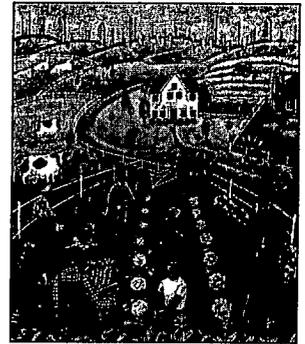


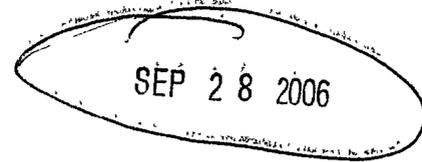
COMMUNITY FOOD SECURITY COALITION

PO Box 209 Venice, CA 90294 Tel 310-822-5410 www.foodsecurity.org



October 2, 2006

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



PI-19

Dear Ms. Daniels:

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

I am writing to offer the support of the CFSC for the revisions in the WIC food packages as proposed by USDA. In light of the severe health and dietary challenges confronting many Americans, especially lower income families and children, it is heartening to see a proposal that will allocate a greater share of public nutrition assistance resources for the healthiest foods available. The introduction of fruits and vegetables, particularly fresh ones, for the WIC food packages will not only encourage healthy eating for the program's mothers and children now, but will also encourage a lifetime of healthier eating for the future.

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

According to USDA, there are now 3,740 U.S. farmers' markets (a number that is continuously growing) serving millions of consumers and providing tens of thousands of farmers with strong market outlets for locally produced food. They operate in every state, nearly every major city, and can be found in almost every county. Farmers' markets have been enormously successful in bringing a wide selection of affordable, extremely fresh, and locally grown produce to places that have been traditionally under served by other forms of affordable, retail food outlets. Among other places, the acceptance of farmers' markets by WIC participants is evident in a Los Angeles research study (E. Jenks, et.al., University of California, Los Angeles) that found that WIC participants redeemed 90.7 percent of their special fruit and vegetable coupons at a farmers' market compared to 87.5 percent at a supermarket even though the location of the supermarket was more convenient.

To be successful in under served, often lower income neighborhoods, farmers' markets have had to learn the specific fresh food preferences of their residents. This has frequently meant that farmers have tailored their crop selection and marketing to the traditional food preferences of a wide variety of racial and ethnic minority groups, and in many cases, newly arrived refugee and immigrants groups. Such efforts have sometimes been aided by programs that provide training and start up needs to new and immigrant farmers who are from the same communities as WIC shoppers. The result is that new farmers are growing and marketing food at farmers' markets that is preferred by these same minority, refugee, and immigrants groups.

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

A complementary aspect of farmers' market growth has been the development and gradual expansion of USDA's WIC Farmers Market Nutrition Program since 1989 (further extended by the development of the Senior Farmers Market Nutrition Program in 2001). The WIC FMNP now operates in 46 states, U.S. territories, and tribal nations and served approximately 2.7 million WIC recipients in 2005, a number which represents a third of all WIC recipients. Surveys conducted over the years by state and tribal agencies, which administer the WIC FMNP consistently find that the modest benefits provided to WIC recipients (usually about \$20 per recipient annually) result in greater consumption of fresh fruits and vegetables. When WIC offices and other participating organizations, including the farmers and farmers' markets themselves, provide nutrition education information and activities to WIC recipients, the value of the FMNP vouchers is enhanced and the long-term consumption of fresh fruits and vegetables is more likely to occur. Just as farmers' market have brought fresh produce to economically distressed communities, the Farmers Market Nutrition Program has brought more socially and economically disadvantaged families to farmers' markets.

By operating WIC FMNPs, many states and tribal organizations have developed a substantial share of the organizational and administrative capacity they will need to operate the proposed WIC produce voucher program. The current procedures for WIC FMNP benefit distribution, redemption, and accountability are very consistent with the proposed revisions pertaining to fruit and vegetable vouchers. FMNP agencies (generally state health and agriculture departments) now issue vouchers that range in value from \$2 to \$5. They have voucher tracking and other accountability procedures as well as procedures to authorize participating farmers and farmers' markets. Additionally, both the development of farmers' markets and the implementation of the WIC FMNP require working partnerships and collaborations between multiple agencies and organizations, both public as well as private. These experiences and practices, developed over the course of 17 years of operating the WIC FMNP, should allow state and tribal WIC agencies to make a relatively smooth transition to the implementation of the proposed fruit and vegetable voucher system.

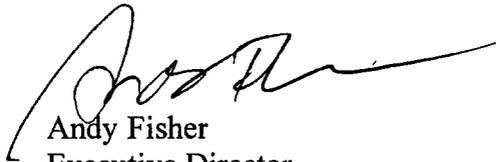
In order for WIC recipients to secure as much nutritional value from the use of the proposed fruit and vegetable WIC vouchers at farmers' markets as possible, we offer the following comments:

- USDA shall do no harm to the WIC Farmers Market Nutrition Program either through reducing current funding levels or establishing rules, systems, or procedures at the federal or state levels that would adversely affect the operation and effectiveness of the WIC FMNP.
- All efforts should be made to promote coordination between the proposed WIC fruit and vegetable voucher program and the existing WIC Farmers Market Nutrition Program. Farmers and farmers' markets that are currently authorized under state WIC FMNP procedures shall be automatically eligible for vendor specification under the new fruit and vegetable voucher program. These WIC FMNP farmer and farmers' market authorization procedures shall also be applied by states in the future vendor specification process.
- When practicable, states should seek to develop systems for the distribution and use of fruit and vegetable vouchers that are compatible with existing WIC FMNP procedures. Nutrition education efforts and state and local promotion of fresh fruit and vegetable vouchers should be compatible with and seek to take advantage of existing WIC FMNP education and promotion practices.
- States should be encouraged to reduce the administrative costs associated with a fruit and vegetable voucher system by developing systems that are compatible with their respective WIC FMNPs
- With respect to vendor specification procedures, farmers' markets shall be allowed to participate as seasonal vendors since most farmers' markets in the country are unable to operate year round. Similarly, farmers' market shall be exempt from the "WIC-only" cost containment requirement and shall not be required to carry a full-range of WIC food package products
- States shall be required to allow farmers' markets as eligible vendors, provided that they comply with farmer and farmers' market authorization procedures.
- Keeping in mind that farmers' markets carry a wide selection of locally produced fresh fruit and vegetables, state agencies shall not limit the range of fruit and vegetable items that may be purchased with fruit and vegetable vouchers.
- Preference shall be given to fresh fruits and vegetables first, then to frozen, and lastly canned.
- There shall be a cost of living adjustment reflected in the value of the vouchers in order to keep pace with inflation.
- The denomination of fruit and vegetable instruments shall be \$2.00 and no change shall be given for vouchers that don't purchase their full denominational value.
- Consistent with Institute of Medicine's recommendation, we support the amount of \$10 per month of fruits and vegetables for mothers and \$8 for children.
- State advisory groups shall be established to develop the most effective and responsive system possible. Where states and/or municipalities have food policy councils, their participation in the advisory process is strongly encouraged.

- In the event that states adopt EBT technology for the use of nutrition benefits by WIC recipients, farmers' markets must also be provided with the most practical EBT systems.
- Just as farmers' markets have been pioneers in making the best fruits and vegetables available to people and places that need them the most, we encourage WIC to make high quality fresh fruits and vegetables available in all outlets that serve WIC recipients. In this regard the national WIC Program should consider implementing pilot projects that test various methods of increasing access to fresh produce, with a variety of retail food outlets including farmers' markets, in areas that are poorly served by such outlets.

On behalf of the CFSC, I thank you for the forward-looking proposal to make fruits and vegetables a regular part of the WIC food package. This advance in the food package will not only prove immeasurably valuable for lower income women and children, but also assist the nation's family farmers for whom farmers' markets are essential to preserving their livelihoods. I feel that farmers' markets can make a substantial contribution to the success of this new initiative, one that promises to provide a healthy tomorrow for all Americans.

Sincerely,



Andy Fisher
Executive Director
Community Food Security Coalition



Consortium for Youth Services, Inc.
 Protecting & Providing
 For The Future
 1500 Pennsylvania Avenue, SE
 Washington, DC 20003-4303
 Phone: 202-548-0558
 Fax: 202-548-0566
 www.cys-dc.org

OCT 26 2006

PI-20

October 25, 2006

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

Re: *Docket ID Number 0584-AD77*

The Consortium for Youth Services, Inc. (CYS) is writing to support USDA's proposed new WIC food packages rule because it will improve the health and nutritional quality of the foods offered, expand cultural food options, and increase choices for the women, infants and children in the WIC program.

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 new WIC food packages will strengthen WIC's positive role in helping mothers and children maintain a healthy weight and allowing them to make healthy food choices.

I commend USDA for updating the WIC food packages to reflect the Dietary Guidelines and current nutritional science by adding fruits, vegetables, whole grain bread, corn tortillas, and the option of soymilk and tofu, and moving to 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:

1. **Increase the fruit and vegetable benefit by \$2 to fully meet the recommendations of the Institute of Medicine for women and children in WIC.**
2. **Allow WIC participants to choose the kinds of fruits and vegetables they want.**
3. **Remove the requirement for children to have a prescription to obtain soy milk from WIC**

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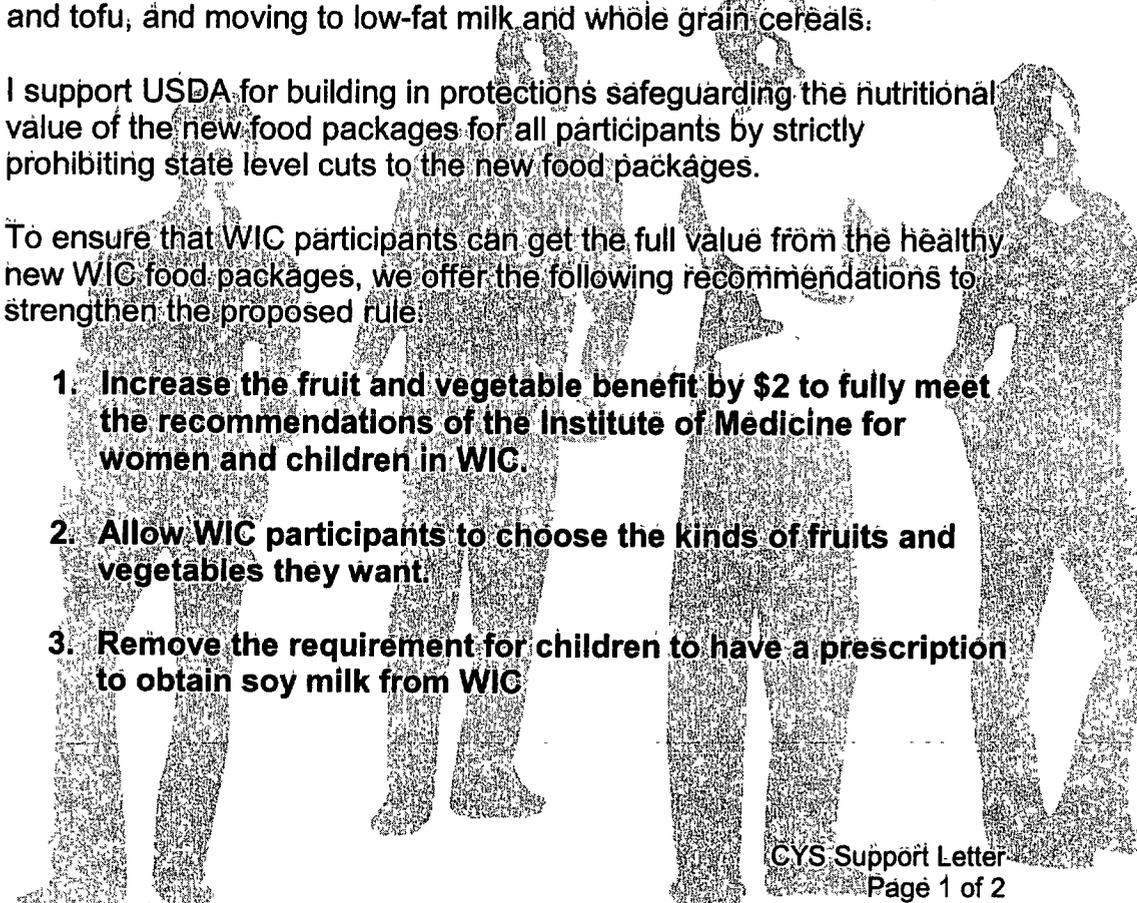
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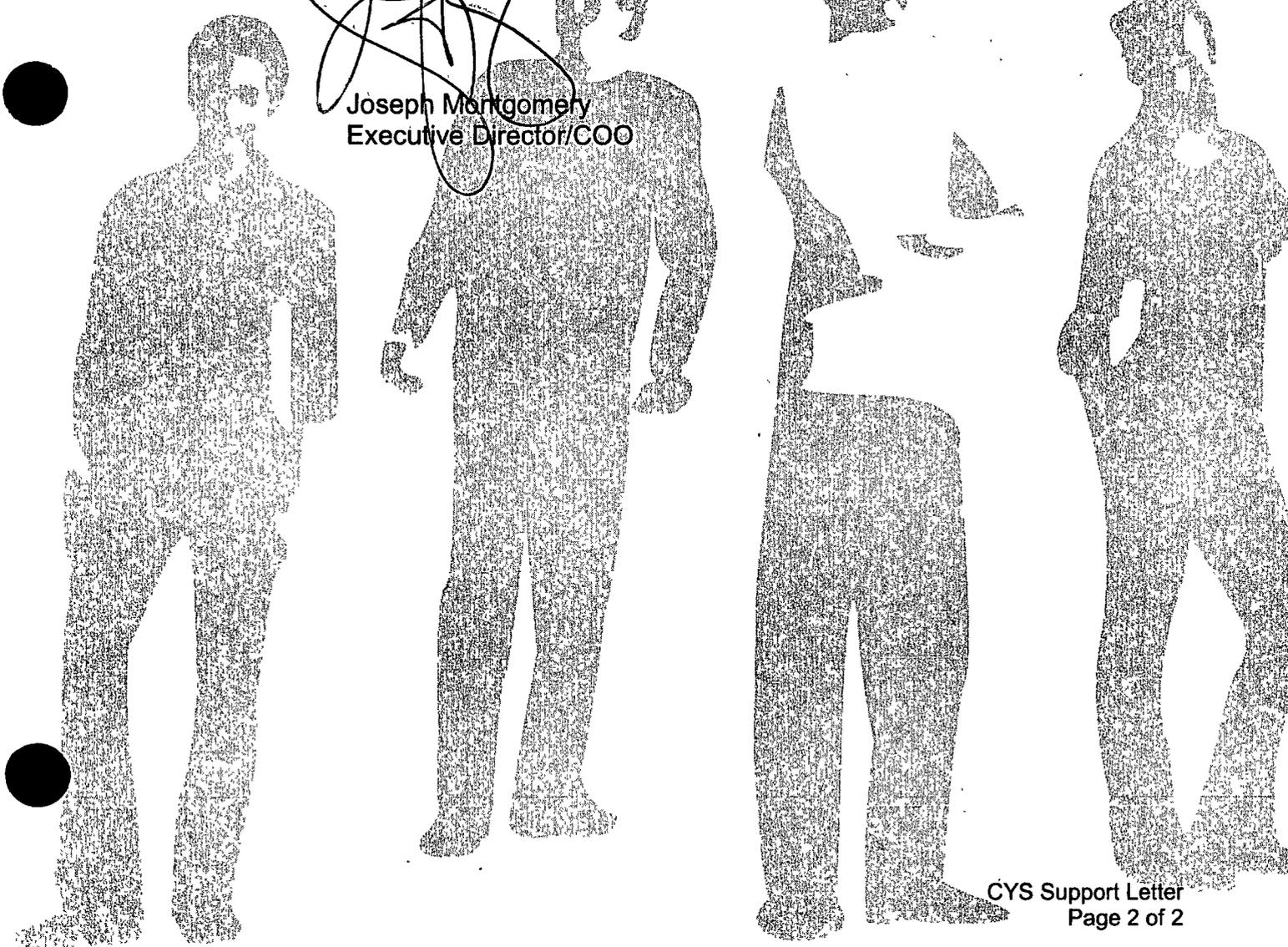
Consortium for Youth Services, Inc.
Protecting & Providing
For The Future...
651 Pennsylvania Avenue, SE
Washington, DC 20003-4303
Phone: 202 548 0553
Fax: 202 548 0556
www.cys-dc.org

4. **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:**
5. **Maximize access to Farmers' Markets and the WIC Farmers' Market Nutrition Program for local seasonal fruits and vegetables.**
6. **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. CYS hopes USDA will act quickly to issue the new food packages.

Sincerely,

Joseph Montgomery
Executive Director/COO



OCT -4 2006



PT-21

October 3, 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:

I am writing to strongly **support the WIC Food Packages Proposed Rule** calling for the addition of fruits and vegetables to the WIC food packages. I commend the Food and Nutrition Service (FNS) for proposing important changes to the WIC food packages that are more consistent with the *2005 Dietary Guidelines for Americans*. As a nutrition professional dedicated to promoting increased fruit and vegetable consumption, I applaud the agency for providing WIC moms and children with fruit and vegetable options through the use of vouchers that can be used to purchase all types of fruits and vegetables.

To maximize choice for WIC moms and kids, I fully support that *all* fruits and vegetables – fresh, canned and frozen (with appropriate limitations on fat, sugar and sodium) – qualify for purchase using the fruit and vegetable voucher. Also, allowing all forms of vegetables and fruits is critical in Alaska where the majority of villages only have canned and frozen available.

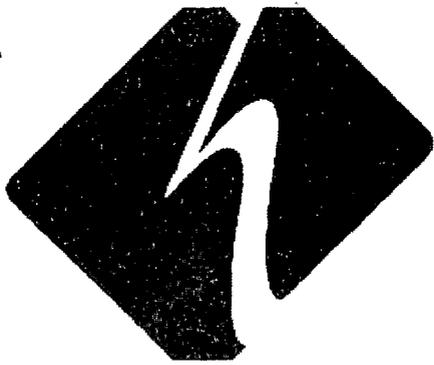
WIC pilot projects conducted in California and New York successfully demonstrated that WIC moms will purchase a wide variety of nutrient dense fruits and vegetables when given a voucher specifically for fruits and vegetables. In addition, these projects demonstrated that WIC Moms highly valued their fruit and vegetable vouchers, resulting in a 90% redemption rate.

As a nutrition professional dedicated to increasing fruit and vegetable consumption, I look forward to an opportunity to work collaboratively with my colleagues in WIC agencies to develop and implement effective nutrition education programs.

I commend FNS for developing this proposed rule to more accurately reflect current dietary recommendations, especially in increasing fruit and vegetable consumption for WIC moms and kids. I urge FNS to issue the final rule by spring of 2007.

Sincerely,

Angela Hochreiter, MPH, RD, LD
Chair
Eat Smart Alaska



OCT - 2 2006

PARTNERS in Ending Hunger

PI-22

October 4, 2006

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

Dear Ms. Daniels:

REF DOCKET ID NUMBER 0584-AD77-WIC FOOD PACKAGE RULE

I am writing to offer the support of Partners in Ending Hunger for the revisions in the WIC food packages as proposed by USDA. Many Americans, especially lower income families and children, will benefit from this proposal that will allocate a greater share of public nutrition assistance resources for the healthiest foods available. The introduction of fruits and vegetables, particularly fresh ones, for the WIC food packages will help shift the calorie dense, nutritional poor diet that is too often the diet of the poor. It's a strong step in breaking the cycle of childhood obesity that rages through our nation. It will encourage healthy eating for the program's mothers and children now, and will also encourage a lifetime of healthier eating for the future.

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

According to USDA, there are now 3,740 U.S. farmers' markets (a number that is continuously growing) serving millions of consumers and providing tens of thousands of farmers with strong market outlets for locally produced food. They operate in every state, nearly every major city, and can be found in almost every county. Farmers' markets have been enormously successful in bringing a wide selection of affordable, extremely fresh, and locally grown produce to places that have been traditionally under served by other forms of affordable, retail food outlets. They also serve as a community meeting spot, where commonalities are appreciated and socio-economic differences minimized -when access is possible by all.

309 Cumberland Avenue - Suite 206
Portland, ME 04101
207.553.2056 207.553.2058 800.786.7486

Nothing makes my day more than a Mom pulling her children through the farmers' market in a wagon, watching their excitement at the variety of produce.

To be successful in under served, often lower income neighborhoods, farmers' markets have had to learn the specific fresh food preferences of their residents. This has frequently meant that farmers have tailored their crop selection and marketing to the traditional food preferences of a wide variety of racial and ethnic minority groups, and in many cases, newly arrived refugee and immigrants groups. In my hometown of Portland, Maine, we have had a huge influx of new refugee and immigrant groups who have been aided by programs that provide training and start up needs to new and immigrant farmers who are from the same communities as WIC shoppers. The result is that new farmers are growing and marketing food at farmers' markets that is preferred by these same minority, refugee, and immigrants groups.

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

A complementary aspect of farmers' market growth in low-income communities has been the development and gradual expansion of USDA's WIC Farmers Market Nutrition Program (FMNP), started in 1989 and further extended by the development of the Senior Farmers Market Nutrition Program in 2001. The WIC FMNP now operates in 46 states, U.S. territories, and tribal nations and served approximately 2.7 million WIC recipients in 2005, a number which represents a third of all WIC recipients. Surveys conducted over the years by state and tribal agencies, which administer the WIC FMNP consistently find that the modest benefits provided to WIC recipients (usually about \$20 per recipient annually) result in greater consumption of fresh fruits and vegetables among recipients. When WIC offices and other participating organizations, including the farmers and farmers' markets themselves, provide nutrition education information and activities to WIC recipients, the value of the FMNP vouchers is enhanced and the long-term consumption of fresh fruits and vegetables is more likely to occur. Just as farmers' markets have brought fresh produce to economically distressed communities, the FMNP has brought more socially and economically disadvantaged families to farmers' markets.

The WIC FMNP has two major benefits that will enhance the effectiveness of providing special produce vouchers that can be redeemed at farmers' markets. First, the FMNP coupons in themselves provide a strong boost to the viability of low-income farmers' markets; many such markets might not operate without such a program. Secondly, by operating WIC FMNPs, states and tribal organizations have developed the organizational and administrative capacity they will need to operate the proposed WIC produce voucher program. The current procedures for WIC FMNP benefit distribution, redemption, and accountability are very consistent with the proposed revisions and over pertaining to fruit and vegetable vouchers. FMNP agencies (generally state health and agriculture departments) now issue vouchers that range in value from \$2 to \$5. They have voucher tracking and other accountability procedures as well as procedures to authorize participating farmers and farmers' markets. Additionally, both the development of farmers' markets and the implementation of the WIC FMNP require working partnerships and collaborations between multiple agencies and organizations, both public as well as private. These experiences and practices, developed over the course of

17 years of operating the WIC FMNP, should allow state and tribal WIC agencies to make a relatively smooth transition to the implementation of the proposed fruit and vegetable voucher system.

In order for WIC recipients to secure as much nutritional value as possible from the use of the proposed fruit and vegetable WIC vouchers at farmers' markets, Partners in Ending Hunger stands in solidarity with the following comments and recommendations of the Community Food Security Coalition, for inclusion in the WIC Food Package regulations:

- USDA SHALL DO NO HARM TO THE WIC FARMERS MARKET NUTRITION PROGRAM EITHER THROUGH REDUCING CURRENT FUNDING LEVELS OR ESTABLISHING RULES, SYSTEMS, OR PROCEDURES AT THE FEDERAL OR STATE LEVELS THAT WOULD ADVERSELY AFFECT THE OPERATION AND EFFECTIVENESS OF THE WIC FMNP.
- COORDINATION SHALL BE REQUIRED BETWEEN THE PROPOSED WIC FRUIT AND VEGETABLE VOUCHER PROGRAM AND ALL EXISTING AND FUTURE FEDERAL-STATE WIC FARMERS MARKET NUTRITION PROGRAMS.
- FARMERS AND FARMERS' MARKETS THAT ARE CURRENTLY AUTHORIZED UNDER STATE WIC FMNP PROCEDURES SHALL BE AUTOMATICALLY ELIGIBLE FOR VENDOR SPECIFICATION UNDER THE NEW FRUIT AND VEGETABLE VOUCHER PROGRAM. THESE WIC FMNP FARMER AND FARMERS' MARKET AUTHORIZATION PROCEDURES SHALL ALSO BE APPLIED BY STATES IN THE FUTURE VENDOR SPECIFICATION PROCESS.
- STATES SHALL BE REQUIRED TO ALLOW FARMERS' MARKETS AS ELIGIBLE VENDORS FOR FRESH FRUITS AND VEGETABLES, WITH THE PROVISION THAT THEY COMPLY WITH FARMERS' AND FARMERS' MARKET AUTHORIZATION PROCEDURES.
- FARMERS AND FARMERS' MARKETS THAT ARE CURRENTLY AUTHORIZED UNDER STATE WIC FMNP PROCEDURES SHALL BE AUTOMATICALLY ELIGIBLE AS WIC VENDORS FOR THE NEW FRUIT AND VEGETABLE VOUCHERS ISSUED BY THE WIC PROGRAM. THE WIC FMNP FARMER AND FARMERS' MARKET AUTHORIZATION PROCEDURES SHALL ALSO BE APPLIED BY STATES AS THE VENDOR REQUIREMENTS FOR FARMERS OR FARMERS' MARKETS FOR THIS PROGRAM.
- WITH RESPECT TO VENDOR REQUIREMENTS, FARMERS' MARKETS SHALL BE ALLOWED TO PARTICIPATE AS SEASONAL VENDORS SINCE MOST FARMERS' MARKETS IN THE COUNTRY ARE UNABLE TO OPERATE YEAR ROUND. SIMILARLY, FARMERS' MARKETS SHALL BE EXEMPT FROM THE "WIC-ONLY" COST CONTAINMENT REQUIREMENT AND SHALL NOT BE REQUIRED TO CARRY A FULL-RANGE OF WIC FOOD PACKAGE PRODUCTS.
- WHEN PRACTICABLE, STATES SHOULD SEEK TO DEVELOP SYSTEMS FOR THE DISTRIBUTION AND USE OF FRUIT AND VEGETABLE VOUCHERS THAT ARE COMPATIBLE WITH EXISTING WIC FMNP PROCEDURES. NUTRITION EDUCATION EFFORTS AND STATE AND LOCAL PROMOTION OF FRESH FRUIT AND VEGETABLE VOUCHERS SHOULD BE COMPATIBLE WITH AND SEEK TO TAKE ADVANTAGE OF EXISTING WIC FMNP EDUCATION AND PROMOTION PRACTICES. STATES SHOULD BE ENCOURAGED TO REDUCE THE ADMINISTRATIVE COSTS ASSOCIATED WITH A FRUIT AND VEGETABLE VOUCHER SYSTEM BY DEVELOPING SYSTEMS THAT ARE COMPATIBLE WITH THEIR RESPECTIVE WIC FMNPs
- IN THE EVENT THAT STATES ADOPT EBT TECHNOLOGY FOR THE USE OF NUTRITION BENEFITS BY WIC RECIPIENTS, FARMERS' MARKETS MUST ALSO BE PROVIDED WITH THE MOST PRACTICAL EBT SYSTEMS FOR THE FRUIT AND VEGETABLE REDEMPTION PROCESS.

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

- STATE AGENCIES SHALL NOT HAVE THE AUTHORITY TO LIMIT THE RANGE OF FRUIT AND VEGETABLE ITEMS THAT MAY BE PURCHASED WITH FRUIT AND VEGETABLE VOUCHERS, THOUGH PREFERENCE SHALL BE GIVEN TO FRESH FRUITS AND VEGETABLES FIRST, THEN TO FROZEN, AND LASTLY CANNED.
- THERE SHALL BE A COST OF LIVING ADJUSTMENT REFLECTED IN THE VALUE OF THE VOUCHERS IN ORDER TO KEEP PACE WITH INFLATION.
- THE DENOMINATION OF FRUIT AND VEGETABLE INSTRUMENTS SHALL BE IN SMALL AMOUNTS SUCH AS \$1.00 AND \$2.00 DENOMINATIONS.

- NO CHANGE SHALL BE GIVEN FOR VOUCHERS THAT DON'T PURCHASE THEIR FULL DENOMINATIONAL VALUE.
- CONSISTENT WITH INSTITUTE OF MEDICINE'S RECOMMENDATION, WE SUPPORT THE AMOUNT OF \$10 PER MONTH OF FRUITS AND VEGETABLES FOR MOTHERS AND \$8 FOR CHILDREN.
- STATE ADVISORY GROUPS SHALL BE ESTABLISHED TO DEVELOP THE MOST EFFECTIVE AND RESPONSIVE SYSTEM POSSIBLE FOR OPERATING THE FRUIT AND VEGETABLE VOUCHER PROGRAM. WHERE STATES AND/OR MUNICIPALITIES HAVE FOOD POLICY COUNCILS, THEIR PARTICIPATION IN THE ADVISORY PROCESS IS STRONGLY ENCOURAGED.

Just as farmers' markets have been pioneers in making the best fruits and vegetables available to people and places that need them the most, Partners recommends that WIC encourage the availability of high quality fresh fruits and vegetables in all outlets that serve WIC recipients. In this regard the national WIC Program should consider implementing pilot projects that test various methods of increasing access to fresh produce in a variety of retail food outlets, including farmers' markets, in areas that are poorly served by such outlets.

Partners in Ending Hunger thanks you for the forward-looking proposal to make fruits and vegetables a regular part of the WIC food package. This advance in the food package will not only prove immeasurably valuable for lower income women and children, but also assist the nation's family farmers, especially our Maine farmers, for whom farmers' markets are essential to preserving their livelihoods. Farmers' markets can make a substantial contribution to the success of this new initiative, one that promises to provide a healthy tomorrow for all Americans. It's a big step in our work to end hunger in Maine, in all of America.

Sincerely,



Dianne Holcomb
Executive Director
Partners in Ending Hunger



015 - 5 - 1

Member of America's Second Harvest
100 Woodland Ave, Bloomfield, CT 06002-1342
Phone (860) 286-9999 Fax (860) 286-7860
On the web: <http://www.foodshare.org>

PI-23

October 5, 2006

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

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

Dear Ms. Daniels:

I write in support of the proposed regulations regarding WIC food packages, especially the provision that allows farmers' markets as eligible WIC vendors. Providing access to fresh fruits and vegetables should provide significant health benefits to WIC families. The provision allowing farmer's markets to be eligible WIC vendors is particularly important to allow WIC families access to the best, freshest produce.

Connecticut has had a successful WIC Farmers' Market Nutrition Program for a number of years, which has demonstrated the value of these efforts. I urge that the funding for the FMNP not be reduced as a part of these changes or adversely affected in its operation or effectiveness.

There should be no limit placed on the type of fresh fruits and vegetables that may be purchased with the new fruit and vegetable coupons, so that families can best choose what meets their own needs, familiarity, and tastes. Farmers' markets should be allowed to participate as seasonal vendors, exempt from the "WIC-only" cost containment requirements, and not be required to carry a full-range of WIC food package products.

Thank you for your attention to these important changes that will significantly improve the WIC program for low-income families.

Sincerely,

Gloria J. McAdam
President and CEO





NATIONAL COUNCIL OF THE UNITED STATES
SOCIETY OF ST. VINCENT DE PAUL, INC.

PJ-29

SEP 27 2006

September 22, 2006

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

Dear Ms. Daniels:

As President of the Society of St. Vincent de Paul, with 112,000 members, I would like to comment on the proposed rule revision to the Women Infants and Children (WIC) program which would allow fruits, vegetables and whole grains to be added to the program. Members of the Society visit those who are poor in their homes and provide emergency assistance. They see needs first hand.

Better nutrition is needed in low-income areas, and it is important that women and their children in the WIC Program have choices in addition to the juice, eggs, cheese and milk currently in the program. US dietary guidelines (Dietary Guidelines for Americans 2005 <http://www.healthierus.gov/dietaryguidelines/>) recommend a variety of nutrient dense foods. Recommendations include the consumption of "more dark green vegetables, orange vegetables, legumes, fruits, whole grains, and low-fat milk and milk products; and less refined grains, total fats (especially cholesterol, and saturated and trans fats), added sugars, and calories." Please provide women and their children with the ability to meet these requirements. Healthy mothers and healthy children need to have access to fresh fruits, vegetables and whole grains.

Yours in St. Vincent and Blessed Frédéric,

Joseph Flannigan
President
National Council of the United States

JDF/sab



PI-25

Sent: Thursday, October 05, 2006 1:40 AM
To: WICHQ-SFPD
Subject: Docket ID #0584-AD77 WIC Food Package Rules

To the makers of the WIC Food Rules,

I am pleased to see changes being made to the WIC nutrition program. These proposed changes will benefit the tax payers as well as the WICK program participants. I routinely see formula for sale on Craig's List.Com, which seems to be blatant sale for profit of government supplied formula from the WIC program. Obviously, the WIC system is over supplying formula and is lacking in offering education and true system-wide support (IE: educated, well trained employees) for the breastfeeding mother. I'm so happy to see that the proposed changes are addressing some real concerns facing the WIC program.

Sincerely,

Beyond Birth, Nursing Mother's Council
Portland Oregon



Oregon

PI-26

Department of Human Services
Health Services

AUG 31 2006

Portland, OR 97232-2162

August 31, 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:

Oregon's 5 A Day Steering Committee strongly **supports the WIC Food Packages Proposed Rule** calling for the addition of fruits and vegetables to the WIC food packages. I commend the Food and Nutrition Service (FNS) for proposing important changes to the WIC food packages that are more consistent with current the *2005 Dietary Guidelines for Americans*. As the Fruit and Vegetable Nutrition Coordinator for Oregon, I am writing on behalf of the Oregon 5 A Day Steering Committee. The Steering Committee members are dedicated to promoting increased fruit and vegetable consumption. I applaud the U.S. Department of Agriculture for providing WIC moms and children with fruit and vegetable options through the use of vouchers that can be used to purchase all types of fruits and vegetables.

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

Follow Institute of Medicine's Recommendations

Given that many WIC participants – and most Americans consume less than one half of the fruits and vegetables recommended in the *2005 Dietary Guidelines for Americans*, WIC can play an important role in helping Americans meet these guidelines. Adding more fruits and vegetables to the WIC food packages is especially critical to encouraging infants (through the addition of infant food fruits and vegetables), young children, and moms to establish positive dietary patterns conducive to good health. A diet rich in fruits and vegetables decreases risk of high blood pressure, heart disease and certain cancers.



August 31, 2006

Patricia Daniels

Page 2

Because of the importance of increasing fruit and vegetable consumption, I strongly encourage FNS to follow the recommendations of the Institute of Medicine's (IOM) Report: "WIC Food Packages: Time for a Change" and provide WIC moms and children with a \$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 – an important objective of the IOM.

Allow All Fruits and Vegetables

To maximize choice for WIC moms and kids, I fully support that *all* fruits and vegetables – fresh, canned and frozen (with appropriate limitations on fat, sugar and sodium) – to qualify for purchase using the fruit and vegetable voucher.

WIC pilot projects conducted in California and New York successfully demonstrated that WIC moms will purchase a wide variety of nutrient dense fruits and vegetables when given a voucher specifically for fruits and vegetables. In addition, these projects demonstrated that WIC Moms highly valued their fruit and vegetable vouchers, resulting in a 90% redemption rate.

It is also critically important that state and local WIC agencies allow WIC moms and kids to have maximum choice in selecting fruits and vegetables to purchase using the vouchers. I do not recommend that WIC state agencies be allowed to restrict or limit choice of which fruits and vegetables are eligible for purchase with the cash-value vouchers. In addition, I suggest that WIC state agencies encourage vendors to provide a wide selection of nutritious fruits and vegetables for WIC moms and kids.

Enhance Nutrition Education

The importance of nutrition education is stressed throughout the proposed regulations. I encourage FNS to urge state and local WIC agencies to emphasize increased consumption of fruits and vegetables in their nutrition education activities. Specifically, education should be consistent with the new Fruits & Veggies—More Matters™ campaign.

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 look for foods that carry the Fruits & Veggies—

August 31, 2006

Patricia Daniels

Page 3

More Matters™ brand in helping them select a variety of healthy fruits and vegetables.

I commend FNS for developing this proposed rule to more accurately reflect current dietary recommendations, especially in increasing fruit and vegetable consumption for WIC moms and kids. I urge FNS to issue the final rule by spring of 2007.

Sincerely,

Oregon Health Division



September 20, 2006

PI-27
SEP 23 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:

I am writing to support the WIC Food Packages Proposed Rule calling for the addition of fruits and vegetables to the WIC food packages. I commend the Food and Nutrition Service (FNS) for proposing important changes to the WIC food packages that are more consistent with current dietary guidance such as the *2005 Dietary Guidelines for Americans*. As the 5 A Day Coordinator for Missouri dedicated to promoting increased fruit and vegetable consumption, I applaud the agency for providing WIC moms and children with fruit and vegetable options through the use of checks that can be used to purchase all types of fruits and vegetables.

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

Follow Institute of Medicine's Recommendations

Given that many WIC participants – and most Americans consume less than one half of the fruits and vegetables recommended in the *2005 Dietary Guidelines for Americans*, WIC can play an important role in helping Americans meet these guidelines. Adding more fruits and vegetables to the WIC food packages is especially critical to encouraging infants (through the addition of infant food fruits and vegetables), young children, and moms to establish positive dietary patterns conducive to good health. A diet rich in fruits and vegetables decreases the risk of high blood pressure, heart disease and certain cancers.

Because of the importance of increasing fruit and vegetable consumption, I strongly encourage FNS to follow the recommendations of the Institute of Medicine's (IOM) Report: "WIC Food Packages: Time for a Change" and provide WIC moms and children with a \$10/month and \$8/month, respectively, cash-value checks for fruits and vegetables. These amounts will help moms and kids eat at least one additional serving of fruit or vegetable each day – an important objective of the IOM.

Allow All Fruits and Vegetables

To maximize choice for WIC moms and kids, I fully support that *all* fruits and vegetables – fresh, canned and frozen (with appropriate limitations on fat, sugar and sodium) – qualify for purchase using the fruit and vegetable checks.

Healthy Missourians for Life.

The Missouri Department of Health and Senior Services will be the leader in promoting, protecting and partnering for Health.

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER: Services provided on a nondiscriminatory basis.

Patricia Daniels, page 2
September 20, 2006

WIC pilot projects conducted in California and New York successfully demonstrated that WIC moms would purchase a wide variety of nutrient dense fruits and vegetables when given a check specifically for fruits and vegetables. In addition, these projects demonstrated that WIC moms highly valued their fruit and vegetable checks, resulting in a 90% redemption rate.

It is also critically important that state and local WIC agencies allow WIC moms and kids to have maximum choice in selecting fruits and vegetables to purchase using the checks. I do not recommend that WIC state agencies be allowed to restrict or limit choice of which fruits and vegetables are eligible for purchase with the cash-value checks. In addition, I suggest that WIC state agencies encourage vendors to provide a wide selection of nutritious fruits and vegetables for WIC moms and kids.

Enhance Nutrition Education

The importance of nutrition education is stressed throughout the proposed rule. I encourage FNS to urge state and local WIC agencies to emphasize increased consumption of fruits and vegetables in their nutrition education activities. Specifically, education should include information on:

- Why it is important to eat a variety of fruits and vegetables every day
- How to select fruits and vegetables that are nutrient dense, best seasonal buys, most economical, and convenient
- Preparation tips and recipes
- Food safety tips

As a nutrition professional dedicated to increasing fruit and vegetable consumption, I look forward to an opportunity to work collaboratively with my colleagues in WIC agencies to develop and implement effective nutrition education programs.

The Produce for Better Health Foundation and its national partners recently created the new brand, Fruits & Veggies—More Matters™. The Centers for Disease Control and Prevention has worked with 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.

I commend FNS for developing this proposed rule to more accurately reflect current dietary recommendations, especially in increasing fruit and vegetable consumption for WIC moms and kids. I urge FNS to issue the final rule by spring of 2007.

Sincerely,

OCT 13 2006

PI-28

October 10, 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:

I am writing to strongly support the **WIC Food Packages Proposed Rule** calling for the addition of fruits and vegetables to the WIC food packages. I commend the Food and Nutrition Service (FNS) for proposing important changes to the WIC food packages that are more consistent with current dietary guidance such as the *2005 Dietary Guidelines for Americans*. As a Fruit and Vegetable Nutrition Coordinator for Minnesota dedicated to promoting increased fruit and vegetable consumption, I applaud the agency for providing WIC moms and children with fruit and vegetable options through the use of vouchers that can be used to purchase all types of fruits and vegetables.

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

Follow Institute of Medicine's Recommendations

Given that many WIC participants – and most Americans consume less than one half of the fruits and vegetables recommended in the *2005 Dietary Guidelines for Americans*, WIC can play an important role in helping Americans meet these guidelines. Adding more fruits and vegetables to the WIC food packages is especially critical to encouraging infants (through the addition of infant food fruits and vegetables), young children, and moms to establish positive dietary patterns conducive to good health. A diet rich in fruits and vegetables decreases the risk of high blood pressure, heart disease and certain cancers.

Because of the importance of increasing fruit and vegetable consumption, I strongly encourage FNS to follow the recommendations of the Institute of Medicine's (IOM) Report: "WIC Food Packages: Time for a Change" and provide WIC moms and children with a \$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 – an important objective of the IOM.

Allow All Fruits and Vegetables

To maximize choice for WIC moms and kids, I fully support that *all* fruits and vegetables – fresh, canned and frozen (with appropriate 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 moms will purchase a wide variety of nutrient dense fruits and vegetables when given a voucher specifically for fruits and vegetables.



- American Cancer Society, MN
- American Heart Association, GMA
- Amport Foods
- BlueCross/BlueShield of MN
- Byerly's
- C.H. Robinson
- Chilean Fresh Fruit Assoc.
- DOER, Employer Insurance Division
- Fairview Public Relations
- Florida Dept. of Citrus
- Food Communication Services
- General Mills
- H. Brooks & Company
- HealthPartners
- HealthEast, Healthier Communities
- Hennepin County Community Health
- Hennepin Health Works
- Hunger Solutions
- y's Foods, Inc.
- y Greens Council
- Land's Food Holding Produce Office
- March of Dimes, MN Chapter
- Medica Health Plan
- Midwest Dairy Council
- Minneapolis Heart Institute
- Minneapolis Urban League
- MN Beef Council
- MN Board of Aging
- MN Department of Agriculture
- MN Dept. of Education
- MN Department of Health
- MN Grocers Association
- MN Restaurant, Hotel & Resort Assoc.
- Nash Finch Company
- North Country Produce
- Organic Alliance
- Powers & Associates
- Rykoff-Sexton
- Schwan's Foodservice
- Second Harvest Heartland
- SimonDelivers
- Spring Lake Park Schools
- St. Catherine's College
- St. Paul/Ramsey County Public Health
- StayWell
- SuperValu/Cub Foods
- University of Minnesota Extension
- MN Food and Nutrition Network
- Washington Apple Commission
- ington Co. Public Health
- 3 Foods



OCT 17 2006

October 17, 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

PF-31

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

Dear Ms. Daniels:

Thank you for this opportunity to express our support for USDA's proposed reforms to the WIC food package and to suggest further improvements to the proposed rule. Over 86 percent of households with infants and young children who access food from Food Bank of Alaska's partner agency network also receive WIC benefits. Accordingly, we strongly support any changes that will enhance the healthy food choices available to these vulnerable households. In particular, we would like to offer the following comments:

- 1. Fruits and vegetables:** We strongly support the inclusion of vouchers for fruits and vegetables, as recommended by the Institute of Medicine's (IOM) Report: "WIC Food Packages: Time for a Change." We are dismayed, however, that the proposed rule reduces the IOM-recommended allotments from \$10 and \$8 per month to \$8 and \$6 per month, especially given the high cost of produce in Alaska. We urge USDA to work with Congress to secure increased federal funding to match the IOM's recommendation and index the allotment to inflation. Moreover, we encourage USDA to allow WIC clients to select the fruits and vegetables that provide the best nutritional value, best bargain and best choice for themselves and their children. We oppose giving states authority to limit the varieties of fruits and vegetables eligible for purchase, and we commend USDA's inclusion of farmer's markets as seasonal vendors in the WIC program.
- 2. Soy options:** Our experience in food banking has shown that clients benefit most from food assistance when they are able to choose foods that meet their personal, cultural, and health needs. Accordingly, we support the option to substitute soy-



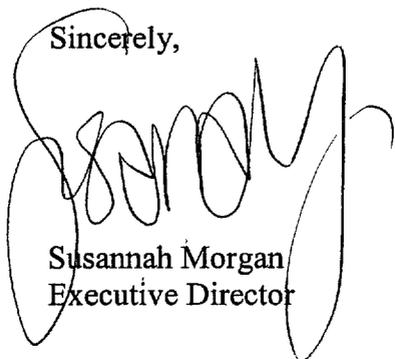


based products such as soy milk and tofu for dairy. Our clients include large numbers of Alaska Natives and Asian-Americans, who are disproportionately affected by milk allergies and lactose intolerance. The proposed substitutions give these clients another option to meet their nutritional needs. We urge USDA to remove the proposed requirement for a medical prescription for children to get soy milk or tofu, which will only create an unnecessary barrier to WIC clients accessing food that meets their cultural and nutritional needs.

- 3. Whole grains:** The proposed rule lumps the size of a loaf of bread and grains together as 1 pound (16 ounces). This works for grains that are sold by the pound, such as rice, but whole grain loaves are heavy, usually weighing more than 1 pound. According to data from Interstate Bakeries, 81 percent of whole wheat/whole grain loaves are sold in a 20-ounce or heavier loaf. This suggests that in many stores a client may be unable to buy a loaf of bread with a 1 pound bread voucher. We recommend that USDA revise the whole grain bread voucher to be more consistent with the size of loaf typically sold in stores. We also recommend that the proposed cereal grain standards be revised to include whole grain corn- and rice-based cereals, in line with USDA's Healthier U.S. Schools guidelines.

In summary, we enthusiastically support the new WIC food package and urge USDA to make changes necessary to increase the number of nutritious and culturally appropriate foods available to clients. We are deeply appreciative of WIC's role in reducing hunger and promoting good nutrition among Alaska's women, infants and children. We hope that USDA will move quickly to implement the final rule, and we thank you for this opportunity to weigh in on these long-overdue changes.

Sincerely,



Susannah Morgan
Executive Director



Shawn Powers
Advocacy Program Manager