



INTERTRIBAL AGRICULTURE COUNCIL

PO BOX 958, BILLINGS, MT 59103

September 12, 2025

The Honorable Lisa Murkowski
Chairman
U.S. Senate Committee on Indian Affairs
838 Hart Senate Office Building
Washington, D.C. 20510

Dear Chairman Murkowski:

Thank you for your leadership in supporting Tribal youth, families, and communities and for this opportunity to provide comment on your landmark legislation, The Native Children's Commission Implementation Act of 2025.

The Intertribal Agriculture Council (IAC) was formed by a coalition of federally recognized Tribes in 1987 to pursue and promote the conservation, development, and use of Tribal agriculture resources. Guided by our member Tribes, IAC provides tailored, on-the-ground technical assistance and services to Tribal producers (including Tribes with agricultural operations and individual Tribal members whose operations contribute to their Tribal economies) and policy advocacy. In addition, IAC has dedicated programs for Tribal youth including agriculture internships with Tribes, grants for food and agriculture projects, and other professional development and educational opportunities.

Food, agriculture, and land management are deeply intertwined with the health and wellbeing of Tribal children, youth, and families. Food is not just sustenance: it is culture, tradition, health, education, land stewardship, jobs, and economic opportunity. The following recommendations aim to better support Tribal children, youth, and families by (1) bolstering access to agricultural and land data, (2) improving integration of Traditional Ecological Practices in land and agriculture management, (3) increasing access to fresh, high quality, Tribal-produced foods, as well as to traditional foods in Tribal communities, and (4) strengthening child and youth programs on agriculture, natural resources, food, and nutrition.



The current aims of the bill are expansive, but the recommendations herein are intended to ensure the aims of the bill in relation to food and health in Indian Country can be actualized when passed into law. That is, there must be support for real food production and the food producers in Indian Country to meet the visionary goals of this bill—purchase power must be accompanied by production power, which includes infrastructure, data, conservation and other critical components to build a strong food system to support Tribal communities.

Comments on Title III - Improving Research and Data

Sec. 301. Office on Native Children; National Clearinghouse on Native Children

IAC supports the establishment of an Office of Native Children and a National Clearinghouse on Native Children. While the U.S. Department of Agriculture (USDA) has a number of programs specifically for or available to Tribal youth, including Farm Service Agency Youth Loans¹, the Federally Recognized Tribal Extension Program², summer programs and internships³, and nutrition programs for Tribal families and youth⁴, information about resources and programs are scattered and sometimes out of date.

To improve the Office of Native Children and the National Clearinghouse on Native Children, IAC makes the following recommendations:

- **Recommendation 1:** Revise the duties of National Clearinghouse on Native Children to include establishing consistent, government-wide criteria for agencies sharing data with the Clearinghouse.
 - This provision should make clear that the Clearinghouse will collect data on both programs that are exclusive to Tribes and Tribal members (e.g. FRTEP) and programs for which Tribes and Tribal members are eligible to participate in (e.g. Supplementary Nutrition Assistance Program). Consistent criteria for inclusion is critical. According to Government Accountability Office (GAO) Report 22-104602⁵, the Office of Management and Budget's Native American Crosscut, which purports to provide comprehensive reporting on federal obligations to Tribes and Tribal members, lacks detail on "what the data from each agency represent—including differences in agencies' methodologies for selecting programs to include and differences in the types of data reported across agencies." As a result, for example, USDA only reports data on programs specific to Tribes in the Crosscut, even though Tribes and Tribal members make use of a large number of USDA programs, including FSA loans, Rural Development (RD) programs, and Food and Nutrition Service (FNS) programs. For Tribal

¹ USDA FSA, *Youth Loans* (last visited Sept. 2025), <https://www.fsa.usda.gov/tools/informational/fact-sheets/youth-loans-2024>

² USDA Nat'l Inst. of Food and Health, *Federally Recognized Tribe Extension Program* (last visited Sept. 2025), <https://www.nifa.usda.gov/grants/programs/nifa-tribal-programs/federally-recognized-tribes-extension-program>.

³ USDA APHIS, *Opportunities for Native Youth* (July 2025), <https://www.aphis.usda.gov/opportunities-native-youth>.

⁴ USDA FSA, *Assistance for Native Americans* (last visited Sept. 2025), <https://www.fns.usda.gov/assistance-native-americans>.

⁵ U.S. Gen. Accounting Office, GAO-22-104602, *Tribal Funding: Actions Needed to Improve Information on Federal Funds That Benefit Native Americans* (May 19, 2022), <https://www.gao.gov/products/gao-22-104602>.



agriculture serving institutions such as IAC, the lack of comprehensive data creates challenges in obtaining an accurate picture of programming that is, and importantly, programming that is not reaching Indian Country. Further, the data collected needs to clearly reflect programming reaching federally recognized Tribes, trust lands, and members enrolled in federally recognized Tribes.

- **Recommendation 2:** In addition to Tribal liaisons, ensure the National Clearinghouse on Native Children has liaisons with all relevant Federal departments, including the USDA, to ensure comprehensive review and inclusion of all federal programs serving Tribal youth and families.

Sec. 302. Interagency Committee on Indigenous Data Sovereignty and Traditional Ecological Practices

IAC generally supports efforts of the federal government to advance Tribal data sovereignty and to integrate traditional ecological practices into federal programs. However, IAC believes that Tribal data sovereignty and traditional ecological practices are distinct — though related — issues that would be best served by separate committees with their own responsibilities.

Tribal Data Sovereignty

As a preliminary matter, the term Indigenous, as used in the draft bill, is ambiguous. The IAC would urge an amended version of the bill to clearly identify data sovereignty in relation to the 574 federally recognized Tribes to which the United States has a trust relationship. Ambiguity in the term Indigenous—without clearly defining the parameters of Indigenous in relation to federally recognized Tribes—risks conflating race-based associations with the sovereignty that belongs to Tribal Nations with their own land bases and jurisdictions, their own economies and their own citizens. Further, the term used, if not clearly defined to reference federally recognized Tribes, will result in skewed data. As discussed more fully below, lack of understanding about what federally recognized Tribes are across all federal agencies results in data that is not based on Tribes as sovereigns, leading to less than precise understanding of how federal programs, such as those at USDA, are actually reaching Tribal communities.

As sovereign nations, federally recognized Tribes have the right to control their own data, including the collection, distribution, and sharing of data. For agriculture and natural resource management, that data might include soil health, vegetation and wildlife inventories, natural resources, land usage, and traditional or culturally important plants — in addition to traditional ecological practices.

In practice, Tribes often lack access to agricultural and land data on trust lands, stymying agricultural development and effective land management. The U.S. Census of Agriculture, which provides key data on the state of the nation's farms, ranches, and producers, and informs USDA programming and funding, only reports select data on producers who self-identify as American



Indian or Alaska Native⁶ and select data on farms located within Indian Reservations⁷. These resources provide an incomplete picture on the agricultural operations of members of federally recognized Tribes — a political designation distinct from self-identification as a member of a racial group — on and off reservation lands. Elsewhere, the Census combines data on farming on American Indian reservations with data on “estate or trust, *prison farm*, grazing association” and other⁸, based on USDA categorizing farms by legal status for federal tax purposes⁹, rather than treating Indian Country lands as separate and distinct from other jurisdictions (primarily states) for the purpose of obtaining accurate data to comprehensively inform what programming is needed to advance Tribal agriculture throughout Indian Country.

Farms by legal status. All farms were classified by legal status in the 2022 census. This section collects information for federal tax purposes to determine an operation’s legal status. The classifications used were:

1. Family or individual (sole proprietorship), excluding partnership and corporation.
2. Partnership, including family partnership – in selected tables, partnership was further subclassified into:
 - a. Registered under State law.
 - b. Not registered under State law.
3. Corporation, including family corporations - in selected tables, corporation was further subclassified into:
 - a. Family held or other than family held.
 - b. More than 10 stockholders.
4. **Other - estate or trust, prison farm, grazing association, American Indian reservation, etc.**

Quoting USDA NASS, 2022 Census of Agriculture App. B. General Explanation and Census of Agriculture Report Form B - 6 (emphasis added).

The lack of interoperability of Tribal agriculture and land data between federal departments further limits access to federal programs. For example, to participate in many USDA programs, Tribal producers must obtain a Farm Number from FSA, which identifies the land that a producer farms or ranches. The FSA Farm Number, however, does not correspond with existing BIA Tract Numbers that are associated with the same farm or ranch. As a result, producers on Tribal lands have to secure two different sets of numbers (one from the USDA and one from the BIA) to enroll their land in USDA programs.

⁶ 2022 Census of Agriculture Highlights: American Indian and Native Alaska Producers.

https://www.nass.usda.gov/Publications/Highlights/2024/Census22_HL_AmericanIndianANProducers.pdf.

⁷ USDA NASS, 2022 Census of Agriculture Subject Series vol. 2, pt. 5, *American Indian Reservations* (August 2024),

https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/American_Indian_Reservations/AMINDIAN.pdf

⁸ 2022 Census of Agriculture Table 74. Summary by Legal Status for Tax Purpose.

https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1,_Chapter_1_US/st99_1_074_074.pdf

⁹ See USDA NASS, 2022 Census of Agriculture App. B. General Explanation and Census of Agriculture Report Form B - 6,

https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1,_Chapter_1_US/usappxb.pdf (emphasis added).



Traditional Ecological Practices

Data sovereignty is distinct, though related, to the use of traditional ecological practices. Tribes and Tribal producers have stewarded their lands since time immemorial, yet traditional ecological practices to conserve, protect, enhance, and produce on their ancestral lands are often not recognized by USDA and the Bureau of Indian Affairs (BIA).

While the USDA's Natural Resource Conservation Service (NRCS) has taken steps towards incorporating traditional ecological knowledge (TEK) into their conservation practices, many traditional practices go unrecognized. NRCS, for example, supports the use of hedgerows, a line of densely planted trees or shrubs that serve as a windbreak and protect soil and crops from wind erosion. A traditional ecological practice is to plant crops in natural depressions in the landscape, similarly protecting soil and crops from wind. This practice is not recognized by NRCS.

IAC makes the following recommendations:

- **Recommendation 3:** Establish separate committees on Tribal data sovereignty and on Traditional Ecological Practices. Though these issues are related, they require differing expertise and responsibilities that cannot be effectively met in a single committee.
- **Recommendation 4:** Require the two committees to conduct consultations with Tribes on data sovereignty and integration of Traditional Ecological Practices, including on the use of Traditional Ecological Practices in agriculture and land management, protection of the intellectual property of Tribes, and what agriculture and land data would be most useful to Tribes and Tribal producers.
- **Recommendation 5:** Among other duties, the Committee on Tribal Data Sovereignty should be responsible for
 - Facilitating the sharing of agricultural and land management data on Tribal lands with their respective Indian Tribe. This data is critical for effective agricultural and land management of Tribal lands and Tribal data sovereignty.
 - Making recommendations for protection of Tribal data and providing Tribes with maximal control over the use, collection, and distribution of data. Tribes who choose to limit access to their data and intellectual property should not be penalized.
 - If the Committee reports positively on the feasibility of establishing data standards for Native Americans and Tribes, issuing a follow-up report promulgating these standards and requiring relevant federal agencies, including USDA and DOI, to issue updated regulations implementing the new standards.
- **Recommendation 6:** Among other duties, the Committee on Traditional Ecological Practices should be responsible for:
 - Making recommendations for better integrating Traditional Ecological Practices into federal programs, including at USDA and BIA



- Making recommendations for protecting Tribal intellectual property rights for Traditional Ecological Practices.

Sec. 303. Tribal Advisory Committee on American Indian, Alaska Native, and Native Hawaiian Youth Data Sovereignty and Traditional Ecological Practices

IAC generally supports the establishment of tribal advisory committees focused on data sovereignty and traditional ecological practices. However, IAC believes that Tribal data sovereignty and traditional ecological practices are separate — though related — issues that would be best served by separate advisory committees.

IAC makes the following recommendations for improvements:

- **Recommendation 7:** Establish separate tribal advisory committees on each youth data sovereignty and on traditional ecological practices. Though these issues are related, they require differing expertise and responsibilities that cannot be effectively met in a single committee.
- **Recommendation 8:** Require at least one member of the tribal advisory committee on traditional ecological practices have expertise in agriculture management. There is enormous opportunity to integrate traditional ecological knowledge into federal agricultural and land management programs and grants, including in conservation, wildfire prevention, soil and water quality, traditional crops and livestock, pest management, and more — yet the advisory committee established by the legislation lacks dedicated representation from agriculture experts.

Comments on Title VI – Improving Nutrition Programs for Native Children, Youth, and Families

IAC supports Sec. 601 and Sec. 602 to expand self-determination authority for the Food Distribution Program on Indian Reservation (FDPIR) and Supplemental Nutrition Assistance Program (SNAP); Sec. 603 to establish a self-determination pilot for Alaska Native regional non-profit corporations and Metlakatla Indian Community for SNAP; and Sec. 604 to codify the Child Nutrition Programs Tribal Pilot Projects. These programs are critical for expanding Tribal food sovereignty, increase access to culturally relevant and traditional foods, and support the wellbeing and health of Tribal children, youth, and families.

While these federal programs are critical for addressing food insecurity for Tribal children, youth, and families, IAC strongly encourages the Committee to consider additional changes and programs that would invest in Tribal farmers, ranchers, hunters, gathers, fishers, and herders and Tribal agribusinesses and restore access to locally grown foods, as well as traditional, culturally relevant foods.



Unfortunately, Tribes are often located in food deserts, areas lacking reliable access to grocery stores and fresh foods. For example, the Navajo Nation, which spans 27,000 square miles¹⁰, has fewer than 13 grocery stores¹¹. According to USDA, only 25.6% of Tribal members live within walking distance of a grocery store¹², and the average FDIPIR participant traveled 19 miles to pick up their food package¹³. Moreover, food prices on reservations are often more expensive: 40% more for a gallon of milk, 85% more for a loaf of bread, and 71% more for chicken¹⁴.

Supporting Tribal producers with bringing their products to market would address this food desert crisis, increasing access to fresh, locally produced foods and to culturally relevant foods while reducing food insecurity and driving economic opportunity. Unfortunately, Tribal producers face unique and long-standing challenges bringing food products to market due to lack of access to capital, infrastructure, and markets on Tribal lands.

To address these challenges and improve access to local, fresh foods and to traditional foods, IAC makes the following recommendations:

- **Recommendation 9:** Include or amend the bipartisan Strengthening Local Food Security Act ([S.2338](#)) or the bipartisan Local Farmers Feeding Our Communities Act ([H.R.4782](#)). Both bills aim to increase access to locally produced foods and support local producers by establishing a program for Tribes and States to purchase local foods for distribution through schools, food banks, childcare centers, and other community food programs. Over 90 Tribes participated in an earlier version of the program to enormous success and support. The Great Lakes Intertribal Food Coalition, for example, used the program to support distribution of over 90,000 food boxes for elders in 11 Tribes. Food boxes were sourced from 40 Native producers and contained traditional foods such as corn, bison, fish, and wild rice¹⁵. The legislation could be amended to focus on Tribes and would create new opportunities for Tribal producers to feed their own communities, improve access to traditional foods, and support child, youth, and family wellbeing.
- **Recommendation 10:** Amend Section 4405 of the Food, Conservation, and Energy Act of 2008 to establish a 5% Tribal set-aside for the Gus Schumacher Nutrition Incentive Program (GusNIP) or establish a separate Tribal Food is Medicine program under the Department of Health and Human Services. GusNIP was established to

¹⁰ See Navajo Nation Dep't of Transportation, *Discover Navajo* (last visited Sept. 12, 2025), <https://navajodot.org/#:~:text=Navajo%20Tourism%20Department,186%20miles%20of%20Navajoland%20shoreline>.

¹¹ Carmen George, et al., *Changes in food pricing and availability on the Navajo Nation following a 2% tax on unhealthy foods: The Healthy Dine Nation Act of 2014* (2021), PLOS ONE 16(9): e0256683. <https://doi.org/10.1371/journal.pone.0256683>

¹² USDA ERS, *Measuring Access to Healthful, Affordable Food in American Indian and Alaska Native Tribal Areas* (2014) https://ers.usda.gov/sites/default/files/_laserfiche/publications/43905/49689_eib131_summary.pdf?v=80684.

¹³ Nancy Pindus, et al., Urban Inst. for USDA FNS, *Study of the Food Distribution Program on Indian Reservations (FDPIR) FINAL REPORT* (June 2016), <https://fns-prod.azureedge.us/sites/default/files/ops/StudyofFDPIR.pdf>.

¹⁴ First Nations Development Institute, *Indian Country Food Price Index: Exploring Variation in Food Pricing Across Native Communities – A Working Paper II* (2018), <https://www.firstnations.org/publications/indian-country-food-price-index-exploring-variation-in-food-pricing-across-native-communities-a-working-paper-ii/>

¹⁵ First Nations Development Institute. *The Face of Disruption: Impacts of USDA Funding Cuts on Tribal Food Systems* <https://www.firstnations.org/news/the-face-of-disruption-impacts-of-usda-funding-cuts-on-tribal-food-systems/>



increase the purchase or consumption of fresh fruits and vegetables in low-income families. GusNIP achieves these goals through two main programs: a Nutrition Incentive Program that provides SNAP participants with financial incentives to produce fresh fruit and vegetables, and a Produce Prescription program that provides eligible families at risk for diet-related health conditions with “prescriptions” for free produce. By partnering with healthcare providers, produce prescription programs have shown improvements in diet-related health conditions and directly tie food access to health. Unfortunately, while Tribes are eligible to participate in GusNIP, funding is highly competitive, limiting Tribal access. Establishing a Tribal set-aside in the existing program or establishing a separate Tribal Food is Medicine Program would increase Tribal access to healthy foods while supporting child, youth, and family health.

Comments on Title VIII – Education.

IAC supports efforts to improve education for Tribal children and youth, including through teacher training, after school programs, and other resources. In addition, IAC believes there is strong opportunities to enhance educational opportunities for youth through the Federally Recognized Tribal Extension Program (FRTEP).

FRTEP is uniquely positioned to support after-school and youth development programs in Indian Country. FRTEP agents provide culturally relevant, community-based education in agriculture, 4-H, STEM, and healthy living for children, youth and families in and outside of school¹⁶.

For example, the Colville Reservation FRTEP training opportunities for adults in the community to volunteer with children and youth. Trained adults lead child and youth programs on cooking, crafting, shooting skills, large animal husbandry, gardening, growing food, nutrition, and more, emphasizing life skills, responsibility, community, and traditional practices. In one project, Tribal children and youth made “seed bombs” to help restore a landscape devastated by a wildfire. In subsequent years, FRTEP worked with schools to bring children and youth to the revitalizing landscape to learn about native plants, pollinators, wildlife, fish, and soil health. These and other programs support child and youth education, well-being, and community connection.

Additionally, the economic impact of extension programs is significant. A study of Arizona’s Extension demonstrated that “Extension operations [in Arizona] generate at least a one-to-one match on their direct state funding.... [F]rom a total economic impact perspective, the Return on Investment (ROI) is even greater.”¹⁷

¹⁶ Tribal Extension, *Community outreach in agriculture and youth development* (last visited Sept. 2025), <https://tribalextension.org/>.

¹⁷ University of Arizona Cooperative Extension, *The Economic and Functional Impact of Arizona Extension* (May 2022), <https://extension.arizona.edu/sites/default/files/data/The%20Economic%20and%20Functional%20Impact%20of%20Arizona%20Extension.pdf>.



Despite this impact, FRTEP is chronically underfunded through the appropriations process. The FY26 House Interior Appropriations bill funds FRTEP at just \$4.5 million, while the Senate bill only includes \$4 million. As a result of limited funding, while there are 574 Federally Recognized Tribes with jurisdiction over 55 million acres of land, there are only 35 FRTEP agents currently serving 32 Tribes.¹⁸ Just 5% of Indian Country has access to Extension services. In contrast, county extension offices exist across nearly every county in the nation.¹⁹ A

The competitive nature of FRTEP funding is also problematic. County Extension programs are supported through Smith–Lever capacity funding, which provides every state with a stable allocation of federal dollars based on a formula that accounts for factors like population, farm population, and rurality.²⁰ In contrast, the limited amount of FRTEP funding is award competitively, forcing Tribes to compete against one another²¹ and discouraging long-term planning and investment²². As an example, one of the most well-established FRTEP programs in South Dakota lost its funding in the 2017 cycle, abruptly halting their important work and fracturing their stability.²³

- **Recommendation 11: Convert FRTEP from a competitive grant program to a capacity-funded program** under a modified Smith–Lever mechanism, with allocations determined by formula factors such as Tribal population, rurality, and agricultural activity. In recognition of the program’s underdeveloped funding base and the limited availability of unrestricted Tribal resources, statutory matching requirements should be waived for Tribal recipients. This structure would provide predictable, non-competitive funding, facilitate long-term program planning, and align FRTEP with the equitable service delivery model afforded to county Extension systems, supporting programming and wellbeing for Tribal children and youth.
- **Recommendation 12: Require USDA to conduct a study on the economic impact of FRTEP.** The economic impact of Arizona Tribal Extension demonstrates the critical need FRTEP serves for Tribal agriculture producers, youth, and communities. A similar study should be conducted looking at the economic impact of FRTEP at large to help secure future funding increases for this vital program.

¹⁸ 2022 Census of Agriculture Highlights, *supra* n.6.

¹⁹ Indian Country Extension Commission, *Indian Country Extension Development under the Revised Federally Recognized Tribal Extension Program Findings 12* (2022), https://iltf.org/wp-content/uploads/2022/05/FRTEP_Indian-CountryExtensionCommissionRecs_Final_LowRes.pdf.

²⁰ See Smith-Lever Act, Pub. L. 105–185, §3(a), June 23, 1998, 112 Stat. 525 (codified as 7 USC 343(c)).

²¹ Environ. and Energy Study Inst., *Growing Stronger: The Federally Recognized Tribes Extension Program at Work* (Oct. 2023), <https://www.eesi.org/articles/view/growing-stronger-the-federally-recognized-tribes-extension-program-at-work>.

²² Congressional Research Service, *The Agricultural Cooperative Extension System: An Overview* (2024), <https://www.congress.gov/crs-product/R48071>.

²³ Environ. and Energy Study Inst., *supra* n.21.



Thank you again for this opportunity to support Tribal children, youth, and families. If you have any questions about these recommendations, please do not hesitate to reach out to IAC's Chief Policy and Legal Officer, Abi Fain, at abi@indianag.org and our Policy Director, Mai Nguyen, at mai@indianag.org.

Thank you,

A handwritten signature in black ink that reads "Kari Jo Lawrence". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Kari Jo Lawrence

CEO

Intertribal Agriculture Council

