



NATIONAL WIC ASSOCIATION WIC FOOD PACKAGE REVIEW: FREQUENTLY ASKED QUESTIONS

NWA'S MISSION

The National WIC Association (NWA) provides its members with tools and leadership to expand and sustain effective nutrition services for mothers and young children.

INVESTING IN NUTRITION SECURITY

For nearly fifty years, the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) has improved nutrition and health outcomes for new parents, babies, and young children. WIC serves over 6.2 million people, including nearly half of all infants in the United States.

The 2009 food package changes were associated with healthier diets and reduced childhood obesity. USDA is now poised to again revise the food packages in spring 2022.

WHAT ARE KEY PRIORITIES THAT CAN BE ACCOMPLISHED IN A WIC FOOD PACKAGE REVIEW?

Science-based review of the WIC food packages, informed by the National Academies report in 2017, could enhance the overall value of the WIC benefit; shift benefit issuance to increase fruits, vegetables, seafood, and whole grain options; provide a broader range of nutritious options on the shelf for WIC shoppers; and strengthen nutrition standards to promote greater alignment with the Dietary Guidelines for Americans.



RULEMAKING PROCESS

WHEN WILL THE WIC FOOD PACKAGES CHANGE?

The WIC food package review is a formal rulemaking process for the U.S. Department of Agriculture (USDA). This process is expected to begin in April 2022. USDA is likely to issue a *proposed rule*, which would begin a *public comment period* - an opportunity for WIC stakeholders to share their views about each facet of the proposed changes to the WIC food packages. After the public comment period closes, USDA will review the input from WIC stakeholders and take steps to finalize new regulations. When the *final rule* is issued, WIC administrators can implement changes and issue new food packages to WIC participants.

IS THE FOOD PACKAGE REVIEW DRIVEN BY SCIENCE?

The Healthy, Hunger-Free Kids Act of 2010 requires USDA to conduct a scientific review of WIC-approved foods and update the regulations to reflect nutrition science, public health concerns, and cultural eating patterns. NWA endorses the science-based food package review process.

DOES OFFERING A PUBLIC COMMENT DURING THE FOOD PACKAGE PROCESS COUNT AS LOBBYING ACTIVITY?

No. Federal lobbying restrictions are limited to legislative activity. The WIC food package rule is a regulatory process. Stakeholder input is not only permitted, but highly encouraged to assure a reasoned decision-making process.



SCIENTIFIC BASIS OF THE WIC FOOD PACKAGES

HOW DOES USDA PRIORITIZE NUTRITION SCIENCE IN THE WIC FOOD PACKAGE REVIEW PROCESS?

Guided by the requirements of the Healthy, Hunger-Free Kids Act of 2010, USDA has now twice convened an independent panel of scientific experts to analyze the WIC food packages and offer recommendations that inform the rulemaking process. These expert panels are instructed to identify evidence-based recommendations to improve the WIC food packages and promote alignment with the Dietary Guidelines for Americans (DGAs).

WHAT IS THE 2017 NASEM REPORT?

In January 2017, the most recent scientific review of the WIC food packages was published in a final report by the National Academies of Sciences, Engineering, and Medicine (NASEM). This report, over 1,000 pages, contains comprehensive analysis documenting the nutrient intake of WIC participants and making specific recommendations to change benefit levels, required package sizes, and nutrition standards. The 2017 NASEM Report was required to provide recommendations that were culturally suitable, cost neutral, efficient for nationwide distribution, and non-burdensome to administration.

WHAT WERE GUIDING PRINCIPLES OF THE 2017 NASEM REPORT THAT SHOULD INFORM THE FOOD PACKAGE PROCESS?

The 2017 NASEM Report recognized that Congress intended WIC benefits to be supplemental, meaning that the benefit should not account for *all* nutrient needs at the critical life stages included in WIC participation. In order to maximize the delivery of key nutrients, the NASEM review sought to provide more balance and choice to participants by aligning issued food groups as closely as possible to 50 percent of DGA-recommended intake. Due to cost-neutral constraints, some food groups - namely vegetables, fruits, seafood, poultry/eggs, and whole grains - would remain below 50 percent of recommended intake even if the 2017 NASEM Report was adopted in full.

WHAT DOES COST-NEUTRALITY MEAN?

The NASEM review was required to issue cost-neutral recommendations, meaning that any suggested increases in the WIC benefit had to be offset with cuts to existing benefits. Due to this limitation, the 2017 NASEM Report could not recommend benefits that deliver 50 percent of recommended intake in several food groups. For example, the NASEM review could only recommend that \$9/month benefits for fruits and vegetables for children be increased to \$12/month, when 50 percent of recommended intake would require \$24/month.

WHY SHOULD THE FOOD PACKAGE REVIEW DEPART FROM COST-NEUTRALITY?

WIC's record of public health success is accomplished on a shoestring budget, with the average monthly benefit of \$36/month accounting for less than 9 percent of an average grocery budget. Added value for the WIC food packages can enhance access to nutritious foods at a critical time of development, leading to long-term healthcare cost savings and helping to grow a healthier next generation.

The 2017 NASEM Report was clear that reaching its goal of issuing WIC benefits that provide 50 percent of DGA-recommended intake across food groups is not possible without increased investment. A more robust WIC benefit can also enhance program retention, ensuring that children remain on the program to realize the healthful benefits of program participation until the beginning of school.

VEGETABLES AND FRUITS

WHAT IS THE WIC BENEFIT BUMP?

Outside of the usual WIC food package review process, Congress increased the overall value of the WIC benefit during the COVID-19 pandemic. This WIC benefit bump specifically increases WIC's vegetable and fruit benefit - known as Cash Value Benefit (CVB). As of October 2021, the WIC benefit bump results in a \$15/month increase for children and a \$32-36/month increase for adults, impacting over 4.7 million WIC participants.

COULD THE WIC BENEFIT BUMP BE MADE PERMANENT?

The WIC benefit bump is drawn directly from the 2017 National Academies review, which noted that values of \$24/month for children, \$43/month for postpartum, and \$47/month for pregnant and breastfeeding participants is necessary to provide 50 percent of recommended fruit and vegetable intake, based on varying diet patterns. The only distinction between the 2017 National Academies review and the WIC benefit bump is issuance at a slightly lower level than recommended for pregnant participants. USDA could make these values permanent through rulemaking.

WHAT HAPPENED TO \$35/MONTH FOR CHILDREN?

The American Rescue Plan Act increased vegetable and fruit benefits to \$35/month for both children and adults, but that increase expired on September 30, 2021. When Congress extended the WIC benefit bump, it reset values at the NASEM-recommended levels. As children have lower-calorie diet patterns than adults, this resulted in children facing a decrease in monthly benefits - even though the \$24/month value is still a marked increase from baseline values of \$9/month.

Maintaining the \$35/month benefit levels for children would have an even greater impact. Adjusting for redemption rates, a \$35/month benefit would deliver 48.9% of recommended intake to WIC participants. Additionally, the National WIC Association and Nutrition Policy Institute surveyed 10,000 WIC participants across 5 State WIC Agencies in 2021, with 94% indicating a preference for vegetable and fruit benefits above \$24/month.

HOW DOES THE 2017 NASEM REPORT ADDRESS 100% FRUIT JUICE?

100% fruit juice is currently issued at more-than-supplemental levels, equivalent to 107 percent of the lower end of the recommended range for children. Based on recommendations from the DGAs and the American Academy of Pediatrics that most fruit intake should be from whole fruits, the 2017 NASEM Report reversed this imbalance - reducing juice issuance to provide more resources to strengthen the Cash Value Benefit. The 2017 NASEM Report also recommended that participants be able to substitute any issued juice for additional Cash Value Benefit.

HOW CAN THE WIC FOOD PACKAGE REVIEW ENHANCE COMMUNITY ACCESS TO VEGETABLES AND FRUITS?

In addition to adjusting issuance levels, the 2017 NASEM Report recommended that WIC revise program rules to enhance access to fruits and, in particular, vegetables. The 2017 NASEM Report recommends requiring State WIC Agencies to authorize at least two forms of vegetables and fruits (i.e., fresh, frozen, canned, dried), while also requiring retailers to stock at least three types of vegetables. Minimum stock requirements in the 2009 food package changes were associated with increased access to produce, especially in low-income neighborhoods.

HOW CAN USDA BUILD ON THE 2017 NASEM REPORT'S RECOMMENDATIONS WITH RESPECT TO VEGETABLES AND FRUITS?

Setting aside cost-neutrality is a necessary step to assure adequate access to vegetables and fruits. The WIC benefit bump demonstrates how additional investment can go a long way to improving diet patterns and setting the stage for healthier outcomes. USDA should not only codify the WIC benefit bump, but also resolve the disparity for pregnant participants. With even greater investment, the child benefit should be restored to \$35/month to bolster the child food package and encourage ongoing retention.

USDA should also shift implementation of the 2017 NASEM Report's recommendation on 100% fruit juice to eliminate default juice issuance in WIC and instead provide juice only as a substitution to additional CVB value (\$3 of CVB for 64 ounces of 100% fruit juice).

With these changes, NWA recommends that CVB levels be set at \$38/month for children, \$46/month for postpartum participants, and \$50/month for pregnant and breastfeeding participants.

PROTEIN FOODS

WHAT IS THE PROTEIN ROTATION RECOMMENDED BY THE 2017 NASEM REPORT?

Seafood is only currently provided to fully breastfeeding participants (2.8% of all WIC participants). In alignment with dietary guidance, the 2017 NASEM Report recommended expanding seafood options across child and adult food packages. Due to cost constraints, the 2017 NASEM Report could not provide seafood every month and instead proposed a rotation with peanut butter and legumes to offset costs. The 2017 NASEM Report recognizes that these three foods are not nutritionally interchangeable and that a rotation may add to perceptions of administrative burden.

HOW CAN DEPARTING FROM COST-NEUTRALITY IMPACT THE PROTEIN ROTATION?

With additional investment, seafood can be introduced as a standalone food group to all child and adult food packages. This step would accomplish the important goals of the 2017 NASEM Report to improve balance across food groups, promote consistency with the DGAs, and introduce an underconsumed food into the diets of WIC participants, while also bolstering the value of the WIC benefit, honoring cultural eating patterns, and avoiding the administrative burden of a protein rotation. With seafood as a standalone food group, peanut butter and legume issuance would remain unchanged from current patterns.

WHY IS INTRODUCING SEAFOOD TO WIC IMPORTANT?

The 2020-2025 DGAs specifically recommends seafood intake during pregnancy and lactation, noting the favorable associations with cognitive development in young children. Seafood is also underconsumed across age groups, along with key food groups like vegetables and whole grains. WIC can improve developmental outcomes, increase consumption patterns, and encourage lifelong taste preferences by introducing seafood to WIC participants.

IS SEAFOOD SAFE FOR WIC PARTICIPANTS?

Some seafood options contain high levels of methylmercury, a heavy metal that can be harmful to brain development and nervous system function. The Food and Drug Administration (FDA) and the Environmental Protection Agency (EPA) issue joint guidance on seafood consumption, noting that fish lowest in methylmercury include a wide range of popular options, including salmon, light tuna, Atlantic mackerel, scallops, catfish, tilapia, flounder, crab, sardines, and anchovies.

WHAT OTHER PROTEIN FOODS WOULD BENEFIT FROM INCREASED INVESTMENT?

Fruits, vegetables, and seafood are the food groups issued at the lowest levels relative to DGA-recommended intake. The next-lowest food group is meat/poultry/eggs, which currently provides only 14% of recommended intake to WIC-enrolled children. Eggs are often a higher-redeemed food group, along with infant formula and the CVB for fruits and vegetables. Despite the NASEM review's guiding principles, the 2017 NASEM Review did not recommend increased issuance for eggs or the introduction of other meat and poultry options to increase consumption of this food group.

Additional value could support different package sizes for eggs, including 18-count packages. WIC should also account for the rising cost of eggs, especially as states enact cage-free-only laws that shape retailer stocking practices.

WIC has never included meat options, largely due to cost constraints. Leaner options, such as canned chicken, could align with nutrition standards and improve balanced options across food groups.

WHOLE GRAINS

WHY DOES WIC EMPHASIZE WHOLE GRAIN INTAKE IN THE WIC FOOD PACKAGES?

The DGAs call for healthy diets to include whole grains and limit refined grains, to ensure intake of key nutrients like iron, dietary fiber, and B vitamins like folic acid. Whole grains are one of the food groups underconsumed across all age categories, with 98 percent of Americans falling below recommended intake. Meanwhile, 74 percent of Americans exceed limits for refined grain consumption. These trends are even more present in the WIC population.

WIC's food benefit is supplemental and targeted to food groups that can deliver priority nutrients. As the DGAs recommend that at least half of all grains consumed should be whole grains, the 2017 NASEM Report encourages an increased focus on whole grains in WIC issuance to bolster whole grain intake among the WIC population.

HOW WOULD THE 2017 NASEM REPORT ENHANCE ACCESS TO WHOLE GRAINS?

The 2017 NASEM Report would expand package size options for whole-wheat breads to assure a greater selection on the grocery store shelf, expand approved grain options to accommodate for cultural eating patterns, and require all breakfast cereals to meet the whole grain-rich standard utilized in the school meals programs and the Child and Adult Care Food Program (CACFP).

HOW WOULD THE 2017 NASEM REPORT ADJUST ISSUANCE OF BREADS?

WIC-approved breads must currently be provided as a one-pound loaf, even though retail grocers more commonly stock two-pound loaves. The 2017 NASEM Report would incentivize increased whole grain consumption by offering a wider range of options, allowing WIC participants to redeem loaves of bread within a range of 16 to 24 ounces. These expanded package sizes would extend to substitution options, including oatmeal, brown rice, barley, corn tortillas, whole wheat tortillas, and whole wheat pasta.

The 2017 NASEM Report would also specify that breads must be 100% whole wheat, requiring that whole grain wheat be the primary ingredient by weight. This move would eliminate a rarely-used exception to authorize whole-grain breads, which are not required by the FDA to meet a minimum threshold of whole grains. This move will reduce participant confusion and assure whole grain intake without reducing availability of options on the shelf.

WHAT NEW GRAIN OPTIONS WOULD BE AVAILABLE TO SUPPORT CULTURAL EATING PATTERNS?

The 2017 NASEM Report recommends including fortified corn masa flour, cornmeal, teff, and buckwheat as grain substitution options. These additional options expand the cultural relevance of the WIC food package, and USDA can build an even more expansive list to account for the diverse population of WIC families. All new cultural options would have to meet the 100% whole grain standard, with the exception of corn masa flour, which must align with FNS standards for tortillas and be fortified with folic acid.

WHY IS CEREAL A SEPARATE FOOD GROUP?

WIC-approved breakfast cereals are fortified with priority nutrients for the WIC population, including folate and iron. Other whole grain foods, like whole wheat breads and pastas, are not required to be fortified with these key nutrients. The 2017 NASEM Report recognized that keeping fortified cereals as a distinct category would encourage WIC participants to consume a versatile product that can deliver whole grains, folate, and iron through one product.

WHAT IS A WHOLE GRAIN-RICH CEREAL?

The 2017 NASEM Report would update the whole grain standard for breakfast cereals to align with CACFP and the school meals programs. WIC cereals would now be required to be whole grain-rich, meaning that at least half of the grains in cereal must be whole grains and any remaining grains must be enriched. WIC cereals would *not* be required to be 100% whole grain.

WHY DOES THE 2017 NASEM REPORT RECOMMEND REQUIRING ALL CEREALS TO MEET THE WHOLE GRAIN-RICH STANDARD?

Echoing the DGAs, the 2017 NASEM Report prioritized whole grain consumption among the WIC population. Breakfast cereals are fortified with priority nutrients like iron and folate, but the 2017 NASEM Report did not find a substantive difference in fortification between cereals that are currently identified as whole grain and those that did not. As WIC is a supplemental benefit, the 2017 NASEM Report decided to maximize the nutritional benefit of breakfast cereals, ensuring that participants could receive the benefits of whole grain, iron, and folate intake through whole grain-rich cereals. The 2017 NASEM Report's intention to leverage breakfast cereals as a driver of whole grain intake requires that all breakfast cereal options meet the whole grain-rich definition.

The 2017 NASEM Report reviewed current marketplace options and determined that there were adequate varieties of whole grain-rich cereals available on the shelf, including multiple gluten-free options.

DAIRY

HOW DOES THE 2017 NASEM REPORT ADJUST THE DAIRY SUBSTITUTION PATTERN?

Under the current food packages, milk can be substituted for limited amounts of cheese, yogurt, tofu, and soy-based beverages. The 2017 NASEM Report would provide three substitution options to promote full redemption of the dairy benefit - one pound of cheese and one quart of yogurt could be substituted for four quarts of milk; two quarts of yogurt could be substituted for two quarts of milk; and, for fully breastfeeding participants, two pounds of cheese can be substituted for six quarts of milk.

The new substitution patterns are informed by redemption patterns, indicating that milk may not be the preferred form of dairy, particularly for adults. The substitution pattern also accounted for the "dangling quart," ensuring that participants do not have to purchase difficult-to-find and more expensive options.

HOW DOES THE 2017 NASEM REPORT ADJUST YOGURT PACKAGE SIZES?

Current specifications require yogurt to be redeemed in package sizes that add up to 32 ounces exactly. This requirement has inhibited State WIC Agencies from authorizing single-serve containers that are more convenient for parents and readily accessible on the shelf. The 2017 NASEM Report recommends allowing for a range of package sizes that add up to between 30 to 32 ounces, including popular single-serve sizes like 5.3 and 6 ounces. This straightforward reform will improve the shopping experience while assuring participants have access to quantities consistent with recommended intake.

WHAT ARE CALORIES FOR OTHER USES?

The 2017 NASEM Report recognizes that the current WIC food packages provide close to or above the DGA limit for calories for other uses, which can include sodium, added sugars, and saturated fats. Stricter limitations on calories for other uses is one of the biggest differences between the 2015 and 2020 editions of the DGAs, which only underscores the 2017 NASEM Report's recommendations on limiting intake of added sugars and saturated fats.

HOW DOES THE 2017 NASEM REPORT LIMIT CALORIES FOR OTHER USES IN DAIRY?

As part of the 2009 food package changes, WIC-approved dairy was limited to low- and non-fat options to reduce saturated fats. The 2017 NASEM Report maintains this balance, an approach validated by the decision of the 2020 edition of the DGAs to even further limit calories for other uses. The 2017 NASEM Report goes even further to require milk be unflavored, reducing a potential source of added sugars and promoting alignment with milk options available in CACFP.

The 2017 NASEM Report calls for a stricter limit on total sugars in yogurt, reducing the upper limit from 40 grams per 8 ounces to 30 grams. This shift likewise promotes alignment with CACFP nutrition standards and builds on reformulations in the yogurt industry.

Dairy can be substituted for soy options, with some soy products having high rates of added sugars. The 2017 NASEM Report proposes a limitation on total sugars in soy beverages of 12 grams per 8 ounces, to mirror naturally occurring sugars in cow's milk.

INFANT FOODS

HOW DOES THE 2017 NASEM REPORT ADJUST INFANT FOOD OPTIONS?

Current WIC food packages provide three forms of infant foods issued starting at six months: infant cereals, jarred infant vegetables and fruits, and jarred infant meats. Infant foods are some of the least redeemed foods, and there are few flexibilities to accommodate other developmentally appropriate feeding options.

The 2017 NASEM Report would address this challenge by introducing new substitution options. Jarred infant vegetables and fruits could be swapped out for additional Cash Value Benefit, allowing parents to prepare homemade infant foods with developmentally appropriate textures. Infant vegetables and fruits could be substituted for any form, including frozen and canned. Current substitutions are more limited and can only swap out for fresh produce.

Jarred infant meats could also be substituted for canned seafood, addressing iron and zinc intake at a critical stage of development.