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Report to the Chairman, Subcommittee on Agricultural Production and Stabilization of Prices, Committee on Agriculture, Nutrition, and Forestry, U.S. Senate

November 1993

FOOD ASSISTANCE

USDA's Multiprogram Approach

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Resources, Community, and
Economic Development Division

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November 24, 1993

The Honorable David Pryor
Chairman, Subcommittee on Agricultural
Production and Stabilization of Prices
Committee on Agriculture, Nutrition,
and Forestry
United States Senate

Dear Mr. Chairman:

About 39 million persons—approximately 16 percent of the U.S. population—receive federal food assistance through the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS). In fiscal year 1992, FNS and state agencies jointly operated 14 programs that provided food assistance to eligible recipients at a federal cost of about $33 billion. This amount represented about 58 percent of USDA's total authorized budget; about 63 percent of the benefits went to children.

To obtain an overview of the federal effort to provide food assistance, you asked that we provide you with information on (1) USDA's food assistance programs; (2) the strengths and weaknesses associated with the current multiprogram approach; and (3) alternative approaches to delivering food assistance identified by federal, state, and other officials. Our findings and conclusions are based on information developed through our past work and through discussions with USDA headquarters and regional officials; state food assistance administrators in California, Delaware, Texas, and Virginia; and representatives of several food-related interest groups. (See app. I for further elaboration of our scope and methodology.)

Results in Brief

USDA's 14 food assistance programs were established separately over a 46-year period. These programs operate under their own set of objectives that were created in response to an array of perceived needs. Most of the regional FNS and state agency officials, as well as most of the interest group representatives, whom we contacted were unable to identify an overarching, cohesive federal food assistance policy or describe how individual food assistance programs interrelate with the overall food assistance effort. The Government Performance and Results Act of 1993 requires federal agencies to develop goals for each of their major program activities by fiscal year 1999. Such goals are to be stated in objective, quantifiable, and measurable terms by which progress toward achieving

those goals can be assessed. USDA's fulfillment of this requirement should provide the overall food assistance policy needed to guide the nation's food assistance efforts.

FNS and state agency officials, as well as interest group representatives, told us that the current multiprogram approach has certain strengths. It (1) targets food assistance to the needs of specific groups, such as infants, children, and the elderly; (2) increases the likelihood that those persons in need will be covered by at least one food assistance program; and (3) insulates individual food assistance programs from across-the-board food assistance budget reductions. However, they also said that the multiprogram approach has several shortcomings. It (1) creates obstacles to participants' obtaining food assistance, (2) duplicates administrative functions and increases the overall administrative costs of providing food assistance, and (3) reduces the Congress's ability to assess the comprehensive impact of the food assistance effort in meeting the needs of the poor.

A number of state agency officials responsible for the day-to-day management of food assistance programs identified alternatives to the current system. These alternatives include consolidating, streamlining, or eliminating existing programs to improve food assistance delivery and reduce overall administrative costs.

Food Assistance Programs Have Evolved Separately Without the Benefit of an Overarching Policy

Our review showed that the 14 food assistance programs have evolved at different points in time during the past 46-year period, in response to various perceived needs. The programs vary considerably in their specific objectives and in the manner in which they deliver food assistance. The current 14 programs have been developed without the benefit of a comprehensive, overarching federal food assistance policy.

USDA Has 14 Food Assistance Programs

Nearly all federal domestic food assistance is provided under USDA's 14 food assistance programs. These programs were established between 1946 and 1992—most during the 1960s. (See app. II.) USDA's food assistance programs are delivered through a decentralized structure of state and local agencies and nonprofit organizations. The 14 programs vary considerably in the type of benefits provided and in the manner of providing them. For example, food benefits may be provided in the form of food stamps, food vouchers, cash, and commodities through state welfare offices, schools, and child care, health, and social service agencies. In some programs, such

as the Food Stamp Program, the benefits are provided directly to the recipients. In other programs, such as the National School Lunch Program (NSLP) and the School Breakfast Program, the benefits are provided to an institution that prepares a meal for the programs' participants. Programs also vary in the specific populations they serve. For example, the Nutrition Program for the Elderly (NPE) targets persons aged 60 and over and their spouses, while the Special Supplemental Food Program for Women, Infants, and Children (WIC) targets low-income, nutritionally at-risk persons in the following categories: pregnant women; breastfeeding and nonbreastfeeding postpartum women; and infants and children up to age 5.

The 14 programs are commonly grouped into four categories: (1) family nutrition, (2) child nutrition, (3) supplemental food, and (4) food distribution. (See table 1.)

Table 1: USDA's Food Programs, by Category

Family nutrition[a]	Child nutrition[b]	Supplemental food[c]	Food distribution[d]
Food Stamp Program	National School Lunch Program (NSLP)	Special Supplemental Food Program for Women, Infants, and Children (WIC)	Charitable Institutions and Summer Camps Program
Nutrition Assistance Program for Puerto Rico (NAP)	School Breakfast Program	WIC Farmers' Market Program	Emergency Food Assistance Program (TEFAP)
Food Distribution Program on Indian Reservations (FDPIR)	Child and Adult Care Food Program (CACFP)	Commodity Supplemental Food Program (CSFP)	Nutrition Program for the Elderly (NPE)
	Summer Food Service Program		
	Special Milk Program		

[a]Family nutrition provides food or vouchers that can be redeemed for food for at-home consumption.

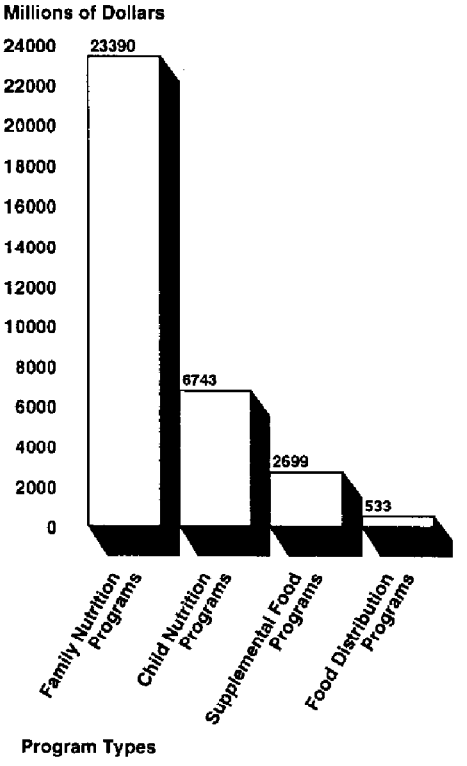
[b]Child nutrition provides commodities and/or monetary food assistance to sponsoring facilities for the benefit of attending participants.

[c]Supplemental food provides vouchers or food packages to participants.

[d]Food distribution dispenses commodities obtained from farm price support programs and market purchases.

Figure 1 shows the relative value of USDA's food assistance benefits provided in each of these four program categories during fiscal year 1992. As indicated, in fiscal year 1992 the family nutrition program category accounted for about $23.4 billion, or 71 percent, of USDA's total food assistance funding of about $33 billion.

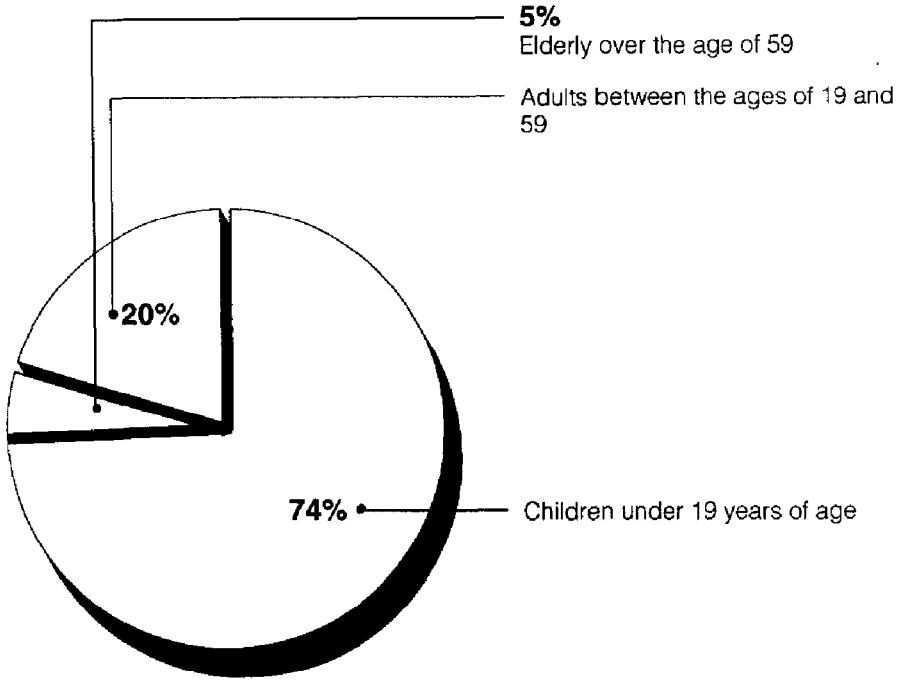
Figure 1: Value of the Four Categories of USDA's Food Assistance Programs, Fiscal Year 1992



Source: GAO's presentation of USDA's data.

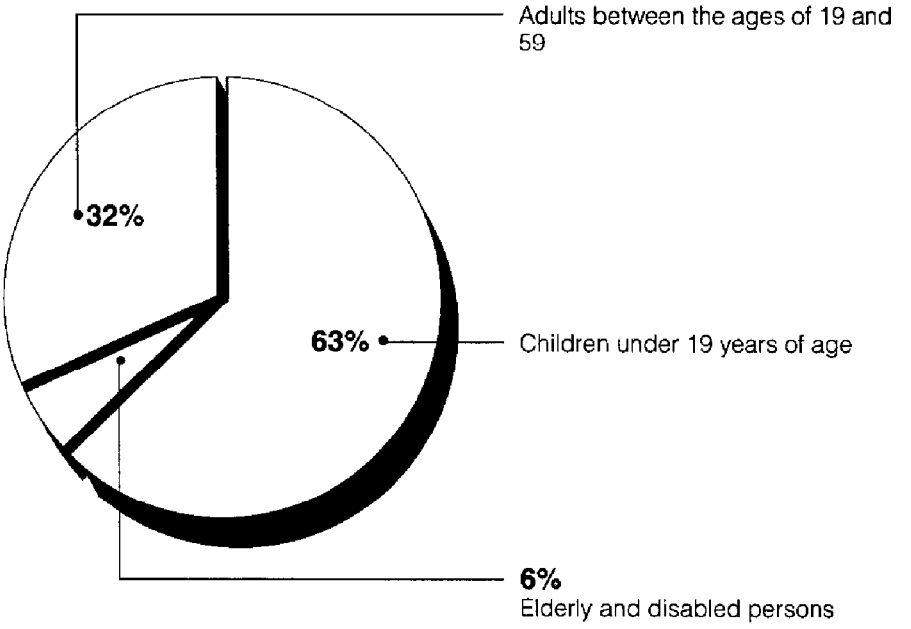
As shown in figure 2, FNS' data indicate that nearly three out of four persons receiving food assistance are children under age 19. Figure 3 shows that in fiscal year 1992, children received food assistance benefits totaling about $19.4 billion, or 63 percent of the total $33 billion in USDA food assistance funding.

Figure 2: Principal Recipients of USDA's Food Assistance, Fiscal Year 1992



Source: GAO's presentation of FNS' data.

Figure 3: Monetary Distribution of USDA's Food Assistance Benefits, Fiscal Year 1992



USDA also provides food-related services, including nutrition education and outreach, as part of its major food aid programs or through programs such as its Expanded Food and Nutrition Education Program.

In addition to USDA's programs, the Department of Health and Human Services provides food assistance for older Americans and the homeless. The federal government also makes commodities available for distribution to victims of disasters, under the Federal Disaster Relief Programs, and to needy people in certain Pacific Trust Territories.

Charitable institutions, such as religious and nonprofit service organizations, also play a major role in providing food assistance. For example, in 1992 the Second Harvest National Food Bank Network distributed more than 600 million pounds of privately donated food to about 46,000 local agencies, including food pantries, residential and homeless shelters, soup kitchens, and day care centers. (App. III provides more detailed information on the 14 programs' funding and average monthly benefits and participation, based on our analysis of available data on USDA's 14 programs.)

Most Federal and State Officials Could Not Identify an Overarching Food Assistance Policy

In our review of the development of federal food assistance programs, we did not find a written policy statement that defined the overall goals of the federal food assistance effort. Most persons we contacted were unaware of an overarching federal food assistance policy and had difficulty identifying the specific contributions that individual food assistance programs made to the overall food assistance effort. Instead, they told us that food assistance program activities are guided by individual program objectives. While these officials could describe the mission of the programs they administer, they were generally unaware of how their programs fit under the overall food assistance effort. State agency officials told us that the absence of a clearly articulated food assistance policy made it difficult for them to relate the contributions made by their program to the overall food assistance effort. Some state officials suggested that an overarching policy statement would provide a more focused approach to the delivery of food assistance. According to a Virginia Department of Education official, an overarching food assistance policy would be advantageous in identifying the future role and objectives of food assistance and in helping legislators, administrators, and others make more informed decisions about how to provide food assistance.

State agency officials told us that because many of the 14 programs have competing or different objectives, it is difficult to know how individual programs relate to each other and how the programs might be improved to better serve the needs of the target populations. Our review of program documents showed a mix of underlying purposes for the 14 programs, including (1) supporting U.S. agriculture, (2) enhancing children's learning and growth processes, (3) improving the health of Americans, and (4) improving the nutritional content of diets. (The individual program objectives are shown in table II.1.)

We observed that officials from different state agencies maintain different perspectives on the missions and objectives of the programs they administer. For example, according to its stated objective, the NSLP was established to safeguard the health and well-being of the nation's children and encourage the domestic consumption of agricultural commodities. However, state education officials, as well as certain interest group officials, told us that they see the program primarily as an adjunct to education—increasing the learning ability of school-age children. State education officials expressed the same views for the School Breakfast Program.

In response to a draft of this report, FNS headquarters officials told us that the food programs were developed in a coordinated manner under a food assistance policy that is embedded in the individual objectives of the 14 food assistance programs. In response to our observation that no written food assistance policy existed, these officials developed the following statement:

The mission of the Food and Nutrition Service is to alleviate hunger and to safeguard the health and well-being of the Nation through the administration of nutrition education and domestic food assistance programs.

—Taken together, the Nation's food programs operate on four basic principles:

—to provide a network of basic assistance to help meet the food needs of low-income households;

—to provide targeted assistance to assure the proper nutrition of children in school-based or day care situations;

—to provide supplemental nutritional assistance to special populations during critical stages of growth and development; and

—to augment the diets of low-income families and individuals with foods acquired under the price support and surplus removal authorities of the U.S. Department of Agriculture.

In recognition of the diversity of low-income Americans and their needs, food programs deliver benefits in a variety of forms, through a variety of institutions, and to a variety of target groups.

FNS' Statement Will Need Refinement to Meet New Congressional Requirements

The Congress recently enacted the Government Performance and Results Act of 1993.[1] A stated purpose of the act is to improve congressional decision-making by providing more objective information on the achievement of statutory objectives and on the relative effectiveness and efficiency of federal programs and spending. Under this legislation, federal agencies are required to establish performance plans for each major activity, beginning with fiscal year 1999. The act requires that the plans contain performance goals, stated in an objective, quantifiable, and measurable form, by which progress can be assessed in achieving those goals. We believe that FNS' statement is a good first attempt to articulate a federal food assistance policy. However, FNS will need to refine its statement to meet the requirements of the 1993 act by establishing specific

[1]Public Law 103-62, Aug. 3, 1993.

goals of the federal food assistance effort, mapping out a unified approach for achieving those goals, and describing how individual food assistance programs interrelate with the overall food assistance effort.

Current Approach Has Strengths as Well as Shortcomings

According to FNS and state food assistance officials and interest group representatives, while the current multiprogram approach for providing food assistance has certain strengths, it also has weaknesses.

Current Approach Has Certain Strengths

FNS and state agency officials and interest group representatives told us that, viewed from the perspective of ensuring the availability of food assistance to the nation's needy, the multiprogram approach has some major strengths. It (1) targets specific populations, (2) increases the likelihood that those in need will receive assistance through at least 1 of the 14 programs, and (3) insulates individual food assistance program funding from across-the-board food assistance budget reductions. First, according to some interest groups and FNS officials, the multiprogram approach offers a flexible mix of benefit packages and distribution methods that are tailored to meet the specific needs of the populations they serve. For example, programs to feed children at school seek to provide nutritious meals to enhance their health and learning abilities. At the same time, commodity distribution programs meet the special needs of those who do not have convenient access to grocery stores, including the homeless, the elderly, disaster victims, and persons residing on or near Indian reservations.

Second, with overlapping programs the federal government increases the possibility that eligible beneficiaries will receive assistance. This is particularly important, officials noted, because individual programs are often underfunded, the amount of the benefit may be too low, or the programs do not reach all intended recipients. For example, according to a Delaware Department of Health and Social Services official, while the Food Stamp Program keeps people from starving, its benefit levels do not provide a household with no other income with sufficient funding to purchase an adequate diet. Therefore, food assistance benefits from other programs are needed to make up this shortfall.

Finally, from the perspective of ensuring the availability of food assistance funding, under the multiprogram approach cuts can be made in one program without adversely affecting other programs. For example, cuts can be made in the WIC program without affecting the NSLP. Also, the

programs' congressionally diversified funding process—five committees have a major role in formulating the 14 programs' food assistance legislation—provides advocacy groups and others with a number of opportunities to contain any efforts to reduce or redirect program funding levels.

Current Approach Has Certain Weaknesses

FNS and state agency officials and interest group representatives also identified several weaknesses associated with the current 14-program approach. Specifically, although potential participants may have a greater likelihood of receiving some benefits from a multiprogram approach, the programs' independent operation and application processes can make it more difficult for participants to obtain assistance from all the programs for which they are eligible. Also, the multiple programs' duplicate management functions increase the total federal and state administrative costs of providing food assistance. Finally, it is difficult for the Congress to assess the comprehensive impact of the federal food assistance effort on meeting the needs of the poor.

First, potential recipients must often complete multiple applications to receive food assistance because these programs are managed by more than one agency at the state and local level. For example, five separate state agencies—social services, health, education, aging, and a food distribution agency—manage USDA's food assistance programs in Virginia. In California, Delaware, and Texas, four separate agencies manage these programs (see app. IV). As a result, eligible recipients may avoid applying for benefits because the application process is frustrating and degrading, according to interest group officials. In addition, potential recipients may have difficulty traveling between agencies or food distribution sites, especially those in remote locations.

If the managing agencies do not effectively coordinate services, potential recipients may not receive all the benefits to which they are entitled. Neither California nor Virginia, for example, has a statewide information-sharing system for referring potential recipients to programs for which they may be eligible. In Virginia, some programs, such as WIC, use an on-site social worker, who is responsible for referring WIC applicants to other food assistance programs. However, if the social worker is absent, WIC applicants may not be referred to other programs.

Second, a consequence of the multiprogram approach has been the duplication of program administrative functions by administering state

agencies. Common program administrative functions include (1) determining the program eligibility of applicants, (2) calculating benefits, (3) collecting and reporting program data, and (4) conducting periodic audits. Although the total expenditure for food assistance program-related administrative functions is not available, FNS and state agency officials told us that the duplication of these and similar functions increases the overall administrative costs.[2]

In addition, officials told us that program duplication diverts funds from benefits to administrative costs or forces staff to concentrate on their paperwork rather than on the needs of recipients. An FNS Southwest Region official told us that by reducing or eliminating burdensome paperwork and reporting requirements in the school meals programs, FNS could concentrate instead on providing nutritional assistance and education and save program funds by making programs easier to manage.

Finally, the overall effectiveness of the food assistance effort is difficult for the Congress to assess. USDA does not collect information on the length of time that recipients participate in the network of food assistance programs or on the total benefits that they receive—recipients may receive benefits from several food programs. The length of participation and the total benefits provided by the food assistance network can vary significantly from one person to another—even within the same household. We asked state officials to identify valuative data on the success that their programs have achieved in meeting the programs' goals. Except for the WIC and School Breakfast Programs, most state officials had difficulty providing valuative information on the specific achievements of their programs. However, these state officials told us that their programs are making a difference in the well-being of those recipients being served.

Also, state official were unable to provide examples of the beneficial impacts of their programs in concert with the overall food assistance effort. We found no broad-based studies or evaluations that identified the impact of overall federal food assistance on those being served. Available studies on the food assistance programs are too limited in scope to be of value in assessing the overall impact of the federal food assistance effort.

[2]USDA spent about $2.5 billion to administer its 14 food assistance programs in fiscal year 1992, of which almost $2.4 billion was provided to states to help offset their administrative costs. Specific information was not available on the state and local costs of operating the programs. Appendix III shows the level of federal funding provided to the states to administer the 14 programs.

Potential Alternative Approaches Could Deliver Food Assistance More Effectively

Most state agency officials told us that they had not given much thought to how their individual food assistance programs interrelate with the overall food assistance effort. According to some state agency officials, the current mix of food assistance programs works very well in meeting their individual agency's objectives. Several other state agency officials suggested that the current food assistance structure could be modified to gain greater efficiencies and better serve the needs of the poor. They discussed, in general terms, alternative approaches—consolidating, streamlining, and eliminating programs to improve effectiveness and reduce overall administrative costs. The viability of these alternatives was not discussed in the context of the possible changes that may result from the administration's on-going review of the federal welfare system and its components (for example, food assistance, education, and housing). More study is needed to evaluate the strengths and weaknesses of and make judgments on the merits of possible alternative approaches.

Programs With Similar Objectives Could Be Consolidated

By combining the food assistance programs, some officials said, USDA could reduce administrative expenses, eliminate program overlaps, and provide more food per dollar. For example, an FNS Western Region official told us that merging programs, or at least administering them jointly, could avoid overlapping and inconsistent eligibility criteria and administrative expense. Two specific options for consolidation were raised during our discussions: (1) collapse all food programs into an expanded Food Stamp Program and (2) combine programs with similar service populations, such as children and the elderly.

Under the first option, recipients would receive a basic food stamp allowance, plus adjustments to reflect their individual circumstances. For example, pregnant women would continue to receive the health care services currently provided by WIC and an extra allowance equivalent to the current WIC supplement, and families with school-age children would receive additional benefits equivalent to the value of their participation in school meal programs.

Under the second option, officials suggested, selected programs could be combined by commonly shared criteria or by program purpose. For example, on the basis of our own analysis and suggestions from officials, we identified that the current 14 programs could be collapsed into 4: (1) a basic food assistance program, (2) a supplemental assistance program for school children in an educational setting, (3) a supplemental assistance program for pregnant women and infants at nutritional risk, and (4) a food

assistance program for the elderly. Many officials agreed that each of these recombined programs should have one set of eligibility standards and reporting procedures. Table 2 shows how the 14 programs could be merged into 4 programs.

Table 2: A Four-Program Approach to Delivering Food Assistance

Program	Basic food assistance program	School meals program	Women and infants program[a]	Elderly meals program[b]
Food Stamp Program	X			
Nutrition Assistance Program for Puerto Rico (NAP)	X			
The Special Supplemental Food Program for Women, Infants, and Children (WIC)			X	
WIC Farmers' Market Program			X	
Commodity Supplemental Food Program (CSFP)			X	X
National School Lunch Program (NSLP)		X		
School Breakfast Program		X		
Child and Adult Care Food Program (CACFP)	X			X
Summer Food Service Program		X		
Special Milk Program		X		
Nutrition Program for the Elderly (NPE)				X
The Emergency Food Assistance Program (TEFAP)	X			
Food Distribution Program on Indian Reservations (FDPIR)	X			
Charitable Institutions and Summer Camps Program	X			

[a]This program would target pregnant, postpartum, and breastfeeding women and merge the women and infants portion of CSFP with WIC.

[b]This program would merge the elder portions of the CACFP and CSFP with NPE.

Existing Programs Could Be Streamlined

Some state agency officials and interest group representatives told us that streamlining programs, rather than merging them, could improve program

efficiency and reduce obstacles to participants. For example, to eliminate administrative duplication in programs that serve identical or similar target populations, one application form and one set of rules might be developed. An American School Food Service Association representative told us that the school lunch, breakfast, and summer meal programs could use this approach. Under this approach, the programs could continue to function separately, thereby ensuring that school-age children would receive assistance year-round. Similar streamlining might be achieved for persons receiving food stamps or commodity packages on Indian reservations.

Another option under widespread discussion among the people we spoke with would be to develop more uniform eligibility criteria, such as common income definitions, for certain food assistance programs, in order to ensure that needy households receive assistance. As we reported in 1989,[3] eligibility for both the Food Stamp Program and the Food Distribution Program on Indian Reservations (FDPIR) is determined by household income and assets. But eligibility is calculated differently for the two programs. As a case in point, a household may be eligible for FDPIR benefits but ineligible for food stamps because the value of an owned vehicle—not counted in the FDPIR eligibility determination—may, by itself or when added to other household resources, push the household's assets beyond food stamp eligibility limits. Consequently, although both programs target the same population, their eligibility differences could present participation obstacles.

Some officials stated that streamlining food assistance programs will need careful study before the overall impact on program costs can be estimated. Some options could actually increase overall food assistance costs by enrolling more recipients, thereby increasing total benefit costs and offsetting administrative cost savings.

Selected Programs Could Be Eliminated

Officials told us that some USDA food distribution programs are no longer needed and could be eliminated. For example, an FNS Western Region official said that the food distribution programs are probably FNS' least cost-beneficial programs. An FNS Southwest Region official pointed out that many food distribution programs were enacted, in part, to reduce government-held agricultural surpluses. However, now that these

[3]Food Assistance Programs: Nutritional Adequacy of Primary Food Programs on Four Indian Reservations (GAO/RCED-89-177, Sept. 29, 1989).

surpluses are mostly gone, the programs are expensive to operate because the government must purchase the commodities it once held in storage.

Other programs could also be eliminated because they overlap a target population served by other food assistance programs. For example, an FNS Southwest Regional official said that the population served by the Commodity Supplemental Food Program largely duplicates the WIC population, except for its elderly component, which could be merged into the Nutrition Program for the Elderly.

Program Structure Needs to Be Considered in the Context of the Welfare System

The Secretary of Agriculture recently stated that both he and the President are committed to reforming the welfare system, including food assistance programs, to better reach those in need and to promote self-sufficiency. Subsequently, USDA's Assistant Secretary for Food and Consumer Services stated that, as a part of this review, policy options to restructure food assistance programs will be considered. Several officials told us that this endeavor could result in significant welfare system changes. They said that the viability of any specific modification in the current multiprogram food assistance approach needs to be considered in the context of possible changes in the overall welfare system. They told us that the timetable for welfare system revisions is unclear at this time.

In addition, some officials told us that it would be difficult to modify the existing multiprogram approach because each program has its own constituency of providers, recipients, and advocates who would resist significant changes in the current multiprogram approach. Resistance to change would come from a wide variety of sources, especially from groups or organizations that might perceive any change as a threat to continued food assistance. For example, educators believe that school meals programs improve school attendance and academic performance; health workers believe that WIC provides nutritional education; and food distribution programs are outlets for agricultural surpluses and provide jobs to those who move, store, and process food. These officials were also concerned that combined programs that try to meet the collective needs of a broad spectrum of the needy, such as children, the elderly, and the homeless, might create gaps in coverage or reduce the overall level of food assistance provided. Others were concerned that a consolidated program would be more vulnerable to budget cuts.

Conclusions

The current food assistance approach, which has evolved over a 46-year period, is largely focused on the goals of the individual 14 food assistance programs rather than a broader view of federal food assistance needs. As a result, the current multiprogram approach may not be the most effective way of providing federal food assistance. Alternative approaches that might rectify the perceived shortcomings of the present food assistance structure are available. However, before alternatives are assessed, we believe there needs to be a clearly articulated, overarching policy statement of federal food assistance that specifies the overall goals of the federal food assistance effort and maps out a comprehensive approach, together with measurable outcomes for achieving these goals. In addition, alternative approaches should also be viewed in the larger context of congressional efforts to revamp the welfare system.

The Government Performance and Results Act of 1993 requires federal agencies to develop identifiable goals, stated in an objective and quantifiable manner, and measurable outcomes to assess their performance. The act requires federal agencies to develop such goals for each of their major program activities, beginning with fiscal year 1999. FNS' recent statement is a good first step toward articulating a federal food assistance policy. USDA's fulfillment of the act's requirements should lead to a food assistance policy that is needed to guide the nation's food assistance efforts.

Agency Comments and Our Evaluation

In commenting on a draft of this report, USDA stated that it supports the report's objective of providing an overview of the federal effort to provide food assistance to low-income Americans and that the Secretary and the Assistant Secretary for Food and Consumer Services are committed to improving USDA's food assistance performance. However, USDA stated the following:

- Although federal and state officials could not identify an overall food assistance policy, a reasonably cohesive statement of food assistance policy exists; the 14 food assistance programs, taken together, form a network of basic and supplemental food assistance serving a diversity of needs; and USDA would not characterize the implications in quite the same fashion as the report.
- The report draws broad conclusions on the basis of the presented evidence, without clearly establishing the risks or harm of existing policies and programs.

- The report understates the success of the current food assistance delivery approach and the level of coordination that occurs among these and other federal assistance programs.

  We disagree with USDA's statement that a reasonably cohesive food assistance policy exists. We did not find a written statement of policy during our review. Except for FNS headquarters officials, those with whom we spoke were not aware of an overarching food assistance policy—either written or unwritten. Neither did we find other indications that an overarching policy has been, or is now, guiding the development and operation of the nation's food assistance efforts. Although the statement prepared by FNS headquarters officials for this review may capture USDA's understanding of the nation's food assistance policy, it does not establish specific goals of the federal food assistance effort, map out a unified approach for achieving those goals, or describe how individual food assistance programs interrelate with the overall food assistance effort. Therefore, we continue to believe that a clearly articulated overarching food assistance policy statement is needed to provide a broader and more cohesive view of food assistance objectives.

  Our conclusions are based, in part, on the information and concerns gathered from a wide variety of organizations and persons that have been, or continue to be, involved with the development, administration, and operation of USDA's food assistance programs. The purpose of this report is to describe the current food assistance approach, including its perceived strengths and weaknesses. We did not evaluate the strengths and weaknesses to determine the risks or harm posed by the current approach.

  Finally, as discussed in the strengths and weaknesses section of this report, we have recognized the contributions associated with the current food assistance approach.

  USDA officials also suggested several technical revisions that have been incorporated in the report, as appropriate. (See app. V for the full text of USDA's comments and our specific responses.)

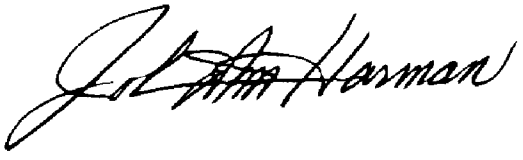
We conducted our work from March through October 1993 in accordance with generally accepted government auditing standards.

As agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the

date of this letter. At that time, we will send copies of this report to appropriate congressional committees, interested Members of Congress, the Secretary of Agriculture, and other interested parties. We will also provide copies to others on request.

If you have any questions, please contact me at (202) 512-5138. Major contributors to this report are listed in appendix VI.

Sincerely yours,



John W. Harman
Director, Food and
Agriculture Issues

Contents

Letter		1
Appendix I Scope and Methodology		22
Appendix II Objectives and Description of USDA's Food Assistance Programs		24
	Family Nutrition Programs	24
	Child Nutrition Programs	25
	Food Distribution Programs	27
	Supplemental Food Programs	28
Appendix III USDA's Food Assistance Programs: Fiscal Year 1992 Funding and Average Monthly Benefits and Participation		30
Appendix IV State Agencies Managing USDA's Food Assistance Programs		32
Appendix V Comments From the U.S. Department of Agriculture		33
	GAO's Comments	36

Appendix VI Major Contributors to This Report 38

Tables

Table 1: USDA's Food Programs, by Category 3
Table 2: A Four-Program Approach to Delivering Food Assistance 13
Table II.1: Summary of Program Objectives 29

Figures

Figure 1: Value of the Four Categories of USDA's Food Assistance Programs, Fiscal Year 1992 4
Figure 2: Principal Recipients of USDA's Food Assistance, Fiscal Year 1992 5
Figure 3: Monetary Distribution of USDA's Food Assistance Benefits, Fiscal Year 1992 6

Abbreviations

CACFP	Child and Adult Care Food Program
CSFP	Commodity Supplemental Food Program
FDPIR	Food Distribution Program on Indian Reservations
FNS	Food and Nutrition Service
GAO	General Accounting Office
NAP	Nutrition Assistance Program for Puerto Rico
NPE	Nutrition Program for the Elderly
NSLP	National School Lunch Program
TEFAP	The Emergency Food Assistance Program
USDA	U.S. Department of Agriculture
WIC	Special Supplemental Food Program for Women, Infants, and Children

Scope and Methodology

To obtain an overview of the federal effort to provide food assistance and to provide your office with specific information on (1) federal food assistance policy, (2) the strengths and weaknesses associated with the current multiprogram approach, and (3) alternative approaches, we obtained relevant information and data from Food and Nutrition Service (FNS) headquarters in Alexandria, Virginia, and three regional offices that service states with relatively large and small food assistance populations. These offices include the Southwest Regional Office in Dallas, Texas; the Western Regional Office in San Francisco, California; and the Mid-Atlantic Regional Office in Trenton, New Jersey.

We visited state agencies responsible for administering the U.S. Department of Agriculture's (USDA) food assistance programs in California, Delaware, Texas, and Virginia. Specific agencies contacted included the California Departments of Education, Health Services, Social Services, and Aging; Delaware Departments of Health and Social Services, and Public Instruction; Texas Departments of Aging, Education, Health, and Human Services; and Virginia Departments of Aging, Agriculture and Consumer Services, Education, Health, and Social Services.

We selected these four states because, we believe, they provide a diverse perspective on the operation of USDA's food assistance programs in states with relatively large (California and Texas), medium (Virginia), and small (Delaware) numbers of participants.

We gathered information from organizations with varied interests in food and nutrition issues or research. These groups included the American Public Welfare Association; American School Food Service Association; Catholic Charities, USA; Center on Budget and Policy Priorities; California-Nevada Community Action Association; Christian Relief Services; Community Nutrition Institute; Cornell University, Nutrition and Health Policy; Food and Research Action Center; National Academy of Sciences; National Association of WIC Directors; and Tufts University, School of Nutrition.

To obtain an overview on federal food assistance efforts, we conducted an extensive literature search for information on the

- role of the federal government in providing food assistance;
- establishment of USDA's food assistance programs; and
- participation in, costs of, and benefits provided by federal food assistance programs.

To determine if USDA has a food assistance policy, we

- reviewed USDA, GAO, and other sources of documentation and obtained information from USDA, state, and interest group officials and
- obtained information on the objectives of each of USDA's 14 food assistance programs.

To identify the strengths and weaknesses associated with the current multiprogram approach, we

- reviewed information on program (1) eligibility criteria, (2) benefit type and costs, and (3) administrative processes and costs;
- interviewed USDA, state agency, and interest group officials to obtain their views on how effectively and efficiently the multiprogram food assistance approach is addressing the nutritional needs of low-income persons; and
- reviewed GAO and USDA Office of the Inspector General reports to identify food assistance problems and gather examples of program and administrative strengths and weaknesses that appear linked to the multiple food assistance approach.

To disclose the possible alternative approaches to delivering food assistance, we solicited ideas, suggestions, and relevant data from USDA, state, and interest group officials on ways to improve federal food assistance.

Each of the consolidation, streamlining, or elimination alternatives discussed in this report has associated implications that have not been fully explored. Moreover, none of these alternatives were discussed in relation to the welfare reform initiative being considered by the current administration.

We conducted our review from March through October 1993 in accordance with generally accepted government auditing standards.

Objectives and Description of USDA's Food Assistance Programs

The 14 food assistance programs are commonly grouped into four administrative categories: family nutrition programs, child nutrition programs, supplemental food programs, and food distribution programs. A brief description of each food program and the year it was established is provided below. The objectives of each program are summarized in table II.1.

Family Nutrition Programs

The family nutrition programs provide food or vouchers that can be redeemed for food for at-home consumption.

Food Stamp Program (1961)

The objectives of this program are to (1) provide monthly food stamps or coupons to low-income families and individuals to help them purchase a nutritionally adequate diet and (2) strengthen the agricultural economy.

The Food Stamp Program is the largest food assistance program, serving an average of about 25 million people monthly at a total cost of about $22 billion in fiscal year 1992, according to USDA data. The Food Stamp Program began as a demonstration project in 1961 and became fully operational by 1964. The program helps meet the basic food needs of low-income families and individuals by increasing their purchasing power. Coupons issued monthly to eligible households can be redeemed like cash for food items at authorized retail stores. The program is available to all certified eligible individuals. Benefits are determined by household size, income and asset levels, and certain nonfinancial requirements.

Nutrition Assistance Program for Puerto Rico (NAP, 1982)

The objective of this program is to provide monthly cash benefits to help low-income families and individuals purchase a nutritionally adequate diet.

In July 1982, the Food Stamp Program in Puerto Rico was replaced by NAP, an $825 million block grant program. Subsequent legislation has authorized increases in the level of block grant funding, raising the total authorized appropriation for fiscal year 1992 to $1.013 billion. According to USDA data, NAP provided benefits to an average of about 1.5 million people monthly as of June 1992. Program benefits vary by household size, income, and asset levels. The program is available to all applicants who meet its eligibility criteria. However, because of the block grant's funding limitations, NAP participants must meet more restrictive participation criteria than Food Stamp Program recipients.

Food Distribution Program on Indian Reservations (FDPIR, 1977)

The objective of this program is to provide monthly food packages to help low-income persons residing on or near Indian reservations maintain nutritious diets.

FDPIR operates as an alternative to the Food Stamp Program for families living on or near Indian reservations. Under the program, recipients receive food packages, including canned meats, fruits and vegetables, and dairy products. According to USDA data, FDPIR was serving an average of about 116,000 people monthly at a total cost of about $62 million in fiscal year 1992.

Child Nutrition Programs

Child nutrition programs provide commodities and/or monetary assistance to children under the age of 19 and elderly or impaired adults; they operate through schools and other child care settings.

National School Lunch Program (NSLP, 1946)

The objective of this program is to provide nutritionally balanced, low-cost or free lunches to safeguard the health and well-being of the nation's children.

The NSLP is the largest of the child nutrition programs, serving meals to a daily average of about 25 million students at a total federal cost of about $4.6 billion in fiscal year 1992, according to USDA data. NSLP provides cash and commodity foods to nonprofit food services in public and nonprofit private schools and in residential child care centers. Low-income students may qualify to receive their meals free or at a reduced price, and cash payments are made to states on the basis of the number of meals served in the free, reduced-price, or full-price categories. Entitlement commodities are provided by law at a per-meal rate (currently 14 cents per meal). Additional, or bonus, commodities are provided as available through USDA's agricultural price support or surplus removal programs. The participation and program outlays of the other child nutrition programs are modest in comparison to those of NSLP.

School Breakfast Program (1966)

The objective of this program is to provide cash assistance to states to initiate, maintain, or expand nonprofit breakfast programs in eligible schools and residential child care institutions.

As in the NSLP, low-income children may qualify to receive school breakfast free or at reduced price, and states are reimbursed according to

the number of meals served in each category. Additional funding may be available for "severe need" schools, where at least 40 percent of meals are served free or at reduced price. According to USDA data, the program operated in about 50,000 schools and institutions, providing about 4.9 million meals daily in fiscal year 1992 at a federal cost of about $796 million.

Child and Adult Care Food Program (CACFP, 1968)

The objective of this program is to provide nutritious meals and snacks to children and elderly or impaired adults by providing federal funds and commodity foods to maintain nonprofit meal services in nonresidential institutions.

At childcare and adultcare centers, the income eligibility and reimbursement criteria are the same as those for the NSLP and the School Breakfast Program. At adultcare centers, all meals are served free, but the reimbursements are lower. Participants at all institutions are limited to two meals and one snack per day. According to Congressional Research Service data, average daily participation at childcare homes or centers and at adultcare centers in fiscal year 1992 was about 1.7 million and 20,000, respectively. The federal cost of operating CACFP in fiscal year 1992 was about $1 billion, according to USDA.

Summer Food Service Program (1969)

The objective of this program is to provide meals and snacks for children in low-income areas when school is not in session. In areas where schools operate year-round, the program may be available at other times. According to USDA data, the program provided about 107 million meals daily in fiscal year 1992 at a federal cost of about $204 million.

Special Milk Program (1955)

The objective of the Special Milk Program is to provide milk to children in public and private nonprofit schools and in nonprofit residential or nonresidential childcare institutions, provided they do not also participate in other federal meal service programs. Schools participating in other federal programs that operate split-session prekindergarten and kindergarten programs may participate in the Special Milk Program to provide milk to children in those programs who do not have access to National School Lunch Program or School Breakfast Program meals.

The Special Milk Program is available to all children in participating schools and institutions regardless of family income, except in those

schools operating the Special Milk Program solely for kindergarten children. According to USDA data, the program provided a total of about 174 million half-pints of milk at a federal cost of about $20 million in fiscal year 1992.

Food Distribution Programs

The food distribution programs historically have been associated with surplus commodities obtained through farm price support programs.

Charitable Institutions and Summer Camps Program (1988)

The objective of this program is to provide meals to needy persons via charitable institutions, such as soup kitchens, orphanages, summer camps, and churches. USDA provides surplus commodities to eligible charitable institutions not covered by other USDA programs. According to USDA's data, about $153 million worth of commodities was donated by the program in fiscal year 1992.

The Emergency Food Assistance Program (TEFAP, 1981)

The objective of this program is to provide nutritional assistance by distributing surplus commodities to low-income households, including unemployed persons. TEFAP is the largest of the food distribution programs, accounting for about $236 million, or about 44 percent of total food distribution program costs in fiscal year 1992, according to USDA data. Benefits are provided in the form of commodity packages intended for at-home preparation and consumption. The actual amounts of commodities received by households depend on the frequency of the distribution (monthly or quarterly) and the allowable allotments, based on household size (both of which vary from state to state).

Nutrition Program for the Elderly (NPE, 1965)

The objectives of this program are to provide nutritious meals for persons age 60 and over and their spouses to (1) promote better health and (2) reduce isolation that may occur in old age by making the meals a focal point for activities. Indian tribal organizations may select an age below 60 for defining "elderly" persons. NPE is a program in which USDA provides food and funds in lieu of commodities to the U.S. Department of Health and Human Services, which administers congregate and home-delivered meal programs to the elderly. In fiscal year 1992, USDA supplied about $145 million in cash and commodities to provide about 244 million meals to the elderly, according to USDA data.

Supplemental Food Programs

The supplemental programs provide food vouchers or food packages to participants.

The Special Supplemental Food Program for Women, Infants, and Children (WIC, 1974)

The objectives of this program are to provide monthly food supplements, nutrition education, and access to a health care network to improve the nutritional status of low-income, nutritionally at-risk groups: pregnant women, breastfeeding and nonbreastfeeding postpartum women; and infants and children up to age 5. Of all the food assistance programs aimed at improving nutrition, only WIC requires determination of nutritional need. A doctor, nutritionist, nurse, or health official must deem a mother or child nutritionally at risk to qualify them for eligibility in the program. Program benefits are food packages, usually provided to participants in the form of vouchers, or checks that are redeemed for specific food items in retail grocery stores. Food items are prescribed according to the participant's nutritional need. USDA's data show that the program provided benefits to an average of about 5.4 million women and children monthly at a total cost of about $2.6 billion in fiscal year 1992.

WIC Farmers' Market Nutrition Program (1992)

The first objective of this program is to improve the nutritional status of the low-income, nutritionally at-risk groups described above by encouraging them to consume fresh, nutritious, unprepared foods such as fruits and vegetables. The second objective is to increase the awareness and use of farmers' markets by providing food vouchers that participants can redeem for foods at farmers' markets. In fiscal year 1992, the total cost for the Farmers' Market Nutrition Program was about $2 million.

Commodity Supplemental Food Program (CSFP, 1969)

The objective of this program is to provide supplemental commodity foods and nutrition education to low-income persons: pregnant women, breastfeeding and nonbreastfeeding postpartum women, infants, children up to age 6, and persons age 60 and over—a population similar to that of WIC. Recipients may not participate in WIC and CSFP simultaneously. As in WIC, food packages are tailored to the nutritional needs of participants. In addition to the regularly authorized commodities, participants may periodically receive additional food from agricultural surpluses. In fiscal year 1992, about 343,000 persons participated in CSFP, creating a total program cost of about $105 million.

Table II.1: Summary of Program Objectives

	Program objectives[a]			
Programs	**Agriculture support**	**Education**	**Health**	**Nutrition**
Food stamps	X			X
NAP				X
WIC		X	X	X
Farmers' market	X			X
CSFP		X		X
NSLP	X		X	X
CACFP				X
NPE			X	X
TEFAP	X			X
FDPIR				X
Charitable institutions and summer camps	X			

[a]No specific objectives were stated for the School Breakfast, Summer Food, and Special Milk Programs.

USDA's Food Assistance Programs: Fiscal Year 1992 Funding and Average Monthly Benefits and Participation

Dollars and participant levels in millions

Food programs	Benefit costs	State admin. expenses	Total costs	Average benefit[a]	Child participants[b]	Elderly participants[c]	Total participants
Food Stamps[d]	$20,902.3	$1,420.2	$22,322.5	$68.57	13.3	1.8	25.4
NAP	975.6[e]	30.3	1,005.9	54.22	0.6[f]	0.2[f]	1.5
WIC[g]	1,960.3	633.6	2,593.9	30.20	4.2	[h]	5.4
CSFP	87.1	18.1	105.2	17.31[i]	0.2	0.1	0.3
NSLP[j]	4,565.2	48.2	4,613.4	20.59	24.6	[h]	24.6
School Breakfast[j]	786.8	8.9	795.7	17.78	4.9	[h]	4.9
CACFP[k]	996.5	113.7	1,110.2	48.85	1.7	0.002[l]	1.7
Summer Food[m]	184.7	19.1	203.8	32.66	1.9	[h]	1.9
Special Milk	19.5	0.3	19.8	2.42[n]	0.9	[h]	(est.) 0.9[n]
NPE	144.1	None	144.1	[o]	[h]	0.9	0.9[p]
TEFAP	191.5	44.3	235.8	[o]	[o]	[o]	[o]
FDPIR	45.3	16.7	62.0	36.64	[o]	[o]	0.1
Charitable Institutions and Summer Camps	153.0	None	153.0	[o]	[o]	[o]	[o]
Total	**$31,011.9**	**$2,353.4[q]**	**$33,365.3**	[h]	[h]	[h]	[h]

(Table notes on next page)

[a]Data in dollars and cents.

[b]Generally includes persons age 18 and under.

[c]Includes persons age 60 and over.

[d]Administrative expenses do not include $133,783,885 for employment and training.

[e]Does not include $10,825,000 for tick eradication project.

[f]Participant data based on 1991 information.

[g]Includes $2,082,586 for the WIC Farmers' Market Nutrition Program.

[h]Not applicable.

[i]The average benefit for elderly participants is $14.28.

[j]Participant data based on average daily participation. Average benefit based on benefit cost divided by participants divided by 9 months. This assumes 9 months of participation on a daily basis.

[k]Participant data based on average daily participation. Average benefit based on benefit costs divided by participants divided by 12 months. Participant data based on a Congressional Research Service Report for the Congress, dated April 14, 1993.

[l]Includes 20,400 disabled adults age 18 and over.

[m]Average benefits based on benefit costs divided by participants divided by 3 months. Total participants based on average participants during July peak season.

[n]Based on a Congressional Research Service Report for the Congress, dated April 14, 1993.

[o]Data not available.

[p]Based on number of meals served.

[q]Total does not include $103.8 million for FNS administration, including federal salaries and other expenses necessary to administer FNS programs.

Source: GAO's analysis of USDA's and Congressional Research Service's data where noted.

State Agencies Managing USDA's Food Assistance Programs

Programs	California	Delaware	Texas	Virginia
Food Stamps	Social Svcs.	Health and Social Svcs.	Human Svcs.	Social Svcs.
NAP	[a]	[a]	[a]	[a]
WIC	Health Svcs.	Health and Social Svcs.	Health Svcs.	Health Svcs.
Farmers Market	[a]	[a]	Health Svcs.	[a]
CSFP	Education	[a]	[a]	[a]
NSLP	Education	Public Instruction[b]	Education & Human Svcs.[c]	Education[b]
School Breakfast	Education	Public Instruction[b]	Education & Human Svcs.[c]	Education[b]
CACFP	Education	Public Instruction	Human Svcs.	[d]
Summer Food	[e]	Public Instruction	Human Svcs.	[d]
Special Milk	Education	Public Instruction[b]	Education & Human Svcs.[c]	Education[b]
NPE	Aging	Administrative Svcs.	Aging	Aging
TEFAP	Social Svcs.	Administrative Svcs.	Human Svcs.	Agriculture & Consumer Svcs.
FDPIR	[e]	[a]	[a]	[a]
Charitable Inst. and Summer Camps	Education	Administrative Svcs.	Human Svcs.	Agriculture & Consumer Svcs.

[a]Indicated programs do not operate in these states.

[b]USDA administers feeding programs in private schools.

[c]The Education Agency administers public school feeding programs. The Human Services Agency administers private school feeding programs.

[d]USDA administers the cash (reimbursement for meals served) portion of the feeding programs. Virginia's Agriculture and Consumer Services administers the commodity portion.

[e]Programs administered by USDA.

Comments From the U.S. Department of Agriculture

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive
Alexandria, VA 22302

NOV 5 1993

John W. Harman
Director, Food and Agricultural Issues
U. S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Harman:

Thank you for the opportunity to review and comment on the most recent draft of the U.S. General Accounting Office (GAO) proposed report, entitled FOOD ASSISTANCE: USDA's Multiprogram Approach (GAO/RCED-93-218). We support the draft report's stated objective of obtaining an overview of the federal effort to provide food assistance to low-income Americans. Careful, well-reasoned reviews of existing program objectives, implementation, and results are critical to improving the performance of Federal programs. Both Secretary Espy and Assistant Secretary Haas are personally committed to reinventing USDA to improve program performance by searching for the best mix and improving the nutritional performance of food assistance programs.

Notwithstanding our enthusiasm for the shared goal of program improvement, we have three broad concerns with the draft report. First, we continue to disagree with the principal conclusion that the federal food assistance approach has been crafted without the benefit of an overall food assistance policy. Further, we are unsure as to what the GAO believes is the consequence of this conclusion. Second, we are concerned that many readers will be left with an impression that the evidentiary base for many of the implications drawn from the reported findings is stronger than it really is. And finally, we believe that the draft report understates the success of the existing array of food assistance programs and the extensive coordination that occurs every day among these and other federal assistance programs.

Overall Food Assistance Policy

The draft report concludes that most Federal and State officials could not identify an overall food assistance policy. While such a finding may be literally true based on the interviews GAO conducted, we would not characterize its implications in quite the same fashion as the draft report.

As we discussed with GAO staff in response to an earlier draft, we believe that a reasonably cohesive statement of food assistance policy exists. We believe that each of the 14 domestic food assistance programs is consistent with the mission

of alleviating hunger and safeguarding the health and well-being of the Nation. Taken together, the Nation's food programs form a network of basic assistance to meet the need of most and supplemental assistance to meet the special needs of some. In recognition of the diversity of low-income Americans and their needs, food programs deliver benefits in a variety of forms, through a variety of institutions, and to a variety of target groups. This diversity is not a symptom of the absence of a coherent policy framework, but is, instead, the very essence of that policy.

This is not to say that there is no room for improvement from the status quo, that the Nation has identified the right number and mix of food assistance programs, or that all existing programs meet all of their objectives. Rather, we believe programs and policies must constantly evolve to better meet the changing needs of American society. Given this dynamic, we are unsure why one should be surprised that participants at different levels of a complex service-delivery system might have different perspectives (or lack an overall picture) of overall food assistance policy.

See comment 1.

The Evidentiary Base

The findings and conclusions of the draft report are based on GAO's past work, and discussions with government officials and representatives of several interest groups. We are concerned that the draft report draws broad conclusions on the basis of the presented evidence without clearly establishing the risk or harm of existing policies and programs. We are concerned that the draft report relies on what amounts to little more than anecdotes to build the case that multiple food assistance programs are inefficient or ineffective or that an alternative food assistance structure might be more efficient and effective. Such important, fundamental policy questions demand stronger methods and more careful analysis.

See comment 2.

The Success of Existing Food Assistance Programs

We should not lose sight of the fact that on any given day, the Nation's food assistance programs touch the lives of over 40 million (or one in every six) Americans; that food stamps reach over 27 million needy Americans; that WIC serves two out of every five babies born in the United States; and that school meal programs reach more than 25 million children. Moreover, contrary to the implications of your report, participation in these programs has been shown to be linked to desirable outcomes (such as, increased and more nutritious food consumption, healthier newborns). To build on this foundation of success, we all need to do better in describing what works, what does not work, and why.

In addition, we should not lose sight of the extent of interagency coordination efforts to streamline program administration and application processes. The draft report seems to incorrectly assume that program recipients must complete multiple applications merely because the programs are administered by different State and local agencies. This assumption does not recognize the Department's longstanding policy of promoting the integration and coordination of services, both within USDA and across Departments. The Department has been in the forefront of encouraging, supporting and providing technical assistance to States to streamline and simplify program access and application processes, through such efforts as co-location of services, the development of joint application forms and requiring or permitting recipients of various programs to be deemed automatically income eligible for another food assistance program. Recipients of the Food Stamp Program are automatically eligible for the School Lunch Program and automatically income eligible for the WIC Program. WIC State agencies extend this policy of automatic income eligibility to other State-administered programs, such as the School Lunch Program. The Commodity Supplemental Food Program, The Emergency Food Assistance Program, and other community programs can establish eligibility based on participation in other means-tested assistance programs. The Nutrition Program for the Elderly has no application for eligibility at all. Therefore, the need for multiple applications for multiple food assistance programs is eliminated or significantly reduced.

See comment 3.

Conclusion

While we are disappointed that the draft report does not advance the formulation of appropriate food assistance policy as far as it might have, the issue of the proper number and structure of food assistance programs remains fundamentally important. The time has come to change the way we do the government's business. Under Secretary Espy's leadership, we have taken several aggressive steps already to improve program delivery through expanded use of Electronic Benefit Transfer, to make nutrition an integral part of food assistance, and to improve program responsiveness. There is still more to be done, and we are committed under the leadership of Secretary Espy and Assistant Secretary Haas to improve the delivery of food assistance to needy Americans.

Sincerely,

George A. Braley
Acting Administrator

GAO's Comments

1. We disagree with USDA's statement that a reasonably cohesive food assistance policy exists. We did not find a written statement of policy during our review. Except for FNS headquarters officials, those with whom we spoke were not aware of an overarching food assistance policy—either written or unwritten. Neither did we find other indications that an overarching policy has been, or is now, guiding the development and operation of the nation's food assistance efforts.

Although the statement prepared by FNS headquarters officials for this review may capture USDA's understanding of the nation's food assistance policy, it does not establish specific goals of the federal food assistance effort, map out a unified approach for achieving those goals, or describe how individual food assistance programs interrelate with the overall food assistance effort. Instead, the current programs are largely managed in light of narrowly focused individual program goals that do not respond to a broader view of federal food assistance needs. In our view, FNS has been and is currently managing the 14 separate programs without the benefit of overarching performance goals, stated in an objective, quantifiable, and measurable form. While this approach might have been acceptable in the past, we believe that current issues—for example, the need to reform the welfare system, pressures to deliver programs more efficiently, and budget constraints—demand a more comprehensive approach for addressing the nation's food assistance needs.

2. In conducting our review, we met with current and former USDA headquarters officials and representatives of interest groups that have played a significant role in the current food assistance structure. In addition, we met with officials of three of seven FNS regions. The four states we selected represent a broad spectrum of food assistance programs. Texas and California are two of the top states in terms of the value and amount of federal food assistance provided to recipients. Virginia and Delaware represent medium and small states, respectively, in these terms. In each of these states, we interviewed top officials—many of whom were identified by FNS—who were responsible for the day-to-day operation of the food programs. We could have expanded our coverage to other states. However, we do not believe that additional responses would be significantly different from those obtained in the four states we visited.

The purpose of this report is to describe the current food assistance approach, including its perceived strengths and weaknesses. We did not evaluate the risks or harm posed by the weaknesses that were associated with the current approach by the persons we contacted. Also, we have

recognized the contributions associated with the current food assistance approach, as well as its weaknesses.

3. We disagree with FNS' perception that the report does not recognize the success of existing food assistance programs. The report discusses the strengths of the current approach as well as its weaknesses. A number of officials cited initiatives that they had undertaken or were undertaking to improve coordination between programs. In some cases, these were cited as evidence to support the need for streamlining and consolidating programs. We did not highlight each and every such initiative in the report. Rather, we have elected to highlight the most frequently cited attributes and deficiencies of the current approach.

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