



September 2024

# CHARITABLE FOOD ASSISTANCE

## USDA Can Enhance Guidance and Improve Program Performance Assessment

# GAO Highlights

Highlights of [GAO-24-106539](#), a report to congressional requesters

## Why GAO Did This Study

Visits to food banks and food pantries to obtain free food increased substantially during the COVID-19 pandemic. Two USDA nutrition assistance programs—TEFAP and CSFP—rely on local agencies (such as food banks and food pantries) for their implementation. GAO was asked to review these programs.

This report examines (1) the strengths and limitations of federal indicators of food hardship, (2) the extent to which USDA oversees state implementation of TEFAP and CSFP, and (3) the extent to which USDA has assessed the performance and effectiveness of these programs.

GAO reviewed documentation and interviewed USDA officials, six selected experts, and two relevant national organizations. In addition, GAO selected three states to obtain variation in TEFAP and CSFP participation and other characteristics: Washington, D.C., New Mexico, and Montana. GAO visited and interviewed state officials responsible for administering the programs in these states and representatives from 14 selected food banks and food pantries. GAO also interviewed officials from a large independent food bank.

## What GAO Recommends

GAO is making five recommendations to USDA, including to provide consolidated, user-friendly program guidance; to streamline the process to resolve delivery issues and complaints; and to implement a program performance assessment system, beginning with setting measurable program performance goals. USDA concurred with the recommendations.

View [GAO-24-106539](#). For more information, contact Kathryn Larin at (202) 512-7215 or [larink@gao.gov](mailto:larink@gao.gov).

September 2024

## CHARITABLE FOOD ASSISTANCE

### USDA Can Enhance Guidance and Improve Program Performance Assessment

## What GAO Found

The U.S. Department of Agriculture (USDA) has established three key indicators of food hardship: food security, food sufficiency, and use of community food. These indicators have various strengths and limitations, according to GAO analysis. For example, the indicator of food security has been validated and consistent over time and is considered the gold standard by experts. At the same time, the indicators do not provide insight on the causes of food hardship, nor were they designed to measure the effectiveness of federal nutrition assistance programs. Changes in food hardship could be due to many factors other than the performance of programs, such as fluctuations in the economy or in food prices.

Figure: Bag of USDA Foods Walnuts for Food Pantry Distribution



Source: GAO. | GAO-24-106539

USDA's Food and Nutrition Service (FNS) oversees state implementation of The Emergency Food Assistance Program (TEFAP) and the Commodity Supplemental Food Program (CSFP), which together received about \$2.8 billion in federal funding in fiscal year 2023. Specifically, FNS monitors state operations and provides written guidance, technical assistance, and information sharing. However, FNS regional officials reported that FNS does not provide consolidated and user-friendly guidance, such as a handbook, for states and local agencies that implement the programs. Instead, GAO searches on the FNS website identified 69 TEFAP and 46 CSFP guidance documents. In addition, local agencies GAO interviewed generally said they appreciated the food they received from TEFAP or CSFP, but FNS and state officials reported challenges addressing deliveries of spoiled or damaged food in a timely manner. Lack of a timely response can result in inefficiencies and tense interactions at food banks, according to officials. Improving guidance and implementing a streamlined process to address these food deliveries could help FNS better support states and local agencies in implementing these key nutrition assistance programs.

FNS has not established a program performance assessment system for TEFAP and CSFP. For example, while FNS has identified various priorities for these programs, it has not established measurable performance goals. As a result, it is difficult to assess progress or outcomes over time. While FNS has proposed to improve data collection, gaps in knowledge about the effectiveness of TEFAP and CSFP have persisted. A robust performance assessment system could put FNS in a better position to evaluate the effectiveness of these programs.

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# Contents

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Letter		1
	Background	4
	Federal Indicators of Food Hardship Have Different Purposes, Strengths, and Limitations	10
	FNS Conducts Various Oversight Activities to Help States and Local Agencies Operate TEFAP and CSFP, but Gaps Exist	19
	FNS Has Set Agency Priorities but Does Not Have Specific Performance Goals, Measures, or Evaluations for TEFAP and CSFP	30
	Conclusions	36
	Recommendations for Executive Action	36
	Agency Comments	37
Appendix I	Objectives, Scope, and Methodology	39
Appendix II	Changes in Federal Food Hardship Indicators over Time	43
Appendix III	Different Processes to Address Out-of-Condition USDA Foods	45
Appendix IV	GAO Contact and Staff Acknowledgments	47
Tables		
	Table 1: Overview of Federal Food Hardship Indicators	10
	Table 2: Different U.S. Department of Agriculture (USDA) Processes to Address Out-of-Condition Food	45
Figures		
	Figure 1: Bag of USDA Foods Walnuts for Food Pantry Distribution	5
	Figure 2: The Emergency Food Assistance Program (TEFAP) and Commodity Supplemental Food Program (CSFP) Interaction with Charitable Food Assistance Network	9
	Figure 3: Levels of Food Security and Food Insecurity	12

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Figure 4: Prevalence of Food Insufficiency in U.S. Households, 2020–2023	15
Figure 5: The Emergency Food Assistance Program (TEFAP) and the Commodity Supplemental Food Program (CSFP) Oversight	20
Figure 6: U.S. Department of Agriculture (USDA) Escalation Process for Delivery Issues	27

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## Abbreviations

AMS	Agricultural Marketing Service
CCC	Commodity Credit Corporation
CPS-FSS	Current Population Survey Food Security Supplement
CSFP	Commodity Supplemental Food Program
ERS	Economic Research Service
FNS	Food and Nutrition Service
HPS	Household Pulse Survey
TEFAP	The Emergency Food Assistance Program
USDA	U.S. Department of Agriculture

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September 23, 2024

The Honorable Glenn “GT” Thompson  
Chairman  
Committee on Agriculture  
House of Representatives

The Honorable Virginia Foxx  
Chairwoman  
Committee on Education and the Workforce  
House of Representatives

In 2023, 13.5 percent of households in the United States were food insecure, which means they did not have access to enough food for an active and healthy life, and 5.1 percent had very low food security.<sup>1</sup> In addition, visits to food banks and pantries to obtain free food increased substantially during the COVID-19 pandemic. Visits increased the most among households that were food insecure and had very low food security, according to the U.S. Department of Agriculture’s (USDA) annual household food security reports.

USDA administers 16 nutrition assistance programs to help supplement the diets of low-income people. Two of these programs—The Emergency Food Assistance Program (TEFAP) and the Commodity Supplemental Food Program (CSFP)—rely on local agencies such as food banks and food pantries (also known as the charitable food assistance network) to distribute food.

In fiscal year 2023, federal funding was almost \$2.5 billion for TEFAP and almost \$339 million for CSFP.<sup>2</sup> Given this federal investment, it is important to understand how USDA oversees these programs; how these programs relate to indicators of food hardship, such as food insecurity;

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<sup>1</sup>Households with very low food security reported multiple indications of disrupted eating patterns and reduced food intake because the household lacked money and other resources for food.

<sup>2</sup>2025 U.S. Department of Agriculture (USDA) Explanatory Notes – Food and Nutrition Service, <https://www.usda.gov/sites/default/files/documents/34-FNS-2025-ExNotes.pdf>. In fiscal year 2023, \$943 million of the almost \$2.5 billion of federal funding for TEFAP was provided to emergency feeding organizations under the statutory authority of the Commodity Credit Corporation (CCC). Of the \$943 million, USDA’s Food and Nutrition Service (FNS) provided \$32.2 million in funding to support the storage and distribution of the additional CCC foods; the remaining \$901.5 million was used for CCC food purchases.

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and whether there is evidence that these programs are achieving their goals.<sup>3</sup>

This report examines (1) the strengths and limitations of federal indicators of food hardship and the extent to which these indicators have changed over time, (2) the extent to which USDA oversees state implementation of TEFAP and CSFP, and (3) the extent to which USDA has assessed the performance and effectiveness of TEFAP and CSFP.

To address all three objectives, we reviewed relevant federal laws and regulations, data, and USDA documents regarding TEFAP and CSFP oversight, goals, and priorities. In addition, we interviewed:

- USDA national office officials from the Food and Nutrition Service (FNS), Economic Research Service, and Agricultural Marketing Service (AMS);
- USDA FNS regional office officials responsible for overseeing TEFAP and CSFP in all seven regions;
- six selected experts and two national organizations: Feeding America (a nonprofit membership and advocacy organization that represents food banks and food pantries) and the American Commodity Distribution Association (a nonprofit professional association devoted to the improvement of USDA's food distribution system);<sup>4</sup>
- state officials responsible for administering the programs in three selected states: the District of Columbia, Montana, and New Mexico;<sup>5</sup>

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<sup>3</sup>We use the term "indicators" in this report as an umbrella term for measures that are made by collecting data to assess the nature and prevalence of food hardship over time. We use the term "food hardship" as an umbrella term for economic challenges to accessing adequate, nutritious food.

<sup>4</sup>We selected the experts based on authorship of relevant scholarly research on food security, charitable food assistance, TEFAP, and CSFP and recommendations from other experts. We selected the national organizations and other stakeholders based on their knowledge about the charitable food assistance network, TEFAP, and CSFP. In addition to interviews, we received written comments from state officials through the American Commodity Distribution Association.

<sup>5</sup>We selected the three states to obtain variation in TEFAP food cost per capita, CSFP participation per capita, and food insecurity rates, among other criteria. Throughout this report, when we refer to states we visited or state officials we spoke with, this includes the District of Columbia unless otherwise noted.

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- fourteen selected local agencies (food banks and food pantries) in the three selected states to better understand how the programs operate and any challenges they face in administering the programs;<sup>6</sup> and
  - a large independent food bank that is not part of the Feeding America network and does not participate in TEFAP and CSFP to obtain perspectives from the broader charitable food assistance network.

In addition, to address the first objective, we analyzed USDA and U.S. Census Bureau data and documentation to identify and understand key federal indicators of food hardship, including the Current Population Survey Food Security Supplement (CPS-FSS). We assessed the reliability of these data by reviewing technical documentation and interviewing USDA officials and determined them to be sufficiently reliable for the purposes of providing summary and trend information about these indicators.

To address the second objective, we analyzed USDA documentation and interviewed USDA officials regarding FNS's oversight process, including program monitoring, guidance, technical assistance, and the process for resolving issues related to the condition of food delivered through TEFAP and CSFP. We compared FNS's oversight activities against relevant USDA and FNS agency goals and priorities, as well as federal internal control principles related to risk assessment and information and communication.

To address the third objective, we analyzed USDA documentation and interviewed USDA officials regarding how the agency measures performance and assesses the effectiveness of TEFAP and CSFP. We compared this evidence to key elements of a program performance assessment system, which is an important component of effective program management, as identified in our prior work.<sup>7</sup> In addition, we

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<sup>6</sup>We selected food banks and food pantries based on stakeholder recommendations and to obtain variation in factors such as size, TEFAP and CSFP participation, and affiliation with Feeding America. The selected food bank in the District of Columbia also operates in Maryland and Virginia, so we also visited partner food pantries in suburban Maryland and Virginia. Observations from our interviews with officials in selected states, food pantries, and food banks provide illustrative examples but are not generalizable to all states, food pantries, or food banks.

<sup>7</sup>GAO, *Broadband: USDA Should Set Performance Goals and Improve Fraud Risk Management for Funding Program*, [GAO-23-105265](#) (Washington, D.C.: Oct. 31, 2022); and *Veterans Justice Outreach Program: VA Could Improve Management by Establishing Performance Measures and Fully Assessing Risks*, [GAO-16-393](#) (Washington, D.C.: Apr. 28, 2016).



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reviewed data about the pounds of food purchased and distributed for TEFAP and CSFP from fiscal year 2019 through 2023 to reflect a period before and during the COVID-19 pandemic. We assessed the reliability of these data by reviewing documentation and interviewing USDA officials and determined they were sufficiently reliable for the purpose of presenting summary information about pounds of food purchased and distributed. See appendix I for additional information about our objectives, scope, and methodology.

We conducted this performance audit from January 2023 to September 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.

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## Background

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### TEFAP and CSFP

TEFAP helps supplement the diets of low-income people by providing them with emergency food assistance at no cost. It does this by providing states with domestically sourced agricultural products purchased by USDA (USDA Foods)—including fruits, vegetables, meats, and grains—and funding for administrative costs (see fig. 1).<sup>8</sup> The amount of food and administrative funds each state receives out of the total amount of food provided is based on the number of unemployed people and the number of people with incomes below the poverty level in the state.

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<sup>8</sup>USDA Foods programs include TEFAP and CSFP, as well as the Food Distribution Program on Indian Reservations and the USDA Foods in Schools Program, which distribute food to Tribes and tribal organizations and public schools, respectively.

**Figure 1: Bag of USDA Foods Walnuts for Food Pantry Distribution**



Source: GAO. | GAO-24-106539

CSFP works to improve the health of low-income people at least 60 years of age by supplementing their diets with nutritious USDA Foods. USDA distributes both food and administrative funds to participating states based on an assigned number of cases, referred to as a state's caseload, and whether the state has consistently achieved CSFP participation equal to at least 95 percent of its assigned caseload.

At the federal level, USDA's FNS, in collaboration with the AMS, administers TEFAP and CSFP.<sup>9</sup> These programs distribute entitlement commodities (an amount of USDA Foods to which grantees are entitled by law) as well as bonus commodities (USDA Foods purchases based on the needs of agricultural producers).<sup>10</sup> FNS works with AMS to ensure appropriate foods are available in the programs, allocates food and funds to states, and provides states with oversight and technical assistance, among other activities. FNS is responsible for the administration, implementation, and oversight of TEFAP and CSFP at the federal level, and the provision of technical assistance to state agencies, according to FNS officials.

At the state level, a state distributing agency designated by the governor or state legislature administers TEFAP and CSFP. Generally, these are

<sup>9</sup>AMS helps administer TEFAP and CSFP by managing food procurement through solicitations, awards, and contract management.

<sup>10</sup>Congressional Research Service, *Domestic Food Assistance: Summary of Programs*, R42353 (Washington, D.C.: Aug. 27, 2019).

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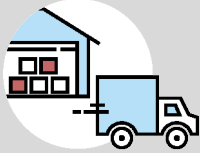
state departments of health and human services, agriculture, or education. For CSFP, Tribes and tribal organizations may also be state agencies.<sup>11</sup> State agencies are generally responsible for all aspects of program administration within each state, including program implementation and oversight, and the provision of requirements and technical assistance to local agencies. State agencies have discretion to administer the programs to best meet the needs of the state's participants, provided that federal requirements are met.

Food banks, food pantries, and other local agencies typically play a key role in distributing food to the public. This includes determining individuals' eligibility for TEFAP and CSFP, providing food to participants, maintaining and storing records appropriately, and taking care to store foods correctly and manage inventory appropriately, in accordance with program requirements. Such organizations typically rely on volunteers, and many food pantries are staffed entirely with volunteers.

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<sup>11</sup>CSFP can be administered by Tribes and tribal organizations, which are considered state agencies in the program. Throughout this document, we use the term "state agencies," and Tribes and tribal organizations are included in this group for CSFP. Tribal organizations are not able to enter into direct agreements with the USDA to administer TEFAP; however, tribal organizations may participate in TEFAP as eligible recipient agencies by entering into agreements with TEFAP state agencies. See U.S. Department of Agriculture, Food and Nutrition Service, *FD-069: The Emergency Food Assistance Program* (Nov. 27, 2007), <https://www.fns.usda.gov/tefap/eligibility-indian-tribal-organizations>.

### Local Agencies in the Charitable Food Assistance Network



- **Food banks:** Food banks are typically regional warehouses that store and deliver food to smaller client-facing organizations like food pantries and soup kitchens. In some cases, food banks may also provide food directly to low-income individuals and households.



- **Food pantries:** Food pantries are organizations that distribute food directly to low-income individuals and households. The majority of food pantries are nonprofit organizations associated with a religious group.



- **Soup kitchens:** Like food pantries, soup kitchens provide food directly to low-income individuals and households, but soup kitchens typically focus on providing prepared meals.

Source: Congressional Research Service, *Food Banks and Other Emergency Feeding Organizations: Federal Aid and the Response to COVID-19*, R46432 (Washington, D.C.: June 25, 2020); Congressional Research Service, *The Emergency Food Assistance Program (TEFAP): Background and Funding*, R45408 (Washington, D.C.: December 29, 2023); and GAO (icons). | GAO-24-106539

While USDA purchased a combined 1.76 billion pounds of food for TEFAP and CSFP in fiscal year 2023, these programs are among the smaller nutrition assistance programs in the FNS portfolio, together comprising less than 2 percent of FNS's nutrition assistance costs.<sup>12</sup> In fiscal year 2023, USDA purchased 1.5 billion pounds of TEFAP entitlement, bonus, and other foods for delivery to warehouses in states and territories for distribution to local agencies. In the same year, USDA provided over 251 million pounds of CSFP food to warehouses in states and territories for distribution to local agencies. On average, almost 700,000 older adults participated in CSFP per month in fiscal year 2023; participation data are not collected for TEFAP.

<sup>12</sup>For example, in fiscal year 2023, the largest nutrition assistance programs in terms of cost were the Supplemental Nutrition Assistance Program (68 percent of total nutrition assistance expenditures) and Child Nutrition Programs (16 percent of total nutrition assistance expenditures). See J. W. Jones and S. Toossi, *The Food and Nutrition Assistance Landscape: Fiscal Year 2023 Annual Report*, Report No. EIB-274 (Washington, D.C.: U.S. Department of Agriculture, Economic Research Service, June 2024).

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## The Charitable Food Assistance Network

Food banks, food pantries, and other local agencies<sup>13</sup>—sometimes referred to as the charitable food assistance network—are often the first places people go when they need help obtaining food, in part because these organizations offer immediate help whereas accessing other federal nutrition assistance, such as the Supplemental Nutrition Assistance Program, can take time.

The charitable food assistance network has historically relied heavily on private donations and state and local funding in addition to federal aid.<sup>14</sup> However, federal programs also provide a significant source of food and revenue for the charitable food assistance network. For example, Feeding America reported that TEFAP provided over 20 percent of the food distributed through Feeding America food banks and local hunger-relief programs as of 2022.<sup>15</sup>

Feeding America represents a large segment of food banks and food pantries nationwide. Eighty percent of such organizations were affiliated with Feeding America in 2000, according to the last comprehensive study of the charitable food assistance network.<sup>16</sup> According to Feeding America, its member network now includes more than 200 food banks, 21 statewide food bank associations, and over 60,000 faith-based and charitable partner agencies, food pantries, and meal programs. Feeding America's primary source of revenue is donated goods and services, and over 90 percent of expenses are for food procurement on behalf of member food banks.

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<sup>13</sup>Food banks, food pantries, and other organizations that provide free meals and groceries are sometimes referred to as “emergency feeding organizations” and, in TEFAP regulation and statute, as “eligible recipient agencies.” In this report, we refer to the entities receiving and distributing TEFAP and CSFP foods as “local agencies” to distinguish them from state or federal government entities.

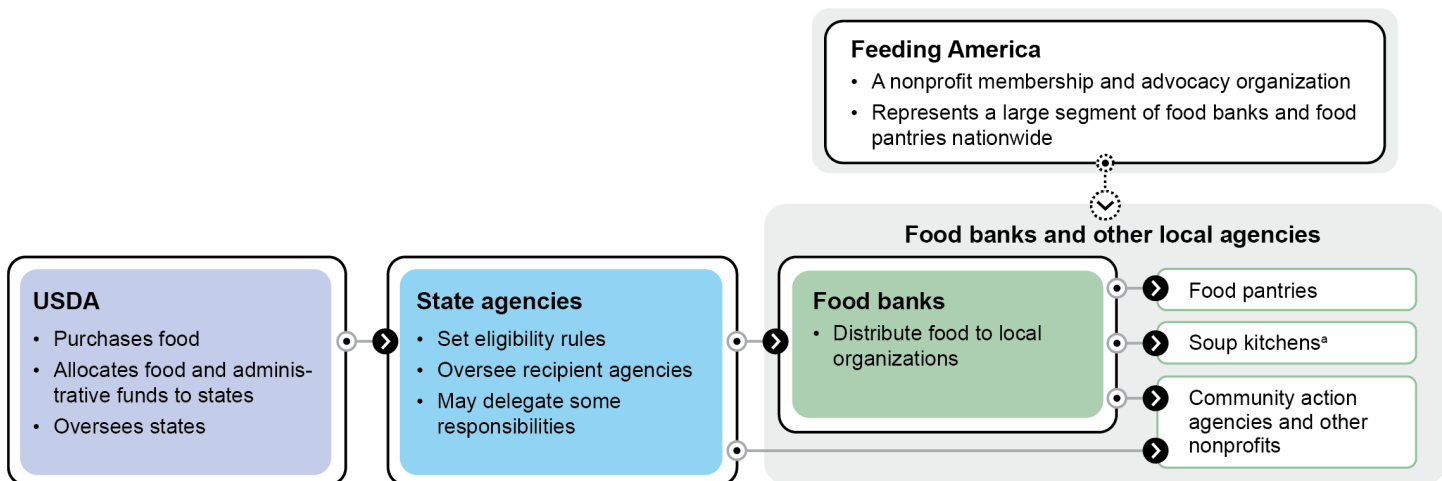
<sup>14</sup>Congressional Research Service, *Food Banks and Other Emergency Feeding Organizations: Federal Aid and the Response to COVID-19*, R46432 (Washington, D.C.: June 25, 2020).

<sup>15</sup>A large majority of the TEFAP foods purchased by USDA are distributed by food banks affiliated with Feeding America. The exact percentage is difficult to calculate with precision because USDA and Feeding America use different systems to track food amounts and pounds purchased.

<sup>16</sup>J. C. Ohls et al., *The Emergency Food Assistance System—Findings From the Provider Survey, Volume II: Final Report*, Report No. FANRR-16-2 (Washington, D.C.: U.S. Department of Agriculture, Economic Research Service, August 2002).

In addition to coordinating food donations, Feeding America provides members with support and services related to the implementation of TEFAP and CSFP. This includes sharing guidance, training, and best practices to ensure member organizations have the tools to implement these programs according to the law and regulations (see fig. 2). Feeding America collects data from its member organizations and conducts research and analysis about food insecurity and the use of food from food banks and food pantries. It also conducts policy advocacy and carries out public awareness and education campaigns, among other activities.

**Figure 2: The Emergency Food Assistance Program (TEFAP) and Commodity Supplemental Food Program (CSFP) Interaction with Charitable Food Assistance Network**



Source: GAO analysis of information from the Congressional Research Service and U.S. Department of Agriculture (USDA). | GAO-24-106539

<sup>a</sup>CSFP food packages are typically distributed through local agencies that may include food banks, food pantries, community action agencies, Tribes and tribal organizations, and other nonprofit organizations, but not typically by soup kitchens.

## Federal Indicators of Food Hardship Have Different Purposes, Strengths, and Limitations

### Indicators Have Strengths and Limitations in Describing Food Hardship and Have Evolved over Time

USDA has established three key indicators to better assess the nature and prevalence of food hardship over time (see table 1).<sup>17</sup> The three indicators—food security, food sufficiency, and use of community food—describe different aspects of household food hardship within the United States.

**Table 1: Overview of Federal Food Hardship Indicators**

Indicator	Definition	Reference period	Survey tool	Data available	Indicator levels
Food security	Households have access to enough food for an active, healthy life, including readily available, nutritionally adequate, and safe foods, and the ability to acquire these foods in socially acceptable ways (without resorting to emergency food supplies, scavenging, stealing, or other coping strategies)	Preceding 12-month period <sup>a</sup>	Current Population Survey Food Security Supplement (CPS-FSS)	1995–present	High food security, Marginal food security, Low food security, Very low food security
Food sufficiency <sup>b</sup>	Households have enough to eat	Preceding 7-day period	Household Pulse Survey (HPS)	2020–present	Full food sufficiency, Marginal food sufficiency, Low food sufficiency, Very low food sufficiency

<sup>17</sup>The U.S. Census Bureau conducts both the Current Population Survey Food Security Supplement (CPS-FSS) and the Household Pulse Surveys. In addition, USDA has worked with the U.S. Census Bureau to review and revise the CPS-FSS. See table 1 and app. II for more information.

Indicator	Definition	Reference period	Survey tool	Data available	Indicator levels
Use of community food (e.g., food pantries, soup kitchens, or other sources of free groceries or meals) <sup>c</sup>	Households report obtaining free groceries from a food pantry or other place or receiving a free meal from a church, shelter, or other place one or more times	Preceding 12-month period	CPS-FSS	1996–2021 2022–present <sup>d</sup>	Received free groceries or free meals, Did not receive free groceries and/or free meals

Source: GAO analysis of U.S. Department of Agriculture (USDA) and U.S. Census Bureau documents. | GAO-24-106539

<sup>a</sup>The annual CPS-FSS was designed to assess households' food security during the 12-month period prior to the survey, but information is also collected for the 30-day period before the survey for a subset of households.

<sup>b</sup>The U.S. Census Bureau has also referred to food insufficiency as food scarcity in the HPS.

<sup>c</sup>This indicator is sometimes referred to as use of community food and nutrition assistance. For the purposes of this report, we use the term "use of community food." The HPS also has a survey question about the use of community food, specifically the receipt of free groceries, but we focus on the estimates in the CPS-FSS as they allow for longer-term trend analyses.

<sup>d</sup>The survey questions on community food were revised substantially with the 2022 CPS-FSS data collection. The revised questions more broadly refer to the receipt of free groceries and free meals instead of the use of food pantries and emergency kitchens. The Economic Research Service recommends against comparing data or statistics from 2021 or earlier years to 2022 and later data.

Over time, USDA has taken steps to improve these indicators or measure food hardship more effectively. Specifically, USDA has worked to ensure that the underlying concepts and models for measuring food hardship are sound, collect data more rapidly with a lower respondent burden, and revise survey instruments. For example, in 2022, USDA revised survey questions for the use of community food indicator in response to feedback from Feeding America and others that the indicator likely underestimated the use of community nutrition assistance. The previous questions asked whether respondents ever got emergency food from a church, food pantry, or food bank and meals at a soup kitchen or shelter; the revised questions asked about receiving free groceries or meals from these sites. The U.S. Census Bureau conducted cognitive and split-panel testing to ensure survey respondents understood and accurately interpreted the revised questions and to measure differences in the rates at which households responded affirmatively to the previous and revised questions.<sup>18</sup> See appendix II for more information about how food hardship indicators have evolved over time.

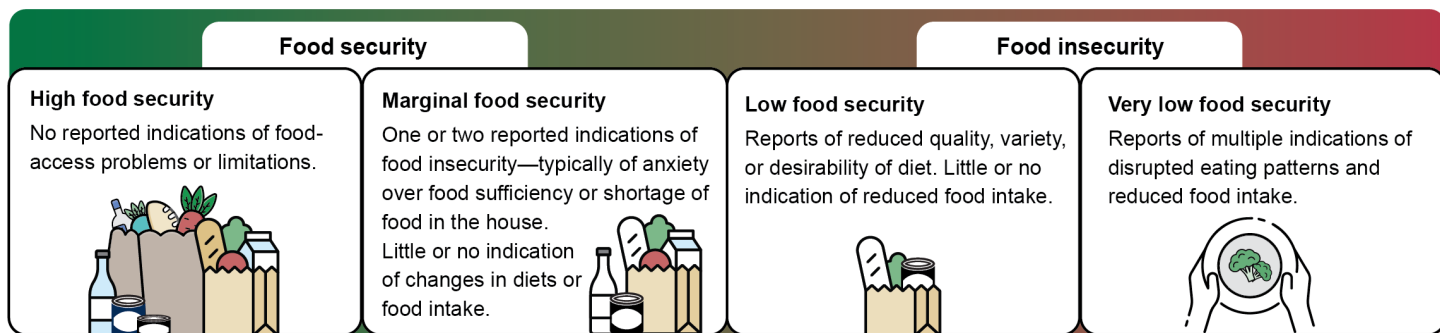
<sup>18</sup>In the split-panel test, half of respondents received the prior survey questions and half received the revised questions. The data were analyzed to assess performance of the revised questions.



Federal indicators of food hardship have various strengths and limitations, according to the Economic Research Service, researchers, and experts. For example, the indicators do not explain the causes of food hardship, nor were they designed to measure the effectiveness of federal nutrition assistance programs. According to the National Research Council, which has assessed the food security indicator, the indicator can help identify trends and levels of food hardship, as well as where additional assistance may be needed or reduced.<sup>19</sup> However, it is not a useful performance indicator for nutrition assistance programs because program performance is only one of many factors that impact food security. Other factors include overall fluctuations in the economy, changes in food prices, and changes in household income, which could include unemployment. See below for a discussion of trends for these indicators, as well as some examples of strengths and limitations.

**Food security.** Over time, food insecurity generally declined from an estimated 14.9 percent in 2011 to 10.2 percent in 2021 before increasing to 13.5 percent in 2023.<sup>20</sup> Very low food security remained more stable at around 4 to 6 percent over this period (see fig. 3 for definitions of the levels of food security and food insecurity).<sup>21</sup>

**Figure 3: Levels of Food Security and Food Insecurity**



Source: GAO analysis of U.S. Department of Agriculture (USDA) documents. | GAO-24-106539

<sup>19</sup>National Research Council, *Food Insecurity and Hunger in the United States: An Assessment of the Measure* (Washington, D.C.: The National Academies, 2006).

<sup>20</sup>All percentage estimates from Current Population Survey Food Security Supplement have margins of error at the 90 percent confidence level of no more than plus or minus 0.4 percentage points, unless otherwise noted.

<sup>21</sup>USDA also tracks low food security but does not calculate margin of error for it.

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### Examples of Survey Questions Used to Assess Food Security in the Current Population Survey Food Security Supplement

There are 10 survey questions for all households and an additional eight questions for households with children. The questions cover a range of severity of conditions and behaviors that characterize food insecurity.

Examples of questions include:

- We worried whether our food would run out before we got money to buy more. Was that often, sometimes, or never true for you in the last 12 months?
- We couldn't afford to eat balanced meals. Was that often, sometimes, or never true for you in the last 12 months?
- In the last 12 months, did you or other adults in the household ever cut the size of your meals or skip meals because there wasn't enough money for food?

Source: GAO analysis of U.S. Department of Agriculture documents. | GAO-24-106539

Strengths of the food security indicator include:

- **Validated.** The indicator has been evaluated and affirmed over time.<sup>22</sup>
- **Consistent.** The 18 survey questions that feed into the indicator have not changed substantially since they were created in 1995, which allows for long-term trend analysis.<sup>23</sup>
- **Representative.** The food security questions are a supplement to the broader Current Population Survey (CPS), which produces estimates that are representative at the national and state levels as well as analysis of those estimates by income, race and ethnicity, and household size.<sup>24</sup>
- **Standard.** Other countries and organizations use or adapt the food security survey and compare food security around the globe.<sup>25</sup> According to Economic Research Service officials, the food security indicator is easy to measure and easy to communicate, and the survey questions are straightforward. Experts described this indicator as the gold standard, adding that it was well defined.

Limitations of the food security indicator include:

- **Timing.** The food security questions ask individuals to respond based on their experiences over the preceding 12-month period, and this could make responses prone to error.<sup>26</sup> In addition, due to the annual nature of the CPS, it cannot account for changes in household income or household composition that may have occurred outside of the survey window but may have contributed to food insecurity. One

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<sup>22</sup>See app. II for more information.

<sup>23</sup>The CPS-FSS food security survey has 18 questions to measure food insecurity for households with children and 10 questions to measure food insecurity for households without children. Over time, and as recently as 2022, USDA has made minor revisions to the wording and ordering of questions.

<sup>24</sup>USDA's food security statistics are based on a national food security survey conducted as an annual supplement to the monthly CPS. The CPS is a nationally representative survey conducted by the U.S. Census Bureau for the Bureau of Labor Statistics. The CPS provides data for the nation's monthly unemployment statistics and annual income and poverty statistics.

<sup>25</sup>Irma Artega and Parke Wilde, "Measuring Food Security in the United States for More Than 25 Years: History, Methods, Findings, and Opportunities," *Journal of the Academy of Nutrition and Dietetics*, vol. 123, no. 10 (2023): S5–S19.

<sup>26</sup>National Research Council, *Food Insecurity and Hunger in the United States: An Assessment of the Measure* (Washington, D.C.: The National Academies, 2006).

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expert stated that the existing food security data do not allow for studying the dynamics of food insecurity—that is, how long individuals and households experience food insecurity within and across years.

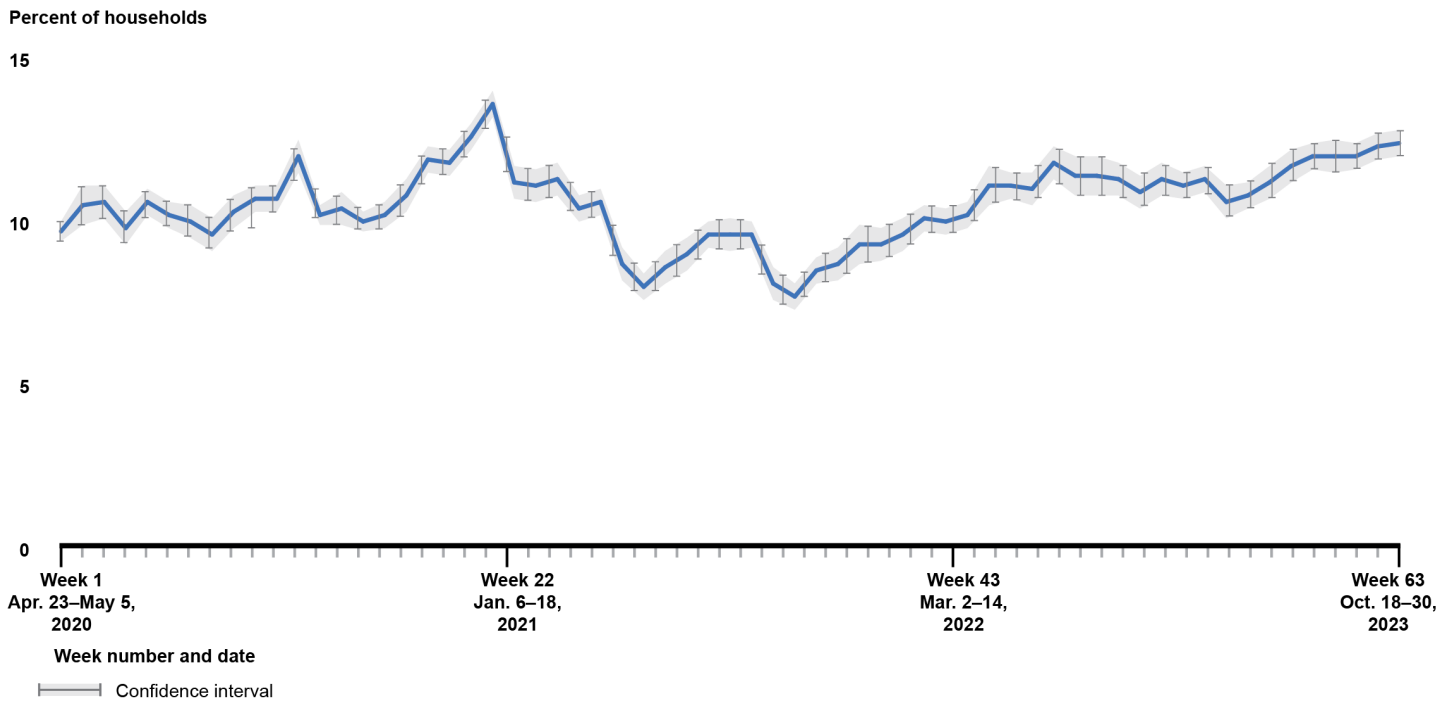
- **Scope.** The CPS measures food security at the household, not the individual, level. Additionally, the CPS, like most household surveys, excludes individuals experiencing homelessness if they are not living in shelters. Further, Economic Research Service officials said that the indicator does not effectively ascertain respondents' nutrition quality due to the complexity and varying perceptions of nutrition. Ultimately, food security is a measure of economic access to food, correlating somewhat with health, that lacks depth on nutrition.

**Food sufficiency.** Over a roughly 3-year period from 2020 to 2023, food insufficiency rates for U.S. households ranged from an estimated high of 13.7 percent in December 2020 to an estimated low of 7.8 percent in August 2021 before increasing to 12.5 percent in October 2023 (see fig. 4).<sup>27</sup>

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<sup>27</sup>All percentage estimates from the Household Pulse Survey have margins of error at the 90 percent confidence level of no more than plus or minus 0.6 percentage points, unless otherwise noted.

**Figure 4: Prevalence of Food Insufficiency in U.S. Households, 2020–2023**



Source: GAO analysis of U.S. Census Bureau data. | GAO-24-106539

Note: There are four levels of food sufficiency: full food sufficiency, marginal food sufficiency, low food sufficiency, and very low food sufficiency. Low and very low food sufficiency are classified as food insufficient. All percentage estimates from the Household Pulse Survey have margins of error at the 90 percent confidence level of no more than plus or minus 0.6 percentage points, unless otherwise noted.

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**Survey Question Used to Assess Food Sufficiency in the Household Pulse Survey**

- “In the last 7 days, which of these statements best describes the food eaten in your household? Select only one answer: (1) Enough of the kinds of food (I/we) wanted to eat; (2) Enough, but not always the kinds of food (I/we) wanted to eat; (3) Sometimes not enough to eat; (4) Often not enough to eat.”

Responses of (3) or (4) are classified as food insufficient.

Source: GAO analysis of U.S. Department of Agriculture documents. | GAO-24-106539

Strengths of the food sufficiency indicator include:

- **Low burden.** Data for the food sufficiency indicator are collected through the Household Pulse Survey (HPS) via a single question, which reduces the burden for the respondent.<sup>28</sup> According to the Economic Research Service, advantages of the food sufficiency indicator are that it is short, easy to administer, and easy to interpret.
- **Recency.** The survey question asks the respondent about the last 7 days, which may mitigate some potential recall error.
- **Consistent.** The Economic Research Service and an expert noted that the food sufficiency indicator has been in use for many years.

Limitations of the food sufficiency indicator include:

- **Precision.** According to the Economic Research Service, because the food sufficiency indicator is based on responses to a single survey question, it is a less precise and detailed indicator than the food security indicator.<sup>29</sup> The food sufficiency question provides relatively little detail on the food hardship experienced and indicates only whether a household had enough to eat. One expert said that the HPS does not account for the lag between losing income and not having enough to eat. Another expert stated that the current question is problematic because it asks the respondents to score themselves on two different dimensions—quantity and quality of available food—that may not move together.
- **Response rates.** According to the Economic Research Service, response rates varied across weeks of the HPS data collection from 1 percent to 10 percent. Relatively low and variable response rates to

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<sup>28</sup>The U.S. Census Bureau designed the HPS to collect data to measure how emergent issues affect U.S. households from a social and economic perspective. Food insufficiency was included in this survey to assess the nation’s well-being during COVID-19. The HPS, an experimental data product, is an interagency federal statistical rapid response survey to measure household experiences during the COVID-19 pandemic. The survey is conducted by the U.S. Census Bureau in partnership with multiple other federal agencies.

<sup>29</sup>Significant overlap exists between food security and food sufficiency; most households classified as having low food security were also classified as having marginal food sufficiency.

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the HPS may have resulted in nonresponse bias that affects the food sufficiency estimates.<sup>30</sup>

- **Timing.** Like the CPS, the HPS also does not follow households over time and cannot account for changes that may contribute to food insufficiency.

**Use of community food.** In 2023, an estimated 7.1 percent of households overall received free groceries, but the rates were much higher for food-insecure households (an estimated 30.5 percent of food insecure households and 39.5 percent of households with very low food security received free groceries).<sup>31</sup>

#### Revised Survey Questions for Use of Community Food

As of 2022, the Current Population Survey Food Security Supplement survey questions on use of community food were updated to the following:

- “In the last 12 months, did you or anyone in your household ever get free groceries from a food pantry, food bank, church, or other place that helps with free food?”
- “In the last 12 months, have (you/you or anyone in your household) received a free meal from a church, shelter, home-delivered meal service like Meals on Wheels, or other place that helps with free meals?”

Before 2022, the questions asked about receipt of emergency food from a church, food pantry, or food bank and meals at a soup kitchen or shelter.

Source: GAO analysis of U.S. Department of Agriculture documents. | GAO-24-106539

Strengths of the use of community food indicator include:

- **Precise.** As previously discussed, USDA and the U.S. Census Bureau modified the survey questions in 2022. One expert agreed that the modifications were an improvement and said that a strength of the new survey questions for this indicator is that framing the questions in terms of free groceries or free meals increases the chances that people will see themselves in the question.
- **Representative.** Because use of community food is a component of the Current Population Survey Food Security Supplement, this indicator has many strengths in common with the food security indicator, such as producing estimates that are representative at the national and state levels, among others.

Limitations of the use of community food indicator include:

- **Timing and scope.** This indicator also shares limitations with the food security indicator, such as the potential for recall error, providing limited information about causal factors, and measuring food security at the household, not an individual, level, among others.

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<sup>30</sup>In March 2021, the U.S. Census Bureau published the results of a nonresponse bias analysis for the 2020 HPS that identified evidence of response patterns that could result in biased estimates. The U.S. Census Bureau adjusted sampling weights, which can help but may not completely mitigate nonresponse bias.

<sup>31</sup>Households with very low food security are a subgroup of food insecure households. These estimates have margins of error at the 90 percent confidence level of no more than plus or minus 2.7 percentage points.

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## USDA Is Developing a New Indicator of Nutrition Security

USDA is currently developing an indicator for nutrition security, which is focused on the consistent and equitable access to healthy, safe, and affordable foods essential to optimal health and well-being.<sup>32</sup> Officials told us that the Economic Research Service, the agency within USDA spearheading this effort, is at the beginning of what could be a 5-year effort to develop this framework.<sup>33</sup> In the meantime, USDA and FNS have incorporated a focus on nutrition security into their mission and programming. For example, addressing nutrition security is a key priority in USDA's fiscal year 2022–2026 strategic plan.

In terms of developing the framework, the Economic Research Service is working to create a reliable measurement method for the nutrition security indicator. Officials in the Economic Research Service said that the goal is to examine not only the extent to which people have access to food, but also the extent to which they have enough access to nutritious foods. They said that nutrition security, like food sufficiency, could be considered a dimension of food security, and the nutrition security indicator would therefore build on—and complement—the existing food security indicator. One expert said that progress has been made in eliminating hunger, and attention should be shifted from the quantity of the diet to the quality of the diet. Another expert stated that the intention in developing this new indicator is to allow researchers and policymakers to talk more broadly about the drivers of diet-related chronic disease.

Economic Research Service officials also noted potential challenges in the development of the new indicator, including diverse food habits and a complex food supply, and that disagreement exists within the food and nutrition policy community regarding the definition of nutrition security, how to measure it, or how to use it. One expert said that using survey data to measure nutrition security is challenging because there are unobservable differences in subjects' views of what is healthy. The expert added that it is difficult to make inferences based on those different views, and there is inherent measurement error.

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<sup>32</sup>According to the Economic Research Service, the current working definition includes consistent access, availability, and affordability of foods and beverages that promote well-being; prevent disease; and, if needed, treat disease, particularly among racial/ethnic minority, lower-income, and rural and remote populations, including tribal communities and insular areas.

<sup>33</sup>The Economic Research Service aims to define nutritious foods within the existing Dietary Guidelines for Americans, which are a statement of federal dietary policy.

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## FNS Conducts Various Oversight Activities to Help States and Local Agencies Operate TEFAP and CSFP, but Gaps Exist

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### FNS Oversees States through Monitoring Operations, Written Guidance, Technical Assistance, and Information Sharing

The FNS national office and seven regional offices oversee TEFAP and CSFP by monitoring state operations, as well as by providing various types of assistance to states (see fig. 5).<sup>34</sup> The FNS national office issues federal regulations, policy memos, question and answer documents, and other types of written guidance. National officials said they also play a role in facilitating information sharing, such as through annual conferences.<sup>35</sup> The regional offices are primarily responsible for overseeing states, according to national officials. Regional officials said they conduct periodic management evaluations, gather and monitor program data, and review state plans.<sup>36</sup> Regional officials said they also provide technical assistance to states, such as day-to-day support for food orders and deliveries, as well as policy clarifications. In addition, regional officials said they facilitate information sharing, such as through regular calls with states.<sup>37</sup> State agencies are generally responsible for all

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<sup>34</sup>In spring 2023, FNS reorganized its regional offices and created a new branch for food distribution programs—which includes TEFAP and CSFP. Each regional office has a director and branch chief dedicated to supporting food distribution programs. FNS officials said this reorganization will allow regional offices to focus more on TEFAP and CSFP oversight.

<sup>35</sup>In addition, national officials said they provide a monthly summary of program information and reminders related to food ordering and deliveries as well as a weekly summary of order cancellations due to procurement shortfalls. The national office also provides recorded webinar videos on the FNS website and quarterly “USDA Foods from Farm to Plate” e-letters that feature resources, news, and best practices.

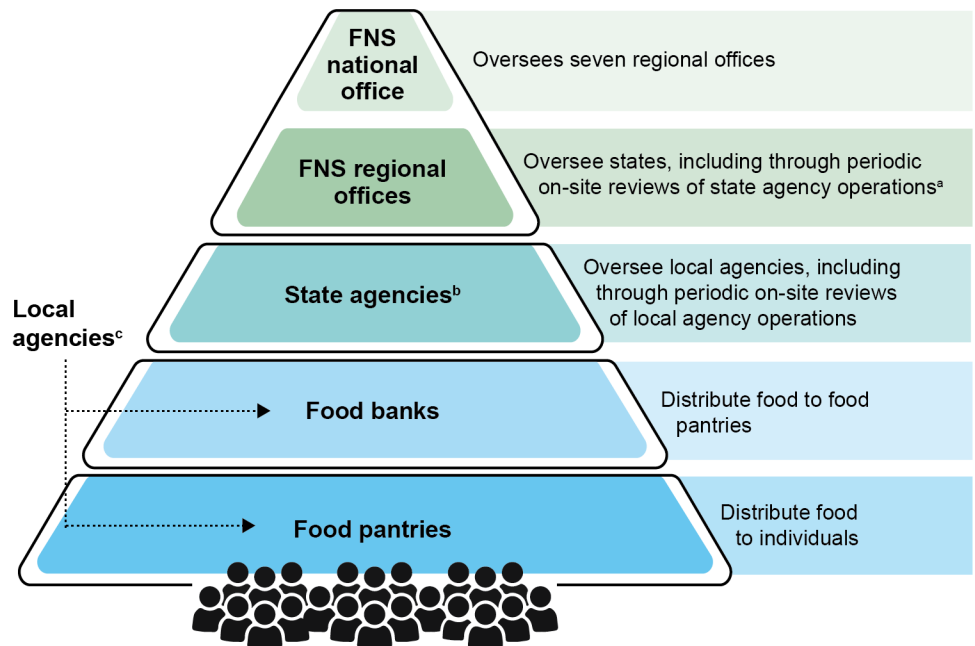
<sup>36</sup>The purpose of a management evaluation is to assess the state agency’s compliance with federal program regulations, instructions, and policies and to provide technical assistance. Regional offices aim to conduct management evaluations for TEFAP and CSFP for each state once every 5 years, according to FNS officials.

<sup>37</sup>The frequency of calls with states varied among six regional offices, according to regional officials. Officials from the seventh regional office said they used to have quarterly calls but paused them due to staffing changes.



aspects of TEFAP and CSFP administration, including contracting with and overseeing the local agencies that receive, store, and distribute TEFAP and CSFP food, according to national officials.

**Figure 5: The Emergency Food Assistance Program (TEFAP) and the Commodity Supplemental Food Program (CSFP) Oversight**



Source: GAO analysis of Food and Nutrition Service (FNS) documents and information from officials from the FNS national office and regional offices. | GAO-24-106539

Note: This figure does not detail all federal and state oversight activities. See the background section of this report for more information.

<sup>a</sup>FNS regional office on-site reviews of state agency operations are called management evaluations. As part of management evaluations, regional officials typically conduct an on-site visit to at least one local agency that stores and distributes food.

<sup>b</sup>For the purposes of this report, we use the term “state agencies” to refer to “state distributing agencies” that administer TEFAP and CSFP.

<sup>c</sup>For the purposes of this report, we use the term “local agencies” to refer to the local agencies that participate in CSFP and the “recipient agencies” that participate in TEFAP. TEFAP food is typically distributed through food pantries, soup kitchens, shelters, Tribes and tribal organizations, and other public and nonprofit organizations. CSFP food packages are typically distributed through local agencies that may include food banks, food pantries, community action agencies, Tribes and tribal organizations, and other nonprofit organizations, but not typically by soup kitchens.

State agency officials we interviewed from all three selected states said FNS regional officials were responsive and helpful; they said they had more limited or no interaction with FNS national officials. For example, officials from one selected state said regional officials are always readily available, supportive, and easy to work with. Officials from two selected

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states also said regional officials provided training, such as statewide training or training for new state agency officials.

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## FNS Guidance Is Not Consolidated and User Friendly

FNS does not provide consolidated and user-friendly guidance for TEFAP and CSFP to states and local agencies, such as a program handbook, according to officials we spoke with. National officials said federal regulations are the primary guidance and that they are supplemented by FNS's written guidance, such as policy memos and instructions, which is provided on the FNS website.

However, officials we spoke with identified the following issues with FNS guidance for TEFAP and CSFP:

- **Hard to find on the FNS website.** Officials from six of seven regional offices and a representative of the American Commodity Distribution Association said it can often be hard to find program-specific policy memos or other guidance because the FNS website and its search functionality are difficult to navigate.<sup>38</sup> For example, a user searching for policy memos on the FNS website will be shown 80 TEFAP policy memos or 61 CSFP policy memos.<sup>39</sup> A user searching for guidance documents will be shown 69 TEFAP guidance documents or 46 CSFP guidance documents.<sup>40</sup>
- **Not user friendly.** Officials from four of seven regional offices said regulations and policy memos are not always user friendly or easy to understand. For example, officials from one regional office said states are often unsure if they are correctly interpreting policy memos and would benefit from program guidance that is written in plain language.
- **Lack of guidance for local agencies.** There is little-to-no FNS guidance directed specifically at local agencies, according to officials from the national office and five regional offices, even though local agencies operate the programs, often with significant support from

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<sup>38</sup>The American Commodity Distribution Association is a nonprofit professional association for USDA food distribution programs. See app. I for more details on how we gathered information from state agency officials, including selected states and state agency members of the American Commodity Distribution Association.

<sup>39</sup>FNS has specific webpages for TEFAP and CSFP with links to policy memos, but the links for policy memos direct the website user to the central "FNS Documents and Resources" webpage where the user will be presented with all policy memos for that specific program. We conducted these searches on the FNS website on July 15, 2024.

<sup>40</sup>We conducted these searches on the FNS website on July 12, 2024. These search results are subject to change over time.

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volunteers who may be unfamiliar with policies and procedures. Some state agencies have created their own handbooks for local agencies, but they are of varying quality, according to officials from one regional office, a state agency, and a selected food bank.<sup>41</sup>

Officials from one selected state and two other state agencies said it would be helpful for FNS to provide consolidated and user-friendly guidance for states and local agencies. One of these officials said improved and easy-to-find local agency guidance would ensure all local agencies receive the same information from FNS. This official also said improved state agency guidance would provide consistency across states since federal regulations are open to interpretation. Similarly, an official from a selected food bank that operates in multiple states said he observed a wide variation in the interpretation of federal regulations across states, which the official said can lead to contradictory findings during state on-site reviews of local agencies. This food bank official said it is important that states use consistent criteria that accurately reflect federal program requirements because food banks face consequences if they are not in compliance, which may impede their ability to serve their clients.<sup>42</sup>

FNS officials said they do not provide consolidated guidance for TEFAP and CSFP because states have discretion in how they implement these programs, particularly TEFAP.<sup>43</sup> Further, officials from one regional office said FNS does not want to make prescriptive guidance that could circumvent or impede a state's ability to administer TEFAP or CSFP as the state wants. In addition, national officials said states have not requested consolidated and user-friendly guidance, but they acknowledged that FNS has not explicitly asked states if such guidance would be helpful.

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<sup>41</sup>For example, a state agency official said officials in the state manually go through regulations and policy memos to construct a handbook for their local agencies but noted it is easy to miss information and that they have missed regulatory updates. In addition, errors in state handbooks can have a ripple effect when states base their handbooks on those of other states, as state agency officials from one selected state and another state said they did.

<sup>42</sup>This food bank conducted a TEFAP study and made policy recommendations to FNS including clarifying guidance for food banks regarding a few operational elements of TEFAP, such as interstate service and distribution flexibilities.

<sup>43</sup>A national official said TEFAP regulations are relatively short to give states discretion in operating the program and that CSFP regulations are more prescriptive and written in a question and answer format to make them as clear as possible.

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While states have discretion in some program elements, such as eligibility criteria, there are many program elements for TEFAP and CSFP that are the same across the states per regulation and FNS instructions, such as elements related to state monitoring activities, required reports, record keeping, and the escalation of issues with spoiled or damaged food.<sup>44</sup> Further, FNS provides consolidated guidance for other nutrition assistance programs that are administered by state agencies and operated by local entities, such as the Child and Adult Care Food Program.<sup>45</sup>

USDA and FNS goals and priorities, as well as federal standards for internal control and federal plain language guidelines, emphasize the need for clear external communication to administer programs effectively.<sup>46</sup> Further, federal internal control standards outline that management should externally communicate the necessary quality information—information that is appropriate, current, complete, accurate, accessible, and provided on a timely basis—to achieve its objectives. Lastly, with regard to creating guidance for states and local agencies

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<sup>44</sup>In a related report on the USDA Foods in Schools Program, another USDA food distribution program, we found that several states identified a need for additional assistance from FNS, including additional written communications, to help them operate the program effectively. We recommended that USDA identify and share with states promising practices and lessons learned, for example, by creating a repository or toolkit on the agency’s website, and FNS officials agreed with the recommendation. See GAO, *School Meals: USDA Should Address Challenges in Its “Foods in Schools” Program*, [GAO-23-105697](#) (Washington, D.C.: June 14, 2023). In February 2024, FNS officials said they could consider whether the repository can include and apply to TEFAP and CSFP. However, they did not commit to taking such action for TEFAP and CSFP and did not provide any details on their plan.

<sup>45</sup>For example, FNS provides consolidated guidance for the Child and Adult Care Food Program (CACFP) on FNS webpages with links to handbooks for different stakeholders, including monitoring guidance for state agencies and operational guidance for local entities. See U.S. Department of Agriculture, Food and Nutrition Service, “CACFP Handbooks” (Sept. 21, 2023), accessed December 8, 2023, <https://www.fns.usda.gov/cacfp/cacfp-handbooks>.

<sup>46</sup>USDA’s strategic plan calls for the agency to use “new communication mechanisms, to . . . administer programs as effectively as possible to serve targeted populations.” U.S. Department of Agriculture, *Strategic Plan: Fiscal Years 2022-2026* (March 2022). Further, FNS has an internal agency priority to “improve program performance through a culture of innovation, process analysis, and improvement.” As part of the agency priority, FNS has a fiscal year 2024 goal to invest in innovative approaches to improve program performance and customer service.

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separately, federal plain language guidelines encourage agencies to identify the audience and address audiences separately.<sup>47</sup>

Without consolidated, user-friendly guidance, state and local agencies may be confused about program requirements, and state oversight of TEFAP and CSFP may be inconsistent. By providing such guidance, FNS could better support states and local agencies so they can effectively operate TEFAP and CSFP, which in turn supports more effective food distribution to individuals in need.

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## The Process to Address Out-of-Condition Food Is Lengthy

Many of the local agencies we interviewed said they appreciated the food they received from TEFAP or CSFP and that TEFAP food in particular is generally high quality, but other officials reported challenges addressing deliveries of out-of-condition food in a timely manner.<sup>48</sup> These officials—including officials from all seven regional offices, an American Commodity Distribution Association representative, a selected state agency, and four other state agencies—described a lengthy and inefficient process to deal with out-of-condition food.

There are various reasons a food delivery may be out-of-condition, and different types of food have been affected. Out-of-condition food issues can be related to food safety, product condition, packaging, truck security seals, load shifts, and product temperature, according to FNS. Some TEFAP and CSFP food deliveries have resulted in reports of chicken in “stinky, bloody boxes;” “rotting, leaking bags” of sweet potatoes; moldy produce; and corroded or leaking cans, according to our analysis of recent USDA Foods complaint data.<sup>49</sup>

Regional officials help state agencies report out-of-condition food issues to the FNS national office, and the national office works with the

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<sup>47</sup>USDA, *Plain Language Writer’s Checklist*, accessed on July 18, 2024; and Plain Language Action and Information Network, *Federal Plain Language Guidelines* (March 2011). For both documents, see U.S. Department of Agriculture, “Plain Language Writing in USDA,” <https://www.usda.gov/plain-writing>.

<sup>48</sup>Out-of-condition food is no longer fit for human consumption as a result of spoilage, contamination, infestation, adulteration, or damage, according to FNS regulation. 7 C.F.R. § 250.2.

<sup>49</sup>These allegations were listed in complaint data gathered between October 1, 2021, and January 31, 2023, in the Web-Based Supply Chain Management system. The Web-Based Supply Chain Management system is the ordering, procurement, distribution, and tracking system for USDA Foods.

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Agricultural Marketing Service (AMS) to resolve these issues.<sup>50</sup> The FNS national office works with AMS to address out-of-condition food because it may involve issues with the vendor fulfilling its contract requirements, and AMS manages the contracts with the USDA-approved vendors that supply and deliver USDA Foods.<sup>51</sup> AMS also manages the Web-Based Supply Chain Management system, which state agencies can use to report instances of out-of-condition food. AMS requires sufficient photographic or video documentation of the out-of-condition food to assess the problem and then decides how to address it, which could involve rejecting the delivery, replacing the out-of-condition food, or seeking another remedy, according to AMS officials.

Officials from six of the seven regional offices said much of the day-to-day technical assistance they provide to states is related to food order issues, including issues with out-of-condition food.<sup>52</sup> Officials from one regional office said they operate like a help desk for issues related to food orders and out-of-condition food, which they said is a competing priority for the four staff members who also conduct management evaluations for all food distribution programs in the region. Officials from another regional office said they address problems related to food deliveries daily, and while they work with food banks to ensure there is adequate documentation before escalating to the national office, sometimes AMS says the documentation is insufficient.

FNS and AMS officials said there are two ways they address spoiled, damaged, or otherwise out-of-condition USDA Foods deliveries depending on when the issue is discovered.<sup>53</sup> If out-of-condition food is

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<sup>50</sup>The FNS national office does not escalate all reports of out-of-condition food to AMS but rather uses its own criteria to determine which reports are sent to AMS for resolution. See app. III for more information.

<sup>51</sup>For the purposes of this report, we focus on USDA processes to address out-of-condition food shipments that originate from a vendor. See FNS Instruction 709-5 for more details about how out-of-condition food is handled when it originates from a federally contracted storage facility, known as a National Multi-Food Warehouse.

<sup>52</sup>The FNS national office also operates a USDA Foods Complaint hotline that states and food banks can call for assistance with reporting out-of-condition food in the Web-Based Supply Chain Management system, according to national officials. However, national officials said out-of-condition food issues cannot be resolved during a call to the hotline because requests from food banks to reject, dispose of, or replace out-of-condition food must be resolved in coordination with AMS.

<sup>53</sup>AMS officials said they receive and review any concerns that a USDA Foods delivery does not meet contractual requirements, which may or may not be tied to the condition of the food itself.

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discovered prior to unloading the delivery truck, it is considered a delivery issue, but if the out-of-condition food is discovered after unloading the delivery truck, it is considered a complaint and handled through a different process.<sup>54</sup> See appendix III for more information about how FNS and AMS manage delivery issues and complaints differently.

**Delivery issues.** AMS considers delivery issues to be more time sensitive than complaints. AMS officials said this is because (1) delivery trucks must wait for a response from AMS before they can unload the truck, and the delivery contractor may incur additional costs during that time, and (2) food banks can be negatively affected while the delivery truck is occupying space on their loading dock.

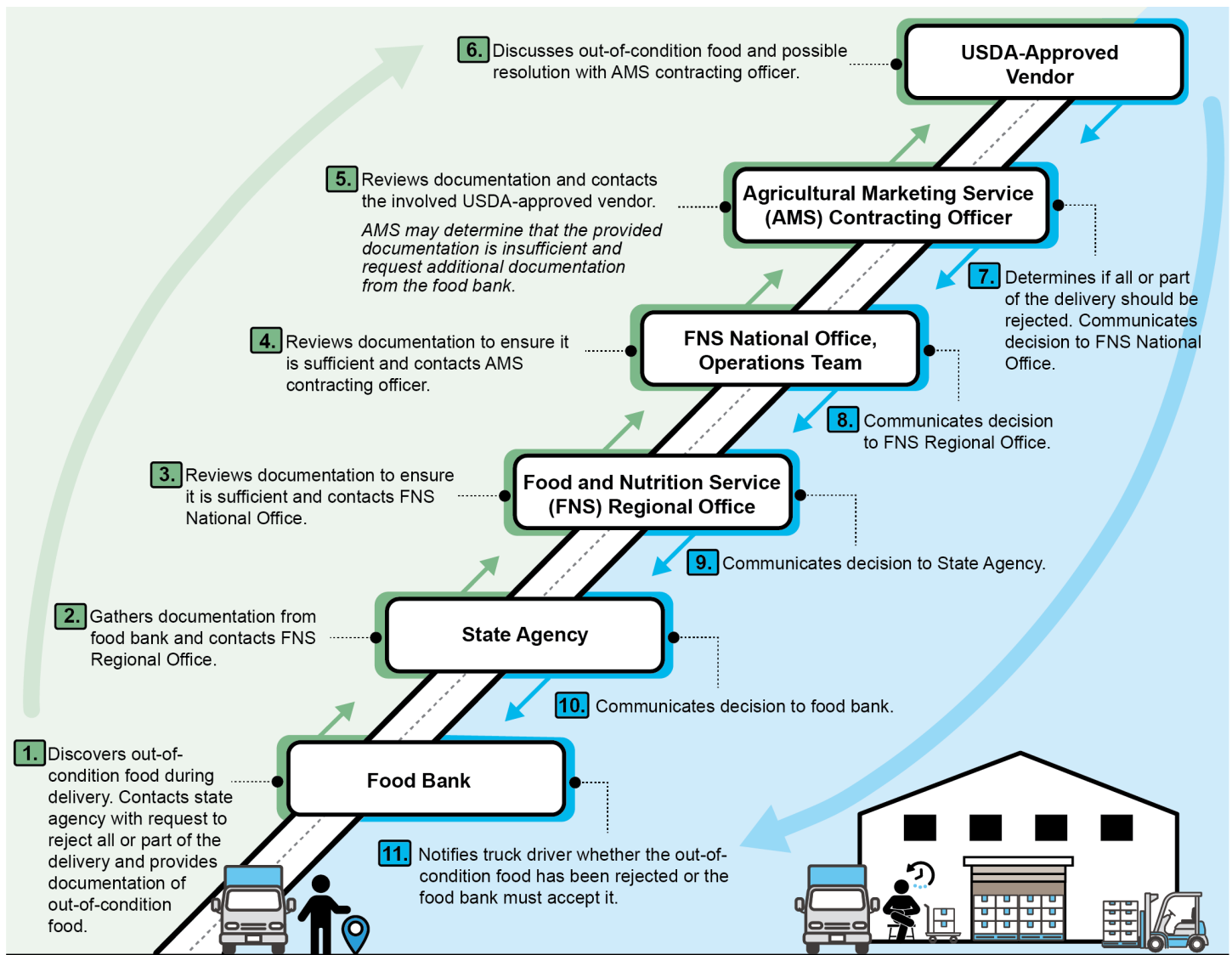
Without a timely resolution to delivery issues, food banks can experience inefficiencies or tense interactions, according to officials from six regional offices, two selected states, two other state agencies, and an American Commodity Distribution Association representative. For example, officials from one regional office said it could take anywhere from 1–2 hours to all day to receive a decision from AMS. Similarly, an official from one selected state said trucks with spoiled food have waited on the loading dock for up to 8 hours while the food bank waited for approval to reject the delivery, and other trucks could not access the loading dock during that time.<sup>55</sup> Further, officials from this state, two other state agencies, and a regional office described situations in which food bank staff found themselves in a hostile situation with a disgruntled truck driver while waiting for AMS's response. See figure 6 for more details on the escalation process.

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<sup>54</sup>FNS instructs that before accepting a delivery, food banks (1) inspect the security seal on the truck, (2) check the product temperature, (3) verify the quantity, and (4) examine the quality and condition of the product and packaging.

<sup>55</sup>Additionally, in 2022, we conducted a national survey related to the USDA Foods in Schools program and found that several states reported needing more timely communication from FNS related to USDA Foods orders, including an example where one state received a truckload of damaged product and had to wait several hours for word from FNS to reject the product, which frustrated the delivery driver, distributor, and state officials. We recommended that FNS establish guidelines for timely communication with states on the USDA Foods in Schools program, and FNS officials agreed with this recommendation. See [GAO-23-105697](#). In February 2024, FNS officials said that all FNS national office staff with food ordering responsibilities have a performance element related to timeliness beginning in fiscal year 2024. However, they did not describe specific actions to streamline the escalation process to address delivery issues.

**Figure 6: U.S. Department of Agriculture (USDA) Escalation Process for Delivery Issues**



Source: GAO analysis of FNS Instruction 709-5 and information provided by officials from the FNS national office, FNS regional offices, and AMS. | GAO-24-106539

Note: For the purposes of this figure, we focus on food shipments that originate from a vendor. Per FNS Instruction 709-5, food banks do not need to follow this escalation process if (1) a delivery truck arrives with a broken or missing security seal, or (2) the serial number on the security seal does not match delivery documentation, and instead food banks must refuse the shipment without waiting for AMS approval. However, the food bank must still notify AMS of these issues with the security seal by providing that information up the chain of communication to AMS.

**Complaints.** AMS officials said it often takes longer to resolve complaints because AMS must determine how the food became out-of-condition and may need to take legal action with the vendor. AMS has a goal of



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resolving complaints it receives through the Web-Based Supply Chain Management system within 18 business days, but not all complaints reported in the system are sent to AMS.<sup>56</sup> FNS uses its own criteria to decide which complaints in the system are escalated to AMS. When FNS closes a complaint without escalating to AMS, they do not automatically notify food banks, which may add to the perception of lengthy response times.<sup>57</sup> Officials from two regional offices and two state agencies said states and food banks sometimes do not receive a response to a complaint for months. For example, officials from one regional office said it can take 3 months to hear back from the national office and that the out-of-condition food takes up valuable refrigeration or freezer space until a decision is made because the food bank cannot dispose of USDA Foods without permission from FNS.<sup>58</sup> A state agency official said she has not received a response to some complaints for up to a year.

FNS and AMS officials said delivery issues and complaints affect a small percentage of TEFAP and CSFP food deliveries, although they lack comprehensive data about all delivery issues.<sup>59</sup> Nevertheless, FNS officials have acknowledged that they have received feedback from state and local officials about lengthy response times for resolving delivery issues and complaints. AMS officials said the delays in responding to these issues are primarily due to problems with transmitting and receiving complete and timely information between all involved parties. For example, AMS officials said they sometimes receive insufficient documentation from food banks, such as a photo of a single box of spoiled food instead of multiple pictures of different boxes of food that

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<sup>56</sup>The Web-Based Supply Chain Management system is the system of record for USDA Foods complaints, according to FNS officials.

<sup>57</sup>FNS officials said states can check the Web-Based Supply Chain Management system to see the status of a complaint using the unique complaint number.

<sup>58</sup>AMS resolves complaints regarding out-of-condition food and communicates the resolution with FNS so it can be communicated to the state and local agencies, according to AMS officials. Per regulation, local agencies may not dispose of USDA Foods that are the subject of a complaint prior to authorization from FNS. See 7 C.F.R. § 250.15(d).

<sup>59</sup>FNS officials said they encourage states to enter delivery issues in the Web-Based Supply Chain Management system after the fact, but that it is not required. AMS officials said they use Domestic Order Delivery Details reports from that system to analyze delivery issues with a particular vendor or conduct other ad hoc analysis of delivery issues. AMS officials also said that, more generally, they use Web-Based Supply Chain Management system information to determine vendor performance before awarding new contracts to vendors.

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document the extent of spoilage.<sup>60</sup> AMS officials acknowledged there is room for improvement in the chain of communication from the food bank to AMS and said there can be challenges when a lot of different people are involved. However, they noted that more direct lines of communication could leave out officials who need to be kept in the loop.<sup>61</sup>

AMS and FNS officials said they have taken some steps to streamline the process for addressing delivery issues. Specifically, in April 2024, FNS and AMS revised a key guidance document (FNS Instruction 709-5) to include a list of the information required to report a delivery issue and a 2-hour time limit for AMS to resolve the issue.<sup>62</sup> However, FNS and AMS officials said that the 2-hour time limit does not start until AMS receives complete and sufficient documentation of the out-of-condition food, which has been a main reason for delays. In addition, the new timeframe for AMS does not address the overall lengthy chain of communication between the food bank and AMS. FNS officials said they are considering establishing a direct contact in the FNS national office for food banks to contact or allowing food banks to skip the step of contacting their state agency. However, neither FNS nor AMS have a written plan or timeframes for developing and implementing an overall streamlining solution to the lengthy escalation process.

FNS officials also said they would like to shorten the time for resolving complaints, but FNS and AMS officials said they do not have specific

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<sup>60</sup>AMS officials said they do not track how often they receive insufficient documentation from the food bank or state agency.

<sup>61</sup>According to USDA, in the late spring and summer of 2024, contractor delays and supply chain issues disrupted food deliveries for CSFP and another USDA program, the Food Distribution Program on Indian Reservations. These disruptions, which included reports of expired food, involved food shipments from a federally contracted storage facility, known as a National Multi-Food Warehouse, not from USDA-approved vendors. USDA reported developing an “all-hands response” that included establishing a dedicated team of staff from across the agency to provide one-on-one assistance to every CSFP state agency and Food Distribution Program on Indian Reservations agency. USDA also offered guidance to local agencies and short-term options to help communities’ access food as quickly as possible, including making use of TEFAP, while the agency worked to develop a permanent plan to ensure a steady and reliable supply of food.

<sup>62</sup>Per the updated FNS Instruction 709-5, food banks can refuse a shipment if AMS does not resolve the issue within 2 hours. The 2-hour time limit applies to shipments originating from a USDA-approved vendor and not for shipments originating from a federally contracted storage facility.

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plans to streamline the process.<sup>63</sup> In May 2024, FNS officials said they are working with the Web-Based Supply Chain Management system contractor to determine options for automatic notifications to states when the complaint status in that system changes. In September 2024, FNS officials said they aim to complete this update in October 2024.

USDA and FNS goals and priorities, as well as federal internal control standards, emphasize analyzing program processes and making needed improvements.<sup>64</sup> USDA's strategic plan calls for the agency "to be a data-driven, customer experience-centered, learning organization that embraces innovation...builds an infrastructure for the challenges of today and tomorrow, insists on continuous improvement, and listens to feedback." FNS also has an internal agency priority to improve results and program performance through a culture of innovation, process analysis, and improvement.<sup>65</sup>

Without a streamlined way to address delivery issues and complaints, food banks and regional offices will continue to expend resources and time inefficiently to address out-of-condition food. A streamlined process could help food banks focus on distributing food in their community and help FNS focus resources on other important oversight activities, such as management evaluations and providing policy guidance.

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## FNS Has Set Agency Priorities but Does Not Have Specific Performance Goals, Measures, or Evaluations for TEFAP and CSFP

Although FNS has agency priorities that align with USDA strategic goals, FNS has not established a program performance assessment system that sets goals and measures progress toward meeting those goals for TEFAP and CSFP. GAO has previously reported that a program performance assessment system is an important component of effective program management and contains three key elements:

1. **Program goals** communicate what an agency proposes to accomplish and allow the agency to assess or demonstrate the degree to which those desired results were achieved.

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<sup>63</sup>FNS and AMS officials said they have regular communication and collaborate on a continual basis to improve the complaint process.

<sup>64</sup>Federal internal control standards specify that management should identify, analyze, and respond to risks related to achieving defined objectives and additionally document changes to internal controls.

<sup>65</sup>As part of this priority, FNS has a fiscal year 2024 goal to invest in innovative approaches to improve program performance and customer service.

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- Strategic goals and related objectives are long-term goals that set a general direction for a program’s efforts.
  - Performance goals are the specific results an agency expects its program to achieve in the near term.
2. **Performance measures** are concrete, objective, observable conditions that permit the assessment of progress made toward the agency’s goals. Performance measures show the progress the agency is making in achieving performance goals.
  3. **Program evaluations** are individual systematic studies using performance measures and other information to answer specific questions about how well a program is meeting its objectives.<sup>66</sup>

Because FNS does not carry out these key steps for TEFAP and CSFP, such as developing specific performance goals, it lacks critical information about how well these programs are working relative to their intended purpose.

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## FNS Sets Agency Priorities but Does Not Have Results-Oriented Performance Goals for TEFAP and CSFP

FNS has agency priorities that align with USDA strategic goals. For instance, one agency priority is to ensure equitable and consistent access to FNS programs for eligible populations. FNS officials stated that these priorities are broken down into objectives for regional office support. FNS has also articulated priorities for TEFAP and CSFP including:

- increasing access and parity within the food distribution programs through the rulemaking process;<sup>67</sup>
- providing technical assistance for TEFAP through nutrition education, such as resources for state agencies on identifying and offering kosher and halal foods through the program; and

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<sup>66</sup>GAO, *Veterans Justice Outreach Program: VA Could Improve Management by Establishing Performance Measures and Fully Assessing Risks*, [GAO-16-393](#) (Washington, D.C.: Apr. 28, 2016). See also: GAO, *Program Evaluation: Strategies to Facilitate Agencies’ Use of Evaluation in Program Management and Policy Making*, [GAO-13-570](#) (Washington, D.C.: June 26, 2013); *Performance Measurement and Evaluation: Definitions and Relationships*, [GAO-11-646SP](#) (Washington, D.C.: May 2011); and *Managing for Results: Enhancing Agency Use of Performance Information for Management Decision Making*, [GAO-05-927](#) (Washington, D.C.: Sept. 9, 2005).

<sup>67</sup>In August 2023, the Food and Nutrition Service published a proposed rule in the Federal Register entitled “Food Distribution Programs: Improving Access and Parity.” 88 Fed. Reg. 54,908 (Aug. 14, 2023).

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- expanding TEFAP's reach in remote, rural, tribal, or low-income areas through its TEFAP Reach and Resiliency Grant Initiative.<sup>68</sup>

However, FNS's overall priorities related to TEFAP and CSFP are not the same as performance goals because they are not broken down in terms of quantitative targets and time frames, a key feature of performance goals. Defining goals to identify desired results is the first step in performance assessment. Because of the lack of goals, it is difficult to assess the progress or results of these programs or initiatives. For example, although FNS can state how much money was spent on its TEFAP Reach and Resiliency Grant Initiative, and officials can point to projects that expanded the program's reach, FNS did not set measurable goals that directed their efforts. As a result, the narrative grant progress reports do not allow the agency to easily assess how many rural counties or tribal areas were added to the program because of additional funding, or how many additional households were served as a result.

FNS officials said part of the challenge in setting goals is that states and local agencies have discretion in how they administer the programs. We have highlighted strategies in our prior work that agencies can use when faced with the challenge of having limited control over external factors that can affect a program's outcomes. These strategies include selecting a mix of outcome goals over which the agency has varying levels of control, using data about external factors to statistically adjust for their effect on the desired outcome, and disaggregating goals for distinct target populations for which the agency has different expectations.<sup>69</sup> A fundamental element in an organization's efforts to manage for results is its ability to set performance goals with specific targets and time frames that reflect strategic goals and to measure progress toward them.<sup>70</sup>

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## FNS Does Not Have Performance Measures for TEFAP and CSFP but Has Proposed to Improve Data Collection

FNS reports on the inputs and outputs of these programs, such as pounds and types of food purchased and distributed, administrative funds provided to states, and costs of food. However, those data do not provide information about program outcomes or the agency's level of performance relative to those outcomes. For instance, the agency has provided an overview of program activities, costs, and tables with pounds

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<sup>68</sup>U.S. Department of Agriculture, Food and Nutrition Service, "TEFAP Reach and Resiliency Grant Initiative," accessed May 13, 2024, <https://www.fns.usda.gov/tefap/reach-resiliency-grant>.

<sup>69</sup>GAO-16-393, 23.

<sup>70</sup>GAO-16-393, 24.

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and types of foods purchased—key program inputs for TEFAP and CSFP—in its last four Budget Explanatory Notes to Congress, which explain the agency’s requests for congressional funding.<sup>71</sup> However, the lists of pounds and types of food purchased are not translated into results-oriented information that allows stakeholders to understand what this means for the progress of the programs relative to goals or priorities. For example, it does not help stakeholders know whether more fresh produce was provided or whether efforts to offer kosher and halal foods have resulted in more orders for those types of foods. In addition, the information FNS publicly reports on food purchases and distributions has at times been inconsistent.<sup>72</sup>

We have reported in our prior work that performance measures allow organizations to track progress in achieving their goals by comparing actual performance against planned or expected results, including identifying any gaps.<sup>73</sup> Without defining performance goals and gathering data about how well programs are achieving those goals, FNS may not be making the best use of its resources and is not able to assess and communicate goal progress. Agency officials told us it is difficult to set quantifiable targets for TEFAP and CSFP because they lack sufficient data for TEFAP, and states have discretion in how both programs are implemented. Our prior work has acknowledged the challenges in understanding overall performance in programs that offer flexibility to state and local agencies. However, our prior work has also outlined

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<sup>71</sup>2025 U.S. Department of Agriculture (USDA) Explanatory Notes – Food and Nutrition Service, <https://www.usda.gov/sites/default/files/documents/34-FNS-2025-ExNotes.pdf>. Prior years’ budget justifications can be accessed at U.S. Department of Agriculture, “Congressional Justifications,” <https://www.usda.gov/cj>. Prior to the last 4 years, the information provided in Budget Explanatory Notes regarding TEFAP and CSFP was variable in format. For example, the 2021 FNS Budget Explanatory Notes did not include a complete list of foods and amounts for TEFAP or CSFP. In 2019, a bulleted list of TEFAP foods identified some kosher and halal items available through TEFAP, but in 2020, kosher and halal items were not mentioned.

<sup>72</sup>For example, FNS’s 2024 Budget Explanatory Notes to Congress state that TEFAP purchased 921 million pounds of food in fiscal year 2022, while a July 2024 Annual Summary of FNS Programs for fiscal years 2019 through 2023 states that TEFAP distributed 731 million pounds of food in that same year—a difference of 190 million pounds of food. FNS officials said that they were aware of the discrepancies and are working to align the charts.

<sup>73</sup>[GAO-16-393](#), 8. GAO, *Military and Veteran Support: Performance Goals Could Strengthen Programs that Help Servicemembers Obtain Civilian Employment*, [GAO-20-416](#) (Washington, D.C.: July 9, 2020).

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potential approaches to overcome this challenge, such as developing common national measures.<sup>74</sup>

In the absence of performance measures, FNS has proposed some changes to increase data collection for these programs. For example, although states, food banks, and food pantries are required to collect data about TEFAP participation and the name and location of organizations that distribute TEFAP in each state, FNS does not require states to report that data. FNS issued a proposed rule in August 2023 that would require states to report TEFAP participation to FNS on a quarterly basis and post updated lists of agencies that are eligible to receive TEFAP on a public website annually.<sup>75</sup> Officials stated that if the proposed rule is finalized, an extensive process would be required to get the data collection in place, which FNS plans to carry out with existing program resources.

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## FNS Does Not Conduct Program Evaluations for TEFAP and CSFP

Gaps in knowledge about the effectiveness of TEFAP and CSFP have persisted over time. We reported in 2010 that little was known about the effectiveness of TEFAP and CSFP.<sup>76</sup> Since then, FNS published two reports (in 2011 and 2016) examining the nutrient and food group content of USDA Foods offered and delivered in TEFAP and CSFP, among other programs.<sup>77</sup> The studies found that the foods offered and delivered

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<sup>74</sup>GAO, Program Evaluation: Strategies for Assessing How Information Dissemination Contributes to Agency Goals, [GAO-02-923](#) (Washington, D.C.: Sept. 30, 2002).

<sup>75</sup>Among other aspects of the proposed rule, the agency proposes to add a requirement that state agencies report the total number of people participating in TEFAP through the distribution of USDA Foods for home consumption and that they publicly post and report to FNS on an annual basis a list of local agencies that offer TEFAP in their state. Additionally, they propose requiring states to make a list of all CSFP distribution sites publicly available. 88 Fed. Reg. 54,908 (Aug. 14, 2023).

<sup>76</sup>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).

<sup>77</sup>T. Zimmerman, B. Sun, J. Hu, S. Dixit-Joshi, and E. Eaker, *Nutrient and MyPyramid Analysis of USDA Foods in the NSLP, CACFP, CSFP, TEFAP, and FDPIR* (U.S. Department of Agriculture, Food and Nutrition Service, Aug. 22, 2011); T. P. Zimmerman, B. Sun, and S. Dixit-Joshi, *Nutrient and Food Group Analysis of USDA Foods in Five of Its Food and Nutrition Programs—2014* (U.S. Department of Agriculture, Food and Nutrition Service, February 2016).

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through these programs were generally nutritious; however, these studies did not assess the effectiveness of the programs.<sup>78</sup>

FNS does not conduct program evaluations that assess how well TEFAP and CSFP are working, in part, because it lacks the data to do so, according to officials we interviewed. To begin addressing some of these gaps in knowledge, FNS has proposed to study CSFP and TEFAP by contracting with external research organizations. FNS awarded a nearly \$2 million contract for a study of CSFP participant characteristics, which is currently underway.<sup>79</sup> According to FNS's description, the study will include surveys of local agencies that provide CSFP food to older adults. While this will not directly assess program effectiveness, it will provide some useful information about the program's participants and providers. The agency has also proposed a TEFAP provider study that would include a census survey and follow-up conversations about access, program coverage, and service models. However, according to FNS officials we interviewed, the study has not been funded, and FNS officials said they are not currently moving forward with the study.<sup>80</sup>

Without an effective program performance assessment system that includes clear outcome goals for expected results and well-defined performance measures, efforts to learn from new data collection may be inefficient and unfocused or may provide one-time insight with little contribution to ongoing performance management. Developing program goals and aligning its program assessment efforts could help FNS eliminate unnecessary data collection that is not directly informing goals or compliance in a concrete way. This could also better position FNS to evaluate these programs in the future by making relevant evidence for

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<sup>78</sup>According to the studies, CSFP and TEFAP foods as delivered had higher Healthy Eating Index scores than the typical American intake. The Healthy Eating Index is a measure of diet quality used to assess how well a set of foods aligns with key recommendations and dietary patterns published in the Dietary Guidelines for Americans.

<sup>79</sup>FNS awarded a contract to Westat in August 2023 to conduct the CSFP Participant Characteristics and Program Operations study, expected to last from 2024 through 2026.

<sup>80</sup>According to the 2023 Budget Explanatory Notes for FNS, in fiscal year 2023, FNS requested dedicated funding for the Commodity Assistance Programs account—which includes TEFAP and CSFP—because the account has no dedicated study or evaluation funding. Officials stated that without additional funding from Congress or authorization to use Supplemental Nutrition Assistance Program funds to study TEFAP, they will likely be unable to carry out the TEFAP study.



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such evaluations readily available. Future evaluations could then provide a clearer picture of successes and areas for improvement.

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## Conclusions

The charitable food assistance network plays a key role in the nutrition assistance safety net, particularly in meeting individuals' and households' immediate needs for food. While TEFAP and CSFP are among the smaller programs at FNS, they represent significant sources of food for the charitable food assistance network and households who rely on this assistance. Given that these programs are ultimately implemented by states and thousands of local organizations and supported by volunteers, it is important that FNS—the federal agency ultimately responsible for program oversight—provide clear and easy-to-understand guidance. By improving the guidance for TEFAP and CSFP, FNS has an opportunity to improve its support of states and the charitable food assistance network in delivering these critical programs. Additionally, by streamlining the process for addressing delivery issues and complaints, FNS could make tangible progress in meeting its agency priorities of improved program performance and customer service.

More broadly, FNS can take steps to develop a systematic approach to managing TEFAP and CSFP performance. At present, FNS knows little about how well these programs are performing or the impact they have. By implementing a program performance assessment system, FNS can change how it approaches goal setting and performance measurement in these USDA Foods programs. For example, setting measurable, time-bound performance goals can help FNS create a clear picture of what it is trying to achieve with these programs and how it will achieve it. This would lay the groundwork for FNS to proactively develop useful information that informs stakeholders about the programs' performance.

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## Recommendations for Executive Action

We are making the following five recommendations to USDA:

The Secretary of Agriculture should ensure that the Food and Nutrition Service document and implement a process to provide and routinely update consolidated and user-friendly TEFAP program guidance for states and local agencies on the FNS website. For example, this could be a program handbook or a consolidated list of pertinent program guidance. (Recommendation 1)

The Secretary of Agriculture should ensure that FNS document and implement a process to provide and routinely update consolidated and user-friendly CSFP program guidance for states and local agencies on

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the FNS website. For example, this could be a program handbook or a consolidated list of pertinent program guidance. (Recommendation 2)

The Secretary of Agriculture should ensure that FNS, in coordination with the Agricultural Marketing Service, document and implement a plan with measurable goals and timeframes to streamline the process for resolving USDA Foods delivery issues and complaints. This could include streamlining the escalation process for delivery issues and proactively communicating complaint status updates with recipient agencies. (Recommendation 3)

The Secretary of Agriculture should ensure that FNS develop and implement a program performance assessment system for TEFAP, beginning with setting measurable program performance goals and measures. In developing goals and measures, FNS should consider the types of data and information that could be useful for future evaluations. (Recommendation 4)

The Secretary of Agriculture should ensure that FNS develop and implement a program performance assessment system for CSFP, beginning with setting measurable program performance goals and measures. In developing goals and measures, FNS should consider the types of data and information that could be useful for future evaluations. (Recommendation 5)

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## Agency Comments

We provided a draft of this report to USDA for review and comment. USDA provided comments by email and generally concurred with all five recommendations. With respect to our recommendations to establish performance assessment systems for TEFAP and CSFP, USDA noted that it may need additional funding to collect data to support performance goals and measures for these programs. USDA also provided technical comments, which we incorporated as appropriate.

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

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If you or your staff have any questions about this report, please contact me at (202) 512-7215 or [larink@gao.gov](mailto: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.

A handwritten signature in black ink that reads "Kathryn A. Larin". The signature is written in a cursive style with a large, prominent initial 'K'.

Kathryn A. Larin  
Director, Education, Workforce, and Income Security

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# Appendix I: Objectives, Scope, and Methodology

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This report examines (1) the strengths and limitations of federal indicators of food hardship and the extent to which these indicators have changed over time, (2) the extent to which the U.S. Department of Agriculture (USDA) is overseeing state implementation of The Emergency Food Assistance Program (TEFAP) and the Commodity Supplemental Food Program (CSFP), and (3) the extent to which USDA has assessed the performance and effectiveness of TEFAP and CSFP.

To address all three objectives, we reviewed relevant federal laws and regulations, data, and USDA documents regarding TEFAP and CSFP oversight, goals, and priorities. We interviewed USDA national office officials, including staff from the Food and Nutrition Service (FNS), Economic Research Service, and Agricultural Marketing Service. We also interviewed USDA regional office staff responsible for overseeing TEFAP and CSFP in all seven regions and state officials responsible for administering the programs in three selected states: the District of Columbia metropolitan area, Montana, and New Mexico.<sup>1</sup> We selected six experts based on authorship of relevant scholarly research on food security, charitable food assistance, TEFAP, and CSFP and recommendations from other experts. Finally, we selected two national organizations based on their knowledge about the charitable food assistance network and TEFAP and CSFP, including Feeding America (a nonprofit membership and advocacy organization that represents food banks and food pantries) and the American Commodity Distribution Association (a nonprofit professional association devoted to the improvement of USDA's food distribution system).<sup>2</sup>

We selected the three states to obtain variation in three primary quantitative criteria including TEFAP food cost per capita, CSFP participation per capita, and food insecurity rates. We also selected them to obtain variation based on other secondary criteria including:

- receipt of a TEFAP Reach & Resiliency Grant,
- end date of Supplemental Nutrition Assistance Program Emergency Allotments,

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<sup>1</sup>USDA has FNS regional offices in the following seven regions: Mid-Atlantic, Midwest, Mountain Plains, Northeast, Southeast, Southwest, and Western.

<sup>2</sup>In addition to interviews, we received written comments from state officials through the American Commodity Distribution Association.

- number of identified Feeding America affiliated and non-affiliated food banks and pantries, and
- geographic location (as defined by FNS's seven regions).

We created a ranking of states based on the criteria. We selected New Mexico, Montana, and the District of Columbia, states with low, mid-ranged, and high rankings, respectively.<sup>3</sup> Additionally, we included the District of Columbia metropolitan area because it represented a contrast to New Mexico and Montana and met our overarching goal of providing variety in illustrative examples.<sup>4</sup> We also gathered perspectives from state officials through the American Commodity Distribution Association.<sup>5</sup> Members of this organization include state agencies that distribute USDA Foods (domestically sourced agricultural products purchased by USDA for use in its programs), among other members.

We interviewed officials from 14 selected local agencies (food banks and food pantries) in the three selected states to better understand how the programs operate, how they interact with national organizations like Feeding America, and any challenges they face in administering the programs. To obtain perspectives from the broader charitable food assistance network, we also interviewed a large independent food bank that is not part of the Feeding America network and does not participate in TEFAP and CSFP. We selected food banks and food pantries based on stakeholder recommendations and to obtain variation in factors such as size, TEFAP and CSFP participation, and whether the food bank was affiliated with Feeding America. Observations from our interviews with officials in selected states, food pantries, and food banks provide illustrative examples but are not generalizable to all states, food pantries, or food banks.

To examine the strengths and limitations of federal indicators of food hardship and the extent to which these indicators have changed over

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<sup>3</sup>Lower rankings represented higher TEFAP total cost per capita, higher CSFP participation per capita, and higher food insecurity rates within the state.

<sup>4</sup>Throughout this report, when we refer to states we visited or state officials we spoke with, this includes the District of Columbia unless otherwise noted.

<sup>5</sup>Specifically, we interviewed five state officials who serve on the American Commodity Distribution Association board. We also submitted questions to be discussed during an American Commodity Distribution Association monthly state agency member conference call regarding any challenges state agencies face in administering TEFAP and CSFP. We received responses from four of 44 states. One of these four states overlapped with one of our selected states.

time, we analyzed USDA and U.S. Census Bureau documentation, including relevant data, research, and reports. Specifically, we analyzed recent data from the Current Population Survey Food Security Supplement from 2011 to 2023 and Household Pulse Survey (HPS) data from 2020 to 2023 related to food security, receipt of free groceries or meals, and food insufficiency.<sup>6</sup> We assessed the reliability of these data by reviewing methodological and technical documentation and interviewing Economic Research Service officials. We determined these data were sufficiently reliable for the purposes of providing summary and trend information. Given the nature of this research objective, the findings section of the report provides more detailed information about the strengths and limitations of these various indicators.

To examine the extent to which USDA is overseeing state implementation of TEFAP and CSFP, we analyzed documents and interviewed USDA officials regarding FNS's oversight process, including program monitoring, guidance, technical assistance, and the process for resolving complaints and other issues related to the condition of food delivered through TEFAP and CSFP. In addition, we analyzed complaint data gathered between October 1, 2021, and January 31, 2023, in the Web-Based Supply Chain Management system.<sup>7</sup> We compared FNS's oversight activities against relevant USDA and FNS agency goals and priorities, as well as federal internal control principles related to risk assessment and information and communication.

To examine the extent to which USDA has taken steps to measure performance and assess evidence about the effectiveness of TEFAP and CSFP, we analyzed relevant documents and interviewed USDA officials. We compared this evidence to key elements of a program performance assessment system, which is an important component of effective

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<sup>6</sup>According to the Economic Research Service officials, before 2011, standard errors were calculated differently, so the estimates would not be consistent. The HPS, an experimental data product, is an interagency federal statistical rapid response survey to measure household experiences during the COVID-19 pandemic. The survey is conducted by the U.S. Census Bureau in partnership with multiple other federal agencies. In March 2021, the U.S. Census Bureau published the results of a nonresponse bias analysis for the 2020 HPS that identified evidence of response patterns that could result in biased estimates. The U.S. Census Bureau adjusted sampling weights, which can help but may not completely mitigate nonresponse bias.

<sup>7</sup>The Web-Based Supply Chain Management system is the ordering, procurement, distribution, and tracking system for USDA Foods, which are domestically sourced agricultural products purchased by USDA for use in its programs, including for TEFAP and CSFP. The Web-Based Supply Chain Management system is managed by the Agricultural Marketing Service Commodity Procurement Program.

program management. We previously reported that program assessment is an important way to obtain evaluative information and we identified key elements of program assessment of federal programs.<sup>8</sup> In addition, we reviewed data from fiscal year 2019 to 2023 about the pounds of food purchased and distributed for TEFAP and CSFP before, during, and after the COVID-19 pandemic. We gathered these data from sources including publicly available reports and information provided by USDA. We assessed the reliability of this data by comparing multiple sources of data and by interviewing and reviewing written responses from knowledgeable USDA officials. We determined these data were sufficiently reliable for the purpose of presenting summary information about pounds of food purchased and distributed.

We conducted this performance audit from January 2023 to September 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.

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<sup>8</sup>GAO, *Broadband: USDA Should Set Performance Goals and Improve Fraud Risk Management for Funding Program*, [GAO-23-105265](#) (Washington, D.C.: Oct. 31, 2022); and *Veterans Justice Outreach Program: VA Could Improve Management by Establishing Performance Measures and Fully Assessing Risks*, [GAO-16-393](#) (Washington, D.C.: Apr. 28, 2016).

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# Appendix II: Changes in Federal Food Hardship Indicators over Time

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The U.S. Department of Agriculture (USDA) has taken steps to improve the three key indicators of food hardship and measure food hardship more effectively.

## How Does Food Insecurity Relate to Hunger?

- Food insecurity is a household-level economic and social condition of limited or uncertain access to adequate food.
- Hunger is an individual-level physiological condition that may result from food insecurity.
- The U.S. Department of Agriculture (USDA) does not have an indicator of hunger or the number of hungry people. The food security questionnaire includes questions related to the severity of food insecurity. The indicators of the most severe food insecurity include whether an adult or child in the household did not eat for a whole day because there was not enough money for food.
- According to USDA, measuring hunger would require the collection of more detailed and extensive information about physiological experiences of individual household members than could be accomplished effectively in the context of USDA's annual household food security survey.

Source: GAO analysis of USDA documents. | GAO-24-106539

**Food security.** USDA has worked with the U.S. Census Bureau and other researchers over time to evaluate the food security indicator, which is part of the Current Population Survey Food Security Supplement (CPS-FSS).<sup>1</sup> In 2006, the National Research Council released a report that affirmed the appropriateness of the general method used to measure food security and resulted in USDA making minor revisions to the wording and ordering of survey questions.<sup>2</sup> In addition, USDA changed its food security levels to make a clear and explicit distinction between food security and hunger.<sup>3</sup> The Council recommended that USDA consider several potential technical enhancements to the statistical methods for the food security measure. These enhancements were explored, but the conclusion from the research was that little would be gained by using a more complex food security indicator.<sup>4</sup>

More recently, in 2022, USDA's Economic Research Service worked with the U.S. Census Bureau to review the survey content, make revisions, and conduct cognitive testing of the individual survey questions. Modifications included changing the ordering of sections and modifying two questions about child food security to standardize them. This process of making the modifications included split-panel testing to assess the differences in data collected from the standard and modified instrument.<sup>5</sup> This resulted in a small but statistically significant difference of 1 percentage point in the prevalence of food security. The Economic Research Service analyzed the results of the split-panel test to examine

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<sup>1</sup>The U.S. Census Bureau conducts both the CPS-FSS and the Household Pulse Survey. In addition, USDA has worked with the U.S. Census Bureau to review and revise the CPS-FSS.

<sup>2</sup>National Research Council, *Food Insecurity and Hunger in the United States: An Assessment of the Measure* (Washington, D.C.: The National Academies Press, 2006).

<sup>3</sup>What was once referred to as "food insecurity with hunger" is now described as "very low food security." This change was in name only; no changes were made to the actual measurement of the condition.

<sup>4</sup>U.S. Department of Agriculture, Economic Research Service, *Commemorating 20 Years of U.S. Food Security Measurement* (Washington, D.C.: Oct. 5, 2015).

<sup>5</sup>In the split-panel test, half of respondents received the prior survey questions, and half received the revised questions. The data were analyzed to assess performance of the revised questions.



the difference and conducted further testing. The agency determined that both instruments captured similar levels of food hardship severity and that the changes made to the food security section were unlikely to affect the measurement or comparability of estimates from year to year.<sup>6</sup>

**Food sufficiency.** While food sufficiency has been included in various federal surveys for many years, USDA included it as part of the U.S. Census Bureau’s Household Pulse Survey (HPS), which began in 2020, to rapidly assess the nation’s well-being during COVID-19 through a single survey question. The HPS was designed to: assess rapid changes over time; keep the survey burden as low as possible; and be administered as an internet survey with weekly or biweekly data collections. Food sufficiency has been used previously in other federal surveys such as the Continuing Survey of Food Intake of Individuals and the National Health and Nutrition Examination Survey, but these are not comparable to the HPS data because they cover different populations and survey methods.

**Use of community food.** In response to feedback from various stakeholders that data from the CPS-FSS seemed to be underestimating the use of community nutrition assistance, USDA worked with Feeding America and the U.S. Census Bureau to revise the questions in the 2022 survey for this indicator. This work included conducting cognitive testing to ensure survey respondents understood and accurately interpreted the revised questions and split-panel testing to assess differences between new and old survey instruments. Revised survey questions refer to the receipt of “free groceries” and “free meals” instead of “emergency food” and “meals at a soup kitchen or shelter.” This is because cognitive testing participants saw free groceries or meals as routine things they did to supplement their households’ food, whereas they viewed emergency food and soup kitchens as more dire situations they felt did not apply to them. As a result, estimates for the use of community food for 2022 were generally higher than recent preceding years and are not comparable to those estimates due to the changes in the wording of the questions.

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<sup>6</sup>U.S. Department of Agriculture, Economic Research Service, *Analysis of the Current Population Survey Food Security Supplement Split-Panel Test* (Washington, D.C.: September 2023).

# Appendix III: Different Processes to Address Out-of-Condition USDA Foods

The U.S. Department of Agriculture’s Food and Nutrition Service and Agricultural Marketing Service have different processes to manage delivery issues and complaints.

**Table 2: Different U.S. Department of Agriculture (USDA) Processes to Address Out-of-Condition Food**

Delivery issues: The out-of-condition food is discovered before unloading the delivery truck.	Complaints: The out-of-condition food is discovered after unloading the delivery truck.
<ul style="list-style-type: none"> <li>All delivery issues are escalated from the Food and Nutrition Service (FNS) to the Agricultural Marketing Service (AMS).<sup>a</sup></li> <li>AMS aims to resolve delivery issues “on the spot” but previously did not have a time frame goal for resolving delivery issues. In April 2024, however, AMS and FNS revised FNS Instruction 709-5 to (1) establish a 2-hour time limit for AMS to resolve a delivery issue that starts once AMS has received sufficient documentation from the food bank, and (2) allow food banks to refuse the shipment if AMS does not resolve the issue within 2 hours.<sup>c</sup></li> </ul>	<ul style="list-style-type: none"> <li>FNS decides which complaints to escalate to AMS. Complaints FNS does not escalate to AMS are closed.<sup>b</sup></li> <li>AMS aims to resolve complaints within 18 business days.<sup>d</sup></li> </ul>
<ul style="list-style-type: none"> <li>Neither AMS nor FNS has a standard operating procedure for how to address delivery issues.</li> </ul>	<ul style="list-style-type: none"> <li>AMS has a standard operating procedure for how to address complaints.<sup>e</sup></li> <li>FNS does not have a standard operating procedure for how to address complaints.</li> </ul>
<ul style="list-style-type: none"> <li>FNS Instruction 709-5 provides guidance for state agencies on how to address delivery issues. The Instruction previously did not list the information required to report a delivery issue. However, in April 2024, AMS and FNS updated the Instruction to include this information.</li> </ul>	<ul style="list-style-type: none"> <li>The FNS webpage, “How to File a USDA Foods Complaint,” provides guidance for states and local agencies on how to address complaints, including the information required to report a complaint.</li> </ul>
<ul style="list-style-type: none"> <li>State agencies are not required to enter delivery issues into the Web-Based Supply Chain Management system.<sup>f</sup></li> </ul>	<ul style="list-style-type: none"> <li>State agencies are required to enter complaints into the Web-Based Supply Chain Management system.<sup>g</sup></li> </ul>

Source: GAO analysis of FNS Instruction 709-5, AMS Customer Feedback Review Process Standard Operating Procedures, the FNS website, and information provided by officials from the FNS national office and AMS. | GAO-24-106539

Note: Out-of-condition food is no longer fit for human consumption as a result of spoilage, contamination, infestation, adulteration, or damage, according to FNS regulation. 7 C.F.R. § 250.2. Out-of-condition food issues can be related to food safety, product condition, packaging, truck security seals, load shifts, and product temperature, according to FNS officials.

<sup>a</sup>FNS Instruction 709-5 outlines separate processes to address out-of-condition food depending on whether the shipment originated from a USDA-approved vendor or from a federally contracted storage facility. If the shipment originates with a vendor, FNS will work with the AMS commodity procurement staff to determine a resolution. For the purposes of this table, we are focusing on food shipments that originate from a vendor. See FNS Instruction 709-5 for details about how an out-of-condition food shipment is handled when it originates from a federally contracted storage facility, known as a National Multi-Food Warehouse.

<sup>b</sup>FNS officials said they send complaints to AMS when a product or the product’s package, label, or markings do not meet commodity specification requirements. AMS officials said they receive complaints that are egregious or involve a food safety issue. FNS officials said if a complaint is not sent to AMS, it is closed and the status is updated in the Web-Based Supply Chain Management system, but FNS does not proactively notify the state agency or food bank that the complaint was closed. The Web-Based Supply Chain Management system is the ordering and procurement system used for the purchase of USDA Foods, including for the Emergency Food Assistance Program (TEFAP) and the Commodity Supplemental Food Program (CSFP). Some complaints, such as incidental damage due to handling that occurs at the food bank, can be resolved at the state level, according to FNS officials.

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**Appendix III: Different Processes to Address  
Out-of-Condition USDA Foods**

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<sup>c</sup>Per FNS Instruction 709-5, the 2-hour time limit applies to shipments originating from the vendor and not for shipments originating from a federally contracted storage facility. In addition, food banks are allowed to refuse a shipment from a vendor without AMS approval if (1) a delivery truck arrives with a broken or missing security seal, or (2) the serial number on the security seal does not match delivery documentation. However, the food bank must still notify AMS of these security seal issues.

<sup>d</sup>AMS attempts to resolve complaints in which the vendor did not meet contract requirements within 18 business days, which includes 3 business days to determine if contract resolution is needed and 15 business days to attempt to resolve the issue. AMS officials said that out-of-condition food is always a contractual conformance issue.

<sup>e</sup>AMS manages complaints according to the process outlined in the AMS Customer Feedback Review Process Standard Operating Procedure, which is not publicly available.

<sup>f</sup>FNS officials said they encourage states to enter delivery issues into the Web-Based Supply Chain Management system, but AMS officials said the system does not capture all delivery issues.

<sup>g</sup>AMS officials said they do not conduct overall trend analysis of complaint data in the Web-Based Supply Chain Management system.

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# Appendix IV: GAO Contact and Staff Acknowledgments

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## GAO Contact

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## Staff Acknowledgments

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