

From: Landis McClellan [lmcclellan@sacandfoxnation-nsn.gov]
Sent: Friday, March 16, 2007 8:18 PM
To: Theodore, Nancy
Subject: Sac and Fox Nation Comments on FDPIR Funding Methodology

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

Dear Ms. Theodore,

The Sac and Fox Nation Food Distribution Program on Indian Reservations (FDPIR) would like to commend the Funding Methodology Work Group for their much needed diligence in bringing this important matter before the Indian Tribal Organizations that implement the FDPIR program on behalf of the members of our tribal communities. A formal letter on behalf of the Sac and Fox Nation will follow shortly expressing in more detail our position concerning the evolving approach proposed in the new funding methodology. However, we would like to take this opportunity to briefly share our comments on the proposed new methodology for allocating FDPIR administrative funds.

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 would 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 create a fair and equitable method for distributing funds to ITO's 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 FDPIR 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 ITO's, considers operational differences between ITO's and State Agencies, includes a plan for the gradual implementation of the funding methodology, is fair to all ITO's by basing funding on regional participation, and maintains an easy to use component for additional funds through regional negotiations.

Thank you for your time, attention, and the opportunity to provide the comments on the proposed

funding methodology. If more information is needed, please call at (918) 968-3030.

Sincerely,

Landis McClellan
Director
Sac and Fox Nation
Food Distribution Program on Indian Reservations

RS/rs

cc: file