



National WIC Association



NEMOURS CHILDREN'S HEALTH



September 16, 2022

The Honorable Thomas Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Secretary Vilsack:

On behalf of the undersigned organizations, we thank you for your leadership in building a national strategy to promote nutrition security. Closing disparities in access to healthy foods is the foundation for turning the tide on chronic diet-related conditions that disproportionately impact communities of color, including obesity, diabetes, and hypertension. The forthcoming proposed rule to revise the food packages in the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) presents a substantial opportunity to advance equitable access to nutritious foods. As part of USDA's review, **we strongly urge adherence to science-based recommendations, including the requirement that all breakfast cereals provided through WIC comply with the whole grain-rich standard employed in other federal nutrition programs.**

WIC has a proven track record of improving pregnancy, birth, and child nutrition outcomes, setting the stage for a healthier next generation. Comprehensive revisions to the WIC food packages in 2009 are associated with a 9 percent reduction in the rate of childhood obesity among WIC toddlers, with an even more pronounced effect on Hispanic, American Indian, Asian, and Pacific Islander children.¹ Although breakfast cereals have been issued through WIC food packages since the program's inception in the 1970s,² the 2009 food package changes established a whole grain requirement for breakfast cereals and added other whole grain options.³ The addition of whole grains to WIC's offerings roughly doubled the associated effect of WIC participation on the purchase of whole grain products⁴ and resulted in a 17 percent increase in whole grain consumption among WIC participants,⁵ contributing to a national increase in whole grain consumption among adult women (by 34 percent) and toddlers (by 46 percent) between 2007 and 2012.⁶

Healthier food options are reinforced by WIC's professional nutrition and dietetics workforce, who work with families to inform dietary behaviors and support dietary choices that align with the Dietary Guidelines for Americans while honoring cultural preferences and traditions. The 2009 food package revisions demonstrated the success of coupling healthier choices – including fruits, vegetables, and whole grains – with support from WIC's nutrition education professionals.⁷

We saw significant public health success with the 2009 food package revisions, and further revisions to the WIC food packages can boost intake of priority nutrients. In 2017, the National Academies of Sciences, Engineering, and Medicine (NASEM) provided an independent, science-based review of the WIC food packages and made recommendations based on the 2015-2020 Dietary Guidelines for Americans (DGAs). NASEM's review sought to improve balance and choice by providing 50 percent of DGA-recommended intake across priority food groups, ensuring consumption of nutrients essential for the health and development of WIC's target population.⁸ Constrained by a charge of cost-neutrality, NASEM's recommendations fell short of reaching that target in five food groups: fruits, vegetables, seafood, meat/poultry/eggs, and whole grains. Even with the recommended changes to the breakfast cereal category, the cost-neutral food packages would only deliver 36 percent of DGA-recommended whole grain intake for children, 18 percent for pregnant and breastfeeding women, and 9 percent for postpartum women.⁹

Adopting the whole grain-rich standard present in the school meals programs and the Child and Adult Care Food Program (CACFP) is an essential element of NASEM's efforts to leverage the modest WIC benefit to boost whole grain intake. NASEM calculated that the cereal requirements would yield a 31 percent shift in the balance between refined and whole grains.¹⁰ Children have consistently over-consumed refined grains while under-consuming whole grains, prompting increasingly clearer DGA recommendations to limit refined grain intake.¹¹ Despite the boost associated with the 2009 food package changes, whole grain intake has plateaued in recent years. 100 percent of adult women and 93 percent of toddlers in the United States fail to reach DGA-recommended whole grain intake.¹² Between 2011 and 2018, the average adult consumed 22 percent of the DGA's whole grains recommendations, with the average toddler reaching 33 percent intake. Hispanic toddlers and adults report the lowest rates of whole grain intake across racial and ethnic groups, with the average Hispanic toddler consuming 26 percent of DGA recommendations and the average Hispanic adult consuming only 16 percent.¹³ Furthermore, in a review of the whole grain-rich cereal options provided in the school meals programs from the largest K-12 school meal providers, the Center for Science in the Public Interest found that virtually all cereal products (99 percent; all but one of 95 cereal products analyzed) met the whole grain-rich standard.¹⁴ These products can easily be incorporated into the general market, which would further help ensuring that the same product has the same nutritional value no matter where it is consumed: schools, CACFP programs, or at home.

State and local providers have already demonstrated the potential of leveraging WIC's benefit and nutrition education to prioritize whole grain consumption. Oklahoma and nine Indian Tribal Organizations (ITOs) implemented a modified whole-grain standard for breakfast cereals as part of their implementation of the 2009 food package revisions. Even without the lever of a national standard that can incentivize industry reformulation and product availability, early data emerging from Oklahoma suggests that young children are consuming more whole grains and getting closer to reaching national whole grain intake recommendations.¹⁵

Oklahoma managed to significantly shift whole grain consumption among young children while providing a varied food package that appeals to diverse communities within the State, including corn cereals that are compliant with the whole-grain rich standard and corn tortillas made of whole-grain corn.¹⁶ Although Oklahoma WIC reports redemption rates for breakfast cereal that are slightly lower than the average calculated across a sample of ten geographic State WIC Agencies, it also registers lower rates for other staple food groups, such as eggs and the Cash Value Benefit for fruits and vegetables.¹⁷ Notably, redemption data analyzed by the National WIC Association indicates that Hispanic participants in Oklahoma WIC redeem breakfast cereals at a rate 21 percent

higher than non-Hispanic participants, indicating that Hispanic parents are consistently purchasing whole grain-rich options.¹⁸

The example set by Oklahoma is a testament to WIC's potential to meaningfully promote alignment with the Dietary Guidelines for Americans and ensure children get a healthy start. Focusing the WIC benefit on whole grain-rich options will allow WIC nutrition educators to support families in improving their dietary quality while honoring cultural preferences and traditions. Additionally, NASEM noted that launches for whole grain cereal products doubled worldwide by 2010.¹⁹ Should WIC implement the whole grain-rich standard for breakfast cereals at a national level, we are optimistic that USDA can build on the success of earlier WIC revisions and recent changes in the school meals programs to encourage product reformulations and other industry innovations that will result in healthier, broadly available options on the grocery store shelf for all shoppers.

We are deeply encouraged by the NASEM review's thoughtful vision for how WIC can boost priority nutrient intake and provide low-income families with the resources needed to build healthier diets. We thank you for your dedication to bolstering nutrition security for WIC's target population and urge USDA to keep faith with the science-based recommendations of the NASEM review by incorporating the whole grain-rich standard for breakfast cereals into the upcoming food package revisions.

Sincerely,

Academy of Nutrition and Dietetics
American College of Obstetricians and Gynecologists
American Heart Association
American Public Health Association
Association of State Public Health Nutritionists
Bread for the World
Center for Science in the Public Interest
Food Research & Action Center (FRAC)
First Focus on Children
Latinos and Hispanics in Dietetics and Nutrition,
a member interest group of the Academy of Nutrition and Dietetics
National WIC Association
Nemours Children's Health
Trust for America's Health

¹ See Centers for Disease Control and Prevention. Obesity Among WIC-Enrolled Young Children, Table 3 (last updated May 24, 2021), <https://www.cdc.gov/obesity/data/obesity-among-WIC-enrolled-young-children.html>.

² Robert J. Dole Institute of Politics Archive and Special Collections, Univ. of Kansas (1976) WIC Fact Sheet. https://dolearchives.ku.edu/sites/dolearchive.drupal.ku.edu/files/files/historyday/originals/hd16_wic_002.pdf.

³ See 7 C.F.R. §246.10(e).

⁴ Oh M, Jensen HH, Rahkovsky I (2016) Did Revisions to the WIC Program Affect Household Expenditures on Whole Grains? Applied Economic Perspectives and Policy 38(4), <https://doi.org/10.1093/aep/38.4.204>.

⁵ Whaley SE, Ritchie LD, Spector P, Gomez J (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>.

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- ⁶ National Academies of Sciences, Engineering, and Medicine (2017) Review of the WIC Food Packages: Improving Balance and Choice: Final Report, at 80. <https://s3.amazonaws.com/aws.upl/nwica.org/2017-nasem-report.pdf> (“2017 NASEM Report”).
- ⁷ Ritchie LD, Whaley SE, Spector P, Gomez J, Crawford PB (2010) Favorable Impact of Nutrition Education on California WIC Families. *Journal of Nutrition Education and Behavior* 42(3):S2-S10, <https://doi.org/10.1016/j.jneb.2010.02.014>.
- ⁸ *See id.* at 12.
- ⁹ *Id.* at 825-843.
- ¹⁰ *Id.*
- ¹¹ U.S. Departments of Agriculture & Health and Human Services (2020) Dietary Guidelines for Americans: 9th Edition, at 32. https://www.dietaryguidelines.gov/sites/default/files/2021-03/Dietary_Guidelines_for_Americans-2020-2025.pdf.
- ¹² 2017 NASEM Report at 189, 193.
- ¹³ *See* U.S. Department of Agriculture, Agricultural Research Service. Food Patterns Equivalents Database, 2011-2018 (last modified Jan. 6, 2021), <https://www.ars.usda.gov/northeast-area/beltsville-md-bhnrc/beltsville-human-nutrition-research-center/food-surveys-research-group/docs/fped-data-tables/>.
- ¹⁴ Center for Science in the Public Interest (2021) School Meals Corporate Report Card. https://www.cspinet.org/sites/default/files/2022-08/2021_SchoolMealsCorporateReportCard_9.pdf
- ¹⁵ Oklahoma State Department of Health (2018) Tots Brief: The Oklahoma Toddler Survey; Oklahoma Toddlers: Nutrition and Physical Activity 10(1), <https://oklahoma.gov/content/dam/ok/en/health/health2/documents/toddler-nutrition-and-physical-activity-march-2018-tots-brief.pdf> (detailing survey data demonstrating that 47% of two-year-olds in Oklahoma reached national whole grain intake recommendations between 2012-2015).
- ¹⁶ *See* Oklahoma Department of Health, Fiscal Year 2022 Oklahoma WIC Food List (last updated Oct. 2021), <https://oklahoma.gov/content/dam/ok/en/health/health2/aem-documents/family-health/wic/foods/wic-approved-food-list-english.pdf>.
- ¹⁷ National WIC Association (2022) Closing Nutrition Disparities: Boosting Whole Grain Intake to Strengthen Health Equity, <https://s3.amazonaws.com/aws.upl/nwica.org/whole-grain-rich.pdf>.
- ¹⁸ *Id.*
- ¹⁹ 2017 NASEM Report at 82-83.