

South Puget Intertribal Planning Agency

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March 16, 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:

First of all, SPIPA wishes to thank the participants of the Work Group for all of their efforts to address the issue of equitability in funding the FDPIR program. As you are aware, this program is an important constant in our communities to assist families in meeting their nutritional needs and mitigating the high cost of food for low-income tribal members. Our fundamental request is that our program does not suffer any cutbacks to what we have been able to offer in the past to our rural communities. We recognize the following realities of the funding of FDPIR:

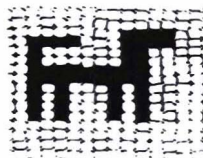
1. We have operated within the funding provided and have experienced some fluctuating participation. When there is a downward fluctuation, we lose funding even though we must maintain our program at a level of minimum staffing in order to deliver the services. Unmet needs in these instances get translated into not having adequate operational supplies and deferred maintenance on equipment. We then have to compete for carryover dollars which we find is so restricted that we have not been able to access this assistance in the past couple of years. It makes no sense to let perfectly good equipment deteriorate for lack of maintenance and then ask for replacement funding that is more likely to get funded.



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. There does not appear to be any adjustments for inflation in the funding formula - past or proposed. Staff that have been loyal and are well trained because of their longevity must be included in organizational salary/merit plans and COLA awards. Again, these increases result in the Agency being required to reduce other operational line items, ultimately negatively impacting the service delivery.

During the consultation meeting, it was mentioned several times that the tribes would not experience any decreases in funding, at least initially. However, if there is to be a redistribution of funds available the reality is that if some tribes are to be increased, others will definitely be decreased. We recognize that there still remains opportunity for shortfall recovery through the supplemental funding model of 15% of the federal appropriated amount. This still leaves no guarantees that our Agency would have access to those funds, since it is a negotiation process unsupported by guidelines.

Finally, since our program operates a tailgate program in a rural area, we do not see any accommodation for the extraordinary costs of operations in these communities. It would seem that funding tailgate operations could include a "special needs" adjustment to help defray the transportation costs involved in delivery of commodities to remote sites.

In summary, it is difficult for our agency to support this funding methodology with there being unanswered questions and unaddressed issues that could impact our service delivery negatively. However, we appreciate the opportunity to provide individual comments and hope that these thoughts will be represented in the final document.

Sincerely,



Carmen Kalama, Manager
SPIPA Food Distribution Program