



National WIC Association

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of Pediatrics



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October 28, 2021

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

Dear Secretary Vilsack:

The undersigned organizations are unequivocally committed to the success of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) as an effective driver of improved pregnancy, birth, and childhood outcomes. We appreciate your leadership in focusing on nutrition insecurity and identifying steps to address chronic diet-related conditions like diabetes and obesity, including measures to improve WIC services.

We urge swift publication of a proposed rule by December 31, 2021 that would update WIC-approved foods to enhance dietary quality for the approximately 6.3 million women, infants, and children participating in WIC. We request a meeting with you to discuss the urgency of this action.

As you well know, for nearly fifty years, WIC has worked to support positive pregnancy, birth, and early childhood outcomes, giving children a healthy start through a combination of monthly benefits to purchase healthy foods and quality nutrition and breastfeeding services delivered in community-based clinics. WIC's public health impact was significantly expanded in 2009, with the implementation of the science-based revisions to the WIC food packages that introduced fruits, vegetables, and whole grains as WIC-approved products. These changes drove increased consumption of all three food groups among WIC participants.¹ Notably, the healthier options made available to child participants is associated with a nationwide reduction in the prevalence of childhood obesity among WIC-enrolled toddlers,² completely erasing an income-based disparity by aligning WIC-enrolled toddlers with the general child population by 2016.³

WIC's nutrition support has proven even more critical during the COVID-19 pandemic, when families with children have faced increased economic hardship and food insecurity. These disruptions to children's growth have resulted in increased childhood obesity rates over the last year, impacting children age 2-5 and reversing hard-earned progress made before the pandemic.⁴ USDA has taken several steps under your leadership, including through funding provided by the American Rescue Plan Act, to increase program participation and connect eligible individuals with WIC's nutrition services. Although WIC participation has increased since the beginning of the pandemic – including an 8% increase in child participation – more action must be taken to remove ongoing barriers to program retention and support the long-term nutrition and developmental needs of our nation's children.

In January 2017, the National Academies of Sciences, Engineering, and Medicine (NASEM) issued a comprehensive report by an independent expert panel that evaluated the WIC food packages. The report, titled *Review of WIC Food Packages: Improving Balance and Choice*, included a thorough list of recommended changes to issuance, substitution options, and nutrient quality to promote alignment with the Dietary Guidelines for Americans (DGAs).⁵ The National WIC Association issued a separate report in June 2021, noting that the 2017 NASEM Report remained foundational to future reforms, especially since the federal DGA recommendations were “relatively consistent” between 2015-2020 and 2020-2025.⁶ Indeed, given the four years of study by the Food and Nutrition Service (FNS), the NASEM recommendations should effectively aide FNS in swiftly drafting a proposed rule.

Absent swift USDA action, WIC participants must rely on a series of crucial, yet patchwork measures, including: expanded package size options for whole grains, yogurt, canned fish, cereals, cheese, eggs, juice, and tofu under the Families First Coronavirus Response Act, new substitution options for dairy and protein foods provided under COVID-related waivers, and enhanced Cash Value Benefits (CVBs) for fruit and vegetable purchases reaching over 4.7 million participants implemented under the American Rescue Plan Act and the September 30 continuing resolution. All these emergency measures are temporary. While they respond to real systemic challenges in the WIC food packages, they must be addressed by building on the 2017 NASEM Report’s recommendations in a formal rulemaking.

USDA must quickly enact transformative change that would enhance access to healthy foods, meaningfully tackle chronic diet-related conditions at the earliest lifespans, and resolve barriers to the WIC shopping experience. Publishing a proposed rule revising the WIC food package before December 31, 2021, is essential to bolstering WIC’s public health impact. We look forward to meeting with you to discuss swift action to assure WIC families realize their full potential with the support of this successful, effective program. The clock is ticking.

Sincerely,

National WIC Association
Academy of Nutrition and Dietetics
American Academy of Pediatrics
Bread for the World
National Grocers Association
United Fresh Produce Association

¹ Whaley S, Ritchie LD, Spector P, Gomez J (2012) Revised WIC food package improves diets of WIC families. *Journal of Nutrition Education and Behavior* 44(3):204-209.

² Pan L, Blanck H, Park S, Galuska DA, Freedman DS, Potter A, Peterson R (2019) State-Specific Prevalence of Obesity among Children Aged 2-4 Enrolled in the Special Supplemental Nutrition Program for Women, Infants, and Children – United States, 2010-2016. *CDC Morbidity and Mortality Weekly Report* 68(46):1057-1061. https://www.cdc.gov/mmwr/volumes/68/wr/mm6846a3.htm?s_cid=mm6846a3_w.

³ See Hales CM, Carroll MD, Fryar CD, Ogden CL (2017) Prevalence of Obesity Among Adults and Youth: United States, 2015-2016. *NCHS Data Brief No. 288*. <https://www.cdc.gov/nchs/data/databriefs/db288.pdf>.

⁴ Jenssen BP, Kelly MK, Powell M, Bouchelle Z, Mayne SL, Fiks AG (2021) COVID-19 and Changes in Child Obesity. *Pediatrics* 147(5):e2021050123. <https://doi.org/10.1542/peds.2021-050123>.

⁵ National Academies of Sciences, Engineering, and Medicine (2017) *Review of WIC Food Packages: Improving Balance and Choice: Final Report*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/23655>.

⁶ National WIC Association (2021) *Enhancing the WIC Food Package: Impacts and Recommendations to Advance Nutrition Security*. <https://s3.amazonaws.com/aws.upl/nwica.org/nwa-wic-food-package-report.pdf>.