

OCT 20 2006

LA-139

Dear US Department of Agriculture:

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

I think is a good option to make some changes in the food package.

The changes that I like the most is/are

- Low-fat milk only if > 2 yrs age

Promotes healthy diet at early age.

- We'd like no juice and give more f/v.

There is not reason for juice.

- There should be no juice for infants give fruits instead.

- No presevation required for soy milk + tofu for toddlers.

- Soy milk - can choose instead of milk.

- \$8.00/\$6.00 not enough for F/V.

The reason that I like these changes

is because our kids need more vegetables we could make a whole meal of these foods!

Thank you for your efforts to make WIC families healthier...

Sincerely,

OCT 20 2006

LA-140

Sacramento, CA 95817

October 5, 2006

To: US Department of Agriculture:

I am writing to tell you, what I think about the wonderful proposal to change WIC foods regarding the fruits and vegetable. That give the client great opportunity to eat healthier, provide good resource for the family. Many families have been and hoping to see the changes. Since I have started working for WIC, many mother ask "how come we do not receive fruit and vegetable?" Now it the opportunities. With the food package the client are receiving are good but with this new food package it will even better for family to reduce the obesity.

Sincerely,

OCT 20 2006

LA-
141

OCT 5, 2006

Dear USDA,

This letter is to express my feelings on the proposal to change WIC foods. The changes I like the most are the new cultural foods like tortillas, and the amount of juice that would be taken out.

One thing I'd like to see different would be a variety of dairy for example cutting back on milk and having yogurt as an option.

Well regardless the new proposal would be a start and that's good enough for me.

Thanks for your time and efforts to make WIC families become healthier.

Sincerely,
Sacramento CA WIC
Nutrition Assistant
mother of two

OCT 20 2006

LA 142

Oct. 5, 2006

Dear U. S. D. A.

The undergoing changes to the food packages is going to change not only what is consumed, but will also reflect a healthier dietary awareness. The new changes will hopefully promote a healthier and better understanding to our people. Any small change is good and will trigger a healthier America tomorrow.

Sincerely,

OCT 20 2008

LA-143

10/5/06

Dear US Department of Agriculture:

I am writing to tell you what I think about the proposal to change the WIC foods. I really think its a great idea specially because we have a great population of obese children as well as infants and if there is a way we can start introducing fruits and vegetables to them at an early start it would be great for them to try and fight the obesity for them.

I like the fact that there will be more whole grains and adding fruits and vegetables.

I think that our participants should receive a little more money for fruits and vegetables other than that its a great change.

I hope this change really happens it will benefit all children and families thank you for your effort in trying to make the change

Sincerely,

OCT 20 2006

LA 144

October 5, 2006

Dear US Department of Agriculture:

I am a registered Dietitian working for the WIC Program in Sacramento County. I am writing to tell you what I think about the proposal to change the WIC food packages. Coming from a different culture, I am really pleased and grateful that the proposal includes foods that are appropriate for different populations. I am sure that the clients feel the same way. I also like the fact that it will include fruits and vegetables, less amount of juice and the option for soy milk. These changes promote healthy eating and more in line with the dietary guidelines. It will also give us the chance to "practice what we preach."

Thank you for your collaborative efforts in ensuring that we continue to provide healthy foods for WIC families.

Sincerely,

RD

Sacramento County WIC

OCT 20 2006

LA 145

DEAR US Department of Agriculture:

I am writing to tell you that I think the WIC proposal for a change in the WIC package is a great need. As a WIC employee and participant these changes will benefit our families.

The changes I really like best are Move Fruits & Vegetable in our diet. So providing fruits and vegetable in the WIC package give participant a chance to buy more produce.

The only thing I would change is not to have a prescription for Soy or TOFO. Some people just prefer Soy milk.

Sincerely
[Signature]

OCT 20 2006

LA 146

October 5, 2006

Dear US Department of Agriculture:

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

The changes that I like the most are fresh fruits and vegetables, whole grains and salmon, sardines for breastfeeding moms.

The reasons that I like these changes are: people will eat healthier, and they could make a whole meal of these foods.

Thank you for your efforts to make WIC families healthier.

Sincerely,

OCT 2 0 2006

LA-147

10/5/06

Dear US Department of Agriculture:
I am writing to tell you about
The proposal to change the WIC Foods.

I think these changes are great!
I see more variety of foods as well
are healthier food

Thank you for the efforts to make
WIC Families healthier. ~

Sincerely

OCT 20 2006

LA-4
148

10/5/06,
SACRAMENTO, CA.

Dear USDA,

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

"GREAT JOB, WE ARE THEM FINALLY TO HELP OUR WIC FAMILIES BY PROVIDING WIC FOODS WHICH WILL LEAD THEM TO 'HEALTHY LIFE STYLE'."

THANK YOU for the proposal and I am waiting forward to see this change.

Sincerely

MS, RD

(WIC Dietitian)

10/5/06

OCT 20 2006

LA-149

October 5, 2004

Dear U.S. Department of Agriculture

I am writing to tell you what I think about the proposal to change WIC foods. The changes that I like the most are the Fruits and Vegetables, breads and tortillas. The reasons that I like these changes are because it is better and healthier for mothers and the children that are on the program. Thank you for your effort to the WIC families healthier in all ways.

Sincerely

OCT 20 2006

LA 150

10/05/06

Dear US Department of Agriculture:

I am writing to tell you what I think about the proposal to change WIC foods. The changes that I like the most are the addition of fresh fruits and vegetables and the decrease in juice. I am a dietitian working at WIC and it would be wonderful to provide foods consistent with what we teach participants about good nutrition. This change would also do a lot to help the growing obesity in children. Lastly, this is a change that participants have been asking for and would greatly appreciate. Thank you for your efforts to make WIC families healthier.

Sincerely,

RD, MS

OCT 20 2006

LA-151

Dear US Department of Agriculture:

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

That changes that I like the most is that you are adding vegetables, that reason that I like these change is that that there will be a better nutrition for the children.

One thing that I will like to see different about the food changes is option between choosing juice or more vegetables.

Thank you for your efforts to make WIC families healthier.

Sincerely

LA-152

OCT 20 2006

18CLC

October 5th 2006

Dear United States Department of Agriculture,

I am writing to express how very pleased I am to see the proposed changes in the types of foods given by WIC.

I have worked at the Sacramento County WIC program for thirteen years now. I have been very aware that the foods given and the type of nutritional education as to what comprises a healthy diet have not matched well. It is confusing to our participants to have us teach and counsel about healthy choices but then not offer ways to buy those foods. The proposed changes are excellent. The recognition of the food choices of other cultures is very appropriate. Changes such as whole grains, tofu products and fruits and vegetables are really good.

I would also like to see the inclusion of yogurt and cottage cheese as alternatives too, less juice and more fresh produce would also be very acceptable to the WIC participants.

I would like to thank you for all the

OCT 20 2006

LA 153

10/5/06

Dear US Dept. of Agriculture

Congratulations on considering making changes in the WIC food program.

Many families in our country are recipients of food vouchers from WIC, they (the families) look to WIC as knowledgeable nutritional counselors.

WIC needs to walk the talk - with the changes you are considering this will make a big difference.

The changes I like most are fruits & vegetables - with the current recommendation of 7-9 fruits & vegetables, this should greatly help the WIC clients meet these goals.

The changes I would like to see would be the elimination of juices & increase the ~~quantity~~^{amount} amount of fruits, vegetables & proteins. This will help with the variety of cultures move to healthier life styles.

Thank you in advance for making these changes.
Sincerely,

OCT 20 2006

LA-154

Dear: USDA

I'm writing to tell you what I think about the proposal to change WIC food

The changes are very good, it gives the participants more choices that are healthier for breastfeeding moms & toddlers

I was a participant my self & I see that these changes are great & healthier for every one also it fits into other culture package of food as ben mor divers,

Some of the things I would like to see different about the food changes are the ability to have more choices in what to eat and also ben able to buy fruits and vegetables all do the amount is less it will be good to increase it.

Thank you for your efforts to make WIC families healthier

Sincerely,

OCT 20 2006

LA-155

Dear USDA,

I am writing to tell you what I think about the proposal to change WIC foods. I am very excited to see the new healthy foods. The changes I like the most are the addition of fresh fruits & vegetables, soy milk and tofu. I have worked @ WIC for 10 years & have been a WIC participant myself. I can tell you the participants have been asking for these foods.

Many people & children cannot tolerate cows milk & have to buy soy milk on their own, and the cow milk vouchers go unused. Also the families on WIC trust us and they believe the foods we give them are "the best foods".

We have a responsibility to provide healthy foods. One thing I would like to see differ about the food changes are more money for fresh fruits and vegies and less Juice. Thank you for your efforts to make WIC families healthier.

Sincerely,

OCT 20 2006

LA
156

Oct. 5, 2006

I am writing to tell you what I think about the proposal to change wic foods. That's so wonderful for the clients. The changes that I like the most are give the clients more options to receive a healthier diet.

But still one more I would like to see is the option of receiving cheese or veg. or milk or slices cheese. Because I work for wic I always hear participants as if they can choose something else beside cheese. And thank you for your efforts to make wic families healthier.

Sincerely,

SNA

SNA

OCT 20 2006

LA 157

10/5/06

USDA office,

I'm writing to comment on the proposed changes to WIC food packages.

I'm pleased to see the addition of fresh fruits and vegetables, decrease in juice, options for soy milk and tofu, and limitation on whole milk. This is a step toward a healthier America.

What I would like to see is to eliminate juice for infants.

Sincerely,

MS, RD

Sacramento County WIC

OCT 20 2006

LA 154

10/5/06

Dear US Department of Agriculture.

I am writing to tell you what I think about the proposal to change WIC Foods. I think this is going to be so much better.

The changes that I like the most is that we are going to get Fruits & Vegetables.

The only thing that I will like to see different about the food changes is to get more dollars for the Fruits and Vegetables.

Maybe reduce another gallon of milk or cereal that will give us a little more for Fruits and Vegetables.

10-5-06

OCT 20 2006

LA 159

10/4/06

Dear US Department of Agriculture:

I am very thrilled/excited/happy/content with the proposed changes in the WIC packages. As a WIC participant, myself I love the option of fruit & vegetables. I am happy that with the packages you get more options, ~~that are~~ It makes sense if you are providing vouchers for these kinds of food is because they are good for my family.

One thing I would like to see is that for the cheese option gives us an option between tofu or cheese, please.

With the proposed packages I see that a family can make a meal with what's being offered. And you are enforcing what's being taught at WIC.

Please make the changes to our packages, you can not go wrong.

Thank you,

10/15/06

USDA

OCT 20 2006

LA-160

To Whom It May Concern,

I have been a dietitian working in the WIC Program for almost 20 years and have seen how the foods distributed through WIC has affected the eating habits of the participants. The foods that WIC have not kept up with the changing recommendations of the Dietary Guidelines for Americans. The new proposal that includes less saturated fat (less milk and cheese + eggs) and more fruits + vegetables and fiber, is a wonderful proposal - it is going in the right direction for the American low-income families.

I have often heard ^(from participants) that juice ~~must~~ be good, since so much of it is provided by WIC. We are a supplemental food program, and we really don't need any juice at all - the money you save on that could provide even more fruits and vegetables. The fact that WIC will not be "pushing" any juices will send a message that the food is not really necessary. It is causing a lot of overweight children - a problem we have seen grow in America. I love that we are adding soy milk and tofu, brown rice, corn tortillas - it is accommodating people who are from other cultures who were not able to make use of the current WIC vouchers because milk + cheese were not used in their families (Asian families - It would be wonderful if we could

OCT 20 2006

LA
161

Dear US Department of Agriculture, 10/05/01

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

The changes that I love the most are the money for fruits and vegetables and less milk and juice, but bread and tortilla is now included. Fruits and vegetables will be able to provide our participants fresh nutrients and vitamins. Not only that, we're actually providing the participants what we teach at WIC. Bread and tortilla is great because our participant can actually put peanut butter and the cheese in use.

The changes I don't like is that the money provided for fruits + vegetables is not enough. I would like to see more money provided if possible.

Thank You for your efforts to make WIC families healthier and my family healthier!

Sincerely,

OCT 20 2006

LA 162

10-05-06

Dear USDA,

I'm very pleased to see that you are aware of the great need there is to change our current WIC food packages. WIC foods no longer fulfill the nutrition needs of our participants.

I'm especially happy to see that we'll be eliminating some of the juice and adding fruits and vegetables. It would be even better if we eliminated ALL the juice and instead added more fruits and vegetables.

Another great change in the proposal is the choice of whole grain foods that will be included. Also the elimination of whole milks from some of the food packages is a very good choice.

These changes are consistent with today's nutrition needs and will help us very much as we continue offering nutrition education to our WIC families.

Thank for caring enough to make a difference.

Sincerely,

Nutrition Assistant II, Sacramento County WIC

LA 143

OCT 20 2006

Oct. 5. 06

Dear US Department of Agriculture:

I am writing to tell you what I think about the proposal to change WIC foods. I feel that the changes are good and will help to teach participants how to eat healthier. I work for WIC as a nutrition asst. and I feel that we will finally be able to practice what we teach in our nutrition classes. We would really like to see these changes pass.

Thank You

Dorinda Mendez (w)

OCT 20 2006

LA 164

To US Department of Agriculture. Oct 5, 2006

I As a WIC participant and employee will like to write to you about what i think of your proposal to change the WIC foods.

The changes that i like the most, and think they will be a great effect are including vegetables, tortillas and more having a little more of choices towards the packages. I also like the fact of reducing the juice. I as a participant thought that I was getting a lot of juice, and no one at home really likes to drink so much juice.

Things I would like to see different are the baby-cereal, sometimes participants use all the baby-cereal, and maybe have more choices on the packages as like if they sent went juice at all they can replace it with vegetables. But in overall I think so far, the proposal is awesome.

OCT 20 2006

LA-165

Dear US Department of Agriculture:

I'm writing to tell you what I think about the proposal to change wic foods. The changes that I like the most are the reduction of milk and juice. This is because many children are filling up on milk and juice and have no room for healthier foods. Such as vegetables, parents may think the child is just a "picky eater", and the child may not be thriving as they should. With this change we should see children eating more and drinking less.

Thank you for your efforts to
make wic families healthier,

OCT 20 2006

(LA 5/16/06)

10/5/06

Dear US Department of Agriculture

I am writing to tell you what I think about the proposal to change WIC Foods. Currently I am part of the staff at Sacramento County WIC Office in California as Senior Nutrition Assistant. On a daily basis we impact clients lives with the nutrition information we give them, and most importantly with the food vouchers we offer them. Once they leave our WIC Clinic, by allowing them to feed their children and themselves nutritious foods we already provide.

However the changes that I like most are the fresh fruits and vegetables we can offer, the cut back of juices, more grains added on such as the whole wheat bread and tortilla, especially cutting back or making 2% or reduced fat milk standard for children and moms.

There are a few things that I would like to see different about the food changes which consist of the following, not requiring a doctor's note for children to obtain soy milk or tofu, maybe limiting more of the

OCT 20 2006

LA 167

10/5/06

Dear US Department of Agriculture:

I am writing to tell you what I think about the proposal to change WIC foods. The change is so great! This is will be a good improvement in our WIC participants daily meals.

The changes that I like the most are fresh fruits and veggies, more variety from whole grains food group, ^{lower} fat milk choices, and increased variety of choices for ^{WIC} cultural diversity.

The reasons that I like these changes are we'll be practicing what we teach, reflects current diet guideline more fiber foods, ^{will help to} decrease child's obesity.

Thank you for your efforts to make WIC families healthier.

Sincerely,

OCT 20 2006

Oct. 5 2006

LA-164

Dear US Department of Agriculture:

I am writing to tell you what I think about the proposal to change WIC foods. First of all I would like to thank you for this wonderful proposal. I am a WIC participant and believe that the new ~~changes~~ food proposal will help my family live healthier lives.

The changes that I like the most are that they promote healthier diets at an early age. There is less juice, low-fat milk, only for children 2 years of age. I also think it's wonderful that the new proposed foods fit all cultures. The new variety promotes healthier meals and it is possible ~~with~~ to create an entire meal with the new packages.

One thing that I would like to see different about the food changes is to remove all juice from the foods proposed. The American Academy of Pediatrics states that juice is not necessary for us to get our vitamin C.

OCT 20 2006

10-05-06

LA-16

Dear US department of Agriculture

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

The changes that I like the most is are fruits and vegetables, whole grain choices. Dairy substitutions soy beverage, tofu. The reasons that I like this changes is are more healthier families.

Thank you for your effort to make WIC families healthier.

Sincerely

OCT 20 2006

LA 170

Dear U.S. Department of Agriculture

I am writing to tell you what I think about the proposal to change WIC foods. The changes that I like the most is the fact that you are including fresh fruits and vegetables. This is really exciting for me as a nutrition assistant and a student to become a dietitian. The reason it is very exciting to me is because ~~now~~ when we teach the importance of eating fruits and vegetables this change in proposal to add fruits and vegetable will reinforce what we teach. I also love the fact that the amount of juice we give out is decreasing because in reality juice is one factor that is increasing the obesity problem we have among our children in the U.S.

There is one thing I would love to see different because we do help different cultures and that is to give ^{more} options in the dairy group. For example there are some cultures that do not eat cheese ^{dairy group} and giving them the option to choose ~~from it~~ from this food group will increase there

OCT 20 2006

LA-
171

10-5-c

Dear US department of Agriculture:

I am writing to tell you what I think about the proposal to change wic foods. The changes that I like the most are the decrease in milk, juice and eggs. The reason's that I like these changes is that we see a lot of children with obesity problems and being able to offer other foods and decrease the foods that can contribute to their problem will greatly benefit all children. One thing that I would like to see different about the food changes is an even more decrease in milk and juice and an increase in more fruits and vegetables this is because teaching children at an early age ~~will~~ ~~be~~ healthy habits ~~that~~ will last them a life time.

Thank you for your efforts to make wic families healthier.

Sincerely

10/5/06

Dear USDA

OCT 20 2006

LAF 12

As a long-time Dietitian for the WIC Program, I am writing to heartily support the proposed changes to the WIC food packages. My reasons are the following:

- ① WIC will ~~reflect~~ ^{now} be consistent with the US Dietary Guidelines especially reduced fat, incl fiber in the form of whole grains, fruits, & veg.
- ② WIC will ~~be~~ ^{be} more adaptable & suitable, offering more variety of choices to accommodate ~~the~~ ^{available} cultural diversity as well as ^{options} for milk allergy/intolerances in young children.
- ③ ^{diet & health related} The teachings of WIC will be reflected in the food packages it offers.

These changes are most welcome and long overdue, especially in light of our country's obesity crisis.

Thank you for your support
Sincerely,

no

OCT 20 2006

LA 173

10/05/06

Dear US Department of agriculture

I'm writing to tell you what I think
about the proposal to change WIC foods

~~I~~ The changes that I love are

1. get money to buy fresh fruits
and vegetables

2. whole wheat bread

3. whole wheat tortillas

Actually I like all the changes I
think that is the best change,
ppl will love this change are good for
Healthier in all ways.

Sincerely

OCT 26 2006

10/6/06

LA-
174

Dear US Department of Agriculture:

I am writing to tell you what I think about the proposal to change WIC foods. The changes that I like the most are the reduction of milk and juice, the option of soy milk/tofu and the allowance of fruits and vegetables. The reasons are due to the fact that I currently work for WIC as a dietitian. In what I do every day there is a strong need for changes in the current vouchers. Too many people think that juice is a nutritious supplement for fruits/vegetables when it is clearly not and the cause for so many cases of obesity, tooth decay and improper nutrition. The offering of soy milk/tofu would also keep with the cultures that we see on a daily basis.

Any changes would be beneficial to our program. Please look into these proposed and consider these changes. It would be so beneficial to our population and dietary needs for those in our program.

Sincerely,

RD

October 5, 2006

OCT 20 2006

LA-
175

Dear US Department of Agriculture:

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

The changes that I like the most are that the fact you added Fruits, veg, tortillas, and whole grain bread. Those changes will help us WIC Counselors practice what we teach our participants.

Two things that I would like to see different would be the amount of money for vegetables, instead of \$8.00 or \$6.00, maybe \$20.00 and also a combination of cheese and yogurt.

Thank you for your efforts to make WIC families healthier. . .

Sincerely;

OCT 20 2006

October 5, 2006

Dear U.S. Dept. of Agriculture:

I am writing to tell what I think about the proposal to change WIC. The changes are wonderful and life changing opportunities for WIC clients.

The changes that I like most are vegetables, whole grains and other culture appropriate food choices. Reducing milk & juices are great changes, very much needed change. The reasons that I like these changes are the opportunity for clients to make and affect lifestyle/behavior changes through food purchasing power and choices.

These changes are very much in line with the new dietary guide. One thing that I like to see removed about the food changes are: no juice and less baby cereals in the infant food instrument, instead please offer fresh fruits/vegetables.

Thank you for your attention to the
Sincerely,
R.D

Jeb Bush
Governor



I. Rony Francois, MD, MSPH, PhD
Secretary

October 26, 2006

OCT 26 2006

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

LA-180

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

Dear Ms. Daniels:

As Director of the St Lucie County WIC Program for 20 years, I strongly support the USDA issued proposed rule governing the WIC food Package published in the Federal Register on August 7, 2006.

The revisions are based on sound science allowing a wider variety of healthy food choices, and offering food packages that accommodate cultural food preferences as well. 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." As the Institute advised, I also agree that the WIC Program needs to respond to changes in nutrition science and the emerging health concerns of our nation. The rule balances the new foods with recommendations for less juice, eggs and milk to maintain cost neutrality. The addition of fruits and vegetables is essential to offer a food package supporting the health benefits these foods are widely known to provide.

The addition of infant fruits and vegetables at 6 months of age in varying amounts, as well as infant food meats for fully breastfeeding infants is a positive change. The addition of fruits and vegetables through "cash value" vouchers in the proposed amounts of \$8 for women and \$6 for children is a great benefit to families. Please consider including the \$10 level for fully breastfeeding women to match the IOM recommendation as an incentive. The dollar denomination of the "cash value" vouchers and the stocking requirements for vendors should be determined at the discretion of State agencies.

The proposed rule generally supports breastfeeding. However, please do not pilot test the food package for the partially breastfeeding woman. The woman's food package changes ought to be implemented concurrently so as not to have a negative effect. It is imperative to allow the breastfeeding infant, in the first month to have 1) no formula, or 2) one can of powdered formula as recommended in the IOM report. Locally, when a Baby Friendly hospital excluded infant formula samples entirely, they experienced a back lash from mothers who felt

ST. LUCIE COUNTY WIC PROGRAM

Fort Pierce Site
714 Avenue "C"
(772) 462-3900
FAX: (772) 462-3869
SunCom 259-3869

WIC Program Director
(772) 873-4890 SC 259-4890
Website: <http://www.stluciecountyhealth.com>

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5150 NW Milner Dr
(772) 785-6124
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SunCom 245-4917

they were being denied an option to choose. We encourage no formula at least for the first month, but a one powdered can option may help to decrease the potential of women choosing formula packages for their infants over fully breastfeeding. Unless the incentives for fully breastfeeding are strong enough to preclude any desire for formula, we may need this option.

The calcium-set tofu and calcium-rich and vitamin D-rich soy beverages as alternatives for milk are long overdue as a benefit to families who request this soy preference to meet their nutritional needs. Women and children should be able to receive soy products without the requirement of medical documentation. Our WIC Program has difficulties simply enforcing the medical documentation for non-contract formulas. Adding physician approval to make a normal nutrition food choice will use precious time that could be better spent on nutrition education with families. We may lose credibility in the medical community seeking out permission to make a normal nutrition selection. The additional cost for participants to visit their physicians is not acceptable when you consider we serve a low income population. Many families prefer soy beverages for vegetarian or health promotion reasons which are not "medical conditions". Hopefully, this will be excluded from the final WIC Food Package rule.

The inclusion of whole grain bread and other grains for all children and pregnant and breastfeeding women is supportive of current scientific recommendations. The IOM recommendation to make substitutions for "wheat-free" cereals based on medical prescription seems reasonable since it's usually based on a physical intolerance.

The recommendation to "round up formula" to the maximum reconstituted amount over time creates an administrative burden for local WIC agencies. The cans change in size periodically as manufacturers determine and to track the can size over a period of a year for rounding up calculations is an additional burden to already overworked and understaffed local WIC agencies. We hope this will not be included in the final rule. There should be at least a two-year time frame from the publication of the final rule to allow WIC State agencies adequate preparation, training, and technological adaptation to implement the final WIC food package.

WIC is the top public health nutrition program in the United States making a difference in the lives of women, infants and children. The long-term benefits of providing participants fruits and vegetables, lower fat dairy products and whole grains, as well as incentives for breastfeeding women is aligned with current scientific recommendations and will improve health outcomes.

Sincerely,



Mally Chrulski, RD, LD
Nutrition Program Director

Cc: Larry J. Lee, RN, BA, MA, Administrator/County Health Officer

ST. LUCIE COUNTY WIC PROGRAM

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October 26, 2006

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

LA-185
OCT 26 2006

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

Dear Ms. Daniels,

Thank you for allowing me to offer comments on the USDA's proposed regulations that will substantially revise the WIC Food Packages, published in the Federal Register on August 7, 2006.

I am a Registered Dietitian writing you on behalf of the Pomona, California, Fairplex WIC Center. Our caseload is 4,579 participants and we are so excited to support these long-awaited changes that will offer healthier and varied food choices for our families. Having worked for WIC these last 17 years, I have observed the need to change our food packages for many years. With obesity on the rise, these new changes really make sense and follow current nutrition science.

One of my major concerns is that yogurt has been left off the proposed packages. We work with many cultures that do not drink milk but include yogurt as a regular part of their diet. This may be slightly more expensive but well worth it when looking at the nutritional value. Please re-consider putting yogurt on the food packages. Not everyone will want it, and for those who do, the benefits are totally worth while. Lowfat and nonfat plain yogurt would be perfect. Further, calcium fortified soy beverages need to be included. However, asking for a doctor's note to receive soy products is a huge barrier and may prevent our clients from getting the nutritious foods they need.

Thank you for working with us on these proposed changes. It will make such a difference to the health and well being of so many women, infants, and children in our care not only in California but throughout the nation.

Sincerely,
Kathryn Cordova RD, CLE


Supervising Nutritionist
Fairplex WIC Center
668 Fairplex Drive
Pomona, CA 91768
(909)629-2993

To all interested parties:

- Especially, Patricia Daniels

From: Anita Speese
 WIC Nutritionist
 District Health Dept. #10
 PO Box 850
 White Cloud, MI 49349
aspeese@dhd10.org

LA-228

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

Hello, Ms. Daniels:

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 states being given the option to provide the breastfeeding infant in the first month with 1) no formula, or 2) 1 can of powdered formula as recommended in the IOM Report.

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 powdered formula is **more** than most newborns need to supply their total needs. 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 older.

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. DHS does not include the income of everyone in the household. If a baby's father is not married to the mother, for instance, his income is not included. We're having more and more instances of couples living together without being married. If we require proof of income for families that don't have

Medicaid, the married couple is actually being discriminated against. Their household income may be the same as the unmarried couple, but because they do not have Medicaid, the total household income determines eligibility.

I have written letters to President Bush and to our governor about this issue and got nowhere. I strongly believe programs like Medicaid, Food Stamps, and WIC should use the same rules to determine income. The WIC rules have a lot of detail, but they seem to be fair.

Thank you for taking the time to consider these comments.

Anita Speese

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



MetroHealth

October 13, 2006

OCT 25 2006

CASE
SCHOOL OF MEDICINE

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

LA-229

WIC Food Packages Rule

Dear Ms. Daniels:

I am writing on behalf of the Cuyahoga County Women Infants and Children Program's support for the proposed rule to change the Special Supplemental Nutrition Program for Women, Infants and Children food packages. The health and well-being of our participants is a priority of ours. The proposed changes will greatly benefit the 35,000 participants we serve monthly. It is time for a change and we are excited that USDA has responded to that need. We are pleased that the recommendations of the Institute of Medicine published in their April 2005 report are reflected in the proposed rule.

This is a huge step forward for the WIC program and will improve the overall health of our WIC participants. We strongly support adding fruits and vegetables to the food packages of women, infants and children. We realize that increased consumption of fruits and vegetables is associated with reduced risk for obesity and chronic diseases. Having started and participated in the Farmers Market Nutrition Program for 14 years in our county we have seen the benefits and desire from our participants to be able to add fruits and vegetables to their diet. We support the quantities of dairy products and eggs offered in the proposed rule and we support the whole grain requirement for cereals and the introduction of whole grain bread and other whole grains such as corn tortillas and brown rice. We fully support breastfeeding and appreciate the attention given to this important issue however we do not support the recommendation for the partially breastfeeding food packages for women and infants. We support states being given the option to establish criteria under which infant formula may be provided in the first month.

The Cuyahoga County WIC program strongly encourages publication of a final rule by spring of 2007 so that our participants can continue to enhance their diets with fruits and vegetables every month not just during the summer.

Again we thank you for taking this step and allowing us the opportunity to comment. We assure you we will support the rule and implement it as rapidly as we possible; our participants are depending on us.

Sincerely,

Barbara Riley
General Manager Public Health
The MetroHealth System

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OCT 25 2006

October 25, 2006

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

LA-231

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

Dear Ms. Daniels:

HRC Mother Lode WIC strongly and enthusiastically supports the USDA issued proposed rule governing the WIC Food Packages published in the Federal Register on August 7, 2006.

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

The proposed rule reflects recommendations made by the Institute of Medicine (IOM) of the National Academies in its report, "WIC Food Packages: Time for a Change." It follows the advice of the Institute, which stated that **the WIC Program needs to respond to changes in nutrition science, demographics, technology, and the emerging health concerns in the WIC community.** The changes in the proposed rule are consistent with nutrition education promoting healthier lifestyles and food selections to reduce the risk for chronic diseases and to improve the overall health of WIC's diverse population. **The Department's aim is to add new foods while preserving cost neutrality.** To cover the cost of the new foods, WIC will pay for less juice, eggs and milk that have been staples of this extremely successful public health nutrition program, which helps feed more than half the infants born in the United States.

Website www.hrcnet.org

Calaveras County: Main Office, 1113 Hwy 49, Bldg 2, Unit 3, P.O. Box 919, San Andreas, CA 95249
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HRC Child and Parent Services, 584 West St. Charles Street, P.O. Box 919, San Andreas, CA 95249
HR Community Services Program, 584 West St. Charles Street, P.O. Box 919, San Andreas, CA 95249
HRC Head Start/State Preschool, 42 Hwy 26, P.O. Box 1225, Valley Springs, CA 95252
Amador County: HRC Child Care Resources, 201 Clinton Road, Suite 204, Jackson, CA 95642
HRC Women/Infant/Children, 12356 Martell Road, Jackson, CA 95642

While there is some disappointment over the Department's decision to pay for fewer fruits and vegetables than recommended by the IOM, **we believe that WIC clients will be pleased that there will be more choices in the foods offered.**

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

We would also suggest **that States be given the option to provide the breastfeeding infant**, in the first month, with 1). no formula, or 2). no formula unless medically indicated, or 3). one can of powdered formula as recommended in the IOM Report. States would incorporate their option into their existing breastfeeding policies and procedures.

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. **Children and women participants will also benefit from the addition of fruits and vegetables through "cash-value" vouchers (CVV) to purchase fresh and processed fruits and vegetables in the proposed amounts of \$8 for women and \$6 for children. It is our experience from having the Mother Infant and Child Harvest (MICH) project, providing CVV for the last 4 years, is simple, easy to use for the participant and store and provides *only* fresh fruits and vegetables, not canned or frozen. While canned or frozen fruits and vegetables may be needed as an alternate for some states, WIC providing fresh from the produce department in authorized WIC stores, is easier for checkout, as noted from the Calaveras WIC grocers who take MICH CVV.**

As a model of providing fresh fruits and vegetables to WIC participants, it is clear by providing nutrition education and the opportunity in the choice of purchase of fresh fruits and vegetables empowers the participant to make good choices and is a positive change for the community.

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

We 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.

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. As an example with the MICH project, small rural grocery stores now provide a much wider variety of fresh fruits and vegetables in their small stores, which in turn in a win-win situation for the community at large. Printing of multiple voucher instruments in small denominations is costly and counter productive.**

The proposed food packages offer calcium-set tofu as well as calcium- and vitamin D-rich soy beverages as partial substitutions and alternatives for milk. These alternatives will prove to be particularly beneficial to those WIC participants who suffer the medical consequences of milk protein allergy, lactose maldigestion, and those with cultural preferences. Currently, there are no calcium-fortified soy-based beverages on the market that meet the proposed protein and potassium standards. Accordingly, **we 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. We 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, we support the IOM recommendation to **allow States to make substitutions for "wheat-free" cereals based on a medical prescription and urge the Department to include such a provision in the final rule.**

HRC Mother Lode 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 agencies regarding the promulgation of a final rule revising the WIC food packages and without exception. State agencies are looking forward to fully implementing the proposed rule. We 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.**

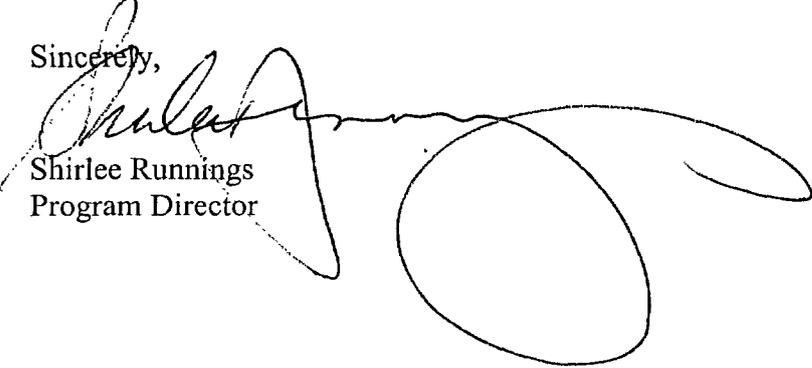
Again, HRC Mother Lode WIC enthusiastically and strongly supports the proposed rule. We are convinced that it will serve to minimize vendor stock requirements, reduce the administrative burden on States and local agencies, encourage the growth of Farmers' Markets, support participant choice, and most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

The proposed food packages will **provide greater amounts of all of the priority nutrients currently identified as needed by the WIC population. They will supply a reliable and culturally acceptable source of supplemental nutritious foods as well as promote and support exclusive breastfeeding. Equally important, the proposals will provide WIC professionals with the necessary tools to reinforce the nutrition education messages and promote healthier food choices.**

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.

Thank you for the opportunity to provide comments on the USDA's proposed regulations that substantially revise the WIC Food Packages, published in the Federal Register on August 7, 2006. We look forward to working closely with USDA to fully implement the proposed rule and urge finalization of the rule by no later than the spring of 2007.

Sincerely,


Shirlee Runnings
Program Director



WASHINGTON COUNTY HEALTH DEPARTMENT

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October 31, 2006

NOV - 1 2006

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

LA 287

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

Dear Ms. Daniels

I am writing to thank USDA/FNS for its efforts in bringing the WIC food package in alignment with the 2005 US Dietary Guidelines and other national nutrition guidance. I support USDA's proposal to revise the WIC food package and encourage USDA to finalize a rule as soon as possible. I am respectfully offering additional feedback and suggestions for improvement of the proposed changes as follows.

Exclusively Breastfeeding Women (Food Package VII): I am concerned that the proposed changes are not enough to encourage breastfeeding and are even punitive if a mother is in need of a small amount of formula during the first few weeks or must return to school/work.

Suggestions:

- Allow a small amount of formula for a breastfeeding woman in the amount of 8 oz a day in the first month of life.
- Allow partial formula of 16 oz a day from months 2-12. The mother may be reduced to food package V at this time.
- Continue to identify a mother as partially breastfeeding up to her infant's first birthday with a reduction to a postpartum food package (package VI) if she receives more than 16 ounces of formula a day.
- Add yogurt and \$2 additional in fruit and vegetable vouchers to enhance package VII above and beyond that of either V or VI.
- Disallow fish in pouches as this will increase the cost of the package with no difference in nutritional value. This savings may also be used to enhance the package as requested in the preceding bullet.
- Allow an exclusively breastfeeding woman who becomes pregnant to receive 1.5 times food package VII to meet her increased needs.
- Allow an exclusively breastfeeding woman who is tandem nursing an infant and an older sibling to receive 1.5 times food package VII to meet her increased needs.
- Allow a partially breastfeeding woman who becomes pregnant to receive food package VII if she continues to partially breastfeed.

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Milk and Milk substitutions (packages III-VII): I am appreciative of the proposed substitutions to the milk offered. I feel that this will enhance client variety and understanding of lifelong healthy eating habits. However, I am concerned about the inability to make substitutions to the type (i.e. % fat) of milk offered in situations that may require more kilocalories (ex. Failure to Thrive or Underweight pregnant woman with poor weight gain).

- Allow state's the discretion to allow whole milk for clients over 2 years in situations where extra calories are warranted and 2% reduced fat milk as an option for children 12-23 months when approved by a CPA/RD.
- Remove the doctor's note requirement for soy milk/tofu as this is a burden on the client that may require paying a co-pay depending on the client's form of medical insurance. Furthermore it is not necessary as clients may purchase this on their own.
- Amend the requirements for soy milk beverages to 6 grams protein and 250 milligrams of potassium per 8 ounce serving to allow already existing soy beverages to be included.

Allowable Cereals and Whole Grains (packages III-VII): I am concerned that the requirement for all cereals to be $\geq 51\%$ whole grain will limit client choices and acceptability leading to a decrease in iron intake. Furthermore, participant whole grain consumption will already be addressed with the proposed addition of whole grains to the food package.

- Leave cereal requirements as they are with the current food package.
- Allow state discretion in determining the best way to implement the whole grains (and allowable substitutions) based on what works best for them.

Fruits, vegetables and juice (packages III-VII): I am thrilled with the offer of fruits and vegetables to improve client intake. My concerns lie with the administrative burden placed on clinics having to print vouchers in \$2 increments, the client having to run each voucher as a separate transaction at the store, and the fiscal burden caused when the vouchers are processed through the bank. All of this in addition to the burden already being placed on the client to: a.) add the price per pound for fresh produce b.) determine how much they are actually purchasing and c.) remain under the \$2 increment. Finally, although I understand and agree with the reduction in juice – I am concerned that clients will simply replace their WIC juice with a sweetened, artificially flavored drink which will increase non-nutritive calorie intake and dental caries.

- Allow states to determine their own dollar denomination based on what is best for them.
- Provide guidance for both client and vendor education on the best way to initiate a cash voucher system for fresh produce.
- Consider a different mechanism for delivery such as coupons rather than a voucher.

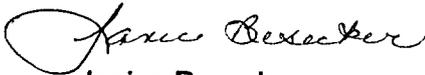
Infants (packages I and II): While I recognize the medical and scientific reasoning for the proposed changes to the infant food packages I am concerned about the reality of the impact this will have the WIC population. Providing jarred fruits and vegetables implies that this is necessary in order to properly feed an infant. Clients may infer that jarred infant food is recommended over preparing your own infant food. Additionally, decreasing the amount of formula at the same time we begin to provide solid foods implies that clients should automatically begin increasing solid food intake with no timeline for a transition. Finally, I am concerned that the decrease in formula will cause an increase in early cow's milk introduction. The net effect of these changes will be misinformation going to the clients, an increase in anemia in an already at risk population, and an increased cost to the WIC program.

- Offer a cash voucher for fruits and vegetables so clients can be encouraged to prepare their own infant food.

- Allow baby food grinders to be purchased with food dollars.
- If we must give jarred baby food then I would prefer it only from 6-8 months with a cash voucher from 9-12 months. Allow an option of a cash voucher at 6 months for those parents who prefer to prepare their own food.
- Reduce the amount of infant baby meat for exclusively breastfed babies as this is unrealistic for them to consume a jar a day and not likely to entice mother's to continue to breastfeed. Furthermore, the provision of infant baby meats is not culturally sensitive to our families that keep kosher (as there are no kosher baby meats currently available).
- Allow applesauce, 100% fruit sauces, and yogurt for infants 9-12 months to aid in texture transition to adult table foods.
- Leave the amount of formula for a fully formula fed infant at 31 cans of concentrate per month.
- Allow low iron infant formula with medical documentation and CPA/RD approval when medically indicated (ex. iron storage diseases, short term after blood transfusions, etc.)
- Allow state discretion for distribution of powdered formula and jarred baby foods. The proposed distribution would only confuse clients when their amount changes monthly.

I would like to thank USDA for all of their hard work in enhancing the food package to improve the health of the nation's most nutritionally vulnerable and I look forward to implementing the new food packages.

Sincerely



Janice Besecker
Maryland WIC Program – Washington County
Local Agency Coordinator

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OCT 30 2006

October 30, 2006

To: Patricia N. Daniels, Director

From: Janet Allen

Thank you for the opportunity to comment on the new proposed rule: Revisions in the WIC Food Package (USDA-FNS 7 CFR part 246). I enthusiastically endorse the addition of new foods to the package that will enhance the nutritional value of the package and appeal to a broader cultural population. I am concerned though that the new regulations are too restrictive and do not take into account many of the program innovations that have been advocated jointly by FNS and WIC staff through RISC and VENA initiatives. RISC has scientifically defined the nutrition risks that can be used nationally in the program. VENA challenges WIC staff to be sensitive to client needs and design program benefits to fit those needs. Parts of this rule related to implementation issues appear to be not congruent with these new initiatives

1. Although nutrient needs may change on paper at birth; 4 and 6 months, mothers and babies do not know that. It will be very difficult for WIC staff to explain and mothers to understand why the quantity of formula varies from month to month. With 3 month issuance infants are generally seen at 3 and 6 months. The infant assessment at 6 months is a better opportunity to make changes since more time is generally allotted. States should be allowed the option of not changing the amount of formula at 4 months. The proposed method of "rounding" formula amounts will also cause confusion and misunderstandings. A better method should be found.
2. Since RISC, the nutrition risks are more scientifically exact. Growth grids for premature infants are adjusted in order to better tailor the counseling and assessments to the needs of premies. These rules do not provide leeway for the nutrition professional to adjust the food package based on the developmental stage of a premature infant (i.e. delay cereal and baby food or adjust the formula quantity.).
3. These rules contain unrealistic expectations of health care providers. It is not within the realm of experience of most health care providers to determine how much tofu or cheese should be provided by WIC. RISC could easily define in the risk definition what conditions could possibly be harmed by the addition of a specific food and require approval from the health care provider before it is added to the food package. This would be a relatively small number of conditions. WIC should retain the ultimate decision to determine the amounts to provide. WIC professionals should also be able to decide if soy is an appropriate milk without having to obtain the blessing of a health care professional. It will add to the burden of both the client and the health professional and should be within the realm of expertise of a trained WIC professional.
4. The inability to provide any formula during the first month post partum will provide a large contingent of "closet" breast feeders as well as causing major difficulties in clinics. We have a copy of a hand out we used many years ago on how to mix evaporated milk formulas. We need some flexibility to be able to provide some formula in cases of true emergencies and medical problems. I would not like to go back to evaporated milk formulas. The mothers who would be most harmed are those who are truly making an effort to breast feed but are not able. At least one can of formula should be allowed.

5. The purpose of completing a nutrition assessment as defined by VENA is to tailor counseling, food package and referrals to the needs of the participants. The proposed rules make tailoring of the food package difficult for certain categories of participants. The nutrition professional will no longer be able to provide full fat milk for the very underweight child or one diagnosed with failure to thrive. The tone of the proposed rule implies that tailoring is not a recommended practice. Tailoring based on a complete nutrition assessment and individual need should be encouraged

I would like to assure you again that I enthusiastically support the changes in the food package and hope they can be implemented as soon as possible