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*REPORT TO THE SELECT COMMITTEE
ON NUTRITION AND HUMAN NEEDS
UNITED STATES SENATE*

Administration And Effectiveness
Of Family Food Programs On
Selected Indian Reservations
In New Mexico And South Dakota

A-51604

Food and Nutrition Service
Department of Agriculture

*BY THE COMPTROLLER GENERAL
OF THE UNITED STATES*

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MAY 30, 1974



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

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The Honorable George S. McGovern, Chairman
Select Committee on Nutrition and Human Needs *55800*
United States Senate

Dear Mr. Chairman:

We are reporting on our review of certain aspects of the food stamp program as it relates to Indians on selected reservations in Sandoval County, New Mexico, and the food stamp and food distribution programs as they relate to Indians on three South Dakota reservations. The Food and Nutrition Service, *513*
2 Department of Agriculture, administers these programs. *42*

13 *BT (17.2)*
We made the review in accordance with your request of April 3, 1973, and subsequent discussions with your office. As agreed, we discussed our findings with agency officials and have incorporated their comments in the report.

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Also as agreed, we will subsequently release copies of this report to the Director, Office of Management and Budget; the Chairmen of the Senate and House Committees on Government Operations and Appropriations, the Senate Committee on Agriculture and Forestry, the House Committee on Agriculture, and the House Committee on Education and Labor; Senator *<1500*
<300
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Pete V. Domenici; and the Secretary of Agriculture. We do not plan to distribute this report further unless you agree or publicly announce its contents.

Sincerely yours,

Acting

Comptroller General
of the United States

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Grocery stores, trading posts, and food
distribution locations--Cheyenne River
Reservation

ABBREVIATIONS

FDP	food distribution program
FSP	food stamp program
GAO	General Accounting Office

COMPTROLLER GENERAL'S REPORT TO
THE SELECT COMMITTEE ON NUTRITION
AND HUMAN NEEDS
UNITED STATES SENATE

ADMINISTRATION AND EFFECTIVENESS
OF FAMILY FOOD PROGRAMS ON
SELECTED INDIAN RESERVATIONS
IN NEW MEXICO AND SOUTH DAKOTA
Food and Nutrition Service
Department of Agriculture A-51604

D I G E S T

WHY THE REVIEW WAS MADE

At the Chairman's request, GAO has reviewed (1) certain aspects of the food stamp program as it relates to Indians on selected reservations in Sandoval County, New Mexico, and (2) the food stamp and food distribution programs as they relate to Indians on the Cheyenne River, Pine Ridge, and Rosebud Reservations in South Dakota.

The Food and Nutrition Service, Department of Agriculture, administers the programs nationally, and State agencies administer them locally.

As requested, GAO gave special attention to (1) the efficiency of State agency program administration as opposed to possible tribal government administration and (2) questions of whether, due to the unique problems involved, either program by itself was capable of providing nutritionally adequate diets, or whether a combination of the two programs or a third, alternative program was called for on the reservations.

FINDINGS AND CONCLUSIONS

The food stamp program is designed to help low-income

households obtain more nutritionally adequate diets by enabling them to buy subsidized food through regular grocery stores. The food distribution program is intended to supplement family food purchases. Federal law provides that a household can participate in only one program.

The Agriculture and Consumer Protection Act of 1973 provides that, by July 1, 1974, the food stamp program is to replace the food distribution program in all political subdivisions of participating States, unless such replacement can be demonstrated to be impossible or impracticable. (See p. 5.) A number of bills have been introduced in the Congress which would extend the authority for the food distribution program beyond July 1, 1974, and permit Indian tribes to administer their own food stamp programs. (See p. 7.)

State versus tribal government administration of food stamp program

The States' administration of the food stamp program in the counties GAO visited generally was satisfactory, although some improvements were needed to increase South Dakota's outreach efforts and to make stamps available for purchase more frequently and at more locations.

GAO found no evidence that tribal government administration of the food stamp program, which is not now authorized by the enabling legislation, would be any more efficient or effective than State agency administration.

If tribal governments were authorized to administer the food stamp program on the reservations, its administrative costs would likely increase because additional administrative units would be established and existing State and county-level units probably would be kept to serve non-Indian participants. (See p. 8.)

Administration of food distribution program

South Dakota's State Department of Public Instruction was responsible for the food distribution program in South Dakota and carried out some program functions. The area office of the Department of the Interior's Bureau of Indian Affairs and the tribal governments, however, were heavily involved in administering the program on the reservations through agreements with the State.

Tribal officials GAO interviewed at the three South Dakota reservations before enactment of the 1973 legislation expressed little interest in assuming complete responsibility for administering the food distribution program.

The Bureau's area office and the tribal governments were not carrying out some of the

supervision, certification, and recordkeeping functions delegated to them. These deficiencies might have been minimized had the Bureau provided better training and closer supervision. (See p. 12.)

Capability of programs to provide adequate diets

GAO noted no problems unique to the Indians that would prevent them from obtaining adequate diets under either program. However:

- Some South Dakota Indians relied primarily on the food distribution program for their diets, although the program, by itself, was not intended to provide adequate diets.
- The food stamp program is designed to enable participants to purchase nutritionally adequate diets, but participants need skill in buying and preparing foods.
- Nutrition education, which participants need to obtain the full benefits from either program, was limited on the South Dakota reservations.
- For participants to receive full benefits from the food stamp program, they must have accessible, adequate grocery stores.

No alternative food assistance program would insure that participants would eat nutritionally adequate diets. For any food assistance program to

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be effective, the participants must know what constitutes an adequate nutritional diet and must apply this knowledge. (See pp. 15 and 18.)

RECOMMENDATIONS

GAO is recommending to the Secretary of Agriculture that:

- If reservations now participating in the food distribution program are to be brought into the food stamp program, the Food and Nutrition Service, in cooperation with State administering agencies, make a concerted effort, before the food stamp program starts, to inform potentially eligible Indians of the benefits of the program and how it operates. (See p. 11.)
- The Food and Nutrition Service work with the State administering agencies, particularly in South Dakota, to assess the need for more and better located food stamp issuance points and the feasibility of mailing stamps to participants. (See p. 11.)
- Should food distribution projects be continued beyond July 1, 1974, the Food and Nutrition Service insure that the administering agencies adequately supervise and appropriately train project personnel. (See p. 13.)

--The Department of Agriculture make a concerted effort to implement, for all Indian participants in the family food assistance programs, nutrition education programs that recognize Indian living conditions and customs.

Where the food distribution program may be continued, such programs should emphasize how to best use and properly supplement the donated foods. In those areas having or switching to the food stamp program, the Indians should be instructed how to obtain adequate diets with food stamps. (See p. 18.)

AGENCY ACTIONS
AND UNRESOLVED ISSUES

Food and Nutrition Service officials generally agreed with the facts in the report. (See p. 21.)

MATTERS FOR CONSIDERATION
BY THE COMMITTEE

It is questionable whether, pursuant to the Agriculture and Consumer Protection Act of 1973, the food stamp program can be implemented and become fully effective on the South Dakota Indian reservations by July 1, 1974, because:

--State officials told GAO in February 1974 that they had not decided (1) how the State's Indians would be brought into the program and (2) the outreach and education effort necessary to tell the Indians

potentially eligible for the food stamp program about its benefits and how it operates.

--An educational program to teach the Indians the skill they need in buying and preparing food obtained with food stamps had not been planned as of February 1974. An effective program will

require considerable planning.

--Some Indians have had difficulty in getting to food distribution points; it may be equally or more difficult for some of them to get to adequate grocery stores to use food stamps. (See p. 22.)

CHAPTER 1

INTRODUCTION

At the request of the Chairman of the Senate Select Committee on Nutrition and Human Needs, and as subsequently agreed with his office, we have reviewed certain aspects of

- the food stamp program (FSP) as it relates to Indians on selected reservations in Sandoval County, New Mexico, and
- FSP and the food distribution program (FDP) as they relate to Indians on the Cheyenne River, Pine Ridge, and Rosebud Reservations in South Dakota.

The Food and Nutrition Service, Department of Agriculture, administers both programs nationally, and State agencies, through agreements with the Service, administer them locally. Through an agreement with South Dakota, the Aberdeen area office of the Bureau of Indian Affairs, Department of the Interior, administers FDP on the South Dakota reservations.

The Chairman asked that we give special attention to (1) the efficiency of State agency program administration as opposed to possible tribal government administration and (2) questions of whether, due to the unique problems involved, either program by itself was capable of providing nutritionally adequate diets or whether a combination of the two programs or a third, alternative program was called for on the reservations.

At the time of our review, all counties and reservations in New Mexico participated only in FSP. In South Dakota, where both programs operated, 62 of the 67 counties--including 7 of the 9 counties in which the reservations we visited are located--and 1 of the 7 Indian reservations participated in FSP. The other five counties and six reservations, including the three reservations covered in our review, participated in FDP. Federal law (7 U.S.C. 2013(b)) provides that a household can participate in only one program.

During our review the Agriculture and Consumer Protection Act of 1973 (Public Law 93-86, 87 Stat. 221) was enacted, which will impact on both programs. The act provides that (1) by July 1, 1974, FSP replace FDP in all political subdivisions of participating States, unless such replacement can be demonstrated to be impossible or impracticable, (2) the face value of the food stamp coupon allotment be adjusted semiannually to reflect changes

in food prices, and (3) food stamps be issued no fewer than 2 days a month. The act also authorized the Department of Agriculture to continue buying commodities for FDP until July 1, 1974, regardless of price limits in other laws. Pending legislation (see p. 7) would extend this buying authority beyond July 1, 1974.

In January 1974 South Dakota requested that the Department designate the five counties still on FDP as food stamp project areas. In view of the 1973 act and the pending legislation, we are including (see p. 22) our observations on factors which may impede effective implementation of FSP by July 1, 1974, on the South Dakota reservations we visited.

SCOPE OF REVIEW

We reviewed applicable legislation; background information on the programs; pertinent program records; and selected Department of Agriculture program review reports, including those of the Office of the Inspector General. We interviewed Service headquarters and field officials; field officials of the Bureau and the Department of Health, Education, and Welfare's Indian Health Service; State and local program officials; representatives of certain community organizations providing program-related services; and tribal officials and families on the three South Dakota reservations and in a Navajo community and the Santo Domingo, San Felipe, Zia, and Jemez Pueblos in Sandoval County.

OPERATION OF THE PROGRAMS

FSP, authorized by the Food Stamp Act of 1964, as amended (7 U.S.C. 2011), is designed to help low-income persons and families obtain more nutritionally adequate diets by enabling them to buy subsidized food through regular grocery stores. Participating households spend money they would normally spend for food to buy food stamps of higher monetary value. The value of the stamps and their prices are based on household size and income. Households with no income get free stamps.

The stamps are sold or issued at points the State or local administering agency designates. Some States mail the stamps to participants. Stamps may be used to purchase food at any grocery store which has been approved by the Service.

As authorized by section 32 of the act of August 24, 1935, as amended (7 U.S.C. 612c), and section 416 of the Agricultural Act of 1949 (7 U.S.C. 1431), food is distributed under FDP directly to

needy persons and families to supplement their food purchases to help them maintain balanced diets. Generally the food is distributed monthly at designated points.

PENDING LEGISLATION

Several bills¹ related to food assistance programs have been introduced in the 93d Congress, one or more of which would:

- Allow Indian tribes to administer their own FSPs according to regulations issued by the Secretary of Agriculture.
- Authorize the Department to pay a larger part of FSP administrative costs.
- Extend the Department's authority to purchase agricultural commodities for food assistance programs, including those serving Indian reservations not requesting FSPs.

¹Among these bills are Senate bills 2871 and 3235 and House bills 13111, 13168, 13171, 13172, 13238, 13306, 13380, 13417, 13734, and 13735.

CHAPTER 2

STATE VERSUS TRIBAL GOVERNMENT

ADMINISTRATION OF FSP

State agency administration of FSP in the New Mexico and South Dakota counties we visited was generally satisfactory. We found no evidence that tribal government administration, which is not now authorized by the enabling legislation, would be more efficient or effective than State agency administration. In fact, if tribal governments were authorized to administer FSP on the reservations, FSP administrative costs would likely increase because additional administrative units would be established and existing State and county-level units would probably be kept to serve non-Indian participants.

For example, if each Sandoval County tribe were to administer its own FSP, there would be eight separate programs in Sandoval County alone: the existing State-administered program and seven Indian programs serving populations ranging from 200 to 1,700.

The Food Stamp Act requires that a State government agency, designated by the Secretary of Agriculture, administer FSP. Service regulations (7 CFR 270) provide that the designated agency be the State agency that administers federally aided public assistance programs. Neither the act nor the regulations authorize tribal governments to administer the program. There is no assurance that changing the law and the regulations to permit tribal governments to administer FSP on Indian reservations would increase program efficiency or effectiveness.

We concentrated our review of the effectiveness of FSP administration at the State and local levels on three functions--outreach, eligibility certification, and stamp issuance. Although we noted some weaknesses, overall administration was generally satisfactory.

In April 1972 the New Mexico State agency, in cooperation with various organizations, began a Statewide program to provide Indians with outreach services, such as information on FSP and help in applying for stamps. In Sandoval County, tribal officials told us that several organizations were actively providing outreach services. Representatives of four of these organizations said that they told Indians about FSP, gave them financial assistance in emergencies, helped them apply for food stamps, and instructed them on preparing foods.

According to a May 1973 State report, 80 percent of New Mexico's poverty-level households participated in FSP and, during the outreach program's first year, FSP participation in those areas of the State participating in FSP the entire time increased from about 33,200 cases to about 41,000 cases.

The South Dakota State welfare agency's FSP operations plan provided for outreach, but the agency had not hired a coordinator and its outreach efforts were limited. At the three South Dakota reservations we visited, we identified only one organization which provided outreach services to the Indians in one community. According to State officials, outreach to promote FSP among the Indians in the State had been limited because most Indians participated in FDP.

Although we noted no major deficiencies in the FSP certification function in the two States, there were several instances in which the certifiers had not made the required verifications of certain items, such as income. State and local officials told us that they would instruct the certifiers to make the verifications.

In South Dakota a lack of coordination between the State (FSP) and the Bureau (FDP) certifying offices had resulted in some Indian families on one reservation being certified for and participating in both FSP and FDP. After we brought this matter to the attention of State and Bureau officials, they issued instructions to provide for coordination between the Bureau and State certifiers.

Six of the seven FSP counties within the South Dakota reservations we visited had one certification point each. Participants in the other county were certified at the county seat of an adjoining county. Distances within these counties to certification points ranged from walking distance up to about 60 miles.

Although we noted no major deficiencies in the issuance function, the number of stamp issuance locations and the frequency of issuance dates sometimes varied. In Sandoval County, food stamps were issued at the county seat, at four of the county's seven Indian pueblos, and at five other field locations. At two field locations, stamps were issued twice monthly; at the pueblos and the other field locations, they were issued monthly. At the county seat, stamps were issued on the working days--about 10 each month--when issuance personnel were not at the pueblos or at other field locations. Distances to the issuance locations ranged from walking distance to about 35 miles. Sandoval County did not issue stamps by mail.

The following table shows, for the seven food stamp counties within the three South Dakota reservations, the number of issuance locations and the number of days they were open.

<u>County</u>	<u>Number of locations</u>	<u>Number of days open each month</u>
1	a ₀	-
2	1	All but 2 working days
3	1	2 (semi-monthly)
4	1	b ₁
5	1	All working days
6	3	2 (semi-monthly at 1 location) 1 (at other 2 locations)
7	6	2 (semi-monthly at 1 location) 1 (at other 5 locations)

^aParticipants had to go to an adjoining nonreservation county's one issuance location which was open on 3 consecutive days each month. According to State officials this was to change to semi-monthly in February 1974.

^bAccording to State officials this was to change to semi-monthly in February 1974.

Within those counties having only one issuance location, distances to the issuance locations ranged from walking distance up to 60 miles. South Dakota did not issue stamps by mail at the time of our review.

Tribal and Bureau officials indicated that the issuance days did not always coincide with the Indians' receipt of income. Tribal officials also said that some people had problems getting transportation to the issuance locations.

CONCLUSIONS

State agency administration of FSP in the counties we visited was generally satisfactory, although some improvements were needed to increase South Dakota's outreach efforts and to make stamps available for purchase more frequently and at more locations.

The 1973 legislation, which requires that stamps be issued no less than 2 days a month, may result in more convenience to Indians purchasing stamps at locations where stamps had been issued once a month, but the limited number of issuance locations may minimize the benefits of the additional number of sale days. Because of the travel distances, the State should consider mailing food stamps to participants.

Even if the law and regulations were changed to permit tribal governments, rather than States, to administer FSP on reservations, it is unlikely that it would be economical for each tribe to have its own program because of the relatively small number of participants at some reservations and because existing State and county-level administering units would probably have to be kept to carry out the necessary program functions for non-Indians.

RECOMMENDATIONS TO THE SECRETARY OF AGRICULTURE

We recommend that, if reservations now participating in FDP are to be brought into FSP, the Service, in cooperation with State administering agencies, make a concerted effort, before FSP starts, to inform potentially eligible Indians of its benefits and how it operates.

We recommend also that the Service work with the State administering agencies, particularly in South Dakota, to assess the need for more and better located issuance points and the feasibility of mailing stamps to participants.

STATE AND BUREAU FIELD OFFICIALS' COMMENTS

South Dakota State welfare agency officials generally agreed with our conclusions but said that they did not have funds available to implement an outreach plan or to increase stamp issuance locations. The Bureau's Aberdeen area officials said that they believed that the Indians had received free commodities for so many years that having to pay the recipients' shares of the food stamp cost will be particularly unpopular. A State welfare agency official told us in February 1974 that the location of certification and issuance points in the five counties which were to be switched from FDP to FSP had not been decided.

CHAPTER 3

ADMINISTRATION OF FDP

The State Department of Public Instruction was responsible to the Service for FDP in South Dakota and carried out some program functions, but the Bureau's area office and the tribal governments were heavily involved in administering FDP on the reservations. Tribal officials, whom we interviewed at the three reservations before enactment of the 1973 legislation under which FSP would replace FDP, expressed little interest in assuming complete responsibility for administering FDP.

At the time of our review, the State agency's participation in FDP for Indians was limited to ordering food, providing general supervision, and reporting program results to the Service. Because of limited staff and funding and because of supervision, certification, and recordkeeping problems in administering FDP on South Dakota's reservations, the State agency had entered into an agreement with the Bureau's Aberdeen area office in June 1963 whereby the area office assumed responsibility for carrying out FDP on the reservations. The Bureau was responsible for certifying applicants' eligibility. The tribes were actively involved in transporting, warehousing, and distributing the commodities to needy persons and were helping to finance some of the program's administrative expenses.

The State agency did not have an outreach program to publicize FDP. An agency official told us that the agency relied on the Service's regional office press releases to publicize the program. Our discussions with Bureau certifying personnel and Indian families, an FDP participation rate of almost 70 percent on the three reservations, and the fact that commodities had been distributed on the reservations since the late 1800s indicated that, despite the lack of outreach efforts, the Indians were generally aware of FDP.

Our review of Bureau and tribal administrative functions identified weaknesses in supervision, certification, and record-keeping--the same areas the State agency cited in turning FDP administration over to the Bureau in 1963. Department of Agriculture program review reports issued in 1969 and 1972 on FDP in South Dakota also disclosed some of the same types of weaknesses.

Available information and our discussions with Bureau officials showed that, contrary to the agreement with the State agency, Bureau personnel had not reviewed operations at least once every 12 months,

or maintained accurate and proper records, or conducted workshops on the administrative and operational phases of the program. A Bureau area official told us that the Bureau had not been able to carry out these functions because it did not have an adequate number of employees. He said that the Bureau did not have supervisory employees assigned full time to the program.

Our examination of FDP case files for 64 households on the three reservations showed that, contrary to the agreement with the State agency, the certifiers had not reverified the continued FDP eligibility in 30 cases and had not verified income and liquid assets in 25 and 39 cases, respectively.

We reviewed warehouse inventory records and reports and identified variances between the records and actual inventories and numerous mathematical errors. One warehouse employee attributed these deficiencies to a lack of training; two attributed deficiencies to a lack of written instructions on accounting procedures. State agency officials said that instruction in mathematics was particularly needed.

Tribal officials on the three reservations expressed little interest in the tribes' assuming complete responsibility for FDP. One official said that her tribe's relationship with the State was very good. Officials at the other reservations indicated that, before assuming additional responsibility, they would have to carefully consider the possible additional cost to the tribes.

CONCLUSIONS

Bureau and tribal government administration of FDP on the South Dakota reservations had not solved some of the supervision, certification, and recordkeeping problems that the State agency had encountered when it administered the program. The deficiencies might have been minimized had the Bureau provided better training and closer supervision.

RECOMMENDATION TO THE SECRETARY OF AGRICULTURE

Should FDP projects be continued beyond July 1, 1974, the Service should insure that the administering agencies adequately supervise and appropriately train project personnel.

STATE AND BUREAU FIELD OFFICIALS' COMMENTS

State agency and Bureau field officials generally agreed with our overall conclusions but said that they did not have funds or positions available to take corrective action.

Bureau officials said that they had originally assumed responsibility for the reservations' FDP programs without receiving staffing or funding to carry out that responsibility. They said that the alternative would have been no food program. Both the State agency and Bureau officials said that a turnover of personnel at the reservations, which they attributed, in part, to changes in tribal leadership, had added to the problems we cited. For example, a Bureau official told us that, after our fieldwork, the FDP certifier at the Cheyenne River Reservation left, the Rosebud Reservation certifier's position has been filled twice, and the Pine Ridge Reservation's one FDP certifier was detailed to non-food-program work.

CHAPTER 4

CAPABILITY OF FOOD PROGRAMS

TO PROVIDE ADEQUATE DIETS

We found no problems unique to the Indians that would prevent them from obtaining adequate diets under either program. However:

- Some South Dakota Indian families relied primarily on FDP for their diets, although FDP, by itself, was not intended to provide adequate diets.
- FSP is designed to enable participants to purchase nutritionally adequate diets, but participants need skill in buying and preparing foods obtained with food stamps.
- Nutrition education, which participants need to obtain the full benefits from either program, was limited on the South Dakota reservations.
- For participants to receive full benefits from FSP, they must have accessible, adequate grocery stores.

SOME SOUTH DAKOTA INDIAN FAMILIES RELIED PRIMARILY ON FDP FOR THEIR DIETS

Service officials told us that, as provided in section 416 of the Agricultural Act of 1949, FDP was intended to help low-income persons maintain balanced diets by using donated foods to supplement their own food purchases. Our discussions with tribal officials on the three South Dakota reservations, however, indicated that some Indian families relied almost entirely on FDP for their diets.

At the time of our review, the foods distributed monthly to recipients on the reservations generally included canned butter, milk (evaporated and dry), egg mix, flour, beans, rice, canned meat, instant potatoes, juice, and canned vegetables and fruits. According to information compiled by the Service, such foods do not provide the recommended daily dietary allowances of nutrients and calories published by the National Academy of Sciences. For example, FDP items distributed in South Dakota during the first 6 months of fiscal year 1973 provided only 38 percent of the recommended allowance of calcium, 60 percent of the iron, and 70 percent of the protein.

A nutritionist at the Indian Health Service's Aberdeen area office told us that FDP food items were high in carbohydrates and

fats and low in vitamins and minerals. The nutritionist said also that FDP did not meet the dietary requirements of Indians requiring special diets, such as diabetics. Statistics show that the death rate for diabetes in the Indian Health Service's Aberdeen area was high compared with the national rate.

Although FDP, by itself, was not intended to, and did not provide adequate diets, tribal officials at the Pine Ridge and Rosebud Reservations told us that some of the Indian families relied almost entirely on the FDP for their diets. A tribal council member at the Cheyenne River Reservation told us that, in the case of the unemployed and their families, FDP commodities may have constituted the only food they ate because they did not have the money to buy anything else.

Our discussions with various officials and nutritionists indicated that nutrition education programs on the three reservations were limited and fragmented and that the Indians did not know how to best use the food items FDP provided and how to properly supplement their diets. A physician on the Rosebud Reservation testified before the Senate Select Committee on Nutrition and Human Needs that the Indians' inadequate diets were reflected in their medical problems and that the incidences of gall bladder diseases and obesity in the Indian adults was alarming.

PARTICIPANTS NEED SKILL IN BUYING AND
PREPARING FOODS TO OBTAIN ADEQUATE DIETS
UNDER FSP

According to the Service, FSP is designed to provide recipients with enough stamps to buy nutritionally adequate diets, if they follow the Department's economy food plan. The plan is a guide for estimating the quantities of 11 food groups that, together, provide nutritionally good diets for persons of different ages and sexes. According to a Department official and a Department publication, however, many families do not follow the plan because homemakers do not have the necessary skill and interest in buying and preparing food or the necessary food preparation equipment. Also preparing the food is likely to require more time than many homemakers wish to spend.

In those counties within the three South Dakota reservations we visited, we found only one organization involved in nutrition education for Indians participating in FSP. The organization's supervisor told us that, in her opinion, few Indian families participated in FSP because they were poor money managers. She said

that, for this reason, one of her aides, who was working with Indians on nutrition education and housekeeping, also covered money management matters.

In New Mexico nutrition education of food stamp recipients was a part of the State agency's outreach plan and had been implemented with the cooperation of governmental and community organizations. The organizations helped develop the outreach action plans, distributed Service-printed nutrition material, and provided nutrition counseling during home visits to food stamp recipients.

On the basis of a nationwide study, Department nutritionists generally have concluded that expanded nutrition education is needed among all economic levels of the U.S. population but especially among those with limited food budgets. Also a nutritionist with the Indian Health Service's Aberdeen area office told us that there was a definite need for nutrition education programs for the Indians, whether they participated in FDP or FSP.

The nutritionist said that such programs should recognize the Indians' living conditions and customs. She said also that many Indians did not have measuring utensils and other cooking equipment that recipes assume are available, that instruction in drying foods might be more practical than instruction in canning foods, and that more low-cost recipes that recognize the diet restrictions of those having certain diseases were needed.

PARTICIPANTS NEED ACCESSIBLE, ADEQUATE GROCERY STORES TO OBTAIN FSP BENEFITS

Accessible grocery stores and adequate food quantities and varieties can affect FSP participants' ability to obtain adequate nutritional diets. Distances from homes to grocery stores on the reservations we visited ranged from walking distances to 30 miles.

According to our interviews with 22 Indian families from two communities in Sandoval County, all 22 families usually shopped in towns and cities which had adequate grocery stores and which were within 30 miles of their communities.

Tribal and Bureau officials in South Dakota told us that among the problems encountered when FSP was tried unsuccessfully on the Cheyenne River Reservation from December 1968 to August 1969 were the lack of stores with adequate food quantities and varieties on the reservation and the lack of transportation for many families.

On two of the South Dakota reservations, 54 of the 129 family representatives we interviewed told us that their families had no personal transportation and that some of them paid others to transport them to and from the grocery stores. Public transportation was not available.

We did not determine the adequacy of the grocery stores on the reservations but, according to Service and Bureau officials, there were grocery stores or trading posts in 12 communities on the Cheyenne River Reservation, in 14 communities on the Pine Ridge Reservation, and in 25 communities on the Rosebud Reservation. About three-fourths of those communities on the Cheyenne River Reservation, two-thirds of those on the Pine Ridge Reservation, and one-third of those on the Rosebud Reservation had FDP distribution points in or near them. Service officials told us that their experience had been generally that, when a project area changed from FDP to FSP, grocery stores had responded quickly to the increased demand, usually within a few days.

CONCLUSIONS

FDP is not designed to provide recipients with adequate nutritional diets and offers little variety in the food items they receive from month to month. The Indian families that rely solely on FDP for their diets would not have nutritionally adequate diets. The nutritional adequacy of the diets of other participants would depend on their other food purchases.

FSP is potentially capable of providing Indians with nutritionally adequate diets, provided the recipients have access to adequate grocery stores, that they have adequate knowledge of nutrition, and that they apply this knowledge when purchasing and preparing food.

No alternative food assistance program would insure that participants eat nutritionally adequate diets. For any food assistance program to be effective, participants must know what constitutes an adequate nutritional diet and must apply this knowledge. On the reservations we visited, nutrition education was needed.

RECOMMENDATION TO THE SECRETARY OF AGRICULTURE

We recommend that the Department make a concerted effort to implement, for all Indian participants in the family food assistance programs, nutrition education programs that recognize Indian living conditions and customs. Where FDP may be continued, such programs should emphasize how to best use and properly supplement the donated foods. In those areas having or switching to FSP, the Indians should be instructed how to obtain adequate diets with food stamps.

STATE, BUREAU, AND INDIAN HEALTH SERVICE
OFFICIALS' COMMENTS

South Dakota officials responsible for FSP and FDP, the Bureau's Aberdeen area office officials, and an Indian Health Service Aberdeen area office nutritionist all agreed that nutrition education was urgently needed on the South Dakota reservations. There was some uncertainty, however, as to who might have the best access to the individual Indian families. The officials suggested additional Indian Health Service community health representatives or nutrition aides under the expanded food and nutrition education program administered by the Department of Agriculture's Extension Service.

State FDP officials told us that, although they were uncertain whether the tribes would participate in FSP, they were compiling information on Indian preferences for FSP or FDP, population density by community, distances to adequate grocery stores, and prices charged by various local grocery stores for foods the Indians were receiving under FDP.

CHAPTER 5

INDIAN PREFERENCE FOR

FOOD PROGRAMS WAS MIXED

To determine preference for the two food programs, we interviewed representatives of 22 Indian families in Sandoval County, all of whom were in FSP, and of 195 Indian families on the three reservations in South Dakota, all of whom were in FDP. All the Sandoval County interviewees preferred FSP. About 55 percent of the South Dakota interviewees told us that they preferred, and wished to remain on, FDP; about 35 percent said they preferred FSP. The remainder either preferred having both programs continue or did not indicate their preferences.

The principal reason given by the South Dakota interviewees who told us that they wanted to remain on FDP was that they could not afford the stamps. The principal reason given by those who wanted to switch to FSP was the lack of variety in the food items received under FDP.

CHAPTER 6

SERVICE OFFICIALS' COMMENTS

Service officials generally agreed with the facts in this report. They told us that it has been their experience that efforts to reach and certify potentially eligible persons more than 90 days in advance of a switchover from FDP to FSP were wasted, and they believed that a switchover on the reservations could be done by July 1, 1974. They said that, for a State to delay the switchover to FSP beyond July 1, 1974, the date specified by the Agriculture and Consumer Protection Act of 1973, it would have to furnish information to the Service showing that the switchover was impossible.

The officials said that the uncertainty of tribal governments' participating in FSP was due to uncertainty as to whether pending legislation (see p. 7) would be enacted. The officials said, however, that they had no legal alternative but to proceed with the switchover to FSP.

Service officials also said that the Service would continue buying commodities until June 30, 1974, when its special buying authority under the 1973 legislation would expire, so that food would be available during the first few months of fiscal year 1975 to feed FDP participants in areas that encountered problems in switching. They said that funds would still be available to buy commodities after July 1, 1974, but that they were not certain that they would be able to use the funds unless the Service received special buying authority.

Service officials said that all the poor needed nutrition education and that nutrition education for Indians would have to come as a part of a general upgrading of nutrition education. They said also that there was no national commitment to such a program and that, in the meantime, the Service must rely on the Extension Service to provide nutrition education within its limited resources.

CHAPTER 7

FACTORS WHICH MAY IMPEDE EFFECTIVE IMPLEMENTATION

OF FSP ON INDIAN RESERVATIONS BY JULY 1, 1974

It is questionable whether, in accordance with the Agriculture and Consumer Protection Act of 1973, FSP can be implemented and become fully effective on the South Dakota Indian reservations by July 1, 1974, because:

- State officials indicated to us in February 1974 that the State had not decided (1) how the State's Indians would be brought into FSP and (2) the outreach and education effort necessary to tell the Indians potentially eligible for FSP about its benefits and how it operates.
- An educational program to teach the Indians the skill they need in buying and preparing food obtained with food stamps had not been planned as of February 1974. It may take many months to plan and undertake an effective program to teach Indians the skills they need, particularly those Indians who have relied primarily on FDP for their diets. Indian Health Service and tribal officials told us that the free food commodities had become a tradition with many Indian families and that switching to FSP would require an extensive educational program to teach the Indians how to select nutritious diets with limited resources.
- Some Indians have had difficulty in getting to food distribution points; it may be equally or more difficult for some of them to get to adequate grocery stores to use food stamps. Some communities having FDP distribution points do not have grocery stores. When FDP is discontinued, some Indians being served by these distribution points will probably have more difficulty in reaching the nearest grocery stores than they did in reaching distribution points. For example, as shown in the appendix, about 535 Indians in the southwestern corner of the Cheyenne River Reservation were being served by two distribution points that did not have grocery stores nearby. The closest grocery store-trading post to these distribution points was about 30 miles away.