



**ADAMS COUNTY**  
**HEALTH DEPARTMENT**

*Your Health. Our Mission.*

Adams County Health Department  
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WIC Administration,  
Benefits, and Certification Branch, Policy Division  
Food and Nutrition Service  
P.O. Box 2885  
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To Whom It May Concern,

Adams County Health Department is a Local Public Health Agency serving Adams County, Colorado. Serving over 522,000 residents, over 50% of Adams County residents identify as People of Color, with a large majority (41%) identifying as Hispanic and 16% born outside of the United States. Our WIC program has a monthly caseload of 9,000 participants across five clinics with 67% of WIC participants identifying as Hispanic and significant linguistic diversity among WIC participants, demonstrating the wide range of cultures served. Languages spoken by WIC participants in Adams County include Amharic, Nepali, Burmese, French, and Arabic, in addition to Spanish and English.

Given the ethnic, linguistic and cultural backgrounds within Adams County communities, we provide the following comments related to Special Supplemental Nutrition Program for Women, Infants and Children: Revisions in the Women Infants and Children Food Packages (Document ID: FNS 2022-0007-0001). We urge the USDA to expand current consideration of cultural options beyond the whole grain category, to include:

- Additional flavors and types of cheese, such as goat's milk cheese, cotija, queso fresco, etc.
- Additional types of yogurt, such as goat's milk yogurt, soy yogurt, and other plant-based options.
- Additional sizes of tofu packages, to reflect market availability and increase access for WIC families.
- Additional plant-based milk beverages, as options for clients with allergies, intolerances, and/or specific religious or cultural preferences.
- Ability to substitute more of the milk benefit for tofu, yogurt, and cheese.

We strongly support the USDA's efforts to:

- Make recent increases in the fruit and vegetable benefit permanent. Since the temporary increase started in June 2021, Colorado WIC families have been able to purchase triple the amount of produce (\$1.35 million worth!) each month. Allow the substitution of fruits and vegetables for baby foods for infants 9-11 months in age.
- Create an approval pathway for new products that are nutritionally comparable with WIC standards to provide for a variety of dietary preferences and allergies.
- Enhance the variety of healthy whole grain choices by including a broader range of culturally-preferred and gluten-free options like quinoa, teff, and blue cornmeal. Colorado WIC has already

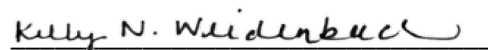
authorized whole wheat and corn tortillas, whole wheat pasta, brown rice, and oats that now represent 16% of total whole grain purchases.

- Add canned seafood options, including fish with bones, in the child and adult food packages to provide protein and calcium to families who might not consume milk.
- Expand safe and accessible options for families with limited cold storage and/or cooking facilities.
- Expand the range of package sizes across all food categories to make it easier for families to find more WIC-approved choices on grocery store shelves when products and supplies are limited or unpredictable.
- Reduce the amount of juice provided and allow the substitution of additional fruits and vegetables instead.
- Add more flexibility in the amount of formula provided to support individual breastfeeding goals.

We believe these updates – including expanded availability of culturally appropriate foods – will support enrollment in the WIC program, bolster program retention, and improve benefit redemption. In Colorado, the substantial gap between our high rate of Medicaid enrollment and low WIC enrollment (the eighth lowest in the nation) demonstrates there is room for WIC program growth, for which there is a need. One in eight residents in our county faces food insecurity. Adams County children face food insecurity in the highest rates of any age group at 17.3%. We see significant differences in access to nutrient-dense foods between communities within Adams County, with greater prevalence of food insecurity and more structural barriers to food access among communities of color. In 2022, respondents to the Adams County Community Health Assessment survey noted the importance of culturally appropriate food as a factor in addressing food insecurity. Additionally, expanding culturally appropriate WIC food options would allow our state to authorize more small, independent grocers in and around neighborhoods affected by systemic barriers to food access, often called food apartheid by our communities. WIC families could use their WIC benefits at stores in their communities that are run by and for community members, boosting nutrition and strengthening neighborhood small businesses.

We urge the USDA to move as quickly as possible to finalize this rule and ensure that all WIC families have access to updated food packages made of nutritious, culturally-relevant foods in order to increase health equity within our communities.

Sincerely,



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Sources:

Tri-County Health Department 2022 Community Health Assessment, Adams County: [https://adamscountyhealthdepartment.org/sites/default/files/2022-12/CHA\\_AdamsCo\\_2022\\_Final.pdf](https://adamscountyhealthdepartment.org/sites/default/files/2022-12/CHA_AdamsCo_2022_Final.pdf). Published May 2022.  
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