DATE: July 15, 2015

MEMO CODE: TA 01-2015

SUBJECT: Child Nutrition Programs and Traditional Foods

TO: Regional Directors
    Special Nutrition Programs
    All Regions
    State Directors
    Child Nutrition Programs
    All States

Recently several representatives of Native communities have inquired about serving traditional foods in Child Nutrition Programs (CNPs). In particular, Native communities are interested in knowing which traditional foods are allowed and how these foods may contribute towards a reimbursable meal.

The United States Department of Agriculture (USDA) understands the importance of serving traditional foods and encourages Indian Tribal Organizations, along with all operators of CNPs, to source locally grown and raised foods. The purpose of this memorandum is to clarify that traditional foods may be served in CNPs and to provide examples of how several traditional foods may contribute towards a reimbursable meal.

The Role of the Food Buying Guide (FBG)

The FBG is an essential tool that provides information for: 1) planning and calculating the required quantities of food to purchase for school meals, and 2) determining the specific contribution each food makes toward the meal pattern requirements. The FBG enables school food authorities and other institutions participating in CNPs to comply with the Dietary Guidelines for Americans and ensure that the meal pattern requirements are met for each component of a federally reimbursable meal (http://www.fns.usda.gov/tn/Resources/foodbuyingguide.html).

Currently, the Food Buying Guide for Child Nutrition Programs is being updated, in phases, to include resources for the new Nutrition Standards for School Meals. Updated meal pattern requirements for other CNPs such as Child and Adult Care Food Program and Summer Food Service Program are available on the FNS Web site at: http://www.fns.usda.gov/school-meals/child-nutrition-programs.
### Crediting Traditional Foods

While the FBG provides a relatively comprehensive list of products commonly served in CNPs, it does not provide yield information on every possible food served in reimbursable meals. Foods not listed in the FBG may be served in CNPs. However, if a food is served as part of a reimbursable meal, but not listed in the FBG, the yield information of a similar food or in-house yield may be used to determine the contribution towards meal pattern requirements. When this is the case, traditional foods can credit like similar products found in the FBG, as demonstrated below:

<table>
<thead>
<tr>
<th>Traditional Foods</th>
<th>Crediting in the Food Buying Guide[^1]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wild Rice (sprouted, puffed, flour)</td>
<td>• Credits the same as other grain items.</td>
</tr>
<tr>
<td>Blue Cornmeal (mush)</td>
<td>• Grain contribution may be calculated using grams of creditable grains (16g) or Exhibit A[^2].</td>
</tr>
<tr>
<td>Native Whole Blue Corn Kernel (ground into a flour)</td>
<td>• Sprouted or puff forms of wild rice belong in Exhibit A Group H[^2].</td>
</tr>
<tr>
<td>Native Whole Blue Corn Kernel (not ground into a flour)</td>
<td>• Credits as a starchy vegetable</td>
</tr>
<tr>
<td>Native White Corn</td>
<td>• Yield information for regular corn may be used to determine the credit.</td>
</tr>
<tr>
<td>Ground Bison Buffalo</td>
<td>• FBG contains yield information for ground buffalo; the same yield may be used to determine the credit[^3].</td>
</tr>
<tr>
<td>Venison</td>
<td>• FBG contains yield information for ground venison; the same yield may be used to determine the credit[^3].</td>
</tr>
<tr>
<td>Sheep</td>
<td>• FBG contains yield information for lamb; the same yield may be used to determine the credit.</td>
</tr>
</tbody>
</table>

[^1]: All crediting guidance is applicable to all items listed under the Traditional Foods column.
[^2]: See Memo SP 30-2012 Grain Requirements for the National School Lunch Program and School Breakfast Programs.
[^3]: If whole cuts are used instead of ground meat, the yield information for a similar beef cut may be used to calculate crediting.
When traditional foods that contribute towards the meal pattern requirements are not listed or do not have a similar comparison in the FBG; then in-house yields may be developed and used. Instructions for developing yields are available in the introduction section of the FBG, page I-3, at: http://www.fns.usda.gov/sites/default/files/FBG_introduction_0.pdf.

**Traditional Foods That Do Not Contribute Towards the Meal Pattern Requirements**

Not all traditional foods meet the nutrition standards and contribute towards a reimbursable meal. Please be aware, traditional foods that do not contribute to a specific meal pattern requirement (i.e., meats/meat alternatives, grains, fruits, or vegetables component) may be served, but will not credit toward a reimbursable meal. When served, these foods must be accounted for when assessing compliance in the weekly nutrient analysis and count toward dietary specifications (limits on calories, saturated fat, sodium, and *trans* fat). For example, acorns do not credit due to their low protein content. The acorns may be served with a reimbursable meal, but will not contribute towards meal pattern requirements, and would be included in the nutrient analysis.

Traditional foods may also be used during taste tests or other educational opportunities outside of the meal programs. To help children learn more about where their food comes from, USDA encourages schools to provide agriculture, agroforestry, and nutrition education.

**Game Meats**

Meat from cultivated game animals and wild game animals, including bison, venison and reindeer, may be served in CNPs; however, animals need to be slaughtered and inspected in a Federal inspected facility, State inspected program, or be from an approved source as established by the State and local regulatory authority that licenses and inspects food service operations. Please note that State and local authorities may have stricter regulations, preventing the service of cultivated and wild game animals.

**Additional Questions**

In keeping with our intent to encourage inclusion of traditional foods in USDA’s CNPs, we would like to hear about additional issues or concerns so that we may continue to provide technical assistance as necessary. For additional guidance concerning this memorandum, please contact your regional Farm to School Coordinator ([http://www.fns.usda.gov/farmtoschool/usda-farm-school-staff](http://www.fns.usda.gov/farmtoschool/usda-farm-school-staff)) or USDA’s Office of Tribal Relations ([http://www.usda.gov/wps/portal/usda/usdahome?contentid=contact-otr.xml](http://www.usda.gov/wps/portal/usda/usdahome?contentid=contact-otr.xml)) for assistance.

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