



September 17, 2019

Dr. Courtney Paolicelli  
Office of Policy Support  
Food and Nutrition Service, USDA  
3101 Park Center Drive, Room 1014  
Alexandria, VA 22302

RE: Comment Request: WIC Nutrition Assessment and Tailoring Study FNS-2019-0039-0001

Dear Dr. Paolicelli:

Thank you for the opportunity to comment on the utility of the proposed information collection for the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Nutrition Assessment and Tailoring Study. 1,000 Days supports this effort to better understand the WIC nutrition risk assessment process and the ways in which WIC clinics tailor participant benefits. Ultimately, the findings from this study can help WIC clinics across the country improve the nutrition and health of moms and babies.

1,000 Days is the leading nonprofit organization working to ensure women and children in the U.S. and around the world have the healthiest first 1,000 days. The time between a woman's pregnancy and her child's 2<sup>nd</sup> birthday offers a unique window of opportunity to build healthier and more prosperous futures. This is when a child's brain begins to grow and develop and when the foundations for their lifelong health are built. Good nutrition, in particular, plays a critical role in supporting the health and wellbeing of women and children during the first 1,000 days and beyond.

Unfortunately, too many women and young children are not getting the nutrition they need to thrive. According to analyses in the current edition of the *Dietary Guidelines for Americans*, women of childbearing age are consuming diets with too few vegetables, whole grains, fruits and other nutrient-rich foods and too much saturated fat, added sugar and sodium. About half of women in America enter pregnancy overweight or obese and/or gain excessive weight while pregnant, putting their health and that of their babies at risk. In addition, 1 in 6 babies in America is never breastfed—despite the documented short- and long-term benefits of breastfeeding for both moms and babies. Among infants in poverty, the proportion never breastfed rises to 1 in 4. Older infants and toddlers are now consuming diets that increasingly mirror the adult American diet, with too few nutrient-rich foods and too many added sugars and saturated fats. These unhealthy dietary patterns set children on a trajectory for poor diets and chronic disease later in life.

WIC plays a critical role in helping to ensure that women get the foods and support they need to deliver healthy babies and that those babies grow into healthy children. WIC provides millions of low-income families with nutritious foods, nutrition education, breastfeeding support and referrals to other services, and research shows that it works: WIC participants have healthier births, more nutritious diets, improved infant feeding practices and better health.



The nutrition assessment is a critical part of what makes WIC work. By collecting information on participants' nutrition status, risks, capacities, strengths and concerns, WIC clinics can design appropriate nutrition education and breastfeeding promotion and support, tailor the food package and make appropriate referrals. This helps ensure that participants receive assistance that meets their needs to have the greatest impact.

1,000 Days supports the Nutrition Assessment and Tailoring Study because of its potential to help improve and strengthen WIC. The findings from the study will help enhance service delivery and ensure that the program works for today's moms, ultimately improving program satisfaction and retention. This is critical in an environment in which WIC participation rates have been declining. Ultimately, when WIC coverage rates go up, more moms and babies are able to benefit from better nutrition and health during the first 1,000 days and beyond.

1,000 Days also supports FNS's plans to develop guidance for WIC staff based on the findings of the Nutrition Assessment and Tailoring Study. A standardized, reliable approach to conducting nutrition assessments would create a valuable source of data on nutrition during pregnancy and the postpartum period. Analyses of these data would help stakeholders across the country with efforts to understand and improve the nutrition and health of low-income moms and babies in America.

We encourage FNS to move forward with this proposal as well as other efforts to protect and strengthen WIC. All moms and babies in America deserve a healthy first 1,000 days. Thank you, again, for the opportunity to comment.

Sincerely,

Jenn Holcomb  
Director of U.S. Advocacy and Policy  
1,000 Days