelines and the WIC program recognize the importance of dairy foods in healthy diets. Dairy products provide a unique package of nutrients and these important nutrients are lacking in the diets of many Americans, including WIC participants.

The 2005 Dietary Guidelines and MyPyramid set up a foundation for a healthy diet by recommending Americans choose 3 servings of low-fat or fat-free milk and milk products each day. The 2005 Dietary Guidelines recognize that people who consume more dairy foods have better overall diets, consume more nutrients and have improved bone health. I

sincerely hope you will take this information into consideration and reconsider the proposed changes to the WIC package.

Sincerely,
Greta Heru
Professional in Family and Consumer Sciences