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Officially known as the Zuni Tribe of the Zuni Indian Reservation

March 14, 2007

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

Dear Ms. Theodore:

This letter is in reference to your request for comments on a new method of allocating federal administrative funds for the Food Distribution Programs on Indian Reservations (FDPIR). Based on the newly developed Funding Methodology to avoid inequities in the current allocation process of administrative funds to the present Indian Tribal Organizations (ITOs) and State Agencies (SA), we fully support your efforts in solving this allocation inequity

We have received and reviewed the Funding Methodology Work Group correspondence dated November 28, 2006 and we were unable to attend the Tribal Leaders Meeting in Oklahoma on January 17, 2007. We were in a transition period with our Tribal Government and were pressed for time. We were represented by Ms. Celia Simplicio, Zuni FDP Director. All correspondence has been provided by her and other transcripts of other regional meetings.

After reviewing the documents, it is our understanding that the proposed funding formula would address the inequities that currently exist in the present allocation process. We feel the two (2) methods by which the programs will receive funds through 1) a basic grant amount, which has three (3) sub components and 2) the regional negotiated amount with the basic grant amount, would represent 85% of the total available funding. The regional negotiated amount would be about 15% minus the nutrition education set aside.

We support the Regional Negotiated Amount with the 15% component 2. The Regional Office would receive a portion of the 15% set aside based on its average participation level for the past three (3) years. This gives the other nineteen (19) ITOs in our region to request and negotiate based on this component.



We would like to commend the work group who we believe to be comprised of knowledgeable financial analysts. The formulas are based on the most current overall concept of operating a Food Distribution Program efficiently and effectively. We thank them for their tireless effort on a most difficult task in sought for the most equitable methods of funding.

We also support the gradual implementation of the proposed new funding methodology for a minimum period of three (3) to four (4) years.

We are requesting your very thoughtful consideration of this methodology and look forward to working with you. If you have any questions, please contact me at (505) 782-7021 or, contact Ms. Celia Simplicio, FDP Director at (505) 782-4463.

Sincerely,

Norman J. Cooeyate, Governor

Pueblo of Zuni