

OS/LA -1

Sent: Monday, August 07, 2006 2:11 PM

To: WICHQ-SFPD

Subject: WIC changes

Docket ID Number 0584-AD77, WIC Food Packages Rule

I looked through the proposed changes briefly this morning and I am thrilled by the positive changes I see in the proposal. I work with the Head Start program and I see the results of uneducated parents giving their small children too much juice and not enough fresh fruits and vegetables. Many times I have been behind women in the checkout stand at the grocery store, where they are only there to get their WIC items and have no cash to buy fruits, vegetables, grains and protein items. Increasing the whole grains will help the frequent issue of inadequate fiber in the diet. Lowering the fat content will initiate the habit of consuming lower fat grocery items in their diets. In California WIC gives out coupons for the Farmer's Market for fruit and vegetables. I have listened to these WIC clients as they purchase these items and have been pleased by their positive comments. Often when they have their children with them, they participate in choosing what to buy, which I believe gives these children an interest in fruits and vegetables. I have been waiting to see these changes for years. Thank you for acting on the need for these dietary changes.

OSLA-2

Sent: Tuesday, August 08, 2006 11:10 AM

To: WICHQ-SFPD

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

To whom it may concern,

I would like to express my support for the USDA's proposal to allow Farmers' Markets vendors to accept WIC for fresh fruits and vegetables. While the current Farmers Market Nutrition Program is a wonderful resource, mothers could have even broader access to the freshest, most nutritious produce throughout the growing season here if they were allowed to use their WIC vouchers as well.

As a nutrition educator who does cooking and nutrition programs at the farmers markets throughout Rhode Island, I have seen the positive results of the FMNP. But, I would love to see the families that now come to the markets a few times a year start being able to come every week throughout the season. What a great way for kids and moms to get on the track to healthier lives- with just-picked tomatoes, corn, apples, and green beans that they get to purchase straight from the farmer!

I think the proposal to accept WIC vouchers at farmers markets for fresh fruits and vegetables would be the best thing the USDA could do for mothers and children in Rhode Island, as long as no funds are cut from the current Farmers' Markets Nutrition Program.

Thank you for your time,

RI Family Nutrition Program
URI Providence Campus
Providence, RI

Talk is cheap. Use Yahoo! Messenger to make PC-to-Phone calls. Great rates starting at 1¢/min.

OS/LA-3

Sent: Wednesday, August 09, 2006 6:58 PM
To: WICHQ-SFPD
Subject: FW: "Docket ID Number 0584-AD77, WIC Food Packages Rule,"

Sent: Wednesday, August 09, 2006 3:57 PM
To: 'wichq-sfpd@fns.usda.gov'
Subject: WIC proposed changes

i'm supportive of these proposed changes:

- adding new foods such as fruits, vegetables, and whole grains;
- providing only lower fat milk to women and children over two years old; and
- offering soy beverage and tofu as alternatives to milk.

Sincerely,

Shasta County Public Health
Redding, CA 96001-4297

Shasta County residents live thirty years longer on average than a century ago. Twenty-five of those years of life gained are due to Public Health measures.

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OS/LA-4

August 8, 2006

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

Dear Ms. Daniels,

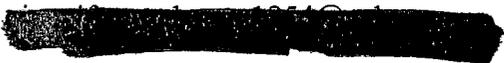
I am writing to comment on the proposition by the USDA to include fruits, vegetables and whole grains into the food package for people participating in the WIC program.

The new proposition is a wonderful and much needed adjustment to the program! I coordinate the Youth Nutrition Program for the Northern Illinois Food Bank and plan healthy supper, lunch and snack menus for our youth sites. What often shocks me is the level of unfamiliarity the school-aged children have with healthy foods. The first year of our After-School Snack Program, all 22 children at one site in Rockford, IL would not touch the baby carrots because they had never seen them before. Just this summer, during the Summer Food Service Program, a site in Elgin, IL told us that many of the children in their program did not like the broccoli because they had never eaten it at home. It is exciting to be able to provide exposure to healthy food items (with the help of the USDA Child and Adult Care Food Program and Summer Food Service Program), but it is disheartening to know that they have to wait until they are in school to start receiving that exposure. Studies show that it can take up to 21 points of exposure before a child will accept a new food item; if the process does not begin early, children do not learn to like or try healthy foods and their health suffers. The WIC food package adjustment will enable mothers to provide their children with the opportunity to learn to like fresh fruits and vegetables before they go to school.

While supporting this change to the WIC food package, I am disappointed that the monthly value will decrease for children ages 1-5. I do agree that the children do not need 9 oz of juice per day, especially if they are receiving fresh fruits and vegetables. However, it is unwise to cut the amount of milk and other items given to children during some of their most important stages of brain and body development. The value should be left as it is. If they do not receive the needed nutrition during these years, they will be one step behind before they even start their education. Since education is one of the most important factors in their ability to escape poverty in the future and excel in society, we need to prepare them now for the beginning of their education.

I hope to see additional amendments in favor of the children ages 1-5 before the new food package is approved. Thank you for your role in bringing about this change.

Sincerely,


West Chicago, IL 60185


received
AUG 15 2006

OS/LA-5

Sent: Monday, August 07, 2006 4:37 PM

To: WICHQ-SFPD

Subject: Reducing Media Exposure and Increasing Physical Activity

I am very enthusiastic regarding the new WIC Guidelines. In addition to putting as much emphasis on breastfeeding as possible please consider the following.

WIC presents a unique teaching and educational opportunity for your parents. Average screen times for video games and television are going up and have also been directly connected to the obesity crisis.

Providing information to young families to support their development of an effective home media strategy may be beneficial. Parents can start to plan their home and alter their own habits aiming at reducing television and media exposure to levels outlined by AAP. This education in addition to encouraging physical activity as the child grows and develops may be an effective addition to the nutritional guidance provided.

Please forgive the oversight if I have missed this in the material presented.

Keep up the great work!

Community Health Access Project
Ocie Hill Neighborhood Center
Mansfield, Ohio 44901

OS/LA -6

Sent: Thursday, August 24, 2006 3:04 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77

Good day!

I am writing to add a comment to the proposed rule for the new WIC food packages. In reading it over, I noted that Soy Milk is being considered an alternative to regular Milk as there is a need for this with many children. I work for the Cuyahoga County Board of Mental Retardation and Developmental Disabilities as a case worker. I have a family with a child who has severe food allergies that include wheat, milk and soy. Their only alternative is rice-based foods for much of the bulk and protein. It would be helpful if WIC had some flexibility with regards to what foods can be used as alternatives to milk. If there is a fear that it would be abused, reserve these authorizations only when a doctor has signed off on it, as I no doubt know this child's would.

I appreciate the time and effort in this.

Take care,

CCBMRDD

OS/LA-7

Sent: Tuesday, August 22, 2006 5:26 PM

To: WICHQ-SFPD

Subject: WIC Food Pkg

Hello:

1.. I am supportive of the changes proposed to the WIC food packages to make them consistent with recent medical and nutritional recommendations, flexible for special needs clients and supportive of breast feeding.

2.. I recommend that food package changes be made every 10 years based on the most recent medical and nutritional research, best practices and cultural needs of this population. Waiting 26 years to make changes to this program's food packages is not being a responsible public health program.

MCH Bureau, Health Services
SCDHEC

OS/LA-8

From: WebMaster@fns.usda.gov
Sent: Tuesday, August 29, 2006 9:49 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Clarksville
STATE: AR
ORGANIZATION: Clarksville Housing Authority
CATEGORY: Other
OtherCategory: Federal - Public Housing
Date: August 29, 2006
Time: 09:49:08 AM

COMMENTS:

Any program changes that reduces waste and promotes usage of healthy dietary items is very much appreciated. We have a small food bank for our tenants, and providing healthy food choices is extremely difficult in this time of budget cuts. I am so glad to hear that WIC will be making the proposed changes. Knowing that this target group will be supplemented with such good choices is very encouraging.

OS/LA-9

Sent: Thursday, August 31, 2006 8:31 AM

To: WICHQ-SFPD

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

I strongly support the changes in the WIC Food Package. Adding fruits and vegetables is especially important at a time when we are encouraging increased fruit and vegetable consumption through our food stamp nutrition education programs. Increasing the number of farm markets accepting WIC vouchers will also help increase access in many neighborhoods. Adding foods that acknowledge the diversity of the population is also important. This will make the food package more appealing and result in better health for WIC families.

I know the task of revising this food package was a challenging one and I applaud the work that was done and the result.

"Never Have an Ordinary Day®" (Pepperidge Farm)

Family & Consumer Sciences
MSU Extension
East Lansing, MI 48824

OCT 27 2006

10/23/06

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

~~XXXXXXXXXX~~
05/LA-10

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

Dear Ms. Daniels:

As Registered Dietitian for Tanana Chiefs Conference I support the USDA issued proposed rule governing the WIC Food Packages published in the Federal Register on August 7, 2006, as a move in the right direction.

I believe the revised regulations begin the needed steps that will improve the nutritional health of WIC participants. The revisions are science based and meet many established guidelines, i.e. *2005 Dietary Guidelines for Americans*, and infant feeding practice guidelines of the American Academy of Pediatrics; and making a change to allow greater package choices will allow cultural flexibility.

I fully support the changes recommended by the Institute of Medicine (IOM) of the National Academies as they prompt, "WIC to respond to changes in nutrition science, demographics, technology, and the emerging health concerns in the WIC community." As a health care provider for patients of chronic diseases: obesity, prediabetes, diabetes, hypertension, hypercholesterolemia, and high risk WIC Mother's I recognize that many early life purchase habits become lifetime patterns that can precipitate many of these chronic disease states in future years.

I agree with the following points:

1. "The proposed rule aims to support breastfeeding for the first six months and continued breastfeeding, with appropriate complementary foods, until the infant's first birthday. We *do not support* the recommendation to pilot test the food package for the partially breastfeeding woman. With a delay in implementation of this package, we believe that many women will simply choose to formula feed. We recommend that the fully breastfeeding, partially breastfeeding and fully formula feeding woman's food package changes be implemented concurrently."

2. "States should be given the option to provide the breastfeeding infant, in the first month, with 1). no formula, or 2). one can of powdered formula as recommended in the IOM Report. States would incorporate their option into their existing breastfeeding policies and procedures."

3. "The proposed rule provides for complementary infant food fruits and vegetables at six (6) months of age in varying amounts for those infants who are fully breastfeeding, partially breastfeeding or fully formula feeding as well as infant food meats for fully breastfeeding

infants. Children and women participants will also benefit from the addition of fruits and vegetables through "cash-value" vouchers to purchase fresh and processed fruits and vegetables in the proposed amounts of \$8 for women and \$6 for children. We urge that the dollar amount provided to the fully breastfeeding woman be increased to \$10 to match the IOM recommendation. This would provide further incentive and support for breastfeeding."

4. "The food package recommendations support scientific research findings, which suggest that increasing fruits and vegetables is associated with reduced risk for obesity and chronic diseases such as cancer, stroke, cardiovascular disease, and type 2 diabetes. Fruits and vegetables added to the diet also promote adequate intake of priority nutrients such as Vitamins A, C, folate, potassium and fiber."

5. "Dollar denomination of the fruit and vegetable cash-value vouchers and the minimum vendor stocking requirements for fruits and vegetables be determined at the discretion of the WIC State agencies.

State flexibility to promote produce selections that are locally accessible, culturally appropriate, affordable, and practical for various household situations - such as storage, preparation and cooking options - is paramount. Flexibility will give States the capability to partner with vendors to promote the maximum number and variety of produce items. Setting an arbitrary vendor stocking level at two as suggested in the proposed rule will not encourage State agencies or vendors to provide the wide variety of fruits and vegetables purchased by WIC consumers as demonstrated in the three highly successful pilot projects recently conducted in California and New York. It is essential that State agencies determine the dollar value of the cash-value vouchers in partnership with vendors to assure appropriate redemption levels and to save already tight Nutrition Services dollars. Printing of multiple voucher instruments in small denominations is costly and counter productive."

6. "The proposed rule to include whole grain bread and other grains for all children and pregnant and breastfeeding women is consistent with the *2005 Dietary Guidelines for Americans* which recommend that refined grains be replaced with whole grains. In order to accommodate the medical needs of certain participants, we support the IOM recommendation to allow States to make substitutions for "wheat-free" cereals based on a medical prescription and urge the Department to include such a provision in the final rule."

The food additions and reductions will all improve how nutritional goals are met while "preserving cost neutrality." Yet, I consider the suggested changes to be just the beginnings of a positive trend.

Additional Dietary intervention goals to improve health status can include:

1. Promote carb choices that deliver sustained glucose levels without rapid peaks:

a. Fruit and Grains that have 3 grams of fiber for 20g carb and have Glycemic index < 75.

- i. Proposed changes are move in this direction with required 51% whole grain in breakfast cereals and allowing option for purchase of other whole grains – can we provide incentive in this program to promote

purchase of whole rye, barley, and quinoa that have a lower Glycemic index than wheat, rice, or even oats?

- ii. Further reduction/elimination of fruit juice (non fiber quick carb) replaced with low sodium v-8 juice, a non-carb choice.
- iii. Note: Fiber reduces Glycemic index /blood sugar peaks, therefore forestalls appetite and maintains metabolism, assisting in reduction of obesity and related disease. The presence of fiber usually indicates the integrity of original 25 vitamins minerals and phyto nutrients.

b. Low fat dairy with good Omega balance.

- i. Yogurt option with active yogurt cultures improves digestibility in lactose intolerant populations.
- ii. Dairy from grass fed cows to provide good omega 6 to 3 ratio. Omega-3 decreases insulin resistance, decreases cholesterol formation (Corn fed animals have higher Omega -6 that competes with Omega-3 for receptor sights – promote legislation that reduce corn feeding).
- iii. Consider lower heat temp processed dairy, determine what type processing is least protein degenerative. High heat processed proteins are sources of Nepsilon-carboxymethyl-lysine an End Glycation Product – known to increase neuropathy in diabetic population. No sweetener or glucose rather than fructose sweetener is favorable to reduce these formations as well. Ex: Formula fed infants received these end products numbering approximately 4000 vs. breast fed babies about 45; Breastfed babies have reduced rates of obesity and diabetes; Breast-feeding is best. Implications about glycation end products are not clear yet it is know that these end products accumulate over a life time contributing to cellular damage and are continually being “repaired” with nutrients like thiamine.

2. Promote Proteins with good Omega balance and saturated fat <4g per 3oz serving:

- a. Addition of salmon, sardines and Light chunk tuna are excellent. Specify wild as farm raised fish will not carry same benefits.
- b. Further reduction/elimination of cheese is supported.
- c. Use a non-hydrogenated peanut butter.
- d. Increase use of beans as protein.
- e. Use of eggs as a healthy habit is now supported by Harvard Public Health and Duke Lipid Center – “cholesterol” found in the egg or on the food label is not the primary cause of increases in cholesterol as once proposed. High omega-3 eggs (100mg Omega-3) have been shown in a Canadian Study to improve Cholesterol total to HDL ratio if 2 a day are consumed.
- f. Cautionary note on soy use wide scale: Soy products bind and reduce free levels of Thyroid hormone T3 and T4 this can be problematic for persons with familial history of hypothyroid, one infant study shows babies with familial history of hypothyroid using soy formula had low T3 and T4.

3. Promote increased consumption of vegetables, half plate at each meal, particularly for participants with high BMI – veggies offer additional fiber, vitamins, and minerals with out the added calories and glucose peaks.

- a. Avoid grouping fruits and veggies together. They serve a different purpose. Potato, corn, peas, hard squash and fruit are carbohydrate and ½ cup can

provide 15g carbohydrate; Thus, they cannot be consumed limitlessly (>60g a meal) with out long-term health consequences.

- b. Fructose is metabolized in the liver and is converted to triglycerides, a preliminary/adjunct form of LDL/VLDL cholesterol. Therefore large amounts of fructose via high fructose corn syrup (can contain 2/3 more fructose than sugar) or fruit juice is not encouraged as a daily lifetime habit. Particularly in our native population, as triglyceride formation goes hand in hand with insulin resistance - already a prominent issue.

I am willing to assist in collaboration for successful program implementation. As a past WIC recipient and a current provider to WIC Mom's and children I can't say how much these changes will mean for our futures. Please help "USDA partner with State agencies and the National WIC Association to assure a reasonable and flexible implementation timeframe of at least one year from the date of publication of the final rule.

I enthusiastically and strongly support the proposed rule to minimize vendor stock requirements, reduce the administrative burden on States and local agencies, encourage the growth of Farmers' Markets, support participant choice, and most important, focus attention on chronic disease prevention and control."

The proposed food package changes will provide greater amounts of all of the priority nutrients currently identified as needed by the WIC population. They will supply a reliable and culturally acceptable source of supplemental nutritious foods as well as promote and support exclusive breastfeeding. Equally important, the proposals will provide WIC professionals with the necessary tools to reinforce the nutrition education messages and promote healthier food choices." When I tell moms with gestational diabetes what foods to shop for they will no longer be able to tell me: "I can't get that on WIC."

"WIC is our nation's premier public health nutrition program. 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.

We look forward to working closing with USDA to fully implement the proposed rule and urge finalization of the rule by no later than the spring of 2007."

Sincerely,

Chief Andrew Isaac Health Center
1408 19th Ave, Rm 394
Fairbanks, AK 99701

OS/LA-11

Docket ID # 0584-AD77, WIC Food Packages Rule

Sent: Monday, September 11, 2006 10:50 AM

To: WICHQ-SFPD

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

Dear USDA,

I applaud the proposed guidelines, Great job!!

Best Regards, ,

United Way of Palm Beach County

OS/LA-12

From: WebMaster@fns.usda.gov
Sent: Tuesday, September 12, 2006 6:10 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Taholah
STATE: Washington
ORGANIZATION: Quinault Housing Authority
CATEGORY:
OtherCategory:
Date: September 12, 2006
Time: 06:09:38 PM

COMMENTS:

I think that adding fresh or processed fruits and vegetables would be a great proposal. But I would have to disagree with reducing the formula, milk, eggs and juice, because there are families out there that are in great need of these items and the WIC program is very helpful to needy families. I now from experience that even though the WIC program provides a great amount of formula for the month but still I found myself spending up to \$100.00 per month after WIC. I know that milk, eggs and juice are one of the first things to go in my refrigerator, so I think that it would be great to add some new items to WIC but to eliminate some of the formula, milk, eggs, and juice just don't sound like that will satisfy any WIC client.

OS/LA-15

From:

Sent: Wednesday, September 13, 2006 5:25 PM

To: WICHQ-SFPD

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

Dear Patricia Daniels,

I would like to add my support to the proposed changes to the WIC food offerings. Not only are the food choices more nutritious but the freedom to shop at any participating provider has certainly made this a more user friendly program.

As a Case Coordinator for the CHDP program of Butte County, it brings referring clients to WIC in alignment with the recommendations for a balanced, low fat, highly nutritious diet that is recommended by CHDP.

Thanks you for the proposed changes.

OS/LA-16

From: WebMaster@fns.usda.gov
Sent: Monday, September 18, 2006 11:51 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: taholah
STATE: wa.
ORGANIZATION: quinault indian nation headstart
CATEGORY:
OtherCategory:
Date: September 18, 2006
Time: 11:50:38 AM

COMMENTS:

I think that fruits and vegetables are a great idea. With the increase of overweight children and adults the sooner you can get children to like fresh fruits and vegetables the better. There are also many vitamins and minerals in a variety of foods.

OS/LA-18

Sent: Friday, September 22, 2006 2:51 PM
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

I have read the “Special Supplemental Nutrition Program for Women, Infants and Children (WIC): Revisions in the WIC Food Packages” document and am writing on behalf of the REACH Detroit Partnership to express our support of the changes outlined in the proposed rule.

The REACH Detroit Partnership aims to reduce racial and ethnic disparities by providing a community driven approach to preventing type 2 diabetes and its complications among African Americans and Latinos residing in the eastside and southwest communities of Detroit, Michigan. Our target population includes pregnant and postpartum women who participate in interventions aimed at helping them to achieve recommended levels of pregnancy weight gain, postpartum weight reduction, healthy eating and physical activity during and after pregnancy, and normal anthropometric and metabolic profiles at 6 and 24 weeks postpartum. In addition, well-baby care is emphasized and the women are referred to the WIC program. The changes in the proposed rule would be in alignment with our project’s efforts to promote and support breastfeeding and the consumption of a wider variety of food, and to be cognizant of cultural food preferences when promoting healthy eating. Thank you.

REACH Detroit Partnership
Detroit, MI 48201-2654

10/16/06

OCT 16 2006

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

OS/LA-~~11/16/06~~ 19

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.... However, it is still heavily dairy-rich.

In addition, yogurt would be a welcome addition to the package which would assist in the dairy intake.

Baby food and juices for infants may not be a good choice. Firstly, baby food is marketed as so good for the baby and is overpriced for the nutritive value. Adult food that is pureed or mashed is both more economical and nutritional. Baby food producers profit enormously from their own market niche. We should be educating, not stimulating their profits.

Also, juices, as we all now know, are usually high in sugar and not as nutritional as fresh fruit in season.

These ideas may continue to be part of your thinking as further revisions and modifications become part of the oversight of this wonderful program for our country's most needy.

Sincerely,

OS/LA-22

Supporting WIC food change

Sent: Monday, October 02, 2006 3:00 PM

To: WICHQ-SFPD

Subject: Supporting WIC food change

I would like to voice my support for the proposed changes in the WIC program. I feel that adding more fresh fruits and vegetables will help support healthier eating habits for persons supported by WIC and will be especially good for the children, now and in the future. If we instill good eating habits of fresh fruits and veggies in these children, when they have children, these good eating habits can be passed on.

Johnson County Health Department
Olathe, KS 66061

OS/LA-23

Sent: Wednesday, October 04, 2006 5:21 PM

To: WICHQ-SFPD

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

I am writing in support of the proposed new WIC rules.

As someone who has been a nutrition educator through the FSNEP, and am now doing Food Stamp Outreach (no longer on the clock for that), I am very excited about the new proposal.

The most necessary food group, has also been the most passed on - vegetables. I would see family after family that just did not include vegetables in their diets (unless you count French fries, I don't). Our children eat broccoli, cauliflower, beets (yuck), peas (cooked yuck), edamame... by the plateful, because they were exposed to them from the get go. And though our son has hit a picky stage (he's 4) he still eats all of the things listed above plus pomegranates, kiwi's, melons of all sorts.... The best way to get kids to eat vegetables is to offer it while they are young, offer a variety of things, offer them regularly and don't impose your preconceived opinions on them.

The biggest reason that people give for not eating fruits and vegetables is that they can not afford it. WIC is a well received program, and making fruits and veggies available through it would be a great way to get families in the habit.

It would help fight the obesity problem in the US, and help out local farmers at the farmers' markets. WIC recipients that have access to a farmers' market would be able to get a good return on their WIC \$, and once at the market would most likely spend more to fill out their grocery needs.

I hope that you enact these changes, and continue the FMNP coupons as well. The FMNP brings people out to the market that may not come on a regular basis. Though I wouldn't mind a later date for their release, at least in this part of the country. The coupons are made available in July. Local produce is just getting up to speed at that time. By late August and Sept there is a much better selection of healthy vegetables.

thanks for your consideration

Livingston and Wyoming Counties
foodlink
Rochester, NY 14608

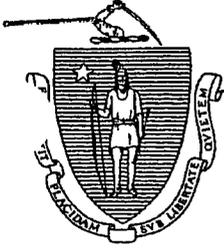
OS/LA-24

Sent: Thursday, October 05, 2006 1:33 PM
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Fairfield
STATE: CA
ORGANIZATION: Solano County H&SS
CATEGORY: Other
OtherCategory: County Agency
Date: October 05, 2006
Time: 01:32:30 PM

COMMENTS:

I stongly urge you to pass the proposed rule which will support the nutrition information that WIC is giving out.



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
Department of Agricultural Resources

Boston, MA 02114



MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

OCT 12 2006

ROBERT W. GOLLEDGE, JR.
Secretary

DOUGLAS P. GILLESPIE
Commissioner

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

OS/LA-27

October 11, 2006

Dear Ms. Daniels:

This letter provides comment on the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): revisions in the WIC Food Packages, Proposed Rule (7 CFR Part 246), on behalf of the Massachusetts Department of Agricultural Resources.

The Department commends USDA for the revisions to the WIC Food package and supports the inclusion of fruits and vegetables. With childhood and adult obesity on the rise, it is critical that more Americans eat additional fruits and vegetables to maintain a healthy lifestyle. Providing WIC participants with this added benefit will encourage additional consumption of these healthy and nutritious foods, thus impacting the health of women and children in the WIC Program while setting a course for healthier lifelong eating habits.

At the same time, we strongly encourage USDA to allow states the flexibility for local growers and farmers' markets to easily participate. The proposed rule allows states to authorize farmers at farmers' markets to accept WIC cash value food instruments for fruits and vegetables, provided such markets meet the vendor selection criteria specified at Sec. 246.12 (g) (3) and vendor agreement requirements outlined in Sec. 246.12 (h) (3). Burdensome requirements for farmers and farmers' markets will be an impediment to their participation.

We recommend that at states' option, farmers participating in the WIC FMNP be automatically accepted as a certified vendor for the WIC fruit and vegetable vouchers, and that this authorization be valid at any site where the farmer is currently authorized to accept FMNP food instruments.

Our experience with the WIC FMNP shows that WIC participants appreciate the taste and quality of locally grown produce. The impact of the program to farmers is also quite beneficial in keeping local farms in operation and supporting the development of farmers' markets in low-income neighborhoods.

We strongly urge USDA to consider the impact to small, local growers in setting forth appropriate policy and regulations where both WIC participants and farmers can benefit.

Sincerely,

Commissioner

OS/LA-32

From: WebMaster@fns.usda.gov
Sent: Saturday, August 12, 2006 1:55 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

CITY: Frankfort
STATE: KY
ORGANIZATION: KY Dept. of Ed, Nut. & Hlth Svcs AND USAR
CATEGORY: SASstaff
OtherCategory:
Date: August 12, 2006
Time: 01:55:26 PM

COMMENTS:

It's about darned time, if we're going to put out and profess the Dietary Guidelines it's about darned time one of our programs followed them, wish CACFP, NSLP & SFSP cared as much about nutrition as they do about finding Sponsors Seriously Deficient!



OCT 20 2006

Department of Health
St. Johnsbury District Office

St. Johnsbury, VT 05819-2638

[phone]
[fax]
[toll free]

Agency of Human Services

OS/VA-
37

20 October 2006

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

Dear Director Daniels:

As a Public Health Nutritionist serving individuals on WIC in Northeastern Vermont, I would like to express my delight at the prospect of revisions to the WIC food packages.

The inclusion of grain selections is very appropriate and makes sound dietary sense. However, I would like to see families given the option to forgo cereal in favor of other whole grains. This makes the food package more progressive and adaptable for two reasons. Firstly, many cultures do not typically consume breakfast cereals. Secondly, the whole grain selections are adaptable to any meal or culture. Breakfast cereals, with few exceptions, are appropriate only for breakfast, despite manufacturers' claims of versatility.

Canned fruit packed in juice or dried fruits should be an allowable alternative to juice. Clients should be permitted to choose up to half of the allotted juice ounces as canned or dried fruit.

Apparently the proposed revisions to the child's food package do not include a soy milk option. Soy selections should be available on the child's food package as well. Vegetarian families, families of Asian descent and others would find little utility in the revised children's package. We would in effect be short-circuiting a family's effort to raise a child as a vegetarian or adhere to cultural eating patterns. While I understand that the WIC packages need to be based on sound nutritional science, the fact remains that certain segments of our served population will not consume, or do not routinely consume dairy products. We are obliged to consider alternatives, regardless of external pressures.

Only milk and milk products from dairies that pledge (with documentation) that they do not administer recombinant- Bovine Somatotropin should be WIC eligible. No exceptions. This is important to the health of children and encourages sustainable dairy herd management.

I understand that the process of revision is an arduous one. In your deliberations I ask that you honor two considerations over any others - ¹⁾ sound nutrition ²⁾ choice. Though the WIC program is supplemental, it is the cornerstone of many families' diets. Please allow greater choice among high quality food items. Specifying standards for food manufacturers & producers with regard to quality and sustainability is also an obligation and due to the size of the program, would send a very pointed, influential message to the industry.

Thank you for your time.

Respectfully

District Supervisor
Vermont Department of Health - STJDO

OCT 23 2006

Elliot Schulman, MD, MPH *Director/ Health Officer*
Michael D. Harris *Deputy Director*
Michele Mickiewicz, MPH *Deputy Director*
Jane Overbaugh *Deputy Director*
Earl Lynch, MD, MPH *Medical Director*

October 19, 2006

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

os/LA-
41

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

Dear Ms. Daniels,

Thank you for the opportunity to provide comments on the USDA's proposed regulations that substantially revise the WIC Food Packages. On behalf of the **Santa Barbara County Public Health Department**, I am in strong support of these reforms as they will strengthen the WIC program's ability to improve the nutrition and health status of millions of families. It is important to move these changes forward into policy as quickly as possible. Please conduct the analysis on the proposed rule and work toward publishing a final rule as early in 2007 as possible.

I am also in support of getting increased access to fruits and vegetables to WIC clients. I strongly support the plan to adjust the other food voucher groups to allow for providing this access. In addition, 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 Institutes of Medicine recommended levels, and to keep pace with inflation.

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. 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,

Deputy Director – Administration
Public Health Department



the
Chickasaw
Nation HEADQUARTERS

Arlington at Mississippi / Box 1548 / Ada, OK 74821-1548 / (580) 436-2603

OCT 30 2006

Bill Anoatubby
Governor

Jefferson Keel
Lieutenant
Governor

October 31, 2006

05/LA
58

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:

The Chickasaw Nation Farmers' Market Nutrition Program is pleased to have the opportunity to comment on the revisions in the WIC Food Packages, Proposed Rule (7 CFR Part 246), set forth by USDA. USDA is to be commended on this long awaited revision of the WIC food package to include fruits and vegetables. Having reviewed the proposed rule, we provide the following comments pertaining to the Food Delivery Systems section (246.12) of the regulations.

The Chickasaw Nation Farmers' Market Nutrition Programs have been delivering fresh fruits and vegetables to WIC families for twelve years and have seen the benefits in our WIC population. We are pleased that we have been a positive force in this effort and will continue to cultivate new opportunities for consumers to buy fresh produce from local growers.

Our comments are based on two major concerns. One is that small and local growers have the opportunity to easily participate in federal programs. The second is that states have as much flexibility as possible to make the implementation simple and cost effective. We make three recommendations on behalf of the the Chickasaw Nation Farmers' Market Nutrition Programs:

Vendor Authorization

Farmers/farmstands/and/or farmers' markets participating in the WIC FMNP should automatically be eligible as an authorized farmer/farmstand/and/or farmers' market to accept WIC fruit and vegetable vouchers. This could be labeled as an adjunct eligibility or special dispensation under current rule. WIC routing numbers and FMNP vendor numbers could be adjusted to avoid duplications.

Rationale: USDA's farmers' market promotion efforts have been excellent and we urge FNS to maximize opportunities for small, local growers to participate in all



God Bless America!

federal nutrition programs. Since they are only able to produce seasonally and are limited to fresh fruits and vegetables that they grow, excessive vendor eligibility requirements would be cumbersome and discourage participation. This would also alleviate vendor administrative costs and utilize existing FMNP structure and personnel for vendor signup and compliance. The FMNP's have a history of program integrity and expertise in vendor compliance.

Voucher Denomination

The Chickasaw Nation FMNPs recommends that States have the option to determine the WIC fruit and vegetable food instrument denominations.

Rationale: Years of experience have enabled FMNP agencies to determine the denominations that work best for their areas and seasons. Some have found that smaller denominations are cost effective and improve redemption rates, while larger denominations achieve those objectives better in other states.

Voucher Redemption Process

The Chickasaw Nation FMNPs recommends that states operating the FMNP be allowed to apply their FMNP food instrument redemption procedures to the redemption of WIC fruit and vegetable vouchers at farmers markets.

Rationale: Federal policy now encourages state agencies to align policies and procedures for more efficient administration of federal programs by states (e.g., Food Stamps, Medicaid, TANF). Similarly, states should be permitted to align their FMNP and WIC redemption procedures at FMNP redemption sites, such as latitude in requirements for recipient identification or signatures on vouchers. Alignment of FMNP and WIC fruit and vegetable voucher redemption rules would reduce administrative costs and make the process more understandable and efficient for participating farmers and markets as well as for WIC participants.

We look forward to the implementation of the new WIC Food Package at the earliest possible opportunity. If more information is needed, please contact me at (580) 436-7292.

Sincerely,



Jennifer Hayes, Manager
Nutrition Services
The Chickasaw Nation



Maryland Department of Agriculture

Office of the Secretary

Robert L. Ehrlich, Jr., Governor
Michael S. Steele, Lt. Governor
Lewis R. Riley, Secretary
John R. Brooks, D.V.M., Deputy Secretary

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October 30, 2006

OS/LA-59

Ms. 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:

We have some concerns about the proposed revision to the WIC Food Package (7 CFR Part 246). Naturally, we favor the consumption of more "fresh" fruits and vegetables by all Americans, but we are deeply concerned about the effects of the revision on an existing very successful USDA program, the Farmers' Market Nutrition Program. "The dual purposes of the Farmers' Market Nutrition Program (FMNP) are a) To provide resources in the form of fresh, nutritious, unprepared foods (fruits and vegetables) from farmers' markets to women, infants, and children who are nutritionally at risk and are participating in the Special Nutrition Program for Women, Infants and Children (WIC) or are on the waiting list for the WIC Program; and b) To expand the awareness, use of and sales at farmers' markets."

While the proposed changes seem very simple, the outcomes would have far reaching consequences. This change could be very detrimental to the FMNP and farm income. In Maryland, over 250 farm families depend on the income from the FMNP. If WIC participants are allowed to purchase produce at grocery stores, they may elect not to make the extra trip to a farmers' market. Farmers' markets provide their customers with produce that is at its highest nutritional value, usually picked the morning of the market or the evening before. Farmers serve as added resources to the WIC clients, who often ask about food preparation and storage. Farmers' markets provide consumers with a pleasant shopping environment and the opportunity for interaction between farmers, friends, and neighbors, thus building a sense of shared community. The Maryland Department of Agriculture has established several farmers' markets in low income areas with the specific purpose to serve WIC and low income senior participants.

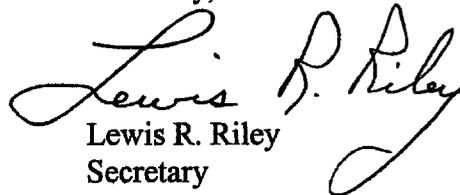
Produce available at Maryland's grocery stores is usually not Maryland grown but shipped in from California and Florida. A 1997 study found that "fresh" produce arriving in Jessup, Maryland (Maryland Food Center Authority) traveled an average one-way distance of 1,686 miles from state of production to Maryland. Since produce begins to decrease in nutritional value as soon as it is picked, the proposed change will not be providing the WIC participants with optimum nutritional values.

Ms. Patricia N. Daniels
October 30, 2006
Page Two

In addition, the proposed rule seems to represent a change in policy toward U.S. Agriculture. Maryland's current WIC food package authorizes foods which are produced or manufactured in the United States. Many "fresh" fruits and vegetables are imported.

I appreciate this opportunity to present the impact this revision would have for Maryland's farmers and would be happy to discuss the issues further. I can be reached at 410-841-5880.

Sincerely,


Lewis R. Riley
Secretary

cc: Pat McMillan, Maryland Department of Agriculture (MDA) Assistant Secretary,
Office of Marketing, Animal Industries & Consumer Services
Mark Powell, MDA Chief, Marketing and Agricultural Development
Jane Storrs, MDA Agribusiness & National Marketing Administrator
Joan Schulz, MDA FMNP Administrator

OCT 31 2006

Duane Kromm

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October 30, 2006

OS/LA-62

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 to revise the WIC Food Packages. On behalf of Solano County residents, 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.

Solano County 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.

I strongly support providing 8.2 million WIC mothers and young children with cash-value vouchers to purchase fruits and vegetables, as recommended by the Institute of Medicine's (IOM) Report: "WIC Food Packages: Time for a Change." While the IOM recommended \$10/ and \$8/month vouchers, the proposed rule reduced this amount to \$8/ and \$6/month in order to achieve overall cost neutrality. I urge USDA to work with Congress to secure increased federal funding in future years to bring the cash value of these fruit and vegetable vouchers up to the IOM-recommended levels, and to keep pace with inflation. This will better assist WIC families to purchase and consume fruits or vegetables each day. However, the proposed voucher levels are an excellent start and should be immediately implemented

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

- The proposal will provide stronger incentives for continued breastfeeding by providing less formula to partially breastfed infants and providing additional quantities/types of food for breastfeeding mothers. To further enhance the food package for fully breastfeeding women, I urge USDA to raise the cash-value vouchers for fruits and vegetables to the original IOM-recommended amount of \$10 per month.
- The proposal to reduce juice and replace it with infant food at 6 months will support recommendations by the American Academy of Pediatrics for introducing infants to fruits and vegetables at the appropriate age.
- The provision of whole grain and soy options will allow WIC to better serve California'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.

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,



Duane Kromm
Solano County Supervisor, District #3



OCT 31 2006



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October 30, 2006

Via Email and U.S. Postal Service

OS/LA-65

Patricia N. Daniels
Director
Supplemental Food Programs Division
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, Virginia 22302
Email: WICHQ-SFPD@fns.usda.gov

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

Dear Ms. Daniels:

The Florida Department of Citrus is pleased to provide its comments on the Food and Nutrition Service's proposed revisions to the Food Packages of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC).

The Florida Department of Citrus ("FDOC"), headquartered in Lakeland, Florida, is an executive agency of the State of Florida that has been in existence since 1935. The major agricultural crops of Florida are citrus products, and FDOC is charged with regulating and marketing citrus fruit and citrus processed products from Florida.

SUMMARY OF FDOC'S POSITION

The Florida Department of Citrus believes that orange and grapefruit juices are a convenient and superior source of vitamin C and other valuable nutrients that are nutritionally beneficial to women and children. As such, USDA should either (a) maintain the fruit juice level currently in WIC Food Packages, or (b) restrict the fruit juice allowance in WIC packages to include only fruit juices that naturally provide beneficial nutrients at significant levels. The rationale for FDOC's position is set forth below.

ORANGE AND GRAPEFRUIT JUICES ARE EXCELLENT NATURAL SOURCES OF VITAMIN C

Vitamin C has been identified by the Institute of Medicine (IOM) as a "high" priority nutrient whose dietary intake is "inadequate" in pregnant, breastfeeding, and non-breastfeeding

postpartum women.¹ Current WIC Food Packages contain allowances for 100% fruit juice with “high vitamin C content” (i.e., that contain at least 30 mg of vitamin C per 100 milliliters, equivalent to 72 mg of vitamin C per eight ounces or 120% of the daily reference value). Both orange and grapefruit juices are excellent natural sources of Vitamin C.² Since vitamin C intake has been identified as a priority nutrient whose intake is low, we strongly urge USDA not to reduce the level of juice in the WIC Food Packages for these populations (Food Packages V, VI, and VII).

*ORANGE AND GRAPEFRUIT JUICES
PROVIDE OTHER BENEFICIAL NUTRIENTS*

In addition to vitamin C, orange and grapefruit juices also naturally provide other beneficial nutrients necessary to good health, including folate, potassium, thiamin, magnesium and important phytonutrients such as the flavonoids hesperidin³ and naringin.⁴ Since orange and grapefruit juices provide so many healthful dietary components to WIC program participants, we urge USDA to retain current levels of fruit juice in WIC Food Packages. Orange and grapefruit juice consumption is consistent with the WIC program’s objective of encouraging overall improvement in nutrient consumption.

As an alternative to maintaining the current level of fruit juice in the WIC Food Packages, FDOC recommends restricting the fruit juice allocation to only those fruit juices that naturally provide other valuable nutrients at substantial levels. The table below presents the nutritional content (in terms of percent Daily Reference Value) of eight ounces of orange, grapefruit, apple, and grape juice.⁵

¹ 71 Fed. Reg. 44784, 44825, at Table 1 (August 7, 2006).

² For example, one eight ounce glass of orange juice provides 120 percent of the daily value of vitamin C, while an eight ounce glass of grapefruit juice provides 100 percent of the daily value (before fortification to meet the high vitamin C content requirements of the WIC program).

³ Peterson, J. *et al.* “Flavanones in oranges, tangerines (mandarins), tangors, and tangelos: a compilation and review of the data from the analytical literature.” *J. Food Comp. Anal.* 2006; 19: S66-S73, at p. S70.

⁴ Peterson, J. *et al.* “Flavanones in grapefruit, lemons, and limes: A compilation and review of the data from the analytical literature.” *J. Food Comp. Anal.* 2006; 19: S74-S80, at p. S77.

⁵ Nutrient data for orange and grapefruit juice obtained from FDOC (www.floridajuice.com); nutrient data for apple and grape juice obtained from USDA National Nutrient Database for Standard Reference (www.nal.usda.gov/fnic/foudcomp/search/).

Juice	Calories	Folate	Thiamin	Potassium	Magnesium
Orange	110	15%	15%	13%	6%
Grapefruit	90	6%	10%	9%	6%
Apple	120	0%	2%	8%	2%
Grape	150	<1%	3.5%	10%	6%

Further information regarding the nutritional content of various fruit juices may be obtained by comparing their nutrient density using a methodology published in the American Journal of Clinical Nutrition.⁶ An analysis of the nutrient content of the following unfortified juices was conducted using this methodology, and yielded the following mean nutrient density scores:⁷

- (a) orange juice: 297
- (b) pink grapefruit juice: 322
- (c) white grapefruit juice: 237
- (d) apple juice: 28
- (e) grape juice: 30.

Clearly, orange and grapefruit juices are superior to apple juice and grape juice as natural sources of beneficial nutrients.

*ORANGE AND GRAPEFRUIT JUICES
PROVIDE A CONVENIENT FORM OF THESE NUTRIENTS*

Finally, it is important to remember that healthful foods are not beneficial unless they are actually consumed. Orange and grapefruit juices are a year-round, easy-to-consume, convenient food that provides vitamin C, folate, potassium, thiamin, and other nutrients. Everyone, from pregnant women to even the youngest of children, can easily drink these juices.

If fruit juice is replaced in the WIC Food Packages with whole fruits, it is reasonable to expect WIC participants to consume more of the fruits that they already purchase and consume.

⁶ Drewnowski, A. "Concept of a Nutritious Food: Toward a Nutrient Density Score." *Am. J. Clin. Nutr.* 2005; 82: 721-732.

⁷ "A comparison of nutrient density scores for select 100 percent fruit juices;" Gail C. Rampersaud, MS, RD, Assistant in Nutrition Research and Education, Institute of Food and Agricultural Sciences, University of Florida; presented at the 2006 Annual Meeting of Institute of Food Technologists, Orlando, Florida; Session: 057-03; June 27, 2006.

Sales data indicate that apples and bananas have been the most popular fruits by far for many, many years, followed by watermelon.⁸ Although IOM is correct when they state that fruit juice does not provide nutritional benefit beyond that available from whole fruit,⁹ the statement quickly loses validity if WIC participants replace high vitamin C content juices in their diets with popular fruits such as apples. For example, a person would have to consume at least 7 large apples to get the same amount of vitamin C as in one eight ounce glass of orange juice. Clearly, if the fruit juice content of WIC Food Packages is reduced or eliminated, the program participants' intake of vitamin C and other important nutrients designated by IOM as "high priority" is likely to suffer.

Finally, USDA has properly placed a priority on convenience and ease of consumption by including canned beans in the proposed rule, even though canned beans are more expensive than dried beans.¹⁰ Since orange and grapefruit juices are a convenient form of food that naturally provides vitamin C, folate, potassium, thiamin and other beneficial nutrients, USDA should maintain the current level of fruit juice in the WIC Food Packages, or in the alternative, should restrict the juice allotment to nutritionally superior juices such as orange and grapefruit juices.

CONCLUSION

The Florida Department of Citrus supports USDA's work to improve the content of WIC Food Packages to better meet the dietary needs of the program participants. Toward that end, however, FDOC believes that orange and grapefruit juice intake should be encouraged, rather than limited. As such, FDOC requests that USDA either (a) retain current levels of fruit juice in the WIC Food Packages, or (b) if reduction in fruit juice levels is necessary to maintain cost neutrality, the fruit juice portion of the Food Packages should be restricted to the more nutrient-dense juices.

Respectfully submitted,



Kenneth O. Keck
Executive Director

⁸ USDA Economic Research Service, 2004.

⁹ 71 Fed. Reg. at 44828; *also see* "WIC Food Packages: Time for a Change," Report of the Institute of Medicine of the National Academies, as commissioned in September 2003 by USDA's Food and Nutrition Service, p. 103.

¹⁰ 71 Fed. Reg. at 44837.



Cooperative Extension Service, Rock County

Nutrition Education Program
3303 Beloit Mall, Beloit, Wisconsin 53511
E-mail: mary.krisco@ces.uwex.edu

Time for Parents
Home Visitation Program
Phone (608) 363-6272 Fax (608) 363-6225

Oct. 31, 2006

NOV - 1 2006

OS/CA-68

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 express my support for the proposed rule to change the Special Supplemental Nutrition Program for Women, Infants and Children food packages. I am a county coordinator of the USDA's Food Stamp Nutrition Education Program (FSNEP) in Wisconsin; the health and well-being of the nation's women, infants, and children is a priority of FSNEP educators. The proposed changes will greatly benefit vulnerable mothers and children.

I'm pleased that the proposed rule reflects the science-based recommendations of the Institute of Medicine published in their April 2005 report, *WIC Food Packages: Time for a Change*. The proposed changes are also consistent with the *2005 Dietary Guidelines for Americans*. I am especially pleased that the WIC Program may be ceasing the practice of offering whole milk to WIC participants older than age 2. I worked as a WIC nutritionist myself for 10 years, and I remember how difficult it was to persuade people that they wouldn't be losing any vitamins or nutrients by switching to low-fat milk.

However, I don't think it's a good idea to withhold formula from breastfeeding mothers during the first month postpartum. The theory is sound—breastfeeding mothers should *not* be using formula if they wish to succeed with breastfeeding. In practice, though, this rule would only encourage more mothers to declare themselves “non-breastfeeding.” Most new mothers do not intend to breastfeed for an entire year. Many breastfeeding mothers I used to counsel would tell me that they wanted formula in the first month so that they could save it for later, when they weaned the baby from the breast. By withholding formula during the first month, we would be forcing mothers to declare themselves “non-breastfeeding” so that they could protect themselves from the insecurity of not having formula when it may be needed later.

Wisconsin Nutrition Education Program · Family Living Programs · Cooperative Extension

The Wisconsin Nutrition Education Program (WNEP) and the Time for Parents Home Visitation Program in Rock County are supported by the USDA Food Stamp Program and Expanded Food and Nutrition Education Program, UW-Extension Family Living Program, FoodShare Wisconsin, Rock County Human Services, and local partners. UW-Extension provides equal opportunities in employment and programming, including Title IX and ADA. To attend a class or receive a visit from a nutrition educator in Rock County, call WNEP at 608-363-6272. Relay 711. To find more about FoodShare and food assistance in Rock County, call 608-741-3488.



Cooperative Extension Service, Rock County

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Time for Parents
Home Visitation Program
Phone (608) 363-6272 Fax (608) 363-6225

Why not give a positive incentive for breastfeeding, like increasing to \$10 the cash-value of vouchers for fruits and vegetables for fully breastfeeding women? Or, better yet, why not provide fully breastfeeding mothers with the services of a professional lactation consultant and/or a voucher to rent a breast pump? The WIC Program will never become a major support for breastfeeding mothers until it makes a commitment to spending more on breastfeeding services than on formula.

Overall, I think the proposed changes to the WIC Food Packages are excellent. I urge publication of a final rule by the spring of 2007 to assure timely implementation of the rule's changes.

Sincerely,

Mary Krisco, MS, RD
Wisconsin Nutrition Education Program Coordinator, Rock County

Wisconsin Nutrition Education Program · Family Living Programs · Cooperative Extension

The Wisconsin Nutrition Education Program (WNEP) and the Time for Parents Home Visitation Program in Rock County are supported by the USDA Food Stamp Program and Expanded Food and Nutrition Education Program, UW-Extension Family Living Program, FoodShare Wisconsin, Rock County Human Services, and local partners. UW-Extension provides equal opportunities in employment and programming, including Title IX and ADA. To attend a class or receive a visit from a nutrition educator in Rock County, call WNEP at 608-363-6272. Relay 711. To find more about FoodShare and food assistance in Rock County, call 608-741-3488.

NOV - 3 2006

November 1, 2006

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

OS/CA-70

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

Dear Ms. Daniels:

As a member of the **Massachusetts Nutrition Board**, I strongly and enthusiastically support the USDA issued proposed rule governing the WIC Food Packages published in the Federal Register on August 7, 2006. The Board is a state advisory board that is a resource on matters related to the nutritional status of citizens in the Commonwealth of Massachusetts. The Board is comprised of leaders in the field of food, nutrition and health and influential members of their community who serve as advocates on issues of food and nutrition.

The proposed regulations improve the nutritional health of all WIC participants and are grounded in sound science, align with the *2005 Dietary Guidelines for Americans*, support the current infant feeding practice guidelines of the American Academy of Pediatrics, and support the establishment of successful long-term breastfeeding. The proposed food packages provide WIC participants with a wider variety of food choices, allow state agencies greater flexibility in offering food packages that accommodate participants' cultural food preferences, and address the nutritional needs of our nation's most vulnerable women, infants and children.

The proposed rule reflects recommendations made by the Institute of Medicine (IOM) of the National Academies in its report, "WIC Food Packages: Time for a Change." It follows the advice of the Institute, which stated that the WIC Program needs to respond to changes in nutrition science, demographics, technology, and the emerging health concerns in the WIC community. The changes in the proposed rule are consistent with nutrition education promoting healthier lifestyles and food selections to reduce the risk for chronic diseases and to improve the overall health of WIC's diverse population. The Department's aim is to add new foods while preserving cost neutrality—to cover the cost of the new foods, the proposed adjustments to juice, eggs and milk are highly acceptable. We believe that WIC clients will be pleased that there will be more choices in the foods offered.

The **Massachusetts Nutrition Board** has the following recommendations regarding the proposed rule.

Breastfeeding

The proposed rule aims to support breastfeeding, with appropriate complementary foods after the first six months, until the infant's first birthday.

- *We do not support* the recommendation to pilot test the food package for the partially breastfeeding woman. With a delay in implementation of the partially breastfeeding package, we believe that many women will simply choose to formula feed in order to benefit from the changes to the new fully formula feeding package. We recommend that the fully breastfeeding, partially breastfeeding and fully formula feeding woman's food package changes be implemented concurrently.
- We urge that the dollar amount for fruits and vegetables provided to the fully breastfeeding woman be increased to \$10, matching the IOM recommendation, for at least the first six months post partum. This would provide stronger incentive and support for breastfeeding in the period of time prior to the addition of complementary foods for fully breastfeeding infants at six months. If the USDA is unable to match the IOM recommendations for this group of women for this six month period, they should, at a minimum, allow States to act within the limits of their food funding to exceed the current maximum dollar amount for the fruits and vegetables vouchers for women within the first six months of breastfeeding.
- We would also suggest that States be given the option to provide the breastfeeding infant, in the first month, with 1) no formula, or 2) one can of powdered formula as recommended by the IOM. States would incorporate their option into their existing breastfeeding policies and procedures. An evaluation of the impact of these options on a mother's breastfeeding status will also allow USDA to determine an appropriate future course of action.
- State agencies will also require additional resources to provide enhanced breastfeeding support, peer counseling services and pumps to participants in order to ensure that WIC mothers feel comfortable foregoing formula within the first month and thereafter to help ensure breastfeeding success and optimal nutrition for their infants. WIC is the only national program that provides this level of breastfeeding education and support to the WIC population and must ensure that these changes to promote breastfeeding do not have the converse effect because mothers are afraid to give up all WIC formula benefits.

Fruits and Vegetables

The proposed rule provides for complementary infant food fruits and vegetables at six (6) months of age in varying amounts for those infants who are fully breastfeeding, partially breastfeeding or fully formula feeding as well as infant food meats for fully breastfeeding infants. Children and women participants will also benefit from the addition of fruits and vegetables through "cash-value" vouchers to purchase fresh and processed fruits and vegetables in the proposed amounts of \$8 for women and \$6 for children.

The food package recommendations support scientific research findings, which suggest that increasing fruits and vegetables is associated with reduced risk for obesity and chronic diseases such as cancer, stroke, cardiovascular disease, and type 2 diabetes. Fruits and vegetables added to the diet also promote adequate intake of priority nutrients such as Vitamins A, C, folate, potassium and fiber.

- In addition to the recommendation to increase the dollar amount of cash-value food instruments for fruits and vegetables to \$10 for fully breastfeeding women for a minimum of the first six months post partum, USDA should act to allow for full implementation of the IOM recommendation of \$10 cash-value instruments for all women and \$8 for children. To implement this recommendation while maintaining cost neutrality, States should have the option to:
 - Omit juice from the food packages for all children, a cost-saving measure that the medical and dental communities would fully support.
 - Reduce the amount of whole grains a child receives to one loaf of bread or one pound of a whole grain substitute to make the children's food package consistent with women's and still maintain current dietary guidelines.

Cutting corners with the fruit and vegetable cash-value instruments will lead to reduced health benefits for WIC mothers and children. WIC's success has been in saving long-term healthcare costs. Making this modest investment will assure healthcare savings in the future.

Soy Products

The proposed food packages offer calcium-set tofu as well as calcium- and vitamin D-rich soy beverages as partial substitutions and alternatives for milk. These alternatives will prove to be particularly beneficial to those WIC participants who suffer the medical consequences of milk protein allergy, lactose maldigestion, and those with cultural preferences.

- Currently, there are no calcium-fortified soy-based beverages on the market that meet the proposed protein and potassium standards. We urge FDA- and industry-standard levels of 6.25 grams of protein and 250 milligrams of potassium per 8 ounce serving as alternative minimum standards in order for the WIC food packages for women and children to be able to include soy.
- The **Massachusetts Nutrition Board** recommends that children be able to receive soy products without the requirement of medical documentation. The consumption of soy beverages and tofu for children can be a cultural/personal preference as well as a medical necessity. Since State policies and procedures for services and follow-up to medically diagnosed conditions will continue to be in place, this proposed rule will place an undue burden on the medical community and WIC service delivery systems and delay access to an important calcium source for WIC children.

Whole Grains

The proposed rule's establishment of a 51% whole grain requirement for breakfast cereals and inclusion of whole grain bread and other grains for all children and pregnant and breastfeeding women is consistent with the *2005 Dietary Guidelines for Americans* which recommend that refined grains be replaced with whole grains.

- The **Massachusetts Nutrition Board** recommends that USDA increase the allowable amount of whole grain bread from 16 ounces to one loaf up to 24 ounces, an amount consistent with the sizes available in stores.
- In order to accommodate the medical needs of certain participants, we support the IOM recommendation to allow States to make substitutions for "wheat-free" and "gluten-free" cereals based on a medical prescription and urge the Department to include such a provision in the final rule.

Vendor Regulations

- The **Massachusetts Nutrition Board** recommends that the USDA allow States to utilize existing Farmers' Market Nutrition Program vendor certification procedures for authorizing Farmers' Markets to participate in the WIC fruit and vegetable cash-value voucher program. The Board supports utilizing the existing FMNP structure and personnel for vendor authorization and compliance. Taking advantage of FMNP resources would greatly reduce the administrative burden on State WIC agencies and maximize the opportunities for small, local growers to participate in the WIC program. Without these changes, the proposed rule requirements would make the participation of farmers impossible to implement.

Voucher Redemption

- The **Massachusetts Nutrition Board** recommends that USDA give State agencies the discretion to determine the dollar denomination of the fruit and vegetable cash-value vouchers. It is essential that State agencies determine the dollar value of the cash-value vouchers in partnership with vendors to assure appropriate redemption levels and to save already tight Nutrition Services dollars. Printing of multiple vouchers in small, two-dollar denominations is costly and counter productive.
- USDA must give State agencies the flexibility to work with existing WIC vendors and the FMNP to develop and implement effective food instrument redemption procedures for fruits and vegetables cash-value vouchers that minimize administrative costs, processing errors, and are responsive to current WIC vendor and FMNP systems.

Categorical Tailoring and Substitution Requests

- The **Massachusetts Nutrition Board** is opposed to the removal of the State option to categorically tailor or propose food substitutions. There are rapid changes in food industry, science, demographics and other factors in today's environment, and State agencies may need to submit proposals for cultural accommodations or categorical

tailoring in the future. USDA's history of regulatory review and revisions to the WIC food packages substantiates the critical need for this flexibility. It is essential that States be allowed the ability to revise food lists to keep pace with the needs of their participants.

Implementation

The **Massachusetts Nutrition Board** recognizes that implementing the proposed rule will require good planning and effective communication. There is great excitement and anticipation within Massachusetts regarding the promulgation of a final rule revising the WIC food packages. We are looking forward to full implementation the proposed rule in an expeditious manner. We recommend that USDA partner with State agencies and the National WIC Association to assure a reasonable and flexible implementation timeframe from the date of publication of the final rule.

In closing, as a member of the **Massachusetts Nutrition Board** and in support of the Board's positions, I enthusiastically and strongly support the proposed rule with the above noted recommendations. I am convinced that it will support participant choice and focus attention on chronic disease prevention and control. The proposed food packages will provide greater amounts of all of the priority nutrients currently identified as needed by the WIC population. They will supply a reliable and culturally acceptable source of supplemental nutritious foods as well as promote and support breastfeeding. Equally important, the proposals will provide WIC professionals with the necessary tools to reinforce the nutrition education messages and promote healthier food choices. In addition, the outlined recommendations will serve to reduce the administrative burden on States and local agencies and encourage the growth of Farmers' Markets.

WIC is this nation's premier public health nutrition program. 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.

I look forward to the full implementation the proposed rule and urge finalization of the rule by no later than the spring of 2007.

Sincerely,



David Webber
Member, MA Nutrition Board



NOV - 3 2006

Shasta County

PUBLIC HEALTH

"BUILDING A HEALTHIER COMMUNITY"
www.shastapublichealth.net

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November 2, 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

OS / LA-71

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

Dear Ms. Daniels,

Thank you for the opportunity to provide comments on the USDA's proposed regulations that substantially revise the WIC Food Packages. On behalf of Shasta County Public Health, which provides county-wide WIC services to over 5,000 families per month, I am pleased to support these package reforms, which will help improve the nutritional intake of our clients. I commend the Department for proposing that the WIC program is consistent with the *2005 Dietary Guidelines for Americans* and 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 health status of millions of families.

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. WIC families should not have to wait any longer for better WIC foods; they have waited over 32 years! Once implementation is authorized, I urge the USDA to allow states latitude in implementing these sweeping changes so they are efficient and cost-effective for local agencies, grocers and participants.

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." And even though the IOM recommendation of monthly vouchers was reduced from \$10 and \$8/month to \$8 and \$6/month to achieve overall cost neutrality, the proposed voucher levels are an excellent start and should be immediately implemented. I would 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.

Additionally, I would encourage the continuance of the successful WIC Farmer's Market program, and consider allowing these vouchers to be used at farmer's markets as well.

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. This component of 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. Likewise, 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 recommendations.

The provision of whole grain and soy options will allow WIC to better serve California's diverse young families. I urge you to remove the physician order requirement now attached to the soy food options. This is an unnecessary barrier for our vegetarian clients. If you feel the need to maintain some medical oversight, I suggest you assign this responsibility to the Registered Dietitians that work within the local WIC programs.

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. I urge you to take this bold move to improve the health of women, infants and children in California and across the nation.

Sincerely,



Donnell Ewert, MPH
Acting Director
Shasta County Public Health



NOV - 3 2006



November 3, 2006

Patricia Daniels, Director
United States Department of Agriculture
Food and Nutrition Service
Supplemental Food Programs Division
3101 Park Center Drive, Room 520
Alexandria, VA 22302

05/LA-72

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

Dear Ms. Daniels:

We are writing to express the support of the California Health and Human Services Agency (CHHSA) and the California Department of Food and Agriculture (CDFA) for the proposed rule to change the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) food packages. The health and well-being of California's women, infants, and children is a priority for CHHSA and CDFA, and these changes will greatly benefit this vulnerable population.

We are pleased that the Proposed Rule closely reflects the science-based recommendations of the Institute of Medicine published in their April 2005 report entitled *WIC Food Packages: Time for a Change*. The proposed changes are also consistent with the 2005 Dietary Guidelines for Americans and national nutrition guidance including those from the American Academy of Pediatrics (AAP).

The proposed rule is a significant step forward in improving the overall health of WIC mothers and children. In particular, the addition of fruits, vegetables and whole grains will contribute to the reduction in obesity and other diet-related chronic diseases such as cancer, stroke, cardiovascular disease and type II diabetes. We also 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, personal preference, and the cultural diversity in California.

Ms. Patricia Daniels
Page 2
November 3, 2006

We commend the U.S. Department of Agriculture's (USDA) proposed changes which provide stronger incentives to initiate and continue breastfeeding by providing less formula for partially breastfed infants and offering additional quantities and types of foods for breastfeeding mothers and their infants. In addition, we support the proposed policies for all infants which would delay the introduction of solids, provide infant food fruits and vegetables, and eliminate juice from their food package as recommended by the AAP.

Finally, we are enthusiastic about the possibility of allowing our participants to use their fruit and vegetable cash-value vouchers at Farmers' Markets as well as grocery stores. This is a very attractive option for an agricultural state such as California where Farmers' Markets are available statewide and year round. However, to make this a viable option, we urge USDA to modify the proposed rule criteria regarding the requirements for Farmers' Market participation to model the highly successful Farmers' Market Nutrition Program.

We strongly believe that these changes will give WIC the tools to reinforce nutrition education efforts to promote healthier food choices. They will enable mothers and caregivers to establish long-term healthy dietary patterns for their children and families.

The CHHSA and CDFA applaud USDA's efforts to bring the WIC food packages in alignment with the most current nutritional science while meeting the needs of the culturally diverse population we serve. We urge USDA to move the proposed food package rule forward expeditiously and adopt a final rule by the spring of 2007.

Sincerely,



Kimberly Belshé, Secretary
California Health & Human Services Agency



A.G. Kawamura, Secretary
California Department of Food and Agriculture

NOV - 3 2006

November 2, 2006

To Whom It May Concern,

This letter is being written by the Middlesex County Board of Agriculture, on behalf of the produce growers of Middlesex County, as well as those throughout the state of New Jersey.

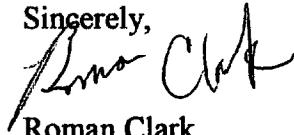
The WIC Nutrition Program has been an asset to our local produce growers for the past few years. Although many of our growers sell their produce through a "home" market, there are a number of them who must also depend on Farmer's Market sales to keep their businesses viable. Our farmers have continually expressed the importance of the WIC Program, to both the consumer, and to the success of the small family farm.

It has come to our attention that the WIC Program is under review and a change in WIC acceptance is being considered. The WIC Program has been a blessing to many of our farmers. In more than one instance, the WIC Program has helped farmers turn a profit in an otherwise bad year. Mother Nature, pests, crop yields, rising production costs and many other factors have a way of turning each new season into an uneconomical year. Being able to fall back on the WIC Program with confidence, is assuring to our growers. Being able to depend on the income of local Farmers Markets and on the retail sale of their crops helps remove some of the annual risk our farmers face.

To consider allowing supermarkets to accept WIC checks would be a mistake. By allowing supermarkets to accept WIC checks, the sales of homegrown produce grown on the family farm will suffer. Convenience would prompt the average consumer to buy produce in the supermarket while shopping for weekly groceries. The current WIC Program promotes homegrown, farm freshness...a quality that will be lost if the program is changed. If supermarkets were to start accepting WIC checks, there is no doubt that many of the downtown farmers markets would not survive, and many farm stands would experience a loss of income.

It is with utmost respect to New Jersey's hard working farmers that we urge you to reconsider the proposed WIC Program changes.

Sincerely,



Roman Clark

President, Middlesex County Board of Agriculture

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73

NOV - 3 2006



LEWIS & CLARK CITY-COUNTY
Health Department

1930 Ninth Avenue
Helena, MT 59601
PH: 406.4HEALTH or 406.443.2584
Fax: 406.457.8990

November 1, 2006

Patricia N. Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service, USDA
3101 Park Center Drive, Room 528
Alexandria, VA 22302
RE: Comments of WIC Food Packages Rule

OS/LA-77

Dear Ms. Daniels,

On behalf of the Board of Health of Lewis and Clark County, Montana, I am submitting comments on the proposed food package changes for the Special Supplemental Nutrition Program for Women, Infants and Children Food Program (WIC).

We strongly support the suggested changes, with one suggested amendment. We suggest that the proposed jarred infant food be replaced with fresh, frozen or canned fruits and vegetables for infants.

We have several reasons to suggest this amendment:

- Jarred infant food costs six times as much as pureed whole food such as unsweetened applesauce or mashed carrots.
- The proposed single ingredient jarred food is usually shelved with numerous undesirable infant and toddler food choices, including: jarred desserts, infant "juices", and infant sipper cups.
- In Lewis and Clark County, the local Wal-Mart store, where many WIC families shop, shelves infant food right next to undesirable packaged "Graduate" toddler foods, which are becoming a common component of WIC participants' diets.

The WIC food package can have a tremendous impact on the American diet and approach to food preparation. Jarred infant foods are not cost effective. Supporting consumption of jarred infant foods has an impact on agricultural practice, increases energy consumption, and promotes wasteful packaging practices. Replacing these with whole food saves money and more effectively promotes sound nutrition.

Thank you for the opportunity to comment on this important component of the WIC program.

Sincerely,

Chris Deveny
Vice-Chair, Lewis and Clark County Board of Health

NOV - 3 2006



Northern Arizona Council of Governments

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KENNETH J. SWEET
EXECUTIVE DIRECTOR

November 2, 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

OS/LA-81

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

Dear Ms. Daniels,

Thank you for the opportunity to provide comments on the USDA's proposed regulations that substantially revise the WIC Food Packages. On behalf of the Northern AZ Council of Governments (NACOG) Head Start, I am, without doubt, in support of the proposed reforms. It is imperative for WIC to deliver services that are consistent with the 2005 Dietary Guidelines for Americans and aligned with the American Academy of Pediatrics infant feeding recommendations.

NACOG Head Start serves 1709 children through its preschool and infant / toddler programming throughout the non-reservation portions of northern AZ. Our program has a strong and long-standing relationship with the local WIC programs in our service area. Families enrolled in NACOG Head Start are referred to WIC and receive the food packages and nutritional services provided by this invaluable program. NACOG Head Start also provides an array of nutritional services to enrolled families. Our services adhere to the USDA Dietary Guidelines and also support the American Academy of Pediatrics infant feeding recommendations. Unfortunately, WIC and NACOG Head Start

are not sending a consistent message. The proposed changes to the USDA regulations will eliminate this inconsistency.

I also strongly support the cash-value vouchers for WIC families, which will enable them to purchase fruits and vegetables thereby increasing their daily consumption of fruits and vegetables. Additionally, I support the proposals to reduce the amount of milk, cheese, eggs and juice as this action will align WIC with current Dietary Guidelines and recommendations from the American Academy of Pediatrics.

All these proposed changes will strongly reinforce WIC's nutrition education message and ensure that families are receiving a consistent message about dietary guidelines. I urge USDA to conduct its analysis of the comments on the Proposed Rule quickly and efficiently. Publish a Final Rule by mid-2007 at the very latest.

I look forward to working with USDA and WIC to implement these improvements and to impact America's obesity epidemic while helping low-income families make healthier food choices. Better nutrition will result in a healthier American population.

Sincerely,

Susan Hunter
NACOG Head Start Nutrition Manager

A handwritten signature in cursive script that reads "Susan Hunter". The signature is written in black ink and is positioned below the typed name and title.

NOV 13 2005

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

~~Handwritten initials~~ 05/14-86

E-mail: wichq-sfpd@fns.usda.gov

Re: Docket ID # 0584-AD77, WIC Food Packages Rule

Dear Ms. Daniels,

I am pleased to support the proposed changes in the WIC Food Packages that are consistent with the *2005 Dietary Guidelines for Americans* and align with the American Academy of Pediatrics infant feeding recommendations:

- add fruits and vegetables, and whole grain products to the food packages for the first time,
- reduce the amount of certain foods (milk, cheese, eggs, and juice) in order to align with the *Guidelines*,
- provide stronger incentives for continued breastfeeding by providing less formula to partially breastfed infants and providing additional quantities/types of food for breastfeeding mothers,
- replace juice for infants with infant food fruits and vegetables starting at six months, and
- provide lower fat milk for children over 2 years and adults.

These changes, when implemented, will strengthen the WIC program's ability to improve the nutrition and health status of millions of families.

Sincerely,

Sharon Richner

Quincy CA
Pluma County

NOV

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

05/28-87

E-mail: wichq-sfpd@fns.usda.gov

Re: Docket ID # 0584-AD77, WIC Food Packages Rule

Dear Ms. Daniels,

I am pleased to support the proposed changes in the WIC Food Packages that are consistent with the *2005 Dietary Guidelines for Americans* and align with the American Academy of Pediatrics infant feeding recommendations:

- add fruits and vegetables, and whole grain products to the food packages for the first time,
- reduce the amount of certain foods (milk, cheese, eggs, and juice) in order to align with the *Guidelines*,
- provide stronger incentives for continued breastfeeding by providing less formula to partially breastfed infants and providing additional quantities/types of food for breastfeeding mothers,
- replace juice for infants with infant food fruits and vegetables starting at six months, and
- provide lower fat milk for children over 2 years and adults.

These changes, when implemented, will strengthen the WIC program's ability to improve the nutrition and health status of millions of families.

Sincerely,

Edie O'Connor, PA
Plumas County Public Health Agency

Plumas
County
CA

Quincy CA

NOV 01 2005

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

05/LA-88

E-mail: wichq-sfpd@fns.usda.gov

Re: Docket ID # 0584-AD77, WIC Food Packages Rule

Dear Ms. Daniels,

I am pleased to support the proposed changes in the WIC Food Packages that are consistent with the 2005 *Dietary Guidelines for Americans* and align with the American Academy of Pediatrics infant feeding recommendations:

- add fruits and vegetables, and whole grain products to the food packages for the first time,
- reduce the amount of certain foods (milk, cheese, eggs, and juice) in order to align with the *Guidelines*,
- provide stronger incentives for continued breastfeeding by providing less formula to partially breastfed infants and providing additional quantities/types of food for breastfeeding mothers,
- replace juice for infants with infant food fruits and vegetables starting at six months, and
- provide lower fat milk for children over 2 years and adults.

These changes, when implemented, will strengthen the WIC program's ability to improve the nutrition and health status of millions of families.

Sincerely,

Amanda Higgins LVN

*Plumas County
CA
Quincy CA*

FRANK H. MURKOWSKI
GOVERNOR

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STATE OF ALASKA
OFFICE OF THE GOVERNOR
JUNEAU

October 26, 2006

OCT 31 2006

JS/LA-89

Ms. Patricia N. Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, VA 22302

Re: Docket ID Number 0584-AD77, Women, Infants and Children Food
Package Rule

Dear Ms. Daniels:

The State of Alaska commends the United States Department of Agriculture's Food and Nutrition Service for the proposed rule to revise regulations governing the Women, Infants and Children (WIC) food package. The changes will align the WIC food packages with the 2005 Dietary Guidelines for Americans and current infant feeding practice guidelines of the American Academy of Pediatrics. Further goals are to better promote and support the establishment of successful long term breastfeeding and to provide WIC participants with a wider variety of highly nutritious food.

The State of Alaska believes that the inclusion and authorization of canned salmon in the proposed WIC food package III and VII for women fully breastfeeding is a very positive enhancement of this food package.

The inclusion of salmon is consistent with current recommendations and new scientific evidence that seafood consumption, especially fish such as salmon that naturally contain more oil that are higher in eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA), is desirable for the health of all population groups and life stages, which includes the unique nutritional needs of the WIC target population.

In addition to including canned salmon in packages III and VII for women who are fully breastfeeding up to one year postpartum, the State of Alaska recommends and requests the inclusion and authorization of canned salmon for all target groups under:

Ms. Patricia N. Daniels

October 26, 2006

Page 2

- WIC Food Package III and IV (i.e., children one through four years of age),
- WIC Food Package V (i.e., pregnant and partially breastfeeding women – up to one year postpartum), and
- WIC Food Package VI (i.e., women, up to six months postpartum)

All of these food packages are intended for population groups that would benefit from increased intake of seafood with higher quantitative amounts of EPA/DHA. The tables with a full description of the proposed rule food packages can be found in Attachment A. Our rationale for this recommendation is described herein.

On October, 17, 2006, the Institute of Medicine (IOM) of the National Academies, Washington, D.C., released a report "Seafood Choices: Balancing Benefits and Risks," in which the IOM reviewed the evidence on the benefits and risks associated with seafood consumption to help consumers make informed choices and to make recommendations on ways to guide U.S. consumers in making appropriate selections.

In this report, the IOM identified many benefits related to seafood consumption and EPA and/or DHA intake during developmental stages (i.e., pregnancy and/or lactation, infancy and/or childhood) based on clinical trials and epidemiological studies. Some of the potential benefits included: increased duration of gestation; improved infant and child developmental outcomes; cognitive benefits for the children when they were four or five years of age; benefits for infant and child neurological development; and increased infant visual acuity.

Additionally, the IOM developed seafood consumption guidance for population groups based upon both the benefits and risks of contaminant exposure (e.g., exposure to methyl mercury and other contaminants and pollutants in seafood). This guidance indicates that females who are or may become pregnant or who are breastfeeding and children up to the age of 12 may benefit from consuming seafood, especially those with relatively higher concentrations of EPA and DHA with some limitations as to quantity consumed (i.e., up to 12 ounces/week and up to six ounces albacore tuna/week) and avoid large predatory fish (e.g., shark, swordfish, tilefish, or king mackerel). As compared to many other varieties of seafood, salmon contains the least amount of methyl mercury.

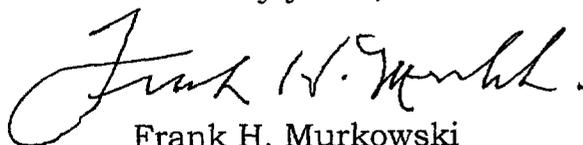
Among fish with high EPA/DHA content, salmon is included with those fish that have the highest concentration per serving. Canned salmon contains

Ms. Patricia N. Daniels
October 26, 2006
Page 3

0.718g (718mg) EPA (20:5 n-3) and 0.685g (685mg) DHA (22:6 n-3) per three ounce (85g) serving. Also, canned salmon contains a variety of other healthful nutrients, such as high-quality protein, calcium, selenium, niacin, vitamins B-6, B-12, and D. Several of these nutrients have been identified in the proposed rule as inadequate in the pregnant, lactating, and non-breastfeeding postpartum women (i.e., protein, calcium, niacin, and vitamin B-6). Saturated fat has been identified as a nutrient with excessive consumption among both children and women. Salmon contains lower amounts of saturated fat than many foods. Additionally, salmon contains only 118 calories per three ounce serving, which makes salmon a nutrient dense food. The nutrient content data referred to herein is based on the nutrition profile in Attachment B adapted from: *U.S. Department of Agriculture, Agricultural Research Service, 2006, USDA Nutrient Database for Standard Reference, Release 19.*

Finally, the addition of canned salmon would enhance the variety of foods offered to the WIC target groups and could positively influence life-long dietary choices for both the women and children in the program. The State of Alaska can facilitate consumer consumption of canned salmon by providing to WIC a variety of economical, tasty salmon recipes that are easy to prepare by a culturally diverse population. The State of Alaska also will provide consumer education materials regarding the benefits of salmon and seafood in a healthful diet.

Sincerely yours,



Frank H. Murkowski
Governor

Attachments

cc: William Noll, Commissioner, Alaska Department of Commerce,
Community and Economic Development
McKie Campbell, Commissioner, Alaska Department of Fish and Game
Alan Austerman, Fish Policy Advisor, Alaska Office of the Governor
Bruce Schactler, USDA Policy Director
Ray Riutta, Executive Director, Alaska Seafood Marketing Institute

Attachment A

Federal Register/Vol. 71, No. 151, Monday, August 7, 2006/Proposed Rules at 44817 -44819

TABLE 2.—MAXIMUM MONTHLY ALLOWANCES OF SUPPLEMENTAL FOODS FOR CHILDREN AND WOMEN IN FOOD PACKAGES IV, V, VI AND VII

Foods ¹	Children	Women		
	Food package IV: 1 through 4 years	Food package V: Pregnant and partially breastfeeding (up to 1 year postpartum) ²	Food package VI: Postpartum (up to 6 months postpartum) ³	Food package VII: Fully breastfeeding (enhanced), (up to 1 year postpartum) ^{4,5}
Juice, single strength ⁶	128 fl oz	144 fl oz	98 fl oz	144 fl oz.
Milk, fluid	16 qt ^{7,8,9,10}	22 qt ^{7,8,11,12}	18 qt ^{7,8,11,12}	24 qt ^{7,8,11,12}
Breakfast cereal	36 oz	36 oz	36 oz	36 oz.
Cheese	N/A	N/A	N/A	1 lb.
Eggs	1 dozen	1 dozen	1 dozen	2 dozen.
Fruits and vegetables ^{13,14}	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.
Whole wheat bread or other whole grains ¹⁵	2 lb	1 lb	N/A	1 lb.
Fish (canned)	N/A	N/A	N/A	30 oz.
Legumes, dry ¹⁶	1 lb	1 lb	1 lb	1 lb.
And/or Peanut butter	Or 18 oz	And 18 oz	Or 18 oz	And 18 oz.

TABLE 3.—MAXIMUM MONTHLY ALLOWANCES OF SUPPLEMENTAL FOODS FOR CHILDREN AND WOMEN IN FOOD PACKAGE III

Foods ¹	Children	Women		
	1 through 4 years	Pregnant and partially breastfeeding (up to 1 year postpartum) ²	Postpartum (up to 6 months postpartum) ³	Fully breastfeeding (enhanced), (up to 1 year postpartum) ^{4,5}
Juice, single strength ⁶	128 fl. oz	144 fl oz	98 fl. oz	144 fl. oz.
WIC Formula ^{7,8}	455 fl. oz. liquid concentrate.	455 fl. oz. liquid concentrate.	455 fl. oz. liquid concentrate.	455 fl. oz. liquid concentrate.
Milk	16 qt ^{9,10,11,12}	22 qt ^{9,10,13,14}	18 qt ^{9,10,13,14}	24 qt ^{9,10,13,14}
Breakfast cereal ¹⁵	36 oz	36 oz	36 oz	36 oz.
Cheese	N/A	N/A	N/A	1 lb.
Eggs	1 dozen	1 dozen	1 dozen	2 dozen.
Fruits and vegetables ^{16,17}	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.
Whole wheat bread ¹⁸	2 lb	1 lb	N/A	1 lb.
Fish (canned)	N/A	N/A	N/A	30 oz.
Legumes, dry ¹⁹	1 lb	1 lb	1 lb	1 lb.
And/or Peanut butter	Or 18 oz	And 18 oz	Or 18 oz	And 18 oz.

Attachment: B

Fish, salmon, canned, solids with bone and liquid

Refuse: 0% USDA National Nutrient Database for Standard Reference, Release 19 (2006)

NDB No: 15084 (Nutrient values and weights are for edible portion)

Nutrient	Units	1.00 X 3 oz ----- 85g
Proximates		
Water	g	58.49
Energy	kcal	118
Energy	kJ	495
Protein	g	16.81
Total lipid (fat)	g	5.14
Ash	g	2.21
Carbohydrate, by difference	g	0.00
Fiber, total dietary	g	0.0
Sugars, total	g	0.00
Minerals		
Calcium, Ca	mg	181
Iron, Fe	mg	0.71
Magnesium, Mg	mg	29
Phosphorus, P	mg	280
Potassium, K	mg	277
Sodium, Na	mg	471
Zinc, Zn	mg	0.78
Copper, Cu	mg	0.087
Manganese, Mn	mg	0.017
Selenium, Se	mcg	28.2
Vitamins		
Vitamin C, total ascorbic acid	mg	0.0
Thiamin	mg	0.020
Riboflavin	mg	0.158
Niacin	mg	5.556
Pantothenic acid	mg	0.468
Vitamin B-6	mg	0.255
Folate, total	mcg	13
Folic acid	mcg	0
Folate, food	mcg	13
Folate, DFE	mcg_DF E	13
Vitamin B-12	mcg	3.74
Vitamin B-12, added	mcg	0.00
Vitamin A, IU	IU	48
Vitamin A, RAE	mcg_RA E	14
Retinol	mcg	14
Vitamin E (alpha-tocopherol)	mg	0.54
Vitamin E, added	mg	0.00
Tocopherol, beta	mg	0.00
Tocopherol, gamma	mg	0.00
Tocopherol, delta	mg	0.00
Vitamin D	IU	530
Vitamin K (phylloquinone)	mcg	0.3

Lipids		
Fatty acids, total saturated	g	1.305
4:0	g	0.000
6:0	g	0.000
8:0	g	0.000
10:0	g	0.000
12:0	g	0.000
14:0	g	0.041
16:0	g	1.148
18:0	g	0.115
Fatty acids, total monounsaturated	g	1.536
16:1 undifferentiated	g	0.396
18:1 undifferentiated	g	0.908
20:1	g	0.231
22:1 undifferentiated	g	0.015
Fatty acids, total polyunsaturated	g	1.742
18:2 undifferentiated	g	0.049
18:3 undifferentiated	g	0.049
18:4	g	0.115
20:4 undifferentiated	g	0.065
20:5 n-3	g	0.718
22:5 n-3	g	0.041
22:6 n-3	g	0.685
Cholesterol	mg	47
Amino acids		
Tryptophan	g	0.189
Threonine	g	0.737
Isoleucine	g	0.775
Leucine	g	1.367
Lysine	g	1.544
Methionine	g	0.498
Cystine	g	0.180
Phenylalanine	g	0.656
Tyrosine	g	0.568
Valine	g	0.866
Arginine	g	1.006
Histidine	g	0.495
Alanine	g	1.017
Aspartic acid	g	1.722
Glutamic acid	g	2.510
Glycine	g	0.807
Proline	g	0.594
Serine	g	0.686



STATE OF MARYLAND
DHMH

NOV - 3 2006

Maryland Department of Health and Mental Hygiene
201 W. Preston Street • Baltimore, Maryland 21201

Robert L. Ehrlich, Jr., Governor – Michael S. Steele, Lt. Governor – S. Anthony McCann, Secretary

Family Health Administration

Russell W. Moy, M.D., M.P.H., Director – Joan H. Salim, Deputy Director

November 3, 2006

Patricia N. Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria VA 22302

os / CA - 90

Dear Ms. Daniels:

I am writing in my capacity as the Deputy Director of the Family Health Administration in Maryland's Department of Health and Mental Hygiene to support the significant changes that are being proposed for WIC's food packages. The extensive research and analysis that went into the proposed revisions are evident, and I congratulate the Food and Nutrition Service for the thoughtful work. The proposed changes in food packages, if enacted, will assist us in better serving our culturally diverse WIC population and in providing more comprehensive nutrition education.

Ms. Kathleen Knolhoff, Director of the Maryland WIC Program, submitted a letter (October 30, 2006) containing a comprehensive review of the proposed changes, and I fully support the recommendations she provided. I would like, however, to add a few comments for your consideration:

- Adding dried beans and peas, or the alternative peanut butter, to the postpartum food package will improve the nutritional value of this package as well as providing another opportunity for nutritionists to reinforce the need for folic acid, so critical to preconception health.
- Allowing the substitution of canned mature legumes for dry beans/peas in food packages III – VII will make these important sources of nutrients more accessible to the WIC population. Preparing dried beans/peas can be a challenge for young WIC mothers who frequently work outside the home, so I would anticipate more participants selecting and consuming the canned beans than previously chose the dried beans/peas.

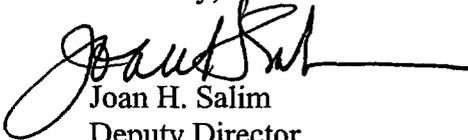
- The addition of fruits and vegetables to all food packages will improve the nutritional value of the packages but, I am sure, will also increase the administrative burden on State and local agencies. For example, if the \$8 and \$6 benefits should be issued in two dollar vouchers (or checks in Maryland), WIC shoppers will have significantly more vouchers to deal with; vendors will have additional processing costs; and WIC State Agencies will have greater banking costs. State Agencies should be given maximum flexibility in how these dollar benefits are administered. States have often shown creativity in administering program benefits, developing methods that can then be used by other agencies.
- While the proposed rule to authorize the substitution of soy-based beverages and tofu in the children's food package is much-needed, I am concerned about the medical documentation required for this substitution. First, this requirement is inconsistent with the current rule for infant formula: no medical documentation is required for an infant receiving soy formula. Second, this requirement may be a barrier to uninsured low-income families who cannot afford an extra trip to a health care provider to obtain a medical prescription. And finally, this requirement could be construed as discriminatory: many more African American, Asian, Native American and Mexican American children as compared to white children are lactose-intolerant and may need or prefer soy-based products rather than milk and/or cheese. These population groups should not be forced to take an extra step to obtain appropriate WIC foods.
- While decreasing the amount of formula provided to infants 0 to 4 months, with increased formula available from 4 to 6 months, is reasonable and appropriate, I have serious concerns about reducing the amount of formula to infants 6 months to one year. The decreased availability of iron-fortified formula, which the AAP recommends as the primary source of nutrition during infancy, may lead to an increase in iron deficiency anemia. The outstanding contribution WIC has made in virtually wiping out anemia in infants and children may be threatened by the proposed changes in the amount of formula provided to both infants who do not breastfeed and partially breastfed infants.
- Finally, I would reiterate the opposition of the Maryland WIC Program to the proposed removal of the State Agency option to categorically tailor or propose food options. Such restrictions decrease the avenues available to improve WIC services and to bring innovations to this already highly-regulated program.

Page Three

I fully support the Food and Nutrition Services' efforts to improve the WIC Program through changes to the food packages. However, the proposed year-long implementation of the changes may not provide adequate time for State Agencies to make the changes necessary, including revising vendor training and food lists, making extensive changes to computer software, and providing training to staff and participants. The administrative costs for these changes may be substantial. I would strongly recommend that additional federal funds be provided to assist State Agencies to implement the new food packages.

Thank you for providing the opportunity for comment on the proposed changes. If you have any questions about the comments I am submitting, please contact me at 410-767-6738.

Sincerely,

A handwritten signature in black ink, appearing to read "Joan H. Salim", with a long horizontal line extending to the right.

Joan H. Salim
Deputy Director
Family Health Administration

cc: Ms. Kathleen Knolhoff
Director, Maryland WIC Program



Oregon

Theodore R. Kulongoski, Governor

Department of Human Services

State Public Health

800 NE Oregon Street

Portland, OR 97232-2162

EMERGENCY (503) 731- 4030

Voice (971) 673-1222

FAX (971) 673-1299

TTY (971) 673-0372

November 1, 2006

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

NOV - 3 2006

OS/CA-92

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

Dear Ms. Daniels:

The Oregon State Public Health Division strongly and enthusiastically supports the USDA issued proposed rule governing the WIC Food Packages published in the Federal Register on August 7, 2006.

The intent of the revised regulations is to improve the nutritional health of all WIC participants. The revisions are grounded in sound science, aligned with the *2005 Dietary Guidelines for Americans*, which support the current infant feeding practice guidelines of the American Academy of Pediatrics and support the establishment of successful long-term breastfeeding. The proposed food packages provide WIC participants with a wider variety of food choices, allow state agencies greater flexibility in offering food packages that accommodate participants' cultural food preferences, and address the nutritional needs of our nation's most vulnerable women, infants and children.

We support the Oregon WIC Program's recommendation that USDA extend the implementation timeline from the proposed one year to three years. The proposed changes to the food package will require major changes to the computer system and will involve training local staff, vendors, clients, and medical providers. A change of this magnitude cannot be implemented in a year. A major project like this will take one year to identify all the necessary changes and determine how they should happen; one year to do the MIS development needed and develop appropriate materials; and another year to

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actually train everyone involved and implement the change. We do not feel we could make this change in less than 3 years. We strongly recommend that the final rule be written so as to allow WIC State agencies maximum discretion and flexibility in implementing these changes.

Again, the Oregon State Public Health Division enthusiastically and strongly supports the proposed rule. We are convinced that it will serve to minimize vendor stock requirements, reduce the administrative burden on States and local agencies, encourage the growth of Farmers' Markets, support participant choice, and most important, focus attention on chronic disease prevention and control.

We look forward to working closing with USDA to fully implement the proposed rule and urge finalization of the rule by no later than the spring of 2007.

Sincerely,

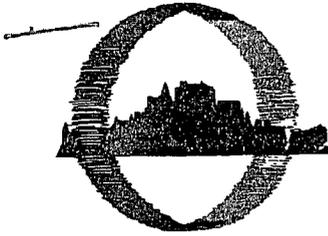


Susan M. Allan, MD, JD, MPH
Public Health Director



Katherine J. Bradley, PhD, RN
Administrator, Office of Family Health





COUNTY OF
Olmsted

NOV - 1 2006

PUBLIC HEALTH SERVICES
2100 CAMPUS DR SE
ROCHESTER MN 55904-4722
507/285-8370
FAX 507/287-1492
www.olmstedcounty.com

October 25, 2006

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

OS/LA-99

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

Dear Ms. Daniels:

Since its inception, The Special Supplemental Nutrition Program for Women, Infants and Children (WIC) has been a premier public health nutrition program. The WIC Program has been very successful, particularly in improving nutrient intakes among low-income participants. Any changes in the food packages should not alter the success of the program in improving nutrient intake for participants.

Olmsted County Public Health Services fully supports the USDA issued proposed rule governing the WIC Food Packages published in the Federal Register on August 7, 2006. The proposed rule takes into account that the health needs of participants and the scientific/nutrition research have changed over the past 30 years. We need to bring the WIC food packages in line with the Guidelines for Americans so that it matches and enhances the nutrition education that is an integral part of the program and its success. Adding fruits and vegetables, whole grains, soy products and reduced fat milk (for adults and children over 2) are consistent with the Guidelines for Americans and current nutrition/health research. The proposed food package rule also supports key public health initiatives that address health disparities, breastfeeding duration, and obesity prevention.

Again, Olmsted County Public Health Services strongly supports the USDA proposed rule for WIC Food Packages. The long-term benefits of providing participants with fruits, vegetables, lower fat dairy products, whole grains as well as additional incentives for fully breastfeeding women will greatly assist WIC in improving life-log health in our most vulnerable women, infants and children.

Sincerely,

Mary Wellik, Director of Public Health
Olmsted County Public Health Services
2100 Campus Drive SE
Rochester, MN 55904



801 - 1 2006

***New Mexico Food and Agriculture Policy Council
3900 Paseo del Sol
Santa Fe, NM 87507
505-473-1004***

OS/LA-100

October 30, 2006

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

Dear Ms. Daniels:

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

The New Mexico Food and Agriculture Policy Council (Policy Council) is writing to offer its support for the revisions in the WIC Food Package Rules as proposed by USDA. In light of the severe health and dietary challenges confronting many Americans, especially those of 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 fresh fruits and vegetables 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 these families.

The New Mexico Food and Agriculture Policy Council is a broad based group of organizations and agencies working together on health, agriculture, anti-hunger, economic development and environment issues, programs and policy implications in New Mexico. The Policy Council focuses both on state and federal policies. This being said, we have discussed the WIC Food Package Rules and our support for the changes. Herein are our specific suggestions and potential beneficial health and economic impacts to WIC recipients and farmers in New Mexico.

We are focusing our request on the increased use of WIC vouchers at farmers' markets. New Mexico has 45 farmers' market of which 39 are currently set up to take the WIC Farmers' Market Nutrition Program (FMNP) vouchers. New Mexico has a 13 year success record in developing and expanding the FMNP program which currently serves over 2,800 WIC clients and close to 900 farmers in the state. The Department of Health has an excellent track record with the program. The New Mexico Farmers' Marketing Association provides professional assistance, education programs, technical assistance to all of the New Mexico's farmers' markets and has been a central support for the progress of the FMNP since its inception.

The proposed WIC Package Rules would benefit close to 61,000 WIC clients in New Mexico. Adding the fruit and vegetable voucher program to the WIC package would mean potential sales of approximately \$575,000 to farmers' markets, grocery stores and supermarkets across the state. For a state like New Mexico that is nationally ranked second worst in food insecurity, third worst in hunger and spends more than \$324 million in health related costs, this program would truly benefit mothers and children who are considered low-income and at health risk.

There are 22 Native American pueblos and reservations in New Mexico that are home to more than 170,000 people. Of these Tribal communities, three have established farmers' markets. There is a commitment by an additional six pueblos to begin farmers' markets in the next two years. The change in the WIC Rules could be of great benefit to these communities.

The New Mexico Food and Agriculture Policy Council strongly supports the following:

- The new WIC package should be specific to **fresh** fruit and vegetable purchased with the vouchers;
- "Do no harm" to the WIC Farmers' Market Nutrition Program. Do not reduce FMNP funding or establish procedures that would adversely affect its operation or effectiveness;
- The proposed regulations, especially the provision that makes farmers' markets eligible WIC vendors;
- Where states or tribes currently operate WIC FMNPs, encourage state and tribal agencies to coordinate the implementation of the new fruit and vegetable program with the WIC FMNP.
- Farmers' markets should be allowed to participate as seasonal vendors, to be exempt from the "WIC-only" cost containment requirements, and not be required to carry a full-range of WIC food package products.
- There should be no limit placed on the type of fresh fruits and vegetables that may be purchased with the new fruit and vegetable coupons. This is specifically important for our Native American and ethnically diverse communities.

Thank you for the opportunity to provide input to the newly proposed WIC Rules and for your consideration of our specific requests. Please feel free to contact us if you have any questions. We can be reached at 505-473-1004.

Yours truly,



Pamela Roy
Coordinator



COUNTY OF LOS ANGELES
Public Health

NOV 8 2 2008



JONATHAN E. FIELDING, M.D., M.P.H.
Director and Health Officer

JOHN F. SCHUNHOFF, Ph.D.
Acting Chief Deputy

313 North Figueroa Street, Room 909
Los Angeles, California 90012
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November 1, 2006

OS/LA-102

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 U.S. Department of Agriculture's (USDA) proposed revisions of the current WIC food packages. As the director of the Department of Public Health for Los Angeles County where thousands of our clients participate in the WIC program, I am pleased to see that our efforts to promote healthy eating practices correspond with WIC's efforts to improve the nutrition of women and children. I commend the USDA for proposing modifications consistent with the *2005 Dietary Guidelines for Americans* published by the USDA and the Department of Health and Human Services and aligned with the American Academy of Pediatrics' infant feeding recommendations.

The proposed changes to the WIC food package support the Los Angeles County Department of Public Health's initiatives to promote healthy birth outcomes and combat the diabetes and obesity epidemics by ensuring that all children and families have access to nutritious foods. I applaud the USDA's proposal to limit the amount of foods high in saturated fats and cholesterol, limit beverages high in sugar, and increase access to whole grain or soy products. In particular, providing whole grain and soy options will enable WIC to better serve Los Angeles' culturally diverse population. The proposed rules also provide stronger incentives for continued breastfeeding, which studies show can provide numerous health benefits, including a reduction in a child's risk of becoming obese later in life.

I strongly support providing mothers and young children in the WIC program 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

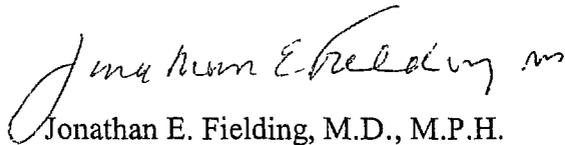
Ms. Patricia N. Daniels, Director
November 1, 2006
Page 2

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 join with the California WIC agency and other stakeholders in asking the USDA to conduct a timely analysis of comments on the proposed changes and publish a final rule by mid-2007.

When implemented, these new guidelines and the corresponding nutrition education will significantly improve the nutrition and health status of thousands of women, infants, and children in Los Angeles County.

Sincerely,

A handwritten signature in cursive script that reads "Jonathan E. Fielding M.D." with a small flourish at the end.

Jonathan E. Fielding, M.D., M.P.H.
Director and Health Officer

JEF:CAH:rk

**IRON COUNTY HEALTH DEPARTMENT
606 WEST RUSSELL
IRONTON, MO. 63650
PHONE: (573)-546-7121 OR FAX: (573)-546-6979
TOLL FREE: 1-888-476-7121**

NOV - 3 2006

November 3, 2006

Would like to see Fruits and Vegetables on food packages.

Thank you,
Lisa Hunt

OS/CA-107

NOV 04 2006



State of New Jersey
DEPARTMENT OF AGRICULTURE
HEALTH/AGRICULTURE BUILDING
JOHN FITCH PLAZA
PO Box 330
TRENTON NJ 08625-0330

JON S. CORZINE
Governor

CHARLES M. KUPERUS
Secretary

OS/CA-
108

November 3, 2006

Ms. 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:

A proposed rule by the USDA to realign the Women, Infant and Children (WIC) food packages to allow participants to purchase fresh produce from supermarkets will change the way that Certified Farmer Vendors in the WIC Farmers Market Nutrition Program (FMNP) presently do business with WIC FMNP participants in New Jersey. The change will considerably diminish the number of WIC clients frequenting our Certified Farmer Vendors.

It is the preference of the New Jersey Department of Agriculture (NJDA) that the WIC FMNP stays in its present form, with the NJDA working in partnership with the New Jersey Department of Health and Seniors Services (DHSS) to assure that our WIC participants can purchase fresh locally grown produce only from New Jersey's Certified Farmer Vendors.

However, should the proposed rule be approved, we recommend that the DHSS and the NJDA maintain their official duties in administering the FMNP and expand the program from the present June to November, to year-round. This change would give local Certified Farmer Vendors the opportunity to provide fresh produce throughout the year and accept the same vouchers used in supermarkets.

The Department of Agriculture has worked very hard and dedicated a lot of resources to develop the community farmer's market system in this state. Many of these markets serve inner-city low-income populations as their only source for fresh produce. The changes being contemplated to WIC have the potential to seriously damage these efforts, even as far as causing markets to discontinue operation. When consumers use their WIC vouchers at community farmers markets, we are ensured they are getting fresh New Jersey grown produce from our local farmers. However, allowing the vouchers to be used in supermarkets provides much less assurance.

It is our hope that you carefully consider these recommendations for WIC participants so that our local citizens can continue to have access to fresh produce from our New Jersey Certified Farmer Vendors.

Sincerely,

A handwritten signature in black ink, appearing to read "C. M. Kuperus".

Charles M. Kuperus



CALIFORNIA
DEPARTMENT OF
EDUCATION

1430 N STREET
SACRAMENTO, CA
95814-5901

NOV 04 2006

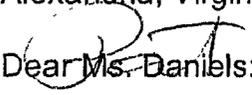
JACK O'CONNELL

State Superintendent of
Public Instruction

PHONE (916) 319-0800

November 3, 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


Dear Ms. Daniels:

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

Thank you for the opportunity to provide comments on the United States Department of Agriculture's (USDA's) proposed regulations that substantially revise the WIC Food Packages.

On behalf of the California Department of Education, Nutrition Services Division, which administers USDA's Child Nutrition Programs, I am pleased to support these long-awaited reforms. We in the CDE and NSD are committed to improving nutrition services for young and school age children through the Child and Adult Care Food Program (CACFP), and see the USDA proposal to improve the quality of food provided by WIC as a key contributor to improved nutrition among children 0-5 years of age.

In fiscal year 2004-05 (latest data available), over 196 million CACFP meals and snacks were served to children in California's child care centers and day care homes. In view of the large number of children receiving their meals and snacks in child care settings participating in the CACFP, it is imperative that these children receive meals and snacks that reflect the current dietary guidelines.

Although the current CACFP meal patterns for infants and older children attempt to provide guidance for healthy meals, the meal patterns need to be updated to better reflect current recommendations from the American Academy of Pediatrics infant feeding and the 2005 Dietary Guidelines for Americans ages 2 and older.

We 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. When implemented, they will

OS/LA-109

greatly strengthen the WIC program's ability to improve the nutrition and health status of millions of families.

1. Timely Implementation of Final Rule. The WIC Community has waited for 32 years for these comprehensive science-based nutritional revisions. 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, we urge USDA to conduct its analysis of the comments on the Proposed Rule quickly and efficiently, and publish a Final Rule by mid-2007 at the very latest. WIC families should not have to wait any longer for better WIC foods!

2. Fruits and Vegetables. We strongly support providing 8.2 million WIC mothers and young children with cash-value vouchers to purchase fruits and vegetables, as recommended by the Institute of Medicine's (IOM) Report: "WIC Food Packages: Time for a Change." While the IOM recommended \$10/ and \$8/month vouchers, the proposed rule reduced this amount to \$8/ and \$6/month in order to achieve overall cost neutrality. We urge USDA to work with Congress to secure increased federal funding in future years to bring the cash value of these fruit and vegetable vouchers up to the IOM-recommended levels, and to keep pace with inflation. This will better assist WIC families to purchase and consume fruits or vegetables each day. However, the proposed voucher levels are an excellent start and should be immediately implemented.

3. Other Positive Changes Will Improve Dietary Intake. We support the proposals to reduce the amount of certain foods (milk, cheese, eggs, and juice) in order to better align WIC with the 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, we 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.

Ms. Patricia N. Daniels, Director
November 3, 2006
Page 3

- 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,



Phyllis Bramson-Paul, Director
Nutrition Services Division

State of California—Health and Human Services Agency
Department of Health Services



California
Department of
Health Services

SANDRA SHEWRY
Director

NOV - 6 2006

ARNOLD SCHWARZENEGGER
Governor

November 6, 2006

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

OS/CA
116

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

Dear Ms. Daniels:

We are writing to express our strong support for the proposed rule change for the Women's Infants and Children's (WIC) Food Packages. The goals of the Cancer Prevention and Nutrition Section (CPNS) of the California Department of Health Services are to increase fruit and vegetable consumption, physical activity, and food security. The new package is an important piece to help reduce chronic diseases and obesity prevention. CPNS manages the country's largest *5 a Day campaign* and Food Stamp Nutrition Education (FSNE) program. The focuses of our interventions are with food stamp eligible populations which are similar to the income qualifications of WIC.

The programs of CPNS are funded by the United States Department of Agriculture through FSNE which strives to improve the health of low-income families through the promotion of a healthy diet that is consistent with the 2005 Dietary Guidelines for Americans. In our work we have found out that cost and availability of fruits and vegetables are serious barriers to low-income families meeting these recommendations. The proposed changes in the food package are a critical strategy in achieving these goals and will make the options more consistent with current dietary guidance.

Food and Nutrition Service (FNS) is to be commended for the proposed addition of fruits and vegetables along with whole grains. Adding fruits and vegetables is critical to establish positive dietary patterns that are conducive to good health in young families. We also support the addition of farmers' markets as an alternate location for WIC participants to redeem their cash-value food instruments.

Providing variety and flexibility in the type and form of fruits and vegetables will be essential to meeting the needs of the diverse populations we serve in California. This proposal supports improved nutrient intakes and helps to address the obesity epidemic that disproportionately plagues California's low-income families by allowing foods that do not contain added sugars, fats, or sodium.

As you proceed through the rulemaking process, please consider the following:

- We recommend that all fruits and vegetables, including white potatoes, with the proposed limitations on fat, sugar, and sodium, qualify for purchase using the fruit and vegetable voucher. WIC pilot projects conducted in California and New York successfully demonstrated that WIC participants will purchase a wide variety of nutrient-dense fruits and vegetables when given a voucher specifically for fruits and vegetables. These projects demonstrated that WIC participants highly valued their fruit and vegetable vouchers, resulting in a 90 percent redemption rate.

In addition, with the creation of the new Fruits & Veggies—More Matters™ brand by the Produce for Better Health Foundation and its national partners, the Centers for Disease Control and Prevention has worked with other federal partners to define strict criteria for determining which food products can carry the new brand. We encourage FNS to recommend that state and local administering agencies urge WIC participants to look for foods that carry the Fruits & Veggies—More Matters™ brand in helping them select a variety of healthy fruits and vegetables.

- We strongly encourage FNS to adopt and fund the recommendations of the Institute of Medicine's (IOM) expert report: "WIC Food Packages: Time for a Change" and provide WIC moms and children with \$10/month and \$8/month, respectively, cash-value voucher for fruits and vegetables. These amounts will help moms and kids eat at least one additional serving of fruit or vegetable each day – a critical objective for reversing the obesity epidemic and for public health.
- In particular, we encourage FNS to urge state and local WIC agencies to use the opportunities provided by the proposed Food Package changes to emphasize increased consumption of fruits and vegetables in their nutrition education activities. The importance of nutrition education is stressed throughout the proposed rule and we suggest that nutrition education efforts coordinate and compliment those provided through FSNE and Child Nutrition programs.

We are dedicated to increasing fruit and vegetable consumption and look forward to an opportunity to work collaboratively with our colleagues in WIC agencies to develop and implement effective nutrition education programs.

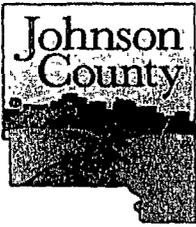
Patricia Daniels
Page 3
November 6, 2006

The proposed changes to the WIC food packages are long overdue and we commend FNS for developing this proposed rule to more accurately reflect current dietary recommendations. The proposed changes have great potential to benefit the health of millions of women and children from all cultures and communities in the United States; as such, we urge FNS to issue the final rule by spring of 2007.

Sincerely,

A handwritten signature in black ink, appearing to be 'Susan B. Foerster', written over a horizontal line. The signature is stylized and somewhat cursive.

Susan B. Foerster, M.P.H., R.D.
Chief, Cancer Prevention and Nutrition Section
California Department of Health Services



NOV 06 2008

PUBLIC HEALTH

Ralph Wilmoth, MPH, MPA
Director

Promoting Health. Preventing Harm.

November 2, 2006

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

os/CA-119

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

Dear Ms. Daniels:

I am writing to express my support for the proposed rule to change the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) food packages. I am the director of Johnson County Public Health located in Iowa City, Iowa. My department offers WIC in addition to other maternal and child health services.

I believe the changes reflected in the proposed rule are consistent with the *2005 Dietary Guidelines for Americans* and national nutrition guidance including those from the American Academy of Pediatrics. These changes will promote a healthier lifestyle to a population of low-income people with medical and nutritional risks while reflecting cultural sensitivity and greater variety of food choices. This can only lead to a reduction in chronic diseases and increase overall health.

Since the proposed rule is still in the deliberation stage, I request that you take the following comments and recommendations into consideration:

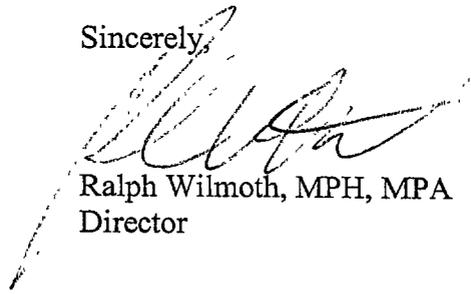
- The food package for partially breastfeeding women should not be piloted. This testing period could last three years and delaying the implementation of this package will result in many women choosing to formula feed. Fully breastfeeding, partially breastfeeding and fully formula feeding women's food package changes should be implemented concurrently.
- A restriction of any formula during the infant's first month for women who try to exclusively breastfeed may cause anxiety for some of these women which would lead to no attempt to breastfeed at all. While the spirit of the proposed rule is to promote breastfeeding, the opposite effect may result. I would suggest the option to provide at least one can of formula during this time following consultation with a WIC dietitian, and ideally additional formula at the dietitian's discretion.

- In the same way, the proposed restrictions of formula amounts offered to partially breastfed infants does not take into account the difficulty their mothers may have finding an appropriate place to express milk upon returning to school or work. The formula quantities in the proposed rule would provide 12 oz, 14.5 oz, and 10 oz per day based on the three food packages which would most likely not be sufficient in light of limited amounts of expressed milk obtained during the workday. Again, the amount of supplemental formula should be at the discretion of the WIC dietitian. Partially breastfeeding mothers should be allowed to receive WIC benefits throughout the infant's first year.
- I have a concern that the proposed rounding methodology for infant formula is too complicated and would not be administratively feasible. Formula container sizes change, new formula products are developed while others discontinue, and clients present formula prescription changes. These situations make the rounding method cost-prohibitive. In addition, the proposed rounding methodology will result in varying the number of formula cans the infant receives over a series of months. This will lead to confusion and potential claims of discrimination.
- The decrease in the amount of milk provided in all food packages is acceptable. However, there should not be a steadfast restriction against whole milk for children two years of age and older. There are certain circumstances in which whole milk would be recommended (e.g. small stature three year old requiring increased calories) and this decision is best left to the WIC dietitian.
- Currently, there are no calcium-fortified soy-based beverages on the market that meet the proposed protein and potassium standards. Minimum standards of 6.25 grams of protein and 250 milligrams of potassium per 8 ounce serving should accommodate this. While the milk substitutions proposed are desirable there is no need to require medical documentation for children in order to issue those foods to them. Medical documentation would place a burden on local health care providers since registered dietitians do not have prescriptive authority.
- The introduction of providing vegetables and fruits through WIC is excellent. I would encourage you to increase the dollar amount provided to fully breastfeeding women to \$10 to provide further incentive and support for breastfeeding. The dollar denomination of the cash-value vouchers and the minimum vendor stocking requirements should be determined by the states. This will better ensure accessibility, cultural appropriateness, and affordability of produce. Furthermore, participants should be able to pay for any excess costs for fruits and vegetables beyond the value of the cash-value vouchers to avoid stigma and maximize efficiency at the grocery check-out.
- The whole grains component and decreased amount of juice are also excellent proposals. However, please take into account the feasibility of obtaining these foods at the market. Loaves of whole grain bread generally weigh more than one pound. I would recommend allowing up to 24 ounces per loaf of bread. WIC-approved juices are available mostly in 46 oz or 64 oz containers with limited varieties in 32 oz containers. The proposed 128 oz of juice does not efficiently divide well with 46 oz or 64 oz containers. I would suggest a 144 oz juice allotment for Food Package IV.

- The addition of canned beans, canned low-mercury fish and jarred baby food show great insight into the WIC population's needs and are excellent additions to the food packages. Considering that many infants are eating table foods by 9 months, it may be more practical to offer jarred foods at 6 – 8.9 months and the choice of fruit and vegetable cash-vouchers or jarred foods at 9 – 11.9 months. Jarred meats can be retained for exclusively breastfeeding infants along with fruit and vegetable cash-vouchers.

I appreciate the opportunity to share my comments and recommendations with you regarding the proposed rule.

Sincerely,



Ralph Wilmoth, MPH, MPA
Director

OS-VA
139

Date: 10/16/06

Dear Friends at US Department of Agriculture,

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

What I like most about the proposed changes is

That there are more foods with dietary fiber and less sugar, also more choices with the whole grain foods. low fat milk has more calcium. So overall much healthier

What I like least about the proposed changes is

Thank you for reading my comments.

Sincerely,

Adriana Diaz

Adriana Diaz

Name: Santa Cruz Head Start

Title: Family Service Worker

Organization:

NOV 03 2006

Date: 10/16/06

~~OS~~
OS-LA

Dear Friends at US Department of Agriculture,

140

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

What I like most about the proposed changes is

Fruits and vegetables, Increase whole grains

What I like least about the proposed changes is

I like everything

Thank you for reading my comments.

Sincerely,

Name: Margarita Garcia

Title: Family Service Worker

Organization: Santa Cruz County Head Start

NOV 03 2006

05/CA
142

Date:

Dear Friends at US Department of Agriculture,

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

What I like most about the proposed changes is

The policy changes would encourage the purchase of more fresh fruits and vegetables and offer "early exposure" to these foods for children.

What I like least about the proposed changes is

I can't see any negative impact from the changes - only positive.

Thank you for reading my comments.

Sincerely,

Name:

Lisa Berkowitz

Title:

Program Director

Organization:

Community Bridges - Meals on Wheels

OS/LA-143

From: WebMaster@fns.usda.gov
Sent: Thursday, October 05, 2006 11:35 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Kay Bosick
EMAIL: kayb@yfs.org
CITY: Vallejo
STATE: California
ORGANIZATION: Community based non profit agency
CATEGORY: Other
OtherCategory: CBO serving families with children
Date: October 05, 2006
Time: 11:35:18 AM

COMMENTS:

We include nutritional information in our work with families and encourage them to develop healthy life styles. These changes to WIC will allow them to stay healthy and develop healthy eating habits.

OS/LA-144

From: WebMaster@fns.usda.gov
Sent: Tuesday, October 10, 2006 12:11 PM
To: WICHQ-SFPD
Subject: Vendor Cost Containment Interim Rule Comments

NAME: Sandy Edmondson
EMAIL: sandy.edmondson@nashville.gov
CITYSTATE: Nashville, TN
ORGANIZATION: Metropolitan Government of Nashville & Davidson County WIC
Vendor Management
CATEGORY: OTHER
OtherCategory: Metropolitan Government

COMMENTS:

The proposed changes of adding fruits and vegetables and whole grains to WIC food packages and modifying the amounts of some current foods, enhances the importance of nutrition and the affects of obesity seen throughout our country. Changes to the food package will allow for the increasing demand for additional food options consistent with cultural preferences. I think Peggy Lewis said it best when she was quoted as saying, "This proposal brings WIC Food Packages in line with current dietary science."

OS/LA-145

Docket ID Number 0584-AD77, WIC Packages Rule
From: Rogers, Catherine J [cjrogers@ufl.edu]
Sent: Thursday, October 12, 2006 1:50 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Packages Rule

I strongly encourage the proposed rule, especially allowing whole fruits and vegetables in place of the over-abundance of juice that currently is allowed on WIC. It is wise to stress limiting juice for children and increasing fiber across all ages. Currently WIC packages give contradictory information by allowing juice and non-whole grain cereal. The inclusion of soy milk and yogurt is also a step in the right direction. I propose that the yogurt be ulow-fat, unsweetened and with live cultures. I would also like to suggest the inclusion of organic products especially eggs, milk and yogurt. Organic products are slightly more expensive but the increased acceptance and availability will push the prices down. Hormone free dairy would greatly benefit our children. Thank you.

Cathy Rogers
Family and Consumer Sciences / 4-H Agent
Suwannee County Extension Service
386-362-2771
cjrogers@ifas.ufl.edu

OS/LA-146

From: Minal Amlani [minal@headstart.sfsu.edu]
Sent: Thursday, October 12, 2006 5:15 PM
To: WICHQ-SFPD
Subject: wic package

This is a great and much needed addition to the WIC package. We have been promoting fruits, vegetables and whole grains for years however it is great to support this education with actual access to these products. I am looking forward to this change.

Minal Amlani, MPH, RD
San Francisco Head Start Program
Nutrition Services Manager
Tel: 415.503.1604

OS/LA-147

BlankFrom: Natalie Fink [natalie@headstart.sfsu.edu]
Sent: Friday, October 13, 2006 11:30 AM
To: WICHQ-SFPD
Subject: WIC program to add Fruits, Veggies and Whole grains

As a Health Advocate for some of the lowest income families in the city and county of San Francisco, I strongly encourage the addition of Fruits, Veggies and Whole Grains. Its a huge challenge for the families I work with to provide the nutritious foods from these food groups. I continually see children who CHOOSE to eat fruits and veggies in school eating other processed sugars and unhealthy alternatives because their families don't have the resources to provide the fruits and vegetables. They also choose the 'quick fix' unhealthy choices because they aren't sure what fruits and veggies they will enjoy and be able to prepare. Please, Please add these foods to your program. The largest health concern on my mind is obesity. I find nearly a third of the children in my program are overweight for their height/weight/age group. This would significantly improve these children's chances of leading a healthy life.

Thank you for the work you already do and that which you have the potential to do!

Natalie Fink

Natalie Fink
Health Worker
San Francisco Head Start
natalie@headstart.sfsu.edu

Ella Hill Hutch
1050 McAllister St.
San Francisco, CA 94115
415-885-6547

OMI
1111 Junipero Serra
San Francisco, CA 94132
415-337-0221

Westside
2400 Post St.
San Francisco, CA 94115
415-474-7637

OS/LA-148

From: Barbara Novak [BarbaraN@elrio.org]
Sent: Monday, October 16, 2006 3:57 PM
To: WICHQ-SFPD
Subject: Docket ID 0584-AD77 WIC food Pkg. rule

I am in support of the proposed rule to offer only skim or 1% milk to children over age 2 and to adults, as long as there are no medical indications to do otherwise. We should be encouraging our patients to have a low fat diet.

Barbara Novak, CNM
El Rio Health Center/Sunnyside Teenage Parent Program
Tucson, AZ 85706

OS/LA-151

From: WebMaster@fns.usda.gov
Sent: Monday, October 16, 2006 5:22 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Valerie Comeaux
EMAIL: vacomeaux@co.riverside.ca.us
CITY: Riverside
STATE: CA
ORGANIZATION: County of Riverside Department of Public Health Nutrition Services
CATEGORY: Other
OtherCategory: Public Health Department-California Nutrition Network
Date: October 16, 2006
Time: 05:22:25 PM

COMMENTS:

The addition of fresh fruits, vegetables and breads will help reinforce the importance of eating healthy well balanced meals especially among low-income families. Furthermore, these changes may encourage those who are satisfied and eligible for the program to return because they will value the program more because of wide range of foods offered besides cheese and milk. Hopefully, having fruits and vegetable available will increase consumption and the dollar amount the participants can spend toward purchasing more produce.

OSLA-154

email to wichq-sfpd 11-06-06 from Hobbs, Patricia (DTA)
[Patricia.Hobbs@state.ma.us]

November 1, 2006

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

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

Dear Ms. Daniels:

As a member of the **Massachusetts Nutrition Board**, I strongly and enthusiastically support the USDA issued proposed rule governing the WIC Food Packages published in the Federal Register on August 7, 2006. The Board is a state advisory board that is a resource on matters related to the nutritional status of citizens in the Commonwealth of Massachusetts. The Board is comprised of leaders in the field of food, nutrition and health and influential members of their community who serve as advocates on issues of food and nutrition.

The proposed regulations improve the nutritional health of all WIC participants and are grounded in sound science, align with the *2005 Dietary Guidelines for Americans*, support the current infant feeding practice guidelines of the American Academy of Pediatrics, and support the establishment of successful long-term breastfeeding. The proposed food packages provide WIC participants with a wider variety of food choices, allow state agencies greater flexibility in offering food packages that accommodate participants' cultural food preferences, and address the nutritional needs of our nation's most vulnerable women, infants and children.

The proposed rule reflects recommendations made by the Institute of Medicine (IOM) of the National Academies in its report, "WIC Food Packages: Time for a Change." It follows the advice of the Institute, which stated that the WIC Program needs to respond to changes in nutrition science, demographics, technology, and the emerging health concerns in the WIC community. The changes in the proposed rule are consistent with nutrition education promoting healthier lifestyles and food selections to reduce the risk for chronic diseases and to improve the overall health of WIC's diverse population. The Department's aim is to add new foods while preserving cost neutrality—to cover the cost of the new foods, the proposed adjustments to juice, eggs and milk are highly acceptable.

We believe that WIC clients will be pleased that there will be more choices in the foods offered.

The **Massachusetts Nutrition Board** has the following recommendations regarding the proposed rule.

Breastfeeding

The proposed rule aims to support breastfeeding, with appropriate complementary foods after the first six months, until the infant's first birthday.

We do not support the recommendation to pilot test the food package for the partially breastfeeding woman. With a delay in implementation of the partially breastfeeding package, we believe that many women will simply choose to formula feed in order to benefit from the changes to the new fully formula feeding package. We recommend that the fully breastfeeding, partially breastfeeding and fully formula feeding woman's food package changes be implemented concurrently.

We urge that the dollar amount for fruits and vegetables provided to the fully breastfeeding woman be increased to \$10, matching the IOM recommendation, for at least the first six months post partum. This would provide stronger incentive and support for breastfeeding in the period of time prior to the addition of complementary foods for fully breastfeeding infants at six months. If the USDA is unable to match the IOM recommendations for this group of women for this six month period, they should, at a minimum, allow States to act within the limits of their food funding to exceed the current maximum dollar amount for the fruits and vegetables vouchers for women within the first six months of breastfeeding.

We would also suggest that States be given the option to provide the breastfeeding infant, in the first month, with 1) no formula, or 2) one can of powdered formula as recommended by the IOM. States would incorporate their option into their existing breastfeeding policies and procedures. An evaluation of the impact of these options on a mother's breastfeeding status will also allow USDA to determine an appropriate future course of action.

State agencies will also require additional resources to provide enhanced breastfeeding support, peer counseling services and pumps to participants in order to ensure that WIC mothers feel comfortable foregoing formula within the first month and thereafter to help ensure breastfeeding success and optimal nutrition for their infants. WIC is the only national program that provides this level of breastfeeding education and support to the WIC population and must ensure that these changes to promote breastfeeding do not have the converse effect because mothers are afraid to give up all WIC formula benefits.

Fruits and Vegetables

beverages and tofu for children can be a cultural/personal preference as well as a medical necessity. Since State policies and procedures for services and follow-up to medically diagnosed conditions will continue to be in place, this proposed rule will place an undue burden on the medical community and WIC service delivery systems and delay access to an important calcium source for WIC children.

Whole Grains

The proposed rule's establishment of a 51% whole grain requirement for breakfast cereals and inclusion of whole grain bread and other grains for all children and pregnant and breastfeeding women is consistent with the *2005 Dietary Guidelines for Americans* which recommend that refined grains be replaced with whole grains.

The **Massachusetts Nutrition Board** recommends that USDA increase the allowable amount of whole grain bread from 16 ounces to one loaf up to 24 ounces, an amount consistent with the sizes available in stores.

In order to accommodate the medical needs of certain participants, we support the IOM recommendation to allow States to make substitutions for "wheat-free" and "gluten-free" cereals based on a medical prescription and urge the Department to include such a provision in the final rule.

Vendor Regulations

The **Massachusetts Nutrition Board** recommends that the USDA allow States to utilize existing Farmers' Market Nutrition Program vendor certification procedures for authorizing Farmers' Markets to participate in the WIC fruit and vegetable cash-value voucher program. The Board supports utilizing the existing FMNP structure and personnel for vendor authorization and compliance. Taking advantage of FMNP resources would greatly reduce the administrative burden on State WIC agencies and maximize the opportunities for small, local growers to participate in the WIC program. Without these changes, the proposed rule requirements would make the participation of farmers impossible to implement.

Voucher Redemption

The **Massachusetts Nutrition Board** recommends that USDA give State agencies the discretion to determine the dollar denomination of the fruit and vegetable cash-value vouchers. It is essential that State agencies determine the dollar value of the cash-value vouchers in partnership with vendors to assure appropriate redemption levels and to save already tight Nutrition Services dollars. Printing of multiple vouchers in small, two-dollar denominations is costly and counter productive.

USDA must give State agencies the flexibility to work with existing WIC vendors and the FMNP to develop and implement effective food instrument redemption procedures for fruits and vegetables cash-value vouchers that minimize administrative

costs, processing errors, and are responsive to current WIC vendor and FMNP systems.

Categorical Tailoring and Substitution Requests

The **Massachusetts Nutrition Board** is opposed to the removal of the State option to categorically tailor or propose food substitutions. There are rapid changes in food industry, science, demographics and other factors in today's environment, and State agencies may need to submit proposals for cultural accommodations or categorical tailoring in the future. USDA's history of regulatory review and revisions to the WIC food packages substantiates the critical need for this flexibility. It is essential that States be allowed the ability to revise food lists to keep pace with the needs of their participants.

Implementation

The **Massachusetts Nutrition Board** recognizes that implementing the proposed rule will require good planning and effective communication. There is great excitement and anticipation within Massachusetts regarding the promulgation of a final rule revising the WIC food packages. We are looking forward to full implementation the proposed rule in an expeditious manner. We recommend that USDA partner with State agencies and the National WIC Association to assure a reasonable and flexible implementation timeframe from the date of publication of the final rule.

In closing, as a member of the **Massachusetts Nutrition Board** and in support of the Board's positions, I enthusiastically and strongly support the proposed rule with the above noted recommendations. I am convinced that it will support participant choice and focus attention on chronic disease prevention and control. The proposed food packages will provide greater amounts of all of the priority nutrients currently identified as needed by the WIC population. They will supply a reliable and culturally acceptable source of supplemental nutritious foods as well as promote and support breastfeeding. Equally important, the proposals will provide WIC professionals with the necessary tools to reinforce the nutrition education messages and promote healthier food choices. In addition, the outlined recommendations will serve to reduce the administrative burden on States and local agencies and encourage the growth of Farmers' Markets.

WIC is this nation's premier public health nutrition program. 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.

I look forward to the full implementation the proposed rule and urge finalization of the rule by no later than the spring of 2007.

Sincerely,

Edward Sanders-Bey
Assistant Commissioner for
Policy & Program Management
Department of Transitional Assistance
Boston, Massachusetts

OSLA-155

**email to wichq-sfpd 11-06-06 from Sonia Torres
[storres@asda.gobierno.pr]**

November 6, 2006

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

Dear misses Daniels:

RE: Comments from the Puerto Rico
Department of Agriculture Regarding Proposed
Changes to the WIC Program Packages

The major concern from our standpoint as agricultural agency administrators is that we wish to maximize the favorable effect that the investment in USDA funds in supplemental nutrition programs can have on our agriculture and our economy. We maintain the view that agricultural marketing assistance is the original basis for supplemental nutrition programs administered by USDA.

We request Buy American provisions be enforced more diligently within procurement guidelines for all supplemental nutrition programs in Puerto Rico, including WIC.

In consonance with Food and Nutrition Service priorities, we favor increased consumption of fresh fruits and vegetables and welcome the provisions that allow for increased purchasing facilities for WIC beneficiaries. We would encourage that WIC clients' be granted more flexibility to make frequent smaller purchases in the cases of juices, milk and other fresh perishable items by whatever means necessary because that way they could purchase fresh (unprocessed and un-conserved) products in smaller amounts at the rhythm in which they are consumed instead of being forced to purchase large quantities, which precludes purchasing things that would spoil at a short time. This would require a greater allocation of total benefits to this purpose.

We will be suggesting to the State Agency that, to promote increased consumption of fresh fruit and vegetables, a portion of the funds allocation for each beneficiary be destined to purchase fresh fruit and vegetables at farmers' markets. We suggest this be distributed in a manner such as is done for the

Page 2

WIC Farmers' Market Nutrition Program. The program has been successful in Puerto Rico and thanks to the particular climate of our island, could be converted into a year-long continuous program, not only a summer program.

In general, we are preoccupied by and oppose the action of reducing the maximum amounts of eggs, fruit juices and dairy products in various packages.

Responsibly, we have requested comments from representatives of the different agro-industries. We have obtained the response from two: egg producers and Dairy producers, who feel they have been affected adversely by the recommendations to reduce the maximum amounts of their products to be included. These are summarized following and also included in complete text so that USDDA official can take into account the complete comments.

Puerto Rico Dairy Industry

Expresses opposition to authorization of calcium-fortified soy beverages, for the following reasons:

Nutritional argumentation, milk includes wide variety of additional nutrients

To be consistent with food pyramid, this suggests milk.

Cost of soy beverages is higher than milk, less cost-efficient, less nutrition-efficient.

Limited acceptance of soy beverages because of cultural reasons.

Threatens stability of milk industry.

Office for the Regulation and the Promotion of the Egg Industry

Objects to changes in egg consumption as part of the supplemental food packages because:

Changes do not reflect cultural factor changes as alleged.

Disagree with nutrition arguments that consider eggs not to be a "priority nutrient"

Disagree with cholesterol-related arguments that are used to justify reduction consumption and

State that cholesterol and priority nutrient argumentation is inconsistently applied between different packages according to group.

Cordially yours,

Saritza Aulet Padilla
Assistant Manager
Agricultural Services and
Development Administration
From the Department of Agriculture

OSLA-164

From: WebMaster@fns.usda.gov
Sent: Thursday, October 26, 2006 4:10 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Nancy Jorm
EMAIL: njorm@ldchd.lawrence.ks.us
CITY: Lawrence
STATE: KS
ORGANIZATION: Lawrence-Douglas County Health Department
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 26, 2006
Time: 04:09:39 PM

COMMENTS:

I heartily support the proposed revisions to the WIC Food Packages. Making these changes as recommended by the Institute of Medicine will immediately improve the diets of WIC participants as well as help establish and reinforce healthy dietary intake that can influence food choices throughout the lifespan. The potential for both short and long term impact of these changes is immense. I encourage you to follow these IOM recommendations and make the food package changes as proposed.

From: WebMaster@fns.usda.gov
Sent: Thursday, October 26, 2006 1:53 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

OSLA-165

NAME: Jackie Sergent
EMAIL: jackie.sergent@ncmail.net
CITY: Oxford
STATE: NC
ORGANIZATION: Granville-Vance District Health Dept
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 26, 2006
Time: 01:52:57 PM

COMMENTS:

It is about time that changes like these are made! Bravo! I am only concerned that by decreasing the formula allowed for partially breastfeeding babies, you will cause a portion of reluctant-to-try breastfeeding moms to not bother trying and to stick with 100% formula feeding because they perceive that as "the better deal". Have you done any social marketing to discover what are the enablers/incentives that could push women that are tentative about breastfeeding into deciding to breastfeed? Personally, I suspect that if you lowered the amount of formula given to solely formula feeding dyads, so it did not look like the "best deal", that might do the trick. There is still not enough of a financial consequence to mothers for deciding to 100% formula feed. When there is, there might be a more natural shift to breastfeeding. Thank you!

PS - while I am currently a non-WIC health professional, I did direct a 2-county WIC program in NC for nearly 10 years. It was always a struggle to address the money saving aspects of breastfeeding to a population that would never really grasp the full import of that issue; and no other negative consequence of bottle-feeding is so immediately observable.

OSLA-166

From: WebMaster@fns.usda.gov
Sent: Thursday, October 26, 2006 2:31 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Tereasa Wallace
EMAIL: twallace@co.boulder.co.us
CITY: Lafayette
STATE: CO
ORGANIZATION: Boulder County Public Health Department
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 26, 2006
Time: 02:30:53 PM

COMMENTS:

I think these changes will provide continued credibility for the WIC program since they bring the food package in line with best practices regarding diet and nutrition

OSLA-167

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 12:31 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Linda Wilson
EMAIL: lwilson@co.boulder.co.us
CITY: Boulder
STATE: CO
ORGANIZATION: Boulder County Public Health
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 27, 2006
Time: 12:30:50 PM

COMMENTS:

I strongly support the proposed changes to the WIC food package.

OSLA-168

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 12:53 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Chana Goussetis
EMAIL: cgoussetis@co.boulder.co.us
CITY: Boulder
STATE: Colorado
ORGANIZATION: Boulder County Public Health
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: October 27, 2006
Time: 12:53:29 PM

COMMENTS:

The proposed rule will better reflect the current nutritional guidelines such as the new CDC fruits and veggies finding (13 servings per day) and will also help combat obesity. It is a necessity!

OSLA-169

From: Penny Riley [priley@schd.org]
Sent: Friday, October 27, 2006 1:58 PM
To: WICHQ-SFPD
Subject: Proposed changes to WIC food packages

As a public health nurse, I fully support the changes as proposed to WIC food packages to include fruits, vegetables, soy products and whole grains. We must all work together to reduce childhood obesity, and this step will help parents make choices they otherwise might not make. Thank you

Penny Riley, BSN, RN, NCSN

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OSLA-170

From: no-reply@erulemaking.net
Sent: Wednesday, October 11, 2006 2:02 PM
To: CNDPROPOSAL
Subject: Public Submission

Please Do Not Reply This Email.

Public Comments on Special Supplemental Nutrition Program for Women, Infants and Children (WIC): Revisions in the WIC Food Packages:=====

Title: Special Supplemental Nutrition Program for Women, Infants and Children (WIC):
Revisions in the WIC Food Packages FR Document Number: 06-06627 Legacy
Document ID:
RIN: 0584-AD77
Publish Date: 08/07/2006 00:00:00
Submitter Info:

First Name: Jennifer
Last Name: Andregg
Mailing Address: 116 N. 2nd Ave.
City: Logan
Country: United States
State or Province: IA
Postal Code: 51546
Organization Name: Harrison County Learning for Life

Comment Info: =====

General Comment: Dear Patricia N. Daniels and others who it may concern:

The proposed changes in the WIC Food Packages seem excellent! They will be good for nutrition, attachment, and reducing waist.

As a home visitor for Harrison County's Learning for Life, Parent's as Teachers program, your changes will help me to better encourage families to have healthy diets. In the past a family has justified giving high fat snacks by saying that WIC did not provide fresh vegetables. This excuse will no longer work. Other families have not understood why 100% juice, still high in sugar, should be limited, because WIC provided so much juice.

Your encouragement of breast feeding is helpful for attachment. I regularly teach parents about the need for strong attachment at an early age. As you know it has huge effects on the child through life.

Besides improving health, your changes will prevent waist. Multiple families have shared that they had more juice than they knew what to do with, but bought more simply because the amount was offered.

Sincerely,
Jennifer Andregg