

November 6, 2006

Patricia N. Daniels  
Director, Supplemental Food Programs Division  
Food and Nutrition Service  
USDA  
3101 Park Center Drive  
Room 528  
Alexandria, VA 22302

RE: Docket #ID Number 0584-AD77, WIC Food Package Rule

Dear Ms. Daniels,

The United States Lactation Consultants Association (USLCA) strongly supports the USDA-FNS 7 CFR Part 246 Special Supplemental Nutrition Program for Women, Infants and Children (WIC): *Revisions in the WIC Food Package: Proposed Rule*, with minor recommendations.

The following highlights the USLCA's support and recommendations related to this rule.

1. The proposed rule is based on evidenced based research and science. It follows guidance from the American Academy of Pediatrics, World Health Organization, and 2005 Dietary Guideline for Americans.
2. Strong support for exclusive breastfeeding.
  - a. No formula given to either partially or exclusively breastfeeding infants in the first month with the inclusion of IOM's recommendation that small amounts of formula can be offered during the first month while exclusive breastfeeding is being established. The amount of formula provided should vary with the circumstance.
  - b. After the first month, exclusively breastfeeding infants would continue to receive no formula and partially breastfeeding infants would only be allowed approximately half of the current allowance.
  - c. No cereals given to infants until six months of age and no juices given until one year of age.
  - d. Removed the definition of breastfeeding "on the average of at least once a day".
  - e. Highest food package incentives for exclusively breastfeeding mothers and partially breastfeeding mothers receive higher food packages than formula feeding mothers
3. Recommend funding for IBCLCs to work with WIC in contractual or staffed roles at national, state and local levels. Provide continued support and funding for the staffed role of Breastfeeding Peer Counselors.

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4. Provide an increase to the fruit and vegetable vouchers for the exclusively breastfeeding woman's package for cost neutrality. Same quantity of fruits and vegetables should be purchased for rural or urban areas. Make each fruit and vegetable as an individual item in accordance with the cost containment regulation.
5. Recommendation of the use of jarred baby fruits and vegetables changed to the use of fresh (or canned) foods. The use of infant manufactured foods is a significant step backwards for the following reasons:
  - a. Increase chance of inappropriate use or fraud in purchasing inappropriate jarred infant foods
  - b. Increased counseling time will need to go towards appropriate purchasing of such foods and not "desserts" or "dinners" that are not 100% fruits or vegetables. This counseling time could be more effectively used towards extending breastfeeding durations.
  - c. Parents will not learn how to purchase and serve appropriate infant foods at the table and the transition for toddler feeding is lost.
  - d. This is an incorrect message, that these foods are better than fresh.
6. Additional recommendations are supported of routine food options:
  - a. Reduces the numbers of higher fat foods.
  - b. Cereals to be 100% whole grain to meet the Dietary Guidelines and to include brown rice and bulgur as options and should allow substitutions to accommodate medical conditions.
  - c. Fruits and vegetable to be fresh, canned, or frozen.
  - d. Inclusion of culturally diverse foods choices such as tortillas, tofu, soy products, canned beans.
  - e. Allow the use of tofu, soy-based drinks in substitution in cases of milk allergy and intolerance.
7. Recommendation that an alternative solution to the proposed rounding up methodology for infant formula is made that allows for consistency in the number of cans of formula be provided. Present proposal is confusing to both staff and to recipients.
8. EBT card use should allow for immediate transfer and utilization/purchase of food package benefits (i.e. exclusively breastfeeding packages).

Thank you for your continued support of WIC families.

Sincerely,

Glenda Dickerson RN, MS, IBCLC  
President  
United States Lactation Consultant Association

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