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OFFICE OF THE GOVERNOR

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BILL ANOATUBBY

GOVERNOR

March 9, 2007

Ms. Nancy Theodore, Program Analyst
Food Distribution Division/USDA
3101 Park Center Drive, Room 506
Alexandria, VA 22302

Dear Ms. Theodore:

The conscientious work of the national FDPIR Funding Methodology Work Group is key to future equity in funding all FDPIR programs, and is appreciated. Likewise, USDA's conducting opportunities for tribal consultation in each region regarding this important matter demonstrates the United States Department of Agriculture's earnestness in proceeding thoughtfully in this process. As requested in your correspondence of November 28, 2006, we provide the following comments.

The preliminary recommendation outlined by the workgroup appears to largely achieve the original objective of developing a simple methodology that is fair and equitable.

- Component 1: The base of \$10,000, while somewhat arbitrary, does appear to protect the smallest tribes and ensure their ability to deliver services.
- Component 2: This portion of the methodology certainly adds a complex dimension to the calculations, as well as a tendency to perpetuate past inequities. We would prefer that current/past grant awards not be used as a basis for any future methodology.
- Component 3: Participation is appropriately a primary cost driver for allocating administrative funding for the FDPIR. We fully support this component whereby each tribe's percentage share of the national participation level determines a significant portion of their percent of funding.

It seems entirely appropriate that the objective portions of the funding methodology be calculated at the national level, leaving a small discretionary portion available for negotiation at the regional level. This will certainly save time for both federal and tribal staff and retain objectivity in the process.

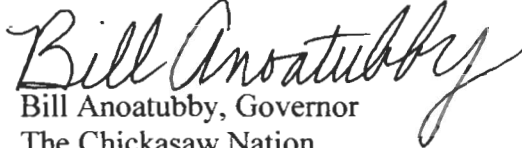
We recommend a level of 10% of the federal appropriation be set aside for negotiation purposes at the regional level, to supplement funding where most appropriate, based on communications between the program staff and regional office. The work group would benefit from developing some guidelines for this process as long as discretion at the regional level is retained.

The proposed methodology must be easily understood, having as few variables as possible while still ensuring reasonable equity. Omission of component #2 would decidedly simplify the process and its absence would probably have little resulting impact. The simple straightforward method proposed will allow program managers to more easily make accurate projections for future years.

Resources continue to be limited in this program and thus, must be distributed with great care for ensuring equity and fairness to all. We applaud your stellar efforts in staying the course toward a simple and equitable solution. Certainly we support the gradual implementation of the new methodology over a maximum period of three to four years.

We appreciate the USDA's commitment to this initiative and look forward to final implementation of this funding methodology. If more information is needed, please call Ms. Melinda Newport, director of nutrition services, at (580) 436-7296.

Sincerely,


Bill Anoatubby, Governor
The Chickasaw Nation