



CROW CREEK SIOUX TRIBE

FORT THOMPSON, SOUTH DAKOTA 57339

March 19, 2007

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Ms. Nancy Theodore, Program Analyst
USDA Food Distribution Division
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. 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, we provide the following comments.

- The Food Distribution Program continues to be one of the greatly needed programs of the Crow Creek Sioux Tribe.

- We would prefer that current/past grant awards not be used as a basis for any future methodology.

- The proposed methodology must be easily understood, having as few variables as possible while still ensuring reasonable equity.

- Within the last two years USDA has not given efficient amount of money for daily operations. Unexpected costs such as equipment are always a concern in an already under funded budget.

- Under no circumstances should the number of participation be a factor in a funding formula.

- The uniqueness of each tribe should be taken into account. There are too many disparities in how services are provided to the people.

- It should be mandatory that this funding work group have tribal representation.

- USDA/FNS has provided no information charts that show the tribes what the impacts are going to be, what are the losses or gains?

THE PROPOSED METHODOLOGY FOR THE FUNDING OF...



Why implement a process whose consequences are unknown? I believe that we can all cite examples of unintended consequences that were far worse than the problems they were to correct. I know no one in USDA is trying to irreparably harm any agency. I am not blind to the fact that some may need more administrative funding than they may have received in the past.

The federal government has inherent trust responsibilities to the tribes which includes the right to negotiate. By simply adding a small fraction of the budget to be negotiated, this is not a true form of negotiation. Why are there two sets of regulations? By implementing a funding formula, some tribes will lose funds which in turn will create a loss of services to the people they serve. Programs are unable to operate effectively because they are locked into participation based funding and there are too many other factors that aren't considered, you become numbers and services are cut to the people that the program was intended for because budgets are based strictly on a funding formula.

Historically some regions have consistently turned back funds because they were not able to spend their allocated funding amounts. Why would FNS give more funds to any region that hasn't historically spent their funds?

We applaud your efforts and commitment to this initiative and urge USDA to continue to work on finding other solutions to this funding formula to achieve a simple and equitable solution. I urge USDA to continue to work with the Tribes.

Sincerely,

A handwritten signature in cursive script that reads "Lester Thompson Jr.".

Lester Thompson Jr., Chairman
Crow Creek Sioux Tribe

CC: file

In unity with the tribes

Crow Creek Sioux Tribe