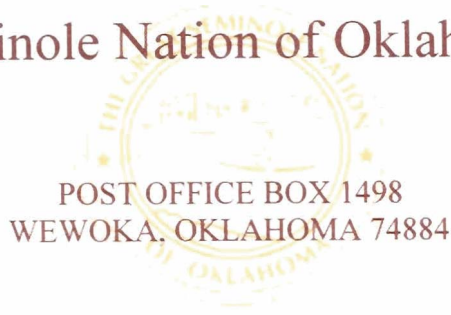


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Seminole Nation of Oklahoma



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EXECUTIVE DEPARTMENT

Enoch Kelly Haney, Principal Chief
Larry Harrison, Assistant Chief
Phone: (405) 257-7200
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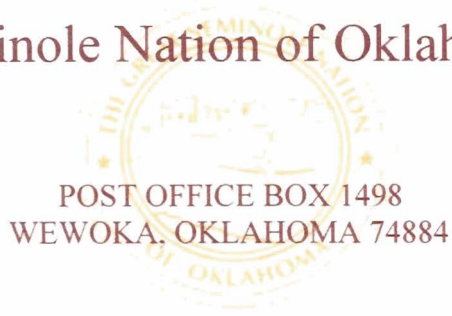
March 14, 2007

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

Dear Ms. Theodore,

This is in reference to your request regarding comments on a preliminary proposal for a new methodology in the allocation of federal administrative funds for the Food Distribution Programs on Indian Reservations (FDPIR) based on a proposed new funding formula which has been developed by the Funding Methodology Work Group established by the United States Department of Agriculture Food and Nutrition Service (USDA-FNS) to address as stated by USDA-FNS inequities in the current allocation process of administrative funds to FDPIR Indian Tribal Organizations (ITOs) and State Agencies.

The preliminary recommendation outlined by the workgroup appears to largely achieve the original objective of developing a simple methodology that is fair and equitable. The proposed funding formula will be structured as follows: There are two mechanisms by which FDPIR programs can receive funds: 1) a basic grant amount which will be comprised of three sub-components and 2) the regional negotiated amount, the basic grant amount would represent 85 percent of the total available funding and the regional negotiated amount would be about 15 percent minus the nutrition education set aside.



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Basic Grant Amount Component 1

- Sub-Component 1 is a fixed base amount, which would be \$10,000.00 for all programs regardless of participation levels.
- Sub-Component 2 is based on past expenditures and would be determined on FDPIR program expenditures from the last three years, excluding nutrition education funds and any capital expenditures of \$50,000.00 or more. The highest amount of expenditures in the three year period would be used, then calculate five percent of that amount.
- Sub-Component 3 is participation driven and provides the bulk of the funds for FDPIR programs using average monthly participation over the past three years. This would be times the base national participation average over a three year period (would depend on regional average, numbers will vary).

The Regional Negotiated Amount 15 Percent Component 2

- Component 2 FNS Regional Office would receive a portion of a 15 percent set aside based on its share of participation average for the past three years, this will assist for additional needs, ITOs would have an opportunity to negotiate under this component.

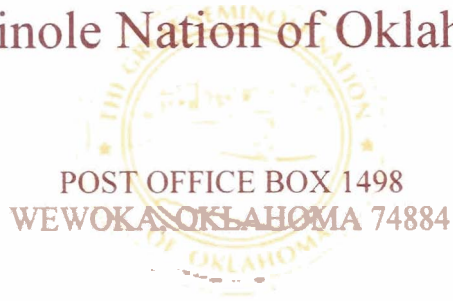
The Seminole Nation of Oklahoma supports the basic grant amount in component 1 and the sub-components and the recommendations made by the work group. There are questions regarding the dollar amounts and percentages; at this point the Seminole Nation of Oklahoma is comfortable with the recommended amount.

The Seminole Nation of Oklahoma supports the regional negotiated amount of 15 percent.

The Seminole Nation of Oklahoma supports the gradual implementation of the proposed new funding methodology over a maximum period of three to four years.

The Seminole Nation of Oklahoma would like to recommend to the Funding Methodology Work Group and USDA-FNS that once a final funding formula is adopted that an assessment/evaluation period of 2 to 3 years be considered to evaluate the effectiveness of the funding formula and make any adjustments necessary on percentages

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or dollar amounts to ensure USDA-FNS is providing a fair and equitable method of allocating funds to all FDPIR programs.

I would like to thank the Funding Methodology Work Group, USDA-FNS staff and all of the individuals that have contributed to this monumental task. It is clear that a lot of time and energy has been put into the development of this preliminary proposal, it has always been my understanding a system was needed to address the inequities of the current system of allocating administrative funds to FDPIR programs, a fair and equitable means of distributing funds to all FDPIR programs is necessary and welcomed.

Your thoughtful consideration of this request is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Enoch Kelly Haney".

Enoch Kelly Haney
Principal Chief of the Seminole Nation of Oklahoma

Cc. Mr. Clifton E. Broadous
FDPIR Program Director