

Allison Post, Chief  
Administration, Benefits, and Certification Branch  
Policy Division  
Food and Nutrition Service  
1320 Braddock Place, 3<sup>rd</sup> Fl  
Alexandria, VA 22314

**Re:** Proposed Rule: Special Supplemental Nutrition Program for Women, Infants, and Children: Revisions in the Women, Infants and Children Food Packages, Docket No. [FNS-2022-0007](#)

Submitted via the Federal eRulemaking Portal at <https://www.regulations.gov/>.

Dear Ms. Post:

I am writing on behalf of the Center for Law and Social Policy (CLASP) to show strong support for USDA's proposed updates to the WIC food package. WIC supports families in putting healthy meals on the table so that young children can grow and thrive.

The Center for Law and Social Policy (CLASP) is a national, nonpartisan, nonprofit organization whose mission is to advocate for policies that advance economic and racial justice. Founded more than 50 years ago, CLASP works to develop and implement federal, state, and local policies (in legislation, regulation, and on-the-ground service delivery) that reduce poverty, improve the lives of people with low incomes, tear down barriers arising from systemic racism, and create pathways to economic security. In the last several years, CLASP has strengthened our commitment to racial equity internally and externally, in all aspects of our operations, advocacy, and partnerships. CLASP develops and promotes new ideas, mobilizes others, and provides guidance to government leaders and advocates to help them implement strategies that deliver meaningful results to people across America.

## Background

Having adequate and accessible healthy, nutritious food is economic justice. WIC has helped to enhance the health and well-being of women, infants, and children by contributing to economic stability, learning and development, dietary intake, birth outcomes, and more. WIC is crucial in helping combat food insecurity and lifting millions of women, infants, and children out of poverty.

WIC has improved the health and well-being of nutritionally at-risk women, infants, and children for almost 50 years. Researchers have shown intention by investigating WIC's effects on key measures such as birth weight, infant mortality, cognitive development, use of health services, and more. A few positive findings on the program's effectiveness include:<sup>1</sup>

- WIC assists mothers in giving birth to healthier babies by approving birth weight and reducing the risk of adverse birth outcomes.
- Prenatal participation in the program lowers the chances of infant mortality.

- WIC connects mothers to health care services and resources— allowing medical facilities to easily diagnose and treat for common illnesses or complications. WIC also ensures mothers have access to immunization services.
- WIC enhances the quality of participants’ diets by providing access to nutritious foods and nutrition education.

## **The Importance of Nutrition**

The recent bump in fruit and vegetable benefits is a clear example of how additional value for the WIC benefit can help WIC shoppers purchase more varied healthy foods. WIC recipients have shared how much they appreciate the ability to purchase more fruits and vegetables for their families. During early development, it is essential families and children have access to affordable and nutritious foods. A healthy diet prepares children for learning and helps them to grow and develop to their fullest potential.

Children need a balanced diet of proteins, vitamins, minerals, and carbohydrates to fuel their everyday activities and learning moments.<sup>2</sup> Proper nutrition for children supports brain development and healthy growth, boosts immunity, strengthens bones, helps the digestive system function, and has many other positive benefits. Proper nutrition for adults has similar benefits with the addition of lowering rates of heart disease, type 2 diabetes, and some cancers.<sup>3</sup>

## **Consequences of Food Insecurity**

Unfortunately, food insecurity is common among parents and young children. Data reveals households with young children are experiencing higher rates of hunger than before the pandemic. In 2022, 23 percent of families experienced food insecurity. Families of color are greatly affected.<sup>4</sup> For example, over the past two decades, Black and Latino families have been twice as likely to go hungry as other families.<sup>5</sup> Child nutrition support is essential and needed.<sup>6</sup> Assisting parents to purchase foods they would not otherwise be able to afford allows both parents and children access to a healthy diet.

Food insecurity has adverse, long-term effects on children, impacting them in adulthood.<sup>7</sup> The detrimental effects related to lack of nutrition and child hunger include but are not limited to:

- When children do not have enough access to healthy foods, it hurts their development and leads to health problems. Financially struggling parents will have competing demands and must choose if the household income goes toward medical care for their child or feeding their family. No parent should have to choose between feeding their family or paying for medical expenses. The correlation between food insecurity and poor health raises the nation’s health care expenditures.
- Family factors such as access to food, socioeconomic status, and parents’ level of education have an enormous influence on students’ school success. When a student has low academic performance, it can lower their test scores, raise their chances of repeating a grade, and make it less likely that they will graduate from high school. Students’ academic performance is a predictor of future earnings and success.
- Child hunger can lead to behavioral issues and the need for intervention support. To make matters worse, 14 million students are learning in schools without a nurse, counselor, child psychiatrist, or social worker, but with police or resource officers.<sup>8</sup> Many schools lack trained personnel with holistic, restorative practices to defuse behavioral disruptions. This means that misbehavior driven by hunger can result in punitive responses, from suspension to police involvement.

- Parents' stress due to lack of resources and inability to provide basic needs can influence children's mental health conditions. For example, childhood depression will likely progress into adulthood if left unaddressed.<sup>9</sup>

WIC plays a critical role in helping families combat food insecurity and improving the food package will better the health of parents and children.

### **Maternal Mortality and Racial Equity**

The health and well-being of the child is directly related to the health and well-being of the mother. WIC not only provides nutritious food packages, but it also provides mothers with nutrition counseling, breastfeeding support, and access to healthcare services. Most importantly, WIC helps mothers identify potential harmful risk factors associated with maternal mortality.

The tragic event of maternal mortality is the death of a woman while pregnant or within 1 year of the end of pregnancy from any causes related to childbirth and pregnancy.<sup>10</sup> CDC reported in 2020, 861 women in the United States died from pregnancy or childbirth complications.<sup>11</sup>

Unfortunately, the maternal mortality rates for Black women are 2.9 times the rate for both White and Latino women.<sup>12</sup> Black women are three times more likely to die from pregnancy related complications than their counterparts. Closing the gap and saving the lives of Black mothers includes addressing structural racism and racial discrimination, especially in the nation's healthcare institutions.

To remain an impactful program that helps address racial inequities, WIC must continue providing an encouraging space for participants where they feel safe, supported, heard, and have access to resources.<sup>13</sup> For an agency to meaningfully engage with the individuals and communities that are most impacted—and have historically been traumatized by—benefits programs, policies, rules, processes, and operations, administrators must first acknowledge and research the racist history of these federal policies and their local implementation. Agency officials should engage in training to better understand the impact of systemic racism, implicit bias, and white supremacy to better understand current programs and regulation and their origins. Only then can agencies begin to build trust within communities that have been historically excluded and/or discriminated against.<sup>14</sup>

Often, agencies see individuals at a pivotal point in their lives when they need assistance. This may make individuals who had traumatizing experiences with administering agencies apprehensive to engage due to fear, rejection, stigma, and the possibility of being re-traumatized. Often individuals who are marginalized are not treated with respect by agencies that are supposed to serve them. Some have been met with poor customer service, dehumanizing treatment, biased opinions, and/or a cold, sterile environment.

In addition to having an improved food package, it is important to intentionally revisit and revamp the policies, operations, procedures, processes, rules, and structure of the program so that all individuals receive the best possible outcomes. With a new and improved food package that honors culture and autonomy, along with trauma informed practices, WIC will be in a great position to continue positively impacting the lives of women, infants, and children.

### **Proposed Updates to Food Packages**

USDA's proposed updates will enhance access to healthier options – like fruits, vegetables, seafood, and whole grains – by boosting benefit levels and providing greater choice among more nutritious products. Currently, Eurocentric foods are used as the standard for determining a healthy balanced diet. As a result,

a plethora of cultural foods for communities of color are not considered – or worse are stereotyped as “unhealthy.” Eurocentric foods are not necessarily healthier than other cultures.<sup>15</sup> It is important for WIC participants to have full autonomy over purchasing a food package that works for them and their family’s culture. This is particularly important for families from diverse communities who sometimes report that they are unable to purchase culturally appropriate foods with WIC benefits or have specific dietary restrictions. For example, about 75 to 95 percent of African Americans suffer from lactose intolerance.<sup>16</sup> We fully support the proposed update for more products to be approved such as plant-based dairy alternatives.

We support USDA’s efforts to:

- Make permanent the recent increases in fruit and vegetable benefit, which would provide 50% of fruit and vegetable intake recommended by the Dietary Guidelines for Americans (DGAs);
- Add seafood across the children and adult food packages;
- Enhance the variety of healthy choices for WIC families by establishing new substitution patterns that increase access to dairy and Cash Value Benefit and including a broader range of cultural whole grain options, like quinoa, teff, and blue cornmeal;
- Strengthen standards for companies that manufacture WIC-approved products – including cereals and dairy – to improve child health outcomes by increasing whole grain intake and reducing sugars and saturated fats;
- Expanding package size ranges across all food categories to allow a broader range of approved products on the grocery store shelf, thereby making it easier for parents to shop with WIC; and
- Creating a pathway for new products that are nutritionally comparable with WIC foods to be approved, such as plant-based dairy alternatives to better accommodate WIC participants with a variety of dietary preferences and allergies.

The WIC program is an essential resource for families experiencing low incomes as it provides nutritional support to those who may not have access to healthy and affordable food. The program has proven to be effective and the updates to the food package will make the program stronger and bring healthier food options to families around the nation. I urge USDA to move as quickly as possible to finalize this rule and ensure that WIC families have access to updated food packages.

Please contact Teon Hayes at [thayes@clasp.org](mailto:thayes@clasp.org) with any questions related to this comment.

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- <sup>2</sup> “Importance of Good Nutrition for all Stages of Growth in Kids,” Marine Corps Community Services, <https://usmc-mccs.org/articles/importance-of-good-nutrition-for-all-stages-of-growth-in-kids/#:~:text=A%20sufficient%20intake%20of%20healthy,to%20maintain%20a%20healthy%20weight>.
- <sup>3</sup> “Benefits of Healthy Eating,” *Centers for Disease Control and Prevention*, May 6, 2021, <https://www.cdc.gov/nutrition/resources-publications/benefits-of-healthy-eating.html>.
- <sup>4</sup> *Households With Young Children and Child Care Providers Are Still Facing Hunger*, RAPID, 2022, <https://rapidsurveyproject.com/our-research/households-with-young-children-still-facing-hunger>.
- <sup>5</sup> Areeba Haider and Lorena Roque, “New Poverty and Food Insecurity Data Illustrate Persistent Racial Inequities,” *Center for American Progress*, September 29, 2021, <https://www.americanprogress.org/article/new-poverty-food-insecurity-data-illustrate-persistent-racial-inequities/>.
- <sup>6</sup> Kailey Wilkens, “Keeping Kids Equitably Fed through Child Care,” *CLASP*, October 21, 2022, <https://www.clasp.org/blog/keeping-kids-equitably-fed-through-child-care/>.
- <sup>7</sup> Teon Hayes, “Childhood hunger does lasting harm. This new bill can help end it.” *CLASP*, August 1, 2022, <https://www.clasp.org/blog/childhood-hunger-does-lasting-harm-this-new-bill-can-help-end-it/>.
- <sup>8</sup> “COPS AND NO COUNSELORS: How the Lack of School Mental Health Staff Is Harming Students,” *American Civil Liberties Union*, <https://www.aclu.org/issues/juvenile-justice/school-prison-pipeline/cops-and-no-counselors>.
- <sup>9</sup> Juan J. Carballo, Laura Muñoz-Lorenzo, Hilario Blasco-Fontecilla, et. al, *Continuity of Depressive Disorders from Childhood and Adolescence to Adulthood: A Naturalistic Study in Community Mental Health Centers*. The Primary Care Companion to CNS Disorders, 2011, <https://doi.org/10.4088/PCC.11m01150>.
- <sup>10</sup> Pregnancy Mortality Surveillance System, Centers for Disease Control and Prevention, June 22, 2022, <https://www.cdc.gov/reproductivehealth/maternal-mortality/pregnancy-mortality-surveillance-system.htm>.
- <sup>11</sup> Donna L. Hoyert, “Maternal Mortality Rates in the United States, 2020,” National Center for Health Statistics, November 7, 2022, <https://www.cdc.gov/nchs/data/hestat/maternal-mortality/2020/maternal-mortality-rates-2020.htm>.
- <sup>12</sup> Hoyert, Maternal Mortality Rates.
- <sup>13</sup> Carolyn Barnes, Jamila Michener, and Emily Rains, “*It’s Like Night and Day*”: *How Bureaucratic Encounters Vary across WIC, SNAP, and Medicaid*, The University of Chicago Press Journals, <https://www.journals.uchicago.edu/doi/10.1086/723365#.Y-N7BXuD458.twitter>.
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