

GILA RIVER INDIAN COMMUNITY

Executive Office of the Governor & Lieutenant Governor

William R. Rhodes
Governor



Jennifer Allison-Ray
Lieutenant Governor

March 7, 2007

Nancy Theodore
USDA, Food and Nutrition Service
3101 Park Center Drive, Room 506
Alexandria, Virginia 22302

Re: Gila River Indian Community comments on FDPIR Funding Methodology

Dear Ms. Theodore:

Our Community would like to take this opportunity to provide comments on the proposed new methodology for allocating Food Distribution Program on Indian Reservations (FDPIR) on allocating administrative funds. Through our program, we serve both the Ak Chin Indian Community as well as our Community. It is fairly clear that prior fiscal year funds provided per participant is not balanced and does not seem to have a rational correlation with any particular funding factors.

The figures presented by your agency reflect that certain tribes with fewer participants are receiving larger amounts of dollars per participant. The proposed methodology appears to have a more comprehensive formula in addressing the many aspects of the problem leading to inequities in funding. More important is that your agency, through the work of the Work Group identified in your letter, the operational differences that exist between states and Indian Tribal Organizations (ITO's).

Our staff has reviewed the proposed methodology and developed several scenarios on the impacts to our Community. In doing so, staff has made the following recommendations that will serve as our comments:

- It is believed that the approach to the funding methodology is an appropriate one in order to funding FDPIR that is balanced and equitable;
- That other ITO's that are impacted by the formula which will result in a smaller allocation due to their participation numbers should be given special consideration in the funding formula that will lessen the reduction in funding;
- That any negotiated process adopted as part of the formula be simple and straightforward and not become a burdensome one that will not allow ITO's and your agency to be more efficient in paperwork and timelines;

- Consideration of ITO's operations based on the additional costs for those who have larger geographical areas to serve and the infrastructure they have in meeting the needs of the participants as part of their funding formula, such as i.e., tail-gating, warehouse and vehicle maintenance expense, in Component 3 of the proposed formula;

We understand that this is the very first step in reviewing and commenting on any final methodology being proposed. We believe that ITO's will be given other opportunities to review and comment on any changes, if any, are proposed in the next few months.

We understand that President Bush's proposed FY 2007-2008 budget provides an increase, even though nominal, that it will provide the basis necessary in the funding levels to make this proposed or any other proposed formula in meeting the needs in Indian Country.

Respectfully,

Handwritten signature of William R. Rhodes, dated 3-7-07.

William R. Rhodes, Governor
Gila River Indian Community

Cc: Lt. Governor Jennifer Allison-Ray
Jose Solarez, Community Services Director
James Jenkins, Acting Finance Director
Thomas Murphy, Assistant Legal Counsel
Henrietta Henry, Director of Food Distribution Program