

My name is Erin Martinez and I am the CEO of Food Equality Initiative, a nonprofit organization fighting for nutrition security and health equity for all. Thank you for the opportunity to share some thoughts and viewpoints regarding proposed changes to the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) cereal category and the potential impact these changes would have on many people utilizing WIC.

The National Academies of Sciences, Engineering, and Medicine (NASEM) has, among other recommendations, proposed revisions to the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) cereal category to require that all authorized cereals be whole grain vs. the current requirement that at least half of cereals be whole grain. This policy would effectively eliminate approximately half of the cereals offered through WIC.

Cereals at risk for elimination are made with fortified staple grains (corn and rice based), meet WIC's iron and strict sugar requirements (<6 grams of sugar per ounce), and are:

- Highly redeemed cereals that efficiently deliver the critical nutrients, iron and folate
- Culturally preferred by Hispanic consumers
- Accessible solutions for families with food allergies
- More available in the marketplace than some remaining cereals
- Enjoyed for breakfast, snacks, and in recipes

Policymakers must recognize that strictly implementing National Academy of Sciences, Engineering, and Medicine's (NASEM's) cereal recommendations could negatively affect the health of women and children by reducing WIC cereal redemption rates and affect program participation (Kellogg).

The USDA should reassess the impact of changes on cereal redemption and should work to increase whole grains within the WIC food package while maintaining fortified non-whole-grain cereals to meet the needs of those with food allergies, celiac disease, and cultural preferences. On average gluten-free foods cost 83% more than gluten-containing equivalents. Having safe and nutritious, though perhaps not 100% whole grain, cereals as WIC options will help families follow prescribed food as medicine diets.

Food Equality Initiative has provided subsidized food required to follow special diets to our program participants for 8 years now. Participants qualify for our services by being at or below 250% the federal

poverty line and diagnosed with a diet-treated condition. 53% of our program participants depend on Medicaid/medicare, 56% are female, and the majority are children. I have encountered program participants that qualify for WIC and depend on the allergen-free, gluten-free, and nutritious cereals that are part of the WIC cereal options. While whole grains can be important to a person's diet, reducing the number of options can be detrimental to those seeking food through WIC. Limiting choices does not encourage participation, there are more needs involved than just physical health, and refined grains carry more health benefits than given credit for - particularly when used in mixed settings. WIC is expanding in other categories to be more culturally and special diet inclusive, reducing access to important cereals will not benefit those utilizing WIC.

I do not advocate for cereal alone to be for breakfast, but I acknowledge that cereal also is a contributor of healthy meal patterns. Most cereals on their own contribute to a spike in blood sugar levels. WIC cereals drive consumption of other essential WIC food package foods, including fruit, milk, and protein. Cereals should and are often used for more than just breakfast, and are included to create trail mixes for healthy snacking, crushed to be used as binder in meatballs and meatloaf, as well as crushed to be used as a meat breading. Limiting the cereal choices not only impacts breakfast, but snacks and meals throughout the day. Reducing nutritious and inclusive cereal options has the potential to negatively affect nutrition intake all day.

People with food allergies and other diet-treated/managed conditions need these more "unhealthy cereals" to maintain their health, which is counterintuitive. I argue that it is not that the fortified cereals are unhealthy, it is that they are perceived as not being healthy at all. While not the most purchased category by Food Equality Initiative program participants, cereal is part of monthly food orders. This demonstrates a need for nutritious and safe cereals that are inclusive and meet families' needs. Food is a healthcare cost when managing and treating diet-treated conditions such as food allergies and celiac disease. Reducing cereal options for these populations utilizing WIC could create an increase in healthcare costs and other unintended consequences.

#### **UNINTENDED CONSEQUENCES IMPACT WIC PARTICIPANTS**

- **REDEMPTION RATES:** EBT data shows that implementing a whole-grain-rich only policy can lower cereal redemption, which is contrary to public health goals. In 2017, NASEM estimated a whole-grain-only cereal policy would result in a 10% decline in the redemption of cereal benefits. In 2021, cereal redemption in Oklahoma (where this policy has been in place for over 10 years) is 36%.<sup>7</sup> Oklahoma's 2021 redemption is 4 times more than what NASEM predicted in its 2017 report. Lower cereal redemption is a particular concern as cereal is critical to iron and folate intake and is commonly consumed with milk and fruit.

- **CULTURAL PREFERENCES:** About 40% of WIC participants identify as Hispanic/Latino<sup>8</sup>, and cereals that would be eliminated with a whole grain-only cereal policy are most popular with this population<sup>9</sup>. Eliminating these options could cause cereal redemption to decline with this group. Policymakers are required to consider cultural preference and cultural eating patterns when making changes to the program.
- **ALLERGY SOLUTIONS:** Cereals that would be eliminated serve as critical solutions for families with food allergies and sensitivities. USDA recognized this concern in its Final Rule in 2014 when they explicitly stated that the regulation “allows certain corn and rice-based cereals to be offered to participants who may have allergies to whole grain cereals.”
- **ACCESS:** Some of the cereals that would be eliminated are 3x more available in large retailers<sup>10</sup> than some whole-grain cereals. Decreased accessibility means less options are available to consumers and can discourage redemption, leading to redemption declines. Inequitable access to WIC authorized foods is especially a concern to those with food allergies and cultural preferences who rely on these food items when making WIC purchases. The cereals that would be eliminated are also popular and commonly accessible in WIC-only stores. (Kellogg)

With the White House’s recent Conference on Hunger, Health, and Nutrition and the National Strategy that came from it, we all should work together for health and maintain or increase inclusion and options of safe, nutritious cereals. The question, then, becomes

### **How can WIC participants be encouraged to make better health decisions without completely cutting cereal options?**

USDA should consider the following solutions to ensure adequate cereal choice and access for WIC participants

- Reassess the impact of NASEM cereal recommendation on redemption
- Include key fortified non-whole grain cereals
- Authorize all eligible whole grain cereals in each state
- Modernize WIC's whole grain definition
- Consider whole-grain incentive programs

(Kellogg)

I agree that the WIC offerings should include whole grains; I do not think eliminating some of the allergen-free enriched options is the best option to encourage more nutritious food selection by WIC participants. I have looked at the WIC cereals that are allergen free and whole grain. Several of the common or popular cereals fit this description, and that is applauded. What then becomes challenging is the availability of cereals in each of the states and the various stores offering WIC options. Not all stores will carry all of the cereal options. Keeping a wide variety available, instead of reducing cereal options, will help keep more WIC cereal choices on the shelves. Food Equality Initiative aims to improve health of low-income individuals and works at grassroots level to educate people about making better choices. If safe and free-from-allergens cereal options are removed from store shelves because they are not whole-grain-only, then people lose the opportunity to select safe and nutritious choices.

Some may view WIC as a handout and others view it as a leg up. However it's viewed, WIC is a resource that provides dignity through choice in grocery stores instead of food pantries. WIC is a resource that provides inclusion of cultural necessities and safe, free-from foods. WIC is a resource that provides nutritious food options to those in need. As budgets are prepared and policies updated, people must not be lost in the negotiations. Families, women, and children depend on WIC and for their health, require cereal options that are not only nutritious for them, but also safe for them. Keep dignity, inclusivity, and nutrition in the WIC program; do not move forward with NASEM's proposed limits to the cereal category.

Kellogg reference attached.



# OPTIMIZING NUTRITION SECURITY IN THE WIC CEREAL CATEGORY

## ISSUE OVERVIEW

The National Academies of Sciences, Engineering, and Medicine (NASEM) has, among other recommendations, proposed revisions to the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) cereal category to require that all authorized cereals be whole grain vs. the current requirement that at least half of cereals be whole grain. ***This policy would effectively eliminate approximately half of the cereals offered through WIC.***

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In 2022, the U.S. Department of Agriculture (USDA) is expected to update the WIC food package with this NASEM recommendation in mind. It is crucial that policy makers and the USDA consider the unintended consequences of allowing only whole grain cereals in the WIC program.

**Policymakers must recognize that strictly implementing NASEM's cereal recommendations could negatively affect the health of women and children by reducing WIC cereal redemption rates and affect program participation.**

**USDA should reassess the impact of changes on cereal redemption and should work to increase whole grains within the WIC food package while maintaining fortified non-whole-grain cereals to meet the needs of those with food allergies and cultural preferences.**

## UNINTENDED CONSEQUENCES IMPACT WIC PARTICIPANTS

- **REDEMPTION RATES:** EBT data shows that implementing a whole-grain-rich only policy can lower cereal redemption, which is contrary to public health goals. In 2017, NASEM estimated a whole-grain-only cereal policy would result in a 10% decline in the redemption of cereal benefits. In 2021, cereal redemption in Oklahoma (where this policy has been in place for over 10 years) is 36%.<sup>7</sup> **Oklahoma's 2021 redemption is 4 times more than what NASEM predicted in its 2017 report.** Lower cereal redemption is a particular concern as cereal is critical to iron and folate intake and is commonly consumed with milk and fruit.
- **CULTURAL PREFERENCES:** About 40% of WIC participants identify as Hispanic/Latino<sup>8</sup>, and cereals that would be eliminated with a whole grain-only cereal policy are most popular with this population<sup>9</sup>. Eliminating these options could cause cereal redemption to decline with this group. Policymakers are required to consider cultural preference and cultural eating patterns when making changes to the program.
- **ALLERGY SOLUTIONS:** Cereals that would be eliminated serve as critical solutions for families with food allergies and sensitivities. USDA recognized this concern in its Final Rule in 2014 when they explicitly stated that the regulation "allows certain corn and rice-based cereals to be offered to participants who may have allergies to whole grain cereals."
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## ROLE OF CEREAL IN WIC

Fortified non-whole-grain cereals provide crucial nutrients to WIC participants and contribute to the establishment of healthful meal patterns.<sup>1,2</sup>

- Cereal was originally included in the WIC food package to provide iron to prevent and treat iron deficiency anemia, which is critical to child and maternal health and is still a concern today. In the U.S., 77% of breastfed infants have inadequate iron intake during the second half of infancy.<sup>1</sup> To address this gap, WIC requires cereal to contain a minimum of 28 milligrams iron per 100 grams.
- Adequate intake of folate-rich foods is also important prior to and during pregnancy. Folate intake enables healthy pregnancy outcomes by reducing a woman's risk of having a child with neural tube defects<sup>3</sup>.

***Ounce for ounce, cereal is the largest contributor of iron and folate within the WIC food package.***

Cereal also is a contributor of healthy meal patterns. WIC cereals drive consumption of other essential WIC food package foods, fruit and milk.

### Cereal is:

- The #1 source of folate and iron in kids and adults' diets<sup>4</sup>
- The #2 source vitamin D and magnesium to kids' diets<sup>4</sup>
- Most often eaten with milk<sup>5</sup>
- The food item that fruit is most added to<sup>6</sup>



## Optimizing Nutrition Security in the WIC Cereal Category

**"For many participants, however, some foods may not align with personal or cultural preferences, leading to reduced redemption and consumption."**

***NASEM, 2017 Review of WIC Food Packages: Improving Balance and Choice: Final Report***

*USDA should consider the following solutions to ensure adequate cereal choice and access for WIC participants*

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Authorize all eligible whole grain cereals in each state

Modernize WIC's whole grain definition

Consider whole-grain incentive programs

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