

Janet Murguia, President

November 1, 2006

Patricia N. Daniels
Director
Supplemental Food Programs, FNS/USDA
3101 Park Center Drive, Room 528
Alexandria, VA 22302

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

Dear Director Daniels:

The National Council of La Raza (NCLR), the largest national Latino civil rights and advocacy organization in the U.S., writes to comment on the United States Department of Agriculture's (USDA) proposed modifications to the Special Supplemental Women, Infants, and Children's (WIC) food packages.

NCLR praises this important step to improve the overall nutritional quality, expand availability of culturally-sensitive foods, and increase choices available to participants of the WIC program. By including allowances for fruits and vegetables; adding whole grain bread and rice and the option for corn tortillas; adding options for soy milk, milk substitutes, and tofu; and changing to only low-fat milk and whole grain cereals, the WIC packages more completely reflect the *2005 Dietary Guidelines for Americans* recommended by the USDA and the Department of Health and Human Services. In addition, the new proposed packages more readily attend to the cultural needs of WIC's diverse participant population.

These changes will be highly important to the Latino community. According to the USDA, of the 7.9 million participants in the WIC program in 2004, Hispanics made up the largest participant group at 39.2%. The WIC program is highly accessible for Latino mothers and children, the fastest growing youth population in the U.S. The WIC program has already done an outstanding job of improving health care outcomes for Latino families who often do not have access to health coverage, are less likely to access prenatal care, and are more likely to be food insecure. The new proposals will build on the success that WIC has had in reducing major negative health effects, improving birth outcomes for Latino communities, and ensuring that children in critical stages of development have a healthy start to life.

The increased allowances for fruits and vegetables along with the expanded options to include corn tortillas, whole grains, and milk substitutes, will have an especially notable impact on the Latino community. Allowing the substitution of corn tortillas for whole grain breads will significantly enhance the choices Latino participants are able to make with their WIC packages and help to facilitate more nutritious and culturally-appropriate food choices. In addition, the

milk substitutions help to greatly expand the consumption of dairy products, thus improving their calcium intake. For Hispanics, as well as other racial and ethnic minority groups, studies have shown a much lower consumption of dairy products due to higher rates of lactose intolerance. With the new inclusion of fortified soy milk and tofu, Latinos will have an easier time consuming sources of both calcium and vitamin D.

These new proposals will not only help provide nutritious foods for otherwise nutritionally vulnerable mothers and children, but will also help inform and form healthy eating habits for children beginning at an early age and help prevent the growing trend of obesity in the U.S.

While pleased with the new direction that the USDA has taken, NCLR recommends additional improvements to ensure that WIC reaches its full potential for Hispanic participants. NCLR offers the following recommendations:

Increase the Fruit and Vegetable Benefits to those Recommended by the Institute of Medicine (IOM)

NCLR commends the USDA for including expanded allowances for fruits and vegetables in the new food package. However, the value of the WIC fruit and vegetable benefit in the proposed rule is \$8 for women and \$6 for children, which is likely to result in unmet nutritional needs for children and families. At a minimum, the IOM recommendations that provide \$2 more for both women and children should be allowed under the new WIC package. The IOM recommendations were aimed to achieve the highest nutritional value and were based in solid scientific research. While the USDA's recommendations are designed to be cost neutral, it is clear that increasing fruits and vegetables is associated with important health benefits, such as reduced risk for obesity and chronic disease, and that they help to provide adequate intake of nutrients, such as fiber, potassium, and vitamins A and C, thus reducing health care costs due to nutrition deficits and other health problems in the future. We urge the USDA to provide the IOM recommended benefits of \$10 for women and \$8 for children for fruits and vegetables.

Refine Regulations for Whole Grain Cereals

The new proposals for whole grain cereals are an important step to limiting sugar and improving iron intake; however, the proposed standards create barriers to achieving culturally-appropriate and healthy choices. The new proposal standards requiring "51% whole grain" is not an appropriate measure for bran, corn, and rice cereals as their nutritional value is not measured in this manner, and thus they are eliminated from being an option. This creates a barrier to nutritious foods for those participants who prefer corn-based cereals, including the majority of the approximately 2.5 million Latino women and children in WIC. In addition, for those who have wheat allergies, corn- and rice-based cereals provide a healthy and viable substitute.

Remove Prescription Requirement for Soy Milk and Tofu

Proposals in the new packages allow for milk and dairy substitutes to include tofu and calcium and vitamin D-rich soy beverages, which provide particularly helpful benefits for WIC participants who suffer from lactose intolerance. Between 50% to 80% of Latinos experience some lactase deficiency, inhibiting their ability to process the lactose in certain dairy products, such as milk and cheese. The new package allows women to have open access to soy milk and/or tofu. However, the proposals require children to have a medical prescription to have soy

milk or tofu as substitutes. This requirement will impose administrative burdens on state agencies and WIC organizations and delay access to alternative calcium sources for WIC children. In particular, for families with language barriers, the extra process created by accessing a restriction can be a heavy deterrent to access much-needed nutrients. A prescription for these food items is highly unnecessary since these foods will provide nutritional benefits equal to traditional milks allowed under the WIC package.

In closing, NCLR strongly supports and recommends the new Food Packages Rule proposed by the USDA for the WIC program, with the above recommendations. WIC provides important nutritional benefits for Hispanic women and children, even more so as they participate in the program at higher numbers than any other group in the U.S. The new proposals for the food packages will increase the important nutrients already present in WIC and identified as crucial to the development and health of the WIC population. With the inclusion of the recommendations outlined above, the new WIC food packages will greatly assist in improving the health of the most nutritionally at-risk women, infants, and children.

Should you have any questions regarding these comments, please contact NCLR without hesitation. NCLR health policy staff, Jennifer Ng'andu and Emilia Gianfortoni, can be reached by phone at (202) 785-1670.