

Measuring County Food Stamp Performance 2008

The Program Access Index

Tia Shimada

February 2010



California Food Policy Advocates

California Food Policy Advocates (CFPA) is a statewide public policy and advocacy organization dedicated to improving the health and well being of low-income Californians by increasing their access to nutritious, affordable food.

For more information about CFPA, please visit www.cfpa.net.

For more information about this report, please contact Tia Shimada at tia@cfpa.net or 510.433.1122 ext. 109.

Table of Contents

The Program Access Index (PAI)	1
Comparing the PAI and Participation Rates	2
Using the PAI	2
PAI Tables	3
Methodology	7
Appendix A	15
Appendix B	27
References	28

Program Access Index

The Program Access Index (PAI) estimates Food Stamp Program (FSP)¹ utilization among low-income individuals. The United States Department of Agriculture (USDA) produces an annual state-level PAI.^a The PAI provided in this report is a county-level analysis modeled on the USDA methodology. As shown in the general formula below, the county-level PAI estimates FSP utilization among individuals who meet three FSP eligibility criteria: income below 125 percent of the Federal Poverty Guidelines (FPG)², no participation in FDPIR³, and no receipt of SSI⁴.

$$\text{PAI} = \frac{(\text{FSP Participants}) - (\text{Emergency Food Stamp Recipients})}{(\text{Individuals with Income} < 125\% \text{ FPG}) - (\text{FDPIR Participants}) - (\text{SSI Recipients})}$$

The PAI incorporates only three FSP eligibility criteria. Therefore, it is not a participation rate that measure FSP participation among fully-eligible individuals. However, the PAI can help illuminate county-level differences in FSP administration and utilization.

USDA uses its state-level PAI as one measure to “reward States for high performance in the administration of the Supplemental Nutrition Assistance Program (SNAP).”^b Because FSP policies and practices vary by county, the county-level PAI can be used as one indicator of local FSP performance. The PAI can also be used to draw comparisons of FSP performance between counties and between counties and the state.

Comparing the PAI and Participation Rates

Each year, USDA releases food stamp program “participation rates” for all 50 states and the District of Columbia. These participation rates are complex estimates of food stamp participation among eligible individuals. The rates take into account several criteria for

¹ The nutrition assistance program known federally as “SNAP” (Supplemental Nutrition Assistance Program) is known as the “Food Stamp Program” (FSP) in California.

² Eligibility criteria for the Food Stamp Program allow participants to have incomes below 130 percent of FPG. However, annual county-level estimates are not available for the number of individuals with incomes below 130 percent of FPG. Therefore, having an income below 125 percent of FPG is used as a proxy for FSP income eligibility. The use of this proxy may underestimate the number of individuals who are income-eligible for FSP.

³ FDPIR = Food Distribution Program on Indian Reservations. FDPIR participants are not eligible for FSP benefits.

⁴ SSI = Supplemental Security Income. In California, SSI recipients are not eligible for FSP benefits.

food stamp eligibility, including income, household resources, receipt of SSI, and citizenship/immigration status.⁵ In comparison, the PAI takes into account three FSP criteria: income, FDPIR participation, and SSI status.

State participation rates for any given year are typically released two years following. For example, USDA's state participation rates for 2007 were released in 2009. In contrast, the PAI can be calculated within one year. For example, USDA released the 2008 state PAI in 2009.

Using the PAI

USDA state participation rates may be the best available estimates of food stamp participation among fully-eligible individuals. However, the rates are calculated as statewide measures and have limited relevance at the county level. USDA does not calculate county-level participation rates. As FSP policies and practices vary across California counties, a county-level indicator of utilization and administrative performance is necessary. The PAI is one such indicator.

PAI Tables

This section contains four tables, described briefly below, that collectively detail the PAI for all 58 California counties.

- Table 1 shows the PAI for California's 40 largest counties based on a methodology that uses income data from the American Community Survey (ACS).
- Income data for California's 18 smallest counties are not available from ACS. Therefore, Table 2 shows the PAI for all California counties based on an alternate methodology that allows the inclusion of the 18 smallest counties. The alternate methodology uses income data from the Small Area Income and Poverty Estimates and the 2000 US Census.
- Table 3 shows the most accurate PAI available for each California county, listed alphabetically. That is, Table 3 combines the PAI for the 40 largest counties from Table 1 and the PAI for the 18 smallest counties from Table 2.
- Table 4 shows the most accurate PAI available for each California county, listed by rank. That is, Table 4 combines the PAI for the 40 largest counties from Table 1 and the PAI for the 18 smallest counties from Table 2.

⁵ The USDA state participation rates do not take into account FDPIR participation or categorical eligibility. Please see the USDA report *Reaching Those in Need: State Supplemental Nutrition Assistance Participation Rates in 2007* available at: <http://www.fns.usda.gov/ora/menu/Published/SNAP/FILES/Participation/Reaching2007Summary.pdf>.

The PAI tables in this section were generated with methodologies that subtract all Supplemental Security Income (SSI) participants from the population of individuals who are income-eligible for FSP. An adjunct set of PAI tables was generated with methodologies that subtract the estimated SSI population with income below 125 percent of FPG from the population of individuals who are income-eligible for FSP. This adjunct set of tables can be found in Appendix A. For full details about the treatment of SSI data within the PAI analysis, please see Step 7 of the methodologies.

Large Counties

Table 1 shows the PAI and rank for each of California's 40 largest counties, listed alphabetically. When applied to statewide data, the methodology used to generate Table 1 yields a PAI of 0.440 for California.

Table 1

County	PAI	Rank
Alameda	0.509	15
Butte	0.401	23
Contra Costa	0.365	28
El Dorado	0.392	25
Fresno	0.625	6
Humboldt ¹	0.404	21
Imperial	0.582	8
Kern	0.516	13
Kings	0.724	3
Lake	0.464	19
Los Angeles ¹	0.404	22
Madera ²	0.557	11
Marin	0.313	33
Mendocino	0.508	16
Merced	0.573	9
Monterey	0.335	32
Napa	0.202	39
Nevada	0.347	31
Orange	0.281	37
Placer	0.360	29

County	PAI	Rank
Riverside	0.379	26
Sacramento	0.745	2
San Bernardino ²	0.557	10
San Diego	0.265	38
San Francisco	0.395	24
San Joaquin	0.510	14
San Luis Obispo	0.293	36
San Mateo	0.192	40
Santa Barbara	0.356	30
Santa Clara	0.517	12
Santa Cruz	0.366	27
Shasta	0.480	17
Solano	0.717	4
Sonoma	0.295	35
Stanislaus	0.618	7
Sutter	0.433	20
Tulare	0.708	5
Ventura	0.476	18
Yolo	0.312	34
Yuba	0.913	1

¹⁻²The County PAI is listed here with three significant digits (the three digits to the right of the decimal point). However, the PAI used to calculate the county ranking contained 15 significant digits. Viewed with four significant digits, Humboldt County's PAI is 0.4045 and Los Angeles County's PAI is 0.4044. Thus, their respective ranks are 21 and 22. Similarly, San Bernardino County's PAI is 0.5568 and Madera County's PAI is 0.5567.

All Counties – Alternate Methodology

Table 2 shows the PAI for all California counties calculated with income data from the Small Area Income and Poverty Estimates and the 2000 Census rather than the American Community Survey (ACS). This alternate methodology is necessary because income data from ACS, which are used to calculate the PAI for California's 40 largest counties, are not available for the 18 smallest counties (denoted by *). When applied to statewide data, the methodology used to generate Table 2 yields a PAI of 0.446 for California.

Table 2

County	PAI	Rank
Alameda	0.536	18
Alpine*	0.533	19
Amador*	0.417	35
Butte	0.424	31
Calaveras*	0.401	36
Colusa*	0.425	30
Contra Costa	0.360	41
Del Norte*	0.682	4
El Dorado	0.326	47
Fresno	0.656	6
Glenn*	0.455	29
Humboldt	0.422	32
Imperial	0.619	8
Inyo*	0.507	22
Kern	0.517	21
Kings	0.576	12
Lake	0.497	24
Lassen*	0.382	38
Los Angeles	0.420	33
Madera	0.554	16
Marin	0.262	54
Mariposa*	0.331	46
Mendocino	0.561	14
Merced	0.588	9
Modoc*	0.524	20
Mono*	0.184	58
Monterey	0.365	40
Napa	0.235	56
Nevada	0.323	48

County	PAI	Rank
Orange	0.268	53
Placer ¹	0.348	44
Plumas*	0.319	49
Riverside	0.391	37
Sacramento	0.747	2
San Benito*	0.546	17
San Bernardino	0.556	15
San Diego	0.260	55
San Francisco	0.419	34
San Joaquin	0.568	13
San Luis Obispo	0.270	52
San Mateo	0.195	57
Santa Barbara	0.351	43
Santa Clara	0.505	23
Santa Cruz ¹	0.348	45
Shasta	0.475	27
Sierra*	0.295	50
Siskiyou*	0.578	10
Solano	0.663	5
Sonoma	0.278	51
Stanislaus	0.636	7
Sutter	0.482	26
Tehama*	0.577	11
Trinity*	0.371	39
Tulare	0.690	3
Tuolumne*	0.486	25
Ventura	0.457	28
Yolo	0.357	42
Yuba	0.757	1

¹The County PAI is listed here with three significant digits (the three digits to the right of the decimal point). However, the PAI used to calculate the county ranking contained 15 significant digits. Viewed with four significant digits, Placers County's PAI is 0.3480 and Santa Cruz County's PAI is 0.3476. Thus, their respective ranks are 44 and 45.

Merged PAI – All Counties Alphabetically

The most accurate PAI for California's 40 largest counties is presented in Table 1. The most accurate PAI for California's 18 smallest counties (denoted by *) is presented in Table 2. Table 3 merges Tables 1 and 2 to show the most accurate PAI available for each county, listed alphabetically.

Table 3

County	PAI	Rank
Alameda	0.509	21
Alpine*	0.533	16
Amador*	0.417	31
Butte ¹	0.401	35
Calaveras* ¹	0.401	34
Colusa	0.425	30
Contra Costa	0.365	42
Del Norte*	0.682	6
El Dorado	0.392	37
Fresno	0.625	7
Glenn*	0.455	28
Humboldt ²	0.404	32
Imperial	0.582	9
Inyo*	0.507	23
Kern	0.516	19
Kings	0.724	3
Lake	0.464	27
Lassen*	0.382	38
Los Angeles ²	0.404	33
Madera ³	0.557	14
Marin	0.313	49
Mariposa*	0.331	47
Mendocino	0.508	22
Merced	0.573	12
Modoc*	0.524	17
Mono*	0.184	58
Monterey	0.335	46
Napa	0.202	56
Nevada	0.347	45

County	PAI	Rank
Orange	0.281	54
Placer	0.360	43
Plumas*	0.319	48
Riverside	0.379	39
Sacramento	0.745	2
San Benito*	0.546	15
San Bernardino ³	0.557	13
San Diego	0.265	55
San Francisco	0.395	36
San Joaquin	0.510	20
San Luis Obispo	0.293	53
San Mateo	0.192	57
Santa Barbara	0.356	44
Santa Clara	0.517	18
Santa Cruz	0.366	41
Shasta	0.480	25
Sierra* ⁴	0.295	51
Siskiyou*	0.578	10
Solano	0.717	4
Sonoma ⁴	0.295	52
Stanislaus	0.618	8
Sutter	0.433	29
Tehama*	0.577	11
Trinity*	0.371	40
Tulare	0.708	5
Tuolumne*	0.486	24
Ventura	0.476	26
Yolo	0.312	50
Yuba	0.913	1

¹⁻⁴The County PAI is listed here to three significant digits (the three digits to the right of the decimal point). However, the PAI used to calculate the county ranking contained 15 significant digits. Viewed with four significant digits, Calaveras County's PAI is 0.4014 and Butte County's PAI is 0.4008. Thus, their respective ranks are 34 and 35. Similarly, Humboldt County's PAI is 0.4045 and Los Angeles County's PAI is 0.4044. San Bernardino County's PAI is 0.5568 and Madera County's PAI is 0.5567. Sierra County's PAI is 0.2955 and Sonoma County's PAI is 0.2945

Merged PAI – All Counties by Rank

The most accurate PAI for California's 40 largest counties is presented in Table 1. The most accurate PAI for California's 18 smallest counties (denoted by *) is presented in Table 2. Table 4 merges Tables 1 and 2 to show the most accurate PAI available for each county, listed by rank.

Table 4

County	PAI	Rank
Yuba	0.913	1
Sacramento	0.745	2
Kings	0.724	3
Solano	0.717	4
Tulare	0.708	5
Del Norte*	0.682	6
Fresno	0.625	7
Stanislaus	0.618	8
Imperial	0.582	9
Siskiyou*	0.578	10
Tehama*	0.577	11
Merced	0.573	12
San Bernardino ¹	0.557	13
Madera ¹	0.557	14
San Benito*	0.546	15
Alpine*	0.533	16
Modoc*	0.524	17
Santa Clara	0.517	18
Kern	0.516	19
San Joaquin	0.510	20
Alameda	0.509	21
Mendocino	0.508	22
Inyo	0.507	23
Tuolumne*	0.486	24
Shasta	0.480	25
Ventura	0.476	26
Lake	0.464	27
Glenn *	0.455	28
Sutter	0.433	29

County	PAI	Rank
Colusa*	0.425	30
Amador*	0.417	31
Humboldt ²	0.404	32
Los Angeles ²	0.404	33
Calaveras* ³	0.401	34
Butte ³	0.401	35
San Francisco	0.395	36
El Dorado	0.392	37
Lassen*	0.382	38
Riverside	0.379	39
Trinity*	0.371	40
Santa Cruz	0.366	41
Contra Costa	0.365	42
Placer	0.360	43
Santa Barbara	0.356	44
Nevada	0.347	45
Monterey	0.335	46
Mariposa*	0.331	47
Plumas*	0.319	48
Marin	0.313	49
Yolo	0.312	50
Sierra* ⁴	0.295	51
Sonoma ⁴	0.295	52
San Luis Obispo	0.293	53
Orange	0.281	54
San Diego	0.265	55
Napa	0.202	56
San Mateo	0.192	57
Mono*	0.184	58

¹⁻⁴The County PAI is listed here to three significant digits (the three digits to the right of the decimal point). However, the PAI used to calculate the county ranking contained 15 significant digits. Viewed with four significant digits, Calaveras County's PAI is 0.4014 and Butte County's PAI is 0.4008. Thus, their respective ranks are 34 and 35. Similarly, Humboldt County's PAI is 0.4045 and Los Angeles County's PAI is 0.4044. San Bernardino County's PAI is 0.5568 and Madera County's PAI is 0.5567. Sierra County's PAI is 0.2955 and Sonoma County's PAI is 0.2945.

Methodology

Methodology for Table 1 and Large Counties in Tables 3-4

This methodology details the calculations used for the PAI of California's 40 largest counties as shown in Table 1. PAI for California's 40 largest counties in Tables 3-4 were also calculated using this methodology.

Except in the treatment of SSI participation data, this methodology follows the USDA methodology⁶ used to calculate the 2008 state-level PAI. As detailed in Step 7 below, this methodology subtracts the total number of SSI participants from the population of individuals who are income-eligible for FSP.

An adjunct PAI calculation, which subtracts the estimated SSI population with income below 125 percent of FPG from the population of individuals who are income-eligible for FSP, is located in Appendix A.

Step 1: Determine the annual count of Food Stamp Program participants for the 2008 calendar year by summing monthly participation counts from January 2008 through December 2008.

Sum of Monthly Participation from January through December = Annual Count of Food Stamp Program Participants

Data Source: Food Stamp Program participation data for the state of California and all California counties are available at: <http://www.dss.cahwnet.gov/research/PG352.htm>.

Step 2: Determine the average monthly participation for the Food Distribution Program on Indian Reservations (FDPIR) during the 2008 calendar year.

Data Source: Average monthly FDPIR participation data were obtained from the USDA Food and Nutrition Service Western Regional Office. These data are available in Appendix B.

Data were not available to identify the county of residence for each FDPIR participant. Therefore, FDPIR program directors estimated the number of participants residing in

⁶ The USDA methodology is available at: <http://www.fns.usda.gov/ora/MENU/Published/snap/FILES/Other/pai2008.pdf>.

each county. Although this method is not exact, the number of FDPIR participants is so low compared to the number of individuals with incomes below 125 percent of the federal poverty guidelines that any error in the directors' estimates should have a negligible effect on PAI calculations. To quantify the statewide difference between the two populations, there were 6,809 FDPIR participants and 6,338,846 individuals with incomes below 125 percent of the federal poverty guidelines throughout California in 2008.

Step 3: Determine the number of individuals who received emergency food stamp benefits (disaster assistance) during the 2008 calendar year.

Data Source: Disaster assistance participation data were provided by the California Department of Social Services.

Note: There were no emergency food stamp benefits distributed in any California counties for the 2008 calendar year.

Step 4: Calculate the adjusted number of annual Food Stamp Program participants by subtracting Step 3 from Step 1.

Annual Count of Food Stamp Program Participants – Number of Emergency Food Stamp Recipients = Adjusted Annual Count of Food Stamp Program Participants

Step 5: Calculate the adjusted number of average monthly Food Stamp Program participants for the 2008 calendar year by dividing Step 4 by 12.

Adjusted Annual County of Food Stamp Program Participants ÷ 12 months = Adjusted Number of Average Monthly Food Stamp Program Participants

Step 6: Determine number of individuals with incomes below 125 percent of the federal poverty guidelines (FPG) for the 2008 calendar year. Eligibility criteria for the Food Stamp Program allow participants to have incomes below 130 percent of FPG. However, annual county estimates are not available for the number of individuals with incomes below 130 percent of FPG. Therefore, having an income below 125 percent of FPG is used as a proxy for Food Stamp Program income eligibility. The use of this proxy may underestimate the number of individuals who are income-eligible for FSP.

Data Source: County-specific estimates of the number of individuals with incomes below 125 percent of FPG are available from the 2008 American Community Survey at: http://factfinder.census.gov/servlet/DatasetMainPageServlet?_program=ACS&_submenuld=datasets_2&_lang=en&_ts=

(2008 American Community Survey 1-year Estimates, Table B170002)

Step 7: Determine the number of Supplemental Security Income (SSI) participants for the 2008 calendar year. In California, SSI recipients are not eligible to participate in the Food Stamp Program. Therefore, any SSI recipients with incomes below 125 percent of FPG should be removed from the total number of individuals that are income-eligible for the Food Stamp Program. Unfortunately, there are no county-specific data that specify the number of SSI recipients whose incomes fall below 125 percent of FPG.

USDA estimated that 299,007 SSI recipients had incomes below 125 percent of FPG in California during 2008. The total number of SSI recipients in California was 1,270,223 for 2008. This implies that 23.539% of SSI recipients had incomes below 125 percent of FPG for in California during 2008. ($299,007 \text{ SSI recipients with incomes below 125\% FPG} \div 1,270,223 \text{ SSI recipients} = 23.539\%$). USDA uses this percentage to adjust the income-eligible food stamp population for the number of SSI recipients with incomes below 125 percent of FPG.

Based on prior analyses of the California SSI population by Mathematica and other researchers^c, CFPA believes that USDA underestimates the number of SSI recipients with incomes below 125 percent of FPG. In addition, the proportion of low-income SSI recipients may vary across California's counties. Therefore, for this analysis, all SSI recipients are subtracted from the population of individuals with incomes below 125 percent of FPG. This results in an underestimation of the population that is income-eligible for food stamps and, therefore, artificially raises the PAI. An adjunct set of PAI calculations, which incorporate the USDA's SSI adjustment applied uniformly across all counties, is included in Appendix A.

Data Source:

- The USDA's estimate of California's SSI recipients with incomes below 125 percent of FPG is published in *Calculating the SNAP Program Access Index: A Step-by-Step Guide* by the USDA Food and Nutrition Service, available at: <http://www.fns.usda.gov/ora/MENU/Published/snap/FILES/Other/pai2008.pdf>.
- California SSI data are available at: http://www.ssa.gov/policy/docs/statcomps/ssi_sc/index.html.

Step 8: Calculate the adjusted number of individuals with incomes below 125 percent of FPG by subtracting Steps 2 and 7 from Step 6.

Individuals with Incomes Below 125% FPG - Average Monthly FDPIR Participation - SSI Participants = Adjusted Number Of Individuals With Incomes Below 125% FPG

Step 9: Calculate the Program Access Index for 2008 by dividing Step 5 by Step 8.

Adjusted Number of Average Monthly Food Stamp Participants for 2008 ÷ Adjusted Number of Individuals with Incomes Below 125% FPG = County PAI

Step 10: Rank order counties by PAI. The number one ranked county has the highest PAI. That is, the number one ranked county has the highest Food Stamp Program utilization relative to the total number of income-eligible individuals.

Methodology for Table 2 and Small Counties in Tables 3-4

This methodology details the calculations used for the PAI of all California counties that is shown in Table 2. In Tables 3 and 4, this methodology was used only for California's 18 smallest counties.

As detailed in Step 6 below, this methodology uses income data from the Small Area Income and Poverty Estimates and the 2000 Census rather than the American Community Survey (ACS). This is necessary because income data from the ACS, used to calculate PAI for California's large counties, are not available for California's 18 smallest counties.

Shown in Step 7 below, this methodology subtracts the total number of SSI participants from the population of individuals who are income-eligible for FSP. An adjunct PAI calculation, which subtracts the estimated SSI population with income below 125 percent of FPG from the population of individuals who are income-eligible for FSP, can be found in Appendix A.

Step 1: Determine the annual count of Food Stamp Program participants for the 2008 calendar year by summing monthly participation counts from January 2008 through December 2008.

Sum of Monthly Participation from January through December = Annual Count of Food Stamp Program Participants

Data Source: Food Stamp Program participation data for the state of California and all California counties are available at: <http://www.dss.cahwnet.gov/research/PG352.htm>.

Step 2: Determine the average monthly participation for the Food Distribution Program on Indian Reservations (FDPIR) during the 2008 calendar year.

Data Source: Average monthly FDPIR participation data were obtained from the USDA Food and Nutrition Service Western Regional Office. These data are available in Appendix B.

Data were not available to identify the county of residence for each FDPIR participant. Therefore, FDPIR program directors estimated the number of participants residing in each county. Although this method is not exact, the number of FDPIR participants is so low compared to the number of individuals with incomes below 125 percent of the federal poverty guidelines that any error in the directors' estimates should have a negligible effect on PAI calculations. To quantify the statewide difference between the two populations, there were 6,809 FDPIR participants and 6,338,846 individuals with incomes below 125 percent of the federal poverty guidelines throughout California in 2008.

Step 3: Determine the number of individuals who received emergency food stamp benefits (disaster assistance) during the 2008 calendar year.

Data Source: Disaster assistance participation data were provided by the California Department of Social Services.

Note: There were no emergency food stamp benefits distributed in any California counties for the 2008 calendar year.

Step 4: Calculate the adjusted number of annual Food Stamp Program participants by subtracting Step 3 from Step 1.

Annual Count of Food Stamp Program Participants – Number of Emergency Food Stamp Recipients = Adjusted Annual Count of Food Stamp Program Participants

Step 5: Calculate the adjusted number of average monthly Food Stamp participants for the 2008 calendar year by dividing Step 4 by 12.

Adjusted Annual County of Food Stamp Program Participants ÷ 12 months = Adjusted Number of Average Monthly Food Stamp Program Participants

Step 6: Determine number of individuals with incomes below 125 percent of the federal poverty guidelines (FPG). Eligibility criteria for the Food Stamp Program allow participants to have incomes below 130 percent of FPG. However, annual county estimates are not available for the number of individuals with incomes below 130 percent of FPG. Therefore, having an income below 125 percent of FPG is used as a proxy for Food Stamp Program income eligibility.

To estimate the number of individuals with incomes below 125 percent of FPG in all of California's counties (including the 18 smallest) requires data from the 2008 Small Area Income and Poverty Estimates (SAIPE) and the 2000 National Census. SAIPE provides an estimate of the number of individuals in each county with incomes below 100 percent of FPG. The ratio of individuals with incomes below 125 percent of FPG to those with incomes below 100 percent of FPG was determined for each county using 2000 Census data.⁷ This ratio was multiplied by the number of people having incomes below 100 percent of FPG (as reported in SAIPE). Although this method is not exact, it gives the most accurate and most up-to-date estimate of the population living below 125 percent of FPG in the small counties that are not included in the ACS.

Individuals with Incomes Below 125% FPG ÷ Individuals with Incomes Below 100% FPG = Income Ratio from 2000 Census Data

Income Ratio x SAIPE Estimate of Individuals with Incomes Below 100 Percent of FPG = Estimate of Individuals with Incomes Below 125 Percent of FPG

Data Sources:

- 2008 Small Area income and Poverty Estimates (SAIPE) data available at: <http://www.census.gov/did/www/saipe/data/index.html>
- 2000 Census data available at: http://factfinder.census.gov/servlet/DatasetMainPageServlet?_program=DEC&_submenuId=&_lang=en&_ts
(Census 2000 Summary File 3 , Table P88)

⁷ 2000 is the latest year for which data are available quantifying the population with income below 125 percent of FPG in California's smallest 18 counties.

Step 7: Determine the number of Supplemental Security Income (SSI) participants for the 2008 calendar year. In California, SSI recipients are not eligible to participate in the Food Stamp Program. Therefore, any SSI recipients with incomes below 125 percent of FPG should be removed from the total number of individuals that are income-eligible for the Food Stamp Program. Unfortunately, there are no county-specific data that specify the number of SSI recipients whose incomes fall below 125 percent of FPG.

USDA estimated that 299,007 SSI recipients had incomes below 125 percent of FPG in California during 2008. The total number of SSI recipients in California was 1,270,223 for 2008. This implies that 23.539% of SSI recipients had incomes below 125 percent of FPG for in California during 2008. ($299,007 \text{ SSI recipients with incomes below } 125\% \text{ FPG} \div 1,270,223 \text{ SSI recipients} = 23.539\%$). USDA uses this percentage to adjust the income-eligible food stamp population for the number of SSI recipients with incomes below 125 percent of FPG.

Based on prior analyses of the California SSI population by Mathematica and other researchers^d, CFPA believes that USDA underestimates the number of SSI recipients with incomes below 125 percent of FPG. In addition, the proportion of low-income SSI recipients may vary across California's counties. Therefore, for this analysis, all SSI recipients are subtracted from the population of individuals with incomes below 125 percent of FPG. This results in an underestimation of the population that is income-eligible for food stamps and, therefore, artificially raises the PAI. An adjunct set of PAI calculations, which incorporate the USDA's SSI adjustment applied uniformly across all counties, is included in Appendix A.

Data Sources:

- The USDA's estimate of California's SSI recipients with incomes below 125 percent of FPG is published in *Calculating the SNAP Program Access Index: A Step-by-Step Guide* by the USDA Food and Nutrition Service, available at: <http://www.fns.usda.gov/ora/MENU/Published/snap/FILES/Other/pai2008.pdf>.
- California SSI data are available at: http://www.ssa.gov/policy/docs/statcomps/ssi_sc/index.html.

Step 8: Calculate adjusted number of individuals with incomes below 125 percent of FPG by subtracting Steps 2 and 7 from Step 6.

Individuals with Incomes Below 125% FPG - Average Monthly FDPIR Participation – SSI Participants = Adjusted Number of Individuals with Incomes Below 125% FPG

Step 9: Calculate the Program Access Index for 2008 by dividing Step 5 by Step 8.

Adjusted Number of Average Monthly Food Stamp Program Participants ÷ Adjusted Number of Individuals with Incomes Below 125% FPG = County PAI

Step 10: Rank order counties by PAI. The number one ranked county has the highest PAI. That is, the number one ranked county has the highest Food Stamp Program utilization relative to the total number of income-eligible individuals.

Appendix A

SSI-Adjusted PAI

To generate the PAI tables in this Appendix, the SSI population with income below 125 percent of FPG was estimated and removed from the population of individuals who are income-eligible for FSP. These tables are distinct from those in the main body of the report, for which the total number of SSI participants was removed from the population of individuals who are income-eligible for FSP.

There are four tables included in this Appendix.

- Table 5 shows the SSI-adjusted PAI for California's 40 largest counties based on a methodology that uses income data from the American Community Survey (ACS).
- Income data for California's 18 smallest counties are not available from ACS. Therefore, Table 6 shows the SSI-adjusted PAI for all California counties based on an alternate methodology that allows the inclusion of the 18 smallest counties. The alternate methodology uses income data from the Small Area Income and Poverty Estimates and the 2000 US Census.
- Table 7 contains the most accurate SSI-adjusted PAI available for each California county, listed alphabetically. That is, Table 7 combines the PAI for the 40 largest counties in Table 5 with the PAI for the 18 smallest counties in Table 6.
- Table 8 contains the most accurate SSI-adjusted PAI available for each California county, listed by rank. That is, Table 8 combines the PAI for the 40 largest counties in Table 5 with the PAI for the 18 smallest counties in Table 6.

SSI-Adjusted PAI for Large Counties

Table 5 shows the SSI-adjusted PAI for California's 40 largest counties. When applied to statewide data, the methodology used to generate Table 5 yields a PAI of 0.371.

Table 5

County	PAI	Rank
Alameda	0.400	16
Butte	0.341	21
Contra Costa	0.308	29
El Dorado	0.335	23
Fresno	0.548	6
Humboldt	0.331	25
Imperial	0.476	11
Kern	0.451	12
Kings	0.613	3
Lake	0.381	19
Los Angeles	0.339	22
Madera	0.492	9
Marin	0.263	34
Mendocino	0.427	14
Merced	0.502	8
Monterey ¹	0.301	30
Napa	0.181	39
Nevada ¹	0.301	31
Orange	0.241	37
Placer	0.312	28

County	PAI	Rank
Riverside	0.333	24
Sacramento	0.589	4
San Bernardino	0.479	10
San Diego	0.229	38
San Francisco	0.270	33
San Joaquin	0.433	13
San Luis Obispo	0.260	35
San Mateo	0.159	40
Santa Barbara	0.313	27
Santa Clara	0.399	17
Santa Cruz	0.324	26
Shasta	0.389	18
Solano	0.565	5
Sonoma	0.258	36
Stanislaus	0.514	7
Sutter	0.371	20
Tulare	0.617	2
Ventura	0.408	15
Yolo	0.278	32
Yuba	0.699	1

¹The County PAI is listed here to three significant digits (the three digits to the right of the decimal point). However, the PAI used to calculate the county ranking contained 15 significant digits. Viewed with four significant digits, Monterey County's PAI is 0.3015 and Nevada County's PAI is 0.3010. Thus, their respective ranks are 30 and 31.

SSI-Adjusted PAI for All Counties – Alternate Methodology

Table 6 shows the SSI-adjusted PAI for all California counties calculated with income data from the Small Area Income and Poverty Estimates and the 2000 Census instead of the American Community Survey (ACS). This alternate methodology is necessary because income data from the ACS, which are used to calculate PAI for California's 40 largest counties, are not available for the 18 smallest counties (denoted by *). When applied to statewide data, the methodology used to generate Table 6 yields a PAI of 0.375 for California.

Table 6

County	PAI	Rank
Alameda	0.417	22
Alpine*	0.466	15
Amador*	0.367	31
Butte	0.357	32
Calaveras*	0.354	33
Colusa*	0.372	30
Contra Costa	0.304	43
Del Norte*	0.538	5
El Dorado	0.285	45
Fresno	0.571	4
Glenn* ¹	0.386	28
Humboldt	0.343	35
Imperial	0.500	10
Inyo*	0.435	20
Kern	0.451	18
Kings	0.503	9
Lake	0.403	25
Lassen*	0.335	37
Los Angeles	0.350	34
Madera	0.490	12
Marin	0.226	54
Mariposa*	0.284	46
Mendocino	0.464	16
Merced	0.514	8
Modoc*	0.418	21
Mono*	0.176	57
Monterey	0.326	38
Napa	0.207	56
Nevada	0.283	47

County	PAI	Rank
Orange	0.232	53
Placer	0.303	44
Plumas*	0.256	49
Riverside	0.342	36
Sacramento	0.590	3
San Benito*	0.495	11
San Bernardino	0.479	13
San Diego	0.225	55
San Francisco	0.281	48
San Joaquin	0.474	14
San Luis Obispo	0.242	52
San Mateo	0.161	58
Santa Barbara ²	0.310	41
Santa Clara	0.392	27
Santa Cruz ²	0.310	40
Shasta ¹	0.386	29
Sierra*	0.253	50
Siskiyou*	0.446	19
Solano	0.531	6
Sonoma	0.246	51
Stanislaus	0.527	7
Sutter	0.406	24
Tehama*	0.460	17
Trinity*	0.307	42
Tulare	0.603	2
Tuolumne*	0.410	23
Ventura	0.394	26
Yolo	0.312	39
Yuba	0.604	1

¹⁻²The County PAI is listed here to three significant digits (the three digits to the right of the decimal point). However, the PAI used to calculate the county ranking contained 15 significant digits. Viewed with four significant digits, Glenn County's PAI is 0.3862 and Shasta County's PAI is 0.3857. Thus, their respective ranks are 28 and 29. Similarly, Santa Cruz County's PAI is 0.3101 and Santa Barbara County's PAI is 0.3097.

Merged SSI-Adjusted PAI – All Counties

The most accurate SSI-adjusted PAI for California's 40 largest counties is presented in Table 5. The most accurate SSI-adjusted PAI for California's 18 smallest counties (denoted by *) is presented in Table 6. Table 7 merges Tables 5 and 6 to show the most accurate SSI-adjusted PAI available for each county, listed alphabetically.

Table 7

County	PAI	Rank
Alameda	0.400	24
Alpine*	0.466	14
Amador*	0.367	31
Butte	0.341	33
Calaveras	0.354	32
Colusa*	0.372	29
Contra Costa	0.308	42
Del Norte*	0.538	7
El Dorado ¹	0.335	36
Fresno	0.548	6
Glenn*	0.386	27
Humboldt	0.331	38
Imperial	0.476	13
Inyo*	0.435	18
Kern	0.451	16
Kings	0.613	3
Lake	0.381	28
Lassen* ¹	0.335	35
Los Angeles	0.339	34
Madera	0.492	11
Marin	0.263	49
Mariposa*	0.284	46
Mendocino	0.427	20
Merced	0.502	9
Modoc*	0.418	21
Mono*	0.176	57
Monterey ²	0.301	44
Napa	0.181	56
Nevada ²	0.301	45

County	PAI	Rank
Orange	0.241	54
Placer	0.312	41
Plumas*	0.256	52
Riverside	0.333	37
Sacramento	0.589	4
San Benito*	0.495	10
San Bernardino	0.479	12
San Diego	0.229	55
San Francisco	0.270	48
San Joaquin	0.433	19
San Luis Obispo	0.260	50
San Mateo	0.159	58
Santa Barbara	0.313	40
Santa Clara	0.399	25
Santa Cruz	0.324	39
Shasta	0.389	26
Sierra*	0.253	53
Siskiyou*	0.446	17
Solano	0.565	5
Sonoma	0.258	51
Stanislaus	0.514	8
Sutter	0.371	30
Tehama*	0.460	15
Trinity*	0.307	43
Tulare	0.617	2
Tuolumne*	0.410	22
Ventura	0.408	23
Yolo	0.278	47
Yuba	0.699	1

¹⁻²The County PAI is listed here to three significant digits (the three digits to the right of the decimal point). However, the PAI used to calculate the county ranking contained 15 significant digits. Viewed with four significant digits, Lassen County's PAI is 0.3348 and El Dorado County's PAI is 0.3345. Thus, their respective ranks are 35 and 36. Similarly, Monterey County's PAI is 0.3015 and Nevada County's PAI is 0.3010.

Merged SSI-Adjusted PAI – All Counties by Rank

The most accurate SSI-adjusted PAI for California's 40 largest counties is presented in Table 5. The most accurate SSI-adjusted PAI for California's 18 smallest counties (denoted by *) is presented in Table 6. Table 8 merges Tables 5 and 6 to show the most accurate SSI-adjusted PAI available for each county, listed by rank.

Table 8

County	PAI	Rank
Yuba	0.699	1
Tulare	0.617	2
Kings	0.613	3
Sacramento	0.589	4
Solano	0.565	5
Fresno	0.548	6
Del Norte*	0.538	7
Stanislaus	0.514	8
Merced	0.502	9
San Benito*	0.495	10
Madera	0.492	11
San Bernardino	0.479	12
Imperial	0.476	13
Alpine*	0.466	14
Tehama*	0.460	15
Kern	0.451	16
Siskiyou*	0.446	17
Inyo*	0.435	18
San Joaquin	0.433	19
Mendocino	0.427	20
Modoc*	0.418	21
Tuolumne*	0.410	22
Ventura	0.408	23
Alameda	0.400	24
Santa Clara	0.399	25
Shasta	0.389	26
Glenn*	0.386	27
Lake	0.381	28
Colusa*	0.372	29

County	PAI	Rank
Sutter	0.371	30
Amador*	0.367	31
Calaveras*	0.354	32
Butte	0.341	33
Los Angeles	0.339	34
Lassen* ¹	0.335	35
El Dorado ¹	0.335	36
Riverside	0.333	37
Humboldt	0.331	38
Santa Cruz	0.324	39
Santa Barbara	0.313	40
Placer	0.312	41
Contra Costa	0.308	42
Trinity*	0.307	43
Monterey ²	0.301	44
Nevada ²	0.301	45
Mariposa*	0.284	46
Yolo	0.278	47
San Francisco	0.270	48
Marin	0.263	49
San Luis Obispo	0.260	50
Sonoma	0.258	51
Plumas*	0.256	52
Sierra*	0.253	53
Orange	0.241	54
San Diego	0.229	55
Napa	0.181	56
Mono*	0.176	57
San Mateo	0.159	58

¹⁻²The County PAI is listed here to three significant digits (the three digits to the right of the decimal point). However, the PAI used to calculate the county ranking contained 15 significant digits. Viewed with four significant digits, Lassen County's PAI is 0.3348 and El Dorado County's PAI is 0.3345. Thus, their respective ranks are 35 and 36. Similarly, Monterey County's PAI is 0.3015 and Nevada County's PAI is 0.3010.

SSI-Adjusted PAI Methodology

To generate the SSI-adjusted PAI shown in Tables 5-8, the estimated SSI population with income below 125 percent of FPG was subtracted from the population of individuals who are income-eligible for FSP. In contrast, to generate the PAI presented in the main body of this report, the total number of SSI participants was subtracted from the population of individuals who are income-eligible for FSP. Please see Step 7 of the methodologies for details.

Methodology for Table 5 and Large Counties in Tables 7-8

This methodology details the calculations used for the SSI-adjusted PAI of California's 40 largest counties as show in Table 5 above. PAI for California's 40 largest counties in Tables 7-8 were also calculated using this methodology.

Step 1: Determine the annual count of Food Stamp Program participants for the 2008 calendar year by summing monthly participation counts from January 2008 through December 2008.

Sum of Monthly Participation from January through December = Annual Count of Food Stamp Program Participants

Data Source: Food Stamp Program participation data for the state of California and all California counties are available at: <http://www.dss.cahwnet.gov/research/PG352.htm>.

Step 2: Determine the average monthly participation for the Food Distribution Program on Indian Reservations (FDPIR) during the 2008 calendar year.

Data Source: Average monthly FDPIR participation data were obtained from the USDA Food and Nutrition Service Western Regional Office. These data are available in Appendix B.

Data were not available to identify the county of residence for each FDPIR participant. Therefore, FDPIR program directors estimated the number of participants residing in each county. Although this method is not exact, the number of FDPIR participants is so low compared to the number of individuals with incomes below 125 percent of the federal poverty guidelines that any error in the directors' estimates should have a negligible effect on PAI calculations. To quantify the statewide difference between the two populations, there were 6,809 FDPIR participants and 6,338,846 individuals with incomes below 125 percent of the federal poverty guidelines throughout California in 2008.

Step 3: Determine the number of individuals who received emergency food stamp benefits (disaster assistance) during the 2008 calendar year.

Data Source: Disaster assistance participation data were provided by the California Department of Social Services.

Note: There were no emergency food stamp benefits distributed in any California counties for the 2008 calendar year.

Step 4: Calculate the adjusted number of annual Food Stamp Program participants by subtracting Step 3 from Step 1.

Annual Count of Food Stamp Program Participants – Number of Emergency Food Stamp Recipients = Adjusted Annual Count of Food Stamp Program Participants

Step 5: Calculate the adjusted number of average monthly Food Stamp participants for the 2008 calendar year by dividing Step 4 by 12.

Adjusted Annual County of Food Stamp Program Participants ÷ 12 months = Adjusted Number of Average Monthly Food Stamp Program Participants

Step 6: Determine number of individuals with incomes below 125 percent of the federal poverty guidelines (FPG) for the 2008 calendar year. Eligibility criteria for the Food Stamp Program allow participants to have incomes below 130 percent of FPG. However, annual county estimates are not available for the number of individuals with incomes below 130 percent of FPG. Therefore, having an income below 125 percent of FPG is used as a proxy for Food Stamp Program income eligibility.

Data Source: County-specific estimates of the number of individuals with incomes below 125 percent of FPG are available through the 2008 American Community Survey (ACS) at:

http://factfinder.census.gov/servlet/DatasetMainPageServlet?_program=ACS&_submenuid=datasets_2&_lang=en&_ts=

(2008 American Community Survey 1-year Estimates, Table B170002)

Step 7: Determine the number of Supplemental Security Income (SSI) participants for the 2008 calendar year. In California, SSI recipients are not eligible to participate in the Food Stamp Program. Therefore, any SSI recipients with incomes below 125 percent of FPG should be removed from the total number of individuals that are income-eligible for the Food Stamp Program. Unfortunately, there are no county-specific data that specify the number of SSI recipients whose incomes fall below 125 percent of FPG.

USDA estimated that 299,007 SSI recipients had incomes below 125 percent of FPG in California during 2008. The total number of SSI recipients in California was 1,270,223 for 2008. This implies that 23.539% of SSI recipients had incomes below 125 percent of FPG for in California during 2008. ($299,007 \text{ SSI recipients with incomes below 125\% FPG} \div 1,270,223 \text{ SSI recipients} = 23.539\%$). This percentage is used to adjust the income-eligible food stamp population for the number of SSI recipients with incomes below 125 percent of FPG.

Data Sources:

- The USDA's estimate of California's SSI recipients with incomes below 125 percent of FPG is published in *Calculating the SNAP Program Access Index: A Step-by-Step Guide* by the USDA Food and Nutrition Service, available at: <http://www.fns.usda.gov/ora/MENU/Published/snap/FILES/Other/pai2008.pdf>.
- California SSI data is available at: http://www.ssa.gov/policy/docs/statcomps/ssi_sc/index.html.

Step 8: Calculate the adjusted number of individuals with incomes below 125 percent of FPG by subtracting Steps 2 and 7 from Step 6.

Individuals with Incomes Below 125 % FPG - Average Monthly FDPIR Participation - SSI Participants with Incomes Below 125% FPG

Step 9: Calculate the Program Access Index for 2008 by dividing Step 5 by Step 8.

Adjusted Number of Average Monthly Food Stamp Participants for 2008 \div Adjusted Number of Individuals with Incomes Below 125% FPG = County PAI

Step 10: Rank order counties by PAI. The number one ranked county has the highest PAI. That is, the number one ranked county has the highest Food Stamp Program utilization relative to the total number of income-eligible individuals.

Methodology for Table 6 and Small Counties in Tables 7-8

This methodology details the calculations used for the SSI-adjusted PAI of all California counties that is shown in Table 6. In Tables 7 and 8, this methodology was used only for California's 18 smallest counties. As detailed in Step 6 below, this methodology uses income data from the Small Area Income and Poverty Estimates and the 2000 Census. This is necessary because income data from the American Community Survey, used to calculate PAI for California's 40 largest counties, are not available for California's 18 smallest counties.

Step 1: Determine the annual count of Food Stamp Program participants for the 2008 calendar year by summing monthly participation counts from January 2008 through December 2008.

Sum of Monthly Participation from January through December = Annual Count of Food Stamp Program Participants

Data Source: Food Stamp Program participation data for the state of California and all California counties are available at: <http://www.dss.cahwnet.gov/research/PG352.htm>.

Step 2: Determine the average monthly participation for the Food Distribution Program on Indian Reservations (FDPIR) during the 2008 calendar year.

Data Source: Average monthly FDPIR participation data were obtained from the USDA Food and Nutrition Service Western Regional Office. These data are available in Appendix B.

Data were not available to identify the county of residence for each FDPIR participant. Therefore, FDPIR program directors estimated the number of participants residing in each county. Although this method is not exact, the number of FDPIR participants is so low compared to the number of individuals with incomes below 125 percent of the federal poverty guidelines that any error in the directors' estimates should have a negligible effect on PAI calculations. To quantify the statewide difference between the two populations, there were 6,809 FDPIR participants and 6,338,846 individuals with

incomes below 125 percent of the federal poverty guidelines throughout California in 2008.

Step 3: Determine the number of individuals who received emergency food stamp benefits (disaster assistance) during the 2008 calendar year.

Data Source: Disaster assistance participation data were provided by the California Department of Social Services.

Note: There were no emergency food stamp benefits distributed in any California counties for the 2008 calendar year.

Step 4: Calculate the adjusted number of annual Food Stamp Program participants by subtracting Step 3 from Step 1.

Annual Count of Food Stamp Program Participants – Number of Emergency Food Stamp Recipients = Adjusted Annual Count of Food Stamp Program Participants

Step 5: Calculate the adjusted number of average monthly Food Stamp participants for the 2008 calendar year by dividing Step 4 by 12.

Adjusted Annual County of Food Stamp Program Participants ÷ 12 months = Adjusted Number of Average Monthly Food Stamp Program Participants

Step 6: Determine number of individuals with incomes below 125 percent of the federal poverty guidelines (FPG).

To estimate the number of individuals with incomes below 125 percent of FPG in all of California's counties (including the 18 smallest) requires data from the 2008 Small Area Income and Poverty Estimates (SAIPE) and the 2000 national census. SAIPE provides an estimate of the number of individuals in each county with incomes below 100 percent of FPG. The ratio of individuals with incomes below 125 percent of FPG to those with incomes below 100 percent of FPG was determined for each county using 2000 census data.⁸ This ratio was multiplied by the number of people having incomes below 100 percent of FPG (as reported in SAIPE). Although this method is not exact, it

⁸ 2000 is the latest year for which data are available quantifying the population with income below 125 percent of FPG in California's 18 smallest counties.

gives the most accurate and most up-to-date estimate of the population living below 125 percent of FPG in the small counties that are not included in the ACS.

Individuals with Incomes Below 125% FPG ÷ Individuals with Incomes Below 100% FPG = Income Ratio from 2000 Census Data

Income Ratio x SAIPE Estimate of Individuals with Incomes Below 100% FPG = Estimate of Individuals with Incomes Below 125% FPG

Data Sources:

- 2008 Small Area income and Poverty Estimates (SAIPE) data available at:
<http://www.census.gov/did/www/saipe/data/index.html>
- 2000 Census data available at:
http://factfinder.census.gov/servlet/DatasetMainPageServlet?_program=DEC&_submenuId=&_lang=en&_ts
(Census 2000 Summary File 3 , Table P88)

Step 7: Determine the number of Supplemental Security Income (SSI) participants for the 2008 calendar year. In California, SSI recipients are not eligible to participate in the Food Stamp Program. Therefore, any SSI recipients with incomes below 125 percent of FPG should be removed from the total number of individuals that are income-eligible for the Food Stamp Program. Unfortunately, there are no county-specific data that specify the number of SSI recipients whose incomes fall below 125 percent of FPG.

USDA estimated that 299,007 SSI recipients had incomes below 125 percent of FPG in California during 2008. The total number of SSI recipients in California was 1,270,223 for 2008. This implies that 23.539% of SSI recipients had incomes below 125 percent of FPG for in California during 2008. (*299,007 SSI recipients with incomes below 125% FPG ÷ 1,270,223 SSI recipients = 23.539%*). This percentage is used to adjust the income-eligible food stamp population for the number of SSI recipients with incomes below 125 percent of FPG.

Data Sources:

- The USDA's estimate of California's SSI recipients with incomes below 125 percent of FPG is published in *Calculating the SNAP Program Access Index: A Step-by-Step Guide* by the USDA Food and Nutrition Service, available at:
<http://www.fns.usda.gov/ora/MENU/Published/snap/FILES/Other/pai2008.pdf>.
- California SSI data is available at:
http://www.ssa.gov/policy/docs/statcomps/ssi_sc/index.html.

Step 9: Calculate the Program Access Index for 2008 by dividing Step 5 by Step 8.

Adjusted Number of Average Monthly Food Stamp Program Participants ÷ Adjusted Number of Individuals with Incomes Below 125% of FPG = County PAI

Step 10: Rank order counties by PAI. The number one ranked county has the highest PAI. That is, the number one ranked county has the highest Food Stamp Program utilization relative to the total number of income-eligible individuals.

Appendix B

Average monthly FDPIR participation data for 2008 were obtained from the USDA Food and Nutrition Service Western Regional Office. These data are accurate as of November 2009.

California Indian Tribal Organizations Administering FDPIR	Average Monthly Participation in Calendar Year 2008
Fort Mojave Food Distribution	175
Hoopla Food Distribution Program	1,060
Riverside-San Bernardino Indian Health, Inc.	1,121
Southern California Tribal Chairmen's Association	729
Tule River Food Distribution Program	378
Sherwood Valley Food Program	2,811
Yurok Food Distribution Program	535
Total	6,809

References

^a United State Department of Agriculture Food and Nutrition Service, *Calculating the SNAP Program Access Index: A Step-by-Step Guide*, October 2009, available at: <http://www.fns.usda.gov/ora/menu/Published/SNAP/FILES/Other/pai2008.pdf>.

^b USDA, *Calculating the SNAP Program Access Index: A Step-by-Step Guide*, October 2009, available at: <http://www.fns.usda.gov/ora/menu/Published/SNAP/FILES/Other/pai2008.pdf>.

^c California Food Policy Advocates, *Cash-Out in California: A History of Help and Harm*, August 2003, available at: <http://www.cfpa.net/CashoutinCA2003.pdf>.

^d California Food Policy Advocates, *Cash-Out in California: A History of Help and Harm*, August 2003, available at: <http://www.cfpa.net/CashoutinCA2003.pdf>.