Tribal Food Assistance

A Comparison of the Food Distribution Program on Indian Reservations (FDPIR) and the Supplemental Nutrition Assistance Program (SNAP)

Contractor and Cooperator Report No. 58
December 2009

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Abstract

The Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program (FSP), provides low-income households with electronic benefits that can be used to purchase food in grocery stores and supermarkets. People residing on Indian reservations, and households with American Indians and Alaska Natives residing off but near reservations, or in certain areas of Oklahoma, may have a food assistance option besides SNAP/FSP—the Food Distribution Program on Indian Reservations (FDPIR), which provides a monthly package of commodities. FDPIR was established, in part, to address concerns about the distances some reservation residents would have to travel to SNAP/FSP offices and grocery stores in order to obtain and use food stamps. Eligibility requirements for FDPIR are similar, but not identical, to those for SNAP/FSP. FDPIR households cannot participate in both FDPIR and SNAP/FSP in the same month, so those who are eligible for both programs must choose between them.

This report combines findings from site visits to seven reservations that participate in FDPIR with analysis of administrative and survey data to compare the two programs with regard to eligibility, participation, administration, and possible effects on health and nutrition. Results show that FDPIR benefits some American Indian and Alaska Native households that are not eligible for SNAP/FSP. Simulation estimates suggest that in an average month, 13 percent of households eligible for FDPIR would not be eligible for SNAP/FSP. Another 41 percent of the households eligible for FDPIR are eligible for SNAP/FSP but would receive FDPIR commodities with retail value above the SNAP/FSP benefit. The remaining 46 percent of households eligible for FDPIR are eligible for SNAP/FSP and would receive more benefits from that program than from FDPIR. What determines the choice between programs, among people who have a choice? The size of the benefit for which the household would qualify is certainly a factor, but administrators and participants suggest that the ease of enrollment, cultural compatibility, choice in food selection, and access to grocery stores also appear to affect participation decisions.

This study was conducted by the Urban Institute under a cooperative research contract with USDA's Economic Research Service (ERS) Food and Nutrition Assistance Research Program (FANRP): contract number 59-5000-6-0105 (ERS project representative: T. Alexander Majchrowicz). The views expressed are those of the authors and not necessarily those of ERS or USDA. Information presented here is derived in part from the Transfer Income Model, Version 3 (TRIM3) and associated databases. TRIM3 requires users to input assumptions and/or interpretations about economic behavior and the rules governing Federal programs. Therefore, the conclusions presented here are attributable only to the authors of this report.

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EXECUTIVE SUMMARY

The Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program (FSP), provides low-income households with electronic benefits that can be used to purchase food in grocery stores and supermarkets. People residing on Indian reservations, and households with American Indians and Alaska Natives residing off but near reservations, or in certain areas of Oklahoma, may have a food assistance option besides SNAP/FSP—the Food Distribution Program on Indian Reservations (FDPIR), which provides a monthly package of commodities. FDPIR was established, in part, to address concerns about the distances some reservation residents would have to travel to SNAP/FSP offices and grocery stores in order to obtain and use food stamps. Eligibility requirements for FDPIR are similar, but not identical, to those for SNAP/FSP. FDPIR households cannot participate in both FDPIR and SNAP/FSP in the same month, so those who are eligible for both programs must choose between them.

This report combines findings from site visits to seven reservations that participate in FDPIR with analysis of administrative and survey data to compare the two programs with regard to eligibility, participation, administration, and possible effects on health and nutrition. The information and analysis in the report are meant to help the USDA, Congress, and tribal governments understand the contributions and limitations of each program, and how they do or do not work together and with other programs on the reservations.

Study Objectives

The study addressed four objectives, all comparative:

1) **Compare eligibility in FDPIR and SNAP/FSP**. How important are the differences in eligibility requirements for the two programs? How much do the eligible populations for the two programs overlap? Who, on or near the reservations, is eligible for FDPIR but not SNAP/FSP, and who is eligible for SNAP/FSP but not FDPIR? To what extent has the decline in FDPIR enrollment—or the more recent uptick—resulted from changes in the number of people who are eligible to receive commodities?

2) **Compare participation in FDPIR and SNAP/FSP**. How do people who are eligible for both programs make the choice? Do calculations of expected benefits dominate decisionmaking? How common is it for participants to switch back and forth between FDPIR and SNAP/FSP, in response to their circumstances that month? To what extent have recent enrollment trends resulted from changes in participation among people eligible for both programs?

3) **Compare administration of FDPIR and SNAP/FSP**. How do FDPIR programs conduct outreach, determine eligibility, and order, store, and distribute food? How much do FDPIR practices differ across regions, states, or reservations? What does each program do to provide nutrition education or promote native foods? Are FDPIR and SNAP/FSP colocated, or otherwise coordinated, with each other, with other food assistance programs such as WIC,

and with non-USDA programs such as IHS, tribal TANF, Indian housing, and the economic development efforts of the Bureau of Indian Affairs?

4) **Compare possible effects**. Are there systematic differences in food security, nutrition, and nutrition-related health conditions (such as obesity and diabetes) between participants in FDPIR and participants in SNAP/FSP, or between American Indians who live where FDPIR is available and those who live where it is not?

The study provides a foundation, and suggests some topics, for future research on the effects of participation in FDPIR and SNAP/FSP for American Indians living on or near reservations. These future research projects might include collection of new data or random assignment experiments, both of which were beyond the boundaries of the research for this report.

Research Methods

Our methods combined qualitative and quantitative approaches. The qualitative work included telephone conferences with national and regional administrators and site visits to FDPIR programs. The quantitative analysis used a microsimulation model to compare SNAP/FSP and FDPIR eligibility using baseline and alternative scenarios.

Qualitative analysis for the project was based on site visits to seven tribal food distribution programs. The site visits primarily addressed the third project goal of comparing the administration of FDPIR and SNAP/FSP, but we also obtained valuable information about eligibility, benefits, and potential health effects. The site visits included focus groups with FDPIR participants and interviews with administrators and staff from FDPIR, other tribal programs, and SNAP/FSP.

Site selection criteria included geographic variables, economic factors, and program characteristics. In addition, we considered recommendations for sites offered by FDPIR regional staff and representatives of the National Association of Food Distribution Programs on Indian Reservations (NAFDPIR). Site selection recommendations from FNS regional staff and NAFDPIR representatives focused on obtaining a diversity of program delivery models and proximity to other tribes in order to maximize the number and range of programs that could be included in site visits.

The four programs we visited as primary sites are shown below. Three of the four site visits included more limited visits to nearby secondary sites, shown in parentheses.

- Lower Brule Sioux (Crow Creek Sioux), South Dakota, Mountain Plains Region
- Chickasaw Nation (Choctaw Nation), Oklahoma, Southwest Region
- Fond du Lac Band of Lake Superior Chippewa (Mille Lacs Band of Ojibwe), Minnesota, Midwest Region
- Sherwood Valley Band of Pomo Indians, California, Western Region

To understand patterns of eligibility and participation in SNAP/FSP and FDPIR, we used data from the TRansfer Income Module, version 3 (TRIM3), a microsimulation model of U.S.

transfer programs and taxes. Input data come from the March 2006 Current Population Survey Annual Social and Economic Supplement (CPS-ASEC), which provides rich data on program participation, work activity, and demographic characteristics in the preceding calendar year. TRIM3 provides the capacity to model "what-if" policy scenarios: the program rules can be set to other values to model eligibility and participation in alternative simulations using the same survey data. We took advantage of this capacity by using TRIM3 SNAP/FSP module to model eligibility for FDPIR as well for SNAP/FSP. We changed the rules for the 2005 SNAP/FSP simulation (the most recent available) to capture most of the differences between the two programs as of that year.

Program Background

Between 1778 and 1871, the United States negotiated hundreds of treaties with American Indian tribes. Typically, the tribe agreed to cede land and cease hostilities. In exchange, the United States often promised to protect a reservation from further incursions by non-Indians. The U.S. also promised to provide education (teachers and schools), health care (doctors and nurses), and, in some cases, food "rations" to make up for the loss of hunting, fishing, and agricultural areas. Not all tribes were parties to such treaties; no treaties were ratified with any of the California tribes, for example. But some members of the "treaty tribes" view FDPIR as the continuation of the treaty-based rations.

The Food Stamp Act of 1977, which gave SNAP/FSP its current form, established FDPIR as an explicit exception to the general policy of providing food assistance through vouchers rather than commodity distribution. Under the Food Stamp Act and its successor, the Food and Nutrition Act of 2008, an Indian Tribal Organization (ITO), which can be the governing body of a single tribe or an intertribal organization, decides whether FDPIR is available. Either the ITO or the state can administer the program. FDPIR, like SNAP/FSP, is administered at the national level by the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS).

FDPIR offers a wide variety of nutritious foods from which program participants may select, including vegetables, fruits, juices, cereals, grains (including whole grain products), pasta, vegetable oil, meats, poultry, fish, and other proteins such as canned and dry beans, peanut butter, and egg mix. FDPIR provides a selection of canned fruits and vegetables, but also offers ITOs and State agencies the option to provide fresh fruits and vegetables to program participants. FNS has reduced the fat, sugar and sodium levels in many of the products offered, and is offering more frozen meats in lieu of canned meats. Packaging and labeling for many products more closely resembles commercial products, and provides more nutrition information. Some programs, such as those of the Chickasaw and Choctaw Nations in Oklahoma, now provide foods in a store-like setting that allows participants to choose among the available foods on the shelves. FDPIR also promotes healthy eating through nutrition education activities such as cooking demonstrations and recipes for preparation of FDPIR foods.

FDPIR and SNAP/FSP are both widely used in reservation areas. FDPIR and SNAP/FSP were reauthorized together in 2002 and again in 2008. Overall, the eligibility requirements of the two programs are similar but not identical. FDPIR provides benefits in kind, while SNAP/FSP

provides electronic benefits that are almost like cash, but can only be used for food. Table ES-1 compares geographic coverage, benefits, and tribal administration in the two programs. SNAP/FSP is offered in all 50 states, the District of Columbia, Guam, and the Virgin Islands. FDPIR currently operates in 23 states, mostly in the West (Figure ES-1). Forty-three percent of the U.S. general population, including 69 percent of people who identify themselves as American Indian or Alaska Native, live in these 23 states.

With respect to participation, from FY 1996 to FY 1999, FDPIR enrollment grew and SNAP/FSP enrollment fell, overall and among the people most likely to have access to FDPIR. SNAP/FSP enrollment has grown more than 80 percent since it bottomed out in FY 2000. Between FY 1999 and FY 2007, enrollment in FDPIR dropped 33 percent. The two programs, however, have grown together in the current recession. FDPIR enrollment rebounded with a 4 percent increase in FY 2008, and increased further in the first four months of FY 2009 (October 2008 to January 2009). SNAP/FSP enrollment during the same period has reached an all-time high of more than 31 million participants (Figure ES-2).

Key Findings

Eligibility

To participate in FDPIR, one must live on a reservation, or live outside a reservation in an approved near area, or in an approved service area in Oklahoma, where reservation boundaries generally do not exist as in other states. For families that live in an approved near area outside a reservation or in an approved service area in Oklahoma, at least one family member must be an enrolled member of a federally recognized tribe. A further limit on access to FDPIR is that residents of communities with populations of 10,000 or more cannot participate in the program unless that community is on a reservation, was already participating in the program when its population grew above 10,000, or has a waiver from FNS. SNAP/FSP has no such restrictions regarding location or tribal affiliation, but in other respects SNAP/FSP requirements are stricter—and more complicated—than those for FDPIR.

Income limits for the two programs differ with respect to income tests and deductions for medical and shelter expenses. Unlike SNAP/FSP, FDPIR does not employ a gross income test, so the eligibility of applicant FDPIR households is determined solely on their net monthly income. FDPIR and SNAP/FSP use the same basis for net monthly income eligibility, 100 percent of the Federal Poverty Guidelines. Some tribes draw on income from gaming, sale or leasing of resources such as timber and oil, or other economic enterprises to distribute monthly, quarterly, or annual per capita payments to their members. Federal regulations, based on language in statutes and treaties, exclude per capita payments from some of the nongaming revenue streams in determining eligibility for food assistance. FDPIR and SNAP/FSP handle the per capita payments that are not excluded in different ways. FDPIR counts the per capitas as unearned income in the month they are distributed. On some reservations, large numbers of people lose their eligibility for food distribution in those particular months. SNAP/FSP, in contrast, annualizes per capita payments, spreading their value over all months in the year. This avoids disqualifying large numbers of participants at the same time. However, the per capita

payments may push some households that are otherwise close to the SNAP/FSP income limits above those limits in *all* months.

To understand the impact of differences in rules regarding income, assets, Able Bodied Adults Without Dependents (ABAWDs), and service areas, we modeled both programs in TRIM3. The primary universe for this analysis consisted of persons living in households containing at least one person identifying as American Indian or Alaska Native, in locations where FDPIR could be available. Analysis with two populations that are defined more narrowly produced similar results.

Simulation of average monthly eligibility for FDPIR and SNAP/FSP suggests that:

- Slightly less than one-third of the households are eligible for at least one of the programs.
- Almost all units simulated as eligible for SNAP/FSP are also eligible for FDPIR.
- Households simulated as eligible for FDPIR, but not for SNAP/FSP, are more common.
- Overall, 85 percent of the units that are eligible for either program are eligible for both.

Participation

What determines the choice between programs, among people who have a choice? The size of the benefit for which the household would qualify is certainly a factor, but administrators and participants suggest that the ease of enrollment, cultural compatibility, choice in food selection, and access to grocery stores also appear to affect participation decisions. Some households switch back and forth between the programs in the course of a year. While it is difficult for an eligible person to take all these factors into account in deciding which program to use, focus groups suggested that an informal communication system communicates (correctly or not) the relative benefits of FDPIR and SNAP/FSP.

Our TRIM3 estimates suggest that a majority of households eligible for both programs would receive larger benefits from SNAP/FSP than from FDPIR. Households with aged or disabled members tend to do better with FDPIR because fixed income from Social Security or SSI may leave them eligible for only a small SNAP/FSP benefit. Households without aged or disabled members tend to do better with SNAP/FSP, whether they have children or not.

Program administrators and participants also identified other factors influencing participation decisions:

- **Ease in enrollment and continued participation**. Both administrators and participants stressed that it is easier to enroll in FDPIR than in SNAP/FSP, which requires more documentation. SNAP/FSP enrollment usually requires a visit to the county assistance office.

- **Milieu/cultural compatibility**. Some FDPIR staff and participants said that they do not feel welcome or comfortable in county offices. This sense seems to have roots in a long history of conflict with and discrimination against American Indians/Alaska natives by non-native individuals, political entities (states, counties, and municipalities), and other organizations. In contrast, the FDPIR offices are located on the reservation, are staffed by tribal members, members of other tribes, and non-native people. Most of the offices have culturally-

compatible decorations, educational materials, etc., that make FDPIR participants feel welcome and at home.

- **Choice in food selection and access to stores with competitive pricing and wide selection.** Improved economic conditions on some reservations and the expansion of Wal-Mart and other retail chains have increased access to supermarkets and grocery stores that offer far better prices and wider selection (coupled with the greater choice inherent in SNAP/FSP) than the on-reservation convenience stores with which they compete. This increases the value of SNAP/FSP benefits and thus the likelihood that eligible households will choose to enroll in that program rather than FDPIR.

- **Home delivery**. At several of the sites we visited, either FDPIR staff or tribal Community Health Representatives (CHRs) provide home delivery to aged and disabled participants; supermarkets may not provide home delivery, or may deliver only with additional fees. Some of the elderly enjoy the visits of the FDPIR staff or CHRs that deliver the food, and in some cases these individuals will help by putting the food away in participants' cabinets.

- **Stigma.** Respondents' comments about the role of stigma in participation decisions differed. Some potential participants see SNAP/FSP as undesirable "welfare," but do not view FDPIR the same way. In fact, a few FDPIR staff members and participants said that the "commodities programs" are not welfare programs, but treaty obligations, accepted by the tribes in exchange for the cessation of hostilities and the ceding of tribal lands to the United States. Staff at one program, however, said that some people prefer SNAP/FSP because it offers greater privacy: use of the EBT card is more private than picking up commodities from program distribution sites.

- **Other advantages for the elderly.** Home delivery is only one of the factors contributing to a preference for FDPIR over SNAP/FSP among the elderly. SNAP/FSP benefits are provided through EBT, and some people age 60 and over may be less comfortable using the cards than their younger counterparts. Tribal FDPIR offices are more likely to have staff fluent in native languages than county SNAP/FSP offices, and elderly American Indians are more likely to need this help. Most FDPIR foods require some kind of cooking, and seniors are more likely to know how to cook.

Program administrators gave us estimates of the proportion of FDPIR recipients who moved back and forth between that program and SNAP/FSP that ranged from "not too many" to 10 or 20 percent. The comments of focus group participants were consistent with this range. Some participants are better off with different programs in different months because of volatility in employment that produces fluctuations in monthly income. Others are ineligible for SNAP/FSP in some months due to the ABAWD rules. Volatility in eligibility and benefits, therefore, would lead us to expect a significant proportion of participating households to switch programs once or more during the year.

Some of the participants who switch between the two programs use SNAP/FSP to periodically load up on staples such as coffee or sugar that are not included in the food distribution package. Others use FDPIR when extreme weather conditions reduce access to supermarkets. Both FDPIR staff and participants said that during summer and other periods

when school is not in session, parents switch from SNAP/FSP to FDPIR because a greater quantity of food is available and because the children cannot participate in school nutrition programs. Conversely, but less often, some of the respondents in our focus groups reported switching to SNAP/FSP at holiday breaks and during the summer in order to purchase convenience foods for their school-age children.

Program Administration

Variation among FDPIR programs in the number of participants and the extent of their service areas contributes to differences in program administration, including program structure and service area, inventory and delivery modes, nutrition education, and partnerships.

Program Structure

Study sites demonstrate a range of program structures. Sherwood Valley Pomo FDPIR is located in one rancheria but also serves 19 others over a large area of California. In contrast, the programs in the South Dakota study sites each were run at the local level for benefit of the local tribe. Both the California and South Dakota sites, however, were similar in that the programs stand alone organizationally; they are not part of a larger tribal or regional human services administrative unit.

FDPIR programs we visited in Minnesota and Oklahoma coordinate with the tribes' human or social services departments as one of a number of social service programs offered. These FDPIR programs are similar to those in South Dakota in that they serve their tribal members and other qualified clients rather than serving a number of tribes like the California program does. Each of the two Oklahoma programs we visited serves a rural and dispersed client base within its tribal jurisdiction.

Like FDPIR, SNAP/FSP is a federal program. States vary in the extent to which administrative responsibility resides at the state level or is devolved to the counties. In California and Minnesota, SNAP/FSP is administered at the county level following state regulations. SNAP/FSP is state administered in Oklahoma and South Dakota. All county SNAP/FSP offices visited were part of human services offices that also provided eligibility services and administration for Temporary Assistance for Needy Families (TANF), emergency services, Medicaid, and other federal and state assistance programs.

Relationships between FDPIR and SNAP/FSP are quite limited. Each of our study sites indicated that the monthly contacts to ensure clients are not enrolled in both programs were the extent of their partnership. SNAP-Ed/FSNE grants provide some of the funding for the nutrition efforts of the Fond du Lac and Chickasaw Nation programs, in which clients of both programs can participate.

Commodity Distribution

Program and service-area size affects the modes of commodity delivery. The larger the area and the client base, the more options a program offers. Most programs also offer home

delivery to elderly clients and those who are disabled, and in one site, to anyone whose vehicle will not start during the winter.

The main FDPIR delivery modes are:

- **Warehouse Pickup.** This is the most widely used method of delivery. FDPIR participants (or their designees) get their packages at the main warehouse. Participants in programs with more than one warehouse, including the two Oklahoma programs we visited, can also pick up at a satellite warehouse in another location that may be more convenient.

- **Tailgate Pickup.** With tailgate pickup, participants get their commodities from a truck that parks at a specific location, generally once a month. Tribal clinics and community centers such as the Navajo Nation's chapter houses, which provide multiple services, are common tailgate sites.

- **Store Pickup.** Some food distribution programs in Oklahoma and New Mexico use the store model of distribution. Available foods are arranged in open shelves and participants can inspect and compare different items before making their choices. The stores are designed to be attractive and similar to a commercial supermarket experience. The amount that the shopping participant can select within each category of FDPIR foods is determined by the same monthly distribution guide rates that govern the other distribution modes.

Stores are the primary distribution mode for the Chickasaw Nation and Choctaw Nation programs. Chickasaw staff said that most clients come to the store themselves or have someone bring them even though the area served is large. The stores are very popular with both staff and customers.

Nutrition and Health

Obesity, diabetes, heart disease, and other diet-related health conditions, increasingly prevalent among the general population, are particularly widespread among American Indians and Alaska Natives. Some tribes have responded by developing innovative diet and exercise programs, often drawing on tribally specific traditions and cultural values. It is also important to consider whether FDPIR and SNAP/FSP are helping tribes address these critical health conditions in Indian Country or making them worse.

FDPIR staff and participants told us that their program had better effects on health and nutrition than SNAP/FSP. In particular, there was concern about the availability of processed and "junk" foods through SNAP/FSP. Although our research methods cannot determine the accuracy of this view, we can identify three aspects of the programs that may affect nutrition: food choices, nutrition, and referrals and partnerships with other programs.

Food Choices

One difference between the FDPIR and SNAP/FSP programs is in the nutritional quality of the individual foods they make available. SNAP/FSP can be used for any food to be consumed at home, including those FNS classifies as "foods of minimal nutritional value" in the context of

the National School Lunch Program (soda, water ices, chewing gum, and candy) and others, such as potato chips and cookies, that are only slightly better nutritionally. Foods that meet nutritional needs may also be high in sodium, fat, or added sugar.

All of the foods in the FDPIR package, in contrast, address some nutritional need, and FNS has been working to find versions of these foods that are lower in salt, fat, and sugar, yet tasty enough that participants will select and consume them. Some foods have been dropped from the package altogether, in favor of healthier substitutes. For example, butter, shortening, and luncheon meats have been dropped, but vegetable oil and turkey ham are included.

The quality of FDPIR food has been improved by the Fresh Fruits and Vegetables Program, in which most programs, including six of the seven that we visited, now participate. In some years (most recently, FY 2006), Congress has directed that a portion of FDPIR funding be used to purchase bison meat. Bison's low fat content, compared with beef, has made it popular even in places such as Oklahoma and California where it is not a traditional food.

Since FDPIR participants have less freedom to choose among foods than their SNAP/FSP counterparts, it is theoretically possible, to come closer to recommended nutrient levels with SNAP/FSP, by following the Thrifty Food Plan, than by eating only FDPIR foods. But, because SNAP/FSP participants have more freedom to make unhealthy choices than participants in FDPIR, the FDPIR participants may actually be eating better. Data on food intake or purchases for FDPIR participants and a comparison group of SNAP/FSP participants from the same reservations would be needed to know for sure.

Nutrition Education

Both FDPIR and SNAP/FSP seek to influence participants' food choices by providing nutrition education along with their food or electronic benefits. Initiatives supported by SNAP-Ed/FSNE funds do not necessarily include an active role for the local SNAP/FSP office; cooperative extension may be more directly involved. FDPIR administrators generally described the funding for nutrition education prior to FY 2008 as inadequate. FDPIR agencies can compete for SNAP-Ed/FSNE funds from their state SNAP/FSP agency. Two of the programs we visited had these funds: the Fond du Lac reservation, which used the money to fund a Nutrition Education Assistant at the tribal health clinic, and the Chickasaw Nation, which used the money primarily to fund cooking demonstrations. Some of the FDPIR programs rely on partnerships with other agencies, which are better funded, to supplement the resources they have for nutrition education services. Entities mentioned include Head Start, WIC, SNAP/FSP, IHS, and county extension services.

FNS has recently established a new program of competitively awarded grants specifically for FDPIR Nutrition Education. Two of the programs we visited received awards in the first year (2008). The Crow Creek Sioux received a grant for efforts to encourage gardening, particularly with traditional foods. The Sherwood Valley Pomo program received a grant for initiatives to change behavior related to diet and physical (in)activity. FDPIR agencies in the Mountain Plains Region, including the South Dakota programs we visited, pool their nutrition education funds to support the Mountain Plains Nutrition Advisory Committee, which received an FDPIR Nutrition Education grant to develop materials that will be used by all the programs in the region.

Active nutrition education efforts pursued by the FDPIR programs in this study include cooking demonstrations, taste tests, cooking competitions among clients ("cook offs"), activity and wellness programs for children and adults, and special events, such as health fairs and the Cahto Coast Walk (California). Passive activities include displaying nutrition-related posters in offices, warehouses, tailgate sites, and stores. Programs also offer clients print materials such as recipe cards, cookbooks, calendars, newsletters that contain nutrition information, nutrition handouts, and handouts or pamphlets on specific diet-related health conditions such as obesity, diabetes, and heart disease.

Coordination with Other Health and Nutrition Services

FDPIR and SNAP/FSP can also affect health and nutrition by connecting their clients with other services. FDPIR agencies appear to do so more often than SNAP/FSP offices, particularly when the FDPIR enrollment or distribution site is located near tribal WIC programs and IHS or tribal clinics. The Chickasaw Nation Food Distribution Program is governed as part of the tribal health system, and one of the Sherwood Valley Pomo program's tailgate sites is Northern Valley Indian Health, Inc., which operates as a "one-stop service [center] for health care, food security, and housing assistance." At another program, an IHS nurse comes to the FDPIR office (where enrollment occurs) twice a month to check blood pressures and blood sugars. The nurse frequently makes referrals for patients at risk for diabetes.

Conclusions and Policy Implications

The central question for food assistance on and near reservations, now as in 1977, is whether a policy that offers a choice between SNAP/FSP and FDPIR, at both the tribal and household levels, is preferable to a policy based on SNAP/FSP alone.

FDPIR benefits some American Indian and Alaska Native households that are not eligible for SNAP/FSP. The TRIM3 simulation estimates suggest that in an average month, 13 percent of households eligible for FDPIR would not be eligible for SNAP/FSP. In most cases, this is due to the SNAP/FSP ABAWD rules or gross income limit, which do not apply to FDPIR. Another 41 percent of the households eligible for FDPIR are eligible for SNAP/FSP but would receive FDPIR commodities with retail value above the SNAP/FSP benefit. The remaining 46 percent of households eligible for FDPIR are eligible for SNAP/FSP and would receive more benefits from that program than from FDPIR.

The main argument for continuing commodity assistance in 1977 was that the residents of some reservations would have to travel great distances to county offices and grocery stores to obtain and use food stamps. While this argument is somewhat weaker today, it continues to be valid, and seems likely to be valid until reliable and economical transportation comes to Indian country. Participation in SNAP/FSP remains more difficult on reservations than in metropolitan areas: eligible persons often lack reliable transportation, public transportation is often nonexistent, and roads on many reservations are hazardous or impassable in winter.

On some reservations, access to grocery stores is better than it was 30 years ago. Economic conditions on many reservations have improved, making them more attractive markets for outside companies. Some tribes have built and operated their own supermarkets as part of

their economic development programs. Physical access to county SNAP/FSP offices, meanwhile, has become less important as longer certification periods, wider availability of application forms, electronic benefits, and other changes in SNAP/FSP have reduced the need to make these trips. Despite these positive changes, the site visits indicated that, were FDPIR to be eliminated today, barriers to accessing food would threaten the food security of large numbers of eligible families residing on Indian reservations.

Although the access argument for continued commodity distribution on reservations has become a bit weaker, other arguments can be made that would not have been valid, or would have had less force, in 1977:

- Increased obesity and diabetes among American Indians has increased tribal interest in health and nutrition, and FDPIR has become a healthier, more nutritious program.

- FDPIR also addresses the health needs of American Indians and Alaska Natives through its nutrition education efforts, funded by FDPIR as well as through SNAP-Ed/FSNE grants to tribes. State and county offices also provide SNAP-Ed/FSNE but those efforts, designed for the broader low-income population, appear to draw less on traditional foods and other aspects of tribal culture.

- FDPIR sees participants monthly, when they pick up their packages. These monthly visits provide regular opportunities for staff to demonstrate healthy food preparation, recruit for other nutrition education activities, and reinforce nutrition messages with posters, handouts, cookbooks, and DVDs. All this is done in culturally compatible and appropriate ways. Direct contact between SNAP/FSP staff and their clients is less frequent than with FDPIR due to a longer certification periods, reduced reporting requirements, and other changes that have reduced the number of times each year that a participant must visit the county program office.

- FDPIR offers several food delivery options, including warehouse pick-up, grocery store style facilities, tailgates, and home delivery, depending upon the tribe. This allows tribes to accommodate those in remote areas as well as elders and those with disabilities. SNAP/FSP participants must make their own arrangements for purchasing and transporting food.

- FDPIR also contributes to Indian health through its connections to tribal health programs or IHS. FDPIR offices and warehouses are often located near IHS or tribal clinics, and some programs use the clinics as tailgate sites. This proximity means that FDPIR participants can combine food pickup with clinic appointments, reducing the number of trips, and makes it easier for FDPIR to draw on health staff to consult on nutritional questions.

- Most FDPIR agencies are administered by tribes or intertribal organizations. The conditions for tribal administration of SNAP/FSP are more stringent, and in fact have never been met. The operation of programs by the tribes is consistent with Indian self-determination and self-governance, a cornerstone of federal-tribal relations. Tribal administration is also more likely to be culturally appropriate than state or county administration. Where tribes administer related programs, tribal administration of FDPIR may contribute to policy coordination in accordance with the tribe's strategic plan.

The study identifies two areas for improvement in FDPIR:

- While the FDPIR agencies are taking advantage of nutrition education funding opportunities, there is a need for more innovative initiatives to improve nutrition education and for actual changes in food preparation and consumption of healthy foods by participants.

- Some tribes have been able to improve facilities and service delivery options for FDPIR participants, but some FDPIR programs indicate that they have limited equipment to handle fresh produce or frozen meats and cannot renovate facilities due to a lack sufficient infrastructure funding. Our interviews with program officials were conducted prior to the American Recovery and Reinvestment Act of 2009 (ARRA), which provides $5 million for FDPIR equipment purchases and facility improvements in FY 2009 and 2010.

FDPIR and its management on reservations are far different than in 1977. Improvements in the products provided, tribes' increased awareness about health and nutrition, and the principles of tribal self-determination and self-governance all suggest that FDPIR continues to be a desirable alternative to SNAP/FSP for those living on or near reservations.

Figure ES-1. FDPIR and Indian Reservations, by State, FY 2009

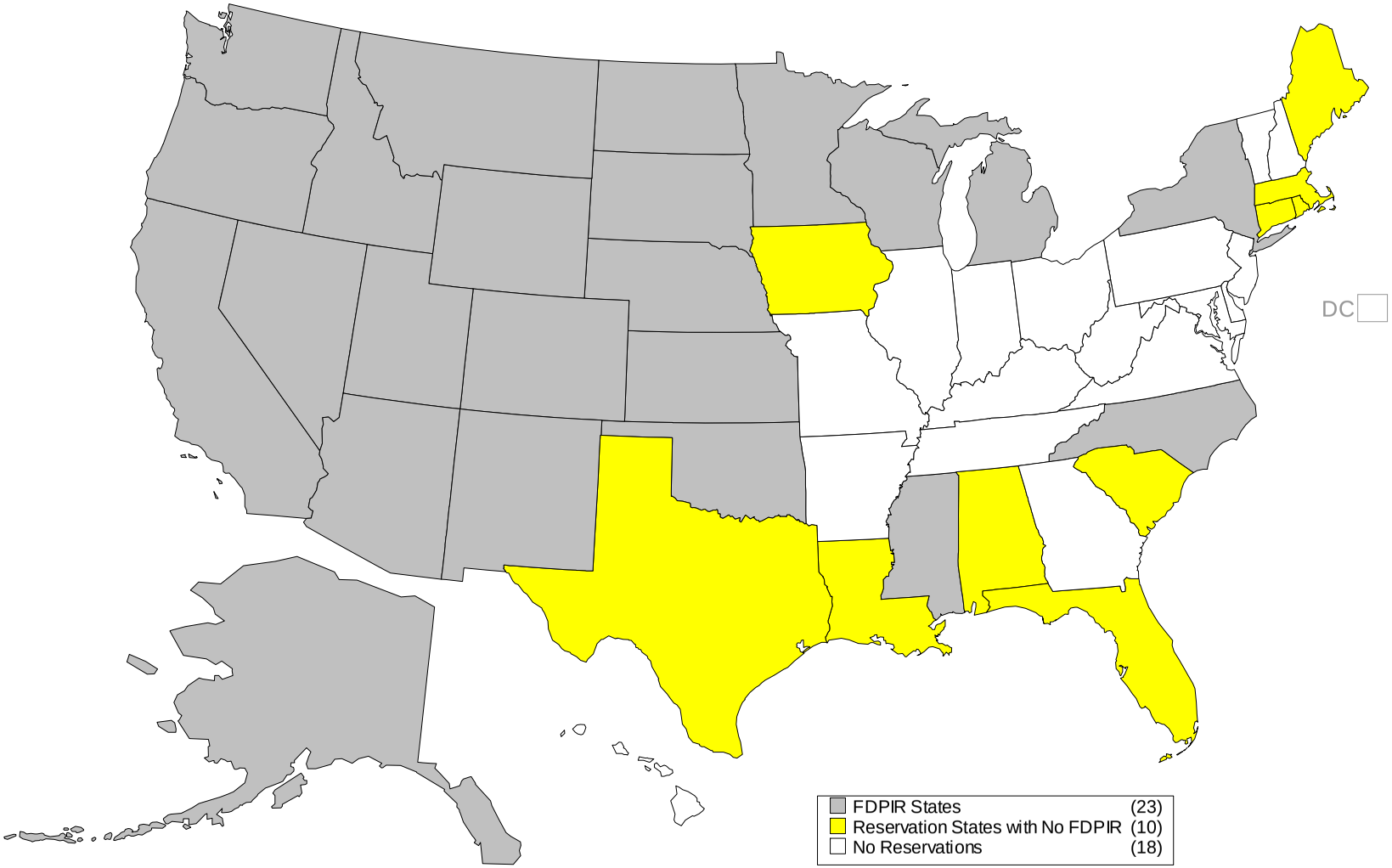
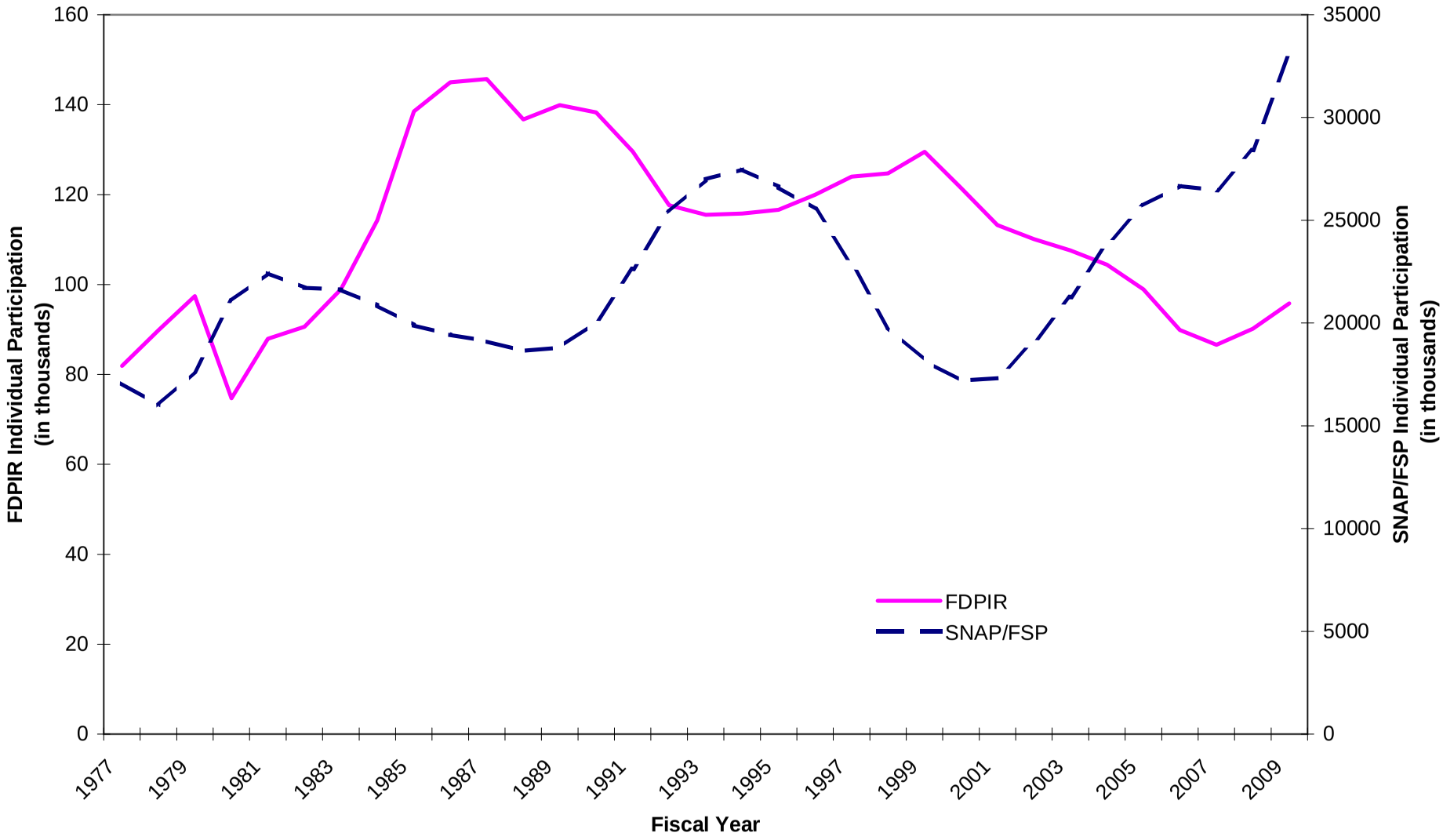


Figure ES-2. FDPIR and SNAP/FSP Enrollment, FY 1977-2009



Source: Food and Nutrition Service.

Note: FY 2009 data for October 2008 through July 2009 only.

Table ES-1. Program Comparison

Category	Supplemental Nutrition Assistance Program (SNAP)	Food Distribution Program on Indian Reservations (FDPIR)
Geographic Coverage	Available throughout U.S. and in Guam and the Virgin Islands	Available on or near reservations and in Oklahoma Tribal Jurisdictions (23 states) Not available in places with populations of 10,000 or more unless located on reservation or covered by an FNS waiver
Tribal Administration	No tribally administered programs Some tribes involved in local administration*	Most programs*
Benefits	Electronic, dollar-denominated benefits Cannot be used to buy alcoholic beverages, tobacco products, pet food, or hot food for immediate consumption Varies by household size and net income	Commodity package Varies by household size only

* Policies with significant state or tribal variation.

I. INTRODUCTION

The Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program (FSP), provides low-income households with electronic benefits that can be used to purchase food in grocery stores and supermarkets.[1] None of the program's many eligibility requirements are based on race or ethnicity.

People of any race residing on Indian reservations, and households with American Indians and Alaska Natives residing off but near reservations, or in certain areas of Oklahoma, may have a food assistance option besides SNAP/FSP.[2] They may be able to participate in the Food Distribution Program on Indian Reservations (FDPIR), which provides a monthly package of commodities. Eligibility requirements for FDPIR are similar, but not identical, to those for SNAP/FSP. Households cannot participate in both FDPIR and SNAP/FSP in the same month, so those who are eligible for both programs must choose between them.

This report combines findings from site visits to seven reservations that participate in FDPIR with analysis of administrative and survey data to compare the two programs with regard to eligibility, participation, administration, and possible effects on health and nutrition. The information and analysis in the report are meant to help the USDA, Congress, and tribal governments understand the contributions and limitations of each program, and how they do or do not work together and with other programs on the reservations.

The subsections immediately below provide background on the origins of FDPIR, its current operations, and recent trends. We then trace the broad outlines of the comparison between FDPIR and SNAP/FSP, review earlier studies, and lay out our detailed goals and objectives. Subsequent sections cover research methods, eligibility, participation, program administration, and health and nutrition. The last section of the main text discusses our conclusions and their policy implications. The seven analytical site summaries, with illustrative photos, are attached as an appendix.

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[1] The 2008 Farm Bill renamed the program, effective October 2008. Most of our data was collected before the name change. We refer to the program as "SNAP/FSP" throughout the report. Food Stamp Nutrition Education (FSNE) was renamed SNAP-Ed; we refer to this program as "SNAP-Ed/FSNE."

[2] "American Indians and Alaska Natives" are one of the five racial categories under the racial and ethnic classification standards issued by the Office of Management and Budget (OMB) in 1997 (OMB 1997). In Oklahoma, American Indians and Alaska Natives (AI/ANs) residing within the non-reservation Tribal Jurisdictions can participate in the program along with AI/ANs residing on or near the state's one reservation. Unless otherwise noted, we use "American Indian" for both American Indians and Alaska Natives, and "Indian reservation" for both reservations and Oklahoma Tribal Jurisdictions.

Program Background

Between 1778 to 1871, the United States negotiated hundreds of treaties with American Indian tribes (Prucha 1994).[3] Typically, the tribe agreed to cede land and cease hostilities. In exchange, the United States often promised to protect a reservation from further incursions by non-Indians. The U.S. also promised to provide education (teachers and schools), health care (doctors and nurses), and food "rations" to make up for the loss of hunting, fishing, and agricultural areas. Not all tribes were parties to such treaties; no treaties were ratified with any of the California tribes, for example. But some members of the "treaty tribes" view FDPIR as the continuation of the treaty-based rations.

Beginning in 1936, surplus commodities were extended to other Americans under the Needy Family Program. During the 1960s and 1970s, however, the Needy Family Program was gradually replaced by the expanding Food Stamp Program. The Food Stamp Act of 1977, which gave SNAP/FSP its current form, established FDPIR as an explicit exception to the general policy of providing food assistance through vouchers rather than commodity distribution. The legislative history suggests members of Congress were particularly concerned about the distances some reservation residents would have to travel to SNAP/FSP offices and grocery stores in order to obtain and use food stamps (Usher et al. 1990). The statutory language indicated that the program was intended to give American Indians and Alaska Natives "an opportunity to obtain a more nutritious diet," but according to the conference committee report, this did not mean that the FDPIR package by itself would necessarily be nutritionally adequate (FNS 1978).

Under the Food Stamp Act and its successor, the Food and Nutrition Act of 2008, an Indian Tribal Organization (ITO), which can be the governing body of a single tribe or an intertribal organization, decides whether to participate in FDPIR. Either the ITO or the state can administer the program. FDPIR, like SNAP/FSP, is administered at the national level by the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS). Tribal administration of FDPIR requires an FNS determination that the ITO is capable of administering the program and a written agreement between FNS and the ITO.

FDPIR offers a wide variety of nutritious foods from which program participants may select, including vegetables, fruits, juices, cereals, grains (including whole grain products), pasta, vegetable oil, meats, poultry, fish, and other proteins such as canned and dry beans, peanut

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[3] The American Indian entities recognized by the federal government call themselves tribes, bands (subunits of tribes), nations, colonies, rancherias (California), pueblos (New Mexico and Texas), and native villages (Alaska). Similarly, they may call their land a reservation, nation, colony, rancheria, pueblo, or native village. These different terms reflect historical patterns of settlement and organization. FDPIR regulations make it clear that the terms are legally equivalent in the context of program administration. See CFR 253.2(d) and (g). Following FNS practice, we use "tribe" and "reservation" when discussing programs in general. In discussions of specific tribes or programs, we adopt the terms that they prefer.

butter, and egg mix. Table 1 shows the foods available from FNS. Tribal or state program staff decide what to order, so some of the foods listed may not be available on a particular reservation.

FDPIR provides a selection of canned fruits and vegetables, but also offers ITOs and State agencies the option of providing fresh fruits and vegetables to program participants. The fresh produce is purchased and delivered under an agreement with the Department of Defense, Defense Supply Center Philadelphia. The collaborative effort between DoD and USDA takes advantage of the national food distribution infrastructure developed to meet military food needs to supply food to schools (the original recipients) and reservations. As of May 2009, 101 out of 111 FDPIR programs were approved to participate in the Fresh Produce Program. An additional program was expected to begin offering fresh produce in June 2009.

Like the Commodity Supplemental Food Program (Finegold et al. 2008) and other commodity distribution programs, FDPIR has become more health-conscious and more consumer-friendly (Cook 2004; Finegold et al. 2005). Packaging and labeling for many products more closely resembles commercial products, and provides more nutrition information. FNS has reduced the fat, sugar and sodium levels in many of the products offered, and is offering more frozen meats in lieu of canned meats. Some programs, such as those of the Chickasaw and Choctaw Nations in Oklahoma, now provide foods in a store-like setting that allows participants to choose among the available foods on the shelves.

FDPIR also promotes healthy eating through nutrition education activities such as cooking demonstrations and recipes for preparation of FDPIR foods. FNS sets aside $250,000 from the annual appropriation for FDPIR administrative funding to be allocated to the ITOs and State agencies and used specifically for Nutrition Education. The ITOs and State agencies may supplement the funding used for nutrition education with the federal FDPIR funding they receive for general administrative purposes and matching funds they provide (generally 25 percent of their total budget, but reduced or waived entirely for some tribes, as warranted). Tribes can also apply to their SNAP/FSP state agency for SNAP-Ed/FSNE funds.

In FY 2008 and FY 2009 FNS received $1 million in funding to be allocated to the ITOs and State agencies to enhance the nutritional knowledge of FDPIR participants, and foster positive lifestyle changes for eligible household members through intensive integrated nutrition education interventions. In FY 2008, funding was awarded to 21 ITOs on a competitive basis. In FY 2009, 14 ITOs and the state-run program in Nevada received funding. Table 2 shows the recipients of the funding. The funded projects included nutrition classes, cooking demonstrations, and development of nutrition education materials. Several of the projects emphasized the promotion of traditional tribal foods.

Comparing FDPIR and SNAP/FSP

FDPIR and SNAP/FSP are both widely used in reservation areas. The proposed rules for FDPIR, issued in December 1978, said that the USDA would "offer a variety and quantity of commodities for Indian households such that the commodity package represents an acceptable alternative to Food Stamp Program benefits." This language, taken directly from the presentation of the proposed rules in the Federal Register (FNS 1978), is worth parsing. The phrase,

"acceptable alternative" captures a particular assessment of the role of FDPIR in food assistance. "Acceptable" is certainly better than "unacceptable," but it is not as good as "preferred," or even "equally desirable." And "alternative" suggests that the larger program should be viewed as the norm.

Thirty years later, the two programs are still closely linked. FDPIR and SNAP/FSP were reauthorized together in 2002 and again in 2008. Key FDPIR concepts, such as the definition of a household, have been borrowed from SNAP/FSP. Overall, the eligibility requirements of the two programs are similar but not identical.

Table 3 compares geographic coverage, benefits, and tribal administration in the two programs. SNAP/FSP is offered in all 50 states, the District of Columbia, Guam, and the Virgin Islands. FDPIR currently operates in 23 states, mostly in the West (Figure 1). Forty-three percent of the U.S. general population, including 69 percent of people who identify themselves as American Indian or Alaska Native, live in these 23 states.[4]

As indicated in Table 3, tribal administration is the norm for FDPIR and nonexistent for SNAP/FSP. Most FDPIR programs are run by ITOs, which may be tribal governments or intertribal consortia. State agencies in Montana, Nevada, North Carolina, North Dakota, and Oregon administer FDPIR for some or all of the tribes in these five states. Four of the five state-administered programs, however, delegate eligibility determination and benefit distribution to tribal governments (Usher et al. 1990).

The Food and Nutrition Act permits tribal administration of SNAP/FSP, but under conditions that are much more restrictive than those applied to FDPIR, WIC, or the Commodity Supplemental Food Program (CSFP). For an ITO to assume responsibility for SNAP/FSP, the Secretary of Agriculture must issue findings that the state is failing to properly administer a program, and that the ITO is capable of doing so. Neither finding has ever been issued (Finegold et al. 2005).

FDPIR provides benefits in kind, while SNAP/FSP provides electronic benefits that are almost like cash, but can only be used for food. The benefit formulas for both programs take household size into account, but the SNAP/FSP formula is also based on net income.

From FY 1996 to FY 1999, FDPIR enrollment grew and overall SNAP/FSP enrollment fell (Figure 2). FDPIR enrollment then dropped 33 percent between FY 1999 and FY 2007; enrollment in SNAP/FSP, meanwhile, has grown more than 80 percent since it bottomed out in FY 2000. The two programs have grown together in the current recession. FDPIR enrollment rebounded with a 4 percent increase in FY 2008, and increased further in FY 2009.[5] SNAP/FSP

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[4] Urban Institute analysis of 2007 data from the American Community Survey (ACS).

[5] FY 2009 data is for October-July only.

enrollment during the same period has reached an all-time high of more than 31 million participants.

Previous Research

FDPIR targets a population that is particularly likely to experience economic hardship, and with it food insecurity. Compared with other groups, American Indians have low incomes, high poverty, and high unemployment (Bishaw and Semega 2008; U.S. Census Bureau 2003). Rates of food insecurity, among families with or without children, and food insecurity with hunger, among families without children, are higher for American Indians than for the general population (Gundersen 2005).

Food security on and near reservations depends heavily on FDPIR, SNAP/FSP, and other food assistance programs. Miller (1994), for example, reported that in Montana, FDPIR was the main source of food for 51.5 percent of participating households, and the only source of food for 7.4 percent. A United States Government Accountability Office (hereafter GAO) study (GAO 1990) reached similar conclusions. Hiwalker et al. (2002) found that the major sources of food on the Northern Cheyenne reservation were wages (64 percent of respondents), FDPIR commodities (33 percent), SNAP/FSP (31 percent), and WIC (26 percent). Virtually all those interviewed for the Northern Cheyenne study said that when they could, they shared with neighbors, family, and friends in need of food. Reservation food assistance programs, therefore, affect the food security of even more people than participation numbers might suggest.

American Indians are also particularly likely to experience health problems related to food and nutrition, including diabetes (Acton et al. 2003; Knowler et al. 1983; Neel 1999), obesity (Liao et al. 2003), and tooth decay (Grim et al. 1994; Niendorff and Jones 2000). Breastfeeding, with its many health and economic benefits, is less common among American Indian mothers than among women from other groups (Long et al. 1995; Wright et al. 1997).

Low income makes many American Indians and Alaska Natives eligible for FDPIR, SNAP/FSP, or both. Particularly high rates of obesity and diabetes, combined with the general association between poverty and poor health, make it crucial to understand whether the two programs meet the food assistance needs of Indian reservations or—as earlier critics (for example, Dillinger et al. 1999) charged—make things worse.

The only major study of FDPIR is the program evaluation completed by Usher, Shanklin, and Wildfire for FNS in 1990 (Usher et al. 1990).[6] The extensive research for their report included 21 site visits, surveys of FDPIR participants and American Indian SNAP/FSP participants, and five focus groups. Their findings included:

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[6] A related article by the same authors (Shanklin, Usher, and Wildfire 1992) included additional discussion of FDPIR nutrition education.

- An estimated 13 percent of FDPIR households were not eligible for SNAP/FSP.
- FDPIR households were more likely than SNAP/FSP households to have elderly members.
- FSP households were more likely than FDPIR households to be receiving benefits from Aid to Families with Dependent Children (AFDC), the predecessor to today's TANF program.
- Switching between FDPIR and SNAP/FSP was common. Many survey respondents and focus group participants who were in one program at the time they were interviewed had previously been in the other.
- Although many participants had serious transportation problems, distance to either the SNAP/FSP office or grocery stores where food stamps could be used was only a minor factor in the choice between the two programs because distances to FDPIR distribution sites were almost as large.
- Nutrition education consisted largely of distributing recipes and cookbooks. Few programs had trained nutritionists on staff, but some programs worked with local WIC, Indian Health Service (IHS), or Agricultural Extension Service nutritionists to obtain or develop printed materials.

Usher et al. found that SNAP/FSP was more flexible and more convenient for AFDC recipients than FDPIR, but that FDPIR was easier to enroll in and less stigmatized than SNAP/FSP. They concluded that, "together FDPIR and the Food Stamp Program are probably more effective in meeting the food assistance needs of American Indians than either program would be individually" (Usher et al. 1990). While the current study supports the conclusion of the 1990 report that the programs together are probably more effective than either alone, the earlier finding that differences between the programs in the travel needed to enroll and participate were not large enough to have much influence on participation decisions was disconfirmed. FDPIR recipients in several of our sites said that FDPIR was more convenient than SNAP/FSP and that this did influence participation decisions for those eligible for both programs.

About the same time as the FNS evaluation, the GAO issued two studies of reservation food programs at congressional request (GAO 1989, 1990). In field research on four reservations, GAO staff found evidence of continued hunger, and SNAP/FSP participants whose benefits for the month had run out were among the hungry. SNAP/FSP requirements, the reports suggested, discouraged some eligible households from participating and caused some participating households to drop off the rolls. The GAO reports placed more emphasis on transportation problems as a factor in participation decisions than Usher et al. (1990). GAO also raised questions about the nutritional quality of FDPIR foods, which were high in salt and fat, and found nutrition education to be inadequate in both programs.

Finegold et al. (2005) provide a guide to more recent information on food assistance to American Indians living on or near reservations. The authors reviewed existing data sources (including administrative data and 26 national, state, and tribal surveys) and prior quantitative and qualitative research on FDPIR, SNAP/FSP, WIC, CSFP, the National School Lunch Program, and the School Breakfast Program as sources of food assistance. They conducted telephone interviews with tribal representatives, program administrators, and other experts to identify what they saw as the most important current issues in these programs. The following topics emerged from the interviews as topics of continuing research importance: 1) the impacts

of reservation food assistance on health, nutrition, and traditional foods; 2) the characteristics that make nutrition education effective on reservations; 3) the dynamics of program participation; and 4) the contribution of tribal administration to program coordination.

Much of the research on reservation food programs since 1998 has been conducted with support from the partnership of the USDA Economic Research Service's Research Innovation and Development Grants in Economics (RIDGE) Program with the University of Arizona American Indian Studies Program and the University's Native Peoples Technical Assistance Office (White et al. 2005).[7] Several of these studies included small-scale surveys (see Appendix B in Finegold et al. 2005). Most of the studies have focused on particular reservations or tribes, but their findings may apply more broadly.

Among the RIDGE reports that are most relevant to this project, Davis et al. (2000) found that welfare reform produced a shift from SNAP/FSP to FDPIR among the Northern Cheyenne. Lopez and Reader (2003) argued that commodity foods helped to displace the healthier traditional foods of the Tohono O'odham food system and proposed changes in FDPIR to bring them back, such as allowing programs to purchase locally traditional foods up to 10 percent of their food packages. Zastrow (2000) criticized FDPIR and SNAP/FSP nutrition education, suggesting that the lack of staff (and therefore participant) knowledge about nutrition and inadequate funding for fresh fruits and vegetables contributed to obesity and increased risk of diabetes among the Winnebago. A survey of Gros Ventre and Assiniboine elders on the Fort Belknap Reservation found that many were ineligible for any of the federal food programs because their incomes or assets exceeded program limits, and that they remembered commodity assistance as a more important food source in their childhoods than it was for them now (Grant et al. 2000).[8]

A series of implementation studies examined tribal administration of programs that do not provide food, but do serve populations similar to those receiving FDPIR and SNAP/FSP. The tribal component of the National Welfare to Work Evaluation (Hillabrant et al. 2001) involved work with a panel of tribal leaders and representatives of national Native American organizations, and telephone and on-site interviews with tribal program administrators and tribal elected officials. A study of tribal TANF operations (Hillabrant, Rhodes, and Pindus 2003) described the experiences of 10 tribes in planning, implementing and operating TANF programs, highlighting their accomplishments and pride in administering their own programs as well as the challenges in moving tribal members to work due to economic as well as personal barriers. And, a study of economic development (Hillabrant et al. 2004) found that the combination of tribal self-governance and self-determination with federal programs that promote tribal enterprise,

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[7] The RIDGE program was formerly known as the Small Grants Program.

[8] These papers and others from the program are available on the Native Peoples Technical Assistance Office website at http://www.nptao.arizona.edu/usda.cfm.

provide funding, and improve access to capital had produced a shift in favor of tribal business and economic development.

Goals and Objectives

Both FDPIR and SNAP/FSP have undergone important changes since publication of the FNS evaluation and the GAO reports in 1990. For this report, the first major study of FDPIR since then, we combined qualitative and quantitative approaches to address four objectives, all comparative:

1) **Compare eligibility in FDPIR and SNAP/FSP**. How important are the differences in eligibility requirements for the two programs? How much do the eligible populations for the two programs overlap? Who, on or near the reservations, is eligible for FDPIR but not SNAP/FSP, and who is eligible for SNAP/FSP but not FDPIR? To what extent has the decline in FDPIR enrollment—or the more recent uptick—resulted from changes in the number of people who are eligible to receive commodities?

2) **Compare participation in FDPIR and SNAP/FSP**. How do people who are eligible for both programs make the choice? Are the elderly more likely to be in FDPIR than other American Indians (Usher et al. 1990; White et al. 1997; Benally 2004), and if so why? Do calculations of expected benefits dominate decisionmaking? How common is it for participants to switch back and forth between FDPIR and SNAP/FSP, in response to their circumstances that month (Usher et al. 1990)? To what extent have recent enrollment trends resulted from changes in participation among people eligible for both programs?

3) **Compare administration of FDPIR and SNAP/FSP**. How do FDPIR programs conduct outreach, determine eligibility, and order, store, and distribute food? How much do FDPIR practices differ across regions, states, or reservations? What does each program do to provide nutrition education or promote native foods? Are FDPIR and SNAP/FSP colocated, or otherwise coordinated, with each other, with other food assistance programs such as WIC, and with non-USDA programs such as IHS, tribal TANF, Indian housing, and the economic development efforts of the Bureau of Indian Affairs?

4) **Compare possible effects**. Are there systematic differences in food security, nutrition, and nutrition-related health conditions (such as obesity and diabetes) between participants in FDPIR and participants in SNAP/FSP, or between American Indians who live where FDPIR is available and those who live where it is not?

Our ambitions with respect to this last objective were modest. This study provides a foundation, and suggests some topics, for future research on the effects of participation in FDPIR and SNAP/FSP for American Indians living on or near reservations. These future research projects might include collection of new data or random assignment experiments, both of which were beyond the boundaries of the research for this report.

II. RESEARCH METHODS

This study combined qualitative and quantitative approaches. The qualitative work included telephone conferences with regional administrators and site visits to FDPIR programs. The quantitative analysis used a microsimulation model to compare SNAP/FSP and FDPIR eligibility using baseline and alternative scenarios.

Telephone Conferences

Early in the project, we held telephone conferences with nine tribal administrators holding office or otherwise active in the National Association of Food Distribution Programs on Indian Reservations (NAFDPIR), and with FNS staff members who work with FDPIR from each of the six regional offices with programs.[9] The calls were conducted between January and March 2007. Discussion focused on the following topics:

- Differences in eligibility, benefits, and administration between FDPIR and SNAP/FSP
- Implementation differences across programs and reasons
- Types of foods available
- Access for both FDPIR and SNAP/FSP
- How people choose between the programs
- Causes of the decline in FDPIR enrollment
- Best practices
- Coordination with other programs on the reservation
- Suggestions for site selection

We drew heavily on information from the calls to narrow down the list of possible site visits and to develop data collection instruments for the site visit interviews and focus groups. The discussions also allayed the concerns of some tribal leaders about the intent behind our study.

We also conducted a telephone interview with the head of the Navajo Nation's FDPIR agency, to ensure that the report included the perspectives and experiences of the largest reservation in the U.S. and the second highest FDPIR enrollment, behind the non-reservation Cherokee Nation in Oklahoma.

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[9] FDPIR does not operate in the FNS Mid-Atlantic Region, which covers Delaware, the District of Columbia, Maryland, New Jersey, Pennsylvania, Puerto Rico, Virginia, and the Virgin Islands. There are no federally recognized tribes in any of these states and territories.

Site Visits and Qualitative Analysis

Qualitative analysis for the project was based on site visits to seven tribal food distribution programs. The site visits primarily addressed the third project goal of comparing the administration of FDPIR and SNAP/FSP, but we also obtained valuable information about eligibility, benefits, and potential health effects. The site visits included focus groups with FDPIR participants and interviews with administrators and staff from FDPIR, SNAP/FSP staff, and other tribal programs. Key topics included:

- Program operations: outreach; eligibility determination and enrollment; and (for FDPIR) ordering, storage, and distribution of food
- Nutrition education and health promotion
- Inclusion and promotion of native foods
- Coordination between FDPIR and SNAP/FSP
- Coordination with other food assistance programs (particularly WIC) and with other social service programs (TANF, IHS, Indian housing and employment programs)
- Staff perceptions of FDPIR and SNAP/FSP and understanding of each program's eligibility requirements and benefits
- Staff recommendations for improving access to healthy foods and traditional foods
- Participant knowledge of the two programs and perceptions of the differences between them
- Participant experience in FDPIR and in SNAP/FSP and factors affecting household participation (such as ease of access, benefit amount, and selection of foods)
- Participant use of other food assistance programs
- Participant concerns about healthy diet
- Participant interest in access to native foods
- Participant recommendations for improving FDPIR and SNAP/FSP

Site Selection

Site selection criteria included geographic variables, economic factors, and program characteristics. Geographic variables included the region of the country and, as a secondary consideration, the proximity of the selected site to another site. Economic factors included the unemployment rate and whether the tribe has gaming operations, which have expanded employment opportunities on some reservations either seasonally or throughout the year. The program characteristics we considered were the average monthly number of FDPIR participants, change in participation between 2002 and 2006, and participation in the Fresh Produce Program.

In addition, we considered recommendations for sites offered by FDPIR regional staff and representatives of NAFPDIR. Site selection recommendations from FNS regional staff and NAFDPIR representatives focused on obtaining a diversity of program delivery models and proximity to other tribes in order to maximize the number and range of programs that could be included in site visits.

The four programs we visited as primary sites are shown below. Three of the four site visits included more limited visits to nearby secondary sites, shown in parentheses.

- Lower Brule Sioux (Crow Creek Sioux), South Dakota, Mountain Plains Region
- Chickasaw Nation (Choctaw Nation), Oklahoma, Southwest Region
- Fond du Lac Band of Lake Superior Chippewa (Mille Lacs Band of Ojibwe), Minnesota, Midwest Region
- Sherwood Valley Band of Pomo Indians, California, Western Region

Visits to the secondary sites included key informant interviews and observation of food distribution sites, but we met with fewer informants at the secondary sites and did not conduct focus groups.

Table 4 summarizes characteristics of the seven programs we visited.

Geographic Factors. We selected one primary site from the four major regions of the FDPIR program. Given our limit of four sites, we focused on regions making up a greater portion of the FDPIR program.

After narrowing the list of potential sites, we considered whether a prime site was located within a reasonable distance to another program that could be a secondary site. Three of our four selected sites have at least one other tribe participating in FDPIR within a one- or two-hour distance. Visiting the secondary sites allowed us to gather data from seven food distribution programs within the same project budget.

Economic Factors. The four selected sites vary in terms of the unemployment rate among tribal members. On the low end, the unemployment rate in 2000 was 5.6 percent in the Chickasaw Nation, while it was 28.1 percent among the Lower Brule Sioux.

One limit to the representativeness of the programs we selected is that each of the tribes in the selected sites has gaming. The revenues derived from gaming, however, vary considerably. What tribes do with gaming revenues, and revenues from other business enterprises or resources, also varies. Mille Lacs, Fond du Lac, Crow Creek, and Sherwood Valley Pomo distribute per capita payments to their members. The Lower Brule Sioux, Chickasaw Nation, and Choctaw Nation do not distribute a per capita payment. These tribes instead reinvest gaming profits in tribal facilities or use the revenues to fund services such as education, health, and housing.

Program Characteristics. The four primary sites include two small programs (Lower Brule and Fond du Lac) and two large ones (Chickasaw Nation and Sherwood Valley). Including the secondary sites, average monthly participation numbers in FY 2006 ranged from 126 persons in Mille Lacs to 4,045 persons for the Chickasaw Nation.

Each of the primary sites underwent considerable change in participation between FY 2002 and FY 2006. We selected two sites with increasing participation (Lower Brule Sioux and Fond du Lac) and two with decreasing participation (Chickasaw Nation and Sherwood Valley).

Each of the selected sites except Mille Lacs participates in the popular Fresh Produce Program.

Field Work

We made one three- or four-day visit to each of the four primary sites. Three team members participated in the first site visit and two team members went on each of the others. The methodology and instruments for the site visits were approved by the Institutional Review Boards of the Urban Institute and the Chickasaw Nation Health System.

Semi-Structured Interviews with Administrators and Service Providers. At each of the primary sites, we interviewed the FDPIR administrator and other staff members such as intake/eligibility workers, warehouse managers, and nutrition education providers. We also interviewed SNAP/FSP local administrators in the county or counties that served the reservations we visited.[10] Based on our preliminary discussions with each site, we scheduled interviews with administrators of other programs serving the reservation and interacting with FDPIR and/or SNAP/FSP. These programs included IHS or Tribal clinics, WIC, and TANF. The number of interviews was determined by the number of program staff, the level of involvement of other tribal programs, and the number of county Food Stamp offices serving members of that tribe. Since some reservations span multiple counties, the selection of county offices was based on proximity to the tribal program and the number of tribal members served. Across all of the sites we conducted a total of 18 interviews with FDPIR and other tribal program staff; 25 interviews with county or state food assistance staff; and 15 additional brief meetings or interviews with tribal officials, support staff, and others. Site visit discussions were guided by semi-structured discussion guides permitting flexibility in adapting the interview guide to capture variation in program details, depending on the position of the respondent in the program and the objectives of the interview.

Visits to FDPIR Distribution Sites and Warehouses. These visits provided important context for understanding local FDPIR programs. We interviewed distribution and warehouse managers and staff and observed procedures and facilities. Interviews again followed a semi-structured format. The researchers used a common checklist to guide the observations of distribution sites and warehouses.

Visits to SNAP/FSP and FDPIR Enrollment Sites. Enrollment sites included FDPIR distribution sites and warehouses. We observed client enrollment/re-enrollment procedures guided by a checklist of items including signage and information that encouraged or discouraged program participation, co-location with other programs, and distance from the places where American Indians live or work. We also visited county social service offices, and one state office, that administer SNAP/FSP.

Client Focus Groups. An important question for this study is the degree to which reservation residents are deliberately choosing FDPIR or SNAP/FSP and, if so, why they are choosing one program over the other. To gain more insight into participant views about the two programs and

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[10] For the South Dakota site visit, we spoke by phone with state officials, who requested that we do so to avoid further demands on overburdened county staff.

about food assistance and nutritional needs, we conducted six focus groups: two at each of the primary sites with larger FDPIR programs (Chickasaw Nation and Sherwood Valley) and one at each of the sites with smaller programs (Lower Brule Sioux and Fond du Lac). The size of the focus groups varied from 4 to 14. Across the four sites, a total of 53 participants participated in focus groups, representing about 1 percent of FDPIR participants in each site. Eighty-seven percent of the participants were female. The age distribution of focus group participants was as follows: 23 percent under age 30; 46 percent were 30 to 49; 19 percent 50-59; and 12 percent over 60.

Focus group participants were responsible for food selection and preparation in their households. Seventy-five percent of the focus group participants were current FDPIR enrollees, some of whom had previously participated in SNAP/FSP. Another 9 percent were current SNAP/FSP enrollees, and 15 percent were currently in neither program but had been enrolled in one or the other in the past.

Focus group scheduling and participant recruitment was coordinated with the FDPIR director at each primary site in order to arrange focus groups at times and locations that would be most convenient for participants. Participation in the focus group discussions was completely voluntary. The information shared by participants was kept anonymous and the names of participants were not shared with anyone outside of the site visit team. Participants received a $25 payment to thank them for coming. The amount of compensation was set based upon prior research experience with food assistance program participants and was discussed with FDPIR directors to assure that the amount was a reasonable, but not excessive, incentive.

Quantitative Analysis

The CPS-ASEC and many other national surveys ask respondents about participation in SNAP/FSP. The survey data, however, do not directly measure eligibility. Still, much more information is available on participation in SNAP/FSP than on FDPIR, which is not covered in any national survey (Finegold et al. 2005).

To understand patterns of eligibility and participation in SNAP/FSP and FDPIR despite these limitations, we used the simulation of SNAP/FSP that is one component of the TRansfer Income Model, version 3 (TRIM3).[11] When the TRIM3 model is run, it applies the rules for determining eligibility and benefits, such as income limits and maximum allotments, to the record of each person in the CPS-ASEC survey data, much as a caseworker would do in real life. The estimates produced by the model include the simulated benefits, if any, for which that

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[11] Funding for the Urban Institute to develop and maintain TRIM3 is primarily from the Department of Health and Human Services, Assistant Secretary for Planning and Evaluation (ASPE). More information on TRIM3 is available at http://trim.urban.org. TRIM3 also corrects for the underreporting of participation in SNAP/FSP and other means-tested programs (Wheaton 2007), but we did not use that capacity in this study.

person would be eligible. Urban Institute staff annually update the national and state program rules in the model so they are accurate for the set of SNAP/FSP policies in place during a particular year.

TRIM3 also provides the capacity to model "what-if" policy scenarios. The actual national and state rules can be reset to other values to model eligibility and participation under those alternative rules. An example would be a simulation that raised the SNAP/FSP gross income limit from 130 percent of federal poverty guidelines to 150 percent. The results of the simulation would tell us how many more people would receive benefits, and how much the total benefits paid out would change.

We took advantage of the capacity for "what-if" simulations and used the TRIM3 SNAP/FSP module to model eligibility for FDPIR as well. We changed the rules for the 2005 SNAP/FSP baseline (the most recent available) to those for FDPIR in 2005. For example, we removed the gross income test for all households because FDPIR has no gross income test. Some of the rules for both programs would be different in 2009 due to policy changes in the 2008 Farm Bill or in ARRA.

We compared the results from the two simulations for the subset of the U.S. population most likely to be have access to FDPIR: people who live in FDPIR states, in households with at least one American Indian member, and in FDPIR service areas (on or near reservations or in Oklahoma tribal jurisdictions). The simulation results for this population (about one percent of the U.S.) inform our analysis of eligibility and participation. We estimated the average monthly proportion of this population eligible for SNAP/FSP only, for FDPIR only, or for both programs. For those eligible for either program, we estimated the proportions that would be better off (in terms of the monetary value of their benefits) with each program in the average month.

Limitations of the Study

Although sites were selected to include a range of programs with respect to size and geographic region, one limitation of the study is the small number of sites visited. To capture the diversity of settings, culture, tribal governance, and program models across the FDPIR would have required a much larger number of visits, well beyond the resources of this study. Within each site, we visited key program staff and the primary sites for service delivery, but were not able to visit all service delivery sites because of the large distances encompassed by some programs and the existence of mobile and temporary sites (such as tailgate distributions). The focus groups, while generally well-attended and highly informative, consisted of self-selected individuals responding voluntarily to flyers and announcements by FDPIR staff.

Reliance on the CPS-ASEC as input data for TRIM3 places limitations on the quantitative component of the study. Because the survey does not include any questions on residence on or near a reservation, the analysis of eligibility in Section III must rely on the CPS-ASEC data on county of residence. In order to protect confidentiality, however, these data are withheld from the public use file for many cases. This is particularly true for low-population rural counties, which are the ones most likely to have reservations. The result is that the analysis

assumes geographic eligibility for some American Indian households that actually live outside FDPIR service areas.

The CPS-ASEC also lacks any questions on FDPIR receipt. The analysis of participation in Section IV, therefore, necessarily focuses on hypothetical rather than actual cases.

III. ELIGIBILITY

Study Questions: Comparing eligibility in FDPIR and SNAP/FSP, how much difference do the differences in eligibility requirements for the two programs really make? How much do the eligible populations for the two programs overlap? Who, on or near the reservations, is eligible for FDPIR but not SNAP/FSP, and who is eligible for SNAP/FSP but not FDPIR?

To participate in FDPIR, one must generally live on a reservation that operates the program. Tribes may be approved to serve areas outside their reservation boundaries (near areas) that have concentrations of Native Americans. In these near areas, eligible households must include at least one enrolled member of a federally recognized American Indian tribe or Alaska Native Village. This person does not have to be enrolled in the specific tribe operating FDPIR in that service area. About 30 percent of participants live in the state of Oklahoma, which has special circumstances. The Osage Nation Reservation, the only reservation in the state, is subject to the standard rules, but other Oklahoma tribes operate food distribution programs within designated Tribal Jurisdictions, based on the boundaries of 19th century reservations that were subsequently dissolved. Applicant households that live within the Oklahoma Tribal Jurisdictions must include at least one enrolled member of a federally recognized American Indian tribe or Alaska Native Village to be eligible for benefits.[12]

A further limit on access to FDPIR is that residents of communities with populations of 10,000 or more cannot participate in the program unless that community is on a reservation, was already participating in the program when its population grew above 10,000, or has a waiver from FNS. The logic behind this rule is that places of that size normally have adequate access to grocery stores in which they can use SNAP/FSP benefits. FNS has granted waivers to isolated towns that are not near grocery stores and to places with Indian reservations or trust land within city boundaries. Federal statutes explicitly define certain areas of Oregon as on or near a reservation, and therefore authorized to participate in FDPIR.[13] Among the places in FDPIR states that are not covered by waivers are Rapid City, South Dakota and Duluth, Minnesota, two medium-sized cities located fairly close to some reservations and with substantial American Indian populations that may move back and forth between the reservation and the town depending on job opportunities.

SNAP/FSP has no such restrictions regarding location or tribal affiliation, but in other respects SNAP/FSP requirements are stricter—and more complicated—than those for FDPIR.

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[12] Because most of the programs in Oklahoma are not based on reservations, programs in that state are referred to as FDP (Food Distribution Program), rather than FDPIR.

[13] See, for example, the Klamath Indian Tribe Restoration Act (PL 99-398, August 27, 1986).

Studies by Usher et al. (1990), GAO (1990), and Davis et al. (2002) reported that American Indians on and near reservations perceived that it was easier to enroll, and stay enrolled, in FDPIR than in SNAP/FSP. We heard the same thing at our site visits from FDPIR participants, tribal officials, and some county social service staff.

Each program has the household as the unit for eligibility decisions and defines households in the same way. In either program, a household can be an individual living alone; an individual living with others, but purchasing food and preparing meals separately; or a group of people living, purchasing food, and preparing meals together. By this definition, there can be more than one household under the same roof. Spouses living together, however, cannot be in separate households, and children under 18 must be in the same household as a parent.

Income Limits

Table 5 compares the eligibility requirements of the two programs. Households in which everyone receives assistance from TANF, SSI, or (in some states) General Assistance are categorically eligible for SNAP/FSP or FDPIR, without regard to income or asset limits. Otherwise, to qualify for SNAP/FSP, households without any elderly or disabled persons must pass both a gross income test (130 percent of federal poverty guidelines) and a net income test (100 percent of federal poverty guidelines, after the standard deduction and other deductions are applied). Households with an elderly or disabled member are subject to the net income test only. FDPIR has no gross income test for anyone. The FDPIR net income limit is set at 100 percent of federal poverty guidelines, the same level as the SNAP/FSP limit, after a somewhat different set of deductions.

As Figure 3 shows, the absence of the gross income test allows households to remain eligible for FDPIR at higher earnings levels than for SNAP/FSP. These figures, for FY 2008, assume no unearned income and no deductions for dependent care, child support, medical expenses, or excess shelter costs. The difference is greatest for one-person units, who lose SNAP/FSP eligibility above $1,107, but earn up to $1,231 before their income, minus the standard and earned income deductions, exceeds the net income limit of $851. The $124 difference represents 15 percent of federal poverty guidelines, so the maximum gross income level for FDPIR is 145 percent of the guidelines. The difference in dollars is almost as high for a six-person household, which can have $123 in additional earnings under FDPIR rules, but that amount is only 5 percent of the federal poverty guidelines for a family of that size. Households of 15 or more, which are rare, hit the net income limit of 100 percent of poverty before they hit the SNAP/FSP gross income limit of 130 percent, so the maximum gross income level is the same for the two programs.

The two programs use the same standard deductions in calculating net income. SNAP/FSP deducts this amount from gross income while FDPIR adds it to the net income limit, but the effect on eligibility is the same. The deductions for dependent care (unlimited in both programs since the 2008 Farm Bill), child support (the legally obligated amount), and work expenses (20 percent of earnings) are also the same.

Both programs allow some households to deduct medical expenses, but do so in different ways. SNAP/FSP households with elderly or disabled members can deduct those members' medical expenses above a threshold of $35 dollars per month. FDPIR does not have the $35 threshold, but the only expenses that can be deducted are payments for Medicare Part B ($96.40 per person in 2008 and 2009) and Medicare Part D, the prescription drug benefit that began in 2006. Part D premiums vary widely, depending on the plan chosen, and may be covered by premium assistance benefits for low-income participants.

In determining net income, SNAP/FSP households can deduct shelter expenses, including utility costs, that are above 50 percent of net income after other deductions have been applied. FDPIR has no shelter deduction.

Figures 4 and 5 show how these differences in income limits and deductions affect the eligibility and benefits of two prototypical families. Families with no elderly or disabled members may be ineligible for SNAP/FSP due to the gross income limit, but eligible for FDPIR. Figure 4 depicts a family of four with no elderly or disabled members, no unearned income, and no deductions for dependent care, child support, or excess shelter costs. With earnings up to $180, the family is eligible for the full FY 2008 SNAP/FSP allotment of $542. Benefits then decline 24 cents for each additional dollar of earnings, until earnings exceed the gross income limit of $2,238.[14] FNS methodology suggests that the retail value of FDPIR benefits would be a flat $339.12 ($84.78 per person) until earnings exceed $2,330, bringing net income above the FDPIR limit, and the household is no longer eligible.[15]

For households that do include an elderly or disabled member, the gross income test is not applicable, and SNAP/FSP eligibility may extend to higher incomes due to the availability of the shelter deduction and the ability to deduct more in medical expenses. Figure 5 shows a family of four that includes two people age 60 or older, which exempts the household from the SNAP/FSP gross income test and allows it to deduct $465 of $500 in medical expenses for SNAP/FSP purposes. This household also reports $1,000 per month in unearned income from Social Security and $500 in monthly shelter costs. The family would be eligible for SNAP/FSP until its earnings exceeded $1,661, pushing net income above the FDPIR limit. FDPIR has no shelter deduction, and the Medicare Part B costs ($96.40 each for the two elderly members) are the only medical expenses that can be deducted.[16] As a result, FDPIR eligibility ends when monthly earnings exceed $1,321.

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[14] SNAP/FSP benefits are reduced 30 cents for each dollar of unearned income.

[15] Urban Institute calculations using the FNS methodology as presented in Kirlin 2007. The FY 2006 estimate in the FNS memo is $234.29 for a family of three. We divided this estimate by 3 to get a per-person estimate of $78.10, then converted that figure to FY 2008 dollars by multiplying it by the ratio of the Consumer Price Index for Food and Beverages for FY 2008 to the same Index for FY 2006.

[16] This calculation assumes that the household does not have to pay for Medicare Part D.

Some tribes draw on income from gaming, sale or leasing of resources such as timber and oil, or other economic enterprises to distribute monthly, quarterly, or annual per capita payments to their members. Federal regulations, based on language in statutes and treaties, exclude per capita payments from some of the nongaming revenue streams in determining eligibility for food assistance. FDPIR and SNAP/FSP handle the per capita payments that are not excluded in different ways. FDPIR counts the per capitas as unearned income in the month they are distributed. On some reservations, large numbers of people lose their eligibility for food distribution in those particular months. SNAP/FSP, in contrast annualizes per capita payments, spreading their value over all months in the year. This avoids disqualifying large numbers of participants at the same time. However, the per capita payments may push some households that are otherwise close to the SNAP/FSP income limits above those limits in *all* months. Households close to the income limits, however, are eligible for relatively small benefit amounts, so there may be few such households actually participating in the program when they are eligible.

Other Eligibility Rules

SNAP/FSP and FDPIR both set limits for assets ("resources") at very low levels. The FDPIR limits are $250 lower for multiperson households with no elderly or disabled members and $1,250 lower for single-person households and households that include a disabled person. Pending regulations, however, will make the FDPIR limits identical to those for SNAP/FSP (FNS 2008). Federal rules for SNAP/FSP count the market value of an automobile above $4,650 as a resource whereas FDPIR does not count automobiles at all. The importance of this difference has diminished in recent years because all states are now using the policy option of applying vehicle rules from TANF or other low-income programs to SNAP/FSP. The result in most states is that the full value of all vehicles is excluded from the resource tests (FNS 2009).

Since 1985, SNAP/FSP participants between the ages of 16 and 59 have been required to register for work, if they were not already working or in school. The 1996 welfare reform law, the Personal Responsibility and Work Opportunity Act (PRWORA) imposed more stringent requirements on a subset of those subject to work requirements. ABAWDs are the only group whose access to SNAP/FSP benefits is subject to time limits. Under PRWORA, unemployed people between the ages of 18 and 49 who are not disabled, and live in households without children, may only receive benefits for three months in a thirty-six month period. (ABAWDs are eligible for full benefits in months when they are working at least twenty hours per week, and enrollment during those months does not count against the time limit). ARRA, the 2009 stimulus bill, suspended the ABAWD restrictions until October 2010. FDPIR does not require registration for work, and does not have any time limits on assistance.

PRWORA also included a lifetime ban on benefits from SNAP/FSP or TANF for people who have been convicted of drug-related felonies. States can opt out of the drug felony restrictions; as of November 2007, 13 states enforced the lifetime ban, 22 modified it, and 16 had no ban at all (FNS 2009). Among the states in our site visits, Oklahoma and South Dakota have no ban and California and Minnesota have modified policies. The federal ban does not apply to FDPIR, so persons convicted of drug felonies, including a participant in one of our focus groups, can receive commodity packages if they meet other program requirements.

Simulation of FDPIR and SNAP/FSP Eligibility

To understand the impact of differences in rules regarding income, assets, ABAWDs, and service areas, we modeled both programs in TRIM3. SNAP/FSP rules are from the 2005 Food Stamp Program baseline simulation, the most recent simulation available for public use. We modeled FDPIR by changing those rules where appropriate.

The primary universe for this analysis is limited to households in FDPIR states; not in identified non-FDPIR cities or counties; and including at least one person who self-identified as an American Indian or Alaska Native, alone or in combination with other races. This universe, which represents about one percent of the United States, is likely to be larger than the population actually living on reservations, or living in nearby service areas with an enrolled tribal member in the household. Some of the CPS-ASEC cases are in cities larger than 10,000, counties that are not near any reservations, or counties near reservations that do not participate in FDPIR. These cases, however, cannot be excluded because the public-use CPS-ASEC withholds county and city information for many households to protect respondent confidentiality. Virtually all of the true FDPIR service population, however, should be included in these data.

Table 6 summarizes simulated average monthly eligibility for FDPIR and SNAP/FSP. Slightly less than one-third of the households are eligible for at least one of the programs. Almost all households simulated as eligible for SNAP/FSP are also eligible for FDPIR. The exceptions have high shelter and/or medical expenses that get them below net income limits for SNAP/FSP, but not for FDPIR, which has a more limited medical deduction and no deduction for excess shelter costs. A majority of these households include elderly members. Households simulated as eligible for FDPIR, but not for SNAP/FSP, are more common. These households are either composed of ABAWDs or have gross incomes that fall in the narrow range between the effective income limits of the two programs, as seen in Figure 3. Overall, 85 percent of the households that are eligible for either program are eligible for both.

The same crosstabulation produces similar results for two populations that are more narrowly defined. As the survey population more closely resembles the population with access to FDPIR, the proportion eligible for the two programs increases. The second panel of Table 6 shows eligibility for FDPIR and SNAP/FSP with the additional restriction that the household must include a natural-born citizen who identifies as American Indian or Alaska Native, and did not identify as any other race. This universe, about half the size of the first one, is more likely to exclude some people who do live in FDPIR service areas. On average, however, people identifying as American Indian or Alaska Native alone are more likely to live on or near reservations than people who give multiracial responses. Economic conditions for this universe are worse than for Universe 1, as shown by the higher proportion qualifying for at least one of the nutrition assistance programs. The correlation of FDPIR and SNAP/FSP eligibility is about the same as for Universe 1, except that even fewer households are eligible for SNAP/FSP but not FDPIR. An estimated 84 percent of the households eligible for either program are eligible for both.

Universe 3, shown in the third panel of Table 6, is defined by the added restriction that the American Indian/Alaska Native member of the household reported IHS coverage on the CPS-ASEC. This condition is too restrictive because IHS coverage, like other forms of health

coverage, is underreported.[17] Those who do report it, however, are particularly likely to live on or near reservations. Among this population, 44 percent qualify for at least one of the programs, and 91 percent[18] of those who qualify for either are simulated as eligible for both.

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[17] The Census Bureau, it should be noted, does not consider IHS coverage to be insurance. Some of the respondents may be reporting service from the urban clinics that IHS operates in some cities with large American Indian populations, but others living near these clinics will be identified by city or county and screened out of the universes for these simulations.

[18] 39.6 percent / (39.6 percent + 0.4 percent + 3.8 percent)

IV. PARTICIPATION

Study questions: Comparing participation in FDPIR and SNAP/FSP, how do people who are eligible for both programs make the choice? Are the elderly more likely to be in FDPIR than other American Indians, and if so why? Do calculations of expected benefits dominate decisionmaking? How common is it for participants to switch back and forth between FDPIR and SNAP/FSP, in response to their circumstances that month? Why is the FDPIR caseload declining?

About 85 percent of the people who would be eligible for either FDPIR or SNAP/FSP are eligible for both. What determines the choice between programs, among people who have a choice? The size of the benefit for which the household would qualify is certainly a factor, but administrators and participants suggest that the ease of enrollment, cultural compatibility, choice in food selection, and access to grocery stores also appear to affect participation decisions. Some households switch back and forth between the programs in the course of a year. While it is difficult for an eligible person to take all these factors into account in deciding which program to use, the focus groups suggest that an informal communication system communicates (correctly or not) the relative benefits of FDPIR and SNAP/FSP.

Benefit Values and Participation

A simple model of the joint participation decision would be that the household participates in the program that offers higher benefits that month. Computing the value of SNAP/FSP electronic benefits begins with the maximum allotment, which varies by household size. It is based on the USDA Thrifty Food Plan, designed to meet nutritional goals at minimal cost. Households with no net income after subtracting for the standard deduction and deductions for dependent care, child support, medical expenses, and shelter costs receive the full benefit. Other households receive the maximum allotment minus 30 percent of net income. (Twenty percent of earnings are deducted at any income level, making the effective benefit reduction rate 24 percent for earned income). If the resulting amount is less than the minimum benefit ($16 as of April 2009), and the household has one or two people, the benefit is set at the minimum level.

The size of program benefits as income approaches eligibility limits may be particularly important among the elderly, who often have some income from Social Security or Supplemental Security Income (SSI) and, therefore, qualify for less than the maximum SNAP/FSP benefit. Within the general population, the expectation that SNAP/FSP benefits will be low contributes to a chronically low participation rate among the eligible elderly (Wilde and Dagata 2002). In two recent SNAP/FSP pilot projects (both in non-reservation areas), a commodity package based on the FDPIR package was made available as an optional alternative to conventional SNAP/FSP benefits. One of the pilot programs had operational problems and showed no effect on elderly takeup, but takeup increased in the other pilot. The costs of providing the commodity benefit alternative were too high for FNS to adopt this approach generally (Cody and Ohls 2005).

American Indian elders residing on or near a reservation, however, may have the option of receiving commodities from FDPIR instead of EBT benefits from SNAP/FSP.

Computing FDPIR benefits is easier: if the household is eligible, all eligible members receive a standard package. The FNS estimate for the FY 2006 retail value of the package for a 3-person household was $215.06 (Kirlin 2007). The maximum SNAP/FSP allotment for a household of the same size is substantially higher (see Figure 6). For households of one to four people, the median SNAP/FSP benefit, measured among a comparable population of American Indian households in FDPIR states, is also noticeably higher than the estimated value of the FDPIR food package.[19] For families eligible for the minimum SNAP/ESP benefit, FDPIR offers considerably more. The value of the FDPIR package comes closer to median SNAP/FSP benefits for larger households than for households of one to four, and actually exceeds the median benefits for households of seven or eight.

Returning to Figure 4, for FY 2008, SNAP/FSP benefits for a family of four with no unearned income begin at the maximum allotment of $542 and remain at that level until earnings exceed $180. Benefits are then reduced by 24 percent of earnings until earnings reach the gross income limit of $2,238, at which point the family is eligible for $48 worth of monthly benefits. The family is eligible for FDPIR benefits, worth an estimated $339, until earnings above $2,330 cause it to exceed the net income test. Comparing the two programs, if this family has earnings of $0 to $1,024, it is eligible for both programs and better off with SNAP/FSP. With earnings of $1,025 to $2,238, it is eligible for both programs and better off with FDPIR. From $2,239 to $2,330, it is only eligible for FDPIR.

For the family in Figure 5, the value of the FDPIR package and the SNAP/FSP maximum allotment are the same as in Figure 4. This family is exempt from the gross income test and it can claim deductions for medical expenses and excess shelter costs. SNAP/FSP benefits exceed the value of the FDPIR package until earnings exceed $491. The family is better off with FDPIR until eligibility for the food distribution program ends at earnings of $1,321. The ability to deduct additional medical expenses extends SNAP/FSP eligibility until earnings exceed $1,661. At that earnings level, the family is eligible for $26 in benefits. The excess shelter deduction, based on housing costs above 50 percent of net income, has no effect when earnings exceed $758.

The TRIM3 estimates in Table 7, which are consistent with the eligibility estimates previously shown in Table 6, suggest that a majority of households eligible for both programs would receive larger benefits from SNAP/FSP than from FDPIR. By the FNS methodology, the FDPIR package had a retail value of $76.33 per person in FY 2005, and that is the value used for estimates in the first column. Households with aged or disabled members tend to do better with

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[19] Urban Institute analysis of Food Stamp Program Quality Control data for FY 2006. These calculations do not include data for Alaska, which enrolled its first FDPIR participants in FY 2007. The FDPIR benefits shown are based on the FNS estimated retail value of the food package value of $78.10 per person in FY 2006 (Kirlin 2007).

FDPIR because fixed income from Social Security or SSI may leave them eligible for only a small SNAP/FSP benefit. Households without aged or disabled members tend to do better with SNAP/FSP, whether they have children or not.

Kirlin (2007) suggests that the FNS estimate for the value of the FDPIR package may be too low because it is based on national retail prices; the foods in the package may cost more on reservations where the only place to buy food is a convenience store. Alternatively, for comparison with SNAP/FSP, the FNS estimate of the retail cost of the FDPIR package may be too high. The subjective value to a consumer of a bundle of foods she chooses for herself, and buys in the supermarket with SNAP/FSP benefits, will always be greater than the value to her of an FDPIR package that is worth the same amount but offers her less choice (the importance of choice to the study participants is discussed below). The FDPIR package would have to have a higher retail cost than the package bought with SNAP/FSP for the two options to be of equivalent value to the recipient, who would then be indifferent between them. The second column of Table 7, with the value of FDPIR benefits reduced by $26.33, to $50.00, and the third column, with the value increased by the same amount, to $102.66, show that the estimates of the proportions better off from each program are quite sensitive to the assumptions about the value of FDPIR.

Other Factors Affecting Participation

Though they did not make strict dollar comparisons, program administrators and participants discussed the benefit comparison with us. They also identified other factors influencing participation decisions: 1) ease in enrollment and continued participation; 2) milieu/cultural compatibility; 3) choice in food selection, and 4) access to stores with competitive pricing and wide selection, with access including both distance and availability of transportation. Many stressed that it is easier to enroll in FDPIR than in SNAP/FSP, which requires more documentation. The relative proximity of FDPIR enrollment sites and county SNAP/FSP offices has an impact, as does the milieu at these places.

SNAP/FSP enrollment usually requires a visit to the county assistance office. Some states and tribes have developed ways to improve access, including county personnel visiting tribal offices on a regular schedule (weekly, on some reservations) to enroll SNAP/FSP clients; tribes providing transportation to the county office; and tribes assuming some of the enrollment paperwork, with final eligibility determination made by the SNAP/FSP office. In Minnesota, the Mille Lacs Band, which we visited, administer food assistance to participants in the tribal TANF program. While the procedures and extent of coordination vary among states and tribes, there is often a time lag and/or an additional trip involved in SNAP/FSP enrollment. The current structure also means that it is not possible for one worker on the reservation to counsel clients and facilitate enrollment for both SNAP/FSP and FDPIR.

Cultural and historical factors are key aspects of the milieu. Some FDPIR staff and participants said that they do not feel welcome or comfortable in county offices. This sense seems to have roots in a long history of conflict with and discrimination against American Indians/Alaska natives by non-native individuals, political entities (states, counties, and municipalities), and other organizations. In contrast, the FDPIR offices are located on the

reservation, are staffed by tribal members, members of other tribes, and non-native people. Most of the offices we saw have culturally-compatible decorations, educational materials, etc., that may make FDPIR participants feel welcome and at home.

Improved economic conditions on some reservations and the expansion of Wal-Mart and other retail chains have increased access to supermarkets and grocery stores that offer far better prices and wider selection (coupled with the greater choice inherent in SNAP/FSP) than the on-reservation convenience stores with which they compete. This increases the value of SNAP/FSP benefits and thus the likelihood that eligible households will choose to enroll in that program rather than FDPIR. At several of the sites we visited, however, either FDPIR staff or tribal Community Health Representatives (CHRs) provide home delivery to aged and disabled participants; supermarkets may not provide home delivery, or may deliver only with additional fees.[20] We also heard that some of the elderly enjoy the visits of the FDPIR staff or CHRs that deliver the food, and that these individuals will help by putting the food away in their cabinets.

Home delivery is only one of the factors contributing to a preference for FDPIR over SNAP/FSP among the elderly. SNAP/FSP benefits are provided through EBT, and some people age 60 and over may be less comfortable using the cards than their younger counterparts. Tribal FDPIR offices are more likely to have staff fluent in native languages than county SNAP/FSP offices, and elderly American Indians are more likely to need this help. Most FDPIR foods require some kind of cooking, and seniors are more likely to know how to cook.

Respondents' comments about the role of stigma in participation decisions differed. Some potential participants see SNAP/FSP as undesirable "welfare," but do not view FDPIR the same way. In fact, a few FDPIR staff members and participants said that the "commodities programs" are not welfare programs, but treaty obligations, accepted by the tribes in exchange for the cessation of hostilities and the ceding of tribal lands to the United States. Staff at one program, however, said that some people prefer SNAP/FSP because it offers greater privacy: use of the EBT card is more private than picking up commodities from program distribution sites.

Different approaches to outreach can also lead people to enroll in one program over the other. Outreach efforts are discussed in the program administration section of the report.

Switching Between Programs

Administrators' estimates of the proportion of FDPIR recipients who moved back and forth between that program and SNAP/FSP ranged from "not too many" to 10 or 20 percent. Comments from focus group participants were consistent with this range. Some participants are better off with different programs in different months because of volatility in employment that

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[20] CHRs are community-based paraprofessionals within the Indian health system. Their myriad duties include visiting clients in their homes, making referrals, and coordinating health promotion and disease prevention initiatives in their communities.

produces fluctuations in monthly income. Others are ineligible for SNAP/FSP in some months due to the ABAWD rules. Volatility in eligibility and benefits, therefore, would lead us to expect a significant proportion of participating households to switch programs once or more during the year.

There are other reasons to switch between the programs. Some respondents told us they switch from FDPIR to SNAP/FSP when they want to load up on staples such as coffee or sugar that are not included in the food distribution package. They move back to FDPIR when their supply of that program's foods run low or because they get more food (though fewer options) than with the SNAP/FSP.

Switching is seasonal on some reservations. Climate extremes such as cold, snowy, icy winters or high desert temperatures make transportation difficult, causing some SNAP/FSP participants to lose access to stores in town that offer good prices and variety compared to on-reservation convenience stores. They thus switch to the closer FDPIR, returning to SNAP/FSP when the weather gets better. Both FDPIR staff and participants said that during summer and other periods when school is not in session, parents switch from SNAP/FSP to FDPIR because a greater quantity of food is available and because the children cannot participate in school nutrition programs. This is especially true on the Navajo and other reservations where many children attend boarding schools. Conversely, but less often, some of the respondents in our focus groups reported switching to SNAP/FSP at holiday breaks and during the summer in order to purchase convenience foods for their school-age children.

Switching between programs means increased paperwork for both administrators and participants. Our interviews did not address the additional administrative burden that participant switching produces.

The long-term trends, as shown in Figure 2, are that participation in SNAP/FSP is increasing while participation in FDPIR was declining until recently. Our seven case studies suggest that improved access to supermarkets and grocery stores, increased preferences for convenience foods, and reduction of the stigma attached to receipt and use of SNAP/FSP benefits are all pushing people who live on reservations toward that program instead of FDPIR. Because of the different benefit structures, however, there will always be some households for whom FDPIR provides so much more in benefits that participation in food distribution makes economic sense. Moreover, climate conditions, the lack of reliable transportation, and the distance to stores that stock a wide selection of competitively priced foods make FDPIR critical to large numbers of eligible persons residing on reservations.

V. PROGRAM ADMINISTRATION

Variation among programs in the number of participants and the extent of their service areas contributes to differences in program administration, including program structure, outreach, inventory and delivery modes, nutrition education, and partnerships. This section will describe the program structure, administrative lead, service areas, and outreach activities of the FDPIR programs visited and the SNAP/FSP programs in those service areas. We visited one county SNAP/FSP office in California, three in Minnesota, and three in Oklahoma, and we spoke with the State SNAP/FSP Administrator in South Dakota. Other program functions specific to FDPIR, including inventory and commodity deliveries and distribution modes, are presented in the last part of this chapter.

Structure, Administrative Lead, and Service Area

Structure and Administrative Lead

Telephone calls to regional FNS staff indicate that programs within a region are not necessarily administered in the same way. For example, the Southeast and Mountain Plains regions have both state- and tribally administered programs; the Western region has state- and consortium-run programs.

Our study sites also demonstrate a range of program structures. Sherwood Valley Pomo FDPIR is located within one rancheria but also serves 19 others over a large area in northern California. In contrast, the programs in the South Dakota study sites each were run at the tribal/reservation level for benefit of the local tribe as well as other eligible persons residing on the reservation. Both the California and South Dakota sites, however, were similar in that the programs stand alone organizationally; they are not part of a larger tribal or regional human services administrative unit.

FDPIR programs we visited in Minnesota and Oklahoma coordinate with the tribes' human or social services departments as one of a number of social service programs offered. These programs are similar to those in South Dakota in that they serve their tribal members and other qualified clients rather than serving a number of tribes like the California program does. Each of the two Oklahoma programs we visited serves a rural and dispersed client base within its tribal jurisdiction.

Like FDPIR, SNAP/FSP is a federal program. States vary in the extent to which administrative responsibility resides at the state level or is devolved to the counties. In California and Minnesota, SNAP/FSP is administered at the county level following state regulations. SNAP/FSP is state administered in Oklahoma and South Dakota. In three of the four states visited (California, Minnesota, and Oklahoma), services are provided at the local level through county offices. South Dakota administers its SNAP/FSP program though eight regions, which offer both full-time and itinerant offices. All county offices visited were part of human services offices that also provided eligibility services and administration for TANF, emergency services, Medicaid, and other federal and state assistance programs.

Service Area

Regional staff talked about the diversity in size of areas served by FDPIR and our study sites appear to capture the range. On the small end, the Crow Creek Sioux (South Dakota) program serves households in one county and the Lower Brule Sioux serve clients in a three-county area. Both serve households on and off reservation. Fond du Lac (Minnesota) serves clients living on or near reservation lands in two counties, while Mille Lacs serves a six-county area.

Programs in Oklahoma and California tend to have larger service areas. The Oklahoma programs serve clients in areas covering 13½ counties (Chickasaw) and 10 ½ counties (Choctaw). The Sherwood Valley Pomo program in California serves a very large five-county area, with some sites located more than four hours from the main office and warehouse. The Navajo Nation's program serves parts of Arizona, New Mexico, Utah, and Colorado.

SNAP/FSP service areas are delineated by county, or regions in the case of South Dakota. Service area boundaries are not necessarily the same as reservation boundaries or FDPIR service areas. When reservations span more than one county, as is often the case, tribal administrators need to coordinate with multiple county offices. For example, the office in Carlton County, Minnesota serves the parts of the Fond du Lac Reservation that are in Carlton County. The St. Louis County, Minnesota office serves the parts of the Fond du Lac, Bois Forte, and Vermillion Reservations that are in St. Louis County. Individuals in Minnesota must obtain services from the offices that serve their county of residence. Because this means that clients cannot always go to the office that is closest to them, the state has explored the possibility of establishing a regionalized system.

In Oklahoma, the Pontotoc County and Carter County offices serve many SNAP/FSP participants from the Chickasaw Nation. The Pontotoc County office is located in Ada, which is also the location of the Chickasaw Nation tribal government headquarters. The Carter County office is located in Ardmore, just a short distance from the location of the Chickasaw Nation Food Distribution Program and nutrition services building. However, the Chickasaw Nation's jurisdictional territory encompasses all or parts of 13 Oklahoma counties, and SNAP/FSP applicants must apply at the county office where they reside.

Outreach and Access

Staff at the California and South Dakota food distribution programs reported that they do little or no outreach. In their view, outreach is not a priority because FDPIR is known throughout the communities served. The primary means of reaching people is word of mouth.

Food distribution programs at the Minnesota and Oklahoma sites place articles in tribal newspapers and on tribes' websites. Other activities include distributing information at health fairs and making sure program applications are available in offices of other tribal programs. The Choctaw Nation's nutritionist conducts cooking demonstrations at stores, distribution sites, and health fairs. The demonstrations are part of the nutritionist's regular job activities rather than special outreach activities per se but their effect is to increase awareness of the program.

With respect to SNAP/FSP outreach and access, only the Pontotoc County, OK office indicated any special efforts to target Native Americans. Its staff works with the Chickasaw Nation on community health fairs, and county medical outreach workers stationed at the Carl Albert Indian Health Facility conduct SNAP/FSP outreach along with their other duties.

The number and location of county offices varied across the sites visited. For example, Mendocino County, CA, has two full service SNAP/FSP offices and one county office that can print EBT cards but cannot do intake. In Minnesota, Carleton County has two offices and St. Louis County has four human services offices. The Fond du Lac Reservation and other programs are close to the Carlton County office, which makes access across programs easier. In the past, Minnesota Department of Human Services operated in more locations, but there was a consolidation of local offices over ten years ago, and they no longer outstation workers to other locations to take applications or conduct intake interviews. Several SNAP/FSP offices are located within the boundaries of the vast Navajo Nation.

As part of national efforts to modernize and improve access to the SNAP/FSP program, the states we visited have instituted policies and procedures to reduce required visits to county offices for application and recertification. These include obtaining applications by mail and on-line, mail-in or telephone reporting of changes, and recertification by telephone for those who are unable to come to the county office due to disability or other hardship. Still, FDPIR staff and participants cited access barriers as a reason that some eligible reservation residents do not use SNAP/FSP.

Inventory and Commodity Deliveries

The staff of the relatively small programs in Minnesota and South Dakota spend considerable time monitoring commodity availability in order to increase the likelihood they will get the food they want. They believe that they are at a disadvantage relative to large programs when it comes to getting scarce commodities. While it benefits them that the ordering system allows them to monitor availability of items and update their order throughout the month, it also means they spend more time on this task than they did in the past.

Two programs expressed satisfaction with the delivery company for canned and dry goods. One program was less happy with the new delivery company for fresh produce because it can only place orders once a week; with the previous company, orders could be placed twice a week.[21] The change in companies and their ordering process means that clients who pick up commodities later in the week might miss out on certain items that run out early. Each time a new company is contracted with, drivers have to learn the roads and the time needed to reach some of the remote areas.

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[21] The Department of Defense, Defense Supply Center Philadelphia, the FNS contractor for the Fresh Produce Program, contracts in turn with local firms for produce delivery.

The Chickasaw Nation Food Distribution Program was the only one we visited that said its distributor delivers to more than one site. Each of the three Chickasaw warehouses receives commodity deliveries directly. The Choctaw Nation Food Distribution program also has more than one warehouse, but it receives the commodities at the main warehouse. Program trucks then make deliveries to the other three warehouses.

Distribution Modes

From both regional calls and site visits, it is clear that program and service-area size affects the modes of commodity delivery. The larger the area and the client base, the more options a program offers, as would be expected. Commodities at each site we visited are distributed through client pickup for the vast majority of participants. Clients drive to the program warehouse, tailgate site, or store to order and obtain their food. Most programs also offer assistance to elderly clients and those who are disabled, and in one site, to anyone whose vehicle will not start during the winter.

Warehouse Pickup

With warehouse pickup, FDPIR participants (or their designees) get their packages at the main warehouse. Participants in programs with more than one warehouse, including the two Oklahoma programs we visited, can also pick up at a satellite warehouse in another location that may be more convenient.

Warehouse pickup is the primary means of distribution according to regional staff, and this was evident during our site visits. The FDPIR agency at each of our seven sites distributes some of its food at the warehouse. At the Fond du Lac, Mille Lacs, Lower Brule, and Crow Creek programs, a majority of the clients pick up their commodities at the warehouse. The Mille Lacs program allows clients to call in orders prior to pickup. Clients also can ask staff to fill the same order placed the previous month. The program staff call this “autofill.”

Tailgate Pickup

With tailgate pickup, participants get their commodities from a truck that parks at a specific location, generally once a month. Tribal clinics and community centers such as the Navajo Nation’s chapter houses, which provide multiple services, are common tailgate sites.

Tailgate pickup is the second most commonly cited mode of distribution, and the primary mode for the Sherwood Valley Pomo program. Tailgating is offered at the three large programs we visited (Sherwood Valley Pomo, Chickasaw Nation, and Choctaw Nation) and one of the four smaller programs (Mille Lacs). Sherwood Valley Pomo has the largest number of tailgate sites (19) among the study sites. Both Oklahoma programs had many more sites before they opened the stores, described in the following section. The Chickasaw dropped from 16 tailgate sites to two; the Choctaw dropped from 19 to four sites. The Crow Creek Sioux ended their tailgate option in the mid-1990s. This has led to a loss of clients who live more than 30 miles from the warehouse.

Weather can affect tailgating. The administrator of one Midwest Region program, interviewed by telephone, told us that the program delivers commodities to homebound clients year round, but cuts back its tailgate option during the coldest winter months.

Store Pickup

Some food distribution programs in Oklahoma and New Mexico use the store model of distribution. Available foods are arranged in open shelves and participants can inspect and compare different items before making their choices. The stores are designed to be attractive and similar to a commercial supermarket experience. The amount that the shopping participant can select within each category of FDPIR foods is determined by the same monthly distribution guide rates that govern the other distribution modes.

Stores are the primary distribution mode for the Chickasaw Nation and Choctaw Nation programs. Chickasaw staff said that most clients come to the store themselves or have someone bring them even though the area served is large. The stores are very popular with both staff and customers.

Delivery/Assisted Pickup

Four of our seven sites (Chickasaw Nation, Fond du Lac, Crow Creek, and Lower Brule) reported delivering commodities to elderly and disabled clients who cannot pick up commodities at the warehouse, tailgate sites or stores. In the other programs we visited, customers with transportation problems often rely on friends, neighbors, or relatives to pick up their commodities.[22] Staff at the Sherwood Valley Pomo and Mille Lacs sites said they allow clients to send another person to pick up commodities as long as the client notifies the program in advance or sends the required written notice. The Sherwood Valley Pomo, Chickasaw Nation, and Choctaw Nation programs make use of tribal CHRs, who can either bring elderly or disabled clients to the stores or pick up commodities for them and deliver the food.

Some programs offer expanded delivery services during bad weather. The Standing Rock Sioux in the Mountain Plains region make deliveries to the elderly, pregnant women, and households without transportation. During the winter, staff also delivers to clients whose cars won't start due to the cold.

The Chickasaw and Choctaw Nations provide transportation to bring some clients to their food distribution stores. Under a state-funded program, food distribution staff can cook, help clean the house, and assist in picking up commodities for elderly or disabled individuals.

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[22] FDPIR regulations allow (and encourage) households to authorize someone to pick up their food in case they are unable to do so themselves. The authorization is made in writing and the information is kept in the household's case file. The authorized representative must present identification at time of food pickup. Under program rules, volunteers may be used for home delivery for the elderly and disabled.

Nutrition Funds and Education Activities

Funding

There was near-consensus from the regional calls that funding for nutrition education is insufficient to meet the needs of the population served. Our visits, however, preceded the allocation of $1 million for FDPIR nutrition education in FY 2008 and FY 2009, which funded the awards to the Crow Creek and Sherwood Valley programs shown in Table 2.

In addition to FDPIR funds, two of the tribes we visited (Fond du Lac and Chickasaw Nation) applied for and received SNAP-Ed/FSNE grants from their state SNAP/FSP agency, as part of the state's proposal for SNAP-Ed/FSNE funds. Some of the FDPs rely on partnerships with other agencies, which are better funded, to supplement the resources they have for nutrition education services. Entities mentioned include Head Start, WIC, SNAP/FSP, IHS, and county extension services.

Nutrition Education

Programs engaged in both active and passive nutrition and health education efforts. Active efforts include cooking demonstrations, taste tests, cooking competitions among clients ("cook offs"), activity and wellness programs for children and adults, and special events, such as health fairs and the Cahto Coast Walk (California). Passive activities include displaying nutrition-related posters in offices, warehouses, tailgate sites, and stores. Programs also offer clients print materials such as recipe cards, cookbooks, calendars, newsletters that contain nutrition information, nutrition handouts, and handouts or pamphlets on specific diet-related health conditions such as diabetes and obesity, diabetes, and heart disease.

Some sites have hired a nutritionist, dietitian or a Nutrition Education Assistant (Choctaw hired a nutritionist with FDP funds) or have access to nutrition experts from other programs. The Chickasaw Nation food distribution program is part of Nutrition Services within the Chickasaw Nation Health System, and as such, has access to nutritionists on the food distribution staff as well as in WIC and the health system's nutrition counseling services. The tribal health clinic in Willows, California that serves as a tailgate site for the Sherwood Valley Pomo program includes a nutritionist who works with the participants who make their monthly pickup there. Staff from the Crow Creek program contact the dietitian at the IHS office when they need nutrition information.

The sites vary in the breadth and depth of their health and nutrition efforts. Of the seven programs we visited, the two in South Dakota offer the most limited nutrition education. Lower Brule Sioux staff are working on a cookbook, have nutrition posters displayed in the warehouse, and offer copies of a health-related newsletter. Staff said they would like to be able to offer cooking classes or demonstrations. The Crow Creek Sioux FDPIR staff offer taste tests and recipes for clients about once a month. They also have nutrition posters in the warehouse, offer copies of a cookbook and a newsletter, and have produced a flier on obesity that addresses how to recognize it, the relationship between obesity and asthma, and suggestions for healthy eating and drinking.

At the other end of the continuum are the two Oklahoma programs. Nineteen tribes in the state pool their nutrition education dollars; the FNS nutritionist in Oklahoma City manages the dollars statewide. The Chickasaw Nation's SNAP-Ed/FSNE grant funds cooking demonstrations in the Chickasaw service area for both FDP and SNAP/FSP clients. Each of the three FDP stores has cooking shows twice a day for two days each week. The shows are scheduled in a series with themes or learning tracks, and DVDs of the shows are available. In addition to the cooking shows, there are other demonstrations where samples and recipes are handed out. Nutrition services staff of the Chickasaw Nation are learning to use a new software program for a wellness initiative; the software can be used to track diet and activity. FDP staff also offer recipes and other nutrition education materials to clients. The Choctaw FDP hired a certified nutritionist in 2007 who conducts cooking demonstrations at FDP stores. In Oklahoma, SNAP/FSP clients of any race can also participate in the nutrition education activities offered by Oklahoma State University's extension program.

Programs in California and Minnesota fall between these limited and more extensive nutrition education efforts. The three programs offer cooking demonstrations, taste tests, and a range of print materials, as well as special event offerings. Sherwood Valley Pomo staff mentioned the Cahto Coast Walk, a traditional event that includes nutrition education, and an annual cook-off during Big Time, a celebration similar to the Powwows held by other tribes. Each month, the nutritionist at the clinic that serves as a tailgate site for the Sherwood Valley Pomo program offers a taste test and provides the recipe used and a sheet with nutrition information for commodity items.

At Fond du Lac, site visit informants said that the Program began focusing on nutrition education about five years ago. A Nutrition Education Assistant works with FDP, SNAP/FSP, and WIC clients. She works from the tribal health clinic for the most part, but also visits the FDP and WIC program. The Nutrition Education Assistant holds cooking demonstrations at FDP and the FDP program distributes handouts and flyers on healthy eating when cooking with commodities, diabetes prevention, and exercise. They also provide cookbooks with healthy recipes. The Milles Lac FDP has sponsored cooking classes by the tribal Public Health Department's "Diabetes Team," which helps to meet the medical and nutritional needs of people with diabetes. The FDP has donated foods for these classes so that participants can learn how to prepare healthy meals with commodities.

A number of programs work with WIC or other health-related programs to supplement nutrition and health efforts. These partnerships are described in the next section.

Relationships and Partnerships

SNAP/FSP

The relationship between FDPIR and SNAP/FSP is limited to sharing of client lists, for the most part. Each of our study sites indicated that the monthly contacts to ensure clients are not enrolled in both programs were the extent of their partnership. SNAP-Ed/FSNE grants provide some of the funding for the nutrition efforts of the Fond du Lac and Chickasaw Nation programs, in which clients of both programs can participate.

Partners & Co-location

Every program we visited except the Lower Brule Sioux mentioned at least two other entities with whom they partner, or to whom they turn for resources of some type, at least on occasion. Most of the partnering entities are programs, clinics, or outreach services that, like FDPIR, are administered by the tribes. Program staff did not necessarily refer to these entities as partners as such, but talked about connections between FDP and other programs or services.

The tribal WIC program at the Fond du Lac reservation provides one-on-one nutrition education during client appointments, and the Nutrition Education Assistant serves WIC and FDPIR clients as well as working in the tribal clinic. Funding for the Assistant comes from SNAP-Ed/FSNE. Tribal WIC, Head Start, Early Head Start, and FDPIR work closely together. The tribal clinic has dietitians who provide diabetes counseling and a Watchers Program. For exercise, the tribe provides weight rooms at two locations and an Olympic-size indoor pool.

FDPIR is part of the Mille Lacs Band's Department of Health and Human Services, which also includes a tribal TANF program and the tribe's Public Health Department. The Diabetes Team Program, which organizes some cooking classes sponsored by FDPIR, is part of the Public Health Department. The team includes a Diabetes Case Manager, Diabetes Nurse Educator, a Community Diabetes Representative, a Registered Dietitian, and a physician. Another example of organizational collaboration is that the Great Lakes Indian Wildlife Commission provides fish and wild rice donations to Mille Lacs FDPIR participants.

Staff from the Crow Creek food distribution program turn to an IHS dietitian for nutrition information. FDPIR staff also attend monthly wellness meetings at Head Start to learn about a variety of health topics.

WIC and the Get Fresh program (SNAP/FSP nutrition education) are co-located with food distribution at one of the Chickasaw Nation FDP locations we visited. Chickasaw cooking demonstrations, funded by a SNAP-Ed/FSNE grant, target participants in WIC and SNAP/FSP as well as FDP clients. CHRs in the Choctaw jurisdiction assist homebound clients with food distribution program "shopping" and conduct outreach for FDP and other programs. The Choctaw Nation FDP refers clients to WIC, Head Start, Social Services, and the tribal Diabetes and Wellness Center.

VI. NUTRITION AND HEALTH

Study Question: Are there systematic differences in food security, nutrition, and nutrition-related health conditions (such as obesity and diabetes) between participants in FDPIR and participants in SNAP/FSP, or between American Indians who live where FDPIR is available and those who live where it is not?

Obesity, diabetes, heart disease, and other diet-related health conditions, increasingly prevalent among the general population, are particularly widespread among American Indians and Alaska Natives (Halpern 2007). Some tribes have responded by developing innovative diet and exercise programs, often drawing on tribally specific traditions and cultural values. It is also important to consider whether FDPIR and SNAP/FSP are helping tribes address these critical health conditions in Indian Country or making them worse.

FDPIR staff and participants told us that their program had better effects on health and nutrition than SNAP/FSP. In particular, there was concern about the availability of processed and "junk" foods through SNAP/FSP. Although our research methods cannot determine the accuracy of this view, we can identify aspects of the two programs that may affect nutrition.

One difference between the programs is in the nutritional quality of the individual foods they make available. SNAP/FSP can be used for any food to be consumed at home, including those FNS classifies as "foods of minimal nutritional value" in the context of the National School Lunch Program (soda, water ices, chewing gum, and candy) and others, such as potato chips and cookies, that are only slightly better nutritionally. Foods that meet nutritional needs may also be high in sodium, fat, or added sugar.

All of the foods in the FDPIR package, in contrast, address some nutritional need, and FNS has been working to find versions of these foods that are healthier, yet tasty enough that participants will select and consume them. In keeping with its continuing efforts to align all of its nutrition assistance programs with the 2005 Dietary Guidelines for Americans, FNS recently replaced butter, shortening, corn syrup, and luncheon meat with 1% low-fat ultra high temperature milk, beef roasts, fresh tomatoes, turkey ham, and canned chicken. FNS also offers nonfat refried beans, reduced sodium crackers and canned soups, quick oats, cheese made with skim milk, whole grain rotini, whole wheat flour, low-fat bakery mix, reduced sodium spaghetti sauce and canned vegetables, unsweetened canned fruit and juices, and instant nonfat dry milk.

The quality of FDPIR food has been improved by the Fresh Produce Program, in which most programs, including six of the seven that we visited, now participate. The Navajo Nation joined the Fresh Produce Program at the beginning of 2008. According to the Navajo-Hopi Observer (2008), however, as of November 2008, fresh fruit was only available at one of the seven warehouse pickup sites.

In some years (most recently, FY 2006), Congress has directed that a portion of FDPIR funding be used to purchase bison meat. Bison's low fat content, compared with beef, has made it popular even in places such as Oklahoma and California where it is not a traditional food.

Even foods that are reasonably healthy in themselves may be combined into an overall diet that is not well-balanced among food groups, falls short of Recommended Dietary Allowances (RDAs) for some nutrients, or exceeds recommended levels for others. The Thrifty Food Plan, the basis for setting SNAP/FSP maximum benefit levels, meets RDAs except for providing less potassium and vitamin E, and more sodium, than recommended for the reference household. SNAP/FSP, however, allows participants to choose any foods they want, within the constraints of a Thrifty Food Plan budget. Cole and Fox (2008) estimate that on the Healthy Eating Index—2005, where complete adherence to dietary recommendations would score 100, the average American scores 57.5, and the average SNAP/FSP participant scores 51.9.

The November 2008 FNS report to Congress on the nutritional quality of the FDPIR food package (Harper et al. 2008) found that the package met requirements for most RDAs, but fell short of the number of daily calories recommended for the reference household and did not provide adequate calcium, potassium, dietary fiber, vitamin A, or vitamin E. Magnesium levels were adequate when measured by averages for foods available from FDPIR (offered), but inadequate when measured by averages for foods that were actually supplied to the programs (delivered). Harper et al. (2008) report Healthy Food Index scores of 86.6 for the FDPIR package as offered, and 81.4 for the package as delivered.

FDPIR participants have less freedom to choose among foods than their SNAP/FSP counterparts. The FDPIR package sets monthly amounts in each of six food categories (grains, cereal, rice, and pasta; vegetables and soup; fruit and juice; milk and cheese; oil; and meat, poultry, fish, beans, eggs, and nuts). Participants can choose among the different foods within each group, but foods with little or no nutritional value, such as candy or soda, are not available from the program. FNS recently replaced butter, shortening, corn syrup, and luncheon meat with other items because these foods, though not on the official list of foods of minimal nutritional value, are high in calories and low in vitamins and minerals. In response to interest on the part of clients and program directors, FNS is considering the addition of a light buttery spread as a substitute for the butter. The buttery spread would have half the fat and calories of butter and no cholesterol.

It is theoretically possible, then, to come closer to recommended nutrient levels with SNAP/FSP, by following the Thrifty Food Plan, than by eating only FDPIR foods. But because SNAP/FSP participants have more freedom to make unhealthy choices than participants in FDPIR, the FDPIR participants may actually be eating better. Data on food intake or purchases for FDPIR participants and a comparison group of SNAP/FSP participants from the same reservations would be needed to know for sure.[23]

Both FDPIR and SNAP/FSP seek to influence participants' food choices by providing nutrition education along with their food or electronic benefits. The site summaries provide the

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[23] A study using an earlier version of the Healthy Eating Index found that diet quality for American Indians and Alaska Natives was comparable to that of other Americans (Basiotis et al. 1999).

details of these efforts. Initiatives supported by SNAP-Ed/FSNE funds do not necessarily include an active role for the local SNAP/FSP office; cooperative extension may be more directly involved. FDPIR administrators generally described the funding for nutrition education as inadequate. While FDPIR agencies cannot apply directly for SNAP-Ed/FSNE grants, which go to states, they can receive funding as part of their state's proposal for SNAP-Ed/FSNE funds. Two of the programs we visited had these funds: the Fond du Lac reservation, which used the money to fund a Nutrition Education Assistant at the tribal health clinic, and the Chickasaw Nation, which used the funds primarily to fund cooking demonstrations.

FNS has since established a new program of competitively awarded grants specifically for FDPIR Nutrition Education (see Table 2). Two of the programs we visited received awards in the first year (2008). The Crow Creek Sioux received $8,222 for efforts to encourage gardening, particularly with traditional foods. The Sherwood Valley Pomo program received $34,249 for initiatives to change behavior related to diet and physical (in)activity. FDPIR agencies in the Mountain Plains Region, including the South Dakota programs we visited, pool their nutrition education funds to support the Mountain Plains Nutrition Advisory Committee, which received an FDPIR Nutrition Education grant of $168,470 to develop materials that will be used by all the programs in the region, including a nutrition education video.[24]

FDPIR and SNAP/FSP can also affect health and nutrition by connecting their clients with other services. FDPIR agencies appear to do so more often than SNAP/FSP offices, particularly when the FDPIR enrollment or distribution site is located near tribal WIC programs and IHS or tribal clinics. The Chickasaw Nation Food Distribution Program is governed as part of the tribal health system, and one of the Sherwood Valley Pomo program's tailgate sites is Northern Valley Indian Health, Inc., which operates as a "one-stop service [center] for health care, food security, and housing assistance." At another program, which we did not visit, an IHS nurse comes to the FDPIR office (where enrollment occurs) twice a month to check blood pressures and blood sugars. The nurse frequently makes referrals for patients at risk for diabetes.

[24] Programs in the Midwest Region also pool their basic FDPIR nutrition education funds.

VII. CONCLUSIONS AND POLICY IMPLICATIONS

The central question for food assistance on and near reservations, now as in 1977, is whether a policy that offers a choice between SNAP/FSP and FDPIR, at both the tribal and household levels, is preferable to a policy based on SNAP/FSP alone.

FDPIR benefits some American Indian and Alaska Native households that are not eligible for SNAP/FSP. The TRIM3 simulation estimates suggest that in an average month, 13 percent of households eligible for FDPIR would not be eligible for SNAP/FSP. This matches the estimate by Usher et al. (1990). In most cases, SNAP/FSP ineligibility is due to that program's ABAWD rules or gross income limit, which have no parallel in FDPIR. Another 41 percent of the households eligible for FDPIR are eligible for SNAP/FSP but the retail value of their FDPIR commodities (estimated using FNS's methodology) exceeds the SNAP/FSP benefit for which they would be eligible.

Participating households also benefit from the ability to switch between programs. Households with fluctuating monthly income may be better off in SNAP/FSP in months of low earnings, and better off in FDPIR in months of higher earnings. Focus group participants also told us about patterns of switching to SNAP/FSP to load up on staples that are not in the FDPIR package, and about seasonal switching patterns on particular reservations.

The main argument for continuing commodity assistance in 1977 was that the residents of some reservations would have to travel great distances to county offices and grocery stores to obtain and use food stamps. While this argument is somewhat weaker today, it continues to be valid, and seems likely to be valid until reliable and economical transportation comes to Indian country. Participation in SNAP/FSP remains more difficult on reservations than in metropolitan areas: eligible persons often lack reliable transportation, public transportation is often nonexistent, and roads on many reservations are hazardous or impassable in winter.

On some reservations, access to grocery stores is better than it was 30 years ago. Economic conditions on many reservations have improved, making them more attractive markets for outside companies such as Wal-Mart and its competitors. Some tribes have built and operated their own supermarkets as part of their economic development programs. Physical access to county SNAP/FSP offices, meanwhile, has become less important as longer certification periods, wider availability of application forms, electronic benefits, and other changes in SNAP/FSP have reduced the need to make these trips.

Despite these positive changes, the site visits indicated that, were FDPIR to be eliminated today, barriers to accessing food would threaten the food security of large numbers of eligible families residing on Indian reservations. Many informants in different sites noted the difficulty of getting to SNAP/FSP offices and the difficulty of getting to grocery stores as primary reasons for selecting FDPIR. We found that access to stores with a wide selection and competitive prices was still limited on the reservations we visited in California, Minnesota, and South Dakota. Access to such stores was somewhat better in the two Oklahoma Tribal Jurisdictions we visited.

Participation in SNAP/FSP is increasing, while participation in FDPIR had been declining until recently. On some reservations, however, FDPIR participation has been increasing for several years, and national enrollment increased 4 percent in FY 2008. Study respondents confirmed that differences in eligibility and in expected benefits affect enrollment in the programs. Study respondents also suggested other reasons for participation in one program or the other. Improved access to supermarkets, increased preferences for convenience foods, and reduction of the stigma attached to receipt and use of SNAP/FSP benefits are all contributing to increased participation in that program. Both participants and administrators, however, suggested that it is easier to enroll and remain in FDPIR than in SNAP/FSP, and that elderly and disabled people like the home delivery that FDPIR may offer and SNAP/FSP does not.

Although the access argument for continued commodity distribution on reservations has become a bit weaker, other arguments can be made that would not have been valid, or would have had less force, in 1977. Increased obesity and diabetes among American Indians has increased tribal interest in health and nutrition, and FDPIR has become a healthier, more nutritious program. Participants in our focus groups were generally very positive about the commodities they received. Fresh fruits and vegetables have become available to FDPIR under the Fresh Produce Program, in which most tribes participate. SNAP/FSP leaves decisions about food choices to the participants.

FDPIR also addresses the health needs of American Indians and Alaska Natives through its nutrition education efforts, funded by FDPIR as well as through SNAP-Ed/FSNE grants to tribes. Focus group participants told us what they had learned about nutritional food preparation. State and county offices also provide SNAP-Ed/FSNE but those efforts appear to draw less on traditional foods and other aspects of tribal culture.

FDPIR sees participants monthly, when they pick up their packages. These monthly visits provide regular opportunities for staff to demonstrate healthy food preparation, recruit for other nutrition education activities, and reinforce nutrition messages with posters, handouts, cookbooks, and DVDs. At the sites we visited, all of this is done in culturally compatible and appropriate ways. The study suggests that while the FDPIR agencies are taking advantage of such opportunities, there is a need for more innovative initiatives to improve nutrition education and for actual changes in food preparation and consumption of healthy foods by participants.

Direct contact between SNAP/FSP staff and their clients is less frequent than with FDPIR due to a variety of factors, including certification periods that are longer than in the past, reduced reporting requirements, and other changes that have reduced the number of times each year that a participant must visit the county program office. Access to these offices is difficult for many reservation residents, and some American Indians and Alaska Natives perceive them as lacking cultural compatibility.

FDPIR offers several food delivery options, including warehouse pick-up, grocery store style facilities, tailgates, and home delivery, depending upon the tribe. This allows tribes to accommodate those in remote areas as well as elders and those with disabilities. SNAP/FSP participants must make their own arrangements for purchasing and transporting food. However, while some tribes have been able to improve facilities and service delivery options for FDPIR participants, some FDPIR programs indicate that they have limited equipment to handle fresh

produce or frozen meats and cannot renovate facilities due to a lack sufficient infrastructure funding. Our interviews with program officials were conducted prior to the American Recovery and Reinvestment Act of 2009 (ARRA) , which provides $5 million for FDPIR equipment purchases and facility improvements in FY 2009 and 2010.

FDPIR also contributes to Indian health through its connections to tribal health programs or IHS. FDPIR offices and warehouses are often located near IHS or tribal clinics, and some programs use the clinics as tailgate sites. This proximity means that FDPIR participants can combine food pickup with clinic appointments, reducing the number of trips, and makes it easier for FDPIR to draw on health staff such as the IHS dietitian the Crow Creek program consults on nutritional questions. SNAP/FSP appears to have fewer ties to the Indian health system, but better integration with Temporary Assistance for Needy Families (TANF), which is often administered from the same county office as SNAP/FSP.

Most FDPIR agencies are administered by tribes or intertribal organizations. The conditions for tribal administration of SNAP/FSP are more stringent, and in fact have never been met. The operation of programs by the tribes is consistent with Indian self-determination and self-governance, a cornerstone of federal-tribal relations. Where tribes administer related programs, tribal administration of FDPIR may also contribute to policy coordination in accordance with the tribe's strategic plan. An increasing number of tribes operate their own health facilities rather than rely on IHS. We saw some excellent examples of coordination in cases where FDPIR programs were located under the same administration as tribal health and nutrition services or services for the elderly. The number of tribal WIC programs has increased greatly since 1977, and enrollment in them has risen with the overall growth in WIC (FRAC 2000). Tribal TANF is wholly a product of PRWORA, enacted in 1996.

In conclusion, FDPIR and its management on reservations are far different than in 1977. Improvements in the products provided, tribes' increased awareness about health and nutrition, and the principles of tribal self-determination and self-governance all suggest that FDPIR continues to be a desirable alternative to SNAP/FSP for those living on or near reservations.

Figure 1. FDPIR and Indian Reservations, by State, FY 2009

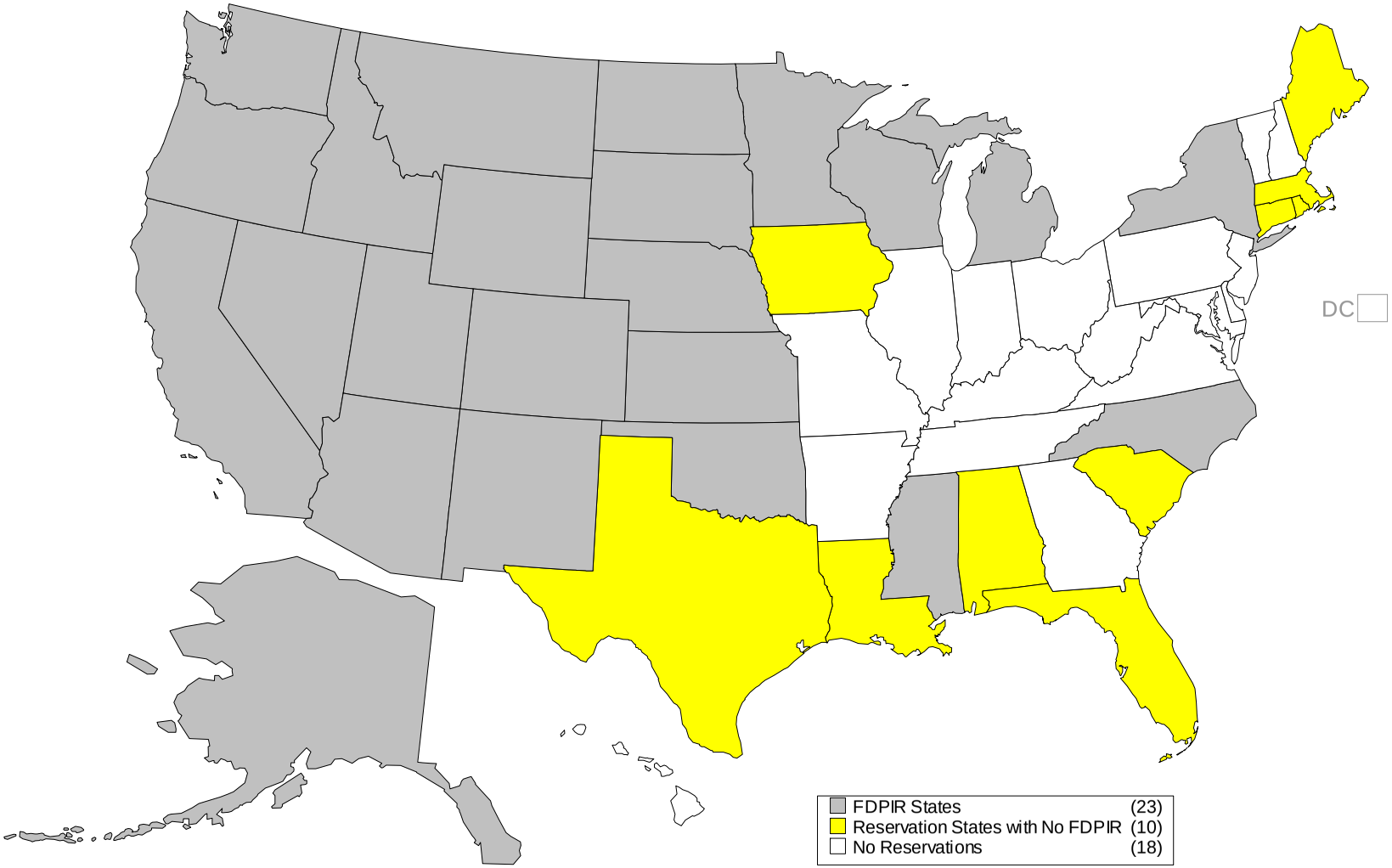
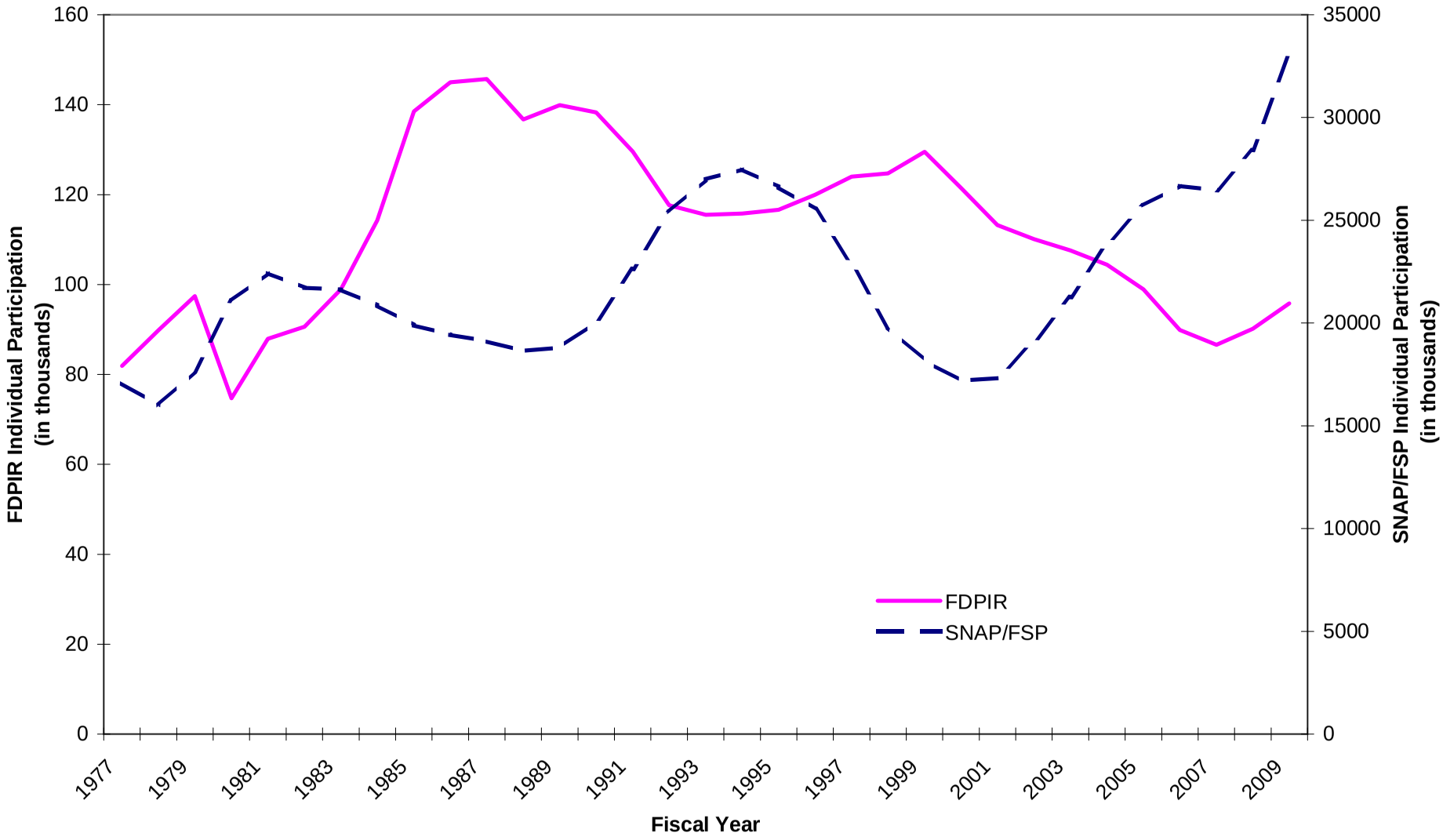


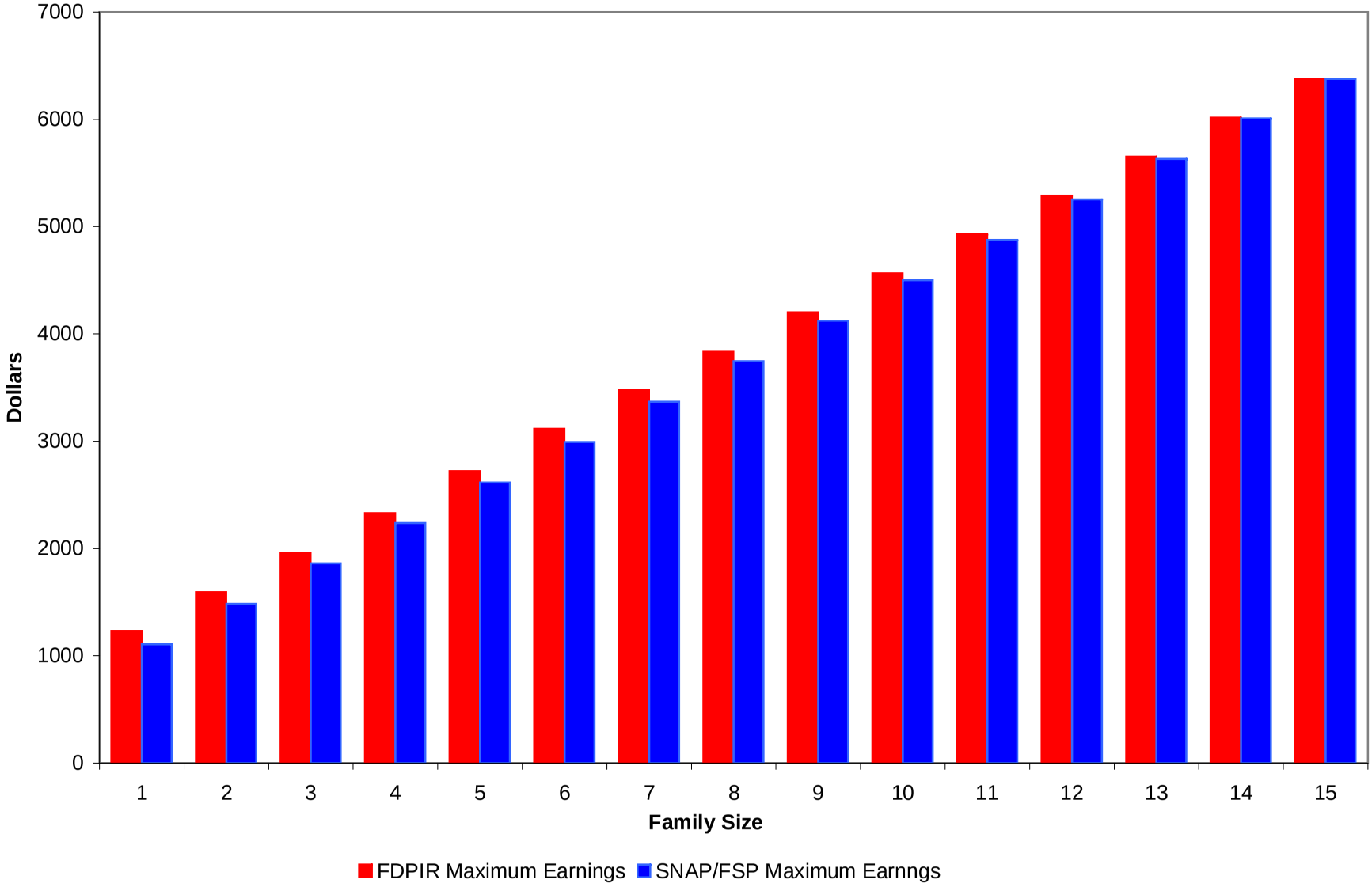
Figure 2. FDPIR and SNAP/FSP Enrollment, FY 1977-2009



Source: Food and Nutrition Service.

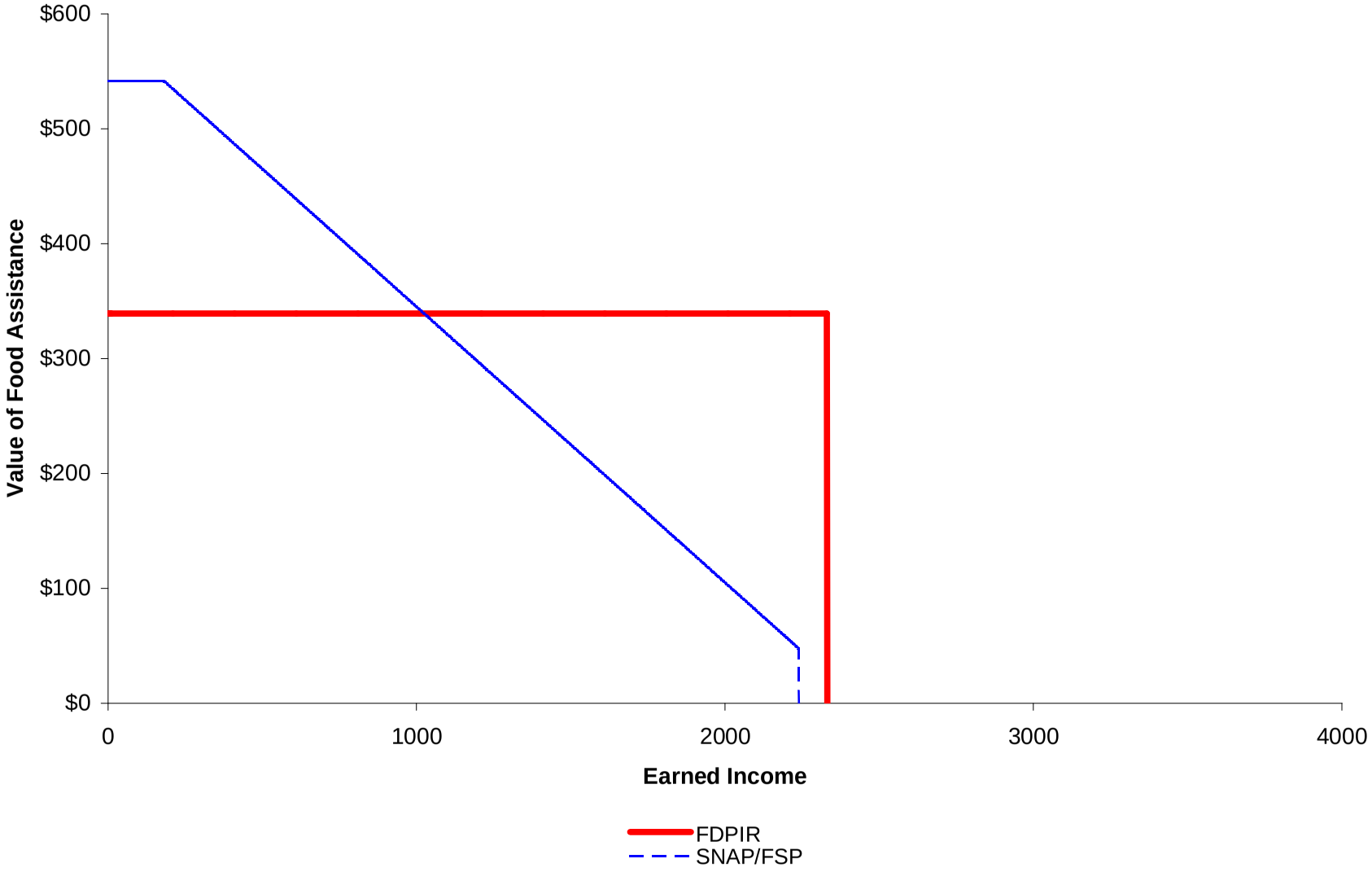
Note: FY 2009 data for October 2008 through July 2009 only.

Figure 3. Maximum Earnings, FDPIR and SNAP/FSP, by Family Size



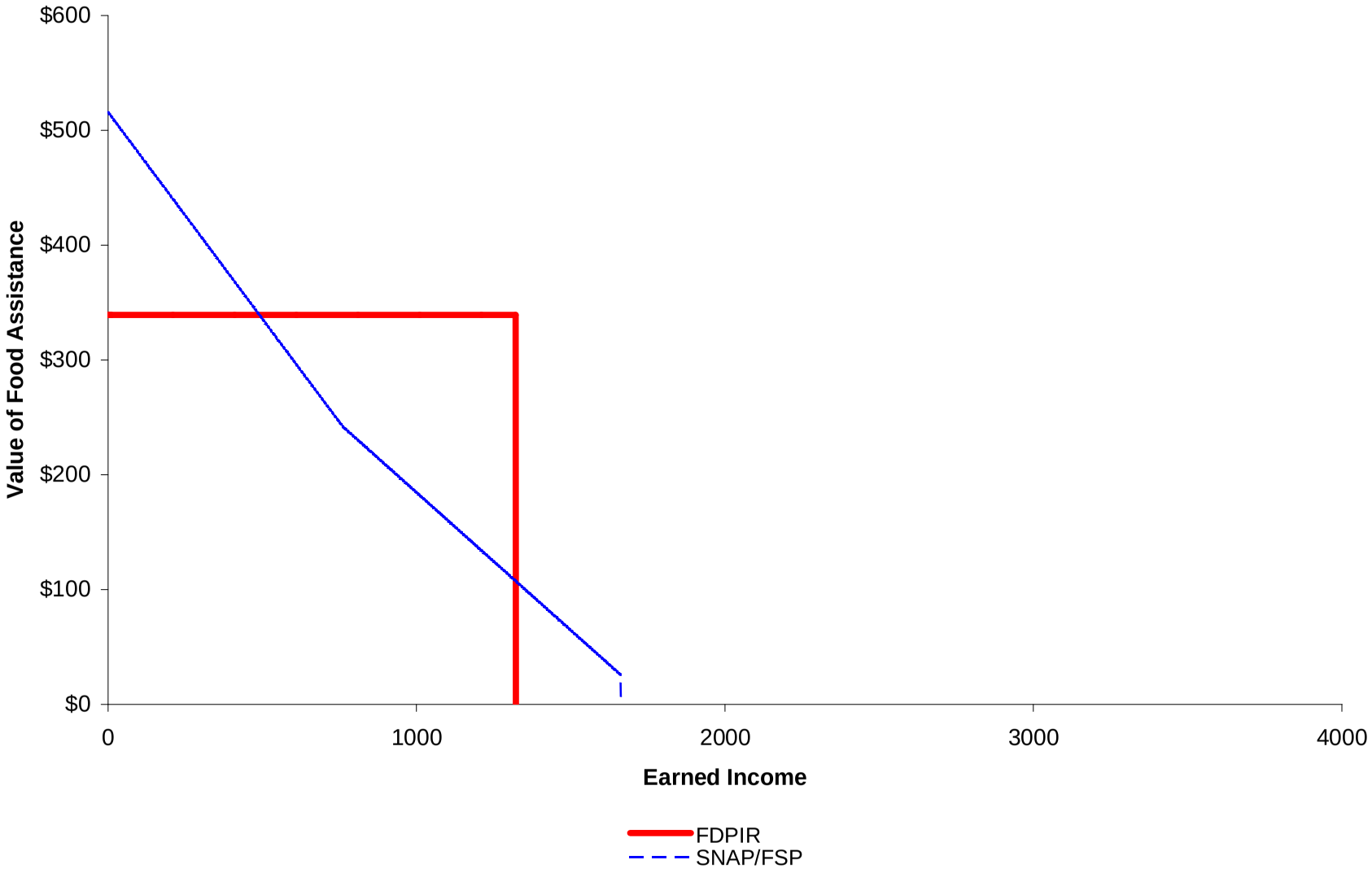
Note: based on FY 2008 rules; assumes no unearned income and no deductions for dependent care, child support, medical expenses, or excess shelter costs.

Figure 4. FDPIR and SNAP/FSP Eligibility and Benefits for a Family with Children



Note: based on FY 2008 rules; assumes a family of four with no unearned income and no deductions for dependent care, child support, medical expenses, or excess shelter costs.

Figure 5. FDPIR and SNAP/FSP Eligibility and Benefits for a Family with Seniors



Note: based on FY 2008 rules; assumes a family of four with two people age 60 or more, $1,000 in unearned income, $500 in medical expenses, $500 in rent, and no deductions for dependent care or child support.

Figure 6. FDPIR and SNAP/FSP Benefits, by Size of Unit, FY 2006

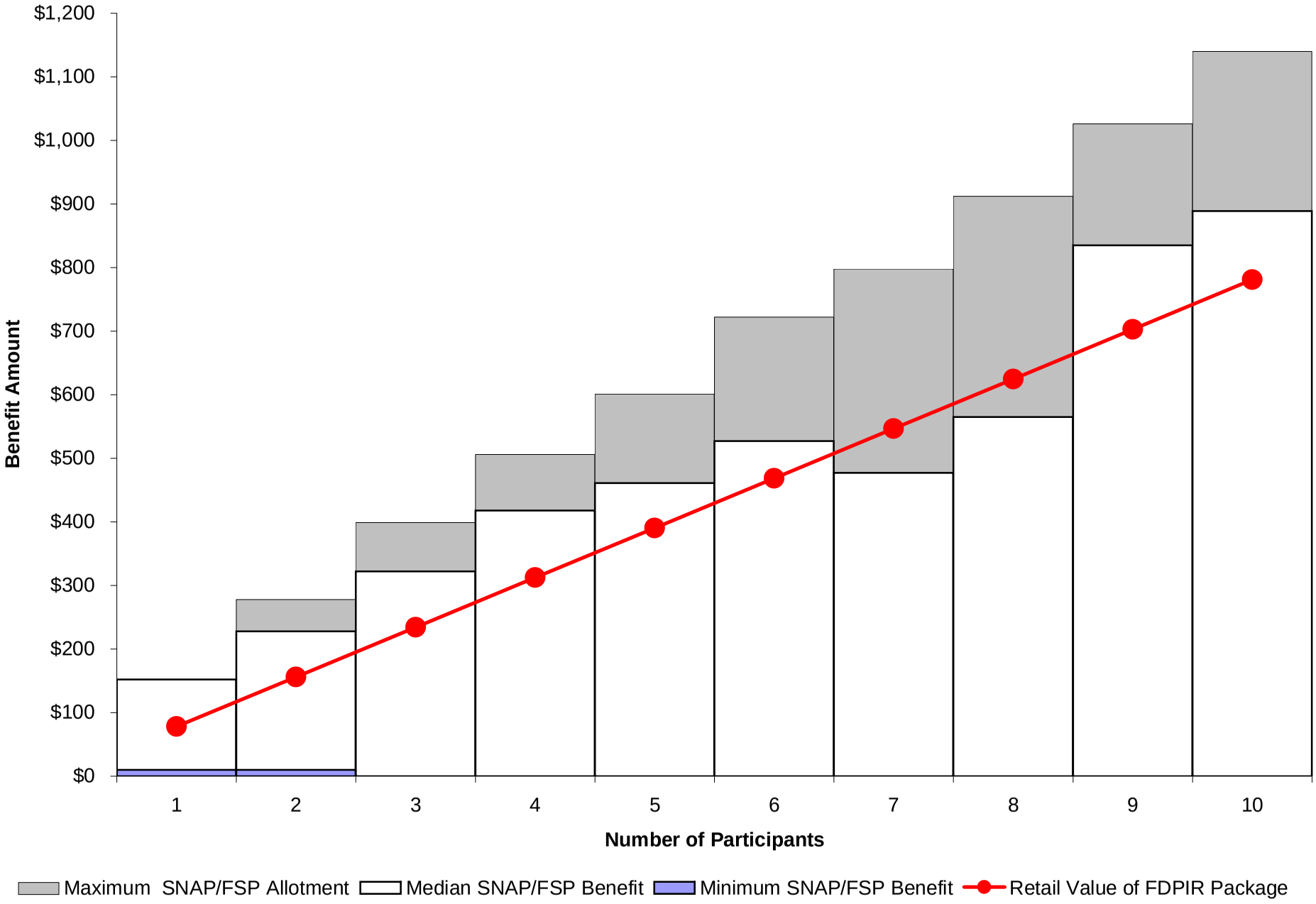


Table 1. FDPIR Foods Available, FY 2009

VEGETABLES
Beans, Green
Beans, Kidney*
Beans, Refried, Low Fat
Beans, Vegetarian*
Carrots
Corn, Cream
Corn, Whole Kernel
Peas
Potatoes, Dehydrated
Potatoes, Sliced
Pumpkin
Spaghetti Sauce*
Spinach
Sweet Potatoes
Tomato Sauce*
Tomato Soup*
Tomatoes, Diced
Vegetable Soup*
Vegetables, Mixed

OIL
Vegetable Oil

DRY BEANS
Great Northern
Lima
Pinto

MISCELLANEOUS
All Purpose Egg Mix

FRUITS
Apricots
Applesauce
Mixed Fruit
Peaches Cling
Pears
Plums Dried
Raisins

JUICE
Apple Juice
Grape Juice
Grapefruit Juice
Orange Juice
Tomato Juice

MEAT AND FISH
Beef Fine Ground, Frozen
Beef Round Roast, Frozen
Beef Stew Chunky, Canned
Beef, Canned
Chicken Cut Up, Frozen
Chicken, Canned
Tuna, Canned
Turkey Ham Frozen

SPECIALTY ITEMS
(Subject to Available Funds)
Ham, Frozen

GRAINS AND NUTS
Bakery Mix, Low fat
Corn Meal
Crackers, Unsalted
Egg Noodles
Farina
Flour, All Purpose
Flour, Whole Wheat
Macaroni
Macaroni and Cheese
Oats
Peanut Butter
Peanuts, Roasted
Rice
Rotini, Whole Grain
Spaghetti

CEREAL
Corn and Rice
Corn Flakes
Corn Squares
Crisp Rice
Oats
Wheat Bran Flakes

DAIRY
1% UHT Milk
Evaporated Milk
Instant Nonfat Dry Milk
Processed Cheese Blend

* Low or reduced sodium.

Source: Food and Nutrition Service.

Table 1. FDPIR Foods Available, FY 2009 (cont.)

FRESH VEGETABLES
(In Season)
Cabbage
Carrots
Carrots, Baby
Celery
Corn
Cucumbers
Green Peppers
Mixed Vegetables
Onions, Red
Onions, Yellow
Potatoes, Red
Potatoes, Russet
Squash, Summer
Squash, Winter
Sweet Potatoes
Tomatoes
Turnips

FRESH FRUIT
(In Season)
Applies
Grapefruit
Mixed Fruit
Oranges
Peaches
Pears

Table 2. FDPIR Special Nutrition Education Funding Awards

Indian Tribal Organization/State Agency	State	FY 2008	FY 2009*
Midwest			
Leech Lake Band of Ojibwe	MN	$40,488	$53,494
Menominee Indian Tribe	WI	$16,000	$27,196
Lac Du Flambeau Band of Lake Superior Chippewa	WI	$7,000	
Red Cliff Band of Lake Superior Chippewa	WI	$11,250	
Midwest Region Nutrition Advisory Committee	WI	$44,600	$78,753
Mountain Plains Region			
Prairie Band Potawatomi Nation	KS	$45,694	$28,770
Chippewa Cree Tribe (Rocky Boy)	MT		$72,902
Gros Ventre and Assiniboine Tribes (Ft. Belknap)	MT	$236,896	
Confederated Salish and Kootenai Tribes of the Flathead Nation	MT	$139,815	$136,795
Crow Creek Sioux Tribe	SD	$8,222	
Cheyenne River Sioux Tribe	SD	$6,429	
Mountain Plains Nutrition Advisory Committee	SD	$178,470	$123,389
Southwest Region			
Seminole Nation	OK	$2,500	$16,712
Sac and Fox Nation	OK	$7,500	
Inter-Tribal Council, Inc.	OK	$43,193	
Cheyenne and Arapaho Tribes	OK	$15,174	
Eight Northern Indian Pueblos Council	NM	$25,800	
Pueblo of Zuni	NM	$48,518	$52,618
Pueblo of Acoma	NM		$5,162
Western Region			
Alaska Native Tribal Health Consortium	AK		$131,993
Sherwood Valley Band of Pomo Indians	CA	$34,249	$59,578
Nevada Department of Administration	NV		$38,040
Lummi Indian Business Council	WA		$50,228
South Puget Intertribal Planning Agency	WA		$40,509
Yakama Nation	WA	$18,945	
Small Tribes of Western Washington	WA	$54,517	
Southeast Region			
Mississippi Band of Choctaw Indians	MS	$7,740	
Total		**$993,000**	**$916,139**

* FY 2009 data as of June 3, 2009.

Source: Food and Nutrition Service.

Table 3. Program Comparison

Category	Supplemental Nutrition Assistance Program (SNAP)	Food Distribution Program on Indian Reservations (FDPIR)
Geographic Coverage	Available throughout U.S. and in Guam and the Virgin Islands	Available on or near reservations and in Oklahoma Tribal Jurisdictions (23 states) Not available in places with populations of 10,000 or more unless located on reservation or covered by an FNS waiver
Tribal Administration	No tribally administered programs Some tribes involved in local administration*	Most programs*
Benefits	Electronic, dollar-denominated benefits Cannot be used to buy alcoholic beverages, tobacco products, pet food, or hot food for immediate consumption Varies by household size and net income	Commodity package Varies by household size only

* Policies with significant state or tribal variation.

Table 4. Characteristics of Selected Research Sites

Tribe	State	Region	FDPIR Participation (2006)	Percentage Change in FDPIR Participation(2002-2006)	Fresh Produce Program	Gaming	Unemployment Rate (2000)	Recommended by FNS/NAFDPIR	Close to At Least 1 Other FDPIR Program
Lower Brule Sioux	**South Dakota**	**Mountain Plains**	**509**	**25**	●	●	**28**		●
Crow Creek Sioux	South Dakota	Mountain Plains	287	-7	●	●	22		●
Fond du Lac Band of Lake Superior Chippewa	**Minnesota**	**Midwest**	**410**	**28**	●	●	**9**		●
Mille Lacs Band of Ojibwe	Minnesota	Midwest	126	-9		●	10		●
Chickasaw Nation	**Oklahoma**	**Southwest**	**4,045**	**-10**	●	●	**6**	●	●
Choctaw Nation	Oklahoma	Southwest	3,897	-29	●	●	7		●
Sherwood Valley Band of Pomo Indians	**California**	**Western**	**2,560**	**-23**	●	●	**12**	●	

Note: Programs in bold are primary sites with secondary sites in close proximity. Scheduling focused on primary sites.

Table 5. Eligibility Comparison

Category	Supplemental Nutrition Assistance Program (SNAP)	Food Distribution Program on Indian Reservations (FDPIR)	Modeled in TRIM3?
Tribal Membership	Not required	Not required if live on Indian reservation Required for at least one member of household if live near reservation or in Oklahoma Tribal Jurisdictions	Yes
Categorical Eligibility	Household is eligible without regard to income or asset limits if everyone receives TANF, SSI, or General Assistance*	Same as SNAP/FSP*	Yes
Gross Income Limit	130 percent of federal poverty guidelines Not applied to households with elderly or disabled person	No limit	Yes
Net Income Limit	100 percent of federal poverty guidelines	100 percent of federal poverty guidelines, plus standard deduction	Yes
Per Capita Payments	Annualized	Counted in month received	No
Standard Deduction	$144-$197, depending on household size Adjusted for inflation Deducted from gross income in calculation of net income	Amount is same as SNAP/FSP Added to net income limit	Yes
Dependent Care Deduction	Unlimited if necessary for employment or training	Same as SNAP/FSP	Yes

* Policies with significant state or tribal variation.

Table 5. Eligibility Comparison (Cont.)

Category	Supplemental Nutrition Assistance Program (SNAP)	Food Distribution Program on Indian Reservations (FDPIR)	Modeled in TRIM3?
Child Support Deduction	Unlimited if legally required	Same as SNAP/FSP	Yes
Work Expense Deduction	20% of earnings	Same as SNAP/FSP	Yes
Medical Expenses Deduction	Elderly or disabled only Expenses above $35 per month	Medicare Part B and Part D only	Yes
Excess Shelter Deduction	Costs above 50% of net income, after other deductions are applied	No deduction	Yes
Asset Limits	$2,000 per household ($3,000 if anyone in the household is elderly or disabled) Adjusted for inflation Vehicle value above $4,650 counted against limit*	$1,750 per household ($3,000 if the household has two or more members and at least one is elderly or disabled) Pending regulations would revise limits to match SNAP/FSP provisions Liquid assets only	Yes
Drug Felony Disqualification	Lifetime ban*	No disqualification	No
Work Registration	Required if age 16-59 and not working or in secondary school	No requirement	No
Time Limits	Able-bodied adults without dependents (ABAWDs) limited to 3 months in 36-month period if not working (suspended until October 2010).*	No time limits	Yes

* Policies with significant state or tribal variation.

Table 6. Simulated Average Monthly Eligibility for FDPIR and SNAP/FSP, 2005

Universe 1: All households where at least one person meets the following criteria:

- In FDPIR state
- Not in identified non-FDPIR county or city
- Native-born citizen
- American Indian or Alaska Native (alone or in combination with other races)

Sample Size:					
unweighted	1,137	CPS households	unweighted	3,501	persons
weighted	995,594	TRIM3 households	weighted	2,900,040	persons

		Households Eligible for FDPIR				Persons Eligible for FDPIR		
		Yes	No	Total		Yes	No	Total
Eligible for SNAP/FSP	Yes	26.5%	0.9%	27.4%	Yes	24.8%	0.5%	25.2%
	No	3.8%	68.7%	72.6%	No	3.3%	71.5%	74.8%
	Total	30.4%	69.6%	100.0%	Total	28.0%	72.0%	100.0%

Universe 2: Same as Universe 1 except qualifying person is American Indian/Alaska Native alone

Sample Size:					
unweighted	627	CPS households	unweighted	2,040	persons
weighted	502,429	TRIM3 households	weighted	1,491,562	persons

		Households Eligible for FDPIR				Persons Eligible for FDPIR		
		Yes	No	Total		Yes	No	Total
Eligible for SNAP/FSP	Yes	30.6%	0.4%	31.0%	Yes	28.8%	0.4%	29.1%
	No	5.6%	63.4%	69.0%	No	4.7%	66.2%	70.9%
	Total	36.2%	63.8%	100.0%	Total	33.5%	66.5%	100.0%

Universe 3: Same as Universe 2 except qualifying person reports Indian Health Service coverage

Sample Size:					
unweighted	291	CPS households	unweighted	941	persons
weighted	167,066	TRIM3 households	weighted	477,032	persons

		Households Eligible for FDPIR				Persons Eligible for FDPIR		
		Yes	No	Total		Yes	No	Total
Eligible for SNAP/FSP	Yes	40.4%	0.5%	40.9%	Yes	39.6%	0.4%	39.9%
	No	3.5%	55.6%	59.1%	No	3.8%	56.3%	60.1%
	Total	44.0%	56.0%	100.0%	Total	43.3%	56.7%	100.0%

Source: TRIM3 baseline and alternative simulations of Food Stamp Program.

Information presented here is derived in part from the Transfer Income Model, Version 3 (TRIM3) and associated databases. TRIM3 requires users to input assumptions and/or interpretations about economic behavior and the rules governing federal programs. Therefore, the conclusions presented here are attributable only to the authors of this report.

Table 7. Simulated Average Monthly Benefit Comparison for FDPIR and SNAP/FSP, 2005

Universe 1: All members of units eligible for both programs where at least one person meets the following criteria:

- In FDPIR state
- Not In identified non-FDPIR county or city
- Native-born citizen
- American Indian or Alaska Native (alone or in combination with other races)

Sample Size:	unweighted	375	CPS households	unweighted	1,155 persons
	weighted	264,212	TRIM3 households	weighted	717,970 persons

Assumed Value of FDPIR Monthly Package (per Person)

	$76.33	$50.00	$102.66
SNAP/FSP >= FDPIR	52.7%	68.0%	35.8%
FDPIR > SNAP/FSP	47.3%	32.0%	64.2%
Total	100.0%	100.0%	100.0%

Universe 2: Same as Universe 1 except qualifying person is American Indian/Alaska Native alone

Sample Size:	unweighted	246	CPS households	unweighted	813 persons
	weighted	153,771	TRIM3 households	weighted	429,243 persons

Assumed Value of FDPIR Monthly Package (per Person)

	$76.33	$50.00	$102.66
SNAP/FSP >= FDPIR	53.3%	66.5%	35.3%
FDPIR > SNAP/FSP	46.7%	33.5%	64.7%
Total	100.0%	100.0%	100.0%

Universe 3: Same as Universe 2 except qualifying person reports Indian Health Service coverage

Sample Size:	unweighted	133	CPS households	unweighted	438 persons
	weighted	67,514	TRIM3 households	weighted	188,749 persons

Assumed Value of FDPIR Monthly Package (per Person)

	$76.33	$50.00	$102.66
SNAP/FSP >= FDPIR	57.5%	68.9%	35.4%
FDPIR > SNAP/FSP	42.5%	31.1%	64.6%
Total	100.0%	100.0%	100.0%

Source: TRIM3 baseline and alternative simulations of Food Stamp Program.

Information presented here is derived in part from the Transfer Income Model, Version 3 (TRIM3) and associated databases. TRIM3 requires users to input assumptions and/or interpretations about economic behavior and the rules governing federal programs. Therefore, the conclusions presented here are attributable only to the authors of this report.

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Appendix: Site Reports

Fond du Lac Reservation

Mille Lacs Reservation

Lower Brule Sioux Reservation

Crow Creek Reservation

Chickasaw Nation

Choctaw Nation

Sherwood Valley Rancheria

Midwest Region Site Report

Fond du Lac Reservation

Research Staff: Nancy Pindus, Walter Hillabrant, and Tess Tannehill

I. Introduction

Research staff spent two days (Tuesday, November 27, 2007 through Wednesday, November 28, 2007) on the Fond du Lac Reservation for the Midwest region FDPIR site visit. The Fond du Lac Reservation is located in Cloquet, Minnesota in Carlton and St. Louis Counties. While on the Reservation, we conducted three formal interviews, which included interviews with the FDPIR Director, the Acting Director of Elderly Nutrition, Energy Assistance, and Commodities, and the Nutrition Education Assistant. Additionally, we met with the two members of the commodity program staff, who provided a tour of the FDPIR warehouse; the Tribal WIC nurse, who arranged a brief tour of that program's facility; and, briefly, the Tribal Chairwoman. We also received a comprehensive tour of the Head Start and Early Head Start facilities. One of the two FDPIR warehouse staff has been with the program since its inception in 1980. The FDPIR Director at Fond du Lac started soon after, in 1982.

In addition to interviews with program staff, we conducted a focus group with six current and former FDPIR and food stamps recipients. The focus group consisted of four women and two men, ranging in age from under thirty to over sixty. The number of children under the age of 18 living in the participant's homes ranged from 0 to 3 and the household size (including the participant) ranged from 1 to 7. Three participants were currently enrolled in the FDPIR commodity program, one was enrolled in the food stamp program, and two had previously participated in FDPIR but were not receiving benefits from either program at the time of the focus group.

Figure A-1. Fond du Lac Tribal Headquarters

The site visit also included interviews with staff at the welfare offices in Carlton and St. Louis counties, which serve Fond du Lac Tribal members. We interviewed two supervisors at the Carlton County office in addition to the Carlton County WIC coordinator. At the St. Louis county office we interviewed two supervisors and three financial workers who work directly with clients.

II. Tribal and State Context

A. Tribal Background

The Fond du Lac Tribe (affiliated with the Minnesota Chippewa Tribes, a confederation of six bands, each with its own Reservation) is located in northern Minnesota. The Tribe operates over 40 programs and is governed by the Tribal Business Committee, the Tribe's legislative body. The food distribution program is just one of many human services programs on the Reservation and most of the buildings from which these programs operate are located within close proximity to each other. Most notably, the Tribal WIC, Head Start, Early Head Start, and food distribution programs work closely together and refer clients between programs for services. However, the Tribe has a very limited role in SNAP/FSP. The FDPIR staff call the Carlton County welfare office only to ensure that clients registering for FDPIR are not receiving SNAP/FSP benefits.

Figure A-2. Fond du Lac cultural center

B. Tribal Economy

According to the Census Bureau, the unemployment rate on the Fond du Lac Reservation was 8.8 percent in 2000. The Tribe operates two gaming facilities: the Black Bear Casino and Hotel and the Fond du Luth Casino. The band distributes the equivalent of $400 per month in *per capita* payments to tribal members from casino revenues. This money can be distributed either monthly or annually and is deposited in trusts for children under the age of 18. The band is the largest employer in Carlton County.

III. FDPIR

A. Program Information

1. Mission. FDPIR staff referred to the program requirements stipulated by USDA when asked about the program's mission. The program's purpose is to ensure the availability of food for clients and to provide recipes and educational materials as much as possible. According to USDA, the mission of the Food Distribution Division is to "strengthen the nutrition safety net to low-income families, emergency feeding programs, Indian Reservations, and the elderly."

2. Client Population, Program Size, and Service Areas. In 2006, the Fond du Lac FDPIR had 410 participants monthly. Unlike most FDPIR agencies nationally, however, participation in the Fond du Lac FDPIR increased by 28 percent between 2002 and 2006.

The FDPIR serves those living on the Reservation and tribal members living near the Reservation in Carlton and St. Louis Counties (except for Duluth, as the city is too large to qualify). Participating households range from single person households to households of four,

five, or more. Most participants are tribal members. The program does serve non-Indians living on the Reservation, generally in families with one or more tribal members.

In the warehouse a calendar displayed the number of clients who came to pick up commodities each day of the month. For example, on the day before our arrival (11/26/07), 10 participants picked up commodities. It was also noted that 413 total participants had picked up their commodities for November as of November 26, 2007. November 13 was the day of the month with the largest number of participants who picked up their commodities—64 participants picked up commodities that day. The numbers decreased later in the month, indicating that most pick up their commodities during the first half of the month.

3. Eligibility. Individuals interested in participating in the FDPIR must fill out an application. Either the FDPIR director or one of her staff interviews the applicant, verifies the individual's identity with an ID, and checks paystubs to verify monthly income. If the applicant lives off the Reservation, he/she also must show proof of tribal enrollment. The applicant must also sign a permission form to allow FDPIR staff to call the County welfare office to check whether they are receiving SNAP/FSP benefits. The FDPIR staff call the County office and, if the prospective FDPIR client is not enrolled in SNAP/FSP, and the individual provides proper documentation, the individual is enrolled in FDPIR and entered into the FDPIR information system.

If the participant is on a fixed income, eligibility for FDPIR is certified on an annual basis. Otherwise, participants are certified for six months, and staff ask monthly whether anything has changed with the participant's financial situation when he/she picks up and/or places their food orders each month. The FDPIR application is two pages plus an additional page that lists the eligibility rules and instructions, which note that an individual cannot participate in SNAP/FSP and FDPIR at the same time.

Figure A-3. Fond du Lac FDPIR warehouse

B. Program Operations and Services

1. Outreach and Access. FDPIR staff tell participants when they come in about new food items that are available. For example, they generally get hams in December. They also put articles in the tribal newspaper to inform Reservation residents of the program. Applications for FDPIR are available at all other tribal programs and the basic eligibility guidelines for the program are on the Tribe's web page. The FDPIR does get a lot of inquiries and questions from these outreach activities. One respondent suggested that FDPIR applications be made available online, but another respondent

was not enthusiastic about this idea given that participants would still need to come into the office for interviews and to show their documentation.

2. Warehouse. The warehouse is large and is approximately five years old. This is the third building used since the program's inception. The warehouse has one large walk-in cooler and one large walk-in freezer, three small freezers for meat, and four large coolers for fresh fruits and vegetables.

Next to the warehouse, the building has a large kitchen with an oven/stove, refrigerator, microwave, and sink, which all look fairly new. The nutrition education assistant organizes cooking demonstrations using commodity and traditional foods in this kitchen. Additionally, tables are set up so that children of clients can color and/or sit while their parents place orders.

FDPIR staff place orders for commodities on the computer, which go directly to the Kansas City processing center. Once the orders are placed they can be modified for up to 5 working days before the scheduled delivery date. The delivery date is usually the first Monday of the month. As a smaller program, Fond du Lac FDPIR staff have to monitor when certain commodities become available. If something is not available when the initial order is submitted, staff will immediately get on the computer when they learn that it has become available in an effort to get a split shipment. The FDPIR director has been with the program a long time and has developed many information sources. Program staff must also monitor the amount of commodities they have in the warehouse as they are not allowed to have more than three months supply in stock.

To expedite customer service, foods are stored in the warehouse in the order that products are listed on the individual orders maintained in the FDPIR AIS ordering system. Name brand labels are being used more and more, which staff say makes the products look better. Shipments to the warehouse arrive on the first Monday of each month, and fresh produce is delivered once each week (on Mondays). Butter and shortening were recently taken out of the food package, which upset many participants. We were told that FNS decided to remove these products without any input from FDPIR tribal staff.

"My Pyramid" food diagrams were posted throughout the facility. Additional posters aimed towards maintaining a healthy lifestyle within the tribal community were posted throughout the warehouse and office. One poster read, "Traditional Foods: Keeping body, mind, and spirit in balance." Another poster read, "Diabetes can affect your feet…respect dance." There was also a "Maintaining Healthy Weight" poster hanging in the main entrance to the building that showed how to calculate BMI and a 2005 dietary guidelines poster. Additionally, Elder exercise programs are held at the tribal center with the nutrition education assistant who works with a variety of tribal programs on the Reservation. Diabetes and cancer are the health problems of most concern for tribal members

3. Distribution. Most participants pick up commodities at the warehouse once a month. Participants can pick up their orders anytime the program is open. The FDPIR building hours are 8:30 am to 11:30 am and 1:00 pm to 4 pm, Monday through Thursday (closed on Friday). Staff said that it is difficult to predict when clients will come in, although, typically, more participants come in early in the month. The warehouse is the only pick up location, but it is fairly convenient

given that it is located near most of the other tribal services and the commercial areas of Cloquet. The roads surrounding the warehouse are good, and participants are often in the area for other services as well. In addition to the warehouse, the program does provide home delivery to the elderly and disabled, which on average amounts to about 15-20 participants each month.

FDPIR staff walk through the ordering process with each client placing orders each month. In the office, some of the foods are displayed so that clients can see the types of cereal and other products to choose from when they are ordering. Clients order a month's worth of food and generally pick it up the same day they place their order. Staff and clients use the AIS ordering system provided by USDA and maintained by the Denver office. On the computer screen, foods are listed by group (e.g. fruits [indicating fresh or canned], meats [indicating frozen or canned], juice, etc.). For each item, the amount the participant may receive and the amount in stock at the warehouse are listed. The system tracks items that clients received with prior orders; some items can only be received once in two months. If an item is out of stock, clients are encouraged to select from available items, but a client can return for an "adjustment" pick up a second time in the month. The client's order is printed out at the computer and given to the warehouse staff to fill.

Home delivery is provided for the elderly and disabled. Home delivery clients can call in their orders. The warehouse manager, who has been with the program since inception, makes the deliveries. For the elderly, receiving a home commodity delivery is like getting a visit from a friend. FDPIR staff will help to put foods away in cabinets when making deliveries. We were told that staff drive on average about 10 miles for home deliveries.

4. Food Items. Occasionally, the FDPIR receives donations of food items beyond what they order through USDA. For example, the program received a donation of potatoes from the county and it received deliveries of fish from the Great Lakes Indian Fish and Wildlife Commission. When they receive these items, FDPIR staff prepare flyers and post them in the tribal government center and other locations as well as on the tribal website.

Program staff said that participants are very happy with the commercial labels on the food items, but there have been a lot of complaints about USDA cutting butter and shortening out of the commodity package. The program still receives vegetable oil, but one-person households can only order it every other month. Program staff said there is a sense that there was no chance for input from Tribes on the decision to cut out butter and shortening. USDA has said they will add two new food items to make up for the change, but it takes a while to add new foods, and this has not yet happened. There were complaints from clients about butter being taken out, and there are also complaints from clients about the quality of the soups.

Clients and program directors are encouraged to submit complaints to the FDPIR Commodity Complaint Hotline so that problems can be resolved and improvements can be made to USDA foods. Complaints can be submitted in writing, by telephone, fax, or email. Since our visit, FNS has added five items to the food package: 1% ultra high temperature (UHT) fluid milk; frozen beef roasts, fresh tomatoes, fully cooked frozen turkey ham; and canned chicken.

Focus group participants varied slightly in regard to whether the benefits that they received from these programs composed their sole source of food or if they purchased additional

food to supplement what they are given through these programs. One participant said that he relied on commodities from FDPIR for nearly all of his food, though he does purchase some extra to supplement what he's given. However, another participant reported that the only source of food for her and her family each month are the commodities that she receives through FDPIR. Participants said that making goulashes and stews help make the food last through the month. They also said that there is a local food shelf at Volunteers of America that they can use if necessary. Participants said that over time they have learned how to budget and make the commodities last throughout the month.

The *non-perishable food items* that are offered through FDPIR include: canned green beans; spinach; pears; mixed fruit; juices; kidney beans; luncheon meat; and vegetarian baked beans; potato flakes (recently resumed and popular among participants); raisins; prunes; all purpose egg mix (has a food pyramid diagram on the back along with a list of ingredients); egg noodles; vegetable oil; macaroni and cheese (popular); white rice; spaghetti; oatmeal; cold cereals (all name brand); crackers; and low-fat bakery mix. Since our visit, the luncheon meat has been removed from the package and replaced by the frozen beef roasts, frozen turkey ham, and canned chicken mentioned above.

The *fresh foods and produce* that are offered through FDPIR include onions, potatoes, carrots, celery, oranges, and apples. Russ Davis (where Super One, the local grocery chain, gets their produce) is the provider of fresh produce for the program. Fresh produce is delivered to the warehouse each week. Fresh produce can be substituted with canned depending on client preference. By FNS guide rates, one can of vegetable or fruit can be substituted for one pound of fresh produce. For products that are not sold in one-pound bags, FNS has provided general guidance on exchange ratios. Items that the program considers equivalent to one can of vegetables or fruit are: two yellow onions; two potatoes; seven carrots; three green peppers; three peaches; and two pieces of corn on the cob. Some of the fresh items, such as peaches and corn on the cob, are only available seasonally.

The amount of food that a family receives through FDPIR depends on the size of the family. While receiving the warehouse tour we saw FDPIR staff fill an order for a family of five, which included the following (this is not an exhaustive list):

- 4 chickens (frozen);
- 17 pounds of hamburger (frozen);
- Cans of tuna;
- Apples, oranges, and canned tomatoes;
- Cereal; and
- Evaporated milk.

FDPIR staff reported that the program serves families ranging in size from 1 to 10,

Nutritional Issues (and how they are addressed) and Native Foods

There are several nutrition and health-related activities occurring on the Reservation which report serving many FDPIR participants. FDPIR staff said that they were told that the Program would be receiving more nutrition education money from the USDA in 2008 and would

therefore like more of the Tribe's nutrition education assistant's time to plan how to use these additional funds most effectively. The FDPIR participants particularly like handouts and recipes, which FDPIR staff make available in the Program office. There are also posters and kids' activities focused on nutrition related themes. According to FNS, Fond du Lac did not submit a proposal to receive a portion of the special $1 million appropriation for FDPIR Nutrition Education in FY 2008 or FY 2009.

The FDPIR educates participants on healthy eating practices. Site visit informants said that the Program began focusing on nutrition education about five years ago. The Program holds cooking demonstrations; distributes handouts and flyers on healthy eating when cooking with commodities, diabetes prevention, and exercise; provides cookbooks with healthy recipes (participants really like these); and distributes flyers on how to keep things clean when cooking with meat. Participants said that one of the things that they learned through the program is to rinse potatoes and spaghetti to remove excess starch.

Focus group participants agreed that nutrition education provided through FDPIR has actually changed the behavior of those who receive commodities. One participant said that as a result of the nutrition education that he received, he no longer uses bacon grease on his oatmeal. He also learned how to prepare venison through a cooking demonstration. Another participant said that she feels that the Food Stamps Program meets the nutritional needs of her children, and though she does not receive nutrition education through the Food Stamps Program directly, her children learn about nutrition in school, where parents are also involved. She also noted that nutrition education is being discussed with the WIC program and through public health nurses (not just FDPIR), so she feels that the information is widely available and accessed by tribal members.

The FDPIR has not been very successful in getting and making native foods available to customers. FDPIR staff think that this is probably due to regional preferences which greatly vary across programs and to the seasonal availability of items. The tribe has at times supplemented the FDPIR food package with the traditional Ojibwe foods of wild rice and white fish, which FNS has never supplied. Every year tribal members harvest wild rice. One FDPIR participant began doing this with her husband last year. They collect rice on the water and store it in drums. To prepare the rice they boil it in a large kettle. Wild rice was not distributed the year we visited due to a drought. White fish is occasionally donated by the Great Lakes Indian Fish and Wildlife Commission. Participants also use seasonal berries (blueberries and raspberries) to make traditional jellies. Buffalo has been available some years but was not distributed at the time we visited.

IV. SNAP/FSP

The SNAP/FSP is called Food Support in Minnesota. The food support program is a federal program that is state supervised and county administered. The program is identical across all 87 Minnesota counties. In Minnesota TANF combines cash assistance and food support into what the state calls the Minnesota Family Investment Program (MFIP). We interviewed staff at both the Carlton County and St. Louis County Human Services offices. The Carlton County office serves the parts of the Fond du Lac Reservation that are in Carlton County. The St. Louis

County office serves the parts of the Fond du Lac, Bois Forte, and Vermillion Reservations that are in St. Louis County.

Carlton County. The Carleton County Human Services office has 2 offices with financial workers: the main office is located in Cloquet and the other in Moose Lake. Between these two offices there are a total of 15 financial workers, 3 in Moose Lake and 12 in Cloquet. The financial workers at the Moose Lake office take applications for all programs except child care. In Cloquet, the 12 financial workers are organized into 3 groups with 4 workers in each group. There are two supervisors at the Cloquet office whom we interviewed; 1 who works full time and the other part-time. The full-time supervisor works with two groups of financial workers in Cloquet in addition to 2 staff in Moose Lake and has been with the county for 23 years. One of the units she supervises in Cloquet takes applications for cash assistance, food support, child care assistance, and health care; the second unit she supervises in Cloquet takes applications from singles, except the elderly and disabled. The other supervisor oversees one unit in Cloquet and one staff person in Moose Lake. Her unit in Cloquet takes applications for food support and health care from the elderly and disabled in addition to applications for long term care assistance. We were informed that the combined application form (a 19 page booklet) is currently being revised to make it shorter, however, county human services staff suspect that this will not result in less work for the financial workers.

St. Louis County. There are four human services offices (Duluth, Virginia, Hibbing, and Ely) in St. Louis County, with Duluth being the largest. We interviewed two supervisors at the St. Louis County Human Services office, one who works in Duluth and the other in Virginia. The Duluth supervisor is one of 4 in her office and she oversees a staff of 19. The Duluth office has four units of financial workers who determine eligibility for all programs (TANF, SNAP/FSP, health assistance, state programs) except long-term care. Financial workers in the Duluth office each have an average caseload of about 200.

The Virginia office has two supervisors, one of whom we interviewed. The supervisor that we spoke with supervises 20 workers who handle cases of every type except long-term care. The other supervisor in the Virginia office has 10 workers who handle long-term care cases only. The Virginia office supervisor that we spoke with also supervises the Ely office, which services the Bois Forte (Band of Chippewa) Tribe. The Hibbing office has one supervisor and 13 staff.

1. Mission. No specific program missions were given at either of the two county human service offices.

2. Client Population, Program Size, and Service Areas. In the month of October 2007, the Carlton County office served a total of 193 families with at least one Native American household member. In October, Carlton County had 138 MFIP participants. Of these, 34 percent self identified as Native American. During this same month the county had 700 food support only cases, 18 percent of which were Native American. There were also 10 additional cases that were classified as "Native American and Other." Individuals can self-identify as Native American on the combined application form, information which is then entered onto the computer system (the form does not ask for tribal affiliation). In Carlton County, tribal participation is down in every assistance category except health care assistance; food support and cash assistance participation have decreased dramatically since welfare reform took effect.

In the Virginia, MN office, each financial worker has between 180 and 190 cases for cash assistance, food support, and medical assistance. The Virginia office is currently serving 6,048 active food support cases. In Ely, each worker handles about 170 cases and in Hibbing this number is between 185 and 190. In total, St. Louis County has about 16,000 cases.

In Duluth and in the northern part of St. Louis County, the food support population consists primarily of families and disabled adults due to the ABAWD requirements that limit food support participation among this population to 3 months in a 36-month period. In Duluth, many of the clients that they serve are working.

The TANF caseload has declined throughout the state including in St. Louis County. In Duluth, the food support caseload has remained relatively stable, as there have been no large economic changes recently. The food support caseload has stayed the same or increased slightly in Virginia in recent months as well.

3. Eligibility and Outreach. Any resident can call the Carlton County office and get an application in the mail or come in and pick up an application. The Carlton County office does not schedule appointments except for those who are institutionalized. If someone comes in during walk-in hours they are seen that day. Applicants for expedited or emergency services are taken any time during the day.

Financial workers conduct intake interviews and the two Carlton County supervisors do quality control, including random case reviews. They also check on timely notice and expedited insurance, among other things. The office support staff begin the process by entering basic client information into the information system and pend the application until the interview with the financial worker is complete. Certification can be for up to 12 months. Adults (not just Native Americans) go off and on food support, so there are lots of job changes and reapplications. If a client is working, he/she has to report income to the welfare office monthly, unless he/she resides on the Reservation. If an individual lives on the Reservation and has earned income, the participant is certified for 6 months because tribal members are not required to report income monthly. There is current state legislation pending for the food support program that would change to a 6-month budget for all participants, which would ease up time for financial workers.

Face-to-face interviews are required, except for those experiencing hardship, in which case these individuals can designate an authorized representative to appear on their behalf. The county offices have up to 30 days to process applications, however, applicants can be approved in as little as one day. Expedited reviews must be completed within 24 hours of the interview. The combined application form is not available online.

ABAWDs can only receive food support for 3 out of 36 months, however, there is no time limit for these individuals if the county has a waiver due to high unemployment rates. The Fond du Lac Reservation is currently exempted as a result of high unemployment.

The Carlton county office conducts outreach at the county fair and at the senior health fair. It has brochures in the waiting room at the office, in the public health building, at senior centers, and other locations. The brochures provide information on food support rules and refer people to the public heath and county WIC programs. In the past, a worker has gone to the clinic

on the Reservation to work with those applying for child care assistance and other certifications, but they stopped doing this because people would often not show up for their appointments. Currently, no one goes to other locations to take applications or conduct intake interviews. However, the Fond du Lac Reservation and other programs are close to the Carlton County office, which makes access across programs easier. Despite this, transportation remains a problem. The Reservation now has buses and the city of Cloquet has a Dial-a-Ride program that does go to the Reservation. Additionally, medical assistance pays for transportation to and from medical appointments.

The Carlton County public health clinic has three social service staff that help with food support applications and verifications. Both Carlton County Volunteer Services and office support staff at the County Human Services office help clients with applications as well. Individuals must obtain services from the offices that serve their county of residence. Because this means that clients cannot always go to the office that is closest to them, the state has explored the possibility of establishing a regionalized system, especially for health care services.

Elderly and disabled persons do not have to appear in person for recertification; this can be done over the phone. The Duluth office certifies those that are homeless for between 3 and 6 months and others for between 1 and 2 years, depending on the group. The Virginia office, however, serves a less transient population and therefore certifies individuals once each year in person, unless the in person interview is waived for good cause (for example, if the participant is elderly or disabled).

The state of Minnesota has radio ads in Duluth in addition to posters and information at state agencies throughout the State. The Economic Development agency has an outreach contract with the state. However, neither office was aware of any outreach efforts specifically aimed at those living on the Reservation. In fact, those that we spoke with in the Duluth office said that their specific office does nothing internally with respect to outreach. The office is open from 7:30 am to 11:30 am for walk-ins; staff take appointments and do processing in the afternoon; and they take expedited cases until 4:30 pm each day. They do not take applications outside of the office except for workers who go to two senior centers.

4. State or County Administered. The food support program is county- administered and state-supervised in Minnesota.

A. Nutritional issues (and how they are addressed) and Native Foods

Nutrition education materials are provided by the state and by USDA. The human services offices have pamphlets out on display in the intake areas. One office is trying to make this area more inviting by improving lighting. The county food support program does not work at all with nutrition education.

V. Program Coordination, Participation, and Cycling

A. Coordination Between FDPIR and SNAP/FSP

At intake, applicants to the FDPIR sign a permission form allowing FDPIR staff to call the County to ensure that they are not enrolled in the food support program. FDPIR staff

typically call the Carlton County office, as this is the county in which most Reservation residents live, and it has access to both Carlton and St. Louis County records. FDPIR staff also send a monthly list of FDPIR participants to the Carlton County Human Services office. It is the understanding of FDPIR staff that participants who participate in both programs in the same month are told to pay back the food support money they receive, but most understand that they cannot be on both programs at the same time, so this is rare. When we spoke with the county office they said that they received clarification from the state indicating that, with cases involving dual participation, they do not have to process overpayments, rather, they have to close the client out of one of the programs. The Carlton County office lets the Tribe and client know if they discover dual monthly participation. The client can then either choose to be on commodities or food support. In October of 2007 there were 3 dual participation cases, one of which involved a suspended food support case. Dual participation is handled differently at the St. Louis County office, where such cases are sent to the fraud unit and these families are disqualified from receiving food support benefits for 1 year.

When we asked administrators at the Carlton County Human Services office about the possibility of Fond du Lac administering their own TANF program, they saw no problem with this, but thought that it was unlikely given there are only 4 or 5 MFIP enrollees who are tribal members due to per capita payments and expanded employment due to gaming and economic development. They indicated that Fond du Lac is the largest employer in the county and that any tribal member who wants to work can get a job.[25]

FDPIR staff at the Fond du Lac Reservation also send a list of FDPIR participants to the Duluth office. Additionally, the Bois Forte Tribe sends the Virginia office a monthly listing of individuals on commodities as well. The front desk clerk gives the list to eligibility workers; respondents reported that dual participation is rare.

The food stamp application has a question asking whether the applicant currently receives or has ever received food assistance. If the answer is yes, the eligibility worker has to verify that it has ended. If the participant currently or formerly received benefits from the FDPIR, the worker will call Fond du Lac to verify that they are no longer participating.

One of the administrators at the Virginia office mentioned that cooperation with the Bois Forte Reservation has helped in getting individuals to come in and apply for MFIP and food support. We were told that in the past they had a good relationship with the Reservation, but then "it broke off," and over the last 10 years they have been working on building it up again. The Virginia office meets quarterly with the health care personnel from the Bois Forte Tribe.

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[25] Note, however, that we were told that the Fond du Lac Reservation is currently exempted from the limits on ABAWD participation as a result of high unemployment.

B. Coordination between FDPIR, SNAP/FSP, and Other Programs

The FDPIR lets participants know about the Salvation Army in Cloquet, which has emergency food boxes that feed families of 4 for 2-3 days. The Salvation Army serves everyone, but 75 percent of those they serve are Fond du Lac tribal members. The Tribe is currently looking for a space to set up an emergency food bank on the Reservation.

Early Head Start and Head Start. The FDPIR coordinates extensively with the tribal Head Start, Early Head Start, and WIC programs. In fact, the FDPIR director serves on the Head Start nutrition committee. Each January, FDPIR staff make a presentation at the Head Start facility to provide information about the program and demonstrate how much food a family would receive and what the package looks like. Parents occasionally inquire about the program early in the year when they are short on money after the holidays and have not yet received their federal tax refunds. The Child/Adult Care Food Program (CACFP) operates 5 days a week and provides meals to children enrolled in the Head Start program at no cost to enrollees. The program is moving away from processed foods. Multiple menus are used each season so that seasonal fruits and vegetables can be included as much as possible.

WIC. In Minnesota, all Head Start participants are automatically eligible for WIC, so the Head Start program encourages families to sign up for WIC, which is in the public health clinic next door. There is both a tribal WIC program, which is in the public health clinic, and the county WIC program, located in Cloquet next to the County Human Services office. Tribal members can choose to receive services from either WIC program. The tribal WIC program has FDPIR applications on-site. The tribal WIC program also has an office in Duluth; however, those participants would be on food support, not FDPIR, if they received food assistance beyond WIC. The tribal WIC program serves 190 households in Cloquet and 130 in Duluth. The WIC program provides individual nutrition education when people come in for their appointments or to pick up vouchers. They also have displays and informational programs in the office entry area. The nutrition education assistant that we spoke with rotates between programs on the Reservation including both FDPIR and WIC.

Figure A-4. Building housing WIC, Head Start and other programs

All of the WIC programs, including the tribal WIC program at Fond du Lac, are under the Minnesota Department of Public Health and are quite similar, as they all still use paper vouchers.

Native Americans can choose to participate in the tribal WIC program or the County WIC program, whichever they prefer. Of the 959 clients that the County WIC program served in October of 2007, 11 identified as Non-Hispanic American Indian; 2 as Non-Hispanic Asian; 4 as Non-Hispanic African American; 51 as Non-Hispanic multiple race; and 861 as Non-Hispanic white. One person identified as Hispanic and American Indian; 10 identified as Hispanic and multiple races; and 19 identified as Hispanic and white.

WIC clients receive nutrition education every 3 months when they pick up their vouchers. Higher risk clients, however, may be required to come in more often for nutrition education. All nutrition education is one-on-one, and focuses on long-term food choices and exercise. Grocery shopping is discussed in the context of buying fresh fruits and vegetables.

We were told that county WIC staff do not work much with the Fond du Lac Reservation directly, but know the tribal WIC staff and they are on friendly terms. There is some switching between the county and tribal WIC programs. Sometimes Native Americans choose the county WIC program over the tribal WIC Program because they feel that at the tribal program everyone knows about their private business. County WIC staff also refer people to food pantries and food support, but not FDPIR, but only because in the past they had not thought about doing so.

Nutrition Education Assistant. The Nutrition Education Assistant works as a nutrition educator at the tribal health clinic on the Reservation and with several programs, including FDPIR. Funding for her position comes from Food Stamp Nutrition Education money. She has had both FDPIR and SNAP/FSP participants in her nutrition education activities. Most of her classes are at the tribal health clinic, but she also goes directly to the WIC and FDPIR offices occasionally. She teaches nutrition, how to grocery shop, and food handling. She has taken people grocery shopping to show them how to shop and what to buy. Portion control is another topic that she covers regularly in her monthly classes. In her cooking demonstrations and recipes she tries to make foods that are cheaper and healthier than the standard recipes. For example, she uses raw or dried rather than canned beans, adds wild rice to recipes, and uses real, not canned, sweet potatoes. She incorporates traditional foods in her nutrition program. For example, in November in the FDPIR kitchen, to coincide with hunting season, she cooked venison and wild rice. She brings in speakers to show how to cut, smoke, and preserve venison. She does a similar fish lesson in the spring to coincide with fishing season. She also has nutrition programs for Head Start family nights. At the clinic there are also dietitians who work with diabetes counseling and the Weight Watchers program.

The Tribe has added additional places for people to exercise. There is now a weight room at the drop-in center and a weight room and Olympic size indoor pool at the main tribal center. The nutrition education assistant teaches water aerobics for the elderly there. The tribal centers in the other 2 districts on the Reservation also have exercise facilities. “On the Move” is a diabetes prevention program on the Reservation. Participants receive points for exercising and earn prizes. There are many exercise and health education activities on the Reservation that can be used to earn points. This program is just one that is advertised in the FDPIR office. The Tribe also has a monthly newspaper, which in December had a full page article on diabetes education written by one of the Tribe’s physicians. There was another half-page article in the newspaper on how to make holiday meals healthier.

C. Factors Affecting Program Participation and Cycling

Per capita payments from casino revenues amount to $400 per month per person. Tribal members can receive this monthly or get the total payment once each year; for children the sum is deposited into a trust account until they turn 18. The elderly who initially elected to receive per capita payments monthly were often disqualified from FDPIR because when added to social security, they exceeded the income guidelines for a household of one or two. However, by electing to receive a one time payment each year, participants can avoid being over the FDPIR income guidelines every month.

As of late, FDPIR staff indicated that there has not been much switching between FDPIR and food support. In terms of variation, the FDPIR caseload does not generally fluctuate in either direction more than 20 families each month. However, FDPIR does have more participants in the winter because more people are out of work during this time. We heard from administrators at the human services offices that often people choose between FDPIR and food support depending on the benefits that they are eligible for that month. If one's food support benefit decreases in a month due to an increase in income, commodities become a better option. Overall, switching between FDPIR and SNAP/FSP seemed to be more common in the Duluth office compared with anywhere else, but even there it is not a frequent occurrence.

FDPIR. FDPIR requires less paperwork than the food support program, which is one reason that it is preferred among some. We were also told that there is no stigma associated with receiving commodities on the Reservation (especially with commercial labels), as commodities are a part of reservation life. With commodities, you are receiving help within your community, but with food support one must go off the Reservation. Others choose to participate in FDPIR because they can get much more food than they could buy through food support. Additionally, with the commodity program participants do not have to provide as much personal information and they can avoid speaking with county food assistance staff. Focus group participants also said that they never have to wait to receive services at the FDPIR warehouse. We heard from one participant that because of her county of residence she would have to drive 30 miles every six months to be recertified for food stamps, which made FDPIR a better option for her family.

The elderly also tend to prefer FDPIR because they often only receive the $10 minimum in food support. Some elderly do not like learning to use EBT cards (as they have never had a credit card and do not know how to use the ATM), so they stick with commodities, however, staff noted that this is a generational problem that will probably change over time.

Food Support. One focus group participant said that she likes using food support because she has young kids and she can get more variety through this program. She likes the option of buying items such as fruit roll-ups, pop, and a variety of cereals that are available at the grocery store. However, she did acknowledge that with food support there is a lot more paperwork. You have to provide documentation on where all of your money is coming from. She said specifically, "It's almost like having a social worker… They want to know every breath you take." The convenience of being able to shop at a grocery store or gas station and have a wide selection of foods outweighs the costs of the food support program. She also said that she does not feel that there are stigmas attached to using EBT cards at the grocery store and she does not feel uncomfortable doing this.

VI. Overall Assessment and Suggestions by Respondents

Overall, this program is well-situated on a reservation where the Tribe has clearly invested resources in improving infrastructure and services. The buildings are modern, attractive, and in good condition. The Tribe has emphasized health and wellness through nutrition education, exercise programs and facilities, and health services, and the FDPIR is well coordinated with these initiatives. The FDPIR staff have all been with the program a long time, understand the program, and have good relationships with participants and with other service providers. There are some challenges associated with being a small program, including product ordering and availability as well as capacity to offer alternative food delivery options.

Fond du Lac FDPIR staff would like to be able to offer FDPIR to tribal members living in Duluth. The Tribe has other services in Duluth and there are needy Native Americans who live there that could benefit from the FDPIR.

FDPIR participants would like to see butter as a commodity again. Without this they are unable to use the baking mix that is provided through the program. Even though participants still have access to oil through the program, they noted that it is not the same as butter for baking. Additionally, participants would like to see the generic USDA wheat checks cereal return (which was available six or seven years ago), the monthly allotments of meat and fresh fruits and vegetables increase, sugar added as a commodity (to help in making homemade snacks and baked goods), and the "stew packet" remain in the commodity package. FDPIR also has offered packages of ground bison/buffalo periodically, and participants would like to see that product available more often. Participants also said that one of the best things about the program was the large blocks of cheese, and if at all possible would like to see the cheese allotments increase.[26] Lastly, participants do not like natural peanut butter that comes with oil on the top, and would rather have the peanut butter that USDA provided 5 years ago. It was also noted that that although participants like the fresh fruits and vegetables offered, they do like having the choice between both canned and fresh items.

Focus group participants all agreed that name brand labels on commodities do not matter. They acknowledged that the name brand labels are more attractive, but said that it is what is in the box or can that is far more important. FDPIR participants also said that if there are ever recalls on commodity meats, they need to be given dates to know which items to discard so that they do not have to get rid of everything.

Given the rising costs of gas, living expenses, and inflation, FDPIR participants and county administrators all agreed that the income limits for food support eligibility should increase. Additional comments made by program administrators were that the ten dollar minimum benefit for food support should be increased (as it was after our visit); food support

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[26] The guide rate for cheese is 2.5 pounds per person. The cheese is provided in five-pound blocks, so one-person households get a block every two months, two-person households get a block each month, and three- and four-person households receive two blocks a month.

benefits should not "age off" EBT cards after 90 days (this has already changed to a year in Minnesota); the combined application form should be simplified; outreach providers should be hired to assist participants complete applications and gather appropriate documentation; and increased access to transportation should be provided for the elderly.

In terms of simplifying the combined application form, one financial worker said that the government already collects the information asked for on the forms and therefore much of the information they have to gather from clients is unnecessary. Through IRS records most of the information could be gathered independent of the client, which would make the process seem much less invasive. This same financial worker suggested that offering drug testing and treatment would be helpful in terms of providing better services to clients.

Another suggestion to improve access to county human services offices is to allow individuals to apply for assistance at the offices that are closest to them rather than having them go to offices in their county of residence. We heard from county administrators, FDPIR staff, and participants that some travel thirty miles each way to access their county welfare office when another office is located in a different county, across the street. Providing more flexibility in this area would reduce the burden on clients in accessing services.

Additionally, we heard from food support administrators that some elderly are not comfortable using EBT cards and do not participate in the food support program because the program requires using them. Having an alternative to EBT cards for the elderly could increase participation not only in Minnesota, but nationwide. Administrators and participants also mentioned that fraud occasionally occurs with the food support program and EBT cards.

Midwest Region Site Report

Mille Lacs Reservation

Research Staff: Nancy Pindus, Walter Hillabrant, and Tess Tannehill

I. Introduction

Research staff spent one day (Thursday, November 28, 2007) on the Mille Lacs Reservation for the Midwest region FDPIR site visit. The Mille Lacs Reservation is located in Onamia, Minnesota and covers parts of Mille Lacs, Aitkin, Crow Wing, and Pine counties. While on the reservation we conducted one formal interview, which included speaking with the FDPIR warehouse supervisor, an assistant to the FDPIR Coordinator, and a part-time warehouse staff member. After returning to Washington, a phone interview was also conducted with a financial worker from the tribal TANF program.

In addition to those that we spoke with on the reservation, we also met with two staff at the Mille Lacs County Human Services office. We interviewed the Income Maintenance Supervisor and the Lead Worker for Food Support at this office.

II. Tribal and State Context

A. Tribal Background

The Mille Lacs Band is a part of the Minnesota Chippewa Tribes, a confederation of six bands, each with its own reservation in northern Minnesota. The food distribution program (FDPIR) at Mille Lacs is part of the Band's Department of Health and Human Services, within the executive branch of the tribal government, which is overseen by a commissioner. The band also operates its own tribal TANF program, which coordinates with the FDPIR program to ensure that participants are not participating in the Food Stamp Program and FDPIR in the same month.[27] However, because most tribal members are not eligible for Food Support due to per capita payment income, this is not a major problem on the reservation.

B. Tribal Economy

According to the Census Bureau, the unemployment rate on the Mille Lacs Reservation was 9.9 percent in 2000. The tribe operates two gaming facilities: the Grand Casino Hinckley and Grand Casino Mille Lacs. The band distributes the equivalent of $700 per month in per capita payments to tribal members from casino revenues. This money can be distributed monthly, every three months, or annually, and is deposited in trusts for children under the age of 18. The tribal government and gaming facilities are two of the largest employers on the reservation.

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[27] SNAP/FSP is known as Food Support in Minnesota.

III. FDPIR Program

Program Information

The FDPIR warehouse supervisor has been with the program for about 4 years and is responsible for receiving and reviewing applications, certifying participants, submitting monthly orders from participants, ordering commodities, meeting with clients, and distributing information. There is also a FDPIR Coordinator (with whom we were unable to meet), an assistant to the Coordinator (who also works with the elderly programs on the reservation), and a part-time warehouse assistant.

Organizationally, the FDPIR program is part of elder services, which includes Meals on Wheels, Public Health, and assisted living. The FDPIR staff works closely with the elderly programs. However, there is not much coordination between FDPIR and the tribal WIC program.

1. **Mission.** The FDPIR program mission is to provide food assistance to low-income households. Other than handing out informational flyers, the FDPIR program does not include much nutrition education activity.

2. **Client Population, Program Size, and Service Areas**. Most FDPIR clients are between the ages of 30 and 50 and participating households range in size from 1 to 10 persons. Program participation began declining in the last year because the tribe began distributing per capita payments from casino revenues to tribal members. Tribal members receive the equivalent of $700 each month from per capita payments, which has made many former participants ineligible for FDPIR benefits. Among those with regular work, receiving per capita payments three times annually seems to be preferred. However, among those who do not have regular work, many seem to prefer receiving per capita payments more frequently. These are the individuals that need assistance the most, yet are more likely to no longer qualify for FDPIR benefits if per capita payments are received on a monthly basis. Respondents indicated that many tribal members believe that per capita payments hurt more than help by disqualifying needy individuals from various social welfare benefits and discouraging work. Staff of all income eligible programs on the reservation, including FDPIR and TANF, did a lot of education of clients about the bonus payment options to help them understand the implications of their choice for program eligibility.

   The Mille Lacs FDPIR program serves all rural communities in a 6-county area, however, as stipulated by USDA, the program cannot serve communities with populations over 10,000. In the parts of the service area that are not on the reservation, at least one household member from each family receiving FDPIR benefits must be a member of a federally recognized tribe.

Grocery stores are accessible in Onamia and neighboring towns. Participants also use hunting and fishing to supplement their diets.

3. **Eligibility.** Elderly participants who are on fixed incomes are certified for one year, while those who are working are certified for a three month period. FDPIR participants with no income are certified on a monthly basis. Per capita payments for children go into trust accounts and do not count against households as income. Because casino profits have

increased in the last year, per capita payments will increase for the month of December and make more participants ineligible for the month. Each year tribal members can elect to receive per capita payments monthly, quarterly, or annually, a choice that can greatly affect FDPIR eligibility.

B. Program Operations and Services

1. Outreach and Access. The FDPIR program distributes literature at health fairs and contributes articles to the tribal newsletter. If the program cannot provide benefits to someone due to ineligibility, the program refers them to the local food shelf or to the tribal emergency food program.

2. Warehouse. The program uses the AIS system to compile individual orders and track inventory. Most programs use this as it is provided by USDA free of charge. Program staff do not have complaints about the system. The staff only order food from USDA on an as needed basis. Because this is a small program, restocking on a monthly basis is not typically necessary.

When ordering food from USDA, there are problems with availability. It is not uncommon for the supplier to be out of a commodity when an order is placed. Staff thought that as a smaller program they were disadvantaged when ordering commodities. The system used for food ordering, which is different from AIS, is cumbersome. The 5 USDA security pages and codes that have to be entered were cited as specific examples. Several years ago the program participated in a prime vendor pilot that worked like a grocery store. During the pilot the program was provided consistently with the same food items and was able to establish a relationship with the delivery driver. Staff perceived a reduction in the quality of the commodities when the pilot ended and the program switched back to the current system. Additionally, with the current system there is a new driver every month to whom the program has to give directions. The drivers are not permitted to help use the forklift to move commodities from the delivery truck to the warehouse.

In terms of infrastructure, the warehouse has 1 freezer, 1 regular sized refrigerator, and 1 cooler (there is also another cooler that is not currently being used). The program keeps frozen chicken and ground beef in the freezer, fish (donated by Great Lakes Indian Wildlife Commission) in the regular size refrigerator, and cheese in the large cooler. The program does have some problems with food expiration, spoilage, and insects with some of the powdered products (for example, flour, cornmeal, and oats). At the time we visited, the program was trying to replace a freezer that did not stay closed, but had not yet reached agreement with FNS on financial responsibility for the new equipment.

The part-time warehouse staff member takes paper orders and fills them in the warehouse. He also uses a forklift to get commodities off of the truck and unloaded into the warehouse. At this time, the commodities are counted and dated.

3. Distribution. The warehouse is the only distribution site on the reservation and participants pick up their orders once a month. Participants who cannot pick up commodities themselves can send someone to do this on their behalf as long as they inform the staff. The location of

the warehouse is fairly accessible. Participants can call in their orders prior to picking them up or just ask staff to fill the same order as the previous month in what they call "Autofill." Additionally, about once each month FDPIR staff take orders to local community centers where those who live further from the warehouse can pick-up their commodities.

4. Food Items. The commodities that the program receives have been about the same for the last couple of years. Participants do not seem to care too much about name brand versus generic labels, as they are simply happy to receive the food.

The Mille Lacs FDPIR program does not participate in the fresh fruits and vegetables program. The program staff applied for approval for this program from band leadership, but no decision has been made.

Participants have asked for coffee or tea to be added as commodities, but no requests for basic food items have been made. The staff expected to hear complaints from participants regarding the elimination of butter and shortening as commodities when participation increases again early in 2008. **Nutritional Issues (and how they are addressed) and Native Foods**

The program does not receive any native foods from the FDPIR and have had no requests for them from participants. The program does, however, receive fish and wild rice donations from the Great Lakes Indian Wildlife Commission, a portion of which are distributed to FDPIR participants. Wild rice is not grown at Mille Lacs.

IV. Food Stamp Program

A. Program Information

At the Mille Lacs County Human Services office, we interviewed the income maintenance supervisor, who oversees 13 employees who process applications and conduct client interviews for those applying for cash assistance, Food Support, and/or medical assistance. In addition, we interviewed the lead worker for Food Support, who also does some work with cash and medical assistance.

1. **Mission**. No specific program mission was given.

2. **Client Population, Program Size, and Service Areas**. This office has more single individual clients than families. The total Food Support caseload was 449 in the third quarter of 2007.

   Native Americans must self-report their Native American status. There is a place on the combined application form to indicate whether one is Native American. Specifically, on page 2 of the combined application form, there is a question that asks the applicant, "If you live on a reservation, which one?" Additionally, on page 6 of the combined application form, applicants are asked to indicate the race of each person in their household. For this question, "N" indicates American Indian/Alaska Native. The office also gives everyone a tribal member enrollment form at intake that can be completed.

The county office serves all individuals living in Mille Lacs County, which encompasses most of the Mille Lacs reservation.

3. **Eligibility.** Cash and Food Support applications have to be submitted in person, but health care assistance applications can be submitted through the mail. Minnesota uses a combined application form: Part 1 is completed by the applicant and then the applicant meets with a screener who checks to see what programs the individual is applying/eligible for and whether they qualify for expedited Food Support. Expedited Food Support provides participants with benefits within 24 hours of the time that their application is submitted.

   If those who do not need expedited Food Support arrive at the office prior to 10:30, they are seen the same day. Otherwise, they are told to come back the next day. If they cannot come back the next day, they can schedule an interview time that works for them, which is the only situation where they have scheduled interviews at the office. For disabled individuals, county staff can make home visits to complete intake interviews. Those on Food Support are also required to participate with an employment services provider. The county contracts with Pine Technical College Employment and Training Center for employment services. However, Mille Lacs County is currently exempt from FSET (Food Stamps Employment and Training) due to the high unemployment rate in the area.

   Participants are generally certified for 12 months, but if someone resides on the reservation and is working, certification is only given for 6 months. It was our understanding that this is because those living on the reservation do not have to report monthly income, while others do. The office can certify elderly receiving SSI benefits for 2 years, however, most of these participants also receive MSA (Minnesota Supplemental Aid), which requires annual recertification.

   All recertification interviews must be conducted in person. Phone interviews are done periodically for those with extenuating circumstances (the same criteria are used for home visits). Single adults who receive per capita payments and live together, but are not related, are each counted as separate households. In these situations participants do not receive much in Food Support benefits, especially if their housing costs are low. The tribal TANF program excludes the per capita payment as income for TANF eligibility, but the county Food Support program is not able to do the same. However, income that is received from land trust agreements are excluded as income when calculating Food Support benefits. Each situation has to be researched to determine whether income is counted or not, and if the county office cannot make a determination, the case is sent to the state.

   The Mille Lacs Band handles TANF cases for registered members and "Uncle Harry" cases, where children in a household are receiving MFIP and their grandparent caretakers are receiving SSI, which only counts against the grandparent's MFIP eligibility. Those living on the reservation and receiving cash assistance through the tribal TANF program also receive Food Support through the tribal TANF program. However, those living on the reservation that are Food Support only cases must apply at the county office.

   At intake a packet is given to the applicant, which includes information on other programs. Applications for health care assistance are available in other offices, but not the

combined application because it is so large. The county office sends letters with day care packets that include information on Food Support. This information is also provided to the school lunch programs in the county. The senior dining program in Mille Lacs County also has Food Support applications available. Minnesota combined application forms are also available at the Band's government center, where tribal TANF applications are also available. Individuals can also call county human services to have applications sent to them in the mail. The county can also use courtesy applications for residents of other counties and then ship them to the applicant's county of residence. Additionally, a screener is available every day for walk-ins to tell potential participants about programs offered through the county human services office.

In the past, the county office had other sites where certification could take place, including one on the reservation (at this time the office was located in Onamia), but about 15 years ago the county decided they would work out of one office.

Mille Lacs County does have some public transportation, though it does not run every day. The tribe does not provide transportation to the county office, but many native clients carpool from the reservation. Transportation is a problem in this area.

4. **State- or County-Administered.** The food stamp program in Minnesota is county-administered and state-supervised. The Mille Lacs Band, however, operates its own Food Support program through the tribally run TANF program. The band-administered public program replaced the state-administered assistance program in 1999 and emphasizes employment as a means to self-sufficiency. This is a program for families with children who are minors. It includes temporary cash assistance, Food Support, medical assistance eligibility determination, emergency assistance, and diversionary assistance.

   The cash portion of TANF is federally funded and the Band's TANF charter allows it to disregard 100 percent of the per capita payment when determining TANF eligibility. But the Food Support portion of the program is state-funded and must count the full per capita payment as income in determining eligibility for Food Support. The per capita payment from gaming is about $700 per month. Tribal members can elect to get the payment monthly, quarterly, or once per year, but for purposes of Food Support eligibility, it is still calculated as a monthly payment. Consequently, most families on tribal TANF do not qualify for Food Support., Households of 7 or more still qualify for Food Support, as do those who have garnishment such as child support payments, which are disregarded in the income calculation.

B. Nutritional issues (and how they are addressed) and Native Foods

The county office distributes brochures with recipe ideas. It also makes referrals to public health nurses. However, the main nutritional issue in this area seems to be providing enough food to low-income households. There was little discussion on the prevalence of diabetes or obesity, which we heard elsewhere.

V. Program Coordination, Participation, and Cycling

D. Coordination Between FDPIR and FSP

The FDPIR program said that it provides a monthly list of FDPIR participants to the tribal TANF program and the local Food Support office to ensure that dual participation is not occurring. The county Food Support office also calls the FDPIR program to see if a Food Support applicant is receiving commodities (the FDPIR programs calls the Food Support office to check if someone is receiving Food Support benefits), but we heard from some respondents that the Food Support office calls the tribe more than the tribe calls the Food Support office. If an applicant has checked on the Food Support application form that he or she is Native American or indicates tribal membership to the interviewer, the Food Support office will always call the FDPIR program to check that the person is not on commodities. The Food Support office used to get a monthly listing of FDPIR participants from Mille Lacs, but it has not received a list since June 2005. FDPIR applications/enrollment are not stored on a computer, but for tribal TANF (including Food Support), the tribal participants are on the same system as participants in the county program. However, due to the distribution of per capita payments and the increase in jobs, there has been an overall decrease in FDPIR and FSP participation. Staff at the FDPIR program did not think that any band members still qualified for Food Support.

If someone is certified for Food Support and wants to switch to commodities, the client cannot be taken off Food Support until the end of the month and thus would not be eligible to receive commodities until the following month. Illegal enrollment in both programs at the same time is not common. The rule is that the second program that certifies the client processes the overpayment and the individual gets charged for the amount, but there is no sanction against the client unless it can be shown that the duplication was intentional.

Per capita payments count as income against Food Support eligibility, but if a band gives up hunting and fishing rights to the state and gets a payment from the state for this, that payment, if distributed to band members, does not count as income in the way that casino profits do. Because per capita payments are only counted as income in the month that they are received for FDPIR eligibility, it can be easier to qualify for FDPIR than for SNAP/FSP, depending on how often one elects to receive benefits.

TANF benefits are limited to 60 months and now the county office is beginning to see families who have exceeded the 60 month limit and are applying for Food Support or MFIP relative care (child-only cases). For families receiving Food Support benefits, the Mille Lacs Band does replace lost EBT cards.

E. Coordination between FDPIR, FSP, and Other Programs

The FDPIR program has sponsored cooking classes organized by the Diabetes Team and sometimes helps out with other programs. The FDPIR program has also donated food for these classes in an effort to teach participants how to prepare commodity foods nutritiously.

The FDPIR program has had several clients move to other reservations and it has received calls from those tribes to check that the client was not served by the Mille Lacs FDPIR program that month.

Beginning in January 2008, Food Support benefits no longer expire within 3 months and instead can accumulate for up to 12 months. The Minnesota IOC (Issuance Operations Center) is

located in St. Paul, issues benefits statewide, and is the state office that dealt with the implementation of this legislative change.

The tribal TANF program refers TANF clients who are not eligible for Food Support to the local food shelf. There is no formal coordination between the tribal TANF and tribal WIC programs, but TANF clients are referred to the WIC program and the offices periodically call each other with questions about specific clients.

The county welfare office has MFIP workshops with information on shopping, food preparation, and making Food Support benefits last through the month. Each city also has a food shelf that is run by a church or nonprofit organization—there are food shelves in Onamia, Princeton, and Milaca. County Human services staff have a good relationship with the food shelf in Milaca and can call if they need food for a client. Additionally, there are Fair Shares (also called Food for All) in Onamia, Princeton, and Milaca. Most of the food provided through these programs is food that expires soon so one must use it right away as it is intended for emergency situations. The Salvation Army also has food vouchers for emergencies. Lastly, county Human Services participates in a 5-county group that works on a project for the homeless in which they sponsor an event where they serve a meal, give vouchers and application assistance to clients, and also provide donated clothing. The project is called Operation Community Collect and is part of Communities in Families (CIF).

F. Factors Affecting Program Participation and Cycling

FDPIR staff said that some choose Food Support rather than commodities as a matter of pride, as in the past there was a bad reputation associated with commodity food. Also, sometimes people choose SNAP/FSP benefits because they can sell them, which happens even with EBT cards. One respondent said that a stranger had approached her in a market to ask if she wanted to buy the benefits. However, fraud can also be an issue with FDPIR as we were told that farmers will buy commodities from participants to feed to their animals.

The FDPIR agency does believe that there are families that are eligible to receive benefits, yet do not. These individuals may not be interested in receiving commodities, may not want to use the time and effort to apply, or may simply not know about the program.

In regard to Food Support benefits, the elderly often think that the amount of paperwork required is too much to simply receive the minimum monthly benefits of $10. We were told repeatedly that Food Support participation would be higher if the $10 minimum allotment were increased (as was subsequently done by Congress). Also, particularly among the elderly, potential participants believe they are taking $10 from someone else who may need it more, and therefore decide against receiving benefits. Until January of 2008, benefits aged off EBT cards after only 3 months, which was another reason that some potential participants, especially those qualifying for the minimum benefit, decide not to participate. We also heard that tribal members have said that they get more food from the food distribution program than they would be able to purchase with their EBT cards, which is why they choose FDPIR over FSP. Lastly, tribal participants sometimes prefer to participate in tribal TANF because this program allows them more freedom with employment and training activities. For example, tribal members can include

activities like cultural harvesting—ricing, fishing, tanning, and beading as employment activities. Participants get paid for these activities and they are counted towards employment participation.

VI. Overall Assessment and Suggestions

A. Suggestions by Program Staff

The FDPIR program staff suggested that it would be useful if the tribes could come to a consensus along with FNS on how to make the program better for everyone. FDPIR staff appreciate how involved FNS has been in improving the program over the years. The county human services office suggested that the commodities program be expanded to a broader low income population.

B. Suggestions by Research Staff

From our discussions with FDPIR and local welfare office staff, it seems that counting per capita payments as income on a monthly basis hurts those who need benefits the most. As with FDPIR, per capita payments could count as income for Food Support only in the months in which it is received. Therefore, tribal members who elect to receive per capita payments annually with no other income would only be ineligible for Food Support for one month each year. It may also make sense to disregard per capita payments as income entirely, as is done for TANF eligibility determinations. Also, from our interviews it seems clear that increasing the minimum Food Support allotment would greatly increase program participation.

Mountain Plains Region Site Report

Lower Brule Sioux Reservation

Research Staff: Walter Hillabrant and Diane K. Levy

I. Introduction

Research staff spent one and one half days (December 11-12, 2007) on the Lower Brule Sioux Reservation for the Mountain Plains region FDPIR site visit. Reservation lands include parts of Lyman and Stanley Counties in South Dakota. The town of Lower Brule is located approximately 30 miles west of Chamberlain and 85 miles east of Pierre, the state capital. According to tribal literature, there are 2,824 enrolled members in the Lower Brule Sioux tribe, 1,447 of whom live on the reservation.

During the site visit, we interviewed the Acting Director /Certifier of the FDPIR program and met two staff who work in the warehouse and provide general program support. We conducted a group interview with four clients. We also met with the State Administrator of the Food Stamp Program.

II. Tribal Context

A. Tribal History

In 1865, the Kul Wicasa Oyate (the Lower Brule Band of the Lakota [Sioux]) and the United States government signed a treaty establishing the Lower Brule Sioux Reservation. The reservation covered 446,400 acres. The town of Lower Brule has been at its present site on the Missouri River since 1963. Prior to that year, it was located on lands that were flooded after completion of the Big Bend Dam northwest of present-day Lower Brule. Approximately 23,000 acres of Reservation lay under what is now Lake Sharpe. Tribal literature indicates the Reservation's land area today to be 245,181 acres.

Figure A-5. Missouri River near Lower Brule

B. Tribal Economy

The tribe has a farm corporation, which claims to be one of the world's largest producers of popcorn. The Corporation also grows beans (kidney, pinto, navy, and black), hay and alfalfa, soybeans, sunflowers, corn, and potatoes. In addition to agricultural products, it has a herd of Angus cows. The tribe also has a goose camp for hunters, Mni Sho Sho, which offers hunting licenses, hunting guides, and a lodge. In Lower Brule itself the tribe runs the Golden Buffalo Casino, which has a restaurant, a motel, and a convention center. Closer to the river is an RV park and camping area. The only other businesses we saw were two convenience stores, one of which had a gas station. The tribe continues to invest profits from the casino and other enterprises rather than making per capita payments to members. Other non-residential buildings in town housed government agencies, service providers, or schools. The unemployment rate among the Lower Brule Sioux in 2000 was 28%, according to US Census data.

Figure A-6. Lower Brule Casino

III. FDPIR Program

A. Program Information

1. Staff & Mission. The Acting Director of FDPIR in Lower Brule has worked with the program for five years as the Certifier. The Director, who has held that position for 30 years, is on extended sick leave. The other full-time staff member works in the warehouse filling commodity orders and helping with other work as needed. He has worked with the program for 28 years. Part-time staff include an elderly man who has helped in the warehouse for many years and two young women that have been placed in their jobs through the Vocational Rehabilitation Program and through TANF, respectively.

The mission of FDPIR, as expressed by staff, is to help needy tribal members get food.

2. Client Population, Program Size, and Service Area. Clients, age 18 to 70, live in households ranging from one to ten people. There are 38 single-person households. In 2006 FDPIR participation was 509. From 2002-2006, FDPIR participation increased 25 percent. Between 150 and 200 households were certified at the time of our visit, which represents

between 550 and 600 people. Not all households pick up commodities each month. Most FDPIR clients are employed.

The program serves people in a three-county area who live on or near the Reservation. The primary service area is Lyman County, where the majority of the Reservation's land is located. Off-reservation participants live in Brule and Stanley Counties. Participants not living on tribal lands must have one person enrolled in a tribe.

3. Eligibility. FDPIR applicants must provide proof of income (e.g., paycheck stubs or a letter from Social Security or TANF), along with the completed application form. Once FDPIR staff verifies with the Food Stamp Program that the applicant does not receive food stamp benefits, the application can be approved. This process can take as little as one day. If the applicant qualifies, he or she can get food from the FDPIR right away.

The frequency of recertification depends on the source of income, ranging from two months to one year:

- Unemployed - 2 months
- TANF - 3-4 months
- Employed - 6 months
- Social Security or Supplemental Security Income - 12 months

B. Program Operations and Services

Figure A-7. FDPIR Warehouse

1. Outreach and Access. FDPIR does little outreach. The sense is that because the program is so well known in the community, little effort is required to identify/reach prospective clients. The program usually provides snacks and juice at the annual health fair which, in effect, serves as an outreach activity, though it is not viewed in that light by staff that were interviewed.

2. Warehouse. The FDPIR building includes warehouse, distribution, kitchen, and office space. The previous warehouse was roughly one quarter the size of the current space and was separate from the distribution location, which made it difficult to fill orders. A portion of the concrete floor in the receiving area had to be replaced after a large crack

developed. The original floor had been poured without rebar support. Though improved, the new floor has developed smaller cracks. The warehouse is large and clean, with several refrigerators and freezers along two walls.

The system for placing food orders was changed in 2007. Staff are now able to order food in greater quantities than before and can access the ordering system at any time, and multiple times throughout a month. Previously, orders had to be placed by a specified date each month.

With the ability to check food availability and to place orders throughout the month, staff can order food items as soon as they become available. While this aspect of the system is seen as an improvement, it has led to staff checking the availability of food items twice a day in order not to miss out. The warehouse receives the food delivery once a month, early in the month. Fresh produce deliveries arrive separately. FDPIR staff said that the deliveries generally arrive as scheduled, even under difficult weather conditions.

Figure A-8. Pick up counter in warehouse

3. Distribution. All commodity distribution takes place at the FDPIR building, with the exception of home deliveries to elderly and disabled clients. At the time of the site visit, the program delivered food only to one household. Clients can pick up their orders anytime during program hours (Monday through Friday, 10 am to 3 pm). The building is located near other tribal services in Lower Brule.

The distribution area within the warehouse is organized so that clients stand on one side of a long, wide counter. Warehouse staff receive the order printout from the nearby office. Staff slide boxes along the counter as items are placed in them. The items on printouts follow the order of commodity location in the warehouse, which allows orders to be filled efficiently. The quantity of food a household receives depends on household size. Single-person households receive some items, such as cheese, only every other month.

4. Food Items. There have been some changes in food items over time. Since the FDPIR changed the ordering system, staff reported it has been difficult to get certain items, including tomato juice and canned pineapple. There have been positive responses to the change in macaroni-and-cheese product. Clients tend to prefer the new product over the old one. As at other sites, butter and shortening have been removed from the list of available items. Staff

planned ahead by stocking up on these items; the program still had a few months' supply at the time of our visit. Once that stock runs out, staff anticipate that clients will be upset. The site participates in the fresh produce program, which staff and clients agree is popular. There is interest in fresh milk and fresh eggs, especially in light of the high cost of milk at a local convenience store. UHT 1% milk has been added to the FDPIR package since our visit.

The commodities had a mix of name-brand and generic labels. Staff said that the labels do not matter to customers. The clients with whom we met agreed, saying the labels look better now compared to the older plain labels, but they do not care about the labels.

Native Foods The program has received buffalo meat occasionally, most recently in FY 2006. This item is popular with clients; staff would like it to be made available more often. Buffalo is the only traditional food the program offers. Clients said that they like buffalo meat because it is healthier than other meats. However, they do not think people care much about traditional foods per se.

C. Nutrition Education

The program does not offer nutrition programming, though staff expressed interest in offering cooking and baking classes or demonstrations. Staff are working on a cookbook. When cookbooks have been made available in the past, they have been popular with clients. Free copies of the "*Healthy Mind, Body and Spirit!*" newsletter were available, each issue of which includes recipes, but they were not prominently displayed. Also, there were nutrition-information posters on the bulletin boards.

Figure A-9. One of two convenience stores in Lower Brule

IV. Food Stamp Program

A. Program Information

We interviewed the State Administrator with the Office of Food Stamps in the Department of Social Services at the request of the Administrator, because field staff in the office that serves residents of Lower Brule were busy. The state's SNAP/FSP has low error rates and high customer satisfaction and is considered among the best in the country, according to staff.

SNAP/FSP offers five service modes: full-time offices, itinerant offices, home visits, telephone calls, and mail. The SNAP/FSP office in Chamberlain serves residents of Buffalo and Lyman Counties. The office is located 31 miles east of Lower Brule. It has a part-time supervisor, four Benefits Specialists, and one clerical staff.

1. Mission. No program mission was provided.

2. Client Population, Program Size, and Service Areas. At the state level, the SNAP/FSP grew 10.4 percent between November 2005 and 2007. From November 2006 to 2007 the client population increased seven percent. It now is the highest it ever has been, which staff could not explain, though they wondered if the population has increased. Within Region 4, which includes Lower Brule, the program grew 11 percent during the same period. In November 2007, SNAP/FSP participation in Lyman County, home to Lower Brule, stood at 158 households (507 individuals). This was higher than the average FY06 figures of 141 households and 446 members. Of the caseload, 20 percent were White and 83 percent were Native Americans. The average household size was 3.21 persons. The majority of households, 65, reported earned income, while just over one-third reported no income.

3. Eligibility. Prospective clients may submit the food stamps application either in person or via telephone. As part of their application, applicants must provide verification of their identity, residency, and income. Prior to approval, applicants must meet with a Benefits Specialist (a caseworker). SNAP/FSP staff contact FDPIR offices to verify an applicant is not receiving food commodities. Applications are approved or denied within 30 days, though expedited applications can take as little as seven days. SNAP/FSP receives many expedited applications, especially from people living on reservations.

For purposes of eligibility and benefits receipt, "household" is defined as people who live together, and purchase and prepare food together. If two households in need of benefits live within one house, both could receive benefits separately, or one could receive food stamps and the other could receive commodities. It is frequent to find dual household homes on reservations.

With the exception of the elderly and disabled, all clients must submit a monthly report of income and household status. South Dakota is one of the few states that continue to require monthly reporting. FNS allows six-month reporting, toward which South Dakota is moving. Participants are recertified every 12 months unless they live on a reservation, in which case they are recertified every 24 months. Participants who have reported monthly can recertify through mail. Those who have not reported monthly must come to an office, have an in-home meeting, or recertify over the telephone (i.e., there must be contact).

4. State or County Administered. The food stamp program in South Dakota is run by the state. The state is divided into eight regions, each of which has one Regional Manager who supervises the Field Supervisors in their area. Region 4, which includes Lower Brule, consists of nine counties. The Office of Food Stamps is located within the Division of Economic Assistance of the Department of Social Services.

B. Nutritional Issues

The SNAP/FSP has a nutrition education grant under which it partners with South Dakota State University's nutrition program for extension services. Through the program, school teachers are trained how to teach nutrition. The program also includes a monthly newsletter, with nutrition information, recipes, and so on, that food stamp clients can pick up from program offices. The newsletter is mailed to households in very rural areas. A DVD on nutrition was developed for use in food stamp offices. It was piloted on a few reservations, which indicated that the materials needed revision; these revisions are in progress.

V. Program Coordination, Participation, and Cycling

A. Coordination Between FDPIR and SNAP/FSP

Coordination between the two food support programs is limited to each program's application verification process. Staff of each program contact the other program's office to verify an applicant is not currently receiving benefits. Food stamp program staff also send an inter-agency notice with a list of SNAP/FSP clients to other benefits programs once a new client is accepted. FDPIR staff was unsure if the SNAP/FSP office in Chamberlain has information on FDPIR available to clients, though SNAP/FSP staff indicated that, should an applicant be better served by FDPIR, they will refer the applicant to the other program. Staff of both FDPIR and SNAP/FSP described the working relationship between the programs as cooperative and good.

B. Coordination Between FDPIR, SNAP/FSP, and Other Programs

FDPIR does not coordinate with other programs. Though there is a diabetic clinic in town that offers vouchers for fresh fruits and vegetables and WIC, FDPIR works wholly independent of it. The only mention of working with another group was the request from an "alcohol program" to provide snacks at its annual health fair.

SNAP/FSP staff, by design, must be knowledgeable about other assistance programs. Front line staff are generalists who are charged with helping people access the services they need even when those services are provided by a different agency. This model of social service is described as "no wrong door"—a person can find out about TANF, Medicaid, food assistance programs, and so on from SNAP/FSP case workers. SNAP/FSP staff participate in monthly inter-agency meetings at which staff from SNAP/FSP, FDPIR, WIC, Housing, TANF, corrections, and other agencies talk about what is happening in their respective organizations. The meetings have proved useful for sharing information on new initiatives, discussing problems, and development networks among agencies. Food stamp staff believe the meetings help make their "no wrong door" model of service delivery work.

In addition to its participation in the inter-agency meetings, SNAP/FSP has a nutrition education grant in partnership with the South Dakota State University's nutrition program for extension services. The grant supports a program to train teachers on how to teach nutrition and a monthly nutrition newsletter that is available to SNAP/FSP clients.

C. Factors Affecting Program Participation and Cycling

FDPIR staff identified three factors believed to affect program participation and cycling between programs: reliable transportation, amount of paperwork, and household income.

- **Transportation:** At Lower Brule, the FDPIR building is located at the population center on the reservation. Households without a vehicle, or without a reliable means of transportation, are more likely to sign onto FDPIR than SNAP/FSP because both the SNAP/FSP office and affordable grocery stores are located more than 30 miles away. Also, FDPIR allows multiple visits during the month to pick up the month's worth of commodities, which is especially convenient for participants with few transportation options.

- **Paperwork:** The SNAP/FSP requires copies of a participant's social security card, birth certificate, rent or utility bills, and a monthly "green form" with paycheck stubs. Some people who submit their monthly paperwork late will switch to FDPIR, at least for that month. People view the paperwork for food stamp benefits as burdensome relative to the FDPIR requirements.
- **Household Income:** One of the main reasons a household would not sign up for commodities is having an income above the eligibility level.

FDPIR clients would add one more reason affecting the selection of a food support program—household size. One participant in the group discussion prefers FDPIR because as a one-person household, he receives more food than he would through food stamps. Another person receives SNAP/FSP because she receives more as a two-person household than she would if she still received commodities, which she did just one month prior to our visit. This former client commented that she would switch back to commodities if she were able to receive the same quantity of food because she thinks the food, lower in salt and sugar, is healthier than that available at local grocery stores.

SNAP/FSP staff pointed out that disqualification from food stamp benefits is another reason households might apply for FDPIR. People are disqualified if they are a fleeing felon ('wanted'), on probation or parole, or have been convicted of a drug felony since 1996, when PROWRA went into effect. Food stamp clients might still qualify for FDPIR even though disqualified for food stamps, unless they were disqualified for fraud. One of the group discussion participants offers an example. He received food stamp benefits in the past, preferring them to commodities because of the greater choice allowed. He and his family receive commodities now because he was convicted of a drug felony. This particular felony conviction disqualifies him from food stamp benefits though not from FDPIR. Since our visit, South Dakota has dropped its ban on SNAP/FSP benefits for felons (FNS 2009).

FDPIR staff were not certain about the causes of program growth, but thought it might be due to the return of people from SNAP/FSP. FDPIR is easier to participate in, the distribution location is closer to people's homes, and clients can pick up food more than once a month without traveling far. Staff think seasonal factors also have an impact. Construction layoffs in the winter lead to increased participation. Interestingly, higher household income during warmer months also could lead people to FDPIR, which unlike SNAP/FSP has no gross income limit. Fewer households likely will qualify for food stamps once income increases.

SNAP/FSP participation is the highest it ever has been, as noted above. Seasonal fluctuation follows employment opportunities—client numbers increase October through February and decrease beginning in March each year once construction and tourism jobs open.

FDPIR staff talked about reasons people come to the commodity program from SNAP/FSP. SNAP/FSP staff spoke about the flip side of that movement. Staff perceive greater movement from FDPIR to SNAP/FSP. Likely reasons include client access to a greater variety of foods and greater privacy through use of the EBT card, which is not as public an action as picking up commodities from program distribution sites. Staff also see clients suspending food stamp benefits for a month when household income increases, during which time they can apply for and receive commodities. They can reactivate food stamp benefits once they meet program eligibility

requirements again. Another reason for short-term shifts between programs is to stock up on basic commodities for a month or two, then reactivate food stamp benefits.

Though SNAP/FSP staff offered these reasons for clients choosing SNAP/FSP over FDPIR or for cycling between the programs, staff identified three factors believed to be key for deciding between the two programs: 1) the amount of benefits for which a household will be eligible, 2) the amount of required paperwork (higher with SNAP/FSP), and 3) the level of stigma (SNAP/FSP benefits are considered "welfare," so carry more stigma than FDPIR commodities) at least when purchasing food outside of the Reservation. It is interesting to note that staff said EBT affords private receipt of food assistance, which could reduce stigma, yet SNAP/FSP benefits carry greater stigma because they are considered welfare. Some FDPIR staff also spoke disapprovingly of fraudulent use of EBT cards, not necessarily by tribal members, noting that SNAP/FSP recipients can sell their EBT card, at a discount. These staff also noted, with disapproval, that Food Stamp recipients often purchase foods that have "empty calories" or are otherwise not healthy.

VI. Overall Assessment and Suggestions

A. Suggestions by Program Staff

FDPIR staff say they would save considerable time if they were able to place orders for items not immediately available rather than checking on item availability a couple of times each day. Staff would also like to see a change in the commodities allotment for single-person households so that these households could receive items now available only every other month on a monthly basis.

SNAP/FSP staff would like to see the minimum benefit level for one and two person households increased and would like the asset limits increased. Both of these changes were made subsequent to our visit. Staff also said they would like to see the state's options for program administration increased.

B. Suggestions by Clients

FDPIR clients' suggestions for the program centered on increasing food variety. People would like a greater variety of meats and fruit, and would like snacks to be available, such as the trail mix that had been available in the past. Another suggestion was to increase the income limit and to take household expenses into account when determining the amount of benefits.

Mountain Plains Region Site Report

Crow Creek Sioux Reservation

Research Staff: Walter Hillabrant and Diane K. Levy

I. Introduction

Research staff spent one half day meeting with FDPIR staff on the Crow Creek Sioux Reservation as part of the Mountain Plains region FDPIR site visit (December 12, 2007). The reservation is located on the northeast side of the Missouri River in Buffalo, Hughes, and Hyde Counties in South Dakota, approximately 14 miles east of Lower Brule. The FDPIR building is in Ft. Thompson, in Buffalo County, about 26 miles northwest of Chamberlain. There are approximately 3,000 enrolled members. About 2,800 people live on the reservation.

During the site visit, we interviewed the Director of the FDPIR program and met the Certifier and the Director's daughter, who helps in the office. We also met with the State Administrator of the Food Stamp Program.

II. Tribal Context

A. Tribal History

The Crow Creek Sioux relocated to the reservation on the Missouri River following signing of a treaty in 1863. An 1889 Act increased the size of the reservation, though the land base subsequently was reduced by about half through Homestead Acts that granted land to white settlers. Today the reservation's land area is 225,000 acres, 16,000 acres of which are taken for reservoirs. Similar to the Lower Brule Sioux, the Crow Creek Sioux community of Fort Thompson had to move to higher ground once dams on the Missouri River flooded river bottom lands. Fort Thompson is home to the majority of people who live on the reservation.

B. Tribal Economy

The tribal economy is based in cattle ranching and farming. The tribe operates the Big Bend Farm Corporation. It also offers guided hunting trips and a goose camp hunting operation. The Lode Star Casino is located in Fort Thompson. Elderly tribal members receive $20 a month in casino per capita payments. The unemployment rate among the Crow Creek Sioux in 2000 was 22 percent, according to US Census data.

III. FDPIR Program

A. Program Information

1. Staff

The Director of FDPIR in Fort Thompson has held that position since 1982 with the exception of a two-year period. The other staff person we met was the Certifier. The Director's daughter helps out in the office.

2. Client Population, Program Size, and Service Area

Most of the households in the program have three to six people. Since the mid-1990s, when the program ended tailgate distribution, people who live 30 or more miles away from the warehouse have turned to SNAP/FSP for food support. In 2006 FDPIR participation was 287. From 2002-2006, FDPIR participation decreased seven percent. There are about 110 households certified at present. According to program staff, FDPIR serves households in Buffalo County.

3. Eligibility

The application process and eligibility determination are handled much the same way as described by staff at Lower Brule. The Certifier takes applications and gathers information on the number of people in the household. Staff check with the Food Stamp Program office in Chamberlain to make sure the applicant is not receiving food stamp benefits. FDPIR clients must recertify every three to twelve months, depending on the type of income they receive.

B. Program Operations and Services

1. Outreach and Access

Not discussed.

2. Warehouse

FDPIR moved into its current location in 2000. The tribal council owned the existing building, and finally granted the space to the commodity program. FDPIR has renovated the building over time, in two sections. The building has a large administrative office with windows, a good sized kitchen, a bathroom, and the warehouse and docking area, which take up the majority of the space. The program is run from this one location. Before moving to the current building, the program was run out of the basement of the tribal council building. There was no elevator down to the very small space, which made distribution difficult, and the space had asbestos.

The warehouse area is smaller than the one on the Lower Brule reservation, though it seemed large enough. The space was clean, well organized, and had several refrigerators and freezers. There were nutrition posters on the walls in the area where clients wait for their food.

3. Distribution

FDPIR had tailgate sites for food distribution until the mid-1990s. Since then clients must come to the warehouse to pick up commodities. Staff do provide home delivery for elderly and handicapped clients. In December 2007 about 30 households received delivery services. Food quantity is determined by size of household.

4. Food Items

According to staff, clients like the fresh produce program. Staff would like to see other fresh foods become available, such as milk and eggs. (UHT 1% fluid milk has been added to the package since our site visit.) Clients are unhappy about the loss of butter, shortening, and corn syrup—enough so that some people have written letters to complain. Other items that staff say people would like again include trail mix, almonds, honey, and pork. Some of these items have not been available for four or five years.[28] Additional food items on the staff's wish list include baby foods, cream soups, buffalo meat (on a regular basis), and buffalo and beef stew meats.

As at Lower Brule, there was a mix of name brand labels and generic labels. Unlike at Lower Brule, some of the canned food labels were the old style—black-and-white labels with a picture representing the food inside (for example, a label with a picture of a chicken). Staff never has heard complaints about labels, but commented that the cans do look better now.

Native Foods

Staff would like to receive buffalo meat and buffalo stew more regularly. However, staff commented that people here do not eat many traditional foods. The tribe used to have a buffalo herd but it was sold. The herd was not managed well, and hunters with permits would kill more than allowed and would kill the wrong buffalo.

C. Nutrition Education

About once a month staff cook a dish and offer tastes and the recipe to people when they pick up their food. There were copies of a cookbook and of the *Healthy Mind, Body and Spirit!* newsletter in the office, and nutrition posters on the walls of the warehouse area where participants would see them. Staff produced a flier for households with obese children or grandchildren. The three-page document discusses causes of obesity, how to recognize and address it, the relationship between obesity and asthma, and suggestions for healthy eating and drinking.

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[28] FNS has deemed honey inappropriate because it can cause botulism poisoning in infants. Canned pork was deleted from the food package by the FDPIR Food Package Review Work Group.

IV. Food Stamp Program

With the exception of information specific to the Crow Creek Sioux and Fort Thompson, the information below is the same as that in the case study of the Lower Brule Sioux.

A. Program Information

We interviewed the State Administrator with the Office of Food Stamps in the Department of Social Services at the request of the Administrator. The state's SNAP/FSP is considered among the best in the country, according to staff.

SNAP/FSP offers five service modes: full-time offices, itinerant offices, home visits, telephone calls, and mail. The SNAP/FSP office in Chamberlain serves residents of Buffalo and Lyman Counties. The office is located 26 miles east of Fort Thompson. It has a part-time supervisor, four Benefits Specialists, and one clerical staff.

1. Mission

No program mission was given.

2. Client Population, Program Size, and Service Areas

At the state level, the SNAP/FSP grew 10. 4 percent between November 2005 and 2007. From November 2006 to 2007 the client population increased seven percent. It now is the highest it ever has been, which staff could not explain though they wondered if the population has increased. Within Region 4, which includes Fort Thompson, the program grew 11 percent during the same period. In November 2007, SNAP/FSP participation in Buffalo County, home to Fort Thompson, stood at 184 households (581 individuals). This was higher than the average FY06 figures of 163 households and 544 members. Of the caseload, 14 percent were White and 92 percent were Native Americans. The average household size was 3. 16 persons. The majority of households, 75, reported earned income, while 42 reported no income of any kind.

3. Eligibility

Prospective clients may submit the SNAP/FSP application either in person or via telephone. As part of their application, applicants must provide verification of their identity, residency, and income. Prior to approval, applicants must meet with a Benefits Specialist (a caseworker). SNAP/FSP staff contact FDPIR offices to verify an applicant is not receiving food commodities. Applications are approved or denied within 30 days, though expedited applications can take as little as seven days. SNAP/FSP receives many expedited applications, especially from people living on reservations.

For purposes of eligibility and benefits receipt, "household" is defined as people who live together, and purchase and prepare food together. If two households in need of benefits live within one house, both could receive benefits separately, or one could receive food stamps and the other could receive commodities. It is frequent to find dual household homes on reservations.

With the exception of the elderly and disabled, all clients must submit a monthly report. South Dakota is one of the few states left that requires monthly reporting. FNS allows six-month reporting, which South Dakota is moving toward. Participants are recertified every 12 months unless they live on a reservation, in which case they are recertified every 24 months. Participants who have reported monthly can recertify through mail. Those who have not reported monthly must come to an office, have in in-home meeting, or recertify over the telephone (i.e., there must be contact).

4. State or County Administered

The food stamp program in South Dakota is run by the state. The state is divided into eight regions, each of which has one Regional Manager who supervises the Field Supervisors in their area. Region 4, which includes Fort Thompson, consists of nine counties. The Office of Food Stamps is located within the division of Economic Assistance of the Department of Social Services.

B. Nutritional Issues

SNAP/FSP has a nutrition education grant under which it partners with South Dakota State University's nutrition program for extension services. Through the program, school teachers are trained how to teach nutrition. The program also includes a monthly newsletter, with nutrition information, recipes, and so on, that food stamp clients can pick up from program offices. The newsletter is mailed to households in very rural areas. A DVD on nutrition was developed for use in food stamp offices. It was piloted on a few reservations, but the quality and the content needed work; the revisions are in progress.

V. Program Coordination, Participation, and Cycling

A. Coordination Between FDPIR and SNAP/FSP

Coordination between the FDPIR and SNAP/FSP programs is limited to the contact staff from one program make with the other when checking to ensure a program applicant is not on the other program's rolls.

B. Coordination between FDPIR, SNAP/FSP, and Other Programs

FDPIR staff contact the dietitian at the IHS office when they need nutrition information. Staff also attend monthly wellness meetings at Head Start to learn about different topics. A recent meeting focused on suicide.

Staff also serve on the Mountain Plains Nutrition Advisory Committee, which convenes once or twice a year. The Director helps develop a wall calendar and works on the quarterly newsletter, *Healthy Mind, Body and Spirit*. The committee has focused on issues of diabetes and obesity.

SNAP/FSP staff, by design, must be knowledgeable about other assistance programs. Front line staff are generalists who are charged with helping people access the services they need even when those services are provided by a different agency. This model of social service is

described as “no wrong door” – that a person can find out about TANF, Medicaid, food assistance programs, and so on from food stamp case workers. Food stamp staff participate in monthly inter-agency meetings at which staff from SNAP/FSP, FDPIR, WIC, Housing, TANF, corrections, and other agencies talk about what is happening in their respective agencies. The meetings have proved useful for sharing information on new initiatives, discussing problems, and development networks among agencies. Food stamp staff believe the meetings help make their “no wrong door” model of service delivery work.

In addition to its participation in the inter-agency meetings, SNAP/FSP has a nutrition education grant in partnership with the South Dakota State University’s nutrition program for extension services. The grant supports a program to train teachers on how to teach nutrition and a monthly nutrition newsletter that is available to SNAP/FSP clients.

C. Factors Affecting Program Participation and Cycling

FDPIR staff discussed a number of factors they believe affect program participation and cycling. Factors that draw participants to FDPIR include larger quantities of food, especially for smaller households (with the exception of a single-person household), the lower frequency of recertification (from 3 to 12 months) relative to SNAP/FSP monthly reporting requirement, school employees’ loss of income during summer months, and the ability to stock up on canned and dry goods for one or two months. Factors that discourage FDPIR participation include lack of tailgate distribution, limits on the variety of foods, and stricter certification—SNAP/FSP will certify an applicant even if the person lives in a household with someone who has a higher income whereas FDPIR considers everyone living in the household when identifying household composition.

When asked what would help the program grow, FDPIR staff talked about changes that would need to occur to SNAP/FSP rather than changes that FDPIR itself could make. Staff said SNAP/FSP would have to regulate the use of EBT cards in terms of allowable purchases and use of the card itself. People can buy ice cream, candy, and pop, and how children are allowed to use their parents’ EBT card. The leniency of SNAP/FSP in terms of foods that can be purchased and the ability of people to sell their EBT cards are factors that draw people to SNAP/FSP. As mentioned above, staff said that the SNAP/FSP certification process will approve someone for benefits even if there is a household member with higher income because household composition is figured differently between the two programs.

SNAP/FSP staff pointed out that disqualification from food stamp benefits is another reason households might apply for FDPIR. People are disqualified if they are a fleeing felon (‘wanted’), on probation or parole, or have been convicted of a drug felony since 1996, when PROWRA went into effect. Clients might still qualify for FDPIR even though they were disqualified for SNAP/FSP, unless they were disqualified for fraud. Since our visit, South Dakota has dropped its ban on SNAP/FSP benefits for felons (FNS 2009).

SNAP/FSP staff also perceive greater movement from FDPIR to SNAP/FSP. Likely reasons include client access to a greater variety of foods and greater privacy through use of the EBT card, which is not as public an action as picking up commodities from program distribution sites. Staff also see clients suspending SNAP/FSP benefits for a month when household income

increases, during which time they can apply for and receive commodities. They can reactivate food stamp benefits once they meet program eligibility requirements again. Another reason for short-term shifts between programs is to stock up on basic commodities for a month or two, then reactivate food stamp benefits.

Though SNAP/FSP staff offered these reasons for clients choosing SNAP/FSP over FDPIR or for cycling between the programs, staff identified three factors as key for deciding between the two programs: the amount of benefits for which a household will be eligible, the amount of required paperwork (higher with SNAP/FSP), and the level of stigma (SNAP/FSP benefits are considered "welfare," so carry more stigma than FDPIR commodities).

VI. Overall Assessment and Suggestions

A. Suggestions by Program Staff

FDPIR staff would like to see the food items mentioned above become available. Though staff talked about the loss of the tailgate sites, they did not mention any efforts to start them again.

Most of staffs' comments about changes they would like to see had to do with SNAP/FSP—limiting who has access to the EBT card within receiving households, restricting items approved for purchase, and closing down the ability to sell EBT cards.

SNAP/FSP staff would like to see the minimum benefit level for one and two person households increased and would like the asset limits increased. (Both of these were done after our visit.) Staff also said they would like to see the state's options for program administration expanded.

B. Suggestions by Clients

We did not speak with clients at the Crow Creek Sioux FDPIR program.

Southwest Region Site Report

Chickasaw Nation

Research Staff: Nancy Pindus and Walter Hillabrant

I. Introduction

Research staff spent three days (Monday, March 17, 2008 through Wednesday, March 19, 2008) visiting the headquarters of the Chickasaw Nation Nutrition Services Program in Ada, Oklahoma and the main office of the Chickasaw Nation FDP Program in Ardmore, Oklahoma for the Southwest region FDPIR site visit. The Chickasaw Nation's jurisdictional territory includes more than 7,648 square miles of south-central Oklahoma and encompasses all or parts of 13 Oklahoma counties. At the Chickasaw Nation, we conducted eight formal interviews, which included the Director of Nutrition Services, the FDP Director, the Ardmore FDP Site Supervisor, the Warehouse Supervisor, the WIC Program Manager, the Farmers' Market Program Manager, food demonstration/nutrition education program staff, and Community Health Representatives. We also toured the warehouses and the FDP stores at the Ada and Ardmore FDP locations.

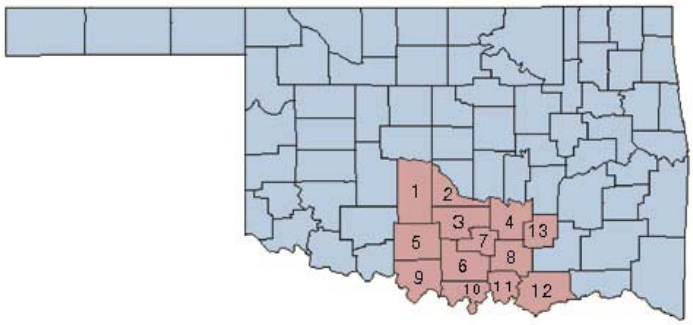

Figure A-10. Chickasaw Nation jurisdictional areas

The Nutrition Services Director has been employed by the Chickasaw Nation for 22 years and the FDP Manager for 19 years, 10 of those with FDP.

In addition to interviews with program staff, we conducted two focus groups with current and former FDP and SNAP/FSP recipients. The focus group in Ada consisted of 11 women and 2 men ranging in age from under 30 to over 60. The number of children under the age of 18 living in the participants' homes ranged from none to three, and the household size (including the participant) ranged from one to eight. At the time of the focus group, 11 of the participants were currently enrolled in FDP, and none were in SNAP/FSP (although several reported receiving food stamps in the past). Two participants were not enrolled in either program at the time of the focus group. The focus group in Ardmore consisted of 14 participants, all women, ranging in age from under 30 to over 60. The number of children under the age of 18 living in the participants' homes ranged from none to five and the household size (including the participant) ranged from

one to eight. At the time of the focus group, 10 participants were enrolled in FDP and 3 were enrolled in SNAP/FSP.[29]

The site visit also included interviews with staff at the local welfare offices (Department of Human Services) in Pontotoc and Carter Counties, which serve members of Chickasaw Nation. We interviewed two supervisors and two eligibility workers at the Pontotoc County office in Ada. At the Carter County office in Ardmore, we interviewed four supervisors and three family support workers.

II. Tribal and State Context

A. Tribal Background

The Chickasaw Nation has been successful in a wide range of economic development efforts and is a major employer and source of community support in the area, especially in Ada, where the tribal headquarters are located. Respondents indicated that a major reason the tribe has been so successful at integrating programs in the community and building program facilities is that they have had consistent leadership for 21 years—Governor Anoatubby is in his sixth term as the tribe's leader. Although the Chickasaw Nation operates several successful businesses, it has no per capita payment. The majority of tribal business profits are used for tribal services. Tribal enrollment is around 38,000.

1. Organizational Background and Overview of Nutrition Services. Chickasaw Nation took over its own health care system from IHS in a 1994 compact, and Nutrition Services is part of the tribal health system. The tribal health system is building a new hospital on the east side of Ada—the current hospital supports more than 200,000 patient visits a year, and was designed to accommodate only 20,500 annual patient visits. The health system is operated by the tribe and will serve any Native American from a federally recognized tribe. Nine tribes are in a compact in Ada, and they are all automatically served by the Chickasaw Nation Health System.

The Chickasaw Nation FDP program is part of the tribe's Nutrition Services within the tribe's Division of Health System. This came about because WIC was always an adjunct to health, so it made sense to program management to call the overall program Nutrition Services rather than Community Assistance. Nutrition Services includes WIC, FDP, Farmers' Market (WIC and senior), Food Stamp Nutrition Education (called the "Get Fresh" program, and food services/nutrition counseling for health systems patients. The Director of Nutrition Services is a registered dietitian and has an MS in nutrition.

B. Tribal Economy

Successful economic development is an integral part of the effort to enhance the quality of life of Chickasaw people. Chickasaw Nation business revenues provide tens of millions in

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[29] We are missing data for one participant.

additional funding that is channeled into programs and services for tribal citizens. For FY 2008, more than $100 million in business revenues were budgeted to fund these tribal programs and services. Chickasaw Nation business revenues enable the tribe to supplement federally funded programs. The tribe also provides additional programs and services solely funded by the Chickasaw Nation. The tribe's commerce division employs approximately 6,500 workers in more than 50 businesses. These businesses include Bedre Chocolates, motels, restaurants, radio stations, a newspaper, travel plazas, gaming centers, and others. Bedre Chocolates produces fine quality European-style gourmet chocolate in its state-of the-art production facility near Pauls Valley, Oklahoma. Riverwind Casino near Norman and WinStar Casinos near the Texas-Oklahoma border are two of the largest gaming facilities in Oklahoma. Chickasaw Nation Industries, Inc. currently provides jobs for approximately 2,000 employees worldwide in occupations including technology, manufacturing, medical, and construction management services. Solara Healthcare, another tribally-owned business, operates eight facilities that provide high quality long-term care. Expansion in business diversity has created much growth for the tribe. In 1987, the Chickasaw Nation's total operating outlays were less than $11 million. Capital outlays for 2008 were approximately $350 million. According to the U.S. Bureau of Labor Statistics, the 2007 unemployment rate in both Carter and Pontotoc counties was 3.8 percent.

C. FDP

Program Information

1. Mission. The intent of FDP is supplemental, but program managers and staff know that for many participants, this is their main source of food.

2. Client Population, Program Size, and Service Area. The Chickasaw Nation FDP serves 13 ½ counties (the half county is a county that is shared with the Choctaw Nation). The program boundaries are: North: Norman; South: Oklahoma/Texas border; East: Choctaw Nation; West: 40-50 miles west of I-35. The Chickasaw Nation FDP staff have a good working relationship with Choctaw Nation, and each tribe will serve the other's members if it is more convenient for the client. The Chickasaw Nation FDP received an urban waiver in February 2000. Prior to that, it could not serve anyone residing in a city with a population of over 10,000, which included Ada, Ardmore, and two other cities. Respondents reported that the waiver was more beneficial to the elderly because their Food Stamp amounts are so low. Some people in the cities with waivers are still not aware of the change and don't know that they can get FDP. Some tribes in Oklahoma don't have an urban waiver.

For the period October 2007 through mid-March 2008, Chickasaw Nation FDP served 21, 590 participants in their five sites, as follows:

Ada: 7,538 participants

Ardmore: 9,815 participants

Purcell: 3,735 participants

Marlow: 237 participants

Achille: 265 participants.

The Ardmore location serves more participants than Ada, but it serves a larger geographic area—some participants live as far as 1 ½ hours away. FDP staff noted that participation is lower in February through March when people receive tax refunds. For sites that operate stores, usually about half of the caseload picks up food in the first two weeks of the month, with many coming in the first day of the month.

Figure A-11. Chickasaw FDP Ada offices

Elders are about one-third of FDP clients. Most of the other participants are families with children.

3. Eligibility. Certification is for 6 months; elderly on fixed incomes and SSI recipients are certified for one year. An individual with no income is certified for two months at a time, or for an exact time if, for example, the a applicant receives unemployment compensation, knows when it ends, and expects to have a job by then. When an individual comes in for certification or recertification, the FDP worker calls the county DHS office where the applicant resides to verify that the participant is not on SNAP/FSP. This is a routine process—the FDP worker reads the SSN of each household member and the DHS worker checks that they are not on SNAP/FSP.

In Ardmore, FDP workers usually call Carter County, and sometimes Bryan, Marshall, Love, Jefferson, or Stevens Counties to check on SNAP/FSP enrollment. The Chickasaw FDP program uses a computerized system for enrollment and certification. Participant information is stored by SSN. It generally takes 15 minutes maximum per client for recertification; a new client takes 15-20 minutes. The process involves interviewing the participant and completing information on the computer. For recertification, the process involves updating and verifying information in the participant's record. The certification form requests information about all household members. The FDP worker enters information on biweekly wages, other sources of income (e.g., Social Security, disability income), and cash resources for all household members.

The Chickasaw Nation's FDP system computes the client's monthly income and the worksheet indicates whether the household is income eligible. There is also an open field for progress notes. The completed application, eligibility sheet, and income worksheet are then printed, dated, signed, and filed. If the household is income eligible and all information has been provided (e.g., verification of earnings), the FDP worker activates the case. The FDP staff provide each participant with a paper card to present at pick-ups—participants must have this card or a photo ID to pick up food. They now prepare this card by hand, but the program is planning to start using a machine that can prepare cards with a client's picture.

B. Program Operations and Services

The Chickasaw Nation Nutrition Services has a good telecommunications system and a computerized certification system. FDP is integrated with the IT department for the Chickasaw Nation. The telephone system is voice over internet across all of the offices, so staff can just dial an extension for any of the locations; all of the offices are networked together so staff can see reports for all facilities from any site. The FDP Manager's main office is in Ardmore, but she is in Ada at least one day per week and sometimes more because the tribal headquarters and nutrition services headquarters are there.

Figure A-12. Ada FDP store

The Chickasaw Nation FDP just implemented a new certification module that is part of the Great Plains system used by the tribe. The Chickasaw Nation FDP was still using its old AS-400 system while developing the certification software. But in November 2007, the AS-400 died and the Chickasaw Nation IT department had to work to get the certification system up on the Great Plains System. The IT staff did this quickly and the system is working well. With the Great Plains system, FDP can also get reports for other programs. In December 2007, the IT department hired someone with an accounting and grocery store background to work with the FDP.

The Chickasaw Nation FDP uses "stores" as its primary mechanism for food distribution. The stores are set up to emulate supermarket settings and enable participants to select products themselves based on the benefit package for which they qualify.[30]

1. Outreach and Access. Community Health Representatives (CHRs) conduct outreach for FDP as well as other programs. The tribe also hired a new person to conduct outreach specifically for FDP—this person will be visiting participants to ask about customer service.

CHRs have helped make the store program very successful—they shop for elderly/disabled clients, unpack packages, and put food away for them. In the focus group, all but one participant was aware that CHRs could pick up and deliver groceries for elderly or disabled participants. Focus group participants also noted that CHRs will take the elderly to the farmers'

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[30] Other tribes that have FDP stores are: Creek, Seminole, Cherokee, Sac and Fox, all in Oklahoma, and Five Sandoval, in New Mexico. The Five Sandoval FDP Director came to visit the Chickasaw program. The Chickasaw staff shared what they had learned and shared their IT system information.

market. Once a year, FDP has a CHR appreciation day and provides training for CHRs; FDP gives CHRs "ask a dietitian" cards with nutrition questions on them that they can give out to participants. The FDPs try to support the CHRs in any way they can. For example, the FDP Manager asked CHRs what they needed, and they said that carrying packages hurt their backs, but that they had no room for dollies in their cars, so the FDP program bought collapsible dollies for the CHRs. When CHRs come to the FDP store to shop for participants, FDP staff help them to speed things up. They view CHRs as a being in a serving role. The Chickasaw Nation has a transportation department, so CHRs don't transport patients anymore.

Despite the large area served, most participants come to a store on their own or have someone bring them. For example, it was reported that only about one to five participants use the Chickasaw Nation Transportation Department to get to the Ardmore store. With the increase in gasoline costs, some participants near Durant, Oklahoma want to transfer to the Choctaw FDP program because it is closer—this is up to the FDP Program Manager and the Nutrition Services Director. Their view is that, while the program doesn't want to lose clients to the Choctaw Nation, they will approve a transfer for health or other reasons. Focus group participants in Ada were aware of the Chickasaw Nation's Transportation Department, which is available to everyone, but noted that you must call in advance to schedule a ride.

2. Inventory System and Warehouse. The Chickasaw Nation FDP does not use the AIS ordering system.[31] The inventory system uses the Great Plains software system, including a customized certification piece. With this inventory system, the warehouse manager can pull up inventory reports for the whole program. The truck goes to all three sites (Ada, Ardmore, and Purcell), even though Ada is where the main warehouse is located. Previously, FDP had to keep three months of food on hand and all food was delivered to the Ada warehouse. The inventory system has reduced the need to move food around between sites.

Figure A-13. Ardmore FDP warehouse

Program managers really like the Great Plains system. They looked at "canned" Point of Service (POS) software, but the tribe hired a new Chief Information Officer and he suggested

[31] Respondents were not aware of any problems with AIS; they just went with the system that was used for other Chickasaw programs. There are other tribes that have stores and they all use AIS.

using the Great Plains inventory module for FDP because the tribe already had the Great Plains system for financial management, etc. The tribe contracted with a programmer in Tulsa to customize it.

We toured the warehouses in Ada and Ardmore. The main warehouse is in Ada. The warehouse in Ardmore is smaller than the warehouse in Ada, but it has a higher ceiling, which provides more vertical storage for commodities. There are well-equipped offices in the warehouse area (one is the warehouse manager's). In each warehouse, there is a large cooler that opens up to the store's refrigerated shelves.

Figure A-14. Ardmore FDP store

3. Distribution. The Chickasaw Nation FDP operates 3 stores, which are the program's primary food distribution method. The stores are set up like supermarkets. The first store opened in Ardmore in 1998—it was a "learning experience." In Ada, opening the store was a two- or three-phase process—the store opened in 2000. First, they added more warehouse space; then they turned the old warehouse into the store; then the old storage area was turned into administrative offices. The tribe paid for the renovations. The tribe opened the Purcell store in 2003. This is a smaller store.

In 2005, the Ardmore store was relocated using a $400,000 infrastructure grant from USDA to move the Ardmore store to a campus where an old boarding school was—it is close to other tribal programs. The old building was just a small metal building; it was still like a store, but had open cases rather than supermarket shelving. Now, it is a bright and very commercial-looking store. The WIC program is located in this building as well and there is a large open demonstration kitchen near the entrance to the building.

The Chickasaw Nation FDP's scanning system allows clients to come in to pick up items more than once a month. Focus group respondents were fairly evenly divided between those that went to the FDP store twice a month and those that went only once a month, depending largely on how far they have to travel to get to the store and whether they think they will be able to arrange transportation for more than one trip. Participants indicated that they did not come to the store more than twice per month because of the cost of gas.

The Chickasaw Nation's system tracks items by bar code, so the FDP has very specific information on what people are choosing. The Chickasaw IT department made up bar code labels for items that come in without bar codes (like fresh fruits and vegetables).

Before the FDP opened the first store, it had 16 tailgates per month. This was very hard on the staff with all of the loading and unloading, and clients had to wait outside in the heat and

cold. At first, the staff didn't like the store idea because they had to do the shelving. But since then, the staff has been very happy with the store approach. They improved the shelving from open cases to store shelving like a grocery store would have, and staff started to take pride in the display.

Staff and program managers feel that stores are much more convenient and provide more dignity in how clients are served. They also have more interaction with the clients this way—clients have a relationship with the staff working at the stores. The stores are closed the last two days of each month for training and inventory. "Everybody's having more fun with the storefront system." The FDP Manager reported that they started to see an increase in FDP participation when they opened the store—it does not have the stigma of everyone seeing you in line at the tailgate. At the same time, FNS started the commercial labeling, and this helped as well, because there was not the embarrassment of having friends over and seeing the generic labels. Focus group participants also said they preferred the store set-up. It was pointed out by focus group participants that some people stock up on commodities that they won't use. The store arrangement helps to encourage people to get only what they think they can use. In contrast, when the FDP had tailgates, participants received pre-packed boxes of food.

Figure A-15. Checkout at Ada FDP store

Store hours are: 8-5 in Purcell, Ardmore, and Ada, with the exception of 8-6 in Ada on Monday, and 8-6 in Ardmore on Tuesday. Staff take staggered lunch breaks so that the stores do not have to close in the middle of the day.

Tour of Ada Store. The store is bright and welcoming and looks very much like a small supermarket. There is a reception desk at the entrance along with a cooler of bottled water, free to all. Clients check in at the reception desk. FDP staff print out a sign-in sheet for participants to use. When participants come into the store they are given a "menu" or "shopping list" showing the available products and quantities by family size. There is a sign at the reception desk announcing new food items that will be coming in April. Signs posted in the store show the exchanges (e.g., number of cans of fruit or vegetables and the equivalent amounts of fresh produce).

The receptionist will go through FDP certification questions with new applicants as they come in. If they do not have all of their documents with them, they can get one month of food while their application is pending.

The store has a children's play area that includes a Big Bird 5-a-day poster and a 3-D food pyramid on display. The store is nicely decorated and bright. There is a large modern open kitchen with a hardwood floor right next to the store entrance. This is used for cooking demonstrations.

There are two check-out stations. Staff check clients out using a POS scanner. The system checks the quantity of food and gives an error message if the participant is over the allowed amount. Clients are asked to bring their own boxes in which to pack their groceries, although there are some extra boxes available. There is a covered drive-up area at the door right outside the checkout area where clients can load their groceries.

Tailgates Chickasaw FDP still does two tailgates monthly, in Marlow (85 miles to the west) and in Achille (85 miles to the south). If the tailgate time is not convenient, the participant can come to any store. Many come into the Ada store when they have a doctor's appointments in Ada.

4. Food Items. According to the FDP manager and program staff, the fresh fruit and vegetable program has been very successful. The success is attributed to a combination of participant preferences and educating clients about the value of fresh fruits and vegetables. The elderly still prefer canned meat, fruits, and vegetables, especially since they can stretch these farther and there is no concern about spoilage.

The FDP manager serves on the FDPIR Food Package Review Work Group, so she is aware of the product changes currently being implemented. These include removing SPAM-type lunch meats from the food package. The tribes asked FNS to make substitutions when items are removed from the food package, and this time FNS is doing that. (When they removed shortening, butter, and corn syrup, we were told, the products were just "yanked "with no replacements.) They will be getting frozen turkey ham, beef roast, and a better quality canned chicken. They will also be getting heat-treated low fat milk and fresh tomatoes. There are no variations in food products over the year except for the addition of ham in November (sometimes there is enough for December). Program staff expect that UHT milk will be popular—this is a new item that has been added.

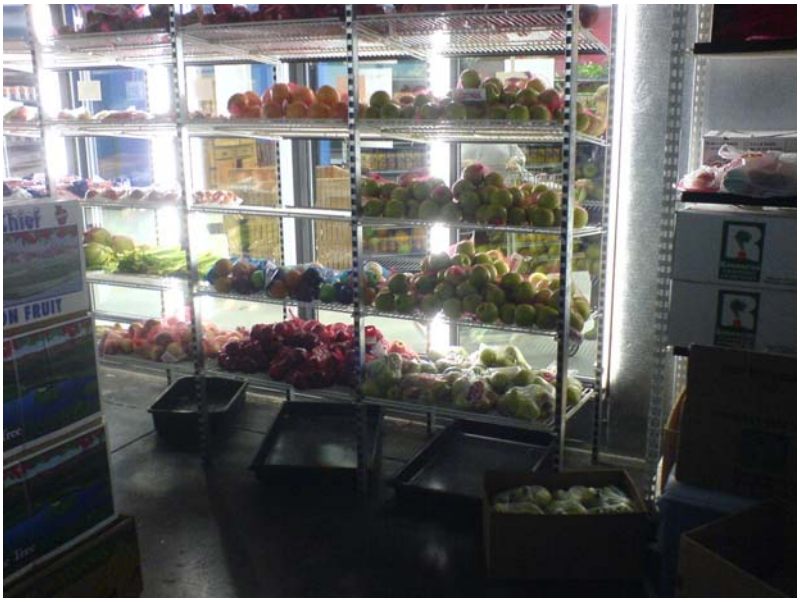

Figure A-16. Fresh fruits & vegetables in FDP store

The FDP manager reported that participants are asking for butter and syrup. They would like to be able to get the basics, such as eggs, milk, and sugar through FDP. But, clients seem to like what they have. The elimination of shortening mainly affected the elderly, as others were already using mostly oil. Participants are enthusiastic about the availability of fresh produce. In Ardmore, they get their fresh fruit and vegetable delivery each week on Tuesday, so if participants wait until Monday to come into the store, the store may be out of some fresh fruits

and vegetables. The fresh fruits were popular with participants in the focus groups. One focus group respondent said that with fresh fruits, her kids have changed their way of eating—if there is an apple in the house and not candy, kids will eat apples for a snack when they want something sweet. Participants also like being able to mix fresh and canned fruits from the commodities program.

FDP staff have found that labeling matters—they need to know from FNS what brands (not just what food items) are coming because it affects what goes off the shelves and how quickly. The brand label is what people take—the USDA generic labeled products sit on the shelf longer. In the store set-up, the labels are clearly visible and participants select items themselves, so you can really see what happens when people have the choice, between, for example, Del Monte and generic. Focus group respondents in Ada said they preferred commercial labels because then they know whose product it is. They also reported that expiration dates are clearly visible on commercial labels. Some respondents think the flavor is better with commercially labeled products; stigma is another reason mentioned for preferring commercial labels.

C. Nutritional Issues (and how they are addressed) and Native Foods

The Nutrition Services Director notes that, with respect to healthy eating, the tribe has not arrived yet, but she has seen the momentum in the last couple of years. Nutrition Services has influenced Head Start and Senior menus. Nutrition Services also helped revise the menu for the hospital cafeteria menu, which used to have a "bacon day." "It's a slow road—it will be another generation before change is evident." Anywhere Nutrition services can touch, they try to be part of the solution.

Figure A-17. Nutrition education/demonstration area in Ada

The tribe's SNAP-Ed/FSNE program (called Get Fresh!) tries to include traditional foods in the programming. The tribe just hired an ethnobotanist. They feel that there is a lot more they can do—they would like to be like the Native American Museum in Washington, D.C. with respect to promoting nutritious native foods. Because they are not reservation-based, it is harder to keep up the culture—it's basically a rural Oklahoma population. Wild berries are a traditional food.

The FDPIR Food Package Review Work Group, of which the Chickasaw Nation FDP manager is a member, has asked for quite a few native foods but has only received bison, which is not native in Oklahoma. Chickasaw clients like bison because it is leaner than ground beef, although venison and wild turkey are the native foods to the Chickasaw and the other Southeastern tribes that were removed to Oklahoma. Buffalo has been offered as a bonus item (not counted against the participant's FDP allotment for the month), but the availability of bison has been very unstable. The FDP manager and others suggested that USDA arrange for supplying native foods regionally, as there are so many different native foods depending on the part of the country in which a tribe is located.

The Nutrition Services Department also administers the Farmers' Market Nutrition program for seniors and WIC participants. This provides additional access to fresh produce. Breastfeeding promotion is "huge"—they have two licensed lactation consultants as well as counselors, but there is still a lot of "misinformation" about breastfeeding. The Chickasaw Nation WIC program pays for breastfeeding lounges in as many buildings as possible. The WIC program also loans breast pumps. Breastfeeding mothers that work in any of the Nutritional Services Department buildings can bring their babies to work.

Respondents reported that the FNS nutritionist in Oklahoma City is great at finding education resources for them. Nineteen tribes pool their nutrition education dollars together and they decide how to use them—the FNS nutritionist manages the dollars statewide.

Figure A-18. Simmer & Serve demonstration

Nutrition education at the Chickasaw Nation is provided through the SNAP-Ed/FSNE grant, which is primarily used for cooking demonstrations. Staff have two cooking shows a day, two days per week at all three facilities (Ada, Ardmore, and Purcell). They try to use commodities if possible for the cooking demonstrations. Classes are run in a series with themes or "tracks" and one track is focused on recipes using commodities. Nutrition education staff also have a program called, "simmer and serve," which introduces participants to new FDP food items. These are cooking demonstrations/tastings for anyone to observe and pick up the recipe when they come to the building.

The general consensus of staff and participants is that Get Fresh! demonstrations have changed behavior—they have generated interest in cooking healthy. A number of focus group participants said they are consuming less fat and doing more baking and broiling and less frying. A majority of the focus group participants had attended at least one cooking demonstration. They liked having the opportunity to sample recipes so that they could adjust seasonings to their taste when preparing them at home. Examples of demonstrations that they attended included one on how to cook bison and one on how to make your own cereal bars. The only negative mentioned about the classes was that it is hard to get to them if you are working.

D. SNAP/FSP

SNAP/FSP is a state-administered program under the Department of Human Services (DHS), and operates the same way in all counties. SNAP/FSP staff in the county offices are state employees. We interviewed staff at both the Pontotoc County and Carter County offices. The Pontotoc County office is located in Ada, which is also the location of the Chickasaw Nation tribal government headquarters. The Pontotoc County DHS office has a staff of about 17. Eight of these workers have primarily SNAP/FSP caseloads, but all workers handle SNAP/FSP. The Carter County office is located in Ardmore, just a short distance from the location of the Chickasaw Nation FDP and nutrition services building. The Carter County DHS office has a total staff of 27, organized into 4 supervisory and 4 school-based work groups. Of the total staff, 14 focus on the SNAP/FSP, Medicaid, and daycare programs; 6 focus on the ABAWD, old age, nursing, and adult daycare programs. The remaining professional staff focus on SSI/DI, school-based, and TANF programs.

A. Program Information

1. Mission. The DHS mission is "To help people in need help themselves in order to lead safer, healthier, more independent lives."

2. Client Population, Program Size, and Service Areas. SNAP/FSP caseloads in both of the county offices range from 280 – 300 per worker (this includes all SNAP/FSP participants, not just Native Americans). Pontotoc County DHS serves all of the county out of one office. It also serves a few outside of the county (less than 1% of the total client population) who work or go to school in the county. In November 2007, Pontotoc County served 5,288 SNAP/FSP recipients (2,318 cases), and about one-quarter of these recipients were American Indians. Respondents in Pontotoc County described their SNAP/FSP participants as mostly young and married (20-30 year-olds) with 2 or 3 children. The average household size of SNAP/FSP participants is four.

There is seasonal variation in SNAP/FSP participation. The Pontotoc County office had fewer SNAP/FSP participants in February than ever before. Respondents think the construction in their parking lot is part of the problem. There is more transience in the caseload after school ends in May because people wait until then to move. The Pontotoc County office gets an influx of university students in the fall because East Central University is located in Ada. Both Pontotoc and Carter County respondents reported increases in the number of SNAP/FSP participants in the summer and around the holidays. This was attributed to mothers staying home with their children

in the summer, resulting in lower family incomes, and to children spending more time at home when schools are not in regular session, making school-based food programs unavailable.

3. Eligibility and Outreach. SNAP/FSP eligibility follows the federal program guidelines. At this time, neither Pontotoc nor Carter County have exemptions from ABAWD work requirements so able bodied adults without children have to work and can only receive SNAP/FSP for 3 months. (ARRA later suspended the ABAWD restrictions until FY 2010.)

Applicants for SNAP/FSP and other programs are screened at the front desk (Oklahoma DHS has one application for all programs). SNAP/FSP intake workers give applicants "high" or "low" priority designations, or "pend" the eligibility determination because additional information is needed from the applicant. In emergency (expedited) cases, clients are seen the same day and get 30-day emergency certification. Many of these participants are also given referrals for emergency food.

Following the initial screening by the receptionist, applicants are asked to view interactive videos developed by the state. The videos describe the available programs, eligibility determination process, and information that applicants need to provide. The SNAP/FSP program staff were enthusiastic about these videos and said that participants seemed to like them too.

Eligibility determination is facilitated by an "intelligent" PC-based system developed by the State and appreciated by the workers. They have one application and one interview for all programs—this system has been in place for the last 10 years. An add-on to this statewide information system, called FACS (Family Assistance Client System), enables them to pull up cases from anywhere in the state. To expedite the eligibility process, workers will call an applicant's employer to get the necessary salary information. After a worker completes the application, a quality assurance review is conducted by a supervisor who classifies the determination as correct, questionable, or in error.

There is a one-year recertification period for SNAP/FSP participants. An individual with earned income is subject to Benefit Review Reporting (BRR) after participating in the SNAP/FSP for 6 months. BRR requires mail-in reporting of any changes in employment status or income, but does not require a face-to-face interview. Participants do not have to report changes in income before 6 months unless gross income is over the limit for SNAP/FSP eligibility.

For ABAWDs, eligibility is only certified for three months. Elderly participants are certified for 24 months, with a benefit review at 12 months.

This system (with mail in recertification at 6 months) has been in place for 5 years and staff have mixed feelings about it. Some staff would prefer to see households more than once per year as it provides more opportunity to get to know clients and assist them. These respondents think that if face-to-face certification was done more frequently, it would actually be less work in the end since it would require less follow up to get the required documents from participants. Others like the 6-month mail-in system because it can reduce workload and be more convenient for clients.

To determine the eligibility of Native American applicants, DHS staff said they have a list of Indian tribes that notes the types of income that can be counted.

SNAP/FSP participants can carry over benefits on their EBT cards for one year (participants receive a notice after 90 days of inactivity, but they can renew the benefits at this time).

Checking for Duplication of Benefits with FDP. The automated system used for eligibility determination/enrollment prompts a question about participation in the FDPIR. Special attention is given to the SNAP/FSP applicants who participate in TANF or general assistance operated by a tribe. When someone comes in to apply for the SNAP/FSP, if there is a Native American in the household, the DHS worker will call the Chickasaw Nation FDP—they know all of the staff there by name and vice versa. The Chickasaw Nation also calls DHS to check that an applicant is not enrolled in SNAP/FSP when applying for FDP. DHS wants to have a computer link to check FDP enrollment, but they do not have one—respondents at DHS indicated that the lack of a computer link is not a problem because the process works well by phone.

Eligibility workers have to check (by Social Security Number) every household member for FDP participation. For example, if parents are divorced, both could claim the child for benefits, so they have to check each person. They will refer clients who are not eligible for SNAP/FSP to FDP.

Participation in both programs at the same time does not happen very often—usually the DHS worker will close the SNAP/FSP case if the tribe calls and says the client wants to start receiving commodities; if a client is receiving commodities and wants to start receiving food stamps, the client can bring a statement from the FDP saying that he or she did not pick up their commodities that month. DHS staff write up an overpayment if the individual is enrolled in both programs—this is sent to the state office and the state determines how it is handled—they will send a letter to the client reducing their SNAP/FSP amount if the household is still enrolled in the SNAP/FSP. DHS staff reported that they work very well with the tribe.

SNAP/FSP Fraud. Persons suspected of fraud are referred to the Oklahoma State Inspector General. The DHS respondents indicated that some participants fraudulently permit others to use their electronic benefit (EBT) card (generally in exchange for currency or drugs). The informants suggested such fraudulent use could be mitigated by including a photograph of the participant on the EBT card. Another type of fraud mentioned was "intra-household mis-expenditures." Such mis-expenditures take place when a household includes both SNAP/FSP participants and others—when SNAP/FSP funds are used by those not participating in the program.

Outreach. The DHS respondents in Carter County said that the SNAP/FSP is well-known by most county residents and that little outreach is conducted. However, DHS does have county medical outreach workers and school-based social workers who do SNAP/FSP outreach along with their other duties. They inform individuals and parents/parent surrogates about the SNAP/FSP and other programs. Pontotoc County also gives out SNAP/FSP information at the free clinic. SNAP/FSP applications are available on the Internet and at the Social Security Administration office, but respondents said that few applicants use the Internet to apply for benefits. Carter County staff reported that there are no special efforts made to recruit Native American individuals or families. In Pontotoc County, there is outreach designed specifically to target Native Americans. DHS staff also speak to community groups. The Chickasaw Nation-

operated Carl Albert Indian Health Facility is close to the Pontotoc County DHS office—they share the same parking lot.

County DHS staff report that there are no barriers to SNAP/FSP access. They conduct home visits if someone cannot get to the DHS office for an interview, or participants can name an authorized representative to go to the DHS office on their behalf. They try to meet the needs of everyone who needs SNAP/FSP; staff will stay late for working people on a case-by-case basis. They arrange this individually because when they had general extended hours hardly anyone came.

4. State or County Administered. The Food Stamp Program is state-administered in Oklahoma, under the Department of Human Services.

B. Nutritional Issues

DHS has a contract with Oklahoma State University (OSU) extension service for a nutrition educator home visiting program. Information about this program is included with the initial screening forms provided to applicants and a referral to the OSU nutrition education program is built into the intake software used by the County DHS offices. Other than the OSU program, the respondents indicated that there is little nutrition education associated with the SNAP/FSP. Unlike their Pontotoc County counterparts, Carter County workers reported no interaction with nutrition education programs offered by the Chickasaw Nation—they were aware of such nutrition education only from articles printed in local newspapers.

At the Pontotoc County DHS, Chickasaw Nation calendars listing food demonstrations are available in the intake area and by the front desk. The Chickasaw Get Fresh! program had some demonstrations at the DHS auditorium for SNAP/FSP staff to make DHS staff aware of the program and get them to refer people to Get Fresh! for nutrition education. Pontotoc County DHS staff also noted that the Chickasaw Nation has done a lot to help with diabetic diet issues, including recipes and education.

Respondents at DHS county offices said there are several programs that provide food security to people in the community, including the church-based programs Loaves and Fishes; House of Prayer (which serve only persons/families participating in SNAP/FSP), and Angel Food. Angel Food is administered by local churches—for $30 per month an individual can purchase groceries valued at about $100 value. SNAP/FSP benefits can be used to pay for Angel Food groceries. Other food security programs mentioned include Big Five, Feed the Children, and the Salvation Army. While the respondents were aware of these programs, they did not indicate that they regularly refer SNAP/FSP participants (or others) to them.

E. Program Coordination, Participation and Cycling

A. Coordination Between FDPIR and SNAP/FSP

Unlike Pontotoc County workers, those in Carter County said they do not discuss or refer Native American applicants/participants to FDPs. Nevertheless, respondents said that many of their Native American clients have experience with FDP, but prefer SNAP/FSP because of the greater choice in food selection. In Pontotoc County, there is a community council meeting

monthly that all agencies attend. Native American employees of the state are involved and help in program coordination. For example, the Chickasaw Nation has assumed coordination of events, such as the children's fair that this council organized in previous years, which resulted in an increase in participation from 100 to 1,800 children. DHS respondents stated that the Governor of the Chickasaw Nation is very supportive—he wants the tribe to be involved in the community.

B. Coordination between FDPIR, SNAP/FSP, and Other Programs

The Chickasaw Nation's SNAP-Ed/FSNE grant funds programs for FDP and SNAP/FSP participants or eligibles. Others can attend as well, but do not receive incentive items if they are over the income limits for the programs. Most who attend are income-eligible. DVDs of the cooking shows are available and the nutrition education staff would like to be able to televise the cooking shows at the Ardmore campus. In addition to cooking demonstrations, the Nutrition Services staff have the "simmer and serve" program where they hand out samples and recipes.

The FDP, Get Fresh! (SNAP/FSP nutrition education), and WIC are all in the same building in Ardmore, so they coordinate closely. Also, their nutrition education is provided through the Head Start Program, and there is a summer food program that FDP works with.

There is also a wellness initiative for nutrition services staff. The staff are learning about new software that can be used to track diet and activity. WIC is starting a "word of mouth" grassroots campaign, called "Mommy and Me" to promote healthy eating and activity and may use the wellness initiative software for this.

The nutrition services staff also organize fun walks with the community and health fairs.

1. WIC. Since WIC is under the Chickasaw Nation Health System in the Nutrition Services Department, it is organizationally under the same direction as FDP, so they work together on nutrition and healthy lifestyle issues as well as technology. The Chickasaw Nation operates seven WIC clinics in seven counties; two are co-located with FDP. In Ada, the WIC clinic is located in the family practice building at the hospital; the other four WIC clinics are stand-alone. In Ardmore, where WIC and FDP are co-located, both WIC and FDP participants attend food demonstrations and can pick up recipes and nutrition education materials. WIC clients can get WIC nutrition education credit for attending the Get Fresh! classes. In addition to the classes conducted in the Ada Nutrition services building, the Get Fresh! program has also conducted classes at the WIC clinic. WIC also shares staff with FDP—where programs are co-located, they have staff that are 50 percent WIC and 50 percent FDP and the receptionist knows both programs. Referrals are made between WIC and FDP in both directions. WIC tracks referrals to FDP because it is part of their reporting requirements (this is included in the SPIRIT system), but FDP does not track referrals to WIC.

The Chickasaw Nation WIC program is revamping its interviews and nutrition education to be more relevant—using emotion-based language to talk to mothers and find out what they want to know. Participants can sign up for Momcircle.net to participate in phone discussions. This activity includes FDP staff and is facilitated by a contractor.

WIC issues food prescriptions (paper checks) and participants use them at grocery stores. Program staff are hoping to go to WIC EBT soon. The Chickasaw Nation took the lead in organizing the SPIRIT Consortium (Special Partners in Reaching Innovative Technologies) and hosts the system. This is a consortium of 12 tribes in the Southwest. The new WIC system is the first of three model state agency systems—this system does client management, certification, and benefits issuance. The Chickasaw Nation has hosted Arkansas, Missouri, and Montana to come and look at the SPIRIT system. It was built with larger state agencies in mind, so respondents felt that it would definitely work for them.

2. Farmers' Market Program—Seniors and WIC. The farmers' market program for WIC participants and seniors is directed by one staff member and is part of the Chickasaw Nation's Nutrition Services Department. The WIC Farmers' Market program (funded by USDA) provides $30 total in checks May-September for each eligible family member, including children 6 months of age or older (e.g., a breastfeeding mom with a 3-year-old would receive $60 of coupons for the period May-September). Participants receive coupon booklets of 6 coupons for $5 each. They take these to vendors at participating markets or farm stands for fresh fruits and vegetables.

Last year was the first time the program for the elderly was an official USDA program—prior to this it had been a pilot program. Income guidelines for the senior farmers' market program are the same as for WIC (185 percent of poverty). The farmers' market program for the seniors provides $50 per eligible person (Native American and age 55 and older) in the household May-September. Non-Native Americans 60 or older can participate as long as they reside in a Native American household. Examples are:

- Living with Native American spouse
- Living with Native American children
- Living with Native American grandchildren
- Living with Native American niece/nephew

Individuals under age 55 with disabilities are also eligible if they live in a Native American household. Chickasaw seniors receive an additional $50 per person provided by the tribe to purchase fresh unprocessed fruits and vegetables.

For both programs, the coupons can only be used at markets contracted with the program and at farm stands. Last year, $230,000 of coupons were issued for the two programs combined—this money all goes directly to local farmers. The farmers' market program has a small in-house information system. It contracts with a bank for the checks (coupons) and receives a report from the bank on redemptions.

Seniors have much higher redemption rates than WIC participants, and a possible explanation offered is that WIC participants are not used to farmers' markets. Younger people are not used to having to pay cash or to get up early to shop. The program does survey farmers' market participants to learn whether they have tried a new fruit or vegetable or a new way to prepare a fruit or vegetable. They also ask how often participants visited a farmers' market and whether they used additional cash at the farmers' market (beyond their coupons). The program manager's impression was that participants do eat fresh fruits and vegetables throughout the

summer; local farmers report that revenues have increased and say that they have had to plant more and different things to respond to demand.

The farmers' market program is coordinated with all of the programs under the Chickasaw Nation Nutrition Services. It helps participation in the farmers' market program when fresh fruits and vegetables are used in the recipes and cooking demonstrations—clients get to taste the foods and this makes them more willing to try new foods and recipes. All farmers' market program recipients receive nutrition education. During the summer, the WIC program has lessons that focus on fresh fruits and vegetables. Also, when they get their coupons, participants receive a nutrition education pamphlet. Seniors receive their coupons in the mail and nutrition education pamphlets are included with the coupons. Seniors are also sent a calendar every December with recipes. The centers in Ada, Ardmore, and Purcell display fresh fruits and vegetables in the summer months to remind people to shop at farmers' markets. The cooking demonstrations offered by Get Fresh! target essentially the same population that participates in farmers' market programs; Get Fresh! uses the fresh fruits and vegetables available in FDP and at farmers' markets for cooking demonstrations in the summer. Sometimes Get Fresh! will have demonstrations at the markets using available foods.

C. Factors Affecting FSP/FDP Program Participation and Cycling

While some FDP respondents said they had little knowledge about cycling between the SNAP/FSP and FDP, others noted that, at the end of the school year, clients switch from commodities to SNAP/FSP so that parents and children can prepare convenience foods when the children are not attending school. Then, clients tend to switch back to FDP in the fall. Some participants switch every 3 months. Although participation fluctuates, staff were expecting to see an increase in FDP participation in response to the increased cost of gasoline and groceries.

Some staff respondents feel that there is less stigma associated with FDP than with SNAP/FSP, especially for those who live in a small community. Also, you "feel less like a number" in the FDP program. Nutrition services staff are generally of the opinion that FDP has an advantage over SNAP/FSP—the foods available are healthier, participants receive nutrition education at stores, and it is closely coordinated with other Chickasaw Nation programs.

Focus group respondents pointed out that a single person does not get enough on SNAP /FSP. Several participants on Social Security said that they only got $10 per month on SNAP/FSP. They can get more food on commodities. One person said that SNAP/FSP referred her to commodities because she was only eligible for $10 a month on SNAP/FSP. The consensus of all respondents, regardless of family size, was that they got less on SNAP/FSP. "We like Chickasaw programs and there's much more food on commodities." "FDP offers better food for a large family and it lasts all month." Respondents did report occasionally switching to SNAP/FSP when they wanted easy to prepare foods, but also noted that with SNAP/FSP "it's too easy to eat junk food and overbuy."

Respondents also said that FDP is not as "nosy" as SNAP/FSP—SNAP/FSP asks about vehicles, bills, bank accounts, child support, etc. Several focus group participants spontaneously expressed disapproval of fraud by some SNAP/FSP program participants. Some people choose SNAP/FSP because they sell SNAP/FSP benefits for cash and use the cash for drugs. This

doesn't happen as much with commodities, but it was noted that some people will even sell the cheese that they receive from FDP. SNAP/FSP is also a problem if one person in a household purchases food on an EBT card without the permission of a spouse.

VI. Overall Assessment and Suggestions by Respondents

Respondents uniformly feel the FDP program is doing really well. They say it really took off when they went to the store method—participants don't have to stand in line (especially in bad weather) or wait at a truck. Getting commodities at store sites is also faster. It never takes more than 20-30 minutes to get items and get check out.

One suggestion made by staff was the need for more flexibility on the part of USDA with respect to substituting of products, especially in providing fresh fruits and vegetables.

Nutrition services staff were positive about USDA's efforts with respect to commercial labels. The commercial labels reduce stigma because clients feel that people who come to their homes can't tell they are on assistance. Most focus group participants preferred commercial labels to generic brands, but some said that they thought with commercially labeled brands, you are paying for the brand name. The overall consensus was that "while it's nice to have more attractive labels, the most important thing is the taste."

On the issue of nutritional value of FDP compared to SNAP/FSP, one staff member said it would be good if USDA had a way to know what people were buying at the supermarket with food stamps, given that staff are concerned that SNAP/FSP participants buy a lot of "convenience foods" (e.g., microwaveables) and "junk foods" ("like Little Debbies"). The problem is that this type of food doesn't last as long and then there is not enough food for the household later in the month.

With respect to products, staff suggested that USDA add some kinds of convenience foods that are healthy, such as microwave popcorn and trail mix (staff noted that they had trail mix once as a bonus item and it was very good).

Participants generally feel that FDP meets their nutritional needs. Participants in one focus group agreed that they "love" the food on commodities, especially the meat, cheese, and "veggies." Respondents were particularly enthusiastic about the fresh fruit and said their children like it. Things they buy on their own to supplement commodity foods include: garlic, peppers, spices, and green onions.

Focus group participants said they would like to get fresh milk, eggs, bread, and bananas on FDP, since they are able to get all of the other staple items on FDP. Participants also said they would like to get bison more—several prefer ground bison to hamburger and say it is easier to digest because it is leaner. It was also noted that it would be good to have lactose-free milk since lactose intolerance is common among Native Americans. Other suggestions were for more choices/variety of cheese and breakfast foods. They also commented on the lack of spices, sugar, fresh garlic, and chili peppers. Participants also liked the butter, which is not available anymore.

The participants also shared some “tips” on how to improve some of the FDP foods. For example, the powdered eggs are improved if made with some cheese, and the powdered milk is improved by making it in advance, adding some evaporated milk, and refrigerating it overnight.

In addition to the product suggestions above, when asked what they would change about FDP, focus group participants said they would like to have a larger quantity of meat in the commodity food package, especially for single person households. They would also like more opportunities for group discussion to share tips and recipes for using commodity foods.

When asked what they would change about SNAP/FSP, focus group participants said they would increase the SNAP/FSP benefit amount for single person households and individuals receiving SSI. They were concerned that the SNAP/FSP is not taking care of elders.

Southwest Region Site Report

Choctaw Nation

Research Staff: Nancy Pindus and Walter Hillabrant

I. Introduction

Research staff spent one day (Thursday, March 20, 2008) visiting the Durant, Oklahoma site of the Choctaw Nation Food Distribution Program (FDP) as part of the Southwest region FDP site visit. The Choctaw Nation of Oklahoma consists of ten and one-half counties in the southeastern part of Oklahoma. The Choctaw Nation is bounded on the east by the State of Arkansas, on the south by the Red River, and on the north by the South Canadian, Canadian, and Arkansas Rivers. The western boundary generally follows a line slightly west of Durant, then due north to the South Canadian River (see Figure A-19 on next page). At the Choctaw Nation, we interviewed the FDP Director and toured the facility in Durant. We also interviewed two supervisors and two caseworkers at the Bryan County Food Stamp program office.

II. Tribal and State Context

The Choctaw Nation in Southeastern Oklahoma operates several successful casinos and other enterprises. Choctaw Nation does not distribute per capita payments to tribal members. A major focus of the Choctaw Nation's programs is education. Casino profits are used to provide reimbursement for college classes, continuing education, and scholarships. The tribe has also built several wellness centers and is building more. Respondents indicated that the economy was doing well in this part of Oklahoma. Administratively, FDP is part of the tribe's social services department, which includes other nutrition and income support programs.

III. FDP

B. Program Information

1. Mission. The intent of the FDP is to supplement the food purchased by low-income families—it is not designed to provide all of a family's food needs. Nevertheless, program staff.

believe that the FDP is the main source of food for many participants

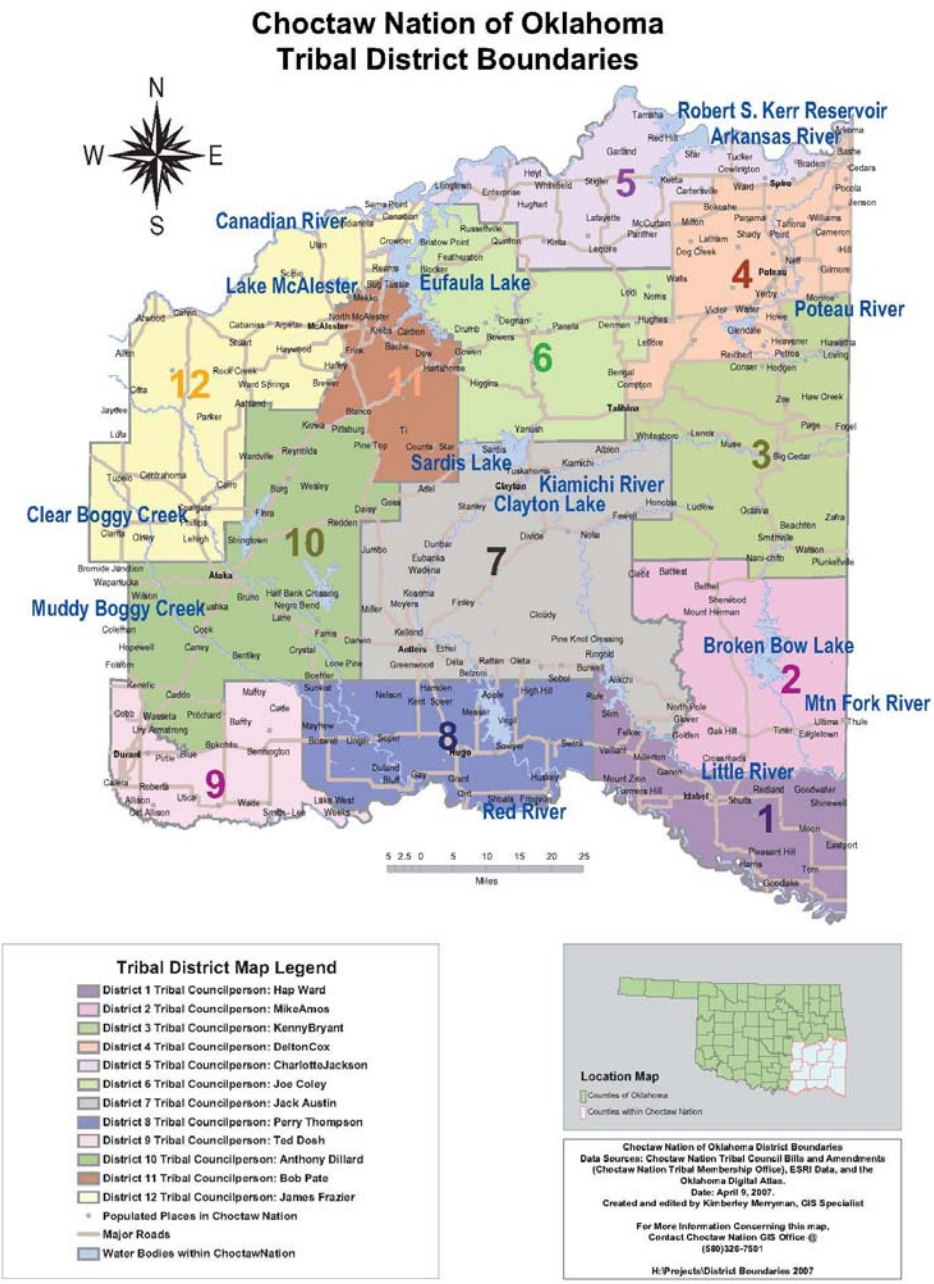

Figure A-19 Choctaw Nation Map

2. Client Population, Program Size, and Service Area. The Choctaw FDP employs 21 staff. The program serves 10 ½ counties where 150,000 tribal members reside (includes non-enrolled

persons living in tribal members' households). The half county is a county that is divided between the Chickasaw and Choctaw Nations.

The client population is a mix of elders and low-income families. On average, the FDP serves approximately 2,000 families per month, but this varies by season and month. For example, the program had a total of 3,812 participants in February 2008. Of those enrolled, about 200 do not show up to receive commodities every month. It is not clear why these families fail to pick up their food. Eligible families are free to pick up their commodities or not—there is no penalty for missing one or more pick ups.

Over the last 7 years, there has been a decrease in the number of FDP participants. At one time, 5,000 families participated in the program. According to FDP staff, this decrease may reflect an improving local economy. Fewer mothers are staying home cooking; instead, they are working. Another reason cited for the decrease in FDP participation was "competition" from SNAP/FSP.

3. Eligibility/Certification. Participants can be certified for one month, or up to 12 months for the elderly. Potential program participants can be certified at any program location. If they have all of the required documents, they can be certified and pick up food on the same day. Participants must pick up their commodities at the same location where they were certified. The program is working on an inter-area system that will enable participants to transfer from one location to another.

Program staff check for participation in the SNAP/FSP as part of the certification process. The Oklahoma Department of Human Services (DHS) sends each tribe a large notebook containing a listing of SNAP/FSP participants sorted by county, tribe, and Social Security Number. FDP staff refer to this notebook to verify that an applicant is not participating in SNAP/FSP. This notebook is updated monthly, so if they need more up-to-date information, program staff call the SNAP/FSP office to confirm that the FDP applicant is not a current food stamp beneficiary. If they learn the applicant is enrolled in SNAP/FSP, the FDP staff explain to the need for a termination letter from the SNAP/FSP office to receive FDP benefits that month. FDP benefits can only be distributed if the applicant did not already receive SNAP/FSP benefits for that month. If they have already received that month's SNAP/FSP benefits, they will have to wait until the following month to enroll in FDP.

FDP also provides DHS with a monthly list of FDP participants. In the past, DHS has processed overpayments, recovering funds for dual enrollment cases. FDP staff indicated that "the word got around about this" and as a result, dual enrollment is now rare. The FDP Director would like to have a data sharing agreement between Choctaw Nation and DHS, so that FDP staff could check the income, number of household members, and SNAP/FSP participation of FDP applicants electronically.

B. Program Operations and Services

1. Outreach and Access. Outreach for FDP is conducted primarily by the nutritionist, who shares recipes and conducts demonstrations on how to prepare healthy foods at stores, distribution sites, and health fairs. In addition to the outreach conducted by the nutritionist, the

program places advertisements in the tribal newspaper and posts information on the tribal website.

2. Inventory System and Warehouse. The Choctaw FDP has a total of four warehouses, including the main warehouse in Antlers, along with warehouses in Durant, McAlester, and Poteau. Commodities are delivered to the main warehouse in Antlers. There can be ten to twelve a month depending on what food was ordered and what food was available.

Storage space is a problem at the warehouses in Durant, McAlester, and Poteau, so trucks pick up food at the main warehouse and deliver it to the others about twice per month. Fresh produce is delivered to the four warehouses weekly. Orders are made using the USDA-provided automated system.

Figure A=20. Warehouse

3. Distribution. The Choctaw Nation FDP program distributes food at "stores," where participants select and pick up foods from open shelving as in a supermarket; at warehouses; and at tailgate sites. FDP staff report that the store model has received a positive response from customers. Since the stores opened, there has been an increase in the number of people who want to enroll in the FDP. In addition, some participants who used to pick up their commodities from other distribution sites, now go to the stores. On the other hand, opening stores seemed to decrease participation in tailgates. We visited the warehouse/distribution site in Durant, which had a warehouse area with the required freezers and refrigerators, a check-in area, and a pick up area. Store locations are Antlers (store and main warehouse), Durant, McAlester, and Poteau.

At the Durant distribution center, there are three truck drivers and two certification clerks. A customer who arrives at the distribution center first checks in with the certification clerk and picks up a "shopping list" based on family size. The check-in area has a small children's play area as well as nutrition information on posters and pamphlets. Participants indicate the items they want to pick up on the shopping list. Staff enter this information into the computer and print out a list for warehouse staff to use to assemble the order. Participants then drive around to the back of the building where there is a pick up area. Program staff efficiently collect and box the selected items (participants are asked to bring their own boxes for pick up). Staff are friendly and helpful when filling customer orders. While there was no child-friendly area at the pick up site, we observed a large order organized and provided to a customer within five minutes and the customer's children were able to participate in conveying food boxes from the warehouse to the family vehicle.

The program continues to operate "tailgate" distributions at remote community buildings and a Family Investment Center. These sites are located in Bethel, Idabel, Stigler, Brokenbow,

and Smithville. The FDP at one time distributed commodities at 19 tailgate sites, but the number was reduced when the store model was implemented. FDP staff are able to schedule two tailgate pick up sites in one day. These tailgates allow clients who are unable to travel to the stores and warehouse sites to participate in the commodity distribution program.

The Choctaw program does not provide home delivery services. Elderly or disabled clients are brought to the stores by bus transportation provided by the tribe. Through a state-funded program, FDP staff can cook, help clean the homes, and assist in picking-up commodities for elderly and/or disabled individuals. In addition, Community Health Representatives (CHRs) can provide transportation and accompany elderly and/or disabled clients to the stores operated by the program.

4. Food Items. Staff reported that the fresh fruit and vegetable program has been very successful due to a combination of participant preferences and educating clients about the value of fresh fruits and vegetables. However, it was noted that the elderly still prefer canned meat, fruits, and vegetables because these can be stretched further throughout the month with no concerns about spoilage.

There are no variations in food over the year except that the program receives hams in November (sometimes there is enough for December).

FDP staff indicated that the customers like commercial labeling when it is visually appealing. Customers feel that commercial labels are an indicator of the quality of the food. Commercial labels are especially appreciated in the storefront model where open shelves are used.

C. Nutritional Issues (and how they are addressed) and Native Foods

Nutrition education is provided by a certified nutritionist who started with the FDP in June of 2007. This is the first time the Choctaw FDP program has had a nutritionist. She is paid out of the FDP budget. Although it has been difficult to find money in the budget for this, for purposes of continuity, the FDP Director preferred this to applying for a Food Stamp Nutrition Education grant, since there is no assurance that such a grant would continue each year. The nutritionist conducts cooking demonstrations at the FDP stores.

Generally, few native foods are available through the FDP and they do not seem to be of great interest to Choctaw FDP participants. Bonus items include cranberry sauce, turkey, and bison. The FDP food committee has requested that a number of native foods be included in the FDP food package (for example, hominy), but none of these requests have been granted. As mentioned previously, the program has received bison as a bonus item, but bison is not native in Oklahoma. Staff suggested that the USDA arrange for the provision of native foods regionally, as native foods vary by the region in which tribes are located.

IV. SNAP/FSP

A. Program Information

1. Mission. The DHS mission is to "help people in need help themselves in order to lead safer, healthier, more independent lives."

2. Client Population, Program Size, and Service Areas. The SNAP/FSP service population includes low-income households, disabled persons, children, and seniors. Nearly all of the individuals who receive food stamps from the Bryan County Human Services office reside in Bryan County, with the exception of a few individuals who reside near the county and request to receive services from the Bryan County office rather than the county in which they reside. The SNAP/FSP caseload increases during the summer; in the past, the caseload used to increase around Christmas time as well. The respondents attributed the increased caseload during the summer to the fact that children in eligible families do not receive breakfast or lunch at school (through the USDA school meal programs) during this time. The SNAP/FSP staff that we spoke with were unable to estimate the proportion of their SNAP/FSP caseload that is Native American.

The Bryant County DHS office has 2 supervisors who oversee 10 caseworkers each. On average, each worker has 315 cases. For a number of years, applicants for the SNAP/FSP and other programs have been assigned to a single caseworker (as opposed to individual clients having different caseworkers for different programs). This combined caseload approach allows caseworkers to develop an in-depth understanding of a client's circumstances and needs. However, the informants said that this benefit has been weakened, to a degree, by relatively high staff turnover at the county office. Respondents indicated that some higher paying industries have located in this area, so it is harder to attract and keep caseworkers.

3. Eligibility Determination. Typically, a new client interview takes between 60 and 90 minutes. Repeat interviews of current clients are often completed within 30 minutes. Applicants have 10 days to bring in required information, such as evidence of income and relevant expenses. Staff then have 30 days to make the eligibility determination.

Prior to the final eligibility determination, SNAP/FSP applicants are given an EBT card and PIN. The informants indicated that they very much like the computer system developed by the state, which they use for intake interviews and eligibility determinations. While awaiting the initial intake interview, applicants are encouraged to view a 10 minute video describing the SNAP/FSP. When the applicants receive their EBT card, they are invited to watch a 20 minute video. The informants indicated that these videos are very popular with program participants.

Eligibility is determined by a combined (for all assistance programs) and comprehensive process. When a potential client applies for food stamps, an initial screening is conducted to determine if this client is eligible for emergency services. Clients eligible for emergency services are seen the same day. One or two caseworkers are designated as "floaters" each day to see emergency cases. Program staff have up to seven days to certify eligibility for emergency cases—if some information is missing, staff can make a provisional determination that lasts for 30 days, giving time for clients to provide additional documentation. Other applicants receive a

scheduled appointment for a certification interview and return at that time. Clients mostly come into the office to obtain and fill out applications rather than printing them from the web. Almost all of these determinations are done at county offices; however, the social security office can also accept food stamp applications. There is only one SNAP/FSP office in Bryan County. Special accommodations are available for potential beneficiaries who are unable to go to the county office.

Reporting and Recertification. There is a one-year recertification period for SNAP/FSP participants. A household with earned income is subject to Benefit Review Reporting (BRR) after participating in the SNAP/FSP for six months. BRR requires mail-in reporting of any changes in employment status or income, but does not require a face-to-face interview. Participants do not have to report changes in income before six months unless income is over the limit for SNAP/FSP eligibility.

For ABAWDs, eligibility is only determined for three month periods. Bryan County does not have an exemption for high unemployment because there are jobs available in this county. Elderly persons are certified for 24 months, with benefit reviews scheduled after 12 months. When certified, clients are told the income thresholds under which they qualify for benefits, and they are required to report if their incomes exceed these thresholds.

Checking for Duplication of Benefits with FDP. As part of the initial eligibility determination, applicants who have checked the Native American race/ethnicity box are asked if they participate in the FDP. In the event of uncertainty, the SNAP/FSP interviewer will call the Choctaw FDP staff and the tribe will provide a list of FDP participants. The informants indicated that SNAP/FSP staff have good relationships with the FDP. One caseworker noted that there has been a huge change in people claiming Native American heritage—the tribe has been encouraging this—and as a result, there is more pride than stigma now. Not all have their CDIB[32] cards because some had ancestors that were too proud to enroll in the tribe. One caseworker says she has had only one case in the past two years where someone was enrolled in both programs (FDP and SNAP/FSP). In cases of dual enrollment, overpayments are processed so that benefits in any given month are only received from one program.

SNAP/FSP Fraud. The informants reported that some individuals apply for and obtain food stamps primarily to fraudulently obtain cash in exchange for use of their benefits card. They believe that substance abuse (i.e., addicted individuals needing cash to pay for drugs; we were told that methamphetamine use is a problem in this area) is the primary cause for such fraudulent activities. For example, someone might say, "I have $100 on my card so come into the store with me." It is a debit card, so if the participant purchases something and then returns it right away, they will get cash back. Such instances of fraud were said to be rare, but when they do occur they are referred to the state inspector general. For example, one woman had her case removed for one year due to fraud, but her children were allowed to continue receiving food stamp benefits.

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[32] Certificate of Degree of Indian Blood, issued by the Bureau of Indian Affairs (BIA) or, with BIA approval, by the tribe.

Outreach. Outreach is conducted through public service announcements on the radio (provided by the state), at churches, and by school-based social service workers.

4. State or County Administered. The SNAP/FSP is administered by the Oklahoma Department of Human Services using staff (state employees) located at county offices.

B. Nutritional Issues.

The respondents indicated that nutrition education consists of the dissemination of USDA calendars and pamphlets distributed to program participants. In addition, as part of the comprehensive application procedures, applicants are offered the opportunity to participate in nutrition education activities offered by an extension program of Oklahoma State University (OSU). This OSU program includes budgeting and nutrition education services.

Food Sources other than SNAP/FSP. There are a variety of food distribution and other nutrition programs available in Durant and other communities in the county. Two of these programs are *Loaves and Fishes*, which operates a food bank, and *Angel Food*, both of which are operated by churches. Angel Food provides participants each month with a pre-packaged box with more than $25 worth of food which can be paid for with the SNAP/FSP EBT card. Another program is *Families Feeding Families*, which provides hot meals and a food pantry in schools. The respondents were not certain, but they believe that some of the food in the Families Feeding Families program comes from the USDA. A final program mentioned by the informants was *Feed the Children*, which is a DHS-Sponsored statewide food distribution initiative for needy individuals and families who do not qualify for the SNAP/FSP.

V. Program Coordination, Participation and Cycling

A. Coordination Between FDPIR and SNAP/FSP

As discussed in the section on eligibility, to ensure that applicants are not currently enrolled in the SNAP/FSP, FDP staff either consult directly with SNAP/FSP stamps staff by telephone or use the notebook distributed by the SNAP/FSP. Other than at intake when the programs may make contact with each other to prevent dual enrollment, there is little interaction between the two programs.

Caseworkers at the Bryan County DHS say that Native Americans can get more assistance through the tribe, so they often refer people there. The tribe has many programs that are more generous than those of DHS, including assistance with housing, heat and other utility costs, and healthcare. Caseworkers say the Choctaw Nation is a great resource to the community.

B. Coordination between FDPIR, SNAP/FSP, and Other Programs

The FDP refers clients to WIC, Head Start, social services, and the diabetes/wellness center. Persons eligible for commodities are automatically eligible for benefits through WIC and the National School Lunch Program, so the FDP often refers clients to these programs. The wellness center is well attended and represents a significant investment by the tribe in the health,

nutrition, and well-being of its members and families. The wellness center is free to anyone with a CDIB card. The FDP nutritionist provides recipes at the wellness center.

FDP participants, especially the elderly, also participate in the farmers' market program offered in the summer. This program is co-funded by the USDA (75%) and by the tribe (25%). Tribal members whose income is above the eligibility level for either SNAP/FSP or the FDP may participate in local community programs such as the church-based Families Feeding Families.

C. Factors Affecting Program Participation and Cycling

The FDP staff suggested several factors that seem to affect switching between the food stamp and commodities programs. Some commodity participants stock up on basic commodities while participating in the FDP program over several months. Subsequently, these participants switch to food stamps in order to get higher quality meat and other desirable foods generally unavailable in the FDP.

Some participants in the FDP switch to receiving benefits through the SNAP/FSP during the summer when their children are on vacation from school because, with SNAP/FSP, they can purchase foods that are easy to prepare; for example, foods that can be microwaved. Some of the foods available in the commodities program require greater effort in cooking and preparation.

The informants also cited the intrusiveness of the eligibility determination interview required by the SNAP/FSP as well as the more stringent limitations on income and assets as factors that lead some Native American individuals and families to elect to use the FDP. Also, many seniors only qualified for the $10 minimum monthly SNAP/FSP benefit, which has since been raised.

According to the DHS supervisors and caseworkers, the most common explanation for their choice given by SNAP/FSP participants is probably the greater choice and food selection available under that program. In addition, some participants indicated that they like the ability to obtain prepared foods that are available with food stamps. Some SNAP/FSP participants said things like, "my kids won't eat their [FDP] food," and "I can't get soda pop and candy for my grandkids," and "I have to cook when I get commodities."

The county DHS respondents indicated that there was little switching between the SNAP/FSP and FDP among their clients.

VI. Overall Assessment and Suggestions by Respondents

Overall, the FDP staff's assessment of the program and of customer satisfaction was positive. Specific requests were made for the addition of a greater variety of foods and healthy "convenience foods," such as microwave popcorn and trail mix (they had this once as a bonus item and it was very good).

Staff reported that many program participants had "real heartburn" over the removal of butter and shortening from the commodities package. Some of these clients went to the tribal council complaining about the removal of these commodities.

The FDP staff feel that the income guidelines for the FDP and the SNAP/FSP are too restrictive, especially for single individuals, as the guidelines have not kept up with the increasing cost of living. The cost of living measure that is used may no longer be appropriate, and this may be a contributing factor to the decrease in participation in the FDP.

Western Region Site Report

Sherwood Valley Rancheria

Research Staff: Walter Hillabrant and Diane Levy

I. Introduction

The research staff spent three days (Monday August 18, 2008 through Wednesday, August 20, 2008) at the Sherwood Valley Rancheria site visit. The Sherwood Valley Rancheria is located in Willits, California, 24 miles north of Ukiah, the Mendocino County seat, and 137 miles north of San Francisco. The Sherwood Valley Rancheria FDPIR serves a consortium of 23 Rancherias/reservations and tribes located in five counties (Mendocino, Sonoma, Lake, Glenn, and Colusa).

While at the Rancheria, we conducted a focus group with 11 of the program participants and conducted two formal interviews. At these interviews we included the FDPIR Director and the Warehouse Manager who provided a tour of the warehouse. Additionally, we met with the Tribal Administrator and two other program staff, whom we accompanied at two "tailgate" distribution sites served by Sherwood Valley—Manchester/Point Arena and Willows, California. At Manchester/Point Arena, we briefly interviewed the Vice Chairman of the Manchester/Point Arena Rancheria. At Willows, we interviewed the Community Health Director, the Nutritionist in the Health Department, and the Substance Program Manager of Northern Valley Indian Health, Inc. which hosts the tailgate distribution. We also conducted a focus group with six FDPIR participants at the Willows site.

The site visit also included interviews with two Mendocino County SNAP/FSP administrators, the Deputy Director, Employment & Family Assistance Services and the Division Program Manager; both in the Division of the Mendocino County HHS Agency, Social Services Branch at their offices in Ukiah, California.

The Sherwood Valley Rancheria FDPIR started in the 1990s. There are nine full-time employees. The Director has held the position for 1.5 years, and the Warehouse Manager has worked there for over 13 years. Other staff include two drivers, two warehouse employees, two certifiers, and a program assistant. After funding in the past year has increased, a program assistant and a second driver have been hired. A USDA study of the funding method that examined programs' region size and number of customers led to the increase.

The original program site was located in rented space in an industrial park at the county seat, Ukiah. Once the decision was made to purchase a site, the Rancheria purchased a parcel next to "trust land" where the tribal office/community center, casino, and residential housing are located.

II. Tribal and State Context

A. Tribal Background

The operation of the Sherwood Valley FDPIR is best understood in the context of history after California became a state in 1850. The Sherwood Valley Pomo Indians, like those of most Indian Rancherias in California, have experienced tremendous challenges. Between 1851 and 1852, 18 treaties were negotiated between the United States and more than 100 California Indian Tribes and Bands. The treaties called for reservations of more than eight million acres for the tribes. However, the US Senate failed to ratify the treaties. In the early 1900s, the unratified treaties were discovered and reformers petitioned Congress to appropriate money to provide land for the homeless Native Americans of California. Congress appropriated the money to purchase 9,000 acres of land that, in time, became 50 separate Rancherias.

Originally, the small pieces of land or "ranches" were not intended to be reservations for separate tribal governments; rather they were to provide housing for homeless and landless adult Indians. Despite these obstacles, many of the Rancherias, as they came to be called, successfully petitioned for federal recognition.

In 1953, the *California Rancheria Act* called for the termination of federal trusteeship for Indians in California. During this period, 38 tribes were "terminated" in California. In 1973, the *Indian Self Determination and Education Act* allowed tribes and Rancherias to regain federal recognition. In 1979, Indian residents from some Rancherias joined in a class action lawsuit to restore the reservation status of their land, asserting that their trust relationship had been illegally terminated under the *California Rancheria Act*. Seventeen Rancherias terminated pursuant to administrative action under the *California Rancheria Act* were restored to federal recognition by virtue of the settlement of the litigation. Another 10 Rancherias subsequently were restored pursuant to settlements in other similar federal court litigation. Today 104 tribes are recognized in California with the majority being Rancherias.[33]

Efforts to terminate/eliminate them reverberate in the relations between Sherwood Valley (and the other Rancherias that its food distribution program serves) and the State of California, its counties, and the United States. Sometimes these relations can be strained by apprehension and mistrust.

Federal recognition, termination, and re-recognition has influenced the location of the Sherwood Valley Tribal and FDPIR headquarters. Currently, the FDPIR building is located next to tribal trust land where the tribal headquarters, housing complex, and casino are located. Prior to obtaining Native American Housing Assistance and Self Determination Act (NAHASDA) funding to construct the tribal housing complex, there were only about three Sherwood Pomo families in Willits. The availability of tribal housing drew Pomo families back to the area from

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33 http://www.aaanativearts.com/california_rancherias.htm;http://www.gratonrancheria.com/news092906_6.htm

Figure A-21. SVFDPIR Headquarters Exterior

Ukiah, Sacramento, and elsewhere. The houses created a community for tribal members/Diaspora and made the location of the FDPIR at its present site feasible.

B. Tribal Economy

The Tribe operates the small, moderately successful "Black Bart Casino" on its tribal lands. Tribal members receive "per capita" payments of casino profits of approximately $500/month with payments to minors placed in a trust. Some focus group participants said they thought the FDPIR income guidelines should be increased so that receipt of per capita payments does not make an individual or family ineligible for the FDPIR. Nevertheless all agreed that FDPIR income guidelines are better than those of the SNAP/FSP. Outside of the casino and federally-supported tribal programs (e.g., housing, FDPIR, health) at the Rancheria, there are few employment opportunities. Most tribal members work at Willits and other nearby towns.

III. Sherwood Valley FDPIR

A. Program Information.

1. Mission. The program's mission is to provide supplemental food to native people living on Indian reservations/Rancherias, many of which are located in remote, rural locations where it is difficult to complete the requirements for SNAP/FSP and to use that program's benefits.

2. Client Population. The Sherwood Valley Rancheria FDPIR serves 23 Rancherias/reservations and tribes located in five counties (Mendocino, Sonoma, Lake, Glenn, and Colusa):

- Big Valley
- Cloverdale
- Colusa Rancheria
- Cortina Rancheria
- Coyote Valley
- Dry Creek.
- Elem Nation
- Grindstone Rancheria
- Guidiville Reservation
- Hopland Reservation
- Laytonville Rancheria
- Lytton
- Manchester-Point Arena Rancheria

- Middletown Rancheria
- Pinoleville Rancheria
- Potter Valley Rancheria
- Redwood Valley Rancheria
- Robinson Rancheria
- Round Valley Reservation
- Scotts Valley Rancheria
- Sherwood Valley Rancheria
- Stewart Point
- Upper Lake Rancheria

Participants include eligible persons who are:

- Elderly with fixed income who cannot afford to buy adequate food, many of whom reside on the reservation;
- Families with children (the majority of customers);
- Tribal members who are apprehensive about dealing with non-Indian institutions and officials and prefer to interact with culturally compatible tribal organizations, some of whom are reluctant to apply for SNAP/FSP benefits;
- Working-poor families.

The majority (about two-thirds) of the participants work but have incomes that are insufficient to meet their basic needs. The remaining one-third receive public assistance or are retired. Some participants have received commodities since the program started in the 1990s but others no longer qualify because of job and income advancement. As has been observed at other study sites, the director said that older people cook but younger people who lack cooking skills and experience tend not to participate in the program because many commodities (e.g., dried beans, flour, meats) require cooking. Few tribal members grow their own food or raise livestock. Those who do live in the very rural areas.

Figure A-22. Map showing 19 tailgate locations

3. Program Size and Service Area. The Sherwood Valley FDPIR is one of the largest in the country, both in area and number of persons served. On average the program serves over 900 households (over 3,000 beneficiaries located on the 23 participating Rancherias). Over the last five years program enrollment has been increasing. When the warehouse was located at Ukiah, about 3,000 participants were served. While the actual number of current participants was unavailable, the director indicated that more than 3,000 are being served.

The program serves a vast five-county area, delivering to 19 sites a month, some of which are located over four hours from the main office/warehouse. Mendocino County, one of the five counties served by the program, is roughly the size of Rhode Island. Consequently, the "tailgate" component is critical to the success of the program. It maintains three large trucks with refrigerated areas, has two truck drivers on staff, makes monthly deliveries on most days of the month, and has associated high gasoline and vehicle maintenance costs. A calendar in the program office displays the 19 tailgate deliveries scheduled for the month and a large map shows the location of each site. Many of the roads used are small and twisting making deliveries especially challenging in the winter.

The service area is defined to include areas "on or near" the reservations served, which is defined broadly as the entire county within which the reservation/Rancheria is located. In Mendocino County, Santa Rosa and Ukiah, two cities with populations over 10,000, received waivers because of the land-based issues with California tribes (e.g., lack of reservation lands).

Interestingly, members of the focus group at the Willits site said that the FDPIR should not be restricted to particular areas; American Indians should qualify for the program regardless of the location.

4. Eligibility. Eligibility requirements include: tribal enrollment (if living outside reservation or rancheria boundaries), income requirements by household size, residence in the service area, and receiving neither SSI nor SNAP/FSP. Individuals interested in participating in FDPIR must fill out an application. Either the FDPIR director or one of her staff interviews the applicant, verifies the individual's identity with an ID, and checks paystubs to verify monthly income.

Figure A-23. Posted dual enrollment warnings

The program prints the list of clients each month (names, social security numbers, pick-up location) and mails it to the social services office in each of the five county service area for comparison. If a person is found on both lists, s/he is taken off the FDPIR (and SNAP/FSP) program rolls right away. If FDPIR receives a letter from SNAP/FSP saying the person is no longer enrolled in SNAP/FSP, s/he can enroll in FDPIR again.

The certification period varies, depending on the stability of the employment situation. For example, if a person has held the same job for many years with little likeliness of a change, the Program usually certifies him/her for 9 months. If the client has a temporary job, certification

may be for only 3 months, depending on the family's situation. The program certifies a client for a period of 1 year or less—the maximum one year period is used only for clients with a fixed income. When participants place their monthly food orders, the staff ask whether anything has changed with the household's financial situation.

California is a "cash-out" state—SSI recipients cannot receive food stamp or commodity benefits because the monthly SSI payment includes an amount for food. The food portion of the payment ranges from $5-$40. People who receive as little as $5 in food benefit from SSI cannot enroll in FDPIR (the program office has displays warning clients and potential clients of this prohibition). Informants said this is a big problem for poor individuals and households in remote areas and suggested a waiver for dual participation status for households where income does not exceed the program's income limit.

Focus group participants said fraud does occur in the program. As an example participants said that in mixed households, if the Indian member moves, the non-Indian members continue to "collect from the FDPIR." Another example was given where a young participant says that he/she is picking up for an elder, but is actually keeping the commodities.

B. Program Operations.

Figure A-24. Checking refrigeration on truck

1. Outreach/Access. When the Sherwood Valley FDPIR program was developing in the 1990s, staff conducted outreach. Currently, tribal members learn about it by word of mouth. It is clear that Sherwood Valley and the other Rancherias served make great efforts to make the program accessible to eligible individuals/households. For example, the organization that hosts the Willows site, Northern Valley Indian Health, Inc. (NVIHI), has expended significant human and other resources to make the tailgate work effectively and efficiently at its site.[34] Before coming to NVIHI, the tailgate was conducted at Colusa Rancheria parking area. The Tribe asked the FDPIR to change the delivery site because many program participants came from nearby, non-Colusa communities. NVIHI, a large and busy healthcare facility, made space available for new and continuing FDPIR participants to sign up for the program, to place their orders, and to pick up the ordered

[34] NVIHI is operated by a consortia of rancherias from three counties: Grindstone Indian Rancheria (Glenn County), Mechoopda Tribe of Chico Rancheria (Butte County), and the Paskenta Band of Nomlaki Indians (Tehama County)

commodities. Schedules were developed in cooperation with the FDPIR so that participants were comfortable, did not have to wait unnecessarily, and ensured that patient care was not compromised. The NVIHI Community Health Director said that it was challenging at first to make the necessary accommodations, but coordination with the FDPIR and other programs serving Indians is central to NVIHI's mission.

Tailgate delivery is a critical component of the Sherwood Valley FDPIR. The program has three large trucks, two of which do all of the deliveries to the other participating Rancherias and tribes. Generally, a truck has a crew of three: a driver who also helps to fill orders, a second person who helps to fill orders, and the third person who takes orders and enrolls new participants using a laptop computer.

Figure A-25. Sherwood Valley FDPIR Warehouse

2. Warehouse. The warehouse is large (10,000 square feet) and clean. The building previously was a metal parts fabrication facility; it has been totally renovated to serve as an FDPIR warehouse. It has two large walk-in freezers (maintained at 0^0F for meats and other frozen foods) and a large cooler (20 x 20 feet) for fresh vegetables and cheese (maintained at 40^0F). Next to the warehouse, the building has a small kitchen area with a refrigerator, microwave, and sink, used primarily by program staff.

After the initial renovation, the facility has been upgraded. An example of a needed upgrade is that the asphalt surface of a parking lot did not work for the forklifts used in loading and unloading trucks. The parking lot now has a cement surface with painted stripes designating parking areas. In addition, flowers have been planted to improve the attractiveness of the facility. The warehouse manager indicated that general maintenance is ongoing in the warehouse. He indicated that his current needs include an improved loading dock which would greatly increase the efficiency of loading and unloading commodities.

3. Ordering and Receiving. The program conducts an inventory the last two days of each month. This inventory includes an exact count of the commodities in three program trucks, the warehouse, and the issue line. Based on the results of the inventory, the warehouse manager who has worked in the program for 13 years (starting as a warehouse aide, then as a truck driver, and now as the warehouse manager) estimates the commodities to be ordered.

The Director or another certifier places an order each month for commodities using the ECOS (Electronic Commodity Ordering System) and Automated Inventory System (AIS) systems.

The orders go directly to the Kansas City processing center. Within 10 minutes, a confirmation of receipt is received via ECOS. Once the orders are placed they can be modified up to 5 working days before the scheduled delivery date. Should the warehouse run short of a commodity, the staff send what is on hand to distant tailgate sites; it is easier for program

participants residing in Willits, "locals," to come into the warehouse to pick up newly arriving replacement commodities.

Paris Brothers of Kansas City has been the delivery company for canned and dry goods. The Department of Defense, Defense Supply Center Philadelphia, the FNS contractor for the Fresh Produce Program, made a change in the company delivering fresh produce in the three weeks before we visited, switching to a company based in Sacramento. This company hadn't been as reliable so far—they originally tried to deliver produce to Hoopa, Crescent City, and Willits in one day, "not realizing that it's not possible." They are on a learning curve regarding the delivery challenges in such a vast, mountainous, remote area. With the previous delivery company, the program could order twice a week, but now it only can order once a week. If the program runs out of certain items, clients who have yet to pick up their commodities for the month will not receive any of those items.

4. Food Items. Both the director and focus group participants indicated that participants very much like the fresh produce (e.g., potatoes, apples, celery, bell peppers, onions, oranges, carrots, cabbage). She is selective when ordering produce, generally avoiding highly perishable items, such as cucumbers or peaches. On the other hand, the director said participants "all flipped out" about no longer getting butter and the lack of an alternative. As a result, many participants "buy the cheapest product they can find at the store, which will be unhealthy, worse than butter."

The program offers turkey ham, roast beef, and chicken, but not bison even though participants want it. In general, there is little emphasis on Native foods and, apart from fresh fruits and vegetables, there is little seasonal variation in the commodities available. The program has received bison in the past but funds have not been appropriated for this purpose since FY 2006. The director said that participants do want bison even though it is not a traditional food for the Rancherias.

Focus group participants indicated that they want the following commodities: butter, milk , frozen or fresh bison, pineapple, roast beef, and ham. (1% UHT milk, frozen beef roasts, and turkey ham have been added to the FDPIR package since our visit; pork hams are offered in November and December.) Others said they would like greater variation of cheese and that they wanted canned chicken (added since our visit), pork, and pink salmon. There was an almost unanimous consensus approving the fresh vegetables and fruits that are available, saying they are healthier and that are liked and eaten by their children. Parents were especially appreciative of the fact that their children have either reduced the amount of junk foods they eat or are not eating them at all.

Some criticized the macaroni and cheese that is currently available—they said it is "gloppy," and others dislike the new canned tuna. Some focus group participants said they want more soup choices. There was a consensus among focus group participants that taste is more important than labels, although others said they dislike all common labels. The director said that for the most part, products still have generic labels although some items are commercially labeled. She thinks the label issue is "silly," and that the money could be better spent by USDA.

5. Distribution. Most clients can pick up their commodities once a month at the warehouse or tailgate site; however, at some tailgate sites many participants receive two deliveries per month. By appointment tailgate clients can pick up their commodities at their tailgate site or at other tailgate sites if they cannot get to their own. However, some tribes do not like to have people from other areas come to their tailgate site. Clients from tailgate sites also can pick up commodities at the warehouse should that be easier on occasion. Local Sherwood Valley clients can go to the warehouse to pick up their commodities. The warehouse is open Monday through Friday from 8 a.m. to 5 p.m. except for the last two days of each month when the inventory is conducted. If local (Sherwood Valley) participants are unable to receive their full allocation at one time because some items are "sold out", they can come back again within the same month, but only to pick up items not issued previously. The allotted amount remains the same.

The program now has three trucks with refrigerated compartments allowing delivery of frozen and fresh produce items. These trucks depart on a daily basis to make deliveries to the participating tribes/Rancherias. Most participants pick up commodities at the 19 tailgate sites once a month. Tailgate sites have specific times, usually for 2 or 3 hours; the Colusa site (NVIH) is a particularly large one, so the pick-up hours are longer than usual.

Vehicular access to the tailgate sites varies considerably. For example, the road to the Manchester/Pt. Arena site is hilly and narrow. For seasons other than winter, access is not difficult but in winter, access can be very difficult. Still, participants there were very pleased that the tailgate is relatively close to their residences.

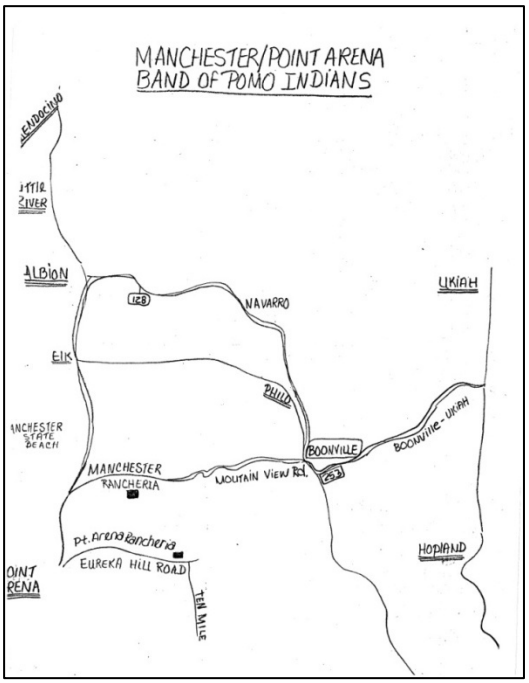

Figure A-26. Map Warehouse to Pt. Arena tailgate site

Using a laptop computer, a staff person walks through the ordering process with each customer placing orders each month. The customer's order is printed out at the computer and given to other staff to fill. Customers order a month's worth of food and the order is collected, boxed, and available within minutes.

Focus group participants had nothing bad to say about the program's distribution. They said that the distribution is a good part of the program, even when the warehouse was located in Ukiah. Some mention that picking up commodities either in the warehouse or at the tailgate can be a positive family activity with all members participating, and a chance to visit with people they otherwise would rarely see. Nevertheless, while saying that the FDPIR staff working at tailgates are really good, some focus group participants said that additional help is needed to assist program participants in loading the commodities into their cars.

Distribution at the two sites visited (Manchester/Point Arena and Willows) is described below.

Manchester/Point Arena Tailgate. The Point Arena site is 75 miles southwest of the Sherwood Valley Warehouse in Willits, about a two-hour drive. Three Sherwood Valley FDPIR staff traveled to the site—one works with participants inside taking and printing orders and the other two fill orders at the truck. The tailgate was set up at the Manchester Rancheria community center which is attached to its health care facility. The delivery truck was positioned in the parking lot so that cars could easily back up to it.

One staff person sat at a table in the main room where he set up a laptop and printer to take and print each participant's order. He also could update records and sign up new clients—applicants do not have to make the long trip to the main office in Willits to enroll. During the tailgate observed, one participant who had failed to place an order for 6 months appeared. The system had removed him from active status so he was re-enrolled in the program. Some of the clients picked up orders for others who were unable to make the trip to the tailgate site. The FDPIR staff checked to ensure that the order was, in fact, picked up for an eligible, active participant.

Figure A-27. Winchester-Pt. Arena tailgate site

FDPIR staff estimate how much of each item to bring to the tailgate sites. Because orders are taken on site, sometimes there are insufficient supplies on the truck if an unexpected number of participants request a particular item.

There were chairs in the room that accommodated a handful of people at a time, and a staff person from the community center prepared coffee. On another table, FDPIR staff set out free books for children, recipes and other nutrition information for clients.

The town of Point Arena has a small grocery store; Gualala, 15 miles away has two grocery stores and Ft. Bragg, 60 miles to the north, has a number of stores, including a Safeway supermarket as well as an SNAP/FSP office. However, many of the participants lack reliable means of transportation to these towns and thus, are dependent on the FDPIR.

Willows Tailgate. The tailgate takes place at the Northern Valley Indian Health, Inc. (NVIHI) site, a "one-stop service [center] for health care, food security, and housing assistance" located in Willows, CA, in the northern portion of the Sacramento Valley. NVIHI is governed by a Board of Directors from the Northern California Tribes of Grindstone Indian Rancheria (Glenn County), Mechoopda Tribe of Chico Rancheria (Butte County), and the Paskenta Band of Nomlaki Indians (Tehama County). We interviewed the NVIHI Community Health Director, the Nutritionist, and the Substance Abuse Program Manager; conducted a focus group with FDPIR participants; and observed the distribution process at the Willows site.

The city of Willows has a population of 6,000, about three percent of which is native. It is the county seat of Glenn County which has a population of 27,000. The area is transient and

racially/ethnically diverse, with white, Hmong, Hispanic, and native residents as well as Hispanic migrants.

Figure A-28. Taking order at Willows tailgate

At the site, the FDPIR truck has a designated position at the side of the building that allows cars to drive up from one side, collect their commodities, and then drive out of the parking lot, all without blocking the main area of the health center's parking lot. FDPIR gets to use a nice-sized all-purpose room in the center on tailgate days. Similar to the arrangement at Point Arena, a staffer sets up the laptop computer and a printer at a table to complete the commodity form with clients and to enroll or update clients' information.

The center provides a staff person to assist. A nutritionist from the medical department of the center also prepares a dish each time with commodity foods, provides copies of the recipe along with nutrition information, and provides a handout she prepared on the nutritional elements of commodity foods.

FDPIR participants picking up commodities are asked to come at an appointed time so that the distribution activities inside the facility (applying for program enrollment, placing an order) can be conducted in the designated room and the flow of people controlled so as not to disrupt health care providers, patients, and others. Elders are generally scheduled to arrive first and then others throughout the day. Food and nutrition information is offered in that same room. The center asks FDPIR participants to proceed to the assigned room as scheduled rather than using the patient waiting room. While people are at the center, they can meet with the WIC staff, if appropriate, or receive medical care or participate in other health and lifestyle services.

As with the Manchester/Point Arena Tailgate, the participant takes the printed order to the truck where other members of the team fill the order. While the order is being filled, the participant moves his/her car from a parking space to a position near the tailgate of the truck. With help, as needed, from the staff, the participant loads boxes into his/her car and, thus, the process is completed.

Willows FDPIR Participants. The Community Health Director said that FDPIR participants who use the Willows tailgate site reside in or near Willows. There is another tailgate site in the county at the Grindstone Indian Rancheria, a more rural site.

Program Coordination. The NVIHI is a model of program coordination and cooperation. It has been able to blend and/or coordinate funding from multiple sources (e.g., USDA, FEMA, MediCal, Chico State University) using the orientation—"with the community, not for the community."

Many of the NVIHI clients also receive commodities. The NVIHI staff tell clients about the FDPIR and are actively involved in nutrition education as part of their health promotion/disease prevention activities. The NVIHI center offers WIC, a substance abuse prevention/treatment program that includes the community garden, dental health, physical health,

behavioral health, diabetes talking circle, Medi-Cal (Medicaid) application assistance, transportation to specialty appointments, flu shots, and assistance with college applications. However, the center does not interface with the SNAP/FSP as the county SNAP/FSP office handles that program. The center receives unsold foods from stores and the food pantry for distribution, sends people to the food pantry, and provides FEMA emergency food vouchers via the United Way. The center contracts with a pharmacy located across the street, making it convenient for health care patients to take care of most of their health needs in one area.

Figure A-29. Community garden at Willows site

The NVIHI Community Health Division also offers health education and exercise programs, most of which take place in community settings rather than at the center. They incorporate play in many of their activities for adults as well as for children. For example, they offer "Grindstone Play Days" on the Grindstone Rancheria. This involves physical activities with children and youth, nutrition education, much of which is carried out through games and fun activities, healthy treats for all participants, and giveaways, such as backpacks and school supplies.

The Community Health Division also offers the Working on Wellness (WOW) program that was developed by the Sault St. Marie tribe in Michigan. This change-oriented program is targeted to adults. Participants work in small groups and learn about the steps of change. They keep journals and support each other within the team as well as offer support to other teams. The goal is to get people to move one stage along the change scale per WOW session.

The Community Health Division is "positioned to work with the community rather than for them." It follows the asset-based model of community development. This division of NVIHI predominantly serves the Indian community on purpose; staff target the limited resources. This differs from the health clients on the medical side of the center, the majority of whom are non-Native Medi-Cal recipients.

Notwithstanding the manifold services provided by NVIHI, some focus group participants said that some of the staff can be "snotty—they give kids a hard time when they act up; instead they should get them involved in an educational DVD."

A. Nutritional Issues (and how they are addressed) and Native Foods

Nutrition-related offerings have included providing recipes and diabetes information, working with tribal health staff in offering cooking and nutrition demonstrations, and sponsoring a commodity cook-off (competitions involving cooking with commodities) at "Big Time" (similar to Powwows at other tribes). Many customers take print materials from the program headquarters/warehouse (and from tailgate sites). About 15-20 people usually participate in the cooking demonstrations, which cover commodity foods to use in recipes and tips for what to do with them. Nevertheless, focus group participants said that they want more cooking

demonstrations and more information on nutrition. Of special interest was information on the preparation of meals that meet the needs of Indian children, elders, and diabetics.

At the Willows tailgate site there is a community garden that is considered part of the substance abuse treatment and nutrition programs. Food is distributed to elders and families with children.

The Program helps fund the "Cahto Coast Walk" and offers nutrition education as part of the event. The walk is based on the traditional practice of gathering food at the coast, tying this cultural practice and pride with nutrition and health.

Nutrition education is provided to participants and other tribal members at the Sherwood Valley tribal headquarters building, which has a full size kitchen. At the start of the focus group meeting at the Willits site, the Program Director demonstrated preparation of fruit smoothies, blending ice, powdered milk, and canned fruits available in the commodities. An even more sophisticated nutrition education program is in place at the NVIHI tailgate at the Willows site. There a nutritionist prepares wholesome dishes for the FDPIR participants using commodities and makes menus and nutritional information available.

A "*My Pyramid*" food diagram, other nutrition education, and health promotion information is posted at the Sherwood Valley and Point Arena sites and even more is available at the Willows site.

IV. Mendocino County SNAP/FSP

The site visit included interviews with two Mendocino County SNAP/FSP administrators at their offices in Ukiah, CA: the Deputy Director, Employment & Family Assistance Services and the Division Program Manager, both in the Division of the Mendocino County Health and Human Services Agency, Social Services Branch.

SNAP/FSP is administered at the county level following state regulations. The program's mission is to have healthy members of the community and to ensure that nobody goes hungry. The goal is to serve as many people as possible. Staff gave us a handout titled, "Vision, Mission, Value-Based Operating Principles (VBOPs)" that sets out the same for the HHS Agency as a whole. While the State of California is experiencing a major budget crisis, the informants said that good planning by county fiscal staff has so far insulated the SNAP/FSP from the crisis.

A. SNAP/FSP Organization. Ukiah is the largest city and the seat of Mendocino County. The SNAP/FSP offers full service from this main location. The office in Ft. Bragg, on the coast, is also a full service facility, administering TANF (known as CalWorks in California). SNAP/FSP staff in the county office in Willits can print EBT cards but cannot do intake. There are 13 Rancherias/reservations in the county.

SNAP/FSP Program size and Client Population. At the time of the site visit, there were 3,184 active SNAP/FSP recipients in the county—SNAP/FSP recipients that are considered non-assisted (households not receiving CalWorks). Additionally, of the 1,082 CalWorks recipients, approximately 90 percent (975) receive food stamps. The total number of cases comes to about

4,160. Staff said there has been an increase in SNAP/FSP recipients, and they attribute this increase to the poor economy.

SNAP/FSP recipients include working families, single adults, and homeless persons. There are many Hispanic clients. About ten percent of the client base has self-identified as Native American. Self-identification is done at the household level rather than individual level; the applicant can only choose one ethnicity. There are approximately 13 Rancherias/reservations in the SNAP/FSP county service area. There are few elderly clients. Staff thought that elderly do not apply because they lack knowledge about the program, are unaware of program guidelines, or "they don't want welfare."

SNAP/FSP Eligibility/Client Flow Process. The County Human Services Programs utilize several information systems and are in the process of consolidating them into a new system developed by the state. Existing systems include 1) Interim Statewide Automated Welfare System (ISAWS) which includes SAWS, the program developed for use by all state social service agencies; 2) LEADER, the system used in Los Angeles, and 3) CalWin, the system used in Sacramento. These systems do not integrate well which makes it difficult to integrate and coordinate social services and to meet federal and state reporting requirements. In March 2010 agencies here will change to a new information system, C4. Approximately 34 counties in the state will be on C4.

California is the only state that continues to uses the SSI "cash out" structure, in which elderly and disabled persons who receive SSI and SSP (Supplemental Security Program) are ineligible to receive food stamps. Staff explained the cash out as follows: recipients of SSI and SSP receive additional money that is supposed to represent the food stamp value (though they acknowledged the additional amount might not be equivalent to the value of food stamps).A client who receives SSI alone could still apply for food stamps. Staff can see in a person's record whether an SSI recipient also receives SSP. According to County Human Services staff, though it is technically possible for an elderly or disabled person to receive SSI but not SSP, it is unlikely. The FDPIR director has not come across an elderly or disabled SSI recipient who did not also receive SSP.

On the general application form, applicants identify which programs they want to enroll in. The SNAP/FSP office cannot pre-screen applicants—anyone can apply, even someone who it appears will not be eligible, because there could be exceptions to the guidelines. Also, there is a provision for application for expedited food stamps. If approved, applicants can receive benefits in about three days. If facing an emergency, staff try to get an applicant benefits more quickly.

Participants are required to report quarterly and recertify annually. The quarterly reporting can take place by mail but annual recertification must be done in-person. Reports must include proof of income, any drug felonies, expected income for the subsequent three months, and changes in employment, household composition, or resources (e.g., buying or selling an automobile), and household composition.

Clients can request a hardship waiver that allows all interactions to be done by mail. Hardships can include being handicapped or caring for a handicapped person, residing in a remote rural area, having transportation difficulties, caring for a child, or having a job that makes

travel to a county facility impractical. The waiver is good for 4-8 months. This option started last year and most of the hardship requests come from households residing in rural locations far from county facilities.

B. SNAP/FSP Outreach/Access. There is considerable marketing and outreach of the SNAP/FSP including brochures, public service announcements, etc. In addition, the county offices frequently play a DVD on nutrition in waiting rooms. The program will get new materials in October. None of the outreach efforts target Native Americans in particular. Examples of brochures found in the lobby include "Food Stamps help put healthy food on your table", "Los Cupones para Alimentos ayudan a poner comida saludable en su mesa," and a recipe card with English on one side and Spanish on the other.

The program "Healthy Kids Mendocino," supported by a grant from the Ukiah Natural Foods grocery store, will provide cooking demonstrations in the lobby beginning in September.

C. Coordination between FDPIR and SNAP/FSP. The relationship between SNAP/FSP and FDPIR extends no further than sharing lists of program participants. SNAP/FSP receives an automated monthly report from the Sherwood Valley FDPIR. SNAP/FSP benefits staff check the report for any dual enrollments. If they find someone enrolled in both programs, a social worker investigates and, if simultaneous enrollment in both programs is substantiated, the person will be removed from the SNAP/FSP. If a person is found guilty of fraud, s/he will be ineligible for food stamps for some period of time, depending on the specifics of the case. The social service staff interviewed said that they believe that there is occasional fraudulent use of benefits—a participant may sell his/her EBT card and pin number for cash. Such fraud is discouraged by federal investigations and by anonymous tips from concerned citizens.

Staff interviewed did mention that at the general intake, they ask applicants (for social services programs) if they participate in the FDPIR. A negative response can trigger a referral, but Social Services does not advertise the FDPIR program. The county staff said that they believe that FDPIR staff could do a better job in posting warnings against dual enrollment.

SNAP/FSP Coordination with Other Programs. A church sets up a food distribution site in the parking lot by the county office every Sunday. Anyone who shows up can receive food. There was a notice for this distribution posted on the outside window of the entrance to the county offices. As needed, county staff refer clients to the local food bank and a community dinner program run by Ploughshares. Ploughshares, similar to the church program, serves anyone who is in need.

D. General SNAP/FSP Comments. When asked what they would change about SNAP/FSP if they could, staff first said the quarterly reporting process—this process is seen as complicated for both clients and workers. They would simplify the requirements and advocated cutting the frequency to twice a year. Another change suggested would be to align reporting requirements across programs; at present most programs have independent requirements. Finally, they would separate the ability to change benefits from the reporting timeframe so that benefits could be increased should a client lose income between reports.

V. Program Coordination, Participation, and Cycling

A. Coordination among FDPIR, SNAP/FSP, and Other Programs. The Sherwood Valley FDPIR works closely with a variety of programs operated by the other Rancherias it serves. When needed, Community Health Representatives (CHRs) provide transportation to the warehouse and tailgate sites or make home deliveries, but this is rare due to limited manpower. Two CHRs stationed at the tribal headquarters building in Willits offer transportation to doctor appointments, home health and community health care, provide screening for health problems, and monitor health conditions of tribal members in addition to helping disabled participants to obtain commodities.

There is an education center in the tribal headquarters building that has computers, books, and other educational materials targeted to children and youth; an environmental program; and the *Red Road Program*, a culture-based substance abuse program. Housing programs are offered through the tribal consortium.

As indicated in the section on program eligibility above, each month the program prints and mails the list of clients to each social services office in the five county service area for comparison. The County office informs the Tribe and customer if dual participation is discovered. The customer can then either choose to be on commodities or SNAP/FSP. Both the FDPIR Program Director and staff at Mendocino County SNAP/FSP indicate that such dual enrollments are rare. If the FDPIR office receives a letter from SNAP/FSP indicating that the former client is no longer enrolled in that program, he or she can enroll in FDPIR again.

The SNAP/FSP application has a question asking whether the applicant currently receives or has ever received food assistance. If the answer is yes, the eligibility worker has to verify that it has ended. If the participant currently or formerly received benefits from FDPIR, the worker will call Sherwood Valley Rancheria to verify that the person is no longer participating.

B. Factors Affecting Program Participation/Cycling. Focus group participants said that the main reasons they choose FDPIR include: the convenience of the program (location, less bureaucracy, and no need to shop at distant markets), the greater quantity of food they receive compared to SNAP/FSP (especially for the working poor), their acceptance and appreciation of the staples that are available, and their comfort with the program—they are used to it and it is viewed as part of the community. Participation in the FDPIR is accepted; there is no stigma attached to it.

Focus group participants said that while the requirements are similar for the two programs, enrollment in FDPIR is easier because less paperwork is involved. The FDPIR Director said that it is especially difficult for persons with little formal education and few resources to satisfy the SNAP/FSP documentation requirements. SNAP/FSP can make sense in areas like Willits that have grocery stores or for people who can get to Ukiah where there is a discount grocery. Focus group participants said that among those who do participate in SNAP/FSP are young mothers who have few cooking skills and people who want greater choice in food items.

People who switch between the programs usually live closer to town and supermarkets. The shift tends to be from FDPIR to the SNAP/FSP with subsequent return to the FDPIR. People switch to food stamps for a short time in order to purchase foods they cannot get from the FDPIR, such as butter and mayonnaise, before switching back to FDPIR. There has been an increase in FDPIR participation that the director believes is tied to the increased cost of transportation—the drive to the discount grocer in Ukiah is now too costly.

SNAP/FSP Staff Perspective. Mendocino County Social Services staff said that they do not see much switching between SNAP/FSP and FDPIR. They think people who choose SNAP/FSP do so because they can buy the food they want.

VI. Overall Assessment and Suggestions by Respondents

The director said that the Sherwood Valley FDPIR faces three main challenges: transportation; eligibility, especially serving tribal members who receive SSI; and capacity. Transportation is critical to the success of the program because it serves so many remote tailgate sites spread out over a large area. Thus, the program's trucks are indispensible. One truck is new, purchased in 2008; however the other two trucks were made in 1989 and 1999 and are approaching the end of their useful life. Equally challenging is the cost of gas—the program's budget for gasoline is $14,000 a year.

Some unemployed, disabled, and/or tribal members do not understand and resent being ineligible for FDPIR because they lack documentation of income or participate in SSI.

Program expansion is limited by capacity—to serve more eligible people the program would need a larger warehouse space and more staff as both are currently "maxed out."

The director made the following recommendations to improve the Sherwood Valley FDPIR:

- Treat the SSI issue as a priority—either offer a waiver of the rule that makes SSI recipients ineligible to receive commodities, or raise the food benefit portion of SSI to be equal to what one would receive in either FDPIR or SNAP/FSP;

- Improve communication with tribes about food choice decisions in ways that do not appear to be patronizing;

- Encourage tribal leadership to take a more active role in supporting calls for program changes; and

- Include cooking classes targeted to younger potential participants to entice them to sign up for commodities. Respondents across the study sites cited younger adults' lack of cooking knowledge and experience as a reason they do not apply to FDPIR.