



December 22, 2022

WIC Administration  
Benefits, and Certification Branch  
Policy Division  
Food and Nutrition Service  
U.S. Department of Agriculture  
1320 Braddock Place, 3rd Floor  
Alexandria, Virginia 22314

**RE: Proposed Rulemaking-- Special Supplemental Nutrition Program for Women, Infants, and Children: Revisions in the Women, Infants, and Children Food Packages (FNS-2022-0007-0001)**

Dear Allison Post,

First 5 Alameda County (First 5) submits this comment in **strong support of the proposed updates** to the food packages issued through the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). The WIC program supports families with access to healthy foods that allow young children to grow and thrive. The proposed increase to the fruit and vegetable cash-value benefit and food package enhancements which add seafood, additional wholegrains, and new substitution options will ensure that families have a wide range of healthy food options that accommodate personal and cultural food preferences. **We encourage the United States Department of Agriculture (USDA) to quickly finalize the changes to the WIC program as proposed in FNS-2022-0007-0001 as a strategy to reduce ethnic and racial inequities in maternal-child health and nutrition outcomes.**

First 5 was established in 1998 by California's Proposition 10. Our role is to improve life outcomes for Alameda County's youngest children. We support, inform, and partner with public systems (i.e., health, early care, and education, economic, and family supports) and community resources to create an early childhood system of care that is responsive to the needs of caregivers and families with young children.

Since 2008, First 5 has benchmarked results for our county's children by conducting a biannual [Kindergarten Readiness study](#). Results have shown very little improvement over time and consistently point to the countervailing impact of socioeconomics, community conditions, and limited enrollment in early education as barriers to kindergarten readiness. Findings from our most recent assessment, a participatory research project that surveyed over 3000 parents/caregivers, early care and education professionals, TK, and Kindergarten teachers in Alameda County, show that child health & well-being and a family's access to basic needs are associated with school readiness. In alignment with the proposed WIC updates, our study's recommendations to support kindergarten readiness point at efforts that:

- increase children's access to quality meals; and
- affirm and respond to the cultural and language needs of communities to address inequities and mitigate current experiences of discrimination.

# FIRST 5



Healthy thriving communities are crucial for developing young minds and family well-being. First 5 investments, programs, and advocacy efforts target many children and families who benefit from the WIC program. According to the U.S. Census Bureau, approximately 1 in 10 children under age 6 in Alameda County lives with a family earning below the Federal Poverty Level. The proposed food package enhancements and increase in benefit amount will help mitigate the number of children experiencing food insecurity and strengthen nutritional outcomes for breastfeeding parents and young children. Programs like WIC have been shown to alleviate poverty, reduce adverse birth outcomes, and improve nutritional health.

In conclusion, **First 5 strongly supports the changes proposed by USDA to improve the WIC food packages** and encourage USDA to finalize this rule as quickly as possible so that WIC can issue the new food packages to participants across the country.

Sincerely,

A handwritten signature in blue ink that reads "Kristin Spanos".

Kristin Spanos  
Chief Executive Officer  
First 5 Alameda County