

Chapter II

PROGRAM OPERATIONS

The Food Distribution Program on Indian Reservations (FDPIR) is unique among Federally subsidized programs in that, most often, it is not administered by an agency of State or local government, but by an Indian tribal organization.¹ In this regard, it is administratively similar to public housing and other programs in which the Federal government works directly with community-based nonprofit agencies to meet particular needs.

At the local level, many FDPIR programs operate on a rather small scale in terms of their costs of operation, the number of staff administering them, and the number of households being served. A few programs, in contrast, serve thousands of households each month. In order to develop program regulations that are responsive to the diversity of program operations, FNS needs information about all types of FDPIR programs.

In this chapter, we report the findings of our evaluation of FDPIR program operations. The first section below describes the conceptual framework for the evaluation of program operations. It is followed by a description of FDPIR program structure and administration that explains the role of FNS, States, and Indian tribal organizations in carrying out the program. The discussion in that section includes program financing and staffing patterns at the local level. The third major section of this chapter addresses three aspects of program operations—recipient relations; commodity distribution; and program integrity. In discussing each aspect of FDPIR operations, we present findings concerning the efficiency and integrity of the program as it has been implemented at the local level.

A. A MODEL OF PROGRAM OPERATIONS

On the basis of our review of plans of operation and visits to FDPIR programs, we developed a model of FDPIR program operations and impact. Exhibit II.1 summarizes the major components of this

¹As we discuss in further detail below, only five of the 50 States are involved in the administration of FDPIR. However, the Food and Nutrition Service (FNS) refers to these five States *and* 86 Indian Tribal Organizations (ITOs) that operate FDPIR programs as "State agencies" in its regulations and routine program communications.

model. Using it as a frame of reference, we describe the context within which individual FDPIR programs are administered.

The broad parameters of FDPIR program operations are set by Federal policy, which affects and ultimately is affected by, the need and demand for food assistance on reservations. The initial establishment of a program is based largely on the need and demand for such assistance by individual Indian tribes. Where programs do exist, socioeconomic and political conditions are expected to have a strong influence on their structure and administrative characteristics.

The socioeconomic and political environment of a program, its administrative structure, and Federal policy affect how it is operated. Our model delineates three functional areas within program operations—recipient relations; commodity distribution; and program monitoring—each of which encompasses several discrete activities. Recipient relations involves outreach, the certification (and recertification) of participants' eligibility, the assessment of food preferences, and nutrition education. Commodity processing includes ordering, warehousing, and distributing commodities. Program monitoring involves special efforts to control fraud and error (for example, dual participation in FDPIR and the Food Stamp Program, and pursuing claims against households), and oversight of local activity by Federal and State officials. Collectively, these three sets of activities comprise local program operations in FDPIR.

The most important product of FDPIR activities is the commodities distributed to eligible American Indian households and other low-income households living on reservations. Some measurable number of households also gain a direct benefit from nutrition education, but other activities, such as outreach and program monitoring, produce only indirect benefits for an indeterminate number of persons. Measurable program outputs provide a basis for constructing indices of efficiency.

The immediate impact of FDPIR is apparent in the rate of participation by eligible households, and their satisfaction with the commodities they receive. It is not within the scope of this evaluation to assess the impact of FDPIR in terms of ameliorating the significant nutrition-related health problems that exist among American Indians. Such an assessment would be complicated by the fact that FDPIR is a supplementary food program, and not the sole source of food for participants. Also, the impact of FDPIR is mitigated by powerful social, economic, and cultural forces that affect American Indians.

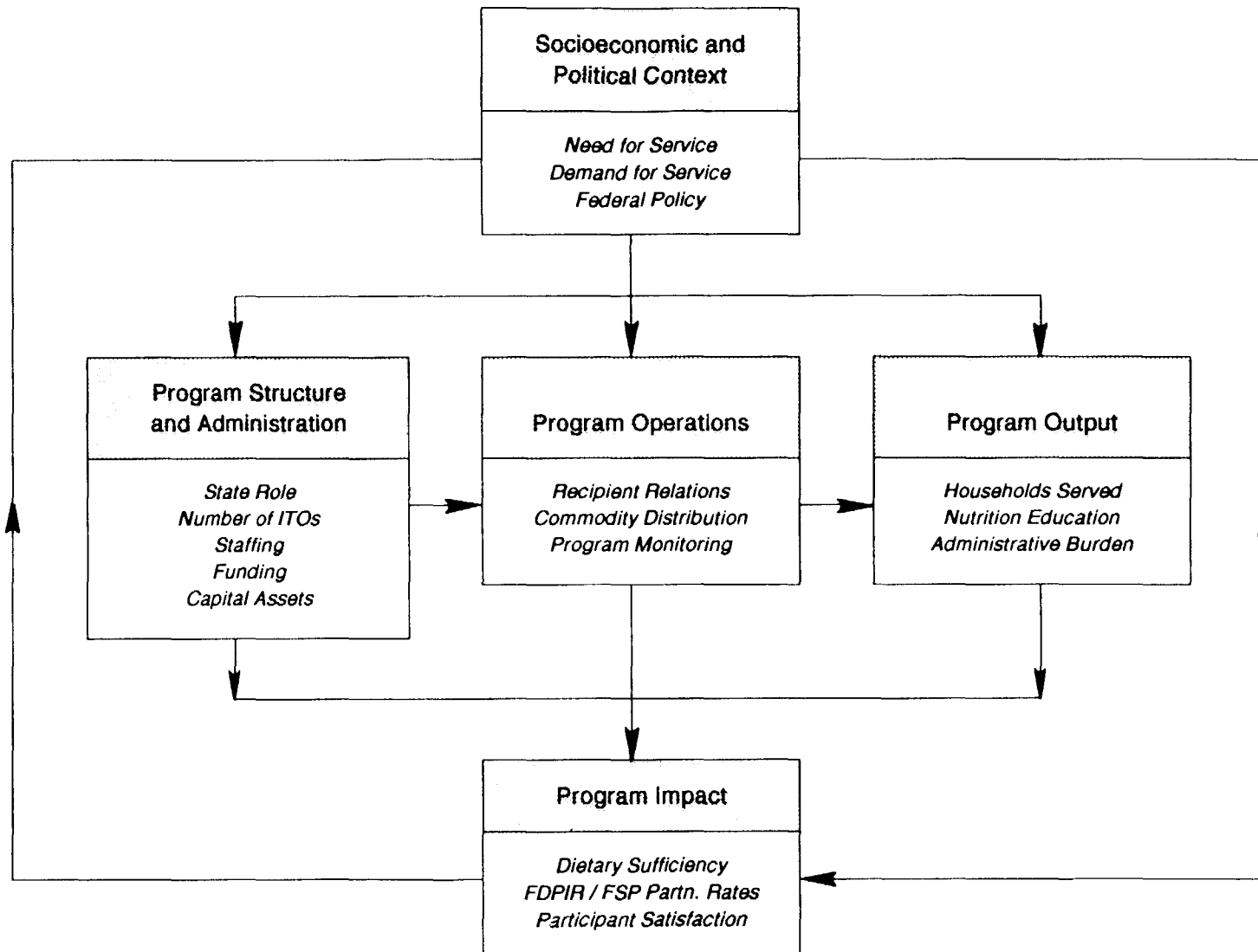


Exhibit II.1
Model of FDPIR Program Operations and Impact

In the remainder of this chapter, we discuss three of the major components of the model presented in Exhibit II.1—program structure and administration, program operations, and program output. We describe the socioeconomic context within which FDPIR is administered in Chapter III, and offer assessments of its impact on American Indians in both the third and fourth chapters.

B. PROGRAM STRUCTURE AND ADMINISTRATION

This section deals with three aspects of the organization and administration of FDPIR—organizational structure, financing, and staffing.

Organizational Structure

Our review of the 105 FDPIR programs indicated that these programs vary widely in administrative structure, staffing, funding, and capital assets. These important dimensions of program structure and administration are influenced by the socioeconomic and political environment of a program, and create the organizational context within which it operates. It would be useful, therefore, to develop a typology of programs to help summarize and describe the organizational context of FDPIR program operations.

Some of the most important findings of our site visits have to do with the structure of FDPIR programs in terms of the roles of States and ITOs. Five FDPIR programs are classified as State-administered—Montana, Nevada, North Carolina, North Dakota, and South Dakota. During our preliminary site visits, however, it became apparent that, with the exception of Nevada, these States have little direct involvement in certifying households to receive FDPIR commodities, or in distributing commodities to households. Instead, they play an oversight role similar to that of FNS Regional or Field Offices, and provided central warehousing for foods received from FNS and transferred to local reservation warehouses.

We identified three basic models of State-administered programs:

Model 1

In Montana, North Dakota, and South Dakota, an agency of the State exercises general oversight for the program, provides central warehousing for commodities ordered from USDA, distributes food to reservation warehouses, and works with five to seven tribal governing bodies whose staff certify the eligibility of individual households and distribute food to certified households.

Model 2

In North Carolina, the State agency operates a warehouse from which a single ITO obtains supplies for its own warehouse. Again, the State is responsible for monitoring the administration of the program, but local staff employed by the tribal governing body are responsible for certifying households and distributing food to them, as well as managing all other aspects of program operations, such as nutrition education.

Model 3

In Nevada, the State directly administers the program. Households on ten reservations participate in the program, but tribal governing bodies are not involved in the administration of FDPIR (except in relatively minor roles, such as providing volunteers or temporary paid workers to help with tailgate distribution). Two other ITOs administer FDPIR programs in Nevada that are independent of the State (the same is true of three ITOs in South Dakota).

In all cases except Nevada, individual tribal governing bodies in State-administered programs have responsibilities that are very similar to ITOs that operate the program independently (i.e., certifying households, ordering and distributing commodities, and managing warehouses). The key distinction, again, is that a State agency, not FNS, directly oversees the program.

Given the relative independence of the programs administered by tribal governing bodies under State supervision, we felt it was appropriate for the purposes of this study to treat such programs as the equivalents of those ITOs that operate independently of a State agency. Following this logic, as of September 1989, there were 105 programs operating in the United States, and they fit one of the following categories:

- 86 programs administered independently of a State agency by one or more ITOs;
- one program for several tribes administered directly by a State (Nevada);
- one program administered by a single tribe under contract with a State (North Carolina); and
- 17 programs administered by ITOs under contract through three State agencies (Montana, North Dakota, or South Dakota).

Among the 86 programs administered independently by ITOs, there is further variation in terms of the number of ITOs involved, and the role of each ITO when a consortium is involved. Given that 217 reservations and other Indian land areas are served by 105 FDPIR programs, there are some programs that involve more than a single ITO. There are a few programs in which several ITOs are cooperating in the administration of a program, typically through a service delivery organization that provides other human services in addition to food assistance. In other cases, one tribe may enter an agreement with another nearby tribe to extend service outside its own reservation or service area. For example, one of the large programs provides warehousing and commodity distribution services to a number of smaller tribes who lack warehouse space.

Exhibit II.2

A Typology of FDPIR Program Structure

| Number of ITOs Directly Administering the Program | State Government Involvement (number of programs) | | |
|---|---|-----------------------|-------------------|
| | No Involvement | Direct Administration | General Oversight |
| No ITO Involvement | N/A | A (1) | N/A |
| Single ITO | B (59) | C (0) | D (18) |
| Two or More ITOs | E (27) | F (0) | G (0) |

As shown in Exhibit II.2, the two dimensions of State government involvement and the nature of ITO involvement help define the broad parameters of a typology of FDPIR programs. We did not find any evidence that some types of programs defined by this paradigm (for example, C and F) actually exist. Given that Nevada is the only State fitting type A, the other 18 "state administered" programs involve general oversight by an agency of State government in Montana, North Carolina, North Dakota, or South Dakota. In all 18 cases, a single ITO is involved; therefore, they are categorized under D.

Among the 86 programs operated independently of an agency of State government, about two-thirds (59) involve a single ITO. The

remainder of the programs (27) involve a variety of intertribal agreements under which a single program serves as many as 17 different reservations or other Indian land areas. Thus, the vast majority of programs are operated by ITOs under direct oversight by FNS.

There are various reasons why an ITO might choose to structure a local FDPIR program in one way or another. Perhaps most important are administrative capability and warehouse capacity. If there is only a small warehouse on a reservation, for example, it might be to a tribe's advantage to operate a program in cooperation with a State that can provide central warehousing and more frequent deliveries to the reservation than is possible for FNS. Or, if ITOs already are cooperating as a group in the delivery of other human services, FDPIR is simply an extension of those services. Ultimately, FNS decides (based on a proposal submitted to it) whether an ITO, a group of ITOs, or a cooperative arrangement between a State and an ITO provides the administrative capacity necessary to operate a program.

**Program
Finances**

The programs described above vary considerably in size, and therefore, in their cost of administration. Approximately half of the 105 programs (52) serve, on average, 250 or fewer households per month. The median number of households served monthly is 127. Of the other 53 programs, 48 provide commodities to an average of 250 to approximately 1,200 households each month (with a median number of households equaling 362). The five largest programs serve more than 1,200 each month (a median of 1,822 per month), with the Navajo program averaging 7,456 per month in Fiscal Year 1989 . Together, these five programs served more than one-third (35.9 percent) of the households that participated in an average month in FY1989.

FNS regions tend to be composed primarily of small programs, with fewer medium sized programs, and no more than two large programs. Exceptions to this include the Southwest Region, with 13 medium sized programs and only four small and two large programs, and the Southeast and Northeast Regions, which have a total of five small and medium programs across both regions, with no large programs.

Exhibit II.3

Annual Administrative Costs by Functional Categories and Program Size

| FUNCTIONAL CATEGORY | Program Size Category [*] (Number of Sample Programs) | | | | | | | |
|------------------------|---|--|------------------------------------|--|------------------------------------|--|------------------------------------|--|
| | Small (15) | | Medium (10) | | Large (5) | | Total (30) | |
| | Percent- age of Total (%) | Expen- ditures Per House- hold (\$) | Percent- age of Total (%) | Expen- ditures Per House- hold (\$) | Percent- age of Total (%) | Expen- ditures Per House- hold (\$) | Percent- age of Total (%) | Expen- ditures Per House- hold (\$) |
| Certification | 29 | 171 | 29 | 126 | 22 | 56 | 27 | 137 |
| Storage/Distribution | 57 | 352 | 52 | 229 | 70 | 207 | 57 | 287 |
| Nutrition Education | 6 | 40 | 5 | 26 | 3 | 8 | 5 | 30 |
| Other | <u>10</u> | <u>51</u> | <u>14</u> | <u>61</u> | <u>7</u> | <u>16</u> | <u>10</u> | <u>48</u> |
| All Functions | 102 | 614 | 100 | 442 | 102 | 287 | 99 | 502 |

^{*}Some column percentages do not sum to 100% due to rounding.

The budgets of these programs reflect this variation in size. Among the 30 programs included in the evaluation sample, the smallest administrative budget for FY1989 was \$40,536, while the largest was \$2,037,201 (Federal, State, and local contributions combined). Exhibit II.3 shows how these resources were allocated among the major functional categories of certification, storage and distribution, nutrition education, and other. The latter category includes other personnel expenditures, travel, equipment, supplies and unspecified contracts expenditures which do not fall within the first three functional categories.

The expenditures per household shown in the above table suggest that the larger FDPIR programs achieve an economy of scale in serving their clients. Their annual administrative cost per household (\$287) is less than half that of the small programs (\$614). Similarly, the medium-sized programs fall between the large and small programs in terms of the cost per household. However, these data alone should not necessarily lead to the conclusion that larger programs are more efficient.

As we discuss in a section below, many small programs operate with only two fulltime staff members, sometimes supplemented by part-time workers. While many program activities during a typical month require the efforts of two fulltime employees as well as part-time workers, there are some periods when the workload is lighter because of the small number of households being served. This periodic fluctuation in caseload and program staff appears to occur across small, medium and large FDPIR programs. However, other than regulating the time of part-time staff, it is not possible to make further adjustments in staffing without reducing the small core staff to part-time roles. This would threaten continuity in program operations, and possibly, accountability. Therefore, any overall assessment of program quality and efficiency would need to consider not only the resources used, but also the stability of program operations and the level and quality of service, as well as cost.

The cost figures shown above also indicate that more than half of the cost of administering FDPIR programs is attributable to storage and distribution. This includes warehouse space, the cost of warehouse supervisors and workers, truck drivers for tailgate runs, and equipment such as forklifts. Approximately one-fourth of program costs is related to the certification of households that apply for commodities. Across the sample programs, only five percent of total administrative expenditures is devoted to nutrition education. As we discuss in more detail below, regulations encourage local FDPIR officials to coordinate community nutrition education services for the benefit of their participants, but they are not required to allocate a specific level of program resources for this purpose.

In an effort to monitor administrative costs in the program, FNS uses two measures of financial performance. One measure views administrative costs as a percentage of the value of the commodities distributed by each program. The established guideline is 30 percent and an assessment against this guideline is required as part of the annual budget submitted by each ITO or State. Exhibit II.4 shows that only ten programs failed to meet this guideline in FY1989 and all of them were located in the Midwest or Mountain Plains Regions. The table does not reveal, however, the fact that all of these programs were small. Given the economy of scale shown in Exhibit II.3, this finding indicates that it may be more difficult for smaller programs to meet the flat-rate performance guideline.

Unless they can provide "compelling justification" that circumstances prevent them from doing so, States and ITOs that operate FDPIR programs must provide 25 percent of the financial resources re-

quired to administer the program. FNS may provide more than 75 percent of the funds required to administer a program if, according to §253.9(a) of the regulations, there is a "need to assure that no State agency currently operating the program receives a level of funding that would cause a diminution of program services." As a result, FNS has a good deal of discretion in negotiating budgets with States and ITOs that operate FDPIR programs, and no penalties have been imposed for not meeting the 25-percent matching requirement. The FY1989 data indicate that the requirement is more of a "goal" than a strict requirement. However, FNS does require a strict review of the compelling justification.

Exhibit II.4

Financial Performance by Region for Fiscal Year 1989

| Performance Measure | Percentages of Programs, by Region (Number of Programs) | | | | | Total (%) |
|--|--|-----------------------------------|--------------------------------------|--------------------------|---------------------|--------------|
| | Midwest (21) (%) | Mountain Plains (29) (%) | Northeast Southeast (5) (%) | Southwest (19) (%) | West (31) (%) | |
| Percentage of Programs with Administrative Costs Exceeding 30% of the Value of Commodities | 28.6 (6) | 13.8 (4) | 0 | 0 | 0 | 9.5 (10) |
| Matching Fund Rate: | | | | | | |
| 20.0% - 24.4% | 14.3 (3) | 20.7 (6) | 60.0 (3) | 0 | 0 | 11.4 (12) |
| Less than 20.0% | 33.3 (7) | 24.1 (7) | 0 | 68.4 (13) | 0 | 25.7 (27) |

Our review of FY1989 plans of operation indicated that it was difficult for some ITOs and States to meet this matching funds requirement. For example, 25.7 percent of the programs fell below 20 percent, while 11.4 percent fell within five percentage points of the matching fund rate. Exhibit II.4 shows that more than two-thirds (68.4 percent) of the ITOs in the Southwest Region provided less

than 20 percent of the funds required to administer the FDPIR programs they operated. Although more programs came closer to the 25-percent target figure in the Midwest, one-third fell below 20 percent. Similarly, nearly half of the programs in the Mountain Plains (44.8 percent) could not meet the matching requirement.

It is notable that all programs in the Western Region met both the 30-percent cost guideline and the 25-percent matching requirement, even though, for example, the distribution of programs, by size, is similar to other FNS service regions. However, these measures of efficiency must be considered in relation to (1) the availability of commodity items in the West, and (2) the high level of need in that region. The first point is discussed later in this chapter, while the second is addressed in Chapter III.

Less than half of the matching requirement (defined as the total of cash and in-kind contributions) offered by ITOs and States involved a direct cash outlay. As shown in Exhibit II.5, approximately half (49.6 percent) of the matching requirement across all 30 sample programs was met by the donation of warehouse and office space for use by FDPIR staff. The value of this space was determined from estimates based on prevailing local market rates for leased space, and from Regional FNS officials' judgement of what was reasonable.

Some of the small and medium-sized programs used the value of free labor to meet part of the matching requirement. This involved the use of persons providing community service in lieu of probation, corrections inmates participating in prerelease programs, volunteers, and public assistance recipients involved in work experience programs.

In general, the five large programs made the most substantial cash outlays in meeting the matching requirement. Expenditures for personnel (28.2 percent of the total match) and nonpersonnel costs (23.8 percent of the total match) among the large programs amounted to more than half the matching requirement for this group. In contrast, the medium-sized programs had direct cash outlays amounting to 20.9 percent of the matching requirement, while the value of warehouse space accounted for two-thirds of the match for these ten programs. Small programs were those most likely to rely on in-kind labor to meet the matching requirement.

Exhibit II.5

Matching Fund Contributions
by Program Size: Percentage of Total Expenditures, FY1989

| NATURE OF CONTRIBUTION | Program Size Category (Number of Sample Programs) | | | Total (30) |
|------------------------------|--|----------------|--------------|---------------|
| | Small (15) | Medium (10) | Large (5) | |
| CASH | | | | |
| Personnel Expenditures | 20.8 | 12.1 | 28.2 | 24.9 |
| Non-Personnel Expenditures | <u>5.9</u> | <u>8.8</u> | <u>23.8</u> | <u>19.6</u> |
| Subtotal | 26.7 | 20.9 | 52.0 | 44.5 |
| IN-KIND CONTRIBUTIONS | | | | |
| Warehouse/Office Space | 46.4 | 66.2 | 46.3 | 49.6 |
| Labor and Other | <u>19.5</u> | <u>6.5</u> | = | <u>2.8</u> |
| Subtotal | 65.9 | 72.7 | 46.3 | 52.4 |
| INDIRECT CHARGES | | | | |
| | <u>7.4</u> | <u>6.4</u> | <u>1.7</u> | <u>3.0</u> |
| Total | 100.0 | 100.0 | 100.0 | 99.9 |

Program Staffing

Staffing a local FDPiR program involves a fairly narrow range of positions. The largest programs are distinguished only by the levels of supervisory positions within four broad areas of activity—program administration and supervision; certification; distribution; and nutrition education. In small programs, it is not uncommon for one individual to serve in all four areas, and one-fifth of the programs in the evaluation sample are two-person operations, sometimes supplemented by part-time workers.

Consistent with the financial data described above, we also observed an economy of scale in program staffing in that the number of households per fulltime equivalent (FTE) staff was higher in larger programs. For FY1989, large programs served an average of 99.6 households per month per FTE, while medium-sized programs served 80.2 households per FTE, and small programs served 65.7 households per FTE. Among the small programs, however, there was considerable variation in this measure. For example, the ratio

of households to FTEs ranged from extreme lows of 29 and 31 per FTE in two small programs to an unusual high of 191 in one program. Most ranged from 43 to 76. The range of ratios among medium-sized programs was 50 to 106 households per FTE, and large programs ranged from 65 to 143 households per FTE.

Exhibit II.6 lists the most common staff positions in FDPIR programs included in the evaluation sample.² In addition to the program director's position, which often involved certification and warehouse work in the small programs, the positions most often established in these programs were those for certifiers and warehouse workers. Except for two very experienced assistant directors in small programs, this and other supervisory positions were found almost entirely in large and medium-sized programs. The same was true of secretarial positions, although two small programs in the sample had such a position.

One of the noticeable and consistent characteristics observed among FDPIR staff was their longevity working in the program. Among warehouse workers and certifiers, the average incumbent had three or four years' experience. Consistent with our expectations, supervisors usually had even more experience, with the directors of the large programs being the most senior with 11.8 years on average. We were surprised to learn, however, that some part-time workers, persons who work only a few hours per month, also had worked with some of the programs for many years. The relatively long tenure of FDPIR staff cannot be viewed apart from the high levels of unemployment reported on most reservations.³ Under these circumstances, regular employment, even in a part-time capacity, would be highly valued.

Although requirements for formal training were minimal, supervisory positions generally require relevant work experience, typically involving supervisory responsibility or extensive experience in the type of work being supervised (for example, warehouse work and inventory control procedures). This requirement is consistent with the Federal standards that staff be hired through a merit system, but also reflects the local labor market conditions described above. It

²A detailed listing of job titles is provided in Appendix E of Volume 2 to show how we derived these general categories.

³See a report by the Bureau of Indian Affairs, Indian Service Population and Labor Force Estimates, January 1987.

Exhibit II.6

Average Fulltime Equivalent Salaries, Years of Experience, and Number of Employees
Filling Most Common FDPIR Staff Positions

| POSITION | Program Size Category (Number of Sample Programs) | | | |
|---------------------------------|--|----------------|--------------|---------------|
| | Small (15) | Medium (10) | Large (5) | Total (30) |
| DIRECTOR | | | | |
| Salary (\$) | 19,441 | 22,025 | 24,735 | 21,185 |
| Experience (Yrs) | 7.6 | 4.0 | 11.8 | 5.1 |
| Fulltime/part-time (N) | 12/3 | 10/0 | 5/0 | 27/3 |
| ASSISTANT DIRECTOR | | | | |
| Salary (\$) | 20,046 | 16,767 | 19,532 | 18,623 |
| Experience (Yrs) | 8.5 | 5.2 | 7.2 | 6.8 |
| Fulltime (N) | 2 | 3 | 4 | 9 |
| CERTIFICATION SUPERVISOR | | | | |
| Salary (\$) | -- | 15,488 | 18,102 | 16,795 |
| Experience (Yrs) | -- | 8.8 | 8.0 | 8.5 |
| Fulltime (N) | 0 | 3 | 3 | 6 |
| CERTIFIER | | | | |
| Salary (\$) | 12,504 | 14,077 | 14,012 | 13,515 |
| Experience (Yrs) | 2.9 | 4.3 | 6.8 | 4.1 |
| Fulltime (N) | 8 | 15 | 31 | 54 |
| WAREHOUSE SUPERVISOR | | | | |
| Salary (\$) | 12,000 | 14,884 | 17,582 | 15,449 |
| Experience (Yrs) | 6.0 | 4.3 | 7.5 | 5.0 |
| Fulltime (N) | 1 | 9 | 11 | 21 |
| WAREHOUSE WORKER | | | | |
| Salary (\$) | 13,552 | 12,155 | 11,552 | 12,705 |
| Experience (Yrs) | 3.8 | 2.8 | 3.0 | 3.3 |
| Fulltime/part-time (N) | (8/6) | (18/1) | (42/0) | (68/7) |
| SECRETARY | | | | |
| Salary (\$) | 12,562 | 11,569 | 10,352 | 11,249 |
| Experience (Yrs) | 6.3 | 3.1 | 3.2 | 4.4 |
| Fulltime (N) | (2) | (3) | (13) | (18) |

also suggests that many staff have a considerable investment in their jobs and, regardless of the level of training and experience they bring to their jobs, can develop their skill through experience. The value of this experience was a factor several FNS Regional staff highlighted in describing the administrative capacity of FDPIR programs.

The pattern of average salaries across the positions is consistent with the levels of complexity and responsibility associated with the jobs summarized in the exhibit. Directors and assistant directors received the largest salaries, certification supervisors and certifiers the next largest, and warehouse staff and secretaries received the lowest salaries. It is notable, nevertheless, that the range of salaries—across positions and across programs of different sizes—was not great. For example, warehouse workers averaged \$12,705, compared to \$21,185 for program directors.

C. PROGRAM OPERATIONS AND OUTPUT

In this section, we discuss the three areas of FDPIR program operations identified in the model presented in Exhibit II.1—recipient relations; commodity storage and distribution; and program monitoring. Also, to integrate the discussion, we discuss program output within each of these areas.

Recipient Relations

The term recipient relations refers to four specific aspects of program operations. These include outreach, certification, nutrition education, and assessing food preferences. We address each in the following sections.

Outreach. To ensure that FDPIR reaches potentially eligible non-participants, regulations governing the operation of FDPIR require that local program officials publicize the available benefits and encourage participation in the program. It was not within the scope of this study to determine the degree to which programs were effective in reaching such persons. However, nearly all the program directors interviewed reported that most of the potentially eligible population in their service areas know FDPIR benefits are available and where an application can be filed. Working from this premise, they concentrated their efforts on notifying participants and potential applicants of the monthly distribution schedule. Most programs used fliers for this purpose and posted them in tribal buildings. Several programs were able to have public service announcements made each month on local radio stations, and a few program direc-

tors made occasional presentations on talk shows to inform the community about the program. A number of directors reported that food demonstrations were open to the public and were an effective means of creating a positive image about the program.

The Food Distribution Program on Indian Reservations, as indicated by its name, was created to address the special needs of persons living on or near Indian reservations. Regulations do not stipulate that participants must be tribal members, except for households that live in areas outside a reservation that FNS has authorized local programs to serve. Consistent with these guidelines, we found that households in the study sample reflected a surprising diversity in terms of ethnicity and tribal affiliation. First, only five Oklahoma programs out of the 30 programs in the sample had eligibility requirements that precluded service to non-Indians. These programs are authorized to require tribal membership for eligibility because reservations *per se* do not exist in Oklahoma. Overall, 13.6 percent of the sample household members in our survey of participants were not members of an Indian tribe.

Second, the persons served by the 30 sample programs represented nearly 100 tribes. In fact, the caseloads of 22 of these programs included persons representing at least five different tribal groups.⁴ Other than the situation in which ITO eligibility guidelines specifically target tribal members, it appears that programs follow the guideline of offering benefits to any household that is financially eligible and resides within a specified service area.⁵ In fact, one program ran newspaper advertisements that did not associate the program with the ITO in order to prevent potentially eligible persons from assuming that they had to be affiliated with a tribe to receive FDPIR benefits (the staff of this program felt that they already were reaching most tribal members who were in need).

Another dimension of outreach is the potential obstacle to participation posed by language barriers. In only two sample programs did program directors report more than five percent of the households they served as not using English as their primary language. Nevertheless, in every sample program, a member of the staff or

⁴The extreme tribal diversity in some programs' caseloads is illustrated by two programs, one of which served persons representing 14 tribes and the other which served persons affiliated with 13 different tribes.

⁵Programs that have been authorized to provide benefits in "near areas," that is, areas off the reservation, but nearby, limit eligibility to tribal members who live in those areas.

some other resource person (for example, a tribal official at a nearby office) could assist in translation. In fact, for some programs, speaking the native tongue was a job requirement. It appeared, therefore, that adequate measures had been taken to avoid problems in this area.

Certification. The FDPIR certification process involves three phases of activity for certification specialists. These phases include initial certification of households, recertification of households that continue to need assistance at the end of their established certification period, and reassessments of eligibility when changes of circumstance are reported before the end of a household's certification period. The certification process is similar to that in the Food Stamp Program and other means-tested income assistance programs (see the discussion in Chapter IV) in that household size, composition, financial assets, income, and expenses must be ascertained, and in certain cases, independently verified.⁶ However, as we discuss in Chapter IV, the procedures followed in FDPIR are not as stringent as those in other programs, and according to focus group comments, seem to result in a simpler application process and a lower burden of participation for eligible households (for example, FDPIR does not require monthly reporting or work registration).

The fact that the amount of FDPIR benefits does not vary according to household income, but depends solely on household size, means that the determination of household income does not have to be as precise as it is in the Food Stamp Program and other income assistance programs. Regulations require verification of gross income; this verification is often completed during the application process or during the preliminary one month certification period. However, no complex calculations of benefit amounts based on income are required. Therefore, once a certification specialist determines that a household's financial resources are within limits (regulations require verification of assets only if the certification specialist feels that an applicant's statement is questionable), the final determination of income-eligibility is straightforward. As a result, program directors reported on average that three-fourths of eligible applicants received food the day they applied, even though very few programs formally processed more than five applications a month as expedited service.

⁶The procedures used to verify information are discussed below in the section on program integrity. In this section, we focus more on the activities and workload related to certification.

Unlike in the Food Stamp Program, if a household applying for commodities under FDPIR cannot provide documentation to support its stated level of income, the household can be certified for one month pending receipt of the necessary documentation. This procedure makes it possible for certification specialists to determine eligibility within a few minutes after receiving a completed application form. However, staff also reported that they offer informal assessments of potential eligibility to nonparticipating households that call or come into the office to inquire about the program. In other words, the use of a denial rate (e.g., the proportion of denied cases divided by the number of applications in a given month) is not a good performance indicator of administrative effectiveness. The fact that only five of the 30 sample programs reported formally denying more than 10 cases in the study reference month tends to confirm the prevalence of this practice.

The relative simplicity of the FDPIR application (and recertification) process makes it possible for certification specialists to conduct business away from their offices with minimal administrative support (e.g., access to equipment such as telephones, calculators, computers, or typewriters). Nearly half of the sample programs enhanced their accessibility by operating tailgate application and distribution systems in which commodities are carried by truck to different population centers in a program's service area. In addition to receiving commodities at these sites, households may apply for benefits or be recertified to participate. This often enables them to avoid a longer trip to the central office or warehouse.

The common use of tailgate distribution and certification is apparent in Exhibit II.7, especially among large and medium-sized programs which generally serve larger geographic areas. While the majority of applications and recertifications across all sample programs were received and processed at the main office or warehouse, nearly half of the applications and recertifications processed in the large programs were handled at tailgate sites. Also, in a few cases, usually those involving elderly or disabled persons who could not visit the office or tailgate site, applications were submitted by mail and a certification specialist visited the applicant's home to complete the application and obtain additional information.

Exhibit II.7

Proportion and Mean Frequency of Certification Activities by Size of Program
and Nature of Activity for September 1989

| ACTIVITY | Program Size Category (Number of Sample Programs) | | | |
|--------------------------------|--|----------------|--------------|-------------|
| | Small (15) | Medium (10) | Large (5) | All (30) |
| APPLICATIONS | | | | |
| | Percentage by Program Size | | | |
| Filed at Main Office/Warehouse | 92 | 86 | 54 | 66 |
| Filed at Tailgate Site | 8 | 13 | 46 | 34 |
| Filed Elsewhere | <u>0</u> | <u>1</u> | <u>0</u> | <u>0</u> |
| Total | 100 | 100 | 100 | 100 |
| (N) | (12) | (91) | (194) | (100) |
| RECERTIFICATIONS | | | | |
| Done at Main Office/Warehouse | 70 | 69 | 52 | 55 |
| Done at Tailgate Site | 30 | 29 | 48 | 44 |
| Done Elsewhere | <u>0</u> | <u>2</u> | <u>0</u> | <u>1</u> |
| Total | 100 | 100 | 100 | 100 |
| (N) | (27) | (103) | (555) | (229) |
| INTERIM CHANGES* | | | | |
| | Mean Frequency by Program Size | | | |
| Reported by Telephone | 1 | 4 | 7 | 4 |
| Mail Report | 0 | 1 | 6 | 2 |
| In-Person at Office/Warehouse | 1 | 3 | 34 | 13 |
| Report at Commodity Pickup | <u>2</u> | <u>4</u> | <u>23</u> | <u>10</u> |
| Total | 4 | 12 | 70 | 29 |

*Due to infrequent occurrence, percentages for interim changes would not be reliable.

The area of greatest activity is the recertification of eligible households. On average, agencies in the study processed more than twice

as many recertifications as initial applications in September 1989.⁷ In contrast, relatively few households reported interim changes in circumstance during an active certification period. Given that the certification specialist establishes the length of each household's certification period, agencies can control their recertification workload by carefully establishing the length of certification. If more households have long certification periods, fewer recertifications have to be processed for a given number of participating households.

Based on data in their case records, only 27.3 percent of the households in the study sample had a 12-month certification period. One-fourth (25.1 percent) had a six-month certification, 11.5 percent had three months, 7.9 percent had a one-month certification, and the remainder had less frequently used periods such as four months or seven months. However, in contrast to these findings, program staff estimated that 41 percent of the households in their caseloads had certification periods of the maximum 12 months.⁸

An interesting pattern emerged in the certification periods reported by program staff in different sized programs. Certification specialists in small programs reported granting longer certification periods than those in medium-sized programs, and in turn, those in medium-sized programs tended to grant longer certification periods than those in large programs. Forty-seven percent of the households in the small programs were reported to receive 12-month certifications, compared to 41 percent of the medium-sized program caseload, and 36 percent of the large-program caseloads. The tendency toward shorter certification periods in the larger programs implies a somewhat heavier recertification work load in programs of this size.

The shorter certification periods granted in large programs also suggests that certification specialists in larger programs feel less familiar with individual participants, and therefore are more cau-

⁷A very high proportion of applications by households currently not receiving commodities involves households that participated in FDPIR at some earlier point. As a result, program staff reported that they rarely received applications from households that had never participated. This response is consistent with program participation data obtained in the household survey (see the discussion in Chapter IV).

⁸Program staff estimates generally reflected longer certification periods than were indicated by our survey data. For example, they also reported that 31 percent had six-month certification periods, and 13 percent had three-month periods, with the remaining 15 percent scattered.

tious in granting long certification periods. However, whatever sense of detachment may exist does not seem to affect the rate at which new applications are denied. The rate of denials in September 1989 was 15.4 percent among small programs, 16.2 percent among medium-sized programs, and 14.5 percent among the large programs.

Nutrition Education. The effectiveness of food assistance programs is a function of a variety of factors, including the impact a given program has on the amount of food actually consumed by participants, the quality of food obtained through the program, and the ability of households to optimize their food resources. This last factor is a special concern in FDPIR because many food items provided by the program require preparation, and for those with nutrition-related health problems, special preparation techniques may be necessary. Thus, basic knowledge and willingness on the part of household members to properly prepare food is needed, and will affect the foods' nutritional value. Further, the selection of food for consumption, both from FDPIR and other sources, will influence the nutritional quality of the diet. Finally, the nutritional quality of the diet and selected other lifestyle factors have a profound impact on the health of the program's target population. As a result, local FDPIR programs are required to include selected nutrition education components.

Federal regulations (§253.5 [g]) governing FDPIR specifically require the following activities:

- publicize how commodities may be used to contribute to a nutritious diet and how commodities may be properly stored;
- encourage appropriate organizations, county extension home economists, [Expanded Food and Nutrition Education Program (EFNEP)] aides, and qualified volunteers to provide food and nutrition information, menus, or cooking demonstrations; and
- encourage the dissemination of food and nutrition information designed to improve the nutrition of households on Indian reservations.

The availability and usage of FDPIR nutrition education resources are assessed and discussed below based on data from administrative interviews and program document abstraction at the 30 FDPIR programs, as well as during the three focus group discussions with FDPIR participants. This discussion is followed by a description of the components of an optimal nutrition education program.

Special Food and Nutrition Concerns. During structured interviews, program directors confirmed special diet and food concerns related to their recipient population which had been identified in their most recent FDPIR plan of operation. Twenty-nine out of 30 directors reported that diabetes is a disease of special concern in their service area. Eighteen reported hypertension, and 17 reported obesity as nutrition-related health issues of major concern, while 4 each also reported alcoholism and heart disease. High cholesterol and low-iron status were both mentioned once. This is remarkably consistent with focus group discussions, during which diabetes, hypertension and obesity were identified as major health problems in all three discussion groups. Other nutrition-related health problems mentioned in the focus group discussions included alcoholism, heart disease, high cholesterol, cancer and stomach ulcers. As we discuss in Chapter III, these observations are consistent with the scientific literature on American Indian nutrition and health status, as well as the findings of the FDPIR household survey.

Nutrition Education Expenditures. In light of the nutrition-related health concerns expressed by program staff, it was surprising to find that eight of the 30 programs, or approximately one-fourth (26.7 percent, representing all sizes of programs and three different regions) reported no nutrition education budget. Four of these same eight programs reported coordinating nutrition education activities with staff of other community programs, although only two reported actual activity being conducted. Another 17 programs reported annual nutrition-education budgets under \$18,075, roughly the starting salary of a nutritionist.⁹ Although only two programs actually employed fulltime nutritionists, the remaining five programs reported nutrition education budgets ranging from \$21,308 to \$181,086, with the budget for the largest program more than six times larger than that of the second largest program. On average, the sample programs reported spending about \$30 per household per year on nutrition education, or an average of \$13,132 per program per year. These expenditures represent about five percent of an average annual administrative budget, and they ranged from zero to 24.9 percent for individual programs.

One of the tribes making a substantial financial commitment to nutrition education operates the largest FDPIR program in the country. For FY1989 this tribe committed 8.9 percent of its FDPIR

⁹Proceedings of the Continuing Education Conference of the Association of State and Territorial Public Health Nutrition Directors. Editor, Mildred Kaufman, MS, RD, June 4-7, 1989, p. 22.

administrative budget to nutrition education and employed one of the two professional nutritionists reported on the staff of the 30 sample programs. It also employed five full-time nutrition aides (no other program reported having such staff). In this one program, more than half (53 percent) of the FDPIR nutrition education budget was derived from tribal resources.

The second largest financial commitment to nutrition education was made by a program with a nutrition education budget of \$28,332 (9.8 percent of its FDPIR administrative budget). The third largest nutrition education budget was reported by the only other FDPIR program that employed a nutritionist. This large program spent 3.3 percent of its operating budget on nutrition education (\$26,583), and employed the nutritionist part-time.

Nutrition Education Staff Support. Nearly two-thirds of the 30 sample programs reported personnel expenditures related to nutrition education. As already mentioned, however, only two of these 19 programs reported having nutritionists on staff. Personnel support ranged from \$100 to \$19,923 per year and averaged \$6,424 for the 17 programs reporting nutrition education personnel expenditures (excluding the two programs with nutritionists on staff). In only one program did a nutrition educator from another program receive compensation for services.

The tribes reporting nutrition education personnel expenditures based these expenses on FDPIR staff who provided some form of nutrition education (for example, certifiers who distributed information on food preparation such as recipes and cookbooks). With few exceptions, FDPIR personnel had no formal training in either nutrition or health education.

Nutrition Education Services. The nutrition education services provided by FDPIR programs conform to those mandated by Federal regulations outlined above. Of the 30 programs included in the survey, 25 reported distributing nutrition education materials to program participants. Nearly three-fourths of the programs (22) reported that they often coordinated with staff from other programs (for example, home economists from the county extension service or Indian Health Service [IHS] personnel) in sponsoring food preparation demonstrations.

Generally, program directors considered demonstrations less effective than distributing printed material in reaching program participants, with ranges of contact from less than five to 100 percent of

the program population. The directors reported that many more participants were reached through printed food information materials, because they were often distributed during key program activities (i.e., certification and food pickup). Both the distribution of printed nutrition education materials and food preparation demonstrations were considered as program outreach opportunities, and therefore, were available to non-participants in 68 and 73.7 percent of the programs, respectively.

Most commonly, nutrition education materials took the form of recipes and cookbooks. About three-fourths of the programs (76.7 percent) reported providing recipes to FDPIR participants and 53.3 percent reported providing cookbooks at some point in the recent past. Approximately one-fourth of the programs (26.7 percent) reported using newsletters as a means of popular education, and almost one half (46.7 percent) reported using other education materials, such as fact sheets, pamphlets, posters, and videos.

Eleven of the 30 sample programs reported coordinating with existing nutrition education resources on or near the reservations to produce program-specific nutrition education materials. This assistance generally took the form of developing recipes and offering food demonstrations. Sources of this technical assistance usually were staff from local WIC programs, the IHS and the Agricultural Extension Service. Program staff also could use recipes developed by USDA and available through the National Agricultural Library.

Qualitative Assessment of Nutrition Education Materials. In our visits to programs involved in the study, we collected nutrition education materials so that a nutritionist on the study team could make a qualitative assessment of them. This assessment included:

- the types of nutrition material used;
- whether these materials provided information on food handling and preparation (i.e., recipes and cookbooks) or were nutrition-based (recommendations for improved diet quality or guidelines for specialized diets);
- the sources of these materials and publication dates (if available).

The results of this assessment are summarized below.

Nutrition education materials generally fit four categories: recipes, cookbooks, newsletters and general food and nutrition information. These materials often were not available to the data collectors during the survey, and the most commonly reported reason for this was that the materials were temporarily out of stock or were no longer available. Thus, nearly a third of the 22 programs reporting that they provided recipes to program participants could not provide copies to data collectors. Fifteen programs reported using cookbooks, although slightly more than half could not provide a copy. Similarly, we could not obtain copies of newsletters from 29 percent of the programs and general food and nutrition information reported to be used was only available in about a third of the cases. Therefore, the following discussion is based only on those materials available for analysis.

For the first three categories—recipes, cookbooks and newsletters—the content was largely the same. In other words, recipes were offered for program participants to better use commodity products, either through individual one-page recipes, cookbooks, or newsletters. Generally, recipes incorporated specific commodity food items (although not always) but provided no nutrition information. Most of these recipes were compiled from multiple sources by FDPIR staff. Assistance from local Agriculture Extension staff, IHS staff, or State agency staff was reported by only four programs.

Some of these materials were innovative. One program provided individual recipes with easy to follow pictures for illiterate or non-English speaking participants. Another program developed a cookbook based on recipes contributed by program participants. A third program contributed to a tribal newsletter that contained articles on good nutrition, diet and health, with recipes which complemented the text.

Fourteen programs reported providing some form of general food and nutrition information not pertaining exclusively to American Indians or FDPIR participants. The majority of this information was in the form of pamphlets or small booklets by USDA, such as "Building a Better Diet" (Program Aid Number 1241), "How Do You Find the Best Meat Buys?", and "Which Brand Is the Best to Buy?"¹⁰

¹⁰USDA also offers FDPIR staff access to the services of the Food and Nutrition Information Center (FNIC), part of the National Agricultural Library. FDPIR staff may use FNIC reference services and receive photocopies of journal articles without cost. FNIC staff nutritionists are available to locate specific facts, suggest organizations that can provide additional information, and conduct computerized literature

Pamphlets provided by IHS were reported to be used by three programs and several reported other sources, such as commodity promotion associations, or health-related associations like the American Diabetes Association. While the presentational quality of most of these reading materials was high, the appropriateness depended partly on the topic's particular relevance to program participants, and more importantly, on participants' ability to read, understand and translate this information into meaningful behavioral change.

Usual Sources of Nutrition Education. During focus group discussions, participants reported that their usual sources of nutrition information were: family members most often, then health professionals, followed by magazines, newspapers and television, and finally, the commodity program. Recipes were reported to be used by most participants in all three FDPIR focus groups. Magazines were reported to be the most common source of recipes, with family, friends and FDPIR reported as secondary but significant sources.

As is the case with any segment of the general population, focus group participants were subject to misinformation and misconceptions about food and nutrition. This was apparent in some of the comments offered during the focus group sessions. For example, in one group, diabetes was described as resulting from too much sugar and fat in the diet. Although obesity was identified as a separate nutrition-related health problem, it was not linked to diabetes, nor was losing weight considered an appropriate means of improving the diabetic condition.¹¹

Optimal Nutrition Education Services. A number of nutrition and health education texts and professional associations have defined optimal nutrition education. For example, in a classic text, *Nutrition and Diet Therapy* by S. R. Williams, components of a successful nutrition education program were described. These included: developing a knowledge of the target population; understanding the reasons for sustained food habits; identifying customs which may need to be changed; meeting individual dietary, social

searches.

¹¹As we discuss in Chapter III, diabetes occurs at very high rates among American Indians, and the overwhelming majority is classified as Type II diabetes. This form of diabetes occurs among genetically susceptible adults and is greatly aggravated by obesity.

and emotional needs; encouraging self-knowledge; involving key family and community leaders, including the household "gatekeeper" of food; developing effective communication skills; and evaluating results.

Applying the principles listed above to the context of a food assistance program, activities that would optimize the impact of nutrition education include:

- identifying potential nutrition-related health problems;
- providing relevant nutrition information to the target population;
- developing and implementing effective programs to assist in modifying food and nutrition behavior; and
- promoting changes within the family and community to support improved health and nutrition behavior.

This latter point is particularly important within the American Indian culture, which is distinguished by the many social ties held among tribal members and strong group cohesion, both within the family and the community. Finally, using nutrition education activities as a means of program outreach may also serve broader programmatic purposes.

Summary. 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. This is of special concern among American Indians because of high levels of diabetes, hypertension, obesity, and other nutrition-related health problems. Also, in order to ensure effective use of FDPIR food items, misinformation and misconceptions about food and nutrition among program participants should be identified and corrected.

Currently, many program participants appear to have limited access to information and education services to develop needed nutrition and health-related skills. Approximately one-fourth of the programs had no nutrition education budget, and only two actually employed nutritionists. In about three-fourths of the programs, staff with little or no training in nutrition distributed one-page nutrition informa-

tion fliers or sponsored group food preparation demonstrations. Staff in as many as half of the sample programs also distributed cookbooks, and about one-fourth of the programs contributed to a newsletter that contained food and nutrition information. Almost one-half of the programs distributed other general food and nutrition information through fact sheets, pamphlets, posters, and videos. However, many programs were unable to maintain a supply of these materials, thus limiting the effectiveness of their nutrition education efforts.

Assessing Food Preferences. The Commodity Distribution Reform Act and WIC Amendments of 1987 (Public Law 100-237) require that FNS periodically assess the acceptability of commodities to the program participants who receive them. Consistent with this mandate, FNS developed a survey instrument for FDPIR agencies to use in ascertaining food preferences among participating households. In turn, FNS surveys program administrators to obtain a report on the acceptability of commodities.¹²

Our survey of program operations indicated that approximately three-fourths (73.3 percent) of the sample programs conducted some type of survey of food preferences in FY1989. Approximately two-thirds of these programs asked all participating households to complete a questionnaire, with varying rates of response (response rates are not available). The remaining programs relied on nonprobability samples ranging from 10-50 percent of their caseload. In some of these cases, forms simply were left out at distribution sites for participants to fill out as they chose, more along the lines of a complaint mechanism. However, most of the program directors interviewed for the study felt that informal feedback and "take rates" (the relative rate at which participants requested particular items in making selections each month) were at least as helpful as the information they obtained through participant surveys.

Based on their experience, most program directors identified certain items that their clients clearly preferred or disliked. Preferences for particular items varied across programs and regions, with some directors saying that a particular item was not widely liked while others reported that it was a favorite. For example, some directors reported that they never ordered blackeyed peas, whereas others tried to ensure that they had them in stock each month. Again,

¹²A summary of findings from such a survey is provided in a report by the Food Distribution Division, FNS, Food Distribution Program on Indian Reservations Commodity Acceptability Survey Analysis, November 1988.

**Commodity
Distribution**

because directors tend to base food orders on their understanding of participants' stated preferences, an item such as blackeyed peas might not be available in some programs, whereas some directors would make it a priority to ensure its availability.

There are four distinct stages in the commodity distribution process. These stages include:

- the ordering of commodities by States and ITOS;
- the acquisition and distribution of commodities to States and ITOS by USDA;
- the storage of commodities received from USDA by States and ITOS; and
- the distribution of commodities each month to households certified to receive them.

We describe each of these four stages below, followed by a discussion of the effectiveness of the commodity distribution process.

Ordering Commodities. The program directors interviewed for this study generally reported that recent distribution trends ("take rates") and inventory levels usually provide the basis for ordering commodities from USDA and maintaining a sufficient stock to meet the needs of local participants. These trends are affected by the level of participation in recent months, the commodities being offered by USDA, and local program directors' (or other staff) perception of food preferences.

Orders also must be consistent with Federal requirements that each household be offered a certain amount of food from each of several food groups within the FDPIR package. Additionally, FNS recommends that programs maintain an inventory that would be sufficient to meet the demand for food for three months. Therefore, when program directors submit their orders, FNS Regional officials review them to ensure that each program has the desired three-month supply (but not more than a six-month supply).

Acquisition of Commodities by FNS. The availability of specific food items to FDPIR participants also depends on USDA's ability to fill orders submitted by local programs. After receiving and reviewing these orders, staff in all of the Regional Offices except the West refer the orders to FNS headquarters. FNS reviews and approves the orders, and transmits them to a contractor who operates the USDA

warehouse in Kansas City, Kansas, which handles about two-thirds of all the food shipped to FDPIR programs. Officials in the Western Region submit orders directly to the contractor in Kansas, who then routes trucks directly from processors to larger programs in the West and from warehouses in Exeter, California, and Kent, Washington.

The Agricultural Stabilization and Conservation Service (ASCS) and the Agricultural Marketing Service (AMS) of USDA are responsible for procuring commodities that are stored at these central warehouses. ASCS obtains dairy products, grains, oils, and honey, whereas AMS obtains meats, fruits, vegetables, and corn syrup. These agencies must contend with droughts and other weather conditions that affect the general market, as well as competition from the commercial sector in obtaining food at a reasonable price.

Food orders must be received at the USDA warehouse one month prior to shipment to allow time for loading. The guidelines used by the warehouse contractor call for each order to contain at least 30,000 to 36,000 pounds, approximately the minimal net weight for one truckload. As a result, filling the orders of small FDPIR programs can be problematic because their orders are often smaller than normal production contract volumes and special efforts must be made to assemble and ship such orders.

Given the guidelines followed by the warehouse contractor, some small programs only receive two or three shipments a year. Therefore, unless they have the capacity to store four to six months' inventory, these programs may experience shortages. Such shortages can reduce the nutritional balance of the packages issued to participating households, and if related to ingredients for particular recipes, make it difficult for participants to use effectively the commodities that are available.

To address this potential problem, some smaller programs have contracted with larger programs to order and store commodities. Similarly, the programs operated by ITOs in State-administered systems can rely on large State-owned central warehouses and not be forced to rely exclusively on the relatively small warehouses located on their reservations. However, this introduces another administrative level in the commodity acquisition process, and may result in a reduced sense of control for those program directors who experience shortages or delays in shipments at that level or at the Federal level.

Storage of Commodities by States and ITOs. Each program must have space to store the commodities it receives from USDA to distribute to FDPIR participants. In the program operations survey, we compiled basic information about the storage capacity of each of the 30 sample programs and also developed additional measures of storage space relative to each program's caseload. First, using data from the FNS Form-152 for July 1989, we determined the number of each food item in inventory and divided it by the number of participating households. We then took the average of this figure across all items in stock. This produced a relative measure of inventory volume per participant household that could be compared across different size programs. We then performed a similar series of calculations for the items issued in that month. Together, they represent the total volume of food issued or in storage per household in July 1989. A summary of findings is presented in Exhibit II.8.

Exhibit II.8

Commodity Storage and Distribution Characteristics by Size of Program

| CHARACTERISTIC | Program Size Category (Number of Sample Programs) | | |
|--------------------------------------|--|----------------|--------------|
| | Small (15) | Medium (10) | Large (5) |
| STORAGE CAPACITY (SQ. FT.) | | | |
| Warehouse | 3,546 | 5,222 | 18,932 |
| Refrigerated Space | 102 | 359 | 842 |
| Total Storage Space per Household | 21 | 14 | 10 |
| ITEM INVENTORY PER HOUSEHOLD* | | | |
| Mean | 3.8 | 5.4 | 4.3 |
| Standard Deviation | 5.0 | 8.2 | 6.5 |
| ITEM ISSUED PER HOUSEHOLD* | | | |
| Mean | 1.6 | 1.7 | 1.8 |
| Standard Deviation | 2.4 | 2.4 | 3.0 |

*The measure of inventory per household is the average across all food items of the average number of units of each item in stock divided by the number of participating households. Similarly, the number of items issued per household is the average across all food items of the average number of units of each item divided by the number of participating households.

Storage capacity appears to be inversely related to the size of programs on the basis of the storage space per household reported above. However, data concerning the size of inventory (measured as the mean number of units in inventory per household for each item in inventory) do not support the conclusion that storage capacity implies larger inventories. In fact, the small programs had the lowest inventory level based on this indicator. This is consistent with the point discussed above that these programs tend to receive fewer shipments because of the minimum size of shipments permitted from USDA warehouses.

The last set of measures in Exhibit II.8 suggest that large programs issued households a larger amount of any given food item. The differences are quite small and subject to measurement error. However, one plausible reason for variation in this measure is that households receive more of a particular item in a food group to compensate for the lack of selections within that group. For example, if only four vegetables were available rather than the full range, participants might be offered and accept more of the available items. While this would not necessarily compromise the nutritional balance of the package, it would result in less variety, and potentially, a lower level of participant satisfaction.

Distribution of Commodities to Households. The amount and variety of food issued to participants could be related to the methods a program uses to distribute food as well as to storage capacity. We observed two different distribution systems—tailgate (a truck travels to distribution points away from the warehouse to meet participants) and manual (pickup at a central warehouse). There is some variation in the operation of warehouse distribution sites in that some are "self-service" (participants use shopping carts to select items), whereas FDPIR staff retrieve items for participants in others. Also, some programs do not use one system exclusively, but distribute according to special needs (for example, having nearby participants come to the warehouse, but providing tailgate service to persons living in remote areas).

What is most important with regard to this aspect of program operations is each program's effort to enhance accessibility by minimizing the need for FDPIR participants to travel long distances to apply for and receive commodities. Also, the certification process is affected by the distribution system in that applications and recertifications are routinely processed at tailgate distribution sites.

Exhibit II.9

Distribution Methods by Program Size

| Distribution Method | Program Size Category (Number of Sample Programs) | | | Total (30) |
|-----------------------------|--|----------------|--------------|---------------|
| | Small (15) | Medium (10) | Large (5) | |
| Tailgate and Warehouse | 5 | 6 | 5 | 16 |
| Warehouse and Home Delivery | 8 | 2 | -- | 10 |
| Warehouse Only | 2 | 2 | -- | 4 |

As shown in Exhibit II.9, among all the programs in the study sample, slightly more than half issued food both from a warehouse and by tailgate. One-third issued food primarily at a warehouse, but also made deliveries directly to the homes of households with elderly and disabled members. Only four programs issued food exclusively from a warehouse. It is apparent, therefore, that most programs attempt to make the program more accessible by offering tailgate distribution or home delivery.

The distribution method used in a program appears to be related to the size of the program. All five large programs distributed foods from warehouses and via tailgate. In three of these programs, however, a large majority of households were served at tailgate sites rather than at warehouses. Six of the ten medium-sized programs issued commodities from a warehouse and by tailgate. The remaining four programs in this size group issued primarily from a warehouse, but two of them also made special home deliveries. Among the small programs in the study sample, two-thirds (10) distributed primarily from a warehouse. However, all but two of these programs also provided home delivery. The other five small programs distributed from a warehouse and by tailgate.

This pattern of distribution methods across programs of different sizes seems to be consistent with the findings reported in Exhibit II.9. Specifically, smaller programs tend to distribute from warehouses (or prepare packages for home delivery) rather than by

tailgate and, therefore, are likely to be able to offer a full selection of items each month. Large and medium-sized programs, in contrast, tend to rely more on tailgate distribution. Many of the directors of these programs reported that the limited space on their trucks forced them to restrict selections within food groups available to households in any given month. As a result, only over a cycle of two or three months were they able to offer households an opportunity to obtain every item in the FDPIR package.

We discuss the distance participants must travel to commodity distribution points in the next chapter. However, it is helpful to know at this point that FDPIR participants in small programs reported traveling shorter distances (a mean of 11.5 miles) than sample participants in larger and medium-sized programs (means of 13 and 13.8 miles respectively). Also, these differences in travel distance between participants in small programs and those in large and medium-sized programs are understated. This is because, except for three small programs in which participants had to travel more than 20 miles on average, participants in small programs tended to travel much less than the average of 11.5 miles. In fact, the distance to the commodity distribution point in seven of the 15 small programs averaged five miles or less.

The more widespread use of warehouse distribution among small programs seems appropriate in light of the shorter trips many participants in these programs reported making. Given that large and medium-sized programs tend to rely on the tailgate method, the distances participants in those programs travel are likely to be less than if they had to travel to the warehouse. Based on our visits to 21 of the programs, including visits to tailgate sites, this conclusion seems reasonable.

Availability of Commodity Foods. The extent to which households actually have access to the full range of items comprising the FDPIR package serves as a useful test of the effectiveness of the FDPIR commodity distribution process. This access includes both a variety of items within a food group as well as across the full range of FDPIR food groups.

We addressed this issue in the household survey by asking respondents (participants in September 1989) whether each of the approximately 70 items in the FDPIR food package had been available at any time during a three month period (September and the two preceding months). Using data from the household survey, we first examined the percentage of households in the full sample that

reported whether a given item had been available. We then compared this percentage with the percentages reported in each region, noting when a difference was at least five percentage points higher or lower than the proportion for the entire sample.¹³ For example, among the entire sample of households, 93.7 percent reported beef had been available in the previous three months. However, a regional breakdown showed that 98.9 percent of the sample households in the Midwest had it available, but only 83.5 percent of the households in the West (results for the other regions ranged from 94.7 to 98.5 percent).

Exhibit II.10

Patterns of Availability for Food Items by Region

| Region | Number of Items Not Available During 3-Month Survey Period for Significant Number of Households* |
|---------------------|--|
| Mountain Plains | 9 |
| Southwest | 8 |
| West | 31 |
| Midwest | 11 |
| Northeast/Southeast | 16 |

*Number of food items which households in each region reported as unavailable, given that the percentage reporting each item was at least five percentage points lower than the total combined percentage of the sample.

Exhibit II.10 summarizes the regional comparisons of food availability. The data pertaining to the Western Region stand out in the table. For example, a significant number of households in the West reported that they had not been able to obtain 31 items out of

¹³Although the standard errors of proportions estimated for the availability of each item vary, five percentage points represents approximately two standard errors in most cases. This reduces the possibility that the differences discussed here are attributable simply to sampling error.

approximately 70 items in the three months preceding the survey (the survey was conducted primarily during October and November 1989). There were only five items (pumpkin, turkey, spaghetti, bread flour, and nonfat dry milk) that were more available to them than persons in other regions. A check of FNS-152 data for July 1989 supported these reports, revealing an absence of inventory for many of the same items reported as unavailable in the survey. The large number of unavailable items in the Western Region suggests that such unavailability is not explained simply by regional differences in food preferences, or by nationwide shortages in food items.

There are several possible sources of this problem in the distribution of FDPIR commodities. First, it may be related to the fact that programs in the Western Region follow different ordering procedures that can cause delays in shipments. Second, it may be an unintended consequence of local programs' effort to enhance the accessibility of the program by using tailgate distribution systems.

**Program
Integrity**

Program monitoring encompasses a broad set of activities intended to maintain the integrity of the program. They include efforts by local programs to:

- verify information provided by applicants;
- prevent households from receiving food stamps and FDPIR commodities simultaneously (dual participation);
- pursue claims against participants who should not have received commodities; and
- maintain appropriate commodity inventory controls.

The integrity of FDPIR also depends on effective program monitoring and oversight of local operations by staff in FNS Regional and Field Offices, and in State agencies in State-administered programs. Essentially, their responsibility is to ensure that local programs operate in conformance with Federal regulations.

Verification Methods. Basing eligibility determinations on accurate information prevents incorrect awards of commodities and maintains the integrity of the program. In this section, we report the responses to a series of questions we posed to FDPIR staff in the survey of program operations concerning methods they employed in verifying reported household circumstances.

Federal regulations require that the income of all FDPIR applicants be verified prior to certifying their households to participate.¹⁴ In addition, program officials may require documentation of any information provided by applicants that is deemed questionable. This applies specifically to household composition and financial assets. While less stringent than requirements in the Food Stamp Program and other assistance programs, these regulations allow local officials the discretion to require full documentation of circumstances prior to making a final determination of eligibility.

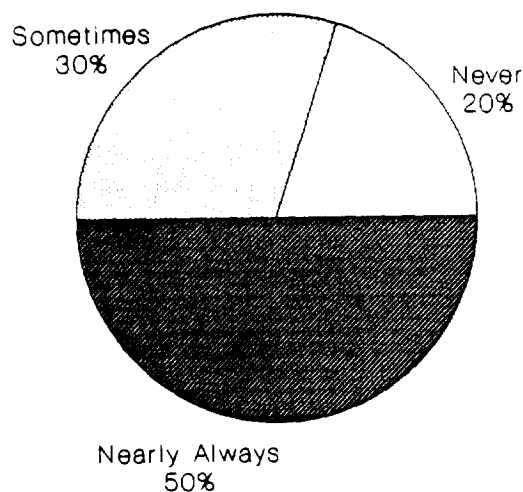
The first step in the eligibility determination process is to verify that a household's financial assets are within the limits established by Federal regulations (\$3,000 for households with an elderly member and \$1,750 for all others). As shown in Exhibit II.11, staff in half of the sample programs indicated that they nearly always accepted the applicant's statement of assets and did not attempt to verify them ("nearly always" refers to 90 percent or more of the applications they processed). In contrast, one out of five programs never took the applicant's word and made some effort to confirm the report (for example, asking the applicant to provide a letter from the local bank confirming that they did not have an account with a value in excess of the resource limit).

There do not appear to be major differences among small, medium, and large programs in terms of the tendency of certification specialists to require documentation of assets. However, the staff in large programs seem to follow a slightly different pattern than their counterparts in small and medium-sized programs in the verification of earned income. As shown in Exhibit II.12, they tended to rely on formal communications (such as letters from employers) rather than seeing a check stub or calling the employer. They also were more likely to request a copy of an actual paycheck from applicants. Such verification methods may be another indication that staff in larger programs are not as familiar with individual applicants' circumstances, and therefore, must request more in-depth documentation of information reported on the application.

As shown in Exhibit II.13, copies of checks from public assistance agencies, the Social Security Administration, pension funds, and other sources of income not related to current employment were the primary means used by certification specialists to verify this type of

¹⁴As we discussed earlier in the chapter, regulations do permit households to be certified for one month pending receipt of information that documents their circumstances, including income.

Exhibit II.11
Accept Applicant's Statement of
Amount of Household Assets



income. Award letters were the next most common form of verification. A few programs matched their records (manually or by checking computerized records) with other agencies (especially tribal records) to identify sources of income. Most important to note, however, is that income, unlike financial assets, was routinely verified, as required by Federal regulations.

Identifying Dual Participation. Officials in 22 of the 30 sample programs we interviewed received a monthly listing of food stamp households from nearby welfare offices. In these programs, certification specialists reported that they routinely checked this listing, or called if they felt the listing was not up to date, to ensure that FDPIR applicants were not currently receiving food stamps. In the remaining eight programs (these were typically in the smaller programs), staff made a telephone call about every applicant to the local food stamp office. Also, rather than exchange listings, FDPIR and food stamp officials in four agencies sent interagency notices of

Exhibit II.12
 Methods Used to Verify Earnings of
 FDPIR Households

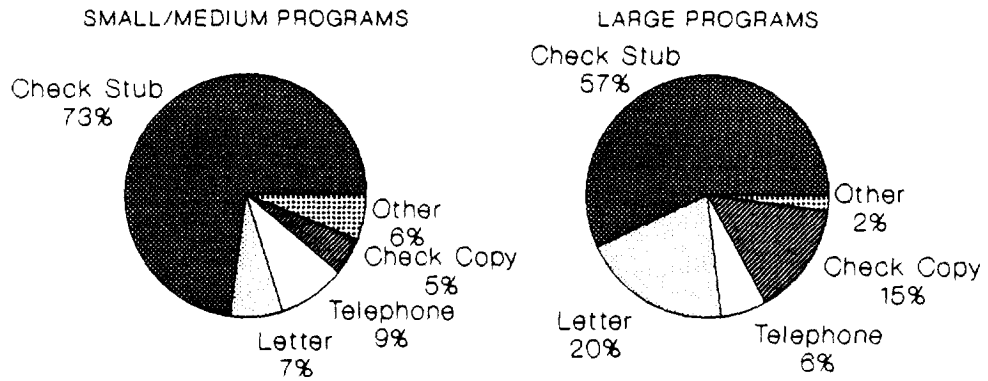
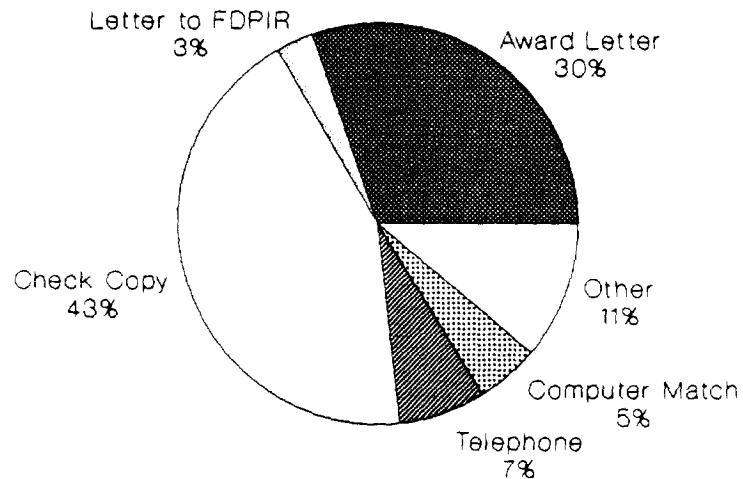


Exhibit II.13
 Methods Used to Verify Unearned
 Income of FDPIR Households



case actions related to households that were applying for or terminating participation in one program or the other.

Claims Against Households and Disqualifications. When local FDPIR officials determine that a household has received commodities to which it was not entitled, they must attempt to obtain compensation from that household. The following circumstances could result in an overissuance and lead an agency to make a claim against a household:

- incorrect or incomplete information on an application;
- failure to report changes in circumstance that affect basic eligibility; or
- dual participation in the Food Stamp Program and FDPIR.

The amount of the compensation is the estimated cash value of commodities issued in error to the household (the estimates are based on values FNS provides for each commodity).

Sixteen of the 30 programs in the sample filed claims against households in FY1989. Twelve small and medium-sized programs filed 38 claims totaling \$8,940. Four large programs filed 71 claims totalling \$19,111. The average size of a single filed claim was \$257 for all programs. (Precise data on the full range of filed claims sizes are not available, since only composite figures were reported by programs.) The small programs received a grand total of \$661 in repayments of claims. Among the four large programs, only one reported receiving "about \$100 per month". Consistent with these figures, most program directors reported that it was extremely difficult to obtain repayments.

Households that fail to repay the claims made against them may be disqualified from participating in FDPIR. Program directors have some discretion in deciding when to disqualify a household. Some directors told us that many households were financially unable to make repayments, and as a result, they were not inclined to disqualify such households, particularly if the household did not appear to have fraudulent intent. This attitude is consistent with operating guidelines in FNS Handbook 501 (p. 5-21) that permit directors to waive disqualification if it would "cause undue hardship to the household." The directors of 14 programs, including five that did not report filing any claims, indicated that they had disqualified certain households from participating during FY1989. Only one

household was disqualified in each of nine programs. The number in the remaining five programs ranged from two to 17.

Inventory Controls. The integrity of a local FDPIR program also could be undermined if commodities were diverted to inappropriate uses by persons other than program participants. To avoid such problems, each program must monitor its warehouse stock, the flow of commodities into it from USDA, and the flow out to FDPIR households. This is accomplished through two types of inventories--a physical inventory (usually taken at the end of each month) and a perpetual inventory. Whereas the physical inventory involves an actual count of items, the perpetual inventory books the distribution of commodities to FDPIR households, damages to goods, and the use of a small amount of commodities for special purposes (e.g., nutrition education demonstrations).

The FNS Form-152 includes the results of a comparison between the physical inventory for a given month and the inventory indicated by records in the perpetual inventory. Two types of discrepancies can arise. First, the physical inventory may reveal more units of stock than the perpetual inventory shows. This could happen, for example, when an issuance clerk undercounts the number of cans of peaches a household has requested and the household fails to detect the underissuance. The tally of household issuance records that is entered into the perpetual inventory would show more cans being issued than actually were received by the household.

The second type of discrepancy occurs when the count from the physical inventory shows fewer units of stock than are indicated by the perpetual inventory. Such a problem could arise, for example, if a can or case of food item were misplaced at a tailgate site and was not put back on the truck and returned to the warehouse. Whereas the first type of discrepancy reveals an unexplained surplus of stock, the second reveals a shortage.

The two types of discrepancies indicate different kinds of operational problems, but both are important and must be controlled. Therefore, for the purpose of our analysis, we simply counted the number of discrepancies that were found in the July 1989 physical and perpetual inventories for each sample program, regardless of type. We then computed two measures to describe the rate of discrepancies. One measure is the mean number of discrepancies per item across all items in inventory during July 1989. As Exhibit II.14 shows, it is an absolute measure that increases with program size. Therefore, to obtain a measure that could be compared across

programs of different sizes, we computed a second measure. It was produced by dividing the first measure by the number of items issued and in inventory in July. In order to avoid reporting extremely small numbers, we report discrepancies per 1,000 units of inventory.

Exhibit II.14

Inventory Discrepancies by Size of Program

| DISCREPANCY MEASURE | Program Size Category (Number of Sample Programs) | | |
|---|--|----------------|--------------|
| | Small (15) | Medium (10) | Large (5) |
| MEAN INVENTORY DISCREPANCIES PER ITEM | | | |
| Mean | 1.9 | 12.3 | 20.2 |
| Standard Deviation | 2.8 | 59.8 | 25.3 |
| Coefficient of Variation | 1.4 | 4.9 | 1.3 |
| INVENTORY DISCREPANCIES AS A PROPORTION OF VOLUME, PER 1,000 UNITS | | | |
| Mean | 2.0 | 2.0 | 1.6 |
| Standard Deviation | 2.3 | 5.0 | 1.9 |
| Coefficient of Variation | 1.2 | 2.5 | 1.2 |

The data reported in Exhibit II.14 suggest that the magnitude of such discrepancies remained small across programs of all sizes. The greatest number of inventory discrepancies occurred in the larger programs. This discrepancy among the largest programs is to be expected given the volume of material that flowed through these facilities. However, when we examined these discrepancies in relative terms of a proportion of the volume of commodities issued and in inventory, the larger programs appear to have exercised more effective control over inventory. There were no differences between small and medium-sized programs. However, the larger coefficient of variation among medium-sized programs indicates that there was greater variability among this group, with some maintain-

ing much better control than the average and some much worse control.¹⁵

In an effort to automate this process, FNS is supporting the development of inventory control software through the Southwest Regional office and providing matching funds for local programs to purchase computer equipment. Four of the five large programs have access to microcomputers, and 11 of the remaining 25 sample programs either own a microcomputer or have access to one owned by the tribe. Therefore, there is a fairly high degree of computerization among local programs. Our contacts with FDPIR staff who rely on computers to maintain the perpetual inventory indicated that this relieves them of a time-consuming and tedious responsibility. Local FDPIR staff involved in the study also reported that microcomputer spreadsheet models developed by FNS Regional Office staff to support commodity ordering made that process much easier for them.

Program Oversight. A final area related to program monitoring concerns oversight of local FDPIR programs by FNS and State officials. A considerable degree of oversight is exercised via reports submitted by local programs. One of the most important is the FNS Form 152 which, as described above, summarizes inventory and issuances on a monthly basis, as well as inventory discrepancies. State and FNS Regional staff also review and approve each program's food orders. Finally, and perhaps most importantly, each program must submit an annual plan of operation and budget that follow a standard format developed by FNS.

In addition to monitoring reports from local programs, FNS Regional Office staff, working in cooperation with State personnel in State-administered programs, often visit local programs to determine if they are being operated efficiently and in a manner that ensures the integrity of the program. While the oversight function differs according to the administrative structure of each program, all programs are subject to Management Evaluation (ME) reviews. In addition, each program operated by an ITO in a State-sponsored program is subject to regular oversight by the staff of the State

¹⁵The coefficient of variation (CV) within each group provides a standardized measure of the degree of variability within each size group. It is computed by dividing the standard deviation by the mean. The CVs among large, medium and small programs are 1.2, 2.5, and 1.2, respectively. This indicates that there is twice as much variation about the mean level of discrepancies for medium-sized programs as there is among other size programs. Therefore, the mean is not as reliable a measure of the typical discrepancy level for this group of sample programs.

agency responsible for the program. Variation exists, therefore, in who performs the oversight function, how many different agencies are involved, and what type of feedback on performance is provided to local programs. Depending on how the oversight function is carried out, local FDPIR officials may feel a weaker or stronger sense of accountability for how they operate their program.

Over two-thirds of the sample programs (21) reported that they were visited by an FNS staff person during FY1989. Four programs that were not visited by FNS in FY1989 involved programs in State-administered systems, and they were visited by staff from the agency of State government that was responsible for oversight. A total of 17 programs indicated that an ME review had been conducted in FY1989, and most of the sample programs had been reviewed within the past two years.

The content of the ME reviews we examined varied widely, partly due to the idiosyncratic nature of the problems revealed by the reviews, and partly due to the manner in which different reviews had been conducted. Some offered brief and uniformly positive appraisals of program operations, while others meticulously reviewed every aspect of program operations and offered suggestions for improving most of them. Given the different approaches taken in the reviews and the lack of a recent review for nearly half the sample programs, it is not possible to offer a systematic summary of review results.¹⁶

¹⁶While FNS Handbook 501 describes the range of issues to be covered in ME reviews, most State and Regional staff exercise wide discretion in conducting them. One exception is the Southwest Region, which has adopted a detailed topical outline/questionnaire that staff must follow in conducting the review. This degree of standardization is likely to produce findings that are comparable across programs in that Region.

D. CONCLUSIONS

Program Structure

One of the most important characteristics of local FDPIR programs is their small size. Half of them serve fewer than 250 households per month, and all but five of the remaining programs serve between 250 and 1,200 households per month. The staffing and administrative cost data presented in this chapter indicate that larger agencies are able to achieve significant economies of scale in serving program participants. Average administrative costs per household in FY1989 ranged from \$614 among small programs to \$287 among large programs. Similarly, the number of participant households per full-time equivalent (FTE) staff position was nearly 100 in large programs, compared to approximately 66 in small programs.

The flat-rate administrative cost standard established by FNS does not factor in these relative levels of efficiency. As a result, all of the programs whose administrative costs exceeded 30 percent of the value of distributed commodities in FY1989 served fewer than 250 households per month. This finding confirms that small programs do not benefit from the same administrative economies of scale experienced by larger programs.

In regions other than the West, half or more of the local programs do not meet the 25-percent administrative fund matching requirement. Among small and medium-sized programs in the study sample, nearly two-thirds of the cash value of the match was based on in-kind contributions, in most cases the reported market value of warehouse and office space. Therefore, while larger programs make relatively substantial cash contributions to support the operation of the program, many small and medium-sized programs depend almost entirely on Federal cash outlays.

Program Staffing

Staffing local FDPIR programs requires a limited range of staff positions in the areas of program administration and supervision, certification, 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 were two-person operations. Most staff averaged at least three years' experience in FDPIR, with certification specialists averaging 4.1 years and directors across the sample programs averaging 5.1 years.

The highest average salary for any FDPIR staff position in FY1989 was \$21,185 for program directors. Although staff in larger programs tended to be paid more than their counterparts in programs that served fewer participants, the generally low level of

salaries for these administrative positions seems to reflect the condition of labor markets in areas served by FDPIR.

**Recipient
Relations**

Most directors expressed the opinion that all potentially eligible households know about the available benefits and where to apply for them. As a result, with several specific exceptions, they focused outreach efforts on publicizing the distribution schedule each month. However, through efforts such as the operation of tailgate certification and distribution systems, and home delivery of commodities to elderly and disabled participants, they seek to make the program more accessible.

In most cases, local FDPIR programs do not restrict the availability of benefits only to tribal members. The clientele of most local programs includes non-Indians and Indians representing five or more tribes. Where tribal affiliation is used as an eligibility criterion, it is because a program is attempting to serve American Indians whose tribe does not have a reservation, and therefore, cannot use residency within a specified area as a qualifying factor.

Although program directors did not perceive any language barriers to exist for more than a small percentage of their clientele, all programs made provision for translators to be available (either a staff member or some other person).

The eligibility determination process in FDPIR is less demanding for applicants than it is in the Food Stamp Program and other assistance programs. More often than not, the certification specialist accepts the applicant's statement concerning financial resources, but in nearly all cases, they obtain documentation to verify the household's income. Approximately three out of four 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 on the application.

Federal regulations do not require local FDPIR programs to offer extensive nutrition education services to program participants, although the regulations do encourage programs to coordinate nutrition education services with other local programs. The 30 sample programs in this study allocated an average of five percent of the funds for administration to this function, with program support ranging from zero to almost 25 percent of their annual administrative budgets. Even though all FDPIR program directors identified nutrition-related problems as a special concern, over 25 percent of the programs reported no nutrition education budget.

Of the resources provided for nutrition education, most are dedicated to personnel expenditures and the development and dissemination of recipes or food demonstrations. Nutrition education personnel resources, with only two exceptions out of the 30 programs surveyed, are used to partially support program personnel whose primary responsibility is certification or some other program activity. These staff have little or no nutrition or health education training, and the focus of their activities tends to be on distributing commodity recipes and demonstrating how specific food items can be prepared.

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. In order to ensure effective use of FDPIR food items, misinformation and misconceptions about food and nutrition among program participants also should be identified and corrected.

Commodity Distribution

Local programs use a combination of three distribution methods in order to accommodate both recipient needs and local situations. About half of the programs in the study sample used the tailgate distribution method, and about a third delivered commodities directly to the homes of a relatively small number of elderly and disabled participants. Very few programs, primarily those serving small caseloads, rely solely on distribution from a central warehouse. This does not seem to impose a burden on participants in these programs because average distances to the warehouse tend to be relatively short. Also, by obtaining food directly from the warehouse (or through home delivery), a participant may be more likely to be able to select from the full range of items in inventory. Program directors reported that choices in any given month tend to be more restricted for participants who receive their food at tailgate sites due to limited space of trucks.

Survey reports indicate that significant variations exist across regions in terms of the availability of specific food items. For example, households in the Western Region are not able to select from as wide a range of items as households in other regions. This was confirmed by administrative reports describing the inventories of programs in that region. There are several possible sources of this problem. First, it may be related to the fact that programs in the Western Region follow different ordering procedures that cause

delays in shipments. Second, it may be an unintended consequence of local programs' effort to enhance the accessibility of the program by using tailgate distribution systems.

**Program
Integrity**

To maintain the integrity of FDPPIR operations, local programs have instituted controls related to the eligibility of participants. First, certification specialists routinely verify reported income. Second, all sample programs made some provision for identifying dual participation in FDPPIR and the Food Stamp Program, usually through an exchange of participation lists with local food stamp offices. Third, even though they received few repayments, more than half the sample programs had pursued claims against households that had received food for which they were not eligible.

Inventory controls are maintained by following perpetual and physical inventory procedures prescribed by FNS, sometimes using microcomputers and software provided by FNS. The rate of inventory discrepancies observed among the 30 sample programs suggests that large programs may be more effective in controlling this problem, and that medium-sized programs may be most susceptible to it. It could be the case that the size of medium-sized programs and the resources available to them result in their applying procedures similar to those used in small programs to circumstances that are more characteristic of large programs.

Finally, all but five of the 30 programs included in the study had been visited in FY1989 by either FNS or, in the case of programs supervised by an agency of State government, by State personnel. Most of the programs received a formal Management Evaluation (ME) review by FNS during the two years prior to the program operations survey. The findings of reviews that had been done varied widely, due partly to the range of problems they revealed and partly to different approaches State and Regional personnel followed in conducting the reviews.