

LA-1258

From: Carol Kronberg [CKRONBER@sonoma-county.org]
Sent: Monday, November 06, 2006 7:56 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

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.

As the manager of the Sonoma County DHS WIC Program I strongly and enthusiastically support these long-awaited changes to the WIC food packages that will provide WIC families with healthier and more varied food options. These changes take into account the significant advances in nutrition science and food technology; demographic shifts and increased diversity in the WIC population, and health concerns, particularly around obesity prevention.

For over 30 years as a WIC Nutritionist, I have found the current package often makes it difficult to reinforce the health and nutrition messages WIC shares with parents. The proposed revisions, based on the IOM recommendations, are grounded in sound science, aligned with the 2005 Dietary Guidelines for Americans, and support the current infant feeding practice guidelines of the American Academy of Pediatrics. This proposal will finally make the WIC Food Packages consistent with current dietary science. While in general I support the proposed rule, there are particular areas I wish to comment on.

1. Time is of the essence. WIC children age out of the WIC program after a few short years. Any delay in implementation of these proposals means more children will not benefit from the changes. Local WIC agencies are eager to get started. I urge USDA to conduct its analysis of the comments on the Proposed Rule quickly and efficiently, publish an Interim Final Rule in early 2007 and urge states to fully implement the changes within two years. I also recommend that USDA allow states to implement by food category rather than by WIC participant category so that more families will benefit from incremental changes over the implementation period. USDA should allow "hybrid" old/new food packages during the implementation period. WIC families should not have to wait any longer for better WIC foods!

2. I strongly support providing WIC mothers and young children with cash-value vouchers to purchase fruits and vegetables. However, I was disappointed to see the dollar amounts reduced from the IOM recommendations. I urge USDA to work with Congress to secure increased federal funding in future years to bring the cash value of these fruit and vegetable vouchers up to the IOM-recommended levels, and to keep pace with inflation.

I think that the recommendation to eliminate white potatoes would be administratively difficult. The pilots with fruit and vegetable cash vouchers done in California showed that WIC participants made a wide variety of choices. There is no need to waste administrative funds training and policing the exclusion of a single vegetable.

3. I strongly support the proposal to eliminate juice for infants and replace it with infant food fruits and vegetables at age 6 months. This supports AAP recommendations and introduces infants to fruits and vegetables at the appropriate age. I also support the reduction of juice for children and women. I would actually prefer to see juice eliminated from all the food packages making more funds available for whole fruits and vegetables.

4. I support the provision of soy options to dairy products. The proposed alternatives of calcium-set tofu and calcium- and vitamin D-rich soy beverages will prove to be particularly beneficial to those WIC participants who suffer the medical consequences of milk protein allergy and lactose intolerance, as well as those with cultural preferences for soy foods. However, I urge that children be able to receive soy products without the proposed requirement of unnecessary and burdensome medical documentation. These are not medical foods, just appropriate alternatives to milk and other dairy products.

5. I strongly support the proposed addition of whole grain bread and other grains for all children and pregnant and breastfeeding women. This is consistent with the 2005 Dietary Guidelines for Americans which recommend that refined grains be replaced with mostly whole grains.

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

7. I do not support the reduction in the number of eggs. Eggs are a low cost, well liked, and easy to prepare source of high quality protein appropriate in the diets of pregnant and breastfeeding women and young children. Eggs are usually most economically purchased in cartons of 18, and I recommend USDA consider increasing the quantity of eggs in the final rule to at least 1 ½ dozen per month.

8. The proposed rule aims to support breastfeeding for the first six months and continued breastfeeding, with appropriate complementary foods, until the infant's first birthday. I support stronger incentives for continued breastfeeding, by providing less formula to partially breastfed infants and offering additional quantities/types of food for exclusively breastfeeding mothers. Early introduction of formula is associated with shorter duration of breastfeeding – effectively denying babies the health benefits derived from exclusive breastfeeding,

However, many women need a lot of support to get through the first few weeks with a newborn without resorting to formula. For this to work, I urge increased funding for WIC breastfeeding peer counseling programs. Peer counselors are often effective at getting women to return to exclusive breastfeeding even after they have started some formula. The WIC definition of exclusive breastfeeding should be based on what the mother is currently providing to her infant.

9. I do not support the recommendation to delay the changes while pilot-testing the food package for the partially breastfeeding woman. They should not have to wait for better food and with a delay in implementation of this package, many women will simply choose to formula feed. The fully breastfeeding, partially breastfeeding and fully formula-feeding food package changes should be implemented concurrently.

10. To further enhance the food package for fully breastfeeding women, I urge USDA to raise the cash-value vouchers for fruits and vegetables to the original IOM-recommended amount of \$10 per month.

6. 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 for fruits and vegetables only, 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.

I appreciate the opportunity to comment on the proposed rule and can't wait to see these changes implemented for the families we serve. The new WIC food package will 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 and the rest of the country.

Sincerely,

Carol Kronberg
Health Program Manager
WIC Program
County of Sonoma DHS

2400 County Center Drive, Ste. A
Santa Rosa, CA 95403
(707) 565-6595
(707) 565-6524 (fax)

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LA-1259

From: WebMaster@fns.usda.gov
Sent: Monday, November 06, 2006 7:54 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Robin Hannon
EMAIL: robin@scchd.org
CITY: Belleville
STATE: IL
ORGANIZATION: St. Clair County Health Department
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 06, 2006
Time: 07:54:26 PM

COMMENTS:

I wish to submit my support for the WIC Food Package Proposal. The changes are long over due to meet cultural and nutritional changes in the WIC population and further breastfeeding. Thanks for this opportunity to comment!

LA-1261

From: no-reply@erulemaking.net
Sent: Thursday, October 26, 2006 10:43 AM
To: CNDPROPOSAL
Subject: Public Submission

Please Do Not Reply This Email.

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

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

First Name: Kathleen
Last Name: Powell
Mailing Address: 200 Wes Front Street
City: Bloomington
Country: United States
State or Province: IL
Postal Code: 61701
Organization Name: McLean County Health Department

Comment Info: =====

General Comment:I am a nutritionist in a WIC office. I feel strongly that the foods provided by the WIC program should be revised. I agree with the changes proposed and so do all the clients that I have talked to about the proposed changes. It is very difficult to educate people on eating more fruits and vegetables and whole grains when we do not help them get them. The clients on WIC are from low income families and can not afford to buy many fruits and vegetables and whole grains, so therefore us telling them to increase their intake in these foods is not very realistic. Adding jarred baby foods for the infants would be greatly welcomed too. The moms new to WIC always ask when the baby will get jarred foods in the coupons. Thank you for you time and I (along with the clients I see) really hope to see the changes to the food packages soon.

Kathleen Powell, MSPH, CLC
kathleen.powell@mcleancountyil.gov

LA-1262

From: WebMaster@fns.usda.gov
Sent: Thursday, October 26, 2006 3:59 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Laura Wood
EMAIL: lwood@crawfordcohd.org
CITY: Pittsburg
STATE: Kansas
ORGANIZATION: Crawford County Health Department
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 26, 2006
Time: 03:58:45 PM

COMMENTS:

I agree with the proposed rule. I feel it gives our participants more healthy and balanced options.

LA-1264

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 12:09 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Edelwina Gereaux
EMAIL: winnie.gereaux@acgov.org
CITY: oakland
STATE: California
ORGANIZATION: Alameda WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 27, 2006
Time: 12:09:09 PM

COMMENTS:

Obesity problem is facing us right now. People in my program have been buying less nutritious foods because they are becoming very expensive. They would rather buy anything cheap like "junk" foods just to fill them up. By revising the current WIC food package, this action will really help the targeted population to get assistance in "changing the way they eat". I highly support this recommendation to revise the WIC package as soon as possibel

LA-1265

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 11:47 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Candice Poon
EMAIL: candice.poon@acgov.org
CITY: oakland
STATE: ca
ORGANIZATION: alameda county wic program
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 27, 2006
Time: 11:46:40 AM

COMMENTS:

I am strongly in support of the proposed changes in the food packages since it is much more culturally diverse, has higher fiber contents and less of the high sugary juice and wholemilk. Our participants will truly benefit from the lowfat, low sugar healthy foods we supply instead of educating them on less juice but in reality, giving them much more juice than they should have in the house. *

LA-1266

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 9:45 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Renee Giuliani
EMAIL: reneeg@mail.hamiltontn.gov
CITY: Chattanooga
STATE: Tennessee
ORGANIZATION: Chattanooga-Hamilton County Health Department/WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 27, 2006
Time: 09:44:34 AM

COMMENTS:

I support the proposals and would love to see a specified dollar amount for fresh fruits and vegetables. So many products contain vitamin C so I feel that juices do not need to be available on WIC vouchers. Many pediatricians and dentists in our area have been on the bandwagon regarding the effects of excessive juice in regard to obesity and dental health. Most of our WIC participants are drinking far too much juice because they think it's healthy. Fresh fruits and vegetables would certainly provide sufficient vitamin C (I've never come across anyone with scurvy!). I also would like to see changes to reflect the recommendation to include more whole grain in the diet, perhaps by offering whole grain breads and brown rice instead of just cereal. Other lower fat dairy options, such as some types of yogurt, ricotta cheese or cottage cheese would be nice to have as an alternative to milk and cheese. While we promote and educate the benefits of breastfeeding, I feel the availability of supplemental formula is too accommodating, therefore affecting the length of time that Mom breastfeeds. Thank you for giving me the opportunity to submit my suggestions.

LA-1267

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 12:38 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Caty Moore
EMAIL: catymoore@gmail.com
CITY: danville
STATE: Ca
ORGANIZATION:
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 27, 2006
Time: 12:38:17 PM

COMMENTS:

With childhood obesity being one of the major public health problem nowadays, it is much beneficial to offer fresh fruit/veg in the food voucher than juice. The proposed changes will be a good move towards a healthier WIC offerings.

LA-1268

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 6:53 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Char Byington
EMAIL: cbyingto@phd7.state.id.us
CITY: Idaho Falls
STATE: Idaho
ORGANIZATION: District Seven Health Department, WIC
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 27, 2006
Time: 06:52:32 PM

COMMENTS:

I have read the proposed changes and fully support them. Adding appropriate foods for different cultures will allow us to meet the needs of a broader group of clients. It is also currently a challenge to provide our cow milk allergic children with an appropriate package. I look forward to having soy milk as a choice. Please allow the children to have access to soy milk without a prescription or medical basis. Providing fruits and vegetables to our clients will allow them nutritious options beside the large quantity of juice they currently receive. Please accept these comments as a vote in favor of making the changes!

LA-1269

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 10:51 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Renee Rajfer
EMAIL: ReneeHope1948@aol.com
CITY: Highland Park
STATE: Illinois
ORGANIZATION: Lake County Health Department, Primary Care, Wic Program
BMB Waukegan
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 27, 2006
Time: 10:51:19 AM

COMMENTS:

The proposed changes including fresh fruits, vegetables, whole grains, tofu and soy are all excellent ideas. the lower fat dairy should definitely include yogurt. It is also very important to reduce juice to an amount equal to just 6 oz per day as that is the amount we have been recommending to all participants. Many dr's are suggesting parents do not give their children any juice but rather vitamin c rich fruits or vegetables. actually eliminating juice and offering vitamin c fruits or vegetables would be an excellent idea as that would help prevent tooth decay; a tremendous problem with the wic population

LA-1270

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 1:46 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Sue Ehlbert
EMAIL: sehlbert@co.boulder.co.us
CITY: Longmont
STATE: CO
ORGANIZATION:
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 27, 2006
Time: 01:46:01 PM

COMMENTS:

I agree with reducing the amount of juice and eggs. It was way too much. I think it's going to take some time for clients to purchase the right amount of fruits and vegetables, they will have a hard time judging how much \$8 of produce is. Our clientele is mostly hispanic, they will not use the brown rice, bulgur or tofu. They'll try to get white rice and white bread most likely and might try to get the larger tortilla packs. I think it's a good change for the most part but there will be more room for abuse (or error) the cashier's job will be harder, they will let the clients either get away with getting whatever because they can't hold up the lines or they'll get more upset when they see a WIC recipient coming through their line.

LA-1271

From: gaylem@whiteearth.com
Sent: Thursday, November 02, 2006 9:56 AM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

White Earth Reservation WIC is very supportive of the proposed changes to the WIC Food Packages. The recommendations to offer fresh fruits and vegetables will have a positive impact on the grocery shopping of many of our participants. Purchasing these foods will become a routine part of their grocery shopping rather than the infrequent purchase that it currently is for many. Less juice is always good! By introducing more whole grains at an early age the children will develop a taste for these healthier choices. The availability of these choices will provide a very positive change in lifetime eating habits of our participants.

LA-1272

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 2:25 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Millie Miller
EMAIL: mmiller@co.boulder.co.us
CITY: Boulder
STATE: Colorado
ORGANIZATION: Boulder County Public Health
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 27, 2006
Time: 02:24:59 PM

COMMENTS:

I really commend the USDA for "putting their money where their mouth is."
This is a great program revision to help Americas vulnerable women, infants and children
to have the healthiest diets possible. Good work !!!

LA-1273

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 1:11 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Astrid Zagorski
EMAIL: astridzag@yahoo.com
CITY: Pittsburg
STATE: KS
ORGANIZATION:
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 27, 2006
Time: 01:10:46 PM

COMMENTS:

I think that increasing the choices will be a great help. I would like to see yogurt added as a dairy source and the fresh fruits and vegetables to be those in season at the time of purchase. As a hispanic nurse, I would really like to see nutrition education materials that are well written and proofread adequately in Spanish. I believe that would help our American citizens growing up in Hispanic families greatly.

LA-1274

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 12:04 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Kay Powell
EMAIL: kay.powell@sncos.us
CITY: Topeka
STATE: KS
ORGANIZATION: Shawnee County Health Agency
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 27, 2006
Time: 12:04:18 PM

COMMENTS:

I am writing to thank USDA/FNS for its efforts in bringing the WIC food package in alignment with 2005 US Dietary Guidelines and other nutrition guidelines including recommendations of the American Academy of Pediatrics.

I have worked with WIC since 1980 and this is the most exciting changes I have seen to help meet the nutritional needs of the WIC population.

The proposed changes add fruit and vegetables, whole grains and other whole grains, soy, tofu and canned beans among other changes to provide a greater variety of high nutrient food choices to WIC participants. These additions will allow WIC to better meet the needs of its culturally diverse population.

I support USDA's proposal to revise the WIC food package and urge USDA to finalize the rule as soon as possible.

LA-1275

From: Summers, Kathy [Kathy.Summers@snco.us]
Sent: Friday, October 27, 2006 11:59 AM
To: WICHQ-SFPD
Subject: Docket ID number 0584-AD77, WIC food Package Rule

Dear Miss Daniels,

I am writing to thank USDA/FNS for its efforts in bringing the WIC food packages into alignment with the US Dietary Guidelines and recommendations from the American Academy of Pediatrics. I fully support the changes being made in the diets of American families.

The WIC Food Package Proposed Rule offers the most significant and substantive changes to the food packages since the Program's inception in 1974.

The proposed changes add fruits and vegetables, whole grain cereals and other whole grains, soy milk, tofu and canned beans, among others, which provide a greater variety of high nutrient food choices to the WIC participants. These additions will allow WIC to better meet the needs of its culturally diverse population.

I support USDA's proposal to revise the WIC food packages and urge USDA to finalize the rule as soon as possible.

Thank you.

Kathy Summers, MS, RD, LD
WIC Dietitian
Shawnee County Health Agency
Topeka Kansas

LA-1277

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 3:45 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Beverly Hall, Waupaca WIC
EMAIL: bhall@co.waupaca.wi.us
CITY: Weyauwega
STATE: WI.
ORGANIZATION: Waupaca County WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 27, 2006
Time: 03:44:40 PM

COMMENTS:

I applaud the efforts made to revise the allowable WIC foods after over 30 years of serving WIC participants. Many changes have occurred in our lifestyles and food habits and WIC foods need to reflect those changes. Culturally acceptable foods, foods that reflect the recommendations of the new MyPyramid and the new Dietary Guidelines, and foods that are more convenient to prepare will increase acceptance of these foods by WIC participants, thereby improving their diet and health. I strongly encourage the USDA to embrace the proposed recommendations to allow us to positively affect the health of our WIC families.

LA-1278

From: WebMaster@fns.usda.gov
Sent: Friday, October 27, 2006 12:38 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Teresa Rickman
EMAIL: tmustudent@netzero.com
CITY: Lavalette
STATE: West Virginia
ORGANIZATION: WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 27, 2006
Time: 12:37:58 PM

COMMENTS:

It finally looks as if they are working harder to encourage breastfeeding. Not giving cereal until 6 months and not giving juice at all is a step in the right direction. Also the fact that exclusively breastfed infants will receive more fruits and vegies is a plus.

From: WebMaster@fns.usda.gov
Sent: Saturday, October 28, 2006 3:36 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: lynne officer
EMAIL: lynne.officer@sdarc.org
CITY: san diego
STATE: ca
ORGANIZATION: American Red Cross WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 28, 2006
Time: 03:35:52 PM

COMMENTS:

As a Registered Dietitian who has worked @ WIC for 6 years, I am excited about the opportunity to encourage a much needed change in the WIC food package. In my opinion the best proposed change is the addition of fruits and vegetables to the package. It is extremely difficult to encourage consumption of healthy fruits and vegetables when they are not an option with our WIC vouchers. I also think it is wonderful to offer the milk substitutes for our participants that have milk allergies or milk intolerance. The worst part of the proposal to me is the option for baby foods in jars. I feel strongly about making homemade baby foods as a way to save financial costs and environmental costs. I do think it is important to offer foods for the baby after six months. Thank you for considering these changes. I look forward to seeing the results.

LA-1280

From: WebMaster@fns.usda.gov
Sent: Monday, October 30, 2006 4:27 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Brenda Bass
EMAIL: mac-bass@comcast.net
CITY: Richmond
STATE: California
ORGANIZATION: WIC
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 30, 2006
Time: 04:27:18 PM

COMMENTS:

I have worked at WIC over ten years and it always amazes me how many parents believe the advertising of juice manufactures about the nutritional value of juice,even in the face of the current obesity issues. I am so in favor of updating the current food packages to includes coupons for fruit/vegetables and reducing the milk, eggs and cheese amounts in a participants coupon package.

I also think the inclusion of soy milk and baby foods move WIC more in line with what the participants are now asking for. Lastly, I believe the possible change in how partially breastfeeding women are classified according to the amount of formula they recieve is right on time.

Please allow the proposed changes to take places and change the WIC foods offered to follow what we as nutrition education counselors talk to our participants about on a daily basis. Good and basic nutrition that is low in fat and processed sugars and high in grains and fruit and vegetables

LA-1281

From: WebMaster@fns.usda.gov
Sent: Monday, October 30, 2006 10:26 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Laura Sprauer
EMAIL: laura.sprauer@tch.harvard.edu
CITY: Jamaica Plain
STATE: MA
ORGANIZATION: Brookside Health Center and Martha Eliot Health Center
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 30, 2006
Time: 10:25:42 AM

COMMENTS:

I support the proposed changes to the WIC packages.

LA-1282

From: WebMaster@fns.usda.gov
Sent: Monday, October 30, 2006 2:45 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Jennifer Haldeman
EMAIL: jhaldeman@co.boulder.co.us
CITY: Boulder/Longmont
STATE: CO
ORGANIZATION: WIC
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 30, 2006
Time: 02:44:53 PM

COMMENTS:

I support the proposed changes. I especially support the changes in the amount of juice that we would be giving to toddlers and children. Currently we give the equivalent of 6 oz/day while we recommend no more than 4 oz.

LA-1283

From: WebMaster@fns.usda.gov
Sent: Monday, October 30, 2006 4:01 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Debbie Crouch
EMAIL: Debwvrn@aol.com
CITY: Poca
STATE: WV
ORGANIZATION: Kanawha County WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 30, 2006
Time: 04:01:09 PM

COMMENTS:

Like the addition of canned beans, fruits & vegetable & whole grain breads; would like to see yogurt as a possible option. Not sure that having no formula available for breastfed infants for the first month would be a good move; it might discourage BF moms who want to supplement w/formula; they may decide to totally quit BF in order to get a formula package.

LA-1284

From: WebMaster@fns.usda.gov
Sent: Monday, October 30, 2006 3:26 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: elizabethc. keen
EMAIL: CharlestonWIC@wvdhhr.org
CITY: Charleston
STATE: WV
ORGANIZATION: WIC
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 30, 2006
Time: 03:26:10 PM

COMMENTS:

Changes were long overdue. Like the fact that we are giving fruit and vegetables to infant packages. Wonderful that we are offering only 4 oz juice/da. (One local pediatritian told a client that, "juice is a junk food for an infant"....I agree.) Like that we are offering whole grain bread.

LA-1285

From: Betty Robertson [BRoberton@co.walla-walla.wa.us]
Sent: Monday, October 30, 2006 12:26 PM
To: WICHQ-SFPD
Subject: Proposed WIC Food Changes

To Whom It Concerns,

I am a WIC Coordinator and see many obese women and children. I really am in favor of including fresh fruits, vegetables, whole grains, low fat items, &, of course, soy milk for adults. Our WIC is involved with the Farmer's Market Program and our clients love it! Also, many days, I am asked by WIC clients why soy milk, fresh fruit & vegetables, etc. are not included on the WIC checks. They are very grateful for the free foods that are provided, but continually ask these questions. So, in conclusion, once again I know any change for the positive in WIC foods would be appreciated.

Betty Robertson, RN, BSN
WIC Coordinator

LA-1286

From: WebMaster@fns.usda.gov
Sent: Monday, October 30, 2006 9:50 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Martha Stanley
EMAIL: mstanle@vdh.state.vt.us
CITY: Rutland
STATE: Vermont
ORGANIZATION: Vermont Department of Health
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 30, 2006
Time: 09:50:19 AM

COMMENTS:

Great work. Look forward to the new package as proposed. Thank you for the strong breastfeeding message.

LA-1287-

From: WebMaster@fns.usda.gov
Sent: Monday, October 30, 2006 2:01 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Mayari Carter
EMAIL: MDCarter@SolanoCounty.com
CITY: Vacaville
STATE: Ca
ORGANIZATION:
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 30, 2006
Time: 02:00:48 PM

COMMENTS:

Thank you for the opportunity to comment on the USDA's proposed regulation to revise the WIC food packages. I strongly support all of the changes proposed. The changes made to the current package will enable us to offer many of the healthy foods we continually encourage WIC participants to consume. The new food packages will provide more healthy options to the diverse population we serve, and will also improve the variety in the diets of our participants.

Thank you for considering this request,
VV- WIC Program.

LA-1290

From: WebMaster@fns.usda.gov
Sent: Tuesday, October 31, 2006 10:14 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Y. Stephenson
EMAIL: shortlink_21@hotmail.com
CITY: Berrien Springs
STATE: Michigan
ORGANIZATION:
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 31, 2006
Time: 10:13:53 AM

COMMENTS:

The new proposal is a great and innovating idea. It will give clients more choices and finally go along with the dietary guidelines and food pyramid.

LA-1292

From: Kathy Blais [Kathy.Blais@co.carlton.mn.us]
Sent: Tuesday, October 31, 2006 2:27 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD771 WIC Food Package Rules

I am the WIC Coordinator for the Carlton County WIC Program in Carlton County, Minnesota.

My concern is whether the amounts of baby food and formula can be varied between 9-12 months of age.

Many infants at 9 months of age are using chopped table foods. In fact, it is something WIC encourages.

I would like to be able to give more formula if the parent chooses not to receive the baby food.

Thank you for taking the time to consider my suggestion.

Kathy Blais, R.D.
Carlton Co. WIC Coordinator
Carlton Co. Public Health
30-10th Street North
Cloquet, MN 55720
phone: 218-878-2852
fax: 218-878-2845
kathy.blais@co.carlton.mn.us

LA-1294

From: WebMaster@fns.usda.gov
Sent: Tuesday, October 31, 2006 11:51 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Melissa Webber
EMAIL: wic46a@wvdhhr.org
CITY: Grafton
STATE: West Virginia
ORGANIZATION: Monongalia County Health Department - Taylor County WIC
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 31, 2006
Time: 11:50:52 AM

COMMENTS:

I support many of the changes that are proposed for the food packages. The reduction of juice and increase of fruits and vegetables is in conjunction with the Dietary Guidelines that recommends increasing fruit and vegetable intake, while limiting juice intake. I support the IOM recommendations of allowing \$10 for women and \$8 for children for fruits and vegetables. Due to variance in availability and office supplies to print the vouchers, I believe each state should be able to determine how to allot these funds to each participant. I strongly encourage that local WIC agencies and clients continue to have the opportunity to participate in the local farmers markets.

The addition of whole grain foods such as bread, tortillas and rice will also aid in increasing whole grain intake to at least 3 oz/day. Currently, at least ½ of cereals offered meet the whole grain requirements. I agree that more whole grain cereals need to be available; however, some medical conditions require that whole grain products be limited. I believe the CPA should still have the ability to provide corn or rice based products when medically appropriate. This would apply to all whole grain foods on the package.

Postpartum women often have low iron and protein intake, therefore the addition of peanut butter or beans will help with keeping these at appropriate levels. Canned beans are a wonderful substitute for dried beans. Many clients are not comfortable with preparing dried beans or simply do not have the time to prepare them. Also, this may increase the intake of beans and decrease the intake of the often high in fat peanut butter.

Due to dangerous mercury levels in many fish, research pertaining to the safety of mercury levels in sardines and salmon should be taken into consideration before providing those as alternatives to tuna.

When talking with my clients, the greatest drawback of the proposed change is in the reduction of milk and cheese. Many children currently drink more than the recommended ounces of milk/day. This will help in reducing calorie intake from beverages and possibly increasing calorie intake from other healthy choices. Since juice and milk will be reduced, I would hope that more children will drink more water. However, I do fear that some children and parents will replace the milk and juice with sugar filled beverages such as kool-aids, juice drinks, and sodas. Nutrition counseling and education will need to be done to help calm fears of decreasing the dairy intake of children and increasing the intake of other healthy foods.

For both women and children, non-milk protein products should be available without a medical prescription. Requiring a medical prescription will place a great burden on medical professional, clients, and WIC staff. Also, for reasons such as failure to thrive or low weight gain, whole milk is often appropriate. I strongly encourage that the CPA will still have the option to provide whole milk for children, if appropriate.

The addition of baby food fruit and vegetables and meats for fully-breast fed infants will be greatly accepted by WIC participants. The elimination of juice for infants will hopefully discourage clients from starting juices early during infancy, which is what often leads to greater juice intake in later years. The addition of meats for breast fed infants may also aid in discouraging mothers to supplement with formula. Delaying the start of cereal for infants is supporting the fact that many doctors are already recommending waiting until 6 months to introduce foods other than breast milk or formula. Since no solids would be started until 6 months, I greatly support the increase of infant formula for infants 4-5.9 months. Since this is a period where many infants consume the most formula, many clients currently have to purchase several cans a month. As for providing formula for breast-fed infants, I would like to see that each state have the option to provide no formula for the first month or one can of powder.

LA-1295

From: WebMaster@fns.usda.gov
Sent: Tuesday, October 31, 2006 5:26 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: June Conway-Alston
EMAIL: june.conway-alston@rhgnc.org
CITY: Hollister,
STATE: NC
ORGANIZATION: Rural Health Group WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 31, 2006
Time: 05:25:41 PM

COMMENTS:

I have worked in WIC for 28 years and of all the changes I have seen, this proposed Food Package change is the most welcomed. We have long needed a change in the food package to match what we are teaching. At least the WIC Food Package will begin to align with the 2005 Dietary Guidelines for Americans. It will support the American Academy of Pediatrics guidelines on infant feeding.

As front line workers, our tasks are made more difficult when we present current nutritional guidelines and preferred behaviors yet we are restricted to issue a food package that does not adequately support what we have said. I know our participants will welcome the change that allows for new foods - nutritional foods that they have requested but we were unable to provide. Our participants have enjoyed the Farmer's Market program and have wanted to know why fruits and vegetables could not be provided year round. Participants that have milk protein allergies or problems with digesting lactose will welcome the availability of soy-based beverages and calcium-set tofu. The inclusion of whole grains and additional incentives for totally breastfeeding women are welcomed changes.

I am very pleased with the Proposed Food Package. Our agency looks forward to these changes and we are hopeful tha propsed rule will move forward as expeditiously as possible.

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

NAME: Shann Holt
EMAIL: srholt@co.boulder.co.us
CITY: Longmont
STATE: Colorado
ORGANIZATION: Boulder County Public Health
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 31, 2006
Time: 12:26:33 AM

COMMENTS:

As a WIC Registered Dietitian, I very strongly support the proposed rule. These changes are so needed and beneficial, and will support the nutrition education we provide to clients at their appointments. The only proposed change I feel should be avoided is the exclusion of whole milk for children over 2 years of age. Although reduced/lowfat milk is appropriate for the majority of this age children, and is helpful in reducing the prevalence of obesity, as an RD I have counselled many families with underweight children as well, who need the extra calories and fat that whole milk can provide, and it would be difficult to not be able to offer this. I am so thrilled about the other proposed changes (especially the addition of fruits and vegetables, and elimination of juice!)- they have been anxiously awaited and are a fantastic improvement to a great program!

From: Ingrid Rosoff [irosoff@larimer.org]
Sent: Tuesday, October 31, 2006 6:23 PM
To: WICHQ-SFPD
Cc: krbaker@smtpgate.dphe.state.co.us
Subject: Docket ID #0584-AD77 WIC Food Package Rules

To Whom it May Concern:

I am in favor of the new food package, with the following considerations:

- 1) Please don't totally exclude whole milk for children over 2 & women. Our RDs like to prescribe the whole milk packages to their underweight clients. It is less expensive than prescribing a special supplement like Pediasure or Ensure. It also tastes a lot better. The client can be counselled on how to further boost the caloric value of whole milk.
- 2) Please allow WIC participants to shop for fruits & veggies at the local Farmer's Markets. Colorado does not currently have the WIC Farmer's Market program, however, it would be beneficial to our WIC clients and the Farmer's Markets, if the WIC vouchers could be accepted there.

Ingrid Rosoff, RD Med
WIC Program Supervisor

Ingrid K. Rosoff, WIC Program
970-498-6722
970-498-6721(Fax)
Larimer County Dept. Health & Environ.
1525 Blue Spruce Drive
Fort Collins, Co. 80524

From: WebMaster@fns.usda.gov
Sent: Tuesday, October 31, 2006 10:32 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: A Joseph
EMAIL: akwinsome99@hotmail.com
CITY: Niles
STATE: Michigan
ORGANIZATION:
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 31, 2006
Time: 10:31:37 AM

COMMENTS:

It is defiently time to change the WIC food packages. The current package is not even in agreement with the 2005 dietary guidelines for Americans. Adding a variety of foods, for example like soy products will not only help reduce risks of certain chronic diseases but beneficial for those who cannot tolerate milk produts. We live in a country that is very diverse and adding a variety of foods will help increase cultural acceptibility. The message for Americans is to eat more healthy by adding whole grains into your diet and comsuming more fruits and vegetables per day. With WIC serving such a large population of low income individuals it only makes sense to add good nutritious healthy foods like those mentioned on the program so they can benefit as well. WIC is on the right track for Americans to be healthy and I definelty support the changes for the new WIC food packages.

LA-1299

From: WebMaster@fns.usda.gov
Sent: Tuesday, October 31, 2006 1:57 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Mary Gilkinson
EMAIL: mgilkinson@ofoinc.org
CITY: Oneonta
STATE: NY
ORGANIZATION: Opportunities for Otsego, Inc. WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 31, 2006
Time: 01:57:28 PM

COMMENTS:

Please consider reworking portions of the proposed rule to include: bread measured in loaves, not pounds; allowing states the flexibility to offer limited amounts of formula to breastfed infants during the first month; removing the requirement for medical documentation of nutritional need for the substitution of more than one pound of cheese; adding canned chicken as well as salmon and sardines (mercury issues); allowing canned beans for dried. Finally, in recognition of the burden repeated visits to medical offices places upon participants in rural areas, I would ask that careful consideration be given to removing the recommendation for medical documentation of each food that might be re-introduced into the special needs food package.

LA-1301

From: WebMaster@fns.usda.gov

Sent: Tuesday, October 31, 2006 2:03 PM

To: WICHQ-SFPD

Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Christine Wong Mineta

EMAIL: Christine.wong@sfdph.org

CITY: San Francisco

STATE: CA

ORGANIZATION: San Francisco Department of Public Health- WIC Program

CATEGORY: WICLocalAgency

OtherCategory:

Date: October 31, 2006

Time: 02:02:34 PM

COMMENTS:

The comments below are compiled from the San Francisco Department of Public Health's WIC Program staff after a detailed discussion about the proposed WIC Food Package Revisions:

Milk:

- ~ We support the changes in the reduction of milk.
- ~ If there is a change in the amount of milk allotted, the change should also be reflected in milk coupons to one gallon per coupon to reduce milk spoilage.
- ~ Children who are over two years old and underweight should have the option of whole milk.

Milk Substitution:

- ~ WIC participants should be allowed to substitute milk with cheese, soy beverages, or tofu when requested only. Medical documentation should not be required.

Cheese:

- ~ We support the reduction of cheese.

Eggs:

- ~ We recommend keeping the quantity of eggs to two dozen, not changing it to one.

Dried Beans, Peas, and Peanut Butter:

- ~ We support the combination of beans and peanut butter to make up a package.

Canned Beans as Substitution for Dried Beans:

~ We support the substitution of canned beans for dried beans.

Canned Fish:

~ We fully support the addition of offering a variety of canned fish.

Whole Grain Bread and other Whole Grain Options:

~ It is good to offer tortilla and brown rice, which is culturally appropriate for many families.

~ We support the proposed inclusion of whole grain breads and other grain options.

~ We suggest increasing whole grains for exclusively breastfeeding women to two pounds.

Fruits and Vegetables:

~ We support the reduction in the amount of juice offered to WIC participants.

~ Exclusively breastfeeding women should be offered more fruit and vegetables as an incentive to continue breastfeeding.

~ We recommend an increase in the voucher value of fruits and vegetables.

Juice:

~ There should be a requirement of what fruits to buy, otherwise participants may be missing the nutrients in Vitamin C.

Infant Food- Fruits, Vegetables, and Meat:

~ There should be a substitution for people who make their own baby food, with cash value vouchers to purchase fresh fruits and vegetables.

~ Add more fruits and vegetables for exclusively breastfeeding mothers.

~ After 9 months, it isn't age appropriate to feed baby food from jars.

Infant Formula:

~ When no formula is offered for partially breastfed babies during the first month, it may result in a decline in breastfeeding rates.

All San Francisco WIC Program staff were in favor of changes that encouraged women to breastfeed and continued to support women to breastfeed.

From: WebMaster@fns.usda.gov
Sent: Tuesday, October 31, 2006 8:52 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Susan Parriott
EMAIL: susan.parriott@trhd.dst.nc.us
CITY: Spruce Pine
STATE: N.C.
ORGANIZATION: WIC Program, Mitchell County Health Dept., Toe River Health District
CATEGORY: WICLocalAgency
OtherCategory:
Date: October 31, 2006
Time: 08:51:31 AM

COMMENTS:

1. Please, no jars of meats for infants!!! If you have tasted them, you will know why babies refuse to eat them!! In addition, strained foods are developmentally inappropriate for infants age 7 months and above.
2. I object to reducing the amount of formula for infants older than 6 months, because this change will create formula inadequacies for many infants/families who rely on WIC foods. Many of our families are financially stretched to the limit already.
3. In spite of national obesity issues, there are frequently situations requiring the issuance of whole milk, such as an underweight child, failure to thrive, or inadequate weight gain in a pregnant woman. The availability of whole milk should remain an option for the nutritionist to individually assess.
4. Aside from the new food package rules, those of us here at the local level continue to maintain the WIC program at an extreme minimum of funding, with lower-level staff salaries, as well as higher stress-related job issues, including high demand for services with often inadequate staffing time. In an era of increasing costs for insurance as well as other job-related expenses, an increase in federal funding for the WIC program is absolutely necessary to continue services at the current level.

Thank you for the chance to submit comments. I hope you will actually pay attention to them.

From: WebMaster@fns.usda.gov
Sent: Wednesday, November 01, 2006 1:46 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Barbara H Yager
EMAIL: barbara.yager@vdh.virginia.gov
CITY: Charlottesville
STATE: Virginia
ORGANIZATION: Thomas jefferson health District-WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 01, 2006
Time: 01:45:45 PM

COMMENTS:

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 our Local health district wic program and the 3500 participants we serve, I strongly and enthusiastically support these long awaited reforms that will provide families we serve with healthier and more varied food options that are also more culturally appropriate.

The following points are concerns we would like to have noted.

1. Timely Implementation of the Final Rule- The WIC community has waited 32 years to have these science based nutrition changes. We are are eager to get started on the planning and implementation issues involved in such a comprehensive change. Therefore we are hopeful to see the Interim Final Rule by mid 2007 at the latest. States may need some flexibility to assure access to fruits and vegies in our more rural areas so special consideration may be called for.

2. Fruits and vegetables:

We strongly support providing 8.2 million WIC mothers and young children with cash value vouchers to purchase fruits and vegies. While there is some disappointment over the Department's decision to pay for fewer fruits and vegetables than the recommended amount from IOM we feel this is a good start. It is recommended that this be an area for expansion in years to come. I think the addition of infant foods will assure that more children continue with WIC past their 1 year birthday.

Milk issues

I applaud the addition of soy milk for children and would request or recommend that this be allowed without a prescription or note from the medical provider as that causes an unnecessary barrier for the client in need.

The reduction in amount of milk will be especially good incentive to assist 1yr olds transitioning to complimentary foods vs drinking their meals.

I would like to see yoghurt added as a choice for many of our European and non English participants tolerate yoghurt better than milk and are more familiar with its uses.

Eggs:

I do not see the need to reduce the qty of eggs as they are one protein source that is familiar to almost all cultures and are easy to prepare -even in the most primitive situations and has less hygiene issues associated with it. Less than one egg a day for a month is not a dietary concern.

Breastfeeding and formula issuance:

This is the only really problematic change for our district:

I feel that the omission of any formula for the first month for Breastfeeding mothers is a real turn off to trying to make it work. Many of our young mothers with first babies ask for 1 or 2 cans to have as an assurance in case they fail. It is by supporting and assuring we have been able to increase our breastfeeding success stories. -This change is too punitively presented.

The whole section on rounding up infant formula methodology and infant foods methodology is very difficult to understand and will be burdensome to implement or monitor. There needs to be more flexibility for the participants to make changes based on nutrient needs of their family.

I would recommend a max of 5 cans formula the first month for partially breastfeeding mother or at min the IOM recommendation of the choice of a) none or b) 1 can powder formula the first month.

I thin a more incentive to breastfeed might be raising the cash value of fruits and vegies to the IOM recommended \$10. for Brest feeding mother.

Juice

I would not eliminate juice as there are participants for whom fresh vegetables and fruit are not an option and fruit juice affords some vitamin intake. Also there need s to be considered the homeless population food pkgs where little prep can be done.

Overall I am very pleased to see your careful consideration and to see so many responses to this issue.

LA-1307

From: WebMaster@fns.usda.gov
Sent: Wednesday, November 01, 2006 11:59 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Mary C. Bryant
EMAIL: mary.bryant@dentoncounty.com
CITY: Denton
STATE: TX
ORGANIZATION: Denton County Health Department WIC # 35
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 01, 2006
Time: 11:58:43 AM

COMMENTS:

I am in favor of the proposed rule because it is in keeping with current guidelines and for the breastfeeding women it allows more adjustments in formula. I have worked with WIC for 17 years and feel these changes are not only long over due but that they will help use in talking to clients about current nutritional guidelines because the issued food items will match up better with recommendations.

LA-1308

From: WebMaster@fns.usda.gov
Sent: Wednesday, November 01, 2006 5:33 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Chris Rubin
EMAIL: rubinc@co.teller.co.us
CITY: Divide
STATE: Colorado
ORGANIZATION: Public HEalth
CATEGORY: WICLocalAgency
OtherCategory: Director of a Local Health Department
Date: November 01, 2006
Time: 05:32:38 PM

COMMENTS:

Support the Proposed NEW changes wholeheartedly!!!!Please add vouchers for "Farmer's markets" for the fresh fruits and vegetables!!!

LA-1309

From: WebMaster@fns.usda.gov
Sent: Wednesday, November 01, 2006 12:19 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Heidi Lewis
EMAIL:
CITY: Denton
STATE: Texas
ORGANIZATION: Wic
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 01, 2006
Time: 12:19:10 PM

COMMENTS:

I believe if we can begin to offer food vouchers for both vegetables and fruits that our WIC children and families will be able to benefit so much. The idea of reducing the amount of juice offered also is an excellent idea as this money could instead make the whole fruits available to our clients. In the long run it will make a huge difference on our epidemic with obesity.

LA-1311

From: WebMaster@fns.usda.gov

Sent: Wednesday, November 01, 2006 10:46 AM

To: WICHQ-SFPD

Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Bethany Zull
EMAIL: lizziebeth06@gmail.com
CITY: Muncie
STATE: IN
ORGANIZATION: Open Door Community Services WIC
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 01, 2006
Time: 10:46:16 AM

COMMENTS:

I am very encouraged by this proposal and agree that "it is about time"! As a WIC nutritionist I see a great need in the inclusion of fruits and vegetables especially, as well as the addition of soy products. Because of the parishable quality of fresh produce and whole wheat breads it is important to have a good supply available. Also the reduction in infant formula is a welcome change. I see too many mothers giving up on breast feeding for the "freedom" of the free formula that we (who promote breast feeding), provides in massive quantities. If formula took more of a toll on the wallet women would be hopefully be less inclined to chose formula for feeding their infants. I propose that eventually formula be reduced to a fraction of its current (9-10 cans powdered)amount, and once breast feeding numbers climb, eliminated completely. This may sound completely extreme, but because of the current research linking formula feeding to obesity, allergies, ear infections etc.. (it does start from the cradle), it is imparative that we considar the health of future generations of WIC partisipants and not encourage formula consumption at all. Bravo on a job well done with these changes. I am excited to see the results.

LA-1312

From: WebMaster@fns.usda.gov
Sent: Wednesday, November 01, 2006 10:43 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Dawn Pinto
EMAIL: dpinto@intercare.org
CITY: Paw Paw
STATE: Michigan
ORGANIZATION: InterCare Community Health Network
CATEGORY: Other
OtherCategory: WIC Local Agency Staff Member
Date: November 01, 2006
Time: 10:42:41 AM

COMMENTS:

I am in support of the proposed rule changes. I also would like to see tuna replaced with some other protein for breastfeeding women, as the new guidelines state that even in small amounts it contains too much mercury.

LA-1314

From: WebMaster@fns.usda.gov
Sent: Wednesday, November 01, 2006 6:13 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Miranda David
EMAIL: davidm@co.teller.co.us
CITY: Divide
STATE: CO
ORGANIZATION: Teller County Public Health
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 01, 2006
Time: 06:13:09 PM

COMMENTS:

I'm excited to support these changes. It often seems that the education we provide about nutrition and the information about foods that we provide send incongruent messages. This will do so much to improve that situation. It will be wonderful to provide services that are more in line with ideal nutrition recommendations. I hope there is a way to allow clients to get their fruits and vegetables from local farmer's markets.

LA-1315

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 6:36 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Maria Ambriz
EMAIL: mariaa2@clinicas de salud.org
CITY: brawley
STATE: california
ORGANIZATION: Clinicas de Salud WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 06:35:33 PM

COMMENTS:

I think the change is a great thing because people will have the resources to prepare nutritious meals for their families therefore people will learn and want to eat healthy.

LA-1316

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 6:31 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Cynthia atondo
EMAIL: mariaa2@clinicas de salud.org
CITY: brawley
STATE: california
ORGANIZATION: Clinicas de Salud WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 06:31:11 PM

COMMENTS:

I think the proposed change is a great Idea by making these changes participants will have nutritious meals and it will help reduce childhood obesity and all other illnesses such as diabetes, cholesterol, and high blood pressure.

LA-1317

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 6:28 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

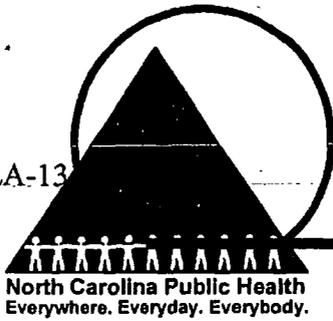
NAME: margarita ibarra
EMAIL: mariaa2@clnicasdesalud.org
CITY: brawley
STATE: california
ORGANIZATION: clinicas de salud WIC program
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 06:27:35 PM

COMMENTS:

I would love to have the packages approved because it will improve the way our participants eat and their health.

LA-13

LA-1318



North Carolina Public Health
Everywhere. Everyday. Everybody.

Buncombe County Health Center

35 Woodfin Street Asheville, NC 28801-3020

(828)250-5203 FAX: (828)250-6173

MPH Steve Swearingen, MD

George F. Bond, Jr.,

Health Director

Medical Director

11-02-06 email from Janet Trulove [Janet.Trulove@buncombecounty.org]

November 1, 2006

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

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

Dear Ms. Daniels:

The Buncombe County Health Center WIC Program would like to comment on the proposed changes to the WIC Program food package. Over all, we strongly agree with most of the suggested changes and are excited that they are actually likely to occur this time.

We would recommend that juice be deleted from the children's food package altogether and increase the voucher for fruits and vegetables. The American Academy of Pediatric Dentists does not recommend juice every day for children.

Our IBCLC has concerns over the rule of no formula the first month for exclusively breastfed infants. She feels that there are cases where supplemental formula is needed on a temporary basis, in order to support the breastfeeding mother and infant. We would encourage that the IOM report be revisited regarding one can of formula in the first month.

We would encourage you to consider implementing all changes at one time. It would appear that the suggested pilot for partially breastfed clients would deny them access to fruits and vegetables that other WIC clients would receive. This would result in women choosing to formula feed over breastfeeding in order to receive the fruits and vegetables.

Our program is excited about the proposed rules and knows that our families will benefit from these changes. It is our hope that the changes will result in better food choices for them, resulting in healthier families.

Sincerely,

Janet R. Trulove, MS, RD, LDN
Nutrition Program Manager

Buncombe County Health Center services and employment opportunities are offered to all people regardless of race, color, national origin, sex, religion, age or disability.

11-02-06 email from Melina Hudec [mjhudec@hotmail.com]

WIC Food Package Changes
Comments from Local Agency 27
Community Action Partnership of Cambria County

1. Staff feel that eliminating formula in the first month will discourage the continuance of breastfeeding. Instead of eliminating, possibly decrease the maximum amount from 6 cans to 2 cans.
2. We agree with the changes regarding the "partially bf" infant. A breastfed baby should not need 6 cans of formula per month. If a partially bf infant receives enough formula to be considered fully formula fed, will the mom's package be a standard package like the current postpartum package?
3. Powder infant formula changes...good for participant.
4. We agree that there should be a decrease in formula after 6 months, however, it is too confusing to the client to have an increase at 4-5 months and then a decrease at 6-11 months. Three cans between 0-3 and 4-5 months is not a significant amount. Have one set amount for 0-5 months and then decrease at 6-11 months. This change is good because there is too much overfeeding of formula after 6 months.
5. We agree with the decrease in formula for a bf baby after age 6 months (same as with formula), but possibly allow at least 2 cans/powder for the 1st month. It is too confusing for clients/staff to have no formula for 1st month, some for 1-3 months, more for 4-5 months and less for 6-11 months. Give us a maximum amount for the 1st month, 1-5 mos and after 6 mos.
6. Please continue to not allow low iron formula.
7. Do not agree with "rounding up".
8. Possibly start cereal only at 5 months and then start jar foods at 6 months.
9. It is better for infants to be provided jar foods vs. juice. Too many babies are given 8 oz bottles of juice. This may still occur, but at least WIC isn't the cause. It is great to give single ingredient fruits and veggies...too many clients skipping these foods and offering desserts and dinners! Some staff feel that excl bf babies getting more jar food is great to encourage keeping up with bf, while others think it is not fair.

10. Why only bf babies getting meat?

11. Clients should have the choice of what kind of milk to buy. It is up to us as nutrition educators to help them make an informed choice to what their child needs.
12. Some clients complain they get too much milk and some say it's not enough. Keep maximum amounts as is and let the nutritionist tailor food package based on need and want.
13. Milk substitutions are great. Soy milk is definitely a plus. Milk allergies seem to be more common now. Tofu will probably not be requested too often in our area.
14. Eggs should not decrease
15. Offering PB and beans to pregnant and bf women is a good idea.
16. Offering PB and beans to post partum women is a good change.
17. Unfortunately, a lot of clients say they don't buy the beans. Offering canned beans will make it easier to cook them, therefore, more clients will possibly buy them.
18. Reduced fat PB...good idea.
19. Decreasing juice is good and bad. Children are drinking too much juice, but if WIC provides, less then they may be offered kool-aid. This is a big decrease.
20. Obviously, clients receiving fruit and vegetable vouchers is a great idea, however will clients use these as little as they use the FMNP vouchers? Separate vouchers may be confusing to the client and it's more to get lost.
21. and 22. Offering whole grain food is a great idea. Hopefully it will be clear to the client what foods they are allowed. Will you have pictures on a food list?
23. Canned fish options...good.
24. Special formula requirements – not much change from current requirement.
25. Allowing special formula as well as other foods besides juice and cereal is a good change.
26. Allow infants to receive special formulas designed for children and adults if it is medically necessary.

27. Addition of new medical foods...good. How to determine the maximum amounts? (not sure) Let the doctor prescription determine amount we provide.

28. More reasons to provide RTF is a good thing.

29. Allowing infant cereal as a substitute for adult cereal when medically necessary is a good change.

30. Good

Overall, there is a lot of good changes. By offering foods such as fruits and veggies and whole grain foods, we are enabling parents to have these foods in the house. This is teaching their children healthy eating habits at an early age. They may take these habits into adulthood.

Does WIC Administration acknowledge that the addition of new foods and all the changes with maximum amounts of formula, etc. will take more time in clinic. It will take more time explaining what they're allowed and more time tailoring their food package based on their age, needs and wants.

LA-1320

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 6:38 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: CYNTHIA CURIEL
EMAIL: MARIAA2@CLINICAS DE SALUD.ORG
CITY: BRAWLEY
STATE: CA
ORGANIZATION: BRAWLEY WIC
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 06:38:15 PM

COMMENTS:

THIS CHANGE WOULD DEFINITELY BE GREAT FOR OUR PARTICIPANT. I
HAVE DISCUSSED THESE CHANGES

LA-1321

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 6:13 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Edith Necochea
EMAIL: edithnecochea@sbc.net
CITY: El Centro
STATE: ca
ORGANIZATION: clinicas de salud, WIC Nutrition Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 06:12:38 PM

COMMENTS:

I would like to thank The U.S. department of agriculture Food and Nutrition Service for this new food package change. I think is more healthy and a good new options for mothers and children.

LA-1325

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 3:53 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: mary dervan
EMAIL: mdervan@intercare.org
CITY: holland
STATE: michigan
ORGANIZATION: Intercare community health network
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 03:53:06 PM

COMMENTS:

I have worked for 18 years for the WIC Program and have not seen much change in the food packages. I am very excited to hear the proposed food package changes, reflecting healthier food choices, eg. addition of fruits and vegetables for all age groups, limits of milk and cheese, limits of juice and deletion in the infant package, canned beans versus dried beans, low fat milk for 2 year olds and older, and alternative calcium-rich food sources.

My primary apprehension is in the exclusively breastfed infant, 0-1 month of age. It is proposed that infants who are exclusively breastfeeding do not get any formula during the first month. Although I am an avid breastfeeding promoter, I get a strong sense from the WIC moms that if they know that they will get no formula during the first month, they may opt to not breastfeed at all. Many of our moms do not have extra money to spend on formula and that is a very real concern. If we could some how funnel money that would have been spent on a formula package on breastfeeding support to all our breastfeeding moms then I would feel more comfortable with this rule. We do not have any breastfeeding peer counselors in our agency and we frankly do not have enough man power to give each breastfeeding woman the adequate support to have breastfeeding continue successfully during that difficult time, the first few weeks.

I would like to see the option of possibly of having exclusively breastfed infants get 1 can of formula during that first month to give the apprensive breastfeeding mom some backup--it may give her more confidence to at least try to breastfeed. I think that we will see fewer women decide to breastfeed because they will be afraid that they will have no way to get formula if they should quite breastfeeding during that first month.

I thank you for taking on this huge endeavor and look forward to the new food packages.

LA-1326

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 3:59 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Anita C. Floyd
EMAIL: acfloyd9814@charter.net
CITY: Birmingham
STATE: Al.
ORGANIZATION: Jefferson County Department of Public Health
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 03:59:00 PM

COMMENTS:

I support the proposed changes to the food packages.

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 12:24 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Cheri Nemec, RD, CD
EMAIL: cnemec@glitc.org
CITY: Lac du Flambeau
STATE: Wisconsin
ORGANIZATION: Great Lakes Inter-Tribal Council
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 12:23:54 PM

COMMENTS:

The proposed changes to the WIC Food Packages are much more consistent with the recommendations see in the 2005 Dietary Guidelines. When thinking of the population in which I work, there are two very important changes. The first is the addition of fruits and vegetables. In the Native American population, diets have changed drastically from the traditional food sources. Fruits and vegetables were once a major portion of what was harvested. Today, few have the skills to plant their own produce and thus have very little access to it. Adding it to the food package will be a great benefit as is the reduction of the amount of juice to a portion recommended by the dietary guidelines.

The second change is the flexibility to substitute soy products in place of milk. Many of our participants have a history of dairy intolerance or lactose allergies. Requests for soy milk are made often and would be a great addition.

The proposed changes do seek to promote and support breastfeeding. However, I believe by completely denying mothers access to formula in the first month may be detrimental. Many mothers may choose to identify their infants as formula fed as they feel the formula is a safety net. I think the benefits that breastfed babies and mothers will receive are excellent incentives to keep the amount of formula at a minimum.

I look forward to the future when we are able to offer our participants a healthier WIC food package and appreciate the extreme effort that were contributed to this process.

LA-1328

From: Bond Westerman, Betty (Health) [Betty.BondWesterman@nashville.gov]
Sent: Thursday, November 02, 2006 4:49 PM
To: WICHQ-SFPD
Subject: "Docket ID Number 0584--AD77, WIC Food Packages Rule"

I am in agreement with all of the changes that are being proposed. It is a long time coming and should help with increasing the breastfeeding rates as well as reducing obesity within the American population.

Sincerely,
Betty Westerman

Betty Westerman, MS, RD.
Lentz WIC Clinic Supervisor
311 23rd Avenue North 37203
Phone: 615-340-2215

LA-1330

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 5:45 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Irma N. Martinez
EMAIL: irmam@clnicasdesalud.org
CITY: Brawley
STATE: California
ORGANIZATION: Clinicas de Salud del Pueblo Inc.
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 05:45:22 PM

COMMENTS:

The new proposed food packages would be very beneficial to our participants because is align with the 2005 Dietary Guidelines and reflects the recommendations of the American Academy of Pediatrics, its variety and flexibility to reach some foods that in other way are not accessible;" are the best options as nutritious foods and very helpful in the growth and development of childrens". Also it accomodates to different cultures of people we serve as shown in the comments they have stated.

From: Theresa Landau [Theresa.Landau@nychhc.org]
Sent: Thursday, November 02, 2006 7:50 PM
To: WICHQ-SFPD
Subject: Docket IF Number 0584-AD77, WIC Food Packages Rule

Attachments: Morrisania Letter.doc

Please read the attached:

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TREATMENT CENTER A DIVISION OF GENERATIONS + HEALTH NETWORK
WIC PROGRAM
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landaut@nychhc.org
Theresa Landau, M.S., R.D., CDN
WIC Program Director

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

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

Dear Ms. Daniels:

The Morrisania Neighborhood Family Health Center (NFHC) WIC Program wholeheartedly supports the USDA Revisions in the WIC Food Packages: Proposed Rule, published in the Federal Register on August 7, 2006. This proposal represents the most significant change to the food packages in over thirty years and will provide millions of mothers and children with WIC's positive nutritional support. We applaud USDA/FNS for proposing these changes and for being responsive to the needs of the mothers, children and families. We do have some recommendations which we believe will further strengthen the WIC Program.

Morrisania WIC Program Recommendations for Changes to the Proposed Rule

The Morrisania WIC Program urges the following modifications to the proposed rule to better accommodate the needs of WIC mothers and children and address the concerns of the WIC community.

Alternative Dairy Products

* Establish an alternative minimum nutrient standard for soy beverages. Currently, there are no calcium-fortified soy beverages in the marketplace that meet the proposed nutrient standard of 8 grams of protein and 349 milligrams of potassium per 8 ounce serving. We support NWA's recommendation that the specifications for protein and potassium in calcium-fortified soy beverages follow the FDA and industry standards for protein at 6.25 grams minimum and for potassium at 250 milligrams per 8 ounce serving. Since protein is no longer a priority nutrient and the addition of fruits and vegetable contribute to the food packages' potassium content, this adjusted specification will not affect the nutritional needs of participants who substitute soy beverages for cow's milk.

* Waive the medical documentation requirement for children to receive soy beverages. The consumption of soy beverage for children can be a cultural/personal preference as well as a medical necessity. Since State policies and procedures for services and follow-up to medically diagnosed conditions will continue to be in place, this proposed rule will place an undue burden on State systems and more importantly will delay access to an important calcium source for WIC children

Breastfeeding Women and Infants

The Morrisania WIC Program firmly believes that breastfeeding is the optimal feeding method and provides the best nutrition for most infants. We have been committed to the promotion and support of breastfeeding since the inception of our WIC Program. We were the first WIC Program in the northeast region to implement a WIC Breastfeeding Peer Counselor Program in the 1980's and are very proud of our current successes. Our Breastpump Program is the largest and most successful in New York State. We fully endorse the principles behind the proposed infant feeding options. We also understand that WIC's current role of providing formula in the early post partum months may be perceived by some as undermining breastfeeding support; however, we also firmly believe it is the responsibility of the WIC nutrition and lactation professional to tailor a food package designed to specifically meet the needs of the individual participant. We are concerned that the proposal to not allow breastfed infants to receive any formula during the first month of life may contribute to many of these infants receiving more formula, rather than less or none, during this critical period. It is essential that we work with each mother/baby dyad individually * and respond to their special needs. In a world where breast reduction surgery with no thought of future breastfeeding or failure to thrive infants or inadequate support and assistance in hospitals leading to less than ideal breastfeeding situations is becoming more commonplace, WIC needs to work with our

moms to achieve exclusive breastfeeding. Success is defined differently for each situation. For the Mom who had no intention of breastfeeding, yet predominantly breastfeeds * WOW - that is success. If the proposed rule is issued as stated, this mom would likely request a formula package, rather than no formula during this first month. Therefore, we recommend:

* Give States the option to provide the breastfeeding infant, in the first month, with 1) no formula, or 2) one (1) can of powdered formula or its equivalent as recommended in the IOM Report. States would incorporate their option into their existing breastfeeding policies and procedures. Criteria for issuance should be based on participant need determined by individual States. An evaluation of the impact of these options on a mother's decision to breastfeed will allow USDA to determine an appropriate future course of action.

* Provide an additional \$2 to the fruit and vegetable vouchers for the fully breastfeeding woman's food package in order to bring the cash-value vouchers to the original IOM recommended amount of \$10 per month. The increased dollar amount would provide an additional incentive for women to breastfeed while maintaining WIC food package cost neutrality.

* Implement the proposed rule for the fully breastfeeding, partially breastfeeding, and fully formula feeding packages concurrently without the pilot phase. The concept of a test period for introducing the partially breastfeeding food packages may seem reasonable, but the delay in implementation, which would be over three years, is unacceptable. NWA believes that the fully formula feeding package will have significantly more appeal to mothers than the current partially breastfeeding package. Without full implementation, the proposal to delay would only provide a disincentive for women to breastfeed.

* Allow partially breastfeeding women who no longer receive food benefits to be provided with breast pumps. For partially breastfed women who no longer receive food instruments but will continue to receive nutrition education, breastfeeding promotion and support, and health and social services, NWA recommends that breast pumps be made available through the use of food dollars, when appropriate, to support these women's efforts to breastfeed. This is important especially in States where breast pumps are purchased solely with food package funds.

Fruits and Vegetables

* In addition to the recommendation to increase the dollar amount of cash-value food instruments for fruits and vegetables to \$10 for fully breastfeeding women, USDA should seek additional funding in its future budget requests to allow for full implementation of the IOM recommendation of \$10 cash-value

instruments for all women and \$8 for children. Cutting corners with the fruit and vegetable cash-value instruments will lead to reduced health benefits for WIC mothers and children. WIC's success has been in saving long-term healthcare costs. Making this modest investment will assure healthcare savings in the future.

* Cash value vouchers are the best way to implement the inclusion of fruits and vegetables in the food package. However, as currently framed in the proposed regulations, they violate one of the basic principles of the WIC program; that the benefits are indexed for inflation. One of the most important features of WIC, for the last three decades, is the guarantee that participants receive a specific quantity of food each month regardless of the cost. If the price of the WIC food increases, the participant does not lose out. We believe that this aspect of WIC has significantly contributed to the program's success in achieving positive health outcomes. To disallow the same treatment for the fruit and vegetable vouchers will cause this benefit to erode over time. The regulations wisely include a provision where USDA could ask for an inflationary adjustment to the cash value of the fruit and vegetable vouchers; however, we think this provision must be strengthened. We strongly urge that the value of the fruit and vegetable benefit be indexed for inflation. This would preserve the nutritional value of the food package even during times when there is pressure to cut costs. Additionally, we recommend that all States be mandated to provide the full cash value as proposed in the regulations

* Allow State agencies to determine the dollar denomination on the cash-value food instruments so that States can cost-effectively implement these changes within their individual participant and infrastructure environments. It is essential that state agencies determine the dollar value of the cash-value vouchers in partnership with vendors to assure appropriate redemption levels and to save already tight Nutrition Services dollars. Printing of multiple voucher instruments in small denominations is costly and counter productive.

* Allow States, through their retail store authorization procedures, to specify the minimum stocking requirements for fruits and vegetables. This will give States the ability to work with local grocers to provide the maximum number and variety of fruits and vegetables that are locally accessible, culturally appropriate and affordable. Setting the minimum stocking level arbitrarily at two will not encourage State agencies or vendors to provide the wide variety of fruits and vegetables WIC clients purchased as demonstrated in the three highly successful pilot projects conducted recently in California and New York.

* Allow States to utilize existing Farmers' Market Nutrition Program vendor certification and coupon redemption procedures for authorizing Farmers' Markets to participate in the WIC fruit and vegetable cash-value voucher program. NWA supports the option of authorizing Farmers' Markets as a choice for participants to redeem their cash-value food instruments for fresh fruits and vegetables. The proposed rule requirements would make this option impossible to implement for the following reasons:

- * Farmers' Markets do not meet the existing federal selection criteria with regards to the variety and quantity of foods that must be stocked.
- * Farmers generally do not sell from fixed sites and mobile stores are allowed only for the purpose of meeting special needs as described in each State agency's State Plan.
- * Farmers would be held to current monitoring and auditing requirements.

- * Allow States to utilize systems already in place would provide the flexibility needed by both farmers and States to make this unique model a workable option.

Whole Grains and Whole Grain Breakfast Cereals

- * Maintain the proposed criteria for breakfast cereals (iron, sugar and whole grain) and allow States the flexibility to make appropriate substitutions to accommodate individual participant needs based on a documented medical condition. The proposed criteria for whole grain breakfast cereals eliminate single-grain corn and rice cereals from the eligible list of cereals. Participants with special conditions, such as allergy to wheat or gluten-intolerant, will be limited in breakfast cereal choices. NWA recommends that in cases when a participant presents with a medical diagnosis warranting a "wheat-free" cereal, that a special package be issued that includes cereals that meet the iron and sugar criteria.

Categorical Tailoring and Substitution Requests

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

Rounding Up of Formula

- * NWA recommends that USDA develop an alternative solution to the proposed rounding up methodology for infant formula that allows for consistency in the number of cans of formula provided. The proposed methodology for the State rounding option will result in a mother receiving a different number of cans of

~~formula each month. This could prove confusing and be viewed as discriminatory by WIC mothers.~~

Fish

* We support the inclusion of canned sardines and salmon in addition to the tuna. However, due to the high mercury levels in the canned fish, we recommend canned chicken as another alternative.

In summary, NWA 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.

Thank you for this opportunity to comment on these important changes. Because we believe this will have such a positive impact on participants, we encourage USDA to issue a final rule by April 2007. We are looking forward to working with you to implement these important changes.

Sincerely,

Theresa Landau, MS, RD, CDN, CLC
Morrisania WIC Director

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Dear National WIC Association, From: Linda Benton [lindab@stcroixtribalcenter.com]
Sent: Thursday, November 02, 2006 4:57 PM
To: WICHQ-SFPD
Subject: Revisions to the WIC Food Package Rule

Dear National WIC Association,

Thank you for the opportunity to comment on the proposed revisions. I would like to take this opportunity to comment on a few of the changes. I am a Maternal/Child Health Nurse, and have worked for a Native American Tribe for eight years. Our federally funded Healthy Start project, called Honoring Our Children, and the state funded Rural Infant Health Project, network with WIC and other Human Services professionals at our Tribe to provide optimal services with minimal resources. Because of this, I am quite familiar with WIC, both as a successful program on its own and as a gateway program for all of our maternal/child health initiatives.

One of the changes that I am concerned about is the proposal to decrease the amount of formula available to infants at six months of age. Our dietitian and nursing have worked together to try to encourage delaying the introduction of solids until four to six months. This has been difficult, as mothers are often encouraged by others to feed their infant cereal from the time they are a newborn. We are making some headway in delaying solids by encouraging mothers, fathers, and grandparents to watch for developmental cues that signal readiness for solids. Economics usually play the trump card, though, in decision making, and if they are anticipating or experiencing formula shortages, families will begin solids sooner. We also educate clients about the danger of regular cow's milk for infants, and educate clients that WIC is a supplemental program, but again, economics often lead to decisions to begin cow's milk long before 12 months of age. I believe that a decrease in formula at such a young age, and before solids are well established, might well lead to an increase in the use of cow's milk for infant feeding.

We educate from early in pregnancy to encourage breastfeeding, but social and relationship factors for many of our clients have led to breastfeeding rates lower than we would like to see them. Slowly, we have seen more women willing to breastfeed, but they are tentative about it. I fear that if a woman must choose to breastfeed with no chance of receiving formula for two months, or not to breastfeed, they will choose the latter. The social and relationship factors in their lives have not changed, but our relationship with them combined with education sometimes tips the scales toward breastfeeding despite their insecurities. I fear that this rule change will tip the scales the other way.

Native Americans have a high rate of lactose intolerance; it is not an indigenous food. The proposed change to add soy milk is welcome. Another food that is well tolerated by Native people and would add the desired nutrients to the diet is yogurt. I realize that

some yogurts are high in sugars, but some brands are low in sugar, high in beneficial bacteria, and delicious. As a nurse, I would welcome the addition of beneficial bacteria to the diet as it should lower the incidence of some infections, especially of the gut and urogenital areas. I would encourage you to consider adding this nutrition-packed but somewhat cost-prohibitive food to your package.

Thank you for the opportunity to comment on these proposed changes. Kudos for a program that is fundamental to healthier families.

Sincerely,

Linda Benton, RN
St. Croix Tribal Health
4404 Sate Road 70
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lindab@stcroixtribalcenter.com

From: Jennifer Baldini [jbaldini@sirentel.net]
Sent: Thursday, November 02, 2006 2:54 PM
To: WICHQ-SFPD
Cc: Linda Benton
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

To Whom It May Concern,

Thank you for the opportunity to comment on the revisions in the WIC Food Packages Proposed Rule. I strongly support the USDA issued proposed rule governing the WIC Food Packages published in the Federal Register on August 7, 2006. However, I have a few concerns about some of the proposed changes:

1. As a WIC dietitian serving two Native American WIC programs for almost 6 years, I see several clients with lactose intolerance issues. Dairy was not a food indigenous to Native Americans and as a result Native Americans often lack adequate amounts of the enzyme lactase to properly digest and tolerate dairy products, in particular milk. The proposed rule allowing soy and tofu as dairy substitutes is a welcome and much longed for change amongst my clients. However, I would urge the USDA to reconsider the IOM's recommendation to allow yogurt for WIC clients with documented lactose intolerance issues. Yogurt is a palatable and well accepted dairy substitute among many of my Native American clients. However, yogurt can be cost prohibitive. Allowing clients to purchase yogurt with their WIC vouchers will go a long way towards eliminating the persistent and long-standing issue of inadequate calcium intake amongst Native American WIC participants.
2. The proposed rule to allow no formula for partially breastfed infants in the first month is very troubling for me. Many women I see are insecure about their abilities to successfully breastfeed (even if they have breastfed other children in the past). Having the "security" of knowing that a can or two of formula is available from WIC helps women make the choice to initiate breastfeeding and continue it after the baby is born. I fear that if women are told that are unable to get formula for a breastfed infant until the baby is two months old, they will become discouraged and choose not to breastfeed at all in order to get formula. When a woman is faced with the choice: breastfeed and get no formula or get formula but not breastfeed, my experience has shown that the majority of women will choose to take formula over breastfeeding.
3. The proposed rule to decrease the amount of formula available to infants at 6 months from 884 fl oz reconstituted liquid to 624 fl oz reconstituted formula has the potential to be very problematic. Currently, WIC clients are educated to delay starting infants on solids until 4 to 6 months. Further, clients are taught the developmental cues to look for to indicate their infant is ready to start complimentary foods. An infant at 6 months may just be starting complimentary foods and not able to consume them in sufficient

quantities to reduce their intake of formula until they are older. In addition, I see several infants that are developmentally delayed due to various reasons - drug or alcohol use during pregnancy is a big issue I see with my clients that leads to these developmental delays. These infants often are not ready to consume complimentary foods in adequate amounts until after 6 months. For these reasons, reducing the amount of formula allowed after 6 months could have disastrous consequences for infants. Though clients are educated over and over that WIC is a supplemental program only and they need to plan and budget to purchase additional formula, the fact is that many people here rely on WIC to provide the majority if not all of their formula needs. With the allowed amount of formula available after 6 months so markedly decreased combined with the fact the formula needs of infants at 6 months is often still very high (as discussed above), it is likely that several clients will resort to giving their infant regular cow's milk or introducing foods that their child is not developmentally able to tolerate. I would encourage the USDA to consider decreasing the amount of formula available to infants at 9 months rather than 6 months. This would give infants the time to insure they are developmentally able to establish an adequate complimentary food intake before decreasing the amount of formula they use.

Once again, thank you for giving me the opportunity to respond to the proposed rule and thank you for your time and consideration.

Sincerely,

Jennifer L Baldini

Jennifer L Baldini, RD, CD
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jbaldini@sirentel.net

From: LOOMIS Kathleen J [kathleen.j.loomis@co.multnomah.or.us]
Sent: Thursday, November 02, 2006 5:59 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Dear Patricia N. Daniels:

As a WIC Supervisor for a local agency, I strongly support 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 proposed packages provide WIC participants with a wider variety of food choices, allow state agencies greater flexibility in offering food packages that accommodate participants' cultural food preferences and address the nutritional needs of our nation's most vulnerable women, infants and children.

The proposed rule aims to support breastfeeding for the first six months and continued breastfeeding, with the appropriate complementary foods, until the infant's first birthday. I recommend that the fully breastfeeding, partially breastfeeding and fully formula feeding woman's package changes be implemented concurrently. Doing otherwise risks the possibility of women choosing to formula feed.

I strongly support the addition of infant food fruit and vegetable at six months of age and the addition of fruits and vegetables for our children and women. The food package recommendations support research findings, which suggest that increasing fruits and vegetables is associated with reduced risk for obesity and chronic diseases such as cancer, stroke, cardiovascular disease and type 2 diabetes. Fruits and vegetables added to the diet also promote adequate intake of priority nutrients such as Vitamins A, C, folate and potassium and fiber.

Dealing almost daily with clients that suffer medical consequences of milk protein allergy, lactose maldigestion and those with cultural preferences, I resoundingly support the proposed food package offering of calcium-set tofu as well as calcium- and vitamin D-rich soy beverages as partial substitutions and alternatives for milk. I would ask that children be able to receive the soy products without the requirement of medical documentation.

The proposed rule to include whole grain bread and other grains for all children and pregnant and breastfeeding women is consistent with the 2005 Dietary Guidelines for

Americans which recommend that refined grains be replaced with whole grains. I also support this change.

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

Thank you for putting forth the proposed packages and moving forward with their implementation.

Kathleen

Kathleen J. Loomis, RD
WIC Nutritionist Supervisor
Multnomah County East Clinic
600 NE 8th St., Room 230
Gresham, OR 97030
(503) 988-3663 x29869
FAX (503) 988-6065

From: WebMaster@fnis.usda.gov
Sent: Thursday, November 02, 2006 3:10 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Sarah Anderson
EMAIL: sadocowic@superior-nfp.org
CITY: Duluth
STATE: MN
ORGANIZATION: Northwest Wisconsin Community Services Agency-Douglas County
WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 03:10:03 PM

COMMENTS:

I support the changes as proposed in the IOM report. However, I strongly recommend that a high priority be placed on offering a partially breastfed infant food package, and that up to 2 cans of formula be available for breastfeeding moms in the first month of breastfeeding. Many of the clients I work with lack self confidence in regard to breastfeeding and their ability to make enough milk for their child. They get a lot of messages that when a baby is formula fed one can see the child "is getting enough", when breastfeeding they are unsure baby "gets enough". It takes a minimum of one month for some women to establish the confidence they need to refine the art of breastfeeding a child. Many say they want a safety net, knowing formula is available "just in case..."

LA-1337

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 7:36 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Ka Mei Tso
EMAIL: tictok11@gmail.com
CITY: New York
STATE: NY
ORGANIZATION: NY Downtown Hospital WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 07:35:52 PM

COMMENTS:

To Whom It May Concern:

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

- Instead of giving up to 6 cans of juice per month, it should be limited to 1-2 cans per month especially when children under age 5 should not be drinking more than 3-6oz per day. The rest should be given in the form of fruits and vegetables. And allow the participants to choose the kinds of fruits and vegetables they want. When WIC tested the fruits and vegetables pilot program with the \$5 check earlier this year, the participants came back asking for more. In addition, it will help increase intake of fresh fruits and vegetables. It's unfortunate that so many children drinks so much juice that they don't even drink water when they are thirsty.
- Allow WIC participants to choose whole grain cereals.
- To provide the choice of soy beverages as a substitute for milk is a must. When children are lactose intolerant, we are able to provide Lactaid milk. But when children cannot tolerate cow's milk, there is nothing we can offer them. Instead they continue on the soy or special infant formula, with the validation of a doctor's prescription. Many do stay on formula up to, and even after, 3yr, if not until 5yr because they cannot tolerate cow's milk. In addition, there should be an age limit to the continuation of infant formula. To continue infant formula for children is very costly for WIC. Besides, it's difficult to imagine any children 3yr+ still willing to drink infant formula.

- All children should be on 1% or skim milk by the age of 2yr. Once they turn 2yr, whole or 2% milk shouldn't be a substitute for the default package.

- The disallowance of infant formula for breastfed infants during the first month of life, including those who are partially breastfeeding may back fire. Many mothers may tell us they aren't breastfeeding, even though they are, because they want to get infant formula for their babies, especially in the baby's first month. As a result, the breastfeeding rate may go down. As it is now, when partially breastfeeding babies get less than the full package, mothers tend to tell us they are no longer breastfeeding even though they are breastfeeding at home, and sometimes even in the WIC office, just because they want the maximum number of infant formula per month.

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,

Ka Mei Tso

LA-1339

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 7:03 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: guadalulpeSanchez
EMAIL: mairaa@clinicas de salud.org
CITY: el centro
STATE: ca
ORGANIZATION: clinicas de salud, WIC Nutrition Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 07:03:04 PM

COMMENTS:

looking forward for food instrument food package change. all of our quailify wic ppt will benefit from varity of foods able to buy with their vouchers.
Thank you for considering making a differance in ppt needs.

LA-1341

"Docket ID Number 0584-AD77, WIC Food Packages Rule,"From: Knapp, Rebecca
[RKnapp@spokanecounty.org]
Sent: Thursday, November 02, 2006 8:48 PM
To: WICHQ-SFPD
Subject: "Docket ID Number 0584-AD77, WIC Food Packages Rule,"

I am the program manager for the Spokane Regional Health District WIC program in Spokane, Washington. We have six sites and our caseload is 10,800 clients. I am also a Registered Dietitian. I have several ideas about the proposed food package changes that I wish to share!

I strongly support the addition of fruits and vegetables to the children and women's' food packages. I hope that in developing the system to get fruits and vegetables into the food delivery system, we allow enough time to implement this on the state level.

I also do not want fruits and vegetables in the food package to negatively impact the WIC Farmers' Market Program. Would it be possible to have the WIC fruits and vegetables on a separate food instrument, and have it used in either Farmers' Markets or Supermarkets? That way, during the months the market is operating, clients could spend the fruit and vegetable instrument at either the market or the supermarket, and other months they could use it at the store. It would be nice if this complements the existing Farmers' Market program, not replace it!

I also think baby foods rather than juice between 6-12 months is great.

I definitely believe that white potatoes should be included. They are an inexpensive, healthful, readily available vegetable that is popular and well-known. We want to encourage WIC families to eat potatoes in a form other than french fries, and the first step is for them to have potatoes readily available. Keep white potatoes as an option!!

I oppose the idea that soy products will require a physician's signature. I think this will cause WIC to loose respect in the medical community. The choice to give soy products should be made by the WIC staff in consultation with the client about individual preferences. It is not a medical decision, and having the medical community involved will be more burdensome for them and for the already stretched WIC staff.

I am very glad that the USDA is looking at implementing changes to the WIC Food Package. It's about time!

Becky Knapp
mailto:rknapp@spokanecounty.org
WIC Program Manager
Spokane Regional Health District

1101 W College Avenue
Spokane WA 99201-2095
509 324-1633
509 324-1453 fax
www.srhd.org

Always working for a safer and healthier community

From: Lovan, Tana [tlovan@ci.springfield.mo.us]
Sent: Thursday, November 02, 2006 2:25 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77 WIC Food Packages Rule

I have been working in local WIC agencies for the past twenty seven years (West Plains MO, four years and Springfield, MO, twenty-three years), first as a nutritionist and now for the past seventeen years as program coordinator. I have seen many changes that have improved WIC services through the years, but I strongly believe the proposed changes in the food packages will have the greatest positive effect on families that any of us have ever seen.

We will be able to provide a food package that complements the education component of the WIC program and the 2005 Dietary Guidelines for Americans while being culturally sensitive. This change, I feel, will have a beneficial outcome in improved nutrition standards for our families.

I strongly encourage acceptance and implementation of the WIC Food Package Rule, Docket ID Number 0584-AD77. Thank you.

Tana Lovan, BS
WIC Program Coordinator
290 E. Central
Springfield, MO 65802

Phone: 417-864-1082
Fax: 417-864-1854
E-mail: tlovan@ci.springfield.mo.us

"Helping people live longer, healthier, happier lives."

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 11:14 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Jill Meltzer
EMAIL: Jill.Meltzer@scgnet.us
CITY: Liberty
STATE: New York
ORGANIZATION: Sullivan County WIC Program - Local Agency 241
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 11:14:19 AM

COMMENTS:

I support that more funds are needed to staff programs in order to support mothers during the first at least 40 days of breastfeeding. I support the idea the giving formula to new breastfeeding mothers undermines their confidence and milk supply, however I strongly feel that the WIC Program should be able to using professional discretion provide some mothers with one or two cans of powdered formula during the first month when a special circumstance indicates it. My concern is that more women will chose bottle feeding over breastfeeding if the choice is breastfeeding and no formula for the first month. Some women may still breastfeed in the first month and say they are not in order to get a full formula package, but I feel sending them home with the full formula package will undermine their breastfeeding and milk supply even more than if they go home with only one or two cans. I strongly support the delaying of providing complementary food for infants until 6 months. I support giving a lower amount of formula in accordance with the needs of an infant based on age and weight. I support the addition of baby fruits and vegetables. I would add though that the vouchers indicate how many jars and how many jars of vegetables are allowed to avoid the purchase of all fruit by the participant. The addition of baby meats leads me to question why there is not a substitute containing iron and zinc for those women who do want their child eating meat or chicken (vegetarian), vegan such as Seventh Day Adventists, certain Indian religions and other cultures, people who have dietary laws such as Muslims and those who keep Kosher. All these cultures could not accept the baby meats, yet there is no substitute proposed for them. I strongly support the removal of whole milk for all clients over 2 years old. I support the allowance of fortified soy beverages and tofu as a milk substitute as well as the reduction of cheese for women and limited amounts for children. I support the addition of whole grain breads, tortillas, bul

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 11:04 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Jennifer Hopkins
EMAIL: jennifh@state.ut.us
CITY: American Fork
STATE: UT
ORGANIZATION: Utah County WIC
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 11:03:51 AM

COMMENTS:

- * Need a soy milk for children and adults
- * Less juice to provide only the recommended amount for children
- * Voucher for fresh fruits and vegetables for children and women (preg./postpartum)
- * Other alternatives to cereal for a whole grain option, i.e. bread, etc.
- * Option to purchase canned beans for easier use
- * Option to purchase other dairy products other than cheese, i.e. yogurt, etc.
- * I agree with the IOM recommendations with breastfeeding mothers and the importance of using incentives to focus on breastfeeding such as the mother's food package.
- * Instead of juice for infants give some jar foods starting at 6 months.
- * Jar meats for exclusively breast fed infants at 6-9 months

From: WebMaster@fns.usda.gov
Sent: Thursday, November 02, 2006 8:40 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Lynne Pasquale
EMAIL: lamp73@netscape.com
CITY: Watertown
STATE: New York
ORGANIZATION: North Country Children's Clinic
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 02, 2006
Time: 08:39:32 PM

COMMENTS:

As a WIC nutritionist, I get comments about the food packages everyday. We have many clients requesting soy milk for their 1-yr olds that have been on soy-based formula. Since the soy milk is not available, some physicians write orders for soy formula after age 1. This is a very costly solution in comparison to buying soy milk. I have also see a large increase in women who are lactose intolerant requesting soy milk for themselves. In my duties as a breastfeeding counselor, some women have had to omit daury from their diets to continue breastfeeding an infant that is lactose intolerant, soy milk would be great for them, too.

NYSWIC piloted a program which gave checks for fresh, frozen or canned fruits and vegetables. These checks were highly favored and many clients are still asking if they can get still them or when they will be "brought back". Many of our clients have transportation problems in our rural setting and are able to use these checks easier than the Farmer's Market checks that are provided each summer. I think it would be easier to convince parents to cut back juice consumption if they had the fruit and vegetable checks.

Only offering lower fat milk to clients after age 2 is a GREAT idea. Getting clients to reduce milk fat content is one of my hardest tasks. Considering the poverty level in our area, I think parents would still accept the milk even with lower fat content.

I feel there are many other excellent changes being considered, but these three areas are of the greatest need at present. Thank you for considering my comments.

Lynne Pasquale, RN,CLC

From: WebMaster@fns.usda.gov
Sent: Friday, November 03, 2006 10:56 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: juana hernandez
EMAIL: juanah@clnicasdesalud.org
CITY: calexico
STATE: ca
ORGANIZATION: clinicas de salud del puelbo
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 03, 2006
Time: 10:55:36 AM

COMMENTS:

Proposed rule is much healthier. More nutrition for our Wic Families.

From: WebMaster@fns.usda.gov
Sent: Friday, November 03, 2006 10:46 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Linda Kronheim
EMAIL: lkronheim@fhccp.org
CITY: Carlisle
STATE: PA
ORGANIZATION: Family Health Council of Central PA
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 03, 2006
Time: 10:45:32 AM

COMMENTS:

I support the reduced amounts of juice that are proposed for the new food packages, as well as the whole grain and fruit/veg offerings-I'm glad to see those included! I also would support \$10 vouchers for breastfeeding moms as an additional incentive to nurse. In addition, I support allowing states the option to determine criteria by which infant formula can be provided in the first month.

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

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

From: WebMaster@fns.usda.gov
Sent: Friday, November 03, 2006 1:06 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: SYLVIA NEWELL
EMAIL: SNEWELL@INTERCARE.ORG
CITY: DOWAGIAC
STATE: MI
ORGANIZATION: INTERCARE/WIC
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 03, 2006
Time: 01:06:22 PM

COMMENTS:

I THINK THE PROPOSED CHANGES ARE WONDERFUL AND WELL OVERDUE. MORE VARIETY OF FOOD CHOICES WILL BENEFIT THE HEALTH OF ALL PARTICIPANTS AND CATER TO SPECIAL NEEDS SUCH AS VEGETARIANS AND THOSE WITH MILK ALLERGIES.

MORE CONTROL IS NEEDED ON THE TYPE OF MILK GIVEN AFTER 2 YEARS OF AGE. THE USE OF WHOLE MILK AFTER AGE 2 ABOUNDS AND IS CONTRIBUTING TO THE OBESITY EPIDEMIC WE SEE IN OUR YOUNG CHILDREN AND LACK OF FRUITS AND VEGETABLES AND WHOLE GRAINS. WE RECOMMEND AND ENCOURAGE THIS CHANGE TO LOWER FAT MILK, BUT ULTIMATELY THE PARENTS HAVE THE FREEDOM TO CHOOSE WHOLE MILK BASED ON THE CURRENT VOUCHER PACKAGE PRINTING IN MICHIGAN. THE VOUCHER ONLY SAYS #GALLONS OF MILK. IT DOESN'T SPECIFY TYPE.

THIS NEW PACKAGE WILL BE MORE ALIGNED WITH THE DIETARY GUIDELINES FOR AMERICANS, ENCOURAGING MORE CONSUMPTION OF FRESH FRUITS AND VEGETABLES AND WHOLE GRAINS.; AMD THE USE OF LOW FAT DAIRY PRODUCTS. PLUS RESEARCH ABOUNDS WITH THE HEALTH BENEFITS OF SOY FOODS.

I BELIEVE THE PARTICIPANTS WILL WELCOME THE NEW CHANGES AND BENEFIT GREATLY. AND WE AT WIC WILL BE ACTIVELY INVOLVED IN PROMOTING A HEALTHIER AMERICA. SINCERELY SYLVIA NEWELL RD

From: WebMaster@fns.usda.gov
Sent: Friday, November 03, 2006 3:08 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: mary fleegel
EMAIL: mfleegel
CITY: Rochester
STATE: ny
ORGANIZATION: Anthony Jordan WIC
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 03, 2006
Time: 03:08:10 PM

COMMENTS:

1. Inclusion of fruits and vegetables: The implementation of fruits and vegetable vouchers for clients is a positive way for us to reinforce healthful eating including fruits and veggies daily. I believe that many of our participants lack these in their diets due to high cost of fresh produce. This will help promote/support the idea of eating more healthfully. We also support the inclusion of whole grains to the food package to enforce benefits of eating whole grain breads and other products. We also support the inclusion of canned sardines and salmon in addition to the tuna as well as canned chicken as an option due to the high mercury levels contained in the canned fish. We think the addition of soy products are excellent as many of our clients at our agency would benefit from being able to buy soy milk in place of regular milk. we currently receive a lot of notes from providers stating that the child needs soy milk but currently are only able to give soy formula in place of it. Allowing only fat-reduced milk for women is an excellent idea as we try so hard to promote low fat milk. It is difficult at times to get people to switch to even 2% milk. It appears from seeing participants that a lot of them are buying the whole milk on the checks where there is a choice between the 2% and whole. This would coincide with our counseling in trying to get down to drinking a lower fat milk. The reduction of juice is also supported. Currently WIC gives a lot of juice on food vouchers and we believe that excess juice intake is resulting in many of the overweight children. Canned beans would be a great substitute for the dried. Many participants ask us if canned are allowed on the WIC checks. I think more participants would be likely to take the beans if they were allowed canned variety. We believe that total exclusion of formula during the first month may be detrimental to our breastfeeding rates. We support breastfeeding as optimal means of nutrition for all infants though many of our participants are working/goi

LA-1360

From: WebMaster@fns.usda.gov
Sent: Friday, November 03, 2006 11:11 AM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Janneth Gallardo
EMAIL: juanah@clnicasdesalud.org
CITY: Calexico
STATE: California
ORGANIZATION: Clinicas de Salud del Pueblo
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 03, 2006
Time: 11:10:58 AM

COMMENTS:

All changes are good, because the new packages have been updated in contents of nutrition for all ppts.
Thank you.

LA-1361

From: Sally Callan [callan35@sschc.org]
Sent: Friday, November 03, 2006 5:51 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0504-AD77, WIC Food Package Rules

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Services
USDA

Dear Director Daniels;

I have been a WIC nutritionist for 30 years, and the Breastfeeding Coordinator at our WIC clinic for 15 of those years. I have seen the great successes in breastfeeding rates that come from all the support WIC provides to our communities. Most mothers in this country would have no one to turn to for help without the WIC program. We are very fortunate in serving the families we do. Our initiation of breastfeeding rates have always been above 75%. Our families are mostly Latino, and bring the strength of their traditions to our WIC program. But many of these moms also have to return to work very soon after delivery. They may start as early as 3 weeks, and many work more than 9 hour days. They may be cutting vegetables or cleaning offices. Many work 2nd and 3rd shift. We have a strong peer counselor program in our WIC clinic, and work closely with our local hospital and community health center. But even these efforts cannot help a mom breastfeed for more than the time she is home with her baby after her work day. Our working moms do breastfeed past 6 months, many past a year. Now we are able to support them with a food package and counseling. These are the moms I feel we are abandoning with the new food package rules. They are not choosing formula because they have no desire to fully breastfeed. They would love to be home with their babies and not missing them for 9-12 hours. I would like to encourage WIC to include moms who need more than "partial" formula. As the new rules read, these breastfeeding moms who get the full package of formula have no "category". And when we terminate them at 6 months, I can't help feel that we are sending them the message that not only did they fail their baby and not fully breastfeed, but they failed WIC as well. I urge WIC support for these hard working mothers in the form of a continued reduced food package past 6 months, and continued peer support to help them keep breastfeeding as long as possible.

Thank you for your continued support and guidance. WIC is a strong partner in securing the goals of a breastfeeding friendly society, and I have always been proud to be a part of WIC.

Sincerely,

Sally Callan
16th St. WIC
1337 S. Caesar Chavez Blvd.
Milwaukee WI, 53204

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LA-1362

From: Green Bay Area WIC Program [west02@netnet.net]
Sent: Friday, November 03, 2006 12:52 PM
To: WICHQ-SFPD
Subject: Comments on WIC food package rule changes

Attachments: Hunger task force of milwaukee food package comments.doc

Docket ID Number 0584-AD77
WIC Food Package Rule Changes

NEW Community Clinic WIC Program West side location
Green Bay, WI 54303

We commend the USDA for the release of the proposed food package changes. It is about time to switch gears and have foods more consistent with the dietary guidelines and more culturally sensitive choices.

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

A few other concerns we have are the following points:

a.. We feel that giving 64 jars of baby food is too much for infants especially past 9 months. Many 9 month olds are already eating table foods and would not go through so many jarred foods. Wouldn't it be better to give vouchers to buy fresh fruits and vegetables and teach families how to either make their own baby food or start introducing table foods when age appropriate. We feel that they don't need the meats in the jars at all because by the time we teach families to introduce protein (around 8 months) they may be able to give finely ground up table meats to their infants. We also worry that if a family received all this baby food up to 11 1/2 months that if their baby wasn't eating these jarred foods, they would try returning them to the store or sell to someone who may have a younger baby eating them.

b.. We strongly support fully breastfeeding, but worry that if we offer no formula in the first month of life it may drastically reduce the breastfeeding initiation rates. Many of our moms may be afraid to try breastfeeding in fear that they wouldn't get any formula if they weren't able to continue. They may not try at all. We fear they may say that they are not breastfeeding, but really are just to keep the option of formula available. Statistics would then not be accurate.

c.. We have a concern with the whole milk only for one year olds. We believe milk type for one year olds should be assessed on a case to case basis by our health professionals. If we see a overweight one year old, we feel if they are eating other fat sources in their diet that there is no reason why they have to drink whole milk. There is no magic in the fat from milk that truly helps them develop. Wouldn't 2% be enough fat for them? Some families that we see report that their kids do not tolerate the high fat milks and use a lower fat option. Wouldn't we rather see kids drinking some milk, even if it's low fat to get their calcium and vitamin D for absorption of calcium than no milk if the family doesn't want to use whole milk?

~~d.. We are in agreement of whole grains, but worry that some cultures will still not use these products. For example, a Hmong family may not be willing to try brown rice in exchange for their white rice. We also worry about the Asian stores stocking the whole grain products and being educated on this. We also feel a whole grain pasta would be a nice addition to the whole grain items and may be used more often than the rice.~~

e.. We also worry about how we will monitor the grocery vendors and continue to keep the cashiers educated on such a wide variety of foods purchased with their WIC checks.

Thank you for taking the time to read our comments.

The NEW Community Clinic WIC Program West Side Nutrition Staff

ATTACHMENT

Docket ID Number 0584-AD77
WIC Food Packages Rule

Hunger Task Force, Milwaukee, Wisconsin
October 26, 2006

Hunger Task Force, Wisconsin's leading anti-hunger advocacy organization, applauds the proposed changes to the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) food package published in the Federal Register on August 7, 2006. The new package, long overdue and incorporating over 25 years of growth in medical and scientific knowledge, is in line with the 2005 Dietary Guidelines for Americans and the current infant feeding practice guidelines of the American Academy of Pediatrics. Moreover, the Institute of Medicine (IOM) places the new recommendations well within scientifically established nutrition requirements for WIC populations, both for nutrients that are shown to be inadequate in the diet and for nutrients that currently place participants at risk for excessive intake.

Hunger Task Force supports the majority of the food package recommendations, but it has some concerns about the effect of the new breastfeeding requirements on the food security of 1) mothers who can only breastfeed their infants one or two times per day (because they work or attend school) and 2) partially breastfed infants whose food packages are reduced because of circumstances over which they have no control. Overall, Hunger Task Force advocates for the following in regard to the new WIC food package:

1.) The addition of foods that support current nutritional science and that provide participants choice and culturally sensitive options:

* fruits and vegetables vouchers for both women and children

We do, however, urge the USDA to work with Congress to increase the voucher amounts from \$8 for WIC mothers and \$6 for children to the amounts proposed by the Institute of Medicine's (IOM) Report, \$10 for WIC mothers and \$8 for children.

* baby foods, including meats, fruits and vegetables for all infants 6-11 months of age

* alternatives to milk, including calcium-set tofu, and calcium and vitamin fortified soy beverage

However, we urge the levels of 6.25 grams of protein and 250 milligrams of potassium per 8 ounce serving be adopted as the minimum standard for

calcium-fortified soy-based beverages, in line with what is currently available on the market.

We also urge waiver of the medical documentation requirement for children to receive soy beverages.

- * canned or dried legumes and canned beans or peas as an alternative to legumes

- * additional canned fish choices (salmon, sardines)

- * whole wheat bread or other whole grain options

2.) Reductions in the amounts of some food based on current nutritional science and concern over the alarming growth in childhood obesity:

- * the quantity of eggs

- * milk and the fat content of milk for children and women

- * cheese

- * juice for children and women

3.) We do not support the recommendation to pilot test the food package for partially breastfeeding women, seeing this as an unnecessary postponement in implementation that may lead women to elect to formula-feed their infant. We believe the food package should be implemented without this delay.

4.) We support, in principle, the initiative to encourage breastfeeding for the first six months and continued breastfeeding, with appropriate complementary foods, until the child's first birthday. However, we believe that denying a food package to mothers six-month post partum who request more than half the amount of formula allowed for a fully formula-fed infant and providing decreased food benefits to infants who are not fully breastfed is not a viable incentive for achieving this goal. Life situations facing low-income mothers may explain much of the lag of WIC mothers in progress toward meeting the breastfeeding objectives of Healthy People 2010, not the motivation of the mother.

We request the USDA to give consideration to the economic work realities of low-income women. Work requirements make breastfeeding difficult, if not impossible. In this case, the new rules, designed to support and encourage breastfeeding may instead provide a barrier to low-income working women who desire to breastfeed their infants at least part of the time. Data released by the National Women's Law Center reveal that:

- * Nearly 2/3 of women with children under age 6 are in the labor force, and 2/3 of those women are working full time.

- * The Family and Medical Leave Act allows a worker to take leave for up to 12 weeks for the birth or adoption of a child, but it doesn't require paid leave and doesn't apply to employers with fewer than 50 employees.

- * Three out of four single mothers are in the workforce and three-quarters of that group work full-time.

- * Over one-third (36 percent) of single-mothers are poor. The percentage of African-American and Hispanic single-mother families living in poverty is even higher (42 percent and 45 percent, respectively).

- * Two-thirds of workers over age 16 who work at or below the minimum wage are women. The buying power of the federal minimum wage (\$5.15/hr) is at its lowest level in 51 years.

* For a woman supporting herself and two children, living on the minimum wage puts her family 20 percent below the poverty level.

Both TANF legislation and The Family and Medical Leave Act work against the goal of full breastfeeding on the part of low-income mothers. Low wage jobs do not provide places to breastfeed and do not provide workers time off to breastfeed. Until, or unless organizations and businesses accommodate women on the job, full breastfeeding is not a realistic goal.

Furthermore, the Centers for Disease Control and Prevention report that when teens give birth, their future prospects decline. Teen mothers are less likely to complete high school and are more likely to live in poverty than other teens. (www.cdc.gov/reproductivehealth/AdolescentReporHealth/index.htm.) The proposed WIC food package may put teen mothers in a situation of making a choice between attending school and only breastfeeding once or twice a day, and not attending school so that they can fully breastfeed.

The provision of the new food package that drops women from WIC for breastfeeding when they request more than half the amount of formula allowed for a fully formula-fed infant places these women at risk. The incidence of food insecurity in the United States has increased in the last five years to 11.9 percent (2004). One third of female headed households with children under 18 report being food insecure.

A study in 2002 of the Wisconsin WIC population identified that:

- * 44 percent of WIC families surveyed were identified as food insecure
- * 19 percent of WIC families surveyed were identified as food insecure with hunger
- * 45 percent indicated that the food they bought did not last and they did not have money to buy more food
- * 42 percent indicated they could not afford to eat balanced meals

In addition, research now indicates that the prevalence of obesity among women increases as food insecurity increases (Townsend, Peerson, Bove, J Nutr 2001;131:1738-1745). Increased obesity places food insecure women at greater medical risk.

The proposal to deny a WIC food package for women unable to breastfeed at least half the time, places these women in greater risk of food insecurity and runs counter to the overall goal of the WIC program to safeguard the health of low-income women who are at nutritional risk. It also runs counter to the original intent of the WIC regulation at Sec. 246.2 that recognizes the benefit to be gained by the practice of feeding a mother's breast milk to her infant(s) on the average of at least once per day. That definition recognizes that any breastfeeding, even if only on an average of once a day, provides some immunological and nutritional benefits that would otherwise not be provided to an infant. We see the denial of a food package to women who can only breastfeed their infants one or two times a day as a step backwards for the WIC program.

5.) Likewise, providing less nutritional assistance in the form of fruits, vegetables and meats for the non-breastfed and partially breastfed infant between the ages of 6 and 11 months jeopardizes the nutritional health of an infant for a breastfeeding decision on the

part of the mother that may be determined solely by the mother's employment demands.

In adoption of the new food package, consideration must be given to the reality that the new package may represent a choice between full breastfeeding for a few and no breastfeeding for many. Support of some breastfeeding, even if it is only in the morning before work and once again in the evening may be preferable to cutting a women off completely from WIC support, and decreasing greatly the support provided her infant if economic necessity leads to breastfeeding practice that does not measure up to the standard set by the new regulation.

6.) Finally, we support options that allow state flexibility in the administration of the program:

- * an 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
- * discretion to determine the dollar denomination of the fruit and vegetable cash-value vouchers
- * discretion to determine the minimum vendor stocking requirements for fruits and vegetables
- * flexibility to promote produce selections that are locally accessible, culturally appropriate, affordable, and practical for various household situations
- * the ability to utilize existing Farmers' Market Nutrition Program vendor certification and coupon redemption procedures for authorizing Farmers' Markets to participate in the WIC fruit and vegetable cash-value voucher program
- * the ability to propose food substitutions to keep pace with rapid changes in the food industry, science, demographics and other factors in today's environment

Hunger Task Force thanks the USDA for proposing these long awaited reforms. We urge timely passage of these regulations by the spring of 2007 in the interest of the nutritional needs of our nation's most vulnerable women, infants and children. These regulations, with the exceptions mentioned above, represent a major policy initiative to improve food security, address obesity and help low-income families to make healthier food choices.

From: WebMaster@fns.usda.gov
Sent: Friday, November 03, 2006 6:15 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Blanca Rebaza
EMAIL: brebaza@hrhc.org
CITY: Poughkeepsie
STATE: New York
ORGANIZATION: Hudson River HealthCare WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 03, 2006
Time: 06:15:09 PM

COMMENTS:

Iam in favor of the new food package rules.with the exception of the reduced formula amounts for partially breastfed infants.. The addition of fruits, vegetables, whole grains, and baby foods are welcome by our participants.

From: WebMaster@fns.usda.gov
Sent: Friday, November 03, 2006 4:01 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Karen Krebs RD LD CLC
EMAIL: krebsies@netzero.net
CITY: Shelby
STATE: Ohio
ORGANIZATION:
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 03, 2006
Time: 04:01:11 PM

COMMENTS:

I am a dietitian working with the WIC Program in Ohio. I would like to submit the following comments on the proposed food package changes.

- 1) Children less than 24 months should have the option of 2% or whole milk without medical documentation. It is very difficult to have a physician to respond to a special formula request, the addition of the change would be difficult for the clients and not at all helpful to the well being of our general population.
2. Women or all categories and children should have the option to request soy beverages. products without medical documentation per the IOM Recommendations. There are some individuals following a vegetarian diet who would be very grateful if this is possible for them. Medical documentation will make this option difficult at best for our clients to obtain.
3. The reduction in eggs is troubling for me. In some cases I see eggs as the only meat options in a child's or a women's diet. They are easily obtained with their WIC vouchers and can be used in a variety of ways. The recommendations of 3 egg yolks per week is valid, but we must also consider this population has limited: resources, ability to obtain food stamps, and other organization able to supplement their food dollars to purchase meats.
4. The idea of being cost neutral seems a difficult challenge to overcome. I do not see any need for the addition of tuna in pouches. The cost of this product is way above the cost of the same product in a can. If a participant is allowed to purchase tuna in a pouch then i do not see how they could not also be allowed to purchase alternate canned meats like white chicken.

5. ~~The additional of whole grain cereals may be somewhat limited to the individuals who~~ have multiple food allergies including wheat and or corn. What cereals will they be allowed to purchase?

6. Breastfeeding infants should have the option of receiving one can of formula for their first month. If formula is not to be provided to a breastfeed infant in the first month to encourage exclusive breastfeeding, then I feel all infants should be given the same food package, nothing. This will help our clients to become more self sufficient, learn to plan for upcoming events and it may even force more women to try to breastfeed since they will not have the funds to purchase formula. Many mothers just need the comfort of knowing the can of formula is their even though they may NEVER need it.

7. The idea of providing Baby Food to infants should be removed from the changes. We encounter to many children being offered inappropriate foods at inappropriate times. This will only add to this situation by providing strained foods to children who may be developmentally beyond the need for strained food. This will hinder their continuing need for advancement in the area of food.

Thank you for taking to time and effort to make a needed change to the WIC food system, enhancing the lives of millions of families today and tomorrow.

Karen Krebs RD LD CLC

LA-1365

From: Savage, Karen [KSavage@leavenworthcounty.org]
Sent: Friday, November 03, 2006 12:14 PM
To: WICHQ-SFPD
Subject: Docket ID #0584-Ad77 WIC Food Packages Rule

I support the stronger incentives for continued breastfeeding by providing less formula to partially breast fed babies and providing additional types of foods for breastfeeding mothers and infants.

I support the decrease in the amount of juice provided to children.

I support the offering of produce to mothers and children.

Karen Savage RD LD
WIC
Leavenworth County Health Dept
Leavenworth, KS

LA-1366

From: Dina McClaran [mcclad@lpha.dhss.mo.gov]
Sent: Friday, November 03, 2006 4:21 PM
To: WICHQ-SFPD
Subject: Sullivan County WIC

To Whom It May Concern:

The WIC staff here would like to speak for our 279 clients with a vote in favor of the fruits, vegetables and whole grains. The timing of this has happened at a time when we did not have wic last week and will not have it again until November 7 so getting their comments and signatures has not been possible.

Thank you

Connie Michael RN, Administrator
Joann Anderson RN, WIC
Maria Calderon, WIC Translator
Dina McClaran, WIC Clerk

LA-1368

November 3, 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"

From: North Central PA Regional WIC Program

Dear Ms. Daniels:

The North Central Regional PA WIC Program supports the changes in the proposed rule published in the Federal Register on August 7, 2006, governing the WIC Food Package changes. These proposed changes are consistent with nutrition education to improve the overall health of WIC's population. However, we would like to offer the following comments.

We recommend that fully breastfeeding, partially breastfeeding and fully formula feeding women's food package changes be implemented at the same time and that pilot testing packages for partially breastfeeding women be eliminated.

We agree that all states be required to provide "no" formula to a breastfeeding infant the first month of life. We do not feel that this will decrease incidence or duration of breastfeeding but will encourage the mother to offer the breast more frequently the first month of life and will help build milk supply.

We also urge that the dollar amount of "cash-value" vouchers to purchase fruits and vegetables be increased to \$10.00 for exclusively breastfeeding women. This will provide increased incentive for breastfeeding.

We encourage partially breastfeeding infants to be allowed up to 6 cans of powdered formula per month. A woman can be truly breastfeeding and offer 20 ounces of supplemental formula per day.

We disagree with calculating monthly formula packages on reconstituted yield as some special formulas have greater caloric value per liquid ounce and do not require as many fluid ounces per 24 hours.

We would like to keep formula levels between birth and six months at the current levels and have them decrease after 6 months of age. Increasing formulas levels between birth and 6 months and then decreasing after 6 months will be confusing to many clients and will require extra attention and time changing food packages. Staff is already overwhelmed paying attention to many details, they do not need to spend extra time making changes that are not necessary.

We agree that low iron formulas should not be provided. "Finally" after 24 years with WIC it is seldom ordered by the doctor. We assume that special formulas such as Similac PM 60/40 will be excluded from this rule.

We totally agree with jar baby meats for exclusively breastfed infants.

We totally agree with no complimentary foods until 6 months, early introduction of solids continues to be a problem we face each day in the WIC clinic; if we do not provide it until later maybe more mothers will wait another month or two before purchasing cereal.

We do not see the point in offering low fat peanut butter since there would be no caloric savings.

We see a problem at the register with the purchase of fresh fruits and veggies. For example, apples get moved from bin to bin frequently so the price posted may not necessarily be the price of the apple that you have in your hand assuming the apple you wanted to purchase was moved by another customer.

We are very happy with the concept of adding whole grain breads, however this issue can be a real problem for the client depending on label clarity.

The conditions qualifying clients for ready to feed formula needs to be modified to include the statement "RTU formula is not for infants whose caregiver states, "my child won't drink powder or concentrated formula."

Staff was divided on the issue of restricting women and children over the age of 2, to the purchase of low or no fat milk. This creates a problem for the mom who has a 1 year old and 2 year old on the program. When she redeems the FI's for the 1 year old, the family will in all probability, drink whole milk that week, and the week that she redeems the FI's for the 2 year old the family will be drinking low fat or skim milk. Regardless of this dilemma, we feel as a group of nutrition professionals that we must move to reduced milk fat for all women and children age two and older. We must put into practice what we teach. This will certainly facilitate healthy food choices.

We disagree with reducing the amount of eggs provided each month. Eggs are a low cost high quality protein and an excellent source of iron. Two dozen eggs per month for pregnant and breastfeeding women is not a lot. More eggs encourage more home cooking.

----- We thank the USDA for allowing Local WIC Agencies access to the proposed rule and -----
for giving us the opportunity to submit our comments and suggestions. We look forward
to the final release.

From: quinn [quinn@norwescap.org]
Sent: Friday, November 03, 2006 4:12 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

The following are my comments regarding the proposed rule governing the WIC Food Packages published in the Federal Register on August 7, 2006.

It is of utmost importance that the Nutrition message that we deliver during educational contacts with participants be reflected in the food package that they receive. Currently this is not the case considering the absence of fruits and vegetables in the package and the quantities of whole milk and cheese, infant juice and low fiber cereals that are allowable. The proposed changes would be a huge step towards this end. What better way to educate participants about the components of a healthy diet than to show them by example with the foods they are allowed to purchase with their WIC checks.

I support and applaud the following proposed changes as they emulate current nutritional science as well as our nutrition message to clients:

Vouchers for fruits and vegetables.

The elimination of all infant juice and the reduction in the amount of juice for women and children.

The delay of complimentary foods for infants until 6 months.

Jarred baby food for all infants and jarred meats for breastfed infants.

Only whole milk for children age 12 - 23 months and 2% milk or less for those over 24 months.

The reduction of the amount of milk allowed for women and children.

Limits on the amounts of cheese allowed in the package.

The addition of Tofu and soy milk.

Allowing canned beans.

Whole grain cereals and whole wheat bread.

The addition of canned salmon and sardines (although the popularity of these foods is questionable.)

Although I completely agree that breastfed infants should not receive any formula during the first month, reality dictates a closer look at this proposal. Unfortunately many infants whose mothers intended to breastfeed are given formula in the hospital before discharge. Despite the prenatal messages that WIC gives these mothers, many go home from the hospital thinking their infants need formula as well as breast milk. They assume if it was given in the hospital than the baby must need it. It would be inaccurate to categorize these infants as fully formula fed. Until hospital feeding practices change it would be counterproductive to eliminate the partially breastfed food package for newborns. I do agree however that partially breastfed infants should only receive powdered formula.

Finally, I believe that one year is not enough time to give state agencies to implement such a completely revamped food package. The administrative tasks involved are massive: deciding on a state approved food list, changing data systems, changing food instruments, training vendors, training WIC staff and training WIC participants. I feel that a two year implementation date would be more realistic to accomplish all of this.

In closing I would like to thank USDA for taking this huge step towards improving the nutrition and health of some of our most vulnerable citizens.

Nancy Quinn
Director
NORWESCAP WIC Program
504 South Main Street
Phillipsburg, NJ 08865
(908)454-5011

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From: WebMaster@fns.usda.gov
Sent: Friday, November 03, 2006 2:48 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Mary Dell'Osso, M.S., R.D.
EMAIL: mdelloso@wowway.com
CITY: Rochester
STATE: Michigan
ORGANIZATION: Oakland County Health Division - WIC Program
CATEGORY: WICLocalAgency
OtherCategory:
Date: November 03, 2006
Time: 02:47:39 PM

COMMENTS:

1. Increased variety of foods allowed is great.
2. Inclusion of baby foods and reduction of formula are especially good - our moms are too dependent on formula and often do not recognize the importance of introducing foods.
3. A reduction in formula also reinforces the idea that WIC is supplemental - as it is now, we provide nearly enough and our moms always seem alarmed when they run out.
4. I am concerned about the potential for increased confusion at the grocery store. I am afraid that increased frustration on the part of store clerks will translate into increased difficulty for our clients when using the coupons.
5. I am also concerned that the increased variety of foods will result in WIC staff having to spend more time explaining the details of what can be purchased and leave us with even less time to spend educating our clients.
6. The inclusion of soy milk is a wonderful idea. However, it needs to be handled in a way that causes minimal difficulty for the WIC staff. The requirement of a doctor's prescription for some, but not all, clients is something that a dietitian can easily understand, but more difficult to explain to our moms. Furthermore, any time a prescription is required, there is a hassle on the part of the moms and the staff over the appropriateness of the diagnosis, the duration of the prescription, etc., resulting in extra trips to the doctor and back to the WIC office or precious time spent contacting the doctor and waiting for returned calls or faxes.
7. Lastly, requiring moms to declare themselves either fully breastfeeding or fully formula feeding for the first month after birth is a great way to discourage moms from breastfeeding. Rarely in our clinic do we have the time to provide the intensive support necessary to insure moms get off to a good start, and few of our moms are confident in

their breastfeeding skills to go home with no formula at all. Our moms value the formula more than they will ever value a food package for themselves. Furthermore, this requirement would result in additional trips to the WIC clinic at the one month mark to make the necessary changes. Staff at most WIC clinics do not have spare time for the additional appointments that would result.

Thank you for your attention. I look forward to the upcoming changes.

Mary Dell'Osso, M.S., R.D.

email 11-03-06 from Lord, Dana [danalor@co.clackamas.or.us]

November 3, 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:

Oregon WIC Coordinators Association strongly and enthusiastically supports the USDA issued proposed rule governing the WIC Food Packages published in the Federal Register on August 7, 2006.

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

- *We do not support* the recommendation to pilot test the food package for the partially breastfeeding woman. With a delay in implementation of this package, we believe that many women will simply choose to formula feed. We recommend that the fully breastfeeding, partially breastfeeding and fully formula feeding woman's food package changes be implemented concurrently.
- We would also suggest that States be given the option to provide the breastfeeding infant, in the first month, with 1). no formula, or 2). one can of powdered formula as recommended in the IOM Report. States would incorporate their option into their existing breastfeeding policies and procedures.
- We believe small amounts of formula can support breastfeeding during the early months, especially when used in conjunction with support from a lactation educator.

The proposed rule for food package III provides 624 fl oz.

- We recommend that the amount of formula for this age group remain at 806 fl oz. We are very concerned that infants receiving medical formula would be at great risk, because of the economic impact to their families.

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

- We recommend that the State WIC Programs retain flexibility to offer up to \$6 voucher as an alternative the jar baby food for the infant 6-11 months of age.

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.

- Currently, there are no calcium-fortified soy-based beverages on the market that meet the proposed protein and potassium standards. Accordingly, we urge levels of 6.25 grams of protein and 250 milligrams of potassium per 8 ounce serving as alternative minimum standards in order for WIC women and children to be able to include soy.
- We also urge that women and children be able to receive soy products without the requirement of medical documentation.

The proposed rule to include whole grain bread and other grains for all children and pregnant and breastfeeding women is consistent with the *2005 Dietary Guidelines for Americans* which recommend that refined grains be replaced with whole grains.

- In order to accommodate the medical needs of certain participants, we support the IOM recommendation to allow States to make substitutions for “wheat-free” cereals based on a medical prescription and urge the Department to include such a provision in the final rule.
- We recommend that white rice, tortillas and other culturally appropriate grain products be available.

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

Sincerely,

Jean Farmer, RD
On behalf of the Oregon WIC Coordinator Association

From: Kathlene Ercoli [kercoli@co.riverside.ca.us]
Sent: Friday, November 03, 2006 2:46 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

RE: Docket ID Number 084-AD77, WIC Food Packages Rule

I am delighted with most of the proposed changes in the WIC food package. I believe it is very helpful for diabetic participants in that it will offer them more options. It also addresses the needs of vegetarians which is helpful and valuable. My biggest wish is that the \$ amount for the fruits and vegetables be increased. Our participants are very excited that fruits and vegetables will be available to them on their vouchures. I wouldn't mind seeing the juice deleted entirely exchange for more fruits and veggies.

Sincerely,
Kathlene Ercoli, RD
Senior Nutritionist
Palm Springs WIC
Riverside County

LA-1374

From: Michele Ballard [MBallard@co.riverside.ca.us]
Sent: Friday, November 03, 2006 7:00 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

I am writing in regards to the change of the WIC food package. I am a registered dietitian for the WIC program in Riverside County, California. I like the new package however feel that the dollar amount for the fruits and vegetables is too low.

Riverisde County
Department of Public Health
Moreno Valley WIC
Moreno Valley, Ca

LA-1377

From: Dwyer, Karen [kdwyer@mt.gov]
Sent: Friday, November 03, 2006 2:16 PM
To: WICHQ-SFPD
Subject: Food Package Changes

Committee Members:

Keep in mind that some WIC parents who currently run out of formula will feed their infants any type of milk on hand, including powdered, until they receive more formula checks from WIC. One participant was giving her daughter non-dairy creamer mixed into water, so that the liquid would look white and the baby wouldn't know the difference (extreme case.)

Is our goal to nourish the child? Maybe we can save money in a different manner.

Karen Dwyer
Sanders County WIC/Public Health
PO Box 519
Thompson Falls, MT 59873
(406)827-6931

From: Lela Silverstein [lsilverstein@sehc.org]
Sent: Friday, November 03, 2006 3:15 PM
To: WICHQ-SFPD
Subject: Docket ID #0584-AD77 WIC Food Package Rule

Ladies and Gentlemen,

I am writing to support Docket ID Number 0584-AD77, WIC Food Package Rule, which if passed, would greatly help our patients in their abilities to eat well and stay healthier.

I do not support the recommendation to pilot test the food package for the partially breastfeeding woman. I recommend that the fully breastfeeding, partially breast feeding and fully formula feeding woman's food package changes be implemented concurrently.

I urge that the dollar amount for fruits and vegetables provided to the fully breastfeeding woman be increased to \$10, matching the IOM recommendation, for at least the first 6 month postpartum period. This would provide an even stronger incentive to breastfeed for a longer period of time.

I suggest that States be given the option to provide the breastfeeding infant in the first month with 1. no formula or 2. one can of powdered formula as recommended in the IOM report.

State agencies will also require additional resources to provide enhanced breastfeeding support, peer counseling services and pumps to participants in order to ensure that WIC mothers feel comfortable foregoing formula within the first month and thereafter, to help ensure breastfeeding success and optimal nutrition for their infants. WIC is the only national program that provides this level of breastfeeding education and support to the WIC population, and must ensure that these changes work to promote breastfeeding and not conversely, work against women's efforts, because they are afraid of losing some of their food package.

States should have the option to tailor the food packages to best suit the participant's needs.

Sincerely,

Lela Silverstein, MS, LDN
Senior Nutritionist
South End Community Health Center
1601 Washington Street
Boston, MA > 02118
617-425-2000 X2234