



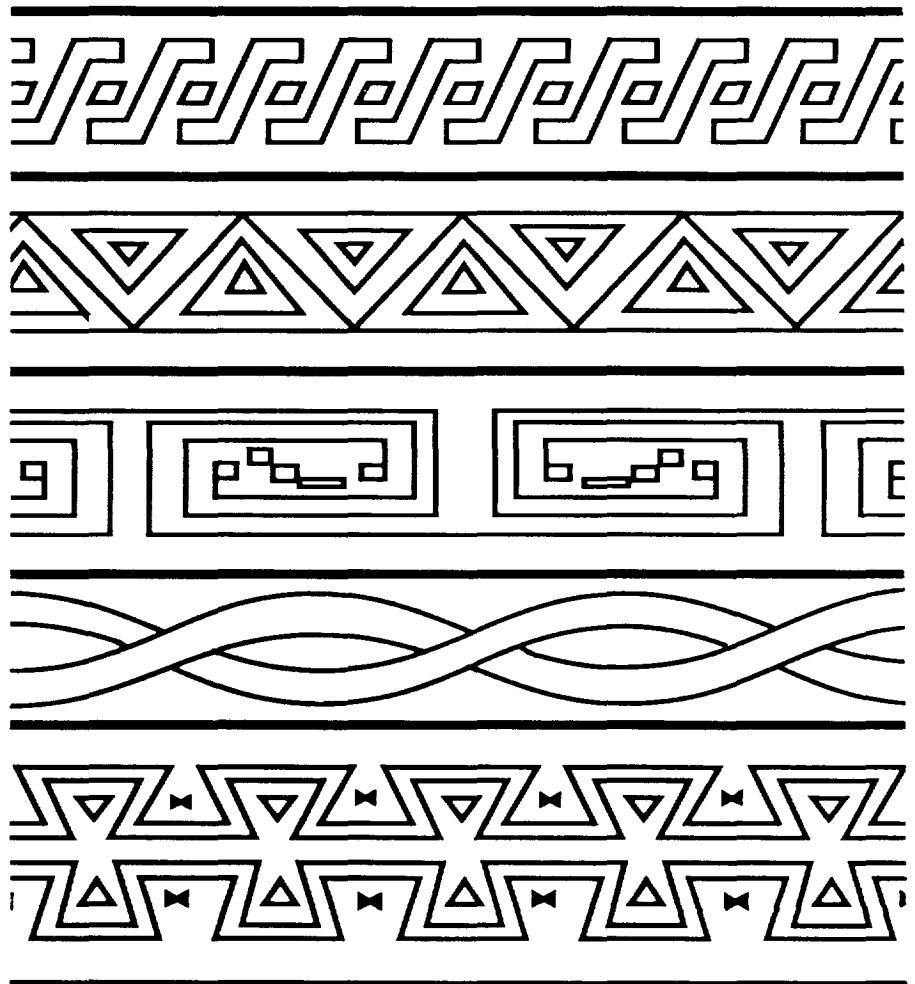
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Evaluation

Evaluation of the Food Distribution Program on Indian Reservations

Volume I: Final Report



**EVALUATION OF THE
FOOD DISTRIBUTION PROGRAM ON
INDIAN RESERVATIONS (FDPIR)**

**Volume I
Final Report**

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ABBREVIATIONS

AFDC	Aid to Families With Dependent Children
BIA	Bureau of Indian Affairs
FDPIR	Food Distribution Program on Indian Reservations
FNS	Food and Nutrition Service
FNSRO	Food and Nutrition Service Regional Office
FSP	Food Stamp Program
GAO	General Accounting Office
GA	General Assistance
IHS	Indian Health Service
ITO	Indian Tribal Organization
QC	Food Stamp Quality Control System
RDA	Recommended Dietary Allowance
SSI	Supplemental Security Income
TEFAP	Temporary Emergency Food Assistance Program
USDA	United States Department of Agriculture
VA	Veterans Administration
WIC	Special Supplemental Food Program for Women, Infants and Children

Executive Summary

EVALUATION OF THE FOOD DISTRIBUTION PROGRAM ON INDIAN RESERVATIONS

A. OVERVIEW

The Food Distribution Program on Indian Reservations (FDPIR) provides supplemental foods to low-income households living on or near Indian reservations. While recognizing a need for assistance among American Indians, Congress was concerned that this need may not be adequately addressed by the Food Stamp Program, the largest and most widely available food assistance program in the United States. The primary concern was that the remote location of many reservations may make it difficult for many American Indians to participate in the Food Stamp Program because they live some distance from a food stamp office and food stores are scarce or far away.¹ Thus, FDPIR represents an alternative to the Food Stamp Program for residents of Indian reservations.

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

Program Background

Household Eligibility and Benefits. To be eligible to receive a commodity package, a household must meet the income eligibility criteria established by Federal legislation, and either reside on an Indian reservation or be a tribal member who resides in the designated service area of a FDPIR program. The income limits used to determine FDPIR eligibility are the same as Food Stamp Program net monthly income limits plus the standard deduction used in determining eligibility for that program. However, FDPIR differs from the Food Stamp Program in that the amount of food an income-eligible household receives is based solely on the number of members it contains, regardless of the specific level of income it has.

¹The legislative history leading to the establishment of FDPIR may be found in House Report 95-464, 95th Congress, 1st Session, June 24, 1977 and Senate Report 95-180, 95th Congress, 1st Session, May 19, 1977.

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

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

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

Objectives of the Evaluation

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

Program Operations:

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

Participant Characteristics:

- describe the demographic and socioeconomic characteristics of FDPIR households; and
- identify dietary needs and preferences of low-income Indians and examine ways in which FDPIR addresses them.

Comparison of the contributions of FDPIR and the Food Stamp Program in providing food assistance to American Indians:

- provide a preliminary comparison of the availability and acceptability of FDPIR commodities versus food stamps for American Indians; and
- explore the unique contributions each program makes in meeting the food assistance needs of this population.

Research Design and Methods

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

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

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

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

B. SUMMARY OF FINDINGS

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

Program Operations

Larger programs appear to achieve administrative economies of scale.

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

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

Local programs vary widely in the level and type of resources used to meet administrative matching-fund requirements.

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

Program staffing is not highly specialized in FDPIR, especially in small programs.

Generally, local FDPIR programs operate with a narrow range of staff functions in the areas of program administration and super-

vision, certification, storage and distribution, and nutrition education. In small programs, it is not uncommon for an individual to serve in all four areas. In fact, one out of five of the sample programs are two-person operations.

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

Local FDPIR programs use a variety of means to enhance the accessibility of the program for participants and potential applicants.

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

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

The certification process in FDPIR is less demanding for both applicants and certification specialists compared to the Food Stamp Program and some other assistance programs.

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

because regulations permit local programs to grant a one-month certification pending verification of information.

Nutrition education activities vary widely across programs.

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

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

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

Local programs use a combination of commodity distribution methods to meet recipient needs and local situations.

In an effort to reduce participants' difficulty in obtaining commodities, about half of the programs in the study sample use the tailgate distribution method in addition to central warehouse pickup. Another third of the programs also deliver commodities to the homes of a relatively small number of elderly and disabled participants. Very few programs, primarily those serving

small caseloads, rely solely on commodity distribution from a central warehouse location.

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

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

A variety of administrative controls are used to maintain program integrity.

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

Inventory controls are maintained by following inventory procedures prescribed by FNS. Sometimes programs use microcomputers and software provided by FNS. While rates of inventory

discrepancies are low across all programs, large programs are most effective in controlling inventory discrepancies.

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

**Profile of
Program
Participants**

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

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

Adult FDPIR participants have completed an average of ten years of education.

About half of FDPIR adults were working, were looking for work, or were laid off and looking for work.

FDPIR households are poor by any conventional standard.

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

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

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

Even though average distances to key destinations are not great, many FDPIR participants experience transportation difficulties.

Although there is some regional variation in travel distances, the nearest food store is usually within four to five miles of participants' homes, whereas fresh meat and vegetables require driving to a store four to eight miles away. Commodities usually could be obtained at a site located six to nine miles from the participant's home.

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

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

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

Dietary Needs of Program Participants

In addition to program commodities, FDPIR households rely upon food purchases, home food production, and other USDA programs to meet their dietary needs.

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

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

Nearly half of the FDPIR households reported participating in other food assistance programs, mostly in other USDA programs. About 70 percent of the households with school-aged children participated in the School Lunch Program and 44 percent of these households participated in the School Breakfast Program. Nearly one in six FDPIR households received benefits under the WIC Program, representing 52 percent of the households with a child aged five or less. Over one-fourth of all households with elderly participated in one or more senior citizen assistance programs.

Seven out of eight respondents report that their households had enough to eat during the survey reference month, while one out of eight say that they sometimes or often did not have enough to eat.

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

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

Most FDPIR households report adequate food preparation and storage facilities, with many of the households lacking basic facilities living in the West.

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

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

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

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

and obesity, these self-report rates fall below published estimates among American Indians.

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

Food Preferences of Program Participants

Program participants express strong positive preferences for almost all commodity food items.

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

Comparison of FDPIR and the Food Stamp Program

There are distinct differences in the household characteristics of FDPIR participants versus American Indian food stamp recipients.

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

Based on a small exploratory survey of American Indian households who participated in the Food Stamp Program in Septem-

ber 1989, a larger proportion of this group had received benefits for the previous twelve months, compared to FDPIR households interviewed for this study. This is consistent with the fact that AFDC households would tend to have longer spells of participation due to factors related to their need for assistance (specifically, deprivation of parental support), whereas households with earned income would experience shorter (though perhaps repeated) spells of participation.

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

Providing commodities through FDPIR appears to be less expensive than providing food stamps to households who would be eligible.

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

Travel distances are usually ten miles or less to FDPIR distribution sites, local food stamp offices and food stores.

Most participants travel ten miles or less to purchase food, or apply for commodities or food stamps. However, as many as one-fourth of the participants in some regions have to travel more than 20 miles each way. The distance most participants must travel to purchase food is not significantly greater than the distance to the commodity distribution point. Also, while the

distance to the local food stamp office is usually greater than the distance to the FDPIR distribution site, the difference is not great.

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

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

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

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

Chapter I

INTRODUCTION

The Food Distribution Program on Indian Reservations (FDPIR) provides supplemental foods to low-income households living on or near Indian reservations. In establishing this program, Congress was concerned that Indian food assistance needs could not be adequately addressed by the Food Stamp Program, the largest and most widely available food assistance program in the United States. The focus of concerns was that the remote location of many reservations may make it difficult for many American Indians to participate in the Food Stamp Program, either because of the distance to food stamp offices, or if certified to receive food stamps, the difficulty of using them due to the scarcity of food stores or the distance to them.¹ Thus, FDPIR represents an alternative to the Food Stamp Program for American Indian and other households living on reservations where access may be a problem.²

This report presents the first nationally representative profiles of FDPIR participant and program characteristics, and examines the extent to which the program is meeting food-assistance needs and preferences among this particular target population. This introductory chapter presents a brief historical perspective on the program, describes the specific objectives of the evaluation, and provides an overview of the remainder of the report.

A. HISTORICAL OVERVIEW

The Food Distribution Program on Indian Reservations is an outgrowth of the Needy Family Program, established in 1936 to distribute surplus commodity agricultural products to households in need of food assistance. As the geographic coverage of the Food Stamp Program expanded during the 1960s and early 1970s, participation in the Needy Family Program declined. However, in enacting the Food Stamp Act of 1977, Congress established FDPIR as a replacement for

¹The legislative history leading to the establishment of FDPIR may be found in House Report 95-464, 95th Congress, 1st Session, June 24, 1977 and Senate Report 95-180, 95th Congress, 1st Session, May 19, 1977.

²FDPIR serves *all* income-eligible households (both Indian and non-Indian) residing within participating reservations as well as Indian households living near these reservations. In Oklahoma, only tribal members may participate in FDPIR since there are not distinct reservation lands by which to define program eligibility.

the Needy Family Program, and authorized the United States Department of Agriculture (USDA) to purchase and distribute agricultural products to residents of Indian reservations in an effort to provide them "an opportunity to obtain a more nutritious diet." While the food package is not intended to be the sole source of food for participating households, the volume and variety of foods offered in it is supposed to represent "an acceptable alternative to Food Stamp Program benefits" for low-income persons living on or near Indian reservations.³

**Household
Eligibility
and Benefits**

To be eligible to receive a commodity package, a household must meet the income eligibility criteria established by federal regulation, and either reside on an Indian reservation or include an adult tribal member and reside in the designated service area of a FDPIR program. The income limits used to determine FDPIR eligibility are the same as Food Stamp Program net monthly income limits plus the standard deduction used in determining eligibility for that program. However, FDPIR differs from the Food Stamp Program in that the amount of food eligible households receive is determined solely by the number of members it contains.

The monthly food package consists of a variety of canned and packaged commodities in such categories as meats, fruits, vegetables, dairy products, grains, and cereals. The Food and Nutrition Service (FNS) pays for the full cost of this food, using some USDA surplus foods as well as foods purchased specifically for use in the program. Although supplemental in nature, the overall FDPIR food package provides adequate levels of most nutrients and food energy to participating households.

**Program
Expansion**

Since its inception in 1977, FDPIR has grown to 105 local programs serving approximately 138,000 persons each month in Fiscal Year 1989. The vast majority of programs are administered by Indian Tribal Organizations (ITOs) under direct agreements with the Food and Nutrition Service of USDA, although some operate under the supervision of an agency of State government. Program regulations call for States and ITOs to contribute resources to meet 25 percent of the administrative costs of State and local operations, unless there is compelling justification that this matching requirement cannot be met.

³See the discussion of issues preceding regulations proposed in the Federal Register, Vol. 43, No. 237, December 8, 1978.

Administrative Oversight

The Food and Nutrition Service oversees FDPIR program operations through its network of Regional, Field, and Satellite Offices. FNS also works with other USDA agencies to procure the commodities, process the orders of local programs, and arrange shipments of food to local FDPIR programs. Staff in FNS Regional Offices assess the capability of ITOs to administer FDPIR, review annual plans of operation and budget requests prepared by individual State agencies and ITOs, and provide technical assistance and managerial oversight to local FDPIR programs.

B. OBJECTIVES OF THE EVALUATION

The purpose of the evaluation is to provide information about FDPIR households and program operations that FNS can use to improve the efficiency of program operations and to enhance FDPIR's ability to meet the nutritional needs of low-income American Indians. It also seeks to respond to specific mandates from Congress and to expressions of interest in the program from individual members of Congress and others.

First, the Commodity Distribution Reform Act and the WIC Amendments of 1987 (Public Law 100-237) required FNS and agencies administering FDPIR to collect information about the acceptability and usefulness of the commodities to program participants. While program reporting requirements recently instituted by FNS fulfill this requirement, this report provides additional, nationally representative data on these issues.

Second, responses to regulations proposed by FNS in 1987 highlighted the need for more systematic information about local program operations and the characteristics of program participants. FNS had been careful not to impose a substantial reporting requirement on local programs in order to minimize their administrative burden. This policy limited the collection of descriptive program data to only those essential to FNS's oversight responsibilities.

Finally, in response to a request from several members of Congress, the General Accounting Office (GAO) recently conducted a review of FDPIR program operations and the need for food assistance on four reservations. GAO was asked to respond to three broad questions:

1. What governmental and nongovernmental efforts are being made to help fill nutritional needs of Indian households on the reservations?

2. Are the food packages distributed by FDPIR adequate in size and variety to meet the nutritional needs of Indians participating in the program? Are Indian food stamp recipients on the reservations provided with adequate nutrition?
3. What special nutritional needs of Indians are not addressed by the above food assistance programs?⁴

Recognizing the potential overlap in objectives between GAO's research and this study, an effort was made to avoid duplication of data collection efforts, and thereby, to minimize the burden on program participants and administrators by coordinating the two efforts. GAO restricted its study to four reservations and did not include a representative household survey, in order to more quickly respond to Congressional inquiries. GAO recognized that, in some areas, the present study would provide more broadly representative and detailed information. Finally, both studies were designed to be descriptive in nature, and as such, do not directly assess the impact of the program or the nutritional status of participants.

In light of these information needs, this evaluation is organized around three sets of research objectives, one of which primarily required program-level data, one which required household-level data, and a third which required a synthesis of both types of data. As outlined below, the specific objectives of the evaluation relate to three broader sets of issues:

Program operations:

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

Participant characteristics:

- describe the demographic and socioeconomic characteristics of FDPIR households; and

⁴GAO, Food Assistance Programs: Nutritional Adequacy of Primary Food Assistance Programs on Four Indian Reservations, GAO/RCED-89-177, September 1989, p. 1.

- identify dietary needs and preferences of low-income Indians and examine ways in which FDPIR addresses them.

Comparison of the contributions of FDPIR and the Food Stamp Program in providing food assistance to American Indians:

- provide a preliminary comparison of the availability and acceptability of FDPIR commodities versus food stamps for American Indians; and
- explore the unique contributions each program makes to meeting the food assistance needs of this population.

C. RESEARCH DESIGN

This evaluation is based on data that describe FDPIR operational and caseload characteristics at the level of individual programs, and on data that describe characteristics of American Indian households that participate in FDPIR or the Food Stamp Program. Data were obtained from extant data sources (such as plans of operation and FDPIR case records) and from interviews and discussions with both program participants and administrators.

Sources of Data

To support analyses related to the first set of objectives, we developed information about the structure and operation of FDPIR programs from a variety of sources, including:

- site visits to 21 programs;
- a series of telephone contacts and exchanges of information with 10 additional programs;
- a systematic review of Fiscal Year 1989 plans of operation for all 105 FDPIR programs and intensive reviews of Fiscal Year 1990 plans for the 30 programs selected for intensive review;
- review of the most recent Management Evaluation (ME) reviews by FNS Regional and Field Office staff for each of the 30 sample programs; and
- a compilation of data from statistical reports that local FDPIR programs routinely submit to FNS.

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

- a national probability sample of 827 FDPIR case records drawn from 30 programs (Case Record Abstraction Data);
- interviews completed with 757 of the participants whose case records were selected in the sample (FDPIR Household Survey);
- a purposive sample of 107 American Indian households who chose to participate in the Food Stamp Program rather than FDPIR (Food Stamp Household Survey); and
- a probability sample of American Indian households whose food stamp case was reviewed in the summer of 1986 under the Integrated Quality Control System operated by State food stamp agencies and FNS (Quality Control Data).

In addition to the data sources outlined above, we sought additional insights concerning the characteristics and perceptions of FDPIR and American Indian food stamp households through focus groups. Three groups of FDPIR household representatives were assembled for this purpose. Also, in an effort to get a clearer perspective on the differences between American Indian FDPIR households and American Indian food stamp participants, we convened two focus groups of American Indians who were participating in the Food Stamp Program.

Sampling Design and Methods

This evaluation employed a multistage stratified sample design that would provide representative data about both FDPIR programs and participants. The program-level analyses required a sample of FDPIR programs representative of all 105 local programs, while the household-level analyses needed a sample representative of the national FDPIR caseload in September 1989. To facilitate analyses on both levels, we first selected 30 local FDPIR programs with probabilities proportionate to the number of households participating in each program. The geographic spread of these sites is shown in the map of the United States, Exhibit I.1.

This first-stage sample of programs was explicitly stratified by size (large, medium and small) and implicitly stratified by FNS region. The five largest programs, representing approximately one-third of all participating households, were all included in the sample. A sample of 25 of the remaining 100 programs was then selected to

Exhibit I.1
Sample FDPIR Programs



represent small and medium-sized programs, with small programs serving an average of 250 households or less, and medium-sized programs serving 250-1,200 households in a typical month. Thus, sample sizes for the three program strata were: 5 large programs, 10 medium-sized programs and 15 small programs.

The second-stage selection of households was driven by the objective of creating a self-weighting sample to improve the precision of sample estimates. The number of sample cases allocated to each of the three strata was proportional to the number of participating households in the strata. As a result, all programs in the small or medium-sized strata had approximately the same fixed sample sizes of 12 and 35 respectively. In the large program stratum, it was necessary to vary the sample size for each program because of the great variation in program size. This approach minimizes the risk of over- or underrepresenting households of any given program-size group.

The final stage in drawing the sample FDPIR households involved the selection of individual households within each sample program. In larger programs with a geographically dispersed clientele, it was necessary to sample distribution routes or warehouse facilities prior to selecting a systematic sample of households using September 1989 participant lists provided by each program. In some cases, therefore, the sampling process involved three stages.

To compare American Indians who receive commodities from FDPIR with those who receive food stamps, we also conducted a small exploratory survey of 107 food stamp recipients on three reservations located in Arizona, Montana, and Wisconsin. Respondents in these surveys were randomly selected from listings provided by local food stamp offices. These reservations were among those that had been selected for the FDPIR evaluation.

**Data
Collection
Procedures**

The collection of program operations data involved two stages—a series of four preliminary site visits in which we obtained the information needed to assess the completeness and reliability of extant data concerning program operations, and full reviews of the 30 programs selected in the first stage of the study sample. These reviews included interviews with program staff and the examination of extant program data. Due to some overlap between the preliminary site visits and the study sample, a total of 20 programs in the final sample of 30 actually were visited. The survey of program operations among the other ten was conducted by telephone.

The FDPIR household-level data collection effort involved both case record abstractions and personal interviews. Record abstractions were completed for every household selected into the sample of FDPIR participants, resulting in 827 cases. The case record data were manually extracted directly from the FDPIR application forms used by the local programs.

Personal interviews were conducted with the FDPIR head of household or an authorized representative and completed for 757 cases. These interviews were conducted by field supervisors and interviewers trained and supervised by staff from the Research Triangle Institute (RTI). Whenever possible, RTI hired field supervisors and interviewers of American Indian descent. In order to minimize nonresponse rates, RTI implemented extensive preparatory activities prior to the FDPIR household interview:

- a lead letter from FNS was sent to each identified sample member;
- as often as possible, a "neutral" site was identified at which to conduct the interviews⁵; and
- a second introductory letter was sent to each sample member identifying the "neutral site" and offering to reimburse respondents for expenses incurred by being interviewed.

Perhaps because of these efforts no major data collection problems were encountered during the survey and an overall response rate of nearly 92 percent was achieved. As shown in Exhibit I.2, this rate was consistent among households representing each program-size group. Similar procedures in the surveys of food stamp households resulted in completed interviews with 107 of 110 sample households.

⁵During the pretest of the household survey instruments and procedures, a number of FDPIR officials recommended that we conduct the interviews with program participants at a familiar public place rather than their homes. Following their recommendation, we conducted about half the interviews in private areas at places such as ITO offices, libraries, and other public buildings. Local FDPIR offices were *not* used in any interviews.

Exhibit I.2

Sample Sizes by Size of Program

Size of Program	Number of Programs	Sample Households	Completed Interviews	Completion Rate
Large	5	298	273	91.6%
Medium	10	349	318	91.1%
Small	<u>15</u>	<u>180</u>	<u>166</u>	<u>92.2%</u>
Total	30	827	757	91.5%

**Analysis
Methods**

Analyses included in this study are largely descriptive in nature. That is, summary tabulations and means (and/or medians) are reported. Standard errors and confidence intervals also are estimated and reported as appropriate. Appendix B of Volume 2 provides a detailed discussion of sampling error and the design effects associated with statistical estimates made in the report.

In order to make accurate estimates for the entire FDPIR population, sample weights consistent with the survey design were applied to the data for each household whose case record was sampled or who participated in the survey. These methods enhance the efficiency of the study, both in terms of cost and statistical precision. This approach required the use of special analysis techniques to ensure that estimates for the total program population were reliable.⁶

The number of households studied in this evaluation was large enough to produce reliable statistics for the full sample and major subgroups such as households containing an elderly member. In some cases, however, it was not feasible to pursue potentially interesting lines of analysis because the sample (or a particular segment of it) was not large enough. Volume 2 provides further details concerning the design of the study, data collection procedures, and the magnitude of sampling error associated with the statistics we report.

⁶We employed the Survey Data Analysis (SUDAAN) software package developed by RTI.

D. OVERVIEW OF ANALYSIS AND REPORT

The analysis and report are organized according to the three areas of focus—program operations; participant characteristics; and a comparison of how FDPIR and the Food Stamp Program meet the food assistance needs of American Indians. The following discussion provides an overview of the remainder of the report.

Chapter II

The second chapter describes FDPIR program operations. While most of the analyses are focused on describing and comparing patterns of operation, we discuss some of the specific methods used in administering the program that have direct implications for both program efficiency and the quality of service. We begin by describing the conceptual framework that guided our analysis and proceed to a discussion of program structure and administration that explains the roles played by FNS, agencies of State government, and ITOs. We then describe the financing and staffing of local programs. The last section describes three areas of program operations—recipient relations; commodity distribution; and program controls.

The analysis of FDPIR program operations, including that pertaining to structural and organizational characteristics, is based on a sample of 30 programs chosen from the universe of 105 programs. In light of this small sample, it is not feasible to employ formal statistical techniques in this analysis. Instead, our approach compensates for small sample sizes by obtaining detailed information about each sample program. By intensively examining a broad range of issues, in effect conducting 30 case studies, we avoided some of the measurement error associated with surveys involving more narrowly focused and highly structured data collection approaches. Whereas large samples can compensate to some degree for the measurement error inherent in standardized questions and finite response sets, the range and depth of data we collected tend to improve the "precision" of the findings.

The second aspect of program operations addressed in this study were program practices that are intended to maximize efficiency and program integrity. Many of the key measures required for the analysis related to this objective are multivariate constructs representing combinations and comparisons of individual program characteristics.

Examples of the constructs and measures of program efficiency and integrity addressed in this report include:

- program efficiency (such as average total administrative cost per household, and ratio of administrative costs to value of commodities);
- program effectiveness (such as satisfaction of FDPIR participants, and dietary adequacy);
- program equity (such as the accessibility of FDPIR offices and distribution centers within the reservation or service area, and the availability of bilingual staff or materials); and
- program integrity (such as the rate of inventory discrepancies).

Chapter III

The data presented in Chapter III provide, first, a demographic and socioeconomic profile of households that received commodities in September 1989, and second, an assessment of need among FDPIR program participants. A profile of FDPIR households was developed through a detailed analysis of demographic and socioeconomic variables. The statistical tables include weighted frequency distributions, means, and standard errors, cross-tabulated by FNS administrative regions. This detailed information is summarized in a profile of the average characteristics of FDPIR households by region and overall.

An analysis of gross income is useful to examine the level of financial need among program participants. Income and resource data provided in the case record abstractions of the 827 respondent households were utilized for these calculations. Dietary needs of participants are assessed on the basis of self-reported prevalence of nutrition-related health problems and special dietary restrictions. We also examine the availability of food storage and preparation facilities in participants' homes, travel distances to food assistance offices and food stores, transportation resources, and participating households' use of food from various sources other than FDPIR.

The focus of the analysis of FDPIR household food preferences is on specific items within FDPIR food groups, such as meats, vegetables, and cereals. This information provides a measure of participant satisfaction with the program and documents the regional variation which exists in food tastes. Such data may be used to guide commodity food procurement and distribution practices at the local level, and to better meet the food preferences of program participants. We tabulated weighted frequency distributions of: (1) food items wanted but not received; (2) the first and second most pre-

ferred choice for each food type; (3) food items that are disliked; and (4) reasons for disliking an item. Regional variations in food preferences also are discussed.

Chapter IV

The final set of evaluation objectives seeks to identify dietary needs and preferences of low-income American Indians and to examine the ways in which FDPIR and the Food Stamp Program address them. The broad goal of analyses presented in Chapter IV is to provide a preliminary comparison of the availability and acceptability of the Food Stamp Program and FDPIR to low-income American Indians. This was examined through an analysis of survey data from three sources—the survey of FDPIR households; the sample of 107 food stamp households drawn from evaluation sites in which American Indians can choose to receive food stamps or FDPIR commodities; and a sample of about 285 American Indian households whose food stamp cases were selected for review by the food stamp quality control system in Summer 1986. In addition, information gathered from two focus groups with food stamp recipients and three FDPIR focus groups was examined.

Information obtained from these sources permitted us to compare American Indian food stamp and FDPIR households. Survey data also were used to simulate food stamp eligibility of FDPIR households. This, in turn, enabled us to provide a preliminary estimate of the relative cost-effectiveness of providing food assistance to American Indian households via FDPIR or the Food Stamp Program. Results of these analyses should be viewed with some caution since selected data needed to determine precisely food stamp eligibility were not available. A more indepth cost-effectiveness analysis would be possible only in the context of a full assessment of program impact.

Volumes 2 and 3

Volume 2 of the report includes detailed descriptions of the research methods employed in this study. The sample design and calculation of two sets of sample weights are discussed, as well as the variation found in the survey data. We describe the data collection procedures, as well as the derivation of analysis measures. We also present a detailed analysis of regional food preferences and the availability of commodity items by region in the fall of 1989. Volume 3 contains copies of the data collection instruments.