National WIC Association

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Allison Post
WIC Administration, Benefits, and Certification Branch
Policy Division, Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place, 3rd Floor
Alexandria, VA 22314

RE: RIN 0584-AE82
Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Revisions in the WIC Food Packages. Proposed Rule.

Dear Ms. Post:

The National WIC Association (NWA) is the non-profit education arm and advocacy voice of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), the 6.4 million mothers and young children served by WIC, and the over 10,000 service provider agencies who are the frontlines of WIC's public health nutrition services. For more than two decades, NWA has worked to promote alignment between WIC food package issuance and the Dietary Guidelines for Americans (DGAs) to strengthen health and nutrition outcomes for WIC participants. NWA applauds the U.S. Department of Agriculture (USDA) for their work to advance this proposed rule and appreciates this opportunity to comment on proposed updates to the WIC food packages.

As a complement to WIC's individualized nutrition counseling and breastfeeding services, the WIC food packages enhance health outcomes by delivering priority nutrients through electronic benefits for healthy supplemental foods at critical stages of growth and development. Four prior food package revisions – in 1980, 1992, 2007, and 2014 – increasingly enhanced WIC's public health results by further aligning benefit issuance with the DGAs, strengthening nutrition standards for WIC-approved products, and shifting WIC's focus to support breastfeeding outcomes. WIC's role in enhancing access to nutritious foods and educating participants on healthy shopping patterns has clear results, including healthier birth outcomes[1] and reductions in childhood obesity among WIC-enrolled toddlers.[2]

NWA raises our voice in strong support of USDA's proposed updates to the WIC food packages. These science-based revisions reflect expert consensus from the thorough review of the National Academies of Sciences, Engineering, and Medicine (NASEM) and wisely departs from cost-neutrality to increase participant access to nutritious foods. USDA's proposals will enhance WIC's life-saving nutrition intervention that works to both ameliorate child hunger and build the foundation of healthy eating for millions of participants nationwide. On behalf of NWA's membership of State and local WIC providers across the country, we offer the following comments to inform USDA's deliberations ahead of a final rule that will ideally translate to healthier outcomes for America's next generation.

## Science-Based Review Process

WIC's documented public health outcomes are attributable to the scientific foundation of the WIC food packages. Congress has repeatedly instructed that USDA rulemaking on the WIC food packages should incorporate independent scientific advice and reflect the latest nutrition science, public health concerns, and cultural eating patterns.[3] In advance of the 2007 rulemaking (implemented in 2009 and hereafter referred to as the "2009 food package changes"), USDA contracted with the National Academies' Institute of Medicine to evaluate the WIC food packages and make independent recommendations.[4] USDA's subsequent rulemaking relied heavily on the Institute of Medicine report, which had outlined the dietary impacts of introducing new food groups like fruits, vegetables, and whole grains as part of the WIC food packages.[5] The success of the 2009 food package changes informed a new statutory requirement that the WIC food packages be reviewed every decade in the Healthy, Hunger-Free Kids Act of 2010.[6]

In advance of the current rulemaking, USDA contracted with NASEM to conduct a thorough review of the post-2009 food packages, which was completed in January 2017 with publication of a more-than-1,000 page report.[7] The 2017 NASEM Report, titled *Improving Balance and Choice*, made a series of recommendations that sought to align WIC's food packages with the 2015-2020 DGAs by "designing packages that were balanced across the food groups and supplemental in amount."[8] This approach recognized that WIC's limited resources needed to be strategically deployed across food groups to maximize intake of priority nutrients and set the stage for WIC participants to further integrate nutritious foods into their overall eating patterns.

The 2017 NASEM Report was complemented by subsequent issuance of the 2020-2025 Dietary Guidelines for Americans, the first edition of the federal nutrition recommendations to include a life-stages approach that accounts for pregnancy, lactation, and infancy.[9] The 2020-2025 DGAs were largely consistent with the 2015-2020 DGAs that formed the foundation for the 2017 NASEM review. The 2020-2025 DGAs reiterated several key recommendations that impact WIC food package design, including choosing whole grains for more than half of all grains consumed and prioritizing whole fruit over fruit juice.[10] The 2020-2025 DGAs incorporated longstanding medical guidance that emphasizes exclusive human milk feeding for the first six months of life[11] and underscored the health benefits of seafood for WIC's target population – including pregnant and lactating women and young children.[12] Although intake recommendations were largely consistent, the most significant departure from the 2015-2020 DGAs was a call for lower intake of Calories for Other Uses (COUs), reaffirming WIC's efforts to limit intake of saturated fats, added sugar, and sodium.[13]

**NWA strongly endorses the science-based review process and is encouraged by USDA's adherence to independent scientific recommendations in the proposed rule.** Thoughtful and comprehensive review of the WIC food packages by independent experts ensures that USDA rulemaking is best positioned to support the nutritional needs of participants and strengthen their dietary quality through healthy WIC foods. Departures from NASEM's recommendations should either be consistent with NASEM reasoning or complemented by intervening dietary guidance such as the 2020-2025 DGAs.

## Enhancing the WIC Food Packages

Especially after the 2009 food package changes were implemented, the modest value of WIC's food packages had a demonstrated impact on dietary quality and shopping behaviors – resulting in increased consumption of fruits, vegetables, whole grains, and low-/non-fat dairy products.[14] These

demonstrable changes that improve nutrition security for WIC families are accomplished with an average WIC benefit of only $42.39 between 2010 and 2022.[15] In 2021, the average WIC benefit accounted for only 8.1 percent of average consumer expenditures on groceries.[16]

Prior updates to the WIC food packages, also having been cost-neutral, diminished the purchasing power of WIC families over time. When WIC was established in the 1970s, a monthly benefit would supply approximately $20 of supplemental foods across four adult/child categories (milk/cheese, cereal, juice, and eggs).[17] According to the Bureau of Labor Statistics, if the WIC food packages had been adjusted for annual inflation to maintain the same purchasing power as the 1970s food packages, the total value of the food benefit would be over $100/month today.[18] Not only does the current food package fall short of that amount, but it is spread thinner across eight adult/child food categories. The addition of new food categories like the Cash Value Benefit and whole grains as part of the 2009 food package changes were not supplemented with additional value and instead came at the expense of access to other supplemental foods.

**NWA is strongly supportive of targeted departures from cost-neutrality to strengthen the nutritional quality and value of the overall WIC benefit.** Although WIC is a discretionary program focused on delivering a supplemental nutrition intervention, WIC has a substantial record of reducing federal healthcare costs in both the short- and long-term.[19] Additional investment in the WIC food packages could amplify WIC's public health impacts by further boosting intake of nutritious foods and strengthening healthy eating patterns early in life. As policymakers assess measures to reduce healthcare expenditures related to chronic diet-related disease – which accounts for more than 15 percent of all Medicare and Medicaid spending[20] – modest investments in the annual WIC appropriation to support a more robust WIC food package is an essential and effective step in fostering improved public health.

As the 2017 NASEM Report sought to enhance WIC's role in improving dietary quality, its review was significantly challenged by a charge of developing cost-neutral recommendations.[21] For example, the 2017 NASEM Report identified actionable targets of delivering 50 percent of recommended fruit and vegetable intake, which would have accounted to $23/month for children and $41-45/month for women.[22] With cost-neutral limitations, the 2017 NASEM Report could only recommend a fraction of that amount - $12/month for children and $15-35/month for women.[23] As a result, the 2017 NASEM Report specifically cited higher benefits for fruits and vegetables as a top priority should increased funding be available.[24] Other nutritionally important recommendations like the addition of seafood could not be adequately funded, resulting in an administratively complex recommendation to rotate seafood, legumes, and peanut butter each quarter.[25]

There is no statutory requirement that WIC food package reviews must be cost-neutral, with USDA given broad discretion to determine the supplemental foods made available through the WIC food packages.[26] With USDA not acting immediately on the 2017 NASEM Report, Congress drew on the report's logic to authorize a temporary increase to the Cash Value Benefit for fruits and vegetables in the American Rescue Plan Act of 2021.[27] This increase was subsequently sustained in bipartisan appropriations legislation, with fruit and vegetable issuance now set to reflect the 2017 NASEM Report's target of 50 percent of DGA-recommended intake, as adjusted for inflation.[28]

These efforts by Congress had an immediate impact on nutritional intake and participant satisfaction after being implemented nationwide in June 2021. In fall 2021, in a study involving over 10,000 WIC participants across 5 State agencies, the National WIC Association and Nutrition Policy Institute measured a ¼ cup per day increase in fruit and vegetable consumption WIC-enrolled toddlers.[29] There was a substantial shift in participant perceptions of benefit inadequacy, with 76

percent of WIC participants believing the Cash Value Benefit was "not enough" before the increase and only 25 percent reiterating that view after the benefit increases.[30] 14 percent of participants suggested they would exit from WIC if the benefit amounts went down.[31] With Congress sustaining the elevated benefit, nationwide WIC participation has increased 4 percent between June 2021 and October 2022 (the most recently available month), suggesting that higher benefits could be associated with increased participant retention.[32]

**Boosting Consumption in Critical Food Groups**

USDA's proposed rule reflects the approach recommended by the 2017 NASEM Report to restructure the WIC food packages to be "balanced across the food groups and supplemental in amount."[33] Current WIC food packages include a wide range of benefits issuance, with some food groups containing critical nutrients (*e.g.*, seafood) not even being issued when other food groups (*e.g.*, juice, dairy, peanut butter, legumes) are issued in excess of DGA-recommended intake in some food packages. **NWA supports USDA's approach to balance issuance across food groups and provide increased flexibility as a strategy to boost overall consumption of food groups rich in priority nutrients.**

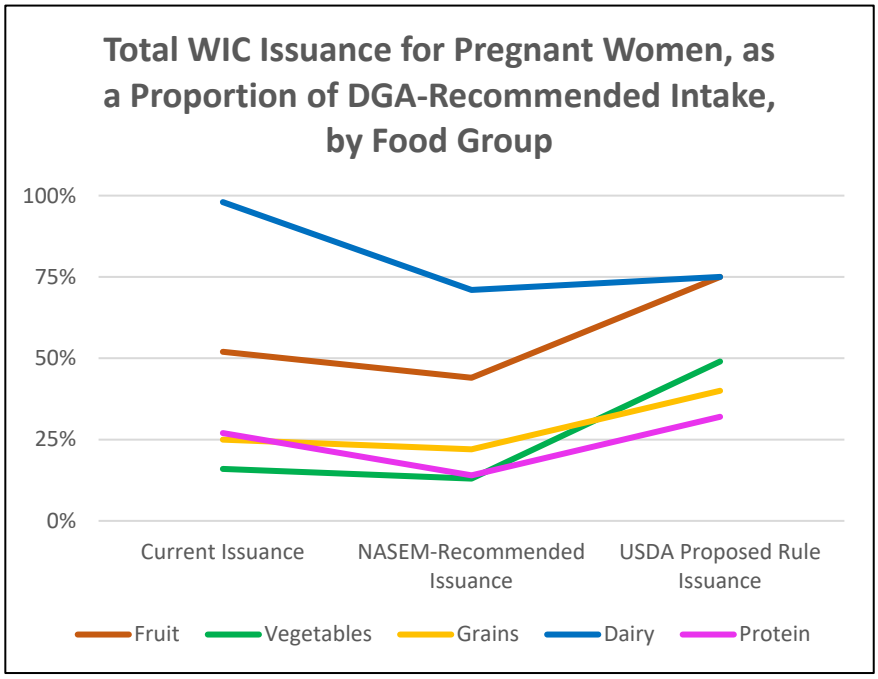
The 2020-2025 DGAs recognize that the general population falls short of recommended intake across several critical food groups, including fruits, vegetables, and dairy.[34] These trends manifest differently in WIC's target population, with the DGAs noting that a slightly higher proportion of toddlers meet recommended fruit intake (approximately 40 percent, compared to 20 percent of the total population) and that average dairy intakes "generally exceed[s] recommended amounts in the [toddler] age group."[35]

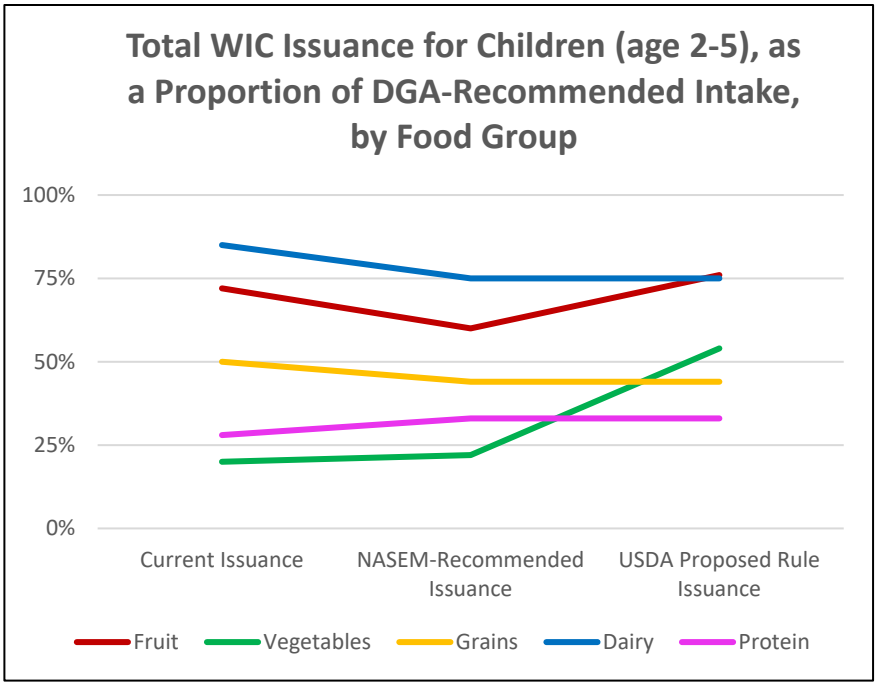
Although both the general population and the specific life-stages of WIC's target population largely meet recommended grain and protein food intake, the DGAs note that intake is imbalanced and contrary to DGA guidance. For grains, where the DGAs have consistently recommended that half of grain consumption should be whole grains, 98 percent of the general population does not consume enough whole grains, whereas 74 percent exceed recommended limits on refined grain intake.[36] For protein foods, meats are consumed in higher proportion, but 90 percent of the population falls short of recommended seafood intake.[37]

Trends identified in the DGAs are consistent with NASEM's independent analysis of the WIC-enrolled population. The 2017 NASEM Report similarly identifies that a majority of WIC participants fall short of DGA-recommended intake across several key groups. For WIC-enrolled children, 100 percent fall short of seafood recommendations, 99 percent fall short of vegetable recommendations, and 93 percent fall short of whole grain recommendations.[38] Similarly, for WIC-enrolled pregnant women, 100 percent fall short of whole grain recommendations and 99 percent fall short of vegetable recommendations.[39]

Although many of these intake gaps are consistent throughout the population, **USDA should be mindful of entrenched disparities in consumption patterns that disproportionately impact communities of color.** For example, the Centers for Disease Control and Prevention (CDC) identified that Hispanic adults consume fewer whole grains than other racial and ethnic groups, with only 11 percent of Hispanic adult grain intake coming from whole grains compared to 17 percent of white adult grain intake.[40] USDA analysis of NHANES data suggest that similar disparities exist for Hispanic children, with Hispanic toddlers consuming only 23 percent of DGA-recommended whole grain intake compared to 34 percent for white toddlers.[41]

Higher incidence of allergies and food intolerances in communities of color also shape consumption patterns. For example, USDA estimates that Black toddlers consume approximately half the amount of dairy compared to white toddlers,[42] which is likely correlated to the higher rates of lactose intolerance among Black individuals.[43] Similarly, Black and Hispanic individuals are overrepresented among those with peanut allergies,[44] which may account for significantly lower consumption in the nuts, seeds, and soy food group.[45] USDA's proposal is responsive to the disproportionate rates of food allergies and intolerance across WIC's diverse population, including new substitution patterns and a pathway for nutritionally equivalent plant-based alternatives to assure greater participant choice without sacrificing delivery of priority nutrients.




Informed by the science-based recommendations, USDA's proposed rule promotes greater balance across food categories to target WIC's limited resources at closing intake disparities and building nutrition security and equitable access to healthy foods. In total, USDA's proposed updates largely either accord with NASEM's recommended issuance or exceeds NASEM recommendations with thoughtful departures from cost-neutrality.

Across the food packages, USDA's updates would generally issue dairy and fruits in amounts that bring participants closer to three-quarters of DGA-recommended intake, issue vegetables in amounts that bring participants closer to approximately half of DGA-recommended intakes, and issue grains and protein foods in amounts that bring participants closer to one-third of DGA-recommended intakes.[46] These proposed changes provide greater balance by narrowing the gap in issuance between food groups and through USDA's departures from cost-neutrality, such as monthly issuance of seafood across food packages and the permanent increases to the Cash Value Benefit.

Even with these departures from cost-neutrality, WIC issuance would still fall below half of DGA-recommended intake in several food categories and subgroups – including whole grains and protein food (notably, seafood and eggs). NWA has previously indicated support for including canned chicken to increase total protein foods and introduce even further diversity to the food package,[47] and the inclusion of these products should be considered in a future scientific review.

Consistent with the reasoning of the 2017 NASEM Report, USDA proposes a series of changes in issuance and flexibility within food categories to promote access to priority nutrients through core food groups:

- **Fruits and vegetables.** USDA's proposed updates would make permanent the temporary increases in WIC's Cash Value Benefit (CVB),* a monthly value that provides resources to redeem a broad range of fruits and vegetables. USDA proposes setting the monthly Cash Value Benefit amounts at $24 per month for child participants, $43 per month for pregnant and postpartum participants, and $47 per month for breastfeeding participants, with annual adjustments for inflation.[48] **NWA is strongly supportive of codifying the increases for fruits and vegetables.**

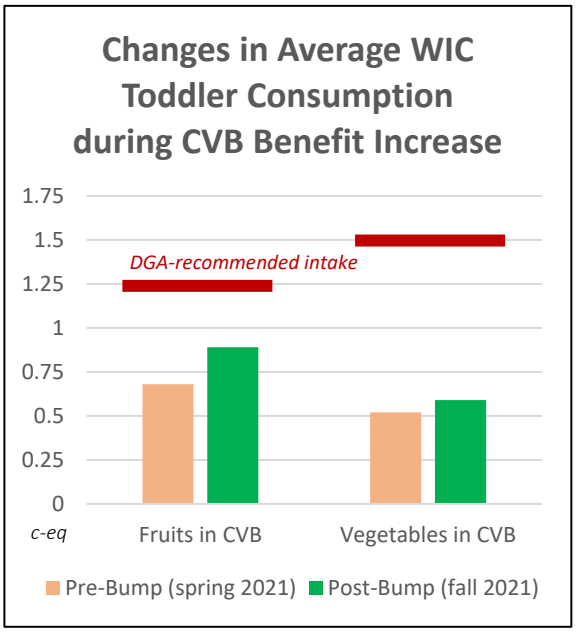
  Introduced as part of the 2009 food package changes, the CVB is the most versatile element of the overall WIC benefit – providing a greater range of product choice and simplifying the shopping experience for WIC participants. CVB has consistently been one of the most redeemed elements of the WIC food package, with NWA-compiled redemption data indicating that CVB is now the most redeemed element of the food package outside of infant formula.† In addition to promoting healthier eating patterns in alignment with the DGAs, NASEM prioritized increased CVB to ensure priority nutrient delivery for WIC participants – including potassium, fiber, folate, magnesium, vitamin A, vitamin C, and copper.[49]

  Although CVB has been associated with increasing WIC participant consumption of fruits and vegetables,[50] average intake remains below DGA recommended levels for both WIC-eligible individuals and the general population. As overall issuance is increased to address these intake gaps, the proposed changes are critical in reversing the imbalance between CVB and juice issuance to accord with the DGA recommendation that at least 50 percent of fruit consumption should come from whole fruit.[51] Under prior regulations, juice accounted for 59 percent of WIC's total fruit issuance; USDA's proposals will flip that balance to prioritize whole fruit with 72 percent of fruit issuance tied to the CVB and only 28 percent of fruit issuance drawing from the juice benefit. This new balance that strongly favors whole fruit is consistent with WIC's supplemental structure, as exceeding the DGA-recommended balance within WIC issuance strategically leverages WIC's limited resources and makes it likelier that whole fruit consumption will be prioritized across an individual participant's total diet pattern (including foods purchased with non-WIC dollars).

  In its review, NASEM highlighted the disproportionately lower rate of vegetable purchasing and consumption both within the CVB and in overall dietary patterns, especially compared to fruits.[52] CVB's structure and design necessitates that one common cash value be shared across both the fruit and vegetable food groups. Having one consistent value for fruits and

* The USDA proposed rule uses the term "Cash-Value Voucher," but NWA encourages USDA to update terminology throughout the regulations to "Cash Value Benefit" to reflect the program-wide transition to electronic benefits technology.

† For more information on NWA-compiled redemption data, see the Appendix.




vegetables streamlines product selection for participants and reduces overall barriers in navigating the shopping experience and processing transactions at check-out. As a result of the combined cash value, USDA's proposals rightfully result in a higher rate of fruit issuance (76 percent for children) to reach the NASEM-recommended target of 50 percent issuance in the vegetable food group.

Since the temporary CVB bump was implemented nationwide in June 2021, WIC participants immediately demonstrated changing consumption patterns. In a fall 2021 survey, the National WIC Association and Nutrition Policy Institute assessed that WIC participants registered an average 1/3 cup per day increase in total fruit and vegetable consumption and an average 1/4 cup per day increase when isolating for fruits and vegetables delivered through CVB purchases (*e.g.*, excluding juice, legumes, and fried potatoes).[53] These shifts bring WIC toddlers 17 percentage points closer to reaching DGA- recommended fruit intake and 5 percentage points closer to reaching DGA-recommended vegetable intake.

In addition to improving purchasing and consumption, added CVB value is also associated with positive changes to WIC participants' shopping patterns. With added value, WIC participants report a greater variety of purchases, now having the resources to experiment with new types of fruits and vegetables.[54] Increased dietary variety is particularly critical for WIC-enrolled children, as taste preferences are being formed in early childhood[55] and exposure to a broad range of fruit and vegetable types (*e.g.*, taste, texture, etc.) can build the foundation for healthier lifelong preferences. Added CVB value is also associated with increased frequency of fruit and vegetable shopping occasions over the course of the month, resulting in more consistent access to fruits and vegetables, spillover purchases at more frequent grocery store visits, and resolving some challenges for rural participants where stores may have limited or inconsistent stocking of fruits and vegetables.[56]

To best align with NASEM recommendations, NWA urges USDA to recalculate the benefits for pregnant participants. When setting targets for CVB issuance to reflect 50 percent of DGA-recommended intake, NASEM employed three diet patterns: 1,300-kcal diets for children, 2,300-kcal diets for postpartum participants, and 2,600-kcal diets for pregnant and breastfeeding participants.[57] In implementing the CVB increases under bipartisan appropriations laws, USDA has not adequately justified the departure for pregnant participants, who have instead been issued amounts that reflect 2,300-kcal diet patterns. NWA urges USDA to honor the science-based NASEM recommendations and set pregnant CVB issuance at the same rate as breastfeeding participants.

Consistent with NASEM recommendations, NWA supports USDA's proposal to annually adjust the value of CVB and substitutions for CVB to account for inflation. However, NWA urges USDA to adjust its method of calculation to round up or down to the nearest dollar. As WIC has historically only rounded down to the nearest dollar, the value of CVB has typically lagged inflation and consistently shortchanged participants over time. Over the course of fourteen years between USDA's promulgation of the 2007 interim rule and implementation of the CVB bump in 2021, the CVB had only increased by $1 across the adult food packages

(the child CVB was increased in the 2014 final rule, but similarly only increased by $1 through USDA's inflation adjustments). Rounding up or down to the nearest dollar would ensure a more accurate CVB value over time and protect against the erosion of WIC participants' purchasing power. This approach is consistent with Supplemental Nutrition Assistance Program (SNAP) regulations, which round up values in multiple areas.[58]

- **Seafood.** Currently, seafood is only issued in the fully breastfeeding package, reaching slightly more than 3 percent of WIC participants.[59] USDA's proposals would broadly increase availability of seafood across the child and adult food packages, reaching at least 59 percent of WIC participants and up to approximately 78 percent of participants if one-year-old children are able to access seafood.[60] **NWA is strongly supportive of introducing seafood across the WIC food packages, reflecting the 2020-2025 DGAs' clear guidance to elevate seafood consumption among WIC's target population.[61]**

  The 2020-2025 DGAs generally recommend increased seafood consumption to provide greater variety within the protein foods group, expressly noting that prioritizing seafood could reduce intake of saturated fats and sodium.[62] In its first-ever life-stages review, the DGAs spotlight the health benefits of seafood for WIC's target population – noting that seafood consumption during pregnancy is associated with favorable measures of cognitive development in young children[63] and that seafood rich in heme iron and omega-3 and -6 fatty acids should be introduced to infants starting at six months to support brain and neurologic development and immune function.[64] Some types of seafood, especially salmon, are also natural sources of vitamin D, a priority nutrient for the WIC population.[65]

  Amid these varied health benefits, the DGAs caution WIC's target population to limit exposure to methylmercury.[66] Shortly after promulgation of the latest edition of the DGAs, the Food and Drug Administration (FDA) and Environmental Protection Agency (EPA) updated their joint guidance that includes a "Best Choices" list.[67] The FDA/EPA "Best Choices" list includes options that are currently issued by WIC agencies – such as Atlantic mackerel, salmon, sardines, and canned light tuna – as well as other seafood that may be readily available to WIC shoppers in canned or pouch form, such as anchovies, clams, cod, crab, herring, and oysters.[68]

  The addition of seafood is the only increase in protein foods proposed by USDA, with the child food package slightly increasing from 28 percent of DGA-recommended intake for total protein foods to 33 percent.[69] Total protein foods would remain the lowest-issued of the five broader food groups across the food packages.[70] Additional seafood issuance beyond what USDA has proposed would be in alignment with NASEM's overall approach. If children were issued 10 ounces instead of 5 ounces, seafood issuance would align with nearly half of DGA-recommended intake. USDA also proposes reducing the amounts issued to fully breastfeeding women to align with WIC's supplemental structure, as the current 30 ounce issuance amounts to 70 percent of DGA-recommended intake.[71] NWA instead urges USDA to maintain the 30 ounce issuance at current levels, which would remain within supplemental ranges while strengthening the value of the fully breastfeeding package, complementing USDA's efforts to enhance breastfeeding outcomes through the food packages.

  USDA's proposals are likely to elevate the WIC market's profile within the seafood industry, providing a strategic opportunity to partner with industry in developing package sizes suitable for infant and young child consumption. The proposed rule raises several inquiries

about current marketplace availability. Package sizes and marketplace availability can impact whether USDA authorizes light tuna for children, any seafood for one-year-olds, seafood as a substitution option for six- to eleven-month infants, and additional seafood varieties beyond Atlantic mackerel, salmon, and sardines.[72] **Instead of adopting strict limitations that exclude a variety of seafood options, NWA urges USDA to set package specifications in alignment with the DGAs and FDA/EPA guidance (*e.g.*, size, boneless, etc.) to create an ongoing pathway that will encourage industry innovation.**

This is especially critical for light tuna, which NWA estimates accounts for at least two-thirds of current seafood redemptions.* The 2020-2025 DGAs recommend light tuna for children (ages 1-8) consuming up to 2 ounces per week.[73] Other seafood varieties on the "Best Choices" list – including Atlantic mackerel, salmon, and sardines – are recommended for children consuming up to 3 ounces of seafood per week because they contain even lower methylmercury.[74] Manufacturers currently offer a selection of light tuna pouches at 2.5 ounces,[75] and creating a pathway for slightly smaller pouches on WIC Approved Product Lists could incentivize manufacturers to increase variety and availability – benefitting both WIC-enrolled children and the general shopping public. If light tuna or similarly situated seafood (*e.g.*, cod) was included in the child food package, WIC's nutrition workforce is equipped to educate participants on weekly spacing of 1 or 2-ounce pouches to reduce methylmercury exposure.

If USDA is unable to increase overall seafood issuance for children to 10 ounces, industry efforts to reconcile package sizes with the 2020-2025 DGAs and FDA/EPA guidance may benefit from setting child seafood issuance at 6 ounces. Although 6-ounce package sizes are not commonly available, it could serve as a more administrable Maximum Monthly Allowance (MMA) that would allow for different combinations of 2-ounce, 2.5-ounce, and 3-ounce pouches. As the DGA recommendations urge weekly spacing for young children and canned seafood, once opened, does not stay fresh for more than one week,[76] 5-ounce cans could be more prone to food waste and less administrable for families than smaller pouches that account for safe child consumption. This would encourage a broader range of industry innovation and enhance the accessibility of safe seafood products for children beyond the WIC-eligible population.

NWA is supportive of creating a pathway to substitute jarred infant meats for seafood. The 2020-2025 DGAs encourage introduction of iron-rich foods, including meats and seafood rich in heme iron, as early as six months.[77] Jarred infant meats are consistently the least redeemed element of the food package, with the 2017 NASEM Report noting redemptions at only 31 percent.[78] NASEM recommended that 10 ounces of jarred infant meats should be able to be substituted for 10 ounces of canned seafood.[79] NWA would urge USDA to include this substitution and maintain the same ratios, given NASEM's reasoning about infant meat package sizes and similar iron composition.[80] While this option may preference seafood that can be consumed at a rate of 2.5 ounces per week, NWA does not recommend a limitation that prohibits other "Best Choice" seafood. WIC's nutrition workforce is equipped to educate participants on weekly spacing and opportunities to maximize their seafood benefits, while also ensuring that an infant's overall iron needs are being met.

* Based on self-reported data from 16 State WIC Agencies, with a range of 51-90% and a mean of 79%. For more information, see Appendix.

- **Whole grains.** Since 2005, the DGAs have recommended that half of all grains consumed be whole grains.[81] Despite this longstanding dietary guidance, 98 percent of the general population does not consume enough whole grains and 74 percent continues to exceed recommended limits on refined grain intake.[82] In the current food package, only 19 percent of grains are whole grains.[83] NWA is supportive of USDA's thoughtful approach to rebalance the ratio of whole and refined grains across the food packages and boost overall whole grain consumption.

  Whole grains contain fiber – a priority nutrient for the WIC population – and a range of other vitamins, contributing to a lower risk of cardiovascular disease, diabetes, abdominal adiposity, and certain cancers.[84] The health benefits of whole grains stand in contrast to refined grains, which is associated with weight gain and increased risk of obesity.[85] As with other DGA recommendations that seek to promote balance within a single food category, WIC benefit issuance should at least align with the DGA recommendations. It would be appropriate for WIC to exceed DGA recommendations given the program's supplemental structure.

  Since whole grains were introduced to the WIC food packages as part of the 2009 changes, WIC has demonstrated success in boosting whole grain purchasing and consumption. Shortly after the 2009 food package changes were implemented, USDA estimated that WIC households purchased 10 percent more whole grains while reducing their refined grain purchases by 17 percent.[86] These shifts work to close dietary quality disparities across the WIC population, with WIC children consuming a higher proportion of their grains as whole grains (by nearly 6 percentage points) than higher-income children.[87]

  As NASEM sought to build on this progress and further close gaps in whole grain intake, a substantial barrier has been the package sizes requirements for WIC-approved whole grain breads. One-pound loaves of bread are less likely to be stocked and more expensive per ounce than larger package sizes, such as 22 to 24-ounce breads.[88] WIC-authorized retailers have reported that it is difficult to stock these "WIC-only" bread sizes, which results in reduced accessibility for WIC shoppers. In calling for a range of 16 to 24 ounces, NASEM proposed mild reductions to whole grain issuance (from 32 ounces) for children while boosting whole grain issuance for adult participants to ensure access to larger, more commonly available bread sizes.

  USDA's proposed rule goes beyond NASEM's recommendations to issue 48 ounces of whole grains across all adult food packages.[89] **NWA is strongly supportive of USDA's proposed increases to adult whole grain issuance.** The adult food packages will now deliver 63 percent of DGA-recommended whole grain intake, a marked improvement from the 22 percent in the current food packages[90] or even the 31 percent included in the NASEM recommendations.[91] Although nearly all adults fall short of DGA-recommended whole grain intake, Black and Hispanic adults consume the smallest proportion of whole grains relative to total grain intake.[92] This is largely due to systemic barriers in access to nutritious foods within and among communities of color. Enhanced access to whole grains through the WIC food package will foster nutrition security and tackle persistent intake disparities.

  Another promising step in improving acceptance and consumption of whole grains is through an expansion of eligible whole grain products, including culturally relevant foods like quinoa, teff, amaranth, blue corn meal, buckwheat, whole wheat pita, whole wheat bagels, and whole wheat naan.[93] USDA's proposed rule includes a significantly more

comprehensive list of cultural whole grains than proposed in the 2017 NASEM Report, including several foods elevated by NWA after conducting WIC staff and participant roundtables in spring 2021.[94] These cultural whole grain options will join existing choices in lieu of whole grain bread, including brown rice, bulgur, oats, whole grain barley, soft corn or whole wheat tortillas, and whole wheat pastas.[95]

Although the majority of whole grain redemptions have historically been whole grain breads, a broader range of whole grain choices could present challenges as children seek to redeem their full 24 ounce benefit. USDA should thoughtfully evaluate the landscape of 8 ounce package sizes for new and existing whole grain options to ensure that children have pathways to redeem their full benefit. Especially as the child food package still falls short of 50 percent issuance for total grains, NWA urges USDA to consider setting the child food package's MMA for whole grains at 32 ounces if relevant 8 ounce package sizes are not widely available.

- **Dairy and dairy alternatives.** Dairy is a critical food group for WIC participants and has consistently been one of the largest contributors to the WIC food packages, accounting for approximately 43 percent of WIC food costs (after infant formula rebates) in 2018.[96] Both the 2020-2025 DGAs and the 2017 NASEM Report identify priority nutrients for WIC's target population delivered through dairy products, including potassium, calcium, and protein, as well as vitamin D in fortified fluid milks.[97] Consistent with NASEM's independent recommendations, USDA's proposed rule seeks to strengthen participant access to these priority nutrients through a range of flexibilities within the dairy category.

  Dairy is, by default, issued to most participants as low/non-fat fluid milk to reflect DGA recommendations that have been in place since 1995.[98] Implemented in part in the 2007 interim final rule and then in full in the 2014 final rule,[99] WIC's reliance on low/non-fat dairy is an important strategy to reduce saturated fats.[100] Changes in WIC benefit issuance informed participant shopping behaviors, yielding healthier eating patterns that reduced consumption of higher-fat milks among WIC participants[101] and resulted in higher consumption of low/non-fat dairy when compared to non-participants.[102] The 2017 NASEM Report maintained the current limitations on milk fat content, consistent with the stricter recommendations on saturated fat intake and Calories for Other Uses (COUs) included in the 2020-2025 DGAs.[103] Consistent with the most recent edition of the DGAs and the independent NASEM recommendations, NWA supports maintaining the current limitations on milk fat content as detailed in the DGAs and NASEM recommendations.

  The 2017 NASEM Review identified a sharp disparity in low/non-fat milk redemptions, with children redeeming 71 percent of issued benefits compared to only 56 percent for adult participants.[104] While USDA data suggests that children generally consume more dairy than adults,[105] this disparity could also be informed by the significantly higher quantities of dairy issued across many adult food packages. Both the pregnant and mostly breastfeeding food packages currently issue 98 percent of DGA-recommended dairy intake, while the fully breastfeeding food package issues 119 percent of DGA-recommended intake.[106] Different rates of issuance across the adult food packages do not reflect the scientific foundation of the food packages, as the recommended intake of priority nutrients like calcium and the overall recommended adult intake for dairy do not vary based on pregnancy or breastfeeding status.[107] Cognizant of this disparity in redemption rates, NASEM predicted that its recommendation to align adult dairy issuance with the postpartum food package, included in USDA's proposed rule, would ensure that "the volume of milk redeemed in the

revised package will be similar to the amount currently redeemed."[108]

NASEM's reasoning is even more likely to hold given declines in redemption rates during the COVID-19 pandemic, with NWA's sample of 13 geographic State WIC Agencies (*see* Appendix) suggesting double-digit declines in redemption rates for low/non-fat fluid milk, whole milk (for one-year-olds), and cheese. Even assuming that dairy redemptions remained consistent with the 2017 NASEM Report, total dairy redemptions would account for only 81.6 percent of the issuance rates laid out by NASEM and included in USDA's proposed rule.[*] USDA's proposed adjustments would still ensure that dairy remains one of the most-issued food categories in proportion to the DGAs, with both child and adult food packages issuing 75 percent of recommended intake.[109]

USDA's proposed rule leans in on an equity-based approach outlined in the 2017 NASEM Report to strengthen intake of priority nutrients delivered through the dairy food group. USDA analysis of NHANES data identifies significantly lower dairy consumption among Black children and adults, with Black toddlers consuming approximately 57 percent of the dairy consumed by white children and Black adults consuming approximately 71 percent of the dairy consumed by white adults.[110] While Black individuals – in addition to Indigenous and Asian individuals – have higher prevalence of lactose intolerance,[111] the NASEM Report also noted that racial, ethnic, and cultural backgrounds could inform preference for alternatives to fluid milk.[112]

To strengthen cultural acceptance of the dairy food category, USDA's proposed rule would provide significantly greater flexibility in substitutions to fluid milk. USDA suggests a new substitution pattern allowing participants to substitute 2 quarts of milk for 2 quarts of yogurt and would remove an arbitrary barrier that forces participants to choose between dairy substitutions.[113] As a result, participants would now be able to swap out six quarts of milk to obtain the maximum substitution pattern of one pound of cheese, one pound of tofu, and two quarts of yogurt.[114] Fully breastfeeding participants would be able to swap out nine of their sixteen quarts of milk to obtain the maximum substitution pattern of two pounds of cheese, one pound of tofu, and two quarts of yogurt.[115] NWA is supportive of increased flexibility within the dairy category to maximize participant choice and accord with cultural and personal preference. Consistent with this goal, NWA is supportive of including drinkable yogurts that meet equivalent nutrient criteria within the food packages and would encourage USDA to adopt a broader range of cheese options, consistent with the types of cheeses that are highlighted in the Dietary Guidelines for Americans, to build cultural acceptance and relevance across the dairy category.

USDA's shift to introduce greater variety in the dairy category is inclusive of dairy alternatives that can support participants with allergies, lactose intolerance, or vegan diets. In addition to soy-based beverages already approved by the program, USDA proposes that nutritionally comparable soy-based yogurt and cheese alternatives be added to the program to promote variety.[116] Critical to the addition of these products would be calcium and protein specifications that ensure a comparable level of priority nutrients are being delivered. **NWA is supportive of creating an ongoing pathway for a broader range of nutritionally equivalent dairy alternatives – including beverages (*e.g.*, almond, oat) – to be added to the program.** The 2020-2025 DGAs notes that most plant-based beverages, except for soy, fall short of delivering equivalent nutritional quality as dairy products,

[*] For NWA's analysis on dairy issuance, see the Appendix.

particularly protein, calcium, and vitamin D.[117] However, industry efforts to innovate could yield nutritionally equivalent products before a future food package rulemaking. Given participant interest in plant-based dairy alternatives,[118] USDA should ensure there is a rolling pathway for nutritionally equivalent products to be approved.

**Building Healthier Eating Patterns**

In addition to increased access to nutritious foods through higher issuance and flexibilities within the food package, WIC can build healthier eating patterns by strengthening the nutritional quality of WIC-approved foods and aligning benefit issuance with nutrition education priorities.

- **Juice and whole fruits.** For the first 35 years of program administration, WIC issued benefits for 100% fruit juice but did not offer any whole fruit to participants.[119] This pattern contrasted with DGA recommendations that the majority of fruit intake should be whole fruit, and WIC's current issuance of 128 fluid ounces for one-year-old children remains at odds with the DGAs' explicit guidance that fruit juice is "not necessary" in the second year of life.[120] The American Academy of Pediatrics (AAP) recommends limiting juice to 4 ounces per day for toddlers, recognizing that overconsumption of 100% fruit juice could contribute to childhood obesity, tooth decay, and other adverse health outcomes.[121]

  WIC's role in consistently issuing 100% fruit juice throughout the program's history has shaped consumption patterns. WIC children are more likely to consume 100% fruit juice in excess of recommended limits[122] and more likely to be introduced to 100% fruit juice before recommended.[123] Higher juice consumption among WIC-enrolled toddlers is associated with reduced intake of milk,[124] and WIC issuance patterns may have exacerbated racial and ethnic disparities in 100% fruit juice intake, with Black and Hispanic children recording higher consumption compared to white children.[125]

  The 2009 food package changes reduced overall juice issuance and introduced the CVB, allowing participants to purchase whole fruits for the first time. This historic step started to correct an imbalance in WIC participants' consumption patterns, but more work must be done. As CVB benefit amounts have historically been low ($8-9/month for children), nearly 59 percent of fruit intake offered through the current child food package comes from 100% fruit juice.[126] Informed by NASEM's recommendation and lessons learned while implementing the CVB increase starting in 2021, USDA's proposed rule makes significant steps to curb 100% fruit juice consumption and prioritize whole fruit.

  USDA proposes reducing juice issuance to 64 fluid ounces per month for children, pregnant participants, and breastfeeding participants.[127] USDA would also eliminate juice in the postpartum food package. As a result, 100% fruit juice would only account for 28 percent of total fruit issued through the child food package and whole fruit, for the first time, would constitute a majority of total fruit issued (72 percent) in alignment with DGA recommendations.[128] NWA is supportive of the proposed reductions in 100% fruit juice issuance, which are consistent with WIC's supplemental structure and in accordance with longstanding DGA guidance to prioritize whole fruit consumption.

  To promote participant choice in accordance with the DGAs, USDA proposes that all 64 ounces of 100% fruit juice can be fully substituted for additional CVB value ($3/month).[129] Recent research indicates these changes would be popular with participants, as qualitative research indicates that WIC participants would like even more money for fruits and

vegetables[130] and would be interested in substituting 100% fruit juice for additional CVB.[131] **NWA encourages USDA to go one step further and flip the substitution pattern to direct initial fruit dollars to the CVB and allow 100% fruit juice as a substitution.** Instead of $24 per month (adjusted for inflation), children would be issued $27 per month in CVB and given the option to swap $3 of CVB for 64 ounces of 100% fruit juice. This modification to USDA's proposal would ensure that WIC participants have the same access to 100% fruit juice as intended in the USDA proposed rule. However, the change in incentive structure would better align with medical guidance and WIC nutrition education messages to support healthier eating patterns.

As USDA implements the 100% fruit juice substitution, NWA encourages USDA to modify its calculation for inflation adjustments to incorporate a round up model, as discussed in the prior comments on CVB. USDA should also consider whether a $3 base value appropriately reflects the nutrient density of swapping 100% fruit juice for whole fruit, or whether a higher base value would be in greater alignment with DGA recommendations.

- **Whole grains.** USDA's proposed rule seeks to address significant gaps in whole grain consumption among both the adult and child populations. As stated earlier in this comment, NWA is supportive of USDA's proposals to increase issuance for adult participants and offer a broader range of cultural grains. As USDA seeks to deliver more whole grains to child participants, the proposed rule contemplates new standards for WIC-approved cereals and breads. **NWA strongly supports USDA proposals to require WIC-approved products to meet more rigorous whole grain standards.**

  With limited resources, the WIC benefit has relied on foods that can deliver multiple priority nutrients to improve health outcomes for WIC participants. Earlier nutrition standards, such as an iron fortification requirement for ready-to-eat breakfast cereals adopted in the 1980 food package rule,[132] paved the way for industry innovation that resulted in healthier products offered to both WIC consumers and the broader shopping public.[133] In the 2006 scientific report ahead of the 2009 food package changes, the Institute of Medicine recommended that breakfast cereals align with a whole grain requirement to deliver both iron and whole grains to WIC participants.[134] In the 2007 interim final rule, USDA required that only half of WIC-approved cereals meet the whole grain standard.[135]

  In only requiring half of WIC-approved cereals to be whole grain, USDA only took the first step in tackling disparities in whole grain consumption. The DGAs recognize that cereal is the primary driver of whole grain intake for children in the general population,[136] but without a requirement that all cereals meet a whole grain standard, WIC participants could consume cereals that contain *no* whole grains and only meet the program's iron fortification requirement and total sugar limit. Especially as WIC is a supplemental program, issuance should either accord with or exceed DGA recommendations to account for non-WIC foods that a participant will purchase with additional household resources. For these reasons, NWA is strongly in support of requiring *all* cereals to meet the whole grain standard, as any other standard would undermine USDA's efforts in boosting whole grain intake, especially among children.

  The WIC market is better prepared to implement a whole grain standard today, as the availability and diversity of whole grain cereals has improved since 2007. Across four major brand-name manufacturers, NWA estimates that there were 54 ready-to-eat breakfast cereal products from 18 different brands that met WIC's iron fortification and total sugar

standards in 2022.* Of those 54 cereals, NWA estimates that 83 percent of the cereals (45 of 53) contain a whole grain as the first ingredient, inclusive of 15 of the 18 brands.[137] Among these whole grain cereals include six corn-based cereals, four rice-based cereals, and seven oat-based cereals.

In addition, at least three of the nine remaining non-whole grain cereals claim to include 14 grams of whole grains per serving, suggesting that mild reformulation could satisfy USDA's proposed standard.[138] Other non-whole grain cereal products have been reformulated to meet standards set by the school meals programs, but have not yet released whole grain varieties in a retail setting.[139] Requiring all WIC-approved cereals to meet a whole grain standard will encourage manufacturers to release whole grain varieties of the remaining cereals, improving availability of whole grain cereal products on the retail shelf.

Among the 44 whole grain cereals available, nine gluten-free cereals are on the market to accommodate participants with food allergies or sensitivities. None of the non-whole grain cereals are gluten free, largely because of the use of malt flavor or malted barley flour.[140] Whole grain, gluten-free cereals are inclusive of a range of cereal types, including corn, rice, and oat-based cereals.

At least ten State WIC Agencies – Oklahoma and nine Indian Tribal Organizations (ITOs) – have already voluntarily implemented a whole grain cereal standard as part of the 2009 food package changes. NWA compiled EBT redemption data from 2019 through mid-2022 from a sample of 13 geographic State WIC Agencies that represent approximately 28 percent of WIC's total caseload.† Over this time period, Oklahoma registered slightly lower redemption rates for cereal – 43.7 percent, compared to an average of 49.9 percent. However, Oklahoma also registered lower rates in other, more popular food categories, including eggs and the Cash Value Benefit.

As Hispanic families face the largest intake disparities for whole grains, it is a substantial public health success that Oklahoma records higher-than-average Hispanic cereal redemption rates. In a 14-month sample between January 2019 and March 2022, Oklahoma recorded a 20.8 percent higher redemption rate for Hispanic participants (60.7 percent) compared to non-Hispanic participants (39.9 percent). This is a higher overall rate and more pronounced difference than in Arizona, a Hispanic-majority state that offers non-whole grain cereal options. Arizona only recorded an 8.8 percent gap between Hispanic (57.0 percent) and non-Hispanic participants (48.2 percent). This data contributes to the growing evidence that families – including Hispanic families – welcome whole grain options for their children. Within a few years of implementing this standard, the Oklahoma Department of Health recorded higher rates of whole grain intake among toddlers.[141]

Although NWA is strongly supportive of requiring all WIC-approved cereals to meet a whole grain standard, NWA urges USDA to employ the stronger of the two possible standards – whole grain as the primary ingredient or the whole grain-rich calculation employed in school meals programs. The latter standard, which would provide ongoing continuity as children enter school and help bring products formulated for school meals into the retail market, assures that at least 50 percent of the grains included in a product are whole grain. USDA should exercise caution in creating a pathway for potential formulations where a

* For NWA's analysis on ready-to-eat breakfast cereals, see the Appendix.
† For more information on NWA's analysis of State WIC Agency EBT data, see the Appendix.

whole grain is listed as the primary ingredient, yet the overall balance of grains does not include a majority of whole grains. Although NWA appreciates the administrability of the primary ingredient standard from a participant education perspective, USDA should adopt the stronger standard to ensure healthier products on the market for both WIC families and the general shopping public.

NWA is supportive of including an added sugar standard for breakfast cereal, *only if* the existing total sugar standard is also maintained. In 2021, manufacturers implemented new Food and Drug Administration (FDA) requirements to include added sugars in the nutrition facts label.[142] Setting an added sugar standard, in addition to the total sugar standard, may enhance participant education about the nutrition facts label and healthier eating patterns that reduce added sugar intake. The added sugar standard should be comparable to the existing total sugar standard, which has served WIC participants well in providing healthier options. NWA is not supportive of adopting an added sugar standard in lieu of the current total sugar standard, with State WIC agencies expressing concern about the unlimited addition of dried fruits to breakfast cereals.

NWA raises a similar concern with the new criteria for whole grain breads, recognizing that USDA's proposal seeks consistency with other federal programs and would require whole grain breads to meet the whole-grain rich criteria employed in the Child and Adult Care Food Program. NWA is disappointed that USDA did not honor the NASEM recommendation to require 100 percent whole wheat breads. Therefore, NWA urges USDA to adopt the stronger of the two possible standards to ensure that WIC participants have access to the healthiest options.

- **Dairy and dairy alternatives.** Increased flexibility within the dairy category relies on additional elements of USDA's proposed rule that ensure delivery of priority nutrients like protein, calcium, and vitamin D. As the food package makes it easier for participants to redeem yogurt, tofu, and plant-based alternatives, USDA standards can encourage manufacturers to fortify these products with priority nutrients. NWA reiterates its support for an ongoing process that will allow wholly new products – like plant-based beverages – to be authorized when they meet certain nutrition standards.

  As fluid milk has long been fortified with vitamin D, NWA agrees with USDA's proposal to require a vitamin D specification for yogurts and soy-based yogurt alternatives. Vitamin D only naturally occurs in certain foods that are also provided in the food packages, such as certain seafood and eggs.[143] Current issuance of seafood and the imbalanced dairy issuance ensures that fully breastfeeding participants receive a significantly higher amount of vitamin D through the food package than other adults.[144] Even with the addition of seafood across the food packages, USDA's efforts to promote choice within the dairy category should not come at the expense of vitamin D intake. Following this same reasoning, NWA is supportive of USDA's proposals to set calcium specifications for tofu and both calcium and protein specifications for soy-based yogurt and cheese alternatives.

  NWA reiterates its support for maintaining current limitations on fluid milk fat content, in order to reduce saturated fat intake. The 2020-2025 DGAs set stricter limitations on Calories for Other Uses (COUs) to encourage healthier eating patterns.[145] Consistent with the DGA's intent and NASEM's recommendations, **NWA urges several steps to limit added sugar intake across the dairy category.** NWA agrees with USDA's proposed step to provide only unflavored fluid milk. The 2020-2025 DGAs maintain that "infants and young

children have virtually no room in their diet for added sugars," and caution against sweetened foods and beverages that could impact development of healthy taste preferences.[146] The DGAs' reasoning justifies a stricter limit on flavored milks than the school meals programs, when children consume more calories and taste preferences are more developed. The DGAs note that flavored milk only accounts for 2 percent of dairy intake among toddlers,[147] and only a small number of State WIC Agencies currently authorize flavored fluid milks.

Similarly, NWA is supportive of establishing total and added sugar standards for yogurts and plant-based yogurt alternatives. NASEM recommended a total sugar standard of 30 grams per 8 ounce serving, which reflects rules in the Child and Adult Care Food Program (CACFP).[148] Although not every WIC-approved yogurt is currently aligned with this proposed standard, there is broad availability of compliant products – including flavored varieties in an array of package sizes across major manufacturers.* The total sugar standard will provide consistency with other federal programs and work to reduce added sugars in products that are already not compliant.

In 2021, manufacturers implemented new Food and Drug Administration (FDA) requirements to include added sugars in the nutrition facts label.[149] Setting an added sugar standard, in addition to the total sugar standard, may enhance participant education about the nutrition facts label and healthier eating patterns that reduce added sugar intake. As NASEM established, natural sugars in yogurts may vary significantly based on fat content, package size, and other factors.[150] Although WIC should endeavor to deliver up-to-date nutrition education messages, the benefits of an added sugar standard for yogurt as a participant education tool may be outweighed by the complexity of differing standards across a single product, warranting further study by scientific experts to assess efficient nutrition education messaging.

Although NASEM did not propose an added sugar standard, NWA analysis of current yogurt formulations suggests lower rates of natural sugars than featured in the NASEM study. NASEM's varying added sugar suggestions, based on fat content, would exclude a broad range of flavored yogurt options that meet the total sugar standard.* NWA is supportive of maintaining flavored options for yogurt and soy-based beverages to build acceptance among WIC shoppers for a broader range of dairy and dairy alternatives, but efforts must be taken to reduce added sugars to remain consistent with efforts to limit added sugar consumption within the dairy food category and the broader food packages. **NWA recommends that USDA adopt an added sugar standard in alignment with the upper-most limit of the NASEM recommendations (18 grams per 8 ounce serving for yogurt and 10 grams per 8 ounce serving of soy-based alternatives).** As yogurt manufacturers will already be reformulating products to align with the proposed rule's vitamin D specification, modest reductions to added sugars would be appropriate to provide both WIC consumers and the general shopping public with healthier options. Some of these reductions in added sugars will already be accomplished through efforts to comply with the total sugar standard. Future scientific reviews should assess whether different added sugar limits would be appropriate for low/non-fat yogurts, smaller package sizes, and soy-based alternatives.

* For NWA's analysis of sugars in yogurt and yogurt redemptions, see the Appendix.

**Improving Choice Among WIC-Approved Products**

Through benefit issuance and nutrition standards, WIC is positioned to build healthier eating patterns that promote consistency with the DGAs. Within the bounds of nutrition guidelines, WIC must continue to make efforts to empower participants with flexibility that addresses ongoing barriers in the shopping experience and cultural preference. Proposed changes – such as increases to the versatile Cash Value Benefit, the addition of seafood and cultural whole grain options, new dairy substitution patterns, and pathways for nutritionally equivalent dairy alternatives – make significant progress in building a more inclusive food package that reflects the diversity of dietary preferences within the WIC-eligible population.

- **Maximum monthly allowances and package sizes.** WIC food package regulations can create challenges for participants, manufacturers, and retailers by prescribing specific package and/or container sizes to deliver specific amounts of priority nutrients. Participant confusion, in particular, about package size restrictions could complicate the shopping experience and inhibit full redemption.[151] The 2017 NASEM Report was mindful of ongoing challenges with administrability in the shopping experience, offering concrete recommendations on package size flexibility for whole-grain breads and yogurts.[152]

  The USDA proposed rule goes beyond the NASEM recommendations and allows State WIC agencies to authorize additional package sizes that do not necessarily align with the maximum monthly allowance (MMA) across all food categories, with the exception of infant formula. **NWA is strongly supportive of this proposal to provide package size flexibility throughout the WIC food packages.** "WIC-only" package sizes (*e.g.*, 32-ounce tubs of yogurt, 1-pound loaves of bread, etc.) can lead to stocking challenges in store, higher program costs, stigma in the shopping experience, and food waste at home.[153] Providing a broader range of options for participants will enhance choice and provide greater flexibility for families to shop for brands and sizes that align with their consumption patterns.

  NWA is supportive of permitting State WIC agencies to authorize package sizes that do *not* add up to the MMA. For example, single-serve or multipack yogurts may be offered in a range of sizes, including 4 ounces, 5.3 ounces, and 6 ounces – of which, only one adds up to the 32-ounce MMA. NWA is supportive of a broader range of choice among nutritionally appropriate foods and is confident that nutrition education, paired with helpful shopping tools like State food lists and shopping apps, can support participants in navigating a more robust shopping experience.[154] Consistent with this reasoning, NWA supports permitting State WIC agencies to authorize package sizes above the MMA to be redeemed with aggregate benefits across multiple family member participants.

  **NWA urges USDA to go beyond its proposal and provide container size flexibility within the infant formula category.** Between February 2022 and April 2023, WIC participants have been offered a broader range of infant formula products to address unprecedented shortages related to the closure of an Abbott Nutrition manufacturing plant. With these flexibilities expiring, USDA should seek to provide longer-term choice for families with formula-fed infants – which can reduce the aforementioned challenges of a "WIC-only" size and mitigate the lingering effects of sector-wide shortages. Unlike the broader food package, NWA would encourage limiting container size flexibility in the infant formula category to those that add up *exactly* to the MMA to ensure that the specific nutrient needs of formula-fed infants are being met.

- **Supporting breastfeeding outcomes.** For several decades, WIC program structure has increasingly prioritized breastfeeding support to address systemic and structural disparities in breastfeeding outcomes among the WIC-eligible population. Although external factors can have a pronounced impact on breastfeeding success, including unsupportive work environments and lack of culturally competent lactation staff within hospitals and other clinical settings, WIC's professional and peer support has improved initiation, duration, and exclusivity rates – with approximately 4 out of 10 WIC-enrolled infants being breastfed in fall 2022.[155]

  In 1992, WIC established a fully breastfeeding package (Food Package VII) to encourage exclusive breastfeeding and strengthen the program's commitment to breastfeeding support. The initial fully breastfeeding food package was intentionally set at a higher value and introduced the first vegetable (carrots) and seafood to provide added diversity for exclusively breastfeeding participants.[156] Even with the introduction of this new food package and changes to support breastfeeding in the 2009 food package review, more than 65 percent of WIC-enrolled infants were certified for the fully formula fed package for all years prior to 2022.[157]

  The 2017 NASEM Report found that WIC's current issuance structure, including a one-month package that limits partially breastfed infants to one can of formula, did not result in substantial shifts in breastfeeding.[158] NASEM alluded to the fact that low breastfeeding confidence could instead direct new parents toward the fully formula fed package, undermining WIC's intention of supporting breastfeeding at any intensity.[159] NWA supports USDA's proposal to shift toward "up to" infant formula amounts, which will empower WIC's lactation support workforce to work with families to individualize issuance and support parents' breastfeeding goals.

  NWA likewise supports USDA's proposal, consistent with the NASEM recommendations, to strengthen the partially breastfeeding package to encourage breastfeeding of any intensity. Per NWA estimates drawing on USDA data,[160] the difference between the current partially and fully breastfeeding packages is roughly twice the difference between the partially breastfeeding and postpartum (non-breastfeeding) package.* USDA's proposed rule would reverse that structure, bolstering the gap between the postpartum and partially breastfeeding package to promote breastfeeding of any intensity. When coupled with increased flexibility in the first month issuance for partially breastfed infants, this structural change could result in enhanced breastfeeding initiation.

  Although NWA is supportive of enhancing structural incentives within the partially breastfeeding package, NWA estimates that USDA's proposed changes will not only erase the incentive of the fully breastfeeding package, but actually result in a slightly higher value for the partially breastfeeding package.* NWA cautions USDA against this approach and urges slight increases to the fully breastfeeding package to restore a narrow structural incentive. NWA estimates that maintaining seafood issuance at 30 ounces per month in the fully breastfeeding package will accomplish this goal while promoting consistency with NASEM's approach of balanced issuance across food groups.

- **Infant formula and infant foods.** The DGAs have consistently emphasized the importance of assuring adequate iron intake during infancy.[161] Especially given WIC's disproportionate

* For analysis on the projected costs of the adult food packages, see the Appendix.

share of the market, WIC nutrition standards encouraging iron fortification have led to substantial shifts in the availability of iron-fortified infant formulas and infant cereals.[162] With at least 13 percent of one-year-old children enrolled in WIC testing for iron-deficiency anemia and clear racial disparities that impact Black children in particular,[163] NWA urges ongoing attention to adequate iron intake during infancy.

Infant formula flexibilities enacted after the Abbott Nutrition recall in spring 2022 resulted in the introduction of several foreign formula brands to U.S. markets. Some of these infant formulas fall below current WIC standards for iron fortification. Although NWA is supportive of efforts to enhance participant choice among infant formula brands within program constraints,[164] NWA is not supportive of departing from current iron fortification requirements to accomplish this goal. WIC iron fortification requirements are not a substantial barrier-to-entry for new infant formula brands, which must contend with more stringent requirements (*e.g.*, the contractual requirement to provide all three forms of ready-to-feed, liquid concentrate, and powder) as well as tariffs and other regulatory requirements of the Food and Drug Administration.

NWA is mindful of the ongoing challenges with incentivizing redemption of jarred infant meats, which deliver iron and zinc to older infants. NWA continues to observe that jarred infant meats are the lowest redeemed food issued through the WIC food packages. As discussed above, NWA encourages USDA to proactively work to assure broader availability of seafood pouches suitable for six-month-old infants and older, which can be designated as a substitute for jarred infant meats.

In another step to promote broader choice across the food package, NWA is strongly supportive of USDA's proposed substitution pattern for jarred infant fruits and vegetables. This step will enhance participant choice and bolster the most versatile element of the food package. With tailored nutrition education, enhanced access to fruits and vegetables can also empower participants to make developmentally appropriate homemade infant foods. As with other elements of the Cash Value Benefit, NWA urges USDA to employ an inflation adjustment calculation that rounds both up and down to provide a more accurate estimate and prevent erosion of WIC participants' purchasing power.

- **Fruits and vegetables.** To further enhance the versatility of the Cash Value Benefit, NWA is strongly supportive of the inclusion of fresh herbs. The DGAs recognize that herbs (*e.g.*, cilantro, basil, etc.) can help incorporate cultural traditions and add flavor to foods when reducing added sugars, saturated fats, and sodium.[165] Adding fresh herbs will also promote alignment with foods made available through the WIC Farmers Market Nutrition Program (WIC FMNP), which is increasingly synchronizing transaction technologies with WIC. Streamlining and simplifying the joint WIC/WIC FMNP transaction can encourage enhanced redemptions at farmers markets and farm stands, returning more resources to local producers and building WIC participants' awareness of their own local food economies.

  NWA is also strongly in support of requiring State WIC agencies to authorize an additional form, other than fresh, of fruits and vegetables. The vast majority of State WIC agencies currently authorize an additional form, which is most frequently frozen fruits and vegetables. NWA would be supportive of requiring both frozen and canned fruits and vegetables to provide greater choice to participants, recognizing that State WIC agencies will need an implementation period to fully authorized canned products. NWA is not supportive of a requirement that State WIC agencies authorize dried fruits and vegetables,

as State WIC agencies would benefit from ongoing discretion.

NWA likewise raises concern with USDA's proposal to include larger sizes of assorted fruits and vegetables. Multiple State WIC agencies raised administrability concerns, as store-prepared packages may have fluid Universal Product Codes (UPCs) that would not be readily incorporated into WIC systems. Although NWA is supportive of providing a broader range of choice and variety for WIC participants, industry efforts to standardize programming of these packaged options would be needed to feasibly implement this option for WIC shoppers.

- **Protein foods.** Although protein foods are the least issued of the five core DGA food groups delivered in the WIC food packages, NWA recognizes that protein foods are not necessarily nutritionally interchangeable. NWA reiterates the protein food category as an area for enhanced investment. NWA particularly encourages USDA to consider modifying egg issuance to account for the availability of 18-count package sizes, which could be a targeted step in providing greater flexibility and boosted protein issuance. With this step, USDA should also consider modifying issuance to 3 dozen eggs in Food Package VII, which can further address the need for structural incentives to support exclusive breastfeeding.

  NWA is supportive of efforts to add nutritionally comparable peanut butter alternatives that can provide increased choice for WIC participants and address participant allergies, which can disproportionately impact certain racial and ethnic groups.[166] Almond butter, for example, may deliver similar amounts of protein, potassium, and iron, while also reducing saturated fats and sodium compared to peanut butter. Although nut butters may be the most straightforward alternatives, USDA should also explore inclusion of nutritionally comparable nuts and seeds.

  NWA is supportive of proposals to increase substitution patterns throughout the package that maximize choice while maintaining the nutritional integrity of alternative food packages. USDA's reliance on NASEM's recommendations consistently ensure that the WIC food packages are inclusive of vegetarian and vegan diets, religious-based food practices (*e.g.*, kosher, halal, etc.), and food allergies and sensitivities. USDA's proposals to enhance access to egg substitutes through new patterns that provide enhanced issuance of legumes, peanut butter, and (at state discretion) tofu will enhance choice across the protein food group. NWA would likewise be supportive of designating eggs as an allowable substitution for peanut butter.

  While considering enhanced flexibility across the food packages, NWA urges USDA to be mindful of State WIC agency challenges with programming substitutions into State Management Information Systems, especially if one food can be considered a substitution across multiple food categories (*e.g.*, tofu as a substitute for both fluid milk and eggs).

**Implementation**

NWA is encouraged by the breadth of USDA's proposals, which can enhance the program's role in building healthier eating patterns and closing income- and race-based nutrition disparities across WIC's eligible population. The WIC stakeholder community will need to move swiftly to implement these changes after a final rule is issued, including programming updates to State Management Information Systems, participant education about new shopping patterns, and manufacturer reformulations to account for stronger nutrition standards. USDA should make new funding

available to State WIC agencies to support prompt modifications to WIC systems. **In addition to additional funding, NWA recommends an extension of the proposed timeframe from 18 to 24 months to provide adequate time for the stakeholder community to prepare the new food packages for issuance.** Although State WIC agencies will endeavor to implement these changes as soon as practicable, USDA should offer a good-faith extension pathway for State WIC agencies that require additional time to complete programming of the new food packages.

USDA proposes that State WIC agencies issue food benefits based on either the revised food packages or current food packages, but could not combine the two within any food package.[167] While NWA appreciates the logic of this provision, **NWA urges that USDA clarify ongoing authority for State agencies to issue revised amounts for the Cash Value Benefit.** As currently proposed, NWA expresses concern that State WIC agencies would be required to issue the current regulatory amounts (*e.g.*, $9/month for children) unless the entire food package is consistent with the revised amounts included in a final rule. Implementation of the complete food packages will take time, and NWA urges USDA to avoid a scenario where participant benefits are drastically cut in the midst of implementation. Even if USDA's phrasing would be inclusive of Congressional authority to maintain issuance at NASEM-recommended levels (as Congress has extended authority for the NASEM-recommended CVB amounts in bipartisan appropriations legislation throughout fiscal years 2022 and 2023), appropriations legislation has typically been passed with little notice and results in last-minute issuance. In order to reduce participant confusion and relieve administrative burden on State systems and local agency staff, NWA urges clarity within the final rule about ongoing authority to issue revised CVB amounts.

## Conclusion

NWA applauds USDA on its thoughtful, science-based proposals to update the WIC food packages and promote further consistency between WIC benefit issuance and the 2020-2025 DGAs. Consistent with independent recommendations from the National Academies, USDA's proposals will provide greater balance across core DGA food groups, promote greater flexibility within food categories to address cultural preferences and food allergies/sensitivities, and strengthen nutrition standards to ensure greater delivery of priority nutrients and shift consumption patterns to reflect longstanding DGA recommendations. With WIC starting to reach a larger share of the eligible population, USDA's proposed updates will work to strengthen nutrition security, dismantle food access disparities, and build an equitable start for the next generation.

We appreciate your consideration of our comments. If you have any questions about the above statements, please reach out to me or NWA's Senior Director of Public Policy Brian Dittmeier at bdittmeier@nwica.org.

Sincerely,

Dr. Jamila Taylor
President & CEO
National WIC Association

## Endnotes

[1] Soneji S & Beltran-Sanchez H (2019) Association of Special Supplemental Nutrition Program for Women, Infants, and Children With Preterm Birth and Infant Mortality. JAMA Network Open 2(12). https://doi.org/10.1001/jamanetworkopen.2019.16722.
[2] Centers for Disease Control and Prevention. Obesity Among WIC-Enrolled Young Children. https://www.cdc.gov/obesity/data/obesity-among-WIC-enrolled-young-children.html (last updated Nov. 8, 2022).
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## Appendix: National WIC Association Data Analysis

*Redemption Data*

The National WIC Association compiled EBT redemption data from 13 geographic State WIC agencies: Arkansas, Arizona, Colorado, Maryland, Massachusetts, Michigan, Minnesota, Montana, Nevada, New Mexico, Oklahoma, Oregon, and Texas. The sample includes EBT data from January 2019 through mid-2022 and constitutes approximately 28 percent of the total WIC caseload.

| Food Category | NASEM Analysis (2013-2016 redemption data) | NWA Pre-COVID Analysis (2019 redemption data) | NWA Present Day Analysis (2022 redemption data) | NWA Multi-year Analysis (2019-2022 redemption data) |
|---|---|---|---|---|
| Cash Value Benefit | 77% | 77% | 68% | 71% |
| Juice | 70% | 58% | 46% | 51% |
| Low-Fat Milk | 65% | 64% | 48% | 55% |
| Whole Milk | 75% | 76% | 65% | 68% |
| Cheese | 70% | 70% | 57% | 62% |
| Yogurt | -- | 53% | 45% | 48% |
| Whole Grains | 53% | 58% | 45% | 48% |
| Breakfast Cereal | 60% | 59% | 44% | 50% |
| Eggs | 80% | 76% | 66% | 68% |
| Seafood | 69% | 56% | 44% | 48% |
| Peanut Butter/Legumes | 51% | 56% | 46% | 49% |
| Infant Formula | 94% | 90% | 77% | 85% |
| Infant Cereal | 47% | 49% | 38% | 43% |
| Infant Fruits/Vegetables | 51% | 61% | 49% | 55% |
| Infant Meats | 31% | 30% | 21% | 25% |

*WIC Issuance, as a Proportion of DGA-Recommended Intake*

**Children:**

| Food Category | DGA Recommended Intake | Current Issuance - Total | NASEM Recommended Issuance - Total | USDA Proposed Rule Issuance - Total |
|---|---|---|---|---|
| Total Fruit | 1.25 | 72% | 60% | 76% |
| Fruit (CVB) | 0.63 | 58% | 65% | 109% |
| Juice | 0.63 | 85% | 53% | 43% |
| Total Vegetables | 1.50 | 20% | 22% | 54% |
| Vegetables (CVB) | 1.50 | 12% | 16% | 46% |
| Legumes | 0.07 | 177% | 120% | 177% |
| Total Dairy | 2.50 | 85% | 75% | 75% |
| Total Grains | 4.50 | 50% | 44% | 44% |
| Whole Grains | 2.25 | 58% | 61% | 62% |
| Refined Grains | 2.25 | 43% | 27% | 27% |
| Total Protein Food | 3.50 | 28% | 33% | 33% |
| Eggs | 0.36 | 17% | 17% | 17% |
| Seafood | 2.36 | 0% | 19% | 23% |
| Peanut Butter | 0.71 | 167% | 111% | 167% |

**Pregnant Women:**

| Food Category | DGA Recommended Intake | Current Issuance - Total | NASEM Recommended Issuance - Total | USDA Proposed Rule Issuance - Total |
|---|---|---|---|---|
| Total Fruit | 2.00 | 52% | 44% | 75% |
| Fruit (CVB) | 1.00 | 45% | 61% | 123% |
| Juice | 1.00 | 60% | 27% | 27% |
| Total Vegetables | 3.00 | 16% | 13% | 49% |
| Vegetables (CVB) | 3.00 | 7% | 9% | 41% |
| Legumes | 0.29 | 88% | 71% | 88% |
| Total Dairy | 3.00 | 98% | 71% | 75% |
| Total Grains | 7.00 | 25% | 22% | 40% |
| Whole Grains | 3.50 | 22% | 31% | 63% |
| Refined Grains | 3.50 | 28% | 13% | 17% |
| Total Protein Food | 1.60 | 27% | 14% | 32% |
| Eggs | 4.43 | 9% | 9% | 9% |
| Seafood | 1.29 | 0% | 8% | 26% |
| Peanut Butter | 1.20 | 168% | 56% | 168% |

| Seafood Redemptions by Fish Type, FY2022 Data | | | |
|---|---|---|---|
| **State Type/Size** | **Tuna Proportion** | **Salmon Proportion, if data provided** | **Sardines Proportion, if data provided** |
| **Average across Sample** | 78.94% | 13.25% | 11.00% |
| Large Geographic | 90% | -- | -- |
| Large Geographic | 87% | 10% | 3% |
| Large Geographic | 79% | 12% | 9% |
| Mid-Size Geographic | 81% | 14% | 5% |
| Mid-Size Geographic | 81% | -- | -- |
| Mid-Size Geographic | 80% | -- | -- |
| Small Geographic | 88% | 12% | -- |
| Small Geographic | 86% | 14% | -- |
| Small Geographic | 85% | -- | -- |
| Small Geographic | 78% | -- | -- |
| Small Geographic | 77% | 16% | 7% |
| Small Geographic | 60% | -- | -- |
| Small Geographic | 51% | 16% | 31% |
| ITO | 88% | 12% | -- |
| ITO | 84% | -- | -- |
| ITO | 68% | -- | -- |

| Proposed Impacts of Dairy Issuance[167] | | | |
|---|---|---|---|
| **Dairy Type** | **Redemption Rates (NASEM)** | **Quarts *Redeemed* per year (current)** | **Quarts *Issued* per year (revised)** |
| **Whole Fat Dairy (1yo)** | 75% | 153,520,732 | 153,520,732 |
| **Child Low-Fat Dairy** | 71% | 361,071,303 | 444,982,240 |
| **Adult Low-Fat Dairy** | 56% | 190,149,228 | 264,733,056 |
| **Total Dairy** | -- | 704,741,262 | 863,236,027 |

| Structural Breastfeeding Incentives in the Adult Food Packages | | | |
|---|---|---|---|
| **Food Package** | **Estimated FY24 Caseload[167]** | **Estimated Monthly Value** | **Structural BF Incentive** |
| **FP VI (postpartum), current** | 399,750 | $30.79 | -- |
| **FP V-B (Partial BF), current** | 304,163 | $35.84 | $5.05 |
| **FP VII (Fully BF), current** | 180,260 | $45.21 | $14.42 |
| **FP VI (postpartum), revised** | 399,750 | $55.01 | -- |
| **FP V-B (Partial BF), revised** | 304,163 | $63.18 | $8.17 |
| **FP VII (Fully BF), revised** | 180,260 | $63.06 | $8.05 |
| **FP VII (Fully BF), revised (if NWA recommendations included: fish maintained at 30 oz/month and 3 dozen eggs issued)** | 180,260 | $64.26 | $9.25 |

| WIC-Approved Cereals Current Compliance with USDA Proposed Whole Grain Criteria | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Brand** | **Whole Grain** | **Cereal Type** | **Gluten Free** | **Brand** | **Whole Grain** | **Cereal Type** | **Gluten Free** |
| Blue Berry Kix | X | Corn | | FMW – Pumpkin | X | Whe | |
| Blueberry Chex | X | Rice | GF | FMW – Strawberry | X | Whe | |
| Cheerios | X | Oat | GF | FMW – Little Bites | X | Whe | |
| Cheerios - Oat Cr. Berry | X | MG | | FMWLB - Chocolate | X | Whe | |
| Cinnamon Chex | X | Rice | GF | Rice Krispies | | Rice | |
| Corn Chex | X | Corn | GF | Special K | | Rice | |
| Fiber One Honey Clust. | X | Whe | | SK – Banana | X | MG | |
| Honey Kix | X | Corn | | SK – Cinnamon | X | MG | |
| Kix | X | Corn | | SK – Honey Almond | X | MG | |
| Multigrain Cheerios | X | MG | GF | Unfrosted MW | X | Whe | |
| MGC – Strawberry | X | MG | GF | Grape Nuts | X | Whe | |
| Rice Chex | X | Rice | GF | Grape Nuts Flakes | X | Whe | |
| Sesame St. – Cinnamon | X | Corn | GF | GG – Banana Nut | X | MG | |
| Sesame St. – Berry | X | Corn | GF | GG – Crunch Pecan | X | MG | |
| Total | X | Whe | | HBO Almond | | MG | |
| Vanilla Chex | X | Rice | | HBO Cinnamon | | MG | |
| Wheat Chex | X | Whe | | HBO Honey Roast. | | MG | |
| Wheaties | X | Whe | | HBO Honey Crunch | X | MG | |
| All Bran Complete | X | Whe | | HBO Pecan/Maple | | MG | |
| Cinnamon Corn Flakes | | Corn | | HBO Vanilla Bunch | X | MG | |
| Corn Flakes | | Corn | | Life Original | X | MG | |
| Crispix | | MG | | Life Strawberry | X | MG | |
| Frosted Mini Wheats | X | Whe | | Life Vanilla | X | MG | |
| FMW – Berry | X | Whe | | OS Brown Sugar | X | MG | |
| FMW – Blueberry | X | Whe | | OS Cinnamon | X | MG | |
| FMW – Cinnamon | X | Whe | | OS Golden Maple | X | MG | |
| FMW – Fruit | X | Whe | | OS Honey Nut | X | MG | |

| Sugar Content in Selected Flavored Yogurts | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| **Yogurts** | **Fat Content** | **Serving Size** | **Total Sugars per serving** | **Natural Sugars per serving** | **Added Sugars per serving** | **Total Sugars per unit** | **Natural Sugars per unit** | **Added Sugars per unit** |
| Chobani Vanilla 5.3 oz | Low | 5.3oz | 14g | 5g | 9g | 2.64/oz | 0.94/oz | 1.70/oz |
| Chobani Vanilla 32 oz | Low | 170g | 15g | 5g | 10g | 0.088/g | 0.029/g | 0.059/g |
| Chobani Strawberry 32 oz | Non | 170g | 17g | 6g | 11g | 0.100/g | 0.035/g | 0.065/g |
| Chobani Strawberry 7 oz (drinkable) | Low | 7 oz | 16g | 8g | 8g | 2.29/oz | 1.14/oz | 1.14/oz |
| Dannon Vanilla 5.3 oz | Low | 150g | 21g | 8g | 13g | 0.140/g | 0.053/g | 0.087/g |
| Dannon Vanilla 32 oz | Low | 170g | 24g | 10g | 14g | 0.141/g | 0.059/g | 0.082/g |
| Dannon Strawberry 32 oz | Non | 170g | 20g | 7g | 13g | 0.118/g | 0.041/g | 0.077/g |
| Dannon Strawberry 4 oz | Non | 113g | 9g | 5g | 4g | 0.080/g | 0.044/g | 0.035/g |
| Yoplait Vanilla 6 oz | Low | 170g | 20g | 6g | 14g | 0.118/g | 0.035/g | 0.082/g |
| Yoplait Vanilla 32 oz | Low | 170g | 21g | 5g | 16g | 0.124/g | 0.029/g | 0.094/g |
| Yoplait Strawberry 32 oz | Low | 170g | 21g | 5g | 16g | 0.124/g | 0.029/g | 0.094/g |
| Yoplait Strawberry 6 oz | Non | 170g | 7g | 6g | 1g | 0.041/g | 0.035/g | 0.006/g |

CACFP guidance recommends that total sugars of 30 grams per an 8 ounce serving accords with 3.83 per ounce and/or 0.135 per gram. Per these calculations, NWA estimates that:

18 grams per 8 ounce serving accords with 2.30 per ounce and/or 0.081 per gram.
13 grams per 8 ounce serving accords with 1.66 per ounce and/or 0.059 per gram.
11 grams per 8 ounce serving accords with 1.40 per ounce and/or 0.050 per gram.

Red shading indicates that a yogurt would not be compliant with new standards. Yellow shading indicates a yogurt may be compliant with new standards if the upper-most limit is implemented (18 grams per 8 ounce serving for added sugars).