

February 14, 2023

Honorable Cindy Long  
Administrator  
United States Department of Agriculture, Food and Nutrition Service  
Braddock Metro Center II  
1320 Braddock Place  
Alexandria, VA 22314

Submitted electronically to: <https://www.federalregister.gov/documents/2022/11/21/2022-24705/special-supplemental-nutrition-program-for-women-infants-and-children-wic-revisions-in-the-wic-food>

RE: FNS-2022-0007: Special Supplemental Nutrition Program for Women, Infants, and Children: Revisions in the WIC Food Packages

Dear Administrator Cindy Long,

The Colorado Children's Campaign is pleased to provide the USDA Food and Nutrition Service comments in support of the proposed rule, FNS-2022-0007: Special Supplemental Nutrition Program for Women, Infants, and Children: Revisions in the WIC Food Packages.

The Colorado Children's Campaign is a nonprofit, nonpartisan policy, research and advocacy organization committed since 1985 to realizing every chance for every child. We advocate for the development and implementation of data-driven public policies that improve child well-being in health, early childhood, family economic prosperity, and youth success. We do this by providing Coloradans with trusted data and research on child well-being and organizing an extensive statewide network of dedicated child advocates.

We appreciate the opportunity to make the following comments on this FNS proposed rule. We enthusiastically support the proposed rule and the updates it proposes to the Supplemental Nutrition Program for Women, Infants, and Children (WIC) Food Packages, and ask that the proposed rule be finalized in a timely manner.

Food security is a pillar in our health initiatives at the Children's Campaign, especially as food insecurity has continued to be a pervasive issue across our state. On average, between 2017 and 2019, 16% of Colorado kids lived in households that were food-insecure at some point during the year.<sup>1</sup> According to the latest data from the Colorado Department of Public Health & Environment (CDPHE), 85,531 Coloradans are enrolled in WIC.<sup>2</sup> Therefore, the WIC Program is a critical benefit for thousands of eligible Coloradans to ensure that they can access the food they need.

---

<sup>1</sup> [2022-KC-Final-Low-Res.pdf \(coloradokids.org\)](#)

<sup>2</sup> [COWIC Snapshot Fall 2022 FINAL.pdf - Google Drive](#)

The WIC food packages are an important supplemental food resource for WIC enrollees, providing food and beverages tailored to their relative life stage to promote healthy development. Despite WIC providing this benefit for Coloradans and women and children nationwide, the current nutrition standards for these WIC food packages have not been updated since 2014.<sup>3</sup> Based on recommendations from the National Academies of Science, Engineering, and Medicine (NASEM)<sup>4</sup> and the FNS Dietary Guidelines for Americans 2020-2025<sup>5</sup>, as well as input from WIC enrollees and community and state organizations and advocates, WIC food packages should be revised to better meet the needs of enrollees in the program.

The Children’s Campaign strongly supports the proposed changes to the WIC food packages distributed to breastfeeding/chestfeeding women and people. The proposed updates would strengthen support for lactating mothers and people as well as their babies by creating a separate enhanced food package specifically for those who are mostly, but also don’t have to be exclusively, breastfeeding/chestfeeding to align with their high caloric needs. Breastfeeding/chestfeeding has proven health benefits for both the lactating person and their baby – breast/chest milk is the best nutritional source for most babies and can help protect them from some short- and long-term illnesses and lower their risk of asthma, obesity, type 1 diabetes and sudden infant death syndrome (SIDS).<sup>6</sup> Research has also shown that breastfeeding/chestfeeding can have positive oral health benefits for babies – one study showed that babies who were exclusively breastfed for six months were less likely to have teeth alignment issues.<sup>7</sup> Benefits also have been shown for the lactating person, including reducing their risk of breast and ovarian cancers, type 2 diabetes and high blood pressure.<sup>8</sup> Ensuring that breastfeeding/chestfeeding mothers and people have the nutritional foods they need to feed themselves is critical so that they can also feed their babies.

Despite these benefits, we know from the experience of people on our own staff and from those in our networks, that exclusively breast/chestfeeding is not always recommended or practicable – because a baby needs additional caloric intake in the form of supplemental food, professional commitments interfere with the ability to pump as much or as long as needed, or the mother’s mental health demands the use of supplemental food. We therefore enthusiastically support providing additional benefits to those parents who are breast/chestfeeding together with providing supplemental nutrition to their children.

The Children’s Campaign also strongly supports the proposed changes encouraging fruits and vegetables in the WIC food packages. The vitamins, minerals and fibers found in fruits and vegetables have many positive health benefits for children, including protecting against sickness and disease, ensuring healthy growth and development, and helping with proper digestive system functioning.<sup>9</sup> According to data from the National Health and Nutrition Examination Survey (2015-2018), 75.3% of children aged 2 to 18

---

<sup>3</sup> [WIC Food Packages Proposed Revisions Q&As | Food and Nutrition Service \(usda.gov\)](#)

<sup>4</sup> [Review of WIC Food Packages: Improving Balance and Choice: Final Report | The National Academies Press](#)

<sup>5</sup> [https://www.dietaryguidelines.gov/sites/default/files/2021-03/Dietary\\_Guidelines\\_for\\_Americans-2020-2025.pdf](https://www.dietaryguidelines.gov/sites/default/files/2021-03/Dietary_Guidelines_for_Americans-2020-2025.pdf)

<sup>6</sup> [Breastfeeding Benefits Both Baby and Mom | DNPAO | CDC](#)

<sup>7</sup> [Breastfeeding | MouthHealthy - Oral Health Information from the ADA](#)

<sup>8</sup> Ibid.

<sup>9</sup> [5 Reasons to Eat More Color Infographic | American Heart Association](#)

consumed fruits on any given day, and a little more than 90% consumed vegetables on any given day.<sup>10</sup> Despite these encouraging percentages, the data also found that percentage of children who consumed fruits and vegetables on any given day increased with income, signifying that children in households of lower incomes, including those that are WIC-eligible, are less likely to consumer fruits and vegetables. The proposed updates to the WIC food packages would provide children with double the fruits and vegetables they would receive otherwise, ensuring that children on WIC are able to access the fruits and vegetables they need to nourish their bodies.

Lastly, the Children’s Campaign strongly supports the proposed changes providing for additional flexibility, variety and choice for WIC-administering agencies and participants. These include adding more non-dairy substitute options for dairy products and expanding whole grain options.<sup>11</sup> Food security is a social determinant of health, and to adequately address social determinants of health they must be considered within the context of different cultures, identities and dietary needs.<sup>12</sup> BIPOC mothers and people and children are disproportionately represented in WIC enrollment<sup>13</sup>; therefore, it is important that food packages reflect cultural competency and are adapted to those with special dietary needs.

Roughly only 54% of children aged 0 to 18 are adhering to the dietary guidelines as developed by the FNS.<sup>14</sup> The proposed rule would help children receiving WIC food packages to meet their dietary needs and have the resources to input more healthy foods into their diets. Mothers, parents and children of lower incomes already face significant barriers to accessing healthy foods, and the updates to the WIC food packages in the proposed rule will soften those barriers in ways that can have positive outcomes for families. The Colorado Children’s Campaign strongly urges the FNS to finalize and adopt the updates in the proposed rule so WIC enrollees both in Colorado and nationwide can nourish their body and mind in ways that meet their dietary and cultural needs.

Respectfully submitted,

Hunter Nelson, MSW

*Hunter Nelson*

Policy Analyst  
Colorado Children’s Campaign  
Mobile: (720) 862-4210  
[Hunter@coloradokids.org](mailto:Hunter@coloradokids.org)

---

<sup>10</sup> [Products - Data Briefs - Number 391 - November 2020 \(cdc.gov\)](#)

<sup>11</sup> [WIC Food Packages Proposed Revisions Q&As | Food and Nutrition Service \(usda.gov\)](#)

<sup>12</sup> [Food and Nutrition Security: NCCDPHP’s Program Successes | CDC](#)

<sup>13</sup> [WIC Eligibility and Coverage Rates - 2018 | Food and Nutrition Service \(usda.gov\)](#)

<sup>14</sup> [Dietary Guidelines for Americans, 2020-2025](#)