

LA-1172

FW: Please support improvements to the WIC food packages  
From: Cynthia Mense [CMense@phcenters.com]  
Sent: Monday, November 06, 2006 10:53 AM  
To: WICHQ-SFPD  
Subject: FW: Please support improvements to the WIC food packages

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

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

Dear Ms. Daniels:

As a dietitian I strive to feed my family a healthy diet every day. When I counsel young mothers in WIC I want to tell them to buy the same things I do. One way to get closer to this ideal where poor kids can have access to healthy foods is to support the WIC Food Packages Proposed Rule and the U.S. Department of Agriculture's (USDA). For the first time in my 10 years with WIC I am excited about the changes. As USDA finalizes the regulations, please consider the following suggestions to further strengthen the final rule.

- provide the full fruit and vegetable benefit as recommended by the Institute of Medicine, with regular cost of living adjustments (COLA).
- limit sodium in canned or frozen vegetables to no more than 480 mg per serving (the disqualifying level for the Food and Drug Administration's [FDA] "healthy" claim).
- eliminate the use of fruit juice for infants and decrease the quantity of juice for children and women in the food packages.
  
- require 3 grams of fiber in whole grain products while limiting added sugar to 6 grams or less for WIC cereals
- allow soy-based beverages and calcium-set tofu as substitutes for milk in Food Package IV, V, VI, and VII.
  
- allow for reduced fat cheeses

-- build in incentives for breastfeeding moms

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

Sincerely,

Cynthia G. Mense MS, RD, LD  
Director of Community Nutrition Programs & Services  
People's Health Centers  
5701 Delmar  
St. Louis, MO 63112  
314-367-7848  
Name

From: Ritchie, Margaret [MRitchie@OperationThreshold.org]  
Sent: Monday, November 06, 2006 11:13 AM  
To: WICHQ-SFPD  
Subject: Proposed changed to the WIC food package.

I am a registered dietitian employed with the Operation Threshold WIC program in Waterloo, Iowa. I am writing because of my concern for the infants and children with the upcoming food package changes. I noticed that the panel that did the proposed revisions, while they worked toward a common goal, for the most part, the team lacked nutrition and biochemical knowledge to make the kind of decisions that will truly be manageable for the parent or the retailer as we currently market and manage the WIC Program.

We currently know that an infant needs 11.8 milligrams of iron to the brain every day for normal cognitive thinking processes to develop. An infant needs to consume 30 oz of infant formula a day to meet this need.

Newborn infants that are formula fed do not need to intake the 30 oz of formula a day because they will have adequate iron stores from their parent until they are about 4 months old. After 4 months they will need to consume a minimum of 30 oz of formula a day to meet the daily need of the rapidly developing human brain.

The belief that the infant can obtain the additional iron required for brain development by adding cereal to their diet is misleading. Chemists' from the infant food manufactures will tell you that the iron that is added to infant cereal is not an absorbable form for the human gut. The iron that can be absorbed by the human gut turns the color of the cereal a medium gray color and no parent will feed it to their child because they think it has gone bad.

In addition, if you think they are going to get enough iron from eating infant jar processed dinners, an examination of the protein content of the dinners will tell you that most of them have one half of one gram of protein in them. Since you have 464 grams in a pound, your math skills should tell you that you mostly have the smell of the protein food in the jar and little else.

In the future I see my nutrition counseling skills focused on finding additional formula resources for the formula feeding mothers and constantly reinforcing the need to delay cow's milk until after one year. As my fellow dietitian Stephanie Hookum stated, they will just give them cow's milk and fill them up on calories from Kool aid in order to be able to keep them from crying because they are so hungry.

I applaud the changes to the Childs food package, but I fear it is not workable until system wide changes are made including the ability to pay some cash for your WIC

~~produce purchases. However, I would not decrease the amount of dairy foods given to~~  
children. In many cases, the daily foods provided are fulfilling a dual need, meeting both  
the daily calcium and protein needs in the Childs diet.

Thank you for giving all of us the opportunity to comment on the proposed changes.  
Ideally, we will not deny any of our need members of society, especially these most  
vulnerable ones, their basic needs. Please carefully evaluate these changes before  
implementation.

LA-1176

From: WebMaster@fns.usda.gov  
Sent: Monday, November 06, 2006 12:05 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Linda Holmes, RN, BSN, IBCLC  
EMAIL: lholmes@dhd10.org  
CITY: Manistee  
STATE: Mi  
ORGANIZATION: District Health Dept #10  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: November 06, 2006  
Time: 12:04:41 PM

COMMENTS:

The reforms are greatly positive! I would like to see the 1-1.9 yr old be able to receive reduced fat milk with medical documentation. With the addition of fruits & vegetables & bread, rice or tortillas, clients can actually make balanced meals using only the foods from their WIC coupons. Breastfeeding is strongly supported. All the pieces are in place. I can't wait!

From: Susan Hennon [susanh@searhc.org]  
Sent: Monday, November 06, 2006 12:09 PM  
To: WICHQ-SFPD  
Cc: 'Wayne, Kathleen'  
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule - SEARHC WIC Program - Juneau,AK

Dear. Ms. Daniels,

I am writing to thank USDA and FNS for its efforts to improve the quality of the WIC food packages. The proposed changes will bring our program in line with current dietary recommendations is is long overdue.

I am the Coordinator of the WIC Program that serves Southeast Alaska (except for Metlakatla, Alaska's sole Indian Reservation). Our program is provided through the SouthEast Alaska Regional Health Consortium and serves many women, infants and children who are Tlingit and Haida Alaska Natives. I concur with the comments you have already received from Kathleen Wayne, the Manager for the State of Alaska WIC Program.

I would also like to add a few other comments and emphasize the importance of some of the comments made by Ms. Wayne:

a.. I believe we need the flexibility to be allowed to provide limited amounts of infant formula for a motivated woman who is struggling to establish successful breastfeeding during the first month of her baby's life. There are medical reasons that can and should be considered. I agree that providing a mother an easy formula solution can often undermine breastfeeding, but there are circumstances where it is supportive to the baby while the mom and/or baby work on breastfeeding challenges. We would like to be able to continue to provide an exclusively breastfeeding package to a woman who is obviously trying hard to get breastfeeding established but who is struggling. The baby's weight gain cannot be sacrificed during this critical period.

b.. The cost of fruits and vegetables can be exorbitantly high in Alaska, especially in the rural areas. I would hope that an allowance could be made so that the voucher would allow for a small increase for states with food costs that are higher than the national average. It is wonderful that we will now be allowed to offer fruits and vegetables in some form.

c.. I concur with the State in requesting that the medical documentation requirement for children to receive soy beverages and tofu be waived. While many of our clients are lactose intolerant, many people simply prefer soy milk over cow's milk. We would like to be able to offer this choice to clients without the added administrative burden. It can

take a considerable amount of time to get the required documentation and go through the approval process for special medical foods. Soy milk and tofu should not be placed in this category.

d.. I wonder about the appropriateness of mandating only low-fat milk products for children over 2 years of age. What about the underweight child or a child who is failure to thrive? They need calories. They need full-fat milk. I would like to have the flexibility to work with the child's doctor and parents to ensure the correct foods are provided to the child. This rule inhibits our ability to use our professional judgement of what an individual needs. The local agencies need to maintain that ability to effectively serve our clients.

e.. Some of our clients will miss the number of eggs provided. This is a significant reduction.

f.. I applaud your decision to include the option of canned beans. This will help increase the consumption of this healthful food.

g.. Just so you know, very few of our clients elect to choose canned pink salmon as their fish choice.

h.. I concur that there be non-wheat cereal choices available for people who are sensitive to wheat. I applaud your decision to add other whole grain options like bread and brown rice!

i.. I do envision many families who choose to formula feed their babies will be very upset with the significant reduction in formula being offered by WIC once a baby turns 6 months old. This will be a large education challenge that will fall to the individual agencies. I agree with the decision, but the transition will be challenging. I am excited about the future of WIC. It's important that WIC's food packages be aligned with current health recommendations. This change is long overdue. I hope that USDA will be more proactive to ensure a more timely change in our food packages as health and nutrition recommendations change in the future.

Because of the delay, we need to move forward in implementing these changes as quickly as possible. Thank you for the thoughtful and thorough guidance provided in the Federal Register. We are eager to move forward on this exciting project and are with you!

Sincerely,  
Susan Hennon

From: WIC [east02@netnet.net]  
Sent: Monday, November 06, 2006 2:07 PM  
To: WICHQ-SFPD  
Subject: Comments on WIC food package rule changes

Docket ID# 0584-AD77  
WIC Food Package Rule Changes

NEW Community Clinic WIC Program East side location Green Bay, WI. 54301

We commend the USDA for the release of the proposed food package changes. It is definitely time to change the foods to be more consistent with the dietary guidelines and more culturally sensitive choices.

We support the Hunger Task Force of Milwaukee statements and concerns which we have attached in this e-mail.

We strongly support fully breastfeeding, but worry that if we do not offer formula in the first month of life as an option, it may drastically reduce the breastfeeding initiation rates. Many of our moms may be afraid to try breastfeeding in fear that they wouldn't get any formula if they weren't able to continue.

We have a concern with whole milk only for one year olds. We believe milk type for one year old should be assessed on a case to case basis by our health professionals. If we see an overweight one year old, we feel if they are eating other fat sources in their diet that there is no reason why they have to drink whole milk. In some cases, 2% milk would be more appropriate.

We also feel more incentives could be given to exclusively breastfeeding women, such as more dollars towards fruit/vegetable purchases or more FMNP dollars.

Thank you for taking the time to read our comments.

Sincerely,

The NEW Community Clinic WIC Program East side Nutritionists

LA-1179

From: Martinelli, Susan [SMartinelli@co.marin.ca.us]  
Sent: Monday, November 06, 2006 2:31 PM  
To: WICHQ-SFPD  
Subject: 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 revise the WIC Food Packages. I've worked at our local WIC agency for the past fifteen years and also as a Lactation Consultant in our local hospital and have looked forward to the day when the WIC food packages would support healthy eating and breastfeeding. On a personal note; years ago when our four children were small our family qualified for WIC but we chose not to participate because we didn't feel the foods were healthy. In the community where we live this continues to be the case. Many qualified families don't participate because the foods offered aren't acceptable to them either because they aren't culturally acceptable or because they aren't perceived as healthy.

The proposed changes with my strongest support are:

1. Provide stronger incentives for exclusive breastfeeding by not providing formula to breastfeeding infants during the first month. Most mothers requesting formula before the first month do so because breastfeeding isn't going well. Providing support for breastfeeding will help mothers and babies achieve the recommendation of 6 months of exclusive breastfeeding. Providing additional foods to breastfeeding mothers, including extra fruits and vegetables, to a equal cash value as the formula will also greatly increase the incentive to breastfeed.
2. Offer culturally acceptable alternatives to the cereals and milk. Offer only whole grains.
3. Offer the highest cash-value possible for fresh fruits and vegetables and continue to collaborate with the farmer's markets.

While these are the proposed changes that I feel can do the most good to improve the health of our participants all the proposed changes are appropriate and valuable. I look forward to these changes being made as quickly as possible to help address the obesity epidemic, increase breastfeeding rates, improve food security and encourage more eligible families to participate in WIC.

Thank you for your time and consideration.

Susan Martinelli, IBCLC  
Marin County WIC Program

Email Disclaimer: <http://www.co.marin.ca.us/nav/misc/EmailDisclaimer.cfm>

From: WebMaster@fns.usda.gov  
Sent: Monday, November 06, 2006 12:32 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Trezi Luty  
EMAIL: taluty@yahopo.com  
CITY: Yonkers  
STATE: New York  
ORGANIZATION: YONKERS WIC, Westchester County  
CATEGORY:  
OtherCategory:  
Date: November 06, 2006  
Time: 12:31:43 PM

COMMENTS:

Thank you for taking the time to make these proposals. WAY TO GO!! We surely needed the changes.

The whole grain selections are a great addition.

I feel eliminating all of the juices and upping the monies for fresh fruits and veggies would help promote the "FIVE A DAY". Up the coupons to \$8/ month and \$10 for the Exclusive BFers.

Adding the canned chicken to the protein selection is a great idea for the Exclusive BFers.

Love the idea of slowly increasing the formula and adding the jars of baby food for the infants.

All of the other revisions are great for the Exclusive BFers.

I back our BF initiative whole heartedly and feel we should not give any formula to the infants the first month (unless a RX is waranteed). This is the only way the Mom's will take the initiative to step out of their "boxes" and make the baby a priority rather than themselves. By doing this, it forces the Mom to either BF or to pay for the formula out of their own formula.

From: herkimerwic@verizon.net  
Sent: Monday, November 06, 2006 11:58 AM  
To: WICHQ-SFPD  
Subject: Docket ID Number 0584-AD77,Wic Food Packages Rule

To all it may concern:

I applaud many of the changes in the proposed WIC food packages. Adding fruits and vegetables, and decreasing juice, for example, will go a long way to help the low income families we serve to eat more nutritionally balanced meals.

However, I wish that we would re-examine our role in supplying artificial baby milk (formula) to our families. There is no medical organization that promotes artificial feeding. The AAP and WHO endorse exclusive breastfeeding. In cultures where the breastfeeding rate is 95-98% and is the cultural norm, ie. Scandanavia, the government does not supply formula. They encourage and truly support breastfeeding. Instead of giving out formula at the first sign of a breastfeeding problem, we should have intensive breastfeeding help for women during the early weeks postpartum as in the Scandanavian countries. This help, although labor intensive in the beginning, will have long term rewards and financial benefits for the country at large.

Not giving formula to the women who say they are breastfeeding will be seen as punitive to the women who really do want to do the right thing for their babies. The World Health Organization's position is that formula should be used as an emergency food only. We should only give out formula in an emergency, and then only rarely. I propose that no formula be distributed to infants at all, except in an emergency. At the very least, we should not give it out for the first month after birth to anyone.

I understand that children will need a medical diagnosis to receive tofu; the medical diagnosis should be reserved for artificial baby milk. The health and cognitive function of our future citizens is dependent on their receiving the biological norm in infant feeding- breastfeeding.

Mary Turbek, IBCLC, RN  
Internationally Certified Lactation Consultant, Registered Nurse Herkimer-Madison  
WIC Program  
401 E. German St.  
Herkimer, NY 13350  
(315) 866-5029

**email 10-20-06 from WIC Admin Seneca [WICSeneca@odh.ohio.gov]**

Nancy A. Howe  
Seneca County WIC Program  
71 S. Washington St., Suite 1102  
Tiffin, OH 44883

October 20, 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:

Seneca County WIC, in Ohio, strongly and enthusiastically supports the USDA issued proposed rule governing the WIC Food Packages published in the Federal Register on August 7, 2006. 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 it is time for the WIC Program 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 proposed rule aims to support breastfeeding for the first six months and continued breastfeeding, with appropriate complementary foods, until the infant's first birthday. I *do not support* the recommendation to pilot test the food package for the partially breastfeeding woman. With a delay in implementation of this package, I believe that

many women will simply choose to formula feed. I recommend that the fully breastfeeding, partially breastfeeding and fully formula feeding woman's food package changes be implemented concurrently.

***I would also suggest that States be given the option to provide the breastfeeding infant formula as requested by the mother. States would incorporate their option into their existing breastfeeding policies and procedures. It is very important that WIC Health Professionals be allowed to continue to provide formula to all breastfeeding women who request it. I can tell you that from my experience of working with breastfeeding WIC participants for more than 12 years, many of our participants would not attempted to breastfeed at all if they cannot have the security of having formula in their homes. Some may not tell us they are breastfeeding in order to get formula. These moms would lose out on getting assistance with breastfeeding and help with getting pumps, if needed. All of my staff understands the benefits of exclusive breastfeeding and encourage our moms to provide only their own milk for their babies. Many of our participants are so insecure in their ability to produce enough milk for their babies that they will chose not to breastfeed if they can't get formula. All the education we continue to provide cannot counteract their own insecurities and the influence of family and friends who may not have had positive breastfeeding experiences.***

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. I 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. I strongly recommend that the 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.

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 intolerance, 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. Accordingly, I urge levels of 6.25 grams of protein and 250 milligrams of potassium per 8 ounce serving as alternative minimum standards in order for WIC women and children to be able to include soy. I also urge that children be able to receive soy products without the requirement of medical documentation.

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, I 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. I have had participants with gluten intolerance who have difficult finding appropriate foods to purchase with their WIC coupons.

Seneca County WIC recognizes that implementing the proposed rule will require good planning and effective communication. Implementation strategies to maximize benefits at every level will need to be inclusive and carefully crafted to achieve success. There is great excitement and anticipation among State and local agencies regarding the changes in the WIC food package. I recommend that 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.

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.

Sincerely,

*Nancy A. Howe*

Nancy A. Howe, MS, RD, LD, IBCLC  
Seneca County WIC Director

LA-1184

From: WebMaster@fns.usda.gov  
Sent: Saturday, October 21, 2006 9:51 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Cynthia Buxton, MS RD  
EMAIL: cabuxton@cox.net  
CITY: Narragansett  
STATE: RI  
ORGANIZATION: Thundermist health Center South County  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: October 21, 2006  
Time: 09:51:04 PM

COMMENTS:

I believe the proposed changes to the WIC food package will be well received by my WIC clients and are a welcome message about good nutrition. They provide the foods we've been suggesting they increase (fruits, vegetables, and whole grains) and decrease some of the foods we've voiced concerns about (too much juice for all of them and whole milk for older children and women). Many of my clients have enjoyed the farmers market checks in the summer and have asked about fruits and vegetables in the other months. I am also happy to see the larger package provided to the exclusively breastfeeding women and infants as this sends a tangible message about the value WIC places on their choice. In addition many of our clients will be happy to see the canned beans as an option in place of dried beans (which some see as time consuming to prepare),and I think this will promote a greater use of beans. I'm excited about sharing these proposed changes with my clients and hope that some of them will share their comments with you asd well.

Sincerely,

Cynthia Buxton,MS RD

LA-1192

From: WebMaster@fns.usda.gov  
Sent: Monday, November 06, 2006 4:12 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Ana Sanders  
EMAIL: sandersa@clinicasierravista.org  
CITY: Bakersfield  
STATE: CA  
ORGANIZATION: Clinica Sierra Vista  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: November 06, 2006  
Time: 04:12:23 PM

COMMENTS:

This is my fifth year working with the WIC program. I just want to comment on how pleased I am to see the WIC Food Packages being revised. I think the front line staff in WIC do a great job teaching basic nutrition to our moms and families. It will be great to see the food packages more in line with what we teach. The addition of fruits and vegetables and the lowfat milk will be a great first step in our battle against obesity. I support the entire revised food package and I look forward to seeing the changes implemented as soon as possible.

LA-1195

From: WebMaster@fns.usda.gov  
Sent: Monday, November 06, 2006 4:03 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Kathleen Tremper  
EMAIL: mormortremper@yahoo.com  
CITY: Baltimore  
STATE: Md.  
ORGANIZATION: Johns Hopkins University WIC Program  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: November 06, 2006  
Time: 04:02:45 PM

COMMENTS:

I support the proposed changes in the Food Packages, as they adhere more closely to the IOM's recommendations. Working in the field of nutrition and offering foods that are not the most nutritious combinations has been difficult for me. I understand the concern that has been expressed over the proposal to withhold formula until one month of age for clients who identify as "partially breastfeeding". Personally and professionally, as my local agency's breastfeeding coordinator I feel that NO WIC participant should receive formula before one month of age. Although I am certain that this would not be enacted in my professional lifetime, I consider it to be "putting our money where our mouths are". Certainly exceptions could be built into the system for those situations when breastfeeding is contraindicated or impossible [HIV+ mom, adopted baby, etc.]. But some WIC clients and many health care providers put minimal effort into breastfeeding, secure in the knowledge that WIC will pick up the slack. Perhaps the knowledge that the family is fully responsible for the baby's first month of food will motivate more mothers to initiate breastfeeding and those who do to work a little harder at it. More importantly, the medical community may be a little less cavalier about perinatal practices which actively undermine breastfeeding. Instead of viewing this policy as a "punishment" for partially breastfeeding moms, we could view as policy that promotes and supports breastfeeding for all families. In practice, it would require that most families would wait only one to two weeks from WIC appointment to start date of formula checks, as most infants are already two to three weeks old at the time of WIC enrollment. It might even encourage families to stay home and recover longer before rushing to WIC to get the baby's formula. I find that most of our clients manage not just well but often extravagantly in these first weeks, often buying expensive ready-to-feed preparations of formula. Kudos on the proposed changes and hopefully my comments will serve as f

From: Erin Keane [erin.m.keane@gmail.com]  
Sent: Monday, November 06, 2006 4:12 PM  
To: WICHQ-SFPD  
Subject: WIC Food Packages Rule, Docket ID Number 0584-AD77

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

Dear Ms. Daniels:

As a Dietetic Intern assigned to the Tompkins County WIC program, I strongly support the WIC Food Packages Proposed Rule and the U.S. Department of Agriculture's (USDA) efforts to better align the food packages with the Dietary Guidelines for Americans.

It has been my experience that WIC food packages have the potential to strongly influence what these low-income individuals provide for their families. In my personal research and in talking with clients, I have found that the cost of fresh fruits and vegetables and whole wheat items is one of the major factors that deter WIC clients from consuming them. One woman I spoke to claimed that "all healthy food is expensive, and all unhealthy food is cheap". I feel that along with continued education, the new changes in the food packages will allow individuals to see that providing more healthful options to their family is not as difficult as they think.

Thus, I feel the changes suggested in the WIC Food Packages Proposed Rule are extremely relevant and important to the WIC population. As USDA finalizes the regulations, please consider the following suggestions to further strengthen the final rule.

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

In addition, I recommend limiting sodium in canned or frozen vegetables to no more than 480 mg per serving (the disqualifying level for the Food and Drug Administration's [FDA] "healthy" claim). And I strongly support the proposed rule on the elimination of fruit juice for infants and decreases in the quantity of juice for children and women in the food packages.

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

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Bringing the quantity of milk in the WIC food packages in line with the Dietary Guidelines is another important recommendation in the proposed rule. However, I recommend that USDA require that all milk in the food packages for children ages 2 to 4 years and women be low-fat (1%) or fat-free (skim), to reflect the recommendations in the Dietary Guidelines and to help to reduce saturated fat intake and the risk of heart disease. I agree with the proposed rule regarding allowing soy-based beverages and calcium-set tofu as substitutes for milk in Food Package IV, V, VI, and VII.

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

I strongly agree with USDA's proposed revisions to the WIC food packages to provide greater incentive for breastfeeding. Also, I support the proposed rule's inclusion of a greater variety of options throughout the food packages to promote greater acceptability of WIC foods by participants.

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

Sincerely,

Erin Keane

Tompkins County WIC Dietetic Intern  
Tompkins County WIC  
401 Dates Drive  
Ithaca, NY 14850  
(607) 274-6630

LA-1197

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From: Judith M. Khanuja [jmkhanuja@northwic.org]  
Sent: Monday, November 06, 2006 4:23 PM  
To: WICHQ-SFPD  
Subject: Food Packages Rule

I am in favor of the changes in the food package recommendations. I have been on the committee locally and look forward to providing the food items to help the needy families of Philadelphia.

Sincerely,  
Judith M. Khanuja  
Nutrition Education Coordinator  
NORTH, Inc. - WIC Program  
642 N. Broad St., Suite 101  
Philadelphia, PA 19130  
(215) 978-6100 Ext. 19

LA-1198

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From: WebMaster@fns.usda.gov  
Sent: Monday, October 23, 2006 6:11 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Jeanne Ritter  
EMAIL: jeanne.ritter@renogov.org  
CITY: Hutchinson  
STATE: KS  
ORGANIZATION: Reno County Health Department  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: October 23, 2006  
Time: 06:11:18 PM

COMMENTS:

As a WIC dietitian, I support the following proposed changes in the WIC food packages:

- reduction in juice
- inclusion of whole grains
- addition of fruits and vegetables
- reduction in milk and cheese
- elimination of juice for infants
- elimination of whole milk for participants 2 years old and older -inclusion of canned legumes as an alternative to dried legumes.

Although calcium is an essential mineral, in my experience there are occasions when an excessive amount of milk and/or cheese is available to some participants.

I feel that these changes combined with the education that the WIC program provides will promote positive eating habits that could last a lifetime.

LA-1199

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From: WIC Admin Coshocton [WICCoshocton@odh.ohio.gov]  
Sent: Tuesday, October 24, 2006 11:30 AM  
To: WICHQ-SFPD  
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule,"

To Whom It May Concern:

I am the Director of the Coshocton County WIC Program located in Coshocton Ohio. I am writing in regards to the proposed changes to the WIC food packages. I am very concerned that the proposal to deny formula for fully or partially breastfed infants during the first month may cause WIC mothers to choose not to breastfeed at all for fear that they could not received formula in the event of a problem. Many new and/or young moms are insecure about their ability to breastfeed. Having a backup feeding method often provides the confidence to at least try.

The proposed change will have a negative impact on the number of WIC women choosing breastfeeding. Please reconsider.

Willa Hamersley  
WIC Director

LA-1201

From: Petersburg WIC [petersburgwic@wvdhhr.org]  
Sent: Tuesday, October 24, 2006 9:38 AM  
To: WICHQ-SFPD  
Subject: Docket ID 0584-AD77 WIC Food package Rule

Due to the changes in the formula allowance for breastfed babies, our staff believes that some participants will not admit to breastfeeding( "closet breastfeeders" ) to leave the option open to receive formula in the early months. Many women are willing to try breastfeeding when they find out they can do both bottle and breast. This won't be good for breastfeeding rates.

Trish Halterman, MS, RD  
Nutritionist/BF Coordinator  
Randolph-Elkins Health Dept.

Petersburg WIC  
PO Box 157  
Petersburg WV 26847  
(304) 257-4936 Phone  
(304) 257-2034 Fax

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LA-1203

From: WebMaster@fns.usda.gov  
Sent: Monday, November 06, 2006 5:06 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Rochelle Kieborz  
EMAIL: rkieborz@cdhd.ne.gov  
CITY: Grand Island  
STATE: NE  
ORGANIZATION: Central District Health Dept. WIC Program  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: November 06, 2006  
Time: 05:06:06 PM

COMMENTS:

I support the addition of fruits & vegetables to the food package. I would like to urge flexibility for WIC State Agencies in choosing the form in which fruits & vegetables will be provided. I support the addition of infant food fruits & vegetables & the elimination of juice from the infant food packages. I would like to recommend that the dollar denomination of the fruit & vegetable cash-value vouchers & the minimum vendor stocking requirements for fruits & vegetables be determined at the discretion of the State WIC Agencies.

States should be given the option to allow white potatoes as an acceptable fresh vegetable. White potatoes are the only vegetable excluded; this single exclusion could cause confusion for WIC participants and vendors. This vegetable provides a source of Vit. C, potassium and fiber in the diet and is low in cost. Through nutrition education at our WIC clinics we would encourage low fat methods of preparation of this vegetable.

I support the provision of soy based beverages for participants who do not tolerate cow's milk. I request that those participants be allowed to receive soy based beverages without the proposed requirement of medical documentation which is burdensome to all involved: participants, medical personnel & staff.

The proposed rule allows the state agency to authorize farmers at farmer's markets to accept the WIC cash-value food instrument for fruits and vegetables. I would suggest the rule be revised to allow only state agencies operating the WIC Farmers Mkt. Nutrition Program the option of authorizing farmers at farmers' mkt. to accept WIC cash-value

food instruments. Authorizing farmers markets outside of the FMNP would create an administrative burden on state agencies not operating the FMNP by increasing administrative time required to authorize additional vendors. Implementation of some of the vendor authorization requirements and the cost containment requirements would be difficult, specifically, requirements for 1) minimum variety & quantity of supplements foods-states requiring all vendors to meet a requirement for stocking a variety of all types of foods; 2) competitive price criteria & peer groupings; 3) meeting the above 50% criterion-states would need to collect & review additional information from farmers markets to implement this criteria.

Please consider the special needs of infants who need human milk fortifier until breastfeeding is fully established in the first month of life. These infants would be categorized as fully formula fed infants and could result in inaccurate breastfeeding statistics.

I would recommend that states be allowed a longer implementation period for the rule than one year. A period of up to 3 years would be recommended. The rule impacts many areas of program operations from design of food packages to bank processing. Implementation of the changes will necessitate modifications to the computer systems, program staff education, client education and focus, retailer selection criteria, retailer agreements, retailer training programs, food delivery system, and banking contracts. Sufficient time needs to be given to states so that changes can be coordinated at all levels of the program to achieve an effective and efficient implementation of the rule. It would be best if changes could be made to current systems as systems are modified and/or contracts renewed. This would provide for a more cost effective implementation plan.

I would like to see a provision in the final rule for State Agencies to include gluten-free cereal options. This would accommodate the medical needs of certain participants.

The proposed methodology for rounding of formula is complicated, creates confusion for participants and staff regarding the number of cans of formula participants will receive each month. I would suggest the current method of rounding provided in the federal regulations be retained in place of the proposed methodology. I would also suggest the current method of rounding be applied to all formulas issued including non-contract and exempt formulas at the option of State Agencies.

LA-1204

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From: William Ruth [bruth@mercedcaa.org]  
Sent: Monday, November 06, 2006 5:34 PM  
To: WICHQ-SFPD  
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Dear USDA:

I am the Program Director of the Merced County Community Action Agency WIC Program. I am extremely please with the proposed changes to the WIC Food Packages. As a WIC Director, I am very concerned with the high rate of obesity and Diabetes in Merced County. The proposed changes of the inclusion of fruits and vegetables will help our program to be even more effective in lowering the instances of these diseases.

Our WIC program was a co-sponsor for a food summit held last month, we were proud to mention the proposed changes to the food package as a means to fight against obesity and diabetes but also a way to build relationships with local farmers to make fruits and vegetables more available to our participants.

I see the proposed changes as a "win-win" proposal for us and our participants. It is a good first step. Hopefully, more changes will be forthcoming.

Thank you for giving me the opportunity to comment.

William H. Ruth  
Program Director  
Merced County Community Action Agency  
WIC Program  
209-383-4859 (Office)  
(209) 383-0366 (Fax)  
(209)777-8956 (Mobile)  
bill@mercedcaa.org

From: Ed & Karen Cutler [enkcutler@gci.net]  
Sent: Monday, November 06, 2006 4:48 PM  
To: WICHQ-SFPD  
Subject: comments on new food package

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

Thank you for your consideration of making food changes to the WIC Food Package. As a WIC Registered Dietitian working in WIC for 15 years, I urge you to consider and adopt the following IOM recommendations:

Adding

Fruits and vegetables – they provide increase in fiber and will help decrease obesity

Soy products (soy milk/tofu) – many of our populations have lactose intolerance, and for people with milk allergies this will be very beneficial

Whole grains – fiber will promote healthy gastrointestinal function (increasing absorption of important nutrients) and decrease obesity

Canned beans – they will increase the number of people who use this healthy food

Decreasing/removing

Milk – many of our children drink excessive amounts of milk, or use a milk bottle for much longer than recommended

Juice – the current amount of juice provided by WIC is excessive, and contributes to obesity, dental problems and decreases needed water and/or fruit consumption

All juice for infants – high juice intake make contribute to obesity for these children

Additional recommendations

Adding

Choice of either baby cereal or adult cereal for infants 10 to 12 months – many babies no longer eat (or eat limited amounts) baby cereal at this time

Additional recommendations

Providing medical necessity for soy products will promote additional expense for people  
who need it most – many of the people who have this need are people from other countries where they do not drink cow's milk (these clients are more likely to lack the funds necessary to obtain this medical documentation). This also forces participants to pay for medical services to obtain WIC benefits - which is in direct opposition to the WIC regulation that participant not be required to pay money to receive WIC services.

Federally set price limits on fruits and vegetables are inappropriate for Alaska. Our produce costs are much higher than the continental US, due to costs of trucking food to Seattle, barging food to Anchorage, and then either trucking food to urban stores or flying food to rural villages (the majority of the state), then transporting by snowmachine or 4-wheeler to the store [in the winter sub-zero temperatures, fresh fruits and vegetables often freeze between the plane and the store]. Alaska (and other non-continental areas) should be able to set their own price limits.

Amounts of infant formula should follow a more regular pattern than 6 cans this month, 7 cans next month, 6 cans the month after that. I agree with the State of Alaska's position that formula amounts should be rounded up, or a lower amount for the first months, and more later.

Non-wheat forms of cereal (single grain corn and rice cereals) should be allowed on WIC, even if only for participants with a wheat allergy.

USDA is to be applauded for making these important changes to the WIC food package. These changes will improve the health of many WIC participants as well as support VENA (Value Enhanced Nutrition Assessment) initiatives promoting HEALTH rather than only a few individual nutrients.

Thank you,

Karen Cutler, RD  
WIC Assistant Coordinator  
Anchorage Neighborhood Health Center  
(907) 257-4633

From: WebMaster@fns.usda.gov  
Sent: Monday, November 06, 2006 4:59 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Christine Scharpenberg  
EMAIL: cscharpenberg@co.kittitas.wa.us  
CITY: Ellensburg  
STATE: Washington  
ORGANIZATION: Kittitas County Public Health Dept  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: November 06, 2006  
Time: 04:58:47 PM

COMMENTS:

Our staff at our local WIC program agree with Janet Jackson Charles, Director of the Washington State Nutrition program. We strongly agree with including yogurt as a dairy altertative: decreasing juice in the infant food package; adding fruits and yegitables to the food packages. We disagree with having to have a perscription for soy-based becerage. We reccomend caution against lowering infant formula allotment as this may be their only source of receiving infant formula.

From: WebMaster@fns.usda.gov  
Sent: Monday, November 06, 2006 5:02 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Carolyn Roberts  
EMAIL: Carolyn.Roberts@state.tn.us or roberts7570@bellsouth.net  
CITY: work in Morristown, TN and live in Bulls Gap, TN  
STATE: Tennessee  
ORGANIZATION: Nutrition Educator in Hamblen County Health Dept.  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: November 06, 2006  
Time: 05:01:30 PM

COMMENTS:

Medical and nutritional recommendations to eat more vegetables, fruits, and whole grains need to be reinforced by the foods provided on the program. Some participants ask why we don't include fruits and veggies in the food package. Americans drink too many calories. Juice can safely be reduced or even eliminated if the food is offered, with a lot more satisfaction from the chewing, bulk, and fiber.

At this time, I think canned beans are a reasonable alternative to dry beans. This is not much 'luxury' for a mother caring for children, working outside of home, often with no support nor help.

I heartily support soy alternatives for dairy foods. Many participant families have requested this, based on individual need and medical recommendations.

I would love to see equal or greater amounts of money spent for every "exclusively Breast Fed" infant as is spent for formula. It seems to me there would be much greater incentive for mothers to B.F. as well as much greater financial savings for the country in terms of greater learning potention for baby, less medical care and prescription cost and fewer lost work days of parent(s); and that doesn't consider the reduced risk and costs of cancer occurrences and treatment for mother. Breastfeeding needs even more support due to the long-term benefits of reduced risks for OBESITY, DIABETES, cancer, and cardiovascular disease. What would that save this nation over the lifetime of the next generation?

Thank you for this opportunity for comment.

From: Anita Speese [aspeese@dhd10.org]  
Sent: Tuesday, October 24, 2006 2:21 PM  
To: Carra@michigan.gov; Daly-KozielK@michigan.gov  
Cc: WICHO-SFPD@fns.usda.gov  
Subject: Proposed Food Pkg. Changes

RE: "Docket ID Number 0584-AD77, WIC Food Package Rule I've worked for WIC for over 22 years, and I was very excited to hear about the proposed changes in the food package. Most were good.

I do have some concerns about a few of the changes:

1. The issue of giving no formula in the first month for a baby who's considered breastfeeding.

I'm sure this was intended to be supportive of breastfeeding, but I believe it would backfire and more women would just say they're formula feeding. A lot of women are insecure about breastfeeding and having enough milk in that early time. At least in our area, I think they would be afraid they wouldn't have the formula if they needed it. I support the NWA position of dysrdr nrinh given the option to provide the breastfeeding in the the first month with either 1) no formula or 2) one can of powdered formula as recommended in the IOM Report. The 1 can choice should never be an "automatic" option.

2. Soy milk. I think this should be allowed without a prescription.

3. Amount of formula given to infants:

I believe the amount of formula WIC gives to a newborn is too much. WIC is a supplemental program and that should always be stressed. 9 cans of formula is more than most newborns need to supply their total needs until they're over 10 pounds.

If the amount given to a newborn was 4 cans/month, then it would be more like a "supplemental" program. The 9 cans given to the newborn encourages over-feeding and participants also think they should get more as the baby gets bigger. Most of our truly needy clients also receive food stamps that increase when they have a baby -- to provide for formula.

Cutting the amount of formula given to a newborn would help neutralize the cost factor involved with the other food package changes, may encourage more women to consider breastfeeding, and lessen the sense of "entitlement" that seems to have grown concerning formula over the past years.

Also, this comment is not about the food package, but I wanted to share it.

I think since WIC and DHS use different criteria to determine income, we should not automatically consider a person income eligible if they have Medicaid. If a couple is living together, but not married, the boyfriend's income is not included by DHS. She gets Medicaid based on her income alone. She can then come to WIC and be considered

~~income eligible, even though their total household income exceeds the WIC guidelines.~~

To me, this seems unfair and discriminates against a married couple. More and more couples are choosing to live together without being married. I think programs like Medicaid, Food Stamps, and WIC should all use the same rules to determine income. WIC's guidelines include a lot of detail, but they seem fair.

I wrote to Governor Granholm about this issue and was told Michigan's rules are based on federal law. I wrote to President Bush and got no response. If it's unlikely that Medicaid rules will change, maybe WIC rules should change.

Thank you for taking the time to consider these comments.

Anita Speese

District Health Dept. #10

PO Box 850, White Cloud, MI 49349

aspeese@dhd10.org

From: WebMaster@fns.usda.gov  
Sent: Wednesday, October 25, 2006 4:05 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Linda Franklin  
EMAIL: Linda.Franklin@acgov.org  
CITY: Oakland  
STATE: CA  
ORGANIZATION: Alameda County WIC Program  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: October 25, 2006  
Time: 04:04:50 PM

COMMENTS:

I applaud the proposed changes and encourage you to implement them promptly. Our clients have been asking for these changes for decades, and many people have not participated because the core WIC foods were things they did not or were not able to consume. Clients especially want fruits and vegetables and alternatives to dairy like soy products and yogurt. It will be rewarding to nutrition professionals in our program to have a food package that is aligned with the current thinking in nutrition education. We won't have to defend ourselves against medical providers complaints that the food package is too high in fat and contains excessive juice and milk. It's time for a change... please implement now!

From: WebMaster@fns.usda.gov  
Sent: Wednesday, October 25, 2006 4:52 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Mary Schwietz MPH, RD, WIC Director  
EMAIL: mschwietz@co.boulder.co.us  
CITY: Boulder  
STATE: CO  
ORGANIZATION: Boulder County Public Health  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: October 25, 2006  
Time: 04:52:28 PM

COMMENTS:

I strongly support the Proposed Rule for changes to the WIC food package. It is essential that WIC reflects the most current knowledge available in nutrition science and that we support the health and well-being of our clients to the greatest extent possible. A few minor suggestions for changes that I'd like to add are as follows:

- \* allow infant jarred foods only until 9 months of age
- \* allow whole milk for children over 2 years of age under special circumstances such as failure to maintain growth curve, special needs etc...

Thank you for consideration of these comments.

Mary Schwietz

LA=1213

From: Mortell, Tricia [Tricia.Mortell@clark.wa.gov]  
Sent: Wednesday, October 25, 2006 5:12 PM  
To: WICHQ-SFPD  
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Attachments: Food package support letter.doc

October 19, 2006

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

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

Dear Ms. Daniels:

Clark County Public Health WIC program supports the USDA issued proposed rule governing the WIC Food Packages published in the Federal Register on August 7, 2006.

These revisions could lead to even better health for all of our participants by offering greater flexibility to meet participants' cultural food preferences and practices. A one size fits all approach to nutrition and food is not appropriate in our communities today, as food preferences and habits are learned at an early age and at the family table.

We have been anxiously awaiting the proposal which reflects recommendations made by the Institute of Medicine (IOM) of the National Academies in its report, "WIC Food Packages: Time for a Change." This report, 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, was an excellent document leading to a comprehensive review of how we can improve the food package while preserving cost neutrality.

Our agency is not in support of 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.

To further support breastfeeding without undue hardship to our families we are in support of an option to provide the breastfeeding infant, in the first month, with either no formula, or one can of powdered formula as recommended in the IOM Report. States would incorporate their option into their existing breastfeeding policies and procedures. To provide further support for fully breastfeeding women, we would ask that the coupons for fresh fruits and vegetables be increased to \$10, also as suggested in the IOM report.

Because of the variations in WIC systems and available choices throughout the states, it is recommend that the 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.

To support local and regional food systems, we would strongly encourage the purchase of U.S. grown fruits and vegetables only with WIC checks.

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.

The addition of calcium-set tofu as well as calcium- and vitamin D-rich soy beverages will be particularly beneficial to WIC participants who suffer the medical consequences of milk protein allergy and lactose maldigestion. Additionally, these choices are more culturally acceptable for some families in our community. Reportedly, there are no calcium-fortified soy-based beverages on the market that meet the proposed protein and potassium standards so we would recommend adjustments to these standards. It is also unreasonable to ask those requiring or preferring these products to seek medical documentation to be able to purchase them.

Although local and state agencies are very enthusiastic about these proposed changes, it is clear some changes will be more difficult to implement than others. We would recommend that USDA partner with State agencies and the National WIC Association to assure a reasonable and flexible implementation timeframe not to exceed two years from date of final rule publication.

WIC is our nation's premier public health nutrition program. The long-term benefits of providing participants with fruits and vegetables, culturally appropriate food choices,

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 applaud USDA efforts and encourage finalization of the rule by no later than the spring of 2007.

Tricia Mortell  
Program Manager  
Nutrition and Family Wellness  
Clark County Public Health  
PO Box 9825  
Vancouver, WA 98666  
360-397-8000 Ext 7211  
Public Health: Always working for a safer and healthier community

LA-1214

Docket ID Number 0584-AD77, WIC Food Packages Rule  
From: Fritz, Bonnie [Bonnie.Fritz@METROK.C.GOV]  
Sent: Wednesday, October 25, 2006 6:28 PM  
To: WICHQ-SFPD  
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

As a dietitian for the WIC program for 12 years in 3 different states (UT, AK & WA), I applaud the proposed changes to the WIC food package. The WIC foods are appreciated by our families and unfortunately for many, are essential and not supplemental to their groceries purchased. Decreasing juice and adding fresh fruits & veggies will be super; adding soy products for lactose intolerant participants is overdue. We will be more able to "practice what we preach" because clients will be able to choose these products with their WIC package. Canned beans allow clients who have limited kitchen facilities to make a healthier choice than peanut butter (and face it, they're easier!) Overall, this package reflects a more well balanced diet and offers more choices which reflects the variety of cultures that we serve.

Thank you,  
Bonnie Fritz, RD  
Seattle, WA

LA-1216

From: WebMaster@fns.usda.gov  
Sent: Thursday, October 26, 2006 1:50 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Barb Eggleston  
EMAIL: beggleston@co.boulder.co.us  
CITY: Lafayette  
STATE: CO  
ORGANIZATION: Boulder County Public Health  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: October 26, 2006  
Time: 01:50:04 PM

COMMENTS:

I highly support changes. I hope that the calcium fortified juices will be allowed since numerous woman do not drink milk. It is great to no longer give juice to infants. I'm happy that whole grains have increased and much diversity in choice. I applaud dollars for f & v's.

LA-1217

From: WebMaster@fns.usda.gov  
Sent: Thursday, October 26, 2006 6:02 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Michelle Hagan  
EMAIL: PNMHAGAN@aol.com  
CITY: Spokane  
STATE: WA  
ORGANIZATION: Spokane Regional Health District WIC Program  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: October 26, 2006  
Time: 06:01:33 PM

COMMENTS:

1. The timeframe for implementation needs to be extended to three years to allow for adequate training and an efficient and consistent implementation.
2. The FNS needs to move forward with these food changes regardless of cost neutrality.
3. A mother shouldn't have to choose between breastfeeding and formula feeding that first month of life. Our WIC agencies promote breastfeeding but also respect a mother's right to choose how she would like to feed her baby. Furthermore, if a mom wants some formula, she will just choose the formula feeding option. The CPA should be allowed to tailor the food package to meet the infants needs during the first month of life. Additionally, I oppose the piloting the partially breastfeeding food package and encourage implementation of the three breastfeeding/formula feeding food package concurrently.
4. I support the three feeding option for ages 2-5 months, but I would like to have the CPA be allowed to tailor the infant formula package during the first month of life.
5. Infant formula and infant foods should be rounded up or down and given at the same level each month.
6. The consumption of soy foods may be a cultural/personal request and to distribute these foods on WIC should not be based solely on medical need. I oppose the requirement that WIC staff receive medical documentation prior to provide food packages containing soy. It is medically unnecessary, costly, and a burden to our WIC staff and clients.
7. FNS needs to grant state agencies the permission to determine the dollar denominations for the cash value of fruits and vegetables on the food instruments. This will allow cost effective implementation.

8. Excluding white potatoes is ridiculous. Under the ADA guidelines, all foods have a place in our diet and the fruit and vegetable campaigns encourage consumer to "Eat the Rainbow" and excluding one vegetable over others with similar nutrient content (such as bananas, parsnips, and turnips) makes WIC look uneducated about our nutrition priorities. White potatoes are nutritionally sound and should be included.

9. Farmer's Markets need to be allowed to participate in the redemption of the cash value voucher program. Farmer's Markets are integral to our economic and nutritional system and allow our WIC clients access to a great variety of fruits and vegetable grown locally thus supporting sustainable agriculture.

10. WIC clients should be allowed to pay out of pocket the cash value difference between their purchase and their WIC allotment. This limitation will only cause confusion and a lack of participation with the new fruit and vegetable options.

11. WIC is a preventative health program focused on primary prevention, not disease treatment. Medical foods should be limited to pediatric formulas which are nutrient dense beyond one year of age (e.g. Pediasure, Kindercal, Resource.) 12. I support the food package changes in food package II. However, I feel that the amounts of infant cereal should be reduced and certain adult cereals that are appropriate for developmentally ready infants should be added.

13. Infant fruits and vegetables, as well as bananas, should be added to the food package II.

14. The FNS needs to expand the list to include fresh, frozen or other canned fruits and vegetables. This will support parents with texture progression and well as appropriate feeding skill development in infants.

15. I oppose requiring medical prescriptions for non dairy sources of calcium and additional cheese in foods package IV - VII.

16. I support not allowing low iron formulas on WIC.

17. FNS should allow yogurt to replace quarts of milk on WIC. Yogurt is a culturally acceptable food and is less costly than Lactaid milk which is currently allowed on WIC.

18. FNS needs to establish minimum nutrient content standards for soy beverages that should be at 6.25 g minimum for protein and 250 mg per 8 oz for potassium.

19. I support the clarification that state agencies wouldn't require verification of vitamin C content for 100% citrus juices.

20. Although the emphasis is on whole grain consumption, WIC still needs to include single grain corn and rice cereals for our clients with special conditions such as a wheat allergy or gluten intolerance. However, these cereals should be allowed for all WIC clients to avoid confusion in the grocery stores and WIC offices.

21. Breastfeeding should be considered a cost-containment issue and the cost savings in states with higher breastfeeding rates should allow for conversion of food fund savings to NSA.

22. FNS needs to revise Participant Violations and sanctions as well as Claims against Participants working in support of group-based food delivery systems. Regulations need to address "caregivers" instead of "participants" when dealing with violations, sanctions, and claims. Participant wording could disqualify innocent infants and children from the program due to caregiver's actions.

23. FNS needs to clearly clarify ages such as "Infants from the first day of their 6th month through the last day of their 11th month."

LA=1219

From: WebMaster@fns.usda.gov  
Sent: Thursday, October 26, 2006 4:07 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: michele ordonez  
EMAIL: mordonez@co.boulder.co.us  
CITY: Lafayette  
STATE: colorado  
ORGANIZATION: Family Health  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: October 26, 2006  
Time: 04:07:28 PM

COMMENTS:

I know that a lot of clients would like to see organic. Alot of stores have their own a organic srbrands now. I like the less juice and fruits and vegs.

LA-1221

From: Paula Occiano [paula.occiano@SDARC.org]  
Sent: Thursday, October 26, 2006 7:10 PM  
To: WICHQ-SFPD  
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

To Whom It May Concern:

I just wanted to voice my opinion on the proposed WIC food package changes. I think it's great that after so many years of knowing that fruits and vegetables are great for everyone that we're finally making a change towards practicing what we preach. Cutting down on the amount of juice in the packages will help greatly in our quest to decrease juice intake and increase fruit and vegetable consumption. I am also very pleased to see whole grain breads and corn tortillas being offered. It will make an amazing impact on the health of our participants and make it easier for our participants to grasp the concept of eating healthy. Thank you for your time.

Paula Occiano, CLE  
Assistant Manager  
Women, Infants & Children (WIC) Program  
+American Red Cross  
San Diego/Imperial Counties Chapter  
8810 Jamacha Blvd.  
Spring Valley, CA 91977  
Main line: (800) 500-6411  
Phone: (619) 337-1389  
Fax: (619) 337-1393

October is Fire Safety Month. According to a recent poll by the Red Cross, 4 out of 5 Americans are unaware that home fires are the most common disaster in the United States, and only 26 percent of families have actually developed and practiced a home fire escape plan. Since fires kill more Americans each year than all natural disasters combined, the Red Cross urges families to develop a fire escape plan, build a disaster kit, and become informed about fire prevention and safety. For more information about protecting your home and family from fires, visit [www.sdarc.org](http://www.sdarc.org).

LA-1222

From: WebMaster@fns.usda.gov  
Sent: Thursday, October 26, 2006 11:49 AM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Joy A Hunter RD, LD, CLE  
EMAIL: joyh@state.ut.us  
CITY: Provo  
STATE: Utah  
ORGANIZATION: WIC  
CATEGORY: WICLocalAgency  
OtherCategory: WIC Clinic Director  
Date: October 26, 2006  
Time: 11:49:21 AM

COMMENTS:

I heartily support the recommended changes to the current WIC food packages. It would impact positively most of the clients we serve in Utah. It would offer more selections for our large culturally diverse clientele. Daily I receive queries into why we can't offer fruits and vegetables, especially since we promote their great nutritional value. Many mom's are hoping for soy products due to milk intolerances in their children. Many other reasons besides these support the proposed changes.

LA-1223

From: WebMaster@fns.usda.gov  
Sent: Thursday, October 26, 2006 3:55 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Pat Rion  
EMAIL: prion@crawfordcohd.org  
CITY: Pittsburg  
STATE: KS  
ORGANIZATION: Crawford County Health Department  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: October 26, 2006  
Time: 03:55:22 PM

COMMENTS:

I think it is GREAT! Finally adding fruits, vegetables, whole grains and even soy products. We are going to actually be giving healthier life styles to the ones who need it most. Chalk one up to the "warrior" nutrition in the battle of the bulge!

From: Maryann Miernicki [maryann.miernicki@SDARC.org]  
Sent: Thursday, October 26, 2006 6:15 PM  
To: WICHQ-SFPD  
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Thank you for the opportunity to comment on the proposed WIC Food Packages Rule.

One thing I VEHEMENTLY DISAGREE with is:

Offering infant jar foods. We encourage participants to make their own baby food, as a cost-saving measure. This REALLY sends a message to participants that they should be buying jar foods. If we give them jar foods and tell them to make their own, we are sending a mixed message, and, our actions will speak louder than our words. Instead of the jar foods, I would like to see infants also getting a fruit and vegetable \$ allowance, with exclusively breastfeeding babies getting a larger amount. I doubt that any exclusively breastfeeding mom would buy her baby jar meats – I didn't and I wouldn't recommend it. It makes us look like we are being bribed by the infant food companies.

The things I DISAGREE with are:

1. 2 % milk as an option for 2 year+ children and women. We work very hard to inform participants that the appropriate milk choices are 1% or nonfat. Offering 2% sabotages our efforts.
2. Eliminating yogurt as milk substitute. It is a well-accepted food culturally, even more so than tofu.
3. Offering \$2 less than the IOM recommendation for fruits and vegetables.
4. Setting a vendor stocking level of fruits and vegetables at 2 – this is not enough to promote the variety we teach participants about.
5. Having standards for the protein and potassium content of soy beverages that no current soy-based beverages contain. I would like to see the minimum standard be 6.25 gm protein and 250 mg potassium.
6. Having a 1-3 year pilot study on the partially breastfeeding package. Let's just get started!
7. Soy beverages for children requiring a physician note. This puts an unnecessary burden on participants who often have difficulties scheduling doctor appointments. The Registered Dietitian (RD) should be able to make this decision with the participant.

8. Physician identification of appropriate foods for children on therapeutic formulas. The RD should be able to make this decision.

The things I LOVE about the proposal are:

1. Inclusion of canned beans as an option
2. Inclusion of salmon as an option
3. Other whole grain options
4. Fruit and vegetables will be options and that the options are varied (fresh, frozen, canned and dried).
5. Cereal will be offered to infants starting at 6 months.
6. Eliminating juice for infants.

Maryann K. Miernicki, RD, CLE  
American Red Cross WIC Program  
3950 Calle Fortunada  
San Diego, CA 92123  
858-309-1448  
Fax: 858-309-1286  
maryann.miernicki@sdark.org

Babies were born to breastfeed!

October is Fire Safety Month. According to a recent poll by the Red Cross, 4 out of 5 Americans are unaware that home fires are the most common disaster in the United States, and only 26 percent of families have actually developed and practiced a home fire escape plan. Since fires kill more Americans each year than all natural disasters combined, the Red Cross urges families to develop a fire escape plan, build a disaster kit, and become informed about fire prevention and safety. For more information about protecting your home and family from fires, visit [www.sdark.org](http://www.sdark.org).

LA-1225

From: Valentine Sworts [VSWORTS@co.lewis-clark.mt.us]  
Sent: Thursday, October 26, 2006 2:53 PM  
To: WICHQ-SFPD  
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Hello.

I would like to comment on the WIC Food Packages Rule.

I recommend that the proposed jarred infant food be replaced with fresh, frozen, or canned fruits and vegetables for infants.

I am recommending this because:

- \* Infant jarred food is marketed to increase consumption of packaged toddler products.
- \* Jarred infant food averages six times the price of pureed whole food such as unsweetened applesauce and mashed carrots.
- \* The proposed single ingredient jarred food is usually shelved with numerous undesirable infant choices: jarred desserts, "infant juices", and infant sipper cups.
- \* Walmart, the predominant WIC retailer, shelves infant food alongside undesirable packaged "Graduate" toddler foods, which are becoming a common component of WIC participants' diets.

I appreciate the opportunity to comment.

Thanks,

Valentine D. Sworts  
Lewis and Clark City-County Health Department Helena, Montana 59601

LA-1227

From: WebMaster@fns.usda.gov

Sent: Monday, November 06, 2006 6:07 PM

To: WICHQ-SFPD

Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Marilyn Walton  
EMAIL: marilyn@state.ut.us  
CITY: Orem  
STATE: Utah  
ORGANIZATION: Utah County Health Department WIC  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: November 06, 2006  
Time: 06:07:20 PM

COMMENTS:

I see a real need for the milk substitutions of soy milk and tofu. I also see a need for fruits and vegetables for women and children, and baby food for infants. The decreased juice is also good. I have some concerns for decreased formula for breastfeeding women, feeling that many will totally stop breastfeeding if their only option is half formula and breastfeeding or full formula and not breastfeeding.

LA-1228

From: WebMaster@fns.usda.gov  
Sent: Monday, November 06, 2006 6:16 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Carolyn Walker  
EMAIL: calowyn@hotmail.com  
CITY: Provo  
STATE: Utah  
ORGANIZATION: Utah County Health Department  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: November 06, 2006  
Time: 06:15:37 PM

COMMENTS:

I commend USDA for the work that has been done so far to change the WIC food packages. I believe a change is long overdue as nutrition needs have changed a lot over the past several years. I fully support all of the proposed changes that have been made to the women and children packages. I especially agree with the proposed changes to allow the purchase of fruits and vegetables, decrease the amount of fruit juice offered and allow the purchase of soy milk and tofu as an alternative to cow's milk. I see clients who want soy milk almost on a daily basis. In many cases children's calcium intake is compromised because WIC does not offer this option.

My major concern is with the proposed rules about infant formula. I am concerned that by asking a mom to decide in the first month between exclusively breastfeeding or exclusively formula feeding that it will discourage moms from breastfeeding who wish to also give formula. I am also concerned that by limiting the maximum amount of formula for partially breastfed babies over one month that moms will stop breastfeeding due to the additional expense if their baby takes more formula than what we offer. I do, however, believe that if we are issuing the maximum amount of formula (generally 9 powdered cans in Utah) the partially breastfeeding mother does not need additional WIC foods. If the baby is taking this much formula, the mother is rarely breastfeeding enough to severely compromise her nutrition status. In order to cut costs I think it is prudent to give the full formula package to partially breastfed infants who need it, but then not allow the mom to receive WIC benefits for herself.

Overall I am very impressed with the proposed changes and will be anxiously awaiting the final word.

LA-1229

From: no-reply@erulemaking.net  
Sent: Tuesday, October 31, 2006 9:20 AM  
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: Trish  
Last Name: Unruh  
Mailing Address: 200 Maine  
City: Lawrence  
Country: United States  
State or Province: KS  
Postal Code: 66049  
Organization Name: Lawrence-Douglas County Health Department

Comment Info: =====

General Comment:As a WIC nutritionist I support all of the changes to the WIC food package. My clients are often requesting fresh fruits and vegetables. Obesity rates are higher in low income populations which are served by WIC. The goal of teaching young children healthy food habits would be enhanced with the inclusion of fresh fruits and vegetables, whole grain breads and low fat milk after age 2. I would also support use of WIC checks at farmer's markets to provide income for local farmers. I believe that including juice in the food package for 6 mo old clients is harmful. Many parents do not realize the harmful effects of juice in a bottle. Offering baby foods instead would eliminate that issue. One of the advantages of WIC is that the food package can introduce families to foods they would not purchase on their own. The proposed changes to the WIC food package could have a long term impact on the health in this vulnerable group.

LA-1231

From: Kim Elkins [kim.elkins@SDARC.org]  
Sent: Monday, November 06, 2006 1:22 PM  
To: WICHQ-SFPD  
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

To Whom It May Concern,

I would like to voice my support for the regulatory changes to the WIC Food Packages, which will make healthy food choices easier, and improve health outcomes, for future generations of WIC families.

Thank you,

Kim Elkins EdM CLE

Breastfeeding Coordinator, Women, Infants & Children (WIC) Program

+American Red Cross

San Diego/Imperial Counties Chapter  
3950 Calle Fortunada  
San Diego, CA 92123  
Main Line (858) 309-1200  
Direct Line (858) 309-1413  
Fax (858) 309-1286

Did you know our chapter serves nearly 2,000 military families every month through the Armed Forces Emergency Services Program (AFES)? Our dedicated AFES caseworkers are on call around the clock to help deployed military personnel send and receive emergency communications to and from their families at home. Although chartered by Congress to provide this service, the Red Cross does not receive government funding for AFES. To learn more about or to support AFES, please visit [www.sdarc.org](http://www.sdarc.org).

LA=1232

From: Angie Treadwell [atreadwell@umchs.org]  
Sent: Thursday, October 26, 2006 11:06 AM  
To: WICHQ-SFPD  
Subject: "Docket ID Number 0584-AD77, WIC Food Packages Rule

To Whom it May Concern:

I am writing to support USDA's proposed new WIC food packages rule because I believe it will help improve the health of WIC participants by positively impacting the nutritional quality of their diets.

I am very excited about the addition of fruits, vegetables, whole grain bread, corn tortillas, and the option of soy milk and tofu, as well as the promotion of low-fat milk and whole grain cereals and reductions in juice. These food package adjustments will be a big help in supporting the dietary changes that I recommend to WIC clients.

I can only hope that these changes will reach the local level quickly.  
Thank you for your time.

Sincerely,

Angela Mathison Treadwell, RD, LD  
Nutrition Services Director  
Umatilla-Morrow Head Start/WIC  
110 NE 4th  
Hermiston, OR 97838

LA-1233

From: no-reply@erulemaking.net  
Sent: Wednesday, August 30, 2006 2:46 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: Irena  
Last Name: Garlic  
Mailing Address: 4440 SW Archer Rd. # 1026  
City: Gainesville  
Country: United States  
State or Province: FL  
Postal Code: 32608  
Organization Name: NCF WIC

Comment Info: =====

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

LA-1234

From: no-reply@erulemaking.net  
Sent: Friday, September 22, 2006 3:30 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: Michelle  
Last Name: Groves  
Mailing Address: PO Box 107  
City: Columbus  
Country: United States  
State or Province: KS  
Postal Code: 66725  
Organization Name: Cherokee County WIC

Comment Info: =====

General Comment: The addition of vegetables and fruits to the WIC food package is long over due. We teach young families about the importance of vegetables and fruits in a healthy diet and that the over consumption of fruit juice is a contributing factor to the childhood obesity problem and childhood dental caries. Then the Kansas WIC food package has nothing to offer children except fruit juice.....no vegetables, no fruit. What kind of message are we giving these families? WIC Mothers I have talked with have expressed alot of excitement about the upcoming food package changes. Please, hurry. We are waiting!!

LA-1236

From: no-reply@erulemaking.net  
Sent: Thursday, October 26, 2006 5:12 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: Hannah  
Last Name: Emerson  
Mailing Address:  
City:  
Country: United States  
State or Province:  
Postal Code:  
Organization Name: McLean County Health Dept. WIC Office

Comment Info: =====

General Comment:My name is Hannah Emerson and I have been a WIC clerk for 5 years. There definately need to be changes. If we are supposed to be a nutrional program than fruits and vegetables need to be added. We have a farmers market in downtown bloomington every weekend and it would be beneficial to our clients if we made them available on their food instruments. I cannot count how many times I have been asked why we don't have those two items on their coupons. Especially when we get out of state transfers and the clients are telling me that in california and other states they are made available to them and they were more than dissapointed that they cannot get them here.

One other thing that should be added is the availability for our clients to purchase lactosfree milk. Alot of our children are lactose intolerant and are not able to drink cows milk. I know that we have the lactose reduced milk pachages but sometimes that is not enough. When that is the case they need to get a RX from the child's Dr to have the child put back on infant formula which shoul'n't be happening in my opinion.

LA-1238

From: no-reply@erulemaking.net  
Sent: Sunday, November 05, 2006 9:42 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: Pamela  
Last Name: Crosser  
Mailing Address: 101 Robbins Ave, PO Box 519  
City: Graettinger  
Country: United States  
State or Province: IA  
Postal Code: 51342  
Organization Name: Upper Des Moines Opportunity, Inc.

Comment Info: =====

General Comment: I am anticipating the proposed changes. For many years clients have been asking me for some of the foods in the proposed rules. Adding foods for infants is a long awaited change. I do of course hope there is a means to allow the dietitian to change this if necessary (ie.- premature or developmentally delayed infant - who cannot tolerate baby foods at the same age as a full term infant).

Fruits & vegetables are a great addition too. And a wonderful chance to educate the clients on \$ mgmt. And a wonderful alternative to JUICE as the only fruit/vegetable. Many children drink too much juice & milk - making a better variety of foods offered thru WIC- will allow better nutrition for all the clients.

I hope that the focus of these proposed changes remains on the health of the clients. I await eagerly for these wonderful changes.

LA-1239

From: WebMaster@fns.usda.gov  
Sent: Monday, November 06, 2006 11:33 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: ELIZABETH BRAND  
EMAIL: LIZONBKA@YAHOO.COM  
CITY: NEW YORK  
STATE: NEW YORK  
ORGANIZATION: WIC  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: November 06, 2006  
Time: 11:33:15 PM

COMMENTS:

Food package IV:

I think amount of eggs has to be the same (as source of protein). For some families to buy meat/poultry on a regular daily basis could be expensive.

Tofu is not too popular for the population we serve, so amount of eggs could be a substitute for tofu for some families.

Providing whole grain should give some option for participant with celiac disease.

Food package VII:

Fish should be fully or partially substituted with chicken. Some women have allergies for fish/seafood; some don't eat as much fish.

Formula.

Giving almost no choice for partial BF with no formula at all for the first month will bring "numbers" down for BF women. I believe that a lot of participants would prefer to have formula and pretend not to be a BF at all, in purpose to have formula for the future, in order to save some money for the future. On the other hand as an experience BF mom I think there is no formula at all should be given at first month, because there is no need for it. Those participants who breastfeed on a regular basis will never give formula to the baby.

Also, I believe it would be a big confusion with the prorating of the formula, changing of formula, and rounding up the amount of formula.

Sincerely,  
Elizabeth Brand.

From: WebMaster@fns.usda.gov  
Sent: Monday, November 06, 2006 11:53 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Wendy Lewis, RD,LD  
EMAIL: bwlewis89@msn.com  
CITY: Cedar Rapids  
STATE: IA  
ORGANIZATION: WIC  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: November 06, 2006  
Time: 11:52:38 PM

COMMENTS:

I like the elimination of juice for the infants and the reduction for other participants. I also like the addition of canned beans. But, I am greatly concerned about the proposed reduction of formula at 6 months of age--I agree that a reduction could take place, but it should not occur until babies are 9 months old. As a WIC dietitian, we educate the moms that the 6-9 month age range is when baby foods are introduced, but they have little nutritional value, and their role is more as a way for babies to learn how to eat, learn tastes as a transition to eating. We tell the moms that the formula is still the most important/the primary nutrition, and that the baby should continue to drink 30-40 oz formula/24hours during this time. At 9 months of age, when the baby is able to eat some table foods, then, baby can expect to drink less formula 20-30 oz, as baby is able to get more nutrition from solid diet at this time. I also have a concern about decreasing the amount of formula partially breastfeeding moms can get--I understand the good idea behind this, but I wonder about the moms who go back to work and can not or choose not to pump, but yet they continue to breastfeed in am and in pm before and after work, say 2x/day breastfeeding--if they are unable to get enough formula, will they maybe just stop breastfeeding so they can get more formula-enough? Or do we consider them formula fed to meet their formula needs, though they may be unrecognized partial 1-2x/day breastfeeders?

LA-1241

From: WebMaster@fns.usda.gov  
Sent: Monday, November 06, 2006 11:26 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Remedios G. Reyes  
EMAIL: rereyes@syhc.org  
CITY: Chula Vista  
STATE: CA  
ORGANIZATION: SYHC WIC PROGRAM  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: November 06, 2006  
Time: 11:26:22 PM

COMMENTS:

THE WIC community has waited 32 years for these comprehensive science based nutritional revisions. We are very 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. as early as it is feasible.

We strongly support providing 8.2 million WIC mothers and young children with cash value vouchers to purchase fruits and vegetables. We urged USDA to work with Congress to secure increased federal funding in future years to bring cash value of these fruits and vegetable vouchers up to IOM-recommended levels and to keep pace with inflation. the proposed voucher levels are an excellent start and should be immediately implemented.

We strongly recommend to enhance the support of exclusive breastfeeding by being allowed the option to provide the breastfeeding infant, in the first month with no formula or 1 can formula as recommended by IOM Report.

LA-1243

Docket ID# 0584 -AD77 WIC FOOD PKG  
From: Dolstad, Wende  
[WendeD@skagitcap.org]  
Sent: Monday, November 06, 2006 7:44 PM  
To: WICHQ-SFPD  
Subject: Docket ID# 0584 -AD77 WIC FOOD PKG

I applaud that you are proposing changes in the WIC food package. Especially beneficial are the fruits and vegetables.

I would prefer that clients do not get ANY juice with exception of tomato juice  
I feel that the local WIC experts should be able to distribute formula to breastfeeding moms in the first two months post partum in a manner that is most encouraging to continued breastfeeding for THAT particular client. One rule in this area does not fit all situations.

I feel that soy milk should be made available to clients (both women and children) who NEED it and that it NOT require a doctor authorization. Clinic staff/RD's can determine need on an individual basis. It is unnecessary, and expensive for state Medicaid programs to require an authorization from doctor.

I feel that yogurt should be allowed as an option also.

I feel that whole milk should be an option for clients. It is reasonable to require RD approval after age 2.

I feel that there should NOT be a reduction in eggs because clients really need the protein.

I feel that canned beans/legumes should be an option, perhaps could be allowed a greater quantity when choosing dry legumes.

Thank you for asking for input. Congratulations on changing the WIC food package.

Wende Dolstad RD,CD  
Skagit Community Action WIC Coordinator  
330 Pacific Place  
PO Box 1507  
Mt. Vernon, WA 98273  
360-416-7595 (or -7585)  
Community Action Partnerships  
Helping People, Changing Lives

LA-1251

From: Debbie D Mote-Watson [WatsonDD@jacksoncounty.org]  
Sent: Monday, November 06, 2006 8:46 PM  
To: WICHQ-SFPD  
Subject: Docket ID number 0584-AD77 WIC food packages rule

I would like to take this opportunity to comment on the proposed food packages for the WIC Program. The majority of these recommendations are long overdue, and I can't wait until they can be implemented. I am the WIC Manager for Jackson County WIC, in Medford, Oregon and we get frequent comments from our clients about the large amount of juice provided by the WIC Program and wishing that they could have access to fresh fruits and vegetables year round vs. only during the Farmers market program during the summer. The Farmers market has always sent a wonderful nutrition message vs. juice! And the clients always love it, especially taking their children to the markets to purchase the fresh fruits and vegetables. And having dairy alternatives is so important for those who do not tolerate dairy well, or it is not culturally appropriate for the client and their family.

The main concern that I have is not having the option to supplement a small amount of formula for an infant during the first month of life.

Exclusive breastfeeding is the goal most definitely, and we have many mothers who do that now. But there are occasional situations where the baby needs to be supplemented to actually assist Mom with being able to continue breastfeeding. If she had to choose a full package of formula just to be able to supplement that could sabotage the great strides we have made here in Oregon with our excellent breastfeeding rates. We always promote breastfeeding, and our Mom's have access to breast pumps when needed. The strict either or for exclusive or artificial milk is not very realistic for some situations, but the goal that we strive for every baby born here in Jackson County.

Thank you so much for all of the hard work organizing this proposal for the WIC Program. We all look forward to implementing these exciting new options!

Debbie Mote-Watson  
Jackson County WIC Program Manager  
1005 E. Main Bldg A  
Medford, OR 97504  
(541) 774-8020  
(541) 774-7986 (fax)

LA-1254

From: no-reply@erulemaking.net  
Sent: Monday, November 06, 2006 8:37 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: Vicki  
Last Name: Nealis  
Mailing Address: 921 NE 23rd  
City: Oklahoma City  
Country: United States  
State or Province: OK  
Postal Code: 73105  
Organization Name: Oklahoma City-County Health Department

Comment Info: =====

General Comment:As a WIC Clinic Coordinator of an agency with 6 WIC clinics serving 9-10,000 WIC Clients per month I have reviewed the changes recommended to the WIC Food Packages. I greatly appreciate the many changes proposed. The information from the IOM is very comprehensive. I have had concerns for several years with our inability to issue soy milk and soy products to clients who have intolerance/adverse reaction to intact protein or to milk proteins especially. We are required to issue them soy infant formula to assist with this need.

The addition of fresh fruits and vegetables, which we include in our nutrition education class, would now be made available to our WIC clients. We could also use the addition of baby fruits and vegetables in teaching our mom's the appropriate time to add these foods to the infant's diet. WIC was started to address the deficiencies found in the diets of low/moderate income families. It is now time to change the packages to address adult obesity, childhood obesity and prevention of childhood obesity.

LA-1255

From: Felicia Francisco [ffrancis@co.riverside.ca.us]  
Sent: Monday, November 06, 2006 7:54 PM  
To: WICHQ-SFPD  
Subject: Docket ID number 0584-AD77, WIC Food Packages Rule

I wanted to state my support for the proposed changes to the current WIC food packages. The packages are outdated. In California, we have a diverse population and are lucky to have access to fresh fruits/vegetables year round. It is important to continue to stress the nutrition message and the proposed changes to packages is definitely a plus.  
Felicia Francisco, WIC Nutritionist, Riverside County, California.

LA-1256

From: WebMaster@fns.usda.gov  
Sent: Monday, November 06, 2006 7:35 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Dosoon Min  
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ORGANIZATION: Open Door Family Medical Centers  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: November 06, 2006  
Time: 07:35:02 PM

COMMENTS:

- 1) To provide cheese, tofu or soy milk for a substitution of milk is a really needed changes to meet cultural diversity/preference of participants' and it should not be required any medical indications to substitute these foods.
- 2) I feel that if we give participants' a choice of one or two cans of formulas for back- up for exclusive breastfeeding mothers within one month period of baby's birth, we will have more success rate of breastfeeding. I am afraid that if participants has to decide either exclusively breastfeeding or formula feeding, knowing that no formulas provided within one month period, we will might force women to turn more to formula feeding because they might be afraid of not having enough money to buy formulas in case she desperately needed. Our program has been keeping above 90% of breastfeeding participants for years, and I know how participants will react if they have no choice of back-up plan. Each case should be left with the CPA's case by case assessment/judgment.
- 3)What a great idea to add fruits and vegetables in infants food packages after 6 months of age and meats in exclusive breastfeeding infants food package!
- 4) Adding fruits and vegetables in the food package is the greatest thing ever happening in the WIC history and much needed change. I feel though it would be ideal to provide exclusive breastfeeding mothers \$12 worth of fruits and vegetables.
- 5) Beside of variety of canned fish, add a choice of canned chicken also, for a substitution of canned tuna for exclusive breastfeeding mothers would be great because of concern over high mercury content of tuna fish.

assessment

I feel that if we do not allow any back up support to our exclusive breastfeeding mother and ask them to decide either exclusive breastfeeding or non breastfeeding within one month of baby's birth it will turn alot of mother to decide to non-breastfeeding, because they are affraid that if breastfeeding is not going well within this period, they do not have money to buy formulas. My program contains above 90% breastfeeding mother and I think if we could provide them 1 or 2 cans of formulas for back up, it will have more successful breastfeeding ratio.

LA-1257

From: WebMaster@fns.usda.gov  
Sent: Monday, November 06, 2006 11:28 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

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NAME: Jeannette Salazar  
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ORGANIZATION: SYHC WIC Progra  
CATEGORY: WICLocalAgency  
OtherCategory:  
Date: November 06, 2006  
Time: 11:28:18 PM

COMMENTS:

On my behalf and the SYHC WIC Program, we strongly support the new proposed WIC Food Packages published in the Federal Register on August 7, 2006. It does support the AAP recommendations. It promotes breastfeeding. It is consistent with the dietary guidelines for americans.

We look forward to assist USDA in the implementation of the new food package which will have a very positive nutrition impact on women,infants and children.