



Well Beyond Medicine

**National Office of Policy
& Prevention**

1201 15th St. NW
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Washington, DC 20005

United States Department of Agriculture
WIC Administration, Benefits, and Certification Branch
Policy Division, Food and Nutrition Service
P.O. Box 2885, Fairfax, Virginia 22031-0885

RE: Special Supplemental Nutrition Program for Women, Infants, and Children:
Revisions in the Women, Infants, and Children Food Packages

Dear Secretary Vilsack,

On behalf of Nemours Children's Health, I write in strong support of the United States Department of Agriculture's (USDA) proposed updates to the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) food package. Thank you for your leadership in supporting policy changes that promote health for America's families and young children. WIC provides critical supports to moms and babies, including access to quality nutrition, to help young children grow up healthy. Nemours Children's refers patients to WIC because we trust its long record of improving health outcomes for babies and young children.

The recent increase in fruit and vegetable benefits is a clear example of how WIC supports healthy nutrition, especially for young children. USDA's proposed updates will further enhance access to healthier options and benefit more than 6.3 million WIC participants, especially the 4.9 million women and children who will receive enhanced fruit and vegetable benefits.ⁱ 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.ⁱⁱ

ABOUT NEMOURS

Nemours Children's Health is one of the nation's largest multistate pediatric health systems, which includes two free-standing children's hospitals and a network of more than 70 primary and specialty care practices. Nemours Children's seeks to transform the health of children by adopting a holistic health model that utilizes innovative, safe, and high-quality care, while also caring for the health of the whole child beyond medicine. Nemours Children's also powers the world's most-visited website for information on the health of children and teens, [Nemours KidsHealth.org](https://www.NemoursKidsHealth.org).

The Nemours Foundation, established through the legacy and philanthropy of Alfred I. duPont, provides pediatric clinical care, research, education, advocacy, and prevention programs to the children, families and communities it serves. For more information, visit [Nemours.org](https://www.Nemours.org).

NEMOURS' SUPPORT FOR THE PROPOSED REVISIONS

Nemours was honored to participate in the September 2022 White House Conference on Hunger, Nutrition and Health where the Biden-Harris administration outlined its National Strategy to end hunger and increase healthy eating and physical activity to mitigate chronic diet-related disease. Since we know first-hand that hunger and nutrition are interconnected and have a pronounced impact on health outcomes,

especially for young children, Nemours made a [commitment](#) to contribute to the realization of this strategy. We look forward to implementing our commitment and to continued collaboration with USDA and other federal agencies on initiatives to support the health of children and families.

Access to nutritious food contributes to healthier outcomes and can mitigate or prevent the onset of chronic diet-related disease. Obesity, diabetes, and heart disease affect more than one-in-five children and alone account for nearly \$650 billion in healthcare costs each year.ⁱⁱⁱ Children with obesity are five times as likely to have obesity as adults.^{iv} Nutrition programs, such as WIC, that can help prevent or mitigate chronic disease earlier in life can have a substantial effect over time. We believe that the new WIC food package would be a critical piece of advancing the National Strategy.

Nemours supports the revised WIC food package because it is grounded in science, and can help address food insecurity, support health, and address obesity.

Supporting Evidence-based Policy

Nemours strongly believes it is critical to base nutrition policy on science and evidence. Importantly, this proposed rule is rooted in the National Academies of Sciences, Engineering, and Medicine's (NASEM) independent, science-based recommendations and reflects the scientific advice of the 2017 NASEM report as well as the most recent edition of the Dietary Guidelines for Americans (DGA), demonstrating an ongoing commitment to building upon the public health advances secured in the 2009 food package review.

The 2017 NASEM report specifically prioritized increases to the cash value benefit (CVB) for fruits and vegetables, whole grains, and seafood because of known trends of underconsumption across the child and adult populations. For example, 100% of children fall short of DGA-recommended seafood intake, 99% fall short of recommended vegetable intake, and 93% fall short of recommended whole grain intake.^v Evidence demonstrates the nutritional importance of these food categories and supports efforts to address trends of underconsumption. For example, seafood is an important source of protein and other nutrients like iron, choline, omega-3 fatty acids, calcium, and vitamin D that are a priority for the WIC population. Whole grains deliver additional key nutrients like folate, and whole fruits and vegetables provide an array of nutritional benefits such as healthy fiber and essential vitamins and minerals. Yet, only a fraction of recommended intake for these categories is currently delivered through the child food package.^{vi}

We applaud USDA's proposed rule which would ensure that the WIC food packages reflect current nutrition science and deliver improved results for participating WIC families. The proposed updates to the WIC food package would establish higher values for the CVB to reach target intake for fruits and vegetables, strengthen whole grain intake by offering a broader range of nutritionally appropriate whole grain options, and expand access to seafood, from only 3.4% of WIC participants to an estimated 58.7%.

Addressing Food Insecurity

As you know, USDA estimated that 10.2% of U.S. households were food insecure in 2021. This means that 13.5 million households did not have enough food at times throughout the year.^{vii} USDA also found that, even before food price increases during the COVID-19 pandemic, 61% of participants in the Supplemental Nutrition Assistance Program (SNAP) identified high food costs as the most prevalent barrier to shopping for foods that are part of a healthy diet.^{viii} WIC's increased issuance of fruits and vegetables is one of the most substantial investments in food security in recent years.

With the increased amounts first put in place by Congress in 2021, USDA's proposed rule would take a significant step forward in establishing healthy eating patterns by affirming WIC benefit issuance at 50% of DGA-recommended intake,^{ix} as recommended by NASEM.

Supporting Health through increased Cash Value Benefit

We recognize that the increased Cash Value Benefit (CVB) was incredibly well received by program participants after it was implemented in spring 2021, resulting in rapid and measurable increases in fruit and vegetable consumption (averaging a ¼ cup per day increase for WIC-enrolled children).^x In addition to addressing key nutrient gaps, the CVB is the most versatile element of the WIC food package, providing a greater degree of choice that can empower WIC families to reflect cultural eating patterns and experiment with new varieties. Therefore, we support the proposal to codify the existing, temporary increase in order to help improve health outcomes and close intake disparities for many years to come.

Addressing Obesity

In addition to increasing access to nutritious foods, the proposed updates to the WIC food package are poised to enhance WIC's public health impact by further aligning the WIC food packages and nutrition standards with the DGA. For example, childhood obesity reductions for WIC toddlers stemmed from improved dietary quality related to shifts in the WIC food packages that were first implemented in 2009. Once implemented, the 2009 food package revisions were associated with increased consumption of whole grains, fruits, vegetables, legumes, and lower-fat milk, as well as decreased consumption of whole milk.^{xi} WIC participants also reported reduced intake of sodium, saturated fat, and sugar.^{xii} As a result, children participating in WIC reported higher scores on the Healthy Eating Index,^{xiii} with even larger gains reported for children who remain connected to the program for the duration of eligibility.^{xiv}

CONCLUSION

Nemours is encouraged by USDA's proposed revisions to WIC food packages and believes they will meaningfully advance the National Strategy on Hunger, Nutrition and Health and its core goals of ending hunger and promoting healthy eating. We are pleased to support this proposed rule. Please do not hesitate to reach out to me at Daniella.Gratale@nemours.org or Katie Boyer at Katie.Boyer@nemours.org if we can be of further assistance.

Sincerely,



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ⁱ 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).

ⁱⁱ 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>.

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- iii 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>.
- iv 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>.
- v National Academies of Sciences, Engineering and Medicine (2017) Review of WIC Food Packages: Improving Balance and Choice: Final Report, at 255. <https://doi.org/10.17226/23655>.
- vi National Academies of Sciences, Engineering and Medicine (2017) Review of WIC Food Packages: Improving Balance and Choice: Final Report, at 843. <https://doi.org/10.17226/23655>.
- vii Coleman-Jensen A, et al. (2022) Household Food Security in the United States in 2021, Economic Research Report No. 309, <https://www.ers.usda.gov/webdocs/publications/104656/err-309.pdf?v=3567.9>.
- viii Gearing M, Dixit-Joshi S, May L (2021) Barriers That Constrain the Adequacy of Supplemental Nutrition Assistance Program (SNAP) Allotments: Survey Findings. U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support. <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNAP-Barrier-SurveyFindings.pdf>.
- ix U.S. Department of Agriculture, Food and Nutrition Service. Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Revisions in the WIC Food Packages, Proposed rule, at 13, <https://fns-prod.azureedge.us/sites/default/files/resource-files/wic-fr-112122.pdf?eType=EmailBlastContent&eld=6a183be4-23c8-4619-bbe9-8928fa68d112>.
- x Ritchie L, et al. (2022) Multi-State WIC Participant Satisfaction Survey: Cash Value Benefit Increase During COVID. National WIC Association & Nutrition Policy Institute. <https://s3.amazonaws.com/aws.upl/nwica.org/nwa-multi-state-cyb-report-march-2022.pdf>.
- xi Whaley SE, et al. (2012) Revised WIC Food Package Improves Diets of WIC Families. *Journal of Nutrition Education and Behavior* 44(3):204-209, <https://doi.org/10.1016/j.jneb.2011.09.011>;
Chiasson MA, et al. (2013) Changing WIC changes what children eat. *Obesity* 21(7):1423-1429, <https://doi.org/10.1002/oby.20295>.
- xii Andreyeva T, Tripp AS (2016) The healthfulness of food and beverage purchases after the federal food package revisions: the case of two New England states. *Preventive Medicine* 92:204-210, <https://doi.org/10.1016/j.ypmed.2016.08.018>.
- xiii Tester JM, Leung CW, Crawford PB (2016) Revised WIC Food Package and Children's Diet Quality. *Pediatrics* 137(5). <https://doi.org/10.1542/peds.2015-3557>.
- xiv Weinfield NS, et al. (2020) Longer participation in WIC is associated with better diet quality in 24-month-old children. *Journal of the Academy of Nutrition and Dietetics* 120(6):963-971, <https://doi.org/10.1016/j.jand.2019.12.012>.