2021

FOOD AUDIT TOOLKIT

ELEVATING VOICES OF LEADERS VYING FOR EQUITY

EVOLVE
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Introduction

Food accessibility is one of the many reasons that Black Americans exhibit some of the most adverse health outcomes, especially compared to their white counterparts. Despite the unacceptable and incorrect narrative that health inequities are the result of Black Americans’ poor diets, the true issue is that the food environment in predominantly Black communities is not designed with the wellbeing of its residents in mind.

As Fannie Lou Hamer best put it, "All my life I have been sick and tired. Now I’m sick and tired of being sick and tired."

It is time we shift this narrative, and design the food environments we want to see in our communities.

The Food Audit Toolkit has been created to redesign food availability in our neighborhoods. This resource has several sections:

01 Setting the Stage & How We Got Here
How we got to where we are today with the disproportionate share of inequitable food environments.

02 The Reality of the Food Environment
Before we can move the needle on our food environment, we need to understand what is currently happening in our communities. It is important to note that the Audit Tool is designed for use on small retail stores, as Black communities tend to have more of those types of establishments than traditional grocery stores. As food safety is also part of this matter, we will provide a rundown on what is and is not safe in food establishments.

03 Moving Beyond the Audit
After completion of the audits is the development of solutions to transform food environments, which will have an impact on the regional food system.

We hope that you find this toolkit useful, and most importantly, utilize it to spark the much needed changes that our communities deserve.
PART 1: Setting the Stage

How we got here

“According to the USDA, a “food desert” just means a zip code with high poverty and no nearby grocery stores. “Food apartheid” is a term that Karen Washington introduced me to and refers I think more accurately to the situation. A desert is natural, but there's nothing natural about your zip code being the number-one determinant of your life expectancy, usually highly correlated to race. And that's all about, like I said, histories of redlining and zoning exclusions of people of color from certain neighborhoods. The fact that certain people have food opulence and others have food scarcity is not because of personal choice. It's because of these systems of segregation that are more appropriately called apartheid. So that's a term that we use to not pretend that it's natural and inevitable when one in four Black children are hungry every night.”

- Leah Penniman, Soul Fire Farm

MIDDLE OF THE MAP

St. Louis’s geographic location as the center of the continental United States has landed St. Louis as a consistent economic center in the country. Railroad expansion allowed cross-continental transit with St. Louis a main passing-through location. As a result, many industries grew within our city. Because of the various industries supported by its unique location, St. Louis became the 4th largest city in the country in the 1890’s.1
PART 1: Setting the Stage

BLACK ST. LOUIS, 1910 - 1950
As the City of St. Louis continued to grow as an economic force and in population size, the Black population followed suit. The Great Migration saw a huge movement of African Americans moving from the South to other cities, seeking out economic opportunities. From 1910-1920 the city’s Black population increased over 50% to around 65,000, making it the 8th largest African American population in the country. While the population of Black St. Louisans increased, the geographical boundaries remained the same.

From 1910 - 1920, St. Louis's Black population increased over 50% to around 65,000.

"On Feb. 29, 1916, the City of STL became the first in the nation to pass a residential segregation ordinance by referendum. It stipulated that no Black should move into neighborhoods where either 100% of the houses were owned by whites or 75% of the residents were white. The ordinance also banned whites from moving to neighborhoods in which the opposite set of circumstances prevailed."

Although this ordinance did not stand up in the courts, another tool sprang up that proved to be effective in maintaining segregation in the City: restrictive covenants. **Restrictive covenants** are agreements that forbid the purchase, lease, or occupation of a piece of property by a certain group of individuals, who more often than not were African Americans. Real estate groups and neighborhood associations collaborated to enforce these agreements. These covenants restricted Black St. Louisans to where they could live, the boundaries being Grand Boulevard: west of Grand was where whites lived, and east of Grand was where Blacks lived.

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PART 1: Setting the Stage

In addition to the restrictive covenants being enforced at the local level, federal efforts also perpetuated housing segregation. The Federal Housing Administration, formed in the 1930’s, refused to insure mortgages in or near Black neighborhoods.

“The Federal Housing Administration’s justification was that if African-Americans bought homes in these suburbs, or even if they bought homes near these suburbs, the property values of the homes they were insuring, the white homes they were insuring, would decline. And therefore, their loans would be at risk. There was no basis for this claim on the part of the Federal Housing Administration.”

Redlining developed from this, as color-coded maps were created for cities throughout the country. These maps showed where it was “safe” to insure mortgages. Places where Blacks lived were colored red to “indicate to appraisers that these neighborhoods were too risky to insure mortgages.”

These maps showed where it was “safe” to insure mortgages. Places where Blacks lived were colored red to “indicate to appraisers that these neighborhoods were too risky to insure mortgages”.

These practices created a housing shortage as Black St. Louis consistently grew between 1910 and 1950. In the 1950’s, the City of St. Louis saw its peak population with over 850,000 residents. The City experienced consistent population loss in decades following the 1950’s, as residents began trickling to St. Louis County.
PART 1: Setting the Stage

WHITE FLIGHT
“The decade after 1950 was the first in which the population of the City of St. Louis fell, and it has continued to decline in every subsequent decade. Much of the city’s population loss was attributable to a one-to-one gain in the white population of the county. In 1940, the population of almost entirely white St. Louis County was about 250,000; by 1960, it was over 700,000. Whites were moving out of the city.”

Population increase in St. Louis County
The population of St. Louis County almost tripled between 1940 and 1960.

"Whites were moving out of the city and into the suburbs."

This surge of population in St. Louis County by whites was due to the availability of affordable homeownership financing. In addition, the FHA and other real estate entities created fear of declining property values when living near Black St. Louisans.

As whites fled the City of St. Louis, the economy left with it as well:

“...companies like Emerson Electric, which had once been headquartered downtown, moved out to the suburbs along with their engineers and the bulk of their employees. And because of the hard boundary established between the City and county in 1876, there was no way for the City to follow them by expanding its limits to capture their taxes.”
PART 1: Setting the Stage

BLACK ST. LOUISANS ATTACKED BY DESIGN

As tax revenues declined with the population loss, the Planning Department leveraged various tools that would shape the racially segregated city that we are familiar with today. Harland Bartholomew, considered the father of urban planning, developed the 1947 Comprehensive Plan for the City of St. Louis. His plan is credited for providing “a beginner’s guide to building a racist city - incising and intensifying existing differences of race and class in the physical form of the built environment.”

The tools included the following:

**Highway routes**

Highways were routed through Black neighborhoods such as Carr Square, Hyde Park, and Mill Creek Valley. In addition, “I-70 was built directly through the historically Black Washington Cemetery, requiring the disinterment of thousands whose graves were relocated to cemeteries all over the metropolitan area, in a process so haphazard that the locations of many remain a mystery today.”

**Zoning**

Zoning, which determines land use that can and cannot be permitted in jurisdictions, has been used historically throughout the St. Louis region to reinforce residential segregation. “Zoning was introduced in the early twentieth century to protect public health and safety by separating incompatible land uses, like heavy industrial and residential.” Through zoning, single-family houses were built in different areas from apartment buildings and were separated from where industrial development occurred. Without explicitly mentioning race, zoning for single family houses was coded language for white residents, whereas zoning where apartment buildings and industrial development occurred was coded language for Black residents.

**Redevelopment**

No one has put it as best as activist Ivory Perry: “Black removal by white approval.” Once land is considered “blighted”, developers are incentivized to build on the land through what are called tax abatements. This building up on the land is often referred to as redevelopment. More often than not, this redevelopment results in the demolition of all buildings, including homes. Residents are displaced and forced to live elsewhere. Mass redevelopment has occurred at the expense of Black communities, including Mill Creek Valley. This neighborhood, at one point home to 20,000 residents, was in the heart of the Central corridor of St. Louis. What came from this major redevelopment at the expense of the Black residents forced to relocate? An extension of St. Louis University’s campus, Interstate 64, and even part of Harris Stowe-State University.
PART 1: Setting the Stage

Media

The media was also used to stoke fear among whites regarding Black residential St. Louis. One example of this was an article published in the St. Louis Post Dispatch titled, “Cancerous Slum District Eating Away at Heart of City.” This news article is just one instance of many others that painted a false narrative of Black residents and their living conditions, leaving out the racist practices resulting in less than ideal living conditions. Instead, it blamed residents for their circumstances and reinforcing the “need” for redevelopment to ensure a thriving St. Louis City.

![Map of “Cancerous Slum District Eating Away at Heart of City”](https://www.newspapers.com/clip/7640579/map-of-cancerous-slum-district-eating/)

PASSAGE OF HISTORIC LEGISLATION SUPPORTING BLACK ST. LOUISANS

The 1960’s saw the passage of federal legislation that provided protections against the discrimination that had been experienced by African Americans:

1. **Civil Rights Act** (1964): “The Act outlawed discrimination on the basis of race, color, religion, sex, or national origin, required equal access to public places and employment, and enforced desegregation of schools and the right to vote.”

2. **Fair Housing Act** (1968): “The Fair Housing Act prohibited discrimination concerning the sale, rental and financing of housing based on race, religion, national origin or sex.”

The passage of these pieces of legislation greatly increased access and opportunities for Black St. Louisans, including choices where they could live. The 1970’s saw an increase in African Americans moving to St. Louis County.
PART 1: Setting the Stage

A FINAL BLOW TO NORTH ST. LOUIS CITY: THE TEAM FOUR PLAN

Throughout the 1960's and 1970's, the population of the City of St. Louis continued decreasing, with revenue shrinking as well. The Rand Report, published in 1973, provided its opinion of the future of the City:

“As things stand, the most likely prognosis is continued decline. The City of St. Louis might assume a new role as a large suburb among many suburbs.”

This report created an uproar among the Board of Aldermen. This resulted in the demolition of thousands of buildings on the North Side, but preserved thousands of buildings on the South Side. These events spurred the creation and publication of the Team Four Plan in 1975.

The plan laid out an implementation strategy to improve its circumstances using limited resources. This strategy divided the City in three priority areas:

- **Conservation areas**: Neighborhoods that were already successful and thriving.
- **Redevelopment areas**: Neighborhoods that had potential to improve with some investment.
- **Depletion areas**: “Areas of spotty City services and redlining - where large numbers of the unemployed, elderly, and recipients of welfare are left to wait for assistance which does not seem to be forthcoming.” The recommendation was for the City to “adjust services and public investments so as to provide for those who are remaining in these areas. Yet these efforts should be pursued without encouraging new investment until the City determines that Redevelopment can and should begin.”

In other words, “The plan basically advises the city to provide just enough for those left behind, but no more than that.” This idea is often referred to as **benign neglect**. The Team Four Plan created an outcry among Alderpersons representing North St. Louis City, as well as their Black constituents. Although never officially adopted by the City of St. Louis, it appears that the practice of benign neglect and disinvestment in North City has been perfectly implemented.
PART 1: Setting the Stage

DEJA VU IN ST. LOUIS COUNTY
The population of St. Louis County steadily increased throughout the 1940’s and 1950’s. Zoning was used as a tool to ensure only single-family residences with large lots were allowed. After moving to St. Louis County, residents would organize a neighborhood association, and incorporate themselves as a city for the purpose of zoning their neighborhood and the surrounding area.

“Of the 92 municipalities in St. Louis County today, over half were established during the single-family suburban land rush between 1943 and 1954. Along with large lots, the exclusion of multi-unit dwelling was a principal tool of population regulation. None of these zoning codes were explicitly racial. And only occasionally did their underlying purpose spill into the public record.”

As previously mentioned, the passage of the Civil Rights and Fair Housing Acts resulted in the growth of Black St. Louis County residents in the 1970’s. The growth of African Americans in North County led white St. Louis County residents to move out of North County and migrate further west:

“According to Census data, by 2000, once nearly all white municipalities bordering North St. Louis had become more than 75 percent black, with the majority at 90 percent or more.” These once all-white municipalities that saw this major shift in demographics included cities such as Wellston, Normandy, Jennings, Ferguson, and Bellefontaine Neighbors.13

The Recession of 2007 added another blow to North County, as Black homeowners were more impacted than their white counterparts due to being targeted by predatory tactics from the
PART 1: Setting the Stage

mortgage industry. Unfortunately, “The situation continued to drive down housing prices and incentivized more middle-class residents to move.”\(^\text{13}\)

One example of such incentivizing occurred through the federal and state levels: “More than $500 million more in land acquisition and other costs was spent to complete the Page Avenue extension into St. Charles County in 2014. The 20-mile stretch of divided highway, also known as Highway 364, was built to alleviate traffic congestion as St. Charles County grew in population.”\(^\text{13}\)

In addition, North County saw businesses and large employers leave. One of the largest losses was the Ford plant in Hazelwood. The closing of the facility, the size estimated to be the equivalent of 55 football fields, produced significant layoffs. Aside from providing employment, “The plant contributed $3.2 million in tax revenue, or 15% of Hazelwood’s budget in 2001.”\(^\text{14}\)

As a result: “North St. Louis County’s history of suburban zoning coupled with the lack of significant infrastructure now causes distinct problems for poorer African Americans left behind in segregated suburban cities that have experienced rapid disinvestment.”\(^\text{13}\)

“Smaller ranch homes in fragmented municipalities separated from retail and other services declined in value and condition and became unplanned low-income housing as middle-class whites and middle-class African Americans left. Retail and other jobs followed. North St. Louis County residents often find themselves in isolated neighborhoods with less access to social services and support agencies, poor transportation options, and declining schools and tax bases.”\(^\text{13}\)

“Many African American residents in highly segregated suburban areas also struggle with inequitable tax rates and services. Typically, their cities lack business and retail tax revenue, and are forced to tax lower-valued real estate more intensively to cover services.”\(^\text{13}\)
PART 1: Setting the Stage

WHAT’S THIS GOT TO DO WITH FOOD ACCESS?
The context provided shows a clear pattern of historical disinvestment in North St. Louis City and County, which is where the highest concentrations of Black St. Louians reside. This disinvestment is connected to poverty, crime, and food accessibility. These challenges disproportionately impact predominantly African American communities in St. Louis City and County.

As they say, a picture is worth one thousand words. Using data from 2015, the map to the left tells us the percentage of the population that is identified as low income and has low access (LILA) to supermarkets – low-income persons that live more than ½ mile from a supermarket. This metric is used by the United States Department of Agriculture (USDA) when looking at food access.14


Sadly, Black St. Louians, highly concentrated in North St. Louis City and County, are bearing the brunt of adverse health and wellbeing because of this historic disinvestment. As you can see on the map to the right, the Census tracts with high percentages of Black populations are concentrated in North St. Louis, just like the high percentage of people who are low income with low access to supermarkets.

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BRINGING IT ALL TOGETHER
To illustrate how the aforementioned history has impacted the availability of food establishments in Black St. Louis, the story of the Ville, provided by Alayna Sibert Patrick, is provided below.

A History of Food Provision in the Ville
The Ville neighborhood exists between St. Louis Avenue, Martin Luther King Jr. Drive, Sarah Street and Taylor Avenue. The neighborhood is well known for some of its past and present historical landmarks including Annie Malone’s Poro College, Sumner High School, (The first high school for African Americans west of the Mississippi River), and Homer G. Phillips Hospital.

A BRIEF HISTORY OF THE VILLE
The Ville was originally named Elleardsville, after Charles Elleard. He was a horticulturalist, and his estate was bounded by the streets that we know today as Martin Luther King Drive, Annie Malone Drive, Cote Brilliante Avenue, and Newstead Avenue. His land was annexed to the City of St. Louis in 1876. During this time, much of the area was inhabited by German and Irish residents and few African Americans. Most of the development of the area began in the 1890's and this was one of the few areas that African Americans were allowed to live in during that time. As more African Americans began moving to this area due to affordability and better jobs, white residents began to move to other parts of the city and form restrictive covenants. By 1930, 90% of the Ville’s residents were Black and black businesses were thriving in the neighborhood. Due to the success of this community, the Ville became known as the cradle of Black culture.

Fig. 8. Alayna Sibert Patrick, June 2017.
**PART 1: Setting the Stage**

**THE VILLE’S HISTORY OF FOOD BUSINESSES**

As mentioned previously, the Ville became known as the cradle of Black culture, with thriving Black businesses. As it relates to this Toolkit, information will be provided about the food-related businesses. St. Louis directories were used to find this information. The directories classified the businesses as one of the following types of establishments: grocers; butcher shops; confectioneries; delicatessens; and bakeries.

**IMPORTANT THINGS TO NOTE:** Over the years, businesses were listed under different food-related categories in the city directories. For example, a business may be listed under the butcher shop section one year, and the grocery store section the next year. It is also important to note that grocers could have been an individual person that sells food or an actual grocery store. There may have been other directories that existed unbeknownst to the researcher at the time, and some businesses may not have been listed in the directories at all.

**Food Provision Peaks During Great Migration and Declines in the 1950s**

![Graph showing the number of food-related businesses from 1878 to 2017](image)
PART 1: Setting the Stage

SUMMARY
When we look at the change in the available food provision in the Ville neighborhood, we notice that the decline initially began in the 1940's and 1950's. This is a time period when the Shelley versus Kraemer Supreme Court decision ruled that restricted covenants based on race could not be legally enforced. Since African Americans had more freedom to live in other parts of the city, they probably began to move out of the Ville, resulting in the closure of businesses. This is also a time period where we see the emergence of larger chain grocery stores and supermarkets. The rise of these stores may have had an influence on some residents no longer shopping within their communities. The major decline in businesses happened from 1963-1970 and by 1980, we saw an increase in restaurants, but a decrease in grocers, and delis. By 1990, we see even more of a decline and years 2000 through 2015 really displays the loss in food-related businesses.

The Ville has no grocery stores at this time. However, there are corner stores located in the nearby Greater Ville and Vandeventer neighborhoods. Some restaurants that currently reside in the Ville are Jaden's Diner, Brother's Diner, and the Golden Coin House Chop Suey. There are also a few community gardens within the Ville neighborhood as well.

Many of the businesses that once existed are now abandoned buildings or vacant lots owned by the City of St. Louis. According to the St. Louis City Land Reutilization Authority (LRA) department website, there are currently 521 properties located in the Ville that are city owned. This is a decrease in city owned properties since the 575 (2018) and 583 (2017) properties listed in previous years.
PART 2: The Reality of the Food Environment

Purpose of the Audits

The St. Louis Food Policy Coalition (STLFPC), a group of non-profit organizations, governmental agencies, and passionate individuals working together to address the food system needs of the Greater St. Louis area, developed this audit tool to measure food access in the St. Louis region. Measurement is important because it provides a starting point and allows us to determine the progress we are making in regard to food access beyond grocery stores. It also helps us identify the regions of most opportunity, prioritize efforts in those locations, and evaluate which projects are working. We developed this tool to evaluate whether a store meets the Supplemental Nutrition Assistance Program (SNAP) stocking requirements and the cost of these staple foods. For more information about the SNAP as well as the Supplemental Nutrition for Program for Women, Infants, and Children (WIC) programs, please refer to pages 32 and 33.

Audit Preparation

**Role 1: Observer**

Identify items as the pair of auditors move throughout the store. For example, as the auditors walk through the fruit and vegetable section, the observer counts how many fruits are available.

**Tools**

Make sure you have everything needed to perform the audits:
- Print-out of Audit Tool
- Pen and hard surface to record data
- Address of store before you depart
- Confirm at least 2 participants at each store
- Participants designated as observers or recorders

**Role 2: Recorder**

Record the information identified by the observer. The team of auditors should walk through the store in a systematic manner (walk each section of the store) and stay together at all times.

**Store Owners**

Ask for the store owner or manager (if owner is not present) when you enter the store. Let the store owner or manager know that you are collecting data from stores in the area to provide a profile of food availability and costs in the community. Tell them the information will only be used for this purpose. Before you leave, thank them for allowing you to spend time in their store for this purpose.
For a store to accept SNAP benefits they must meet specific stocking requirements. The stocking requirements include:

- **4 Staple Food Categories**
  - (1) vegetables or fruits
  - (2) meat, poultry, or fish
  - (3) dairy products
  - (4) breads or cereals

- **3 varieties within each Staple Food Category.**
  Eg. within "vegetables and fruit", they might sell apples, oranges, and carrots.

- **3 Stocking Units per variety**
  Stocking units are a can, bunch, box, bag, or package that a product is usually sold in.

- **1 perishable Staple Food Variety in at least 2 Staple Food Categories**
  Eg. apples (vegetables & fruit) and milk (dairy products)
PART 2: The Reality of the Food Environment

Audit Tool General Directions

01 Count the number of items that fall within each category.
Then, complete the audit tool by identifying if specific items are available, the price per unit of the least expensive item for each food listed, and whether the store has 3 stocking units of each item.

02 Be sure to record price per unit.
We have identified the units of measure that will most likely be used. If the unit of measure is different than what is included in the audit tool please note what unit was used instead.

03 Multiple ingredient foods count as staple foods in the category of their main ingredient.
If a food has ingredients from more than one staple food category, go with the dominant one. E.g. cream of mushroom soup would be considered a staple food in the vegetables or fruits category with main ingredient of "mushrooms".
PART 2: The Reality of the Food Environment

Definitions of Audit Components

**Canned** - Items that are packaged in aluminum cans, plastic containers, pouches, or other packaging that are preserved, not fresh, are considered canned.

**Chicken** - There are several chicken cuts that may be available. If there is a choice, we want to price *chicken breasts first, then thigh and wing*. For any of the cuts please include the least expensive cut and indicate which chicken cut you priced.

**Stocking unit** - For each item sold, there should be 3 **stocking units**. For example, if the store has canned green beans, there should be three cans of green beans in stock. If the store has only 3 cans available on the shelf, you would mark “no” in the 3 stocking units.

**Type** - The number of different types of each time. For example, if the store has fresh apples, bananas, and oranges you would indicate 3 for the number of types of fruit. If the store has 2 varieties of apples, you would count apples as 1 even though there is more than one variety.

**Type priced** - For the items such as noodles and rice which may have more than one option, please price the least expensive option available and include the name of the item priced. For example, spaghetti noodles or macaroni noodles.

**Unit price** - In some instances, we realize that more than one unit is likely. For example, we included $______ per lb OR $_______ per item for fresh fruit recognizing that fruit is often sold by the piece.

**PLEASE NOTE:** We anticipate that there will be challenges completing the audit tool. Please provide notes where you have uncertainties about the information you provided. This will help us refine the tool for better data collection in the future.
PART 2: The Reality of the Food Environment

Ensuring Food Safety in Our Communities

The FDA Food Code is over 700 pages long. Here are some highlights.

Food safety is often an issue in our food environments. With that in mind, the Toolkit wanted to be sure to equip communities with what is allowed and prohibited in places that provide food to the public. The Food Code represents FDA’s “best advice” of practices that ensure the safety of the public at food retail establishments.

The purpose of the FDA Food Code is to keep food safe for all citizens. It is also a guidance tool for regulators in local health departments. The Food Code is updated every four years with the most recent and proven information that ensures the safety of food served to the public. Local health departments have the authority to choose what parts of the FDA’s Food Code to follow. They also can add additional items to their municipality’s food code. For instance, in the City of St. Louis, Food Code also includes the requirement for Hepatitis A Vaccination for all food workers; this is not a requirement of the US FDA Food Code.

Because food safety is so important, and the most recent FDA Food Code is over 700 pages long, the Toolkit is highlighting several items for communities to be aware of when obtaining food from an establishment.

**Permit**
All facilities must obtain a Retail Food Service Permit to Sell - Serve or Give Away Food to the Public (Except for the COVID-19 special program for Unhoused People).

**Home Preparation**
Food prepared in a person’s home or facility that does not have a City issued Health Permit or is under inspection is prohibited. Under the state’s Cottage Food Law, individuals can only sell baked goods, jams, jellies, and dry herbs products directly to consumers, which includes sales from home and at events.

**Approved Source**
All foods must come from an approved source - a food wholesaler, retailer, restaurant, grocery store, bakery, etc. No foods captured in the wild are approved for public sale / service - ex. deer / rabbits - that have not been USDA inspected and approved.

**Temperature in Transit**
For foods that must be kept cold or hot - At ALL times during storage, transport, and service - these foods must be kept COLD - at or below 41 Degrees F; HOT - at or above 135 Degrees F.
PART 2: The Reality of the Food Environment

**Temperature at facility**
Facilities must provide adequate refrigeration / heating to hold all foods at the proper temperature. ALL equipment must have a working thermometer to monitor food temps. This includes steam tables, all refrigerators and freezers. Crock pots are not allowed to heat food.

**Sanitization**
All food facilities must have a three compartment sink to Wash / Rinse / Sanitize. Facilities must properly sanitize all wares before allowing them to air dry. Facilities must have chemical sanitizer ex. Bleach on hand and a test kit to check sanitizer concentration.

**Hand Washing**
All food facilities must have a separate Hand Washing Sink that is always properly supplied with hot water, soap, and disposable paper towels.

**Disposables**
All disposable containers and utensils may only be used once.

**Storage**
All food, and food service items, must always be protected - stored a minimum of 6" above the floor, covered, in a safe location - Not below any source of contamination - ex. plumbing lines, unfinished basements, stairs.

**Pets**
Pets are not permitted in food prep areas or food facilities ( service pets may be allowed in the eating area under proper control).

**Attire**
Food staff must wear sufficient clothing and hair coverings.

**Serving**
Facility must use gloves, tongs, or other utensils to prevent bare hand contact with all foods that are ready to eat - ex. fruit, sandwiches, salad.

**Pests**
All food facilities are required to maintain the premise without pests - mice, roaches, gnats, etc.

**Smoking**
Smoking is prohibited in food facilities. Employees are not allowed to eat in areas where food is prepared.

**Vaccinations**
All paid and non-paid food handlers must have proof of vaccination for Hepatitis A - on file at the food facility.

**Cleanliness**
All food facilities are required to maintain the premise clean and in good repair - no accumulations of trash, dust, debris, or items not required in daily operations.
PART 2: The Reality of the Food Environment

Trained Manager
Most importantly - All permitted Food Establishments are required to have, on duty, working - At ALL Times - at least one Person-In-Charge, with a certificate in food safety management. Ex. Serv Safe Manager Level. This certified person must be on-site during ALL business operations and Food Handling. This person is trained in food safety and is to ensure other facility employees follow proper procedures.

Facilities
Food facilities must have proper lighting with shields over lights. Floors, walls, and ceilings in good repair that are easy to clean. Food facilities must also have a separate sink for mop water; it may not be disposed of in the kitchen sink.

Expiration Dates
The FDA Food Code does NOT prohibit the sale of foods past their ' Best By ' or ' Use By ' date. Only Infant formulas and baby foods MAY NOT be sold past their expiration date. Consumers make the choice to purchase or not. The retailer may not hide, remove, or cover the expiration date - for example with the price sticker. That would be an FDA Food Code Violation.

If you feel an establishment is in violation of the Food Code, it should be reported. Before you report it, make sure you know the date and time of when you were in the establishment, as well as its address.

Reporting Food Code Violations in St. Louis City:
  • Contact the Citizens Service Bureau about the concern. You can give them a call at 314-622-4800 or report the issue online.
  • The violation will then be assigned for investigation, and you can check on the status of what you submitted.

Reporting Food Code Violations in St. Louis County:
  • Contact the St. Louis County Department of Public Health’s Environmental Division at 314-615-8900 or report the issue online.
# Small Retail Food Audit Tool

**Date:**

**Time of day conducted:**

**Store address:**

**Auditors:**

**Store name:**

**Store zip code:**

## Store Type (Check All That Apply)
- Grocery Store
- Convenience store
- Pharmacy
- Dollar store
- Gas station
- Other:

## Accepts WIC?
- Yes
- No

## Accepts SNAP?
- Yes
- No

## Are the Prices for Each Item...
- Marked clearly with a bar code?
- Marked clearly without a bar code?
- Not marked and must be determined at the register?
- Other (please describe):

## Which Best Describes the Layout of the Store?
- Items displayed on shelves throughout the store
- Items displayed behind glass at the cash register
- Other (please describe):

## ON a Scale of 1 to 5 Please Rate How Clean You Feel the Stores is With 1 Being Very Unclean and 5 Being Very Clean.

<table>
<thead>
<tr>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
</tr>
</thead>
</table>

## Are Nicotine Products Sold?
- Yes
- No

## Are Any Items Expired?
- Yes
- No

If yes, please estimate how many different types of items are expired: ____________

## Is Alcohol Sold?
- Yes
- No
# Small Retail Food Audit Tool

## Staple Food Category 1: Fruits & Vegetables

### FRUITS

<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>FOOD TYPE</th>
<th>AVAILABLE?</th>
<th>PRICE (WITH UNIT)</th>
<th>3 STOCKING UNITS?</th>
<th>PRICE CLEARLY MARKED WITH BARCODE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canned</td>
<td>Applesauce</td>
<td>Yes No</td>
<td>$___ per __ oz can</td>
<td>Yes No</td>
<td>Yes No</td>
</tr>
<tr>
<td></td>
<td>Peaches</td>
<td>Yes No</td>
<td>$___ per __ oz can</td>
<td>Yes No</td>
<td>Yes No</td>
</tr>
<tr>
<td>Fresh</td>
<td>Apples</td>
<td>Yes No</td>
<td>$___ per __ lb OR piece</td>
<td>Yes No</td>
<td>Yes No</td>
</tr>
<tr>
<td></td>
<td>Bananas</td>
<td>Yes No</td>
<td>$___ per __ lb OR piece</td>
<td>Yes No</td>
<td>Yes No</td>
</tr>
<tr>
<td>Other</td>
<td></td>
<td>Yes No</td>
<td>$___ per ___(include unit)</td>
<td>Yes No</td>
<td>Yes No</td>
</tr>
</tbody>
</table>

### NOTES:

### VEGETABLES

<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>FOOD TYPE</th>
<th>AVAILABLE?</th>
<th>PRICE (WITH UNIT)</th>
<th>3 STOCKING UNITS?</th>
<th>PRICE CLEARLY MARKED WITH BARCODE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canned</td>
<td>Green beans</td>
<td>Yes No</td>
<td>$___ per __ oz can</td>
<td>Yes No</td>
<td>Yes No</td>
</tr>
<tr>
<td></td>
<td>Corn</td>
<td>Yes No</td>
<td>$___ per __ oz can</td>
<td>Yes No</td>
<td>Yes No</td>
</tr>
<tr>
<td>Fresh</td>
<td>Onions</td>
<td>Yes No</td>
<td>$___ per __ lb OR piece</td>
<td>Yes No</td>
<td>Yes No</td>
</tr>
<tr>
<td></td>
<td>Potatoes</td>
<td>Yes No</td>
<td>$___ per __ lb OR piece</td>
<td>Yes No</td>
<td>Yes No</td>
</tr>
<tr>
<td>Frozen</td>
<td>Green peas</td>
<td>Yes No</td>
<td>$___per __ oz bag</td>
<td>Yes No</td>
<td>Yes No</td>
</tr>
<tr>
<td>Other</td>
<td></td>
<td>Yes No</td>
<td>$___ per ___(include unit)</td>
<td>Yes No</td>
<td>Yes No</td>
</tr>
</tbody>
</table>

### NOTES:
# Small Retail Food Audit Tool

## Staple Food Category 2: Grains / Cereals

Type(s) of grains/cereals: ___(#)

<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>FOOD TYPE</th>
<th>AVAILABLE?</th>
<th>PRICE (WITH UNIT)</th>
<th>3 STOCKING UNITS?</th>
<th>PRICE CLEARLY MARKED WITH BARCODE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bread</td>
<td>Bread, white</td>
<td>Yes □ No □</td>
<td>$__ per __ oz loaf</td>
<td>Yes □ No □</td>
<td>Yes □ No □</td>
</tr>
<tr>
<td></td>
<td>Bread, 100% whole wheat</td>
<td>Yes □ No □</td>
<td>$__ per __ oz loaf</td>
<td>Yes □ No □</td>
<td>Yes □ No □</td>
</tr>
<tr>
<td>Other</td>
<td>__________</td>
<td>Yes □ No □</td>
<td>$__ per ___(include unit)</td>
<td>Yes □ No □</td>
<td>Yes □ No □</td>
</tr>
</tbody>
</table>

**NOTES:**

<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>FOOD TYPE</th>
<th>AVAILABLE?</th>
<th>PRICE (WITH UNIT)</th>
<th>3 STOCKING UNITS?</th>
<th>PRICE CLEARLY MARKED WITH BARCODE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cereal</td>
<td>Toasted oats or cheerios</td>
<td>Yes □ No □</td>
<td>$__ per __ oz box/bag</td>
<td>Yes □ No □</td>
<td>Yes □ No □</td>
</tr>
<tr>
<td>Other</td>
<td>__________</td>
<td>Yes □ No □</td>
<td>$__ per ___(include unit)</td>
<td>Yes □ No □</td>
<td>Yes □ No □</td>
</tr>
</tbody>
</table>

**NOTES:**

<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>FOOD TYPE</th>
<th>AVAILABLE?</th>
<th>PRICE (WITH UNIT)</th>
<th>3 STOCKING UNITS?</th>
<th>PRICE CLEARLY MARKED WITH BARCODE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Noodles</td>
<td>Dry pasta, not ramen</td>
<td>Yes □ No □</td>
<td>$__ per __ oz box/bag</td>
<td>Yes □ No □</td>
<td>Yes □ No □</td>
</tr>
<tr>
<td></td>
<td>100% whole wheat available?</td>
<td>Yes □ No □</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rice</td>
<td>White</td>
<td>Yes □ No □</td>
<td>$__ per __ oz</td>
<td>Yes □ No □</td>
<td>Yes □ No □</td>
</tr>
<tr>
<td></td>
<td>Brown rice available?</td>
<td>Yes □ No □</td>
<td></td>
<td>Yes □ No □</td>
<td>Yes □ No □</td>
</tr>
<tr>
<td>Other</td>
<td>__________</td>
<td>Yes □ No □</td>
<td>$__ per ___(include unit)</td>
<td>Yes □ No □</td>
<td>Yes □ No □</td>
</tr>
</tbody>
</table>

**NOTES:**
Small Retail Food Audit Tool

Staple Food Category 3: Dairy

Type(s) of dairy products: ___(#)

<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>FOOD TYPE</th>
<th>AVAILABLE?</th>
<th>PRICE (WITH UNIT)</th>
<th>3 STOCKING UNITS?</th>
<th>PRICE CLEARLY MARKED WITH BARCODE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Milk</td>
<td>whole or 2%</td>
<td>□ Yes □ No</td>
<td>$__ per __ oz gallon</td>
<td>□ Yes □ No</td>
<td>□ Yes □ No</td>
</tr>
<tr>
<td>Milk, low-fat</td>
<td>1% or less</td>
<td>□ Yes □ No</td>
<td>$__ per __ oz gallon</td>
<td>□ Yes □ No</td>
<td>□ Yes □ No</td>
</tr>
<tr>
<td>Cheese</td>
<td>(not cream/cottage)</td>
<td>□ Yes □ No</td>
<td>$__ per __ oz block/bag/packet</td>
<td>□ Yes □ No</td>
<td>□ Yes □ No</td>
</tr>
<tr>
<td>Yogurt</td>
<td></td>
<td>□ Yes □ No</td>
<td>$__ per __ oz tub</td>
<td>□ Yes □ No</td>
<td>□ Yes □ No</td>
</tr>
<tr>
<td>Infant formula</td>
<td></td>
<td>□ Yes □ No</td>
<td>$__ per __ oz can</td>
<td>□ Yes □ No</td>
<td>□ Yes □ No</td>
</tr>
<tr>
<td>Other</td>
<td></td>
<td>□ Yes □ No</td>
<td>$__ per __(include unit)</td>
<td>□ Yes □ No</td>
<td>□ Yes □ No</td>
</tr>
</tbody>
</table>

**NOTES:**

Store ID: _______
# Small Retail Food Audit Tool

## Staple Food Category 4: Meat, Poultry, Fish

### MEAT

- **Type(s) of fresh meat:** ___(#)  
- **Type(s) of frozen meat:** ___(#)  
- **Type(s) of canned meat:** ___(#)

<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>FOOD TYPE</th>
<th>AVAILABLE?</th>
<th>PRICE (WITH UNIT)</th>
<th>3 STOCKING UNITS?</th>
<th>PRICE CLEARLY MARKED WITH BARCODE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fresh</td>
<td>Beef, ground</td>
<td>Yes</td>
<td>$___ per ___ lb</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
<td></td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>85-90% lean</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>available?</td>
<td>No</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Type of chicken cut priced: ________________________</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chicken</td>
<td>Yes</td>
<td>No</td>
<td>$___ per ___ lb</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Eggs</td>
<td>Yes</td>
<td>No</td>
<td>$___ per ___ dozen</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Canned</td>
<td>Canned tuna</td>
<td>Yes</td>
<td>$___ per ___ lb</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
<td></td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Type of bean priced: ________________________</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Baked beans</td>
<td>Yes</td>
<td>No</td>
<td>$___ per ___ oz can</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Other beans</td>
<td>Yes</td>
<td>No</td>
<td>$___ per ___ oz can</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Other</td>
<td>________</td>
<td>Yes</td>
<td>$___ per ___(include unit)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
<td></td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

### NOTES:

### OTHER

- **Vegetable oil** (or other oil) | Yes | No | $___ per ___ oz bottle | Yes | No | Yes | No |
| **Type of oil priced:** | | | | |
| Other | ________ | Yes | No | $___ per ___(include unit) | Yes | No | Yes | No |

### NOTES:
PART 3: Moving Beyond the Audit

So, the audits have been completed. Now what?

Each community is different, and what action to take next depends on what is found while doing the audits as well as what the community wants. Next steps for action should be decided collectively, and depending on the aforementioned factors. Here are some examples of what next steps might entail for communities after they have completed audits:

Saw something concerning?

Alert staff in the store before you leave once you have completed the audit, then call the Health Department. Make sure to provide not only your concerns, but also (1) store name and address; (2) date and time audit was performed; and (3) specific observations that caused alarm.

Contact EVOLVE.

Let them know that you conducted the audit, so they can be informed as well as provide technical assistance to support your community in improving its food environment Email kellyxevolve@gmail.com.

Debrief results with your group.

What were things that you liked in the store? What were things that you would like to see improved? What were things you observed that surprised you?

Share findings with other stakeholders.

This can increase awareness and garner support among your community to drive change. This can also help to develop solutions regarding what the community wants to see. Stakeholders can include:

- **Local health department**: it's best to keep them engaged the entire process, especially if audits uncover issues in establishments.
- **Residents and leadership** at neighborhood association meetings, ward meetings, community events, etc.
- **Elected officials**. It's best to keep them informed of any issues found during the audit. In addition, they may be helpful in providing potential solutions.

Discuss results with store owner.

Engage in dialogue regarding the things folks liked, as well as the things that folks would like to see improved. Be sure to have at least one solution to give the store owner. Through dialogue, develop additional solutions and next steps.
PART 3: Moving Beyond the Audit

The Future is Food Justice

When we say food justice, what do we mean?

Dara Cooper, a leader in the national food justice movement, provides the best definition:

“A process whereby communities most impacted and exploited by our current corporate controlled, extractive agricultural system shift power to re-shape, re-define, and provide Indigenous, community-based solutions to accessing and controlling food that are humanizing, fair, healthy, accessible, racially equitable, environmentally sound and just. A framework going beyond access to ensure that our communities have not only the right, but the ability to have community control of our food including the means of production and distribution”.

Now is the time for us, as community members, to change not only our immediate food environments, but also improve the entire food system. How do we get to food justice within our communities? We design a food system that compliments the community, one that fits like a puzzle piece. This puzzle includes community-owned land; community-owned grocery stores; community-owned processing plants and restaurants; community-owned distribution by means of processes involving trucks and refrigeration that get food to our plates. Most importantly we as a collective need to create and own what food justice means for us.

This Toolkit does not provide all of the answers for communities, but it is a starting point for us to come together as a collective to re-imagine and re-design our food environments and larger food system. We cannot afford to leave this broken system to future generations, so let’s roll up our sleeves, and get to work!

"Look closely at the present you are constructing; it should look like the future you are dreaming."

- Alice Walker
How you think the food system looks

**FARM**
Food is grown (plant-based) or raised (meat, egg, dairy) on a farm

**PROCESSING PLANT**
Processed and packaged; often requires multiple steps

**RETAIL**
Sold in a grocery store, restaurant, farmer’s market, etc.

**CONSUMER**
Prepared and eaten
How the food system actually looks

**FARM**
Our food is grown thousands of miles away on land belonging to corporate agriculture operations that use chemical sprays on their crops. Animals are raised in inhumane conditions at factories that pollute the surrounding neighborhoods, predominantly low-income communities of color.

**FARM**
Support, resources, and land access are granted to predominantly white farmers, both urban and rural.

**PROCESSING PLANT**
Food is processed and packaged, often in rural non-white areas that employ Black and non-white immigrant labor in dangerous and unsanitary conditions but are typically owned by white males.

**CONSUMER**
Unhealthy options and low-quality produce is also distributed through food giveaways and food pantries, which is only a bandaid to the problem of food access.

**CONSUMER**
With limited affordable and accessible options at nearby stores, families and individuals are left with unhealthy food that can lead to a variety of health issues.

**RETAIL**
The food selection in low-income neighborhoods is smaller, poorer quality, highly processed, and lacks nutritional value. Instead of grocery stores, there is an abundance of fast food outlets, convenience stores, and liquor stores. This is a result of racist zoning laws that create food swamps and food apartheid.
How we're reimagining the food system

Consumers and workers are leading every stage of the process.

**FARM**
Black and brown farmers are supported with the resources and land to grow culturally relevant food with environmentally sustainable practices.

**RESOURCE SHARING**
Mentorship (knowledge), tool shares (assets), and youth initiatives (intergenerational wisdom).

**FOOD HUB**
True community-driven food hubs that aggregates, markets, and distributes locally and regionally grown food through just and equitable practices.

**RETAIL**
Distributed equitably to grocery stores, community-owned stores, restaurants, and schools, and available at an affordable price.

**CONSUMER**
Celebration of and community around food.
The Supplemental Nutrition Assistance Program (SNAP), formerly known as food stamps, is the largest federal nutrition program in the United States. SNAP participants receive an Electronic Benefit Transfer (EBT) which is treated like a debit card to purchase food and beverages in stores eligible to receive SNAP benefits.¹

When was it enacted?
The Food Stamp Program was piloted in 1939 to address those living in poverty during the Great Depression. Initially, it operated in half of the United States, serving 4 million Americans.² The program ended in 1943 when the US experienced a food supply shortage due to World War II and there was a sharp decline in unemployment. However, the success of the Food Stamp Program pilot was not forgotten.³ On January 31, 1964, the Food Stamp Act was made permanent and by 1971, there were over 10 million Americans receiving benefits. In 2008, legislators restructured the program to place a greater emphasis on nutrition. Through a new bill, the program was renamed the Supplemental Nutrition Assistance Program.²

Who is eligible?
Eligibility requirements for SNAP in Missouri state that the applicant:⁴
- Must be a Missouri resident
- Must be considered low-income
  - Gross monthly income (household income before taxes) must be at or below 130% of the poverty line.
  - Net income (household income after deductions) must be at or below the poverty line.
  - Assets must be valued at $2,250 or less. Households with a member who is elderly or disabled must be valued at $3,500 or less.
- Cannot have a household member convicted of a crime after August 22, 1996
- Cannot have household members in violation of probation or parole
- Must have or agree to apply for social security numbers for all household members

What is the purpose?
The Food Stamp Act aimed to strengthen the agricultural economy and to improve nutrition among low-income households.³

How does a store become eligible to accept SNAP payments?
A food retail outlet must apply to receive SNAP benefits from customers. Eligibility criteria includes:⁵
- At least 3 stocking units of 3 different varieties for staple food on a continuous basis
- SNAP benefits cannot be used to buy alcohol, tobacco, hot prepared foods, food prepared to be immediately eaten, vitamins, medicine, supplements, or non-food items such as paper products or pet food
Additional Information & Resources

Special Supplemental Nutrition Program for Women, Infants, and Children

Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) serves to safeguard the health of low-income pregnant, postpartum, and breastfeeding women, infants, and children up to age 5 who are at nutritional risk. The program not only provides nutritious foods to supplement diets, it also provides nutrition information, breastfeeding promotion and support, and health care referrals. The program is a short-term intervention program designed to influence lifetime nutrition and health behaviors in a targeted, high-risk population.

When was it enacted?
WIC was launched in 1972 to improve the health of pregnant mothers, infants, and children as there was a growing concern about malnutrition among mothers and children living in poverty. In 1975, legislation established WIC as a permanent program in the United States. Legislation passed a few years later required the program to include nutrition education and social service referral coordination. WIC introduced campaigns to increase breastfeeding rates among WIC mothers and improve public support for breastfeeding in 1997.

Who is eligible?
To be eligible, applicants must live in Missouri and either be pregnant, a woman breastfeeding an infant up to the infant’s first birthday, a woman postpartum up to six months after delivery or end of pregnancy, an infant under the age of one, or a child under the age of five.

Applicants are eligible based on low-income and nutrition risk. For low-income, applicants must have income at or below 185 percent of the poverty line, or be enrolled in TANF, SNAP, or Medicaid. For nutrition risk, applicants are screened by health professionals and the individual must have medically-based risks, such as anemia, underweight, maternal age, a history of pregnancy complications, or poor pregnancy outcomes, or have a diet-based risk such as not consuming the recommended amount of protein or iron.

What is the purpose?
WIC is a public health nutrition program under the jurisdiction of the United States Department of Agriculture. Congress determines the level of funding each year. Once approved, grants are provided to each state, and administered at the local level by county and city health centers, or private nonprofits. WIC aimed to reduce premature births, low and very low birth-weight babies, fetal and infant deaths, and the incidence of low-iron anemia; and increase access to prenatal care earlier in pregnancy, pregnant women’s consumption of key nutrients such as iron, protein, calcium, and Vitamins A and C, immunization rates, diet quality, and access to regular health care.

How does a store become eligible to accept WIC benefits?
States authorize only enough stores to provide adequate service to the population. To officially apply, applicants must visit a WIC location, which are found at multiple stores, pharmacies, and health departments around Missouri. Authorized stores must have enough variety and quantity of WIC approved products in the store. The Approved list can be found on each states’ WIC website.
References

PART 1, PART 2, & PART 3


ADDITIONAL INFORMATION & RESOURCES
References


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2020-2021 Cohort

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