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CHEROKEE NATION™
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Chad "Cornassel" Smith
Principal Chief

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Joe Grayson, Jr.
Deputy Principal Chief

March 14, 2007

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

RE: FDPIR Funding Methodology

Dear Ms. Theodore:

This is in reference to the request for comments on the proposed methodology for allocating Food Distribution Program on Indian Reservations' (FDPIR) administrative funds. The administrators, past and present, of the Cherokee Nation Food Distribution Program on Indian Reservations have been advocating for an equitable allocation of administrative funds for many years. We are gratified to see these efforts may finally achieve fruition with this development.

We would like to acknowledge the Work Group Members that consists of Indian Tribal Organizations (ITOs), State Agencies and USDA FNS representatives who developed this methodology. It is apparent their striving to reach a level of equity for all Tribes and Agencies through many hours of effort, thought and negotiation resulted in the consensus of the Work Group.

Component 1, which is the fixed basic grant amount that establishes the foundation for each Indian Tribal Organizations and State Agencies' operating cost, seems to be a necessary part of overall funding if the sum is a realistic amount. A basic grant of \$20,000 may be more appropriate than the proposed \$10,000. The Cherokee Nation supports a Basic Grant Amount to ensure the ability to deliver services in all participation levels.

Component 2, which is based on past historical funding for regular operations, leaves some room for questions. What sorts of measures are used to determine that all past expenditures were prudent and necessary for program operations? Taking into consideration past historical funding has proven to display inequities in funding for Indian Tribal Organizations and State Agencies this can only work if past expenditures were economically and wisely spent. The Cherokee Nation recommends this component of the funding methodology be omitted due to the complexity of calculations that would result in the methodology and being based on past historical inequitable funding.

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Component 3, which is derived for each Indian Tribal Organization and State Agency to receive funding based on its percentage share of the national participation level averaged for the most recent three-year period is the most essential component of the methodology. The utmost critical function of the program is to provide services to eligible Native American households. It stands to reason that this function should originate the main component of the methodology. The Cherokee Nation fully supports participation as a primary cost driver in the funding methodology.

Component 4, a 15% set percentage of the federal appropriated amount to be set aside and allocated to FNS Regional Offices calculations based on its Regional share of participation averaged for the most recent three-year period provides an opportunity to negotiate additional or special funding at the Regional level proves to be a useful tool to address needs whether for regular program operations or emergency equipment needs. The Cherokee Nation supports this component for a 15% set percentage based on participation averaged to be used for each Region's negotiations.

The Cherokee Nation also concurs with the plan to implement the funding methodology over a period of 3 to 4 years. This would enable the time for development of the necessary administrative adjustments.

Your thoughtful consideration of these comments and recommendations is greatly appreciated. The Nation looks forward to further working with USDA FNS' commitment and final implementation on this funding methodology. Should you require any further information or clarification, do not hesitate to contact my office.

Sincerely,



Chad "Cornassel" Smith
Principal Chief
Cherokee Nation

Cc: Norman Merriman, Group Leader, Human Services Group
Jerry Snell, Director, Family Assistance Department
Bud Squirrel, Manager, Food Distribution Program