

## Appendix V: Using the Guide to Identify, Assess, and Make Recommendations to Reduce or Better Manage Fragmentation, Overlap, and Duplication in Domestic Food Assistance Programs

We applied this guide for assessing fragmentation, overlap, and duplication in federal programs to GAO’s 2010 work on federal food and nutrition assistance.<sup>46</sup> GAO’s 2010 report evaluated the implications of providing food and nutrition assistance through multiple programs and agencies. The U.S. Department of Agriculture (USDA) administered most of these programs, including the five largest: the Supplemental Nutrition Assistance Program (SNAP); the National School Lunch Program (NSLP); the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC); the Child and Adult Care Food Program; and the School Breakfast Program. USDA also monitored the prevalence of food insecurity (that is, the percentage of U.S. households that were unable to afford enough food some-time during the year). Other federal agencies, including the Department of Health and Human Services (HHS) and the Department of Homeland Security’s (DHS) Federal Emergency Management Agency (FEMA), also funded food assistance programs. Further, federal food assistance is provided through a decentralized system that involves multiple federal, state, and local organizations.

To complete its 2010 work, GAO compiled a comprehensive list of food and nutrition assistance programs in the United States and evaluated these programs for fragmentation, overlap, and duplication. In this appendix, we summarized the findings, conclusions, and recommendations of the 2010 report to illustrate how analysts and decision makers can apply the guide steps to assess programs for fragmentation, overlap, duplication, and other inefficiencies. Table 15 summarizes the results of this work.

**Table 15: GAO’s Fragmentation, Overlap, and Duplication Review of Domestic Food and Nutrition Assistance Programs, Summary of Key Findings by Step**

Guide step	Summary of key findings
Step 1: Identify Fragmentation, Overlap, and Duplication	<ul style="list-style-type: none"> <li>GAO used key benefits, services, or products and goals and/or outcomes to identify programs.</li> <li>GAO identified 18 programs to include in its fragmentation, overlap, and duplication review.</li> <li>GAO found that the federal food assistance structure showed signs of program overlap and inefficiencies—for example, some programs provided comparable benefits to similar populations but were managed separately, and overlapping eligibility requirements created duplicative work for providers and applicants.</li> </ul>
Step 2: Identify the Potential Effects of Fragmentation, Overlap, and Duplication	<ul style="list-style-type: none"> <li>GAO found evidence of both positive and negative effects of the overlap related to implementation and outcomes and impacts.</li> <li>GAO also found negative effects of the overlap related to cost-effectiveness.</li> </ul>
Step 3: Validate Effects and Assess and Compare Federal Efforts	<ul style="list-style-type: none"> <li>GAO found relevant and sound research on 7 of the 18 programs included in its fragmentation, overlap, and duplication review.</li> <li>GAO also found that little was known about the effectiveness of the remaining 11 programs included in its fragmentation, overlap, and duplication review because they had not been well studied.</li> </ul>
Step 4: Identify Options to Increase Efficiency and Reduce or Better Manage Fragmentation, Overlap, and Duplication	<ul style="list-style-type: none"> <li>GAO outlined what steps USDA has taken to address inefficiencies and overlap and made recommendations on what additional steps the agency can take to reduce the negative effects of overlap among food and nutrition assistance programs.</li> <li>In addition, GAO acknowledged trade-offs associated with consolidating overlapping programs.</li> </ul>

Source: GAO. | GAO-15-49SP

<sup>46</sup>See 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).

## Step 1: Identify Fragmentation, Overlap, and Duplication

### 1.1 Identify an approach for selecting programs for a fragmentation, overlap, and duplication review.

GAO used key benefits, services, or products and goals or outcomes to identify programs for its fragmentation, overlap, and duplication review. Specifically, GAO defined the scope of its review to include only federal programs that focus primarily on providing or supporting food and nutrition assistance in the United States.

### 1.2 Identify programs to examine for fragmentation, overlap, and duplication.

To identify programs, GAO reviewed the following:

- Program inventories, catalogs, or databases (Catalog of Federal Domestic Assistance).
- Legal information (relevant federal laws and regulations, including the Food, Conservation, and Energy Act of 2008, and the Child Nutrition and WIC Reauthorization Act of 2004).
- Agency information (including relevant agency websites).

In addition, GAO conducted original research (interviewed federal officials).

Based on this work, GAO identified 70 potential food and nutrition-related programs.

Next, GAO consulted existing sources of information and conducted original research to refine the list of 70 programs to include those that did one of following:

- Mentioned food or nutrition assistance in their Catalog of Federal Domestic Assistance profile or on the administering agency's website.
- Allowed funds to be used to build the infrastructure within or the coordination across food and nutrition assistance programs.

GAO then excluded any programs that met one or more of the following:

- Food and nutrition assistance was not the primary objective of the program but was one of multiple support services.
- Program did not exist or was not funded in fiscal year 2008.
- Program provided fungible funds to states or individuals that may have been used for, but were not required to be spent on, the purchase of food.
- Program supported infrastructure costs that supported a range of programs or a facility, which could include, but was not limited to, food and nutrition assistance-related functions.
- Dedicated funding stream that supported a program or a component of a food assistance program already included in GAO's review.
- Federal efforts that processed or delivered food to organizations that administer food and nutrition assistance programs, such as the food distribution and price support functions of USDA's Farm Service Agency.
- Program funds were directed toward research or nutritional education or outreach only.

Based on this work, GAO identified 18 programs to include in its fragmentation, overlap, and duplication review.

Figure 5 outlines the programs that GAO included and excluded in its review.

**Figure 5: Programs Included and Excluded from GAO’s April 2010 Fragmentation, Overlap, and Duplication Review of Food and Nutrition Assistance Programs**

Program	Agency/office	Included	Inclusion criteria		Exclusion criteria									
			Mentions food assistance or nutrition in program description	Money for infrastructure or coordination of food and nutrition assistance	Funding is for research, education, or counseling only	Funding is fungible with-out required food spending	USDA commodity processing and distribution	Food and nutrition assistance is not the primary objective	Infrastructure spending is for multiple types of facilities or multipurpose food and nutrition	Was not funded or did not exist in fiscal year 2008	Is a funding stream or component of another program			
Child and Adult Care Food Program	USDA-Food and Nutrition Service (FNS)	Yes	✓											
Commodity Supplemental Food Program	USDA-FNS	Yes	✓											
Community Food Projects Competitive Grants Program	USDA-National Institute of Food and Agriculture (NIFA)	Yes	✓	✓										
Food Distribution Program on Indian Reservations	USDA-FNS	Yes	✓											
Fresh Fruit and Vegetable Program	USDA-FNS	Yes	✓											
NSLP	USDA-FNS	Yes	✓											
Nutrition Assistance for Puerto Rico	USDA-FNS	Yes	✓											
School Breakfast Program	USDA-FNS	Yes	✓											
Senior Farmers’ Market Nutrition Program	USDA-FNS	Yes	✓											
Special Milk Program	USDA-FNS	Yes	✓											
Summer Food Service Program	USDA-FNS	Yes	✓											
SNAP	USDA-FNS	Yes	✓											
The Emergency Food Assistance Program	USDA-FNS	Yes	✓											
WIC	USDA-FNS	Yes	✓											

Source: GAO. | GAO-15-49SP

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Program	Agency/office	Included	Inclusion criteria				Exclusion criteria					
			Mentions food assistance or nutrition in program description	Money for infrastructure or coordination of food and nutrition assistance	Funding is for research, education, or counseling only	Funding is for research, out required food processing	USDA commodity, with-processing and distribution	Food and nutrition assistance is not the primary objective	Infrastructure spending is for multiple types of facilities, or multiple-purpose food and nutrition	Was not funded or did not exist in fiscal year 2008	Is a funding stream or component of another program	
WIC Farmers' Market Nutrition Program	USDA-FNS	Yes	✓									
Emergency Food and Shelter National Board Program	DHS-FEMA	Yes	✓	✓								
Elderly Nutrition Program: Home-Delivered and Congregate Nutrition Services	HHS-Administration on Aging (AOA)	Yes	✓									
Grants to American Indian, Alaska Native, and Native Hawaiian Organizations for Nutrition and Supportive Services	HHS-AOA	Yes	✓									
Programs excluded from the review												
Foster Grandparent Program	Corporation for National and Community Service (CNCS)	No	✓			✓		✓				
Retired and Senior Volunteer Program	CNCS	No	✓			✓		✓				
Senior Companion Program	CNCS	No	✓			✓		✓				
Volunteers in Service to America	CNCS	No	✓			✓		✓				
Family Subsistence Supplemental Allowance	Department of Defense (DOD)	No	✓			✓						
Basic Center Grant	HHS-Administration for Children and Families (ACF)	No		✓				✓				
Community Services Block Grant	HHS-ACF	No	✓	✓		✓		✓				
Head Start	HHS-ACF	No	✓			✓		✓				
Social Services Block Grant	HHS-ACF	No		✓		✓						
Nutrition Services Incentive Program	HHS-AOA	No	✓									✓
Special Programs for the Aging - Title III.B Supportive Services and Senior Centers Program	HHS-AOA	No		✓		✓		✓				

Source: GAO. | GAO-15-49SP

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Program	Agency/office	Included	Inclusion criteria			Exclusion criteria						
			Mentions food assistance or nutrition in program description	Money for infrastructure or coordination of food and nutrition assistance	Funding is for research, education, or counseling only	Funding is for research our required food counseling	USDA is fungible with processing and spending	Food and nutrition assistance is not the primary objective	Infrastructure spending is for multiple types of facilities or multipurpose food and nutrition	Was not funded or did not exist in fiscal year 2008	Is a funding stream or component of another program	
Healthy Communities Program	HHS-Centers for Disease Control and Prevention	No	✓		✓	✓						
Medical Nutrition Therapy	HHS-Centers for Medicare & Medicaid Services	No	✓		✓							
Emergency Shelter Grants Program	HUD-Office of Community and Planning Development (OCPD)	No		✓				✓	✓			
Housing Opportunities for Persons with AIDS	HUD-OCPD	No	✓					✓	✓			
Assisted Living Conversion for Eligible Multifamily Housing Projects	HUD-Office of the Federal Housing Commissioner	No		✓					✓			
Cooperative Extension Service	USDA-NIFA	No	✓	✓	✓							
Expanded Food and Nutrition Education Program	USDA-NIFA	No	✓		✓							
SNAP Outreach/ Participation Program	USDA-FNS	No	✓	✓								✓
WIC Grants to States	USDA-FNS	No	✓	✓								✓
Child Nutrition Discretionary Grants Limited Availability	USDA-FNS	No	✓	✓								✓
DOD Fresh Fruit and Vegetable Program	DOD	No	✓				✓					
Food Assistance and Nutrition Research Programs	USDA-Economic Research Service	No	✓		✓							
FNS Disaster Assistance	USDA-FNS	No	✓									✓
National Nonprofit Humanitarian Initiative	USDA	No	✓							✓		
Nutrition Assistance Program: American Samoa	USDA-FNS	No	✓			✓						✓
Nutrition Assistance Program: Northern Marianas Islands	USDA-FNS	No	✓			✓						✓

Source: GAO. | GAO-15-49SP

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Program	Agency/office	Included	Inclusion criteria				Exclusion criteria				
			Mentions food assistance or nutrition in program description	Money for infrastructure or coordination of food and nutrition assistance	Funding is for research, education, or counseling only	Funding is fungible, with-out required food spending	USDA commodity processing and distribution	Food and nutrition assistance is not the primary objective	Infrastructure spending is for multiple types of facilities or multipurpose facilities that may include food and nutrition	Was not funded or did not exist in fiscal year 2008	Is a funding stream or component of another program
Nutrition Education and Training	USDA	No	✓		✓					✓	
State Administrative Expenses for Child Nutrition	USDA-FNS	No	✓	✓							✓
State Administrative Matching Grants for SNAP	USDA-FNS	No	✓								✓
Team Nutrition Initiative Grants	USDA-FNS	No	✓		✓						
TEFAP Administrative Costs	USDA-FNS	No	✓								✓
Dairy Product Price Support Program	USDA-Farm Service Agency	No	✓				✓				
Community Facilities Loans and Grants	USDA-Rural Development	No		✓					✓		
Veterans State Adult Day Health Care	Department of Veterans Affairs	No	✓					✓			
2008 Farm Bill programs excluded from the review											
Healthy Incentives Pilot	USDA	No	✓							✓	✓
Emergency Food Program Infrastructure Grants	USDA	No	✓	✓						✓	
Hunger Free Communities Grants	USDA	No	✓	✓						✓	
American Recovery and Reinvestment Act of 2009 funding streams excluded from the review											
Home-Delivered Nutrition Services	HHS-AOA	No	✓							✓	
Nutrition Services for Native Americans	HHS-AOA	No	✓							✓	
Congregate Nutrition Services	HHS-AOA	No	✓							✓	
The Emergency Food and Shelter National Board Program	DHS-FEMA	No	✓							✓	
Community Services Block Grant	HHS-ACF	No	✓	✓		✓				✓	

Source: GAO. | GAO-15-49SP

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**1.3 Gather background information on the identified programs.**

- GAO reviewed existing documentation, such as relevant federal laws and agency websites, and conducted original research, such as interviews with agency officials, to gather background information on the identified programs.

Table 16 provides background information on 2 of the 18 programs GAO included in its fragmentation, overlap, and duplication review.

**Table 16: Examples of Background Information Collected for SNAP and NSLP**

Background information <sup>a</sup>	SNAP	NSLP
Program origin and history	The Food Stamp Act of 1964, as amended, and corresponding legislative history	The National School Lunch Act, as amended, and corresponding legislative history
Committees of jurisdiction	House Committee on Agriculture; Senate Committee on Agriculture, Nutrition, and Forestry	House Committee on Agriculture; Senate Committee on Agriculture, Nutrition, and Forestry
Budget functional classification or activity line	Function 600: Income Security	Function 600: Income Security
Current-year appropriation or funding allocation <sup>b</sup>	N/A	N/A
Administering agency and relevant offices, bureaus, and departments within the agency	USDA's Food and Nutrition Service	USDA's Food and Nutrition Service
Administrative structure/program operations (including field office and subcontractor locations and funding channels and mechanisms)	State agencies administer SNAP.  Benefits are provided to households through electronic debit cards for food purchase in participating retail stores.	State agencies administer NSLP.  Cash grants are provided to local providers (schools) for meals and snacks served.
Purpose, goals, and activities performed	Improve the nutrition levels of low-income households by ensuring access to nutritious, healthful diets through the provision of nutrition education and nutrition assistance through the issuance of monthly benefits for the purchase of food at authorized retailers.	To assist states, through cash grants and food donations, in providing a nutritious nonprofit lunch service for school children and to encourage the domestic consumption of nutritious agricultural commodities.
Intended beneficiaries or customers	Individuals and households: Low-income households with gross income at or below 130 percent of the federal poverty level or net income at or below 100 percent of the poverty level and with limited resources.	Children: School children of high school grades and younger. Students from families with incomes below 130 percent of the federal poverty level (or from families receiving SNAP) qualify for free meals, and students from families with incomes below 185 percent of the federal poverty level qualify for reduced-price meals.

Source: GAO analysis. | GAO-15-49SP

<sup>a</sup>The information presented in this table is not exhaustive. It is only meant to illustrate the types of background information an analyst might collect as part of a fragmentation, overlap, and duplication review.

<sup>b</sup>These data were not available in [GAO-10-346](#). Collecting these data was not within the scope of the work conducted for this report.

**1.4 Determine whether fragmentation, overlap, or duplication exists among the selected programs.**

GAO found that the federal food assistance structure—with its 18 programs—showed signs of program overlap, which can create unnecessary work and waste administrative resources, creating inefficiency. Program overlap occurs when multiple programs have comparable benefits going to similar target populations, which is not uncommon within programs that are administered by multiple agencies and local providers. The scope of GAO’s work did not allow it to gather enough information to discuss the level of overlap or the extent of administrative inefficiencies among food and nutrition assistance programs at a national level. However, GAO’s review included examples of overlap and inefficiencies occurring in selected states, such as the following:

- *Some programs provided comparable benefits to similar populations and were managed separately—a potentially inefficient use of federal funds.* While the programs in the study did not exactly duplicate each others’ services, some provided comparable benefits to similar target populations. This overlap may have been in part because they were created separately to meet various needs.
- *Overlapping eligibility requirements created duplicative work for providers and applicants.* According to GAO’s previous work and officials interviewed for the 2010 report, overlapping program rules related to determining eligibility often require local providers to collect similar information—such as an applicant’s income and household size—multiple times because this information is difficult to share, partly due to concerns for safeguarding individuals’ confidentiality but also due to incompatible data systems across programs. In addition, some of these rules often required applicants who sought assistance from multiple programs to submit separate applications for each program and provide similar information verifying, for example, household income.

Table 17 highlights similarities and differences in the background information collected on 2 of the 18 programs GAO included in its fragmentation, overlap, and duplication review. These similarities and differences are indicators of potential fragmentation, overlap, or duplication between the programs.

**Table 17: Examples of Similarities and Differences between SNAP and NSLP**

Background Information <sup>a</sup>	SNAP	NSLP
Program origin and history	The Food Stamp Act of 1964, as amended, and corresponding legislative history	The National School Lunch Act, as amended, and corresponding legislative history
Committees of jurisdiction	House Committee on Agriculture; Senate Committee on Agriculture, Nutrition, and Forestry	House Committee on Agriculture; Senate Committee on Agriculture, Nutrition, and Forestry
Budget functional classification or activity line	Function 600: Income Security	Function 600: Income Security
Current-year appropriation or funding allocation <sup>b</sup>	N/A	N/A
Administering agency and relevant offices, bureaus, and departments within the agency	USDA’s Food and Nutrition Service	USDA’s Food and Nutrition Service
Administrative structure/program operations (including field office and subcontractor locations and funding channels and mechanisms)	State agencies administer SNAP. Benefits are provided to households through electronic debit cards for food purchase in participating retail stores.	State agencies administer NSLP. Cash grants are provided to local providers (schools) for meals and snacks served.
Purpose, goals, and activities performed	Improve the nutrition levels of low-income households by ensuring access to nutritious, healthful diets through the provision of nutrition education and nutrition assistance through the issuance of monthly benefits for the purchase of food at authorized retailers.	To assist states, through cash grants and food donations, in providing nonprofit service of nutritious lunches for school children and to encourage the domestic consumption of nutritious agricultural commodities.
Intended beneficiaries or customers	Individuals and households: Low-income households with gross income at or below 130 percent of the federal poverty level or net income at or below 100 percent of the poverty level and with limited resources.	Children: School children of high school grades and younger. Students from families with incomes below 130 percent of the federal poverty level (or from families receiving SNAP) qualify for free meals, and students from families with incomes below 185 percent of the federal poverty level qualify for reduced price meals.

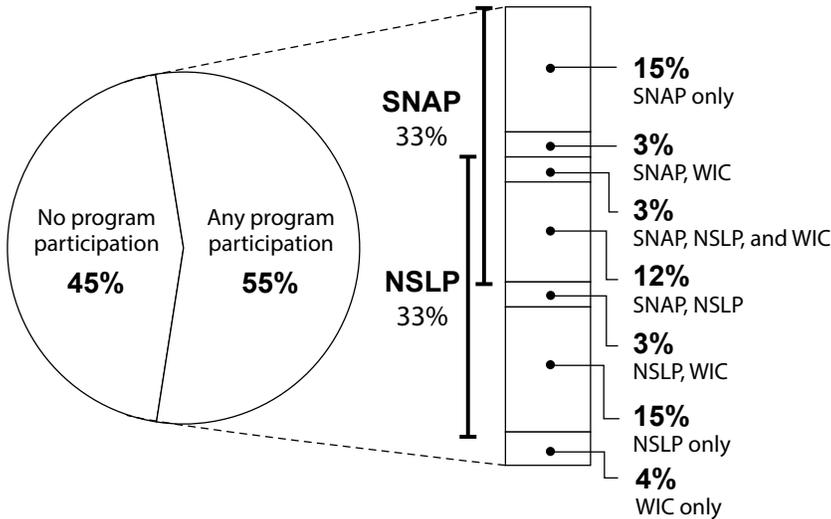
Source: GAO analysis. | GAO-15-49SP

<sup>a</sup>The information presented in this table is not exhaustive. It is only meant to illustrate the types of background information an analyst might collect as part of a fragmentation, overlap, and duplication review.

<sup>b</sup>These data were not available in GAO-10-346. Collecting these data was not within the scope of the work conducted for this report.

Figure 6 illustrates signs of overlap in food and nutrition assistance programs as some low-income households participated in more than one program. USDA data indicated that a small portion of food insecure households received assistance from more than one of the primary food assistance programs. According to USDA, of the food insecure, low-income households, only about 3 percent participated in all of the three largest programs—SNAP, NSLP, and WIC. Additionally, 12 percent participated in both SNAP and the NSLP, about 15 percent participated in only SNAP, and another 15 percent participated in only the NSLP.

**Figure 6: Program Participation of Low-Income Households with Low or Very Low Food Security, 2007-2008**



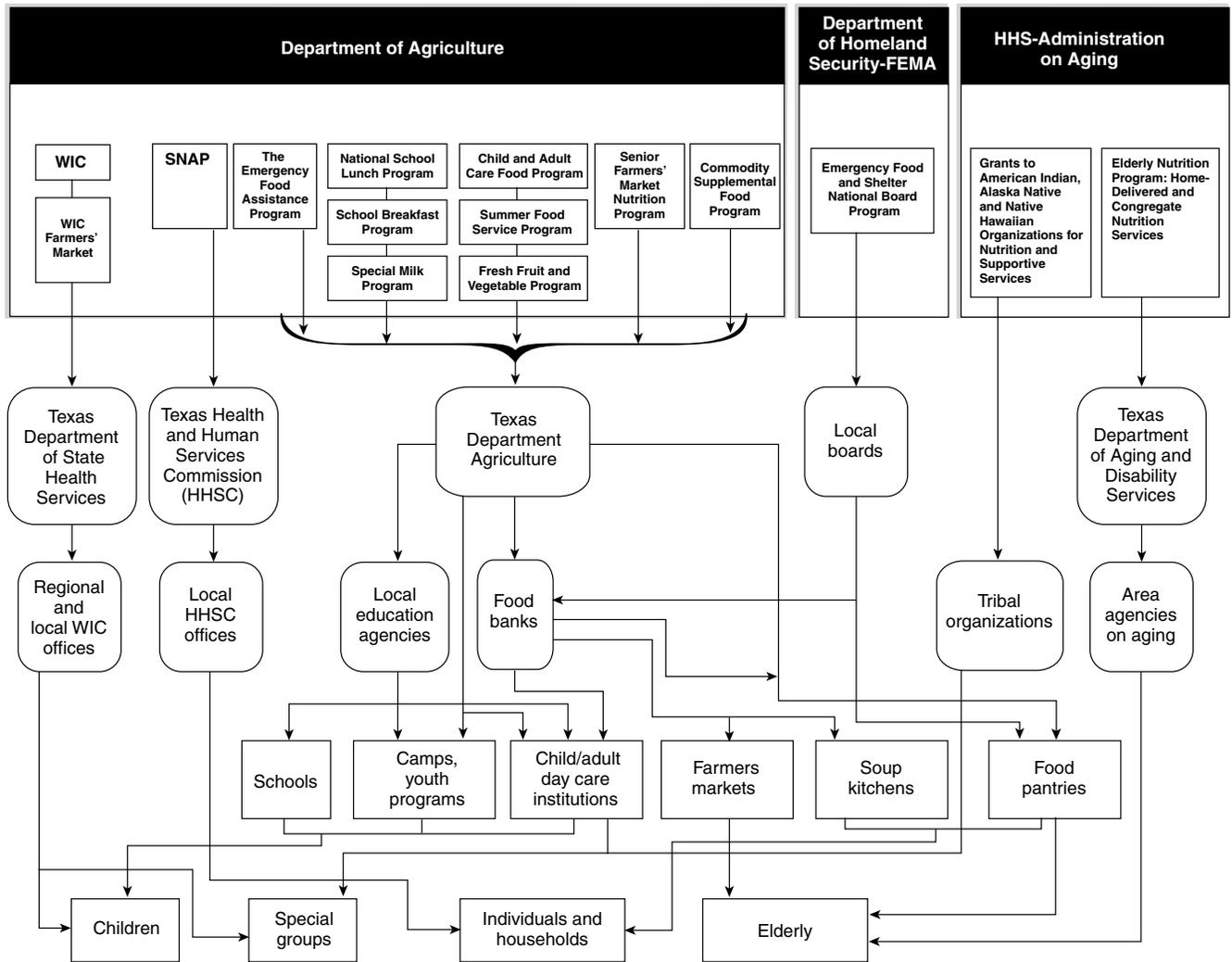
Source: GAO presentation of unofficial special tabulations provided by the Economic Research Service, USDA, using data from December 2007 and December 2008 Current Population Survey Food Security Supplements. | GAO-15-49SP

**1.5 Identify relationships between the fragmented, overlapping, and duplicative programs.**

GAO found that federal food assistance is provided through a decentralized system that involves multiple federal, state, and local providers and covers 18 different programs. Three federal agencies, numerous state government agencies, as well as many different types of local providers—including county government agencies and private nonprofit organizations—played a role in providing federal food assistance, but the decentralized network of federal, state, and local entities can be complex.

Figure 7 illustrates how program funds were administered and distributed in the state of Texas, and the roles of a complex network of numerous federal, state, and local entities in providing federal food assistance.

**Figure 7: Entities That Administered Federal Food and Nutrition Assistance Programs in Texas, as of April 2010**



Source: GAO analysis of information gathered from interviews with state officials and local providers in Texas. | GAO-15-49SP

**1.6 Confirm findings with relevant agencies and other key stakeholders.**

To verify program inclusions and exclusions, GAO took the following steps:

- Sent emails to the agencies that only had programs excluded from the program list. All liaisons confirmed the exclusion decisions, with one exception.
- Held meetings or corresponded with liaisons from the agencies with programs that met the inclusion criteria to confirm or solicit feedback on the inclusion decisions. These agencies included USDA, HHS, and DHS. This process resulted in the 18 programs GAO included in its fragmentation, overlap, and duplication review.

GAO also shared a copy of its draft report with officials from USDA, HHS, and DHS for their review and comment. None of the agencies questioned GAO's findings of program overlap and inefficiencies.

**In summary, in this step GAO identified 18 programs that primarily supported food and nutrition assistance in the United States. GAO found that the federal food assistance structure—with its 18 programs—showed signs of program overlap, which can create unnecessary work and waste administrative resources, creating inefficiency. Program overlap occurs when multiple programs have comparable benefits going to similar target populations, which is not uncommon within programs that are administered by multiple agencies and local providers.**

## Step 2: Identify the Potential Effects of Fragmentation, Overlap, and Duplication

### 2.1 Identify potential positive and negative effects of the fragmentation, overlap, or duplication identified in step 1.

To identify potential positive and negative effects of the program overlap, GAO reviewed existing sources of information, such as agency documentation and academic research; interviewed agency officials; and conducted site visits.

Table 18 presents questions to help identify potential positive and negative effects of the overlap and inefficiencies GAO identified in its fragmentation, overlap, and duplication review of food and nutrition assistance programs, as well as GAO's assessment.

**Table 18: Questions to Help Identify Potential Positive and Negative Effects of Fragmentation, Overlap, and Duplication and GAO's Assessment for Food and Nutrition Assistance Programs**

Assessment area	Questions	Assessment
Implementation	<p><u>Is there evidence of the following:</u></p> <ul style="list-style-type: none"> <li>The provision of benefits, services, or products is logical and coordinated?</li> <li>Agencies and programs have strategic agreements in place to help achieve outcomes?</li> <li>Roles and responsibilities are clear?</li> <li>The fragmentation, overlap, or duplication was planned or intentional—such as to fill a gap or complement an existing program—and is still necessary or justified?</li> <li>Any unplanned or unintentional fragmentation, overlap, or duplication has positive effects?</li> <li>The collective programs cover all who might be eligible for benefits, services, or products?</li> </ul>	<p><b>Evidence of both positive and negative effects.</b></p> <p>GAO found that the federal response to food insecurity and the decentralized network of programs developed to address it emerged piecemeal over many decades to meet a variety of goals.</p> <p>Program overlap can create the potential for unnecessary duplication of efforts for administering agencies, local providers, and individuals seeking assistance. Such duplication can waste administrative resources and confuse those seeking services. According to GAO's previous work and officials interviewed for the 2010 report, overlapping program rules related to determining eligibility often required local providers to collect similar information—such as an applicant's income and household size—multiple times because this information was difficult to share, partly due to concerns for safeguarding individuals' confidentiality but also due to incompatible data systems across programs. In addition, some of these rules often required applicants who sought assistance from multiple programs to submit separate applications for each program and provide similar information verifying, for example, household income.</p> <p>However, the availability of multiple programs provided at different locations within a community can also increase the likelihood that eligible individuals seeking benefits from one program will be referred to other appropriate programs. GAO found that because no one program was intended to meet a household's full nutritional needs, the variety of food assistance programs offered eligible individuals and households different types of assistance and could help households fill the gaps and address the specific needs of individual members.</p>

<p>Outcomes and impact</p>	<p><u>Is there evidence of the following:</u></p> <ul style="list-style-type: none"> <li>• The collective provision of benefits, services, or products helps agencies meet the individual and shared goals and objectives of their programs?</li> <li>• Agencies are able to measure the “whole” effort, if multiple agencies and programs are working together to meet shared goals and objectives?</li> <li>• Programs and outcomes are complementary (i.e., not working at cross-purposes or conflicting)?</li> <li>• All who are eligible for benefits, services, or products are receiving them?</li> <li>• Beneficiaries or customers are receiving benefits, services, or products in a unified and coordinated manner (i.e., not receiving similar or duplicative benefits, services, or products from multiple programs)?</li> </ul>	<p><b>Evidence of both positive and negative effects.</b></p> <p>GAO found that research suggested that participation in 7 of the 18 programs was associated with positive health and nutrition outcomes consistent with most of the programs’ goals. However, little was known about the effectiveness of the remaining 11 programs.</p> <p>While the federal government’s food assistance structure allowed households to receive assistance from more than one program at a time, USDA data indicated that a small portion of food insecure households received assistance from more than one of the primary food assistance programs (SNAP, WIC, and NSLP).</p>
<p>Cost-effectiveness</p>	<p><u>Is there evidence of the following:</u></p> <ul style="list-style-type: none"> <li>• The collective provision of benefits, services, or products is economical and efficient?</li> <li>• There is no reduction in benefits resulting from the current structure of providing benefits, services, or products?</li> </ul>	<p><b>Evidence of negative effects.</b></p> <p>GAO found that the federal food assistance structure showed signs of program overlap, which could have resulted in an inefficient use of program funds. GAO found that most food assistance programs had specific and often complex administrative procedures that federal, state, and local organizations followed to help manage each program’s resources and provide assistance. GAO also found that government agencies and local organizations dedicate staff time and resources to separately manage programs even when a number of the programs provided comparable benefits to similar groups.</p>

Source: GAO. | GAO-15-49SP

**2.2 Assess the need for further evaluation.**

Because GAO identified potential negative effects of overlap and inefficiencies, further evaluation of the performance of the identified programs was warranted (see Step 3 of this app. for more detail). Understanding program performance and the effect of relationships between programs can help analysts identify corrective actions to reduce or better manage fragmentation, overlap, and duplication.

**2.3 Confirm findings with relevant agencies and other key stakeholders.**

GAO shared a copy of its draft report with officials from USDA, HHS, and DHS for their review and comment. In its comments, USDA emphasized that no single nutrition assistance program is designed to meet all of a family’s nutrition needs, and that participation in one or more of the largest nutrition assistance programs does not guarantee food security. Additionally, while programs may appear similar in terms of the general demographic characteristics of their target populations, USDA noted that they vary with respect to how well they fit the needs of different subgroups, and no single program attracts or serves everyone in its respective target audience. In its comments, HHS agreed that federal programs should aim to achieve the greatest efficiency, effectiveness, and reduction of duplication and overlap. The agency stated its view that the Older Americans Act Nutrition Services programs complement, not duplicate, USDA’s food and nutrition assistance programs.

**In summary, in this step GAO identified both positive and negative effects resulting from the overlap and inefficiencies present in the 18 food and nutrition assistance programs identified in Step 1. For example, although overlapping program rules resulted in administrative inefficiencies (for example, program administrators having to collect the same or similar eligibility information multiple times), the availability of multiple programs provided at different locations within a community can also increase the likelihood that eligible individuals will be able to receive benefits to address their food insecurity. Because GAO identified potential negative effects of overlap and inefficiencies, further evaluation of the performance of the identified programs (Step 3) was warranted.**

### Step 3: Validate Effects and Assess and Compare Federal Efforts

#### 3.1 Identify existing evaluations of the identified programs and assess their relevance and soundness.

GAO found that research suggested that participation in 7 of the 18 programs included in its fragmentation, overlap, and duplication review—WIC; NSLP; the School Breakfast Program; SNAP; the Elderly Nutrition Program: Home Delivered and Congregate Nutrition Services; Nutrition Assistance for Puerto Rico; and the Special Milk Program—was associated with positive health and nutrition outcomes consistent with most of these programs' goals. These goals included raising the level of nutrition among low-income households, safeguarding the health and well-being of the nation's children, improving the health of Americans, and strengthening the agricultural economy.

- *WIC.* GAO found that research generally suggested that participation in the WIC program was associated with positive outcomes related to all three of its program goals. For example, studies indicated that WIC had several positive effects related to its goal of improving the mental and physical health of low-income pregnant, postpartum, and breastfeeding women; infants; and young children. Specifically, research suggested that WIC had some positive effects on individual dietary and nutrient intake, mean birth weight, general health status of infants and children, and the likelihood that children will receive complete and timely immunizations, among other things. Research on some of the other outcomes related to WIC's goals was less conclusive. For example, findings are mixed on whether participation in the program increases the initiation or duration of breastfeeding or improves cognitive development and behavior of participants—outcomes that were related to WIC's goals of improving the mental and physical health of recipients and preventing the occurrence of health problems and improving the health status of recipients.
- *NSLP and School Breakfast Program.* GAO found that research suggested that both the NSLP and the School Breakfast Program have had some positive effects on health and nutrition outcomes related to their goals of (1) safeguarding the health and well-being of children and (2) encouraging the domestic consumption of agricultural and other foods. Research also showed that both programs increase the dietary and nutrient intakes of participating students, which was related to the goal of safeguarding the health and well-being of children. Also, research suggested that the NSLP increased the frequency of eating lunch among participants. However, research produced conflicting results on the School Breakfast Program's effects on other outcomes related to this goal, such as whether the program increases the frequency that students eat breakfast. Similarly, there was conflicting and inconclusive evidence on NSLP's effects on other outcomes related to the goal of safeguarding the health and well-being of children, such as childhood obesity. In addition, research found that the NSLP had no effect on children's cognitive development or behavior or iron status.
- *SNAP.* GAO found that research suggested that participation in SNAP, the largest of the federal food and nutrition programs, was associated with positive effects on outcomes related to many of its goals. According to the research, participation in SNAP had several positive outcomes related to the program's goals of raising the level of nutrition and increasing the food purchasing power of low-income households. For example, participation in SNAP has been found to increase household food expenditures, increase the availability of nutrients to the household, and, as some research has found, reduce anemia and other nutritional deficiencies. However, the literature was inconclusive regarding whether SNAP alleviates hunger and malnutrition in low-income households, another program goal.
- *The Elderly Nutrition Program: Home Delivered and Congregate Nutrition Services.* GAO found that studies indicated that the program increased socialization and may have a positive effect on food security. In addition, research suggested the program improved participants' dietary and nutrient intake—an outcome related to the program's goal of promoting the health and well-being of older individuals by assisting such individuals to gain access to nutrition and other disease prevention and health promotion services to delay the onset of adverse health conditions resulting from poor nutritional health or sedentary behavior. However, the research did not provide enough evidence to assess the program's effects on other goal-related outcomes, such as nutritional status.
- *Nutrition Assistance for Puerto Rico.* GAO found that research on the program was somewhat limited and dated. However, studies suggested that participation in the program increased household access to a variety of nutrients—an outcome related to its goal of funding nutrition assistance programs for needy people.
- *Special Milk Program.* GAO found that research on the program was also somewhat limited and dated. However, the research showed that participation in the program had positive effects, including increasing children's intake of vitamins and minerals found in milk.

GAO also found that little was known about the effectiveness of the remaining 11 programs included in its fragmentation, overlap, and duplication review because they had not been well studied.

In conducting its work, GAO determined that if fewer than two studies were identified on a program, too little research was available to identify program outcomes. In addition, GAO also determined that too little research was available to identify program outcomes if the research that was identified did not address program effects related to program goals, was methodologically weak or flawed, or was too conflicting to allow for assessments of program effects.

Table 19 summarizes the level of research GAO found on each of the 18 programs.

**Table 19: Amount of Research Identified on the 18 Selected Programs, as of April 2010**

Program	Research identified on program outcomes related to goals <sup>a</sup>	Too little research available to identify outcomes <sup>b</sup>
Child and Adult Care Food Program		X
Commodity Supplemental Food Program		X
Community Food Projects Competitive Grant Program		X
Elderly Nutrition Program: Home Delivered and Congregate Nutrition Services	X	
Emergency Food and Shelter National Board Program		X
Grants to American Indian, Alaska Native, and Native Hawaiian Organizations for Nutrition and Supportive Services		X
Food Distribution Program on Indian Reservations		X
Fresh Fruit and Vegetable Program		X
Nutrition Assistance for Puerto Rico	X	
NSLP	X	
School Breakfast Program	X	
Seniors Farmers' Market Nutrition Program		X
SNAP	X	
Special Milk Program	X	
Summer Food Service Program		X
The Emergency Food Assistance Program		X
WIC	X	
WIC Farmers' Market Nutrition Program		X

Source: GAO. | GAO-15-49SP

<sup>a</sup>At least two studies were identified that addressed program effects on health, nutrition, or other outcomes related to program goals.

<sup>b</sup>Fewer than two studies were identified, or the research that was identified did not address program effects related to program goals, was methodologically weak or flawed, or was too conflicting to allow for assessments of program effects.

Table 20 provides information on the effectiveness of the 11 programs with little performance information, as measured by the federal government’s Program Assessment Rating Tool (PART).<sup>47</sup>

**Table 20: Summary of Program Assessment Rating Tool (PART) Evaluations of the 11 Less Researched Programs, as of April 2010**

Program	PART evaluation rating	Year evaluated
Summer Food Service Program	Moderately effective	2006
Child and Adult Care Food Program	Adequate	2006
Food Distribution Program on Indian Reservations	Adequate	2006
Seniors Farmers’ Market Nutrition Program	Results not demonstrated	2006
WIC Farmers’ Market Nutrition Program	Results not demonstrated	2006
The Emergency Food Assistance Program	Results not demonstrated	2005
Commodity Supplemental Food Program	Results not demonstrated	2004
Community Food Projects Competitive Grant Program	Not evaluated	N/A
Emergency Food and Shelter National Board Program	Not evaluated	N/A
Fresh Fruit and Vegetable Program	Not evaluated	N/A
Grants to American Indian, Alaska Native, and Native Hawaiian Organizations for Nutrition and Supportive Services <sup>a</sup>	Not evaluated	N/A

Source: GAO presentation of data from <http://www.whitehouse.gov/omb/performance>. | GAO-15-49SP

<sup>a</sup> PART evaluated the entire Administration on Aging in 2007 and rated it “effective” but did not evaluate its food and nutrition assistance programs separately.

**3.2 Conduct a new evaluation if existing evaluations are not available, relevant, or sound.**

GAO did not conduct new evaluations of the 11 programs with too little research to identify outcomes.

**3.3 Use evaluations to validate the actual effects of fragmentation, overlap, and duplication and assess and compare the performance of programs.**

GAO found that while research indicated that the largest programs had positive outcomes consistent with their program goals, limited research on most of the smaller programs made it difficult to determine whether they were filling an important gap or whether they were unnecessarily duplicating functions and services of other programs.

**3.4 Confirm findings with relevant agencies and other key stakeholders.**

GAO shared a copy of its draft report with officials from USDA, HHS, and DHS for their review and comment.

**In summary, in this step GAO determined that participation in 7 of the 18 programs included in its fragmentation, overlap, and duplication review was associated with positive health and nutrition outcomes consistent with most of these programs’ goals. Sufficient information was not available to evaluate outcomes for the remaining 11 programs. As a result, in Step 4, GAO considered both efficiency improvements (for programs that have a demonstrated positive effect) and other recommendations to reduce or better manage the identified overlap and resulting inefficiencies (for programs that were unable to demonstrate a positive effect).**

<sup>47</sup>Developed in 2002 by the Office of Management and Budget (OMB), PART was a government-wide evaluation tool used to assess and improve the performance of federal programs. OMB no longer conducts PART reviews.

## Step 4: Identify Options to Increase Efficiency and Reduce or Better Manage Fragmentation, Overlap, and Duplication

### 4.1 Identify options for increasing economy and efficiency.

### 4.2 Identify options for reducing or better managing fragmentation, overlap, and duplication.

GAO concluded that the federal government spends billions of dollars every year to support a food assistance structure that, while critical to addressing some of the most basic needs facing the nation's most vulnerable individuals, showed signs of potential overlap. With the growing rate of food insecurity among U.S. households and significant pressures on the federal budget, it was important to understand the extent to which food assistance programs complement one another to better meet program goals. While research indicated that the largest programs had positive outcomes consistent with their program goals, limited research on most of the smaller programs made it difficult to determine whether they were filling an important gap or whether they were unnecessarily duplicating functions and services of other programs.

GAO noted that consolidating programs presents trade-offs. GAO found that most of the 18 programs, including the small programs, were designed to target assistance to specific populations or meet the specific needs of certain populations, and that efforts to reduce overlap could detract from the goals of some of the programs. For example, GAO found that programs focused on improving the nutritional status of participants may use a different approach than programs focused on reducing food insecurity, even if both programs were available to the same or similar target groups, and efforts to reduce overlap could make it difficult to achieve both goals.

GAO found that USDA had taken steps to coordinate programs within the Food and Nutrition Service (FNS) as well as across state agencies and local providers. In 2003 USDA initiated State Nutrition Action Plans in part to advance cross-program integration among the nutrition education component of the federal food assistance programs at the state level. Through this process, state teams identify a common goal and formulate a plan for working together across programs to achieve that goal. In addition, USDA has taken a number of steps to systematically collect reliable data and identify and disseminate lessons learned for its nutrition education efforts. Another example of USDA's efforts to increase coordination across program services was by permitting their regional offices to retain a small percentage of WIC funds to support regional priorities including, for example, coordinating food assistance programs at the state and local levels.

Despite these steps, **GAO recommended that USDA identify and develop methods for reducing unnecessary overlap among smaller food and nutrition assistance programs while ensuring that those who are eligible receive the assistance they need.** Approaches may include conducting a study; convening a group of experts; considering which of the lesser-studied programs need further research; or piloting proposed changes. Recommendations from further study could be used by administering agencies, or, if appropriate, by Congress, to improve the federal government's food assistance system.

In addition, in March 2011, **GAO further suggested that USDA could broaden its efforts to simplify, streamline, or better align eligibility procedures and criteria across programs to the extent that it is permitted by law.**<sup>48</sup>

<sup>48</sup>See [GAO-11-318SP](#).

**4.3 Communicate options to increase efficiency and reduce or better manage fragmentation, overlap, and duplication to executive branch leaders and policymakers.**

GAO communicated its recommendations to USDA in two reports: *Domestic Food Assistance: Complex System Benefits Millions, but Additional Efforts Could Address Potential Inefficiency and Overlap among Smaller Programs* (GAO-10-346) and *Opportunities to Reduce Potential Duplication in Government Programs, Save Tax Dollars, and Enhance Revenue* (GAO-11-318SP).<sup>49</sup>

In August 2012, USDA officials told GAO that USDA had made reducing unnecessary overlap among its smaller food assistance programs a priority and that it continues to support initiatives that streamline the application and certification process, enforce rules that prevent simultaneous participation in programs with similar benefits or target audiences, and review and monitor program operations to minimize waste and error. At that time, USDA's FNS was conducting a study with an evaluation contractor to gain a better understanding of states' implementation of broad-based, narrow, and traditional categorical eligibility. FNS had commissioned a paper on the feasibility and potential cost of a study to assess the extent of overlap and duplication among all nutrition assistance programs administered by USDA. The feasibility study is now complete. It recommends focusing on the nutrition impacts of overlap among the six largest FNS programs (SNAP, NSLP, WIC, the School Breakfast Program, the Child and Adult Care Food Program, and the Summer Food Service Program) and notes that collecting information specifically targeting overlap with smaller programs would "almost certainly cost more than could be saved by eliminating any duplication, regardless of the data collection approach used." While the study approach recommended in the feasibility study could not fully address the recommendation to examine the impact of program overlap for smaller FNS programs, USDA said that it will continue to seek and explore cost-effective approaches for addressing potential inefficiencies and reducing unnecessary overlap and duplication among all its food assistance programs, including its smaller programs. The agency's work to date may inform its future actions in these areas.

In addition, in March 2014, USDA officials found that USDA has focused considerable administrative and financial resources on assisting states to simplify and streamline eligibility procedures as a result of federal law. The Healthy, Hunger-Free Kids Act of 2010 established state benchmarks for directly certifying for free school meals children from households receiving SNAP benefits. States that do not meet those benchmarks are required to implement continuous improvement plans to improve direct certification systems. The Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2010, provided \$22 million for grants for states to improve direct certification systems. As of school year 2012-2013, 89 percent of SNAP children were directly certified for free school meals, up from 68 percent in school year 2007-2008. In addition, USDA has been phasing in Community Eligibility, another provision of the Healthy, Hunger-Free Kids Act of 2010, under which high-poverty schools or school districts provide free meals to all students and receive federal reimbursement based on their percentage of students directly certified instead of applications. Community Eligibility was operating in 11 states as of school year 2013-2014, and became available nationwide on July 1, 2014. While these efforts help to streamline the application process for some participants, USDA will be in a better position to simplify, streamline, and better align eligibility procedures across programs once its study on participation in multiple FNS programs is complete.

**In summary, in this step GAO outlined what steps USDA has taken to address inefficiencies and overlap and made recommendations on what additional steps the agency can take to reduce the negative effects of overlap among food and nutrition assistance programs. In addition, GAO acknowledged trade-offs associated with consolidating overlapping programs and program requirements.**

<sup>49</sup>See GAO-10-346 and GAO-11-318SP.