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Report to the Chairman, Committee on Agriculture, Nutrition, and Forestry, U.S. Senate

March 2000

FOOD STAMP PROGRAM

Better Use of Electronic Data Could Result in Disqualifying More Recipients Who Traffic Benefits

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Abbreviations

EBT	Electronic benefit transfer
FNS	Food and Nutrition Service
GAO	General Accounting Office
OIG	Office of Inspector General
USDA	U. S. Department of Agriculture

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United States General Accounting Office
Washington, D.C. 20548

Resources, Community, and
Economic Development Division

B-284230

March 7, 2000

The Honorable Richard G. Lugar
Chairman, Committee on Agriculture,
Nutrition, and Forestry
United States Senate

Dear Mr. Chairman:

In 1999, the U.S. Department of Agriculture (USDA) provided about $16 billion in Food Stamp Program benefits to a total of about 18 million recipients. Until the mid-1990s, most recipients used benefits provided in the form of coupons to purchase allowable food, but currently about 70 percent of all benefits are provided electronically. As of November 1999, 35 states and the District of Columbia had statewide electronic benefit transfer (EBT) systems; all the remaining states are required to have signed contracts for such systems by October 2002.[1] Recipients receiving their benefits electronically use cards, much like debit cards, to pay for their groceries at the checkout counter, and the benefits used are deducted from the recipients' monthly allocation. By providing benefits electronically, the federal government saves time and money because the process of printing, safeguarding, distributing, accounting for, and destroying the coupons is eliminated. Furthermore, an EBT system creates an electronic record of each food stamp transaction, making it easier to identify and document instances of food stamp trafficking. Trafficking is a process whereby some recipients and storeowners illegally exchange food stamp benefits for cash.

USDA's Food and Nutrition Service (FNS) administers the Food Stamp Program in partnership with the states. The Service provides funding for the benefits and 50 percent of the state program's administrative costs, develops the program's policies and guidelines, authorizes retail food stores' participation, and monitors storeowners' compliance with program requirements. The states administer day-to-day operations, including certifying households' eligibility and delivering benefits to recipients. The states are also responsible for investigating and prosecuting individuals

[1] For this review, we included the 29 states (including the District of Columbia) that had statewide EBT systems as of Apr. 1, 1999, and had sufficient time to use EBT data for analyzing recipients' purchasing patterns.

suspected of intentionally misusing their benefits. Storeowners and recipients found to engage in trafficking could face a number of penalties, such as temporary or permanent disqualification from the program.

Because of continued congressional concerns about fraud and abuse in the Food Stamp Program, you asked us to determine (1) the extent to which the states with statewide EBT systems are identifying and disqualifying recipients who engage in trafficking and (2) the actions the Service has taken to encourage the states to identify and disqualify recipients engaged in trafficking. As agreed with your office, we examined the actions taken by the Service and the 29 states (including the District of Columbia), that were delivering food stamp benefits through statewide electronic systems prior to April 1, 1999. We also visited six of these states—Florida, Georgia, Illinois, Louisiana, Maryland, and Texas—that have cities with high levels of trafficking in comparison with other cities. (See app. I for more details on our scope and methodology.)

Results in Brief

Of the 29 states with statewide electronic benefit systems, only 4—Florida, Missouri, South Carolina, and Texas—independently and proactively analyzed their electronic databases to identify suspect recipients. A fifth state—Maryland—has used a list of suspected traffickers provided by USDA's Office of Inspector General since 1994 to provide a basis for follow-up investigations. All five of these states invested the resources necessary to investigate suspect recipients, but, for fiscal years 1998 and 1999, only two states—Maryland and Texas—were responsible for about 87 percent of the 6,873 individuals disqualified nationwide from the Food Stamp Program for trafficking benefits. In addition to these five states, nine others investigated suspect recipients—identified primarily by the Food and Nutrition Service—and disqualified those who had engaged in trafficking, albeit to a lesser extent. The remaining 15 of the 29 states did not disqualify any recipient for trafficking during the 2-year period.

EBT data have been available since 1993 to analyze and identify trafficking patterns. However, since only five states had statewide EBT systems before 1997, the Food and Nutrition Service has only recently initiated action to work with the states to ensure that they target recipients likely to be engaged in trafficking—those identified by the Service in its successful cases against storeowners found to have engaged in trafficking. In July 1999, the Service directed its seven regional offices to develop plans to work with the states to identify suspect recipients, investigate the suspects, and to disqualify those engaged in trafficking. As of December 1999, these

plans were still in the preliminary stages. The Service will not be able to determine the effectiveness of its recent efforts in reducing the overall level of trafficking because it lacks a current, reliable estimate of the extent of trafficking. Such an estimate would also better permit the Service to adhere to the principles of the Government Performance and Results Act of 1993, which state that goals and strategies should be quantifiable and measurable. The Service could use EBT data to develop such estimates and to target its available resources.

We are recommending that the Food and Nutrition Service work with those states that routinely use electronic data to determine the best techniques for using the data to identify suspected recipient traffickers and then work with the other states to implement the best practices, as appropriate. We are further recommending that FNS use electronic data to routinely develop reliable estimates of the extent of trafficking and establish goals and strategies for reducing recipient trafficking on the basis of these estimates.

Background

Food stamp trafficking is a violation of program regulations and normally involves two parties—a recipient and a storeowner. Trafficking generally takes place when a recipient collaborates with a storeowner and exchanges coupons or electronic benefits for cash. The storeowner gives the recipient a discounted cash payment for food stamp benefits (often 50 cents on the dollar) and then redeems the benefits at full face value from the government. In a previous report,[2] we examined USDA's estimate of the extent of trafficking—$815 million annually, or 4 percent of annual benefits—and concluded that the estimate was not reliable because it was based on 1993 data, which did not consider the effect of EBT systems.

[2] *Food Stamp Program: Information on Trafficking Food Stamp Benefits* (GAO/RCED-98-77, Mar. 26, 1998).

FNS is generally responsible for monitoring the actions of storeowners, and the states are responsible for monitoring recipients. The states are specifically responsible for investigating recipients alleged to be engaged in trafficking and for disqualifying those found trafficking. Typically, a recipient found guilty of trafficking is disqualified from the program for 1 year for the first offense, 2 years for the second offense, and permanently for the third offense or for trafficking an amount that exceeds $500.[3] To disqualify an individual from the program, the states often have to conduct costly, time-consuming investigations—interviews with the suspect, undercover observations of transactions, and a more detailed analysis of the recipient's shopping habits. Under a proposed regulation, the states could establish claims against recipients for amounts trafficked and collect from both the trafficker or from the benefits available for remaining household members.

EBT databases are a new and potentially effective tool in combating fraud and abuse in the Food Stamp Program. USDA has cited the implementation of EBT systems as a significant step forward in identifying and combating food stamp trafficking. In recent years, FNS has analyzed data from state EBT systems to identify possible cases of food stamp trafficking. These data include the date, time, and amount of the sale; the store authorization number; and the recipient's identification number. Both FNS and USDA's Office of Inspector General analyze the EBT data using a computer program that identifies transaction patterns indicating possible trafficking. These data are then used to investigate and take action against suspected traffickers. The use of EBT data has a particular advantage: Under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, federal agencies may use EBT data alone, without the expense of conducting an undercover investigation, to take action against storeowners violating the requirements of the Food Stamp Program. This act also mandates that all states implement EBT systems by October 1, 2002, unless USDA waives the requirement. Collectively, EBT systems now supply about 70 percent of all food stamp benefits.

[3] In some states, trafficking can also be prosecuted in state court.

Few States Take Advantage of EBT Data to Identify Suspect Recipients

Of the 29 states with statewide electronic benefit systems, only 4—Florida, Missouri, South Carolina, and Texas—independently and proactively analyze their electronic databases to identify suspect recipients. Apparently, these states viewed this activity as essential to their efforts to improve the integrity of the Food Stamp Program. Additionally, since 1994, USDA's Office of Inspector General has identified about 34,000 suspected traffickers in Maryland and provided this information to that state. All five of these states invested the resources necessary to investigate suspect recipients and disqualify those engaged in trafficking. For example, for fiscal years 1998 and 1999, these five states were responsible for disqualifying about 99 percent of all the individuals nationwide who were removed from the Food Stamp Program for trafficking benefits. Although not as aggressive or proactive as these 5 states, 9 other of the 29 states investigated suspect recipients—identified by other sources, such as FNS through its efforts in disqualifying storeowners—and disqualified those who engaged in trafficking. The remaining 15 states did not disqualify any recipient for trafficking during the 2-year period.

Table 1 shows the actions taken by the 29 states and FNS against suspect recipients during fiscal years 1998 and 1999.

Table 1: Number of Trafficking Storeowners and Recipients Removed From the Food Stamp Program in the 29 States With Statewide EBT Programs, Fiscal Years 1998-99

State	Does the state independently use EBT data to identify suspected recipient traffickers?	Does FNS send a list of suspected trafficking recipients to the state?[a]	Does the state use FNS' list or other sources to investigate and disqualify recipient traffickers?[b]	Number of recipients disqualified	Number of trafficking storeowners disqualified by FNS
Alabama	No	No	No	0	10
Alaska	No	c	No	0	0
Arkansas	No	No	Yes	10	3
Colorado	No	Yes	No	0	6
Connecticut	No	Yes	No	0	10
District of Columbia	No	Yes	Yes	5	35
Florida	Yes	Yes	Yes	83	114

Continued

State	Does the state independently use EBT data to identify suspected recipient traffickers?	Does FNS send a list of suspected trafficking recipients to the state?[a]	Does the state use FNS' list or other sources to investigate and disqualify recipient traffickers?[b]	Number of recipients disqualified	Number of trafficking storeowners disqualified by FNS
Georgia	No	Yes	No	0	44
Hawaii	No	No	No	0	4
Idaho	No	c	No	0	0
Illinois	No	Yes	Yes	3	31
Kansas	No	c	Yes	6	0
Louisiana	No	No	Yes	10	29
Maryland	No	Yes	Yes	3,000	35
Massachusetts	No	Yes	No	0	2
Minnesota	No	c	Yes	4	0
Missouri	Yes	Yes	Yes	335	2
New Hampshire	No	c	No	0	0
New Mexico	No	No	Yes	20	4
North Dakota	No	c	No	0	0
Oklahoma	No	No	Yes	25	5
Oregon	No	c	No	0	0
Pennsylvania	No	Yes	No	0	59
Rhode Island	No	c	No	0	0
South Carolina	Yes	Yes	Yes	393	54
South Dakota	No	c	No	0	0
Texas	Yes	No	Yes	2,966	75
Utah	No	Yes	Yes	13	2
Vermont	No	c	No	0	0
Total				**6,873**	**524**

Continued from Previous Page

Note: These states implemented statewide EBT systems at different dates, but all had statewide EBT systems in effect by Apr. 1, 1999. See app. II for the date each state implemented EBT.

[a] FNS currently does not consistently provide a list of suspected trafficking recipients to the states.

[b] Other sources include USDA's Office of Inspector General and hotline calls.

[c] FNS had not disqualified any storeowners in this state.

Source: Food and Nutrition Service.

As the table shows, a total of 6,873 recipients nationwide had been disqualified during fiscal years 1998 and 1999. About 99 percent of the disqualifications occurred in five states—Maryland, 44 percent; Texas, 43 percent; South Carolina, 6 percent; Missouri, 5 percent; and Florida, 1

percent.[4] In these states, officials principally relied upon the results of a detailed analysis of EBT databases to identify suspect recipients and invested the necessary resources to investigate them and to disqualify those found to engage in trafficking. These states coordinated their work with FNS and USDA's Office of Inspector General to ensure their investigations did not overlap, which could have alerted trafficking storeowners that recipients with whom they had engaged in trafficking were being investigated.

Two of the states—Florida and Texas—generally use the strategy that FNS follows in identifying trafficking storeowners. That is, they analyze their EBT data first to identify stores likely to be engaged in trafficking and then they identify likely trafficking recipients using those stores. However, the states' lists of suspected traffickers are more comprehensive than FNS'. For example, Texas often identifies hundreds of recipients suspected of trafficking at each store identified as likely to be engaged in trafficking. On the other hand, FNS generally limits its identification of recipients to the few cases that it needs to support its actions against a storeowner. After recipients are identified as suspected traffickers, the states investigate to confirm whether trafficking actually occurred before disqualifying those found to be engaging in trafficking.

Other states take a different approach. For example, Missouri identifies suspect recipient traffickers by profiling all recipients in the EBT database without regard to specific stores. Between January and August 1999, Missouri identified about 500 recipients for possible investigation. Maryland uses information provided by USDA's Office of Inspector General through a special arrangement to investigate and take action against recipients.[5] Since 1994, when the Inspector General began to provide this list to Maryland, the state's food stamp trafficking unit has disqualified about 7,700 recipients out of about 34,000 referrals, including 3,000 during fiscal years 1998 and 1999. These referrals were associated with eight trafficking storeowners.

[4] Florida's statewide EBT system became operational in Oct. 1998, Maryland's in Apr. 1993, Missouri's in June 1998, South Carolina's in Dec. 1995, and Texas' in Nov. 1995.

[5] The Office of the Inspector General analyzes EBT data to generate a list of all suspect recipients associated with storeowners who have been convicted of trafficking. This list is more complete than the information FNS would provide in connection with its investigation of trafficking storeowners.

Of the 15 states that had not taken any action against trafficking recipients, 5 had received the identity of suspected recipients from FNS. According to officials in these states, they did not investigate suspect recipients because the investigations are time-consuming and costly and it was not cost-effective to do so. The officials in the five states that disqualified about 99 percent of all those removed from the program nationwide for trafficking agreed that acting against suspect traffickers was not cost-effective. However, these officials and FNS officials agree that identifying suspect recipients and disqualifying those who traffic is an essential activity for maintaining the integrity of the Food Stamp Program. They maintain that their efforts act as a deterrent by discouraging other recipients from engaging in trafficking. They also recognize that they have a fiduciary responsibility to operate the program effectively and efficiently. In this regard, FNS has established improving the integrity of the program as a major goal in complying with principles of the Government Performance and Results Act of 1993 (Results Act).

FNS' Limited Actions Are Not Based Upon the Best Estimate of the Extent of RecipientTrafficking, as Prescribed by the Results Act

Although EBT data have been available since 1993 to analyze food stamp transactions for trafficking, FNS has only recently taken steps to encourage the states to target recipients engaged in trafficking.[6] In July 1999, FNS instructed its regional offices to work with the states to reach agreements on how best to use the EBT data now available to identify, investigate, and disqualify trafficking recipients. It also proposed a regulation to permit the states to retain 35 percent of the funds they collect from the penalties assessed against recipients disqualified from the program for trafficking. However, the Service will not be able to determine how effective these actions will be in reducing the overall level of trafficking because it lacks a current, reliable estimate of the extent of trafficking. Such an estimate would also allow FNS to better adhere to the principles of the Results Act, which state that goals and strategies be quantifiable and measurable. EBT data could be used to develop a current, reliable estimate of the extent of trafficking, to establish goals and strategies for reducing trafficking, and to measure the effectiveness of these strategies in reducing trafficking.

[6] Only five states had adopted statewide EBT systems before 1997.

FNS Has Taken Steps to Address Recipient Trafficking

Although some states began using EBT statewide in the mid-1990s, FNS only began in 1999 to develop regional plans with the states for a joint effort to reduce recipient trafficking using EBT data. The seven draft plans we reviewed were all different, but they generally included such activities as defining the federal and state roles for identifying recipients suspected of trafficking and developing processes for routinely sharing information. All these plans provide that FNS would submit to the states the names of suspect recipients associated with storeowners disqualified from the program. However, all states could target a more extensive list of suspect recipients for investigation. FNS' plans do not set goals for the number of recipients to be investigated and/or disqualified. Furthermore, none of the plans described how they contribute to FNS' overall effort to reduce trafficking. As of December 1999, all of these plans were still in the preliminary stages.

In a separate action, recognizing the high cost to the states of investigating and disqualifying trafficking recipients, FNS recently proposed an amendment to the food stamp regulations to allow the states to establish claims to recover the benefits trafficked by those disqualified from the program and to keep 35 percent of the funds collected. This portion of the collected funds that the states would retain is in addition to the 50 percent in administration costs that FNS already provides the states for managing the program. Under this proposed regulation, the states could keep some of the funds collected from a trafficker—the disqualified household member; more probably, however, the family's benefit would be reduced by up to 20 percent each month until the amount trafficked is repaid.

To illustrate, assume that a family of four had received $400 in monthly food stamp benefits and that one household member was disqualified for trafficking a total of $600. Three family members would still be entitled to receive monthly benefits totaling $300. The state could collect the money directly from the member disqualified or more likely recoup the benefits trafficked by offsetting benefits provided to other family members. The state could reduce future monthly benefits to the family by $60 (20 percent of $300) for 10 months to recover the $600 of benefits trafficked. The state would retain 35 percent of the amount recouped ($210).

The six states we visited were all aware of the terms of the proposed regulatory change and how it provided a financial incentive to take action against recipient traffickers. However, they differed on whether the potential amounts to be recovered would be adequate for funding the

expenses of independently identifying, investigating, and penalizing recipients who traffic benefits.

FNS' Goals and Strategies Are Not Based Upon the Best Estimate of the Extent of Recipient Trafficking

FNS is not able to measure the effectiveness of its or the states' efforts in reducing the overall level of trafficking because it lacks current, reliable information on the extent of trafficking. The last estimate, developed in 1995, used 1993 data and did not rely on EBT data. With the introduction of EBT systems in 1993, FNS has an important tool for developing current estimates of the extent of trafficking at the local, state, and national levels. Using these estimates, FNS could establish goals for reducing trafficking on the basis, for example, of the value of benefits trafficked each year. FNS could then develop strategies to efficiently and effectively reduce trafficking and use EBT data to measure the extent to which it was achieving its goals. This approach to addressing the issue of recipient trafficking would be based upon a more reliable estimate of the extent of trafficking and therefore would be more consistent with the provisions of the Results Act, which prescribe that valid data be used to measure performance.

FNS' actions to help the states reduce recipient trafficking are not being guided by the best available estimate of the extent of recipient trafficking, which would enable it to better set appropriate goals and strategies, as prescribed by the Results Act. Instead, as currently proposed in the draft regional plans, FNS would work with the states only to investigate the number of suspect recipients identified as being involved with trafficking storeowners. In its fiscal year 1999 and 2000 performance plans, FNS' goal is to disqualify 1,201 stores annually. FNS could realize this goal but not substantially reduce the overall level of trafficking because the stores disqualified may be those stores with relatively low levels of trafficking. FNS has not set priorities for targeting the trafficking stores—for example, the volume of transactions and/or the value of the benefits trafficked. If FNS set such priorities and identified these storeowners, additional states might have an incentive to examine more suspect recipients purchasing at these stores because the likelihood of recipient trafficking would be greater.

Conclusions

The use of EBT data to identify suspect recipients has proven effective for developing a pool of recipients likely to be trafficking as a first step in conducting investigations and disqualifying those found to have engaged in trafficking. The five states extensively using EBT data have disqualified

about 99 percent of the 6,873 traffickers disqualified nationwide from the program. FNS and these states recognize that identifying and disqualifying traffickers is a costly undertaking. However, they also rightly recognize that their efforts can serve as a deterrent to future trafficking and that they have a fiduciary responsibility to maintain the integrity of the Food Stamp Program. The aggressive and specific techniques used by these states in conducting their efforts to minimize trafficking could provide useful models to the other states.

FNS and state efforts to identify, investigate, and disqualify trafficking recipients are being conducted in the absence of a reliable estimate of the extent of trafficking. Without such an estimate, neither FNS nor the states can measure their performance and determine the most effective deterrents to trafficking. With the increasing use of EBT data, more reliable estimates can be developed. If FNS and the states are to work together to deter trafficking, developing such estimates is an important step in setting appropriate goals and strategies and measuring the effectiveness of those strategies, as prescribed by the Results Act.

Recommendations

To improve the integrity of the Food Stamp Program, we recommend that the Secretary of Agriculture direct the Administrator of the Food and Nutrition Service to (1) work with the five states currently using EBT data to determine the best techniques for using these data to identify suspected recipient traffickers and work with the other states with statewide EBT systems to implement the best techniques, as appropriate and (2) use EBT data to periodically develop reliable estimates of the extent of trafficking and use these estimates to develop goals and appropriate strategies for reducing trafficking.

Agency Comments

We provided a draft of this report to the U. S. Department of Agriculture for its review and comment. We met with Food and Nutrition Service officials, including the Directors of the Program Accountability Division (Food Stamp Program) and the Grants Management Division. These officials generally agreed with the report's findings, conclusions, and recommendations. They stated that the Service's ability to implement the recommendation on using EBT data to maintain reliable estimates of the extent of trafficking would be sharply limited because the Service has neither the specialized software to analyze large data sets nor the expertise needed to use it properly. They also stated that the Congress had recently

prohibited the Service from using program funds to conduct such studies or evaluations. However, while the Congress has restricted the Service's use of certain research funds, it has provided millions of dollars to the Service for fighting fraud and improving the integrity of the Food Stamp Program. For example, the Congress provided the Service $5 million in fiscal year 2000 to use in preventing, identifying, and prosecuting fraud, among other purposes, and further directed the Service to spend at least $3 million more to improve the integrity of the Food Stamp and Child Nutrition programs. Furthermore, the President's budget for fiscal year 2001 proposes $13 million for these purposes. The FNS officials also stated that the Service had recently developed, using old research funding, an estimate of the extent of trafficking nationwide as of 1998, and plans to release the estimate by the end of March 2000. These officials also provided a number of editorial and technical comments, which we incorporated into the report, where appropriate.

We conducted our work from May 1999 through January 2000 in accordance with generally accepted government auditing standards. Appendix I discusses our scope and methodology.

As arranged with your office, unless you announce its contents earlier, we plan no further distribution of this report until 30 days after the date of this report. At that time, copies of this report will be sent to congressional committees responsible for the Food Stamp Program; the Honorable Dan Glickman, Secretary of Agriculture; the Honorable Shirley Watkins, Under Secretary of Food, Nutrition, and Consumer Services, USDA; the Honorable Samuel Chambers, Administrator, Food and Nutrition Services, USDA; and the Honorable Roger Viadero, Inspector General, USDA. We will also provide copies to others on request.

If you or your staff have any question about this report, please contact me at (202) 512-5138. Key contributors to this report are listed in appendix III.

Sincerely yours,

Lawrence J. Dyckman
Director, Food and Agriculture Issues

Scope and Methodology

To determine the extent to which states with statewide electronic benefit transfer (EBT) systems were identifying and disqualifying recipients who engage in food stamp trafficking, we visited six states—Florida, Georgia, Illinois, Louisiana, Maryland, and Texas—with cities that our analysis of EBT data showed had high rates of trafficking. In each of those states, we reviewed available policies, procedures, and practices, and interviewed officials responsible for investigating food stamp trafficking. We also obtained data from the Food and Nutrition Service's (FNS) regional offices on the 29 states that had statewide EBT systems in effect before April 1999, as well as from FNS' management information systems. We limited our work to the states with statewide EBT systems because these systems provide a detailed database of all transactions between recipients and stores. We did not review the activities of the remaining states that distribute benefits through coupons because these states can identify suspected recipients engaged in trafficking only by conducting extensive undercover investigations.

To determine the actions FNS has taken to encourage states to identify and disqualify recipients engaged in trafficking, we interviewed FNS officials at headquarters and four FNS regional offices—the Southeast Region in Atlanta, Georgia; the Southwest Region in Dallas, Texas; the Midwest Region in Chicago, Illinois; and the Mid-Atlantic Region in Robbinsville, New Jersey. We also reviewed FNS' strategic and annual performance plans and draft plans recently developed by each FNS regional office for working with the states within their jurisdiction to pursue recipients engaged in trafficking. We conducted follow-up telephone contacts, as needed, to discuss the details of these regional plans and to obtain information on actions taken by the states. We also analyzed relevant legislation, implementing regulations, and program guidance. In addition, we met with officials in the U.S. Department of Agriculture's Office of the Inspector General and reviewed their reports on this program relating to fraud and abuse.

We conducted our work from May 1999 through January 2000 in accordance with generally accepted government auditing standards.

Twenty-Nine States With Statewide EBT Data, as of April, 1999

State	Date EBT system was implemented
Alabama	November 1997
Alaska	June 1998
Arkansas	April 1998
Colorado	February 1998
Connecticut	October 1997
District of Columbia	October 1998
Florida	October 1998
Georgia	November 1998
Hawaii	August 1998
Idaho	February 1998
Illinois	November 1997
Kansas	March 1997
Louisiana	December 1997
Maryland	April 1993
Massachusetts	October 1997
Minnesota	October 1998
Missouri	June 1998
New Hampshire	January 1999
New Mexico	August 1995
North Dakota	March 1997
Oklahoma	January 1998
Oregon	May 1998
Pennsylvania	September 1998
Rhode Island	October 1998
South Carolina	December 1995
South Dakota	March 1997
Texas	November 1995
Utah	April 1996
Vermont	October 1998

Source: Food and Nutrition Services.

Key Contacts and Staff Acknowledgments

GAO Contacts

Lawrence J. Dyckman, (202) 512-5138
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Acknowledgments

In addition to those named above, John K. Boyle, Paul J. Pansini, Carol Herrnstadt Shulman, and Michael Tropauer made key contributions to this report.

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