REIMAGINING HUNGER RESPONSES IN TIMES OF CRISIS

Insights from Case Examples and a Survey of Native Communities' Food Access During **COVID-19**











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INDIGENOUS FOOD AND AGRICULTURE INITIATIVE

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NATIVE AMERICAN AGRICULTURE FUND



Waý, Hello,

For Native Americans and Alaska Natives, food insecurity and nutritional deficiencies are not "normal." Our traditions and cultures were founded on and central to FOOD. Many Tribes refer to a creation story steeped in all forms of food and fiber provided to the original people in exchange for protection or reciprocation of mutual sacrifices. As they are often referenced, the "first foods" provided to our ancestors were highly nutrient-rich, were once abundant, and harvested humanely.

Despite the deep connection to food and land, as we see in this report and others, Native American and Alaska Native populations routinely rank among the highest in nearly every adverse health statistic related to food and nutrition. The reasons why indigenous people cannot fully participate in our traditional food practices are numerous and heartbreaking here and throughout the world.

Current generations are grappling with a myriad of environmental issues, including man-made and natural disasters. To bring to light the obstacles and disparities of Native American and Alaska Native communities and Tribal citizens, we need adequate first-hand figures. Current relevant data can shift narratives and provide evidence for everyone willing to assist these populations in leading their efforts in reclaiming food security and sovereignty.

Understanding the rates of food insecurity and hunger challenges that affect the communities we directly serve is critical to identifying how we continue to make effective efforts in our collective work to repair America's broken food system. The Federal Government has a trust responsibility to tribes to address food insecurity issues but lacks sufficient data on hunger rates and adequate nutrition measures. To create a food system that feeds people and truly nourishes them, we must understand hunger deficits. In this way, we are all provided with a clear vision that meets our needs.

The Native American Agriculture Fund invites you to join our partners and us in working together to support a more equitable and sustainable food system for all.

Limílmt, Thank you, Toni Stanger-McLaughlin, J.D. (Colville), CEO Native American Agriculture Fund

FOOD RESEARCH & ACTION CENTER



At the Food Research & Action Center (FRAC), we uphold the standard that research, policy, and programs serving or impacting Native American communities should be led by Native American organizations and embedded in their communities. We are honored to join the Native American Agriculture Fund (NAAF) and the Indigenous Food and Agriculture Initiative (IFAI) in the release of this pivotal report documenting the extent of food insecurity in Native American communities during COVID-19, and the resilient, Native-led responses.

As we work to eradicate hunger, data is essential to track progress and secure resources to help alleviate this pervasive issue. Unfortunately, the government's annual, and during COVID biweekly, reports on food security overlook Native American households. This lack of data is part of the greater issue of erasure and invisibility which has existed for decades. We welcomed NAAF's invitation to be part of their undertaking to assess and report on food access among Native American households to help fill this data gap. We are grateful for NAAF's leadership on this timely issue.

The report recommendations are vital to reducing food insecurity and advancing equity in the food system and federal nutrition programs in the midst of tremendous need in Native American communities. Our hope is that this report will be used by advocates, decision makers, and many others, as a guide to recognize and support the strength and resiliency in Native American communities through resources, policy, and programmatic action. We are eager to continue our work together to advocate for a more equitable and sustainable food system for all.

Luis Guardia, M.S., MBA President, Food Research & Action Center

INDIGENOUS FOOD & Agriculture initiative



The Indigenous Food and Agriculture Initiative (IFAI) is proud to join NAAF and FRAC in the release of this report, calling attention to the pandemic's impacts on Native food systems and food security. One of IFAI's core principles is the importance of supporting and empowering Tribal governments as they express their inherent sovereignty in the space of food and agriculture, and as we do that work daily with Tribal Nations across Indian Country, the need for more Native-driven data collection and Native-controlled data around food systems and food security has never been more apparent.

This report begins to address these needs by prioritizing Native-led data collection and analysis of household level food insecurity in Indian Country. The data presented here show the significant food security needs in Indian Country that were exacerbated by the pandemic. These data also tell the story of the critical support that Tribal governments provide to their citizens in accessing food, especially in times of extreme crisis. As IFAI worked with the National Association of Food Distribution Programs on Indian Reservations (NAFDPIR) to analyze their FDPIR impact survey data in the early months of the pandemic, we saw that critical support from Tribal governments firsthand. We also saw Tribal leadership stepping up and working directly with USDA officials to provide Tribally led solutions to pandemic-related food system problems. Similar solutions and recommendations are also included in this report.

The work of centering Tribal sovereignty in food systems cannot be accomplished without Native control of Native data around food security efforts and Native-led policy change. We hope that this report is only the beginning of that work, and that this report illuminates not only the challenges of food security in Indian Country, but the Tribally-driven solutions to those challenges as well.

Erin Parker, J.D., LL.M. Director, Indigenous Food and Agriculture Initiative

EXECUTIVE SUMMARY

Native American communities remain resilient in the face of disproportionately high rates of poverty, hunger, unemployment, and poor health, both before and during COVID-19. For American Indian and Alaska Native communities, disparities in food insecurity are a result of the structural racism originating with colonization and continuing to the present. A key step in addressing food insecurity for Native populations is measuring and monitoring the issue, but there is no current comprehensive measure of food insecurity for Native populations. The NAAF Food Access Survey aims to fill this data gap for Native American communities during COVID-19.

NAAF's survey, launched in February 2021, garnered more than 500 survey respondents. Respondents represent a wide diversity of Tribal communities and span states across the country. Results reveal far too many Native American households experience food insecurity and food access challenges. Among American Indian and Alaska Native respondents, half experienced food insecurity during COVID-19 and one in four experienced very low food security. Analysis shows that food insecurity is significantly higher for respondents in households with children under 18, respondents that had a disruption in employment during COVID-19, and those that self-reported a fair or poor health status.







The NAAF Food Access Survey provides critical data to properly inform and construct a more secure food supply chain for Tribal communities that can rapidly respond to hunger needs. However, due to limited federal data collection on food insecurity and other factors in Indian Country, federal policies and programs are lacking information, resulting in an inadequate response to meet the needs of Native communities. During COVID-19, Tribal governments, Native-led organizations, and Native producers pivoted to, addressing reports of rising hunger and countering the apathetic federal government response to hunger in Indian Country. Preliminary outcomes of NAAF's Rapid Response funding show that Native-led entities coordinated business support, fostered partnerships for food delivery, increased food production through infrastructure improvements, to name a few, to bolster local food economies, strengthen food security systems, and meet the nutrition needs of their communities.

The report concludes with recommendations to strengthen Tribal governments' and Native producers' role at the decision-making table regarding feeding their communities moving forward. Recommendations actionable by Congress and USDA include improvements to agricultural infrastructure, the federal nutrition programs, and data collection methods.

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FEDERAL AND NATIVE-LED Responses to hunger during covid-19

COVID-19 underscored existing gaps in data and inadequate federal responses to hunger in Indian Country and simultaneously highlighted the swift actions of Native-led entities in addressing these gaps for their communities.

COVID-19 EXACERBATED FOOD INSECURITY DETERMINANTS AND DISPARITIES

As a result of systemic racism and conscious unmet obligations by the federal, state and local U.S. governments, community food deficits are a pervasive fact of life, persisting for centuries for American Indian and Alaska Native communities.^{1,2,3,4} Traumatic events like pandemics amplify these circumstances.

Prior to COVID-19, Native Americans faced disproportionately high rates of poverty, unemployment, poor health or living/working conditions.^{5,6,7,8,9,10,11,12} Lack of federal support contributes to these gaps in critical infrastructure — federal spending per person on American Indian or Alaska Native U.S. citizens is only two-thirds of the spending on the average U.S. citizen.¹³ During COVID-19, disparities in unemployment, and COVID-19 cases and deaths have grown.^{14,15,16,17} In Tribal areas, high rates of COVID-19 have been associated with structural inequalities and environmental racism.^{18,19,20,21} In addition to elevated unemployment and poor health, food supply chain disruptions and rising food prices contributed to decreased access to food for Native communities during COVID-19, and exacerbated the already higher food prices on Tribal lands.^{22,23}



THE FEDERAL RESPONSE TO FOOD INSECURITY Was inadequate in Indian Country



There is no current comprehensive measure of food security among Native American households before or during COVID-19. Data may be collected but it is often incapable of being linked to individual Native American or Alaska Native Tribes or communities. Due to limited data collection on food insecurity and other factors, federal policies and programs are lacking information, resulting in an inadequate response to meet the needs of Native communities before and during COVID-19.

For example, food assistance was delayed to Native communities because Tribal governments are not listed as eligible administrators of some commodity programs ²⁴ and the child nutrition programs. The federal nutrition program, Food Distribution Program on Indian Reservations (FDPIR), provides USDA foods to income-eligible households living on Indian reservations and to Native American households residing in designated areas near reservations or in Oklahoma. Although funds were appropriated to FDPIR as part of the COVID-19 response legislation in the CARES Act, the use of these funds to purchase additional foods in FDPIR were delayed.

Further, FDPIR did not receive equivalently enhanced benefits during COVID-19 as other federal nutrition programs did, nor were the CARES Act administrative funds ever released. Additional information on the impacts of COVID-19 on FDPIR are included in a case study later in this report.

NATIVE-LED ENTITIES QUICKLY SHIFTED TO MEET THE NEEDS OF THEIR COMMUNITIES

In response to reports of rising hunger and the apathetic federal government responses, Tribal governments, Native-led organizations, and Native producers pivoted to meet the immediate and long-term nutrition needs of their communities. With the present so uncertain, Native producers turned to the future by planting seeds to help provide sustenance to their communities. Tribal governments organized food purchases for their citizens and gathered donations from the others to meet the needs of their communities.

The Native American Agriculture Fund responded to COVID-19 challenges by launching \$2 million dollars in Rapid Response funding to 74 existing grantees to aid Tribal producers and their communities during the COVID-19 crisis. The Rapid Response funds help non-profits, community development financial institutions (CDFI), educational institutions, and Tribal governments to implement innovative projects across the country that respond to immediate needs in Indian Country's food system. In addition to actively supporting the food and nutrition needs of individuals, Native American-led organizations also assumed the responsibility of collecting and analyzing food insecurity data among Native American communities - a fiduciary responsibility neglected in federal surveys of food insecurity before and during COVID-19. With the understanding that there was no dataset to measure the extent of hunger in Indian County, the Native American Agriculture Fund (NAAF) reached out to the Indigenous Food and Agriculture Initiative (IFAI) and the Food Research Action Center (FRAC) to discuss how to follow the hunger crisis. The organizations decided to launch a survey to better understand the issues of hunger and food insecurity in Native American households during COVID-19.

Our aim is for federal government food insecurity surveys to work in partnership with Tribal governments to adequately sample Native American and Indigenous peoples, but in the interim, the NAAF Food Access Survey will help stakeholders understand the breadth and depth of the issues of hunger, food insecurity, and low food access in Native American households during COVID-19 and beyond. We will continue to urge entities that measure food security nationally to do so in a way that is inclusive of American Indian and Alaska Native communities.

FOOD ACCESS DURING COVID-19 SURVEY

NAAF's Food Access Survey launched on February 10th 2021 and remained open through April 2021. The survey was distributed via NAAF's widespread network via press releases, newsletters, email, and paper copies. The survey asked a maximum of 31 multiple choice and free response questions. The survey prompted respondents about a variety of factors related to food access, food security, health, employment, and demographics. Respondents were also asked about which food outlets, nutrition programs, and organizations they used to obtain food before and during COVID-19. To create the survey, we adapted survey questions from previously administered validated surveys and the full Food Access Survey was pilot tested among a sample of target respondents. Question order, phrasing, and overall length was revised based on the cognitive interview results.

To assess food insecurity during COVID-19, the survey included validated questions that comprise the 6-Item Short Form of the U.S. Department of Agriculture's (USDA) Food Security Module. The 6-Item Short Form is a subset of the standard 18 item U.S. Food Security Survey Module used in the Current Population Survey Food Security Supplement (CPS-FSS). CPS-FSS is the source of the national and State-level statistics on food insecurity used in USDA's annual reports on household food security. In the NAAF survey, the timeframe of "During COVID-19" was defined as March 2020 to the present day at which time the respondent answered the survey. The time frame "Before COVID-19" was defined as the year before the pandemic, March 2019 to March 2020. The 6-item food security module was used in this survey because it poses less respondent burden for food-insecure households while maintaining minimally biased prevalence estimates of food insecurity and very low food security relative to estimates based on the 18-item module.



ABOUT THE SURVEY RESPONDENTS

There were 504 American Indian or Alaska Native survey respondents. Respondents represent a wide diversity of Tribal communities (Figure 1) and 34 states across the country. A full list of respondents' Tribal affiliations can be found in Appendix E.

Figure 1. NAAF Food Access Survey Respondents' Tribal Community Affiliations, Sized by Frequency of Response



Source: Native American Agriculture Fund Food Access Survey

Respondent characteristics are summarized in Figure 2 and a full list can be found in Appendix A.

Figure 2. Select Characteristics of NAAF Food Access Survey Respondents



Source: Native American Agriculture Fund Food Access Survey

FOOD INSECURITY IS TOO HIGH IN INDIAN COUNTRY

SURVEY RESULTS AND DISCUSSION

The condition of food security indicates that a household has reliable access to enough, quality food for an active, healthy life. A <u>recent review of hunger, poverty, and health during COVID-19</u> <u>among American Indian and Alaska Native communities</u>²⁵ reveals that few studies have focused on food insecurity in Native communities, but those that do expose that Native households experience food insecurity at shockingly higher rates than the general public and White households. ^{26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36}

Consistent with other surveys of food insecurity in Indian Country, the NAAF Food Access Survey reveals far too many Native American households experience food insecurity and food access challenges. Among all survey respondents that identify as American Indian and Alaska Native, 437 (86 percent) completed the food insecurity module. Among these respondents, half (49 percent) experienced food insecurity during COVID-19 (March 2020 through April 2021) and 25 percent experienced very low food security.³⁷ These levels are unacceptable, especially in comparison to other online surveys that assessed food insecurity during COVID-19, and more needs to be done to ameliorate food insecurity across Indian Country. Among online surveys conducted during COVID-19^{38, 39, 40, 41, 42} rates of food insecurity reported for the overall study populations range from 15 percent to 38 percent.⁴³ None of these surveys collected data that could be disaggregated for Native populations.

WHAT'S IN A FOOD SECURITY STATUS?

The 6-Item Short Form of the U.S. Department of Agriculture's (USDA) Food Security Module is the validated survey tool used to assess food insecurity in the NAAF survey. This module consists of multiple questions that when scored in aggregate provide respondents' food security status. Responses to individual questions can also provide important insights.

54%

54 percent indicated that sometime or often during COVID-19 they couldn't afford to eat balanced meals.



48 percent indicated that sometime or often during COVID-19 the food their household bought just didn't last, and they didn't have money to get more.

37%

37 percent indicated that, in at least one month during COVID-19, they or other adults in their household cut the size of meals or skipped meals because there wasn't enough money for food. Ten percent reported this occurred almost every month during COVID-19.

34%

34 percent indicated that they ate less than they felt they should because there wasn't enough money for food.

POVERTY AND POOR HEALTH Impact food insecurity

Hunger, poverty, and poor health are bidirectionally interconnected, creating a vicious cycle.⁴⁴ COVID-19 has acted as a mediating factor in this cycle, exacerbating the negative impacts of each and worsening disparities. The recent report, <u>Hunger, Poverty, and Health Disparities During</u> <u>COVID-19 and the Federal Nutrition Programs' Role in an Equitable Recovery</u> details the reciprocal relationships between hunger, poverty, and poor health and the role of COVID-19 in this cycle. Examples of the relationships are found in Figure 3 and the impacts are reflected in the food security data when disaggregated by various factors.



Figure 3. Relationships Between Poverty, Hunger, Health, and COVID-19 in Native American Communities

Appendix B details the food insecurity rates of respondents by various characteristics and further explanations are detailed in the sections below.

FOOD INSECURITY RATES VARY BY RESPONDENT CHARACTERISTICS FOOD INSECURITY BY HOUSEHOLD COMPOSITION

Food insecurity rates are statistically significantly higher for respondents with children under age 18 in their household (p=0.001), with 56 percent experiencing food insecurity and 31 percent experiencing very low food security during COVID-19. Similarly, 59 percent of respondents with children under age 5 in their household experienced food insecurity and 33 percent experienced very low food security (Figure 4).

Households with children experiencing greater levels of food insecurity is a pattern consistent across online surveys of food insecurity conducted during COVID-19 and with the latest 2020 USDA Economic Research Service's (ERS) annual food security estimates. A recent review of other online surveys during COVID-19⁴⁵ provides evidence that regardless of the data source, studies consistently find that food hardship has increased during COVID-19 and is higher among households with children. Congruent with this pattern, USDA ERS's annual report, Household Food Security in the United States in 2020, shows that the rate of food insecurity in 2020 (most of which was characterized by COVID-19) for households with children (14.8 percent) was higher than for those without children (8.8 percent).⁴⁶

The rate of food insecurity for households with children increased from 13.6 in 2019 to 14.8 percent in 2020.

One contributing factor to this pattern is that when schools and child care locations shut down in-person services during COVID-19, children lost access to free and reduced-price school meals and child care meals provided through the National School Lunch, School Breakfast, and Child and Adult Care Food Programs. When children miss out on meals and snacks provided by these programs, it strains family budgets, contributing to food insecurity and fewer healthy meals for children at home.

The food insecurity rate for respondents without an adult 65 years and older in their household (51 percent) was 9 percentage points higher than the rate for respondents with an adult 65 and older in their household (42 percent) as seen in Figure 5. This is reflective of the merits of universal basic income like social security income.





FOOD INSECURITY BY EMPLOYMENT DISRUPTIONS

Research supports that low income is a principal cause of food insecurity.⁴⁷ Disruptions in employment, like those that occurred pervasively during COVID-19 can lower household income. Over 55 percent of survey respondents reported at least one type of employment disruption in their household during COVID-19. Types of employment disruptions include job loss, reduced hours or income, and being furloughed from a job. Respondents that experienced a disruption in employment have statistically significantly higher rates of food insecurity than those that did not (p<0.0001). Those with a disruption in employment had almost double the rate of food insecurity and almost triple the rate of very low food security compared to respondents that did not report any employment disruption (Figure 6).





FOOD INSECURITY BY PLACE OF RESIDENCE

Over two thirds of respondents (68 percent) live on Tribal lands. Respondents residing on Tribal lands have a similar food insecurity rate (50 percent) to those that do not reside on Tribal lands (49 percent). However, when comparing very low food security for the two groups, those that do not reside on Tribal lands experience higher rates. Almost 28 percent of respondents that do not live on Tribal lands experienced very low food security compared to 23 percent of respondents that live on Tribal lands. One explanation for this difference in very low food security rates is that respondents residing on Tribal lands may have easier access to Tribal resources and nutrition program services.

FOOD INSECURITY BY GROCERY STORE ACCESS

Low food access can be defined as living greater than 1 mile from the nearest supermarket, supercenter, or large grocery store for an urban area or greater than 10 miles for a rural area.⁴⁸ Only 3 percent of respondents live within 1 mile of a grocery store. At least 48 percent of survey respondents have low food access as they reported living greater than 10 miles from the nearest grocery store. Respondents that reside on Tribal Lands live almost triple the distance from the grocery store on average compared to respondents that do not reside on Tribal Lands. The average distance to the nearest grocery store for Tribal Land residents is 21.7 miles, compared to 7.4 for respondents not living on Tribal Lands (Appendix C).

Regardless of respondents' proximity to the grocery store, the rates of food insecurity experienced are too high. There was no statistically significant difference in food insecurity when comparing rates for those that live 1 or fewer miles (55 percent) compared to greater than 1 mile (47 percent) nor comparing rates for those that live 10 or fewer miles (48 percent) compared to greater than 10 miles (46 percent) to the nearest grocery store. For all of these groups, the rates of food insecurity are unacceptable.

FOOD INSECURITY BY SELF REPORTED HEALTH STATUS

The NAAF survey also assessed respondents' self reported health status and presence of a variety of chronic health conditions.

For self-reported health status, 40 percent rated their general health as Fair or Poor, over half (54 percent) rated their health as Good or Very Good, and 5 percent rated their health as Excellent. Proportionally, fewer survey respondents rate their health as Excellent or Very Good compared to the general U.S. population. Conversely, a greater proportion of survey respondents rate their health as Fair or Poor than the overall U.S. population⁴⁹ seen in Figure 7.



These self-reported health findings are consistent with national health data. According to the U.S. Commission on Civil Rights, American Indian and Alaska Native people are 20–25 years behind the average American in health status, representing the largest disparity in unmet health care needs.⁵⁰ Compared to any other racial or ethnic group, Native communities have higher rates of being uninsured and of underlying health conditions (e.g., heart disease, diabetes, chronic lower respiratory diseases, and hypertension).^{51, 52}

The rate of food insecurity and very low food security was statistically significantly higher for respondents that reported fair or poor health (64 percent food insecurity, 38 percent very low food security) than those that rated their health as good, very good, or excellent (37 percent food insecurity, 15 percent very low food security) as seen in Figure 8 (p<0.0001). This inverse relationship between self reported health status and food insecurity is expected as evidenced by the ways in which food insecurity and poor health are cyclical, described below.





Figure 8. Food Insecurity and Very Low Food Security Rates During COVID-19 by Self-Reported Health Status

Food insecurity drives poor health outcomes by contributing to poor diet and nutrient deficiencies^{53, 54, 55, 56} and depression and anxiety.^{57, 58, 59} Additionally, food insecurity, particularly chronic food insecurity, is associated with chronic diseases, including kidney disease, obesity, cardiovascular disease, and diabetes.^{60, 61, 62, 63}

Food insecurity is also associated with poor health and educational outcomes among children,⁶⁴ even when children are only marginally food insecure.⁶⁵ This may be due to the direct effects of food insecurity or due to other circumstances of living in food-insecure households. This means that any prolonged food insecurity among children during COVID-19 will have implications over the life course for affected children.

Poor health and disability can in-turn contribute to food insecurity through multiple mechanisms. ^{66, 67, 68, 69, 70, 71} Poor health can increase healthcare costs and other expenses, reducing disposable income for healthy, nutritious foods. In addition, chronic health conditions can also impact an individual's ability to work and earn income. Each of these factors can increase the risk for food insecurity.

NATIVE COMMUNITIES' FOOD ACCESS SHIFTED DURING COVID-19

COVID-19 prompted disruptions in food supply chains, need for social distancing, changes in employment and income, and nutrition support responses from Federal and Tribal governments. As a result of these changes, the sources of food that respondents used to obtain food shifted during this time. Survey results indicate that Native individuals turned to Tribal governments and Tribal-led organizations for food assistance during COVID-19 with half of the respondents reporting having received food assistance through these entities. Food sovereignty remains a key factor with about half the respondents reporting gardening, hunting, sharing, and trading food as a source of food for their families during COVID-19. During COVID-19, the use of the Food Distribution Program on Indian Reservations (FDPIR), food pantries, local farmer donations, and grocery curbside pick-up and delivery increased among respondents, whereas use of grocery stores/supermarkets, restaurants, and farmer's markets decreased (Appendix D).

This data is crucial to properly inform and construct a more secure food supply chain for Tribal communities that can rapidly respond to hunger needs. Additional survey results on food access are outlined in detail below.

PLACES USED TO PROCURE FOOD SHIFTED TO MEET Social distancing needs and increased hunger

In the year before COVID-19, the outlets used to obtain food by the greatest proportion of respondents included grocery stores (88 percent), eat-in restaurants (66 percent), and local farms (52 percent). During COVID-19, the proportion of respondents that used these places to procure food decreased while the use of to-go restaurants, grocery delivery, food banks, food pantries, and soup kitchens increased. Grocery stores remained the most widely used outlet to procure food during COVID-19 with 78 percent of respondents shopping at a grocery store from March 2020 through April 2021, but as a result of the shift in procurement places, to-go restaurants (61 percent), food pantries or food banks (44 percent), convenience stores (35 percent), and grocery delivery (34 percent) are the next most widely used food outlets (Figure 9 and Appendix D1).

The greatest increase in food procurement outlet use was grocery delivery. Before COVID-19, 6 percent of respondents had used grocery delivery, but during COVID-19 this increased 487 percent to 34 percent of respondents. The use of food pantries or food banks and shelters or soup kitchens each tripled from before to during COVID-19. This increased use of emergency food assistance is evidence of the immense food hardship that families, particularly Native families, faced during the pandemic and their communities' resilient response to meet increased demand for food assistance.





USE OF NUTRITION PROGRAMS INCREASED

Federal nutrition programs asked about in the NAAF Food Access Survey include the Supplemental Nutrition Assistance Program (SNAP); Special Supplemental Nutrition Program for Women, Infants, and Children (WIC); Food Distribution Program on Indian Reservations (FDPIR), and Child Nutrition Programs such as the School Breakfast Program; National School Lunch Program; Summer Nutrition Programs; and Child and Adult Care Food Program (Appendix D2).

A vital source of support, the federal nutrition programs can help reduce food insecurity, improve dietary intake and health, protect against obesity, and boost learning and development. In addition, the federal nutrition programs support economic security, help lift families out of poverty, and act as a stimulus for local economies.^{72, 73}

FDPIR is a federal program administered by 276 Tribal governments that provides USDA commodity foods to households with lowincome living on Indian reservations and to Native American households residing in designated areas near reservations or in Oklahoma.⁷⁴ Before COVID-19, 1 in 9 respondents utilized FDPIR and 1 in 7 utilized SNAP, a federal program that provides nutrition benefits to supplement the food budget of families with low-income so they can purchase healthy food. FDPIR is the only commodity food program that cannot be used in conjunction with SNAP benefits.⁷⁵

During COVID-19, both FDPIR and SNAP participation increased among NAAF Food Access Survey respondents, but FDPIR increased at a higher rate, with a 214 percent increase in FDPIR compared to 41 percent increase for SNAP (Figure 10). The food and economic hardship posed by COVID-19 prompted new families to begin participating in FDPIR. Additional information on the impact of COVID-19 on FDPIR, collected by the National Association of Food Distribution Programs on Indian Reservations (NAFDPIR) and analyzed by the Indigenous Food and Agriculture Initiative (IFAI), can be found in the case study section of this report.



Another vital support for families during COVID-19 was the federal child nutrition programs. When schools across the country began to close for in-person learning in the spring of 2020 in response to COVID-19, school nutrition departments, community-based organizations, and Tribal government agencies quickly pivoted and adjusted their operations to continue to provide access to the breakfasts, lunches, suppers, and snacks that families rely on when schools, child care, and afterschool programs are open. The nationwide <u>child nutrition waivers</u> issued by USDA in March 2020 have made it possible for meals to be served safely during the pandemic, including:

- allowing meals to be taken home;
- allowing parents or guardians to pick up meals for their children; and
- allowing sites to provide multiple days' worth of meals at one time.

In addition, USDA has allowed schools and communities to offer meals to all children at no charge by waiving the requirement that summer and afterschool meal sites be located in a low-income area.

As a result of these waivers and the immense response by Native-led entities to supply meals to children, use of school meals or other child nutrition programs increased 65 percent from before to during COVID-19 among all Native respondents that reported living in a household with children under age 18. Among these households, one third (32 percent) utilized school meals or child nutrition programs before COVID-19 and this increased to 53 percent of households during COVID-19 (Figure 11).



TRIBAL ENTITIES LED IN DISTRIBUTING FOOD ASSISTANCE



Despite the vast and disproportionately large hunger and health impacts that COVID-19 imposed on Native communities, Indian Country persisted in doing what they have been doing for centuries, forging a resilient and robust response to systematically created hardships. In the face of food supply chain disruptions, rising hunger, and surging COVID-19 cases, Native-led organizations launched into action to make sure community members that are most at risk for adverse outcomes were supported. When Native individuals faced food procurement challenges and hunger during COVID-19, they turned to trusted messengers, their Tribal governments, community-based organizations, local farmers, and faith based organizations. This response to hunger by Tribal governments and organizations is reflected in the NAAF Food Access Survey data (Figure 12 and Appendix D3).

Photo by Dream of Wild Health, Dec 202

When asked about which organizations respondents had received food assistance from during COVID-19, almost half (47 percent) reported receiving food assistance from their Tribal government. This is an increase of 481 percent compared to the year before COVID-19. The next most widely utilized organizations include Tribal-led organizations and local farmers with 40 percent and 29 percent of survey respondents indicating they had received food assistance from these entities during COVID-19, respectively.

This data exemplifies the key role Tribal governments do and should play as a reliable source of food for their people. Case study examples demonstrate that Tribal governments have the knowledge, wisdom, assets, and resources to function as leaders in feeding their communities. Further, it highlights the untapped potential of Tribes to be active participants in a food supply chain on a local level to get the job done.



FARMERS TO FAMILIES FOOD BOX

In response to COVID-19, USDA launched a new program, the Farmers to Families Food Box Program (Food Box Program) using flexibilities provided by the Families First Coronavirus Response Act. Through this program, USDA purchased fresh produce, dairy, and meat products from U.S.-based producers of all sizes, which distributors packaged into family-sized boxes and transported to food banks and other charitable organizations for distribution to households in need. From May through September of fiscal year 2020, USDA purchased nearly \$2.5 billion in food products, amounting to about 92 million food boxes that support farmers and families.⁷⁶ Over 1 in 3 respondents (36 percent) received a Farmers to Families Food Box during COVID-19. Many Native-led organizations distributed Food Boxes during COVID-19, making this possible.



LOCAL FOOD PROCUREMENT REMAINED A VITAL SOURCE OF NUTRITION

Eating fresh, local foods supports individuals' health and local economies. Despite the multi-sector benefits, there is a pervasive lack of infrastructure to support local food systems nationally, especially in Tribal communities. COVID-19 amplified deficits in local food procurement infrastructure and disrupted national supply chains while simultaneously highlighting Native communities' ability to turn to the future, collecting and planting seeds and forging relationships for sharing and trading food.

During COVID-19, local food procurement opportunities like farmers markets, farm stand sales, and community gardens, all of which involve social interaction made problematic by the pandemic, decreased (Appendix D4). Among survey respondents, use of farmers markets decreased from 58 percent before COVID-19 to 19 percent during COVID-19, a 67 percent decline. Similarly, use of farm stands and community gardens decreased 59 percent and 21 percent respectively.

In response to decreased formal opportunities to procure local foods that involve social interaction, Native communities ramped up activities to grow their own food and engage in informal sharing or trading of food with their neighbors. Comparing before COVID-19 to during COVID-19, home gardening increased from 38 percent to 45 percent of respondents (a 19 percent increase).

Sharing or trading food increased from 29 percent to 39 percent of respondents and foraging and seed collecting increased from 23 to 25 percent of respondents. Similar to decreased availability of grocery store provisions, there was a shortage of seeds due to an increase in home gardening projects and food trade initiatives in communities. If Native communities had more access to home gardening supplies at this time, specifically seeds, the increase in home gradening and food trade/sharing activities may have been greater.



Home gardening (45 percent), hunting (40 percent), sharing or trading food (39 percent), fishing (29 percent), and foraging/seed collecting (25 percent) are the most widely used forms of local food procurement during COVID-19 (Figure 13).





Figure 13. Proportion of Respondents That Utilized Each Local Food Procurement Method Before and During COVID-19



NATIVE PRODUCERS' RESILIENCY AND COVID-19 RESPONSES

NAAF COVID-19 RAPID RESPONSE FUNDING

In March 2020 the COVID-19 pandemic was touching most lives in the U.S. The Native American Agriculture Fund (NAAF) team met in April 2020 to discuss NAAF's response and in May 2020, a process for a rapid response funding (RRF) was put forward to and approved by the board of trustees. The RRF application was offered to existing NAAF grantees to supplement current agriculture programs and keep continuity of projects engaged in agriculture for one or both of the following issue areas;

- 1. providing enhanced business assistance to Native farmers and ranchers
- 2. providing technical support to encourage Native food sovereignty and food production impacting Native communities in response to the impacts of COVID-19.

Awards totaling \$2 million were announced by the end of May 2020.

\$2,000,000 IN RAPID RESPONSE FUNDING


As of September 2021, preliminary final report results show that NAAF RRF funds have served:

- 2,119 Native farmers
- 1,052 Native ranchers
- 86 Native fishers
- 355 Native harvesters
- 2141 Native students
- 2,972 Native youth
- 1,654 Native elders
- 9,441 Native community members



Tribal governments, Tribal colleges, Native CDFI's and non-profits who serve Native farmers and ranchers and who are current NAAF grantees quickly pivoted to address the needs of communities during the pandemic by using NAAF RRF awards. Here are the impacts in the words of grantees:

- "coordinate supporting Native food organizations to facilitate and produce a comprehensive business plan to purchase one of the largest produce farms in the Pacific NW." (Flower Hill Institute)
- "increase food production for the community by adding equipment and buildings, which enabled the distribution of produce to more households than in previous growing seasons." (Cowlitz Indian Tribe)
- "disburse funding to non-profits working to strengthen food security systems on a reservation." (The Lakota Fund)
- "enable community members to participate in the local food economy. Wild harvesters
 were able to supplement their income by harvesting traditional foraged foods in a time of
 great economic uncertainty and participate in a safe outdoor activity that did not expose
 them to the virus. The harvested foods were processed and put in free meal baskets which
 allowed nutritious and culturally relevant food to go out to vulnerable people at a time of
 shocking food insecurity." (San Xavier Cooperative Association)
- "make sure our youth and community had enough healthy food to eat. It was our mission to ensure food insecure youth had access to a hot and healthy take home meal nearly each night." (Cheyenne River Youth Project)
- "develop important new collaborative partnerships in order to facilitate the delivery of fresh boxes of fruit and vegetables to Tribal families unable to access stores and markets off the reservation or without enough funds to assure their families received basic supplies of food and water." (Healthy Futures Inc)
- "complete enhancements to a farmers market facility that was then used as a distribution site for USDA farm to family food boxes. (HoChunk Community Capital Inc)
- install a greenhouse and hoophouse in order to grow year-round produce." (Owens Valley Indian Water Commission)
- "help Tribal producers with soil, seeds/starts, and irrigation set up." (Klamath Trinity Resource Conservation District)
- "focus on a larger, upstream, regional food model that is replicable in other regions throughout Indian Country and will be sustainable, resilient, and Tribally led." (NW Portland Area Indian Health Board)
- "leverage additional funding, which enabled us to take action on the ground and deliver food baskets to more than 100 households." (Rock House Project, Inc.)
- "increase capacity for community food resilience" (Rosebud Economic Development Corporation)
- "support food production of Tribes, community groups and businesses" (Spruce Root, Inc.)
- "increase infrastructure to better deliver buffalo meat to the community and families" (Tanka Fund)

These are just a few of the success stories from RRF grants. Many projects are still active and addressing the ongoing pandemic.

Native farmers and ranchers suffered shutdowns, loss of labor, sickness, and death which impacted their local food supply in addition to the national supply. The processing plants were closed due to employee sickness and there were no outlets for animal harvesting. NAAF grantees pivoted to secure transportation and processing locations and then worked as a community to gather and make sure animals were harvested. Many cattle and bison traveled across four state lines to a Native processing plant. NAAF partnered with the Center for Farm Financial Management, MVSKOKE Fund, Native360 Fund, and Native CDFI Network to implement a four-part webinar series during 2020 focusing on business planning, record keeping, taxes, farm finance, balance sheets, income statements, and agriculture lending. With market prices falling, farmers were holding onto animals and crops, struggling to find a way to financially make it through the year. Many CDFI's offered equity loans, supplemented loan payments, sub grants, and loan loss reserve grants to help keep farmers and ranchers from going into default. Native producers found ways to harvest, process, donate, and deliver food to their communities that would have otherwise gone to waste due to restaurant closures, processing plant shutdowns, and closed farmer markets. In many instances, Native youth were gathered, trained, and put to work in the community food supply chains. NAAF partnered with Farmers Action Legal Group (FLAG) and Farm Aid to host a webinar in April 2020, "Guiding Native Farmers Through COVID-19 Relief & Recovery" on the resources available to Native farmers and ranchers. The webinar was directed towards Native farmers and ranchers and thoroughly reviewed the FLAG Farmers' Guide to the Coronavirus Food Assistance Program answering legal questions related to Native farmers and ranchers. FLAG worked full time to help farm families face the stress of the pandemic.

During the first year of the pandemic, NAAF RRF grantees worked with Native farmers and ranchers and key partners to supply fresh fruit and produce to 2,240 Tribal members, 32,000 pounds of Native farmer and rancher raised meat and produce, 18,656 free meals to Tribal communities, 871 local fresh food boxes to Native families, 110 growing/seed kits for home gardens.

Photo by Zuni Youth Enrichment Project



RAPID RESPONSE FUNDING HIGHLIGHTS

- 110 students received funding for food costs.
- Food production was increased and produce distributed to 285 Tribal members.
- A hoop house was purchased to lengthen the growing season serving 181 Tribal members with produce.
- Tribal members were able to participate in a safe outdoor activity of harvesting traditional foraged foods to be processed and provided in the Free Meals Program serving 300-320 members every 2 weeks.
- 500 \$10 fruit and vegetable vouchers were distributed to Tribal elementary students for use at the Tribal marketplace for local farmers.
- 312 food and traditional tea boxes were assembled by Tribal youth and distributed to Tribal members 2 times per week.
- 2,536 meals were prepared and delivered to the Tribal community. Youth internships harvested over 10,000 pounds of food.
- 16k pounds of fresh produce distributed to Tribal members and 6k pounds were donated to 31 community partners.
- 1k fresh fruit and vegetable boxes distributed to Tribal families.
- Building site allowed the distribution of 3,360 farm to family food boxes to 240 families.
- 66 youth were able to process 4H animals that had no outlet due to covid shut down and fill their family freezer.
- 40 soil, seed, starters, and irrigation kits distributed to Tribal members.
- 243 Tribal members could access fresh grown food at the Tribe's Health and Wellness center.
- 498 food bags including local ground beef, bison snacks, plus more were distributed to Tribal members.
- 6 steers were butchered providing 53 boxes of meat to use in food baskets which were delivered to 100 Tribal households.
- 70 growing kits were distributed to Tribal members.
- 24 \$1,000 grants for farmers suffering a loss during COVID-19.
- Delivered fresh homegrown pork to 150 Tribal families.
- Harvesters provided ingredients for Farm to Community Free Meals Program which fed 300 Tribal members every 2 weeks.
- 84 pound fish boxes and 4 months of fresh eggs were distributed to Tribal members and Elders.
- 211 Tribal members in rural communities had access to buffalo and beef.

REIMAGINING NATIVE FOOD ECONOMIES

In 2020, NAAF released a vision for the future of Native food systems called "<u>Reimagining Native</u> <u>Food Economies.</u>" The stories of Native farmer and rancher resiliency shown by the preliminary results of the NAAF COVID-19 RRF along with the disparities brought forth from the federal nutrition programs during COVID-19 provide proof that now is the time to continue the momentum and push forward on the infrastructure roadmap laid out in Reimagining Native Food Economies. Regional food and agriculture infrastructure would create opportunities that would strengthen Native food systems and provide food security to Native communities. Ten regional food hubs supported by sub-hubs in Native communities across Indian Country will serve as critical resources for Native farmers and ranchers growing and raising local foods. The hubs will feature:

- Meat processing facilities
- Fruits, vegetables, grain, poultry, egg and dairy processing facilities
- Warehouse and storage for products
- Logistics and distribution for products
- Technology and data supporting food economies
- Finance and credit for Native producers

According to the latest USDA census of agriculture, Native farmers and ranchers sold \$3.54 billion worth of agricultural products such as cattle, poultry, and grains. With the regional hub infrastructure, those economic dollars could stay in Indian Country and be captured by Native owned and led enterprises.



OSAGE NATION FOOD SECURITY RESPONSE TO COVID-19"

Much of the Osage Nation, prior to the COVID-19 outbreak, is in a food desert. Access to food is limited. For many Osages, the closest establishment to purchase food is a dollar type or convenience store, greatly limiting their options for healthy choices. Post-COVID-19, the options for all Osages were made that much worse with the store shortages and supply chain disruptions. In an effort to feed people as a direct, necessary response to COVID, the Osage Nation spent a portion of their CARES Act funds towards food production to ensure food security. Due to the extensive nature of this focus and the limited time to implement it, this was the first priority.

MEAT PACKING PLANT AND BUTCHER HOUSE — A 25,000 SQUARE FOOT MEAT PROCESSING PLANT

Utilizing existing Osage owned cattle and bison, the plant will bring enough protein to market to feed the people in the midst of this pandemic and in the future. Osages faced a lack of meat protein in local stores and higher prices for what little was available. Even departments of the Osage Nation such as Early Learning and Elder Nutrition departments faced shortages from their off-reservation suppliers. The plant was constructed in Hominy, OK on Osage trust land in an industrial park. The Osage Nation Food Distribution department is already located in Hominy, adding to the intuitive logistics of this operation. With its dual inspection status from both the State of Oklahoma and USDA, the facility can process custom orders from all ranchers, locally and nationally.

BIRD CREEK FARMS/HARVEST LAND

The next action taken to ensure food security is improvements to Bird Creek Farms/Harvest Land. The farm has been in operation for about five years now. However, it has never been required to produce at the level necessary to ensure food security. The construction of the 40,000 square foot greenhouse, a 44,000 square foot general use building that will include an aquaponics operation, and the purchase of equipment necessary for large-scale farming is to fulfill this unmet need. These facilities will allow for the production of produce year round and will help provide additional nutritious foods for all people in the region, not just Osages.

CASE STUDY

PANDEMIC IMPACT ON THE FOOD DISTRIBUTION PROGRAM ON INDIAN RESERVATIONS (FDPIR) & POLICY CONSIDERATIONS FOR THE FUTURE

The Food Distribution Program on Indian Reservations, or FDPIR—commonly known in Indian Country as "Commods,"—is the only one of the 15 federal food assistance programs administered by USDA that primarily serves American Indian and Alaska Native peoples. Prepandemic, the program served approximately 85,000-90,000 people each month, with citizens of 276 different Tribal Nations relying on the program to meet their needs. FDPIR serves a significant number of children and elders in Tribal communities across Indian Country, with approximately two-thirds of all FDPIR households having children under the age of 18, and about 40 percent of FDPIR households having an elder over the age of 65 in the home. FDPIR has always served some of the most vulnerable people in Tribal communities, but given what we now understand about COVID-19 and the risk of serious illness and death in these populations, individuals served by FDPIR were among some of the most at-risk in Tribal communities. This reality made a food program that provided direct packages of food that could be delivered safely via social distancing even more vital during the pandemic. In contrast, programs like the Supplemental Nutrition Assistance Program (SNAP) require grocery shopping, which can be a high-risk activity for elders during COVID-19.

TRACKING IMPACTS TO THE FOOD DISTRIBUTION PROGRAM ON INDIAN RESERVATIONS (FDPIR)

NAFDPIR released a total of three surveys to ITOs across the country in March and April 2020, tracking various indicators of food insecurity and needs among Indian Tribal Organizations (ITOs). Due to COVID-19 restrictions, all surveys were conducted online, with links sent directly to managers of all FDPIR ITO's by the NAFDPIR Board members. The surveys were designed to track key metrics identified by the NAFDPIR Board. The surveys had excellent response rates. The first survey had a response rate of 60 percent, the second survey had a response rate of 49 percent, and the third survey, which focused specifically on pandemic-related infrastructure needs, had a response rate of 87 percent.

In the first two weeks after the Coronavirus outbreak was declared a pandemic by the World Health Organization, surveys showed that FDPIR participation had risen by 11 percent; that total would rise to approximately 14 percent by the end of March 2020. As pandemic-related workplace closures increased while Tribal governments and other businesses tried to help slow the spread of COVID-19, ITOs certified hundreds of new households; at one point early in the pandemic, over half of all ITOs had certified more than 600 new households for FDPIR. In addition to these new participants to serve, ITO's were also dealing with inventory management issues and trying to source Personal Protective Equipment (PPE) for their employees. New supply costs popped up, such as expenses for boxes and bags to pack food in as ITOs shifted to drive-up service only in an effort to accommodate social distancing and slow the spread of COVID-19. Nearly 60 percent of ITO respondents reported an increase in fuel costs, as ITOs also increased their deliveries to those highrisk participants who had to isolate and could not safely come to a site to pick up food.

Of particular concern to the NAFDPIR Board were inventory levels at ITOs, as supply chain disruption was already impacting local food retailers. The Board was concerned that similar issues would befall FDPIR, especially as early survey results indicated that 80 percent of current FDPIR participants were increasing their take rates of foods: this meant that participants were taking all of a product they were allotted at once instead of spacing it out over the course of the month, which would be more typical.

People were concerned about potential food shortages, and wanted to ensure they had food on hand at home to feed their families. Unfortunately, this initially diminished stock at FDPIR sites, leaving some ITOs in an uncomfortably low stock situation. Over 66 percent of early survey respondents reported they were out of stock at some items, and 43 percent reported lacking some fresh fruits and vegetables. As products went out of stock, this tended to create additional stock shortages for other products. For example, the fresh fruit and vegetable shortages led participants to take more canned fruits and vegetables, reducing those stock numbers at a greater than average rate and creating stock issues for those items as well.

Labor issues also led to slowdowns in restocking food. As COVID-19 cases within Tribal communities began to rise, warehouses began running with fewer and fewer employees because individuals were out due to direct contact with infected persons, or with illness themselves. For Tribes that offer storefront concepts for FDPIR and maintain multiple FDPIR sites across their jurisdictions, this labor shortage meant empty shelves at the FDPIR grocerystyle sites—not because the food products were out of stock, but because there simply were not enough healthy employees to make the usual supply runs that kept stock on shelves. For those employees who were there, some Tribal Nations authorized hazard pay and/or overtime, further increasing administrative expenses: about 40 percent of ITOs reported in the first survey that overtime was an additional immediate expense.

USDA photo by Bob Nichols.

POLICY-DRIVEN CHANGE IN FDPIR PARTICIPATION

Despite continuing need for food assistance throughout Indian Country, the rise in FDPIR participation began to decline when Congress enacted legislation temporarily increasing SNAP benefits. Although USDA had received \$50 million in appropriations to support additional food purchases for FDPIR as part of the COVID-19 response legislation in the CARES Act, USDA declined to issue additional food products to FDPIR in the way NAFDPIR and Tribal leaders initially requested. Instead, USDA initiated a lengthy process to determine how best to utilize these funds, delaying the purchase of additional foods. Unfortunately, these administrative delays, along with additional delays in rolling out the "638" authority for FDPIR that facilitates direct Tribal procurement of foods for FDPIR packages, led to a decline in FDPIR participation in the later stages of 2020, as families on FDPIR chose to utilize SNAP or other food sources to meet their needs. We will never know what might have transpired if USDA had been able to spend those funds more expeditiously, especially in combination with "638" authority that would have enabled Tribal Nations to purchase foods for the program directly from local Native producers. Ultimately, the additional food dollars for FDPIR were some of the last-if not the very last—funds to be spent out of the \$3.4 billion Congress appropriated in the CARES Act, and FDPIR participation dipped to pre-pandemic levels by the end of 2020.

Acknowledging this overall decline in participation nationally, pockets of FDPIR programs continued to see higher numbers. This may be what is indicated in the NAAF survey data above, which show a 214 percent increase in FDPIR participation among NAAF Food Access Survey respondents.

ADDRESSING IMPACTS TO FDPIR: THE KEY ROLE OF TRIBAL LEADERSHIP

The NAFDPIR Board and Tribal leaders in the Tribal Consultation Work Group on FDPIR convened a weekly series of phone calls with USDA officials soon after the onset of the COVID-19. These calls provided a space for Tribal leaders and NAFDPIR to quickly elevate issues like those described above to national USDA leadership, and gave USDA a chance to solve those problems more quickly than they might have if the pre-pandemic reporting structure had been utilized instead. In a normal time, issues like those the ITOs were having would be first reported to FNS Regional Offices, and likely would not be elevated to the level of national office attention.

FDPIR remains a critical stopgap for food insecurity in Indian Country. With so many elders and families with children relying on this program, it is essential that it continue to be operational; the trust responsibility that the federal government owes to Tribal Nations further requires that the services FDPIR provides be of good quality and be driven by the needs of Tribal communities as much as possible.

RECOMMENDATIONS FOR

"A LOCALIZED, NATIVE-LED FOOD SYSTEM Strengthens food security for native American communities."

Data from the NAAF Food Access Survey, bolstered by the stories of Native producers' response to COVID-19, highlight the depth and breadth of hunger in Indian Country and corroborate this notion that when Tribal governments and Native entities are centered in the role of feeding their people and are provided the proper financial and data support – solutions are actualized and objectives are achieved effectively. A localized, Native-led food system strengthens food security for Native American communities. The following recommendations will help ensure Tribal governments and Native producers are centered at the decision-making table regarding feeding their communities moving forward through improvements to agricultural infrastructure, federal nutrition programs, and data collection methods for Native American communities.

AGRICULTURAL INFRASTRUCTURE

Support Native farmers and ranchers growing food with a 20% USDA set aside established for Tribal organizations, Tribal governments, Native non-profits and Native producers in each of USDA's existing program authorities.

This effort would provide proper access to federal programs which increases access to capital and loans, grants, access to resources, crop insurance, and value-added food production. There are significant gaps in Native food security that can be addressed by building infrastructure in Indian Country which will increase rural prosperity as a whole. The federal government spends billions of dollars on Native nutrition programs as part of their responsibility to Tribes. If Native farmers and ranchers are also supported by this responsibility, food security, nutritional needs, economic viability, and prosperity of Native people and communities can be increased.

Support infrastructure and broadband in Tribal communities by mandating a 20% set aside of all rural broadband programs delivered to benefit Native farmers and ranchers and food system producers.

Tribes do not have the tax base or capital for building out the necessary infrastructure to support an increase in food system production by Native farmers and ranchers. Building out an agricultural infrastructure would feed more Native people with nutritious foods, enhance food security, add community jobs, increase rural prosperity, create opportunities that would strengthen food system resilience. Broadband is needed for Native farmers and ranchers to successfully manage the day-to-day business operations. Access to banking, technology, information and resources is critical for success. Broadband is also essential to bridge the gap between food producers and the people who need food.

FEDERAL NUTRITION PROGRAMS

Enable Tribal governments to administer all federal nutrition programs.

USDA can take administrative actions to support Tribal self-determination in all federal nutrition assistance programs, even without a statutory requirement from Congress, including a full and robust implementation of Tribal waivers as required by Section 6 of Executive Order 13175. This provision facilitates waivers of discretionary, statutory, or regulatory provisions where they would significantly support Tribal sovereignty and reduce barriers to equity at USDA for Tribes. This provision is underutilized across all federal departments. Because of their Office of Tribal Relations within the Office of the Secretary, USDA is well-positioned to lead federal departments in improving federal acknowledgment of Tribal sovereignty by enhancing Tribal use of this provision. To do this, USDA's Office of Tribal Relations should work directly with the USDA Office of General Counsel to determine a simplified process and procedure for Tribes to follow in applying for and receiving these waivers. The waivers would provide Tribes flexibility in administration of federal nutrition programs including additional opportunities for Tribally sourced, culturally appropriate foods as well as culturally relevant program delivery, all of which would support increased food security in Indian Country.

For the Emergency Food Assistance Program (TEFAP), Tribal governments are not listed as eligible administrators of the program or as recipients of the foods in the program, unless they are approved by state governments. Congress should further uphold Tribal sovereignty in food assistance programming by amending Section 27 of the Food and Nutrition of 2008 to enable Tribal governments and ITO's to administer TEFAP. This oversight in the law prohibits Tribes from accessing this additional food security program that could provide a safety net in times of crisis, as well as additional opportunities for local Tribal food sourcing.

For programs that can currently be administered by Tribal governments, the Tribal governments may have to apply to the state and sometimes two or three separate state governments if the Tribal government spans multiple state borders. This is unacceptable as Tribal governments' relationships to the U.S. government are at the federal level, therefore the requirement for state government approval should never be in place. Additionally, Congress should give full authority to Tribal governments to function as government agencies in administering the federal nutrition programs. Tribal governments do not currently have the authority to administer the federal nutrition programs except for FDPIR, Temporary Assistance to Needy Families (TANF), the Commodity Supplemental Food Program (CSFP), and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). In accordance with Tribal sovereignty, Tribal governments should have the right to choose to administer all federal food programs like SNAP and the child nutrition programs, including school meals, summer meals, and CACFP. This is critically important for recognizing Tribal sovereignty and would ease the administrative burden on tribes, like the Navajo Nation, that straddle multiple states and must coordinate with multiple state agencies to provide school meals.

Allow Tribal organizations to expand Native-grown and culturally relevant food procurement options in federal nutrition programs.

Current FDPIR and child nutrition procurement rules, and WIC vendor rules create significant barriers to local, traditional, or Native-produced foods, favoring large producers and excluding Tribal producers. USDA should create easier pathways for Native farm products to be included in FDPIR, school meal and out-of-school time meal programs, and the Tribal child care programs (including Head Start). USDA should also streamline processes for Native producers to become WIC vendors redeeming the WIC fruits and vegetables benefits.⁷⁸

Food Distribution Program on Indian Reservations

Part of the supply chain issue with fresh produce during the pandemic could have been solved had there been better existing pathways for Native vendors to provide foods to federal nutrition programs, particularly fresh fruits and vegetables and/or traditional and culturally appropriate foods. These are policy changes Tribal leaders have asked for in consultation with USDA. Some solutions require statutory change, but USDA could see positive outcomes immediately by taking administrative action within the scope of the Department's existing legal authority. For example, USDA could direct the Agricultural Marketing Service (AMS) to partner with intertribal organizations like the Intertribal Agriculture Council (IAC) to provide the technical assistance and training that ensures more Native-owned businesses can be vendor-certified, with benchmarks for this set by NAFDPIR and the Tribal Leaders Consultation Working Group on FDPIR.

Strengthen and expand the federal nutrition programs

Congress and USDA should strengthen and expand the federal nutrition programs by streamlining access, enhancing benefit adequacy, and improving benefit redemption options for Native American households. This should include making permanent key flexibilities offered during COVID-19 that eliminated long standing barriers to participation in Tribal lands, such as universal eligibility for many child nutrition programs, and remote services and benefits issuance for SNAP and WIC. Congress should invest in making those flexibilities and innovations permanent including ensuring nutritious school meals free of charge during the school year and summer EBT to purchase meals when school is out during the summer break. In addition, Congress should expand the food programs to provide a full complement of meals each day for the children in every Native American community depending on the meals in child care programs. The recent expansion of SNAP benefits is important but further enhancements are warranted.

Support a robust FDPIR program with parity to other programs to help ensure equitable, adequate food access.

FDPIR is the only commodity food program that cannot be used in conjunction with SNAP benefits. This outdated incongruity should be amended to allow participants to use benefits from FDPIR and SNAP within the same month. This will help generate consistency between FDPIR and other commodity food programs.

Additionally, for relevant benefit enhancements made to SNAP, USDA and Congress need to ensure there is a congruent change made to FDPIR. When benefit enhancements are made to SNAP that are not made equitably for FDPIR, this has a negative impact on FDPIR and the service Tribal citizens receive through that program. USDA should work proactively with Tribal leadership and NAFDPIR to implement equitable changes in FDPIR.

SNAP and FDPIR are interrelated because the programs are billed as alternatives to one another. By law, a person who qualifies for both cannot legally utilize both programs in a single month. When SNAP receives additional benefits and FDPIR does not, participation in FDPIR declines for the duration of the additional SNAP benefits, only to rise sharply again when those SNAP benefits end. When presented with solutions that would facilitate enhanced FDPIR benefits, USDA should work to implement them in a timely way so as not to negatively impact FDPIR, which primarily serves Tribal citizens, while also speeding along SNAP reforms. Collect and fully utilize race and ethnicity data for American Indian and Alaska Native individuals in the federal nutrition programs.

USDA should create a more comprehensive and timely system of collecting and fully utilizing race and ethnicity data in the federal nutrition programs. The reliable and timely collection of race and ethnicity data across programs is essential to deliver resources equitably to Native American communities. Collecting missing race and ethnicity data can be a sensitive issue. Filling in missing race and ethnicity data by visually identifying a person's race or ethnicity is a civil rights issue because of the risk for misclassification. Racial misclassification can disproportionately impact Native American children. Recently, USDA took the important step of eliminating the process of program operators visually identifying children's race, ethnicity, or both as a back-up measure when forms were not completed. This creates an opportunity to improve the system for collecting this information.

To inform equitable policy strategies in the federal nutrition programs, several shortfalls need to be addressed. The new, more comprehensive system should produce reliable data in a timely manner that can be used to evaluate coverage rates, site locations, service discrimination, and other civil rights and equity issues.

To further actionize this recommendation, USDA should integrate an Indigenous Evaluation Model into research requirements and protocols including:

- centering the lived expertise of community members whose needs are being addressed so that program design and evaluation reflect their needs and values, rather than relying on external, non-Tribal evaluators;⁷⁹
- using an assets-based approach, rather than a deficits-based approach, to program evaluation;⁸⁰ and
- agencies should train Tribal members to be evaluators, researchers, and program staff to "design and implement evaluation on their own." ⁸¹

DATA COLLECTION

Mandate and fund food security data collection and reporting for American Indian and Alaska Native peoples in the annual Current Population Survey Food Security Supplement and other government surveys.

As discussed earlier, there is no current, comprehensive, ongoing measure of food security among Native American households. Due to small sample sizes, American Indian and Alaska Native populations are reported in aggregate with other smaller populations as an "other" category. During COVID-19, this remains true as the U.S. Census Bureau Household Pulse survey does not report data for American Indian and Alaska Native peoples nor can the data be easily disaggregated for this population.

Absence of data for Native American communities is related to federal and state data agencies and policy makers and administrators failing to secure meaningful data either by direct contact with Urban Indian health agencies or direct coordination with Tribal governments or Native food security experts. We offer the following recommendations to help remedy this issue.

USDA's Racial Equity Commission, as well as an interagency task force can help to address issues of data collection and reporting. A mandate and increased funding for research on food insecurity and sovereignty among American Indian and Alaska Native communities is necessary. USDA and the Census Bureau annual, as well as periodic surveys should include sampling frames sufficient to generate representative estimates for Native American populations. This includes the annual Current Population Survey Food Security Supplement and the Household Pulse Survey food insufficiency data. Consideration should also be given to including a food insecurity in Tribal lands module in the Census of Agriculture conducted every five years by the National Agricultural Statistics Service. Commission an interagency task force to address issues of data collection, reporting and center Native-led organizations and epidemiology centers as key drivers in collecting data for Native communities.

Implementation of culturally appropriate methods of researching and collecting accurate data on issues like household food insecurity is critical and achievable, particularly when the authority to collect that data is vested in the hands of Native researchers. Native-led organizations and epidemiology centers need to be anchored as key players in collecting data. Due to the established, trusted relationships between Native-led organizations, Tribal governments, and the Native peoples they serve, having these entities leading data collection will generate a more accurate insight to hunger, food access, and budgetary needs of federal feeding programs that serve Tribal communities.

The development of a task force that upholds interdepartmental linkages in federal nutrition programs and can oversee the proper advocacy of the food insecurity data for Native American households has the potential to make positive impacts. Additionally, USDA should support researchers from Native-led organizations and Tribal governments and engage Native communities in design, planning and implementation of data collection.

CONCLUSION

As a result of systemic racism and conscious unmet obligations by the federal, state and local U.S. governments, community food deficits are a pervasive fact of life, persisting for centuries for America's first citizens. NAAF's Food Access Survey launched in February 2021, revealed the extent of this issue during COVID-19 while highlighting the gap in federal surveys in assessing food insecurity among Native Americans. Survey results showed far too many Native American households experience food insecurity and food access challenges. One half of respondents experienced food insecurity during COVID-19 and 25 percent experienced very low food security.

Indian Country persisted in doing what they have been doing for centuries, forging a resilient and robust response to systematically created hardships.

The survey also highlighted shifts in the places, organizations, and programs respondents used to procure foods during COVID-19. We found that despite the vast and disproportionately large hunger and health impacts that COVID-19 imposed on Native communities, Indian Country persisted in doing what they have been doing for centuries, forging a resilient and robust response to systematically created hardships. In the face of food supply chain disruptions, rising hunger, and surging COVID-19 cases, Native-led organizations launched into action to make sure community members that are most at risk for adverse outcomes were supported.

Paralleling this research study were the food stories of Native-led grassroots efforts mobilizing across Indian Country, catalyzing efforts to feed people, oftentimes going a step further in creating sustainable changes in their food systems. From every corner of Indian Country examples and acts of cohesiveness and collective action inspire us to move forward in new and exciting ways. Now is the time to build a cohesive response to shortcomings of the federal government to ensure that this never happens again. This will require putting Tribal governments in the driver's seat of feeding people because they have the knowledge, wisdom, assets, and resources to do so.

Appendix A: Survey Respondent Characteristics

Individual Characteristics	
Gender	
Female	290 (74%)
Male	96 (24%)
Two-Spirit	5 (1%)
Age	
Average Age in Years (range)	49 (19-80)
Marital Status	1
Married	180 (46%)
Domestic Partnership	37 (9%)
Widowed	18 (5%)
Divorced or Separated	55 (14%)
Single or Never Married	102 (26%)
Highest Education	
Less than high school	5 (1%)
Some high school (no diploma)	3 (1%)
High school graduate or equivalent (e.g. GED)	36 (9%)
Some college, degree not receive or in progress	114 (29%)
Associate's degree (e.g. AA, AS)	65 (17%)
Bachelor's degree (e.g. BA, BS)	98 (25%)
Graduate degree (e.g. master's professional, doctorate)	70 (18%)
Household Characteristics (selections are not mutually exclusive)	1
Average number of individuals per household	3.8
Household with Children under 5	97 (20%)
Households with Children 5 to under 18	227 (47%)
Households with Children under 18	252 (50%)
Household with Adults 50 and older	222 (46%)
Households with Adults 65 and older	144 (30%)
Employment & Income	
Income	
Median Household Income	\$35,000-\$50,000
Employment Disruptions During COVID-19 (selections are not mutually exclusive)	
Household Member had Job Loss During COVID-19	91 (23%)
Household Member had Reduced hour or Income at job in household during COVID-19	117 (30%)
Household Member was Furloughed During COVID-19	37 (10%)
Household Member did not have Any Changes in Job During COVID-19	176 (45%)
Place of Residence	
Currently reside on a Tribal Reservation	343 (68%)
Currently do not reside on a Tribal Reservation	161 (32%)

Appendix B: Food Insecurity Among Native American or Alaska Native Survey Respondents

Population	Total Respondents		ood urity		ood curity		Food curity	Fo	/ Low bod curity
	n	n	%	n	%	n	%	n	%
All	437	221	50.6%	216	49.4%	108	24.7%	108	24.7%
Individual Characteristics									
Female	290	154	53.1%	136	46.9%	63	21.7%	73	25.2%
Male	96	49	51.0%	47	49.0%	27	28.1%	20	20.8%
Two-Spirit	5	3	60.0%	2	40.0%	1	20.0%	1	20.0%
Fair or Poor Self-Reported Health Status	161	58	36.0%	103	64.0%	42	26.1%	61	37.9%
Good, Very Good, or Excellent Self-Reported Health Status	233	148	63.5%	85	36.5%	51	21.9%	34	14.6%
Household Composition									
Children under age 5 in household	87	36	41.4%	51	58.6%	22	25.3%	29	33.3%
Children under 18 in household	229	101	44.1%	128	55.9%	58	25.3%	70	30.6%
No children under 18 in household	208	120	57.7%	88	42.3%	50	24.0%	38	18.3%
Adult 65 or older in household	131	71	54.2%	60	45.8%	29	22.1%	31	23.7%
No adult 65 or older in their household	306	150	49.0%	156	51.0%	79	25.8%	77	25.2%
Employment									
No disruption in employment during COVID-19	174	115	66.1%	59	33.9%	38	21.8%	21	12.1%
Disruption in employment during COVID-19	215	88	40.9%	127	59.1%	53	24.7%	74	34.4%
Residence									
Reside on Tribal lands	304	153	50.3%	151	49.7%	80	26.3%	71	23.4%
Does not reside on Tribal lands	133	68	51.1%	65	48.9%	28	21.1%	37	27.8%
Food Access (miles to the nearest grocery store from residence)									
10 or Fewer	197	103	52.3%	94	47.7%	42	21.3%	52	26.4%
Greater than 10	185	100	54.1%	85	45.9%	45	24.3%	40	21.6%
20 or Fewer	272	148	54.4%	124	45.6%	61	22.4%	63	23.2%
>20 to 40	57	29	50.9%	28	49.1%	13	22.8%	15	26.3%
>40	53	26	49.1%	27	50.9%	13	24.5%	14	26.4%

Appendix C: Proximity To Nearest Grocery Store

Distance to Nearest Grocery Store (miles)				
	Number of respondents (percent)			
1 or fewer miles	11 (2.9%)			
5 or fewer miles	124 (32.5%)			
10 or fewer miles	197 (51.6%)			
15 or fewer miles	244 (63.9%)			
20 or fewer miles	272 (71.2%)			
40 or fewer miles	329 (86.1%)			
100 or fewer miles	378 (99%)			
	Average (range)			
Average distance for all respondents	17.2 (0-190)			
Average distance among respondents that live on Tribal Lands	21.7 (0-190)			
Average distance among respondents that do NOT live on Tribal Lands	7.4 (0-60)			

Appendix D: Places, Programs, and Organizations Used to Obtain Food Before and During COVID-19

Appendix D1. Places Used to Obtain Food Before and During COVID-19

	Before COVID-19		During C	Percentage	
Place	(March 2019 - I	March 2020)	(March 2020	Change from Before to	
Tidde	number	percent	number	percent	During COVID-19
Food Procurement Places (n=397))				
Grocery store (supermarket, large bulk stores)	348	88%	309	78%	-11%
Convenience store, gas station, corner store	124	34%	129	35%	4%
Specialty store (ethnic market, co- op, health food store)	127	32%	75	19%	-41%
Grocery delivery (like Instacart, Amazon, or curbside grocery pickup)	23	6%	135	34%	487%
Eat-in Restaurant/Cafeteria	261	66%	64	16%	-75%
Restaurant To-Go (Drive through, take-out, delivery, curbside pickup)	196	49%	244	61%	24%
Local Farm (farm stand, farmer's market, local farm)	208	52%	104	26%	-50%
Food Pantry and Food Bank	59	15%	175	44%	197%
Shelter or Soup Kitchen	4	1%	11	3%	175%

Appendix D2. Programs Used to Obtain Food Before and During COVID-19

	Before COVID-19		During C	Percentage Change from Before to	
Program (March 2019 - March		March 2020)	(March 2020 - April 2021)		
4	number	percent	number	percent	During COVID-19
Food Assistance Programs (n=395)					
SNAP	56	14%	79	20%	41%
WIC	28	7%	26	7%	-7%
FDPIR	43	11%	135	34%	214%
Meals on Wheels	8	2%	12	3%	50%
Elder Lunch Program or Elder Congregate Meals Programs	38	10%	38	10%	0%

School Meals or other Child Nutrition Programs (among Native respondents that live in a household with children, n=252)	81	32%	134	53%	65%
School Meals or other Child Nutrition Programs	82	21%	140	35%	71%

Appendix D3. Organizations Respondents Received Food Assistance from Before and During COVID-19

Organization	Before Co (March 2019 -		During C (March 2020	Percentage Change from Before to During COVID-19	
e.	number	percent	number percent		
Organizations Providing Food Assistance (n=395)					
Tribal Governments	32	8%	186	47%	481%
Tribal-Led Organizations	23	6%	159	40%	591%
Local Farmers	21	5%	115	29%	448%
Faith Based Organizations	22	6%	68	17%	209%
Other Community Programs	20	5%	108	27%	440%

Appendix D4. Local Food Sources Used to Obtain Food Before and During COVID-19

	Before COVID-19		During C	Percentage	
Local Food Source	(March 2019 - March 2020)		(March 2020	Change from Before to	
	number	percent	number	percent	During COVID-19
Local Food Procurement (n=395)					
Farmers' Markets	231	58%	77	19%	-67%
Farm Stand	105	27%	43	11%	-59%
Ranching and Farming	101	26%	83	21%	-18%
Community Garden	82	21%	65	16%	-21%
Home Garden	149	38%	177	45%	19%
Fishing	137	35%	113	29%	-18%
Foraging and Seed Collecting	91	23%	97	25%	7%
Hunting	176	45%	157	40%	-11%
Sharing or Trading Food	114	29%	155	39%	36%

Abenaki Acoma Acoma Acoma Acoma Acoma Acoma Acoma Acoma pueblo Acoma pueblo and Tohono O'odham Alabama-Coushatta Anishinaabe ApsÃjalooke Crow Assiniboine & Sioux Tribes of Montana Assiniboine/Nakoda - Fort Belknap Indian Community **Bag mills Indian** community **Bay Mills Bay Mills Indian** Community **Bishop Paiute Tribe Bitterroot Salish** Blackfeet Blackfeet Blackfeet Blackfeet Blackfeet Blackfeet Blackfeet and CSKT Blackfeet and Urban Indian Blackfeet Nation Bois Forte Band of Chippewa Browning, Montana Catawba

Cayuse/Umatilla, Warm Springs, Yakama, Nez Perce Cherokee Cherokee Cherokee Cherokee Cherokee Cherokee Cherokee Indians of Robeson and Adioining Counties, Lumbee, Waccamaw, Meherrin, Chownoke, Tuscarora and all NC Tribes Cherokee Nation Cherokee Nation Cherokee Nation Cherokee Nation Cherokee, Ottawa, Miami Cherokee, Muskogee Chevenne **Cheyenne River Sioux** Tribe **Chevenne River Sioux** Tribe Chevenne River Sioux Tribe - Whitehorse, SD Chickasaw Chippew Cree Rocky Boy Chippewa cree Chippewa Cree Chippewa Cree Tribe Chippewa Cree Tribe Chippewa/Cree Chippewa-Cree Chippewa-Cree/ Assinaboine Chiricahua Apache Chistochina and Kake Choctaw Choctaw nation

Choctaw nation of Oklahoma CHOCTAW NATION OF OKLAHOMA Chui Chu Cochiti Pueblo Coharie Inter-Tribal Council and Lumbee Tribe of NC Colorado river Colville & Spokane Colville Confederated Tribes Colville Confederated Tribes, Spokane Tribe Colville Tribe and Hoonah Indian Association Colville tribes Colville, Metis Colville/ Lummi Comanche confederated salish & Kootenai Confederated Salish & Kootenai Confederated Salish & Kootenai Tribes confederated Salish and Kootenai tribe Confederated Salish and Kootenai Tribes Confederated Salish and Kootenai tribes

Confederated Salish and	Crow reservation -	Fort McDermitt
Kootenai Tribes	Montana	Fort McDermitt Paiute
Confederated Salish and	Crow Tribe	Fort McDermitt Tribe
Kootenai tribes	Crow Tribe	Fort peck assiniboine
Confederated Salish and	Crow Tribe of Indians	sioux
Kootenai Tribes &	CRST	Ft Peck Assiniboine &
Oklahoma Band Choctaw	CRST	Sioux Tribes
Confederated Salish and	CSKT	Gila River Indian
Kootenai Tribes of the Flathead Nation	CSKT	Community
Confederated Salish	CSKT	Gila River Indian
Kootenai Tribe	CSKT	community
Confederated Salish	CSKT	Ho-Chunk
Kootenai Tribes	CSKT	Ho-Chunk Nation
Confederated Salish	CSKT	Hoopa Valley Tribe
Kootenai Tribes	CSKT	Норі
Confederated Salish	CSKT	Норі
Kootenai Tribes Ronan Community	CSKT	Норі
Confederated Tribes &	CSKT	Норі
Bands of the Yakama	CSKT St.Ignatius	Норі
Nation	CTUIR	Норі
Confederated Tribes of the	CTUIR	Норі
Colville Reservation,	CTUIR - Umatilla	Норі
Arrow Lakes Band	Dakota	Норі
Confederated Tribes of the Umatilla Indian	Descendant of Towa tribe	Норі
Reservation	but live in Pomo Territory	Норі
Confederated Salish &	so mostly Pomo	Норі
Kootenai Tribes	Diné	Норі
Coushatta Tribe of	Diné (Navajo)	Норі
Louisiana	Eastern Band Cherokee	Норі
Cow Creek Band of	Eastern Band of Cherokee	Норі
Umpqua Tribe of Indians	Indians	Норі
creek	Flathead	Норі
Creek/Cherokee	Flathead Indian	Норі
Crerk	Reservation-Arlee, Mission, &	Норі
Crow	Ronan, Montana	Норі
Crow	communities	Норі
Crow	Fort Belknap	Норі
crow	Fort Belknap Gros Ventre	Норі
Crow and Fort Belknap	Fort Belknap Nakoda	Норі
Reservations	Fort Belknap Nakoda	Норі
Crow Indians		

Hopi Hopi Hopi Nation Hopi Tribe Hopi Tribe Hopi Tribe Hopi Tribe Hopi Tribe Hopi Tribe HOPI. LOWER MOENCOPI Hopi/Lakota HOPI/TEWA, ARIZONA Jemez Jemez Nation Jemez Pueblo Jemez pueblo Jemez Pueblo Jemez Pueblo Jemez pueblo Jemez Pueblo Kanatak/Pilot Point Kanatak/Pilot Point **KBIC** Kbic **KBIC KBIC KBIC** Kbic Keller Ketchikan Indian Community, Haida Nation, Tlingit and Hsida Keweenaw Bay Keweenaw Bay Indian Community Keweenaw Bay Indian Community Kickapoo / Seminole / Muscogee Kipnuk

Klamath Klamath & Grand Ronde Klamath & Grand Ronde Klamath Tribes Kootenai Kootenai Kootenai Kootenai Ksanka Ksanka Lac Courte Oreilles Lac Courte Oreilles Laguna Pueblo Lhaq'temish Little shell Chippewa Little Shell Tribe Little Traverse Bay Band & Grand Traverse Band of Ottawa & Chippewa Indians Little Traverse Bay Band & Grand Traverse Band of Ottawa & Chippewa Indians Little Traverse Bay Bands of Odawa Indians Little Traverse Bay Bands of Odawa Indians Lumbee Lumbee Lumbee Lumbee Lumbee Cheraw Lumbee Tribe of North Carolina Lumbee. Robeson County Lummi Lummi Lummi Lummi Lummi Nation

Lummi nation Lummi Nation Lummi Nation Tribes Ma-Chis Lower Creek Indian Tribe of Alabam Makah Makah Mandan Hidatsa Arickara Mandan Hidatsa Arickara Manzanita Mesa Grande Band of **Mission Indians** Mescalero Apache Meskwaki Metis Metlakatla Indian Community Modoc Nation Moencopi (Lower), the Hopi Tribe Muckleshoot Muscogee (Creek) Muscogee (Creek) Muscogee Creek & Poarch Creek (displaced) Muscogee. Creek Muskogee creek nation Navajo Navajo

Navajo Navajo Navajo Navajo Navajo Navajo Navajo Navajo Nation Navajo Nation Navajo Nation Navajo Nation Navajo Nation Navajo Nation/Naatsis'Aan (Navajo Mountain) Utah & Az. Navajo tribe Navajo, White Mountain Apache Nez Perce Nez Perce Nooksack Northern Cheyenne Tribe Northern Cheyenne Tribe Northern Cheyenne, Crow Oglala Lakota Omaha Tribe of Nebraska Oneida Nation of Wisconsin **Oneida Nation WI** Oneida, Bad River Ojibwe **Open-Ended Response** Osage Osage Osage Osage Osage **Osage Tribe** Paiute Paiute/Shoshone Passamaguoddy

Pawnee Pawnee Pawnee & Seminole Penobscot Penobscot Penobscot Nation Peoria Tribe of Indians of Oklahoma petersburg alaska **Piscataway Conoy Tribe** Please list the American Indian or Alaska Native community (communities) you identify with. Pomo Pomo/ Lakota Ponca and Pawnee Port Gamble S'Klallam Tribe pueblo Pueblo Pueblo de San Ildefonso Pueblo of Acoma Pueblo of Acoma Pueblo of Acoma Pueblo of Acoma Pueblo of Jemez Pueblo of Laguna Pyramid Lake Paiute Tribe Quapaw Quapaw Quinault Chinook and hoh Quinault indian reservation Raramuri, Tigua, Mexica Red Cliff Band of Lake Superior Chippewa

Red Cliff Band of Lake Superior Chippewa Red Lake Band of Chippewa Indians Red Lake Band of Chippewa Indians Red Lake band of Chippewas Red Lake Nation Red Lake Ojibwe **Rosebud Sioux Tribe** Rosebud Sioux Tribe Round Valley Indian Tribes: Concow and Little Lake Pomo Saginaw Chippewa Tribe Saginaw Chippewa Tribe saginaw chippewa tribe of michigan Salish Salish Salish Salish - Part of Confederated Salish and Kootenai Tribes Salish & Kootenai salish kootenai Salish kootenai Salish Pend Oreille Salish, Flathead Reservation Salish, Kootenai Salish-Kootenai and Colville San Carlos Apache San Carlos Apache Santa Clara Pueblo Santa Clara Pueblo Santee Santee Sioux Nation Santee/Sisseton-Wahpeton Dakota

Saul Ste Marie Tribe **Chippewa Indians** Saul Ste Marie Tribe oh **Chippewa Indians** Sault St. Marie Chippewa Sault Ste Marie Tribe of **Chippewa Indians** Sault Ste. Marie Tribe of **Chippewa Indians** Sault Tribe Sault Tribe Chippewa Sault Tribe Chippewa Saxman village, Alaska Seneca Seneca Nation of Indians Shawnee Tribe Sherwood Valley Shoshone Bannock Tribe of Idaho Shoshone Paiute Tribes **Duck Valley Reservation** Shoshone, Paiute and, Pit River Shoshone-Bannock Tribes Sisseton Wahpeton Sisseton Wahpeton Dakota Sisseton Wahpeton Oyate Spirit Lake Spirit Lake Spirit Lake Dakota Spirit lake nation Sioux tribe Spirit lake sioux Spirit Lake Sioux Spirit lake sioux tribe Spirit Lake Tribe Spirit Lake Tribe Spokane Spokane Tribe Spokane Tribe

Spokane Tribe Spokane Tribe Spokane Tribe Spokane Tribe of Indians Spokane, Colville **Confederated Tribes** Spokane/Yakama Tribes Squaxin Island Tribe Standing Rock Sioux Tri be North and South Dak ota Standing Rock Sioux Tri be North and South Dak ota Standing Rock Sioux Tri be North and South Dak ota Standing Rock Sioux Tribe Stockbridge-Munsee Community Stockbridge-Munsee Community Suguamish SW Dine' Taos Pueblo and Jemez Pueblo Temoak Tribe Western Shoshone Tempal The Confederated Salish and Kootenai Tribes The Klamath Tribes this one Tlingit Tlingit Tlingit, Southeast Alaska Tlingit/Juneau TMBCI TO Nation Tohono O'odham Tohono O'odham Tohono O'odham Nation

Tolowa Deeni'Nation Tuba city Tuba City AZ Turtle Mountain Turtle Mountain Turtle Mountain Turtle mountain Band of chippewa Turtle Mountain Band of Chippewa Indians Turtle Mountain Band of Chippewa Indians Turtle Mountain Chippewa Turtle Mountain Ojibwe Tututni descent, enrolled w Tolowa Dee-ni' Nation UmoNhoN (Omaha) Utu Utu Gwaitu Paiute Tribe. Benton Paiute Reservation Walker River Paiute Walker River Paiute Tribe Warm Springs **Confederated Tribes** Washoe Tribe of NV and CA Wellpinit WHITE EARTH White Earth Band Of Oiibwe White Earth Chippewa Reservation

White Earth Chippewa, Blackfeet, Cherokee White Earth Nation White Earth Nation MN White Earth Ojibwe White Earth Reservation White Earth Reservation White Earth Tribe White mountain Apache Wind River reservation Wind River Reservation -Northern Arapaho Winnebago Winnebago Tribe of Nebraska WRPT-Agai Diccutta Wukchumni Yokuts Wyandotte Yakama Nation Yakama, Pawnee, Otoe, Arapaho Yerington Paiute Yo'eme Yurok Zuni Zuni Pueblo Zuni Tribe Zuni Tribe of the Zuni Indian Reservation

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