



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

DATE: August 19, 2025

SUBJECT: WIC Policy Memorandum #2025-5
Implementing Revisions to the WIC Food Packages: Flexibilities to
Support Healthy Choices, Healthy Outcomes, and Healthy Families

To: Regional Directors
Supplemental Nutrition Division
All Regional Offices

WIC State Agency Directors
All WIC State Agencies

USDA's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) is proven to improve the nutritional health of its participants—pregnant and breastfeeding women, women who recently had a baby, infants, and children up to 5 years of age. WIC provides minimally processed, healthy foods specifically prescribed to support growth and development during those critical life stages. Nutrition education, breastfeeding support, and healthcare referrals are also included.

This memo clarifies State agency flexibility to implement changes to the WIC food packages in ways that support the Trump Administration's commitment, under the leadership of USDA Secretary Brooke Rollins, to encourage healthy choices, healthy outcomes, and healthy families through the federal nutrition programs.

Background

On April 18, 2024, FNS published the *Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Revisions in the WIC Food Packages* final rule (which will be referred to throughout this document as the final rule). The revised WIC food packages support participants' health by better promoting and supporting the establishment of successful, long-term breastfeeding; providing WIC participants with a wider variety of

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foods including fruits, vegetables and whole grains; and providing WIC State agencies with more options to accommodate each WIC participant's individual needs.

Implementation Flexibilities

State agencies have flexibility to implement the WIC food packages changes in ways that meet their participants' unique nutritional needs, reduce administrative burden for WIC staff, and minimize program costs, thereby protecting the investment of American taxpayers.

Implementation Timelines

State agencies have until April 20, 2026, to implement most of the changes in the final rule. (Vitamin D supplementation in yogurt has an extended implementation date of April 19, 2027.) [WIC Policy Memorandum #2024-5](#) encourages State agencies to implement changes before implementation deadlines. In doing this, State agencies may:

- Phase-in the revised WIC food packages on a participant category basis. For example, changes to food packages for children ages 1-4 years may be implemented on a different schedule than changes to food packages for pregnant participants.
- Implement any changes that expand substitution options State agency-wide (e.g., additional whole grain options) at any time, including before implementing any food package-specific changes.

Whole-Grain Cereal

Whole grains contain a variety of nutrients, including fiber, and are an important part of a healthy diet. The revised WIC food packages require that 75 percent of breakfast cereals meet whole grain criteria, allowing State agencies to provide a wide variety of whole grain cereals along with some non-whole grain options. State agencies have

flexibility and are encouraged to support healthy choices by making more than 75 percent of the breakfast cereals offered whole grain.

Substitution Options

While all WIC foods must align with program requirements, State agencies have significant flexibility to determine the brands, types, and forms of WIC-eligible foods to authorize for their state food list. Further, while State agencies are required to authorize certain substitutions to ensure all WIC families receive a package of healthy foods, they have the choice to offer additional substitution options.

State agencies are encouraged to consider ways these flexibilities and options can best support healthy outcomes for WIC participants. Attachment A provides a high-level summary of these requirements (see [7 CFR 246.10](#) for full requirements) and available State agency options.

We appreciate your commitment to the successful and timely implementation of the revised WIC food packages and, in turn, are committed to supporting you in this effort. The [Changes to the WIC Food Packages Q&As](#) offer clarification on a variety of the changes, and Attachment B can help answer additional questions about flexibilities available to State agencies when implementing the revised WIC food packages.

State agencies may direct any questions to their respective [FNS Regional Office](#).

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State Agency Options and Select Federal Requirements

State agencies are responsible for identifying the brands, types, and forms of WIC-eligible foods, including substitution options, to authorize for their state food list and must include more than one product for most WIC food categories. While State agencies have flexibility and options when making these determinations, they are required to authorize certain substitution types and forms to ensure WIC families are receiving a package of healthy foods.

The table below provides a high-level summary of certain requirements (see [7 CFR 246.10](#) for full requirements) and available State agency options. All foods authorized must meet federal minimum nutrient requirements in [7 CFR 246.10\(e\)\(12\)](#); State agencies may also establish additional criteria per [7 CFR 246.10\(b\)\(1\)\(i\)](#).

Food Category	Federal Requirement	State Agency Option
Cow's Milk	<p>Required Substitution: N/A</p> <p>If authorized, when substituting cheese for milk, State agencies may not eliminate the “dangling quart” as a cost-containment measure. States may issue half gallon containers every other month to contain costs.</p> <p>More-than-one provision: N/A Satisfied by the two types that regulations require.</p> <p>Types: Unflavored cow's milk and lactose-free milk</p>	<p>Substitution Options:</p> <ul style="list-style-type: none"> • Dairy and plant-based cheese • Dairy and plant-based yogurt (flavored or unflavored) • Plant-based milk alternatives (flavored or unflavored) • Tofu <p>Forms: fluid, shelf-stable, dry, or evaporated</p> <p>Types: cultured, acidified, UHT, goat</p> <p>Organic</p> <p>Additional State agency criteria</p>
Juice	<p>Required Substitution: Cash value-voucher/benefit (CVV/B)^{1,2}</p>	<p>Substitution Option: N/A</p> <p>Forms: fresh, concentrated, frozen, canned, or shelf stable</p>

Food Category	Federal Requirement	State Agency Option
Juice	More-than-one provision: At a minimum, the State agency must authorize more than one variety of juice (e.g., orange, tomato, etc.).	Types: single varieties (orange) and blends (orange-pineapple) Combinations of single-strength and concentrated juices may be issued provided that the total volume does not exceed the maximum monthly allowance (MMA) for single-strength juice. Organic Additional State agency criteria
Breakfast Cereal (ready-to-eat and instant and regular hot cereals)	Required Substitution: N/A More-than-one provision: At a minimum, the State agency must authorize more than one cereal grain (whole wheat, oat, corn, etc.). At least 75 percent of cereals on the State Authorized Foods List (AFL) must meet whole grain criteria.	Substitution Option: N/A More than 75 percent of cereals on the State AFL can meet whole grain criteria (up to 100 percent). Organic Additional State agency criteria
Whole Wheat Bread, Whole Grain Bread (includes buns and rolls)	Required Substitution: N/A More-than-one provision: At a minimum, the State agency must authorize more than one of these breads (i.e., whole wheat bread and whole grain bread, or whole wheat bread and 100% whole wheat rolls).	Substitution Options: Authorize any of the whole grain options listed in Table 4 (7 CFR 246.10(e)(12)) Additional State agency criteria
Fruits and Vegetables (CVV/B)	Required Substitution: N/A More-than-one provision: N/A Forms: Fresh and one other form (dried, frozen, canned) Organic May not selectively choose which WIC-eligible fruits and vegetables to authorize.	Substitution Option: N/A Forms: Authorize more than two forms. Authorize fresh herbs ³ Authorize larger package sizes of fresh produce Additional State agency criteria

Food Category	Federal Requirement	State Agency Option
Eggs	Required Substitutions: <ul style="list-style-type: none"> • 1 pound dry or 64 oz canned mature legumes • 18 oz peanut butter More-than-one provision: N/A	Substitution Options: <ul style="list-style-type: none"> • 1 pound of tofu • 18 oz nut or seed butters Forms: fresh shell, dried, liquid; hard boiled (for homeless only) Organic Brown or other eggshell colors Size (medium, large, etc.) Additional State agency criteria
Peanut Butter	Required Substitution: 1 pound dry or 64 oz canned mature legumes More-than-one provision: N/A	Substitution Option: 18 oz nut or seed butter Organic Additional State agency criteria
Mature Legumes (beans and peas)	Required Substitution: 18 oz peanut butter More-than-one provision: At a minimum, the State agency must authorize more than one type of legume (e.g., black beans and kidney beans). Forms: Dried and canned	Substitution Option: 18 oz nut or seed butter Type: Baked beans - only for participants with limited cooking facilities. Organic Additional State agency criteria
Canned Fish	Required Substitution: N/A More-than-one provision: At a minimum, the State agency must authorize more than one variety (e.g., salmon and light tuna).	Substitution Option: N/A Types: Boneless or skinless, added sauces and flavorings (e.g., tomato sauce, mustard). Packed in water or oil Wild-caught or farm-raised Additional State agency criteria

Food Category	Federal Requirement	State Agency Option
Infant Cereal (6-11 months)	Required Substitution: N/A More-than-one provision: At a minimum, the State agency must authorize more than one cereal grain (e.g., oat and multi-grain).	Substitution Option: N/A Organic Additional State agency criteria
Infant Food Fruits and Vegetables (6 – 11 months)	Required Substitution: N/A More-than-one provision: At a minimum, the State agency must authorize more than one variety of infant fruits (e.g., apples and pears). A combination of two or more types (e.g., apple-banana) is considered one variety. At a minimum, the State agency must authorize more than one variety of infant vegetables (e.g., butternut squash and sweet potato). A combination of two or more types (e.g., carrots-peas) is considered one variety.	Substitution Option (applies to both infant fruits and infant vegetables, e.g., cannot apply only to fruits): <ul style="list-style-type: none"> • 64 oz of infant fruits and vegetables and a CVV/B⁴ or • No infant fruits and vegetables and a larger CVV/B (relative to the CVV/B provided for half of infant fruits and vegetables) A State agency exercising the CVV/B substitution option must authorize fresh and at least one other form (frozen or canned). ⁵ Organic Additional State agency criteria
Infant Meat (6-11 months)	Required Substitution: N/A More-than-one provision: At a minimum, the State agency must authorize more than one variety (e.g., chicken and beef).	Substitution Option: N/A Allowing added broth or gravy Organic Additional State agency criteria

WIC Food Packages Flexibility Q&As

General Flexibilities:

1. **Question:** Does the option for WIC State agencies to authorize additional product package sizes that provide less than the full maximum monthly allowance (MMA) apply to all foods?

Answer: The State agency option to authorize additional product package sizes that provide less than the full MMA applies to all WIC-eligible foods except formula. WIC State agencies must continue to authorize products that provide the full MMA amounts available to participants. This means that at least one package size, or a combination of sizes, must add up to the MMA for all food packages.

2. **Question:** Do State agencies have discretion to set up food package issuance in their Management Information Systems (MIS) to reduce administrative burden in the clinic and maximize participant choice and flexibility at the store?

For instance:

- a. May State agencies set up food packages in their MIS so that participants can select substitutions within a food category at the store (also known as “broadbanding”)?
For example, issuing broadbanded legumes would allow participants to choose between beans, peanut butter, and if allowable by the State, nut and seed butter at the store.
- b. May State agencies set up food packages that include commonly issued substitutions? For example, a default food package could include cheese and yogurt in place of only milk.

Answer: Yes. State agencies have discretion to set up food packages within their MIS to maximize administrative efficiencies and improve the participant experience. The scenarios described in both a. and b. above are allowable. State agencies may issue a food category as broadband to allow for more choice at the store, and they may set up “pre-tailored” food packages that reflect commonly chosen substitution options. The MIS must be flexible and allow WIC staff to further tailor (i.e., modify) a participant’s food package to align with their needs and preferences.

Regardless of how the State agency sets up their MIS, all food package issuance and tailoring must be based on a nutrition assessment, which serves as the basis for all other WIC nutrition services. All participants must be informed of the maximum monthly allowance and substitution options of each food category (7 CFR 246.10(b)(2)(ii)(A)). Knowing how a participant plans to substitute foods can help WIC staff provide more effective nutrition education.

- 3. Question:** The WIC food packages final rule allows smaller package sizes to be authorized as long as there is an option for WIC participants to redeem their full maximum monthly allowance (MMA) of WIC foods. For example, there is a brand that has some milk packages that come in a 59 fluid ounces size. Would this be an allowable package size to be WIC approved since other milk options are available in a 64 fluid ounces size and it will be up to the participant to decide which package size to redeem?

Answer: Yes, but only as long as the full maximum monthly allowance (MMA) is made available to participants. The State agency option to authorize additional product package sizes that provide less than the full MMA applies to all WIC-eligible foods except WIC formula. State agencies must continue to authorize products that provide the full MMA amounts available to participants. This means that at least one package size, or a combination of sizes, must add up to the MMA for all food packages. So, in the example mentioned, milk in 59 fluid ounce containers could be authorized along with milk in 64 fluid ounce containers.

If a State agency exercises the option to authorize additional package sizes that don't equal or add up to the full MMA, the local agency must inform participants about the MMA of authorized supplemental foods, consistent with the regulations at 246.10(b)(2)(ii)(A), 246.11(a)(1). As an example of how to satisfy this requirement, a local agency may explain which authorized foods would allow the participant to redeem the full monthly benefit amount as part of participant education.

Fruits & Vegetables:

- 1. Question:** We only authorize fresh fruits and vegetables for purchase with the cash-value benefit (CVB) and had been planning to change to add frozen and canned. We'd like to implement adding frozen and canned across all the categories (women, children, and infants) at the same time. Can we make that change across all participant categories without making all the other changes for children and women?

Answer: Yes, State agencies may authorize canned and frozen forms at any time for adult and child participants since regulations prior to the final rule allowed WIC State agencies to authorize one or more of the forms in addition to fresh (canned, frozen, and dried) for adult and child participants.

- 2. Question:** At what age can infants have a cash-value benefit (CVB)?

Answer: The CVB substitution for infant fruits and vegetables is a WIC State agency option that can be offered beginning at 6 months of age through 11 months of age. At age 1 year, the participant would then be recertified as a child and receive Food Package IV, which includes a standalone CVB.

Juice:

1. **Question:** Does the final rule allow State agencies to provide smaller juice container sizes than the 64-ounce container size?

Answer: Yes, but only as long as the full maximum monthly allowance (MMA) is made available to participants. It is a State agency option to authorize additional product package sizes that provide less than the full MMA, which applies to all WIC-eligible foods except WIC formula. Since this package size flexibility is a State agency option, WIC State agencies may differ in the product sizes they authorize.

Whole Grains:

1. **Question:** For the requirement that 75 percent of breakfast cereals on a State agency food list be whole grain, how do State agencies count and consider the number of whole grain cereals versus total cereals? For different flavors of the same cereal, e.g., honey roasted, almonds, cinnamon, and vanilla. Is this counted as one or four?

Answer: Different varieties or flavors of the same cereal can be offered and counted separately if they individually meet the minimum federal specifications outlined in 7 CFR 246.10(e)(12).

It's important to remember that the purpose of this flexibility is to offer a wide variety of grains. Different store brands of the same cereal, however, should count as one cereal. For example, if a State agency authorizes a name-brand bran flakes and three different store brand alternatives (for a total of four bran flakes options), the State agency should count the name-brand bran flakes as one whole grain option and the three store brand versions of bran flakes, combined, as a second whole grain option. Each cereal should be evaluated individually to ensure it meets whole grain criteria as well as iron requirements and added sugar limits.

2. **Question:** What type of grains besides rice can be offered?

Answer: Whole grain options include brown rice, wild rice, quinoa, bulgur, oats, whole-grain barley, millet, triticale, amaranth, cornmeal (including blue), corn masa flour, whole wheat macaroni (pasta) products, whole wheat bread products (e.g., pita, English muffin, bagels, naan), soft corn or whole wheat tortillas, buckwheat, teff, kamut, or sorghum, wheat berries, and other intact whole grains (red rice, black rice, freekeh, spelt, farro, etc.).

3. **Question:** Can a State agency approve grits, polenta, and masa harina flour that have corn as the only ingredient as a whole grain? Some masa harina and other corn products are made with just corn and lime/trace of lime; can a State agency add products that contain just corn and lime?

Answer: Corn grits and polenta may be WIC-eligible if the form of corn used is a whole grain (and does not contain added sugars, fats, oils, or salt (i.e., sodium)). State agencies may allow grits and polenta if they verify that the only ingredient is intact whole corn grain, either

by reviewing the product's ingredient list or requesting product information from the manufacturer for confirmation. "Corn," "degerminated corn meal," and "degermed corn" are not whole grain forms. Masa harina flour is a WIC-eligible whole grain. "Lime" and "trace of lime" listed in the ingredient list of masa harina flour is an allowable ingredient, as the lime is an alkaline solution used in processing the corn.

4. Question: Are sprouted rolled oats allowable?

Answer: Yes. State agencies have the option to identify and authorize other intact whole grain options without added sugar, fats, oils, or salt (i.e., sodium) including sprouted rolled oats.

Nut and Seed Butters:

1. Question: What seed butters align with the protein and iron requirements? What does it mean for nut and seed butters to be 'nutritionally equivalent' to peanut butter? Is there a range or percent that nut or seed butter must be within? For reference here is a chart that includes both protein and iron content per 2- tablespoon (32g) serving for the nut or seed butters:

Nut/Seed Butter | Protein (g) | Iron (mg)

Peanut Butter | 8 | 0.6

Almond Butter | 7 | 1

Cashew Butter | 5 | 2

Sunflower Seed Butter | 6 | 1.5

Soy Nut Butter | 7 | 1.5

Pumpkin Seed Butter | 9 | 4

Hemp Seed Butter | 10 | 4

Answer: To better accommodate participants' special dietary needs, cultural practices, and personal preferences, State agencies may authorize nut and seed butters that are nutritionally *comparable* – but not necessarily *equivalent* – to peanut butter. When doing so, State agencies have discretion to determine which products are nutritionally comparable and should consider the amounts of macronutrients (e.g., protein) and [key micronutrients](#) (e.g., iron) provided.

2. Question: Is tahini allowed as a seed butter?

Answer: State agencies have discretion to determine which nut and seed butters, including tahini, to authorize as peanut butter substitutes. When choosing WIC-eligible nut and seed butter substitutions that are nutritionally comparable to peanut butter, State agencies should consider the amounts of macronutrients (e.g., protein) and key micronutrients (e.g., iron) provided.

Milk/Milk Alternative:

1. **Question:** Can a State agency exclude a plant-based milk alternative even it meets federal WIC requirements for criteria for plant-based milk?

Answer: Yes, authorizing plant-based milk alternatives as a substitute for milk is a State agency option, therefore State agencies determine if they will authorize such products. Each WIC State agency is encouraged to offer as much variety and choice as possible within their budget and cost containment measures to accommodate their participants' nutritional needs.

Fish:

1. **Question:** Is sugar an approved ingredient [for canned fish]?

Answer: The minimum nutrient requirements and specifications for canned fish do not prohibit added sugar as an ingredient to canned fish (see Table 4 of 7 CFR 246.10(e)(12) for the full list of federal minimum requirements). To provide participants with variety, regulations allow State agencies to authorize canned fish products with added sauces and flavorings, which may contain added sugars.

State agencies have administrative flexibility (see 7 CFR 246.10(b)(1)(i)) to establish criteria in addition to the minimum Federal requirements, which could include prohibiting or placing a limit on added sugar in canned fish with sauces and flavorings.

Other:

1. **Question:** State agencies are seeking guidance on approving foods with artificial and “natural” sweeteners (stevia, aspartame, monk fruit, etc.), specifically yogurts and other foods as applicable.

Answer: While restricting or allowing foods with non-nutritive sweeteners (stevia, aspartame, monk fruit, etc.) continues to be a State agency option, State agencies are encouraged to support WIC participants in making healthy choices by authorizing nutrient dense foods. In addition, and in accordance with the *Dietary Guidelines*, low- and no-calorie sweeteners are not recommended for children younger than the age of two.

State agencies have administrative flexibility (see 7 CFR 246.10(b)(1)(i)) to establish criteria in addition to the minimum Federal requirements, which could include prohibiting or placing a limit on foods containing artificial sweeteners.