

USDA TRIBAL ADVISORY COMMITTEE

FORMAL RECOMMENDATIONS TO THE SECRETARY OF AGRICULTURE AND RELEVANT COMMITTEES IN CONGRESS

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I. Executive Summary

USDA Tribal Advisory Committee – Mid-Year Recommendations | 2025

These mid-year 2025 recommendations from the USDA Tribal Advisory Committee (TAC) reflect critical, evidence-based priorities aimed at strengthening USDA programs, ensuring equity in agricultural policy, and advancing the agency's trust and treaty obligations to Tribal Nations. These recommendations emerge from sustained consultation and public comment periods with Tribal leaders, producers, and policy experts and address both longstanding structural barriers and urgent policy realignments. The TAC met in-person in Washington D.C. on May 7th and 8th to discuss and vote on recommendations, meet with key political appointees and staff, and hear public comment from producers and organizations across Indian Country.

Target Areas:

1. Equity in Access to Programs and Credit

The recommendations call for removal of restrictive eligibility criteria, such as the “one-year control” rule and historical production requirements, that prevent new, beginning, and Tribal producers from participating in conservation and cost-share programs. Expanded access to FSA credit, modernization of lending policies, and proper training on alternative collateral are essential to address persistent inequities in financing and land tenure.

2. Recognition of Tribal Sovereignty and Governance

A central theme is the alignment of USDA programs with Tribal laws, business structures, and land management plans. The TAC recommends that USDA formally recognize Agricultural Resource Management Plans (ARMPs), expand cooperative staffing with Tribal governments, and accept Tribal regulatory frameworks in areas such as intertribal trade and environmental planning.

3. Workforce and Service Delivery in Indian Country

The recommendations highlight urgent needs to maintain and expand USDA staffing in Indian Country, prevent FSA office closures, and enhance workforce efficiency in collaboration with Tribes. A strong emphasis is placed on restoring and bolstering the capacity of the USDA Office of Tribal Relations (OTR) and filling key advisory roles to ensure Tribal voices are fully represented.

4. Support for Livestock Producers and Rangeland Systems

Given that livestock production is the primary agricultural activity for AI/AN producers, the TAC urges USDA to revise conservation and disaster programs to better reflect the realities of

rangeland systems. Recommendations include separate ranking categories for livestock proposals and programmatic standards tailored to the ecological conditions of expansive rangelands.

5. Land Access and Intergenerational Transfer

Access to land remains a major barrier for beginning farmers. The TAC proposes Congress create tax incentives to facilitate intergenerational land transfers and land sales to new and beginning producers. The TAC also urges USDA to make greater use and reform of land consolidation programs, especially in Indian Country where fractionated land ownership inhibits productive use.

6. Strategic Partnerships with Native CDFIs

Native CDFIs serve as critical financial and capacity-building institutions in rural and Tribal areas that often lack access to traditional credit mechanisms. The TAC recommends increased USDA investment, including capital pools for re-lending, expanded partnership models, and greater recognition of CDFIs in USDA's rural development and credit access strategies.

7. Food Sovereignty, Local Procurement, and Nutrition

The Committee calls for flexible, regionally attuned local food procurement programs that support culturally appropriate diets and strengthen Tribal food systems. The TAC opposes the proposed transfer of USDA nutrition programs to HHS, warning of the disruptive impact on FDPIR and Tribal food security. Instead, USDA should retain leadership and coordinate closely with HHS to align nutrition with agricultural development.

8. Program Realignment and Restored Commitments

In response to terminated grants and disrupted initiatives, the TAC recommends reprogramming recaptured IRA and IIA funds into a new Tribal Discretionary Program administered by the Office of Tribal Relations. Such a move would realign USDA action with its stated commitment to Indian Country economic development.

These recommendations represent a forward-looking, practical roadmap for USDA and Congress to enhance the effectiveness and efficiency of agriculture and rural development policies across Indian Country. Through administrative action, legislative reform, and stronger intergovernmental partnerships, USDA can uphold its trust responsibilities while ensuring that Indian Country producers, governments, and businesses have full access to the tools of rural prosperity and a robust agricultural economy.

Introduction and Background

The TAC, authorized by the Agricultural Improvement Act of 2018 (7 U.S.C. 6921(b)), advises the Secretary on issues related to Indian agriculture, natural resources, economic development, and food systems and provides recommendations to relevant committees in Congress. These recommendations are grounded in listening sessions, consultations, and Tribal producer feedback. They reflect a deep commitment to reforming federal policies to better serve the needs of Tribal governments, Native producers, and Indian Country communities—key contributors to rural American economies. Tribal agricultural producers operate nation-wide, within and outside of reservation boundaries, and on all types of land. Market value of agricultural products sold by American Indian and Alaska Native producers nearly doubled from \$3.6 billion in 2017 to \$6.4 billion in 2022¹. This growth in the Tribal ag products bolsters local rural economies and food systems and is a signal of success in recent Tribal and Federal policy initiatives.

In December of 2024, the TAC issued its inaugural report to the Secretary and relevant committees in Congress. Through the formal process, feedback was received from agency and staffers on the Hill, and with the new Administration in place, the TAC felt it pertinent to issue a mid-year report with clarification provided on some recommendations, and newly-formed recommendations that align with the Trump Administration's priorities of government efficiency, protecting the small farmer, upholding Trust and Treaty obligations with Tribal Nations and bolstering rural America.

The document is organized by priority areas and offers specific programmatic, regulatory, and legislative actions to support equitable USDA service delivery across Indian Country, with a summary of recommendations outlined below.

Summary of Key Recommendations

- Remove restrictive eligibility requirements for conservation programs that burden new and beginning farmers.
- Mandate Tribal consultation on USDA workforce and reorganization changes.
- Offer tax incentives to support intergenerational land transfer to beginning farmers.

¹ National Agricultural Statistics Service (Issued February 2024). "Census 2022." https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1,_Chapter_1_US/usv1.txt

- Reform land consolidation programs and align USDA/BIA coordination.
 - Align USDA program eligibility with Tribal business formation under Tribal law.
 - Reduce bureaucratic barriers to intertribal trade and Tribal procurement.
 - Ensure equitable access to conservation programs for livestock producers.
 - Strengthen the role of Native CDFIs in USDA agricultural finance.
 - Expand access to credit via FSA loan reform, training, and office staffing.
 - Protect and invest in Tribal food systems and nutrition sovereignty.
 - Reinforce USDA Office of Tribal Relations (OTR) capacity and leadership.
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II. Detailed Recommendations by Priority Area

A. PRIORITY: CAPACITY AND SERVICE DELIVERY TO INDIAN COUNTRY IN THE TRUMP ADMINISTRATION

Background:

The USDA Office of Tribal Relations (OTR) plays a critical role in ensuring the Department upholds its trust and treaty responsibilities to Tribal Nations. This office serves as the central liaison for Tribal engagement across all USDA mission areas. As the Department seeks to advance its support for Indian Country under this administration, it is vital that OTR is fully staffed, sufficiently resourced, and led by a qualified appointee with deep experience in Tribal governance, federal Indian law, and intergovernmental affairs. Undermining the capacity of OTR through vacancies, insufficient funding, or misalignment in leadership weakens the Department's ability to consult effectively with Tribes and deliver responsive services. A serious commitment to Indian Country must begin with a serious investment in the office charged with carrying that responsibility.

Recommendation:

USDA should prioritize the immediate appointment of a qualified and experienced Director to lead the Office of Tribal Relations.

Recommendation:

USDA should prioritize the immediate hiring of vacant USDA Tribal Liaison positions within all agencies.

Recommendation:

The administration should commit to maintaining or increasing the budget of the Office of Tribal Relations to ensure it has the capacity to fulfill its role as a conduit between Indian Country and the Secretary/Department regarding programs and policies impacting Indian Tribes, and ensure the Department meets Tribal consultation requirements in collaboration with the Department's mission area programs and agencies.

Recommendation:

The USDA Tribal Advisory Committee Charter should be swiftly reauthorized to ensure the continuity of this body's statutory role in advising the Secretary on Tribal issues across USDA programs.

Recommendation:

The administration should move expeditiously to fill all vacant seats on the USDA Tribal Advisory Committee to ensure full regional and institutional representation, particularly for regions and institutional representation currently lacking a voting representative.

Recommendation: The TAC currently has a vacancy, formerly filled by a representative from a Tribal College and University (TCU). This vacancy should be expeditiously filled to ensure that the Committee hears concerns and understands the impacts of USDA and congressional action on TCUs. The current vacancy is required to be appointed by the ranking member of the House Agriculture Committee. Therefore, the TAC recommends to Congress that the current vacancy be filled with an individual with expertise in 1994 land grant institutions.

Recommendation:

The Secretary of Agriculture should work with the Secretary of Interior to expand the interagency Memorandum of Understanding to analyze additional areas of cooperation including, but not limited to: forestry and wildland firefighting; land access and ownership; water rights and infrastructure; and cultural resource protection and sacred sites.

Background: Tribal consultation is a unique part of the Nation-to-Nation relationship between the United States government and Tribal Nations. For the federal government to meet the trust obligations to federally-recognized Tribes in a way that is both efficient and effective, the US Government engages in consultations directly with Tribal Nations, ensuring the critical voice of Tribes are heard and the views of Tribal governments incorporated into decisions. Recently with EO 14210, the Administration announced a series of Tribal Consultations regarding Indian Affairs Workforce Efficiency and Productivity. Given the potential for forthcoming USDA reorganization, it is critical that USDA follow the Administration's lead and consult with Tribes on USDA Workforce Efficiency and Productivity as it relates to service delivery in Indian Country.

Recommendation: USDA should host a series of Tribal Consultations throughout Indian Country related to USDA workforce and programming changes, organizational structure, and efficiency for Tribes and Tribal producers prior to making final decisions.

B. PRIORITY: CONSERVATION PROGRAM ELIGIBILITY

Background: Some NRCS cost-shared practices, such as installing irrigation and hoop houses, may require that the producer has previously engaged in certain practices to be eligible for financial assistance. Some programs do not consider production for eligibility purposes, but do consider past management and practices in the ranking process. Further, NRCS programs sometimes require that the producer have “one year of control” of a tract whether owning or leasing, before enrolling in conservation programs. This is prohibitive for new and beginning farmers and ranchers, and for producers looking to modernize production and/or expand their operations. Further, this prohibits producers when generational lease transfers occur or when tribal leases are acquired by a Native lessee who may have experience on or control of other leased lands and discourages immediate conservation program enrollment.

Recommendation: USDA should remove historical practice, method, and/or production requirements from all cost-share program eligibility and ranking.

Recommendation: Remove “one year of control” requirements from all conservation programs to encourage new and beginner producer participation in conservation programs.

Legislative Reference: *"Irrigation. 16 U.S.C. 3839aa-2(h) authorizes funding for*

- Water distribution efficiency

- Irrigation related structural or other measures that conserve surface or groundwater

Prioritization of Payment. 16 U.S.C.aa-3(b)(4)

-Requires Secretary prioritize applications that improve conservation practices/systems in place on the operation at the time of the contract"

C. PRIORITY: LAND OWNERSHIP AND TRANSFER FOR NATIVE, NEW AND BEGINNING FARMERS AND RANCHERS

Background: From 2017 to 2022, the average age of the American farmer rose .6 years to 58.1 years of age (NASS). As farmers age out of production and land prices continue to skyrocket, new and beginning farmers and ranchers face numerous barriers to land access and operational sustainability. As the Administration looks to put American farmers and ranchers first, steps should be taken to ensure that American agricultural ground stays in American hands, and that laws and policies support the USDA's efforts geared towards incentivizing beginning farmers and ranchers.

Recommendation:

Congress should examine Title 26 of the US code to consider ways to incentivize landowners to sell or transfer agricultural ground to new and beginning farmers and ranchers. Lawmakers should consider reducing or eliminating Capital Gains taxes, Estate and Gift taxes, and other taxes related to the transfer or sale of agricultural land to reduce the tax burden of individuals or entities specifically transferring lands to American new and beginning farmers and ranchers. Provide *enhanced capital gains tax exclusions or deferrals* for landowners who sell or lease land to qualified beginning farmers and ranchers. Offer *estate tax credits or deductions* if agricultural land is sold or transferred to beginning farmers.

Suggested Legislative Language:

Section 1202A: Exclusion of Capital Gains from Sale of Agricultural Land to Beginning Farmers

(a) In General: Gross income shall not include 100% of any gain from the sale of qualified agricultural land to a qualified beginning farmer or rancher.

(b) Definitions:

(1) Qualified Agricultural Land: Real property used for farming purposes as defined in 26 CFR § 1.61-4.

(2) Qualified Beginning Farmer or Rancher: An individual who has materially participated in farming operations for 10 years or less.

Section 2057A: Deduction for Qualified Transfers of Agricultural Land

(a) Deduction Allowed: An estate shall be allowed a deduction equal to the value of any qualified agricultural land transferred to a qualified beginning farmer or rancher.

(b) Definitions:

(1) Qualified Agricultural Land: As defined in 26 CFR § 20.2032A-8.

(2) Qualified Beginning Farmer or Rancher: As defined in Section 1202A(b)(2).

Background: Fractionated land ownership continues to impact opportunities to put more land to agricultural production. The 2024 TAC Report included recommendations to continue funding programs that can be used to consolidate ownership of fractionated lands. Additional outreach is necessary to ensure Indian Country producers are aware of the programs, and that agency staff understand the programs available. Further assessment of the programs should be conducted in consultation with Tribal Nations to ensure bureaucratic barriers to program utilization are eliminated.

Recommendation: USDA should provide guidance to FSA and other offices servicing Indian Country related to these programs and encourage greater use of the programs to increase agricultural production through efficiencies in land ownership and management. The USDA should also work with BIA and USDOJ to combine programs to increase agricultural production.

Recommendation: Allotment consolidation programs should be evaluated to reduce administrative burdens and red tape for streamlined program utilization.

D. PRIORITY: FEDERAL PROGRAM ADMINISTRATION, TRIBAL LAW PARITY AND GOVERNMENT EFFICIENCY

Background: Indian Country businesses take many forms, including Tribal-government owned and operated entities, Tribal citizen owned and operated businesses, intertribal consortia businesses and various other forms. Many of those businesses are created under Tribal law. Those various businesses represent significant percentages of rural economies and contribute to rural economic self-sufficiency.

Recommendation: USDA programs and policies should align with Treasury and other programs that recognize businesses formed under Tribal law and the unique nature of many Indian Country businesses. This will reduce bureaucratic hurdles to rural economic self-sufficiency by ensuring Indian Country businesses are eligible for programs.

Background: Tribal Nations have always traded with each other and continue to do so. Unfortunately, government bureaucracy at times makes that trade more difficult, which impacts rural and Tribal economic self-sufficiency.

Recommendation: USDA should implement and/or develop programs and policies that reduce bureaucratic hurdles to intertribal trade, including through recognition of Tribal government regulations that achieve the same or similar purposes of federal regulations.

Background: National Forests and Grasslands are important to the exercise of Tribal treaty rights and contributors to rural economies. The Explore Act included additional partnership opportunities between the U.S. Forest Service and Tribal Nations, including the ability of tribes and counties to retain receipts from Good Neighbor Authority projects to help pay for additional land management. The Explore Act also included the ability to use GNA for recreation projects, including for work off National Forest System lands. The various partnership opportunities, however, have varying requirements, many of which make entering into those partnerships difficult.

Recommendation: USDA, in collaboration and consultation with Tribal governments, should conduct a comprehensive review of partnership programs available to Indian Country, determine what requirements may be barriers to entering into those partnerships and develop strategic plans to eliminate those barriers.

E. PRIORITY: AGRICULTURE RESOURCE MANAGEMENT PLANS

Background: Tribes are required by 25 U.S.C. § 3711 to develop Agricultural Resource Management Plans (ARMPs) to govern the use of agricultural lands, but USDA doesn't formally recognize these plans when reviewing eligibility or designing programs.

Recommendations:

USDA should recognize ARMPs as Programmatic Baselines

- Accept Tribal ARMPs in lieu of Environmental Quality Incentives Program (EQIP) conservation plans, eliminating duplicative planning.
- Authorize ARMPs to qualify lands for eligibility under NRCS, RD, and FSA programs.
- ARMP Funding Collaboration
- Allow USDA to cost-share ARMP development under CSP, EQIP, or Tribal Technical Assistance Initiative funds.
- Joint USDA-BIA training and certification for ARMP authors (including Tribal conservation staff or consultants).
- Include monitoring and adaptive management support through local USDA field offices.

F. PRIORITY: CREDIT ACCESS REQUIRES EXPANDED USDA PRESENCE AND FARMER-FIRST LENDING REFORM**Background:**

Indian Country includes some of the most remote and economically under-resourced regions of rural America. These areas are often true “credit deserts,” where producers—Tribal and non-Tribal—face systemic challenges accessing capital. In this context, USDA’s Farm Service Agency (FSA) plays an indispensable role, often serving as the only lender of last resort for producers. Yet FSA and Bureau of Indian Affairs (BIA) field offices remain chronically under-staffed or at risk of closure, which compounds the existing inequities in rural service delivery.

Furthermore, outdated FSA lending policies continue to present unnecessary barriers to new and beginning farmers, including Native producers seeking to enter or expand agricultural operations. Many of these barriers could be removed through targeted, no-cost legislative actions—steps that would modernize lending criteria, expand access to credit, and support long-term land tenure and farm viability.

Recommendations to Administration:

USDA should prioritize maintaining and expanding staffing levels and services at FSA and BIA offices that serve Indian Country, particularly in credit-deprived rural areas.

USDA should develop and implement a strategy to prevent the closure or consolidation of FSA and BIA offices in rural Tribal communities, ensuring continued local access to essential agricultural and financial services.

Recommendations to Congress to Support Farmer-First Lending Reform:

Congress should take swift, bipartisan action to enact the following no-cost legislative reforms to modernize FSA lending and enhance rural access to credit:

- Eliminate Direct Farm Ownership and Operating Loan term limits by eliminating the cap on the number of times a borrower can get a Direct Operating or Direct Farm Ownership loan.
- Authorize refinancing of debt as a direct Farm Ownership loan program purpose.
- Increase the Direct Beginning Farmer Down Payment Loan Program Loan Limit to match the Direct Farm Ownership loan limit.
- Remove the Emergency Loan program requirement for written credit denial and adjust the production loss percent threshold from 30 percent to an amount to be determined by the Secretary.
- Remove prohibition of new loans for applicants that have received debt forgiveness when at least 7 years have passed since receiving debt forgiveness.
- Reduce the Direct Farm Ownership loan requirements to require an applicant to have one year of farming experience (and not three), or that the applicant have an established relationship with a mentor approved by the Secretary, or is a veteran who has been honorably discharged.
- Increase the lifetime limitation on debt forgiveness per borrower from \$300,000 to \$600,000.
- Increase the Microloan Limit from \$50,000 to \$100,000.
- Modify the statutory language describing the interest rate requirements for limited resource loans, microloans to beginning farmers and veteran farmers, and Indian Tribal Land Acquisition loans, including the establishment of an interest rate ceiling.
- Revise beginning farmer definition to require individuals of an entity to be beginning farmers without regard to relationship.
- Require Preferred Guaranteed Lenders to obtain concurrence to foreclosure by removing the authority of preferred certified lenders to initiate liquidation without Farm Service Agency concurrence.
- Provide flexibility on the use of funds reserved for Beginning Farmers by revising beginning farmer lending targets required to “to the extent practicable.”

Together, these actions would significantly expand credit access in underserved areas while reaffirming the federal trust responsibility to Tribal producers and supporting the broader economic resilience of rural America.

G. PRIORITY: IMPROVING FSA CREDIT ACCESS THROUGH STAFF TRAINING ON ALTERNATIVE COLLATERAL

Background:

FSA policy does permit the use of alternative forms of collateral, offering potential flexibility for

borrowers who cannot or prefer not to collateralize trust or restricted lands. This flexibility is particularly important in Indian Country, where the use of trust land as collateral is often legally complex, administratively burdensome, or culturally sensitive. However, many FSA credit staff across the country remain undertrained or unaware of these alternative options. As a result, Native producers are routinely told they are ineligible for financing, not because of policy, but due to inconsistent application or lack of staff knowledge. Page 60 of USDA's own borrower guide acknowledges trust land issues but offers little practical guidance, highlighting the broader gap in actionable training and technical understanding at the field level.

Recommendation:

USDA should require and implement targeted training for FSA credit staff on existing policies related to alternative collateral acceptance, with a focus on increasing credit access for Native producers and reducing dependence on trust/restricted land collateralization.

H. PRIORITY: STRENGTHENING THE ROLE OF NATIVE CDFIs IN RURAL AND TRIBAL AGRICULTURAL FINANCE

Background:

Community Development Financial Institutions (CDFIs), and specifically Native CDFIs, are essential to building economic resilience in Tribal and rural communities where traditional commercial lenders are often unwilling to operate. Native CDFIs improve creditworthiness, expand small business development, and fill critical capital gaps left by USDA lending restrictions or risk tolerance thresholds. In many areas of Indian Country, Native CDFIs are the only financial institutions actively working to build producer capacity, provide financial literacy, and move borrowers along the continuum toward USDA eligibility. Yet, USDA investment in these partners has been sporadic and underleveraged.

If the USDA is to uphold a true “Farmers First” platform—one that lifts producers by way of true rural prosperity—then it must prioritize stronger collaboration with Native CDFI networks and increase federal investment in capital pools specifically intended for re-lending through these trusted institutions.

Recommendation:

USDA and Congress should prioritize formal engagement with Native CDFIs and the Native CDFI Network by:

- Expanding USDA partnerships with CDFIs to co-deliver credit and technical assistance;
- Increasing appropriations and programmatic resources for USDA relending programs targeted to CDFIs; and
- Establishing dedicated re-lending capital pools to support Native CDFIs in serving producers excluded by traditional credit systems.

I. PRIORITY: REDIRECTION OF FUNDING TO REAFFIRM FEDERAL COMMITMENT TO ECONOMIC DEVELOPMENT

Background:

Recent communications from the USDA and the President have reaffirmed a federal commitment to advancing economic development in Indian Country. However, administrative terminations of grants and contracts—many of which involved Tribes or Tribal-serving organizations as subawardees—have disrupted ongoing efforts designed to build Tribal economies. These terminations contradict the stated policy priorities of both the Secretary and the President. Notably, while the grants have been terminated, the associated funds from the Inflation Reduction Act (IRA) and Infrastructure Investment and Jobs Act (IIJA) have not been rescinded. This presents a key opportunity for the Department to realign action with intent by reallocating recaptured funds into a new, Tribally-focused mechanism. Establishing a Tribal Discretionary Program within the Office of Tribal Relations (OTR) would allow for rapid response to community-identified needs and provide continued support for economic development efforts interrupted by administrative action. Additionally, expanding USDA-Tribal cooperative staffing agreements would build local capacity, fill critical staffing gaps, and enhance program delivery in Indian Country.

Recommendation:

USDA should complete a comprehensive assessment in consultation and coordination with Tribes of terminated contracts and grants that impacted Indian country and work to reverse those terminations to provide funding directly to tribes, tribal organizations and Native Hawaiian entities.

Recommendation:

USDA should also complete an assessment of federal workforce reductions that negatively impact Indian country and take action to reverse those impacts through increased hiring, contract with Indian Country technical assistance providers, and increased funding to tribal governments to directly implement those programs.

Recommendation:

USDA should reprogram recaptured IRA and IIJA funds from terminated contracts and grants into a Tribal Discretionary Program administered by the Office of Tribal Relations to advance economic development in Indian Country.

Recommendation:

USDA should expand cooperative staffing agreements and joint position funding with Tribal governments, particularly to support Tribal Departments of Agriculture and Natural Resources in building local capacity and delivering USDA programs more effectively.

J. PRIORITY: PARITY FOR LIVESTOCK PROGRAMS IN USDA PROGRAMS

Background:

The most recent USDA Ag Census data confirms that the majority of American Indian and Alaska Native (AI/AN) agricultural producers specialize in livestock production. Despite this, federal disaster assistance and market access programs have often been structured with a crop-centric approach, leaving livestock producers—especially those in Indian Country—underserved or excluded. Programs developed under this Administration to address disaster recovery, supply chain resilience, and market access must be inclusive of the livestock sector. If the USDA is to fulfill its obligation to equitably serve Indian Country and honor its commitment to placing all American farmers first, it must ensure that livestock production is not treated as an afterthought in the design and deployment of economic development and disaster response efforts.

Recommendation:

USDA should ensure that all disaster assistance funding and programmatic services, including market access expansion efforts, are explicitly inclusive of livestock producers and do not disproportionately favor crop producers.

K. PRIORITY: RANKING AND FUNDING FOR LIVESTOCK PRODUCTION SYSTEMS**Background:**

While livestock production remains the predominant agricultural activity for American Indian and Alaska Native producers, current USDA conservation cost-share programs remain heavily oriented toward crop-based systems. This imbalance neglects the realities of vast, intact rangelands that form the foundation of sustainable livestock production across much of Indian Country and the broader West. These ecosystems, though non-farmable, are vital to national conservation goals, carbon sequestration, and resilient rural economies. Yet, conservation practices designed for cropland often fail to address the scale, complexity, and ecological conditions of rangeland systems. Moreover, livestock integration in crop systems is a proven soil health driver, but conservation program design does not sufficiently incentivize or prioritize these integrated management strategies. Without programmatic adaptations and dedicated ranking categories, rangeland conservation proposals are consistently deprioritized in funding decisions—further marginalizing Tribal and rural livestock producers.

Recommendation:

USDA should revise conservation cost-share standards and practice scenarios to increase their relevance to expansive rangeland and livestock systems, ensuring that these practices are eligible for meaningful and equitable support.

Recommendation:

USDA should establish separate ranking categories for livestock conservation proposals, including those related to rangeland and grazing systems, to prevent systematic deprioritization relative to cropland-focused applications.

Recommendation:

USDA should use Ag Census and other relevant data to inform the equitable design of new initiatives, ensuring adequate support for the livestock sector—especially in Indian Country where it is a dominant agricultural activity.

III. Conclusion

The USDA Tribal Advisory Committee extends its sincere appreciation to the Administration, the dedicated staff of the USDA Office of Tribal Relations, and our partners across USDA and Congress for their continued engagement and support of enhancing USDA programs for Tribal producers. Your collaboration is essential in shaping a future where Tribal sovereignty, food security, and self-determination are central pillars of USDA policy and practice. The TAC would like to reaffirm the critical role of meaningful Tribal Consultation; not as a procedural formality, but as a foundational tool for guiding Indian Country policy including USDA program delivery. These Official 2025 Mid Year Recommendations, ratified by the Tribal Advisory Committee in May of 2025, reflect the TAC's commitment to engaging stakeholders, working with the Administration to advance shared priorities, providing guidance to the Secretary and relevant committees and Congress per our Charter, and moving Indian Country forward. We look forward to continued partnership in this shared commitment to a stronger, more resilient rural America.

For follow-up questions, please do not hesitate to reach out to me at (918) 533.8813 or tkissee@muscogeenation.com.

Respectfully,



Trenton Kissee, *Chair*



Meagen Baldy, *Vice Chair*