



To: WIC Administration Benefits, and Certification Branch, Policy Division, Food and Nutrition Service, USDA  
From: California WIC Association  
Date: February 20, 2023  
Re: Revisions in the Women, Infants and Children Food Packages

On behalf of the Board of Directors and Members of California WIC Association (CWA), I am pleased to share our comments and recommendations on this important review and update of the WIC food packages. Since 1992, CWA has organized California WIC local agencies and allies to educate policymakers about WIC, and also to advocate for funding, expansions, improvements and policy reforms that improve the health and well-being of the WIC families and communities we serve.

The 2009 updates to the WIC food packages supported many of the nutrition and lactation messages provided by WIC staff and were successful in improving health outcomes and addressing nutrition disparities. It was an example of the power of WIC as a public health program. The importance of strengthening and making further improvements to the WIC food packages cannot be overstated. Not only will the upcoming changes impact the nutritional status and health outcomes for millions of vulnerable families, but the changes can drive improvements to overall food manufacturing, marketing and retail grocer environments, thus benefiting millions more. As a public health nutrition program that continues to improve the foods provided to families, WIC makes a major contribution to addressing chronic disease and population health by ensuring healthy foods are available in grocery stores and farmers' markets across the nation.

The current proposal to update the WIC food packages and comments will be critical to the success of the program over many years. Upcoming food package changes could have an impact on lagging participation, now a decades plus problem. The pandemic and formula crisis put the program through unprecedented challenges exposing areas of needed improvement. Most importantly, continued improvements to the food packages, offering foods inclusive of cultural practices and food sensitivities will make WIC a more welcoming program. The recent introduction of technologies is also a consideration in the implementation phase of the new food packages.

CWA thanks the NASEM Committee for the very thorough review and recommendations in 2017 of the WIC food packages and efforts to align with the Dietary Guidelines for Americans. The report is of additional significance in identifying the difficulties in providing the nutrient needs and food security for WIC participants within the constraints of cost-neutrality.

CWA supports the USDA in addressing the limitations of cost-neutrality in providing adequate and appropriate foods in the food packages to ensure the nutritional value of the WIC food prescription. USDA is to be commended for providing the very popular CVB in 2009, and more recently the increase in fruits and vegetables benefits. Since the CVB was introduced WIC participants have expressed an interest in and appreciation for improved access to fruits and

vegetables. Prior to these added benefits, breastfeeding food packages were the only packages to include produce, and only carrots.

CWA recognizes the thoughtful and detailed review of the food package proposals provided by many stakeholders. We especially appreciate the comments and recommendations provided by California Department of Public Health (CDPH) WIC Division staff. We encourage USDA to take time to review the many details and suggestions from CDPH that reflect important considerations of proposed rules from a number of program perspectives.

CWA supports all the comments and suggestions provided by CDPH, with only one exception, the requirement for all cereals to be whole grain. CWA supports the proposal for all cereals to be whole grain. There has been concern about reduced redemption of corn and rice based cereals, especially among families identifying as Hispanic, should the requirement be for cereals to be whole grain. WIC redemption data from Oklahoma, where all cereals are whole grain, showed that cereal redemption by Hispanic families was higher than the redemption rates for non-Hispanic families. In another example, Hispanic and non-Hispanic participants did not have significant differences in correctly identifying whole grain versus refined grain products, including whole grain and refined grain cereals. A number of other studies looked at this food benefit for these concerns. CWA proposes that with focused nutrition education alignment around whole grain cereal choices, redemption by families would not be a concern.

CWA supports the addition of other whole grain options. This improvement not only adds fiber and key nutrients but provides participants the opportunity to prepare recipes inclusive of their cultural practices.

CWA supports the proposed rules to improve access to fruits and vegetables including:

- Maintaining the current redemption values for the cash value benefit.
- Reducing the amount of juice in the pregnant, breastfeeding and child food packages and eliminating juice in the postpartum food package.
- Providing additional cash value benefit for juice as a default, including consideration of high cost of living areas.
- Adding the option of fresh herbs as a benefit.

CWA supports the proposed rules for milk and plant-based beverages including:

- Reducing the amount of milk to align with the DGA.
- Providing lactose-free milk.
- Prohibiting flavored milk.
- Adding plant-based beverages, in addition to soy beverages that meet the nutritional requirements.

CWA supports the provision of canned fish to the child and adult food packages. This is another example of an opportunity that will provide key nutrients, going beyond cost neutrality. It is also an improvement to food packages other than the breastfeeding package being the only package to include tuna.

CWA supports the improvements to the infant feeding package, as CDPH describes, with reductions in infant cereal and infant jarred food quantities and options for whole grains, proteins such as eggs, legumes or tofu and additional fruits and vegetables. As our understanding of infant feeding development improves, and acknowledging the infant feeding practices of diverse cultures, families should be provided with more options to receive foods that

can be appropriately prepared as table foods, and support family meals with their older infants. This is another area of best practice for WIC nutrition education with engaging materials, and recipes and cooking demos which are possible on-site in clinics and via video.

CWA strongly supports the recommendation by CDPH to adjust the formula quantity for partial breastfeeding, emphasizing the importance of education, counseling and infant feeding assessments in order to promote maximum breastfeeding and also respect when partial breastfeeding or formula feeding is the best outcome. There is no other program widely available to WIC eligible families, and quite honestly families of most income levels, that provides highly trained staff to support infant feeding decisions in the prenatal and especially postpartum periods with the many time sensitive decisions families make often on a daily basis in the first weeks and year of an infant's life.

CWA supports the provision of breast pumps as a program benefit. Although the Affordable Care Act included breastfeeding support, provision of support by trained staff and a breast pump as a health plan benefit has not been effectively established in California and other states. Provision of breast pumps through health plans is often not within the windows of time to support breastfeeding, can involve many bureaucratic processes, and breast pumps are often not of a quality to initiate or support a milk supply. Although health plans are to be the first line of support, in reality WIC is the main support in most states. Thankfully WIC invests in quality staff training and requires effective breast pump specifications. Until we see better continuity of care by health plans, WIC must provide this support.

While these recommendations represent a portion of the proposed rules, the ones CWA has selected involve significant nutrition and lactation education and support. The long history of health improvements attributed to participation in the WIC program is a result of a combination of critical components, including healthy foods, thoughtful nutrition and lactation education and support, and a trained, culturally competent and dedicated workforce. Much of the success of the food packages in providing nutrients for WIC families and supporting healthy habits, resulting in decades of documented, improved health outcomes, including reduced anemia, reductions in obesity, and increased breastfeeding, among others, is because of the thoughtful education and support provided in local WIC agencies. Different from just three years ago, WIC staff are adjusting to nutrition education via more technology and also wondering about in-person education in a post pandemic environment. For the success of the new WIC foods, coordinated planning and support for nutrition education will be required.

Additional recommendations address flexibility in package sizes, such as yogurt, bread and milk and the opportunity to substitute foods, such as the protein substitutions. CWA supports these flexibilities when the state programs indicate that they are better able to provide choices in the WIC food package and improve the shopping experience. Related to shopping, the recent announcement to allow online shopping is welcomed as a strategy to improve access, address equity and improve the shopping experience. California's rural and frontier areas and those of other states face a number of shopping challenges that online shopping may be able to impact.

CWA urges USDA to move quickly to the final rule on the proposed food package updates and work closely with state programs and vendors in determining reasonable timelines for updated MIS systems, apps and EBT cards. As CDPH comments note, state programs have information on the labor involved in updating the MIS system. Updated food packages, along with flexibilities for presence and remote services, could be attractive enough to support the recent increase in program participation and hopefully even boost participation, as we emerge from the challenges of the pandemic and formula crisis and face a time of predicted food and financial insecurity. Many current WIC participants only experienced the food package increases and

flexibilities during the last three years. Quickly approving and implementing new food packages could continue to support WIC participation.

CDPH and other states comments on the food package proposals, supported with redemption patterns, is very useful for making decisions to improve and adjust food packages. Redemption data can also be very informative in understanding trends in WIC food redemptions and public health outcomes. States differ in the redemption data available for not only research but for WIC staff to tap into when designing and evaluating nutrition education strategies. CWA urges USDA and states to make this data available to maximize food redemption and education strategies.

Finally, CWA urges USDA to consider the outreach and marketing strategies when the updated food packages are released. In 2009, the very popular Healthy Habits campaign and partnership with Sesame Street, amplified the long awaited improvements with upbeat and coordinated messages. We encourage support for states and local agencies to participate in a national campaign.

Thank you for reviewing our comments and the important and exciting work of USDA to update the WIC food packages.

Kind regards,



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Executive Director

Oklahoma Department of Health, Fiscal Year 2022 Oklahoma WIC Food List (last updated Oct. 2021), <https://oklahoma.gov/content/dam/ok/en/health/health2/aem-documents/family-health/wic/foods/wic-approved-food-list-english.pdf>.

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