



# MENOMINEE INDIAN TRIBE OF WISCONSIN

P.O. Box 910  
Keshena, WI 54135-0910

March 12, 2007

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

Dear Ms. Theodore:

The Menominee Indian Tribe of Wisconsin (Tribe) has reviewed the proposed methodology to allocate federal administrative funds for the Food Distribution Program on Indian Reservations and has attended a public hearing regarding the proposal. After careful consideration of the proposal and after listening to further explanations provided by federal staff, it is important that the Tribe provide written comment. The proposed funding methodology is flawed in many respects and for these reasons, the Tribe is adamantly opposed to it.

It is believed that the current method for distributing administrative funds is not equitable. Though the new methodology provides a rationale for funding, many factors like unmet need, inflation, performance, and distribution of un-obligated funds are either not factored into the formula or are missing important components. The Tribe's comments on these areas are as follows:

- **Unmet Need.** The Tribe's FDPIR program has an enormous unmet need and has experienced stagnant funding for the past two-years. The Tribe does not have the necessary staff needed to operate the program and continues to rely on a shrinking pool of volunteers to meet the community's needs. Limited local funds only provide a fraction of what the actual need is. The Tribe is requesting that any proposed methodology recognize what the Tribe's unmet need is and increase funding based on this need.
- **Inflation.** Not included in this formula are standard inflationary rates. Though it was stated at the Green Bay public hearing that inflationary rates are considered yearly, the Tribe's allocations for the past two years proves otherwise; the Tribe has received the same level of federal funding in fiscal year 2006 and 2007.
- **Performance.** Missing from the formula is recognition of performance. Under the proposed method, tribes would be provided funding whether they met their stated objectives or not. This is unfair to tribes who continue to run efficient food programs and exceed goals and objectives.
- **Distribution of Un-obligated Funds.** Currently, there is no written plan for the distribution of un-obligated funds. Based on the absence of a plan, a tribe is not able to determine whether it would receive increased funding and at what level. Further, it is unclear how funds would be distributed should the total of tribes un-obligated requests exceed what is available.

Food Distribution Program on Indian Reservations provides an important service to the neediest members of our community. It is the Tribe's goal to improve and increase the level of service provided and this can only be achieved through increased funding. The proposed funding methodology does not appear to do this, presents many more questions, and is flawed in many respects. The Tribe is thankful for the opportunity to provide additional comment on this important issue and requests status updates on the funding methodology. If you have any questions or would like to discuss this letter in more detail, please contact Patricia Roberts, Food Distribution Director for the Menominee Indian Tribe of Wisconsin, at 715/799-5132.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Waukau". The signature is written in black ink and is positioned above the printed name and title.

Lisa Waukau,  
Chairperson

Cc: P. Roberts, Food Distribution  
Department of Administration  
File