About this Toolkit
This toolkit was funded through the support of Montana No Kid Hungry and written by the Indigikitchen team.

Tribal Nations in Montana
Montana is home to twelve tribal nations and over 25,000 Native students in kindergarten through high school.

What are Indigenous Foods?
A guide to the basic traditional foods of Montana.

Incorporating Indigenous Foods
How to begin to create recipes and ensure nutritional guidelines are met.

Meal Pattern and Crediting
A guide to crediting traditional foods with which you may be unfamiliar.

Menu Planning
How to introduce Indigenous foods to your regular menu cycle.

Procuring Traditional and Local Foods
A guide to state and federal procurement guidelines.

Native Agricultural Producers and Processors
A short list of Indigenous producers from which to purchase foods for your school lunch program.

Montana School Success Stories
How four schools in Montana are incorporating fresh and Native foods.

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About this Toolkit

This toolkit was created to help food service directors identify, procure, and successfully incorporate traditional, healthy foods into their breakfast and lunch programs. It is also a teaching tool to educate those interested in traditional foods about American Indian nations and tribal communities.

In 2021, Indigikitchen was awarded a grant through Montana No Kid Hungry to develop this toolkit. The grant had two main goals:
1. Increase the incorporation and consumption of traditional foods in USDA School Meals Programs, and
2. Provide hands-on educational opportunities for four reservation schools in Montana to practice incorporating Native foods into their school meal programs.

By serving meals with Indigenous foods, schools help recognize ancestral wisdom, diverse cultural flavors, and honoring the gifts of the land. In developing this toolkit, Indigikitchen partnered with Hardin Public Schools, St. Ignatius Public Schools, Browning Public Schools, and St. Labre Schools. The partnership resulted in a collaboration on Indigenous recipes and other topics including procurement, USDA Foods, menu planning, recipe development, the USDA Food Buying Guide (FBG), crediting, and standardized recipes. The training highlighted USDA and Office of Public Instruction (OPI) resources and programs to support the inclusion of traditional foods in school meals.

The experiences and feedback shared during and after the trainings provided valuable insight and guidance, which led to the creation of videos and this toolkit. There are five educational videos, all of which are geared towards students. Each of these five videos focus on a specific traditional food and are encouraged to be used for nutrition education. The videos and this toolkit can be found on the Montana No Kid Hungry website and the Indigikitchen website.
Montana’s Indigenous People
Montana is home to approximately 78,000 people of American Indian heritage, or 6.5 percent of the state’s total population. Of these, over 20,000 are students in Montana schools. The twelve American Indian tribes in Montana are recognized as nations by the United States. This recognition is evident through treaties between the sovereign nations and the US. The Little Shell Chippewa Tribe, which has no reservation in Montana, received federal recognition in December of 2019. Montana is also home to many Indians of other tribes living on and off the reservations. Each of these tribal nations has its own culture, language, identity, and history which continue to be important to their individual and collective identity today despite many changes over the last two centuries.
What are Indigenous Foods?

From the mountain forests to the sagebrush steppe, Indigenous people incorporated hundreds of foods into their diets.

Traditional foods are those that have been traditionally prepared and consumed by American Indian people and nations. The following are examples of common, traditional foods in Montana that may be served in USDA School Meals Programs:

- Berries (chokecherries, raspberries, huckleberries, serviceberries, strawberries, thimbleberries, rosehips)
- Prairie turnips, camas, and other root vegetables
- Bison
- Fish (walleye, sturgeon, trout, salmon)
- The Three Sisters (corn, beans, and squash)
- Birds including grouse, duck, and geese
- Prickly pear cactus
- Traditional teas and seasonings (cedar, yarrow, peppermint, bee balm)

Traditional Berries
Montana is home to over a dozen edible berries. The most famous are huckleberries, serviceberries or juneberries, wild strawberries, thimbleberries, raspberries, and chokecherries. However, gooseberries, currants, buffalo berries, and rosehips are also delicious edible berries that you can find across the state. Cranberries, blueberries, and blackberries are native to other parts of the While most berries ripen in the late summer, they can be dried, frozen, or made into jams, jellies, and syrups for use throughout the year. Berries are generally low in calories and high in fiber, vitamin C, and antioxidants.

Root Vegetables
Native people in Montana traditionally ate a number of root vegetables. These include our state flower, the bitterroot, camas bulbs, prairie turnips, fernleaf-biscuitroot, and nine-leaf biscuit root. Some of these can be eaten raw, like prairie turnips, and some require extensive slow cooking or roasting to convert the inulin into edible carbohydrates. Camas is a great example of this. Generally, these roots are starchy but can provide a valuable source of vitamin C, magnesium, and selenium.

Bison
As the largest mammal in North America, bison have been central to Indigenous food systems for millennia. Hundreds of years ago, millions of bison roamed throughout North America and were key to shaping and maintaining the plains and prairies through grazing, fertilizing, and trampling. Today, North America is home to roughly 500,000 bison and the bison has become the National Mammal of the United States. Bison were critical to the survival of American Indians, supplying their food, shelter, and tools. All parts of the bison can be used including the tendons and muscles for bowstrings; rawhide for masks, snowshoes, rafts, and shields; tails for decorations and medicine; and blood for paints and soups. American Indians see bison as a sacred, spiritual animal. In restorative efforts today, American Indian nations across the country protect this animal by maintaining private herds.

Prickly Pear
Prickly Pear is a very flexible food source. Both the pads, sometimes called nopales, and the fruit, called tunas, are edible. However, you must be very careful with both harvesting and preparation. Both the pads and fruit have tiny hair-like barbed thorns that are referred to as thorns or “glochids.” These easily detach and will lodge in skin. You must remove the spines before cooking with the prickly pears. Prickly pears were used to cure ailments from indigestion to burn wounds, the cactus had all the answers.

The fruit is a great source of different vitamins and minerals, depending on the color of the fruit. Both yellow and red types of fruit have high counts in vitamin C and calcium. They are also high in dietary fiber, which explains why they helped with indigestion. They also contain a high amount of kaempferol, which is an additional aid against cancer and heart disease, and many antioxidants and proteins that aid the body against infection and other maladies. Beyond that, they are also low in sugars, making the fruit a healthy treat.
Above: drying herbs

Montana is home to a number of native bird species that have traditionally been used for food. Dusky (Blue) Grouse, Ruffed Grouse, Sage Grouse, Sharp-tailed Grouse, and Spruce Grouse are all upland species that spend the winters in the state. Migratory birds like ducks and geese have also been eaten and provide a valuable source of fat. Without a doubt, duck and geese meat is high on protein and iron just like chicken. However, it is also rich in other nutrients like niacin and selenium. Both of these provide powerful boosts to your immune system. Duck provides almost three times more vitamin B1 and over two times more vitamin K than chicken. Other vitamins found in higher amounts in duck meat include vitamin B2, vitamin E, vitamin A, and folate. Duck also contains vitamin D, which is absent in chicken.

Teas and Seasonings

It should not be a surprise that several native species of plants can be used to make tea or season food. These include a number of coniferous trees like western red cedar, lodgepole pine, juniper, douglas fir, and subalpine fir. Peppermint and bee balm (wild bergamot) make flavorful teas but can also be used in the spice cabinet. Common yarrow, found in almost every location across the state, is a tea, a spice that tastes similar to tarragon, and a blood clotting agent useful in field medicine. While not typically treated as a tea, juniper berries are both spicy with pine notes and pair well with caraway, garlic, marjoram, pepper, and rosemary. Smooth sumac, Rhus glabra, has berries which can be ground down into a spice or used to make a lemonade-like drink.

Raspberry plants can be used for more than just the fresh berries as their leaves make a delicious tea that Native people have long used. Similarly, elderberries themselves can be brewed into a tea that is both flavorful and has antiviral properties. This tea is especially nice during flu season.

Fish

Montana is home to 59 native species of fish, many of which have traditionally been eaten by native people. Lake trout, walleye, bull trout, and cutthroat trout are all delicious, though the latter two are suffering declining populations while the first is now considered invasive in watersheds where it has been introduced. Fortunately, Montana fish are readily accessible and are often high in omega-3 fatty acids and provide vitamins such as D and B2 (riboflavin). Fish is rich in calcium and phosphorus and a great source of minerals, such as iron, zinc, iodine, magnesium, and potassium.
Each American Indian nation in Montana has its distinctive traditions surrounding food. These customs and practices can be integrated into USDA School Meals Programs using the examples, lessons, and menu planning tools which follow. This portion of the tool kit provides the basics on the breakfast and lunch meal patterns, crediting, and menu planning tools to aid in the introduction of the previously-mentioned traditional foods into school meal programs.

Designed to encourage healthy food choices by children, the National School Lunch Program (NSLP) and School Breakfast Program (SBP) meal patterns are based on the latest nutrition science. Found on OPI’s NSLP Menu Planning webpage, the meal patterns focus on including whole grains, offering more fresh fruits and vegetables, reducing sodium, restricting saturated fat and calories, and eliminating trans-fats in all products served to students.

Required Food Components

<table>
<thead>
<tr>
<th></th>
<th>Breakfast:</th>
<th>Lunch:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grain</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fruit</td>
<td></td>
<td>Meat/Meat Alternate</td>
</tr>
<tr>
<td>Milk</td>
<td></td>
<td>Fruit</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Vegetable</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Milk</td>
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</tbody>
</table>

The Food Buying Guide (FBG) is the indispensable tool for food yield information for all child nutrition programs (CNPs). While the FBG provides a fairly comprehensive list of products regularly served in CNPs, it does not provide data on every possible food served in reimbursable meals. However, foods not listed in the FBG may still be served in CNPs. In that case, the yield information of a similar food or in-house yield may be used to determine the contribution towards meal pattern requirements. Traditional Indigenous foods can credit like similar products found in the FBG, as demonstrated in Table 1 on page 14.

Instructions for developing yields are available in the introduction section of the FBG, page I-3.

Meat/Meat Alternate (MA)
The M/MA component allows for a variety of protein options, both vegetarian and non-vegetarian. Typically, meat, fish, and poultry in their natural states (i.e. unbreaded, no fillers or additives) will credit ounce-for-ounce. This means that one ounce by weight will credit as one ounce equivalent (oz eq) M/MA. Common M/MA in Native communities that may be served at breakfast or lunch are listed Table 2 on page 16.

Bison
Bison is an excellent food source and is low in fat and high in protein. According to the USDA Nutrient Database bison that is cooked, ground, and grass-fed is lower in calories, fat, saturated fat, and sodium, compared to cooked, ground beef. Bison is a leaner protein option that will help menu planners stay within the weekly dietary specifications of fat, saturated fat, and calories, while incorporating a
Traditional Foods

Wild Rice (sprouted, flour)
Blue Cornmeal (mush)
Native Whole Blue Corn Kernel (ground into a flour)

Native Whole Blue Corn Kernel (not ground into a flour)
Native White Corn

Ground Bison

Crediting in the Food Buying Guide

Credits the same as other grain items
Grain contributions may be calculated using grains of creditable grains (16g) or Exhibit A Sprouted or puff forms of wild rice belong in Exhibit A Group H

Credits as a starchy vegetable
Yield information for regular corn may be used to determine the credit.

FBG contains yield information for ground buffalo, the same yield may be used to determine the credit.

Table 1: Examples of traditional food crediting

Serving traditional foods like trout can be a great way to meet meat/meal alternate requirements while purchasing from a local supplier and supporting healthy student nutrition

Beans
Beans are a traditional food known as legumes. Legumes include cooked dry beans and peas, such as black beans, black-eyed peas (mature, dry), edamame (soybeans), garbanzo beans (chickpeas), kidney beans, lentils, navy beans, soybeans, split peas, and white beans. Legumes may credit as either meat/meat alternates component or the vegetables component, but one serving cannot credit as both components in the same meal or snack.

Nuts/Seeds
Native people have traditionally eaten a number of nuts and seeds including sunflower seeds, pumpkin seeds, black walnuts, hickory nuts, pecans, hazelnuts, and beech nuts.

While nuts and seeds can be creditable as a meat alternate, they can only account for half of the daily requirements for M/MA. One quarter cup of nuts/seeds will credit as 1.0 oz eq.

Fish
Fish is a significant protein source consumed by tribal communities in Montana. Different types of freshwater fish such as sturgeon, salmon, steelheads, walleye, and trout are common in Montana and may be served in USDA School Meals Programs. Typically, one ounce of cooked fish in its natural state (i.e., unbreaded, no fillers or additives) will credit as 1.0 oz eq M/MA. Other fish products that are processed or breaded require additional crediting documentation, such as a Child Nutrition (CN) Label or a Product Formulation Statement (PFS). Fish can be incorporated into menus as either baked, broiled, grilled, or roasted. It can be served by itself or in a mixed dish like fish stew, fish wraps, or fish tacos.

Bison may be incorporated into menus in a variety of ways. It can be substituted for ground beef or turkey, or used as a 50/50 blend of bison and beef in meat sauces, soups, or chili recipes. One ounce of cooked bison by weight will credit 1.0 oz eq M/MA. To view information, such as the yield of raw-to-cooked bison, use the Game, Buffalo, Ground entry of the FBG. For more information on incorporating bison into school meals, visit the Intertribal Buffalo Council’s Incorporating Bison Meat into the Schools’ Lunch Menu.

Saturated fat, and calories, while incorporating a traditional food.

FBG contains yield information for ground buffalo, the same yield may be used to determine the credit.
Whole Grains

USDA School Meals Programs require schools to serve whole grain-rich products. This means 51 percent or more of the grain in the product is whole grain. There are different ways to determine whether a product is whole grain-rich:

- The product label includes a Whole Grain Stamp indicating a whole grain content of at least 8.0 grams per oz eq.
- The product packaging includes the following Food and Drug Administration (FDA) whole grain health claim: “Diet rich in whole grain foods and other plant foods and low in total fat, saturated fat, and cholesterol, may reduce the risk of heart disease and certain cancers.”
- The product’s first ingredient (or second, after water) on the ingredient list is a whole grain.

If the product is whole grain-rich using any of the methods above, it may be credited using Exhibit A: School Lunch and Breakfast. This is a table that separates commonly used grains into groups based on how much creditable grain they contain per serving, on average. Exhibit A provides information regarding the grams or ounces per 1.0 oz eq for each specific group. The table below shows how some traditional grains credit toward the meal pattern.

### Wild Rice

While wild rice is not considered native to Montana, it has been eaten by Native people in the Great Lakes region for thousands of years and can be procured from Native suppliers. Wild rice by itself is a whole grain and has numerous health benefits. It is a rich source of dietary fiber, antioxidants, vitamins, and minerals. In addition, wild rice is higher in protein than other whole grains and is an excellent source of B vitamins.

Wild rice credits the same as any other grain. It may be calculated using grams of creditable grains by weight; one ounce of dry wild rice or one-half cup serving of cooked wild rice credits as 1.0 oz eq grain.

### Nixtamalized Corn

Hominy is whole, dried corn kernels treated with a high-alkaline solution (lye, ash) to soften the kernels’ skin. It is traditionally served as a vegetable or as a milled grain product (e.g., hominy grits). Masa is ground hominy made into flour, which can be used to make tortillas. According to USDA policy memo SP 34-2019 these ingredients may credit towards the vegetable or grain component.

Crediting:

- ¼ cup canned, drained or cooked, whole hominy (from dried) credits as ¼ cup starchy vegetable.
- ½ cup cooked or 1 ounce (28 grams) of dry hominy grits credits as 1 oz eq whole grain.
- Corn masa, masa harina, and nixtamalized corn flour/commal is determined by weight as listed in Exhibit A or by grams of creditable grain per portion.

### Table 3 - Grain crediting

<table>
<thead>
<tr>
<th>Grain Type</th>
<th>K-8</th>
<th>9-12</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bison, Venison, Turkey*</td>
<td>K-8 Serve 1.0 oz cooked (by weight) to credit 1.0 oz eq M/MA</td>
<td>9-12 Serve 2.0 oz cooked (by weight) to credit 2.0 oz eq M/MA</td>
</tr>
<tr>
<td>Nuts** / Seeds can only meet up to half of the daily M/MA component</td>
<td>K-8 Serve ¼ cup to credit 1.0 oz eq M/MA</td>
<td>9-12 Serve ¼ cup to credit 2.0 oz eq M/MA</td>
</tr>
<tr>
<td>Fish*</td>
<td>K-8 Serve 1.0 oz cooked (by weight) to credit 1.0 oz eq M/MA</td>
<td>9-12 Serve 2.0 oz cooked (by weight) to credit 2.0 oz eq M/MA</td>
</tr>
<tr>
<td>Eggs*</td>
<td>K-8 Serve ½ large to credit 1.0 oz eq M/MA</td>
<td>9-12 Serve 1 large to credit 2.0 oz eq M/MA</td>
</tr>
<tr>
<td>Beans / Peas (Legumes) must be counted as a M/MA or vegetable, not both</td>
<td>K-8 Serve ½ cup prepared to credit 1.0 oz eq M/MA</td>
<td>9-12 Serve 1 cup prepared to credit 2.0 oz eq M/MA</td>
</tr>
</tbody>
</table>

Table 2 - Meat/Meat Alternate Crediting

* To view information such as the raw-to-cooked yield amounts of each food, use the USDA FBG.
** Acorns do not credit in USDA School Meals Programs due to their low protein content.

### Fruit

The allowable types of fruit are fresh, frozen, canned, dried, and 100 percent pasteurized, full-strength fruit juice. Dried fruit credits as double the volume served (e.g., one-quarter cup of dried cranberries credits as one-half cup of fruit). The following shows traditional fruits, which credit by volume served. Many of the fruits listed below have been wild-harvested by American Indian nations. Most varieties eaten today are farmed, which are different than the varieties tribal communities ate in the past:

- Gooseberries
- Blueberries
- Serviceberries
- Blackberries
- Chokecherries
- Cranberries
- Huckleberries
- Raspberries
- Strawberries
- Buffaloberries
- Currants
Vegetables

The allowable types of vegetables are fresh, frozen, canned, and 100 percent pasteurized, full-strength vegetable juice. There are five vegetable subgroups that must be offered weekly at lunch: dark green, red/orange, beans/peas (legumes), starchy, and other vegetables. Uncooked, leafy green vegetables credit as half the volume served (e.g., one cup of romaine lettuce credits as one-half cup dark green vegetable). Table 4 shows examples of Indigenous vegetables in their respective subgroups.

Milk

Although not a traditional food, milk is one of the required components at both breakfast and lunch and must be offered daily in a variety.

Foods that do not count towards meal crediting

Not all traditional foods meet the nutrition standards and contribute towards a reimbursable meal. Indigenous 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.

Menu Planning

After reviewing the five food components of the USDA School Meals Programs and the breakfast and lunch meal patterns, use the following information to create flavorful, fresh, standardized recipes and menus that incorporate traditional ingredients. These recipes and menus can be used to build reimbursable meals that students will enjoy. What menu items do you currently offer? Traditional foods may already be on your menu! Promote those items that feature traditional foods like corn, beans, squash, local berries, trout, and buffalo. Are there any menu items you could incorporate that are traditional? Maybe there are menu items that could be substituted for a traditional food option. Substitute brown rice on the menu with wild rice, or add ground bison to a mixed dish in place of ground beef.

Standardizing Recipes

A standardized recipe is required for anything that is prepared with more than one ingredient. A standardized recipe is one that is made specifically for your food service operation. A quantity recipe is any recipe that makes twenty-five or more portions, and may be used as a basis for a recipe standardized to your operation. A quantity recipe becomes a standardized recipe when it has been tested, adapted, and evaluated so that it is specific to your kitchen.

Steps to create a standardized recipe:

• Choose a quantity recipe using traditional ingredients. Depending on the number of portions the recipe makes, you may have to increase or decrease the ingredients to serve the appropriate number of students eating the school meal.
• Prepare the recipe and make adjustments until a suitable dish is made that students enjoy. This may not happen on the first try and adjustments may need to be made.
• Determine the portion size of the recipe, or how much each student will be served. If serving multiple grade groups, determine if there will be more than one portion size. Remember, altering the ingredients or their quantities may alter the dietary specifications, crediting, and quality of the product.
• Determine how this portion size credits toward the meal pattern. Check out the menu planning tools below to help with the crediting and dietary specifications of your recipe.

Montana’s OPI website offers some standardized recipes like the Montana Healthy School Recipe Roundup.

Menu Planning

After standardized recipes have been created, you must create a menu that meets meal pattern requirements. When planning your menu, ensure the dietary specifications are within limits for the appropriate grade group and that proper portion control is being practiced. After creating a quality menu, consider adding a la carte items that meet USDA Smart Snacks requirements using traditional ingredients. These a la carte items may help increase participation.

The intent of the USDA School Meals Programs is to provide nutrient-rich meals that support the healthy development of children. By using healthy cooking techniques, such as baking, broiling, grilling, or roasting, and traditional foods, you can create menus that support the nutrition guidelines. When creating a menu, menu planners must consider the dietary specifications. These include the calories, saturated fats, sodium, and trans fats of each menu item. The dietary specifications are assessed as a daily average over the course of one week; this means the amount of calories offered on some days can be higher or lower than the allowable range, as long as the average over the course of the week falls within the specifications.
Cycle Menus
Planning menu options that taste good, are healthy, and meet meal pattern requirements can be challenging. Cycle menus make it easier for menu planners by establishing a rotating 3-, 4-, or even 5-week menu cycle. They can also help menu planners save time with meal planning and placing food orders. An example of a cycle menu can be found on the OPI website. A 2-week cycle breakfast menu is also available.

Smart Snacks
Although not part of a reimbursable meal, incorporating Smart Snacks into the cafeteria may help with participation. Smart Snacks in schools refer to all food and beverages sold to students on the school campus during the school day, outside of reimbursable meals. A la carte items made with traditional ingredients may be sold to students as long as they meet the Smart Snacks requirements. The Iowa Department of Education’s Smart Snacks in School webpage has Smart Snacks recipes, some of which incorporate traditional ingredients. These include Maple Muffins, Smart Cranberry Cookie, Mexican Sweet Potato Bowl, and Pumpkin Smoothie in a Cup.

Making Reimbursable Meals
Menu planners can prepare traditional foods offered as part of a reimbursable meal that meet meal pattern requirements. Under Offer versus Serve (OVS), students are allowed to decline some of the food offered, while still making a reimbursable meal. This reduces food waste as students choose the foods they are more likely to eat and decline the foods they are less likely to eat. At breakfast, a student must select at least three food items, one of which is one-half cup fruit or vegetable, or a combination. A food item at breakfast is defined as 1.0 oz eq grain, one-half cup of fruit and/or vegetable, or one cup of milk. At lunch, a student must select at least three full, different food components, one of which is one-half cup of fruit or vegetable, or a combination.

Menu Planning Tools
The following USDA menu planning tools can help develop menus for students that use traditional foods and that are delicious, healthy, and meet meal pattern requirements.

Food Buying Guide for Child Nutrition Programs
Interactive Web-Based Tool
This interactive tool contains yield and crediting information for foods with a standard of identity. This works for unprocessed foods as items like cranberries, buffalo, pumpkin, and wild rice can be found in the FBG.

Certification of Compliance Worksheets: 5-Day Schedule
This tool determines if the meal pattern requirements are met for the day and week. It also determines if the whole grain-rich requirement, juice limits, and vegetable subgroups have been met.
Procuring Traditional and Local Foods

Schools can procure a variety of traditional and local foods using proper procurement methods.

Procurement Regulations

Procurement is the sourcing and purchasing of goods or services, often through a competitive bidding process. This toolkit cannot possibly cover all the laws and rules governing purchasing and school meal requirements. For those, you can refer to the Montana Office of Public Instruction (OPI) and USDA’s Food and Nutrition Service (FNS) websites.

As per OPI’s website, SFAs must follow procurement procedures for all purchases for goods or services that are supported in whole or in part with non-profit food service account funds. Following proper procurement procedures helps ensure that procurements are fair, open, and competitive.

The OPI School Nutrition Program conducts procurement monitoring and training to assist districts with compliance of the rules. All procurement in the Child Nutrition Programs must comply with:

- 2 CFR 200;
- USDA Program regulations (7 CFR Part 210, Part 215, Part 220, Part 225, Part 226, Part 245, and Part 250 as applicable);
- State law, regulations, and policies that are not in conflict with Federal requirements; and
- Local law, regulations, and policies that are not in conflict with Federal requirements.

There are links on the OPI website to procurement FAQs, requirements, methods, as well as resources and policies.

Among the various procurement methods, micro-purchase will often be the method used when sourcing indigenous and local foods. Micro-purchase means a purchase of products or services where the total does not exceed $10,000 per transaction.

To the extent practicable, purchases must be distributed equitably among qualified suppliers with reasonable prices. You can identify if a price is reasonable by comparing prices from previous purchases, if you have personal knowledge of the item being purchased, or by comparing prices to similar items being purchased.

Montana requires the following records for micro-purchases:

- Receipts documenting when the total amount purchased falls below $10,000;
- Documentation showing how purchases are being distributed equitably among qualified suppliers; and
- Documentation stating why there is only one qualified supplier, if that is the case. This should include the reasons, such as labor and mileage cost for driving to another location.

Another important resource for incorporating local and Indigenous foods into your program is FNS’s Office of Community Food Systems (OCFS).

This agency helps child nutrition program operators incorporate local foods in the National School Lunch Program and its associated programs, as well as the Summer Food Service Program and Child and Adult Care Food Program. In addition, OCFS staff works with tribal communities to respond to their desire to better incorporate traditional foods into our meal programs. OCFS accomplishes this through their Farm to School Grant Program, training and technical assistance and research.

For example, two 2021 Farm to School grant awardees in Montana included:

- The Boys & Girls Club of the Flathead Reservation and Lake County for their implementation of edible gardens at the Polson and Ronan Clubhouses; and
- Farm Hands–Nourish the Flathead for their implementation of the Wildcat Farm to School Program done in partnership with Columbia Falls School District – featuring agricultural education, an edible school garden classroom, and local procurement for Fresh Snack Fridays.

Other Montana organizations that can assist you with incorporating local and traditional foods into your meal programs are Montana Farm to School and Abundant Montana.
Defining “Local”

There is no single definition for the word “local.” Your school can define “local” however it wants. Whether local is within 50 miles of your school, within the state of Montana, or within the surrounding states, “local” can differ from district to district. Determine what grows locally in your area. The Montana Farm to School Program has a chart on Montana Seasonal Foods that helps determine which traditional foods to purchase throughout the year. By identifying the values, needs, and wants of your school district and community, you can better define what local means in order to build a comprehensive program that supports children and the community.

Montana’s Geographic Preference

Montana law allows public institutions the option to prioritize “local” over “lowest bid” by taking advantage of an optional exemption from the Montana Procurement Act in the purchasing of Montana-produced food. This optional exemption, enacted in 2007, gives public institutions more flexibility to buy Montana-produced food, unless the purchases are made using federal dollars. The law requires that food purchases stay within their current budgets. This means an institution may pay more for Montana-produced food items as long as the extra cost can be made up on other less expensive items or substitutions. “Montana-produced” is defined broadly in the law to mean products that were “planted, cultivated, grown, harvested, raised, collected, or manufactured” in Montana.

Local Meat

Animals slaughtered and processed in a “custom exempt” plant may not be sold; that meat is for consumption by the owner(s) of the animal, which cannot include schools. However, retail meat establishments can further process state- or federally-inspected product for sale to schools. Less than 25% of their sales can be to hotels, restaurants, and institutions limited to $76,500 of sales, or retails produce grown by the produce dealer in this state when gross annual retail sales exceed $25,000. For more information visit the Montana Department of Agriculture’s Produce site.

Produce (Fruit and Vegetables)

Generally, no licenses, formal inspections or regulatory oversight are required of any food in its raw, unaltered state, including fruits, vegetables, raw honey, and grains for very small producers. Raw and unprocessed fruits and vegetables cannot be: • Cooked • Canned • Preserved, except for drying • Combined with other food products • Peeled, diced, cut, or blanched

A Produce Dealer License is required for any person who wholesales produce in the state, transports produce from out of state into this state for retail sales, or retails produced grown by a produce dealer in this state when gross annual retail sales exceed $25,000. For more information visit the Montana Department of Agriculture’s Produce site.

Grains and Pulse Crops

Grains and pulse crops (legumes that include chickpeas, lentils, dry beans, and dry peas) that have not been processed are raw agricultural commodities and do not require licensing or inspections. Processed products containing grains and pulse crops are considered a processed food. See above “Processed produce and other food items” for requirements. Like produce, raw grains and pulse crops may not be: • Cooked • Canned • Preserved, except for drying • Combined with other food products • Peeled, diced, cut, or blanched

Produce product and other food items

Processed items (including minimally processed such as sliced, chopped or peeled) must follow food safety and licensure requirements established by the Montana Department of Public Health and Human Services and the local Board of Health. Sanitarians do not establish requirements, they only enforce them. The basic question to ask if you are purchasing any processed products is, “Are you a licensed food manufacturer through Montana Department of Public Health and Human Services?”

The Local Produce Procurement Checklist serves to guide your procurement conversations with local farmers and food producers and provides a formal mechanism for tracking local produce purchases. It is recommended, but not required, that you complete this checklist for each farmer from whom you purchase produce and keep a copy of this checklist within your records as part of your food safety plan documentation.

Some farmers may be GAP Certified, GAP stands for Good Agricultural Practices and is a certification program that many farms that sell to larger food distributors participate in. GAP is not required by law for farms to sell their products to schools. However, if a farm you are purchasing product from is GAP Certified, you probably do not need to fill out your own food safety checklist. Many small farmers may not be GAP Certified—audits are expensive and there is no federal or state GAP mandate for small farms—but they may have an on-farm food safety plan. Ask your farmer vendors if they have implemented a GAP or on-farm food safety plan, and if so for a copy. If they don’t have a written plan, you may request they develop one, but give them several weeks to complete it. Montana Food and Agriculture Development Centers provide training on food safety and GAPs.

A Commodity Dealers License is required if a person engages in a business involving or, as part of the business, participates in buying, exchanging, negotiating, or soliciting the sale, resale, exchange, bailment, or transfer of any agricultural commodity in the state of Montana valuing $30,000 annually. While this probably does not apply to most farm to school transactions, you can learn more about this on the Montana Department of Agriculture website.
Native Agricultural Producers and Processors

When CNP operators purchase traditional foods from Native producers, everyone wins. Kids have an opportunity to eat nutritious, local, traditional foods, while producers get an economic boost, and tribal communities enjoy more food sovereignty.

The number of Native producers and food processors is growing constantly. This toolkit will be updated as new suppliers reach the capacity to provide bulk products for school lunch programs. Several organizations are working on expanding and sustaining farm to school in Native communities across the country and assisting Native agriculture and food producers to become better able to produce at a commercial scale in order to have enough volume to supply schools and other institutions with bulk products. These groups include the First Nations Development Institute (FNDI) through their Native Farm to School project, and the Intertribal Agriculture Council, through their American Indian Foods program.

Intertribal Buffalo Council
For nearly 30 years, the Intertribal Buffalo Council (ITBC) has worked to restore buffalo to Tribal lands in an environmentally sustainable and culturally appropriate way. Their membership has grown to 69 Native Nations who have restored more than 20,000 buffalo to their lands. Many of ITBC’s member Tribes offer buffalo meat and products for sale. The list of resources for buffalo meat continues to grow, so check back often for updates.

Blackfeet Nation Buffalo Program
The Blackfeet Nation, in conjunction with their business operation, Siyeh Corporation, manage a bison herd of over 800 animals. Their work includes bison restoration, wildlife habitat conservation, food sovereignty, ecotourism, cultural revitalization, and more. Contact the programs at 406-338-7521. Animals from the Blackfeet herd are currently being processed at Superior Meats in Superior, Montana while the tribe explores options for their own processing facility.

Native Fish Keepers
Owned and operated by the Confederated Salish and Kootenai Tribes, Native Fish Keepers Inc offers the highest quality lake trout and whitefish filets. The fish are harvested from the cold, clear waters of Flathead Lake as a means to protect native cutthroat and bull trout from predation. Purchase of their products support ongoing native trout conservation.

Red Lake Nation Foods
Located on the Red Lake Indian Reservation in northern Minnesota, Red Lake Nation Foods produces unique specialty products which represent their cultural heritage for the benefit of over 10,000 members of the Red Lake Nation. These products include wild rice and wild rice blends, maple syrup, and jams and syrups made with wild harvested berries.

Lakota Foods
Nestled on the fertile banks of the Missouri River in Lower Brule Country, Lakota Foods grows and processes non-GMO popcorn. The Lakota people invite you to experience a richly unique taste and flavor of popcorn. This delicacy is descended from the very corn grown and popped around Tribal campfires for generations.

According to the US Census of Agriculture, there are more than 46,000 American Indian or Alaska Native farms and more than 2,000 Native Hawaiian and Pacific Islander farms in operation in the United States.

Ramona Farms
Ramona’s American Indian Foods, LLC is an Akimel O’Odham-owned business in Sacaton, Arizona. They specialize in cultivating drought-resistant tepary beans and heritage corn products.

Additional Resources
- Farm-to-Cafeteria Initiatives: Connections with the Tribal Food Sovereignty Movement
- Nourish Native Foods & Health Program Brochure
- Native Food Systems Resource Center: Farm to School
- Centers for Disease Control and Prevention Traditional Foods Project
- Farm to School: Our Work in Native Communities
Hardin Public Schools
Located in Hardin Montana and the Crow Nation, the Hardin Public Schools nutrition team serves free breakfast and lunch to any student, regardless of income. The meals are funded through the USDA’s Community Eligibility Provision (CEP).
In 2018, Crow Agency Public School students K-5 planted chokecherries, service berries, plums, currants, and elderberries as part of a grant through National Farm to School Network’s Seed Change in Native Communities. Their goal was to empower students in learning about traditional foods, preparation, storage, and ceremony. These plants will serve as a gathering place for classes, a community resource, and most importantly, a native food source for students K-5 to harvest, cook, and learn.

The 2021-2022 Vocational Agriculture students built a greenhouse at the Hardin Senior High School. While the greenhouse will receive some upgrades during the following school year, it is currently home to tomatoes, strawberries, and cucumbers. A 72 foot-long high tunnel will be constructed in the fall of 2022 and help students experience more of their class-grown foods in the school year.

The variety of traditional berries and plums helps bring students together with elders and community leaders who can pass down and celebrate Crow traditions surrounding these foods. While waiting anxiously on the plants to establish and begin producing, students will continue hands-on cooking, gardening and nutrition lessons in their class. The Hardin School District spends between $10,000 to $20,000 a year on local foods and hope to keep expanding their farm-to-school program.