



American Society for Nutrition
Excellence in Nutrition Research and Practice

February 21, 2023

U.S. Department of Agriculture
WIC Administration, Benefits, and Certification Branch, Policy Division, Food and Nutrition Service
1320 Braddock Place, 3rd Floor
Alexandria, Virginia 22314

Re: Docket No. FNS-2022-0007-0001, Special Supplemental Nutrition Program for Women, Infants, and Children: Revisions in the Women, Infants and Children Food Packages

To Whom it May Concern,

The American Society for Nutrition (ASN) appreciates the opportunity to comment on the proposed revisions to the food packages for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). Established in 1928, ASN is a non-profit organization dedicated to our mission of advancing the science, education, and practice of nutrition. ASN has more than 8,000 members around the world, working throughout government, clinical practice, academia, and industry, to conduct research to achieve the ASN vision of “A Healthier World Through Evidence-Based Nutrition”.

ASN supports USDA’s proposed revisions to the WIC food packages which prioritize improved nutrition security and equity, and help to support and improve the health and nutrition of infants, young children, and mothers. Aligning the WIC food packages with the current *Dietary Guidelines for Americans (DGAs)* and recommendations in the National Academies of Sciences, Engineering and Medicine (NASEM) 2017 report, “Review of WIC Food Packages: Improving Balance and Choice,” reflects the latest nutrition science to best support the health of growing children and allow WIC shoppers to purchase more and varied healthy foods and broaden WIC’s public health impact on participants, as well as the broader community.

The *DGAs* identify several key food categories where the vast majority of Americans, including children and pregnant women, fall short of recommended intakes. The proposed increased cash value voucher amount for fruit and vegetable purchases, the requirement that vendors stock at least three varieties of vegetables, and the requirement that state agencies authorize at least one other form of fruits and vegetables for purchase in addition to fresh, positions WIC to increase consumption of these priority food groups for WIC participants and will allow WIC participants to more easily meet the 50% of fruit and vegetable intake recommended by the *DGAs*.

USDA’s proposed updates to the WIC food packages will enhance access to healthy options – like fruits and vegetables, the addition of canned fish to many packages, and the expansion of whole grain offerings to include more culturally relevant options. While providing for more

options, including lactose-free milk, it is important that dairy substitutions be nutritionally comparable to milk in order to be approved. With the exception of soy-based alternatives, the *DGAs* do not include other plant-based beverages as part of the dairy group because their overall nutritional content is not similar and key nutrients found in dairy and soy-based alternatives are often lacking.

The National Strategy on Hunger, Nutrition, and Health acknowledges that stronger nutrition standards across federal programs can “help increase diet quality of beneficiaries and spur companies to reformulate food products.”ⁱ Updated food packages will benefit more than 6.3 million WIC participants and, most significantly, the 4.9 million women and children who will receive enhanced fruit and vegetable benefits.ⁱⁱ This increase sets the stage for healthier outcomes at key periods of growth and development, as well as the formation of lifelong taste preferences that could encourage healthier diet patterns beyond the duration of WIC eligibility.ⁱⁱⁱ

Proper nutrition informs healthier outcomes and can mitigate or prevent the onset of chronic diet-related disease. Obesity, diabetes, and heart disease alone account for nearly \$650 billion in healthcare costs each year, affecting more than one-in-five children.^{iv} Nutrition interventions that mitigate chronic disease earlier in life, such as WIC, can have a substantial effect over time, as children with obesity are five times as likely to have obesity as adults.^v In addition, targeted nutrition support during pregnancy and early childhood can address micronutrient deficiencies that result in health conditions like neural tube defects and iron-deficiency anemia. By further addressing critical nutrient inadequacies at important stages of development, WIC’s targeted intervention will better contribute to the broader public health, curb chronic diet-related conditions and set the stage for healthier outcomes.

Thank you again for the opportunity to comment and offer ASN’s support for the science-based revisions proposed by USDA to align the WIC food packages with nutrition science-based policies and reports. Please contact Sarah Ohlhorst, MS, RD, ASN Chief Science Policy Officer (240-428-3647; sohlhorst@nutrition.org) if ASN may provide additional information.

Sincerely,



Martha A. Belury, PhD, RDN
2022-2023 President, American Society for Nutrition

ⁱ White House, Biden-Harris Administration National Strategy on Hunger, Nutrition, and Health (Sept. 2022), at 24, <https://www.whitehouse.gov/wp-content/uploads/2022/09/White-House-National-Strategy-on-Hunger-Nutrition-and-Health-FINAL.pdf>.

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- ⁱⁱ See U.S. Department of Agriculture, Food and Nutrition Service. WIC Data Tables, Monthly Data – State Level Participation by Category and Program Costs, FY 2022 (preliminary), <https://www.fns.usda.gov/pd/wic-program> (note: August 2022 data as most recent month).
- ⁱⁱⁱ See Johnson SL (2016) Developmental and Environmental Influences on Young Children’s Vegetable Preferences and Consumption. *Advances in Nutrition* 7(1):220S-231S, <https://doi.org/10.3945/an.115.008706>.
- ^{iv} Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion. Health and Economic Costs of Chronic Diseases (last updated Sept. 8, 2022), <https://www.cdc.gov/chronicdisease/about/costs/index.htm>.
- ^v Simmonds M, et al. (2015) Predicting adult obesity from childhood obesity: a systematic review and meta-analysis. *Obesity Reviews* 17(2):95-107, <https://doi.org/10.1111/obr.12334>.