

EVALUATION OF THE FOOD DISTRIBUTION PROGRAM ON INDIAN RESERVATIONS VOLUME I: FINAL REPORT

Office of Research and Analysis

June 1990

Overview

The Food Distribution Program on Indian Reservations (FDPIR) provides supplemental foods to low-income households living on or near Indian reservations. While recognizing a need for assistance among American Indians, Congress was concerned that this need may not be adequately addressed by the Food Stamp Program, the largest and most widely available food assistance program in the United States. The primary concern was that the remote location of many reservations may make it difficult for many American Indians to participate in the Food Stamp Program because they live some distance from a food stamp office and food stores are scarce or far away. Thus, FDPIR represents an alternative to the Food Stamp Program for residents of Indian reservations.

This study presents the first nationally representative profiles of FDPIR participant and program characteristics, and the food-assistance needs and preferences among this particular target population. This executive summary provides a brief historical perspective on the program, describes the objectives and methodology of the evaluation, and summarizes the major findings.

Program Background

Household Eligibility and Benefits. To be eligible to receive a commodity package, a household must meet the income eligibility criteria established by Federal legislation, and either reside on an Indian reservation or be a tribal member who resides in the designated service area of a FDPIR program. The income limits used to determine FDPIR eligibility are the same as Food Stamp Program net monthly income limits plus the standard deduction used in determining eligibility for that program.

However, FDPIR differs from the Food Stamp Program in that the amount of food an income-eligible household receives is based solely on the number of members it contains, regardless of the specific level of income it has.

The monthly food package consists of a variety of canned and packaged commodities in such categories as meats, fruits, vegetables, dairy products, grains, and cereals. The Food and Nutrition Service (FNS) uses some surplus foods from the U.S. Department of Agriculture (USDA), but purchases most food specifically for use in FDPIR. Although supplemental in nature, the overall FDPIR food package is designed to provide adequate levels of most nutrients and food energy to participating households.

Program Administration. Since its inception in 1977, FDPIR has grown to 105 local programs serving approximately 138,000 persons each month in Fiscal Year 1989. The vast majority of programs are administered by Indian Tribal Organizations (ITOs) under direct agreements with FNS, although some operate under the supervision of an agency of State government.

FNS oversees FDPIR program operations through its network of Regional, Field, and Satellite Offices. FNS also works with other USDA agencies to procure the commodities, process the orders of local programs, and arrange shipments of food to local FDPIR programs. Staff in FNS Regional Offices assess the capability of ITOs to administer FDPIR, review annual plans of operation and budget requests

prepared by individual State agencies and ITOs, and provide technical assistance and managerial oversight to local programs.

Objectives

The specific objectives of the evaluation relate to three sets of the issues:

Program Operations:

- describe State agency or fro administration of FDPIR in terms of written policy, reported practice, and estimated costs; and
- describe program practices that are intended to maximize the efficiency and integrity of the program.

Participant Characteristics:

- describe the demographic and socioeconomic characteristics of FDPIR households; and
- identify dietary needs and preferences of low-income Indians and examine ways in which FDPIR addresses them.
- Comparison of the contributions of FDPIR and the Food Stamp Program in providing food assistance to American Indians:
- provide a preliminary comparison of the availability and acceptability Of FDPIR commodities versus food stamps for American Indians; and
- explore the unique contributions each program makes in meeting the food assistance needs of this population.

Research Design and Methods

To address the first set of objectives, we collected information about the structure and operation of FDPIR programs from a variety of sources, including staff interviews, plans of operation, statistical reports that local FDPIR programs routinely submit to FNS, and Management Evaluation (ME) reviews.

To meet the second and third set of objectives, we collected household-level data from the following sources:

- a national probability sample of 827 FDPIR case records drawn from 30 programs;
- interviews with 757 participants whose case records were selected in the sample;
- interviews with a sample of 107 American Indian households participating in the Food Stamp Program in Arizona, Montana, and Wisconsin;
- a probability sample of American Indian households whose food stamp cases were reviewed in the summer of 1986 under the Integrated Quality Control System operated by State food stamp agencies and FNS; and
- a series of focus groups with FDPIR or Food Stamp Program participants.

The sample of FDPIR households was drawn from lists of participants from 30 FDPIR programs (five large, 10 medium-sized, and 15 small programs) that were representative of all 105 local programs. The number of households studied in the evaluation was large enough to produce precise and reliable statistics for the full FDPIR sample and major subgroups such as households living in larger regions and those containing an elderly member.

Summary of Findings

The following conclusions and summary of findings is organized around the three sets of study objectives pertaining to program operations, program participants, and a comparison of how FDPIR and the Food Stamp Program meet the food assistance needs of American Indians. Larger programs appear to achieve administrative economies of scale.

Program Operations

Half of local FDPIR programs serve fewer than 250 households per month ("small programs"), and all but five of the remaining programs serve between 250 and 1,200 households per month ("medium-sized programs"). The five "large programs" serve more than 1,200 households per month. Average administrative costs per household ranged from \$614 among small programs to \$287 among large programs. Similarly, the number of participant households per full-time equivalent (FrE) staff position is nearly 100 in large programs, compared to approximately 66 in small programs.

The flat-rate administrative cost guideline established by FNS does not factor in these relative levels of efficiency. All of the programs whose administrative costs exceeded the guideline (30 percent of the value of distributed commodities) serve fewer than 250 households per month.

Local programs vary widely in the level and type of resources used to meet administrative matching-fund requirements. In regions other than the West, about half of local programs meet the 25-percent administrative funds matching requirement. FNS waives the requirement upon acceptance of justification submitted by local programs. Among small and medium-sized programs in the study sample, nearly two-thirds of the match was based on in-kind contributions, in most cases the estimated market value of warehouse and office space. In contrast, larger programs make relatively substantial cash contributions to support the operation of the program.

Program staffing is not highly specialized in FDPIR, especially in small programs. Generally, local FDPIR programs operate with a narrow range of staff functions in the areas of program administration and supervision, certification, storage and distribution, and nutrition education. In small programs, it is not uncommon for an individual to serve in all four areas. In fact, one out of five of the sample programs are two-person operations.

The highest average salary for any staff position in Fiscal Year 1989 was \$21,185 for program directors. Although staff in larger programs tend to be paid more than their counterparts in smaller programs, the generally low level of salaries for these administrative positions seems to reflect conditions that prevail in the labor markets in areas served by FDPIR. Local FDPIR programs use a variety of means to enhance the accessibility of the program for participants and potential applicants.

Most directors expressed the opinion that all potentially eligible households are aware of the availability of benefits and where to apply for them. With a few specific exceptions, most programs' outreach efforts rely on publicizing the distribution schedule each month. At the same time, many programs operate tailgate certification and distribution systems, and make home deliveries of commodities to elderly and disabled participants, to make the program more accessible.

Although program directors do not perceive any language barriers to exist for more than a small percentage of their clientele, ail programs make provision for translators to be available (either a staff member or some other person). A few programs require staff to be bilingual. The certification process in FDPIR is less demanding for both applicants and certification specialists compared to the Food Stamp Program and some other assistance programs.

Less information is required of FDPIR applicants than those in other food assistance programs, and fewer items have to be verified and documented. Also, fewer factors must be considered in calculating whether a household meets established FDPIR income limits established for FDPIR. In contrast, the Food Stamp Program involves a check on gross income, a calculation of net income that involves more possible deductions from gross income than in FDPIR, and the calculation of a precise allotment of food stamps for eligible households. Finally, most FDPIR applicants are able to obtain food the day they apply, partly because regulations permit local programs to grant a one-month certification pending verification of information.

Nutrition education activities vary widely across programs. Federal regulations do not require local FDPIR programs to offer extensive nutrition education services to program participants. Rather, programs are encouraged to coordinate with local organizations that can disseminate food and nutrition information to FDPIR households. The 30 sample programs in this study allocated an average of five percent of their administrative funds to this function, with program support ranging from zero to almost 25 percent of their annual administrative budgets. Over 25 percent of the programs reported no nutrition education budget.

About six out of ten programs reported nutrition education personnel expenditures. With few exceptions, these staff have little or no formal training in either health or nutrition. The focus of nutrition education activities tends to be distributing commodity recipes and cookbooks, and demonstrating how specific items can be prepared. Almost one-half of the programs distribute other general food and nutrition information. However, many programs are unable to maintain a supply of their nutrition education materials, thus limiting the effectiveness of their efforts.

The effectiveness of FDPIR in providing a nutritious diet to participants depends in large measure on the participants' ability to: properly select and use commodity foods; identify potential nutrition-related health problems; and make changes in their households and the community to improve health and nutrition. The development of these skills is particularly important among American Indians because they experience high rates of diet related health problems, such as diabetes, high blood pressure, and obesity than the general population.

Local programs use a combination of commodity distribution methods to meet recipient needs and local situations. In an effort to reduce participants' difficulty in obtaining commodities, about half of the programs in the study sample use the tailgate distribution method in addition to central warehouse pickup. Another third of the programs also deliver commodities to the homes of a relatively small number of elderly and disabled participants. Very few programs, primarily those serving small caseloads, rely solely on commodity distribution from a central warehouse location.

While the use of tailgate distribution systems reduces the distance participants must travel to obtain their food package, the selection of items within FDPIR food groups is somewhat reduced, and participants are able to obtain some commodity items only every two or three months. Given the tendency of smaller programs to distribute from a warehouse (or to make home deliveries to elderly and disabled participants), participants who obtain food from small programs may have a greater selection in any given month.

The availability of particular food items also may be affected by market conditions, local ordering practices, and shipping schedules to local programs. Significant variations exist across regions in terms of the availability of specific food items. Notably, in any given month, households in the West were not able to select from as wide a range of items as households in other regions. This may be related to the fact that programs in the FNS Western Region follow different ordering procedures that can cause delays in shipments. Or, it may be an unintended consequence of local programs' effort to enhance the accessibility of the program by extensively using tailgate distribution systems.

A variety of administrative controls are used to maintain program integrity. To maintain the integrity of FDPIR operations, local programs have instituted controls related to the eligibility of participants. First, consistent with program regulations, each household's reported income is routinely verified. However, recognizing the low level of income in areas served by the program, certification specialists generally accept applicants' statements of financial resources. Second, all sample programs make an effort to identify dual participation in FDPIR and the Food Stamp Program, usually through an exchange of participation lists with local food stamp offices. Third, even though a small number of households reportedly received food for which they were not eligible, more than half the sample programs have pursued claims against such households.

Inventory controls are maintained by following inventory procedures prescribed by FNS. Sometimes programs use microcomputers and software provided by FNS. While rates of inventory discrepancies are low across all programs, large programs are most effective in controlling inventory discrepancies.

Twenty-five of the 30 programs included in the study were visited in Fiscal Year 1989 by either FNS or, in the case of programs administered under the supervision of an agency of State government, by State personnel. Most programs underwent an ME review during the two years prior to this evaluation.

Profile of Program Participants

Many FDPIR households include elderly persons, and single-parent households constitute a relatively small proportion of the caseload.

More than one-third (38.9 percent) of all households include an elderly person (that is, someone aged 60 or older), and nearly one in five of the elderly live in an extended family household. The elderly account for 62 percent of the one-person households. Half of the households served by FDPIR contain children, but only one in ten is headed by a single parent with one or more children, and one-fourth are single adults living alone or together. The average FDPIR household contains 3.2 members.

- Adult FDPIR participants have completed an average of ten years of education.
- About half of FDPIR adults were working; were looking for work, or were laid off and looking for work.
- FDPIR households are poor by any conventional standard.

Income levels for FDPIR households are very low. According to their case records, nearly one in ten households, do not have any income. More than one-third of the households have gross income less than or equal to 50 percent of the poverty level established for 1989. Only one in five households have gross income that placed them above the poverty level.

About 31 percent of the participating households receive income from AFDC, Supplemental Security Income (SSI), or General Assistance through the Bureau of Indian Affairs or State welfare agencies. In sharp contrast to the Food Stamp Program, in which approximately 40 percent of the participating households receive AFDC, only five percent or so of FDPIR households receive payments from this program. This latter point reflects an important difference in the pattern of participation for American Indian households that receive this form of public assistance.

The impoverishment of FDPIR households is reflected in their level of liquid assets as well as their income. More than three fourths of the household case records indicated no cash on hand and nearly as many showed no financial assets of any kind. Among the households that had liquid assets, the average value of theft' assets was \$221.

Even though average distances to key destinations are not great, many FDPIR participants experience transportation difficulties. Although there is some regional variation in travel distances, the nearest food store is usually within four to five miles of participants' homes, whereas fresh meat and vegetables require driving to a store four to eight miles away. Commodities usually could be obtained at a site located six to nine miles from the participant's home.

More than two-thirds of participant households own a car or truck. Nearly three-fourths of the respondents either travel in their family's car to the store or to the FDPIR office, or get a ride with a friend. About one-tenth of the households have to pay a friend to drive them for shopping or for recertification.

Owning a vehicle does not necessarily eliminate transportation problems. About one out of six (one-tenth of all households in the sample) reported that they very often had difficulty getting where they needed to go because of problems with their cars or trucks. More than half of all households that owned a vehicle reported that they sometimes could not travel because they lacked money to buy gas.

Four out of ten households without vehicles (one out of eight sample households) reported that they very often had problems getting where they needed to go because transportation was not available. Nearly two-thirds said that at least sometimes they lacked money to pay someone to drive them.

Dietary Needs of Program Participants

In addition to program commodities, FDPIR households rely upon food purchases, home food production, and other USDA programs to meet their dietary needs. FDPIR households included in this study spent an average of \$31 per month per household member for food to supplement the commodities they received. About \$24 of this amount was spent at food stores, and 43 percent of the sample households reported that they only bought food at grocery stores. Households that ate at restaurants or bought take-out food generally had higher average incomes, indicating that spending at restaurants and for take-out foods did not detract from purchases at grocery stores.

About one-half of all FDPIR households produce some of their food themselves. These food production activities include growing fruits and vegetables, maintaining livestock for dairy and meat, raising poultry for eggs, and hunting and fishing. These activities varied by region.

Nearly half of the FDPIR households reported participating in other food assistance programs, mostly in other USDA programs. About 70 percent of the households with school-aged children participated in the School Lunch Program and 44 percent of these households participated in the School Breakfast Program. Nearly one in six FDPIR households received benefits under the WIC Program, representing 52 percent of the households with a child aged five or less. Over one-fourth of all households with elderly participated in one or more senior citizen assistance programs. Seven out of eight respondents report that their households had enough to eat during the survey reference month, while one out of eight say that they sometimes or often did not have enough to eat.

Almost one-half of the study population reported that they had enough to eat, but not always the kinds of food they wanted. Another nearly 40 percent responded that they had enough of the kinds of foods that they wanted. About one out of eight respondents reported that they sometimes or often did not have enough food to eat. Four out of five of these households reportedly were without food or money to buy food five or six days per month. Two-thirds of these households also skipped an average of more than four days of meals per month.

Self-reports of inadequate food supplies varied greatly by region. One-quarter of all FDPIR households in the West reported they sometimes or often did not have enough to eat, and they represented three out of five of all FDPIR households reporting this. Nearly three-fourths of the FDPIR households who reported that they had to skip meals were from the West. Most FDPIR households report adequate food preparation and storage facilities, with many of the households lacking basic facilities living in the West.

FDPIR households generally reported having adequate storage and cooking facilities. However, a significant minority lacked at least one of five basic household facilities. One-fifth of the sample reported not having hot running water in their home, 15 percent reported no indoor running water and 7.3 percent of sample reported they had no electricity. About one in ten of the FDPIR households reported having no refrigerator, while 6.3 percent reported that they did not have either an oven or cooktop stove.

The availability of basic housing facilities and food preparation and storage resources also varied by region. Three-fourths of those reporting no indoor running water lived in the West (more than one-third of all western FDPIR households did not have indoor running water). Ninety percent of the FDPIR households who reported having no refrigerator or no electricity were located in the West, representing over one-fifth of all FDPIR households located in that region. Finally, of those who reported they did not have either an oven or cooktop stove, two-thirds lived in the West.

Over half of all FDPIR households have at least one adult with one or more nutrition-related health problems, and more than one out of four households have at least one member who is supposed to be on a special diet.

Over half of all FDPIR households reported that at least one adult (a person 16 years old or older) had one or more nutrition related health problems. More than one out of four households had at least one member who was supposed to be on a special diet. Almost one-third of all households reported at least one person with diagnosed high blood pressure, about one-quarter with a member having diagnosed diabetes and over one-fifth with at least one overweight household member. For diabetes and obesity, these self-report rates fall below published estimates among American Indians.

While these same nutrition-related problems were identified by focus group participants as health issues of significant concern to their reservations, there also were misconceptions and a lack of information related to improving dietary habits. Participants expressed frustration in changing dietary practices in view of family and community preferences. They also perceived the need for more health and nutrition education. These expressed needs go beyond the scope of nutrition education services required by current Federal regulations.

Food Preferences of Program Participants

Program participants express strong positive preferences for almost all commodity food items. Within each of 15 commodity food groups (juices, fruits, vegetables, and so on), respondents indicated their household food preferences. In all, preferences were given for 69 food items. In some cases (among dried beans, for example) these preferences varied by region. It was most notable that the number of respondents indicating a positive preference for any given item almost always exceeded the number expressing dislike for that item. Also, in the vast majority of cases, expressions of dislike represented personal taste (for example, perceiving an item as too sour or too sweet) rather than perceptions of poor food quality. No particular concern other than taste was mentioned by five percent or more of the respondents.

Comparison of FDPIR and the Food Stamp Program

There are distinct differences in the household characteristics of FDPIR participants versus American Indian food stamp recipients. Small households, two-thirds of which include an elderly person, constitute a much larger segment of the FDPIR caseload. Also, households with earnings seem to be more likely to participate in FDPIR. In contrast, due largely to joint application procedures, categorical eligibility for food stamps, and the co-location of administrative offices, the majority of American Indian families that receive AFDC are more likely to participate in the Food Stamp Program than in FDPIR.

Based on a small exploratory survey of American Indian households who participated in the Food Stamp Program in September 1989, a larger proportion of this group had received benefits for the previous twelve months, compared to FDPIR households interviewed for this study. This is consistent with the fact that AFDC households would tend to have longer spells of participation due to factors related to their need for assistance (specifically, deprivation of parental support), whereas households with earned income would experience shorter (though perhaps repeated) spells of participation.

Nearly half of FDPIR and food stamp households in this study indicated that they participated in both programs at different times. However, American Indian households that leave the Food Stamp Program were more likely to apply for and receive commodities under FDPIR than former FDPIR participants were to apply for and receive food stamps. In fact, this may be due to more lenient eligibility standards in FDPIR, such as a lack of a gross income eligibility standard and the treatment of household resources, particularly vehicles.

Providing commodities through FDPIR appears to be less expensive than providing food stamps to households who would be eligible. Given that American Indian households that receive commodities tend to be smaller and more likely to have earnings, they would be more likely to receive smaller food stamp allotments than the average food stamp household (either Indian or non-Indian), if they were to apply for food stamps. A simulation of food stamp eligibility for FDPIR households indicates that approximately 13 percent would not be eligible because of the gross income limitation and other factors, such as the treatment of vehicles as financial assets. Yet, our simulation suggests that it was less expensive to provide commodities to all the households that participated in September 1989 than it would have been to provide food stamp allotments to the 87 percent estimated to have been eligible for food stamps.

Travel distances are usually ten miles or less to FDPIR distribution sites, local food stamp offices and food stores. Most participants travel ten miles or less to purchase food, or apply for commodities or food stamps. However, as many as one-fourth of the participants in some regions have to travel more than 20 miles each way. The distance most participants must travel to purchase food is not significantly greater than the distance to the commodity distribution point. Also, while the distance to the local food stamp office is usually greater than the distance to the FDPIR distribution site, the difference is not great.

The combined availability of FDPIR and the Food Stamp Program provides more flexibility and a better level of service for American Indians than either program would individually.

The relative acceptability of FDPIR and the Food Stamp Program was addressed by survey and focus group participants. The choice of food stamps versus commodities is largely due to the flexibility and wider selection of foods, including fresh produce. On the other hand, a large segment of FDPIR participants interviewed for this study indicated that they applied for commodities rather than food stamps because they perceived the value of the benefit to be greater. A smaller group of FDPIR respondents felt that the effort to apply for and participate in the commodity program was less than that required in the Food Stamp Program. Thus, each program seems to offer participants distinct and readily identifiable advantages that they deem to be important.

The distinct patterns of participation suggest that the combination of FDPIR and the Food Stamp Program accommodates a diverse set of food assistance needs among different types of American Indian households. For example, regulations that require welfare agencies to allow AFDC applicants to submit a single application for AFDC and food stamps, and that establish categorical food stamp eligibility for many AFDC families, make it easier for American Indians who receive AFDC to also obtain food stamps. However, the availability of FDPIR provides other types of households, such as the elderly, with a relatively simple application process, and therefore, easier access to food benefits.

The simulation of food stamp eligibility suggests that more households - especially small households with elderly members and households with earned income - can be served at less cost by FDPIR than by the Food Stamp Program. On the other hand, the Food Stamp Program appears to be effective in reaching particular types of households (especially AFDC families) for whom the relative costs of obtaining food assistance are lower and their desire for flexibility in selecting foods is greater. Thus, the combination of FDPIR and the Food Stamp Program tends to provide a better level of service for this population than either program would individually.

The U.S. Department of Agriculture (USDA) prohibits discrimination in all of its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, political beliefs, genetic information, reprisal, or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.)

Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). To file a complaint of discrimination, write: USDA, Director, Office of Adjudication, 1400 Independence Avenue, SW, Washington, DC 20250-9410; or call (866) 632-9992 (Toll-free Customer Service), (800) 877-8339 (Local or Federal relay), or (866) 377-8642 (Relay voice users) or (800) 845-6136 (Spanish Federal-relay). USDA is an equal opportunity provider and employer.