



December 11, 2020

The Honorable Joseph R. Biden, Jr.
The Honorable Kamala D. Harris
1401 Constitution Avenue, N.W.
Washington, D.C. 20270

RE: IAC Priorities - Biden-Harris Administration - Day One and First 100 Days Actions

Dear President-elect Biden and Vice-President-elect Harris:

On behalf of the Intertribal Agriculture Council (IAC) and its Native Farm Bill Coalition membership, we would like to congratulate you on your election. We look forward to working with you, your transition teams, and appointees to unleash the resilience of our agriculture producers throughout Indian Country and across all of the agriculture sector; enlisting them in the fight for a more healthy ecosystem, food system, and economy. Indian Country possesses some of the most pristine, yet fragile environments remaining in this hemisphere and it is becoming more widely realized that the solutions to climate change that are being advocated for are as old as our civilizations. Those same solutions, which will lead to feeding our own communities and our neighbors, also hold the path to regaining true self-determination and self-sufficiency.

Since its founding in 1987, the IAC has been the only organization dedicated to pursuing and promoting the conservation, development, and use of our agricultural resources for the betterment of our people, through policy development and technical assistance to Native producers. Through work with our membership, which includes all 574 federally recognized tribes, and Native agricultural producers all across the country, we have been able to analyze what works, identify what does not, and provide a roadmap through federal programs to success for many producers; but there is much left to do.

The realities of food deserts, food insecurity, and predatory interest rates, have not eliminated our capacity to produce, and it is our hope that the concepts we spell out in this document will be considered to assist in leveraging our resilience into prosperity. We have categorized our suggestions as either Day One or First 100 Days actions that this Administration can take.

Our aspirational suggestions will be communicated after the inauguration and at the start of the 117th Congress. We are heartened by the “Build Back Better” message of the transition team and offer the **First Year** solutions based on our three decades of work within the existing federal framework. We offer solutions that will enhance self-determination and economic stability for Indian Country. The policy recommendations will help the Biden-Harris Administration honor the

government-to-government relationship, support individual tribal producers, and help Indian Country build strong and healthy food economies.

Currently, the over 80,000 tribal agriculture producers across the country generate \$3.5 billion in economic activity. This activity represents a producer share of the food dollar that is historically less than 10 cents. Our recommendations aim to triple, or even quadruple that impact for Indian Country economies in the next ten years, and remove them from the dubious distinction of being among the most impoverished communities in the United States. By spurring economic growth that will contribute to the physical infrastructure necessary for this worthy task; adoption of these recommendations also provides the pathway to tribal self-determination, tribal food sovereignty, while empowering the first keepers of our ecosystems to yet again lead the way towards climate recovery.

Day One items include simple, cost effective solutions. Many of these solutions have their roots in the landmark report on Indian Agriculture, “Regaining our Future”, and will certainly empower our Tribes and their producers to contribute to the improvement of their economies. In addition to these solutions, it would be an oversight to not immediately discuss the disproportionate impacts of the COVID-19 pandemic on Indian Country ag and food systems. The painful irony of the vast amount of productive Indian land also being home to grocery stores with empty shelves as a result of the fragile, illogical, and inefficient food system we exist within, further motivates our work. It is important to note that the pandemic is exacerbating existing weaknesses in the ag and food system that already had us on the precipice of a farm financial crisis similar to the 1980’s. Very early on, we identified a slate of solutions that would help mitigate the economic impacts of the ongoing national health emergency disaster, several of which are at little to no cost to the taxpayer. Those solutions lead off our slate of recommendations.

First 100 Days items are suggestions that the key individuals selected by the Biden-Harris Administration can look to implement which will not need legislative fixes, only thoughtful leadership. Placing Indigenous people in the highest offices across the federal government and presidential cabinet, especially within the Department of the Interior and Department of Agriculture, will ensure effective deployment of these solutions, and we look forward to working closely with your appointees.

1. Supporting the Economics of Tribal Agriculture

For any strategy to be effective, it must sustain itself, and lend to growth. Unless we find a way to implement climate changing solutions through the existing streams of production income, the call to climate improving practices is drowned out for the 2 million ag producers by the call for capital out of the system. We must enlist those currently tending to our resources, the very foundation of our food system, in this cause. To effectively engage the producers we must understand that they would do it if they could! The reason they do not is simple: the extraction of capital from our food system forces ever more extraction from our soil, and results in abstract or disjointed strategies dependent on outside forces and funding, such as long-promised carbon credits, or incentive payments. Our recommendations aim to liberate the existing production

income to make producers economically whole, by shifting away from a borrowing and lending framework, to one of true investment and return on investment. The long term deployment of capital, and the economic capacity it creates, will empower producers to make those decisions with money they have created. These economic solutions are extremely practical, ready for implementation, and all move us toward an improved ag and food production system that is more respectful of our resources.

Day One

Defer Principal Payments for All Federal Borrowers, While Incentivizing Other Lenders to Offer Principal Deferrals

While the CARES Act and the U.S. Department of Agriculture (USDA) both provided some support to agriculture producers over the last several months, many more are facing increased uncertainty and risks as the pandemic continues to limit markets and slow production. Farm Service Agency (FSA) borrowers need immediate payment relief to ensure continuity of operations and access to credit, and the proposed provisions will also enable assistance to non-FSA borrowers as well. Providing relief will allow for stability in production in Indian Country and all of rural America, and further improve the sustainability and resiliency of Indian Country agriculture. The Biden-Harris Administration must take swift administrative action through the Secretary of Agriculture to:

- Immediately defer of all USDA loan principal due for the 2020 and 2021 production years, and extend all loans 2 years;
- Offer interest buy-down of 2 percent to lenders who offer principal deferrals and extensions to their borrowers; and
- Use FSA Farm Ownership loans to refinance real estate and other debt to aid in recovery from this crisis. This program has no taxpayer cost.

Taking these actions will support producers across the country by keeping their production income in their local economy, infusing over \$1 billion in deferred principal payments directly into rural and agriculture economies across the country.

This can also be done for all federal borrowers. The deferred principal model when applied across all agencies at USDA that provide loans or engage in other types of lending, serves as a zero cost localized stimulus package for borrowers. It has the added benefit of maintaining the rate of return to the taxpayer, and will continue to feed people, and preserve jobs in rural areas. It will also lead to savings that can be passed on to consumers at a time when food and service prices are at all time highs.

Empower Tribal Producers and Communities through Local Purchasing from Native Producers

Earlier this year, USDA launched a Farmers to Families food package program to support America's food producers experiencing widespread market losses. Unfortunately, the only cases where Indian farmers fed Indian families were facilitated, and paid, for by non-profits and tribes. The structure of this program, in concept, mimics a pilot program from the 2018 Farm Bill

aimed at funding such efforts in Indian Country through the Food Distribution Program on Indian Reservations (FDPIR) using 638 contracts to provide direct local and regional purchasing authority to the tribally operated nutrition program. In the Farmers to Families Program, no tribal governments or entities are distributors of food because the program specifications were not inclusive of tribal food systems. Tribal inclusion and access for any subsequent rounds of the Farmers to Families program, or similar food purchasing/distribution programs, must be addressed.

Also, the USDA can expedite and expand implementation of the pilot program for FDPIR, by funding the 112 FDPIR Indian Tribal Organizations in Indian Country currently serving over 90,000 rural people to purchase locally to fill the food packages they distribute.

First 100 Days

Modernize and Expedite the Appraisals and Mortgage Approval Processes

One of the most glaring obstacles impeding economic development through agriculture in Indian Country, to say nothing of housing and small business growth, is the appraisal and mortgage approval processes at the Department of the Interior (DOI). As the trustee for Indian trust land, nearly all transactions involving land; mortgage, sale, purchase, exchange, oftentimes even easements or rights-of-way; require an appraisal to be conducted to determine fair market value. The lack of funding and staffing to conduct these appraisals is oftentimes the undoing of months of time sensitive agriculture and economic planning. The Biden-Harris Administration must take steps to expedite and empower tribes and tribal producers in the appraisal and mortgage process, and can do so largely within the existing regulatory framework at DOI.

As an example, in the implementation of the Indian Trust Asset Reform Act of 2016 (P.L. 114-178), DOI issued a final rule in June 2017 waiving DOI's review of appraisals and valuations of Indian property. If the appraisal or valuation is done by a qualified appraiser, the tribe or individual opts out of DOI's review, and no owner of any interest in the property objects, it is approved under the rule. The Department must continue to implement this rule for all appraisals and valuations at the request of a tribe or individual. Additionally, if a tribe or individual still wishes to go through the DOI for an appraisal or valuation, DOI should expedite the process and, if the approvals are not processed within 90 days, it must be deemed approved.

This same deemed approved process must also be applied to mortgages. Mortgage approvals correctly run through the Agency or Regional Realty office, however the financial and transactional terms of the deal are also scrutinized. This creates a bottleneck that does not need to exist. If the BIA is going to provide financial review and feedback, they should be funded and staffed to do so, or they should just conduct the transactional nature of their role, approving the mortgage.

Support Additional Staffing and Fast Tracking for DOI's Division of Capital Investments

The Division of Capital Investments (DCI) at the Bureau of Indian Affairs within the Department of the Interior has been marginalized through underfunding. While it was once the first stop for reservation producers seeking assistance to cope with Credit Deserts, the DCI is now an afterthought, with little impact in the ag and food system development sector. Originally envisioned as a loan guarantee, and direct lending solution for reservation economic development, they now struggle to deploy a nominal guarantee ceiling every year. During the 1990s, banks were allowed to use this loan program to their benefit and at the expense of borrowers. This was accomplished by seeking guarantees on transactions absent the intention of seeing the loan through to maturity, and quickly calling in the guarantee rather than servicing the loan. The BIA rightfully called lenders to account, however, the lending industry banded together to sow distrust of the program. Staffing the program more fully, with Agriculture and Food System experts will help rebuild a critical source for capital. Many CDFIs currently use the DCI Loan Guarantee or Insurance products to help broaden their reach. A fast track process for approval of Treasury Certified and Emerging CDFIs in order to protect and leverage their scarce capital pools as they struggle to grow to sustainability.

2. Policy and Legal Framework for Building Back Better in Tribal Agriculture

While the federal trust and treaty responsibilities extend throughout the entire federal government and its agencies, DOI is generally regarded as the primary caretaker of this trust. The central role it takes in setting the framework for the entire federal government's approach to government-to-government relationship with tribes, if properly implemented, could be the model for the entirety of the federal government. Often a function of chronic and generationally underfunded mandates, and the inefficiencies they create, the DOI and the Bureau of Indian Affairs (BIA) in the trustee status are perceived to have created and maintained barriers to processes and policies which hamper tribal agriculture and economic development. Still others harken back to the paternalistic and anachronistic policies of the past which do not further tribal self-governance, self-determination, nor empower individuals to build the future they envision. While DOI can be a leader in this, USDA must be a partner co-leading this effort in food and agriculture. The Biden-Harris Administration has the opportunity to address these systemic injustices and promote equity and inclusion by modernizing the federal government's approach to working with Indian Country.

Day One

Trust Responsibility, Agriculture, and Native Leadership at DOI and USDA

The most important component changing the policies and approach is embracing that the federal trust relationship permeates the entirety of the federal government; it is not a one-size fits all proposition, and must have the flexibility to be responsive to the specific histories, concerns, and approaches of each tribe. The best way to uphold the trust relationship and responsibility is by institutionalizing the mechanisms to support tribally driven solutions at the Departmental level, and implementing them in a manner consistent with the intent of tribal leaders and tribal citizens.

By establishing this approach and framework on Day One, the way is paved for the necessary policy and programmatic changes at DOI, and importantly, the U.S. Department of Agriculture as proposed below, as well as other federal departments. Taking these steps will lead to historic shifts, opportunities, and investments in tribal governments and producers.

Establish and Seat the USDA Tribal Advisory Committee

The 2018 Farm Bill established a Tribal Advisory Committee (TAC) in the U.S. Department of Agriculture (USDA) to: interface between agency programs, including the DOI and BIA; advise the Secretary of Agriculture on administrative policy changes; ensure tribes and tribal producers are serviced in a timely manner; develop solutions to interdepartmental barriers; and, provide recommendations on policy issues and tribal consultation. However, due to a Presidential signing statement, it has not been implemented. Not only does the TAC mirror existing federal/tribal advisory committees, like the Tribal Treasury Advisory Committee at the U.S. Department of the Treasury, but it holds substantial potential for coordination and collaboration between tribal leaders, tribal producers, USDA, and DOI. To jump start this process and make up for the delays in implementation, USDA, working with DOI, can begin coordinating regional meetings with tribal leaders and producers, to hear exactly what is going on to best inform the work of the TAC and seat it immediately.

First 100 Days

Cross Agency MOAs and MOUs and Funding

As recently as 1990, a Memorandum of Understanding between the Agriculture and Interior Departments expressly absolved the USDA of any obligation to serve Indian Country in any meaningful way with regard to conservation on Indian Lands. DOI's underfunded statutory role to oversee trust lands and other trust assets necessitates an opposite approach. Memoranda of Agreement amongst the Departments at various levels have been executed in the past, but they fell short of meaningful implementation. This practice must go beyond just concepts and philosophies and develop true cross-agency collaborative processes and interdepartmental funding agreements, which must include, at a minimum, coordination on:

- Agriculture Resource Management Plans (ARMPs) (USDA/DOI) to strengthen their development, support additional funding, including for tribal conservation districts;
- Setting standards between BIA and Natural Resources Conservation Service (NRCS) regarding compliance, practices, and length of time for conservation practices, including the the respective approval processes for easements;
- USDA paying fair market value for archeological inspection services provided by Tribal Historic Preservation Offices;
- Applying Categorical Exemptions under the National Environmental Protection Act (NEPA) at DOI, USDA, and the U.S. Environmental Protection Agency (EPA) for all agriculture-related approvals and actions as no other farmer or rancher has to go through NEPA; and
- Apply uniform timeframes, approvals, and sign-offs for control of land at BIA to ensure that tribes and individual producers can rely on it and focus on their ag production.

Create an Agriculture Subcommittee on the White House Council on Native American Affairs and Appoint a Native Representative to the National Economic Council

Like many of our partner organizations, we are excited by the Biden-Harris Administration's commitment to reestablish the White House Tribal Nations Conference and look to leverage the White House Council on Native American Affairs. Our recommendation is to establish a specific Subcommittee on Agriculture and Food Security to ensure that food and agriculture issues can be discussed across agencies, and are integrated in the Council's full work.

Additionally, to further elevate and support the issues of economic development in Indian Country, the Biden-Harris Administration should appoint a Native representative to serve on the White House National Economic Council.

Permanently Establish and Fund the Land Buy-Back

The consolidation of individual trust land holdings into tribal ownership by virtue of the Land Buy-Back program continues to save the taxpayer money; while increasing the amount of trust land in Indian Country, supporting agriculture growth, and alleviating potential costly jurisdictional disputes that stem from land leaving trust status. In addition, over 90 percent of the land purchased under the program is in agriculture production. Consolidating trust land and reducing the number of stakeholders will stimulate ag production, economic development, and conservation practices. One of the top priorities of the Biden-Harris Administration must be to continue the Land Buy-Back Program, seeking additional funding for it in DOI's budget requests, and support additional measures to address land fractionation issues which hamper tribal jurisdiction, agriculture production, conservation, and economic development.

Address the Probate Backlog at DOI

The probate process in Indian Country can be an onerous, time consuming process as a result of it being governed by a patchwork complex of federal, tribal, and state laws. The Bureau of Indian Affairs must send every account through probate regardless of the amount, which has resulted in an extensive backlog of probate cases. Far too often the reality is that the processes are decades long. An analysis of delays in the probate process must be conducted, as this delay constitutes a breach of fiduciary duty. The Biden-Harris Administration must provide the adequate staffing and support to expedite the review of all backlogged probate cases, and establish procedures to effectively and efficiently handle probate cases moving forward so they do not put into question the status of tribal lands and assets or be a barrier to economic development.

Coronavirus Relief Fund Guidance Flexibility for Tribes to Respond to Continuing Pandemic Impacts and Issues

The Coronavirus Relief Fund (CRF) CARES Act funding has been essential for tribal and state governments to pay for expenditures related to the COVID-19 crisis. With the cases and impacts increasing, the potential for a long economic recovery, and the deadline of December 31, 2020 looming (unless Congress extends it), tribes and states need clearer guidance on and maximum flexibility in how these funds can be used. For example, in addition to paramount health care

needs, improvements in food security and food systems' infrastructure are essential to address the food shortages and lack of local and regional food markets that have increased as a result of the pandemic. Investing in agriculture and food infrastructure, like processing facilities and markets, that build local and regional food system resiliency must be recognized as accepted expenditures. The Departments of Agriculture and the Interior must work with the U.S. Department of Treasury on providing guidance and interpretations of the CARES Act CRF guidance to provide the maximum amount of flexibility so that tribal and state governments can be responsive to the specific needs of their citizens.

3. Conservation and Production Innovation

While considerable progress has been made in this regard, the smallest of policy hurdles, when amplified by a broken ag finance system, can be the death knell of innovation. Much of the methodology employed by the BIA in the oversight of trust land activity dates back to the 1950s—a time when 1,500 pound horses, and 800 pound mother cows, and excessive tillage were the norm. Current science and technology backed practices, resulting in 1,000 pound horses, and 1,400 pound cows, with no till farming and holistic grazing approaches for soil health are often stifled by these outdated policies. The process for the solution has been in place since the American Indian Agricultural Resource Management Act (AIARMA) was approved. Thoughtful implementation of existing policy with improved, long-term methodology mindful of improving and enhancing the value of the land, not just maximizing short-term returns; can be realized through tribal control of Indian land.

Day One

Address Issues with Valuation Rates and Funding Allocations

Abandon the rental rate methodology currently being used, and recognize that the single biggest comparable rental rate in Indian Country is tribal land rented by the tribal government at a set rate. The BIA currently compares apples to oranges in determining this valuation, artificially inflating the rental rate beyond the reach of cash-strapped Indian producers, putting Indian land in the hands of non-Indians, who seek to take as much forage as possible every single year without regard for soil health. By ensuring that rental rates and leasing practices favor Indian use of Indian land, a long term approach centered around soil health and local economic development can be implemented.

NRCS funding allocations are nearly as disjointed as the BIA practices. South Dakota as a positive example, allocates NRCS program dollars by the proportion of tribal land within the state. Other states, such as Nevada and Arizona take decidedly different approaches. An analysis of the most effective approach taken by State Conservationists for getting conservation dollars on Indian land is needed, and that approach needs to be adopted across the nation.

First 100 Days

Empower Production and Conservation through Supporting Agriculture Resource Management Plan Development

When Congress passed AIARMA, a visionary bill supporting tribes to develop Agriculture Resource Management Plans (ARMPs), tribes were intended to assert greater control over the development and conservation of tribal lands and enhance self-determination in agriculture. However, the extensive community focused planning component included in AIARMA has served as a financial hurdle for tribal governments. The Biden-Harris Administration must support its full implementation and fund the planning process for tribes seeking to realize its true potential for tribal agriculture and resource protection.

The DOI, coordinating with USDA, should prioritize specific funding to assist tribes (including technical assistance resources) to develop ARMPs and fund the educational opportunities under AIARMA. The collaboration between DOI and USDA is essential to supporting not only the success of the AIARMA, but also for deploying conservation practices and programs on tribal lands. The USDA should be required to accept any conservation plan or forest management plan conducted pursuant to an approved ARMP, by the NRCS, or U.S. Forest Service as equivalent to any environmental assessment deemed necessary. Guidance should be issued that such practices and plans shall receive a categorical exclusion from NEPA requirements, because they, by their very definition, improve the environment.

Finally, the creation of and implementation of an ARMP created pursuant to the AIARMA should be included as eligible for Alternative Funding Arrangements passed in the 2018 Farm Bill.

Modernize Conservation Programs and Processes, Enhance DOI and USDA Collaboration

To support a focus on healthy and productive agriculture lands, both DOI and USDA-NRCS must update their accepted conservation practices and processes. While most of the currently acceptable practices support the deployment of the conservation practices, many of the enhancements no longer apply, limiting producers ability to adapt and modernize their conservation practices to fit their needs. Standardization of GIS data across the departments is also essential to facilitate the enrollment of Indian Land in programs. In addition, a uniform system of NRCS funding allocation must be adopted that sets aside funding for tribal conservation efforts based on land-base.

Addressing Climate Change by Rethinking Ag Finance

While there is certainly a role in addressing climate change for the nearly 2 million farmers, ranchers, and producers in the country, until and unless we find a way to finance their efforts to allow the use of existing production income towards these worthy goals, we will not be able to bridge that rural-urban divide for solutions.. The reimagining of agriculture finance as investment in climate change is the most important solution we have to offer. A system of finance like the one being implemented at Akiptan, Inc., a Native Community Development Financial Institution, created by the IAC, enables producers to consider climate-based, consumer-focused solutions. There is enough capital within the food system to begin this change, if we take a longer term approach to deployment.

Too often we think of addressing climate change as a separate issue that stands alone, but it must be a part of everything we do. With the agriculture finance system by its definition providing funding to so many producers across the country, including a climate focus in agriculture finance can have one of the largest impacts and footprints on climate change.

4. Empowering Tribal Food System Development

The 2018 Farm Bill was historic for Indian Country agriculture as it included a record number of tribal-specific provisions and, for the first time, acknowledged and extended the principles of tribal self-determination and self-governance to USDA in the Food Distribution Program on Indian Reservations (FDPIR) and forestry management under the Indian Self-Determination and Education Assistance Act of 1976 (Public Law 93-638 or “638 authority”). The Biden-Harris Administration must continue the implementation of these provisions and authorities, and further tribal self-determination to allow for tribal administration of federal nutrition programs through both administrative actions and support of legislative measures.

Day One

Increase Flexibility and Tribal Administration of FDPIR and Federal Nutrition Programs

The FDPIR program is on the frontlines of providing food for families in Indian Country, including over 90,000 participants from 276 tribal governments. During the pandemic, the National Association of FDPIR has estimated a consistent 15 percent increase in usage and are anticipating additional increases as the pandemic continues. To support the FDPIR programs, the USDA must swiftly support funding increases and implementation of tribal solutions including: increasing flexibility in FDPIR administration; allowing FDPIR sites to engage in localized sourcing and purchasing of food products; and adding FDPIR to be part of the Farmers to Families program. These are simple administrative solutions the Biden-Harris Administration can take to weather the current economic storm, and lay the groundwork for future food system development. Additionally, a waiver of the administrative cost share that tribes are forced to pay in light of the economic conditions is essential.

The current prohibition against using both FDPIR and SNAP in the same month must be temporarily waived. This will allow Native households more food options at a time when it is needed the most, reduce administrative burdens on FDPIR and SNAP staff, and slow the inventory depletion at FDPIR sites. FDPIR sites are seeing increased take rates of food, because people are now taking more items within their allocation out of concern over local food availability. SNAP participants, especially those in rural areas are seeing limited availability of food, coupled with price increases. Being able to utilize both SNAP and FDPIR would ameliorate both issues in the short-term, and USDA must also support ending the prohibition permanently.

Tribal governments and their agencies do not have full access to The Emergency Food Assistance Program (TEFAP), a critical component of the federal government’s emergency food response. Donated foods for TEFAP only go to “State agencies” with recipient agencies on

distribution. With the need for establishing additional methods of accessing and distributing essential emergency foods during the COVID-19 crisis, tribal governments, as well as FDPIR Indian Tribal Organizations, must be made directly eligible for the TEFAP program.

First 100 Days

Fully Implement the FDPIR 638 Pilot Project and Request Additional Funding

The 2018 Farm Bill includes a provision creating a 638 tribal self-determination pilot program for FDPIR sites to locally procure food. Implementation of this important provision has been slowed for many reasons, including waiting for appropriations and the pandemic. The Biden-Harris Administration must ensure that its implementation continues without delay. As mentioned earlier in this letter, this pilot mirrors the Farmers to Families program and having it in place as soon as possible will not only support furthering tribal self-determination and localized purchasing, but it will also support food security and local producers as the pandemic continues on. Further, this pilot program received an initial \$3 million to start, but is authorized up to \$5 million in the 2018 Farm Bill. Since we have heard of such strong interest in this program from across Indian Country, the President's budget request for FY2022 should include at least \$5 million for the pilot program to ensure as many FDPIR sites have access to it as possible. This will not only serve more people and purchase more local foods, but it will also continue expanding out 638 self-governance in FDPIR and nutrition programs at USDA.

Support Legislative Extending Tribal Self-Governance in Federal Nutrition Programs

While this is a long-term goal that requires legislation, with the implementation of FDPIR 638 tribal self-determination pilot program, USDA must look to extend and support 638 throughout the Department and especially in all of the federal nutrition programs. With over 25 percent of American Indian and Alaska Native households receiving Supplemental Nutrition Assistance Program (SNAP) benefits, tribal governments must have the direct authority to administer SNAP. Allowing tribes to take over these functions from the federal government will improve efficiency, reduce regulatory burdens, and support tribal self-governance and self-determination. The Biden-Harris Administration must support legislation allowing tribes to administer SNAP as the discussion around the 2023 Farm Bill will begin early in 2021.

Schedule a Tribal Consultation with the FDPIR Tribal Leaders Consultation Work Group

Since 2016, the USDA Food and Nutrition Service has been holding tribal consultations on FDPIR with the FDPIR Tribal Leaders Consultation Work Group several times a year. These consultations create the government-to-government discussions needed to solve the historical, current, and immediate issues facing the FDPIR. The successes achieved through these consultations have made positive changes to support the FDPIR program managers and tribal citizens recipients, and it should be upheld as a model for tribal consultation to be implemented across all of the USDA agencies. To ensure that these important meetings continue, especially at this critical time, we ask that the Biden-Harris Administration schedule and host a tribal consultation with the FDPIR Tribal Leaders Consultation Work Group within the first 100 days.

5. Professional Development and Building the Next Generation of Tribal Agriculture

The most important investment we can make over the next four years is to invest in our Native youth and the next generation of agriculture producers in Indian Country. Our youth are the key to building our agriculture economies and addressing the climate crisis we are facing. The IAC, recognizing that we must build a future for the generations to come with our youth at the table, supported the creation of a completely youth-led organization to sit alongside the IAC: the Native Youth Food Sovereignty Alliance (NYFSA). The NYFSA membership votes and appoints a Native youth leader to sit as a full voting member on the IAC's Board of Directors, ensuring that our youth not only have a voice in the IAC's work, but help direct its future. We urge the Biden-Harris Administration to support youth-related initiatives, programs, scholarships, and educational opportunities.

First 100 Days

Fund the AIARMA Scholarship Program and Increase the Funding for FRTEP

A very important part of AIARMA is the professional scholarships were to be supported to be implemented and funded in resource and agriculture management. However, in 27 years, these scholarships have never been funded. A generation of young agriculture professionals in Indian Country have lost the opportunities. Additionally, the Federally Recognized Tribes Extension Program's (FRTEP) tribal reservation level extension agents, who are charged with the important work of inspiring reservation youth in agriculture, lead a tenuous existence, are in perpetually jeopardy of losing their programs as others are considered for funding. While FRTEP was created in 1990 and appropriated \$3 million, it has never seen an increase in appropriations in 30 years. These funding inequities must be addressed in order to empower the next generations of agriculture producers and resource professionals. We call on the Biden-Harris Administration to, for the first time, provide funding for the AIARMA professional scholarship program at DOI, as well as support increasing the funding for FRTEP at USDA.

Thank you for your consideration of our top priorities for Day One and the First 100 Days. If you have any questions, please do not hesitate to reach myself or Colby Duren, the IAC Director of Policy and Government Relations at: colby@indianag.org; 860-324-2391. We look forward to working with the Biden-Harris Administration to Build Back Better in Indian Country.

Sincerely,



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