



Trust for



September 16, 2022

The Honorable Thomas Vilsack
added whole grain 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.

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 Dietary Guidelines for Americans (DGA). 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.

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. 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/ppw020>

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):3210, <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: 9 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 Publi4a0h5 (i)5.5 (n)4.2 (ah5 (i)5)-07 ()-09.8 (/)2 (f)(e)5.0.6 ((I707 (20)-2 (01)6.1 1 (,70.6 (A)5