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The Historical Determinants of Food Insecurity in Native Communities

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Executive Summary: Tribal Sovereignty and Food Insecurity

For millennia, Native food systems nourished communities and cultures. From farming to fishing to harvesting wild rice, these food traditions are diverse and rich, molded and shaped by the geographies on which Tribal people live. Federal policies promoted settler-colonialism,² land theft, and forced removal of Native nations, which disrupted these food systems and lifeways, contributing to present-day food insecurity and poor health outcomes. Forced onto reservations — often on lands unfamiliar to them — Native communities had to forge new lives in the face of seismic disruption.

The General Allotment Act of 1887, also called the Dawes Act, further deepened land loss for Native nations. The Act parceled communally held Native lands into allotments to be held by individual Tribal members. From 1887 until 1934's Indian Reorganization Act, federal policy cost Tribes an additional 90 million acres of Native land, roughly the size of Montana, significantly decreasing the land base of Indian Country and creating negative, lasting impacts felt today.

Tribes are sovereign; they have the right to self-govern and engage in nation-to-nation relationships with the federal and state governments.³ In fact, Tribes signed nearly 400 such treaties

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² Settler colonialism “destroys to replace” and occurs when the colonizing nation or group remains in the land that it has invaded. See Patrick Wolfe, “Settler colonialism and the elimination of the native,” *Journal of Genocide Research*, Vol. 8, No. 4, 2006, <https://www.tandfonline.com/doi/full/10.1080/14623520601056240>. Settler colonialism “operates on the logic that Indigenous peoples must be erased (physically or through assimilation) so that settlers’ legitimacy to settle, occupy and control Indigenous lands and resources is secured.” See Lana Ray, Lloy Wylie, and Ann Marie Corrado, “Shapeshifters, systems thinking and settler colonial logic: Expanding the framework of analysis of Indigenous health equity,” *Social Science & Medicine*, Vol. 300, May 2022, <https://www.sciencedirect.com/science/article/pii/S0277953621007541>.

³ National Congress of American Indians, “Tribal Governance,” <https://www.ncai.org/policy-issues/tribal-governance>.

between 1778 and 1871.⁴ However, the federal government has consistently broken treaties with Tribes and continues to do so. These broken promises meant that eastern Tribes were displaced further and further west. Further, reservations constrict Tribal communities' ability to hunt, fish, farm, and gather as they had for centuries before.

Many treaties and the federal-Tribal trust relationship stipulate that the U.S. government supply Native nations with food, guarantee them access to traditional agricultural lands, and/or provide agricultural implements or livestock.⁵ For example, in a 1791 treaty with the Cherokee Nation of Oklahoma, the U.S. government stipulated that it would “from time to time furnish gratuitously the said nation with useful implements of husbandry.”⁶ An 1789 treaty between the U.S. government and the Wyandot, Delaware, Ottawa, and Chippewa Tribes guaranteed that the Tribes could still hunt in their ancestral lands, stating that Tribal members were “at liberty to hunt within the territory ceded to the United States, without hindrance or molestation, so long as they demean themselves peaceably.”⁷ An 1832 treaty between the Sauk and Fox Tribes and the U.S. government unironically praised the U.S.'s generosity in its provision of rations:

The United States, besides the presents, delivered at the signing of this treaty, wishing to give a striking evidence of their mercy and liberality, will immediately cause to be issued to the said confederated tribes, principally for the use of the Sac [Sauk] and Fox women and children, whose husbands, fathers and brothers, have been killed in the late war, and generally for the use of the whole confederated tribes, articles of subsistence as follows: — thirty-five beef cattle; twelve bushels of salt; thirty barrels of pork; and fifty barrels of flour, and cause to be delivered for the same purposes, in the month of April next, at the mouth of the lower Ioway, six thousand bushels of maize or Indian corn.⁸

To nominally honor these treaty obligations, the federal government has distributed rations to Tribal communities since the 1800s.⁹ As the Sauk and Fox treaty reflects, the federal government emphasized “articles of subsistence,” not foods with cultural relevance and nutritional value.¹⁰

⁴ An 1871 federal law ended formal treaty-making with Tribal nations, but Tribal-federal government relations continue via acts of Congress, executive orders, executive agreements, and contracts and compacts. National Congress of American Indians, “Tribal Nations and the United States: An Introduction,” February 2020, https://www.ncai.org/tribalnations/introduction/Indian_Country_101_Updated_February_2019.pdf. See also U.S. Department of the Interior, “Does the United States still make treaties with Indian tribes?” November 15, 2019, <https://www.bia.gov/faqs/does-united-states-still-make-treaties-indian-tribes>.

⁵ First Nations Development Institute, “Roots of Change: Food Policy in Native Communities,” 2016, <https://www.firstnations.org/wp-content/uploads/publication-attachments/Roots%20of%20Change%20-%20Food%20Policy%20FINAL.pdf>.

⁶ Yale Law School, Lillian Goldman Law Library, “Treaty With the Cherokee: 1791,” https://avalon.law.yale.edu/18th_century/chr1791.asp.

⁷ Yale Law School, Lillian Goldman Law Library, “Treaty With the Wyandot, etc.: 1789,” https://avalon.law.yale.edu/18th_century/wya1789.asp.

⁸ Northern Illinois University Digital Library, “Treaty with the Sauk and Foxes, 1832,” <https://digital.lib.niu.edu/islandora/object/niu-lincoln%3A35073>.

⁹ Dana Vantrease, “Commod Bods and Frybread Power: Government Food Aid in American Indian Culture,” *Journal of American Folklore*, Vol. 126, No. 499, Winter 2013, <https://www.jstor.org/stable/10.5406/jamerfolk.126.499.0055>.

¹⁰ *Ibid.*

Rations consisted of foods such as lard and wheat flour that were foreign to the diets of Tribal communities and sometimes arrived “rancid and rotten.”¹¹

Indeed, ration foods were often unhealthy; they aimed to prevent starvation rather than provide adequate nutrition, with a focus on “low-cost and shelf-stable” options.¹² Diabetes was rare among Native peoples before the 1940s¹³ (the Navajo language had no word for diabetes prior to European arrival, for example)¹⁴ but exploded in the wake of commodity distribution, strongly contributing to the obesity and diabetes epidemics that Native communities are currently fighting.¹⁵

Due largely to these government policies, food insecurity and poverty are high among Native communities today. From 2000 to 2010, 25 percent of American Indians and Alaska Natives (AIAN) were consistently food insecure, double the rate of white Americans.¹⁶ This trend continued from 2010 to 2020 where AIAN food insecurity was roughly double, and at times triple, the food insecurity white people faced. (See Figure 1.) The COVID-19 pandemic has exacerbated food insecurity among AIAN communities.¹⁷ A recent study by the Native American Agriculture Fund found that during the pandemic, 56 percent of survey respondents across the country experienced food insecurity, with 31 percent experiencing very low food security (the most severe form of food hardship).¹⁸ Some 68 percent of AIAN school-age children qualify for free lunches, and nearly 1 in 4 AIAN people live in poverty after accounting for taxes and government assistance — more than

¹¹ Janie Simms Hipp and Wilson Pipestem, “Feeding Ourselves: Food access, health disparities, and the pathways to healthy Native American Communities,” Echo Hawk Consulting, 2015, <https://seedsofnativehealth.org/echo-hawk-consulting-releases-feeding-ourselves-food-access-health-disparities-and-the-pathways-to-healthy-native-american-communities/>.

¹² Vantrease.

¹³ Dawn Satterfield *et al.*, “Health Promotion and Diabetes Prevention in American Indian and Alaska Native Communities — Traditional Foods Project, 2008–2014,” *Morbidity and Mortality Weekly Report Supplement*, 2016, <https://www.cdc.gov/mmwr/volumes/65/su/su6501a3.htm#suggestedcitation>.

¹⁴ Hipp and Pipestem.

¹⁵ *Ibid.*

¹⁶ Valarie Blue Bird Jernigan *et al.*, “Food Insecurity among American Indians and Alaska Natives: A National Profile using the Current Population Survey–Food Security Supplement,” *Journal of Hunger and Environmental Nutrition*, Vol. 12, Issue 1, 2017, <https://pubmed.ncbi.nlm.nih.gov/28491205/>.

¹⁷ Toni Stanger-McLaughlin *et al.*, “Reimagining Hunger Responses in Times of Crisis,” Native American Agriculture Fund, Indigenous Food and Agriculture Initiative, University of Arkansas, and Food Research & Action Center, 2021, <https://nativeamericanagriculturefund.org/wp-content/uploads/2018/04/Reimagining-Hunger-Responses-in-Times-of-Crisis.pdf>.

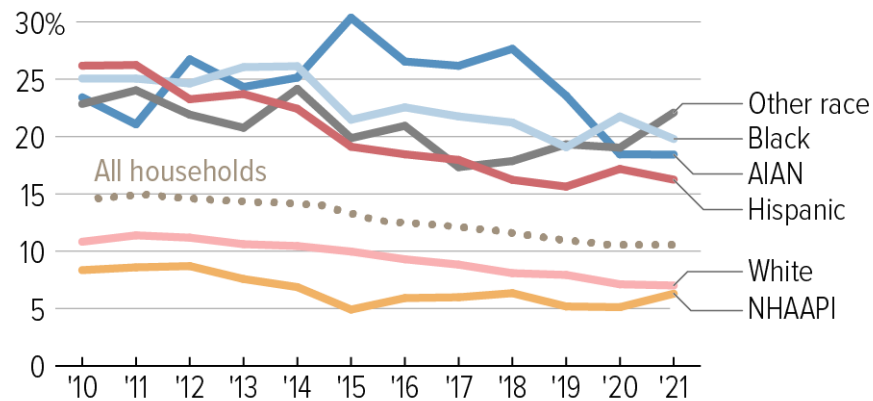
¹⁸ Stanger-McLaughlin *et al.*

twice the rate of white people.¹⁹ As discussed below, high poverty rates among AIAN communities are linked to land tenure issues that result directly from previous federal policy.²⁰

FIGURE 1

Food Insecurity by Race and Ethnicity Reveals Stark Disparities

Households that lacked access to adequate food at some point in the year



Note: Other race = people who are more than one race. AIAN = people who are American Indian or Alaskan Native. NHAAPI = people who are Asian, Hawaiian, or Pacific Islander. Hispanic people may be of any race. Race and ethnicity for the household are based on that of the household reference person (in whose name the housing unit is owned or rented).

Source: U.S. Department of Agriculture, Current Population Survey Food Security Supplement 2010-2021

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In addition, some Native communities tend to pay higher prices for food than the average U.S. consumer.²¹ (See Figure 2.) A gallon of milk cost the average U.S. consumer \$2.48, but reservation residents in the study paid an average of \$3.47, nearly 40 percent more, according to a 2018 report

¹⁹ Sonya Acosta, “Tribal Housing Funding a Critical Component of Build Back Better,” CBPP, December 9, 2021, <https://www.cbpp.org/blog/tribal-housing-funding-a-critical-component-of-build-back-better>; Elizabeth Hoover, “Native food systems interrupted by COVID,” *Agriculture and Human Values*, Vol. 37, Issue 3, May 2020, <https://doi.org/10.1007/s10460-020-10089-7>; Danilo Trisi and Matt Saenz, “Economic Security Programs Reduce Overall Poverty, Racial and Ethnic Inequities,” CBPP, updated July 1, 2021, <https://www.cbpp.org/research/poverty-and-inequality/economic-security-programs-reduce-overall-poverty-racial-and-ethnic>.

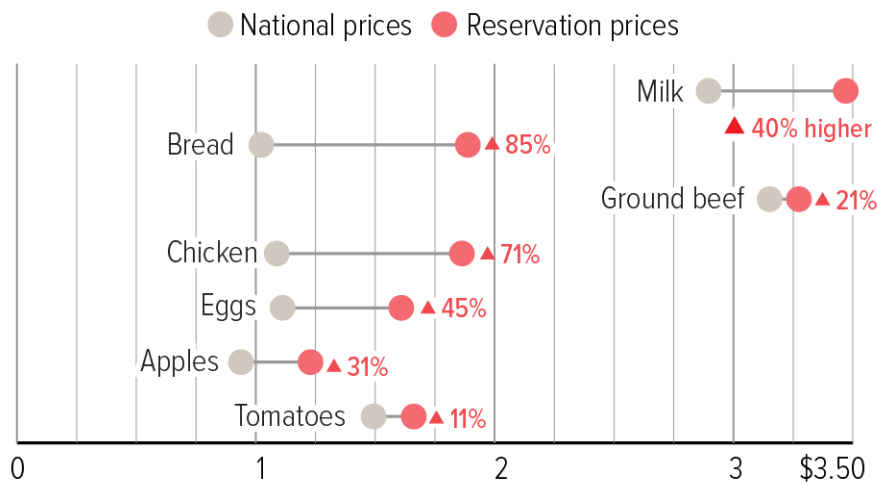
²⁰ Bryan Leonard, Dominic P. Parker, and Terry L. Anderson, “Land quality, land rights, and indigenous poverty,” *Journal of Development Economics*, Vol. 143, March 2020, <https://www.sciencedirect.com/science/article/pii/S0304387818315402?via%3Dihub>.

²¹ A-dae Romero-Briones and Raymond Foxworth, “Indian Country Food Price Index: Exploring Variation in Food Pricing Across Native Communities – A Working Paper,” First Nations Development Institute, 2016, <https://www.firstnations.org/publications/indian-country-food-price-index-exploring-variation-in-food-pricing-across-native-communities/>.

by First Nations Development Institute.²² A loaf of bread cost the average U.S. consumer \$1.02, but the price in Indian Country was \$1.89, roughly 85 percent more. Apples cost about 30 percent more in Indian Country. Certain unhealthy foods, however, were cheaper than the U.S. average. Indeed, another analysis by First Nations Development Institute found that the average price of Cheetos was consistently lower than the U.S. average.²³

FIGURE 2

Reservation Residents Pay Higher Food Prices Than Other U.S. Consumers



Note: Prices were collected for the following units of food: a gallon of milk, a loaf of bread, a pound of ground beef, a whole chicken, a dozen eggs, a pound of apples, and a pound of tomatoes.

Source: Yadira Rivera and Raymond Foxworth, "Indian Country Food Price Index: Exploring Variation in Food Pricing Across Native Communities – A Working Paper II," First Nations Development Institute, 2018, Table 20.

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Lack of access to vehicles, particularly for rural reservation communities, exacerbates problems caused by higher prices. A 2016 study found that 31 percent of households participating in the Food Distribution Program on Indian Reservations (FDPIR), a federal food assistance program for Tribal communities, lacked access to a vehicle, though the average travel distance to obtain a FDPIR package was 16 miles.²⁴

²² Yadira Rivera and Raymond Foxworth, "Indian Country Food Price Index: Exploring Variation in Food Pricing Across Native Communities – A Working Paper II," First Nations Development Institute, 2018, <https://www.firstnations.org/publications/indian-country-food-price-index-exploring-variation-in-food-pricing-across-native-communities-a-working-paper-ii/>.

²³ Romero-Briones and Foxworth.

²⁴ Nancy M. Pindus *et al.*, "Study of the Food Distribution Program on Indian Reservations," U.S. Department of Agriculture, June 2016, <https://www.fns.usda.gov/fdpir/study-fdpir-8>.

Further, AIAN people experience elevated rates of diabetes and obesity.²⁵ In fact, 48.1 percent of AIAN adults are obese, and in some Tribal communities, childhood obesity rates exceed 50 percent.²⁶ With adult diabetes rates at 23.5 percent, Native adults contend with diabetes at nearly four times the rate of the non-Hispanic white population. In addition, Native peoples are more than twice as likely to die as a result of diabetes than the non-Hispanic white population, suggesting disparities in access to quality health care.²⁷

While life expectancy gaps between AIAN people and white people have closed in recent years,²⁸ persistent underfunding of the Indian Health Service (IHS) fails to serve Native communities and meet the federal government’s treaty obligations.²⁹ Indeed, the National Congress of American Indians calculated that 2017 per capita spending for IHS patient health services was less than half of the average nationwide spending on health care: \$4,079 vs. \$9,726.³⁰

Although the nutritional quality of commodity programs has since improved — owing in strong part to advocacy efforts of Tribal leaders and the FDPIR Food Package Review Work Group, formed in 2002 — barriers to food security and sovereignty³¹ among Tribal communities remain. Food sovereignty and the incorporation of traditional foods are important steps in addressing current rates of food insecurity, as well as diet-related diseases. The recently implemented FDPIR Self-Determination Demonstration Project, authorized by the 2018 farm bill, is an exciting step toward incorporating Tribally grown foods into FDPIR supply chains.

This report discusses the historical factors that underlie the high rates of food insecurity and poverty that Native communities now face. It examines three assimilative policies and practices — land ownership and use, boarding schools and education, and commodity food distribution — to

²⁵ Department of Health and Human Services, Office of Minority Health, “Diabetes and American Indians/Alaska Natives,” 2021, <https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=4&lvlid=33>; Department of Health and Human Services, Office of Minority Health, “Obesity and American Indians/Alaska Natives,” 2020, <https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=4&lvlid=40>.

²⁶ Department of Health and Human Services, Office of Minority Health, “Obesity and American Indians/Alaska Natives.” See also Hipp and Pipestem.

²⁷ Department of Health and Human Services, Office of Minority Health, “Diabetes and American Indians/Alaska Natives.”

²⁸ U.S. Department of Health and Human Services, Office of Minority Health, “Profile: American Indian/Alaska Native,” May 21, 2021, <https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=3&lvlid=62>.

²⁹ Donald Warne and Linda Bane Frizzell, “American Indian Health Policy: Historical Trends and Contemporary Issues,” *American Journal of Public Health*, Vol. 104, Suppl. 3, June 2014, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4035886/>.

³⁰ National Congress of American Indians, “Fiscal Year 2021 Indian Country Budget Request: Healthcare,” <https://www.ncai.org/resources/ncai-publications/indian-country-budget-request/Healthcare.pdf>.

³¹ Describing its Tribal Food Sovereignty Initiative, the National Congress of American Indians defines food sovereignty as “the right to freely develop and implement self-determined definitions of food sovereignty; cultivate, access, and secure nutritious, culturally essential food produced through ecologically sound and sustainable methods; and design and maintain food systems and enact policies that advance tribal priorities for ensuring that tribal citizens have the sustenance they need to thrive physically, mentally, socially, and culturally not just today, but for the generations to come.” See: National Congress of American Indians, “Tribal Food Sovereignty Advancement Initiative,” <https://www.ncai.org/initiatives/partnerships-initiatives/food-sovereignty>.

provide a fuller picture of current food assistance policies, particularly around engaging Tribal sovereignty and empowering Tribal nations in policymaking and implementation.

Land Ownership and Use

Food insecurity among Tribal communities today cannot be divorced from their land history, as federal policy promoted settler-colonialism and land theft, which disrupted Tribal communities' food systems. One pivotal law is the 1887 Dawes Act, under which the U.S. government appropriated — effectively stole — collectively held Native land and then parceled it back to individual Native people (“allottees”). Typically 40, 80, or 160 acres in area, these parcels were held in trust by the federal government on behalf of allottees for 25 years,³² during which they were not subject to taxation. Allottees could manage the land but could not lease or sell it without government consent.³³ Under the Dawes Act, after 25 years elapsed, allottees would own the land “fee simple,” meaning they would have full ownership and the ability to develop and manage the land as they wished. The land would also become subject to taxation at this time.³⁴

This policy was conceived of as a “civilizing” boon to Indian Country.³⁵ Native peoples would engage in land ownership patterns like white Americans. They would enter the mainstream economy and become “self-sufficient,” by Euro-American standards. They would shift from traditional agricultural practices, adopting Euro-American planting methods and cultivating cash crops for sale. By assimilating into the dominant culture, proponents of the policy argued, Native peoples could secure their futures.

Many Tribes resisted allotment policy, understanding that the impacts would be disastrous for their communities. Cherokee advocates urged Congress to reject the “insidious and dangerous” Act, which would cause “poverty and misery for the masses of the people.”³⁶ They pointed out that pro-allotment congressmen could leverage allotment toward the interest of railroad companies and land

³² At present, trust land can be held by Tribes, by individual Tribal members, leased by Native people, and leased by non-Native people. Unlike trust lands, which are held by the federal government on behalf of Tribes or Tribal members, restricted fee lands are owned by individual Tribal members or Tribes, but have restrictions against them, such that they may not be “alienated” (e.g., sold) or “encumbered” (e.g., leased). Fee simple lands are owned outright and can be sold, leased, transferred, etc. without BIA approval. Notwithstanding significant cost and red tape, lands can be converted from fee to trust and vice versa. See: Tana Fitzpatrick, “Tribal Land and Ownership Statuses: Overview and Selected Issues for Congress,” Congressional Research Service, December 23, 2020, <https://crsreports.congress.gov/product/pdf/R/R46647/2>.

³³ Indian Land Tenure Foundation, “Land Tenure History,” <https://iltf.org/land-issues/history/>.

³⁴ Indian Land Tenure Foundation, “The Message Runner, Vol. 1,” November 2002, <https://iltf.org/wp-content/uploads/2016/11/Message-Runner-1-lowres.pdf>.

³⁵ Northern Plains Reservation Aid, “History and Culture: Allotment Act – 1887,” http://www.nativepartnership.org/site/PageServer?pagename=airc_hist_allotmentact.

³⁶ Tom Holm, “Indian Lobbyists: Cherokee Opposition to the Allotment of Tribal Lands,” *American Indian Quarterly*, Vol. 5, No. 2, May 1979, https://www.jstor.org/stable/1183752?read-now=1&refreqid=excelsior%3A46408aeced6627a62f4547678972fd96&seq=9#page_scan_tab_contents.

speculators.³⁷ Leaders of the Red Lake Nation in Minnesota outmaneuvered allotment policy, and all of the Tribe's reservation in north-central Minnesota remain owned solely by Tribal members.³⁸

The allotment process validated Tribal leaders' fears. Often, the choicest treaty lands — for example, parcels closest to streams for crop irrigation — were excluded from allotment, deemed “in excess of Indian needs.”³⁹ Instead, those lands were appropriated by the government, to be sold to and settled by non-Native people. Taking the most productive Native lands away from Native peoples directly conflicted with the Dawes Act's purported goal of promoting economic self-sufficiency.

Subsequent federal policy continued to chip away at Tribes' land bases. Under the Burke Act of 1906, the Secretary of the Interior could take trust-held lands out of trust at any time if the allottee was deemed “competent,” making these lands subject to taxation,⁴⁰ regardless of the wishes and knowledge of the allottee. Many parcels of land fell into tax foreclosure because the allottees were unfamiliar with the tax process or unable to cover land taxes.⁴¹

In 1934, allotment policy ended with the Indian Reorganization Act, and the federal government placed allotment lands indefinitely in trust, a policy that continues today. This means the land is held by the U.S. government on behalf of individual Native people and Tribes; individuals do not own land outright, meaning that landowners must secure Bureau of Indian Affairs (BIA) approval in order to sell, lease, or use it as collateral in securing a loan, a crucial consideration for producers.⁴²

From the 1880s to 1934, allotment policy transferred 90 million acres of land from Native to non-Native ownership. This is roughly the size of Montana, the fourth-largest state in the U.S. Without the Dawes Act, American Indian and Alaska Native lands would together encompass 190 million acres, or 7.8 percent of the U.S. land base — nearly twice what they do today.⁴³ And the most valuable lands were often removed from Native ownership, deeded to white settlers.

The Dawes Act and the trust status of Native lands are at the root of several land issues that continue to challenge Tribes' abilities to feed their communities. Across Indian Country, dual issues of fractionation and checkerboarding (see box, “Tribal Sovereignty and Land Issues”) make it difficult for Native communities to develop and manage their lands as they might wish, particularly the uses of farming, ranching, and agricultural production more broadly. This diminishes the ability of Native communities to use their lands in culturally and economically productive ways.

³⁷ Holm.

³⁸ Minnesota Indian Affairs Council, “Miskwaagamiiwi-Zaagaiganing / Red Lake Nation,” <https://mn.gov/indianaffairs/redlake-iac.html>.

³⁹ Indian Land Tenure Foundation, “The Message Runner, Vol. 1.”

⁴⁰ *Ibid.*

⁴¹ Indian Land Tenure Foundation, “Land Tenure History.”

⁴² Bureau of Indian Affairs, “Real Estate Services,” <https://www.bia.gov/regional-offices/alaska/real-estate-services>.

⁴³ Congress of American Indians, “Indian Country Demographics,” <https://www.ncai.org/about-tribes/demographics>.

Tribal Sovereignty and Land Issues

Fractionation: The Dawes Act established troublesome land inheritance patterns that continue today. When an individual allottee passes away, the interest and income generated from their allotment are split among their heirs. Thus, ownership of a given parcel of land is “fractionated” (divided) further and further with each new generation. Some parcels are owned by thousands of people, so any one individual receives just pennies from every dollar of income generated. Further, to meaningfully develop the land, any one individual interest holder would need to secure majority consent among all allottees.

The Highly Fractionated Indian Land Program, established in 2014, offers a pathway for Tribes and Tribal members to consolidate fractionated parcels through a revolving loan fund. Consolidating fractionated parcels can, in turn, expand access to U.S. Department of Agriculture (USDA) programs and increase the agricultural productivity of the land.

Checkerboarding: Because of allotment policy, 90 million acres of Native lands passed into non-Native ownership. As a result, reservation communities are sometimes checkerboarded – with adjacent parcels of land owned by Tribal members, Tribes, and non-Tribal members. In addition to creating jurisdictional issues, this can make land uses that require larger parcels of land, such as farming or ranching, difficult for Tribal communities.

638 authority: Enacted in 1975, the Indian Self-Determination and Education Assistance Act (Public Law 93-638) gives Tribes greater authority in administering programs and services on their land and for their people. Tribal governments can enter into contracts (for specific parts of programs) or compacts (for entire programs) with the federal government and receive funding that the federal government would have used for the program. In the 2018 farm bill, USDA authorized a demonstration project to extend limited 638 authority for Tribes for the Food Distribution Program on Indian Reservations program (“FDPIR 638”); previously, 638 contracting and compacting was limited to programs under the departments of the Interior and Health and Human Services.

Self-determination under 638 authority differs from Tribes managing federal programs. Tribes, Indian Tribal Organizations (ITOs), and states can administer FDPIR and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), but Tribes cannot functionally operate SNAP.^a Currently, 276 Tribes participate in FDPIR, and 105 Tribal organizations, as well as three states, are funded to administer FDPIR.^b This means that USDA foods are purchased and shipped to administering agencies, which then distribute FDPIR foods, offer nutrition education, and more. 638 authority gives Tribes and ITOs greater control over federal nutrition programs. It enables Tribal communities to select and procure foods for their FDPIR programs, expanding Tribes’ ability to incorporate local, regional, and traditional foods into FDPIR packages.

^a Tribes can operate SNAP only if the relevant state agency has failed to “properly administer” SNAP, a threshold that effectively bans Tribes from operating SNAP.

^b U.S. Department of Agriculture, “USDA Invests \$3.5 Million to Provide Food Purchasing Options to Tribal Communities,” November 1, 2021, <https://www.fns.usda.gov/news-item/fns-0010.21>.

The trust status of Native lands presents barriers to accessing credit and capital, posing a particular problem for Native producers.⁴⁴ Unfamiliar with trust land ownership, many lenders are loath to invest in Indian Country, which decreases the ability of Native people to manage and

⁴⁴ We use the term *producer*, as opposed to *farmer*, here to reflect a wider array of agricultural production, including fishing, gathering/harvesting, farming, ranching, etc.

develop their lands. Issues such as BIA delays, lengthy environmental review, cultural insensitivity, and the rural nature of many reservations also pose barriers.⁴⁵

A 2019 Government Accountability Office report found that seven of the 11 Farm Credit Service associations interviewed expressed legal concerns about recovering collateral in the event of loan default.⁴⁶ The report also discussed the steep administrative barriers that some Native producers experience. Native producers must obtain documents, such as a title status report, from BIA for lenders when seeking agricultural financing. Some producers interviewed experienced significant delays in obtaining these documents; two Tribal members reported waiting months for the title status report, by which time the planting season could have easily passed.

This has particularly deep impacts on agricultural production in Indian Country, as modern agriculture requires inputs often financed on credit. Indeed, 63 percent of AIAN farms have sales and government payments of less than \$5,000 a year, whereas 44 percent of farms owned by producers of any race or ethnicity have sales at that level.⁴⁷ Further, 41 percent of AIAN farms have sales and government payments of less than \$1,000, compared to 23 percent of all farms. In short, land policy has hampered the ability of Native producers to viably manage their lands, with significant economic and food insecurity impacts for Tribal communities across the country.

Boarding Schools and Education

Adding to the damage caused by U.S. government land policy, education policy — specifically, the boarding school movement sponsored by the federal government starting in the late 1800s — further removed Native people from robust cultural and food traditions. Richard H. Pratt was a key leader in the movement, championing cultural assimilation under the banner of “kill the Indian, save the man.”⁴⁸ Located both on and off reservations, boarding schools served to assimilate Native youth into white American society through vocational and industrial training. By 1925, over 80 percent of Native youth attended boarding schools. In fact, over the course of six decades at least 600,000 Native youth were sent to boarding schools.⁴⁹

⁴⁵ David Listokin *et al.*, “Mortgage Lending on Tribal Land: A Report From the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs,” U.S. Department of Housing and Urban Development, January 2017, <https://www.huduser.gov/portal/sites/default/files/pdf/NAHSG-Lending.pdf>.

⁴⁶ U.S. Government Accountability Office, “Indian Issues: Agricultural Credit Needs and Barriers,” May 2019, <https://www.gao.gov/assets/700/699447.pdf>.

⁴⁷ U.S. Department of Agriculture, “2017 Census of Agriculture Highlights: American Indian/Alaska Native Producers,” 2017, https://www.nass.usda.gov/Publications/Highlights/2019/2017Census_AmericanIndianAlaskaNative_Producers.pdf.

⁴⁸ Richard H. Pratt, “Official Report of the Nineteenth Annual Conference of Charities and Correction (1892),” reprinted in Richard H. Pratt, “The Advantages of Mingling Indians with Whites,” *Americanizing the American Indians: Writings by the “Friends of the Indian” 1880–1900*, Harvard University Press, 1973. Accessed online: <http://historymatters.gmu.edu/d/4929/>.

⁴⁹ Valerie Segrest and Janie Simms Hipp, “Traditional Food Knowledge Among Native Americans,” American Federation of Teachers, 2020, https://www.aft.org/hc/fall2020/segrest_hipp.

The conditions at boarding schools were dire: one writer of the time stated that students were “virtually prisoners” of these institutions.⁵⁰ Students experienced physical, sexual, and emotional abuse at the hands of school officials.⁵¹ Tuberculosis, scrofula, and trachoma were widespread, and mortality rates were incredibly high: at one boarding school, the mortality rate in its initial years was nearly 20 percent; ten out of the first 49 students died.⁵² These schools aimed to stamp out Tribal identity at all costs — they banned students from speaking their languages, engaging with their cultures, and practicing their spiritual beliefs.⁵³

Boarding schools also kept students from their food traditions. Students received rations such as cornmeal mush, bread, and molasses — diets that tended to be high in starch and meat.⁵⁴ Further, for many, this was the first time they consumed simple sugars and refined carbohydrates.⁵⁵ Children experienced malnutrition and food shortages at boarding schools, with a per-student food allowance set, on average, at 11 cents a day (\$1.58 a day in 2021 dollars), according to 1928’s Meriam Report.⁵⁶ Students were often punished if they ate foods that they themselves had sowed, tended, and harvested on boarding school farms.⁵⁷ Removing Native youth from their communities had steep downstream impacts — as A-dae Romero-Briones reflected, “Extracting children from their Indigenous food system essentially creates individuals devoid of an understanding of their land, environments, political systems, education systems and spiritual systems, and no understanding of collective resource management.”⁵⁸

Some boarding schools had labor farms that served as nexuses of Indigenous resilience.⁵⁹ At the U.S. Industrial Indian and Training School (now Haskell Indian Nations University), Haskell Farm was a place of cultural coming together, notwithstanding the strenuous labor instructors forced Native youth to complete. Melinda Adams-Crow described Haskell Farm as a place

where children could talk their Native language to one another, or talk to family members in their Native language, or practice their ceremonial songs. These were things that were against the rules and were met with harsh punishment if you did them within the walls of the boarding school. So it was a place for escape. It was a safe place. A sacred place is a safe

⁵⁰ David H. Dejong, “‘Unless They Are Kept Alive’: Federal Indian Schools and Student Health, 1878-1918,” *American Indian Quarterly*, Vol. 31, No. 2, 2007, <https://www.jstor.org/stable/4138947>.

⁵¹ Stephen Colmant *et al.*, “Constructing Meaning to the Indian Boarding School Experience,” *Journal of American Indian Education*, Vol. 43, No. 3, 2004, <https://www.jstor.org/stable/24398535>.

⁵² Dejong.

⁵³ Soren C. Larsen and Jay T. Johnson, *Being Together in Place: Indigenous Coexistence in a More Than Human World*, University of Minnesota Press, 2017.

⁵⁴ Segrest and Hipp; Brenda J. Child, *Boarding School Seasons*, University of Nebraska Press, 1998.

⁵⁵ Donald Warne and Siobhan Wescott, “Social Determinants of American Indian Nutritional Health,” *Current Developments in Nutrition (supplement)*, 2019, <https://pubmed.ncbi.nlm.nih.gov/31453425/>.

⁵⁶ Child.

⁵⁷ Segrest and Hipp.

⁵⁸ Segrest and Hipp, quoting A-dae Romero Briones in “Fighting for the Taste Buds.”

⁵⁹ Larsen and Johnson.

place. A place you could express yourself without the repercussions you would have if you were caught in school.⁶⁰

Commodity Food Distribution

Native food systems and food cultures are robust and diverse. There is archaeological evidence of fishery management sites near Seattle tracking back 10,000 to 14,000 years, while archaeological evidence from the Southwest points toward thousands of years' worth of stable agricultural production.⁶¹ As Valerie Segrest and Janie Simms Hipp summarize:

In the context of time, woolly mammoths roamed lands as Native American ancestors dried berries in wild meadows. Rome and Athens, both ancient civilizations revered in history textbooks in the United States, were not even a thought at this time. Native Americans organized entire societies and assembled political structures around the management of food resources.⁶²

Traditional food systems — including practices such as farming, fishing, and migratory seasonal harvesting — that had nourished communities for millennia were transformed in the span of decades with the onset of settler-colonialism.⁶³ The reservation system diminished Tribes' abilities to engage in traditional food practices by reducing their access to land and water.

The federal government placed many Tribes on reservation lands that were wholly unfamiliar to them, or deeded parcels that were less agriculturally productive.⁶⁴ The Muscogee Nation, for example, traces its ancestral homelands to the southeastern U.S., but its reservation is in Oklahoma due to an 1827 treaty and forced removal.⁶⁵ The slaughter of the buffalo altered Great Plains Tribes' foodways, or the “traditional activities, attitudes, beliefs, and behaviors associated with food in [one’s] daily life.”⁶⁶ White residents killed Tribal people for hunting on lands to which treaties secured them access, as occurred in the 1908 Swan Massacre of Pend d’Oreille people.⁶⁷ Euro-American settler colonialism transformed agricultural, hunting, fishing, and gathering practices that had been honed for generations, although Tribes and Tribal communities adapted and continue to adapt in the face of continued hardships.

⁶⁰ *Ibid.*

⁶¹ Valerie Segrest and Janie Simms Hipp, “Traditional Food Knowledge Among Native Americans,” American Federation of Teachers, 2020, https://www.aft.org/hc/fall2020/segrest_hipp.

⁶² Segrest and Hipp.

⁶³ Hipp and Pipestem; Rachel V. Vernon, “A Native perspective: Food is more than consumption,” *Journal of Agriculture, Food Systems, and Community Development*, Vol. 5, Issue 4, 2015, <http://dx.doi.org/10.5304/jafscd.2015.054.024>; Segrest and Hipp.

⁶⁴ Vantrease

⁶⁵ The Muscogee Nation, “Muscogee (Creek) Nation History,” <https://www.muscogeenation.com/culturehistory/>.

⁶⁶ Julia Darnton, “Foodways: When food meets culture and history,” Michigan State University Extension, December 12, 2012, https://www.canr.msu.edu/news/foodways_when_food_meets_culture_and_history.

⁶⁷ Confederated Salish and Kootenai Tribes, Division of Fish, Wildlife, Recreation, & Conservation, “The Ecology of Violence: The Swan Massacre, Treaty Rights, and Fire,” <https://fwrconline.csktnrd.org/Fire/FireOnTheLand/History/19thCentury/SwanMassacre/>.

To prevent starvation and nominally meet its treaty and trust obligations, the U.S. government has distributed food commodities to Tribal nations for nearly two centuries. Emphasis was put on foods that would ship and preserve well.⁶⁸ An 1832 treaty describes provisions received by the Sauk and Fox Indians: “articles of subsistence as follows: thirty-five cattle; twelve bushels of salt; thirty barrels of pork; and fifty barrels of flour.”⁶⁹ The foodstuffs provided were sometimes cited as being “unfit for soldiers.”⁷⁰

The troubled legacy of commodity rations continued and deepened with FDPIR. In its initial years, the government provided to FDPIR participants only surplus USDA commodities, or excess agricultural products produced domestically.⁷¹ Commodity packages included non-native foods, such as lard, wheat-flour, canned fruit and vegetables — often high in sugar and sodium, respectively — and canned meat.⁷² High-fat, high-sodium, and calorically dense foods featured heavily. Food assistance tended to be low quality and nutritionally inadequate, and traditional foods, such as salmon for Northwest Coast tribes and buffalo for Great Plains tribes, were lacking from commodity packages.⁷³ Charles “Red” Gates, a FDPIR advocate, noted:

[The] canned fruits were all sweet with sugar. Really, none of it was really healthy for us. . . . It was basically those items that the government felt were surplus, and I will say somebody made a decision, oh, just give it to the Indians; they’ll eat it.⁷⁴

Codified in 1973 into FDPIR, commodity food distribution contributed to the rise in diet-related diseases, previously rare among those communities.⁷⁵ Widespread obesity effectually developed within generations.⁷⁶ The term “commod bod” originated in this era, to describe the link between rising obesity rates and unhealthy commodity distribution.⁷⁷ For many FDPIR participants, FDPIR food packages constitute their sole or primary food source: 37.7 percent reported so in a 2016 Urban Institute study.⁷⁸ As one group of scholars summarized in 2009, “In the past 40 years American Indian families have made voluntary and involuntary changes to their diets. One of the

⁶⁸ Vantrease.

⁶⁹ Vantrease, citing an 1832 treaty. For the text of the treaty see Charles J. Kappler, ed., “Indian Affairs: Laws and Treaties, Vol. 2,” U.S. Department of State, 1904, <http://memory.loc.gov/cgi-bin/ampage?collId=llsl&fileName=015/llsl015.db&recNum=2>.

⁷⁰ Vantrease.

⁷¹ Megan Mucioki, Jennifer Sowerwine, and Daniel Sarna-Wojcicki, “Thinking inside and outside the box: local and national considerations of the Food Distribution Program on Indian Reservations (FDPIR),” *Journal of Rural Studies*, Vol. 57, 2018, <https://www.sciencedirect.com/science/article/pii/S0743016717304199>.

⁷² Vantrease.

⁷³ Edwards and Patchell.

⁷⁴ Mucioki, Sowerwine, and Sarna-Wojcicki.

⁷⁵ Thomas K. Welty, “Health implications of obesity in American Indians and Alaska Natives,” *American Journal of Clinical Nutrition*, Vol. 53, No. 6, June 1991, <https://pubmed.ncbi.nlm.nih.gov/2031495/>.

⁷⁶ *Ibid*; Michelle Chino, Darlene Haff, and Carolee Dodge-Francis, “Patterns of Commodity Food Use Among American Indians,” *Pimatisiwin: A Journal of Aboriginal and Indigenous Community Health*, Vol. 7, Issue 2, 2009, https://digitalscholarship.unlv.edu/cgi/viewcontent.cgi?article=1050&context=env_occ_health_fac_articles.

⁷⁷ Vantrease.

⁷⁸ Pindus.

major changes was the widespread availability and use of commodity foods. The impact of those changes is highly evident today.”⁷⁹

And, the problem of food insecurity remains, with 1 in 4 Native people experiencing food insecurity.⁸⁰ Lack of income and assets exacerbates these problems. In 2016 the average monthly income for a four-person household participating in FDPIR was just \$1,586, or 78 percent of the federal poverty level.⁸¹ Only 5 percent of FDPIR households had assets valued at \$500 or more.⁸²

⁷⁹ Chino, Haff, and Dodge-Francis.

⁸⁰ Jernigan *et al.*

⁸¹ Pindus *et al.*

⁸² *Ibid.*; U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, “2016 Poverty Guidelines,” <https://aspe.hhs.gov/2016-poverty-guidelines>.

The Food Distribution Program on Indian Reservations

For Tribal communities, the Food Distribution Program on Indian Reservations (FDPIR) serves as an alternative to the Supplemental Nutrition Assistance Program (SNAP). Though people who live in Tribal communities may participate in SNAP on the same basis as other low-income people, FDPIR can more easily reach some Native families because SNAP-authorized stores and/or SNAP offices are not accessible in some reservation communities. Families may not participate in both SNAP and FDPIR.

To qualify for FDPIR, households must meet income eligibility requirements, which are similar to SNAP guidelines.^a Households must also reside on reservations or in approved areas close to reservations in Oklahoma. In fiscal year 2019, FDPIR monthly participation averaged 83,800.^b An estimated 1 to 3 percent of SNAP participants are AIAN, meaning roughly 170,000 to 500,000 AIAN participate in SNAP.^c

FDPIR addresses food insecurity by distributing commodities, as opposed to SNAP's EBT card. Every month, program participants select from over 100 commodities, which fall under ten broad categories: fruits, proteins, vegetables, legumes, traditional foods, grains, dairy, oils, seasonal items, and other, although many options are canned (e.g., beef and chicken, green beans, and peaches). The Department of Agriculture (USDA) spends about \$57 in food per month per FDPIR participant, or \$1.90 per day, compared to an average of about \$4.00 per day for SNAP participants.^d In partnership with the Department of Defense's Fresh Fruit and Vegetable Program, FDPIR enables families to also select from fresh fruit and vegetables, although produce quantity and quality can decline as the month progresses.^e Program delivery varies: for example, some participants pick up their commodity packages from warehouses, select items under a grocery store model, receive home deliveries, and "tailgate" foods from trucks driven to more remote locations.

Since 2002, the FDPIR Food Package Review Work Group has worked to improve the nutritional value of FDPIR packages and better meet participants' dietary preferences.^f The Work Group consists of 18 voting members (eight FDPIR program staff, four Indian Tribal Organization (ITO) representatives, four ITO nutrition/health experts, and two federal nutritionists) and six non-voting members (three USDA food ordering specialists and three FDPIR program staff). To reflect regional diversity, the Work Group's membership includes Tribal representatives from BIA regions across the country.

^a According to the Food and Nutrition Service, in fiscal year 2021 a family of four could not have a net monthly income in excess of \$2,365 (\$28,380 annually) to qualify for FDPIR.

^b U.S. Department of Agriculture, "Food Distribution Program on Indian Reservations."

^c Per 2018 American Community Survey (ACS) data, 1.5 percent of SNAP participants are AIAN, meaning roughly 200,000 AIAN people participated in SNAP in 2018. (See Tracy A. Loveless, "Supplemental Nutrition Assistance Program (SNAP) Receipt for Households," American Community Survey Briefs, June 2020, <https://www.census.gov/content/dam/Census/library/publications/2020/demo/acsbr20-01.pdf>.) However, the ACS undercounts SNAP participants so this number is likely higher. In addition, USDA SNAP administrative data have a more accurate count of SNAP recipients, but a high share of respondents do not report their racial or ethnic category. As a result, neither source provides an accurate count of AIAN participants. The 1-3 percent range provided is a CBPP estimate, a three-year average of the number of SNAP participants who are AIAN, for the years 2017 to 2019. It is calculated by applying the share of the population that is AIAN from the ACS to the share of SNAP participants from SNAP administrative data.

^d Megan Mucioki, Jennifer Sowerwine, and Daniel Sarna-Wojcicki, "Thinking inside and outside the box: local and national considerations of the Food Distribution Program on Indian Reservations (FDPIR)," *Journal of Rural Studies*, Vol. 57, 2018, <https://www.sciencedirect.com/science/article/pii/S0743016717304199>.

^e Nancy Pindus *et al.*, "Study of the Food Distribution Program on Indian Reservations," U.S. Department of Agriculture, June 2016, <https://www.fns.usda.gov/fdpir/study-fdpir-8>.

^f U.S. Department of Agriculture, "FDPIR Food Package Review Work Group," September 30, 2019, <https://www.fns.usda.gov/fdpir/fdpir-food-package-review-work-group>.

FDPIR in the 21st Century

In the past few decades, there have been significant improvements to FDPIR food packages. According to one participant, “[t]his is not the same FDPIR I knew as a kid.”⁸³ This is due in no small part to advocacy work by the National Association of FDPIR Programs and the Food Package Work Review Group, which was founded in 2002 and consists of Tribal members across the country as well as USDA staff.⁸⁴ A 2016 study surveyed participants and found that 90 percent were satisfied with the products in their food baskets.⁸⁵

In addition to expanding access to culturally relevant foods, recent demonstration projects have opened the door for integrating Tribally grown food into FDPIR packages; if maintained over the long term, these projects could have important economic development impacts. The 2018 farm bill authorized \$5 million for FDPIR demonstration projects, which would allow Tribal nations greater control over the food procurement process.⁸⁶ In 2021, USDA released \$3.5 million to eight Tribal nations, allowing them to contract with local Tribal producers and integrate local and Tribally grown food into FDPIR packages.⁸⁷

Despite these improvements, access to fresh, healthy food remains a problem. As explored above, on-reservation food prices tend to be higher than the national average. One study found that the share of FDPIR participants residing in census tracts that were “food deserts”⁸⁸ more than tripled between 2000 and 2010, and FDPIR participants had to drive an average of 17 minutes each way to reach food stores selling produce.⁸⁹ Of participants in this study, nearly one-third lacked access to a vehicle.⁹⁰ Another study found that, owing to the rural nature of many reservations, only 26 percent

⁸³ Pindus *et al.*

⁸⁴ *Ibid.*

⁸⁵ *Ibid.*

⁸⁶ Indigenous Food and Agriculture Initiative, University of Arkansas, and Native Farm Bill Coalition, “2018 Farm Bill Implementation Tracker: Where the Specific Provisions Stand at USDA,” October 20, 2020, <https://indigenousfoodandag.com/wp-content/uploads/2020/10/IFAI-2018-Farm-Bill-Tribal-Tracker.pdf>.

⁸⁷ U.S. Department of Agriculture, “USDA Invests \$3.5 Million to Provide Food Purchasing Options to Tribal Communities,” November 1, 2021, <https://www.fns.usda.gov/news-item/fns-0010.21>.

⁸⁸ The USDA defines food deserts as “low-income census tracts with a substantial number or share of residents with low levels of access to retail outlets selling healthy and affordable foods,” with criteria of high poverty rates (20 percent or greater, or median family income at/below 80 percent statewide or metro area median family income) and low food access (areas composed of 500 people or more, with 33 percent or more of population more than 1 mile from a supermarket or large grocery store, or in rural census tracts, 10 miles). See Michele Ver Ploeg, David Nulph, and Ryan Williams, Mapping Food Deserts in the United States,” U.S. Department of Agriculture, December 1, 2011, <https://www.ers.usda.gov/amber-waves/2011/december/data-feature-mapping-food-deserts-in-the-us/>.

There has been movement away from “food desert” terminology in favor of “food apartheid” or “retail redlining.” This is because the former naturalizes low food access through an ecological metaphor. This runs counter to the fact that low food access is rooted in decades’ worth of social, political, and economic history and decision-making that racially disinvested communities.

⁸⁹ Pindus *et al.*

⁹⁰ Pindus *et al.*

of all Tribal area populations were within walking distance (1 mile or less) of a supermarket, compared to 59 percent of the U.S. population overall.⁹¹

The quality of FDPIR produce also varies. One report described how “the availability of items was sometimes an issue and the quality of the products was not always good. . . . Many sites noted problems with produce upon delivery (e.g., damage or quality issues) from the vendors. Staff and participants at several sites noted that particular produce items would go bad quickly when taken home.”⁹² This is particularly unfortunate because the fresh food component of the program was incredibly popular among participants, pinpointed as one of FDPIR’s best features.

Policy Recommendations

In January 2021, USDA released a Request for Applications for the FDPIR 638 Self-Determination Project. If selected for the grant, Tribal organizations can participate in a demonstration project that gives them more control over the food procurement process, enabling them to source foods locally and from area Tribal producers. To date, eight Tribal nations have received \$3.5 million in USDA funding as part of the demonstration project.⁹³

Expanding this demonstration project and funding similar projects can serve two important purposes: 1) expanding access to local food and 2) creating economic opportunities for local Tribal producers. More generally, this can help Tribal peoples to regain their food systems and generate job and economic opportunities, allowing them to tailor programs to their unique and diverse needs.⁹⁴

Federal food assistance programs such as SNAP, the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and FDPIR provide job opportunities for agricultural producers. A USDA report determined that in an economic downturn, \$1 billion in new SNAP benefits would create nearly 500 full-time jobs in the agricultural sector, generating \$32 million in revenues for the sector, and would increase gross domestic product by \$1.5 billion.⁹⁵

Expanding FDPIR demonstration projects also could increase the stream of fresh and local foods in FDPIR food supplies. FDPIR participants surveyed for the 2016 report cited above suggested that increased incorporation of local foods and produce would increase access to fresh foods, improve variety, and help foods to last longer.⁹⁶ Tribes interviewed for another report cited numerous advantages in self-administration of nutrition programs, including engagement of Tribal

⁹¹ Phillip Kaufman, Chris Dicken, and Ryan Williams, “Measuring Access to Affordable Food in American Indian and Alaska Native Tribal Areas,” *Economic Information Bulletin*, No. 131, December 2014, https://www.ers.usda.gov/webdocs/publications/43905/49690_eib131_errata.pdf.

⁹² Pindus *et al.*

⁹³ U.S. Department of Agriculture, “USDA Invests \$3.5 Million to Provide Food Purchasing Options to Tribal Communities.”

⁹⁴ Janie Simms Hipp, Colby D. Duren, and Erin Parker, “Building Indian Country through Food, Agriculture, Infrastructure, and Economic Development in the 2018 Farm Bill,” *Journal of Food Law & Policy*, Vol. 14, No. 1, 2018, <https://scholarworks.uark.edu/cgi/viewcontent.cgi?article=1038&context=jflp>.

⁹⁵ Patrick Canning and Brian Stacy, “The Supplemental Nutrition Assistance Program (SNAP) and the Economy: New Estimates of the SNAP Multiplier.” U.S. Department of Agriculture, July 2019.

⁹⁶ Pindus *et al.*

sovereignty, increased ability to target community members in need, control and flexibility over nutritional quality of food, and ability to offer culturally relevant programming.⁹⁷

Developing the infrastructure and resources for Tribal nations to feed their people recognizes the decision-making powers of Tribes and works against policies of oppression that have curtailed Tribal sovereignty for centuries.

As Janie Simms Hipp wrote, “When Indian Country lost its ability to feed itself, through whatever means, we lost that part of ourselves that supports our ability to thrive. It is only by regaining our foods will we be able to restore our health, our resilience as peoples and secure the stability and diversification within our own communities and local economies.”⁹⁸ Federal nutrition policy has the potential to strengthen Indian Country. Expanding 638 authority would be an important step in catalyzing that process.

⁹⁷ Steven Garasky *et al.*, “Feasibility of Tribal Administration of Federal Nutrition Assistance Programs,” U.S. Department of Agriculture, July 2016, <https://impaqint.com/sites/default/files/project-reports/TribalAdministration.pdf>.

⁹⁸ Hipp and Pipestem.