

# Sac and Fox Nation

Route 2, Box 246

Stroud, OK 74079



*Principal Chief* KAY RHOADS  
*Second Chief* DARRELL L. GRAY  
*Secretary* GEORGE THURMAN  
*Treasurer* MICHAEL W. HACKBARTH  
*Committee Member* AUSTIN GRANT

March 16, 2007

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

RE: Sac and Fox Nation Comments on FDPIR Funding Methodology

Dear Ms. Theodore,

This letter represents the Sac and Fox Nation's response concerning the FDPIR Funding Methodology Work Group's request for comments regarding the evolving approach proposed in the new funding methodology (Attachment C). The Sac and Fox Nation would like to commend the Funding Methodology Work Group for their much needed diligence in bringing this important matter before the Indian Tribal Organizations (ITOs) and State Agencies that implement the Food Distribution Program on Indian Reservations (FDPIR) on behalf of the members of our tribal communities. We would like to take this opportunity to briefly share our comments on the proposed new methodology for allocating FDPIR administrative funds that is more equitable and better supports program operations.

## **BASIC GRANT AMOUNT**

**Component 1:** The \$10,000. base appears to protect the small tribes while ensuring their ability to deliver continued services to their tribal members.

**Component 2:** Based on current/past grant awards, we see how using the previous years funding levels can hinder a tribe's progress in implementing the FDPIR program while creating funding inequities among the FDPIR programs in various regions. We would prefer that the Work Group find this method obsolete and that it not be included in the paradigm shift that will create a fair and balanced Funding Methodology that would benefit the majority of tribes in all regions.

**Component 3:** A Funding Methodology based on previous participation levels instead of previous funding levels would help create a fair and equitable method for distributing funds to ITOs that would account for the variations in the number of participants served as participation levels may slightly rise or fall.

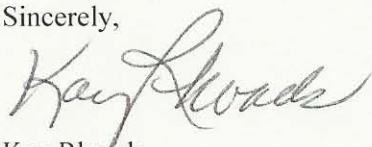
## **REGIONAL NEGOTIATED FUNDING AMOUNT**

**Component 4:** Using each region's average monthly participation, for the most recent three fiscal years, to divide the *National Funding Allocation* will certainly insure a fair and equitable Funding Methodology practically all by itself. However, utilizing an added Regional Negotiated Funding Amount of 15% of the Federal Appropriation to supplement funding where needed would ensure a smooth administrative funding transition as the new Funding Methodology is being implemented over a period of preferably three to four years. The negotiations would serve as a buffer for tribes to draw down additional funds from their region, saving both federal and tribal staff valuable time.

The Sac and Fox Nation would like to thank the FDPIR Funding Methodology Work Group for all the time, effort, and dedication that it took to narrow down the funding proposals to Attachment C by sticking to their established guidelines. The proposed methodology is easy to understand, provides sufficient funding to the smallest ITOs, considers operational differences between ITOs and State Agencies, includes a plan for the gradual implementation of the funding methodology, is fair to all ITOs by basing funding on regional participation, and maintains an easy to use component for additional funds through regional negotiations.

Thank you for your time, your attention, and the accommodating opportunity to provide comments on the proposed funding methodology. If more information is needed, please contact Landis McClellan, the Sac and Fox Nation's FDPIR Director at (918) 968-3030.

Sincerely,

A handwritten signature in cursive script that reads "Kay Rhoads".

Kay Rhoads  
Principal Chief  
Sac and Fox Nation

KR/rs

Cc: Landis McClellan, FDPIR Director