

February 14, 2020

Erin Riley
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Re: Federally Recognized Tribes Extension Program (Docket 2019-27568)

Dear Ms. Riley:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the National Institute of Food and Agriculture at the U.S. Department of Agriculture, in response to the December 23, 2019 request for information for the: “Solicitation of Input from Stakeholders on the Federally Recognized Tribes Extension Program.”

Representing more than 107,000 registered dietitian nutritionists (RDNs), nutrition and dietetic technicians, registered (NDTRs), and advanced degree nutritionists, the Academy is the largest association of food and nutrition professionals in the world and is committed to a vision of the world where all people thrive through the transformative power of food and nutrition.

The Academy supports the intent of FRTEP to respond in accordance with the evolution of tribal community needs and proposes that increased financial investment and resource allocation for the program will help meet the growing portfolio of services. The Academy believes that nutrition and food access, including access to culturally appropriate food, plays a vital role in the health and well-being of Native Americans and honors cultural preferences.

A. Academy Position on Food Insecurity

The Academy is committed to improving the health of Americans by ensuring access to a nourishing, safe and affordable food supply. The Academy’s guiding principle is our commitment to improving health for all, especially those most susceptible to food insecurity. It is the position of the Academy that systematic and sustained action is needed to achieve food and nutrition security in the United States. To achieve food security, effective interventions are needed, along with adequate funding for, and increased utilization of, food and nutrition assistance programs; inclusion of nutrition education in such programs; strategies to support individual and household economic stability; and research to measure impact on food insecurity and health related outcomes.¹ NIFA notes that Extension programs “prepare people to break the cycle of poverty, encourage healthful lifestyles, and prepare youth for responsible adulthood.”

¹ Holben, D. (2010). Position of the American Dietetic Association: Food Insecurity in the United States. *Journal of the American Dietetic Association*. 110(9), 1368-1377.

Poverty is a problem among Native Americans. In 2010 approximately one in four American Indian and Native Alaskan households lived below the poverty level²; the rate is even higher for those living on reservations.³ For these individuals and families in poverty, "limited funds mean limited access to nutritious foods such as fresh fruits and vegetables or whole grain carbohydrates, which are often more expensive than commodity goods like flour or shortening."⁴

As the Academy has previously noted:

Native populations are disproportionately affected by nutrition-related chronic diseases and conditions. "As with overweight and obesity, AI/ANs are disproportionately affected by diabetes, with some estimates suggesting that AI/ANs are 2.3 times more likely to have diabetes than are individuals in the U.S. general population. Furthermore, approximately 16.5 percent of the total AI/AN adult population served by the IHS have been diagnosed with diabetes, which is twice the diagnosed rate among non-Hispanic whites in the United States."⁵ In addition, "American Indian (AI) and Alaska Native (AN) children have approximately twice the levels of food insecurity, obesity, and Type II diabetes, relative to the averages for all U.S. children of similar ages."⁶

Many AI/ANs also lack access to health care options, with 23% of the population not possessing health insurance in 2012 and 38% relying on Medicaid for insurance.⁷ As one commentator notes, "Given this reality of severely underfunded healthcare services, the need to focus on preventive healthcare measures (e.g., healthful eating, exercise, routine care) becomes all the more vital in American Indian communities."^{8,9}

The Academy supports the opportunity FRTEP grants afford tribal communities in providing education that is tailored and unique to the needs and values of the individuals served.

² Goetz, G. (2012, March 5) Nutrition a Pressing Concern for American Indians.

<https://www.foodsafetynews.com/2012/03/nutrition-a-pressing-concern-for-american-indians/>. Accessed February 14, 2020.

³ Akee, R. (2019, March 12) How measuring poverty and welfare affect American Indian children?

<https://www.brookings.edu/blog/up-front/2019/03/12/how-does-measuring-poverty-and-welfare-affect-american-indian-children/>. Accessed on February 14, 2020.

⁴ Goetz, G. (2012, March 5) Nutrition a Pressing Concern for American Indians.

<https://www.foodsafetynews.com/2012/03/nutrition-a-pressing-concern-for-american-indians/>. Accessed February 14, 2020.

⁵ "Addressing Child Hunger and Obesity in Indian Country: Report to Congress" Mathematica Policy Research.

January 12, 2012. <https://fns-prod.azureedge.net/sites/default/files/IndianCountry.pdf>. Accessed February 14, 2020. (Internal citations omitted.)

⁶ Ibid.

⁷ "American Indian/Alaska Native Profile" The Office of Minority Health. September 17, 2012.

<https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=3&lvlid=62>. Accessed February 14, 2020.

⁸ Kovacs, E and Ip, M. "Address Health Disparities in American Indians — Cultivating Traditions and Promoting Nutrition Can Make a Difference." *Today's Dietitian*. Vol. 13 No. 6 P. 36.

⁹ "Comments USDA 1994 Tribal Scholars Program" <https://www.eatrightpro.org/news-center/on-the-pulse-of-public-policy/regulatory-comments/comments-usda-1994-tribal-scholars-program>. Accessed February 14, 2020.

B. Traditional Foods

American Indian communities across the country are embodying traditional foods as part of the global Indigenous food sovereignty movement that embraces identity, history and traditional ways and practices to address health and food security.¹⁰ According to the CDC, tribal leaders suggested that these practices are not widely understood by federal agencies and are often not supported with financial and technical resources.¹¹ The Academy believes it is imperative to be aware of and fully consider the social and cultural aspects of food consumption when planning educational programs to address nutritional concerns of individuals and groups.¹² NIFA should emphasize best practices around strategies to support growing and consuming traditional foods as part of the next FRTEP grant application, in addition to collaborating with tribal leaders when determining which interventions are most appropriate. According to NIFA's website, "Extension educators use modern technology to disseminate knowledge and tools but also rely on traditional human values and relationships to gain the attention and trust from the people they serve. As residents of the communities in which they work, local extension agents bring credibility to their roles as educators."

C. Investment in FRTEP Grants

According to the request for information, the purpose of FRTEP is to establish an Extension presence and support Extension outreach on Federally Recognized Indian Reservations and Tribal jurisdictions of Federally Recognized Tribes. The grant aims have evolved to support an ever-changing and growing portfolio of activities in response to identified community needs. However, the program has been flat funded for more than 10 years. As a result, Academy members and partners have expressed concern that the impact of the grants may be diluted if the funding doesn't increase in concert with the increased outcome expectation. Moreover, during the period of stagnant funding additional entities have become eligible to receive grant funds further diminishing the pool of resources. The Academy suggests that a greater investment in FRTEP grants will help support efforts to better meet the growing needs of the tribal communities. We advocate for increased NIFA funds in future budget requests offered by the USDA.

The Academy appreciates the opportunity to comment on NIFA's request for information, for the: "Solicitation of Input from Stakeholders on the Federally Recognized Tribes Extension Program." Please contact either Jeanne Blankenship by telephone at 312-899-1730 or by email at jblankenship@eatright.org or Liz Campbell by telephone at 202-775-8277 ext. 6021 or by email at ecampbell@eatright.org with any questions or requests for additional information.

Sincerely,

¹⁰ Good Health and Wellness in Indian Country. <https://www.cdc.gov/healthytribes/index.htm>. Accessed February 13, 2020.

¹¹ Ibid

¹² Johnson-Askew WL, Gordon L, Sockalingam S. Practice Paper of the American Dietetic Association: Addressing racial and ethnic health disparities. J Am Diet Assoc. 2011;111(3):446-456.



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