



Nez Perce

TRIBAL EXECUTIVE COMMITTEE
P.O. BOX 305 • LAPWAIL, IDAHO 83540 • (208) 843-2253

January 26, 2007

USDA, Food and Nutrition Service
Food Distribution Division
Attn: Nancy Theodore
3101 Park Center Drive, Room 506
Alexandria, Virginia 22302
Fax: 703-305-1410

RE: FDPIR Funding Methodology

Dear Ms. Theodore,

The Nez Perce Tribe appreciates the opportunity to provide comments on the proposal for the new methodology for allocating FDPIR administrative funding. The Nez Perce Tribe supports any efforts by the federal government to make programs that provide services to tribal members more efficient and balanced. It is apparent from the FY 06 administrative numbers that money provided per participant in the programs is not balanced and does not seem to have any rational correlation with any particular factors. As has been noted by FNS, some of the areas with the fewest participants are still receiving large amounts of dollars per participant.

The guidelines used to formulate the proposal appear to be comprehensive in nature in covering the many aspects of the problem that must be considered in such a task. The Nez Perce Tribe appreciates the consideration of the operational differences between the ITOs and the state agencies. The Tribe believes this is an important factor. It appears that this guideline is manifested in the Regional Negotiated Component of the formula. As such, it will be important if the methodology is adopted to emphasize this guideline in the rules adopted to govern the negotiations. Sophistication in infrastructure or other areas should not result in any ITO's being hindered in such a negotiation process.

The Tribe believes that the preliminary approach is an appropriate approach to funding FDPIR as it seems to provide a balanced and equitable structure. However, until it is actually utilized in real situations it is hard to assess the effectiveness of the new approach. There will probably be obstacles that need to be worked out during any implementation as ITOs and state agencies have to adjust to possible new funding levels and procedures. As long as there is a

willingness to be flexible in such implementation it should make such a transition easier.

The Nez Perce Tribe believes some consideration should be given to providing for adjustment to the base amount of component 1 of the funding methodology. Although Congressional funding does usually account for inflation, outside considerations such as the current conflict in Iraq have recently adversely effected many domestic programs and discretionary spending. Although dollars can be made up in the negotiated component, it might be beneficial to consider a flexible option.

The approach used in Component 2 appears to be well thought out to account for the differences in ITOs and state agencies by excluding large capital expenditures in the formula as many tribes do not make such capital outlays.

Component 3 appears to be the most important concept in the new funding methodology so that programs that provide services to large numbers of persons receive adequate funds. For FY 06 the Nez Perce Tribe served almost 600 persons per month. For ITOs that serve less people yet receive similar total dollars is not an equitable approach and it is practical to try and address such disparities by emphasizing program participation. It is hard to gauge whether using a three year average is the best approach but it does seem reasonable although it should be open to revision if necessary.

The Regional Negotiated Funding component seems a prudent method to make sure each program receives the dollars needed after calculating the amounts for the first three components of the methodology. The Nez Perce Tribe has concerns however that this process could become convoluted or put some ITOs at a disadvantage if they do not possess the personnel with the expertise for such a process. It is important that such a negotiated process be kept straightforward and not become a mass of paperwork and multiple deadlines that create a maze for people to complete.

Finally, the Nez Perce Tribe agrees with the ideas of a gradual implementation plan if the funding methodology is adopted. No organization or agency is ever ready to be faced with a sudden decline or reduction in funding. Phasing in the fiscal impact of the methodology is a prudent measure to enact such a change. With such an implementation, it would be important to provide with each allocation to the program the amount the program would have received under the new methodology. In this way, if any budget changes need to be made by the program, it can plan for them in advance. Also, a set time for the implementation of the methodology should be made such as a 3 or 5 year approach.

The Nez Perce Tribe appreciates the opportunity to provide comments on the proposal.

Sincerely,

Rebecca A. Miles
Chairman