



WIC Administration
Benefits, and Certification Branch, Policy Division
Food and Nutrition Service
Attention: P.O. Box 2885
Fairfax, Virginia 22031-0885

February 9, 2023

VIA ELECTRONIC SUBMISSION

Re: FNS-2022-0007

Proposed Rule: Special Supplemental Nutrition Program for Women, Infants, and Children:
Revisions in the Women, Infants, and Children Food Packages

To Whom It May Concern,

Thriving PA is a non-partisan, statewide campaign that seeks to improve the quality of and increase equitable access to a coordinated system of health supports, including access to comprehensive perinatal health services, children's health insurance, nutrition supports and lead screening and abatement. As a part of this work, we focus on promoting access to nutrition and health supports for families across the Commonwealth, and bolstering participation in WIC.

Thank you for the opportunity to comment on the proposed rule, FNS-2022-0007. In reviewing the food packages, we see the National Academies of Sciences, Engineering and Medicine (NASEM) made recommendations that are practical, scientifically reflective, and allow the program to more effectively meet the nutritional and cultural needs of WIC participants. Therefore, we are writing in strong support of the proposed updates to the WIC food packages, and would like to provide supporting evidence regarding the recommendations.

In Pennsylvania, Thriving PA's statewide WIC participant brief illustrated that families are craving many of these proposed food package changes. Statewide, current and former WIC participants highlighted barriers to access such as lack of flexibility in sizing and lack of diversity in the package, both of which the proposed food package aims to address. Participants noted the positive impacts to their families through the increased for Cash Value Benefits (CVB), which were put in place in 2021 in response to the rising food costs as a result of the pandemic. Our support of proposed updates will focus primarily on these issues.

We support USDA's proposal to establish higher values for the Cash Value Benefit (CVB) to reach the target intake for fruits and vegetables.

We strongly support the permanent increase of the Cash Value Benefit to reflect 50% of the *Dietary Guidelines for Americans* (DGA)-recommended fruit and vegetable intake. These steps will improve participant access to healthy WIC choices and provide greater opportunity to introduce WIC children to a balanced diet of nutrient-dense foods. WIC's increased issuance of fruits and vegetables is one of the most substantial investments in nutrition security in recent years. Whole fruits and vegetables were not added in the WIC food packages until 2007, when WIC took a step forward to align with the *Dietary Guidelines for Americans* recommendation that at least half of all fruit intake be whole fruit.¹ With the increased amounts first put in place by Congress in 2021, USDA's proposed rule would take a noteworthy step forward in establishing healthy eating patterns by affirming WIC benefit issuance at 50% of DGA-recommended intake.²

We support USDA's proposals to strengthen whole grain intake and align with cultural eating patterns.

WIC is one of the nation's most successful, cost-effective public health nutrition programs and is rooted in a science-based process. USDA's proposed rule reflects the scientific advice of the NASEM report and the most recent edition of the DGAs, demonstrating an ongoing commitment to build upon the public health advances secured in the 2009 food package review. USDA has listened to WIC families and providers by going further than the NASEM recommendations to offer a broader range of nutritionally appropriate whole grain options that align with cultural eating patterns, including quinoa, wild rice, millet, triticale, amaranth, kamut, sorghum, wheat berries, tortillas with folic acid-fortified corn masa flour, corn meal (including blue), teff, buckwheat, and whole wheat pita, English muffins, bagels, and naan.³ Additional cultural options reflect both traditional diets honored by WIC families, as well as ensuring WIC respects cultural differences in diet choices, allowing the program to serve a broader population of eligible participants.

We also support the package's steps to ensure that WIC approved breakfast cereals meet the same whole grain-rich standards that apply to school nutrition programs and the Child and Adult Care Food Program. Evidence shows that increasing consumption of whole grain cereals can significantly lower diabetes and obesity rates. Last time WIC nutrition standards were upgraded in 2009, requiring half of WIC cereal products to meet whole grain-rich standards, we saw notable gains in health. The WIC food package revisions were

¹ U.S. Department of Agriculture & U.S. Department of Health and Human Services. *Dietary Guidelines for Americans, 2020-2025*, at 32.
https://www.dietaryguidelines.gov/sites/default/files/2021-03/Dietary_Guidelines_for_Americans-2020-2025.pdf.

² Weinfield et al., "Longer Participation in WIC Is Associated with Better Diet Quality in 24-Month-Old Children."

³ "WIC: Revisions in the WIC Food Packages | Food and Nutrition Service."

associated with positive impacts on prevalence of obesity among young children. In a study from 2000 through 2014, obesity rates among 2-to-4-year-old WIC participants were increasing by 0.23 percentage points per year before the 2009 revisions, but obesity rates declined by 0.34 percentage points per year after the revisions.⁴

We support increased flexibility and promotion of participant choice.

USDA puts forth several steps to further improve flexibility and choice among dairy options. USDA would remove the limitation on the quarts of milk that could be substituted, allowing a participant to redeem all potential substitutions: yogurt, cheese, and tofu⁵. USDA's changes to offer a broader range of package and container sizes introduce another degree of flexibility that will make it easier for State WIC agencies to authorize single-serve and multipack yogurt containers, string cheese, and drinkable yogurts. We support the changes to dairy in the proposed rule to ensure that participants have more choice throughout the food package.

USDA's proposed rule again goes beyond the NASEM recommendations to offer far greater flexibility to State WIC agencies in authorizing smaller package sizes than the maximum, across all food categories except for infant formula. This step will not only expand options and introduce more convenient package sizes (such as single-serve or multipack yogurts), but it also empowers WIC shoppers to assume greater responsibility in maximizing their redemptions. Combined with tailored and individualized nutrition education and the emerging support of digital tools like shopping apps, package size flexibility could both reduce barriers in the shopping experience and further invigorate WIC's nutrition education programming.⁶

In the proposed food package, WIC will be better prepared to contribute to the broader public health efforts to curb chronic diet-related conditions and set the stage for healthier outcomes. WIC has a proven track record of public health success that is attributable to this structure: improved pregnancy and birth outcomes,⁷ reduced risk of infant mortality,⁸ improved breastfeeding rates,⁹ increased consumption of under-consumed food groups,¹⁰ higher dietary quality,¹¹ and reduced prevalence of childhood obesity.¹² We believe that the

⁴ Heather Hartline-Grafton, DrPH, RD, "Impact of the Revised WIC Food Packages."

⁵ "WIC: Revisions in the WIC Food Packages | Food and Nutrition Service."

⁶ "WIC: Revisions in the WIC Food Packages | Food and Nutrition Service."

⁷ Finger KR, et al., "Reassessing the Association between WIC and Birth Outcomes Using a Fetuses-at-Risk Approach."

⁸ Soneji and Beltrán-Sánchez, "Association of Special Supplemental Nutrition Program for Women, Infants, and Children With Preterm Birth and Infant Mortality."

⁹ Kline N, et al., "WIC Participant and Program Characteristics: 2020 Final Report."

¹⁰ Whaley et al., "Revised WIC Food Package Improves Diets of WIC Families."

¹¹ Weinfield et al., "Longer Participation in WIC Is Associated with Better Diet Quality in 24-Month-Old Children."

¹² Daep et al., "WIC Food Package Changes: Trends in Childhood Obesity Prevalence."

proposed package will have a positive impact on WIC participation as well as maternal-child health outcomes, not only in Pennsylvania, but nationally.

In conclusion, we support the changes proposed by USDA to improve the WIC food packages and encourage USDA to finalize this rule as quickly as possible so that WIC can issue the new food packages to participants across the country.

Respectfully submitted,

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