Preparing Impactful Comments: WIC Food Packages

Docket ID: FNS-2022-0007-0001 Special Supplemental Nutrition Program for Women, Infants, and **Children: Revisions in the Women, Infants, and Children Food Packages**

Deadline for Comment

February 21, 2023

Link to Comment Page

https://www.regulations.gov/document/FNS-2022-0007-0001

The online form will ask you to provide...

- 1. **Your comment:** There is no minimum or maximum length for an effective comment. You will save yourself from potential system glitches by drafting your points in a separate, saved document on your computer and then copying and pasting them into the comment field.
- 2. What your comment is about: Provide context by selecting an organization type, industry or profession from the drop-down.
- 3. (Optional) Attachments in support of your views: Provide support by attaching up to 20 files, each not to exceed 10MB. Valid file types are bmp, docx, gif, jpg, jpeg, pdf, png, pptx, rtf, sgml, tif, tiff, txt, wpd, xlsx, xml.
- 4. Your email address: In order to receive confirmation your comment has gone through.
- 5. How you want your comment classified: Chose individual, a representative of an organization or an anonymous contributor.

Tips from the experts at **Regulations.gov**

(Abridged from the Commenter's Checklist on Regulations.gov)

- Be specific: clearly identify the issue(s) on which you are commenting. If you are responding to a particular word, sentence or other element, provide a citation to the Federal Register document for specific language you address.
- Be constructive. Use facts and cite science. If you recommend an alternative to something being proposed, explain the reasoning behind your position.
- Identify your credentials and experience. If you have relevant personal or professional experience, say so. Consider including examples of how the proposed rule would affect you negatively or positively.
- Comments on the economic effects of rules that include quantitative and qualitative data are especially helpful.
- Include the pros and cons and tradeoffs of your position and explain them. Your position could consider other points of view and respond to them with facts and sound reasoning.

Sample Language and Format for Structuring Your Response

You are not limited in what you say or how you organize your points. What is important is you communicate clearly, concisely, and constructively. Here is an outline with sample language to consider as a model.

YOU SOULD	EXAMPLES AND SAMPLE LANGUAGE YOU CAN BUILD FROM
Set the stage	I/We am/are writing in response to proposed updates to the WIC food package.
Briefly establish your connection to the situation personal, professional or both. Provide credential or other qualifications.	For 25 years, I have worked with families and children to help them understand and embrace healthy eating (or) My family has farmed peanuts for five generations in southwest Georgia and I am proud of the contributions growers have made to helping make peanut allergies history (or) As a mother of a peanut-allergic child who was not aware about the potential to prevent peanut allergies through early introduction of peanut-containing foods
Identify the issue (including reference to specific language in the proposed rule) you are responding to.	The Summary section on page 71090 establishes the WIC food packages are being revised "to align them with the current Dietary Guidelines for Americanswhile promoting nutrition security and equity and taking into account program administration considerations." While the proposed changes will do much good, they fail to advance the Dietary Guidelines for Americans and evidence-based methods for preventing peanut allergies. More importantly, they do not protect children and vulnerable families from potential harm associated with the development of preventable peanut allergies. Early introduction of peanut-containing foods in the first year of life directly supports the increased consumption of affordable and accessible nutrient dense foods, reduces diet-related chronic illnesses and fosters nutrition security. It is also consistent with the WIC mission to serve those "who are at nutrition risk by providing nutritious foods to supplement diets, information on healthy eating"
Give your recommendation(s). What, specifically, would you suggest USDA do or do differently?	<i>I/We</i> urge USDA to help safeguard the health of all children by embracing and supporting the science on peanut allergy prevention. Specifically, please consider adding peanut butter to Food Package II (for infants ages 6 months through 11 months) and ensuring peanut butter is available to older children and all caregivers; providing education and training for staff and parents on current early introduction guidelines and best practices; and addressing misconceptions and other barriers — including concerns about choking, allergic reactions and the impact of introducing complementary foods on breastfeeding — to make adoption of feeding infants peanut-containing foods easy and safe.
Consider a closing that reinforces your reason for writing.	I urge USDA to reconsider the proposed rule and make the early introduction of peanut- containing foods a priority today so all children have the best start possible.