

gave the following explanation for the small number of public assistance recipients who were purchasing food stamps:

. . . when a person receives assistance, particularly mothers, and it averages around \$16 per child, it's awfully hard to buy a lot of food and then have set aside money for rent, for clothing, and incidentals that they have to have.

Mrs. Wilkinson stated that transportation problems were also responsible for the decline in participation:

. . . I think that the transportation problem is very acute in our county. As you well know, the Negroes who live out in the county, they are charged \$5 to come in to get the food stamps. . . .

Mrs. Helen Randale, who lives in Greene County, testified that she had to pay \$3 for food stamps and \$2 for transportation to obtain the stamps.

Program Inadequacies

In both food programs, the needs of the poor are subordinated to other interests. Since the surplus commodity program was conceived of as an efficacious means of disposing of farm surplus and thereby protecting farm prices, the Department of Agriculture, generally, has not considered the nutritional needs of those who depend almost entirely on surplus foods for their basic diet.

The Food Stamp Act attempts to provide the poor with more adequate diets and, at the same time, protect farmers and commercial food suppliers. The legislative method used to accomplish these dual objectives was to require the stamp recipient to continue to spend the amount he normally spent for food and then to give him a bonus payment that would enable him to increase his consumption of food. The insistence that stamps be used to supplement rather than supply regular food needs does not take into account the realities of the budgets of poor people, who must often choose between having adequate food, clothing, or shelter because there is not money enough for all three.

The Department of Agriculture, in its regulations implementing the food programs and other administrative action, has further weakened the effectiveness of the programs as vehicles for providing the poor with adequate diets.

The Food Stamp Act specifies that stamp prices are to be set for each family at an amount determined to be equivalent to their normal expenditures for food.⁹ The Department, however, has not based stamp prices on individual determinations of "normal expenditures", but rather on average expenditures for families of the same size and income. Thus a substantial number of families must pay more for the stamps than they normally pay for food.

Some examples of the cost of food stamps are:

A family of four with a monthly income of \$80 must pay \$36 (45% of its income) towards food stamps and receives \$68 worth of stamps. If their monthly income increases to \$90, they must pay \$4 of the \$10 increase towards food stamps (for a total of \$40) and receive \$70 worth of stamps—a value increase of only \$2.

A family of eight with a monthly income of \$30 must pay \$10 (33⅓% of its income) and receives \$84 worth of stamps. Should their income increase to \$40, \$6 of the \$10 increase must be contributed to stamp costs. Although the amount of the family's contribution has increased by \$6, the value of the stamps received remains the same—\$84.

Stamp prices have been established with little consideration given to the actual food-buying practices of the poor, particularly in rural areas where the poor traditionally mortgage their crops and subsist on credit purchases throughout the year. Thus, income earned is not a reliable indication of cash actually available each month for purchasing food. The amount the poor have to spend on food, moreover, in any one month is dependent on such variables as what bills have to be paid, what emergencies have arisen, and whether work was available in the month in question. In addition, the standardized pay scale does not take into consideration variations in ages of family members which affect the type and quantity of food needed, or seasonal changes in income.

The schedules of stamp prices set up by the Department, moreover, do not reflect the differences between the amounts spent for food in urban and rural areas and thus penalize the rural poor by assuming their food expenditures are the same as those of their urban counterparts. The stamp issuance plan makes

⁹ 7 U.S.C. § 2016(b).