



COALITION ON HUMAN NEEDS

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Ms. Patricia N. Daniels
WIC Director, FNS/USDA
3101 Park Center Drive, Room 528
Alexandria, VA 22302
RE: Docket ID Number 0584-AD77

November 6, 2006

Dear Ms. Daniels:

I am writing on behalf of the Coalition on Human Needs (CHN) in support of the U.S. Department of Agriculture's new proposed rule improving the WIC food packages. The Coalition on Human Needs is a national private, nonprofit alliance of religious organizations, service providers, policy experts, labor, civil rights, and other advocates concerned about the federal role in meeting the needs of low-income people. CHN is based in Washington, DC. We believe that mothers, infants, and young children will make nutritional and health gains because USDA's new packages are based on scientific recommendations, including those of the 2005 Institute of Medicine of the National Academies, the Dietary Guidelines, and the American Academy of Pediatrics. The addition of fruits, vegetables, whole grain bread and cereals, corn tortillas, canned beans, and brown rice, with the option of soy milk and tofu, will all contribute to healthier children and mothers. We also support the decision to reduce the amount of fruit juice in the package.

Our support for these changes is based on two main considerations: (1) what is best for the health of low-income children and their mothers; and (2) how to maximize convenience and respect cultural preferences, to increase the likelihood that families are able to make healthy choices. With these criteria in mind, we respectfully suggest there are a few improvements that can be made to the WIC food packages that will further strengthen the proposed rule.

Please increase the fruit and vegetables benefit by \$2 per month for all WIC participants. As you know, the Institute of Medicine (IOM) initially proposed \$8 per month for children and \$10 per month for women, but the proposed rule includes only \$6 and \$8. The health benefits from fruits' and vegetables' nutritive value can only be

achieved if the amount recommended by the IOM is accepted. We urge an inflation adjustment as well, so that the buying power of the benefit does not quickly erode.

Please allow children to receive soy milk without a medical prescription. We are mindful of the fact that cow's milk offers nutritional value that makes it advantageous for many children. Nevertheless, requiring a prescription will be inconvenient for many families, making it less likely that they will be able to provide the best alternative for their lactose-intolerant or allergic children. Three-quarters of African Americans, Native Americans, and Mexican Americans suffer from lactose intolerance, and are disproportionately likely to have incomes low enough to qualify for WIC. Further, 90 percent of Asian Americans are lactose-intolerant. With such widespread prevalence, we believe requiring a prescription is an unnecessary burden.

Please maximize choice of whole grain cereals to address cultural preferences and allergies. We urge you to revisit the proposed cereal standard to move to including whole grain rice (such as puffed rice), corn (such as corn flakes), and bran cereals. More choice of whole grain cereals will allow people with allergies to find healthy alternatives. In addition, it is important to take cultural preferences into account (for example, many of the 2.5 million Latino mothers and children participating in WIC prefer corn cereals), to increase the likelihood that families will take advantage of new healthier foods. We strongly support USDA's retention of the limit on sugar and the iron requirement in cereals.

Please provide both breastfeeding supports and a can of infant formula during the first month for nursing mothers who may require the supplement of formula. We recognize that it is vital for nursing to be well-established in the first weeks after a baby's birth, and support encouragements such as counseling and breast pumps for mothers who wish to breastfeed. Still, it is important to recognize that low-income women, who may have no choice but to return to work rapidly after childbirth, may not have storage facilities in their place of work to allow them to save enough breast milk to make up their infant's whole diet. Even if they use a pump during breaks at work to keep up their ability to produce milk, mothers may not be able to save their milk for their child's use. In such cases, or if the mother is having difficulty producing enough milk, a can of formula would be an essential supplement. The current proposal only provides formula if the mother chooses not to nurse at the outset. With counseling, mothers should be encouraged to breastfeed as much as they are able. But, adhering to our dual criteria of health and convenience, mothers should be able to have formula on hand if it is needed. We believe that this approach will increase the number of mothers who at least partially breastfeed, and it should be implemented as quickly as practicable.

Provisions in the proposed rule to include farmers' markets as WIC vendors will help to make the new fruit and vegetable benefit more accessible. To streamline the process, farmers' markets that already meet the farmers' market or WIC Farmers' Market Nutrition program standards should be eligible as vendors, even if they are not open all year long and do not stock the full WIC package. We also hope that USDA plans and

monitors implementation of the new food packages through advisory councils that include WIC participants and representatives of community-based organizations.

With about half of all infants in the U.S. participating in WIC, we believe that the new nutritional package will be of great benefit, and even more so with the modest improvements listed here. We urge you to release the final rule by the spring of 2007, to allow the benefits to reach mothers, infants, and children as quickly as possible.

Thank you very much for the major improvements included in the proposed WIC food packages, and for the opportunity to provide comments. If you should have any questions, please do not hesitate to contact me at (202) 223-2532 x31, or by email, at dweinstein@chn.org.

Sincerely yours,

A handwritten signature in black ink that reads "Deborah Weinstein". The signature is written in a cursive style with a long, sweeping horizontal line extending to the right.

Deborah Weinstein
Executive Director