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Governor

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March 9, 2007

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

Subject: Comment on Proposed FDPIR Funding Methodology

Dear Ms. Theodore:

The Nevada Food Distribution Program has reviewed the proposed FDPIR funding methodology. We appreciate all of the work the committee has put into developing the proposed methodology. The presentation of the materials and the explanation of how the methodology was conceived and applied was easy to understand as well. This can be a very daunting task as every ITO and State Agency operates their program uniquely to any others.

We agree with **Component 1, the Starting Basic Grant**. The \$10,000 appears to be a reasonable amount.

We also agree with **Component 2, Historical Funding**. However, more weight should be added to this component such as 10%. This component should also subtract all capital expenditures to reflect the cost of operating the program on an equal basis.

Component 3, Participation Calculation, should be considered in determining FDPIR allocations. However, being an agency that distributes by tailgate only, we do not agree that participation is the primary driver.

The Nevada Food Distribution Program operates FDPIR by tailgate distribution only. We have a central warehouse located in Reno, Nevada. We have 10 distribution sites across Nevada that we serve monthly. Some of these locations are in very remote areas that do not have many options for grocery stores. We log 1,322 miles each month on our tractor trailer rig and on our vehicle used by the program specialist.

Under the proposed funding, we feel there needs to be an allotment for tailgate distribution. This could be a lump sum or it could be calculated based upon the number of miles traveled per month. This calculation should be done prior to the participant calculation because some regions have a much higher amount of tailgate distributions. While we agree that some costs are relative to the number of participants, there are

just as many costs for tailgate distribution that remain regardless of the number of participants at each site.

Component 4, Regional Negotiated Amount, allows for special requests that may be needed specifically for each ITO/State Agency. We feel there should be guidelines set for this part. If one agency is requesting these funds for a capital expenditure and another agency needs these funds for normal operations, how does the Regional Office distribute the funds?

In summary, the new funding methodology shows the great efforts the committee put into creating a fair and equitable proposal. We look forward to reviewing the revision to the funding proposal after all comments have been evaluated.

Sincerely,

Jenelle Gimlin, Program Chief
Nevada Food Distribution Program