

USDA Equity Commission

Public Meeting #2: Written Comments

The following questions/comments were submitted April 22, 2022 – May 26, 2022 in response to the [Federal Register Notice](#) for the second Public Meeting of the Equity Commission held on May 10-11, 2022. The comments have been categorized into three groups: Questions, Comments, and Resources. Within each group, comments are sorted first by date and then alphabetically by last name. All attachments provided are included and categorized at the end of the document.

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Questions

1. EP F

Received by Email: 5/3/22

Hello,

I have attempted to get assistance from your New Mexico office and haven't really had any luck. They all say that the equity program is new but don't really try to help. I am curious to see how this program works if the same people that would gatekeep access to funding for groups that have historically been discriminated against are the same ones expected to help us all of a sudden without any oversight and consequence for inaction.

We live in a minority-majority state, which also creates a separate issue that should be addressed but you won't be able to effectively see this unless there is a separate outside department that we can contact or that actively monitors if these employees are really implementing the new initiatives.

I would like to know what resources and changes have been made that we can educate ourselves on to be better self-advocate. Also, if there is an ombudsman or some way of getting help, we would appreciate that as well.

Thank you for your time

2. James Kubla

Received by Email: 5/5/22

I'm not sure what social equity means? Can Underserved beginning Producers growing produce and Hemp qualify for these programs?

Comments

3. [Teresa Corinaldi](#)

Received by Email: 4/21/22

My name is Teresa Corinaldi. I am an educator by profession. I was so pleased to read your statement acknowledging that you are committed to rooting out systematic racism in our country. As I am sure you are well aware one of the areas in which systematic racism exist is in many Urban and rural areas where there are food deserts.

Currently I am in talks with the Community College of Philadelphia, Career Link and local politicians to create what I call The Family Dinner Program. The Family Dinner Program is geared to help working families with wholesome dinners prepared by student through Community College of Philadelphia's Culinary Arts Program and then distributed to Childcare Center, School and recreation centers across the City for families.

The reasoning for this is due to the fact that in today's workplace both parents must work to meet the financial obligations of their household. Though women are in the workplace in greater numbers now more than ever women are still the main persons responsible for preparing meals, lunch and getting children ready for the next day. This challenge is even greater for single mothers and those who cannot afford a personal Nanny.

The Family Dinner Program would allow families to obtain a low-cost wholesome dinner for their children several times per week. The real systematic racism is the destruction of families. What most people who talk about solving the problem of racism do not realize is that if people are able to have families, feed them properly in a safe and clean environment because they can make a living wage everyone benefits. Companies that produce goods and services benefit because people are able to afford those things, it increases the economy. I am wiring to ask for a meeting to look at how food can be supplied to Community College of Philadelphia so that their Culinary Arts Students can obtain training in their craft and at the same time provide dinners to families who need them due to time, energy or lack of availability of food access.

4. [Jean Public](#)

Received by Email: 4/23/22

I do not support the equity commission at all. it should be shut down. there is no reason to focus on this when so many people of all different races are achieving much better lives in America than they could achieve anywhere else. there is not needed for this fat cat bureaucracy. this comment is for the public record.

5. [Jean Public](#)

Received by Email: 4/24/22

there should be no "equity" commission which is a figment in joe Biden's senile head. it should be an equality commission where those who want to get ahead have to work to do so. you don't just get it handed to you for nothing for the color of your skin. That is what joe bide is all about. taxing everybody so he can give out prizes based on the color of somebody's skins. that is not what our constitution is

about at all. you work for it. that is the basis of what has to happen. this agency needs to be shut down. Joe Biden needs to be impeached out of office. he is not working constitutionally at all. this is his mistake and misuse. this comment is for the public record.

6. Joseph James

Received by Email: 5/10/22

Dear Commission Members:

I am a black farmer and climate-tech entrepreneur, who has invented innovative processes, which cost-effectively combat Climate Change, promote Environmental Justice, and create new bio-economy jobs, in communities of color, making bio-products.

Using my patented Combined Remediation Biomass and Bio-Product Production (CRBBP) Process, one plants and then multi-tasks fast and large-growing Bio-Crops, to cost-effectively do good things, like capturing large amounts of CO 2, remediating air, soil and water, and then making bio-products from the harvested material, in which the captured carbon is sequestered.

I informed you, on March 15th, that the USDA breached a Cooperative Research and Development Agreement (CRADA), into which they had invited me, concerning one of my bio-products.

This breach is not only damaging my company, financially, but also limiting my ability to engage black farmers, heir property owners and communities of color, in a new bioeconomy, using the very process, which the USDA should have patented, under the CRADA.

Time is of the essence, so, having heard her talk, this morning, I ask that you refer this matter to Katherine Ferguson, USDA Chief of Staff, and ask her to quickly arrange a hearing.

As you might recall, one of the key recommendations I made, on March 15th was to: Create a sense of urgency and procedures, within USDA, so that farmers and entrepreneurs of color, adversely impacted by the USDA don't go out of business, or die, before their matters are reviewed and resolved.

And I ask staff, to again, share my March 15th comments and attachments with you, and the Chief of Staff, so that you will both have preliminary details.

I look forward to your, and the USDA Chief of Staff's, most timely action.

Regards,

JJJ

[Attachment: CRBBP Process US Patent No. 10,086,417 Issued 10_2_18 (1)]

[Attachment: SC Black Farmers Coalition_ATP's CRBBP Process Benefits]

7. Anna Johnson

Policy Manager, Center for Rural Affairs

Received by Email: 5/24/22

Hello Ms. Hernandez and members of the USDA Equity Commission,

I'm writing in response to the Federal Register Notice from April 22, 2022, requesting public comment be submitted to the USDA Equity Commission in relation to the public meetings held on May 10-11, 2022.

My organization, the Center for Rural Affairs, is headquartered in Nebraska and I am writing to submit comments on behalf of our work with Latino producers in Nebraska. Please see attached our letter with comments. If you have any questions about any of this content, please let me know.

Thank you for this opportunity.

Anna Johnson

[Attachment: Central for Rural Affairs USDA Equity Commission comment 2022 May]

8. DeShawn L. Blanding

Policy and Strategy Specialist, Rural Coalition

Received by Email: 5/25/22

Greetings,

Attached are Rural Coalition's public comments following the USDA Equity Commission Meeting on May 10-11, 2022. Please let us know if you have any questions.

With gratitude,
DeShawn

[Attachment: RC Equity Commission Comments 5.25.2022]

9. Eriberto Fernandez

Government Affairs Deputy Director, UFW Foundation

Received by Email: 5/26/22

The UFW Foundation submits this comment to support the letter submitted on July 15, 2021, Docket ID: USDA-2021-0006 (see attached) and emphasize some additional points.

USDA must provide adequate language accommodations and better visual communication to farm workers and non-English speakers on all their services, websites, and programs.

Approximately 2.4 million farmworkers labor in our nation's U.S. farms and ranches, cultivating and harvesting crops and raising and tending to livestock. A majority of these 2.4 million farmworkers do not speak English and are most comfortable speaking Spanish or other indigenous languages like Mixteco, Zapotec, or Triqui. Because of the language barrier, millions of farmworkers are denied the opportunity

to participate in USDA programs. They lack the skills to understand and read the many programs USDA offers because some sites are only in English. To ensure that farmworkers are fully taking advantage of the service and opportunities USDA can offer, language and communication material must be tailored to their language needs.

USDA must address food insecurity and food desserts in farmworker and rural communities

One in nine people in the U.S. struggle with hunger. Farmworkers, in particular, are exposed to higher levels of food insecurity than any other groups. In a 2020 study, 45% of Latino farmworkers in California’s Central Valley reported having a lack of food.

USDA must include farm workers in their policies, practices, and grant awards.

President Biden [signed an executive order](#) establishing a task force “dedicated to mobilizing the federal government’s policies, programs, and practices to empower workers to organize and successfully bargain with their employers.” Being one of the largest federal agencies that buys goods and services, USDA should leverage its considerable procurement programs, policies, and practices to empower farmworkers to organize and successfully bargain with their employers. By supporting employers that adopt strong workplace protections for farmworkers. For example, grants for specialty crops should only be awarded to growers with high labor standards and collective bargaining agreements.

[Attachment: FJ UFWF Racial Equity Comment to USDA]

Resources

10. Nicole Olson

Indian Land Tenure Foundation

Received by Email: 5/6/22

Comment

Please see the attached letter and documents.

[Attachment: Hernandez LtR 05062022]

[Attachment: FRTEP_Indian CountryExtensionCommissionRecs_Final]

[Attachment: FRTEP_Indian CountryExtensionCommissionRecs_Summary_Final]

ATTACHMENTS

The following attachments were provided by members as a part of written comments.

1. [Joseph James](#): CRBBP Process US Patent No. 10,086,417 Issued 10_2_18 (1)
2. [Joseph James](#): SC Black Farmers Coalition_ATP's CRBBP Process Benefits
3. [Anna Johnson](#): Central for Rural Affairs USDA Equity Commission comment 2022 May
4. [DeShawn L. Blanding](#): RC Equity Commission Comments 5.25.2022
5. [Eriberto Fernandez](#): FJ UFWF Racial Equity Comment to USDA
6. [Nicole Olson](#): Hernandez Ltr 05062022
7. [Nicole Olson](#): FRTEP_Indian CountryExtensionCommissionRecs_Final
8. [Nicole Olson](#): FRTEP_Indian CountryExtensionCommissionRecs_Summary_Final



US010086417B2

(12) **United States Patent**
James

(10) **Patent No.:** **US 10,086,417 B2**

(45) **Date of Patent:** **Oct. 2, 2018**

(54) **COMBINED REMEDIATION BIOMASS AND BIO-PRODUCT PRODUCTION PROCESS**

(71) Applicant: **Agri-Tech Producers, LLC**, Columbia, SC (US)

(72) Inventor: **Joseph J. James**, Charleston, SC (US)

(73) Assignee: **Agri-Tech Producers, LLC**, Columbia, SC (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.

(21) Appl. No.: **15/308,908**

(22) PCT Filed: **May 5, 2015**

(86) PCT No.: **PCT/US2015/029182**

§ 371 (c)(1),
(2) Date: **Nov. 4, 2016**

(87) PCT Pub. No.: **WO2015/171570**

PCT Pub. Date: **Nov. 12, 2015**

(65) **Prior Publication Data**

US 2017/0072442 A1 Mar. 16, 2017

Related U.S. Application Data

(60) Provisional application No. 61/988,632, filed on May 5, 2014.

(51) **Int. Cl.**
B09C 1/00 (2006.01)
B09C 1/10 (2006.01)

(Continued)

(52) **U.S. Cl.**
CPC **B09C 1/00** (2013.01); **A01B 79/00** (2013.01); **B09C 1/105** (2013.01); **C05D 9/00** (2013.01);

(Continued)

(58) **Field of Classification Search**

CPC B09C 1/00; B09C 1/105; B09C 2101/00
See application file for complete search history.

(56) **References Cited**

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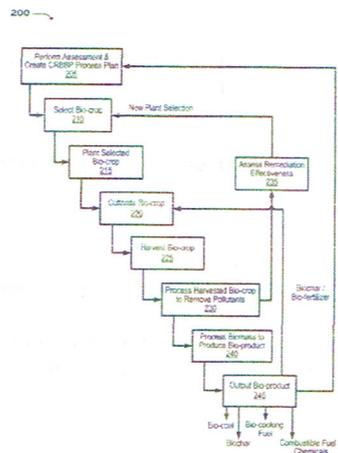
Science, Ethanol Can Contribute to Energy and Environmental Goals, 2006, vol. 311 No. 5760, pp. 506-507.

Primary Examiner — Frederick L Lagman
(74) *Attorney, Agent, or Firm* — Jeffrey T. Stover; Haynsworth Sinkler Boyd, P.A.

(57) **ABSTRACT**

A method, for mitigating an environmental condition, may include assessing a geographic area with which the environmental condition is associated; and creating a plan to mitigate the environmental condition. The plan may identify a bio-crop for mitigating the environmental condition and a bio-product to be produced from the bio-crop. The method may also include planting the bio-crop in soil that is located within the geographical area. The bio-crop may be planted in a manner that enables the environmental condition to be mitigated. The method may further include harvesting the bio-crop based on planting the bio-crop; processing the harvested bio-crop to obtain biomass; producing the bio-product based on the biomass; and outputting the bio-product based on producing the bio-product.

16 Claims, 8 Drawing Sheets



Agri-Tech Producers, LLC (ATP)

*The **Existential Threats** of **Climate Change** present both the world's greatest challenge, **BUT**, if handled well, one of its **BIGGEST** economic, social and environmental justice opportunities, for **Black Farmers and Communities, EVER!***

A Presentation To The SC Black Farmers Coalition 2022 Annual Meeting

By: Joe James, President, Agri-Tech Producers, LLC (ATP)
(803) 413-6801 - josephjames@bellsouth.net

ATP's Leadership



**Joe James, ATP's
Founder & President**

- **A former, 33-year economic development professional,**
- **A 2008 Purpose Prize winner, for his work, using innovative ag-related concepts to uplift folks of color,**
- **Served a 6-year term, as a Secretarial appointee, on the Federal Biomass R&D Technical Advisory Committee,**
- **Invented and patented his CRBBP Process, and invented and licensed innovative Biomass Carbonization Processes.**

Challenges: Local, National & Global

Climate Change. Cost-effective, **CO₂** capture, as well as **Carbon** re-use and sequestration mechanisms are needed .

Other Environmental Challenges. Cost-effective ways to combat the many other **Environmental Challenges** facing air, soil and water are needed.

Health Challenges. Ways to reduce the high levels of **Airborne Particulate Matter (PM_{2.5})**, to both prevent **respiratory disease** as well as to reduce the severity of **COVID-19 illness and death**, in at-risk communities, are needed.

Solution: ATP's Patented Combined Remediation Biomass and Bio-Product Production (CRBBP) Process

Using our patented **CRBBP Process**, we plant and multi-task special **Bio-Crops** to capture **CO²**, and simultaneously remediate **contaminated** air, soil and water, **less expensively**.

We then harvest the **Bio-Crops** and convert the resulting **Biomass**, containing the **Captured Carbon**, into cost-advantaged, **Circular-Economy Bio-Products**, which never need to become waste.

Biomass Sorghum: Grows Fast & Big, in 6 Months, Capturing 7 Tons of CO²/Acre!



Standard Sorghum



Biomass Sorghum

Biomass Sorghum Captures Nearly 4 Times The CO² As Trees, Per Acre!!!

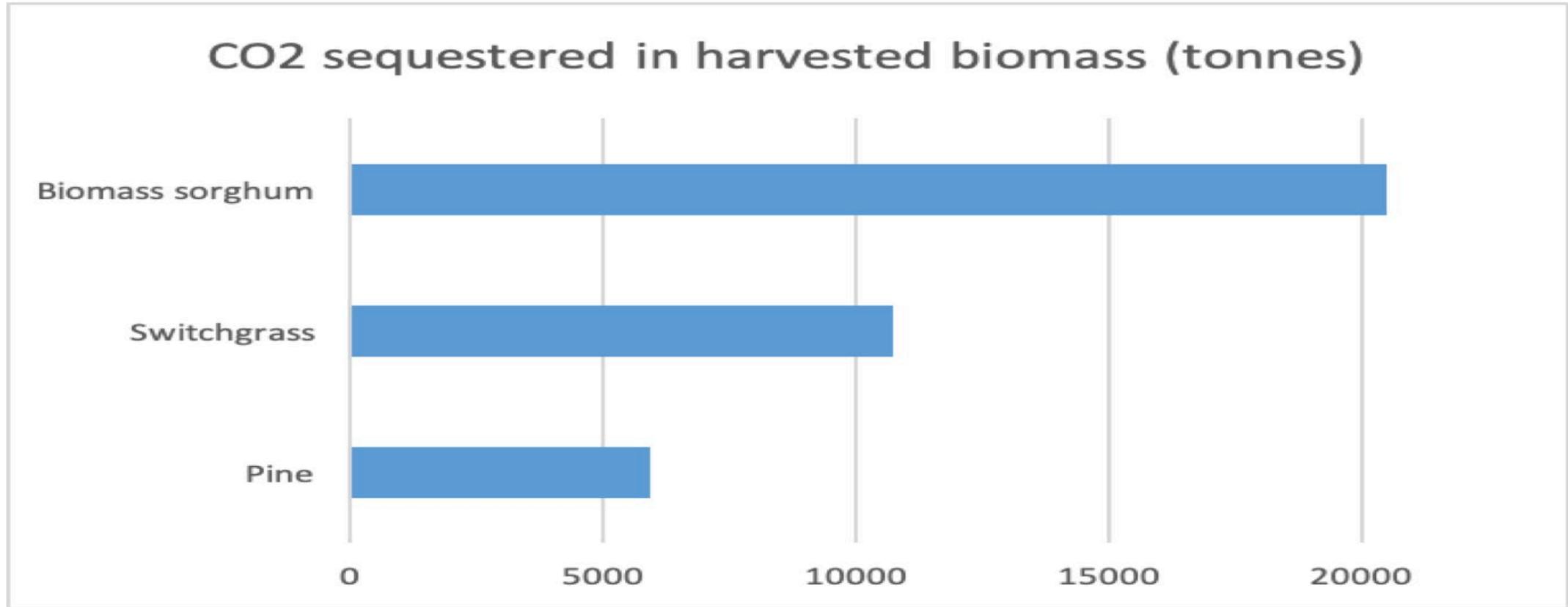


Figure 2. Relative amounts of CO₂ captured over 15-year period from 100-acre plot of forage sorghum, switchgrass, and pine. Credit: Dr. Daniel Sanchez, University of California-Berkeley.

CRBBP Process: Key Steps

Overcome Environmental Challenges, Then Make Bio-Products

Plant Bio-Crops



Harvest/Shred
Bio-Crops



Make
Bio-Products



Convert Biomass Into:

- 1. Filler Powders***
- 2. Poultry House Bedding**
- 3. Biochar***

* Using Our Proprietary Carbonization Processes

ATP's **CRBBP Process** Benefits **Black Farmers & Rural & Urban Communities of Color**

- Creates A **New Source** of Farmer **Revenues**
- Reinvigorates **Underperforming** Rural Wastewater Treatment Plant **Spray Fields**
- Remediates **Polluted** Air, Land & Water
- Promotes **Environmental Justice**
- Protects **Health**
- Produces **Cost-Competitive Bio-Products**
- Creates A **Bio-Economy** in South Carolina
- Creates New **Jobs** Making **Bio-Products**

We Can “Fix” Underperforming Rural Wastewater Treatment Plant “Spray Fields”



Biomass Sorghum: Creates Great Pollinator Habitat, Where Planted



As it remediates vacant city lots, the **CRBBP Process** will capture **CO²** and, also screen out **Airborne Particulate Matter (PM 2.5)**.



It will do the same, as it remediates **Brownfields**, **Coal Ash Sites**, or Extracts **Excess Nutrients** from Watershed Farm Soils.



ATP Then Converts the Resulting Biomass Into “Circular Economy” Bio-Products



Vs

Linear economy



ATP's Bio-Product Markets

Superior Bio-Based Filler Powders: The \$380 billion US plastics and composites market (Tires, too!!!)

Superior Poultry House Bedding: The \$48.3 billion US poultry market, while converting the resulting litter into...

Nutrient-Rich Biochar Soil Amendments: The \$8 billion US home and garden care market (Potting Soil)

Plant-Based Bio-Coal: The \$780 billion, global coal market is seeking biomass co-fire fuels, to combat Climate Change

ATP's Key Milestones

- We have successfully demonstrated the ability of our **CRBBP Process** to extract excess **Nitrogen** and **Phosphorus** from Maryland's Chesapeake Bay watershed farm soils, to protect the Bay.
- We have successfully demonstrated the efficacy of our **Cost-Advantaged Bio-Products**.
- Our Maryland operating affiliate was selected, by the **Exelon Foundation's Climate Change Investment Initiative**, to commercialize an urban application of our **CRBBP Process**, in Baltimore, Maryland. Our Virginia operating affiliate is collaborating with **Dominion Energy**, to grow our crops on, and bury our **Biochar** in their sites, to generate **Carbon Credits**, and our Pennsylvania operating affiliate has just started a similar project with Philadelphia Gas Works.

Agri-Tech Producers, LLC (ATP)

*The **Existential Threats** of **Climate Change** present both the world's greatest challenge, **BUT**, if handled well, one of its biggest economic, social and environmental justice opportunities, for **Black Farmers and Communities, EVER!***

A Presentation To The SC Black Farmers Coalition 2022 Annual Meeting

By: Joe James, President, Agri-Tech Producers, LLC (ATP)
(803) 413-6801 - josephjames@bellsouth.net



May 24, 2022

United States Department of Agriculture
Cecilia Hernandez, Designated Federal Officer
USDA Equity Commission
Office of the Deputy Secretary
1400 Independence Avenue SW, Room 6006-S
Washington DC 20250-0235

Attn: *Federal Register* Notice requesting comments, Vol. 87 No. 78, Friday, April 22, 2022

Re: Center for Rural Affairs comments

Ms. Hernandez and members of the USDA Equity Commission,

The Center for Rural Affairs is a private non-profit organization that works to promote rural opportunity. We engage people in decisions that affect their community and the quality of their lives. This work includes working with many Latino farmers and ranchers in Nebraska, supporting them in accessing USDA programs.

From our work with Latino producers, we have identified a number of areas where USDA policy change could increase support and access for Latino producers in Nebraska, and offer the following recommendations where USDA can improve outreach to the Commission for consideration.

- 1) **Translate press releases before releasing to USDA staff and the media, particularly signup deadline announcements.** This will help ensure that producers with Limited English Proficiency have access to the same information about programs as everyone else. When signup deadlines are announced first in English and then weeks later in other languages, producers with Limited English Proficiency are at a disadvantage in accessing USDA services.
- 2) **Offer flexible service center office hours to accommodate producers who cannot meet during business hours.** Many of the Latino farmers we work with also have jobs that prevent them from meeting with USDA service center staff during business hours.

Requiring service center staff to offer flexible office hours will increase access to USDA programs.

- 3) **Translate FSA enrollment forms and supporting information.** Only some forms are available in Spanish. To ensure ease of enrollment for underserved producers, all paperwork and forms should be translated.
- 4) **Clarify that documentation of past agricultural experience in foreign countries is acceptable for qualifying as a beginning farmer when applying to FSA loan programs.** Many of the Latino farmers we work with are interested in applying for USDA loan programs. These programs require demonstration of three years of farming experience to prove eligibility. Many immigrants have agricultural experience in their home countries, but USDA policy on whether this agricultural experience counts towards their eligibility for these programs is not widely known or understood. We recommend that USDA develop a clear, widely accessible policy indicating a non-exhaustive list of the types of documentation of past agricultural experience in other countries that individuals can bring to demonstrate eligibility for USDA programs. Such documentation could include sales and purchase records, affidavits from farm owners, educational certificates, class transcripts, business ownership or management records, and/or affidavits from neighbors or relatives with knowledge of the operation.
- 5) **Require state offices to create a list of reliable interpreters who can assist producers in understanding USDA services and programs and communicate with USDA service center staff.** The currently available interpretation hotline is cumbersome, and skilled interpreters are needed to successfully explain USDA services and programs and support relationship development with service center staff.
- 6) **Develop an advisory council or task force within USDA to offer recommendations on further increasing USDA's capacity to reach producers with Limited English Proficiency.** This council should include producers, organizational representatives from many cultures, and bi-lingual USDA staff. Such a council should offer USDA a report with guidelines for USDA within 12 months, and then continue to meet to oversee USDA's progress.
- 7) **Offer cooperative agreement opportunities for third-party organizations to begin or continue outreach and education to underserved producers.** Non-profit organizations with existing relationships to underserved producers may be better equipped to offer USDA 101 training and individual support to producers on various

USDA programs. Cooperative agreements would provide the needed capacity for such organizations to provide this education and support.

Thank you for your consideration.

A handwritten signature in black ink that reads "Anna Johnson". The signature is written in a cursive style with a long horizontal flourish at the end of the name.

Anna Johnson

Policy Manager, Center for Rural Affairs



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For further information contact:

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May 25, 2022

USDA Equity Commission
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

RE: Public Comments following the USDA Equity Commission Meeting on May 10-11, 2022

Dear Equity Commission:

Born of the civil rights and anti-poverty rural movements, Rural Coalition/Coalición Rural (RC) has served as a voice of African-American, American Indian, Asian-American, Euro-American and Latino farmers, farmworkers, and rural communities in the US, as well as indigenous and campesino groups in Mexico and beyond for over 40 years. We work to assure that the voice of our over 50 diverse member organizations from all regions, ethnic and racial groups and genders have the opportunity to work in solidarity on the issues that affect us all. We appreciate the opportunity to provide the following comments expressing the difficulties within USDA systems and programs that compound inequities for Black, Indigenous, and other people of color (BIPOC) farmers and ranchers.

Farm Production

Base Acres and Yields - The Equity Commission should recommend remedies to address the continuing inequities in the allocation of base acres which result permanently in reduced disaster and program payments for socially disadvantaged and small-scale producers. The most immediate remedy producers recommend would be to allow all producers to choose to use the county averages as the basis for these payments.

Staffing of USDA Service Centers Serving Farmers and Ranchers - RC received reports from producers in Florida and Puerto Rico about the understaffing and centralization of staff in one or

two locations, office closures, compounded by lack of outreach, inadequate broadband access, and out-of-date information on websites result in a lack of farmers' awareness of where offices are and service or program availability. The NRCS office in Puerto Rico moved to a more distant location from rural farmers. The Equity Commission should review the adequacy of staffing of local offices for programs serving farmers and ranchers and recommend actions to assure adequate service, including adequate funding.

Credit and Land Access - Producers we serve continue to report difficulties in access to credit and land, and particularly, issues related to conflicts of interest that arise in the lending process. This may include a very close association between county office staff making credit decisions with appraisers and others involved in the process, and especially in the process of loan servicing. County staff who are also members of the local community have knowledge of which producers are facing financial hardships. Outside parties including appraisers may have interest in acquiring the property the farmer has. There are also examples of county office staff or county committee members acquiring properties lost by producers. The Equity Commission should assure conflict of interest policies with penalties are in place and make the Department aware of any needs for statutory change to ensure fairness in lending.

Access to Debt Relief - Additional assistance is urgently needed to help BIPOC producers affected by the pandemic. BIPOC farmers are awaiting debt relief, attempting to resolve heirs' property issues, or burdened by other encumbrances to clear title to their farm and forest land should be considered a top priority for the Commission. The Commission should actively create recommendations that: (1) support the continuation and increased funding for the Heirs' Property Relending Program (HPRP), (2) Immediate funding and implementation of the Tenure, Ownership, and Transition of Agricultural Land (TOTAL) survey to provide baseline data on the numbers of properties that are held in undivided interests (particularly at time so many families have lost members during the pandemic who passed on without wills and succession plans) or absentee ownership ; and (3) and continued efforts to press Congress to deliver the debt forgiveness historically underserved borrowers, especially those in economic distress.

County Committees and Conflicts of Interest - County committees were created to provide local leadership and oversight for farm programs and to provide outreach from farmers to other producers in their communities. The Equity Commission should review the degree to which these committees accomplish those functions and recommend metrics for accountability. One measure of the degree to which they accomplish outreach is in the participation in voting for county committee members. FSA should again release statistics on the number of producers eligible to run and vote in the county committee elections in each county, and the number who actually vote. In addition, all farmers eligible for programs, rather than all farmers who participate in programs, should be eligible to run for and vote in county committee elections, which may require a statutory change. FSA and NRCs should also examine in each county the maximum number of programs in which any producer participates, the median number of programs, and also the demographics of participation in the programs. There should also be stronger conflict of interest policies.

USDA Awards for Outreach and Technical Assistance - USDA is at present making more Technical Assistance Awards faster and in more useful amounts than ever before, which is a very necessary welcome change. In particular, awards of scale that allow groups to collaborate in outreach and are of particular import.

We recommend that the Equity Commission work for more equity and consistency among various USDA agencies in the process of making awards and in the level of technical assistance provided and oversight required. The process of making awards and of requiring reports is the most straightforward at present with respect to the National Institute of Food and Agriculture. The business center instituted in the new Farm Programs and Conservation Service under the previous administration has a much more intensive and more laborious process than the more accessible one NRCS had in place before that. Other programs have different degrees of difficulty especially for groups new to the process. All programs and all recipients must be prepared to meet all federal requirements for grants and agreements. However, it is also important that agencies not impose additional and unnecessary requirements. Such requirements may interfere with the ability of grant recipients to devote the attention they need to apply to carrying out the goals of the grant and achieving and reporting strong results and outcomes. The Equity Commission would do well to examine the variations in the requirements among different agencies and recommend systems that are most effective and appropriate to achieving results that produce more equity.

There are also issues at the local level with the administration of the awards. For example, one of our members in Alabama noted that under their NRCS outreach award, NRCS requires the District Conservatist (DC) to sign-off on all meetings with farmers in the area, which becomes complicated for the farmer when making a return visit. The farmer has to go through the DC to reconfirm and approve their visit, which is an onerous and cumbersome process for the producer. The DC should instead look at the reports and bring forth problems that arise instead of needing to seek or give approval for every individual visit. All related challenges were exacerbated when a local office is assigned a new District Conservationist.

Increase Support of Socially Disadvantaged Producers - Socially disadvantaged producers, especially those with operations on lands that have not been improved for long periods, due to a perennial lack of access to disaster assistance, programs and credit, have a greater, most urgent need to access conservation practices and should be prioritized. One RC farm leader described, “being treated as a second-class citizen...If you’ve got more land, you rank higher, and white people own the majority of the land.” Equitable outreach is critical to making all farmers aware of current priorities and opportunities and creating equitable opportunities for farmers to employ conservation practices should be re-established as a priority for the agency. The Equity Commission should make specific recommendations on how NRCS could increase the level of set-asides for socially disadvantaged groups, and the manner in which these are allocated, with the express intention of which is to address historical inequity by reducing competition within a pool of larger, better-resourced farmers. More money should be allocated to set-asides, and the percentage (or amount) needs to be raised to reflect a reasonable minimum payment that makes the process worthwhile to the farmer and to both NRCS and FSA. A number of eligible farmers who reported to us on accessing the CFAP II process, for instance, stated that after navigating a newly-created, complex application process, they received as little as ten dollars based on the formulas used in that program.

Rural Development and Infrastructure

Our members have reported that the lack of participation in rural programs stems from two factors (1) lack of awareness, outreach, and education, and (2) distrust in the government caused by experienced and perceived discrimination and prejudice.

In a May 2022 focused group discussion, Rural Coalition asked representative leaders of rural communities about whether and why race/ethnicity demographic data should be included in the Climate Environmental Justice tool to identify disadvantaged communities. They responded by recounting examples of federally-funded initiatives that failed to address the needs of the most vulnerable households. In one project to replace lead-piping in a rural district with antiquated housing throughout, funds were expended before reaching the most distressed households of the community, yet utilities rates were raised for all households. This recollection was validated by others reporting related outcomes of infrastructure improvement projects in other parts of the county. When funds to create (equitable) access to municipal water systems, pave “red clay” roads, and provide rural broadband were meted out by population size or other demographics not accounting for race/ethnicity, the formula used for allocation did not account for accumulated neglect, disadvantage, or equitable inclusion in state/county/local decision-making structures. Among those confirming this tendency, a member from North Carolina reported that redirecting water from swamps and other natural waterways in BIPOC communities to other municipalities and limiting water use is resulting in drying out the swamp and killing trees.

One RC member organization in Oklahoma reported the lack of outreach from rural development during the recent infrastructure rollout, which is problematic when rural development is not a well-known entity to many residents and farmers. Further, while USDA Rural Development and other USDA agencies have the engineers and staff to evaluate and determine the costs of the projects, but Black communities in Oklahoma were not “at the table” to participate in the pilot projects to develop these capacities. It is noteworthy that the Section 502 Direct Loan Program for single family housing repairs and assistance is one of the most “popular” Rural Development programs in these communities. The loan payment is an affordable option for low-income households in these persistently poor counties. Nevertheless, rural BIPOC residents are reluctant to apply to USDA programs because of distrust in the federal government caused by their experiences of long-standing systemic discrimination and racial prejudice. It is vitally important to invest more in equipping community-based organizations in rural areas to provide the outreach, education, and technical assistance rural residents need to navigate these programs.

Broadband Access - To date, many rural communities lack the infrastructure to access consistent broadband networks. Though rural broadband inaccessibility is a universal problem, when examined according to disparities by race and ethnicity, the disparities increase. Rural broadband inaccessibility is drastically disproportionate for rural communities of color compared to majority-white communities. Despite outreach to local providers, many communities of color are still not receiving improved, or even adequate service.

Infrastructure Investments - Infrastructure investments are inequitably dispersed across rural areas. Wealthy, often majority white, areas in rural towns are often the first to receive infrastructure development projects, leaving behind impoverished areas most in need of investments and development. By the time investments get to underserved households, funds are insufficient to fulfill the demand.

Equity in Data Collection and Documentation - As a measure of equitable service provision, USDA should compare measures of demographically-proportional program participation to the demographics of the county as a whole. This also would substantiate the rationale for ensuring that local offices consistently document and improve their documentation, always including the demographics of who is being served.

Overall, we urge the Commission to create recommendations and pursue actions that address the lack of awareness and the (historically justified and verifiable) distrust that historic inequities perpetuate to the detriment of BIPOC farmers and ranchers. USDA should increase partnerships with community-based organizations with proven experience serving these farmers to conduct outreach efforts and campaigns on the programs USDA has to offer.

Cooperatively,

Rural Coalition

The Rural Coalition, born of the civil rights, indigenous rights, and anti-poverty rural movements, has worked since 1978 to assure that diverse organizations from all regions, ethnic and racial groups, women and men, and youth and elders, have the opportunity to work in solidarity on the issues that affect them all. The foundation of this work is strong local, regional and national organizations that work to assure the representation and involvement of every sector of this diverse fabric of rural peoples.



July 15, 2021

Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Submitted via Regulations.gov

RE: Identifying Barriers in USDA Programs and Services; Advancing Racial Justice and Equity and Support for Underserved Communities at USDA
(Docket ID: USDA-2021-0006)

Dear Secretary Vilsack,

Farmworker Justice and the United Farm Workers Foundation submit these comments in response to USDA's request for input on how it can advance racial justice and equity for underserved communities ("the Request").

Farmworker Justice (FJ), founded in 1981, is a national organization that advocates on behalf of farmworkers who perform agricultural work in the United States, as well as their families. FJ seeks to empower farmworkers to improve their living and working conditions, immigration status, occupational safety and health, and access to health care. The United Farm Workers Foundation (UFW Foundation) is a dynamic nonprofit organization established in 2006 whose core purpose is to empower communities to ensure human dignity. With offices and staff across Arizona, California, Georgia, Washington, and Michigan, the UFW Foundation operates in some of the nation's leading agricultural areas, serving over 100,000 farmworkers annually, providing critical services and engaging its members and constituents in systemic change to break the cycle of poverty.

We applaud the Administration's commitment, set forth in Executive Order 13985, to addressing the entrenched disparities in our laws and public policies, as well as our public and private institutions, that have denied equal opportunity to underserved individuals and communities. We

write to emphasize that, for USDA, such a commitment requires a focus on the challenges and concerns of the roughly 2.4 million farmworkers who labor on our nation’s farms and ranches.

I. Farmworkers are a Historically Underserved Community

The Department’s Request recognizes that too many American communities have been systematically denied a full opportunity to participate in aspects of the nation’s economic, social, and civic life. It lists several groups that have faced such adversity: “Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.” Almost every farmworker in the country falls into at least one—if not more—of these underserved categories, and in many cases, their status as agricultural workers exacerbates other existing patterns of discrimination.

The history of agricultural labor in the United States is a history of racism, beginning with the era of slavery and persisting to this day. For example, the racism that pervaded the agricultural sector during the Jim Crow era remains enshrined in our modern labor laws. During the “New Deal” period of labor reforms in the 1930s, President Roosevelt and his allies obtained the support of southern congressmen by excluding farmworkers and domestic workers from key labor protections.¹ Members of Congress at the time were explicit that they did not believe Black people deserved the same wage protections as white people.² The exclusion of farmworkers from key labor protections was wrong then, when most farmworkers were Black, and it is wrong now, when an estimated four out of every five farmworkers are Hispanic/Latino.³

Many farmworkers also experience serious harms because of our country’s broken immigration system. More than three-quarters of farmworkers are immigrants, mostly people of color from Mexico as well as other nations. More than half are undocumented or here on precarious temporary work visas. Without permanent legal status, these workers are vulnerable to employer exploitation and abuse. Every time an undocumented worker bravely chooses to speak up about dangerous conditions or unfair treatment, she risks retaliation in the form of deportation. The ever-present threat to “call ICE” is a powerful tool to keep workers silent, even in the face of

¹ Lindner, Marc, *Farm Workers and the Fair Labor Standards Act: Racial Discrimination in the New Deal*, 65 TEX. L. REV. 1335, 1336 (1987). See also Perea, J. F., *Echoes of slavery: Recognizing the racist origins of the agricultural and domestic worker exclusion from the National Labor Relations Act*, 72 OHIO ST. L.J. 95 (2010).

² Sean Farhang and Ira Katznelson, “The Southern Imposition: Congress and Labor in the New Deal and Fair Deal,” *Studies in American Political Development*, vol. 19 (Spring 2005), p. 14 (quoting Florida Congressman James Mark Wilcox’s comments in the debate over FLSA: “[T]here is another matter of great importance in the South, and that is the problem of our Negro labor. There has always been a difference in the wage scale of white and colored labor. . . . You cannot put the Negro and the white man on the same basis and get away with it.”).

³ U.S. Dep’t of Labor, Research Report No. 13, Findings from the National Agricultural Workers Survey (NAWS) 2015-2016: A Demographic and Employment Profile of United States Farmworkers (2018), p. 2, https://www.dol.gov/sites/dolgov/files/ETA/naws/pdfs/NAWS_Research_Report_13.pdf.

untenable circumstances. And when workers do challenge unfair practices, they generally find that they have little recourse. For the most part, the federally funded legal aid programs which have been designated to provide legal services to indigent farmworkers are prohibited from representing undocumented immigrants.

It is no coincidence that the denial of equal labor protections in agriculture and the infliction of harm on agricultural workers through our nation's broken immigration system affect a population that is predominantly people of color. The discrimination in these policies and the institutions that implement them is due in part to racism.

As in generations past, today's farmworkers experience high rates of unemployment and persistent poverty. According to the DOL's National Agricultural Workers Survey, farmworkers' mean and median personal incomes during the 2015-2016 period were between \$17,500 and \$19,999, with the mean and median total family income between \$20,000 and \$24,999.⁴ Approximately one-third of farmworkers report family incomes below the poverty line.⁵ As a result of their poverty, many farmworkers live in substandard homes in crowded conditions.⁶ Further, many farmworkers experience food insecurity, unable to access or afford the fruits and vegetables they harvest. And despite living in poverty, many farmworkers' immigration status denies them access to benefits that can support their health and well-being, such as SNAP or Medicaid.

Mortality among agricultural workers due to climate change is yet another indicator of socioeconomic and health disparities in agriculture. The Centers for Disease Control and Prevention (CDC) indicate that compared to all other civilian occupations, **crop workers are 20 times more likely to die of heat-related causes, and the majority of these deaths occur among immigrant workers.**⁷ Given the nature of agricultural work, farm workers are on the frontlines of exposure to extreme temperatures and wildfires, and they lack refuge from the elements. This year, as temperatures rose to well over 100 degrees in the West and the Plains, the recommendations of state and local officials to stay indoors and seek climate-controlled spaces stood in sharp contrast with the reality of farmworkers, who were performing strenuous work under scorching temperatures. Moreover, some farmworkers are paid for what they produce, not by hour. These piece rate wages create a perverse incentive for workers to push the body beyond what it is meant to endure, as taking necessary breaks for water or rest means lost income.

⁴ U.S. Department of Labor, *Findings from the National Agricultural Workers Survey (NAWS) 2015-2016*; published January 2018. Available at https://www.dol.gov/sites/dolgov/files/ETA/naws/pdfs/NAWS_Research_Report_13.pdf.

⁵ *Id.*

⁶ Melissa Gomez, 'We Can't Prevent It': Farmworkers Paid Low Wages Fear Coronavirus Spread in Crowded Housing, Los Angeles Times (June 9, 2020), <https://www.latimes.com/california/story/2020-06-09/salinas-covonavirus-monterey-county>.

⁷ Centers for Disease Control and Prevention, *Heat-Related Deaths Among Crop Workers – United States, 1992-2006*, <https://www.cdc.gov/mmwr/preview/mmwrhtml/mm5724a1.htm>.

The COVID-19 pandemic further demonstrated how persistent inequalities have devastating effects on farmworker communities. Workers were often forced to continue working, shoulder to shoulder, without proper personal protective equipment or access to sufficient handwashing stations. Many workers were afraid to get tested. They feared that immigration enforcement might be at the testing site⁸ or that if they tested positive they could lose their jobs and would no longer be able to feed their families.⁹ Due to lack of health insurance or sick leave benefits from their employers, few could afford to take a day off to access health care or COVID-19 treatment.¹⁰ These barriers continue to impede COVID-19 vaccination efforts in farmworker communities.

As government-designated essential workers, farmworkers had no choice but to show up to work each day, even when they felt sick or feared they might have been exposed to COVID-19. An estimated 597,000 agricultural workers have contracted COVID-19.¹¹ A recent UCSF study found that food and agriculture workers in California have experienced the highest “excess mortality” during the pandemic, with a 39% increase in mortality compared to past years. Among Latino food and agriculture workers, that mortality increase reached 59%.¹² Even for those who survived the initial illness, COVID-19 can cause permanent disability or long-term health problems that require ongoing medical care.¹³ The agricultural sector would not survive without these workers. They deserve better.

II. USDA Must Act to Advance Equity for Farmworkers

For years, USDA has failed to treat farmworkers as constituents to be respected, heard and served. Indeed, USDA’s key “Mission Area,” of “Farm Production and Conservation” focuses on its promises “for the nation’s farmers and ranchers and other stewards of private agricultural

⁸ Jacqueline Alemany, *Power Up: Policymakers Concerned That Immigrants Avoiding Coronavirus Testing and Care*, WASHINGTON POST (May 27, 2020),

<https://www.washingtonpost.com/news/powerpost/paloma/powerup/2020/05/27/powerup-policymakers-concerned-that-immigrants-avoiding-coronavirus-testing-and-care/5ecd7842602ff165d3e41a05/>.

⁹ Arun Gupta & Michelle Fawcett, *Undocumented Farmworkers Are Refusing Covid Tests for Fear of Losing Their Jobs*, WORKDAY MINNESOTA (June 22, 2020) <https://workdayminnesota.org/undocumented-farmworkers-are-refusing-covid-tests-for-fear-of-losing-their-jobs/>.

¹⁰ NAWS report, at 10. (Finding that only 47% of farmworkers reported that they had health insurance. Cost is the most common barrier to health care reported by farmworkers.)

¹¹ Jayson L. Lusk, Ranveer Chandra, *Purdue Food and Agriculture Vulnerability Index*, Purdue University, College of Agriculture, <https://ag.purdue.edu/agecon/Pages/FoodandAgVulnerabilityIndex.aspx> (reporting 597,000 agricultural worker COVID-19 cases as of July 7, 2021).

¹² Yea-Hung Chen et al., *Excess Mortality Associated with the COVID-19 Pandemic Among Californians 18-65 Years of Age, by Occupational Sector and Occupation* (2021), <https://www.medrxiv.org/content/10.1101/2021.01.21.21250266v1.full.pdf>.

¹³ Tae Chung et al., *COVID ‘Long Haulers’: Long-Term Effects of COVID-19*, Johns Hopkins University (2021), <https://www.hopkinsmedicine.org/health/conditions-and-diseases/coronavirus/covid-long-haulers-long-term-effects-of-covid19>.

lands,” but does not once mention the farmworkers without whom those farms and ranches would be unable to function. USDA has a responsibility to use its programs, resources and purchasing power in a way that improves living and working conditions for farmworkers, respects the human dignity of farmworkers, and rewards agricultural employers who treat their workers well.

The most important step that USDA can take toward farmworker equity is to recognize farmworkers as equal stakeholders in its programs. The fact that farmworkers are not traditionally among the parties submitting applications and requests directly to the Department does not diminish the influence that the Department’s policies and programs have over their lives. For example, workers themselves do not apply for farmworker housing grants and loans administered by USDA Rural Assistance division, but they have an enormous stake in how those funds are distributed and the housing conditions that result. Similarly, grant and procurement policies directing USDA funding to farms and ranches have a tremendous impact on the farmworkers working on those farms, particularly when those funds empower employers with a history of worker abuse.

We have long advocated for USDA to improve its outreach to farmworker communities to incorporate their concerns and viewpoints in USDA decision-making and provide access to Department resources. The existing USDA infrastructure for farmers and farmer organizations allows farmers’ voices to be heard on a range of issues and includes channels for Department to provide funding, training and other resources for farmers. The USDA’s commitment to infrastructure for farming must also extend to farmworkers and their membership organizations as well as other organizations that serve farmworkers. Even when the commitment exists, it can be difficult to reach farmworkers due to their geographic isolation, lack of internet service, limited transportation, low literacy, and fear of utilizing government services. Special efforts are required to reach farmworkers.

USDA should undertake this outreach in a variety of ways. First, the Department should create specific grant programs directed toward farmworker-serving organizations to provide education and services to farmworker communities. Second, USDA should ensure that the position of Farmworker Coordinator, established by Congress, is filled and that the office has the resources necessary to fulfill its statutory mandate to consult with farmworkers and the community-based nonprofit organizations who serve them. The Farmworker Coordinator should be empowered to weigh in with Department leadership on any major USDA action that would impact farmworkers. Finally, the Department should recognize that the most important improvements in policies and programs affecting farmworkers have occurred because of farmworkers acting through their farm labor unions. The Department should collaborate extensively with farm labor unions and other associations of workers, just as it collaborates with unions and associations of farmers.

There is a severe lack of data regarding farmworkers and their living and working conditions. USDA plays an important role in filling this gap through its data collection, including estimates of the number of farmworkers in its Census of Agriculture and information about wages nationwide through the Farm Labor Survey (FLS). This data is critically important, but must be improved upon. In order to better serve farmworkers, USDA must strengthen its efforts to gather reliable data about farmworkers at the national, state and local levels.

The FLS, for example, provides critical information about farm labor personnel, wages, and working hours, but it needs improvement. The survey is central to setting the annual Adverse Effect Wage Rates (AEWRs) for employers that use the H-2A agricultural guestworker program. Without it, employers could offer substandard wage rates that deter U.S. farmworkers from applying for jobs, reduce their earnings, and allow employers to hire foreign citizens on temporary work visas at below-market rates. Indeed, when USDA suspended the FLS in 2020, the United Farm Workers and UFW Foundation—with Farmworker Justice and WilmerHale as counsel—successfully sued to have the FLS reinstated, thus preventing harm to workers whose wages would have suffered. USDA must take steps to protect and improve the FLS, including by issuing regulations to mandate an annual FLS that measures the wages paid to farmworkers. Farmworkers also should be provided with a meaningful opportunity to improve the quality of the survey to ensure that policymakers, advocates, and farmworkers themselves have access to the best, most accurate data possible.

USDA has a unique understanding of the threat that climate change, including rising temperatures and wildfires, poses to agriculture and the nation. Consistent with the recommendations of the White House Environmental Justice Advisory Council to the Administration, USDA must leverage its resources and discretion to ensure that agricultural employers, “including those that benefit from federal government procurement, have a heat illness prevention plan in place that at a minimum includes training, access to potable and cool water, shade, paid rest breaks, and protocols for emergency response.”¹⁴ As workers in the fields are increasingly exposed to harmful, smoke-filled air amid raging wildfires, USDA and its U.S. Forest Service should also work with farmworker organizations to ensure that agricultural workers are adequately informed about the risks of wildfires and protected from their dangers.

Informed by this outreach, other concrete actions that USDA could take to respond to the needs of farmworker communities include:

¹⁴ White House Environmental Justice Advisory Council, *Final Recommendations: Justice40, Climate and Economic Justice Screening Tool, & Executive Order 12898 Revisions*, p. 29, <https://www.epa.gov/sites/production/files/2021-05/documents/whiteh2.pdf>.

- Prioritize programs, policies, funding and research that address the needs, conditions, and aspirations of farmworkers.
- Ensure that farmworkers and their organizations receive funding to help address the COVID pandemic and the devastating impact it has had on farmworkers and their communities.
- Coordinate with other relevant agencies such as EPA, OSHA, and HHS to address the health risks that environmental factors like pesticides, heat stress, and wildfires pose to farmworkers and their families.
- Adopt procurement policies and practices that incentivize better working and living conditions for farmworkers.
- Support legislation that seeks to reform our broken immigration system by providing farmworkers a path to citizenship.
- Support legislation that ends discrimination against farmworkers by ensuring they have equal access to labor protections, and support regulatory policies and actions that implement wage, occupational safety and other protections.
- Support legislation which guarantees farmworkers' right to engage in collective bargaining.
- Support worker-centered corporate social responsibility projects and promote employers that adopt strong workplace protections and provide farmworkers with a voice at work.

As USDA seeks to transform its approach to vulnerable communities in the agricultural sector, it cannot leave behind the farmworkers who labor on our farms and ranches. It is past time for USDA to recognize farmworkers as the essential stakeholders that they are, responding to their concerns and ensuring that agency programs do not benefit employers at workers' expense.

Sincerely,

Farmworker Justice
United Farm Workers Foundation



Cecilia Hernandez
cecilia.hernandez@usda.gov

Dear Ms. Hernandez;

We write this as a follow up to memos sent to Secretary Vilsack on October 13, 2021 and April 27, 2022 regarding the inequities surrounding the Federally Recognized Tribal Extension Program (FRTEP).

We seek a conversation, in person or virtually, with both the Equity Commission and its Agriculture Subcommittee to explain this difficult equity problem and to bring solutions to correct a long-standing USDA discriminatory practice.

Please share the attached easy-to-read documents with the USDA Equity Commission and Agricultural Subcommittee of the Commission. These documents are the result of the Indian Country Extension Commission's (ICEC) efforts to formulate a realistic plan of action based on a modified Smith-Lever formula specific to Tribal Extension and similar to County Extension programs. In short, we are asking for a \$30 million increase for the FRTEP program that: (1) eliminates the current competitive requirement and (2) provides permanent base funding through this modified formula. This recommended increase will bring the number of agents from 35 to 125 over a few years.

Ultimately Indian Country needs your help moving these solutions forward on the Hill and in the upcoming Farm Bill. This inequity is a persistent and possibly illegal oversight on the part of USDA.

The 1990 Farm Bill attempted to reduce some of this inequity by establishing the Extension Indian Reservation Program (EIRP—now the

Federally Recognized Tribal Extension Program, FRTEP) and funding about 20 offices on reservations. The program has grown to about 36 offices now—funded by 100% short-term grant money and a budget that has been essentially flat since 1990 – and reaching only 4% of Indian Country as compared to 97% of US counties being served by county Cooperative Extension. The agricultural potential of the roughly 58 million acres in Indian Country is severely limited – primarily due to this historical lack of access to agricultural education and research provided by Cooperative Extension.

The attached documents lay out solutions to this glaring inequity by: (1) Causing the funding stream to Indian Country Extension to look like that which funds County Extension programs. This would eliminate the current requirement for Tribal Extension offices to compete against one another for base funding; and (2) Adding resources to build out the program to provide Cooperative Extension services to more tribes and reservations.

Thank you for thoughtful consideration of the solutions we bring before this committee. We look forward to continuing this conversation that can finally bring equity to Tribal Nations.

Sincerely,

Indian Country Extension Commission Co-Chair

Joseph G. Hiller, Ph.D. (Oglala)
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Scottsbluff, NE 69361

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Indian Country Extension Commission

Indian Country Extension Development under the Revised
Federally Recognized Tribal Extension Program

Executive Summary



EXECUTIVE SUMMARY

ICEC Findings and Proposed Solutions

Fundamental Ask:

We are requesting a \$49 million increase in Tribal Extension funding with continuous funding at this level after an initial 4-year program build-up. We request a **\$30 million increase for the FRTEP programs** and a **\$19 million increase for 1994** Extension programs.

Key Solutions:

Eliminate the competitive requirement for FRTEP funding and provide permanent base funding that utilizes a funding formula similar to County Extension programs. Current FRTEP programs need to be grandfathered in and receive increased funding to \$140,000 per year. The new FRTEP positions are to be allocated based on the funding formula described on page 9 of the complete Commission report.

Increase funding for both the FRTEP and 1994 Extension programs to make them equivalent to County Extension programs across the nation. The recommended increase in allocations of \$30 million for FRTEP will bring the base number of agents up to a solid foundation of 125. The recommended \$19 million increase in allocation to the 1994s is needed to enhance their outreach and programming efforts. Both increases need to be incorporated into base funding requests starting in year 5 after the initial 4-year \$49M increased funding is expended. Note that the funding path of each program is separate and should not be seen as a single funding line. Both are critical and need to be supported.

This ask is grounded in the **principal purpose** for Extension – to create economic opportunity and enhance community development through education that helps Tribal community members make healthier lifestyle choices. The result is less dependence on dialysis, food distribution programs and a host of other government-funded benefits. (See Tribal member testimonials at end of document).

Cost savings resulting from this investment will be significant but, most importantly, Tribal Nations will be empowered with a sustainable program that vastly improves the quality of life in their communities.

Modified Smith-Lever Formula specific to Tribal Extension:

A \$30 million increase for the FRTEP program through an initial 4-year investment with continued funding of the existing 35 programs at an increased level of \$140,000. Over this 4-year investment period 90 new agent positions (for a total of the 125) and 27 new specialist positions will be added across Indian Country. Approximately 56% (\$16.9M) will be expended in the first two years with the remaining 44% (\$13.1M) expended in the last two years. All allocations are to be based on the recommended USDA Modified Smith-Lever formula Specific to Tribal Extension:

1. Equity
2. Land Base
3. Tribal Population
4. Per Capita Income
5. Current Indian Country Extension Support

Why this is a Critical Need:

1. FRTEP's inadequate funding has not kept up with inflation. The initial requested funding of \$10 million was to serve 239 Tribes, but in 1991 FRTEP received just \$1 million for 15 positions (see complete Commission report). Thirty years later the program has only increased to \$3M, funding 35 programs serving 32 Tribes. If the original \$10 million had been allocated and increased at the same rate as the \$1 million start-up fund, the program would have had a \$618 million investment instead of the \$72 million over the past 30 years. **This equates to a missed investment of \$546 million** not accounting for inflation.
2. The FRTEP and 1994 programs combined **currently reach less than 10%** of the 574 eligible Federally Recognized Tribes. The need for services from Tribal Nations vastly exceeds the current available and limited resources.
3. FRTEP and 1994 programs, despite their erratic and uncertain year-to-year funding, have performed mightily, **accomplishing significant and measurable results.**

What do Tribal Members say about the impact of FRTEP in their communities?

- "I love all the opportunities it [Extension] provides for children to start learning about accountability, responsibility, about being a good role model and a good productive community member... You really see a difference in our youth."
- "If it wasn't for [the agent] I don't know what my life would be like... [S]he took me everywhere. I'm visiting with elders and stuff, and I love the elders [who] I have learnt from... I'm not going to forget the things they have taught me throughout the years and so that I can pass them on to the next generation."
- "What's been most helpful is that the Extension office here serves as a resource to people of all ages in our community. They provide us with a lot of knowledge. It's very specific to our community, so it fits our needs whether its 4-H, livestock, or agriculture."
- "[Extension is] super consistent, [the agent] would meet with us... gave us a timeline...helped us design and put up a high tunnel, which I built with my students. Without Extension...we wouldn't have the gardening and our kids wouldn't have had these experiences and these memories."
- "It makes a big difference to have a Native person with so much knowledge, passion and mastery of the programs delivered. Because she is a community member, a tribal member, and lives here, she understands."
- "As deadly as that virus was, they [Extension] still provided services, they still provided programming, they still provided opportunities and they never let that get in the way of everyday life because we still have to get through all that... We are really grateful for that."

Imagine the incredible benefits that could have been achieved if the FRTEP program had been **funded as originally intended** and not limited to so few Tribes.

The Commission's request aims to address and – more importantly – **make up for years of lost impact that has resulted from chronic underfunding** while mending and – most importantly – **ending discriminatory practices** through a funding formula that directly **addresses barriers to equity for Tribal Nations.**



“I think that’s really important that the FRTEP program is creating healthy relationships within our families, within our community. There’s a lot of hardships in the community so it’s really nice to have those happy moments to look forward to.”

Trent Teegerstrom

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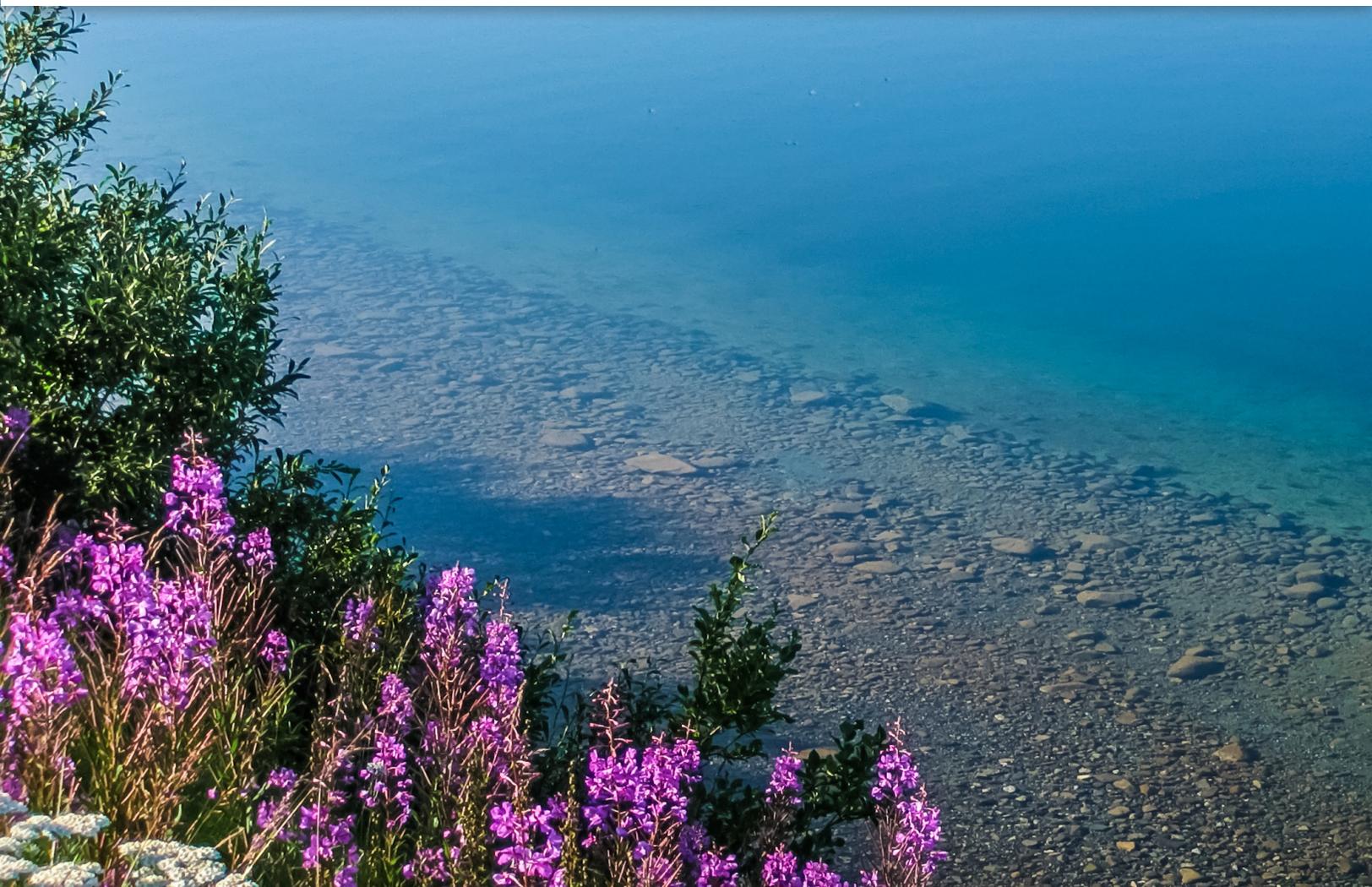
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Indian Country Extension Commission
Indian Country Extension Development under the Revised
Federally Recognized Tribal Extension Program





“I love all the opportunities it provides for children to start learning about accountability, responsibility about being a good role model and a good productive community member... You really see a difference in our youth.”



SUMMARY OF FINDINGS

Summary of ICEC findings and proposed solutions

The Indian Country Extension Commission (ICEC) was formed in January 2022 to assess the current state of Indian Country Extension (ICE). The work of ICEC focused on two programs; The Federally Recognized Tribal Extension Program (FRTEP) and the Tribal Colleges Extension Grant Program, commonly known as “1994 Extension.” These programs pursue Congressionally articulated priorities including advancing plant health and production and plant products; animal health and production and animal products; food safety, nutrition, and health; bioenergy, natural resources, and environment; agriculture systems and technology; and agriculture economics and rural communities. Additionally, they pursue current articulated priorities of the United States Department of Agriculture (USDA), including creating climate-smart agriculture and forestry; improving nutrition security; building new and better markets; building the workforce for the future; and ensuring diversity, equity, inclusion, and accessibility.

Bottom line up front:

We are requesting a \$49 million increase in Tribal Extension funding with continuous funding after the initial 4 years of program build up. The \$30 million increase to the FRTEP programs will increase the total number of FRTEP agents: 90 new agents added to the current 35, as well as the addition of 27 new regional specialists with expertise in areas such as water, range, animal science, forestry, youth, Native foods, and Native languages. The regional specialists are needed to engage Tribes not served by either FRTEP agents or 1994 Extension programs. The \$19 million increase for 1994 Extension will enhance and expand their outreach and programming efforts.

ICEC is composed of 17 volunteers with expertise in Native American agriculture, cultural relevance, and extension services delivery. The members and their affiliations are at Exhibit 1.

Summary of ICEC findings:

1. FRTEP is an impactful program limited only by its past and current erratic and uncertain funding.
2. FRTEP started almost 100 years after the County-based Extension programs were established.
3. FRTEP and 1994s funding began at a minimal level.
4. FRTEP’s inadequate funding has not kept up with inflation. The initial requested funding of \$10 million was to serve 239 Tribes, but in 1991 only received \$1.0 million for 15 positions (see appendix table 4). Thirty years later the program has only increased to \$3 million, funding 35 positions serving 32 Tribes. If the original \$10 million had been allocated and increased at the same rate as the \$1 million start-up fund, the program would have had a \$618 million investment instead of the \$72 million over the past 30 years. This equates to a missed investment of \$544 million not accounting for inflation. The lack of growth in the funding and number of agents is the core issue in the ability of FRTEP programs to meet the increased demand for services.

5. Because the bulk of FRTEP and 1994 workers' salaries are supported by the scant federal funds, Tribal Extension programs have difficulty attracting and retaining staff.
6. FRTEP and 1994 programs now reach about 75 of the 574 eligible Federally Recognized Tribes, or approximately 13%. The demand for services from Tribal Nations vastly exceeds the current available resources.
7. The competitive funding is static for FRTEP and the 1994s. As new programs compete and are added, all existing programs in Tribal Nations suffer from further reduced funding. This type of competitive funding is not found in County Extension programs.
8. FRTEP and 1994 programs, despite their erratic and uncertain year-to-year funding, have performed mightily, accomplishing significant and measurable results.

Proposed Solutions: The proposed solutions put forth by ICEC will place these FRTEP and 1994 programs on par with non-Tribal (County) Extension programs and provide an equitable and non-discriminatory path forward. It will be critical that assurances are in place with the Extension directors to keep the flow of funds to the Tribal Extension projects that they support.

- Eliminate the competitive nature of the FRTEP funding and instead use permanent funding similar to County Extension programs. The current 35 FRTEP positions are to be grandfathered in and increased to \$140,000 level per year. The new FRTEP positions are to be allocated based on the formula described on page 9 for all phases.
- Increase funding for both the FRTEP and the 1994 Extension programs to quickly make them equivalent to the non-Tribal Extension programs across the nation. Note that the funding path of each program is separate and should not be seen as a single funding line. Both are critical and need to be supported. The recommended increase in allocations of \$30 million for FRTEP will bring the base number of agents up to a solid foundation of 125. The recommendation of a \$19 million increase in allocation to the 1994s is needed to enhance their outreach and programming efforts. Both increases need to be incorporated into base funding requests starting in year 5 after the initial 4-year \$49M increased funding is expended.
- Increase access to additional programs and reduce or remove the matching requirements on all USDA grants for Tribal Extension.
- Provide flexibility in how program funds can be used in project resources and activities to allow each Tribal agent to meet the continually changing needs of the Tribal communities.



PART 1:

Funding Mechanism for Indian Country Extension

As a result of the first Indian Country Extension Commission meeting via Zoom, several tasks were assigned with findings to be presented to the Commission at the next meeting. This brief memo is intended to provide an outline for follow-on thinking and planning.

One explicit task of the Commission required an estimate of the desired end goal – including the estimated size, geographic scope, and national budget for a new and expanded Federally Recognized Tribal Extension program to increase Tribal Extension agents across the country.

It should be noted that establishing a new Extension office in a Tribal community is demanding work, and results take time just like the first Extension programs in counties over a hundred years ago. This includes an administrative commitment for both the leadership and management of Indian Country Extension programs and the development of a mutual partnership between the land grant institutions and Tribal Nations where the positions are to be located. Most importantly, the overarching purpose for the expansion of this program is to help Tribal Nations to optimally achieve their goals. This means that the Tribes will determine which land-grant institutions can provide the best service, especially where there may be the need for multi-state participation and collaboration. Accordingly, we recommend the budget to support an expanded and flexible program to meet the changing needs of Tribal communities in the future which would be considerate of the following:

1. **Start-up costs.** Funding allocations to launch initial programming, staffing, equipping new offices. Start-up funding should be available for a period of three years.
2. **Office considerations:** It is common that office space for Indian Country Extension may not meet the institutions' standards for occupancy. Tribal offices vary widely but become well-known and host impressive numbers of visitors and educational activities. It is important that negotiations address this need when determining office space.
3. **Phased-in program growth with five proposed phases over a period of 4 years.** The following budget estimate shows year-by-year amounts, including both increasing existing budgets as well as funding new office start-up budgets.
4. **Establishment of operating MOAs with Tribes,** including reimbursement for the costs incurred by the land grant institution and the Tribal Nation.
5. **In the case where a Tribal Nation is served, or will be served, by multiple land grant institutes,** the corresponding memorandums of agreement (MOAs), should reflect all parties involved.

We recommend an increase of \$30 million for the FRTEP program for the initial 4-year investment with continued funding of the existing 35 positions at an increased level. This will add 90 new agent positions (for a total of the 125) and 27 new specialist positions. Approximately 56% (\$16.9 million) of the first 4-year allocation is to be expended in Phases 1 and 2. The remaining 44% (\$13.1 million) will occur in the last two phases. All allocations are to be based on the recommended formula described on page 12.

Phase 1: Increase funding for the 35 existing Indian Country Extension (FRTEP) positions up to the level commensurate with their County Extension peers. Provide approximately \$3M for Tribal relation development and training to the Extension directors for MOA development. Include \$100,000 per year for 4 years for FRTEP professional development conferences. Each new FRTEP program should receive \$30,000 per year for the first three years of the program.

Phase 2: Target establishing **68 new FRTEP offices**, which includes 58 Agents and 10 full-time equivalents (FTEs) Regional Specialists for approximately **\$10M**.

Phase 3: Add **25 FRTEP new offices**, which includes 25 Agents and an additional 10 FTE Regional Specialists; **(\$5.67M)**

Phase 4: Add **7 new FRTEP offices**, which includes 7 Agents and an additional 7 FTE Regional Specialists **(\$2.45M)**.

This totals **\$24.88M** over a **4-year** rollout.

Phase 5: Incorporate the new base funding levels in future budget requests using the USDA Modified Smith-Lever Formula specific for Indian Country Extension.

We recommend an annual budget of approximately \$140,000 for each new FRTEP office and approximately \$200,000 per FTE for Regional Specialists or an equivalent FTE. Below are the details for new position start-up budgets, and funding for area offices/centers/specialists, professional development conferences, and Tribal relation trainings and support for MOA development.

A per-office (\$140K) estimate is based on 1.0 professional FTEs and 1.0 FTE staff. The following factors illustrate why it is not feasible to develop a finite budget:

1. Each of the land grant institution (1862s, 1890s and 1994s), has its own salary and benefit scales. New and existing Tribal Extension educators/agents must be placed into the same employee system of tenure and/or promotion as County Extension professionals. Agent salaries should be equivalent to, or commensurate with, their existing county peers. Similar considerations are needed for staff. Some Tribes require adherence to Tribal pay scales, some allow staffing under university systems. This category needs flexibility to grow, and to accommodate differences between states and needs of Tribes.
2. With all of the new positions, it will be critical to hold an annual professional development

conference each year at an estimated cost of \$100,000 per year.

3. It is estimated that approximately 117 offices can be established in addition to the existing 35. A list of states and estimated numbers of new offices is attached, as well as the number of Federally Recognized Tribes in each state.

4. Extension directors will be asked to develop refined estimates. We recognize that there may be considerable modification of this budget with ensuing discussions. There will be a need to allocate a portion of the anticipated funds to support the work of MOA development and outreach (\$3M). Please note we recommend funding for any new programs be held in abeyance until such time as state Extension directors develop suitable MOAs with Tribes that wish to participate. Further, it is assumed that as successes are witnessed, more Tribes will request to participate.

5. Start-up costs for each new office are conservatively estimated at \$10K per year for each of the 3 years of the new position. Total: \$2.04M in year 1 for 3 years, \$1.08M in year 2 for 3 years, and \$433K in year 3 for 3 years.

6. Planning for the use of Extension Specialists within a region including several Tribes and reservations may be the best configuration for Extension programming and, in some cases, regardless of state lines. An area office may be designed to serve more than one Tribe or Extension program. Ultimately, this may be less than optimal versus a local Extension office, but a necessary step in the evolution of an Extension presence in some communities. Funding for this facet of a new Indian Country Extension rollout would be \$2M in year 2, \$2.06M in year 3 and \$1.4M in year 4. Distribution of the funding to the states for Federally Recognized Tribal Extension work should be as simple as possible.

7. **PLEASE NOTE:** Once this program arrives at the end of Phase 4; a formula for funds distribution would govern future appropriations (Phase 5). See Part 3 of this document for details.

8. We recommend requiring Extension directors to develop a plan for the number of offices it would be feasible for them to establish over the 3-year period. This could take at least one year, perhaps more in some states.

9. We strongly recommend that the total fund allocation and phase 5 ongoing allocations be adjusted for inflation over time.

Matching requirements: Tribes vary widely on willingness and ability to provide matching funds for



an Extension program they may know little about. While we do not recommend a strict matching requirement, some level of in-kind contribution should be encouraged. By example, there are Indian Country Extension programs that started out in the front seat of a car and 10 years later, have a stand-alone 4-H/Extension office built exclusively for Indian Country Extension work.

Timeline:

PHASE 1: Develop MOA's, budget, university and USDA arrangements, personnel recruiting. Amend/increase budgets for existing programs.

PHASE 2: Continue year 1 activities, establish offices, hire, and staff. Sixty-eight new offices established.

PHASE 3: Continue MOA work. Add 35 new offices.

PHASE 4: Continue MOA work. Add 14 new offices.

PHASE 5: Ongoing appropriated support for existing FRTEP offices per the USDA Modified Smith-Lever Formula Specific to Indian Country Extension. Also governs prospective additional offices post-PHASE 4.



“It gives you some place to go first. If you find a problem, and you don't know where to go, they can be your first call and possibly your last call. But if they can't figure the answer out they will find somebody that can.”



PART 2:

Implementation Requirements for Extension Directors

- Extension Directors are responsible for an extremely diverse programmatic portfolio including Agriculture & Natural Resources (ANR); Family, Consumer, and Health Sciences (FCHS); Community Economic Development (CED) and/or 4-H Youth Development. The specific inclusion of Native American programs, where Tribes exist within their state service area, is a critical piece of the land grant mission and encompasses the unique geographic, cultural, and economic challenges of delivering Extension programs in Indian Country. Having a clear understanding of the Federally Recognized Tribal Extension Programs (FRTEP) and its vital role it plays in effective Indian Country Extension will enable Extension Director to properly fulfill the Cooperative Extension mission for all citizens of respective states.
- In the provision of Extension education programs, the Extension Director must provide an administrative construct that includes both leadership and management for an extended, ongoing FRTEP program as a component of their land-grant university Extension system.
- This FRTEP expansion will provide funding that enables the Extension Director to hire or promote salaried personnel necessary for handling both the leadership and administrative responsibilities for the delivery and management of Tribal Extension programs.
- A designated Tribal Extension program leader, as with ANR, FCHS, CED and/or 4-H, will hold a key position as part of the Extension administration construct; and with knowledge in each of these program areas.
- Financial management of federal funding to support Indian Country Extension through FRTEP must be included in the Extension administration's operations. This includes placement of Tribal Extension educators/agents into the county-based employee system of tenure and/or promotion.
- As with County Extension operations, developing good business relationships with the Tribal councils of the Native Nations participating in the FRTEP programs is essential and may involve collaborations with other institutes. Thus, Extension Directors would need to invest the appropriate level of time and/or resources necessary to fully develop these relationships, reinforcing the importance of having a designated Tribal Extension program leader.
- Because Indian County Extension programs represent a combination of ANR, FCHS, CED, and 4-H program delivery, the FRTEP Agents/Educators play a critical role in managing the coordination of Extension Specialists and seeking appropriate expertise necessary for successful program delivery, as with County-based programs facilitated by a County Agent/Educator, or Advisor. This commitment by non-FRTEP Extension Specialists to serve Tribes and reservations within their service area is an expectation of their responsibilities in cooperation with the Indian Country Extension program leader.

- Successful expansion of FRTEP requires that cultural competencies be built into Extension programs, including knowledge of Tribes, their history, and their political background. This knowledge will benefit and enhance the Cooperative Extension educational delivery system.



“It makes a big difference to have a Native person with so much knowledge, passion and mastery of the programs delivered. Because she is a community member, a tribal member, and lives here, she understands.”



PART 3:

Recommended Funds and Position Distribution Plan

Upon receipt of the USDA allocation for the revised FRTEP program (see part 1), amendments to the existing 35 FRTEP projects to increase their awards to the full funding rate \$140,000 are required. Following this, call for proposals will be sent out to all land grant institutions requesting new applications that meet the requirements stated below.

Ten percent of the total new allocation will be set aside to assist land grant institutes in the development of Tribal relationships and MOA development. These trainings will be scheduled upon request, and the funds will provide for Tribal relations experts, Tribal personnel reimbursements for cost incurred in the MOA development.

1. Must have a signed MOA or equivalent in place with the Tribe(s) located within the institution's state or in collaboration with other institutes where the Tribes cross state lines on the application.
2. Description of the proposed position (new agent, regional agent, or part FTE of specialist/expert)
3. Application must include land in acres including forests, crops, rangelands and streams, lakes, and ocean access, on-reservation population, and per capita income estimates or poverty levels.
4. Project statement of work
5. Estimated budget should include the \$30,000 per year for three years operation line on new agent request.
6. Multiple applications are allowed per state or region as long as MOAs with all parties are in place.

USDA MODIFIED SMITH-LEVER FORMULA

This USDA Modified Smith-Lever Formula describes the method of funding for the permanent support of the new Indian Country Extension Program. This formula reflects the unique needs of Native Americans resident on their reservations and is similar to that used to support ongoing funding of County Extension programs.

Just like the S-L formula for County Extension programs, the ICE formula will be adjusted every 5 years (funded increases only) on key criterion, and again every 10 years on other key criterion (see below).

COMPONENTS OF THE USDA MODIFIED SMITH-LEVER FORMULA

Specific to Indian Country Extension

1. **EQUITY** between land grant institutions: (10%) of the total \$30M appropriation is shared to each state with federally-recognized Tribes equitably.
2. **LAND BASE** of existing reservation exterior boundaries, irrespective of total amount of allotted, fee, Tribal land ownership within. (20%)
3. **POPULATION** of Tribal citizens resident on the reservation or Tribal jurisdictional area. (30%)
4. **PER CAPITA INCOME** of citizens on the reservation. (35%)
5. **CURRENT SUPPORT** or number of FTEs dedicated to Indian Country Extension servicing the program on the reservation. (5%)

Total New Allocation: \$30 million

10% of the allocation (\$3 million total) to be set aside for program administrative positions for each institution (\$60,000 per state)

Funds for all positions: \$27 million

When ranking applications, use an award numbering system 1 through 5 for each of the four variables listed in table 1. Decision Criteria: Note that the first two variables (Land Acres and Access and On-Nation Population) are to be ranked from highest to lowest while the last two variables (Per Capita Income and Number of Tribal Agents) are to be ranked from lowest value to highest. Example: Land Acres and Access with values greater than 500,000 acres would be assigned a 5 and values under 29,999 would be assigned a 1. The same applies to On-Nation Populations. For the last two variables (Per Capita Income and Number of Tribal Agents), both are to be ranked lowest Income and Number of Agents with a 5 for the lowest values and 1 for the highest value. This is done to add more weight to these variables and put them in line with the first two.



Table 1. Decision Criteria:

Land Acres and Access	Assigned Points 5 for most 1 of least	On Nation Population	Assigned Points 5 for most 1 of least2	Per Capita Income (Lower the income higher the rank)	Assigned Points 1 for most 5 of least	Number of Current Tribal Agents	Assigned Points 1 for most 5 of least
500,000 ≥	5	50,000 ≥	5	\$35,672 ≥ U.S. Rate	1	5 +	1
200,000 to 499,999	4	30,000 to 49,999	4	\$30,000 to \$35,671	2	4 to 5	2
80,000 to 199,999	3	20,000 to 29,999	3	\$20,000 to \$29,999	3	2 to 3	3
30,000 to 79,999	2	10,000 to 19,999	2	\$10,000 to \$19,999	4	1	4
≤ 29,999	1	≤ 9,999	1	≤ \$9,999	5	0	5

Table 2. Example Six Tribes:

Tribe	Land	On Nation Population	Per Capita Income (Lower the income higher the rank)	# Of current Agent for Tribe
Tribe 1	1.69 Mil	15,313	\$10,198	0
Tribe 2	16,929	9,534	\$20,081	3
Tribe 3	3391	2,258	\$19,895	5
Tribe 4	404,005	12,995	\$31,660	1
Tribe 5	1.93 Mil	25,639	\$24,950	4
Tribe 6	31,748	7,848	\$12,446	0

Table 3. Final Ranking Based on Criteria:

Tribe	Rank High to Low	Land	On Nation Population	Per Capita Income (Lower the income higher the rank)	# Of current Agent for Tribe
Tribe 1	17	5	3	4	5
Tribe 5	14	5	4	3	2
Tribe 4	13	4	3	2	4
Tribe 6	13	2	2	4	5
Tribe 2	10	2	2	3	3
Tribe 3	7	1	1	4	1

Recommended sources for data:

Land Source: <https://nativeland.info/blog/dashboard/land-area-totals-for-us-native-lands/>

Tribe Names: <https://www.minneapolisfed.org/indiancountry/resources/reservation-profiles>

Population: <https://data.census.gov/cedsci/table>

Per Cap Income & Population: <https://censusreporter.org/>

EXHIBIT 1:

Indian Country Extension Commission Members

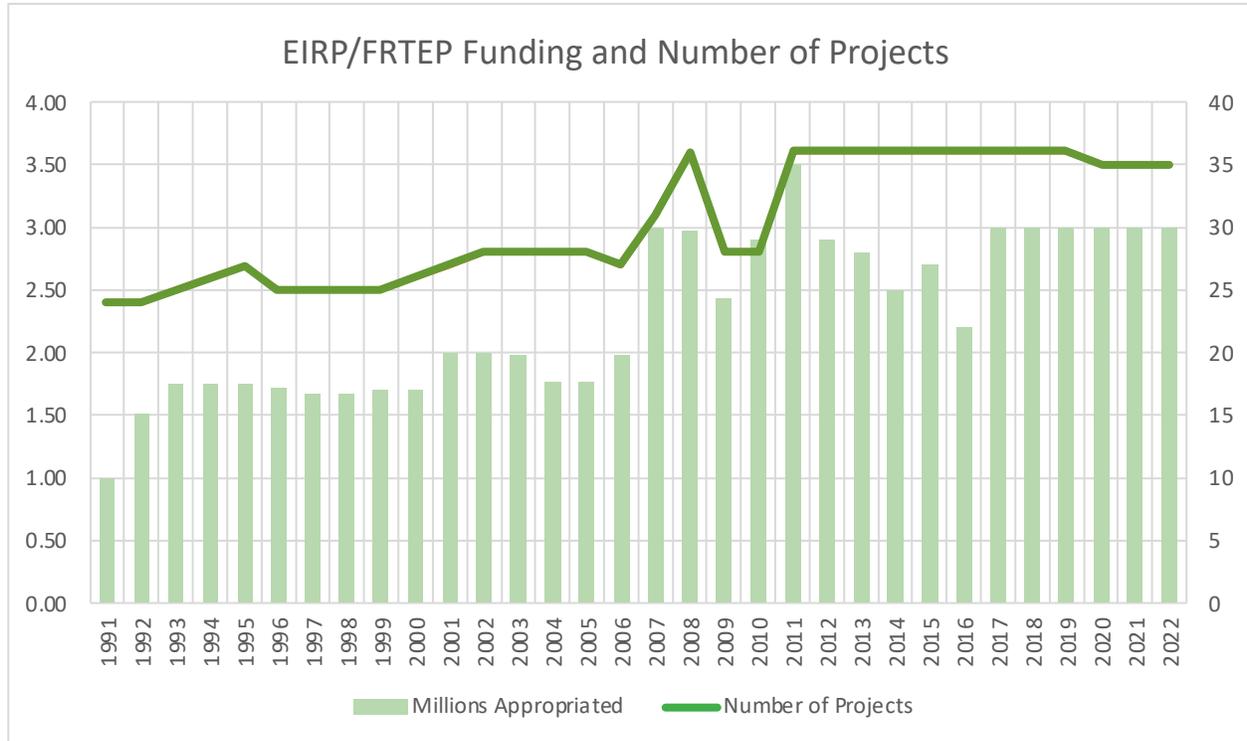
- Co-Chair Trent Teegerstrom, Associate Director Tribal Extension Programs, University of Arizona
- Co-Chair Jo Ann Warner, Associate Director, Western Extension Risk Management Education Center (Western Center), Washington State University
- Co-Chair Dr. Joe Hiller, Professor Emeritus, University of Arizona
- Ronald “Chumper” Walker, Eastern Band of Cherokee Indians North Carolina Cooperative Extension and FRTEP Project Director
- Daniel L. Fagerlie, Washington State University Extension Tribal Liaison and Colville Reservation FRTEP
- Dr. Jeffrey Silvertooth, Professor and Former Dean of Extension, University of Arizona
- Virgil Dupuis, Extension Director, Salish Kootenai College
- Brian Kowalkowski, Dean of Education, College of Menominee Nation
- Karen R. Diver, Senior Advisor to the President, Native American Affairs, University of Minnesota
- Vicki Hebb, University of Nevada, Reno Extension, Agricultural Producer South Dakota Cheyenne River Sioux Reservation
- Staci Emm, University of Nevada, Reno Extension, Director of Mineral County Cooperative Extension and Nevada FRTEP Director, Walker River Paiute
- Esther Tate Kruse, Fiscal Officer/Management Analyst Agricultural Research Center, CAHNRS Office of Research, Washington State University
- Sarah Vogel J.D., Attorney, Author of “The Farmer’s Lawyer”
- Michel Melvin, Agricultural Producer, Pine Ridge Reservation, South Dakota
- Dr. Doug Steel, Vice President of Food Agriculture and Natural Resources, Association of Public & Land Grant Universities (APLU)
- Cris Stainbrook, President, Indian Land Tenure Foundation

Commission Liaisons:

- Dr. William Hoffman, Chief of Staff, National Institute of Food and Agriculture
- Erin Riley, National Program Leader, Division of Community and Education, Institute of Youth, Family and Community-IYFC

APPENDIX

Table 4. Historical Funding and Number of Positions for the FRTEP 1991 to 2022



* Funding in Millions 0 to 4 and Number of Positions 0 to 40.

“As deadly as that virus was, they still provided services, they still provided programming, they still provided opportunities and they never let that get in the way of everyday life because we still have to get through all that... We are really grateful for that.”





“I think that’s really important that the FRTEP program is creating healthy relationships within our families, within our community. There’s a lot of hardships in the community so it’s really nice to have those happy moments to look forward to.”

Trent Teegerstrom

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