



Reply to  
Attn. of: SF-126

FEB 10 1992

Subject: Policy Memorandum 92-3  
Breastfeeding Support During Certification and Food Package Issuance

To: Regional Directors  
Supplemental Food Programs  
All Regions

Based on information received from a variety of sources, we believe WIC State and local agency staff need to provide additional support for breastfeeding at the time of certification and food package issuance in the following areas:

- o providing complete information to participants on WIC benefits for breastfeeding women;
- o resisting the distribution of unwanted infant formula to breastfeeding women; and,
- o obtaining the cooperation of retailers in not redeeming unused infant formula for WIC participants.

We realize that this is not a problem in all sites and we continue to be impressed by the hard work and achievements of WIC State and local agencies in many areas of breastfeeding promotion and support.

Providing Information to Participants on WIC Benefits to Support Breastfeeding Women

Focus groups with WIC participants conducted by the Breastfeeding Incentive Demonstration Project grantees indicated that many WIC participants were not aware of the special consideration and benefits the breastfeeding woman receives from the WIC Program. When a pregnant woman is certified, WIC local agency staff should emphasize that:

- o Breastfeeding women are at higher level in the priority system than non-breastfeeding, postpartum women, and are more likely to be served than postpartum women when local agencies do not have the resources to serve all individuals who apply for the WIC Program.
- o Breastfeeding women may receive WIC benefits for up to 1 year while non-breastfeeding women are eligible for only 6 months postpartum.
- o WIC offers a greater variety and quantity of food to breastfeeding participants than to non-breastfeeding, postpartum participants. (This point will be especially important to emphasize when the enhanced breastfeeding woman's package is finalized.)

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These benefits, especially the greater amount of food, can be presented as additional incentives to breastfeed. At the very least, postpartum WIC participants should fully understand the full range of program benefits available to them regardless of their choice of infant feeding method.

#### Inappropriate Distribution of Unwanted Infant Formula

It has come to our attention that some WIC local agencies are inappropriately providing infant formula to breastfeeding participants who do not want or need it. This concern has been raised at State agency meetings and has also been discussed directly with the Assistant Secretary for Food and Consumer Services by concerned WIC managers. On a more personal level, we recently received a letter from a former participant who was quite critical of the Program for undermining her decision to breastfeed by encouraging her to accept infant formula (copy attached). The distribution of free samples to women who have chosen to breastfeed should also be discouraged. Both of these practices undermine the hard work of many WIC staff to promote and support breastfeeding in WIC.

WIC staff at various levels have expressed the belief that by issuing infant formula, money is saved for the Program in the form of the rebate. We would like to clarify that infant formula rebates do not generate any new monies for the Program; the rebate only lowers the total cost of infant formula, which still must be absorbed by the Program. In sum, unwanted formula distributed is money lost.

#### Obtaining the Cooperation of Retailers in not Redeeming Unused Infant Formula for WIC Participants

Another problem that has been brought to our attention on many occasions is that some WIC participants have been receiving cash in return for infant formula, particularly unopened cases, at local stores. We encourage States to make major retail chains in their areas aware of the negative effects of this practice. A "no-questions asked" policy, while commendable from a consumer services standpoint, encourages the inappropriate diversion of WIC benefits and may place infants who should be receiving this formula at significant nutritional risk. We realize that this is a difficult issue because implementation of an exchange policy requiring a cash register receipt will affect all consumers, not just WIC participants. However, we believe that if properly explained to retailers, retail grocer associations and drug store chains, States can expect to obtain a high level of cooperation in this matter.

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We would appreciate your assistance in re-emphasizing to State agencies the importance of encouraging and supporting the decision of WIC participants to breastfeed by providing complete information at the time of certification, by not issuing unwanted or unneeded infant formula to the breastfeeding woman, and we also need to strongly discourage the redemption of infant formula by local retailers without a cash register receipt.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Vogel', written over the word 'Sincerely,'.

RONALD J. VOGEL  
Director  
Supplemental Food Programs Division

Attachment

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Janet Tognetti, EdD  
Jay D. Hirschman, MPH  
Joan E. McLaughlin, PhD  
Office of Analysis and Evaluation  
Food and Nutrition Service  
USDA  
Alexandria, VA 22302

January 15, 1992

Dear Ms Tognetti et al.,

I was recently forwarded a photocopy of your letter published in Pediatrics Vol. 88 No 4 (Oct. 1991) by a physician friend who is aware of my concerns about breastfeeding and the WIC program. As a former participant who has experienced at first hand continued pressure from WIC personnel to use formula, AND HAS RESISTED THAT PRESSURE, I decided to write to you in response to your self-serving justification of the program.

I have been a WIC participant twice, at times when our family's financial situation made that extra help quite welcome. Prior to my participation, I had successfully nursed one child, and was exclusively nursing my second. I was attending Law School part time, having become totally disillusioned with Medical School and withdrawn after two years. (By the way, one of my disputes with that Institution involved my "ridiculous" insistence on taking a nutrition course during my enrollment, as an elective.) I probably did not fit the Program's stereotype of a poor, uneducated, ignorant woman, who has never nursed before. It was for those very reasons that I was able to withstand the pressure placed upon me by WIC staff to use formula.

When I first approached the WIC Program in 1985, I made it very clear to staff that my 6 month old was only in need of juice and cereal, and that I did not wish to use any formula as my milk supply was quite adequate and our family has many allergic individuals in it. Despite my request, the first package came through with "supplemental" formula, which was only dropped after I screamed loudly enough. I am highly ethical; otherwise I would have done what some other "exclusive nursers" who have been too nice to argue have, and turned in the formula at Target for credit to buy something USEFUL!

While my children were still on the Program, I became pregnant for a third time. Thus, since I had been slightly anemic post-partum, I was on the Program as a Pregnant woman. Perhaps it was because staff knew that I knew about nursing, but I received absolutely no education about the benefits of breastfeeding while on the program. To the contrary, about a month or two before my due date, I was again told that I did want to supplement with formula, didn't I? Of course I said "no," (Well, actually, "Hell, no!") and the staff knew enough to leave me alone. My baby was born over two weeks post-dates, healthy, 19 inches and nine pounds even, and nobody asked me again if I wanted to supplement him. Nobody said anything positive about my decision to breastfeed, either. Shortly after Sam's birth in late 1986, our income increased, and I terminated from the program.

In early 1989 I again became eligible for the program, after I lost my

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job, our fourth child was born, and we lost our medical insurance. I had just begun taking my children to the Health Department Pediatric Clinic, and intended to apply for my two year old son and myself, as the tandem nursing mother of a cows milk sensitive two year old and a four month old.

The staff immediately said: "That will be three of you."

I stated: "No, the baby is not old enough for juice or cereal yet."

Staff said, "But you will want to supplement her, won't you?"

I asked: "At four months old and over seventeen pounds, does she look like she NEEDS supplementation? I have exclusively nursed three other children until they were old enough for other food, and I don't intend to quit now."

We remained on the Program for about a year, and during that time I was not hassled about my breastfeeding, except to be told that nursing past a year was not sanctioned by the Program and my participation would be terminated. I am still nursing my three year old, despite WIC disapproval. (The average age of weaning from the breast through much of the rest of the world is past four years.)

As recently as early 1991 I have had to advocate for another participant who was being pressured to "supplement" a severely allergic baby with formula, simply because this baby, whose father was only 5'6" and 130 pounds, "wasn't big enough." I suspect WIC staff should have some inservice on genetic factors in body size, as well as basic statistics (i.e. not everyone should be at the fiftieth percentile or above.)

I am aware that Minnesota and other WIC programs have had special fee arrangements with some formula manufacturers, through which the states get a \$.25 rebate for each can purchased with vouchers. It is my opinion that such arrangements are antithetical to breastfeeding promotion, and provide great incentive for staff to encourage formula use, even where unnecessary or potentially harmful. My experience certainly does not provide me with any reason to believe that "[the U.S.D.A.] . . . has been working actively to promote breast-feeding among participants," as stated in your letter, but that the opposite has been true.

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