



February 14, 2025

The Honorable Brooke Rollins
Secretary
U.S. Department of Agriculture
1400 Independence Ave. SW
Washington, D.C. 20250

Re: **Congratulations on your confirmation to serve as Secretary of the U.S.
Department of Agriculture**

Secretary Rollins,

As co-chairs of the Native Farm Bill Coalition (NFBC, or Coalition) and on behalf of the undersigned federally recognized Tribal governments¹ and Tribal government organizations, we want to congratulate you on being confirmed as Secretary of the U.S. Department of Agriculture (USDA).

The NFBC is a nationwide initiative to lift the voices of Tribal governments and individual Tribal producers to advance a common policy agenda. Members of the Coalition work to ensure that Indian Country's priorities are acknowledged and included in all titles of the Farm Bill, from farming and ranching to nutrition programs, rural development, forestry, and more. The NFBC is a joint project of the Shakopee Mdewakanton Sioux Community, the Intertribal Agriculture Council, the National Congress of American Indians, and the Indigenous Food and Agriculture Initiative, its official research partner.

Members of the NFBC look forward to working with you to identify ways forward for achieving our shared goals. More specifically, the NFBC would like to work with you to:

1. Identify and overcome barriers Tribal producers (including, but not limited to, ranchers, farmers, fishers, and foresters) face in accessing USDA programs by enacting a robust Farm Bill;
2. Promote greater Tribal control over USDA programs that directly serve Tribal citizens and non-Natives within Tribes' jurisdictions by fully embracing 638 Tribal Self-Determination and Self-Governance authorities (638); and
3. Correct decisions made by the prior administration that resulted in delivery disruptions to the Food Distribution Program on Indian Reservations (FDPIR) and the Commodity Supplemental

¹ Indian Entities Recognized by and Eligible To Receive Services From the United States Bureau of Indian Affairs, 89 Fed. Reg. 99899-99903 (Dec. 11, 2024), available at www.govinfo.gov/content/pkg/FR-2024-12-11/pdf/2024-29005.pdf.





Food Program (CSFP), which left many of our most vulnerable program participants without food during the summer and fall of 2024.

These priorities are described in more detail below. We hope that as you get settled in your new position, we can meet in person to further discuss these goals.

1. The NFBC looks forward to working with the USDA to encourage swift enactment of a Farm Bill.

Hundreds of Tribal governments rely on a Farm Bill to address persistent barriers to developing and growing Indian Country's agriculture sector. Today, there are nearly 80,000 Tribal producers engaged in diverse agricultural operations, including cattle, bison, specialty crops, seeds and seed oils, and traditional foods. In 2022, Tribal agriculture had \$6.5 billion in sales, nearly double the sales from 2017.

Nevertheless, Tribal producers face many challenges in growing their agricultural operations and value-added businesses. Challenges include being located in food and credit deserts, where private enterprises providing access to either simply do not exist. Further, limitations in accessing USDA programs for activities that take place on lands held in trust by the United States (and through the Department of Interior's Bureau of Indian Affairs) for the benefit of Tribal governments and their members is often a bureaucratic nightmare. It involves the coordination of processes and approvals from multiple agencies whose regulations and deadlines often do not align. In many other instances, Tribal governments lack the authority to participate in USDA programs that state and local governments have access to, putting them at a disadvantage in offering support to their local farmers, ranchers, and foresters operating on the more than 56 million acres that are governed by 574 federally recognized Tribes. Overcoming these barriers – and many more – is why members of the NFBC have been working hard to ensure that the next Farm Bill responds to the unique needs of Indian Country.

Members of the NFBC have seen progress and want it to continue. The 2018 Farm Bill included 63 provisions that positively impact Tribes and their members. These provisions promoted the use of 638 authority at the USDA for the first time, which increased Tribal control of nutrition programs to make them more responsive to the needs identified by Tribes for their citizens – the governments closest to the people served and best positioned to provide programming in the most efficient and effective manner. In the years since, those same Tribes have helped bolster regional economies by providing access to new markets for local producers. Despite this progress, members of the NFBC have voiced that more work is needed to build upon these successes.

During the 118th Congress, the House Agriculture Committee-passed Farm Bill included [46 Tribal-specific provisions](#) and the Senate Agriculture Committee Farm Bill contained more than [77 Tribal-specific provisions](#). We were disappointed that Congress was unable to enact the legislation during the 118th





Congress, but know that this new Congress is on track to make meaningful change once again. This is why we need USDA's support for enacting a Farm Bill this calendar year.

2. Promoting Tribal food sovereignty by fully embracing Tribal Self-Determination and Self-Governance authorities (638).

For more than 50 years, 638 has authorized Tribes to assume the operational responsibility and federal funding for certain programs previously administered by the federal government for the benefit of Indians. 638 has consistently proven to be the most cost-effective approach in administering federally supported programs in Indian Country. Its authority enables a practical expression of Tribal sovereignty – that Tribal governments know how to best meet the needs of their people and local communities, and how to do so efficiently. The implementation of 638 by various agencies – the DOI, the U.S. Department of Health and Human Services, the U.S. Department of Transportation, and most recently, USDA – consistently produces the biggest bang for the federal buck. As many Tribal leaders utilizing 638 across these agencies have noted over the years, they can hire local staff who live and work in their communities to manage these programs in a more cost-efficient manner than several other federal employees stationed in faraway regional or national offices.

The 2024 FDPIR warehouse disruption is a perfect example of why many Tribal governments are calling for increased control over programs that serve their citizens and eligible non-Tribal members. As you might be aware, against the advice of Tribal governments and FDPIR program administrators in early 2024, USDA consolidated the FDPIR and CSFP warehouse contractor from two vendors to one.² As a result of this consolidation, Tribal FDPIR and CSFP sites began experiencing delayed orders in June 2024, with inaccurate orders shipped and in some cases, expired or vermin-infested food delivered. The Senate Agriculture Committee highlighted the negative impact the USDA's nationalized system had on Tribes, who had little leverage over a poorly performing vendor. "More than 55,000 Tribal members depend on FDPIR to receive nutritious and wholesome food, often in remote locations where access to food is severely limited and unaffordable for low-income individuals. Similar disruptions and shortages are impacting CSFP participants across the country, and this program supports more than 719,000 seniors."³

² U.S. DEP'T OF AGRIC., Tribal Leaders Consultation Work Group (TLCWG) on FDPIR Meeting Notes (Feb. 16, 2024), available at www.usda.gov/sites/default/files/documents/february-2024-fdpiir-tlcwg-consultation-report.pdf ("Tribal Leaders expressed that the warehouse consolidation has already had negative impacts on Tribes. The Tribal Leaders advocated for a regional sourcing model. There was not sufficient time to make the transition and the warehouses are already facing goods shortages that impact tribes.")

³ Letter from the Senate Agric. Committee Chair and Ranking Member to U.S Dep't of Agric. Secretary T. Vilsack, 118th Cong. Session (Aug. 27, 2024), available at nativefarmbill.com/files/ugd/ce1214_e7448d923a224616a85718ada2d44c05.pdf.





The temporary solutions from USDA to resolve the crisis – while well-intentioned – did not result in immediate access to food for all FDPIR programs.⁴ For those Tribes unable to utilize the [limited 638 authority through the 16 pilot projects](#), the warehouse emergency did offer one significant example of the need for increased local control of this federal program. Because short-term solutions were lacking, USDA waived FDPIR’s cumbersome regulations for local purchases of food. It also allowed Tribes with existing Local Food Purchase Assistance Cooperative Agreement Program (LFPA) funds to buy locally, while also allocating more than \$10 million in emergency Commodity Credit Corporation (CCC) funds to Tribal FDPIR programs for that same purpose. While not every Tribe utilized these, the majority of Tribal FDPIR sites did. Many reported better results with deliveries and sourcing from local producers as vendors. As funds and vendor payments were reviewed by USDA, Tribal staff carried out the mission on the ground.

To adjust the breakdown that Tribal leaders had warned against, USDA committed up to \$62 million dollars to implement these solutions, when FDPIR administration usually costs a mere \$35 million annually.⁵ Surely government funds could have been better utilized by giving increased control to Tribes. USDA's embrace of 638 for programs directly serving Tribal citizens and jurisdictions would allow Tribal governments to meet needs when the federal government misses the mark.

Members on both sides of the aisle and chambers of the U.S. Congress agree. In a bipartisan letter from the House Agriculture Committee, lawmakers threatened increased oversight because of the extent of mismanagement of FDPIR and CSFP. “We...understand that regarding FDPIR, you are right to work diligently with Tribal sovereign nations first, however, we seek to improve the Department’s transparency with Congress.”⁶ The House and Senate Appropriations committees slammed USDA for failing to uphold its foundational duty to Tribes, writing that “[i]t is the federal government’s responsibility to uphold its trust and treaty obligations to Tribes, and this situation must be resolved immediately.”⁷

Then-USDA Secretary Tom Vilsack apologized to Tribal governments and promised improvements in a rare joint oversight hearing between the House Agriculture Subcommittee on Nutrition and the House

⁴ U.S. DEP’T OF AGRIC., FDPIR and CSFP Supply Chain Disruptions, available at www.fns.usda.gov/usda-foods/supply-chain-disruptions.

⁵ Transcript of the House Agric. and Approps. Subcommittees on Nutrition Hearing on Severe Food Distribution Shortages in Tribal and Elderly Communities, 79-81 (Sept. 11, 2024), available at chrg-118jhrhg56684.pdf.

⁶ Letter from the House Agric. Committee Chair and Ranking Member to U.S Dep’t of Agric. Secretary T. Vilsack, 118th Cong. Session (Aug. 23, 2024), available at x.com/HouseAgGOP/status/1827045820945866917/photo/1.

⁷ Letter from the House and Senate Approps. Committee Members to the U.S. Dep’t of Agric. Secretary T. Vilsack, 118th Cong. (Aug. 26, 2024), available at www.nativefarmbill.com/files/ugd/ce1214_b9bb101f3b8f48b1b6bef00e4e41b263.pdf.





Appropriations Subcommittee on Nutrition.⁸ Tribal witnesses called on USDA to support 638 expansion at the USDA throughout the hearing. Chairman Darrell G. Seki Sr. of the Red Lake Band of Chippewa Indians made clear, “Red Lake knows that we are not truly sovereign until we are food sovereign, and this is why we strongly support the efforts of the House Agriculture Committee to make the 638 FDPIR pilot program authorized by the 2018 Farm Bill permanent.”⁹

To ensure the successful delivery of USDA’s nutrition programs in Indian Country, we hope that you will support our efforts to make 638 a useful tool in USDA’s toolbox to improve the delivery of not only FDPIR and CSFP, but other programs serving Indian Country elsewhere throughout the agency.

3. Permanently resolving the FDPIR and CSFP warehouse disruption.

As previously mentioned, the manner in which USDA handled the 2024 FDPIR and CSFP warehouse disruption was poor from the start. The Department’s inability to resolve vendor delivery issues reported by Tribes in May, June, and July of 2024 was a source of great frustration. In late summer and fall, USDA’s direct, on-the-ground oversight of the vendor made significant headway in improving deliveries to Tribal warehouses. But we believe the Department’s waivers of burdensome regulations giving Tribes direct authority to hire local food vendors through 638 pilot projects, LFPA, and CCC were key in returning Tribal warehouse inventories to near normal by the start of 2025. Like all Americans, FDPIR and CSFP participants prefer local, fresh foods. The experiment of giving Tribes local control of these funds has been widely praised by program directors and participants alike.

Supporting the expansion of 638 at the USDA is key for many Tribes participating in these programs. Because Tribes can voluntarily opt-in to such an agreement with USDA, the authority would allow them the ability to work with the department to tailor the program to local needs. It has been a game changer for rural America in other federal departments. It would be no different in the USDA.

For other Tribes who choose to keep their programs with USDA, Tribal leaders have repeatedly asked for a more efficient, regionally designed vendor model. Sourcing regionally improves delivery times, vendor responsiveness, and potentially allows for fresh and more Tribally relevant foods in the food packages. The goal of feeding America’s most vulnerable citizens could still be met through this system. After two

⁸ House Agric. and Approps. Subcommittees on Nutrition Hearing on Severe Food Distribution Shortages in Tribal and Elderly Communities (Sept. 11, 2024), available at [“Severe Food Distribution Shortages in Tribal and Elderly Communities” | House Agriculture Committee.](#)

⁹ Testimony of Chairman Darrell G. Seki Sr. of the Red Lake Band of Chippewa Indians before the House Agric. and Approps. Subcommittees on Nutrition Hearing on Severe Food Distribution Shortages in Tribal and Elderly Communities (Sept. 11, 2024), available at [agriculture.house.gov/uploadedfiles/the_honorable_darrel_g_seki_testimony_package.pdf.](#)





national warehouse supply chain breakdowns in 10 years, Tribes believe a new paradigm is needed to improve this important feeding program.

We know we have a lot of work yet to do. We look forward to working with you in your new leadership role to enact a bipartisan Farm Bill that includes the Tribal provisions included in both of the 118th Congress Farm Bill proposals and to drive meaningful change for those who rely on USDA daily.

Sincerely,

Cole Miller
Co-Chair, Native Farm Bill Coalition
Chairman, Shakopee Mdewakanton Sioux
Community

Kari Jo Lawrence
Co-Chair, Native Farm Bill Coalition
CEO, Intertribal Agriculture Council

Undersigned by members of the Native Farm Bill Coalition

- Bear River Band of the Rohnerville Rancheria
- Big Pine Paiute Tribe of the Owens Valley
- Blackfeet Nation
- Blue Lake Rancheria
- Cabazon Band of Mission Indians
- Caddo Nation of Oklahoma
- Central Council of the Tlingit and Haida Indian Tribes of Alaska
- Cher-Ae Heights Indian Community of the Trinidad Rancheria
- Cherokee Nation
- Chickasaw Nation
- Chippewa Cree Tribe
- Choctaw Nation of Oklahoma
- Colorado River Indian Tribes
- Colusa Indian Community
- Comanche Nation
- Confederated Salish and Kootenai Tribes of the Flathead Nation
- Confederated Tribes of the Grand Ronde
- Confederated Tribes of the Umatilla Indian Reservation
- Duckwater Shoshone Tribe
- Eastern Band of Cherokee Indians
- Fallon Paiute-Shoshone Tribe
- Fond du Lac Band of Lake Superior Chippewa
- Forest County Potawatomi Community
- Fort Belknap Indian Community
- Guidiville Band of Pomo Indians
- Hoopa Valley Tribe
- Hualapai Tribe
- Iowa Tribe of Kansas and Nebraska





NATIVE FARM BILL COALITION

- Kashia Band of Pomo Indians
- Kasigluk Traditional Elders Council
- Kenaitze Indian Tribe
- Keweenaw Bay Indian Community
- Kickapoo Tribe in Kansas
- Kickapoo Tribe in Oklahoma
- Kiowa Tribe of Oklahoma
- Kootenai Tribe of Idaho
- Lac du Flambeau Band of Lake Superior Chippewa Indians
- Little Traverse Bay Bands of Odawa Indians
- Menominee Indian Tribe of Wisconsin
- Mescalero Apache Tribe
- Mille Lacs Band of Ojibwe
- Morongo Band of Mission Indians
- Muscogee (Creek) Nation
- Native Village of Noatak
- Native Village of Port Lions
- Native Village of White Mountain
- Navajo Nation
- Nez Perce Tribe
- Northern Cheyenne Tribe
- Oglala Sioux Tribe
- Oneida Nation
- Organized Village of Saxman
- Osage Nation
- Paiute Indian Tribe of Utah
- Pala Band of Mission Indians
- Pascua Yaqui Tribe
- Passamaquoddy Tribe - Pleasant Point
- Pauma Band of Mission Indians
- Pechanga Band of Luiseño Indians
- Poarch Band of Creek Indians
- Pokagon Band of Potawatomi Indians
- Ponca Tribe of Nebraska
- Potter Valley Tribe
- Prairie Island Indian Community
- Port Gamble S'Kallam Tribe
- Pueblo of Jemez
- Pueblo of Laguna
- Pueblo of Tesuque
- Pyramid Lake Paiute Tribe
- Quapaw Tribe
- Quinault Indian Nation
- Red Cliff Band of Lake Superior Chippewa
- Red Lake Band of Chippewa Indians
- Resighini Rancheria
- Rosebud Sioux Tribe
- Saint Regis Mohawk Tribe
- San Carlos Apache Tribe
- San Juan Southern Paiute Tribe
- Santo Domingo Pueblo
- Santee Sioux Nation in Nebraska
- Sault Ste. Marie Tribe of Chippewa Indians
- Scotts Valley Band of Pomo Indians
- Seneca Nation
- Shakopee Mdewakanton Sioux Community
- Shoshone-Paiute Tribes of the Duck Valley Indian Reservation
- South Fork Band of Temoke Western Shoshone
- Spirit Lake Tribe
- Summit Lake Paiute Tribe
- Suquamish Indian Tribe
- Three Affiliated Tribes of the Fort Berthold Reservation
- Village of Venetie
- Walker River Paiute Tribe
- Wampanoag Tribe of Gay Head
- White Earth Band of Chippewa Indians
- White Mountain Apache Tribe
- Winnebago Tribe of Nebraska
- Wiyot Tribe





NATIVE FARM BILL COALITION

- Yakama Nation
- Yavapai-Apache Nation
- Yerington Paiute Tribe
- Zuni Tribe of the Zuni Indian Reservation
- Affiliated Tribes of Northwest Indians
- All Pueblo Council of Governors
- American Indian Alaska Native Tourism Association
- Columbia River Intertribal Fish Commission
- Great Lakes Indian Fish & Wildlife Commission
- Intertribal Agriculture Council
- Intertribal Buffalo Council
- Intertribal Timber Council
- Kawerak, Inc. (20 communities/Native Villages)
- National Congress of American Indians (NCAI)
- National Association of FDPIR Programs (NAFDPIR)
- Native American Fish & Wildlife Society
- Northwest Indian Fisheries Commission (NWIFC)
- United South and Eastern Tribes (USET)
- Alaska Federation of Natives
- Alaska Native Health Board
- Alaska Village Initiatives
- Akiptan, Inc. Community Development Financial Institution
- American Indian Higher Education Consortium
- Bear Cub Consulting
- College of Menominee Nation
- Elderberry Wisdom Farm
- First Nations Development Institute
- Fort Berthold Allottee Land & Mineral Owners Association
- Friendship House Association of American Indians
- Four Bands Community Fund
- Hempstead Project Heart
- Ho-Chunk, Inc.
- Indigenous Hemp Farmers Cooperative
- Kamahameha Schools
- (Hoopa) Klamath Trinity Resource Conservation District
- Lakota Funds
- Makoce Agriculture Development, Inc
- Mesa Grande Business Development Corporation
- National Association of Conservation Districts (NACD) Tribal RPG
- National Caucus of Native American State Legislators
- National Indian Education Association
- National Indian Health Board
- Native American Community Development Corporation
- Native American Contractors Association
- Native American Financial Officers Association
- Nixyáawii Community Financial Services
- Northern Shores Community Development, Inc.
- Numu Allottee Association
- Oklahoma Tribal Engagement Partners (OKTEP)
- Omaha Nation Far
- Osni Ponca, LLC
- Salish Kootenai Housing Authority
- Sixth World Solutions
- South Dakota Native Homeownership Coalition
- Tatanka Funds





NATIVE FARM BILL COALITION

- Toohnii Binaneest'ą' Altaas'éeí Alliance (ToohBAA)
- Sovereign Council of Hawaiian Homestead Associations (SCHHA)
- MAZON: A Jewish Response to Hunger

