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Comments on new funding methodology for allocating federal administrative funding

There are many beneficial factors or elements involved with providing an efficient commodity food distribution funding methodology for tribal organizations. Some of these elements or factors are described below and are considered comments on the new funding methodology:

The ITO has historically been under-funded. The Shoshone-Bannock tribes does not agree with the funding methodology. We feel it would not be sufficient to cover all expenses for operating the ITO. Our program has experienced unforeseen emergency situations for refrigeration expenses of maintenance and repairs. Additional administrative costs would not be included and staff would not receive any step increases or cost of living expenses each year.

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- Treaty tribes have a unique relationship with the federal government.
The funding methodology will decrease funding in the future.
- The base grant amount should be sufficient to operate a large, medium or small FDIR program. The Shoshone-Bannock Tribes is a medium FDIR program.
- The total number of participants served should determine the base amount.
The number of sites or warehouses should be considered in determining a formula for distribution.
The number of personnel necessary to provide optimal food distribution services.
- Tail gating and/or delivery service expense
- Site development costs should be included for safety and improved operations
- Facility upgrades should be considered with operational costs.
- Conflicting regulations with TANF results in a loss of clients.
- Costs for telephones and equipment should be considered in funding programs.
- Costs of heating and cooling expenses should be considered.

- Maintenance expenses of delivery vehicles should be considered
The ITO nutrition and health component is necessary

Additional funding considerations should be given within any funding methodology should be allowed for other expenses:

- The existence of a centralized receiving warehouse.
- The existence of a vehicle fleet maintenance shop.
- Additional expenses for long distance delivery services.
- Costs for construction of facilities and sidewalks
- The existence of an Indirect Cost Agreement with the federal government.

Working Group Action Plan

Need for change – A uniform process for allocation of funds would be good, but it must be based on accurate demographic data and participation rates. Each tribe should document actual daily participation rates and types of services provided. Work Group Participation – The work group completed their assignments and considered operational differences among the ITO's and State Agencies. The amounts received seem reasonable.

Basic Grant Amount - The basic grant amount should be based on numbers of families served, and the economic and social factors should be considered in the planning process. Demographic information on the Fort Hall reservation indicates an enrollment of 4,875 Indian with 3,280 living on the reservation and 10% living off the reservation for employment and training. The poverty rate is 48% on the reservation. The unemployment rate is 50%.

The above figures do not include other federally recognized tribes who live on and off the Fort Hall Reservation who are eligible for program service. Eligible participants also include non-Indian residents. The FDIR program is non-discriminatory and has a five mile radius extended off-reservation for clients residing near the reservation. We cannot serve clients outside this boundary due to our operational plan.

Fixed Base Amount – Should be based on health and nutrition factors as well as economic, social and participation factors.

Recommended guidelines and do not meet program needs.

Past Expenditures - Allocated funding amounts not expended should be used for health and nutrition improvement

Participation Driven – This component is essential for program development and to ensure optimal success of the food distribution programs. The average monthly participation should be extended to five years, instead of 3 years.

Total Basic Grant Amount – the Social and economic benefit to the community should include a fourth component which could be health and wellness.

Regional Negotiated Amount - Regional differences should be based on economically depressed factors, i.e. high unemployment, and high energy costs.

The plan to distribute the available funds to ITO's/State Agencies based on need as determined on individual budget negotiations is fair and equitable with guidelines for the negotiation process. Training for staff should be provided in this area.

Proposed funding allocation process – Requests for supplemental funding requires a budget and negotiation process is acceptable.

Gradual Implementation Plan - A gradual implementation plan would limit the amount that any ITO/State Agency would gain during the implementation period is satisfactory.

Since the ITO's and State Agencies differ in many ways it seems difficult to develop a funding formula that would respond to all the differences. The recommendation to combine a funding formula with a set-aside of funds for Regional Offices to allocate among the ITO's and State Agencies, through negotiations would improve the process..

The Shoshone-Bannock Tribes does not agree with the funding methodology in principle, because it will decrease funding in the future. Increasing operational costs, including environmentally efficiency are not considered, and large land-based Treaty tribes should be protected from budget cuts in the future. Therefore the Shoshone-Bannock Tribes does not agree with the new funding methodology.

Sincerely,

LaNada War Jack
Executive Director

Cc: Fort Hall Business Council
Alice Yellow Hair