

January 2010

Debra Whitford
Director, Supplemental Food Programs Division
Food and Nutrition Service
U. S. Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, VA 22302

RE: Docket ID Number 2006-0037, WIC Food Packages Interim Rule

Dear Ms. Whitford:

As the Department finalizes the WIC Food Package rule, we ask that you consider the following recommendations:

1. Increase the cash-value of the fruit/vegetable voucher for WIC children to \$8/month as originally recommended by the Institute of Medicine

We applaud Congress's decision in the FY2010 Agriculture Appropriations Act to increase the cash-value of the WIC fruit/vegetable vouchers for women to \$10/month and the interim rule published on December 31, 2009 that instructs State WIC Agencies that they can implement this change immediately or by April 30, 2010.

Now, its time to increase the cash-value of the fruit and vegetable voucher for WIC's 4.7 million children to \$8/month as originally recommended by the Institute of Medicine (IOM)'s Report: *WIC Food Packages: Time for a Change*.

Because of the importance of doubling fruit and vegetable consumption for all children in the United States to meet the 2005 Dietary Guidelines for Americans, the vulnerable WIC population should not be short changed. An important objective of the IOM was to ensure that the new WIC Food Packages would provide at least one additional serving of fruit or vegetable each day. It is not possible add one additional daily serving of fruits and vegetables for \$6/month.

Therefore, we strongly recommend that the cash-value of the children's fruit/vegetable voucher be increased to \$8/month as recommended by the IOM.

2. Increase the cash-value of the fruit/vegetable voucher for fully breastfeeding women to \$12/month to incentivize WIC moms to breast feed their babies.

We applaud USDA's Food and Nutrition Service for providing fully breastfeeding WIC mothers with a \$10/month voucher for fruits and vegetables in the interim rule. This additional \$2/month for fruits and vegetables, above the \$8/month that non-fully breastfeeding WIC Moms receive, was designed to incentivize the food package for fully breast feeding Moms. The extra \$2/month for fruits and vegetables contributed to the overall enhanced value of the food package for women who choose to fully breastfeed.

Now that non-breastfeeding WIC Moms receive vouchers for \$10/month for fruits and vegetables, we support the National WIC Association's request to increase the cash-value of the fruit/vegetable vouchers for fully breastfeeding WIC Moms to \$12/month.

Therefore, we strongly urge USDA's Food and Nutrition Service to increase the cash-value of the fruit/vegetable vouchers for breastfeeding Mothers to \$12 a month. This will enhance the value of the food package for breastfeeding mothers and encourage more WIC mothers to breastfeed their babies.

3. Require State WIC Agencies to allow split tender to enable WIC families to maximize the full benefit of their fruit/vegetable vouchers.

Split tender provides WIC families with the ability and option to add cash to their fruit/vegetable voucher purchases at check out so they can fully maximize their benefits.

Currently, 12 State WIC Agencies including: Colorado, Delaware, Illinois, Maine, Massachusetts, Mississippi, Missouri, Montana, New Hampshire, Texas, Utah, and Wyoming disallow split tender. The result is that WIC families in these states have to put a fruit/vegetable item back so they do not go over the cash value of their fruit/vegetable voucher. The ultimate result is that they are never able to realize the full value of their \$6/month or \$10/month benefit for fruits and vegetables.

Disallowing split tender negatively impacts public health for the vulnerable WIC population in these 12 states. This decision impacts 2 million WIC participants which is approximately 22% of the total WIC population.

In the interim rule USDA's Food and Nutrition Service encouraged State WIC Agencies to allow split tender. Thirty-eight State WIC Agencies followed this recommendation and allow split tender. States report no problems from retail vendors with implementation. There also appears to be no problem with small vendors in these 38 states.

If the issue in the 12 states disallowing split tender is of concern for small vendors, then perhaps an exception can be made for these vendors or a phase in period that allows State WIC Agencies to work with these vendors to bring them into compliance. Also, 38 State WIC Agencies are making this work. Perhaps USDA can promote best practices and provide technical assistance to resolve the disparity.

Therefore, we strongly recommend that USDA require State WIC Agencies to allow split tender so that WIC families can realize the full value of their fruit and vegetable vouchers.

Thank you for the opportunity to contribute suggestions on how to strengthen the WIC Food Packages final rule.