



EIGHT NORTHERN INDIAN PUEBLOS COUNCIL, INC.
P.O. Box 969
San Juan Pueblo, New Mexico 87566

March 14, 2007

FDPIR-07-019

Ms. Nancy Theodore
USDA, Food and Nutrition Service
Food Distribution Division
3101 Park Center Drive, Room 506
Alexandria, Virginia 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 Reservation (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 currently allocation process of administrative funds to FDPIR Indian Tribal Organizations (ITOs) and State Agencies.

I have received and reviewed the Members of the Funding Methodology Work Group correspondence dated November 28, 2006 and was unable to attend the Tribal Leader consultation meeting held in Oklahoma City, Oklahoma, on January 17, 2007. I have reviewed the transcript of that meeting and after a very thorough review it is my understanding that USDA allocates \$27 million annually to the FDPIR programs and the proposed funding formula would help address the inequities that currently exist in the allocation process.

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.

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 received 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, ITO would have a opportunity to negotiated under this component

On behalf of the Eight Northern Indian Pueblos Council Inc., which is comprised of the Northern New Mexico Pueblos of Nambe, Picuris, Pojoaque, Santa Clara, San Ildefonso, Ohkay Owingeh, Tesuque and Taos (ENIPC Inc.), supports and commends USDA-FNS in its efforts to provide a mechanism to distribute administrative funds in a fair and equitable manner and therefore supports the Preliminary Proposed Funding Formula in the current concept, if additional amendments are made, the ENIPC Inc. would appreciate these changes be forward for our review and consideration.

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

ENIPC Inc. supports the regional negotiated amount of 15 percent.

ENIPC Inc. supports the gradual implementation of the proposed new funding methodology over a maximum period of three to four years.

ENIPC Inc. 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 or dollars 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 Formula Methodology Work Group, USDA-FNS staff and all 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. I look forward to working with the USDA-FNS. Should you require any additional information or clarification on this matter, please do not hesitate to contact my office @ (505) 747-1593 or Mr. Perry Martinez, FDPIR Program Director @ (505) 455-2288 or my office directly @ (505) 747-1593.

Sincerely,

John Gonzales
ENIPC, Executive Director

Cc. Rob Corabi, Controller
Perry Martinez, FDPIR Program Director
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