

TRIBAL FOOD SECURITY

Opportunities Exist to Address Challenges in Federal Nutrition Programs



Report to Congressional Requesters

July 2024
GAO-24-106218
United States Government Accountability Office

Accessible Version

GAO Highlights

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Highlights of [GAO-24-106218](#), a report to congressional requesters

July 2024

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Why GAO Did This Study

AI/AN populations face significant challenges with food security—that is, having enough food at all times for an active, healthy life. Questions have been raised about whether federal nutrition programs meet tribal communities' unique needs.

GAO was asked to review issues related to tribal food security. This report examines AI/AN food insecurity rates and the food security challenges of tribal communities; the extent to which select federal nutrition programs address tribal communities' needs; and Tribes' role in administering the programs.

GAO interviewed a nongeneralizable group of Tribes and tribal organizations in seven states; state officials in three of these states; and relevant USDA officials. Tribes were selected to reflect regional diversity, food security factors such as rurality, and experience administering programs. GAO reported the most recent USDA data and reviewed relevant federal laws, regulations, and guidance.

What GAO Recommends

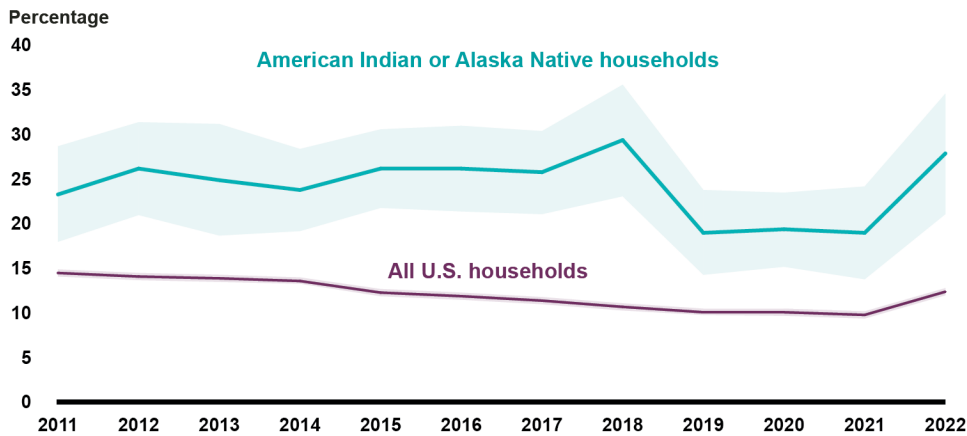
Congress should consider addressing the role of Tribes in administering USDA nutrition programs, including specifying that states consult with Tribes when administering programs. GAO is also making six recommendations to USDA, including that it assess what additional flexibilities could support tribal food security for Tribes and states, and take steps to implement them.

USDA generally concurred with our recommendations, as discussed in the report.

What GAO Found

Food insecurity among American Indian/Alaska Native (AI/AN) households is significantly greater than for all U.S. households, according to recent data (see figure). Tribal representatives reported multiple challenges to food security, including economic barriers such as unemployment, distance to grocery stores, limited access to transportation and healthy food, and environmental factors like weather. Representatives of six of nine Tribes said the high cost of food and inflation were barriers to food security.

Estimated Percentage of Households that Experienced Food Insecurity in the Past 12 Months



Source: U.S. Department of Health and Human Services' Healthy People website. | GAO-24-106218

Accessible Data for Estimated Percentage of Households that Experienced Food Insecurity in the Past 12 Months

Year	All U.S. households (percentage)	American Indian or Alaska Native households (percentage)
2011	14.9	23.7
2012	14.5	26.6
2013	14.3	25.3
2014	14	24.2
2015	12.7	26.6
2016	12.3	26.6
2017	11.8	26.2
2018	11.1	29.8
2019	10.5	19.4
2020	10.5	19.8
2021	10.2	19.4
2022	12.8	28.3

Source: U.S. Department of Health and Human Services' Healthy People website. | GAO-24-106218

Note: Bold lines indicate estimates and shaded areas indicate their 95 percent confidence intervals. For more details, see fig. 2 in GAO-24-106218.

U.S. Department of Agriculture (USDA) nutrition programs have helped address tribal food security challenges such as food availability and quality, but obstacles remain. Implementing and overseeing programs can be challenging in tribal communities due to infrastructure challenges and staffing shortages. USDA offers flexibilities—such as allowing certain community members to certify households for food assistance, according to officials, or allowing waivers for certain program provisions—but selected Tribes continue to report challenges. Additional flexibilities such as streamlining administrative requirements could better position Tribes and states to meet the unique needs of tribal communities as they implement and oversee nutrition programs.

Among the USDA programs GAO reviewed, laws specifying Tribes' roles varied. Six of nine programs provide for tribal administration, but laws for three do not address a tribal role. Selected Tribes also reported challenges with state-administered programs, and laws for most of the nine programs do not require states to consult with Tribes on

matters that affect them. Without addressing a tribal role, including requiring consultation, Tribes may lack the opportunity to provide input to states on nutrition programs that impact their citizens.

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Abbreviations

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AI/AN	American Indian and Alaska Native
CACFP	Child and Adult Care Food Program
CSFP	Commodity Supplemental Food Program
ERS	Economic Research Service
FDPIR	Food Distribution Program on Indian Reservations
FMNP	WIC Farmers’ Market Nutrition Program
FNS	Food and Nutrition Service

HHS	United States Department of Health and Human Services
ITO	Indian Tribal Organization
OMB	Office of Management and Budget
OTR	Office of Tribal Relations
SNAP	Supplemental Nutrition Assistance Program
SFMNP	Senior Farmers' Market Nutrition Program
SFSP	Summer Food Service Program
TEFAP	The Emergency Food Assistance Program
USDA	United States Department of Agriculture
	WIC Special Supplemental Nutrition Program for Women, Infants, and Children



441 G St. N.W.
Washington, DC 20548

July 29, 2024

The Honorable Tom Cole
Chairman
Committee on Appropriations
House of Representatives

The Honorable Raúl M. Grijalva
Ranking Member
Committee on Natural Resources
House of Representatives

The Honorable James P. McGovern
Ranking Member
Committee on Rules
House of Representatives

Questions have been raised about issues tribal communities face with food security—that is, with access at all times to enough food for an active, healthy life. In 2016, the U.S. Department of Agriculture (USDA) reported that among households that received nutrition assistance from its Food Distribution Program on Indian Reservations, low food security was four times more common than for households nationwide.¹ In addition, the prevalence of food insecurity among American Indian and Alaska Native (AI/AN) households has been significantly greater over the past decade than for all U.S. households, according to data collected by USDA. Poor diets and a lack of access to healthy foods may also contribute to high rates of obesity, diabetes, and heart disease experienced by AI/AN populations, according to USDA.² These issues underscore the importance of federal nutrition programs in providing access to healthy foods for AI/AN households.

In recent years, USDA has committed to remove the barriers to tribal access to USDA programs; promote tribal self-determination to enable greater self-governance; and adapt USDA's programs to include tribal values.³ Still, questions have been raised about program accessibility and whether federal nutrition programs meet the unique needs of tribal communities.⁴

You asked us to review issues related to food security in tribal communities. This report examines (1) rates of food insecurity for the AI/AN population and their participation in selected federal nutrition programs, (2) the

¹USDA's Food Distribution Program on Indian Reservations provides food to (1) income-eligible households living on Indian reservations and (2) Native American households residing in designated areas near reservations or in Oklahoma. 7 C.F.R. pts. 253, 254.

²Kaufman, Phillip, Chris Dicken, and Ryan Williams. *Measuring Access to Healthful, Affordable Food in American Indian and Alaska Native Tribal Areas*, EIB-131, U.S. Department of Agriculture, Economic Research Service, December 2014.

³USDA, Equity Action Plan in Support of Executive Order 13985 Advancing Racial Equity and Support for Underserved Communities through the Federal Government, February 10, 2022.

⁴For the purposes of this report, we are defining tribal communities to include individuals living on tribal lands. See app. I for more detail.

food security challenges tribal communities face, (3) the extent to which selected federal nutrition programs address the unique needs of tribal communities, and (4) the role of Tribes in administering selected federal nutrition programs.

We relied on several methodologies to inform our objectives. To provide information on the rates of food insecurity for the AI/AN population and their participation in selected federal nutrition programs, we reviewed available data collected by USDA and reported on the United States Department of Health and Human Services' (HHS) Healthy People website. Based on our review of these data and interviews with USDA staff, we found the data to be sufficiently reliable for the purpose of presenting the trend of AI/AN food insecurity over time.

We reviewed relevant federal laws, USDA regulations and guidance, and other documentation for nine nutrition assistance programs administered at the federal level by USDA's Food and Nutrition Service (FNS). We selected nutrition programs available in, but not limited to, tribal communities. We excluded nutrition programs that are administered through school food authorities—typically, school districts that operate school meal programs locally under agreements with state agencies—due to their additional layer of administration.⁵

We interviewed relevant officials from FNS, including from its national office and regions, as well as USDA's Office of Tribal Relations (OTR), and Economic Research Service (ERS). To understand issues around program access and implementation at the tribal level, we visited a nongeneralizable group of Tribes and tribal organizations in five states—Alaska, Nevada, North Dakota, Oklahoma, and Washington—and interviewed Tribes in two additional states—Michigan and Wisconsin.⁶

We selected Tribes to reflect diversity across regions; population size; unique food security factors, such as water scarcity and rurality; and experience administering programs. We recognize that all Tribes are unique and, because we relied on a nongeneralizable sample of Tribes, the views of those we interviewed may not represent the experiences of other Tribes with respect to the federal nutrition programs we reviewed. We also spoke with relevant state agencies in three states that administer federal nutrition programs to Tribes. To obtain additional information on tribal food security issues, we interviewed representatives from five stakeholder organizations involved in research or advocacy related to nutrition assistance for tribal communities.

We conducted this performance audit from August 2022 to July 2024 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.

⁵These programs include the National School Lunch Program and School Breakfast Program.

⁶See app. I for additional information.

Background

Federally Recognized Tribes and the Federal Government

There are 574 federally recognized Indian Tribes in the United States. The federal government recognizes Tribes as distinct, independent political entities that possess certain powers of self-government. The United States has a unique trust responsibility to protect and support Tribes and their citizens through treaties, statutes, and historical relations with Tribes.⁷ As several tribal leaders have noted, these trust obligations and responsibilities do not exist as a form of charity but as repayment on a nation-to-nation agreement.⁸ Federal recognition of a Tribe establishes a government-to-government relationship between the recognized Tribe and the federal government. In addition, various laws require federal agencies to provide a range of services and benefits to Tribes and their citizens because of their unique political status.

In a 2018 assessment of whether the federal government was meeting its responsibilities to Tribes, the U.S. Commission on Civil Rights found that Native Americans continue to rank near the bottom of all Americans in terms of health, education, and employment.⁹ The Commission attributed this disparity in part to historical discriminatory policies of the federal government toward Tribes, insufficient resources, and inefficiencies in federal programs that serve Tribes.

Tribes can vary greatly in culture, language, population size, land base, location, and economic position. Tribal citizenship is a political classification, and not a racial or ethnic classification. That is, criteria for enrollment in a federally recognized Tribe are generally determined by each Tribe and differ from Tribe to Tribe. Tribes have inherent authority to determine requirements for citizenship; however, some Tribes' citizenship is also subject to requirements in federal law or treaty. According to the Bureau of Indian Affairs, in 2021, there were approximately 2.5 million total citizens of the 574 federally recognized Tribes.

In contrast to tribal citizenship, American Indian or Alaska Native is a racial category, and people who identify as such may or may not be tribal citizens. The U.S. Census Bureau defines an American Indian or Alaska Native as “a person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment.”

Tribal governments have many of the same responsibilities as state and local governments. In addition to serving tribal citizens who reside on lands under a Tribe's jurisdiction, the Tribe may also provide services or benefits to enrolled tribal citizens who do not reside on these lands as well as to others in the community, such as citizens of other Tribes and those who are not American Indian or Alaska Native.

⁷Indian Trust Asset Reform Act, Pub. L. No. 114-178, § 101(3), 130 Stat. 432 (2016) (*codified at* 25 U.S.C. § 5601(3)). The fiduciary responsibilities of the United States to Indians are also founded in part on specific commitments made through written treaties and agreements securing peace, in exchange for which Indians have surrendered claims to vast tracts of land, which provided legal consideration for permanent, ongoing performance of federal trust duties. *Id.* at § 101(4).

⁸National Tribal Budget Formulation Workgroup, *Building Health Equity with Tribal Nations: The National Budget Formulation Workgroup's Recommendations on the Indian Health Service Fiscal Year 2023 Budget* (May 2021), accessed Mar. 11, 2022.

⁹U.S. Commission on Civil Rights, *Broken Promises: Continuing Federal Funding Shortfall for Native Americans* (Washington, D.C.: Dec. 2018).

Food and Nutrition Service

USDA’s Food and Nutrition Service administers nutrition assistance programs that serve tribal communities, as well as broader populations (see table 1).¹⁰ At the federal level, FNS allocates funding, provides oversight, and develops program regulations and guidance. FNS’s regional offices provide support, such as technical assistance and training, to state agencies and tribal governments. State agencies and tribal governments, where applicable, implement the programs directly or through local entities, such as nonprofit organizations.

Table 1: Selected Food and Nutrition Service Nutrition Assistance Programs That Serve Tribal Communities

Program	Description	FY22 funding (rounded to the nearest million)
Child and Adult Care Food Program (CACFP)	Provides nutritious foods to eligible young children, at-risk youth, and adults who are chronically impaired. Foods are provided through agreements with child and adult care institutions and family or group day-care homes.	\$4,315
Commodity Supplemental Food Program (CSFP)	Provides nutritious, domestically sourced and produced foods to eligible low-income individuals at least 60 years of age.	\$332
Food Distribution Program on Indian Reservations (FDPIR)	Provides nutritious, domestically sourced and produced foods to (1) income-eligible households living on Indian reservations and (2) Native American households residing in approved areas near reservations or in Oklahoma.	\$126
Senior Farmers’ Market Nutrition Program (SFMNP)	Provides eligible low-income seniors with benefits that can be exchanged for eligible foods, such as fruits and vegetables, at farmers’ markets, roadside stands, and community-supported agriculture programs.	\$21
Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)	Provides low-income eligible pregnant, postpartum, and breastfeeding women; infants; and children up to age 5 who are at nutritional risk with nutritious foods to supplement participant diets. Also provides nutrition education (including breastfeeding promotion and support) and referrals to health services and other social services.	\$6,001
Summer Food Service Program (SFSP)	Provides free, nutritious meals and snacks to eligible children and teens in low-income areas when school is not in session.	\$581
Supplemental Nutrition Assistance Program (SNAP) ^a	Provides monthly benefits to eligible, low-income households to purchase food from authorized retailers.	\$127,380
The Emergency Food Assistance Program (TEFAP) ^b	Supplements the diets of eligible, low-income people with emergency food assistance at no cost.	\$400
WIC Farmers’ Market Nutrition Program (FMNP)	Provides eligible women, infants, and children with benefits that can be redeemed for eligible foods, such as fruits and vegetables, at farmers’ markets and roadside stands.	\$26

Source: U.S. Department of Agriculture Food and Nutrition Service (USDA). | GAO-24-106218

Note: The programs included in this table are not exhaustive of all Food and Nutrition Service nutrition assistance programs.

^aSNAP funding level does not include funding for program administration or other SNAP components such as SNAP Employment and Training or SNAP Education, according to USDA officials.

^bTEFAP funding level does not include administrative funding or funding for bonus foods distributed through TEFAP outlets, according to USDA officials.

¹⁰In this report, we selected nine key federal programs that provide nutrition assistance in tribal communities for our review.

Food Distribution Program on Indian Reservations (FDPIR)

Of the nine programs above, FDPIR is specifically aimed at assisting eligible households living on Indian reservations and certain Native American households. USDA administers FDPIR at the federal level. State agencies or Indian Tribal Organizations (ITO) administer the program locally to eligible households and provide USDA Foods that are shipped to them by USDA from a list of available foods (see fig. 1).¹¹

Figure 1: USDA-Procured Foods Available for the Food Distribution Program on Indian Reservations, 2024

FRUITS Apple Juice, 100%, Unsweetened Applesauce, Unsweetened, Cups Apricots, Halves, Extra Light Syrup, Canned Blueberries, Native, Frozen (T) Cherry Apple Juice, 100%, Unsweetened Cranberry Apple Juice, 100%, Unsweetened Fruit and Nut Mix, Dried Grape Juice, Concord, 100%, Unsweetened Mixed Fruit, Extra Light Syrup, Canned Orange Juice, 100%, Unsweetened Peaches, Sliced, Extra Light Syrup, Canned Pears, Extra Light Syrup, Canned (K) Plums, Pitted, Dried Raisins, Unsweetened Strawberries, Whole, Frozen, Unsweetened	VEGETABLES Beans, Green, Low-sodium, Canned (K) Carrots, Sliced, Low-sodium, Canned Carrots, Diced, Frozen Corn, Whole Kernel, No Salt Added, Canned (K) Corn, Cream Style, Low-sodium, Canned Hominy, Low-sodium, Canned Mixed Vegetables, 7-Way Blend, Low-sodium, Canned Peas, Green, Low-sodium, Canned Peas, Green, Frozen Potatoes, Dehydrated Flakes Potatoes, Sliced, Low-sodium, Canned Spaghetti Sauce, Low-sodium, Canned Spinach, Low-sodium, Canned Tomato Juice, Low-sodium Tomato Sauce, Low-sodium, Canned Tomato Soup, Condensed, Low-sodium, Canned Tomatoes, Diced, No Salt Added, Canned Vegetable Soup, Condensed, Low-Sodium, Canned	PROTEIN FOODS Beef, Canned Beef, Fine Ground, 85% Lean/15% Fat, Frozen Beef, Round Roast, Frozen Beef Stew, Canned Chicken, Canned Chicken, Boneless Breast, Frozen Chicken, Whole, Frozen Egg Mix, Dried Peanut Butter, Smooth Peanuts, Roasted, Unsalted Pork, Loin Chops, Boneless, Frozen Tuna, Chunk Light, Canned (K)
GRAINS Bakery Mix, Lowfat Cereal, Ready-to-Eat* Cereal, Wheat Farina, Enriched Cornmeal, Yellow Crackers, Unsalted Flour, All Purpose, Enriched, Bleached Flour, White Whole Wheat (WG) Oats, Rolled, Quick Cooking (WG) Pasta, Egg Noodles Pasta, Macaroni, Enriched Pasta, Macaroni and Cheese Pasta, Rotini, Whole Grain (WG) Pasta, Spaghetti, Enriched Rice, Long Grain Tortillas, Whole Grain, Frozen (WG)	DAIRY Cheese, American, Loaves Cheese, American Blended, Reduced Fat, Sliced Milk, 1%, Shelf-Stable UHT Milk, Instant Nonfat Dry Milk, Evaporated, Skim, Canned	LEGUMES Beans, Black, Low-sodium, Canned Beans, Great Northern, Dry Beans, Kidney, Light Red, Low-sodium, Canned Beans, Pinto, Low-sodium, Canned Beans, Pinto, Dry Beans, Refried, Low-sodium, Canned Beans, Vegetarian, Low-sodium, Canned
TRADITIONAL FOODS Bison, Ground, Lean, Frozen (T) Bison, Stew Meat, Frozen (T) Catfish, Fillet, Frozen Cornmeal, Blue (WG) Rice, Wild (WG)(T)** Salmon, Wild, Fillet, Frozen Walleye, Fillet, Frozen (T)	OILS Buttery Spread, Light Oil, Vegetable	SEASONAL PURCHASES Cranberry Sauce, Canned Pork, Pit Ham, Smoked, Frozen Pumpkin, No Salt Added, Canned
	OTHER Butter, Salted Soup, Cream of Chicken, Condensed, Reduced Sodium Soup, Cream of Mushroom, Condensed, Reduced Sodium	KEY: WG - Whole Grain UHT - Ultra-High Temperature Pasteurization K - Kosher Certification Required T - May be sourced from a Tribally-owned vendor *Ready to eat cereal varieties to be determined based on availability. Check WBSM for the latest material codes. **USDA will purchase the wild rice pack size that is available during the time of purchase.

Source: U.S. Department of Agriculture (USDA). | GAO-24-106218

¹¹For the purposes of FDPIR, an Indian Tribal Organization (ITO) refers to either the recognized governing body of any Indian Tribe on a reservation or the tribally recognized intertribal organization that the recognized governing bodies of two or more Indian Tribes on a reservation authorize to operate a food distribution program on their behalf. 7 C.F.R. § 253.2.

Accessible Text for Figure 1: USDA-Procured Foods Available for the Food Distribution Program on Indian Reservations, 2024

Fruits

- Apple Juice, 100%, Unsweetened
- Applesauce, Unsweetened, Cups
- Apricot, Halves, Extra Light Syrup, Canned
- Blueberries, Native, Frozen (T)
- Cherry Apple Juice, 100%, Unsweetened
- Cranberry Apple Juice, 100%, Unsweetened
- Fruits and Nuts Mix, dried
- Grape Juice, Concord, 100%, Unsweetened
- Mixed Fruit, Extra Light Syrup, Canned
- Orange Juice, 100%, Unsweetened
- Peaches, Sliced, Extra Light Syrup, Canned
- Pears, Extra Light Syrup, Canned (K)
- Plums, Pitted, dried
- Raisins, Unsweetened
- Strawberries, Whole, Frozen, Unsweetened

Grains

- Bakery Mix, Lowfat
- Cereal, ready-to-eat*
- Cereal, Wheat Farina, Enriched
- Cornmeal, Yellow
- Crackers, Unsalted

Letter

- Flour, All Purpose, Enriched, Bleached
- Flour, White Whole Wheat (WG)
- Oats, Rolled, Quick Cooking (WG)
- Pasta, Egg Noodles
- Pasta, Macaroni, Enriched
- Pasta, Macaroni and Cheese
- Pasta, Rotini, Whole Grained (WG)
- Pasta, Spaghetti, Enriched
- Rice, Long Grain
- Tortillas, Whole Grain, Frozen (WG)

Vegetables

- Beans, Green, Low-sodium, Canned (K)
- Carrots, Sliced, Low-sodium, Canned
- Carrots, Diced, Frozen
- Corn, Whole Kernel, No Salt Added, Canned (K)
- Corn, Cream Style, Low-sodium, Canned
- Hominy, Low-sodium, Canned
- Mixed Vegetables, 7-Ways Blend, Low-sodium, Canned
- Peas, Green, Low-sodium, Canned
- Peas, Green, Frozen
- Potatoes, Dehydrated Flakes
- Potatoes, Sliced, Low-sodium, Canned
- Spaghetti Sauce, Low-sodium, Canned

Letter

- Spinach, Low-sodium, Canned
- Tomato Juice, Low-sodium
- Tomato Sauce, Low-sodium, Canned
- Tomato Soup, Condensed, Low-sodium, Canned
- Tomatoes, Diced, No Salt Added, Canned
- Vegetable Soup, Condensed, Low-sodium, Canned

Dairy

- Cheese, American, Loaves
- Cheese, American Blended, Reduced Fat, Sliced
- Milk, 1% Shelf-Stable, UHT
- Milk, Instant Nonfat Dry
- Milk, Evaporated, Skim, Canned

Oils

- Buttery Spread, Light
- Oil, Vegetable

Other

- Butter, Salted
- Soup, Cream of Chicken, Condensed, Reduced Sodium
- Soup, Cream of Mushroom, Condensed, Reduced Sodium

Protein Foods

- Beef, Canned
- Beef, Fine Ground, 85% Lean/15% Fat, Frozen
- Beef, Round Roasted, Frozen

- Beef Stew, Canned
- Chicken, Canned
- Chicken, Boneless Breast, Frozen
- Chicken, Whole, Frozen
- Egg Mix, dried
- Peanut Butter, Smooth
- Peanuts, Roasted, Unsalted
- Pork, Loin Chops, Boneless, Frozen
- Tuna, Chunk Light, Canned (K)

Legumes

- Beans, Black, Low-sodium, Canned
- Beans, Great Northern, Dry
- Beans, Kidney, Light Red, Low-sodium, Canned
- Beans, Pinto, Low-sodium, Canned
- Beans, Pinto, Dry
- Beans, Refried, Low-sodium, Canned
- Beans, Vegetarian, Low-sodium, Canned

Seasonal Purchases

- Cranberry Sauce, Canned
- Pork, Pit Ham, Smoked, Frozen
- Pumpkin, No Salted Added, Canned

Traditional Foods

- Bison, Ground, Lean, Frozen (T)

- Bison, Stew Meat, Frozen (T)
- Catfish, Fillet, Frozen
- Cornmeal, Blue, (WG)
- Rice, Wild, (WG)(T)**
- Salmon, Wild, Fillet, Frozen
- Walleye, Fillet, Frozen (T)

Key:

WG - Whole Grain

UHT - Ultra-High Temperature Pasteurization

K - Kosher Certification Required

T - Maybe sourced from a Tribally-owned Vendor

* Ready to eat cereal varieties to be determined based on availability. Check WCSBM for the latest material codes.

** USDA will purchase the wild rice pack size that is available during the time of purchase.

Source: U.S. Department of Agriculture (USDA). | GAO-24-106218

Notes: Foods are subject to change based on market availability. Purchases for traditional foods and seasonal foods are subject to availability of funds and vendor capacity.

The administering ITOs and state agencies store and distribute the foods to FDPIR participants. FDPIR benefits consist of a monthly food package designed to help participants maintain a nutritionally balanced diet, with quantities varying by household size. As of June 1, 2024, in the fruit and vegetable categories, FDPIR households may select up to 20 units of fruit and 20 units of vegetables per person per month. One unit of fruit may consist of three medium apples, and one unit of vegetables may be one bunch of romaine lettuce, for example.¹² FDPIR participants may obtain food items in various ways, based on available options from their ITO or state agency. These include collecting food packages from a main food distribution facility, which may use a warehouse or grocery store model; through mobile distribution sites, such as a truck that parks at a specific location that is closer to where the community resides; or receiving home delivery.¹³

The Agriculture Improvement Act of 2018, known as the 2018 Farm Bill, authorized USDA to establish a demonstration project for tribal organizations that administer FDPIR to enter into self-determination contracts.¹⁴ Under this demonstration project, tribal organizations can purchase food for their FDPIR food package directly

¹²See [FDPIR Monthly Distribution Guide Rates By Household Size | Food and Nutrition Service \(usda.gov\)](#).

¹³Kenneth Finegold et al. "Tribal Food Assistance: A Comparison of the Food Distribution Program on Indian Reservations (FDPIR) and the Supplemental Nutrition Assistance Program (SNAP)." Prepared by the Urban Institute for the U.S. Department of Agriculture Economic Research Service, December 2009.

¹⁴*Agriculture Improvement Act of 2018, Pub. L. No. 115-334, § 4003(b)(2), 132 Stat. 4490, 4625-27.* For the purposes of the FDPIR Self-Determination Demonstration Project, "tribal organization" means the recognized governing body of an Indian Tribe, including the tribally recognized intertribal organization of such Tribes, as the term "Indian tribe" is defined in Section 4 of the Indian Self-Determination and Education and Assistance Act, as well as any Indian Tribe, band, or community holding a treaty with a state government. 7 U.S.C. § 2012(v).

from commercial suppliers, instead of using foods procured by USDA. USDA has awarded more than \$10 million to tribal organizations through two rounds of the demonstration project.

Office of Tribal Relations

USDA's Office of Tribal Relations (OTR) leads the agency's efforts with respect to Tribes. Its work focuses on removing the barriers unique to Indigenous and tribal access to USDA programs and services; promoting tribal self-determination principles in all aspects of USDA's work and programs; and adapting USDA's programs to include tribal values and Indigenous perspectives. OTR's efforts include:

- **Indigenous Food Sovereignty Initiative.** Launched in 2021, OTR is partnering with tribal-serving organizations to incorporate Indigenous perspectives into USDA programs and promote traditional food ways, Indian Country food and agriculture markets, and Indigenous health.
- **Federal-Tribal consultations.** According to USDA's policy on tribal consultation, FNS must provide Tribes the opportunity for government-to-government consultation regarding policy actions which may have tribal implications.¹⁵ OTR, in collaboration with USDA agencies, leads USDA's overall consultation process.¹⁶ For example, in recent years, FNS has hosted several consultations with tribal leadership on FNS programs with OTR's support, according to USDA officials.
- **Tribal Advisory Committee.** USDA's Tribal Advisory Committee, required by the 2018 Farm Bill, was established in 2023 to provide advice and guidance to the Secretary of Agriculture on matters relating to tribal and Indian affairs.¹⁷ OTR provides support and staffing to the Committee.

Food Insecurity Is High among American Indians and Alaska Natives, and the Extent of Their Participation in Selected Federal Nutrition Programs Is Unclear

Data Show that About One in Four AI/AN Households Experiences Food Insecurity, but USDA Does Not Include These Data in Its Flagship Report

Over the past decade, the prevalence of food insecurity among AI/AN households has been significantly greater than for all U.S. households, according to data collected by USDA and reported on the U.S.

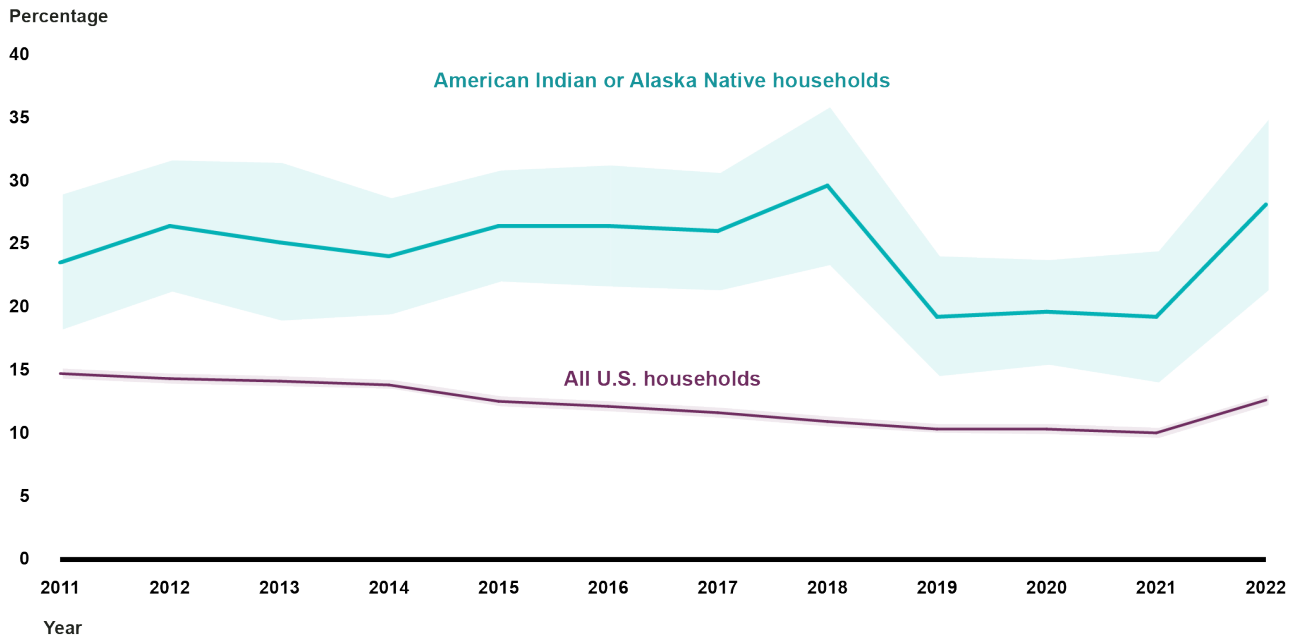
¹⁵USDA's policy on tribal consultation was established to accomplish complete and consistent implementation of Executive Order 13175. USDA defines "tribal implications" as substantial direct effects on one or more Indian Tribes, on the relationship between the Federal Government and Indian Tribes, or on the distribution of power and responsibilities between the Federal Government and Indian Tribes. According to USDA's policy on tribal consultation, pursuant to Executive Order 13175, policies that have tribal implications may include regulations, legislative comment or proposed legislation, and other policy statements or actions. USDA Departmental Regulation on Tribal Consultation, Coordination, and Collaboration, No. 1350-002, January 18, 2013.

¹⁶USDA's tribal consultation process involves the timely, meaningful, and substantive dialogue between USDA officials who have delegated authority to consult, and the official leadership of federally recognized Tribes, or their designated representatives, according to USDA.

¹⁷The authority to maintain this federal advisory committee is vested under the Office of Tribal Relations legislative delegation. 7 U.S.C. § 6921(b).

Department of Health and Human Services' (HHS) Healthy People website (see fig. 2).¹⁸ For example, in 2022, estimates show that about 28 percent of AI/AN households were food insecure, compared to 13 percent of all U.S. households.¹⁹ From 2011 through 2022, estimates indicate that the food insecurity rate for AI/AN households peaked in 2018 at about 30 percent, compared to 11 percent of all U.S. households that year.²⁰

Figure 2: Estimated Percentage of Households that Experienced Food Insecurity in the Past 12 Months, 2011–2022



Source: U.S. Department of Health and Human Services' Healthy People website. | GAO-24-106218

Accessible Data for Figure 2: Estimated Percentage of Households that Experienced Food Insecurity in the Past 12 Months, 2011–2022

Year	All U.S. households (percentage)	American Indian or Alaska Native households (percentage)
2011	14.9	23.7
2012	14.5	26.6
2013	14.3	25.3
2014	14	24.2
2015	12.7	26.6
2016	12.3	26.6
2017	11.8	26.2
2018	11.1	29.8

¹⁸In this report, the AI/AN population includes individuals who identify themselves as American Indians or Alaska Natives only, as opposed to those who identify themselves as having more than one race, including American Indian or Alaska Native.

¹⁹The estimates have margins of error of plus or minus 6.8 percentage points and plus or minus 0.4 percentage points, respectively.

²⁰The estimates have margins of error of plus or minus 6.2 percentage points and plus or minus 0.4 percentage points, respectively.

Year	All U.S. households (percentage)	American Indian or Alaska Native households (percentage)
2019	10.5	19.4
2020	10.5	19.8
2021	10.2	19.4
2022	12.8	28.3

Source: U.S. Department of Health and Human Services' Healthy People website. | GAO-24-106218

Notes: Bold lines indicate the estimates and shaded areas on either side of the lines indicate their respective 95 percent confidence intervals. Estimates for all U.S. households have margins of error of plus or minus 0.4 percentage points across the years; as a result, the shading of confidence intervals is too small to be seen. The race is measured for the household reference person, (i.e., an adult household member in whose name the housing unit is owned or rented).

Although HHS reports these USDA data, USDA itself does not include data specifically on AI/AN household food insecurity estimates in its flagship report on food security.²¹ In *Household Food Security in the United States*—USDA’s annual report series about the degrees of food insecurity in U.S. households—USDA publishes estimates of food insecurity rates by race and ethnicity. However, it does not include household food insecurity estimates for American Indians and Alaska Natives as a separate race category (see fig. 3).²² Instead, American Indians and Alaska Natives are included in the “Other” category, which also includes non-Hispanic adults who identify as Asian, Hawaiian, or Pacific Islander.²³ A representative of a research organization stated that it is insufficient to include AI/AN households in the “Other” category, and such practice fails to reflect the unique experiences of Native American people and communities in the U.S.

²¹<https://www.ers.usda.gov/publications/pub-details/?pubid=107702>.

²²USDA’s *Household Food Security in the United States* reports provide yearly information on the extent and severity of food insecurity in U.S. households. The reports present statistics from a nationally representative survey that covers household food security, food expenditure, and use of federal food and nutrition assistance programs. For example, the reports include information on households by food security status and selected household characteristics, including race and ethnicity, as well as prevalence of food insecurity in households with children by selected household characteristics, among others.

²³The *Household Food Security in the United States* reports include four race/ethnicity categories: “White, non-Hispanic,” “Black, non-Hispanic,” “Hispanic,” and “Other, non-Hispanic.” In the “Other, non-Hispanic” category, because Asians’ food insecurity rates are estimated to be lower than American Indians and Alaska Natives, grouping them into one category masks significant differences among subpopulations.

Figure 3: Snapshot from USDA’s Household Food Security in the United States in 2022

Table 2

Households by food security status and selected household characteristics, 2022

Category	Total ¹ 1,000	Food insecure							
		Food secure		All		With low food security		With very low food security	
		1,000	Percent	1,000	Percent	1,000	Percent	1,000	Percent
Race/ethnicity of household reference persons									
White, non-Hispanic	85,603	77,682	90.7	7,921	9.3	4,522	5.3	3,399	4.0
Black, non-Hispanic	17,271	13,406	77.6	3,865	22.4	2,283	13.2	1,582	9.2
Hispanic ³	19,507	15,453	79.2	4,054	20.8	2,682	13.8	1,372	7.0
Other, non-Hispanic	10,348	9,208	89.0	1,140	11.0	700	6.7	440	4.3

Source: U.S. Department of Agriculture (USDA), Economic Research Service, *Household Food Security in the United States in 2022* (Washington, D.C.: Oct. 2023). | GAO-24-106218

Accessible Data for Figure 3: Snapshot from USDA’s Household Food Security in the United States in 2022

Table 2: Households by food security status and selected household characteristics, 2022

na	Total ¹	Food secure	Food secure	All (food insecure)	All (food insecure)	With low food security (food insecure)	With low food security (food insecure)	With very low food security (food insecure)	With very low food security (food insecure)
Category	1,000	1,000	Percent	1,000	Percent	1,000	Percent	1,000	Percent
Race/ethnicity of household reference persons:	85,603	77,682	90.7	7,921	9.3	4,522	5.3	3,399	4.0
White, non-Hispanic	17,271	13,406	77.6	3,865	22.4	2,283	13.2	1,582	9.2
Race/ethnicity of household reference persons:	19,507	15,453	79.2	4,054	20.8	2,682	13.8	1,372	7.0
Black, non-Hispanic	10,348	9,208	89.0	1,140	11.0	700	6.7	440	4.3
Race/ethnicity of household reference persons:									
Other, non-Hispanic									

Source: U.S. Department of Agriculture (USDA), Economic Research Service, *Household Food Security in the United States in 2022* (Washington, D.C.: Oct. 2023). | GAO-24-106218

USDA officials told us they do not include estimates of AI/AN households as a separate race category in the *Household Food Security in the United States* report because they are not able to present estimates for the detailed levels of food security that are reported for other races. For example, USDA cannot report reliable estimates for “households with *very low* food security among children” for the AI/AN population because the number of these households in the survey is small (see text box).²⁴ However, USDA officials said that they could provide an estimate for overall food insecurity for the AI/AN population, which they consider to be reliable.²⁵

²⁴According to USDA officials, USDA’s protocol used in the *Household Food Security in the United States* report is to not present estimates where the number of households of certain characteristics in the survey is less than 10. For “White, non-Hispanic,” “Black, non-Hispanic,” and “Hispanic” households, the sample sizes are large enough to allow for estimates of low food security and very low food security.

²⁵USDA officials said that small sample sizes resulted in large standard errors for AI/AN estimates. A recently published USDA report combines six years of Current Population Survey (CPS) data from 2016 through 2021 to examine household food security among racial and ethnic groups that comprise a smaller share of the population, including the AI/AN population. The report noted that examining multiple years of data was necessary to overcome limitations from small sample size for some racial and ethnic groups and found that the prevalence of food insecurity was highest (23.3 percent) in households with a reference person who identified as American Indian or Alaska Native. Hales, L. J. and Alisha Coleman-Jensen (2024). *Household food insecurity across race and ethnicity in the United States, 2016–21* (Report No. EIB-269). U.S. Department of Agriculture, Economic Research Service. USDA officials told us this will be a one-time report and it would be difficult to see time trends with data pooled across years.

Barriers to Surveying More American Indians and Alaska Natives (AI/AN)

The food insecurity data used in the U.S. Department of Health and Human Services' (HHS) Healthy People website are from a U.S. Department of Agriculture (USDA) food security supplement that is added to the U.S. Census Bureau's (Census) Current Population Survey (CPS) in December of each year. The HHS food security estimates are derived from this survey.

To increase the AI/AN sample in the CPS to allow for more granular-level food security data, Census officials told us they would need to increase the sample size of the whole sample, which would be prohibitively expensive. Census officials explained that the AI/AN population is small, and thus difficult to target. They further explained that they would have to target the AI/AN population on reservations, and also expand the sample size to target the AI/AN population living outside the reservations. For example, to double the sample size—a change that would reduce the standard errors associated with estimates for the AI/AN population—Census officials explained that that they would likely have to double the number of interviewers, currently at about 2,600.

Alternatively, the Census officials said food security questions could be added to the American Community Survey (ACS). ACS is Census's largest survey and includes sample sizes large enough to provide estimates for smaller subpopulations. However, Census officials said that adding questions to ACS poses challenges as well. The officials said it would require a legislative change and a 5-year cycle of testing to make sure the added questions do not inadvertently impact other questions.

While granular food security data are not available for the AI/AN population, other metrics can be correlated with food insecurity. According to USDA officials and prior GAO analysis, income level, SNAP participation rates, poverty rates, and unemployment rates can be correlated with food insecurity. To that end, we analyzed these metrics in the five states where we conducted site visits and included the estimates in Appendix II.

Source: GAO analysis and GAO interviews with Census and USDA officials. | GAO-24-106218

Although these data are published on the HHS Healthy People website, some stakeholders from research and advocacy organizations we spoke with were either not aware the data exist on HHS's website or could not locate it.²⁶ For example, a representative of one advocacy organization explained that while they are often asked for this information by their network of food banks and key stakeholders in Congress, they were unaware of where to find the information.

Stakeholders we interviewed underscored the need for such data to be more prominent and explained that not including AI/AN households as a separate category in the *Household Food Security in the United States* report

²⁶According to the U.S. Department of Health and Human Services, the Healthy People website provides hundreds of evidence-based resources to help address public health priorities. <https://health.gov/healthypeople>.

makes it difficult to understand the extent of food insecurity for this group.²⁷ According to federal internal control standards, government entities should consider appropriate dissemination methods when communicating information to the general public.²⁸ By not publishing national-level data on food insecurity for AI/AN households in its annual *Household Food Security in the United States* report, USDA has made it challenging for policymakers and other stakeholders to find information on the prevalence of food insecurity for this population and to make informed decisions on addressing their food security challenges.

USDA Lacks Reliable Program Participation Data by Race and Ethnicity, Including for American Indians and Alaska Natives, for Some Programs

For some programs in our review, USDA lacks reliable nutrition program participation data by race and ethnicity, including for the AI/AN households. FNS provides for the collection of race and ethnicity data for certain federal nutrition programs, which is generally required by federal regulation.²⁹ Providing this information is voluntary for applicants, and their decisions about whether to provide race and ethnicity information does not impact their eligibility to participate in federal nutrition programs.³⁰ According to FNS officials, when applicants do not provide their race or ethnicity, state agencies that administer these programs for USDA are required to collect such data through alternative means. These alternative means can include reviewing data from other sources where respondents have provided race or ethnicity information, such as on applications for other assistance programs operated by the state, or through visual observations from program staff for certain programs.³¹ According to FNS, self-identification by the applicant is its preferred way to obtain race and ethnicity data.

Recent FNS policy has moved away from allowing visual observation as an alternative means to collect race and ethnicity data. For example, most recently in December 2023, FNS issued a final rule prohibiting visual observation as an alternative means of collecting race and ethnicity data for participants in the Supplemental

²⁷The Native American Agriculture Fund launched a survey in February 2021 to measure food insecurity for Native populations that aimed to fill the data gap for Native American communities during the COVID-19 pandemic. Their results revealed that many Native American households experienced food insecurity and food access challenges. Since their survey is intended to measure food insecurity for tribal communities, the results are not generalizable to the AI/AN population. Toni Stanger-McLaughlin et al., *Reimagining Hunger Responses in Times of Crisis: Insights from Case Examples and a Survey of Native Communities' Food Access during COVID-19* (Washington, D.C.: Native American Agriculture Fund, Food Research and Action Center, and Indigenous Food and Agriculture Initiative, 2022).

²⁸GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

²⁹For example, FNS produces biennial WIC Participant and Program Characteristics Reports, which include information on the number of participants by race, among others. FNS also collects annual data for CSFP, FDPIR, and SNAP, which include data on participation by race and ethnicity.

³⁰According to FNS officials, FNS requires state agencies that administer USDA programs to maintain a system to collect and report race and ethnicity data in accordance with FNS policy. Providing race and ethnicity information is voluntary for applicants unless the information is required by program regulations.

³¹Because providing race and ethnicity information is voluntary for applicants of some nutrition programs, the data are not complete for these programs. FNS stated that while states often attempt to collect these data through alternative means, it is not always possible to do so. For example, in 2022, FNS officials said they collected race and ethnicity data for approximately 61 percent of households participating in SNAP. Given that complete data may not be obtained, it is even more important that the data collected are reliable.

Nutrition Assistance Program (SNAP), citing accuracy and data reliability concerns, among others.³² Previously, in May 2021, FNS published a policy memo stating that state agencies should remove visual observation as an allowable practice in obtaining race and ethnicity data for the Child and Adult Care Food Program (CACFP) and the Summer Food Service Program (SFSP) due to reliability concerns with this method.³³

However, FNS still allows this practice in other programs, including the Commodity Supplemental Food Program (CSFP), the Food Distribution Program on Indian Reservations (FDPIR), and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). For example, for the WIC program, FNS guidance states that visual observation from program staff must be used for collecting race and ethnicity data if an applicant does not self-identify.³⁴ FNS officials explained that they do not know the extent to which visual observation is used in obtaining race and ethnicity data for WIC. As a result, it is unclear how reliable the race and ethnicity data are in FNS's *WIC Participant and Program Characteristics* report.³⁵ A USDA official stated that FNS is in the process of updating its instruction on civil rights compliance and enforcement on nutrition programs and activities, including the section on race and ethnicity.³⁶ The USDA official also said that the Civil Rights Division is planning to work with program leadership to update the rule on visual observation for the rest of the federal nutrition programs. However, USDA could not provide an estimated completion date for these efforts.

Office of Management and Budget (OMB) Directive 15, Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity, specifies that wherever possible, race and ethnicity data should be collected through self-report.³⁷ In addition, FNS's Civil Rights Division and Child Nutrition Programs guidance states that a third party's observation of an individual's appearance is not a reliable means to capture how a participant self-identifies their own race or ethnicity identity.³⁸

³²88 Fed. Reg. 86,563 (Dec. 14, 2023). FNS stated that the final rule became effective on February 12, 2024, and that the regulatory change is consistent with this Administration's priorities and furthers FNS's commitment to building equitable and inclusive systems for nutrition access.

³³USDA, CACFP 11-2021, SFSP 07-2021 (May 17, 2021). FNS stated that the agency received reports that program participants do not want to have their race or ethnicity determined for them. Moreover, FNS stated that a third party's observation of an individual's appearance is not a reliable means to capture how a participant self-identifies their own racial or ethnic identity. An official from one of the state agencies we interviewed who oversees SFSP and CACFP agreed that the data are likely more accurate now than in the past when visual observation was used.

³⁴USDA, WIC 2002-6, Rev 1 (Apr. 7, 2004).

³⁵The 2020 WIC report noted that caution should be used in the analysis of the race and ethnicity of WIC participants, particularly for American Indians. Kline, N., Zvavitch, P., Wroblewska K., Worden, M., Mwombela, B., & Thorn, B. (2022). *WIC Participant and Program Characteristics 2020*. U.S. Department of Agriculture, Food and Nutrition Service.

³⁶For example, the latest revision of FNS Instruction 113-1 notes that as state agencies modernize and/or implement joint case management systems with other programs or agencies, information on applicants' race and ethnicity may otherwise be available to the FNS-funded program through the information collected by another program. FNS Instruction 113-1: Civil Rights Compliance and Enforcement – Nutrition Programs and Activities.

³⁷In 2022, OMB convened an interagency working group to review and develop recommendations for revising OMB Directive 15, which was last revised in 1997. On March 29, 2024, OMB announced several revisions to Directive 15 that replace and supersede the 1997 revisions. 89 Fed. Reg. 22,182 (Mar. 29, 2024).

³⁸USDA, CACFP 11-2021, SFSP 07-2021 (May 17, 2021).

According to FNS, race and ethnicity data are used to determine how effectively FNS programs are reaching potentially eligible beneficiaries and identify areas where additional outreach is needed.³⁹ Without removing the use of visual observation as a means to collect race and ethnicity data in CSFP, FDPIR, and WIC, the data FNS maintains for individuals participating in these programs may not accurately reflect their race and ethnicity. As a result, USDA cannot assess whether programs are effectively reaching potentially eligible beneficiaries, including American Indians and Alaska Natives.

Tribes Reported Multiple Entrenched Food Security Challenges

Tribal representatives reported multiple entrenched and often compounding challenges to addressing food security, including economic barriers such as unemployment, distance to grocery stores, limited access to transportation and healthy food, and environmental factors such as weather and pollution.

Economic Barriers

Representatives of seven of the nine Tribes we interviewed linked food insecurity to the high poverty rates and limited job opportunities associated with remote areas, where many Tribes are located.⁴⁰ Further, representatives from six of nine Tribes said the high cost of food and inflation were barriers to food security (see fig. 4). For example:

³⁹FNS Instruction 113-1: Civil Rights Compliance and Enforcement - Nutrition Programs and Activities.

⁴⁰According to the National Academies of Sciences, Engineering, and Medicine, areas of persistent poverty are concentrated in reservations and Native villages. National Academies of Sciences, Engineering, and Medicine. *Federal Policy to Advance Racial, Ethnic, and Tribal Health Equity*. (Washington, D.C.: The National Academies Press, 2023). <https://doi.org/10.17226/26834>.

Figure 4: Examples of Food Prices Near Two Alaska Native Villages in 2023

Prices of vegetables in Alaska

Brussel Sprouts	Per/lb.	\$9.55
Cabbage, green	EA	\$5.59
Carrots, mini peeled	Per/lb.	\$8.75
Carrots	Per/2 lb.	\$7.45
Cauliflower	EA	\$9.59
Celery	EA	\$4.09
Garlic	EA	\$2.75
Lettuce	EA	\$5.15
Lettuce, Romaine	EA	\$10.79
Onions	Per/lb.	\$1.79
Pepper Green	Per/lb.	\$6.29
Pepper Red	Per/lb.	\$7.59
Pepper Yellow	Per/lb.	\$6.69

Prices of potatoes in Alaska



Price of eggs in Alaska



Source: GAO. | GAO-24-106218

Accessible Data for Figure 4: Examples of Food Prices Near Two Alaska Native Villages in 2023

Vegetable	Unit	Price
Brussel Sprouts	Per/lb.	\$9.55
Cabbage, green	EA	\$5.59
Carrots, mini peeled	Per/lb.	\$8.75
Carrots	Per/2 lb.	\$7.45
Cauliflower	EA	\$9.59
Celery	EA	\$4.09
Garlic	EA	\$2.75
Lettuce	EA	\$5.15
Lettuce, Romaine	EA	\$10.79
Onions	Per/lb.	\$1.79
Pepper Green	Per/lb.	\$6.29
Pepper Red	Per/lb.	\$7.59

- Photo top right: Prices of potatoes in Alaska
- Photo bottom left: Price of eggs in Alaska

Source: GAO (photos). | GAO-24-106218

Tribal Food Security Challenges in Alaska

Alaska is home to 40 percent of federally recognized Tribes. Many Tribes in Alaska are often also referred to as Native villages. In 2022, we reported that most Native villages are remote and contain only basic infrastructure.

Representatives of two Native villages told us that residents primarily depend on traditional subsistence activities for food because it is less expensive than a grocery store. Subsistence refers to the use of wild, renewable plant and animal resources for food, among other things. Subsistence is an integral way of life for Alaska Native peoples, and, according to Food and Nutrition Service (FNS) officials, represents up to 75 percent of the Alaska Native diet.

Representatives of the Alaska Native villages and one tribal organization identified the prioritization of commercial fishing and hunting over subsistence as a food security challenge. In addition, they said competition from sportsfishers has cut into subsistence fishing, and that as a result, they must now travel farther to find food.

Climate change is also having an impact on tribal food security in Alaska. Community members in one Native village told us climate change has caused changes in surface water, salinity, and temperature, which have affected fishing yields. Representatives of the Alaskan tribal organization told us that due to climate change, permafrost cellars where subsistence foods are sometimes stored have been reportedly collapsing due to warming temperatures.

Source: GAO interviews with representatives of Alaska Native villages and a tribal organization. | GAO-24-106218

- Representatives of one Tribe told us that unemployment among tribal citizens is about 65 percent, and that mothers sometimes go without eating because of the cost of food. Representatives of another Tribe told us that a lot of people in the community participate in SNAP because there are no jobs.
- Several Tribes gave examples of high food prices. When we interviewed them in 2023, one said that in their tribal area, a bag of potatoes cost \$12, a dozen eggs were \$14, and box of cereal was \$10—food they said is too expensive for some tribal citizens to afford. Representatives of a Tribe in Alaska told us that because their area is only accessible by small plane or boat, frozen ground beef cost more than \$10 dollars per pound and a head of romaine lettuce was nearly \$11 dollars. (See sidebar for more information on the unique food security challenges facing Tribes in Alaska.)

- Representatives of another Tribe told us that the opioid epidemic—which has led to the death, incarceration, or inability of some parents to care for their children—has, in turn, led to many grandparents living on fixed incomes having to care for their grandchildren, which is difficult financially.

Distance to Grocery Stores

Six of the nine Tribes we interviewed identified lack of nearby grocery stores as a food security challenge. According to our analysis of USDA and Census data, 42 percent of areas in tribal lands have low grocery store access, compared with 26 percent of the rest of the U.S.⁴¹

⁴¹USDA *Food Access Research Atlas* (2019). Low grocery store access refers to low-income census tracts where more than 100 housing units do not have a vehicle and are more than 0.5 miles from the nearest supermarket, or a significant number or share of residents are more than 20 miles from the nearest food store. Tribal lands include reservations, the Creek Oklahoma Tribal Statistical Area, Alaska Native Village Statistical Areas, and American Indian Trust Lands.

Impact of Formula Shortage on Tribal Food Security

In February 2022, after two infants became ill and two died from *Cronobacter sakazakii* infections linked to infant formula, the nation's largest formula manufacturer voluntarily shut down a major plant and recalled certain powder infant formulas. According to USDA, the closure and recalls worsened existing supply chain issues resulting from the COVID-19 pandemic. Recipients of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) were particularly impacted, because more than half of infant formula nationwide is purchased by WIC participants, according to the U.S. Department of Agriculture (USDA).

WIC beneficiaries in tribal areas were particularly vulnerable to the shortage because they tend to live farther than other Americans from large grocery stores, which had an easier time obtaining formula than small grocers, according to WIC vendors and grocery industry representatives we met with previously. Tribal representatives told us retailers faced challenges stocking formula because of the shortage and the high cost, and that people who could not access formula sometimes requested help on social media. Representatives of another Tribe said that some who could not obtain formula for their babies turned to canned milk and juice, which are less nutritious.

USDA told us that in February 2022 they began issuing waivers that allowed state agencies maximum flexibility from federal requirements as they worked to respond to the recall. In December 2023, USDA issued a final rule to implement the Access to Baby Formula Act of 2022. According to USDA, this rule supports access to formula for WIC participants in unforeseen circumstances like disasters and supply chain disruptions.

Source: USDA and GAO interviews with tribal representatives. | GAO-24-106218

A 2014 study found that households in tribal areas and Alaska Native villages⁴² need to travel farther to get to the nearest supermarket.⁴³ Low access to grocery stores contributes to the difficulty of obtaining fresh, healthy food. For example:

- Representatives from one Tribe said that it is 25 to 40 miles to the nearest grocery stores, and the offerings at these stores are not very good. Representatives of another Tribe said nearly their entire

⁴²In this report, we use the terms "Alaska Native village" and "Native village" to refer to Alaskan communities that are home to at least one federally recognized Indian Tribe. Many Tribes in Alaska are often also referred to as Native villages.

⁴³Kaufman et al, "Measuring Access."

reservation can be classified as a food desert, with the majority of communities having limited access to grocery stores.⁴⁴

- Representatives from two Tribes and one tribal organization described how the choices of people living in tribal communities were mainly limited to small convenience-type stores—such as gas station mini-markets—which have less selection and offer fewer healthy options.
- According to officials from one state, some Tribes have few, if any, grocery stores nearby, including WIC-approved stores. Since WIC purchases such as infant formula must be made at WIC-approved stores in most states, it may be difficult for participants to obtain the nutrition they need for themselves and their children. (See sidebar for discussion of the impact of the infant formula shortage on tribal food security.)

Limited Access to Transportation

The challenge of limited transportation is closely linked to grocery store access, with eight of nine Tribes we interviewed citing limited access to a vehicle or public transportation as a major issue that contributes to food insecurity. For example:

- A representative from a stakeholder organization told us that tribal citizens sometimes do not have gas money to make the long trip to grocery stores.
- Representatives from five of nine Tribes reported that their elderly rely on food deliveries because they do not have access to transportation or are homebound. Representatives of one Tribe told us that they make deliveries to clients who are elderly or homebound (regardless of age), but otherwise staff do not want clients to rely on deliveries because the Tribe would have to make deliveries up to two hours away for clients in rural areas.
- Representatives from one Tribe said that transportation is a barrier to food access, and that drivers often charge for rides, which reduces households' food budgets.

Limited Access to Healthy Food

A 2014 USDA study found that sources of healthy, affordable foods are limited in many tribal communities, which may influence diet and food choices.⁴⁵ Eight of nine Tribes told us that the limited availability of healthy foods is linked to adverse health outcomes, like heart disease, diabetes, and effects on mental health.⁴⁶ For example:

- Representatives of one Tribe stated that the relationship between food security and mental health is an important topic for the Tribe. Not being able to go to the grocery store can result in mental

⁴⁴USDA uses the term "low income and low access" for areas where people have limited access to a variety of healthy and affordable food, according to USDA officials.

⁴⁵Kaufman et al, "Measuring Access."

⁴⁶According to the Department of Health and Human Services, there is a relationship between the inability to access foods that support healthy dietary patterns and negative health outcomes. See <https://health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries/access-foods-support-healthy-dietary-patterns>.

and physical stress, and people may also be discouraged when they do not find the food they need at the store. There are also many diabetics in the community, who require a specialized diet.

- Representatives from another Tribe told us that some parents cannot afford to feed their children nutritious food even though they have multiple jobs, which results in mental health issues such as stress or anxiety.
- Representatives from a third Tribe said that many of the health issues among their citizens stem from the limited food choices available to people. They noted that because of financial pressure, people will turn to unhealthy foods that feed more people, like pizza and tv dinners.
- Representatives of another Tribe told us that fresh produce often goes bad in the single grocery store in their Alaskan village, and people instead purchase processed food such as soda, candy, and chips.⁴⁷

Environmental Factors

Environmental factors like weather or pollution can also threaten food security.⁴⁸ Five of the nine Tribes we interviewed described how their food security has been negatively affected by weather, which can delay truck deliveries and food shipments, and interfere with growing and harvesting food. For example:

- Representatives of one Tribe told us winter storms impacted the ability of stores to open and delayed truck food deliveries, resulting in perishable food spoiling. Representatives of one tribal organization told us that Alaska's extreme regional weather patterns have been known to regularly interrupt airline food deliveries, and that in severe cases, this can result in stores having to shut down due to a lack of inventory.
- In Alaska, where approximately 95 percent of the food is shipped from out of state, freight planes and barges cannot make deliveries in bad weather, according to representatives of two Alaska Native villages. As a result, some villages may not receive food deliveries for up to a month, according to one tribal organization. Representatives of one Alaska Native village told us that by the time food arrives, its nutritional value may have been degraded, it may have a short remaining shelf life, or it may have already passed its expiration date.
- One Tribe in the West noted water pollution made it difficult to harvest traditional trout and cattails.

⁴⁷According to state officials in Alaska, due to inadequate storage facilities, pallets containing produce may be left out on the tarmac in sub-zero weather, which decreases the food's quality.

⁴⁸According to the Environmental Protection Agency, tribal communities are affected by climate change impacts that threaten infrastructure, food sources, and cultural practices, and Indigenous populations may be more vulnerable to the health impacts of climate change than the general population. See Environmental Protection Agency, "Climate Change and the Health of Indigenous Populations," (Washington, D.C., December 27, 2023), accessed April 8, 2024, <https://www.epa.gov/climateimpacts/climate-change-and-health-indigenous-populations>.

FNS Programs Have Improved Food Access and Quality, But Obstacles Remain

Building a Meat Processing Plant to Strengthen Tribal Food Security

Tribes overwhelmingly reported shortages of food during the COVID-19 pandemic, according to tribal representatives we met with. Officials from two Tribes told us they took steps to address this challenge by using CARES Act funds to construct meat processing plants that enable their Tribe to have more control over meat production and supply.

By March 2020, according to representatives from one of these Tribes, the Tribe had exhausted its supply of meat and had no way to process meat from its cattle herd because of COVID-related supply chain issues. To address this situation and to prevent future food insecurity, the Tribe decided to use CARES Act funding to build its own meat processing plant. Tribal representatives told us the plant was completed in 2020 and its retail butcher counter is able to accept SNAP benefits. The plant can process beef, bison, pigs, and deer, and includes 19,000 square feet for the Tribe's own cattle and bison herds. One tribal representative told us that the CARES Act funding kick-started the Tribe's efforts at food sovereignty—the ability for tribal nations and communities to feed their own people on their own terms, according to the U.S. Department of Agriculture.

Source: Tribal documentation and GAO interviews with tribal representatives. | GAO-24-106218

FNS programs have helped address some tribal food security challenges such as food availability and quality, but tribal representatives and state and FNS officials told us that FNS programs continue to face obstacles in addressing food security needs. These obstacles include challenges related to the statutory prohibition against dual participation in SNAP and FDPIR, FNS program outreach, and implementation of FNS programs.

Federal Nutrition Programs Have Mitigated Certain Food Security Challenges

Improving Food Availability and Quality

FNS programs have addressed some challenges associated with food availability, according to representatives of all nine Tribes we interviewed. For example, representatives noted the importance of SFSP, which ensures children can access food when school is not in session, and WIC, which can start providing benefits before a

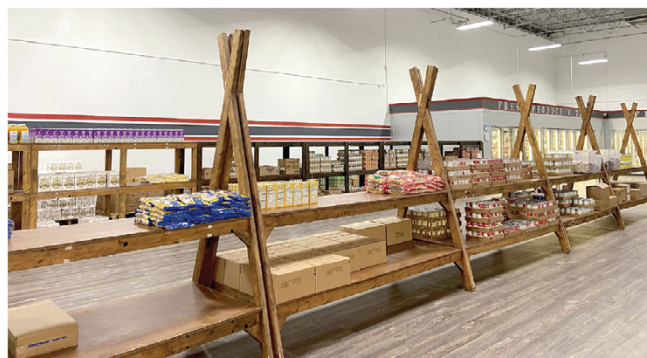
child's birth.⁴⁹ While food from FDPIR has traditionally been issued as a monthly food package with the quantity of food determined by household size, several ITOs have developed grocery store models for their FDPIR programs, which tribal representatives said makes it more convenient for participants. Representatives of one Tribe told us that their FDPIR grocery store enables participants to pick up food several times throughout the month, which reduces waste and is helpful to families who do not have much storage space (see fig. 5).

Figure 5: Examples of How Households that Participate in the Food Distribution Program on Indian Reservations (FDPIR) May Receive Benefits



Example of monthly food distribution for the Food Distribution Program on Indian Reservations, using sealed boxes.

Source: GAO (photos). | GAO-24-106218



Examples of a grocery store concept where FDPIR participants can select the items in their monthly food packages.



Accessible Text for Figure 5: Examples of How Households that Participate in the Food Distribution Program on Indian Reservations (FDPIR) May Receive Benefits

- Photo Left: Example of monthly food distribution for the Food Distribution Program on Indian Reservations, using sealed boxes.

⁴⁹Starting in summer 2024, as part of FNS's Summer Electronic Benefit Transfer Program, states and certain tribal organizations will be able to provide \$40 per summer month per child to families with eligible school-age children for them to buy groceries. Consolidated Appropriations Act, 2023, Pub. L. No. 117-328, div. HH, tit. IV, § 502(c), 136 Stat. 4459, 5990.

- Photo Right: Examples of a grocery store concept where FDPIR participants can select the items in their monthly food packages.

Source: GAO (photos). | GAO-24-106218

Importance of Traditional Food

Representatives from five Tribes and a tribal organization we met with stressed the importance of incorporating traditional foods—which some of them said can bolster physical and mental health or strengthen Indigenous identity—into their diet. Representatives of the tribal organization told us that traditional foods are more nutritious than many of the manufactured food items offered through supplemental nutrition programs such as SNAP and FDPIR.

According to representatives of one Tribe, traditional food's importance to their health and livelihood is deeply ingrained. According to the Tribe's creation story, a sky woman fell from the world above onto a turtle, and healthy food—such as squash, beans, and strawberries—and a variety of medicines grew from her body. The Tribe views itself as having a reciprocal relationship with food and expresses its gratitude with a harvest celebration. One tribal representative told us their Tribe views food as medicine because food provides physical, spiritual, and economic benefits and also fosters culture and well-being. The Tribe focuses on using food pathways to help members strengthen their Indigenous identity and reconnect with their land, community, culture, and language.

Source: GAO interviews with tribal representatives. | GAO-24-106218

Representatives of five Tribes we met with said that FDPIR provides good quality food; two of these Tribes and one tribal organization said the quality of food in FDPIR packages has improved over the years. For example, a tribal representative noted a shift from lower quality food items to selections like salmon and fresh eggs, and said these changes have decreased the stigma previously associated with receiving this food. According to representatives from one Tribe, FDPIR's fresh food offerings are more nutritious than the processed foods that people tend to choose under SNAP, even though SNAP can be helpful.⁵⁰

⁵⁰According to representatives of another Tribe, people could spend all of their SNAP benefits on items like soda, salty snacks, and candy.

Representatives of three Tribes we met with told us that the FDPIR program can provide foods that are culturally specific to some Tribes (see sidebar).⁵¹ In February 2023, the FDPIR Food Package Review Work Group—which includes, among others, representatives of tribal organizations, state agencies, and FNS—voted to move forward with procuring bison stew meat to be included as a meat option in FDPIR. Representatives from one Tribe noted that Tribes can vary widely in what they eat, and in April 2023, USDA asked Tribes for input about what specific traditional foods they would like to see in USDA food packages. According to USDA officials, discussions about tribal needs and preferences have continued regularly since this time.

Providing Nutrition Education Programs

FNS's nutrition education programs, which provide guidance on healthy eating and preparing traditional foods, have been important in providing nutritional and cultural knowledge, according to tribal representatives and state agency officials. For example, one Tribe has used its FDPIR nutrition education funds to teach about Indigenous activities such as beekeeping, pickling, and gathering berries. In addition, FNS has created an online sharing gallery to assist FDPIR staff in providing nutrition education and information to their program participants. According to FNS officials, this collection of resources and opportunities was created by and for tribal communities.⁵² The FDPIR coordinator in one Tribe said that she uses the USDA website to help FDPIR participants learn to prepare foods in the FDPIR package.⁵³ As of June 2024, FNS reported allocating nearly \$8 million to 96 ITOs and state agencies to support culturally appropriate nutrition education delivered by FDPIR programs. In FY 2025, according to FNS, an additional \$4 million will be available to Tribes that administer FDPIR to deliver nutrition education.⁵⁴

Challenges Related to FNS Programs Remain

Although FNS programs have helped to mitigate some food security challenges, they continue to face challenges, according to tribal representatives and state and FNS officials we interviewed. Particular challenges involved the statutory prohibition against dual participation in SNAP and FDPIR, outreach to Tribes and others about FNS programs, and implementation and oversight of programs.

⁵¹Rulemaking efforts could enable other FNS programs to provide more culturally specific foods. In November 2022, USDA released a proposed rule on revisions to WIC food packages. FNS stated that the proposed changes would provide WIC state agencies with greater flexibility to tailor food packages that accommodate cultural food preferences, such as expanding whole grain options to include foods like quinoa, teff, wild rice, millet, and corn meal. 87 Fed. Reg. 71,090 (Nov. 21, 2022). A final version of this rule was issued in April 2024. 89 Fed. Reg. 28,488 (Apr. 18, 2024). In February 2023, USDA released a proposed rule on child nutrition programs that would, among other things, make changes to nutrition standards in school meal programs, CACFP, and SFSP to make it easier to serve traditional foods such as breadfruit, prairie turnips, plantains, sweet potatoes, and yams. 88 Fed. Reg. 8,050 (Feb. 7, 2023). A final version of this rule was issued in April 2024. 89 Fed. Reg. 31,962 (Apr. 25, 2024).

⁵²<https://www.fns.usda.gov/fdpir/fdpir-sharing-gallery>.

⁵³The FDPIR coordinator added that FNS offers resources to help with nutrition education specific to Native Alaskans' dietary needs, including online and print materials, and onsite nutrition education.

⁵⁴On June 5, 2024, FNS announced the award of cooperative agreements to support the use of traditional Indigenous foods in various child nutrition programs, including, among others, the National School Lunch Program (NSLP) and School Breakfast Program (SBP), SFSP, and CACFP, according to USDA officials. Over \$2 million was awarded to five organizations to provide training and technical assistance to school nutrition professionals on procurement, preparation, and crediting of traditional Indigenous foods. The cooperators will also develop culturally relevant nutrition education materials for students to accompany the traditional Indigenous foods that are served, and the cooperators will train school nutrition professionals and other school staff on providing nutrition education to students.

Switching between Supplemental Nutrition Assistance Program (SNAP) and Food Distribution Program on Indian Reservations (FDPIR)

Tribal households may switch between SNAP and FDPIR for various reasons, including differences in benefits or food offerings. Representatives of three Indian tribal organizations (ITO) told us that some participants chose to switch from FDPIR to SNAP during the pandemic because FNS increased SNAP benefits during that time. (FNS also offered additional FDPIR foods to FDPIR participants through an optional CARES Act Food Package.) In addition, according to an ITO representative, some food items are only available in the SNAP program, including many cooking essentials. This representative said that people may switch programs to obtain items important to their family's meals, such as seasoning or yeast.

Source: GAO interviews with ITO representatives. | GAO-24-106218

Prohibition against Dual Participation in SNAP and FDPIR

Challenges with eligibility determinations. By statute, eligible households may not enroll in both SNAP and FDPIR programs concurrently.⁵⁵ This prohibition against dual participation in SNAP and FDPIR poses administrative challenges that can affect the provision of services, according to representatives of four Tribes and officials from one FNS regional office. For example, several of these representatives expressed concern about the time it can take to verify that an applicant is not enrolled in both programs. According to some officials, this waiting period can lead to a delay, during which applicants do not receive benefits from either program.

For example, representatives of one Tribe told us that there can be a 30- to 60-day lapse in benefits if someone is switching between FDPIR and SNAP, which limits how people can obtain food (see sidebar).⁵⁶

⁵⁵FDPIR was authorized under the Food Stamp Act of 1977. Pub. L. No. 95-113, § 1301, 91 Stat. 913, 961.

⁵⁶According to USDA, SNAP agencies have 30 calendar days to provide benefits to eligible households in response to a regular application and seven days to do so in response to an expedited application. Under FDPIR, the state agency or ITO must provide eligible households with an opportunity to receive food as soon as possible, but not less than seven calendar days, excluding weekends and holidays, after an application was filed.

Supplemental Nutrition Assistance Program (SNAP) backlog in Alaska

According to the Alaskan state agency that administers SNAP, a backlog of applications in 2022 left over 14,000 applicants waiting for an eligibility determination longer than the federal deadline of 30 days for non-expedited applications.

Tribal representatives and state officials we interviewed told us this backlog negatively affected tribal food security in Alaska. One resident of an Alaska Native village explained that a lot of people she knew had not received SNAP benefits in a long time. She said that her SNAP recertification was completed in November 2022, but as of May 2023 she had not heard anything back. She noted that one of the last times she called the state office, there was a 4-hour wait on the phone. Another representative said that a lot of families in the village depended on a nearby food bank to help them address food insecurity during the backlog. In February 2024, the Secretary of Agriculture sent a letter to the Alaska Governor's Office, urging them to prioritize application timeliness and to ensure that their SNAP program meets basic federal requirements.

Source: U.S. Department of Agriculture documentation and GAO interviews with tribal representatives and state officials. | GAO-24-106218

A representative of an Alaska Native village described a SNAP backlog in Alaska that left applicants waiting for eligibility determinations, underscoring these challenges (see sidebar).

Tribal leaders stated at consultations with USDA that information sharing between FDPIR and SNAP offices for the purposes of dual participation verification has been a longstanding challenge. They also observed that the burden of verifying that an applicant is only enrolled in one program often falls on the ITO, rather than the state SNAP agency.⁵⁷ Similarly, FNS officials said that while the responsibility for preventing dual participation should be shared between state SNAP agencies and the entities that run FDPIR programs, in some cases this burden falls more on the FDPIR programs. Tribes we met with reported difficulties verifying whether FDPIR applicants were enrolled in SNAP because of outdated computer systems in state offices, the lack of familiarity with FDPIR on the part of some state officials, poorly functioning automated call-in systems, and low responsiveness by state offices.

⁵⁷In 2016, USDA established the Tribal Leaders Consultation Working Group on the FDPIR to focus on processes to support a better program for tribal participants.

Tribes also expressed concerns related to sharing information with states or other entities, including information associated with enrolling in SNAP or FDPIR. At a consultation with FNS, tribal leaders stated that they did not think it was appropriate to share personally identifiable information of their citizens with states.⁵⁸

USDA's tribal consultation policy states that it is important for USDA to facilitate collaboration and communication between states and Tribes.⁵⁹ FNS officials told us that the agency is in the process of developing a memo that will provide SNAP state agencies and FDPIR-administering agencies additional guidance on preventing dual participation.⁶⁰ As of May 2024, this memo was still under review by USDA. With more FNS support to improve the verification process, such as by facilitating appropriate communication and information sharing, Tribes and tribal organizations would be able to more effectively enroll applicants in FDPIR and ensure timely access to this nutrition program.

Impact on tribal food security. Beyond the administrative issues stemming from the statutory prohibition on dual participation, representatives of two Tribes and one stakeholder organization we interviewed expressed concern with the prohibition's overall impact on tribal food security. For example, a representative of one Tribe stated that the Tribe has ongoing needs beyond what people are receiving from either FDPIR or SNAP and noted that removing the prohibition would support good nutrition among FDPIR clients. Although both FDPIR and SNAP are intended to supplement families' food resources, a 2016 study found that FDPIR was the sole or main source of food for 38 percent of FDPIR-receiving households.⁶¹ This suggests that these households may have additional food needs beyond what they are receiving from FDPIR.⁶² The study also found that a higher percentage of households that received FDPIR had low or very low food security compared to all U.S. households.

Further, although both programs support low-income households, they differ in key respects. For example, SNAP beneficiaries receive benefits to purchase food at SNAP-authorized retailers, while FDPIR beneficiaries receive monthly food packages (see fig. 6). Also, as noted in the earlier sidebar, because FDPIR does not include many essentials for cooking, according to representatives from one tribal organization, participants switch back and forth between SNAP and FDPIR programs. As previously discussed, this becomes an administrative burden for both programs and affects the participants. According to USDA officials, at USDA consultations tribal leaders expressed their preference for more flexibility, including allowing dual participation in SNAP and FDPIR.

⁵⁸Representatives of one Tribe we met with told us that during the pandemic, the local sponsoring agency for TEFAP wanted them to collect household information such as names and income on those receiving food boxes during the pandemic. Tribal representatives told us they refused to collect these data.

⁵⁹USDA's Departmental Regulation 1350-002 on Tribal Consultation, Coordination, and Collaboration.

⁶⁰This memo follows a 1997 memo that focused on preventing dual participation.

⁶¹Pindus, Nancy M., Carol Hafford, Diane K. Levy, Jennifer Biess, Jasmine Simington, Carl Hedman, and Jody Smylie, June 2016. "Study of the Food Distribution Program on Indian Reservations (FDPIR): Final Report." Prepared by the Urban Institute for the U.S. Department of Agriculture Food and Nutrition Service.

⁶²We previously reported that officials told us that no one program alone is intended to meet a household's full nutritional needs. GAO, *Domestic Food Assistance: Complex System Benefits Millions, but Additional Efforts Could Address Potential Inefficiency and Overlap among Smaller Programs*, [GAO-10-346](#) (Washington, D.C.: Apr. 15, 2010).

Figure 6: Characteristics of Supplemental Nutrition Assistance Program (SNAP) and Food Distribution Program on Indian Reservations (FDPIR)

	SNAP	FDPIR
Eligible participants and locations	Offers assistance to low-income individuals and families across the U.S. and in certain territories.	Provides USDA Foods to 1) income-eligible households living on Indian reservations, and 2) Native American households residing in approved areas near reservations or in Oklahoma.
Benefits	Provides benefits to participants via an electronic debit card that can be used to purchase food at SNAP-authorized retailers.	Provides USDA Foods directly. Participating households receive a monthly package of food items.

Source: U.S. Department of Agriculture (USDA). | GAO-24-106218

Accessible Text for Figure 6: Characteristics of Supplemental Nutrition Assistance Program (SNAP) and Food Distribution Program on Indian Reservations (FDPIR)

	SNAP	FDPIR
Eligible participants and locations	Offers assistance to low-income individuals and families across the U.S. and in certain territories.	Provides USDA Foods to <ul style="list-style-type: none"> income-eligible households living on Indian reservations, and 2) Native American households residing in approved areas near reservations or in Oklahoma.
Benefits	Provides benefits to participants via an electronic debit card that can be used to purchase food at SNAP-authorized retailers.	Provides USDA Foods directly. Participating households receive a monthly package of food items.

Source: U.S. Department of Agriculture (USDA). | GAO-24-106218

In its 2022 Equity Action Plan, USDA committed to removing the unique barriers for Indigenous and tribal access to USDA programs and services.⁶³ The final report of the USDA Equity Commission, which recommends actions to ensure equitable access to USDA programs and services for historically underserved communities, identified the prohibition on dual participation as a policy that disproportionately limits program access for a historically underserved group.⁶⁴ FNS officials told us the agency is working on two studies of FDPIR, but it does not currently plan to study the prohibition against dual participation or its impact on tribal food security. Studying the impact of FDPIR’s prohibition against dual participation—including any obstacles to

⁶³USDA, Equity Action Plan, Feb. 10, 2022.

⁶⁴Final Report: USDA Equity Commission: “Shaping Change at USDA: Recommendations Made to the U.S. Department of Agriculture to Advance Equity for All,” February 22, 2024.

food security posed by the process for switching from one program to another—could help FNS ensure it has done all it can to remove barriers to access and enable tribal participants to obtain the nutrition they need.⁶⁵

Outreach

Lack of awareness about FNS programs and obstacles to outreach also hinder access to FNS programs. Representatives and officials from four Tribes and one FNS regional office said lack of awareness of FNS programs on the part of Tribes and tribal participants was a problem. For example, representatives from two Tribes described a lack of awareness about state-administered nutrition programs, and one of these representatives stated that their Tribe did not have information from FNS about SNAP. According to officials in one FNS regional office, there is a general lack of awareness about FDPIR in their region because the program tends to be small. They added that the SNAP/FDPIR dual participation prohibition may cause program participants to think they cannot concurrently participate in other programs, such as SNAP and CSFP. Finally, officials from one state said that many tribal citizens' nutritional needs are not being met due in part to a lack of awareness of WIC.

Representatives and officials from two Tribes, one state, one tribal organization, and one FNS regional office we interviewed told us that increased outreach could help address this lack of awareness. In addition, in a 2016 study FDPIR program staff said that more outreach is needed to help families understand FDPIR eligibility criteria.⁶⁶ However, according to representatives of one Tribe and one tribal organization, conducting outreach to tribal communities can be uniquely challenging because of resource constraints and lack of materials. Representatives of one Tribe told us it was difficult to get the word out about FNS programs because it can be expensive to advertise in print and few tribal elders are on social media.⁶⁷ ITO representatives we met with told us that because they have fewer outreach materials for FDPIR than for SNAP, their FDPIR outreach is more limited. Officials from another state said outreach to tribal citizens about FNS programs is one of their biggest challenges, and they have been trying to hire people from tribal communities to make their outreach more effective.

Officials from a state agency told us that it would be helpful to have an outreach toolkit specifically targeted to tribal communities, as well as recruitment and marketing help from USDA on how to connect tribal citizens with programs. USDA officials suggested that outreach materials be available in multiple languages, and in alternative formats for individuals with disabilities. They also recommended exploring the possibility of forming a workgroup with representatives from tribal communities to obtain feedback and ensure their needs are being met in the areas of outreach, recruitment, marketing, etc.

FNS has taken steps to support outreach, such as developing online materials for printing and distribution. FNS officials told us that the agency recently added an online resource library where Tribes can order printed

⁶⁵According to FNS officials, the agency is still evaluating the overall impact of Executive Order 14112 on its programs, including the prohibition against dual participation in SNAP and FDPIR. Officials noted that because the prohibition is statutory, any changes to it would require amendment to law by Congress. Executive Order 14112, issued in December 2023, directs federal agencies to take various actions to increase the accessibility and flexibility of federal funding and support programs for Tribes. 88 Fed. Reg. 86,021 (Dec. 11, 2023).

⁶⁶Pindus, Nancy. M. et al, 2016.

⁶⁷According to FNS, FNS reimburses state agencies for up to 50 percent of allowable administrative costs, including outreach activities.

materials to promote nutrition education in FDPIR, such as brochures, posters, stickers, and cards.⁶⁸ FNS officials also told us that the agency works with tribal organizations such as the National Association of FDPIR to spread awareness, promote initiatives, and share information such as proposed rules. At a tribal consultation in February 2024, FNS shared information with Tribes about the agency’s outreach efforts in one region.

However, even with such efforts, gaps in awareness and outreach remain. Federal internal control standards emphasize the importance of communicating quality information externally so external parties can help entities achieve their objectives.⁶⁹ In its Equity Action Plan, USDA has committed to expanding equitable access to USDA nutrition programs to ensure that those who qualify are able to participate.⁷⁰ By systematically identifying gaps in outreach, determining how to best address those gaps, and taking appropriate steps—such as regularly soliciting feedback about outreach at tribal consultations—FNS can create additional opportunities to ensure that those who are eligible for its nutrition programs are able to participate in them.

Geographic Challenges to Program Implementation in Alaska

The unique geographic challenges in Alaska make it particularly difficult to implement and oversee FNS programs there, according to state officials and representatives of Tribes and one tribal organization. Representatives from one state agency and the tribal organization said that Tribes need as much flexibility as possible to implement and oversee programs because of these conditions. According to state officials, people living 50–100 miles from a state office likely live in remote areas, and their only transportation options are generally a small plane, boat, or snow mobile. Officials from another state agency told us there are no Child and Adult Care Food Program (CACFP) day-care homes in western Alaska in part because it would cost a sponsoring organization too much to conduct the required three monitoring home visits per year. As a result, officials said, no Tribes or tribal organizations have become program sponsors. In April 2023, just before our site visit to Alaska, FNS issued a memo that provided guidance for the state agencies and local operators that implement CACFP and laid out the monitoring tasks that could be completed off-site.

Source: USDA documentation and GAO interviews with tribal representatives and state officials. | GAO-24-106218

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⁶⁸ <https://orders.gpo.gov/usdafsnd/pubs>.

⁶⁹ GAO-14-704G.

⁷⁰ USDA, Equity Action Plan, Feb. 10, 2022.

Implementing and overseeing FNS programs can be challenging in tribal communities (see sidebar). According to representatives of six Tribes and one stakeholder organization, infrastructure challenges can pose obstacles to program access and implementation.⁷¹ For example, representatives of one Tribe said that participants may have trouble applying for SNAP by mail because tribal communities in their state tend to have post office boxes that are harder to access than home-delivered mail. They also said that applying for SNAP at call centers can be difficult because people may have low-cost cell phone plans that limit their minutes, making it difficult for them to wait on hold for a response from the state. Officials in one state told us there are connectivity challenges, such as lack of internet access in some areas, and this can make it hard for local agencies to get people signed up for programs like WIC.

Challenges with physical infrastructure—such as lack of storage space and freezer capacity—can also prevent Tribes from fully benefiting from FNS programs. For example, a representative of a tribal organization described a Tribe not offering some healthy food options in FNS programs because it lacks freezer and cooler capacity. Representatives of one Tribe told us that they were not able to have elders teach traditional food preparation because they no longer have a walk-in refrigerator or freezer.

Staffing shortages, including for specialized staff, also make it difficult to implement programs in tribal communities, according to representatives from four Tribes and one tribal organization. According to representatives of the tribal organization, tribal staff often perform multiple jobs, and several Tribes that the organization works with have had challenges providing oversight because of lack of staff. Further, officials from a state agency in Alaska told us that some Alaska Native villages do not have a dedicated liaison or caseworker to assist clients with their paperwork. These officials also told us that Tribes struggle to hire and retain specialized staff such as registered dietitians because there are shortages in this field, especially of Native Alaskan dietitians, and the training for the job can take up to one year. Similarly, officials in another state said that it is difficult to hire lactation specialists that support WIC implementation.

Given these challenges, it can be difficult for some Tribes to meet programs' administrative requirements, such as managing the reporting requirements of multiple programs or assisting clients with online applications, according to representatives of five Tribes and one tribal organization we met with.⁷² A representative of one Tribe told us that she spends the majority of her work time ensuring the 10 families on FDPIR in her village receive their benefits, and that while more families would likely qualify for FDPIR, she does not have the administrative capacity to add them. A representative of one tribal organization said that she has considered dropping CSFP because of the paperwork and administrative burden, but she knows that Tribes need the program to serve their isolated communities.

Representatives from three Tribes also said it can be difficult to manage multiple FNS programs with different requirements. Representatives of one Tribe said it would be helpful for USDA to streamline requirements—for example, the process to get waivers—across programs so that Tribes do not need to hire different staff for

⁷¹Officials from one state agency and one FNS regional office described these challenges as well.

⁷²In 2022, we reported that according to selected agency officials, tribal recipients, and others, some Tribes faced challenges with the administrative burden of accessing and using certain COVID-19 relief funds because of limited staffing and capacity to carry out additional administrative functions during the pandemic. We also found that managing reporting requirements and deadlines across multiple programs across several agencies can strain the administrative capacity of tribal recipients. *GAO, COVID-19 Relief Funds: Lessons Learned Could Improve Future Distribution of Federal Emergency Relief to Tribal Recipients*, [GAO-23-105473](#), Washington, D.C.: (Dec. 15, 2022).

multiple programs. FNS officials said they often hear about administrative burdens across the board and noted that larger Tribes often are better equipped in terms of infrastructure and resources than smaller Tribes.

FNS has offered flexibilities that may have helped to address some of these challenges. The Food and Nutrition Act permits Alaska to use individuals known as fee agents—paid agents who may be community members, according to FNS officials—who assist with the application on behalf of the state in rural areas by completing applications, conducting interviews, and securing required documentation for the state agency. In addition, if geographic or climatic conditions within a state make it difficult to implement a specific regulatory provision of SNAP, the administering agency may request a waiver to that provision.⁷³ FNS offers various flexibilities for other programs, according to USDA officials, such as allowing state agencies and ITOs to qualify for an administrative match waiver for FDPIR if funding their share of the costs would be a financial or substantial burden for the state agency or ITO.⁷⁴

While ITOs and states that administer FNS programs to Tribes have been beneficiaries of some of FNS's waivers and other flexibilities, they continued to report challenges implementing or overseeing FNS programs. Tribal representatives said additional flexibility and streamlining of nutrition programs would help them with implementation. When asked what steps FNS has taken to address these challenges, agency officials told us that regional and national staff have helped administering agencies—such as Tribes—when they have reached out for technical assistance. USDA was not able to provide specific information on any other actions the agency plans to take to provide additional support for Tribes.

The December 2023 Executive Order on Reforming Federal Funding and Support for Tribal Nations directs agencies to take various actions to increase the accessibility and flexibility of federal funding and support programs for Tribes.⁷⁵ For example, the Executive Order directs federal agencies to increase the flexibility of federal funding for Tribes by removing, where feasible, unnecessary limitations on tribal spending to the maximum extent practicable and consistent with applicable law. It also directs agencies to reduce Tribes' administrative burden by taking measures such as streamlining application and reporting processes. In its USDA Equity Action Plan, USDA has committed to removing barriers to access to USDA nutrition programs for Tribes and expanding equitable access to these programs to ensure that those who qualify are able to participate.⁷⁶ Efforts by FNS to identify and implement additional or enhanced flexibilities could better position Tribes and states to implement and oversee needed nutrition assistance programs in tribal communities.

⁷³7 C.F.R. § 272.3(c).

⁷⁴On August 14, 2023, FNS issued a notice of proposed rulemaking on “Food Distribution Programs: Improving Access and Parity” that would allow for a waiver authority for FDPIR similar to the administrative waiver available for SNAP administration, as previously described. The comment period ended on October 13, 2023. 88 Fed. Reg. 54,908 (Aug. 14, 2023).

⁷⁵Exec. Ord. No. 14112, 88 Fed. Reg. 86,021 (Dec. 11, 2023). The Executive Order defines federal funding and support programs for Tribal Nations to include funding, programs, technical assistance, loans, grants, or other financial support or direct services that the Federal Government provides to Tribal Nations or Indians because of their status as Indians. It also includes actions or programs that do not exclusively serve Tribes, but for which Tribal Nations are eligible along with non-Tribal entities. It does not include programs for which both Indians and non-Indians are eligible.

⁷⁶USDA, Equity Action Plan, Feb. 10, 2022.

Laws for Some FNS Programs Do Not Specify a Tribal Role, and Tribes Reported Challenges with State Administration that Can Affect Program Access

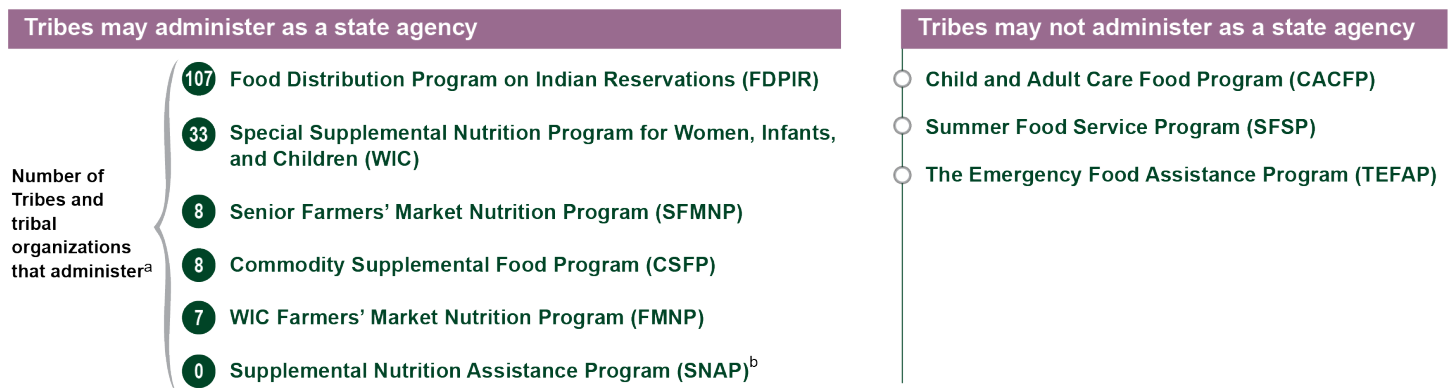
Tribes May Administer Certain Nutrition Programs but Not Others, and States Administer Programs when Tribes Do Not

Tribes and tribal organizations have the option to administer some nutrition programs, but not others. While FNS administers nutrition programs at the federal level, states, Tribes, and tribal organizations, where applicable, receive funding to administer and implement nutrition programs at the state level. Administering nutrition programs at the state level includes conducting activities such as:

- determining participant eligibility;
- issuing benefits to eligible households; and
- distributing foods directly to eligible participants or through local partners, such as nonprofit agencies.

For multiple nutrition programs—CSFP, FDPIR, FMNP, SFMNP, and WIC—relevant statutes and regulations permit tribal administration as state agencies.⁷⁷ As of December 2022, more than 100 ITOs administered FDPIR, according to FNS (see fig. 7). Laws governing SNAP allow Tribes to administer the program in certain circumstances.

Figure 7: Tribal Administration of Selected Federal Nutrition Programs, Fiscal Year 2023



Source: U.S. Department of Agriculture Food and Nutrition Service; and GAO review of applicable federal laws and regulations. | GAO-24-106218

⁷⁷ 7 U.S.C. 2013(b); 42 U.S.C. § 1786(b)(13); 7 C.F.R. §§ 247.1, 248.2, 249.2.

Accessible Text for Figure 7: Tribal Administration of Selected Federal Nutrition Programs, Fiscal Year 2023

Tribes may administer as a state agency	Tribes may administer as a state agency	Tribes may not administer as a state agency
Number of Tribes and tribal organizations that administer ^a	<ul style="list-style-type: none"> • 107: Food Distribution Program on Indian Reservations (FDPIR) • 33: Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) • 8: Senior Farmers' Market Nutrition Program (SFMNP) • 8: Commodity Supplemental Food Program (CSFP) • 7: WIC Farmers' Market Nutrition Program (FMNP) • 0: Supplemental Nutrition Assistance Program (SNAP)^b 	<ul style="list-style-type: none"> • Child and Adult Care Food Program (CACFP) • Summer Food Service Program (SFSP) • The Emergency Food Assistance Program (TEFAP)

Source: U.S. Department of Agriculture Food and Nutrition Service; and GAO review of applicable federal laws and regulations. | GAO-24-106218

^aAs of January 2024, there are 574 federally recognized Tribes in the United States, according to the Department of the Interior's Bureau of Indian Affairs.

^bIndian Tribal Organizations (ITO) may receive permission to directly administer SNAP if the Secretary determines that (1) the state agency is failing to administer it, and (2) the ITO is capable of effectively and efficiently administering it. 7 U.S.C. § 2020(d); 7 C.F.R. pt. 281.

For an ITO to administer SNAP, the Secretary must further determine that the state is failing to administer the program on its reservation.⁷⁸ According to FNS officials, no ITOs administer SNAP in its entirety; however, in a few states some Tribes are involved in administering parts of the program through partnerships between the states and Tribes, not due to state failure to administer the program on a reservation (see text box). Appendix III provides participation data for each of the selected federal nutrition programs that Tribes or tribal organizations administer.

⁷⁸7 U.S.C. § 2020(d). For the purposes of SNAP, an ITO is the recognized governing body of any Indian Tribe on a reservation or the tribally recognized intertribal organization which the recognized governing bodies of two or more Indian Tribes on a reservation authorizes to operate SNAP or a Food Distribution program on their behalf. 7 C.F.R. § 271.2.

Tribal Involvement in SNAP Administration in Three States

In partnership with Supplemental Nutrition Assistance Program (SNAP) state agencies in three states (Minnesota, Washington, and Wisconsin), Tribes are increasing their involvement in SNAP administration.

In Washington, the Tribal Eligibility Demonstration Project, begun in 2009 with one Tribe, was developed to increase program access to serve Native American SNAP clients living in a remote area of the state with limited transportation. In 2023, the project expanded to include five additional Tribes. The project allows the Tribe to perform SNAP eligibility and certification activities, functioning like a local SNAP office, by taking applications, conducting interviews, determining eligibility and benefit levels, and issuing Electronic Benefits Transfer cards. The state continues to provide support and oversight to the tribal offices.

SNAP state agencies in Minnesota and Wisconsin, two states where counties have a role in administering SNAP, allow certain tribal offices to operate like county offices. According to the U.S. Department of Agriculture's (USDA) Food and Nutrition Service, this helps ensure culturally competent access to SNAP by allowing tribal citizens hired under a merit system to conduct eligibility interviews and case determinations. Like Washington, these states continue to provide support and oversight to the tribal offices.

Source: USDA Food and Nutrition Service. | GAO-24-106218

States administer federal nutrition programs when Tribes do not. This includes CACFP, SFSP, and TEFAP (see fig. 7), whose program statutes and regulations do not address a tribal role in administration, unlike the other federal nutrition programs we reviewed.⁷⁹ Instead, FNS has issued guidance to clarify how Tribes can participate in each program.⁸⁰ According to FNS, a tribal government may:

- sponsor day care homes or centers under CACFP that provide nutritious foods to eligible children, at-risk youth, and adults;
- operate local sites under SFSP that provide free, nutritious meals and snacks to eligible children and teens in low-income areas when school is not in session; and
- participate as an eligible recipient agency under TEFAP to provide emergency food assistance to eligible low-income people.

Tribes Reported Challenges with State Administration that May Affect Program Access

Some Tribes we interviewed reported challenges with state administration of federal nutrition programs that can reduce access to benefits for tribal citizens, and thereby increase food insecurity. For example, tribal representatives spoke of difficulties with program accessibility in state administered programs. Representatives from one Tribe described the application process for some state administered programs as daunting, in part because tribal citizens have to travel long distances to apply. Representatives from a second Tribe that

⁷⁹For example, SNAP outlines requirements which, if met, allow Tribes to administer SNAP as a state agency. 7 U.S.C. § 2020(d).

⁸⁰USDA policy clarifies the ability of Tribes to participate in CACFP, SFSP, and TEFAP through states. See <https://www.fns.usda.gov/cn/tribal-participation-cacfp-and-sfsp> and <https://www.fns.usda.gov/tefap/eligibility-indian-tribal-organizations>.

administers WIC said that program participation would likely drop if tribal citizens instead were made to access the program through the state because the nearest WIC office is more than 30 miles away.

Tribal representatives also noted that there can be a lack of trust in state administered programs. They said that state WIC program officials do not understand the challenges facing tribal citizens as well as Tribes and are therefore less effective in providing counseling and nutrition education. Another Tribe's representative said that when Tribes have the authority to administer nutrition programs, and when the people running the programs are from their community, program recipients have more trust in the programs and outcomes are better.

Some tribal stakeholders and representatives described additional challenges for Tribes in working with states to access nutrition programs. For example, tribal stakeholders reported that the inability of Tribes to directly administer TEFAP posed a significant barrier to food access during the COVID-19 pandemic.⁸¹ Further, representatives from one Tribe we visited described challenges to participation in TEFAP that stemmed from state-specific requirements. Specifically, tribal representatives said the state required Tribes to use a tax-exempt sponsor—in this case, a food bank—as an intermediary for TEFAP, rather than the Tribe participating directly as an eligible recipient agency, creating an administrative hurdle for the Tribe. The representatives explained that this arrangement also required the Tribe to purchase the food from the food bank to give away, which resulted in extra costs to the Tribe. They added that the Tribe would have the capacity to manage TEFAP, if the state's policy was changed.

Tribal stakeholders we interviewed also identified problems for Tribes becoming CACFP sponsors. They said that in their view some states do not respect tribal governments as sovereign nations, but instead treat them like small non-profit organizations. The tribal stakeholders told us this view has led some Tribes to remove themselves from the program, which may negatively impact tribal citizens' access.

State agency officials we interviewed also identified related challenges they face working with Tribes on programs that are under state administration. For example, officials from one state said that Tribes applying to be sponsors under CACFP sometimes are reluctant to submit required personal information to support program oversight. The officials said this can prevent Tribes from being able to sponsor day care homes or centers, which serve eligible children, at-risk youth, and adults. Tribes reported that sharing personally identifiable information about tribal citizens can present data sovereignty concerns. Representatives from one Tribe said that data sovereignty and data management are growing increasingly important due to cybersecurity concerns, among others.

Most of the Tribes we interviewed told us they would prefer the option to administer federal nutrition programs directly instead of receiving benefits through states.⁸² For example, a representative from one Tribe told us that as a sovereign entity, the Tribe does not want to receive TEFAP from the state. Representatives from another Tribe told us that passing Congressional appropriations through states to Tribes breaks the federal trust responsibility to Tribes by making them subrecipients of the state, and therefore, unduly subjected to state law,

⁸¹Parker, Erin, and Griffith Hotvedt, Carly, et al. September 2022. *Gaining Ground: A Report on the 2018 Farm Bill Successes for Indian Country and Opportunities for 2023*. Prior Lake, Minnesota: Shakopee Mdewakanton Sioux Community.

⁸²Tribes do not always administer the federal nutrition programs they are allowed to administer, and Tribes we interviewed told us that capacity is an important consideration when deciding whether to administer a program. One tribal representative said that Tribes would not ask to administer a program if they do not feel they have the capacity to do so.

policies, procedures, and governance. They added that the Tribe is best positioned to be a direct recipient of USDA funding to run federal programs as it knows its community best. Providing funding to the Tribe, they said, would enable the Tribe to serve its people more cost effectively than a state, as well as enable USDA to meet its goals of providing nutrition assistance.

USDA officials said they do not have legal authority to allow Tribes to administer CACFP, SFSP, or TEFAP as state agencies, unlike other FNS programs.⁸³ Officials said, however, that the Secretary of Agriculture has directed the Office of Tribal Relations (OTR) to support tribal administration of TEFAP if Congress provides that authority. An official with OTR noted that some programs, such as TEFAP and other child nutrition programs, may have inadvertently omitted a specific role for Tribes. Tribal representatives we interviewed stated that it is important for legislation that affects them to explicitly address the role of Tribes. Reconsidering the role of Tribes in the relevant statutes of additional nutrition programs could help mitigate barriers to program access for tribal citizens and others that may result from challenges Tribes face with state administration of the programs.

Only SNAP Requires State-Tribal Consultation

SNAP State-Tribal Consultations

Supplemental Nutrition Assistance Program (SNAP) state agencies are required to consult with Tribes in the development of SNAP State Plans of Operation. USDA's Food and Nutrition Service (FNS) stated that it expects SNAP state agency officials to engage in timely, meaningful, and substantive dialogue with tribal leadership. FNS said it will confirm that state agencies have consulted with Tribes before approving SNAP plans.

However, Tribes have reported challenges with state consultations. Representatives from one Tribe we visited said that the state has not effectively engaged them in consultations. Through federal consultations with USDA, tribal leaders have reported a lack of outreach and consultation from SNAP state agencies. FNS officials said they have held webinars for SNAP state agencies on requirements for SNAP state consultations and to highlight best practices. FNS said it will also provide technical assistance, as needed, and appropriate corrective action for SNAP state agencies that fail to follow requirements.

Source: U.S. Department of Agriculture (USDA) and GAO interviews with Tribes. | GAO-24-106218

⁸³According to USDA officials we interviewed, there would be cost implications for TEFAP if Congress were to expand administration to Tribes. They said TEFAP would likely need additional funds to cover the benefits and administrative costs of a new model that includes Tribes.

Requirements for state agencies to consult with Tribes about programs states administer also differ across federal nutrition programs.⁸⁴ Of the nine programs we examined, only SNAP has a statutory requirement for state-tribal consultation (see sidebar on next page).⁸⁵ According to USDA, where required for the program, each state must provide USDA with assurances that delivery of services and programs has been preceded by meaningful consultation with tribal governments.⁸⁶ For example, USDA guidance states that SNAP consultation should include areas of program operation such as locations and hours of benefits certification and issuance, among others.⁸⁷ Tribal representatives in one state gave a specific example of how coordination could have supported program implementation. They said their state did not consult with the Tribe when

the state started using call centers for SNAP. If the state had consulted with the Tribe, they said the state would have understood the impact of having limited access to cell phones for many people in Indian country. Nearly a year later, the Tribe reported that call centers remain a challenge.

Nearly all of our nine selected programs, however, do not have statutory requirements for states to consult with Tribes, including the three programs (CACFP, SFSP, and TEFAP) that Tribes also may not administer. An official from OTR said that consultation between states and Tribes for additional programs would improve the quality of nutrition program delivery from states. However, FNS officials told us that it is unclear under current law if FNS can require states to consult with Tribes on programs other than SNAP because laws do not specifically give the agency this authority. Without legislative changes, Tribes may lack the opportunity to engage in meaningful consultation with states for most of the federal nutrition programs we reviewed, as well as to provide input on changes that affect Tribes, their citizens, and the broader communities Tribes may serve. These include programs that Tribes told us were among the most important for their communities. These also include programs for which Tribes have reported facing challenges, and, notably, the three programs that Tribes may not administer themselves.

⁸⁴According to USDA, state consultation with Tribes about the implementation of nutrition programs for tribal citizens is not a substitute for federal government-to-government consultation with Tribes. At the federal level, USDA and its agencies are required to provide federally recognized Tribes the opportunity for government-to-government consultation regarding policy actions which may have tribal implications. According to USDA, this ensures that tribal perspectives on the social, cultural, economic, and ecological aspects of agriculture, as well as tribal food and natural resource priorities and goals, are heard and fully considered in the decision-making processes of the Department and its agencies. USDA Departmental Regulation on Tribal Consultation, Coordination, and Collaboration, No. 1350-002.

⁸⁵Under FDPIR regulations, if the administering agency is not an ITO, the appropriate agency of the state government shall consult in good faith with the ITO on the reservation where the appropriate agency of state government is responsible for administering FDPIR. 7 C.F.R. § 253.5(a)(i). According to FNS officials, three states administer FDPIR, either in whole or by performing partial program operations on behalf of selected Tribes in their state.

⁸⁶USDA, *Action Plan: Tribal Consultation and Strengthening Nation-to-Nation Relationships*, April 26, 2021.

⁸⁷USDA, Food and Nutrition Service, Memo on Supplemental Nutrition Assistance Program - Tribal Consultation, September 13, 2022.

Tribes Described Benefits from Self-Determination Authority

FDPIR Self-Determination Demonstration Project

The 2018 Farm Bill required USDA to establish a demonstration project for tribal organizations administering the Food Distribution Program on Indian Reservations (FDPIR) to enter into self-determination contracts to purchase foods for the FDPIR food package for their Tribe. In contrast, under typical FDPIR operations, the foods provided to Tribes are purchased and provided by USDA.

Through the FDPIR Self-Determination Demonstration Project, participating Tribes and tribal organizations are able to:

1. select foods that they would like to procure for inclusion in the food package,
2. identify the food(s) in the food package that they would like to supplant—that is, exchange one for another—with the tribally procured food(s),
3. establish contract(s) with a vendor(s) to procure the selected food(s), and
4. distribute the tribally procured food(s) alongside other USDA-provided foods in the FDPIR food packages distributed to their participants.

Source: U.S. Department of Agriculture (USDA). | GAO-24-106218

USDA's FDPIR Self-Determination Demonstration Project offers greater control to Tribes that administer FDPIR, empowering them to purchase foods that align with cultural and traditional preferences, according to Tribes we interviewed (see sidebar).⁸⁸ Tribes also reported that the demonstration project supports tribal producers and helps address health disparities, among other things. Representatives from a participating Tribe told us that FDPIR once contributed to separating tribal citizens from an Indigenous diet, making them more reliant on highly processed foods (e.g., foods with excessive salt, sugar, and unhealthy fats). The program now allows citizens to choose healthier options, and tribal representatives said they are seeing their citizens feel more empowered in improving their health. According to USDA, the demonstration project recognizes tribal sovereignty by supporting food purchasing decisions that allow for more traditional, tribally grown, local and regionally produced foods. Tribes we interviewed have used the project to:

⁸⁸As of March 2024, USDA awarded more than \$10 million to Tribal Nations through two rounds of the demonstration project. See <https://www.fns.usda.gov/fdpir/self-determination>.

- **Procure native Alaska cod and halibut, in place of USDA walleye and catfish not local to the region.**⁸⁹ According to tribal organization representatives, the addition for some Tribes of halibut and cod—their traditional foods—has improved the well-being of tribal citizens who appreciate that the foods they are eating come from close to home. They said the project has been significant in helping Tribes achieve food security with culturally appropriate foods.
- **Distribute the Tribe’s homegrown apples, beef, and bison, in place of USDA foods.** Tribal representatives said it has been transformative to add high-quality, culturally relevant foods to their FDPIR package, especially because the products are from the Tribe’s own farm and are of better quality than food available at the grocery store.
- **Purchase walleye from a selected tribal vendor, in place of USDA walleye.** According to a tribal representative, purchasing walleye through a tribal vendor at a lower cost allows participants to have walleye on a continual basis, rather than when USDA makes it available.

Tribal representatives and FNS officials have also described benefits of tribal collaboration resulting from the project. For example, representatives from one participating Tribe said it has collaborated with other Tribes to identify Native food producers, which has led to an increase in overall production. These representatives said that a goal of many Tribes in the region is to strengthen the intertribal agricultural network, and every Tribe has products they can share and sell to one another to build this intertribal food system. FNS officials from one region told us that while Tribes in their region have not yet applied to the FDPIR Self-Determination Demonstration Project, the Tribes have benefitted from learning about the experiences of participating Tribes through the region’s partnership with another regional office.

Tribes we interviewed—as well as tribal leaders in USDA consultations—report they want an expansion of self-determination authority. Tribal representatives we interviewed made the following suggestions:

- **Make the demonstration project permanent.** Representatives from a tribal organization said the project allows Tribes to be nimble in their FDPIR administration, and that continuing this authority is the best thing that can be done to keep the program relevant and responsive to tribal communities. OTR officials told us that they have been pleased with the demonstration project and would welcome it becoming permanent, should Congress decide to make it so.
- **Expand authority to compact.** The 2018 Farm Bill authorized USDA to contract with tribal organizations that administer FDPIR to perform purchasing functions under FDPIR. USDA is not authorized to enter into self-governance compacts with Tribes, which differ from self-determination contracts in some key areas. For example, Tribes with self-governance compacts may generally reallocate funds for programs included in the compact in any manner that the Tribe determines to be in the best interest of the tribal community being served.⁹⁰ Representatives from one Tribe said that

⁸⁹USDA Foods are American grown and used in nutrition programs, including FDPIR. In fiscal year 2020, USDA purchased nearly 1.8 billion pounds of food, totaling about \$1.9 billion. For more information, see Ranalli, Dennis, Del Rosario, Katie, & Riley, Christina (2022). “State of Origin for USDA Foods in Fiscal Year 2020.” Prepared by the U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support and Food Distribution Division, Alexandria, VA. Available online at: <https://www.fns.usda.gov/usda-foods/state-origin-usda-foods>.

⁹⁰Under Titles IV and V of the Indian Self-Determination and Education Assistance Act of 1975, as amended, Tribes and tribal organizations may enter into “self-governance compacts” to assume administration of certain Department of Interior and Indian Health Service programs.

having to apply to USDA for modifications to the project leads to delays that could be ameliorated by compacts.

- **Expand authority to additional USDA programs.** According to representatives from one Tribe, expanding self-determination authority to additional USDA programs would help provide parity between the federal government and Tribes, while also noting that self-governance compacting provides an even better opportunity for Tribes in general. Similarly, USDA reported that Tribal Nations have unequivocally expressed their desire for this authority in USDA programs during tribal consultations in 2021 and 2022.
- **Reconsider funding process.** Representatives from one Tribe we interviewed said that the competitive process for the FDPIR Self-Determination Demonstration Project puts large Tribes in competition with smaller Tribes for limited funding, and Tribes have asked for a noncompetitive process, according to FNS officials. Tribal leaders also expressed concern during a recent consultation with USDA about whether funding would be continued after the demonstration project ends. In response, FNS stated that the demonstration project is a priority and it will use all available funding to offer Tribes predictability for the duration of the contract period.

Tribal representatives identified additional challenges implementing the demonstration project. Representatives from one Tribe said that USDA required the Tribe to commit to purchasing certain quantities of products from vendors a year in advance as part of USDA's application process for the demonstration project. Due to inflation, however, costs subsequently rose substantially, which cut into the Tribe's ability to be self-sustaining since the Tribe was locked into contracts that cost more than anticipated.⁹¹ Representatives also identified challenges around substituting Indigenous foods for those in the USDA food package. They said that because the Tribe can only replace existing USDA foods with a similar product, there is a gap for Indigenous foods without similar substitutes, like raw maple and sap that are culturally relevant for some tribal citizens.⁹²

In Fall 2023, FNS awarded a contract to evaluate the FDPIR Self-Determination Demonstration Project, recognizing the role that an evaluation plays in the future of the demonstration project.⁹³ According to USDA, the evaluation will allow FNS to better understand how Tribes and tribal organizations implemented their projects, as well as key successes, challenges, and lessons learned. FNS officials told us they estimate this evaluation will take about 3 years.

Conclusions

AI/AN populations have high rates of food insecurity and disproportionately suffer from diet-related diseases, poverty, and other challenges. Federal nutrition programs can help address food insecurity in tribal

⁹¹According to agency officials, FNS has provided additional technical assistance to Tribes participating in the demonstration project and opportunities to adjust the number of distribution months and budgets through contract modifications. Officials said FNS also provided support regarding the increased cost of foods due to inflation by recommending Tribes include an inflation factor in future budgets.

⁹²Tribal Organizations selected to participate in the demonstration project shall only purchase agricultural commodities that: are domestically produced; will supplant, not supplement, the type of agricultural commodities in the existing FDPIR food package; are of similar or higher nutritional value as the food(s) it is replacing in the existing food package; and meet any other criteria as determined by the Secretary of USDA. 87 Fed. Reg. 63,023 (Oct. 18, 2022).

⁹³The evaluation of the FDPIR Self-Determination Demonstration Project is part of FNS's broader FDPIR Participant Characteristics and Program Operation Study.

communities by increasing regular access to healthy food. Congress has historically supported tribal access to federal nutrition assistance programs, including enhancing tribal administration for FDPIR through specific USDA authority in the 2018 Farm Bill. For example, Tribes have the option to administer most FNS nutrition programs we reviewed.

However, because relevant laws for three of the programs—CACFP, SFSP, and TEFAP—do not provide for a tribal role in administration, it is unclear whether these programs serve tribal communities most effectively. Similarly, because relevant laws do not require state consultations with Tribes for most nutrition programs we reviewed, Tribes may lack the opportunity to engage in meaningful consultation with states on key nutrition programs that also serve their citizens and the broader communities.

USDA has committed in recent years to remove the unique barriers for Tribes to access its programs. Still, the ongoing challenges many tribal citizens and AI/AN households face in achieving food security point to the need for additional action. For one, data on food security for AI/AN populations are not widely available, which makes it difficult to understand the scope of food insecurity for the AI/AN population. Information on their participation in some federal nutrition programs is also known by USDA to be inaccurate due to the use of visual observation to identify race and ethnicity. By eliminating this practice, USDA could better assess whether programs are effectively reaching potentially eligible beneficiaries.

In addition, although USDA has taken some steps, Tribes reported continued obstacles to implementing FNS programs, including delays in verifying whether applicants can enroll in FDPIR, gaps in outreach by FNS, and staffing and infrastructure challenges that make it difficult to meet programs' administrative requirements. In the absence of steps such as assessing what additional flexibilities and changes could support tribal food security, Tribes will not have a full toolkit to address high levels of food insecurity in tribal communities.

Matter for Congressional Consideration

Congress should consider explicitly addressing in statute the role of Tribes in the administration of Food and Nutrition Service nutrition assistance programs, including specifying that states consult with Tribes when administering nutrition programs in tribal communities. (Matter for Consideration 1)

Recommendations for Executive Action

We are making the following six recommendations to USDA:

The Secretary of Agriculture should ensure that ERS includes available national-level American Indian/Alaska Native food security data in its flagship annual report on household food security. (Recommendation 1)

The Secretary of Agriculture should ensure that FNS eliminates the use of visual observation as an allowable means to determine participant race and ethnicity for the Food Distribution Program on Indian Reservations, Commodity Supplemental Food Program, and Special Supplemental Nutrition Program for Women, Infants, and Children. (Recommendation 2)

The Secretary of Agriculture should ensure that FNS improves the verification process for confirming that applicants are not dually participating in the Food Distribution Program on Indian Reservations and the

Supplemental Nutrition Assistance Program, per program requirements, so applicants can be enrolled in a timely fashion. For example, FNS could identify ways to facilitate appropriate communication and information sharing among relevant entities. (Recommendation 3)

The Secretary of Agriculture should ensure that FNS studies the impact of the prohibition against dual participation in the Food Distribution Program on Indian Reservations and the Supplemental Nutrition Assistance Program, including any obstacles to food security posed by the process for switching from one program to another, and shares the results of the study with Congress. (Recommendation 4)

The Secretary of Agriculture should ensure that FNS systematically identifies gaps in outreach to tribal communities about FNS programs, determines how to best address those gaps, and takes appropriate steps. (Recommendation 5)

The Secretary of Agriculture should ensure that FNS assesses the need for any additional flexibilities in its programs' administrative requirements that could further support tribal food security and any necessary adjustments to support existing flexibilities, and then implements those changes. (Recommendation 6)

Agency Comments

We provided a draft of this report to USDA for review and comment. USDA generally agreed with our recommendations, and for several said it already had actions underway to address them. Regarding the first recommendation, the agency noted that any inclusion of food security statistics for the AI/AN population would be dependent upon sample sizes and ensuring the statistics remain statistically reliable. As we note in the report, USDA officials considered these estimates to be reliable at the national level and these estimates are already published on the United States Department of Health and Human Services' Healthy People website. Also, regarding the fourth recommendation, USDA noted that any future study of the impact of the prohibition on dual participation in SNAP and FDPIR would be subject to availability of appropriations. We continue to believe that it is important to examine the impact of this prohibition, and USDA could consider cost-effective ways to approach the study. USDA also provided technical comments, which we incorporated as appropriate.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Agriculture, the Administrator of FNS, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or larink@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.



Kathryn A. Larin, Director

Letter

Education, Workforce, and Income Security Issues

Appendix I: Objectives, Scope, and Methodology

Our report examines (1) rates of food insecurity for the American Indian and Alaska Native (AI/AN) population and their participation in selected federal nutrition programs, (2) the food security challenges tribal communities face, (3) the extent to which selected federal nutrition programs address the unique needs of tribal communities, and (4) the role of Tribes in administering selected federal nutrition programs.¹ In addition to the methods discussed below, to address all four research objectives we reviewed relevant federal laws, and USDA regulations and guidance.

We reviewed the following nine federal nutrition programs administered at the federal level by the U.S. Department of Agriculture (USDA)'s Food and Nutrition Service (FNS):

- Child and Adult Care Food Program (CACFP),
- Commodity Supplemental Food Program (CSFP),
- Food Distribution Program on Indian Reservations (FDPIR),
- Senior Farmers' Market Nutrition Program (SFMNP),
- Special Supplemental Nutrition Program for Women, Infants, and Children (WIC),
- Summer Food Service Program (SFSP),
- Supplemental Nutrition Assistance Program (SNAP),
- The Emergency Food Assistance Program (TEFAP), and
- WIC Farmers' Market Nutrition Program (FMNP).

This list is not exhaustive of all FNS nutrition programs that are available to Tribes. We excluded nutrition programs that are administered through school food authorities—typically, school districts that operate school meal programs locally under agreements with state agencies—due to their additional layer of administration. These programs include the National School Lunch Program and School Breakfast Program. For a complete list of FNS nutrition programs, see [FNS Nutrition Programs | Food and Nutrition Service \(usda.gov\)](https://www.usda.gov/food-nutrition-service/fns-nutrition-programs).

Data

To address the first objective, we obtained household food insecurity estimates from the U.S. Department of Health and Human Services' (HHS) Healthy People website.² USDA's Economic Research Service (ERS) partners with the U.S. Census Bureau (Census) to add its food security supplement to Census's Current

¹For the purposes of this report, we are defining tribal communities to include individuals living on tribal lands, which include reservations, the Creek Oklahoma Tribal Statistical Area, Alaska Native Village Statistical Areas, and American Indian Trust Lands.

²Estimates from 2011 to 2018 are obtained from HealthyPeople.gov, NWS-13 Households with food insecurity in the past 12 months (percent), <https://wayback.archive-it.org/5774/20211119164338/HTTPS://WWW.HEALTHYPEOPLE.GOV/2020/DATA-SEARCH/SEARCH-THE-DATA?NID=4936>. Estimates from 2019 to 2022, the most recent data available, are obtained from Healthy People 2030, NWS-01 Reduce household food insecurity and hunger, <https://health.gov/healthypeople/objectives-and-data/browse-objectives/nutrition-and-healthy-eating/reduce-household-food-insecurity-and-hunger-nws-01/data>.

Population Survey in December of each year.³ ERS officials stated that they derive food insecurity estimates from this survey and provide such estimates to HHS to be published on its Healthy People website. Based on our review of these data and interviews with ERS staff, we found the data to be sufficiently reliable for the purpose of presenting the trend of AI/AN food insecurity over time.

We also analyzed metrics correlated with food security in the five states where we conducted site visits, including income level, SNAP participation rates, poverty rates, and unemployment rates. To provide context for the first objective, we obtained estimates of these metrics for the AI/AN population and total population per state from Census's American Community Survey 2018–2022 five-year estimates, the most recent data available. Based on our review of Census documentation, we determined these data were sufficiently reliable for the purpose of providing contextual information for food insecurity for the AI/AN population for these states.

To provide context for the fourth objective, we obtained participation data from FNS for each of our selected FNS nutrition programs that are administered by Tribes or tribal organizations, from 2011–2022 to the extent available.⁴ These programs include CSFP, FDPIR, WIC, FMNP, and SFMNP. Based on our review of these data and written responses from FNS, we found the data to be sufficiently reliable for the purpose of providing contextual information on the level of participation of tribally administered federal nutrition programs discussed in the report. It is important to note that not all participants in tribally administered programs are tribal citizens and some tribal citizens participate in federal nutrition programs through states, so the data presented in appendix III cannot be used as a proxy for tribal participation in these programs.

Tribal Site Visits and Interviews

To help inform objectives 2, 3, and 4, we conducted site visits to seven Tribes and two tribal organizations in five states—Alaska, North Dakota, Nevada, Oklahoma, and Washington from March to June 2023. We met with tribal leaders and representatives that were involved in the administration of our selected federal nutrition programs. We also conducted virtual interviews with representatives of two additional Tribes in Michigan and Wisconsin.⁵

We selected Tribes to reflect diversity across various factors, including geographic region; population size; unique food security factors, such as water scarcity and rurality; and experience administering our selected federal nutrition programs. For example, we met with Tribes that administer selected programs, such as FDPIR, WIC, and CSFP to learn about their experiences with program administration, as well as Tribes that do not administer these programs. We also interviewed Tribes and a tribal organization that administer USDA's FDPIR Self-Determination Demonstration Project, authorized under the 2018 Farm Bill. Because we relied on

³USDA ERS, Food Security in the U.S. - History & Background. <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-u-s/history-background/#CPS>.

⁴Specifically, data on FDPIR are from FNS National Bank Version 8.2, form FNS-152. Data on CSFP are from FNS National Bank Version 8.2, form FNS-153. Data on WIC are from WIC Participant and Program Characteristics Report in 2012, 2014, 2016, 2018, 2020 and 2022. Data on FMNP and SFMNP are from FNS National Data Bank Version 8.2. Data from 2022 were the most recent data available at the time of our request.

⁵We visited or virtually interviewed representatives from the following Tribes and tribal organizations: Alaska Native Tribal Health Consortium, Native Village of Eyak, and Native Village of Nanwalek (Alaska); Little Traverse Bay Bands of Odawa Indians (Michigan); Walker River Paiute Tribe (Nevada); Spirit Lake Tribe and Turtle Mountain Band of Chippewa (North Dakota); Muscogee (Creek) Nation and Osage Nation (Oklahoma); Small Tribes Organization of Western Washington (Washington); and Oneida Nation (Wisconsin).

a nongeneralizable sample of Tribes, the views of those we interviewed do not represent the views of all Tribes with respect to experiences with the selected federal nutrition assistance programs.

Additional Interviews

To inform our research objectives, we interviewed officials from the national offices of USDA's Food and Nutrition Service, Office of Tribal Relations, and Economic Research Service. To obtain additional information about tribal administration of our selected nutrition programs, we also interviewed officials in each FNS regional office (six) that have Tribes that administer FNS programs in the region.⁶ We also interviewed officials from the U.S. Census Bureau to obtain information on the food security supplement it administers as part of its Current Population Survey, the source of the national food insecurity estimates described above.

To obtain information on how states administer federal nutrition programs in tribal communities, we also interviewed officials from seven state agencies, including state departments of health, education, and human services, in three states we visited. For additional context, we interviewed representatives from five stakeholder organizations involved in research or advocacy around nutrition assistance to tribal communities, including the Indigenous Food and Agriculture Initiative, Intertribal Agriculture Council, Native American Agriculture Fund, Food Research & Action Center, and Feeding America.

⁶FNS officials told us its Mid-Atlantic Regional Office does not have any Tribes that directly administer FNS programs.

Appendix II: State-Level Metrics Correlated with Food Security for Selected States

According to our analysis of 2018–2022 5-year American Community Survey (ACS) data, the most recent period for which AI/AN estimates were available, we found that the AI/AN population generally fared worse than the total population of the state (see table 2).¹ For example, in Alaska, the estimated median household income for AI/AN households was \$56,139, while it was \$86,370 for all the households in the state. In Washington, SNAP participation rates for AI/AN households in the past 12 months are about twice that of the state total. Further, in North Dakota the poverty rate estimate for the AI/AN population was 31.6 percent, nearly triple that of the overall state.

Table 2: Five-year Estimates of Metrics Correlated with Food Security by Selected States, 2018–2022

Category	Median household income ^a	Percent of households receiving food stamps/SNAP benefits in the past 12 months	Percent of people below poverty level in the past 12 months	Unemployment rate ^b
US Total	\$75,149	11.5%	12.5%	5.3%
Margin of Error (MOE)/Percent MOE	±152	±0.1	±0.1	±0.1
AI/AN total	\$55,925	22.9%	22.6%	8.5%
MOE/Percent MOE	±475	±0.3	±0.2	±0.2

Category	Median household income ^a	Median household income ^a	Percent of households receiving food stamps/SNAP benefits in the past 12 months	Percent of households receiving food stamps/SNAP benefits in the past 12 months	Percent of people below poverty level in the past 12 months	Percent of people below poverty level in the past 12 months	Unemployment rate ^b	Unemployment rate ^b
State	State	AI/AN	State	AI/AN	State	AI/AN	State	AI/AN
Alaska	\$86,370	\$56,139	10.5%	32.7%	10.5%	23.2%	6.4%	15.8%
MOE/Percent MOE	±1,083	±1,959	±0.4	±1.5	±0.5	±1.2	±0.3	±1.0
Nevada	\$71,646	\$55,913	11.9%	18.0%	12.7%	20.5%	7.0%	8.4%
MOE/Percent MOE	±495	±2,878	±0.2	±2.2	±0.2	±1.7	±0.2	±1.4
North Dakota	\$73,959	\$43,816	6.3%	24.1%	10.8%	31.6%	2.9%	8.7%

¹These metrics are related to food security but are not substitutes for food security data. For example, although estimates of poverty could be used to provide context for food insecurity, many food-insecure families have incomes above the poverty threshold. U.S. Department of Agriculture (USDA), Economic Research Service, *Household Food Security in the United States in 2022* (Washington, D.C.: Oct. 2023). Note that American Community Survey provides estimates of some of these indicators for some tribal areas. However, some estimates may not be precise given the small sample size of some tribal areas.

Appendix II: State-Level Metrics Correlated with Food Security for Selected States

Category	Median household income ^a	Median household income ^a	Percent of households receiving food stamps/SNAP benefits in the past 12 months	Percent of households receiving food stamps/SNAP benefits in the past 12 months	Percent of people below poverty level in the past 12 months	Percent of people below poverty level in the past 12 months	Unemployment rate ^b	Unemployment rate ^b
State	State	AI/AN	State	AI/AN	State	AI/AN	State	AI/AN
MOE/Percent MOE	±1,131	±4,023	±0.3	±2.6	±0.4	±2.3	±0.2	±1.9
Oklahoma	\$61,364	\$55,468	13.0%	18.2%	15.2%	19.2%	4.9%	6.6%
MOE/Percent MOE	±451	±1,004	±0.2	±0.6	±0.2	±0.7	±0.1	±0.4
Washington	\$90,325	\$64,058	11.1%	25.2%	9.9%	19.3%	5.0%	8.4%
MOE/Percent MOE	±433	±2,977	±0.2	±1.6	±0.2	±1.4	±0.1	±1.0

Source: 2018–2022 American Community Survey 5-year estimates from the U.S. Census. | GAO-24-106218

Note: The AI/AN population includes individuals who identify themselves as American Indians or Alaska Natives only, as opposed to those who identify themselves as having more than one race, including American Indian or Alaska Native.

^aEstimates of median household income are measured in 2022 dollars.

^bUnemployment rates are estimated for individuals 16 years and older.

Appendix III: Tribes and Tribal Organization Nutrition Program Participation Data

For federal nutrition programs that may be administered by Tribes or tribal organizations, FNS collects participation data by Tribe or tribal organization.¹ Table 3 below shows the number of participants and the number of Tribes and tribal organizations administering selected federal nutrition programs. It is important to note that not all participants in the tribally administered programs are tribal citizens and some tribal citizens participate in federal nutrition programs through states, so the data presented below cannot be used as a proxy for the extent of tribal participation in these programs.

Table 3 shows that compared to pre-pandemic, average monthly participants of tribally administered FDPIR decreased substantially in fiscal year (FY) 2021 and FY 2022. FNS officials said this decrease may be explained by families enrolled in FDPIR switching to SNAP when Congress enacted legislation that temporarily increased SNAP benefits. Participation in tribally administered CSFP increased in the past three years as more Tribes and tribal organizations started to administer the program. WIC participation through Tribes or tribal organizations has been declining over the past decade, but there has been an increase in the participation of tribally administered FMNP and SFMNP since FY 2021. According to FNS officials, in FY 2022, two Tribes transitioned from using paper-based coupons to an electronic benefit transfer system for both FMNP and SFMNP, making participation in these programs easier.

Table 3: Total Tribes and Tribal Organization Participation in Selected Food and Nutrition Service (FNS) Nutrition Programs

Program	Fiscal year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Food Distribution Program on Indian Reservations (FDPIR)	Average Monthly Participants	72,482	71,091	70,176	78,679	81,819	85,686	83,797	81,197	77,986	69,356	44,218	41,355
Food Distribution Program on Indian Reservations (FDPIR)	Number of Tribes and tribal organizations	101	101	101	100	100	101	102	102	102	102	104	104
Commodity Supplemental Food Program (CSFP)	Average Monthly Participants	683	750	706	664	588	551	559	549	570	957	909	1,452

¹Data and reports provided by USDA use the term ITO; however, FNS has noted that there is not a single definition of ITO that applies across its federal nutrition programs. Therefore, for the purposes of this appendix, we use the phrase Tribes and tribal organizations.

Appendix III: Tribes and Tribal Organization Nutrition Program Participation Data

Program	Fiscal year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Commodity Supplemental Food Program (CSFP)	Number of Tribes and tribal organizations	2	2	2	2	2	2	2	3	4	5	6	7
Special Supplemental Nutrition Program For Women, Infants, and Children (WIC)	Participants in April		69,595		64,802		64,694		59,284		53,424		47,173
Special Supplemental Nutrition Program For Women, Infants, and Children (WIC)	Number of Tribes and tribal organizations		34		34		34		34		33		33
WIC Farmers' Market Nutrition Program (FMNP)	Annual Participants	8,851	8,289	7,581	7,544	7,953	8,205	7,777	8,193	7,750	7,104	7,173	11,428
WIC Farmers' Market Nutrition Program (FMNP)	Number of Tribes and tribal organizations	6	6	6	6	6	6	6	6	6	6	6	6
Senior Farmers' Market Nutrition Program (SFMNP)	Annual Participants	7,088	7,021	6,749	7,432	6,804	6,955	6,992	8,958	8,336	5,259	7,303	8,865
Senior Farmers' Market Nutrition Program (SFMNP)	Number of Tribes and tribal organizations	7	7	7	7	8	8	8	8	8	9	9	9

Source: FDPIR: FNS National Bank Version 8.2, form FNS-152. CSFP: FNS National Bank Version 8.2, form FNS-153. WIC: WIC Participant and Program Characteristics Report in 2012, 2014, 2016, 2018, 2020 and 2022. FMNP: FNS National Data Bank Version 8.2. SFMNP: FNS National Data Bank Version 8.2. | GAO-24-106218

Notes: A participant for WIC is defined as a person who was certified to receive WIC benefits in April of each reference year. For SFMNP, participants must be not less than 60 years of age, except that State agencies may exercise the option to deem Native Americans who are 55 years of age or older as categorically eligible for SFMNP benefits. Therefore, these data reflect tribally administered SFMNP participation of seniors both below and above 60 years of age.

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

In addition to the contact above, Scott Spicer (Assistant Director), Avani Locke (Analyst-in-Charge), Dan Luo, Sandra Mansour, Layla Moughari, and Eve Weisberg made key contributions to this report. Also contributing to this report were Edward Bodine, Estelle Bowman, Charlotte Cable, Rebecca Gertler, Joel Green, Jean McSween, Mimi Nguyen, Anna Maria Ortiz, Leslie Pollock, Rebecca Sero, Almeta Spencer, William Stupski, Lisa Van Arsdale, and Adam Wendel.

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