

September 6, 2022

Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Dear Secretary Vilsack:

On behalf of MANA, a National Latina Organization, and the oldest and largest Hispanic women's organization in the country, I am reaching out to share some of our communities' perspectives about the Women, Infants and Children (WIC) program. As you may know, our organization was founded to give Mexican American, and now all women of Hispanic/Latin descent, a needed voice in national discourse.

It is in this role that I write to you as we are concerned some changes to the WIC food package, while meant for good, could result in health consequences for Hispanic families that are detrimental. As the Administration works toward health equity for all, it is critical that policy changes reflect cultural preferences and needs.

Specifically, it is our understanding that USDA may consider the National Association of Science, Engineering and Medicine (NASEM) 2017 recommendation to require that "all breakfast cereals must meet the whole grain-rich criteria."¹ This recommendation runs contrary to the cultural dietary preferences of the Latino families we serve, could limit the accessibility of approved products, and risks unintended health consequences. We consider this a significant departure from the current rule which provides that at least one-half of breakfast cereals be whole-grain rich.² The current rule allows the women and families we represent to use their benefits to purchase certain non-whole grain cereal choices they trust and depend upon to feed their families. The 2017 NASEM report specifically says that "some foods (e.g., fluid milk, ready-to-eat cereals) may not align with personal or cultural preferences, leading to reduced redemption and consumption."³ This statement demonstrates the authors' awareness that the whole grain-only cereal recommendation, among others, will have consequences. This should give USDA pause.

While we understand non-whole grain cereals could still be purchased with non-WIC money, this must be put into a context where 1 in 5 Black and Latino adults and children, according to USDA's Equity Action Plan,⁴ reported food insecurity. In other words, these families have such

¹ National Academies of Sciences, Engineering, and Medicine (NASEM), [Review of WIC food packages: Improving balance and choice: Final report \(2017\)](#) (Washington, DC: The National Academies Press), doi: <https://doi.org/10.17226/23655>, p. 7.

² [NASEM 2017](#), p. 28, note l.

³ [NASEM 2017](#), p. 2.

⁴ [USDA Equity Action Plan](#), February 10, 2022, p. 11.

limited income they may not have the option to include nutritious, cultural family favorites as they strive to put enough food on the table.

Hispanic families strongly prefer corn and other non-whole grain products, such as rice and amaranth, over whole grain.⁵ Additionally, whole grain cereal options may be limited in small retail establishments and food desserts. Grocery retailers in these areas can carry very few whole grain cereals for WIC families, opting instead to sell the more popular non-whole grain cereals. For these reasons, we are concerned that a whole grain-only cereal policy would lead to reduced WIC redemption and consumption of breakfast cereals among Hispanic women and children. This would be a serious concern given that cereal is the primary source of folate and iron in the diets of both adults and children.⁶ In fact, breakfast cereal is the top source of not only folate and iron but also thiamin, riboflavin, niacin, vitamin B6, zinc, vitamin B12, vitamin E and vitamin A at breakfast.⁷ Cereal is most often eaten with milk,⁸ the second highest source of vitamin D and magnesium to the diets of children,⁹ and the food fruit is most often added to.¹⁰ In addition, these breakfast cereals are not only eaten at breakfast, but are also used in family favorite recipes.

As stated earlier, we are quite concerned that this policy could result in unintended health consequences for Hispanic families which could end up being more detrimental than the intended benefits. We ask that USDA use a more equitable lens when reviewing the Women, Infants and Children (WIC) program food package changes. The nuance required to develop equity-based health solutions is critical to families nationwide as they struggle to maintain health and nutrition.

Sincerely,



Amy L. Hinojosa
President and CEO
MANA, A National Latina Organization

⁵ USDA Agricultural Research Service, cited by Pierce Hollingsworth, "[Hispanic Foods](#)," *Food Technology Magazine*, January 1, 2003.

⁶ Centers for Disease Control and Prevention (CDC) National Center for Health Statistics (NCHS), *National Health and Nutrition Examination Survey Data* (Hyattsville, MD: U.S. Department of Health and Human Services, CDC), 2009-2018.

⁷ Toby Amidor, MS, RD, CDN, "[Why Are Cereal Companies Changing Their Fortified Nutrients?](#)" *U.S. News & World Report*, March 16, 2020.

⁸ Song, WO, OK Chun, J Kerver, S Cho, CE Chug, S Chung. Ready-to-eat breakfast cereal consumption enhances milk and calcium intake in the US population. *J Am Diet Assoc*: 2006;106:1783-1789.

⁹ Centers for Disease Control and Prevention (CDC) National Center for Health Statistics (NCHS), *National Health and Nutrition Examination Survey Data* (Hyattsville, MD: U.S. Department of Health and Human Services, CDC), 2009-2018.

¹⁰ Produce for Better Health Foundation State of the Plate. 2021; Michels N, De Henauq S, Beghin L et al. Ready-to-eat cereals improve nutrient, milk, and fruit intake at breakfast in European adolescents. *Eur J Nutr*. 2016;55:771-779.