

OSLA-173

From: Leslie.D Fitzpatrick [Leslie.D.Fitzpatrick@state.tn.us]
Sent: Tuesday, October 17, 2006 11:29 AM
To: WICHQ-SFPD
Subject: WIC Food Package Rule

I agree with all the proposed changes except the changes regarding the introduction of meats, fruits and vegetables for fully formula fed vs. breastfed infants. We are always preaching to our clients how much better breastfeeding is compared to formula fed infants. Yet, women who decide to bottlefeed will receive no meats and half the amount of fruits and vegetables for their infants? I am completely in approval that all women should breastfeed if possible. I don't agree, however, that the food package for meats, fruits and vegetables should differ between breastfed and bottlefed infants.

Sincerely,

Leslie Fitzpatrick, RN

Leslie Fitzpatrick
District Nursing Supervisor
Smith, Clay, Jackson and Macon Co.
Department of Health
615-735-0242

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To promote, protect and improve the health of persons living in, working in, or visiting the State of Tennessee!

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OSLA-176

From: no-reply@erulemaking.net
Sent: Thursday, October 19, 2006 1:19 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: Kathey
Last Name: Kakiuchi
Mailing Address: 2850 Breslauer Way
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Country: United States
State or Province: CA
Postal Code: 96001
Organization Name: Shasta County Public Health

Comment Info: =====

General Comment: Overall, the changes to the food package are positive. More fruits and vegetables and less saturated fats is a great thing for women and children. And I definitely 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.

I would like you to consider deleting the provision that makes soy beverages available by prescription only. There are quite a few vegan moms and children in the program and this would be an unnecessary burden to clients to have to bring in a prescription for these products. Or alternatively, consider allowing the Registered Dieticians who work in the WIC programs to be able to approve these purchases.

I would also like you to consider allowing the vouchers for fruits and vegetables to be used at local Farmers Markets. And for fully breastfeeding moms, I would like to see the vouchers increased to \$10.00.

OSLA-179

From: MICHAEL DEBORAH HENDERSON [DHENDERSON5168@MSN.COM]

Sent: Friday, October 20, 2006 8:14 AM

To: WICHQ-SFPD

Subject: docket ID number0584-AD77,WIC food packages rule

I work at the Lewis & Clark City-County Health Department in Helena, Montana. Regarding the change in WIC food package for infants. Please do not allow purchase of commercial jarred infant food! Jarred infant food costs 5-8 times more than commercially jarred or fresh adult food. Commercial jarred infant foods are marketed and shelved to lead parents towards the use of unhealthy and expensive "toddler" foods. Single ingredient jarred foods are shelved together with numerous unhealthy and overpriced jarred alternatives. If WIC provides infant meat and produce, it will effectively encourage parents to purchase the jarred desserts, mixed dinners, and bottled "infant juices".

OSLA-183

From: Jones-Ruffin, Nadine [njonesruffin@CambridgeMA.GOV]
Sent: Wednesday, October 25, 2006 12:53 PM
To: WICHQ-SFPD
Subject: comments

To whom this may concern.

I am voting yes to the propose foods to the wic program. I believe that the USDA should become diverse to serve new dietary needs of all families.

"Denial = The Glue that Keeps Us Stuck."

Nadine M. Jones-Ruffin, A.S.
Family Programs Coordinator
70 Rindge Ave
c/o Peabody School
Cambridge, MA 02140
617-349-6967
Fax 617-349-6386
email: njonesruffin@cambridgema.gov

OSLA-184

From: Pamela Garwood [pgarwood@pittsfield.net]
Sent: Tuesday, October 24, 2006 12:56 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD 77; WIC Food Packages Rule

To Whom It May Concern,

The parents of the Pittsfield Even Start would like to submit their comments of what they would like WIC to add to their food package: jars of baby food, bread, yogurt, cottage cheese, fruit, vegetables, pasta, rice and potatoes.

Thank you,
Pam

Pam Garwood
Even Start Coordinator
10 Lyman Street
Pittsfield, MA 01201
(413) 448-9819
pgarwood@pittsfield.net

OSLA-185

From: srichards@plumasruralservices.org
Sent: Tuesday, October 24, 2006 2:40 PM
To: WICHQ-SFPD
Subject: Comments Re: Docket ID # 0584-AD77, WIC Food Packages Rule

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

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

Dear Ms. Daniels,

I write to express my support of the proposed changes in the WIC Food Packages to be consistent with the 2005 Dietary Guidelines for Americans and align with the American Academy of Pediatrics infant feeding recommendations. I believe the following to be vital steps not only in the meeting of optimal nutritional requirements for WIC families, but also in addressing the disparity along economic lines of health between our nation's wealthiest & healthiest and our nation's poorest in both those categories. Therefore, I see the below as the foundation of establishing healthy lifestyles for our nation's young:

? add fruits and vegetables, and whole grain products to the food packages for the first time,

? reduce the amount of certain foods (milk, cheese, eggs, and juice) in order to align with the Guidelines,

? provide stronger incentives for continued breastfeeding by providing less formula to partially breastfed infants and providing additional quantities/types of food for breastfeeding mothers,

? replace juice for infants with infant food fruits and vegetables starting at six months, and

? provide lower fat milk for children over 2 years and adults.

These changes, when implemented, will strengthen the WIC program's ability to improve the nutrition and health status of millions of families. Rhetoric aside, we really do owe it to these families to invest in their health; the benefits to them will be great, and to society's future health and economy, perhaps greater.

Sincerely,
Sarah Richards

--

Sarah Richards
Program Resource Developer
Plumas Rural Services
530-283-3611
Serving People, Strengthening Families, Building Communities

OSLA-209

From: WebMaster@fns.usda.gov
Sent: Wednesday, November 01, 2006 2:34 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Letitia Henderson-Souza
EMAIL: shorteash@yahoo.com
CITY: Oakland
STATE: CA
ORGANIZATION: Alameda County Public Health Department
CATEGORY: Other
OtherCategory:
Date: November 01, 2006
Time: 02:33:59 PM

COMMENTS:

I agree with the proposed changes and would like to suggest that there a provision for partnerships with local Farmers Markets. This way WIC Participants could access fresh fruits and vegetables and support local farming industry's.

OSLA-210

From: Ambroz, Teresa [Teresa.Ambroz@CO.DAKOTA.MN.US]
Sent: Thursday, November 02, 2006 2:35 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC food Packages Rule

I am writing in my support of the recommended improvements to the WIC food packages. It is important to ensure that those relying on this program have the opportunity to follow a healthy diet for their long-term health and the health of their children. Including whole grains, fortified soy milk and fruits and vegetables is an important step in the right direction.

Excess juice intake can contribute to poor nutrition and obesity in children. Although I do not work in a WIC clinic, I have worked many years in a childhood obesity clinic. Limiting juice and encouraging fruits, vegetables and whole grain foods will make a difference in addressing the obesity epidemic in this Country.

Thank you for considering these important improvements.

Teresa Rondeau-Ambroz, RD, LD
Community Health Specialist
Dakota County Public Health
1 Mendota Road W Ste 410
West St. Paul, MN 55118-4771
651-554-6099

teresa.ambroz@co.dakota.mn.us

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OSLA-212

From: Toni Kuehn - FCCTF [tkuehn@fcctf.org]
Sent: Thursday, November 02, 2006 12:47 PM
To: wichq-sfpd@fns.usda.gov.
Subject: WIC Food Packages Proposed Rule

Dear Ms. Daniels:

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

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

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.

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

-- I 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 support 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,

Toni Kuehn, MSW
Program Manager
Growing Healthy Families
Franklin County Children's Task Force
113 Church Street
Farmington, ME 04938
207-778-6960



OSLA-214

email 11-03-06 from Zilge, Shar [Shar.Zilge@CO.DAKOTA.MN.US]; on behalf of; Adams, Pat [Pat.Adams@CO.DAKOTA.MN.US]

PUBLIC HEALTH DEPARTMENT

“Partnering to build healthy families and healthy communities”

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November 2, 2006

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

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

Dear Ms. Daniels:

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

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 changes 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.

While the majority of the proposed changes would improve and enhance the WIC food package, we recommend the following adjustments:

- Implement fully breastfeeding, partially breastfeeding and fully formula feeding woman's food package changes concurrently. We believe that delaying the implementation of the partially breastfeeding package will result in many women simply choosing to formula feed.

- Increase the dollar amount of fruits and vegetables provided to the fully breastfeeding woman to \$10 to match the IOM recommendation. This would provide further incentive and support for breastfeeding.
- Change the minimum protein and potassium standards for calcium-fortified soy-based beverages to 6.25 grams of protein and 250 milligrams of potassium per 8 ounce serving, as there are no calcium-fortified soy-based beverages on the market that meet the proposed protein and potassium standards.

Again, Dakota County Public Health enthusiastically and strongly supports the proposed rule. We are convinced that it will serve to 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.

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

Sincerely,

A handwritten signature in black ink that reads "Patricia Adams". The signature is written in a cursive, flowing style.

Patricia M. Adams, MPH, BAN, RN
Public Health Director



OSLA-215

From: WebMaster@fns.usda.gov
Sent: Friday, November 03, 2006 2:37 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Jodi Field
MAIL: jfield@co.juneau.wi.us
CITY: Mauston
STATE: WI
ORGANIZATION: Juneau County Health Department
CATEGORY: IndividualHlthProfessional
herCategory:
Date: November 03, 2006
Time: 02:37:23 PM

COMMENTS:

I would like to relay my support to the proposed changes to the WIC package. The addition of fruits and vegetables is wonderful to encourage families to increase their consumption of those important nutrients. The deletion of juice is a needed change also. My only concern would be the restriction that would prevent breastfeeding mothers to receive any formula in the first month. I am a big supporter of breastfeeding and understand the intention to increase breastfeeding rates. However, in my experience working in both hospital OB and public health programs in conjunction with WIC, I think there will be many women that may not even attempt breastfeeding if there is no possibility of receiving formula if supplementation is needed. I think in the least exceptions should be allowed for mothers who present with a milk supply problem that requires supplementation. Although the intention is good, I am concerned that in reality it may cause breastfeeding rates to decrease in this population.

OSLA-216

From: Colleen Fillmore [CRFillmore@sde.idaho.gov]
Sent: Friday, November 03, 2006 7:58 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

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

I am sending this email to show my support to the proposed rule that is based on the published recommendations (April 2005) of the Institute of Medicine. These recommendations were based on extensive scientific review of dietary intakes and the nutritional needs of women, infants and children.

The proposed changes are in line with current dietary recommendations working towards improving overall health through reduction in obesity and other diet-related chronic diseases.

Thank you

Sincerely

Colleen Fillmore

Colleen Fillmore, PhD, RD, LD
CNP Director
Child Nutrition Programs
Idaho Department of Education
P. O. Box 83720
Boise, Idaho 83720-0027
Ph: 208-332-6820
Fax 208-332-6833
crfillmore@sde.idaho.gov

Eskerrik asko (Thank you in Basque)

OSLA-217

Docket ID Number 0584-AD77, WIC Food Packages Rule
From: Frohmberg, Eric
[Eric.Frohmberg@maine.gov]
Sent: Friday, November 03, 2006 2:13 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

The Maine Center for Disease Control, Environmental and Occupational Health Program is submitting comments on the proposed rule "Revisions in the WIC Food Packages" posted in 71FR151. In particular, we would like to comment on section M., Canned Fish.

The proposed rule states "As recommended by the IOM, this proposed rule would authorize 30 ounces of a variety of canned fish that do not pose a mercury hazard this proposed rule would authorize the following varieties of canned fish - light tuna, salmon, and sardines. The Department seeks comments on additional canned fish to offer in Food Package VII. This proposed rule would clarify that fish packaged in foil bags ("pouches") are WIC eligible."

While light tuna, salmon and sardines may, from a population perspective, be some of the more commonly consumed low mercury canned seafood products, there are other seafood products that are low in mercury, that may be important within certain subpopulations, or that should be offered as an alternative. In particular, we would like to recommend the addition of canned mackerel, canned clams, canned mussels, canned crab, canned oyster and canned shrimp to this list.

These canned seafood products fall into two general categories - those that have data on mercury concentrations in these canned products, and those that do not, but have fresh tissue analysis suggesting canned products would have low mercury concentrations as well.

Canned seafood products that have low levels of mercury include canned mackerel and canned (or jarred) herring. Canned mackerel is typically Jack or Atlantic Mackerel, both of which are known to be low mercury fish (and high in omega-3 fatty acids). Additionally, two papers have evaluated mercury content of canned mackerel specifically and have found low levels of mercury (Ikem and Egiebor 2005, and Shim et al. 2004). Herring is another product that can be found canned (and jarred in the form of pickled herring). Herring also are low in mercury, high in Omega-3 fatty acids and have data specific to that product (Ikem and Egiebor 2005).

Other canned seafood products that we would recommend to be included in the list of available choices include products for which the mercury content of the fresh, uncanned seafood is known to be low. These products include, clams, crabs, lobster, oysters and shrimp (NOAA 2004). Canned mussels are also a seafood product that can be found

canned, and have higher levels of omega-3 fatty acids than many other canned shellfish. Of these products, clams, mussels, oysters, shrimp and crabs are clearly low in mercury (FDA 2006). Canned lobster is more problematic in that there are some older data from 1978 that shows average levels of mercury in lobster roughly equivalent to levels found in canned white tuna. More recent data (FDA 2006) suggests levels in lobster are significantly lower (closer to canned light tuna).

As consumption of seafood by the US population as a whole is low, the Maine Center for Disease Control, Environmental and Occupational Health Program would like to provide as many options as possible to allow seafood consumption.

FDA (2006). Mercury levels in commercial fish and shellfish.
<http://www.cfsan.fda.gov/~frf/sea-mehg.html>

Ikem, A., and NO Eagiebor. 2005. Assessment of trace elements in canned fishes (mackerel, tuna, salmon, sardines, and herrings) marketed in Georgia and Alabama (United States of America). *Journal of Food Composition and Analysis*. 18:771-787

Shim et al. 2004. Mercury and Fatty Acids in Canned Tuna, Salmon, and Mackerel. *Journal of Food Science* 69(9):C681-C684.

NOAA (2004). Fisheries of the United States 2003.
<http://www.st.nmfs.gov/st1/fus/fus04/index.html>

Eric Frohmberg
Toxicologist
Environmental and Occupational Health Program
Maine CDC
11 State House Station
Augusta, ME 04355
207-287-8141
866-292-3474 (tollfree in Maine)

OSLA-218

From: WebMaster@fns.usda.gov
Sent: Friday, November 03, 2006 2:33 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Maria Rojo de Steffey, Commissioner
EMAIL: district1@co.multnomah.or.us
CITY: Portland
STATE: Oregon
ORGANIZATION: Multnomah County, Oregon
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 03, 2006
Time: 02:32:31 PM

COMMENTS:

Dear Director Daniels:

As a Commissioner for Multnomah County, Oregon, I am writing you to voice my support for the proposed new WIC food package rules. I encourage the USDA to act quickly and move forward with the process of bringing a new, healthier food package to our communities.

The Women, Infants and Children Program (WIC) is a federally-funded supplemental nutrition program targeting a low income, nutritionally at-risk population. I endorse your mission to provide a monthly package of specific food vouchers, redeemed at grocery stores. Your program is an integral part of our county and state's public health efforts, reaching families most in need of preventive health services. In 2005, 36% of pregnant women and 21,483 infants and children under the age of five in Multnomah County were served by the WIC Program.

I understand you, the United States Department of Agriculture (USDA), are proposing to update the WIC Food Packages Rule to:

- improve the health and nutritional quality of the foods offered,
- expand cultural food options, and
- increase choices for the women, infants, and children served by the program.

The new WIC food packages will better reflect the Dietary Guidelines and current nutritional science by moving to low-fat milk and whole grain cereals, and adding fruits,

vegetables, whole grain bread, corn tortillas, and the option of soymilk and tofu to the grocery lists for 8 million low-income mothers, infants, and children, across the country. The proposed food package rule also builds in protections safeguarding the nutritional value of the new food packages for all participants by strictly prohibiting state level cuts to the new food packages.

Since the foods offered in WIC were last revised, there has been an explosion of knowledge related to nutrition and health, as well as a growing obesity problem in this country. The proposed changes, particularly the introduction of fresh fruits and vegetables, will not only help mothers and children maintain a healthy weight and make healthy food choices, but will also encourage a lifetime of healthier eating for the future.

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

- Increase the fruit and vegetable benefit by \$2 to fully meet the recommendations of the Institute of Medicine for women and children in WIC
- Allow WIC participants to choose the kinds of fruits and vegetables they want
- Allow WIC participants to choose healthy and culturally-appropriate cereal by revising the proposed cereal standard to include whole grain corn-based (i.e. corn flakes), rice (i.e. puffed rice), and bran (i.e. bran flakes) WIC cereals.
- Remove the requirement for children to have a prescription to obtain soy milk from WIC.
- Maximize access to Farmers' Markets and the WIC Farmers' Market Nutrition Program for local seasonal fruits and vegetables.
- Establish WIC state advisory councils of stakeholders to help support and inform the planning and implementation of the new food package.

Thank your for your consideration and support.

Maria Rojo de Steffey

OSLA-219

email 11-03-06 from Patricia O. Race, MEd, RD, CDN por01@health.state.ny.us

November 3, 2006

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

Dear Ms. Daniels:

Thank you for the opportunity to provide comments on the proposed food package changes for the WIC Program. The New York State Department of Health, Division of Nutrition has long awaited these changes, as they support Eat Well Play Hard, our childhood obesity prevention initiative. For over ten years, the Division of Nutrition has promoted three core strategies in the USDA funded programs we administer: the promotion of low-fat and fat-free milk, increased vegetables and fruit, and increased physical activity.

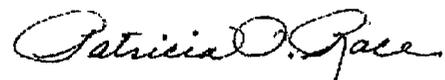
We congratulate the Food and Nutrition Service for the progress it has made toward incorporating the Institute of Medicine's recommendations, particularly those that will assist us in promoting our Eat Well Play Hard strategies. The following reflects our comments on the proposed rule:

- We support the delay in the introduction of complementary foods and the changes in age requirement and replacement of juice with infant fruit and vegetables in Food Packages I and II.
- Given that most Americans consume less than one half of the fruits and vegetables recommended in the 2005 Dietary Guidelines for Americans, we strongly support adding more fruits and vegetables to the WIC food packages for infants, children and women. We recommend that states be allowed to choose the fruit and vegetable benefit level. A survey conducted in NYS of all WIC vendors indicated that 98% of vendors feel that a \$5.00 check is just right or too low. Providing participants an option of canned, frozen, dried or fresh vegetables and fruits should address any concerns related to spoilage or storage.

- Providing only fat reduced milk to women and children age two and older is a significant improvement over the current recommendations which include whole milk. However, we recommend that the Food and Nutrition Service consider revising this recommendation to be consistent with those of the American Academy of Pediatrics and the American Heart Association, which promote the use of low-fat or fat-free milk and dairy products for adults and children over the age of two.

Again, thank you for the opportunity to provide comments on the proposed rule. We look forward to working with the WIC Program to prepare participants for the changes, and anticipate that the changes will strengthen our Eat Well Play Hard efforts.

Sincerely,

A handwritten signature in cursive script that reads "Patricia O. Race".

Patricia O. Race, MEd, RD, CDN
Director
Bureau of Nutrition Risk Reduction

OSLA-220

email 11-03-06 from Susan M. Barber [smb05@health.state.ny.us]

November 3, 2006

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

Dear Ms. Daniels,

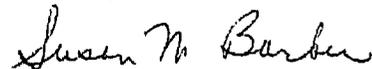
The New York State Department of Health's Hunger Prevention and Nutrition Assistance Program (HPNAP) is pleased to provide this letter of support for the Proposed Rule for Revision in the WIC Food Packages. HPNAP, in partnership with emergency food relief organizations, is dedicated to improving the health and nutrition status of people in need of food assistance in New York State. The program accomplishes this by providing funding and other support to enhance the accessibility and availability of safe and nutritious food to persons requesting assistance through 2,500 volunteer-operated local food pantries and soup kitchens. Currently HPNAP supports 120 million meals annually to a food insecure population that is 42 percent children.

In July 2005, HPNAP instituted minimum purchasing requirements for fresh produce (5% of HPNAP budget line for purchased food) and 1% milk (1% of the HPNAP budget line for purchased food) to address the Department of Health's Obesity Prevention Initiative. Approximately \$1.2 million has been spent this year on fresh produce and 1% milk.

HPNAP is particularly supportive of the inherent nutrition messages in the foods available to women and children through the revised food packages. The decrease in monthly amounts of milk, juice, eggs and cheese and the increase in monthly amounts of vegetable, fruits, whole grain cereals and bread will greatly assist our local nutrition staff in providing consistent nutrition messages that are well supported by the medical/scientific community. Our emergency food relief organizations currently promote the WIC Program and encourage mothers and caregivers to contact the local WIC clinic. The revised packages will present a new opportunity to reintroduce our food insecure young families to a new WIC Program.

Thank you for the opportunity to submit comments on the proposed rule.

Sincerely,



Susan M. Barber, RD, MA, CDN
Director
Hunger Prevention and Nutrition
Assistance Program

OSLA-221

11-03-06 email from peb05@health.state.ny.us

November 3, 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, Virginia 22302

Dear Ms. Daniels:

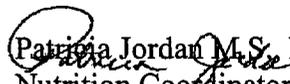
On behalf of the New York State Department of Health, Division of Nutrition's Just Say Yes to Fruits and Vegetables Project, I would like to share comments and recommendations on the proposed rule.

Just Say Yes to Fruits and Vegetables (JSY), a Food Stamp Nutrition Education Program, has been providing nutrition education to food stamp clients in New York State for ten years. The project, in partnership with organizations that serve the hungry, is dedicated to improving the health and nutritional status of food stamp eligible populations in New York State. The JSY program strives to empower families to eat more fruits and vegetables by conducting interactive fruit and vegetable workshops. These workshops are conducted at community sites for food stamp clients, including WIC sites.

JSY supports the inclusion of fruits and vegetables in any variety and the addition of legumes in food packages. Our lesson plans and over 75 recipes have been developed for fresh, frozen or canned fruits, vegetables and legumes. The inclusion of these improvements to the WIC packages, paired with JSY workshops, will strengthen our ability to promote healthy food choices and make strides in improving the health of New Yorkers.

We appreciate the opportunity to show our support of these proposed recommendations.

Sincerely,


Patricia Jordan M.S., R.D., C.D.E., C.D.N.
Nutrition Coordinator
Just Say Yes to Fruits and Vegetables

OSLA-222

ChangesFrom: Ide, Gail [gide@state.pa.us]
Sent: Friday, November 03, 2006 10:39 AM
To: WICHQ-SFPD
Subject: Changes

Fantastic! When I teach nutrition to parents of young children of disparate populations, I get told WIC tells us the same thing but that doesn't help us. The changes will back up the words. Thank you.

Gail D. Ide, RN
Maternal and Child Health Consultant
PA Department of Health
Northeast District Office
665 Carey Avenue, Suite 5
Wilkes-Barre, PA 18706-5485
Phone: (570) 826-2062 Fax: (570)826-2238
e-mail: gide@state.pa.us

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OSLA-224

From: WebMaster@fns.usda.gov
Sent: Monday, November 06, 2006 7:01 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Susan B. Foerster, MPH, RD
EMAIL: Sfoerste@dhs.ca.gov
CITY: Sacramento
STATE: CA
ORGANIZATION: Cancer Prevention and Nutrition Section, California Department of Health Services
CATEGORY: Other
OtherCategory: State Agency (non-WIC)
Date: November 06, 2006
Time: 07:01:02 PM

COMMENTS:

November 6, 2006

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

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

Dear Ms. Daniels:

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

The programs of CPNS are funded by the United States Department of Agriculture through FSNE which strives to improve the health of low-income families through the

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

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

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

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

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

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

- We strongly encourage FNS to adopt and fund the recommendations of the Institute of Medicine's (IOM) expert report: "WIC Food Packages: Time for a Change" and provide WIC moms and children with \$10/month and \$8/month, respectively, cash-value voucher for fruits and vegetables. These amounts will help moms and kids eat at least one additional serving of fruit or vegetable each day – a critical objective for reversing the obesity epidemic and for public health.

- In particular, we encourage FNS to urge state and local WIC agencies to use the opportunities provided by the proposed Food Package changes

to emphasize increased consumption of fruits and vegetables in their nutrition education activities. The importance of nutrition education is stressed throughout the proposed rule and we suggest that nutrition education efforts coordinate and compliment those provided through FSNE and Child Nutrition programs.

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

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

Sincerely,

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

OSLA-225

From: Kim Kandarian [Kim.Kandarian@ventura.org]
Sent: Monday, November 06, 2006 5:28 PM
To: WICHQ-SFPD
Subject: "Docket ID Number 0584-AD77, WIC Food Packages Rule,"

Attachments: Kim Kandarian.vcf

I fully support a change in the current policy.

Kimberly Kandarian, MSN, RN, PHN
Coordinator
Communicable Diseases Office
Ventura County Public Health Department
2240 E Gonzales Road Suite 220
Oxnard, CA 93036

Main Office Phone (805) 981-5201

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e-mail:kim kandarian@ventura.org

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OSLA-226

From: WebMaster@fns.usda.gov
Sent: Monday, November 06, 2006 2:14 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Karen Gidden
EMAIL: karen_gidden@doh.state.fl.us
CITY: Brooksville
STATE: FL
ORGANIZATION: Hernando County Health Department
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: November 06, 2006
Time: 02:13:57 PM

COMMENTS:

I fully support the proposed changes. I have worked in WIC and also been a recipient of WIC many years ago. This should have been done many years ago to prevent our now epidemic of obesity.

OSLA-227

From: no-reply@erulemaking.net
Sent: Monday, November 06, 2006 2:11 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: John
Last Name: Melick
Mailing Address: PO Box 2327, 6 Gauntt Place
City: Flemington
Country: United States
State or Province: NJ
Postal Code: 08822-2327
Organization Name: Hunterdon County Board of Agriculture

Comment Info: =====

General Comment:

November, 6, 2006

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

Dear Patricia:

The Hunterdon County Board of Agriculture strongly urges the USDA to reconsider the proposed rule changes for the WIC program. Our county is represented by many types of agriculture and one of the more successful segments of our agriculture community is the fresh market produce farmers. Hunterdon County is struggling to maintain its rural

character because of our location between New York City and the Lehigh Valley in Pennsylvania. Development pressure has eased out many of the unprofitable agriculture sectors in our area. The many farmers in our county who participate in urban farmers markets stand to lose a significant income if WIC rules are modified to allow redemption at supermarkets.

This will certainly damage our agriculture community and contribute to a loss of local farms.

Please reconsider these rule changes. This will only contribute to the loss of the local farm and farm families while aiding the proliferation of the corporate farms that dominate the rapidly consolidating agricultural landscape. In this day and age of heightened food security concerns, I am sure that the USDA would want to do everything possible to reverse this trend and keep the small farmer profitable.

Very truly yours,

John V. Melick, 1st Vice-President
Hunterdon County Board of Agriculture

OSLA-228

From: Cheryl Kikkert [kikkertc@mt.gov]
Sent: Monday, November 06, 2006 1:32 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

November 6, 2006
Director, Supplemental Food Programs Patricia Daniels
3101 Park Center Drive
Room 528
Alexandria, VA 22302

Dear Patricia Daniels,

FNS/USDA
3101 Park Center Drive, Room 528
Alexandria, VA 22302
RE: Docket ID Number 0584-AD77

Dear Ms. Daniels:

I am writing to comment on USDA's proposed new WIC food packages rule because many of the changes will improve the health and nutritional quality of the foods offered however I have concerns with the following recommendations.

I don't agree with the reduction in milk being suggested for the women and children in WIC. We have heard for years about the crisis in consumption of calcium and vitamin D, yet the proposed regs represent just that! Since skim milk and low fat milk products are available to WIC clients throughout the states, why in the world would we want to compromise further consumption of this excellent nutritious food choice.

I support the recommendation that reflect inclusion of fruits, vegetables, whole grain bread, corn tortillas, and the option of soymilk and tofu, and moving to skim and low-fat milk and whole grain cereals.

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

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

Maintain the current level, or increase the quantity of fluid milk (not cheese) in the food package for women and children.

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

Allow WIC participants to choose the kinds of fruits and vegetables they want.

Allow WIC participants to choose healthy and culturally appropriate cereal by revising the proposed cereal standard to include whole grain corn-based (i.e. corn flakes), rice (i.e. puffed rice) and bran (i.e. bran flakes) WIC cereals.

Maximize access to Farmers' Markets and the WIC Farmers' Market Nutrition Program for local seasonal fruits and vegetables.

Establish WIC state advisory councils of stakeholders to help support and inform the planning and implementation of the new food package.

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

Sincerely,

Cheryl Kikkert
Missoula Health Department
301 W Alder
Missoula, MT 59802

OSLA-230

From: Susan Loring [Susan.Loring@ventura.org]

Sent: Monday, November 06, 2006 5:44 PM

To: WICHQ-SFPD

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

I support the proposed new WIC foods changes. These changes will help the clients make healthy food choices easier and improve the health outcomes for future generations of WIC families.

I am a Public Health Nurse working with many WIC families in Ventura County, Calif.

Thank you,

Susan Loring, PHN

Program Coordinator

Ventura County Public Health

OSLA-231

Docket ID Number 0584-AD77, WIC Food Packages Rule
From: Nardella, Maria (DOH)
[Maria.Nardella@DOH.WA.GOV]
Sent: Monday, November 06, 2006 1:29 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

I am in favor of major changes to the WIC food packages for women, infants and children to help them have access to the healthiest diet possible.



Maria Nardella, MA, RD, CD
Manager
Children with Special Health Care Needs Program
Washington State Department of Health
MS 47880
(Phone: 360-236-3573
FAX: 360-586-7868
email: maria.nardella@doh.wa.gov
CSHCN Website: <http://www.doh.wa.gov/cfh/mch/cshcnhome2.htm>

The Department of Health works to protect and improve the health of people in Washington State.

OSLA-232

EMAIL 11-06-06 FROM Roslyn Windholz
Deputy General Counsel for Health
New York City Department of Health and Mental Hygiene
rwindhol@health.nyc.gov 212-788-5010

November 6, 2006

WICHQ-SFPD@fns.usda.gov
Docket ID Number 0584-AD77, WIC Food Packages Rule.

Regarding: 7 CFR Part 246 – Special Supplement Nutrition Program for Women,
Infants and Children (WIC): Revisions in the WIC Food Packages;
Proposed Rule.

To Whom It May Concern:

The New York City Department of Health and Mental Hygiene (DOHMH) has reviewed the proposed federal regulations governing the WIC food packages. The following express our specific concerns regarding the proposed regulations.

- (1) Proposed : §246.10 (e)(12) (Minimum requirements and specifications for supplemental foods).

The proposed WIC food package regulation requires that cereals have less than 21.2 grams of sugar/100g serving. This requirement would allow virtually all high sugar cereals, including Trix, Cocoa Puffs, Lucky Charms, and Oreos, all of which have minimal nutritive value. We recommend that the requirement be changed to allow only cereals with to less than or equal to 10 grams of sugar/100g serving. In addition, we recommend the inclusion of folic acid in cereal for pregnant and parenting women, especially during pregnancy.

- (2) Proposed: §246.10 (e)(10) (Maximum monthly allowances of supplemental foods in Food Packages IV through VII) and §246.10 (e)(11) (Maximum monthly allowances of supplemental foods for children and women with qualifying conditions in Food Package III).

The proposed WIC food package regulation in footnote 7 of Table 2 of section §246.10 (e)(10) states, "Reduced fat milks, as specified in FDA standards, i.e., 2% milk fat, are the only types of milk allowed for children \geq 24 months of age and women." Also, proposed WIC food package regulation in footnote 9 of Table 3 of §246.10 (e)(11) states: "Reduced fat milks (up to 2% milk fat) are the only types of milk allowed for children \geq 24 months of age and women."

We recommend that the proposed WIC food package regulations for milk fat follow the Dietary Guidelines for Americans (2005). The Dietary Guidelines for Americans (2005) recommend low-fat milk, which is defined as 1% or less, for everyone after age 2. Although 1% milk is reduced-fat, it is not low-fat. We recommend the proposed WIC food package authorize only milk with no more than 1% milk fat (for people ages 2 years and older).

(3) Proposed: §246.10 (e)(10) (Maximum monthly allowances of supplemental foods in Food Packages IV through VII) and §246.10 (e)(11) (Maximum monthly allowances of supplemental foods for children and women with qualifying conditions in Food Package III).

The proposed WIC food package §246.10 (e)(10) and §246.10 (e)(11) establishes the value of fruit and vegetables at levels of \$8 per month for women and \$6 per month for children. In September 2003, the Food and Nutrition Service (FNS) contracted with the National Academies' Institute of Medicine (IOM) to review the WIC food packages. IOM recommended to FNS that, "fruits and vegetables be provided at levels of \$10 per month for women and \$8 per month for children." We support IOM's recommended increase because the additional cash value encourages more consumption of fruits and vegetables.

(4) Proposed: §246.10 (e)(Food packages - breastfeeding)

The proposed WIC food package regulations on breastfeeding "would establish two infant feeding options for the first month after birth, either full breastfeeding or full formula-feeding. That is, formula would not be provided for fully or partially breastfeeding infants during the first month after birth." "The proposed revised food packages are designed to strengthen WIC's breastfeeding promotion efforts."

It appears that the proposed maximum infant formula, found in §246.10 (e), is tied to breastfeeding practice. For infants older than one month, FNS has proposed establishing 3 feeding options within each infant food package: fully breastfed, partially breastfed, and fully formula-fed categories; and each feeding option has a maximum formula allowance. Currently, under 'Food Package I – Infants 0 through 3 months', local WIC staff may tailor the amount of formula to reflect with individual participant needs, based on frequency of breastfeeding. The proposed WIC regulation in 'Food Package I – Infants birth through 5 months' sets a maximum formula amount for partially breastfed infants that is roughly half the maximum provided to fully formula fed infants.

See. 7 CFR §246.10 (e)(1)(ii)(B). We commend IOM's recommendation to FNS to reduce formula to partially breast-fed infants, to incentivize full breastfeeding, to enhance breastfeeding promotion and support, and to encourage exclusive breastfeeding with pumps and lactation support. We recommend that WIC counseling of partially breastfeeding women include a calculation of infant's consumption, with formula allocation based on level of consumption.

Regarding the FNS' proposal to not have a 'partially breastfed' category for infants under one month, the proposed regulation, §246.10 (e)(1)(ii), states infant formula is not provided during the first month after birth to fully breastfed infants; infants under one month will be recognized as either fully breastfed or fully formula-fed; and no infant will be prescribed formula in the amount specified by Food Package I for partially breastfed infants until he or she reaches one month. We do not support this part of the regulation because women who produce insufficient milk will be forced to opt for the fully formula-fed categorization, rather than supplementing the breast milk they have available with formula. While exclusive breastfeeding is the best, partial breastfeeding has greater health benefits than full formula feeding (no breastfeeding). This regulation forces all women who would otherwise partially breastfeed into the formula-only category if they cannot produce enough milk. As a result, this regulation could lead to reduction of the current breastfeeding rates, because mothers who would otherwise partially breastfeed in the first month are not given the option to do so. In addition, WIC has the opportunity to provide counseling and support to help women who are partially breastfeeding begin fully breastfeeding their infants. Many women do not fully breastfeed due to lack of support at home, or due to misinformation regarding how to assess if an infant has enough food when they are exclusively breastfeeding. It is incumbent upon WIC to encourage these women, and not to push them to stop breastfeeding altogether.

We recommend that the WIC Food Package include provisions and funding for breastfeeding education and support in all WIC sites, including support for Peer Education programs. We recommend that equitable levels of support be given to breastfeeding and partially-breastfeeding mothers, to encourage breastfeeding as long as possible (at any level).

(5) Proposed : §246.10 (e)(2) (Food package II – Infants 6 through 11 months)

This proposed regulation, includes IOM's recommendation, that food package II be provided to infants from 6 through 11 months of age. The proposed regulation delays the age at which infants become eligible for Food Package II. Currently, infants are made eligible for Food Package II and its complementary foods at four months of age. The proposed rule would make infants eligible for Package II foods at six months of age. We support this change because it is in accordance with WHO & AAP recommendations re: infant feeding.

(6) Proposed : 7 CFR Part 246 (revisions in the WIC food packages)

According to the Food and Nutrition Service, in its notes, there will be a substantial savings associated with the proposed regulations. We recommend that these cost savings be invested in the following three areas:

- Additional cash voucher allowance for fruits & vegetables (consistent w/ IOM recommendation).
- Increased peer counseling to breastfeeding women (exclusive and partial) in the first month of the infant's life, to continue at the same level for both groups after the first month.
- Increased support for dissemination of breast pumps.

We appreciate the opportunity to provide our comments.

Sincerely,

Wilfredo Lopez
General Counsel for Health
NYC Department of Health & Mental Hygiene
125 Worth Street
New York, NY 10013
(212) 788-5025

OSLA-233

From: Rigoberto Vargas [Rigoberto.Vargas@ventura.org]
Sent: Monday, November 06, 2006 8:32 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

This email is to express my strong support for the proposed WIC Food Packages Rule. This rule is long overdue. Low income children will benefit greatly, from the healthier food options.

Rigoberto Vargas, MPH
Program Administrator, Chronic Disease Prevention Ventura County Public Health
2323 Knoll Drive, 3rd Floor
Ventura, CA 93003
(805) 677-5328
(805) 677-5220 fax
e-mail: rigoberto.vargas@ventura.org

OSLA-235



CHRISTINE O. GREGOIRE
Governor

STATE OF WASHINGTON
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November 6, 2006

Patricia N. Daniels, Director
Supplemental Food Programs Division, FNS/USDA
3101 Park Center Drive, Room 528
Alexandria, Virginia 2302

Dear Ms. Daniels:

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

I am writing to express my support for the proposed rule to change the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) food packages.

The directions set in the proposed rule are very positive steps forward to improve the overall health of WIC mothers and children. I wish to specifically support the proposed addition of canned salmon to the WIC food packages. The state of Washington believes that the inclusion and authorization of canned salmon in the proposed WIC food package III and VII for women fully breastfeeding is a very positive enhancement of this food package.

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

The addition of canned salmon would enhance the variety of foods offered to WIC target groups and could positively influence life-long foods dietary choices for both women and children in the program. The Washington State Department of Health notes that consumption of a variety of fish species is beneficial and supports the American Heart Association recommendation to eat two fish meals per week. "Eat Fish, Be Smart, Choose Wisely."

Sincerely,

A handwritten signature in cursive script that reads "Christine O. Gregoire".

Christine O. Gregoire
Governor

OSLA-236

From: Naomi Brauner [naomib@CBRIDGES.ORG]
Sent: Wednesday, October 25, 2006 1:51 PM
To: WICHQ-SFPD
Subject: Comments on WIC Food Package Proposed Rule

October 25, 2006

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

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

Dear Ms. Daniels,

I work for Community Bridges, a large human services nonprofit serving over 30,000 low-income seniors, children, and families in Santa Cruz County. I am pleased to have this opportunity to provide comments on the WIC food package and would like to share these thoughts:

1. Science has conclusively demonstrated that fruits and vegetables are key components for healthy human development. I strongly urge you to include fruits and vegetables in the new good package.
2. I also urge USDA to work with Congress to secure increased federal funding in future years to bring the cash value of these fruit and vegetable vouchers up to the Institute of Medicine's (IOM) recommended levels, and to keep pace with inflation. As you may know, while the IOM recommended \$10/ and \$8/month vouchers, the proposed rule reduced this amount to \$8/ and \$6/month in order to achieve overall cost neutrality.
3. I also strongly support the inclusion of dairy alternatives such as soy-based drinks and tofu.
4. Finally, I support timely implementation of the rule and hope that USDA will complete its analysis of comments on the Proposed Rule quickly and efficiently, and publish a Final Rule by mid-2007 at the very latest.

Again, thank you for the opportunity to provide input, and for all your work to promote healthy development in young children.

Sincerely,
Naomi Brauner
Senior Analyst, Community Bridges

Naomi Brauner, Senior Analyst
Community Bridges
236 Santa Cruz Avenue
Aptos, CA 95003
(831) 688-8840, ext. 207
naomib@cbridges.org
www.communitybridges.org

OSLA-237

From: Jeffrey Brown [Jeffrey.Brown@co.nevada.ca.us]
Sent: Tuesday, October 31, 2006 7:22 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

I have been involved with the WIC program since 1997, overseeing California's Alameda County Public Health Department Program from 1998-2005 and Nevada County's Program since 2005. I strongly support the recommendations of the Institute of Medicine regarding changes to the food package, most particularly:

- provision of cash-value vouchers of \$10 monthly to purchase fruits and vegetables ,
- reduction of the amount of certain foods (milk, cheese, eggs, and juice) in order to better align WIC with current Dietary Guidelines and recommendations from the American Academy of Pediatrics. In particular:
 - reduction of juice and replace it with infant food at 6 months
 - provision of whole grain and soy options
 - inclusion of lower-fat milk and less cheese and eggs

We as a nation are suffering from obesity and type II diabetes epidemics. The WIC Food Package should contribute to the solution, rather than being a source of the problem. Please consider adopting these recommendations as soon as possible.

Jeff Brown
Health and Human Services Agency Director
Nevada County
950 Maidu Ave.
Nevada City, CA 95959
tel: 530-470-2562
e-mail: jeffrey.brown@co.nevada.ca.us

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OSLA-238

From: Burns, Leigh A. [LABurns@SolanoCounty.com]
Sent: Tuesday, October 31, 2006 7:39 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

October 31, 2006

Ms. Patricia N. Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Services
U.S. Department of Agriculture

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

Dear Ms. Daniels,

As a recent graduate and a degreed nutritionist at the Solano County WIC Program in Vacaville, CA, I feel the proposed food package changes are wonderful, albeit long-overdue. The role of a nutritionist is to provide health education and promotion; unfortunately, the existing WIC food packages prevent us from fully translating standard recommendations for optimal nutrition to the diverse population we serve.

It is contradictory to educate mothers about incorporating appropriate juice and milk servings into a balanced diet when the quantity of these commodities we give them each month clearly exceeds established recommendations. It is important to remember that the WIC program was created as an intervention to improve anemia and other nutrient deficiencies, and prevent these problems from happening to low-income families. Our current situation seems to perpetuate these problems, which may be related to the discrepancy between what is recommended and what is actually provided by the program.

Within this bubble of miscommunication, families believe that milk is a healthy balanced meal and/or meal supplement (which, in many low-income families, is offered as a solution to hunger), and drinking juice is equivalent to eating fruit: there really is no upper-limit to the quantity their children consume because they believe milk and juice are inherently good for the health of their child. They are offering these commodities in such large quantities that they add extra unnecessary calories and consequently satiate the child, preventing them from eating a variety of other foods to help meet their daily nutrient needs. Add to this the increased amount of indoor activities (computer, video games) with less physical activity, and as a consequence, we have contributed to a (growing) population of overweight, malnourished children!

A similar situation of misinformation has occurred with regard to formula usage, as mothers still assume, despite contradictory information that supports breastfeeding as the gold standard for infant feeding, that formula is a healthier and easier alimentation to give their infants. Anyone who works at WIC knows that some moms, believing they are doing the best for their baby, plan ahead to feed formula exclusively to their infants, and/or give-up breastfeeding prematurely when it isn't as "easy" as they had expected. Once again, as nutritionists we have the power of accurate information at our hands, which we use to dispel the myths of formula feeding and break down the barriers to breastfeeding. Unfortunately, the misconceptions about infant feeding created by inventive marketing from the formula companies are reinforced by the amount of infant formula we offer, contradicting the good advice we work hard to provide. Opponents to the proposed changes may think that reducing the amount of formula we offer will make it more difficult on our already stressed low-income moms, yet in reality, it is a step in the naturally right direction which will, if all goes as planned, begin to elicit a societal change as a return to breastfeeding as the first and only choice in infant feeding. This will in turn result in lower program costs, for as we all know, breastfeeding is and has always been, FREE.

The recent consideration given to this situation and the proposed changes to the WIC food packet are long overdue. While recognizing that problems such as obesity and nutrient deficiency are multi-factorial, we still have an obligation, as nutritionists, to find a solution to the situation we are facing. We do our part by providing accurate, evidence-based information to our population, and we now ask you to do yours: Provide us with the tools to accurately educate our population of the foods they need to keep themselves and their families healthy by changing the WIC food packages to be consistent with the recommendations of the 2005 Dietary Guidelines for Americans, the American Academy of Pediatrics and the Institute of Medicine. I ask you to please approve the proposed changes in a timely manner, as they are beneficial to everyone involved.

Sincerely,

Leigh Burns
Degreed Nutritionist and Dietetic Intern
Solano County WIC Program

OSLA-239

From: Ann Best [abest@pgst.nsn.us]
Sent: Monday, November 06, 2006 6:30 PM
To: WICHQ-SFPD
Subject: Docket ID Number: 0584-AD77-WIC Food Packages Rule

Dear Ms. Daniels:

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

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

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

- * I support adding fruits and vegetables to the food packages of women, infants and children while reducing the amount of fruit juice provided. Increased consumption of 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 encourage the purchase of U.S. grown fruits and vegetables with WIC checks.

- * I support the quantities of dairy products and eggs offered in the proposed rule. These quantities meet the *2005 Dietary Guidelines for Americans*. We agree that alternative calcium sources such as soy beverage (soy milk) and tofu are necessary additions to the food packages to address milk protein allergy, lactose maldigestion, personal preferences, and cultural diversity of the WIC population.

- * I support the whole grain requirement for cereals and the introduction of whole grain bread and other whole grains such as

corn tortillas and brown rice. Whole grain consumption is associated with 1) reducing the risk of coronary heart disease, type 2 diabetes, digestive system and hormone-related cancers, 2) assisting in maintaining a healthy weight, and 3) increasing the intake of dietary fiber.

* While I commend USDA's efforts in the proposed rule to support the initiation and duration of breastfeeding, we urge that there be /no/ test period for the partially breastfeeding food packages for women and infants. I believe that deletion of the pilot phase would speed the implementation of these packages. For women who declare themselves as breastfeeding moms, we urge that, consistent with the IOM recommendation, States be given the option to establish criteria under which infant formula may be provided in the first month.

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

The Port Gamble Tribe commends USDA for the release of the proposed rule making major changes to the WIC food packages. This proposed rule makes the WIC food packages consistent with the /2005 //Dietary Guidelines for Americans /and is a major step forward to improve the overall nutritional health and well-being of WIC mothers and children.

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.

The Port Gamble S'Klallam Tribe urges publication of a final rule by the spring of 2007 to assure timely implementation of the rule's invaluable changes.

Sincerely,

Ann Best

Community Health Coordinator

OSLA-240

From: Aliya Haq [ahaq@u.washington.edu]
Sent: Monday, November 06, 2006 7:19 PM
To: WICHQ-SFPD
Subject: Docket ID Number: 0584-AD77-WIC Food Packages Rule

November 6, 2006

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

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

Dear Ms. Daniels:

I am writing to express Harborview'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 the nation's women, infants, and children is a priority of our organization. The WIC program at Harborview serves women and children of diverse ethnic groups and the proposed changes will greatly benefit vulnerable mothers and children of all cultural backgrounds.

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

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

a.. We support adding fruits and vegetables to the food packages of women, infants and children while reducing the amount of fruit juice provided. Increased consumption of 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 encourage the purchase of U.S. grown fruits and vegetables with WIC checks.

a.. We support the quantities of dairy products and eggs offered in the proposed rule. These quantities meet the 2005 Dietary Guidelines for Americans. We agree that alternative calcium sources such as soy beverage (soy milk) and tofu are necessary additions to the food packages to address milk protein allergy, lactose maldigestion, personal preferences, and cultural diversity of the WIC population.

a.. We support the whole grain requirement for cereals and the introduction of whole grain bread and other whole grains such as corn tortillas, Teff and brown rice. Considering the increasing numbers of clients of East African origin on WIC, we urge FNS to include Teff and to allow Enjera an East African bread made of Teff, a grain that is a good source of protein and iron much needed by clients of East African origin. Whole grain consumption is associated with 1) reducing the risk of coronary heart disease, type 2 diabetes, digestive system and hormone-related cancers, 2) assisting in maintaining a healthy weight, and 3) increasing the intake of dietary fiber.

a.. While we commend USDA's efforts in the proposed rule to support the initiation and duration of breastfeeding, we urge that there be no test period for the partially breastfeeding food packages for women and infants. We believe that deletion of the pilot phase would speed the implementation of these packages. For women who declare themselves as breastfeeding moms, we urge that, consistent with the IOM recommendation, States be given the option to establish criteria under which infant formula may be provided in the first month.

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

a.. We do not support the proposed requirement that WIC staff receive medical documentation prior to providing food packages that contain soy-based beverages, tofu and additional cheeses. It can not only make the provision of services expensive but can also undermine WIC's efforts to provide appropriate foods to a diverse population. Calcium and Vitamin D fortified soy foods mentioned above could be excellent sources of these nutrients to those who use them for cultural/ personal or medical reasons.

a.. We urge FNS to reconsider the addition of yogurt in quarts as a milk alternative. We recommend that Kosher/ Halal/ yogurt be allowed so we can better serve the cultural needs of different population groups

Harborview Medical Center commends USDA for the release of the proposed rule making major changes to the WIC food packages. This proposed rule makes the WIC food packages consistent with the 2005 Dietary Guidelines for Americans and is a major

step forward to improve the overall nutritional health and well-being of WIC mothers and children.

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 child.

Sincerely,

Aliya S. Haq MS, RD, CD

WIC Nutritionist and Program Coordinator

Harborview Medical Center

Carey Jackson MD

Medical Director of International Medicine Clinic

Harborview Medical Center

Kyle Yasuda MD

Medical Director of Children's Clinic

Harborview Medical Center

Eleanor Graham MD

Attending Physician

Former Medical Director of Children's Clinic

Harborview Medical Center

Aliya S Haq MS, RD, CD
Dietitian/Supervisor/ Program Coordinator
WIC Clinic
Harborview Medical Center
Office Phone: 731-8476

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OSLA-241

From: dena.herman@accessbusinessgroup.com
Sent: Monday, November 06, 2006 8:24 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Importance: High

November 6, 2006
Ms. Patricia N. Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, VA 22302

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

Dear Ms. Daniels,

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

On behalf of the PHFE Foundation Enterprise Solutions WIC Program and the UCLA School of Public Health and the WIC participants we serve, we strongly and enthusiastically support these long-awaited reforms that will provide the families we serve with healthier, more varied food options. We are very pleased to see that the rule reflects recommendations made by the Institute of Medicine (IOM) report, WIC Food Packages: Time for a Change. The IOM urged sweeping changes so that WIC's success as a public health intervention continues, by updating our foods to take into account significant advances in nutrition science and food technology, huge demographic shifts in the WIC population, with much broader ethnic and cultural diversity, and emerging health concerns, particularly obesity and chronic disease.

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 better enable the establishment of successful long-term breastfeeding. For years, the outdated current package has made it difficult for WIC nutrition educators on the front lines to reinforce the messages and skills we share with parents and children. This proposal finally brings the WIC Food Packages in line with current dietary science, and therefore will really help WIC families "walk the talk."

Timely Implementation of Final Rule.

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

2. Fruits and Vegetables.

We strongly support providing 8.2 million WIC mothers and young children with cash-value vouchers to purchase fruits and vegetables. While there is some disappointment over the Department's decision to pay for fewer fruits and vegetables than recommended by the IOM, the pilot programs operated by several California WIC programs to test this option have shown that WIC participants were thrilled with the opportunity for flexible fresh produce choices. Redemption rates were consistently high even at comparatively low voucher values, and had immediate health benefits. We urge USDA to work with Congress to secure increased federal funding in future years to bring the cash value of these fruit and vegetable vouchers up to the IOM-recommended levels, and to keep pace with inflation. However, the proposed voucher levels are an excellent start and should be immediately implemented.

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 highly successful pilot projects recently conducted here.

3. Other Positive Changes Will Improve Dietary Intake.

The Department's aim is to add new foods while preserving cost neutrality. These welcome changes will better align WIC with current dietary and pediatric guidance. In particular:

The proposal to reduce juice and replace it with infant food at 6 months will support AAP recommendations and introduce infants to fruits and vegetables at the appropriate age. We can't wait to implement this proposal!

The provision of soy options will allow WIC to better serve California's extremely diverse young families. 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 and lactose maldigestion, as well as those with cultural preferences for soy foods. 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 choose soy. We also urge that children be able to receive soy products without the proposed requirement of unnecessary and burdensome 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 mostly whole grains. In order to accommodate the medical needs of certain participants, we support the IOM recommendation to allow States to make substitutions for "wheat-free" cereals based on a medical prescription and urge the Department to include such a provision in the final rule.

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

As the Principal Investigator of one of the demonstration studies that showed WIC participants are not only able to make good quality and healthy choices for fruits and vegetables for their families, I know from speaking to WIC participant mothers that these changes would be instrumental in helping them get their families' nutrition off to the best start possible. The economic availability of fresh fruits and vegetables is a high priority for low-income families and the provision suggested by this recommendation would be an excellent start to helping support families do what they know is best for their members' health.

4. Package for Breastfeeding Mothers.

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 enthusiastically support stronger incentives for continued breastfeeding, by providing less formula to partially breastfed infants and offering additional quantities/types of food for breastfeeding mothers. Empirical evidence shows that the inopportune introduction of formula is associated with shorter duration of breastfeeding – effectively denying babies the myriad health benefits derived from exclusive breastfeeding, which is the "Gold Standard" of infant feeding. Moreover, research – and our direct WIC experience – indicates that many women lack confidence in their ability to produce sufficiently for their babies. We have found that particular factors influence the duration of breastfeeding among WIC moms: attendance at a breastfeeding class; knowing others who have breastfed; and support of breastfeeding by significant others.

Our work here has repeatedly shown that skilled, culturally competent support is critical to increasing duration of exclusive breastfeeding in the first month. WIC mothers' concerns about breastfeeding need to be heard and affirmed, and they need to be given information and help so they can feel confident that they can indeed exclusively breastfeed their newborns. Many new mothers who are committed to breastfeeding still have nagging doubts about "running low" on breast milk and having their babies go hungry. They often ask for a little bit of formula – "just in case." Along with staff skills and breastfeeding support services that WIC can provide, the provision of one can of

formula, as insurance to the doubtful mom, is an appropriate and important WIC benefit in the first month, while still allowing the mother to be considered exclusively breastfeeding for the purposes of WIC data collection.

That is why we recommend that WIC providers be given the opportunity to enhance their support of exclusive breastfeeding by being allowed the option to provide the breastfeeding infant, in the first month, with 1) no formula, or 2) one can of powdered formula as recommended in the IOM Report. States would incorporate their option into their existing breastfeeding policies and procedures, which should include comprehensive and hands-on support by skilled, culturally competent WIC breastfeeding staff. Quite a few California WIC programs have been testing and refining this innovative approach to supporting exclusive breastfeeding, and the results have been striking: breastfeeding rates go up.

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 food package changes be implemented concurrently.

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

5. State Flexibility is Critical.

Once implementation is authorized, we strongly urge USDA to allow states more latitude as they implement these sweeping changes. While holding them accountable for balancing food costs, the Department should allow States to choose a plan for rolling out these complex changes using a strategy and timetable that is most efficient for state operations, least disruptive for grocers, and most effective for our local agency work of informing and assisting participants with many changes and more choices. Specifically, allow states to make changes by food category or participant (package) category.

We strongly urge USDA to allow some state flexibility – within strictly defined parameters – regarding the design and categorical tailoring of WIC food packages. This will allow the WIC food packages to be adjusted to keep up with new science, research, demographic and emerging health factors, which may be somewhat state-specific or unique to regions. Examples of rapid changes that WIC might need to address in a flexible manner include the influx of large new immigrant populations, unexpected environmental/industrial damage to parts the U.S. food supply, or unforeseen and rapid changes in the grocery business. As it is doubtful that regulations could be revised often or quickly enough to keep pace with these changes, the USDA should avoid a rigid, cookie-cutter approach and allow States to request approved changes if a demonstrated need arises. This includes the allowance of proposals for cultural food accommodations,

so states can respond to the changing needs and preferences of their ethnically diverse communities in a timely fashion. Likewise, states need to be given the flexibility to work with vendors and partners to promote maximum number and variety of produce items that are locally accessible, culturally appropriate and affordable.

6. Let All WIC Families Shop at Farmers' Markets.

The proposal to include farmers' markets as WIC vendors for WIC fruits and vegetables will be a major win-win for both family farmers and WIC families. However, the rule as written requires overly onerous vendor qualifications for these markets, and needs to be revised to allow farmers' markets to qualify as WIC vendors provided that they comply with already well-established state certification or WIC Farmers' Market Nutrition Program procedures. WIC vendor requirements will need to allow farmers' markets to participate as seasonal vendors and exempt them from stocking the full package.

In conclusion, we look forward to working with USDA and the rest of the WIC community to implement these excellent food package improvements over the next few years. If planned carefully and leveraged by strategic partnerships with grocers, nutrition advocates and WIC families, the implementation of the new WIC food package could drastically improve community food security, address the obesity epidemic, and make healthy food choices easier for millions of low-income households – even outside of WIC. Taken together, this regulatory proposal will ultimately have a positive impact on the health of women, infants and children in California.

Sincerely,

Dena R. Herman, PhD, MPH, RD
Adjunct Assistant Professor
UCLA School of Public Health

Project Director
The WIC Fruit and Vegetable Evaluation Study
PHFE WIC Program

OSLA-242

From: WebMaster@fns.usda.gov
Sent: Monday, November 06, 2006 2:26 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Sonia Martinez
EMAIL: soniadmartinez@gmail.com
CITY: Boulder
STATE: Colorado
ORGANIZATION: Boulder County Public Health
CATEGORY: IndividualHlthProfessional
OtherCategory:
Date: November 06, 2006
Time: 02:25:37 PM

COMMENTS:

Great common sense changes. Reducing caloric intake and promoting healthy foods are great ideas.

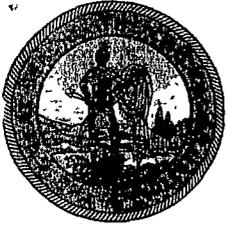
OSLA-244

From: Nina Leek [nleek@hcsn.org]
Sent: Wednesday, October 18, 2006 2:19 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC food package rule

I heartily endorse the suggested changes to the WIC food lists to reflect the current thinking on healthy diet.

It is hard to teach these guidelines knowing that many of our families do not have the means to afford fresh foods

Nina Leek
Program Director,
Blue Hills Healthy Families
Hingham
MA 02043



NOV 06 2006

the
Chickasaw
Nation HEADQUARTERS

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

Bill Anoatubby
Governor

Jefferson Keel
Lieutenant
Governor

November 3, 2006

~~OSLA 13~~
OSLA 245

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

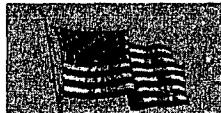
Dear Ms. Daniels:

We commend USDA on this long awaited revision of the Women, Infants and Children Supplemental Nutrition Program (WIC) food package. The Chickasaw Nation enthusiastically supports the proposed rule governing the WIC food package published in the Federal Register on August 7, 2006.

Knowing the intent of the revised regulations is to improve the nutritional health of all WIC participants, we are pleased to see that 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 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.

Understanding that the department's aim is to add new foods while preserving cost neutrality, states should be charged with the responsibility of keeping the food package cost neutral while allowing flexibility and choice. 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." While there is some disappointment over the department's decision to pay for fewer fruits and vegetables than recommended by the IOM report, we believe that WIC clients will be pleased that there will be more choices in the foods offered. In accordance with one of the IOM recommendations, we believe that yogurt would be more acceptable to our participants than tofu as a substitute for milk.



God Bless America!

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. The Chickasaw Nation *does 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 their infants. We recommend that the fully breastfeeding, partially breastfeeding and fully formula feeding women's food packages be implemented concurrently.

The Chickasaw Nation recommends that states be given the option to recognize partial breastfeeding up to the maximum partially breastfeeding food package during the infant's first month. This would afford more consistency of food packages for infants during the entire first year and serve to clarify confusing references to the age of the infant. If partial breastfeeding during the infant's first month is not recognized, the number of women designated as breastfeeding may decrease as more mothers may opt to be listed as fully formula feeding to allow for some formula benefit. States would incorporate their option into their existing breastfeeding policies and procedures.

The Chickasaw Nation applauds USDA's farmers' market promotion efforts and urges FNS to maximize opportunities for small, local growers to participate in all federal nutrition programs. Since these small, local growers are only able to produce seasonally and are limited to fresh fruits and vegetables that they grow, excessive vendor eligibility requirements would be cumbersome and discourage participation.

The Chickasaw Nation recommends that a farmer/farmstand/and/or farmers' market participating in the WIC FMNP be automatically eligible as an authorized farmer/farmstand/and/or farmers' market to accept WIC fruit and vegetable vouchers. This could be labeled as an adjunct eligibility or special dispensation under current rule, alleviating some vendor administrative costs by utilizing existing FMNP structure and personnel for vendor sign-up and compliance. The FMNP's have a history of program integrity and expertise in vendor compliance.

The Chickasaw Nation strongly recommends that the dollar denomination of the fruit and vegetable vouchers and the minimum vendor stocking requirements for fruits and vegetables be determined at the discretion of the WIC state agencies. Years of experience have enabled FMNP agencies to determine the denominations that work best for their areas and seasons. Some have found smaller denominations are cost effective and improve redemption rates, while larger denominations achieve those objectives better in other states.

The Chickasaw Nation recommends that states operating the FMNP be allowed to apply their FMNP food instrument redemption procedures to the redemption of WIC fruit and vegetable vouchers at farmers markets. Federal policy now encourages state agencies to align policies and procedures for more efficient administration of federal programs by states (e.g., Food Stamps, Medicaid, and TANF). Similarly, states should be permitted to align their FMNP and WIC redemption procedures at FMNP redemption sites, such as latitude in requirements for

recipient identification or signatures on vouchers. Alignment of FMNP and WIC fruit and vegetable voucher redemption rules would reduce administrative costs and make the process more understandable and efficient for participating farmers and markets as well as for WIC participants.

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 a wide variety of fruits and vegetables.

The requirement for state agencies to coordinate with other federal, state or local government agencies or with private agencies that operate programs that also provide or reimburse exempt infant formula and WIC-eligible medical food benefits is reasonable. Further comments "to assist WIC participants in quickly obtaining from the other programs any exempt infant formula and WIC-eligible medical foods needs beyond the maximum monthly allowances that may be needed to meet the amount prescribed," is extremely burdensome and unrealistic. Clinic staff does not have the time needed to pursue obtaining benefits for clients from other government agencies nor does WIC staff have the authority to cause other programs to provide benefits "quickly."

The Chickasaw Nation recommends allowing substitutions for supplemental foods *without* additional medical documentation for the following circumstances, so as to avoid undue burden to the WIC family, staff, physician and health system:

- Any authorized supplemental food issued to participants who receive Food Package III
- Any authorized soy-based beverage or tofu issued to children who receive Food Package IV
- Any additional authorized cheese issued to children who receive Food Package IV that exceeds the maximum substitution rate
- Any additional authorized tofu and cheese issued to women who receive Food Packages V and VII that exceeds the maximum substitution rate
- States should retain the ability to offer whole milk to underweight children and pregnant women

The Chickasaw Nation recommends maintaining the current term "cereal (hot or cold)" as the regulatory term for cereal as opposed to adopting the term "breakfast cereal." Nutrition education in the WIC program often encourages the use of cereal as a healthy snack and not just to be used as a "breakfast" food.

Certainly, 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.

As our nation's premier public health nutrition program, WIC is committed to improving the life-long health of our most vulnerable women, infants and children. The long-term benefits of providing participants with fruits and vegetables, lower fat dairy products and whole grains, as well as providing additional incentives for fully breastfeeding women, will result in a healthier generation to come.

We look forward to working closing with USDA to fully implement the proposed rule and urge finalization of the rule in the spring of 2007.

Sincerely,

for  *, Lt. Governor*
Bill Anoatubby, Governor
The Chickasaw Nation

The Eastern Band Of Cherokee Indians



The Honorable Mitchell Hicks, Principal Chief
The Honorable Larry Blythe, Vice-Chief

ISA
 OSLA-
 246

October 27, 2006

02-NP

Dan McCoy
 Chairman
 Birdtown Township

Alan B. Ensley
 Vice-Chairman
 Yellowhill Township

Tribal Council Members

Mary Welch Thompson
 Big Cove Township

Perry M. Shell
 Big Cove Township

Jim Owle
 Birdtown Township

L. Junaluska
 Painttown Township

Tommye Saunooke
 Painttown Township

Angie Rose Kephart
 Snowbird &
 Cherokee Co. Township

Abraham Wachacha
 Snowbird &
 Cherokee Co. Township

Carroll "Pee-Wee" Crowe
 Wolfstown Township

Mike Parker
 Wolfstown Township

David Wolfe
 Yellowhill Township

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

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

Dear Ms. Daniels:

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

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

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

- We support adding fruits and vegetables to the food packages of women, infants and children while reducing the amount of fruit juice provided. Increased consumption of 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 support the quantities of dairy products and eggs offered in the proposed rule. These quantities meet the *2005 Dietary Guidelines for Americans*. We agree that alternative calcium sources such as soy beverage (soy milk) and tofu

are necessary additions to the food packages to address milk protein allergy, lactose maldigestion, personal preferences, and cultural diversity of the WIC population.

- 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. Whole grain consumption is associated with 1). reducing the risk of coronary heart disease, type 2 diabetes, digestive system and hormone-related cancers, 2). assisting in maintaining a healthy weight, and 3). increasing the intake of dietary fiber.
- While we commend USDA's efforts in the proposed rule to support the initiation and duration of breastfeeding, we urge that there be *no* test period for the partially breastfeeding food packages for women and infants. We believe that deletion of the pilot phase would speed the implementation of these packages. For women who declare themselves as breastfeeding moms, we urge that, consistent with the IOM recommendation, States be given the option to establish criteria under which infant formula may be provided in the first month.
- To further support breastfeeding, we urge that the cash-value vouchers for fruits and vegetables for fully breastfeeding women be increased to \$10. We believe that this change would be cost-neutral and a significant incentive for breastfeeding mothers.

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

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.

The EBCI urges publication of a final rule by the spring of 2007 to assure timely implementation of the rule's invaluable changes.

Sincerely,

A handwritten signature in black ink that reads "Michell Hicks". The signature is written in a cursive style with a large initial "M".

Michell Hicks, Principal Chief
Eastern Band of Cherokee Indians