



United States Department of Agriculture
Office of Inspector General





Overlap and Duplication in Food and Nutrition Service's Nutrition Programs

Audit Report 27001-0001-10

What Were OIG's Objectives

To assess FNS' nutrition programs to identify the potential for overlap and duplication.

What OIG Reviewed

We evaluated the potential for duplication and overlap in the five largest FNS nutrition assistance programs, accounting for 99 percent of FNS' total program budget. We reviewed information about these programs related to FYs 2006 through 2012.

What OIG Recommends

We recommended that FNS determine and document the requirements for conducting a study, to identify and determine the extent to which overlap and duplication may exist in FNS' nutritional assistance programs. We also recommended that FNS determine whether they have the resources necessary to conduct the assessment of the potential overlap of its nutrition programs or whether additional funding will be necessary to complete the assessment.

OIG assessed FNS' nutrition programs to identify potential overlap and duplication.

What OIG Found

The Office of Inspector General (OIG) identified that the potential for overlap and duplication exists among the Food and Nutrition Service's (FNS) 15 nutrition programs, and determined that FNS may be duplicating its efforts by providing participants total benefits in excess of 100 percent of daily nutritional needs when households and/or individuals participate in more than one FNS program simultaneously.

Over many years, Congress has directed FNS to establish a variety of separate nutrition assistance programs, with a variety of purposes, objectives, and client bases. With the growing rate of food insecurity among U.S. households and significant pressures on the Federal budget, it is important to understand how food assistance programs complement one another as a safety net, and how services from these 15 individual programs may be inefficient, due to overlap and duplication. FNS, working with Congress and through the budget process, has made attempts to obtain some efficiencies in its nutrition assistance programs. However, FNS has not performed overarching assessments to evaluate how effectively and efficiently the programs operate together as the Nation's nutritional safety net. OIG concluded that FNS could potentially achieve cost savings by taking actions to eliminate duplication and overlap in its nutrition assistance programs. However, FNS contends that such an assessment would be costly. Since FNS could not quantify the cost, the agency should determine the resources that would be required to conduct such a study. Then FNS should determine whether it has the resources to conduct the study or whether additional appropriated funding will be required. While FNS believes that the network of nutrition assistance programs that make up the national nutritional safety net reflects Congress' recognition of a diversity of needs, FNS generally agreed with our recommendations.



United States Department of Agriculture
Office of Inspector General
Washington, D.C. 20250



DATE: June 13, 2013

AUDIT
NUMBER: 27001-0001-10

TO: Audrey Rowe
Administrator
Food and Nutrition Service

ATTN: Mark Porter
Director
Office of Internal Controls, Audits, and Investigations

FROM: Gil H. Harden
Assistant Inspector General for Audit

SUBJECT: Overlap and Duplication in Food and Nutrition Service's Nutrition Programs

This report presents the results of the subject review. Your written response to the official draft report is included at the end of the report. Excerpts from the response and the Office of Inspector General's position are incorporated into the relevant sections of the report. Based on the information in your written response, we have accepted your management decision on both recommendations.

In accordance with Departmental Regulation 1720-1, final action is to be taken within 1 year of each management decision to prevent being listed in the Department's annual Agency Financial Report. For agencies other than the Office of the Chief Financial Officer (OCFO), please follow your internal agency procedures in forwarding final action correspondence to OCFO.

We appreciate the courtesies and cooperation extended to us by members of your staff during our audit fieldwork and subsequent discussions. This report contains publically available information and will be posted in its entirety to our website (<http://www.usda.gov/oig>) in the near future.

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Background and Objectives

Background

FNS' mission is to provide children and needy families with better access to food and a more healthful diet through its food assistance programs and comprehensive educational efforts. FNS' mission is also to increase food security and reduce hunger in partnership with cooperating organizations by providing children and low-income people access to food, a healthful diet, and nutrition education in a manner that supports American agriculture and inspires public confidence. The Department of Agriculture's (USDA) Center for Nutrition Policy and Promotion (CNPP) provides significant technical guidance to FNS. The center oversees improvements in and revisions to Departmental nutrition guidance, while ensuring the consistency of all guidance with the *Dietary Guidelines for Americans* (DGA). DGA includes principles and recommendations, such as calorie balance, to promote health and prevent disease. Together with the Department of Health and Human Services, USDA established DGA to be the cornerstone of Federal nutrition policy.

Currently, FNS is responsible for administering 15 independent nutrition assistance programs, with a combined fiscal year (FY) 2012 budget of \$114 billion. See exhibit A for a list and description of these programs. The FY 2012 budget for the Supplemental Nutrition Assistance Program (SNAP), the agency's cornerstone program formerly known as the Food Stamp Program, comprises the largest portion of FNS' overall budget at \$88.6 billion.¹ Programs such as the Women, Infants, and Children (WIC) program, which had a budget of \$6.6 billion, and child nutrition programs such as the National School Lunch Program (NSLP), School Breakfast Program (SBP), Summer Food Service, and the Child and Adult Care Food Program (CACFP), which together totaled over \$18 billion, also constitute significant portions of FNS' overall budget for FY 2012.

GAO issued a report in April 2010 that focused on FNS' 15 nutrition programs.² The report noted that there were positive health and nutrition outcomes for the four major FNS food nutrition programs—SNAP, WIC, NSLP, and SBP. The report noted that little is known about the goal outcomes of the smaller FNS food nutrition programs, and that opportunities may exist to eliminate duplication and/or overlap in some of these programs' client bases and administrative functions. GAO recommended that USDA identify and develop methods for addressing potential inefficiencies and reducing unnecessary overlap among smaller programs, while ensuring access to the programs for those who are eligible. USDA agreed to consider the value of examining potential inefficiencies and overlap among the smaller programs. However, USDA also expressed concern that, in the absence of a specific appropriation for a review, any allocation of resources to this effort would shift resources away from other projects and priorities.

¹ This figure includes the \$8.2 billion in FY 2012 SNAP funding provided by the American Recovery and Reinvestment Act.

² GAO report 10-346, *Domestic Food Assistance, Complex System Benefits Millions, but Additional Efforts Could Address Potential Inefficiency and Overlap among Smaller Programs*, April 2010.

Objectives

To assess FNS' nutrition programs to identify the potential for overlap and duplication.

Section 1: Overlap and Duplication of FNS' Nutrition Programs

Finding 1: FNS May be Duplicating Efforts in Providing Nutritional Assistance

FNS may be duplicating its efforts by providing total benefits that exceed 100 percent of daily nutritional needs to program participants when households and/or individuals participate in more than one of FNS' nutrition programs simultaneously. For instance, FNS programs such as SNAP, NSLP, and SBP are structured to provide up to 100 percent, 33 percent, and 25 percent of the recommended daily nutrition, respectively.³ Separate legislative authorizations have established the current 15 separate food and nutrition programs that constitute what is commonly referred to as the national nutrition "safety net." While FNS considers each of the programs to complement each other, it is unclear whether the complementary nature of these programs duplicates FNS' efforts because FNS has not fully assessed its food safety net as a whole to determine the impact of providing potentially overlapping nutritional benefits through multiple programs. If FNS' cumulative program efforts are providing overlapping nutritional assistance, FNS' expenditure of program funds may exceed the amount needed to fulfill the nutritional needs of participants.

Recently, the President cited an immediate need to eliminate wasteful spending and improve the Government's overall effectiveness by identifying and eliminating areas of overlap in Government operations. On March 11, 2011, the President signed a memorandum to the heads of executive departments and agencies that initiated this effort.⁴ Specifically, the President directed that a review be done of all departments and agencies having functions that support one of our most important priorities, increasing trade, exports, and our overall competitiveness by consolidating duplicate and overlapping functions. Over many years, the Federal Government has addressed the issue of good nutrition for individuals in need by enacting several significant Acts, such as the Richard B. Russell National School Lunch Program Act of 1946,⁵ the Child Nutrition Act of 1966, and the Food Stamp Act of 1977. The programs within USDA have various goals related to food security and improved nutrition. However, the programs constituting the Nation's nutrition safety net, authorized separately following separate legislative actions, have generally operated independently of one another. Establishing separate programs intended to focus on specific nutritional needs has created a potential for overlap and duplication among individual FNS programs. Although these individual programs together comprise the Nation's nutritional safety net, the efficiency of this structure and its composite effect are not well known.

³ The Thrifty Food Plan's market basket provides 100 percent of the Recommended Dietary Guidelines. School lunches must provide one-third of the Recommended Dietary Allowances (RDA) for protein, calcium, iron, and vitamins A and C, on average over the course of a week; school breakfasts must satisfy one fourth of the RDAs for the same nutrients. 7 CFR Parts 210 and 220 FNS-2007-0038 RIN 0584-AD59 Nutrition Standards in the National School Lunch and School Breakfast Programs.

⁴ Presidential Memorandum--Government Reform for Competitiveness and Innovation, March 11, 2011.

⁵ As amended through Public Law (P.L.) 108-265, June 30, 2004.

FNS' primary nutrition program is SNAP.⁶ Other FNS programs provide additional benefits targeted to special populations, dietary needs, and delivery settings. FNS estimates that a total of 101 million people currently participate in at least one of its programs, including over 47 million in SNAP, a historically high figure that has risen with the economic downturn and expanded eligibility and funding of food assistance programs. Accordingly, FNS' FY 2012 budget for SNAP was approximately \$88.6 billion. In total, FNS' FY 2012 budget for its 15 other programs was approximately \$25.4 billion.

FNS officials stated that the agency's program statutes and regulations are designed so that eligible people can generally participate in more than one program simultaneously. For example, children that are SNAP clients are also eligible to enroll in the School Breakfast and Lunch Programs. These children may reside in a household where the mother is also eligible to participate in WIC. In addition, an elderly grandparent in the household may be eligible to participate in the Senior Farmers' Market Program. In contrast, officials also stated that in situations where simultaneous participation in two programs would clearly be overlapping, regulations limit clients' participation to one of the two programs. For example, FNS prohibits participation in both SNAP and the Food Distribution Program on Indian Reservations. However, households/individuals can generally combine participation across the majority of the 15 nutrition programs.

FNS commissioned a study that detailed the extent of multiple participation in four major FNS programs—SNAP, WIC, SBP, and NSLP—for a 4-month period in 2006. The study reported that among the families that participated in at least one of the four major programs, about 41 percent participated in only one, and 59 participated in two or more programs.⁷

Since 2006, enrollment and budget figures for FNS' programs have changed significantly. Without current data on multiple program participation and costs, the extent of the potential overlap and duplication currently in FNS programs is unknown. To determine the magnitude of the potential overlap among FNS' safety net of programs and potential savings that could be achieved by reducing any duplication that may occur, additional, updated information about the receipt of multiple benefits and associated costs is needed.

Outlined below is the information currently available about the nutritional benefits FNS provides through various programs toward a participant's recommended daily nutrition or DGA, and the costs associated with the programs:

SNAP: Calculates benefits based upon the Thrifty Food Plan, a model defining the average daily nutritional requirements of a healthful diet for groups of individuals within households distinguished by age and gender. When followed, the Thrifty Food Plan

⁶ The Food and Nutrition Act of 2008 authorized SNAP. It enables participants to improve their diets by increasing the food purchasing power of households by providing them benefits (formerly known as food stamps) that are redeemed at authorized retail grocery stores.

⁷ FNS commissioned Mathematica Policy Research to conduct a study, *Multiple Benefit Receipt Among Individuals Receiving Food Assistance and Other Government Assistance*, which was published July 26, 2010. The study determined that from January to April 2006, an average of 40.6 million people received assistance.

provides 100 percent of a healthy, nutritious diet according to DGA. FNS' FY 2012 budget to deliver SNAP benefits was \$88.6 billion.

SBP and NSLP: Effective July 1, 2012, the school breakfasts and lunches provided through SBP and NSLP had to be in compliance with DGA and provide 25 and 33 percent, respectively, of DGA requirements on average each week. In FY 2012, FNS estimates that 32 million school lunches and over 12 million school breakfasts were served per day at an estimated cost of \$18 billion.

WIC: This program promotes greater health by offering fruits and vegetables, as well as foods that have more fiber and less saturated fat and cholesterol, to qualified women and children. FNS does not specifically evaluate these food items in terms of their contributions toward DGA. WIC delivers benefits in the form of vouchers that participants can redeem for specific, nutritious food items at authorized retailers. In FY 2012, FNS spent approximately \$6.6 billion for WIC benefits.

CACFP: Serves nutritious meals and snacks to children and adults who attend eligible day care programs. Program officials work with USDA's CNPP and the Institute of Medicine⁸ to establish dietary guidelines to meet DGA for each age group participating in the program. FNS estimated the FY 2012 appropriation for providing CACFP food benefits was \$2.8 billion.

FNS' Other Nutrition Programs: Congress has established 10 other, much smaller programs to meet specific needs. See exhibit A. Little is currently known about multiple participation among and between the 10 smaller programs and the 5 larger programs.

However, OIG found indications that FNS does not always take steps to minimize the potential that cumulative benefits could exceed participants' needs. When establishing benefit levels among programs, considering benefits provided by other programs and ensuring that cumulative benefit provisions do not exceed participants' total needs could result in cost savings. Overall, FNS' nutrition program costs for FY 2012 are estimated at \$114 billion.

Over the past several years, FNS has made attempts to streamline some nutrition programs. In response to a Congressional request, in July 2012, USDA provided proposals to address inefficiencies among nutrition assistance programs, particularly the smaller programs, while ensuring access for those who are eligible. Three proposals and FNS' conclusions were presented.

- Transitioning elderly participants in the Commodity Supplemental Food Program (CSFP)⁹ to SNAP. FNS concluded that there were negative consequences to

⁸ The Institute of Medicine is an independent, nonprofit organization that works outside of government to provide unbiased and authoritative advice to decision makers and the public. It is the health arm of the National Academy of Sciences.

⁹ CSFP is a Federally funded program that works to improve the health of low-income pregnant and breastfeeding women, other new mothers up to one year postpartum, infants, children up to age six, and elderly people at least 60 years of age by supplementing their diets with nutritious USDA foods. It provides food and administrative funds to States to supplement the diets of these groups.

transitioning additional CSFP participants to SNAP. Approximately \$2 million in outreach grants to State CSFP agencies would be needed to conduct more aggressive outreach about SNAP, as well as training on the strategies to make this transition work. Even with these efforts, FNS concluded that it is unlikely that all CSFP participants would transition to SNAP, estimating that about one-third of the CSFP caseload would participate in SNAP, while continuing to participate in CSFP. Simultaneous participation in CSFP and SNAP would cost an estimated \$463 million in additional SNAP benefits over 5 years.

- Combining the administrative functions of CSFP and the Emergency Food Assistance Program (TEFAP). FNS concluded that there is no research to support that combining administrative functions of CSFP and TEFAP would lead to reduced administrative costs or greater efficiency, and was unlikely to produce significant savings.
- Options for greater savings within the State administrative expenses. FNS proposed no new initiatives to realize savings, concluding that it consistently works with its State agency partners to drive greater efficiency in program administration through policy options, waivers, demonstration projects, business process reengineering, and information technology modernization.

Over the years, working with Congress and through the budget process, FNS has also made some attempts at seeking efficiencies in the delivery of its nutrition assistance programs. These attempts have generally focused on individual programs or on the relationships between two of its programs, rather than on the complete set of programs constituting the Nation's nutritional safety net as a whole. In FYs 2007, 2008, and 2009, USDA proposed the elimination of CSFP, since the program was only available in limited areas, and overlapped with two of the largest Nationwide Federal nutrition assistance programs—SNAP and WIC. Congress did not adopt the proposal.

For FY 2012, FNS officials reported that they proposed eliminating CSFP at the most severe funding reduction level, and in FY 2013, proposed eliminating the Farmers Market Nutrition Program. However, the Department did not incorporate these proposals into its budget requests for those years.

FNS stated that nutrition assistance is an area where the multiplicity of programs reflects a diversity of needs. However, OIG is concerned that allowing participation across multiple programs may not be the most effective and efficient means of serving the diverse needs of FNS participants. Particularly in an environment of reduced financial resources, the values that any participation in complementary programs may provide toward FNS' objectives must be evaluated in relation to its costs. OIG notes that both the composite effect and the cost of providing benefits through this structure under current conditions are unknown.

FNS has not conducted a study to assess the composite impact of providing overlapping benefits, including, for instance, whether providing cumulative benefits that can exceed an individual's recommended DGA may interfere with intended program outcomes. It is not known, for example, if savings or health benefits could be achieved by adjusting the combined nutritional

benefits of various programs in relation to individuals' participation, or whether adjusting combined benefits in relation to DGAs may improve nutritional outcomes for participants. FNS stated that an effort to identify and assess potential duplication would be difficult. For example, SNAP, the most significant nutrition assistance program, is not designed to track actual food purchases. Therefore, one would not be able to determine the nutritional content a SNAP participant actually receives. To determine this, FNS would have to design some type of representative sample of SNAP participants to confirm what they purchase, which would be a very detailed effort. Then FNS would have to account for benefits from other programs, like NSLP and SBP. FNS stated this effort would be difficult because it does not have the staff to do this. The agency's focus is on managing nutrition assistance programs. To complete this effort would require additional funding from Congress. We have concluded that FNS should determine the resources that would be required to conduct a study to identify the overlap and duplication that may exist in its nutritional assistance programs. Then FNS should determine whether it has the resources to conduct such a study or whether additional funding will be required.

Recommendation 1

Determine and document the requirements for conducting a study, including milestones and estimated costs, to identify and determine the extent to which overlap and duplication may exist in FNS' nutritional assistance programs.

Agency Response

As noted in this report, FNS believes that the network of nutrition assistance programs that makes up the national nutritional safety net reflects Congress' recognition of a diversity of needs, and does not present evidence of overlap and duplication. The OIG's report does not offer any substantive evidence to refute this view. While the recommended feasibility study might provide additional information on potential duplication and overlap, it would also divert limited resources away from other pressing issues of greater policy relevance.

Nonetheless, as we develop a research and evaluation agenda for fiscal year 2014, FNS will include a project to determine and document the requirements—including milestones and estimated costs—for a study that may identify and determine the extent to which overlap and duplication may exist. We will complete this action by September 30, 2013.

OIG Position

We accept FNS' management decision.

Recommendation 2

Determine whether FNS has the resources necessary to conduct the assessment of the potential overlap of its nutrition programs or whether additional funding will be necessary to complete the assessment.

Agency Response

Action on this recommendation is contingent on completion of the feasibility and design study determination included in Recommendation 1. FNS will make an assessment of the availability of necessary resources to conduct an assessment of potential overlap within three months of completion of the feasibility and design study.

OIG Position

We accept FNS' management decision.

Scope and Methodology

In order to evaluate the potential for duplication and overlap in FNS' 15 nutrition programs, we selected the five largest: SNAP, NSLP, SBP, WIC, and CACFP. We reviewed information about these programs from FY 2006 through FY 2012. These five programs accounted for about 99 percent of FNS' total nutrition program budget. For the 10 remaining, much smaller programs, we incorporated information about their performance from an April 2010 GAO report.

In developing the issue in this report, we performed the following steps and procedures:

- Reviewed applicable FNS studies and GAO reports regarding participation in FNS nutrition assistance programs, and incorporated information from these sources into this audit as we deemed appropriate. We did not perform additional tests to verify the information in these reports.
- Reviewed applicable laws, regulations, policies, procedures, and instructions to become familiar with SNAP, NSLP, SBP, WIC, and CACFP.
- Interviewed FNS' national program officials regarding the objectives, intent, client bases served, and agency position on potential duplication and overlap in the five major programs. We also discussed various studies and other publications with these program officials and officials from FNS' Office of Research and Analysis.

We conducted our fieldwork from January through November 2012. During the course of our audit we did not rely on any computer based data, and make no representation regarding the adequacy of any agency computer systems or the information generated from them.

We conducted the audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Abbreviations

CACFP	Child and Adult Care Food Program
CNPP	Center for Nutrition Policy and Promotion
CSFP	Commodity Supplemental Food Program
DGA	<i>Dietary Guidelines for Americans</i>
FDPIR	Food Distribution Program on Indian Reservations
FNS	Food and Nutrition Service
FY	Fiscal Year
GAO	Government Accountability Office
NSLP	National School Lunch Program
OIG	Office of Inspector General
PL	Public Law
RDA	Recommended Dietary Allowances
SBP	School Breakfast Program
SFSP	Summer Food Service Program
SNAP	Supplemental Nutrition Assistance Program
TEFAP	The Emergency Food Assistance Program
USDA	United States Department of Agriculture
WIC	Women, Infants, and Children

Exhibit A: FNS Nutrition Assistance Programs

FNS is responsible for administering 15 independent nutrition assistance programs, with a combined FY 2012 budget of \$114 billion. This table provides a list and description of these programs by target population, benefit type, and numbers of participants.

USDA Program	Target population	Benefit type	Participation (approx.)
SNAP	Individuals and households, specifically low-income households with gross income at or below 130 percent of federal poverty level or net income at or below 100 percent of the poverty level and with limited resources.	Electronic benefits provided to households for food purchases in participating retail stores.	Monthly average of 46.7 million people or 22.5 million households.
National School Lunch Program	Children, specifically school children of high school grades and younger. Students from families with incomes below 130 percent of the federal poverty level (or from families receiving TANF or SNAP) qualify for free meals, and students from families with incomes below 185 percent of the federal poverty level qualify for reduced price meals.	Cash reimbursements and food donations provided to schools for meals and snacks served if the schools agree to serve free and reduced price meals to eligible children. All meals are reimbursed; the meal reimbursement rate varies by the income status of the participating child.	Daily average of 32 million students.
School Breakfast Program	Children, specifically eligible children in schools and residential child care institutions, with children whose families meet income eligibility guidelines qualifying for free or reduced price breakfasts.	Reimbursements to local providers (schools and residential child care institutions) for breakfasts served.	Daily average of 10.6 million students.

WIC	Children and special groups, including low-income pregnant, breastfeeding, and postpartum women, infants, and children to age five determined to be at nutritional risk.	Check, voucher, or electronic benefit transfer benefits provided to recipients to pay for supplemental foods, and to provide nutrition education and health care referrals for participants. Some State agencies distribute WIC foods directly to recipients through warehouses or home delivery.	Monthly average of 8.9 million women, infants, and children.
Fresh Fruit and Vegetable Program	Children, specifically elementary school children in designated schools with a high percentage of students eligible for free or reduced priced meals.	Reimbursements to local providers (elementary schools) for fresh fruit and vegetable snacks served free to students outside of breakfast or lunch periods.	7,100 schools participated during 2011-2012 school year.
Child and Adult Care Food Program	Nutritious meals and snacks to eligible children and adults who are enrolled for care at participating child care centers, day care homes, and adult day care centers, as well as to children and youth who participate in afterschool care programs or reside in emergency shelters.	FNS enters into agreements with State agencies, which in turn enter into agreements with independent centers and sponsors. Meals served are reimbursed based on prescribed rates.	Each day, 3.3 million children receive nutritious meals and snacks through CACFP. CACFP provides meals and snacks to 120,000 adults who receive care in nonresidential adult day care centers.
Senior Farmers' Market Nutrition Program	Elderly people, specifically low-income seniors.	Benefits that can be used to purchase fresh fruits, vegetables, and herbs at authorized farmers' markets, roadside stands, and community supported agriculture programs.	864,000 low-income seniors.

Commodity Supplemental Food Program	CSFP works to improve the health of low-income pregnant and breastfeeding women, other new mothers up to one year postpartum, infants, children up to age six, and elderly people at least 60 years of age by supplementing their diets with nutritious USDA foods.	CSFP provides food and administrative funds to States to supplement the diets of these groups.	For FY 2012, Congress appropriated \$176.8 million for CSFP. Annual appropriations may be supplemented by unspent funds carried over from the previous FY, if available.
Special Milk Program	Children, specifically schoolchildren of high school grade or younger; childcare institutions; and similar nonprofit institutions that do not participate in other federal meal service programs, including NSLP/SBP.	Formula grant that reimburses the cost of milk.	4,628 schools, nonresidential child care institutions, and summer camps participated in serving over 55.3 million half pints.
Summer Food Service Program (SFSP)	Children, specifically children from needy areas, during summer break or when schools are closed for vacation.	Reimbursements to local providers (schools, government agencies, and nonprofit organizations) for meals and snacks served in programs during breaks in school year.	Daily average of 2.3 million children served during the month of July 2011.
Disaster Food Assistance	Provides food when people are in sudden or critical need following a storm, earthquake, flood or other disaster emergency.	FNS coordinates with State, local and voluntary organizations to provide food for shelters and other mass feeding sites, distribute food packages directly to households in need in limited situations, and issue emergency SNAP benefits.	Provided as needed during emergency or disaster situations

Commodity Programs – (Schools - Child Nutrition)	The USDA's Schools/Child Nutrition Commodity Programs support American agricultural producers by providing cash reimbursements for meals served in schools, but also by providing nutritious, USDA-purchased food to NSLP, CACFP, and SFSP.	Participating schools or entities receive USDA entitlement commodities at set values per meal served, and can also receive bonus commodities, as available through USDA's price support and surplus removal programs.	In school year 2012, NSLP entitlement and USDA food benefits delivered totaled \$1.1 billion.
The Emergency Food Assistance Program	Low-income households and individuals.	USDA foods distributed through State agencies to food banks and other agencies, which provide food to local organizations, such as soup kitchens and food pantries, or directly provide the foods to needy households.	USDA foods valued at approximately \$483 million (FY 2011 total) delivered to States and territories for distribution to local organizations.
Food Distribution Program on Indian Reservations	Provides commodity foods to low-income households, including the elderly, living on Indian reservations, and to Native American families residing in designated areas near reservations and in the State of Oklahoma.	USDA purchases and ships FDPIR foods to the Indian Tribal Organizations and State agencies, which store and distribute the food, determine applicant eligibility, and provide nutrition education to recipients.	Currently, there are approximately 276 tribes receiving benefits under the FDPIR through 100 Indian Tribal Organizations and 5 State agencies.
WIC Farmers' Market Nutrition Program	Children and special groups, specifically WIC participants and those on a waiting list to receive WIC benefits (lower-income pregnant, breastfeeding, and postpartum women, infants, and children to age five, who are at nutritional risk).	Coupons provided for purchase of fresh fruits and vegetables at certified farmers markets.	1.9 million women, infants, and children.

**USDA'S
FOOD AND NUTRITION SERVICE'S
RESPONSE TO AUDIT REPORT**



**United States
Department of
Agriculture**

Food and
Nutrition
Service

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Alexandria, VA
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DATE: May 16, 2013

AUDIT
NUMBER: 27001-0001-10

TO: Gil H. Harden
Assistant Inspector General for Audit
Office of Inspector General

FROM: Audrey Rowe /S/
Administrator
Food and Nutrition Service

SUBJECT: Overlap and Duplication in Food and Nutrition Service's Nutrition
Programs

This letter responds to the official draft report for audit report number 27001-0001-10, Overlap and Duplication in Food and Nutrition Service's Nutrition Programs. Specifically, the Food and Nutrition Service (FNS) is responding to the two recommendations in the report.

OIG Recommendation 1:

Determine and document the requirements for conducting a study, including milestones and estimated costs, to identify and determine the extent to which overlap and duplication may exist in FNS' nutritional assistance programs.

Food and Nutrition Service Response:

As noted in this report, FNS believes that the network of nutrition assistance programs that make up the national nutritional safety net reflects Congress' recognition of a diversity of needs, and does not present evidence of overlap and duplication. The OIG's report does not offer any substantive evidence to refute this view. While the recommended feasibility study might provide additional information on potential duplication and overlap, it would also divert limited resources away from other pressing issues of greater policy relevance.

Nonetheless, as we develop a research and evaluation agenda for fiscal year 2014, FNS will include a project to determine and document the requirements – including milestones and estimated costs – for a study that may identify and determine the extent to which overlap and duplication may exist. We will complete this action by September 30, 2013.

OIG Recommendation 2:

Determine whether FNS has the resources necessary to conduct the assessment of the potential overlap of its nutrition programs or whether additional appropriated funding will be necessary to complete the assessment.

Food and Nutrition Service Response:

Action on this recommendation is contingent on completion of the feasibility and design study determination included in Recommendation 1. FNS will make an assessment of the availability of necessary resources to conduct an assessment of potential overlap within three months of completion of the feasibility and design study.

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