



November 1, 2006

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

Re: Special Supplemental Nutrition Program for Women, Infants and Children (WIC):
Revisions in the WIC Food Packages; Proposed Rule

7 CFR Part 246
RIN 0584-AD77

As educators, the members of the Society for Nutrition Education (SNE) understand the importance of striving for consistency between our educational messages and the food that is provided by the WIC food package. Therefore we laud the United States Department of Agriculture (USDA) for taking an important step forward for the health of the WIC population in the proposed changes to the WIC food package. These long-awaited changes include the much needed addition of fruits, vegetables and whole grains to the WIC package and produce a WIC food package that is more consistent with dietary recommendations in the Dietary Guidelines for Americans and more sensitive to the needs and preferences of WIC's culturally diverse population.

While changes proposed by USDA are an improvement, they fall short of the recommendations outlined by the Institute of Medicine (IOM) in their report on the WIC Food package. USDA's application of the cost-neutrality principle is forcing cuts that reduce or eliminate some key IOM recommendations including the following:

- The proposal falls short of the monthly allotment amount for fruit and vegetables that IOM determined was necessary for a nutritionally sound WIC food package. These recommendations were based on compelling research showing low intakes of fruits and vegetables for young children and adult women, as well as evidence that increased fruit and vegetable consumption promotes healthy body weight. SNE recommends that USDA increase the monthly voucher to \$8 for children and \$10 for adults, to be consistent with the evidenced-based IOM recommendations.
- Another key IOM recommendation, the option of offering yogurt as a calcium-rich food, is not included in USDA's proposed WIC food package. SNE recommends that USDA include yogurt in the WIC food package to accommodate cultural preferences and increase the variety of authorized calcium-rich food sources.

- With regard to whole grain products in the food package, SNE recommends that USDA strives to minimize the confusion that is likely to occur if the definition of a whole grain product for WIC is not consistent with advice for consumers on how to “make half your grains whole” in the Dietary Guidelines for Americans and MyPyramid.

Farmers markets are an important source of fresh, locally grown fruits and vegetables for WIC participants through the WIC Farmers Market Nutrition Program (FMNP). SNE recommends that USDA, through the WIC food package regulations, assures that Farmer’s Markets can continue to be a significant source of fresh fruits and vegetables for the WIC population. In order for WIC recipients to most easily use the proposed fruit and vegetable WIC vouchers at farmers’ markets, SNE offers the following recommendations for inclusion in the WIC food package regulations:

- Protect the WIC FMNP from reduction in current funding levels or the establishment of rules, systems, or procedures at the federal or state levels that would adversely affect the operation and effectiveness of the WIC FMNP.
- Require coordination between the proposed WIC fruit and vegetable voucher program and all existing and future federal-state WIC FMNP.
- Specify that farmers and farmers’ markets that are currently authorized under state WIC FMNP procedures be automatically eligible for vendor specification under the new fruit and vegetable voucher program. These WIC FMNP farmer and farmers’ market authorization procedures should also be applied by states in the future vendor specification process.
- Allow farmers and farmers’ markets to participate as seasonal vendors, since most farmers’ markets in the country are unable to operate year round. Similarly, farmers’ markets need to be exempted from the “WIC only” cost containment requirement and not be required to carry a full range of WIC food package products.
- Provide EBT and or voucher systems that have practical applications for farmers and farmers’ market vendors.

Finally, as suggested in the IOM report, we also recommend that steps be taken to work with State and local WIC agencies and authorized retailers to facilitate clients’ use of cash-value vouchers for fruits and vegetables. This may include the following strategies:

- Ensure that adequate signage and tools (e.g. accurate, consumer-friendly scales) are available at retail outlets, for WIC clients to estimate the cost of their fruit and vegetable purchases before proceeding to checkout and readily identify those items located in the produce department that do not qualify.
- Package fruits and vegetables so that costs are easily understood.
- To minimize stigma and maximize efficiency, ensure that systems are in place to allow a client to pay for any excess costs for fruits and vegetables, should the total cost of produce at checkout exceed the value of the vouchers presented.

In summary, the proposed WIC food Package regulations take critically important steps toward a healthier WIC food package. SNE supports the improvements in the package. In addition we urge USDA to make further improvements in WIC package regulations as outlined in this letter.

Thank you for the opportunity to comment on the proposed WIC food package and for your consideration of our recommendations.

Sincerely,

A handwritten signature in black ink that reads "Robin Ann Orr". The signature is written in a cursive style with a large, prominent 'R' at the beginning.

Robin A. Orr, PhD
President
Society for Nutrition Education