



February 17, 2023

WIC Association of New York State, Inc. has reviewed the revisions in the Women, Infants, and Children Food Packages and is writing in strong support of USDA's proposed updates to the WIC food packages to align them with current Dietary Guidelines while offering families a wider choice to accommodate personal and culture preferences. As the leading NYS nonprofit organization supporting and enhancing the services of the WIC Program and its direction for the future, we represent 93 local WIC agencies and Vendor Management organizations. Our working volunteer board of directors is made up of WIC directors, coordinators, vendor management, partner advocates, and participants who work together with providers, regional offices, and central office to ensure that WIC Agencies are supported and that WIC participants receive a high level of person centered and comprehensive care with their critically important WIC benefits and services.

NYS WIC currently has the nation's 4th largest statewide caseload; since October 2022, we have topped 400,000 participants each month, the highest our caseload has been since 2018, but yet we are serving only about one-half of estimated eligible New Yorkers. Our state is very culturally and geographically diverse, and the unmet need in many upstate areas and among ethnicities, especially among pregnant women and children, is even wider. The proposed rule takes several steps in the right direction toward making WIC more inclusive and culturally relevant and steps towards right-sizing the outdated purchase value of the food packages. With these improvements and more, we will increase program participation, improve WIC participants' health outcomes, address maternal and child health inequities, and ultimately, help end hunger.

We know that streamlining the participant experience and improving the in-store experience will go a long way in helping more families with young children benefit from WIC's ability to support learning and development outcomes, reduce food insecurity, and alleviate poverty as the nation recovers from the health and economic fallout of the COVID-19 pandemic. WIC is the nation's premiere supplemental nutrition program. Parents trust and turn to WIC based on its long record of improving health outcomes for babies and young children, which is rooted in a science-based process and expert advice from WIC counselors that prioritizes consumption of healthy foods.

Results of an extensive body of research over four decades shows that WIC participation nationally is associated with healthier births, reduced infant mortality, better infant-feeding practices, more nutritious diets, better access to primary and preventive health care, and improved cognitive development and academic achievement. These results highlight the importance of ensuring that WIC continually aligns with current nutrition science and that all eligible women and young children can get WIC benefits during pregnancy and critical periods of child development.

We support the proposed rule in all areas, and strongly support the proposed rule in the following areas that will improve participant access to healthy WIC foods and provide greater opportunity to introduce WIC children to a balanced diet of nutrient-dense foods:

- Make permanent the recent increases in fruit and vegetable benefit, which would provide 50% of fruit and vegetable intake recommended by the Dietary Guidelines for Americans (DGAs) and maintain elevated benefits throughout implementation as states adjust their systems and program in the new food packages.
- Add a monthly issuance of low mercury seafood options across the children and adult food packages and avoid complex issuance patterns that can deter participant retention.
- Strengthen whole grain intake and include 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. Additional cultural options will both reflect traditional diets honored by WIC families while making the program more accessible to new immigrants and refugees as they settle in the United States.
- Strengthen standards for companies that manufacture WIC-approved products – including cereals and dairy – to improve child health outcomes by increasing whole grain intake and reducing sugars and saturated fats.
- Expand package size ranges across all food categories to allow a broader range of approved products on the grocery store shelf.
- Create a pathway for new products that are nutritionally comparable with WIC foods to be approved, such as plant-based dairy alternatives, in order to better accommodate WIC participants with a variety of allergies and intolerances, as well as cultural and dietary preferences.
- Authorize legumes and peanut butter and option for tofu as an egg substitution to accommodate allergies, vegan diets and cultural preferences.
- Prioritize WIC services and funding to promote and support sustained breastfeeding.

The proposed rule is also a step in the right direction regarding requiring WIC vendors to stock at least 3 forms of vegetables. This would further improve WIC's already proven result in improving nutrition throughout a community. In NYS, vendors are already required to stock 3 forms of vegetables and 3 forms of fruit, and 1 of them must be fresh. At a minimum, USDA should require the rest of the country to rise to NYS standards.

While we support the proposed rule that was heavily guided by the NASEM report, we understand that the report writers were bound to keep the WIC package cost neutral. If the WIC package had kept up with inflation these past decades, the food package would be currently valued at approximately \$100/month in today's dollars. One of the goals of the proposed changes is to increase the actual and perceived value of the WIC food packages to eligible populations.

The original CVB is credited with improving the diets of WIC families. With the increase, WIC participants can buy and eat even more healthy vegetables and fruit – and even explore new ones for them. This overdue and important increase greatly improved nutritional access, equity, and quality of life for WIC families across New York, has helped retain and increase our child caseload, and has been met with great appreciation. For example:

“Hi. I live in Suffolk County. I have a 2.5 year old son, Ross, and a 1.5 year old son, Jaxon. We absolutely benefit from this increase because my sons have digestive issues and to have more access to fresh fruits and vegetables truly helps them maintain a healthy digestive system without the need to medication as often. One of my sons is also a very picky eater but loves to eat all fruits and vegetables so it is always our go-to food. We could use the increase along with any other increase we buy not only the fresh fruits and vegetables but the canned peas and apple sauce helps my youngest and he loves them, along with both loving fruit popsicles but making them ourselves so they can be healthier for them during the summer. Overall it has helped us tremendously!”

The proposed rule should go even further in the following areas to improve health, balance, choice, and equity for WIC participants:

- Provide substitution options (like the proposed exchange of 50%/100% of jarred fruit/vegetable for more CVB) that are financially equitable and equivalent to the child’s CVB appropriate portion size. This would allow parents and caretakers the real option of making food for their babies and increased opportunity for infant nutrition education from WIC nutritionists.
- Eliminate default juice issuance and allow juice only as a substitution at participant request;
- Require a stock requirement for alternatives to liquid cow milk;
- Add a cash value benefit for missing protein sources and right-size the food package with current purchase power
- Allow more alternatives to fluid milk, including organic options
- Authorize canned legumes in addition to dried legumes

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.

Sincerely,

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