



Frequently Asked Questions (FAQs) About Serving Bison and Beef in USDA Child Nutrition Programs in South Dakota



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Frequently Asked Questions (FAQs) About Serving Bison and Beef in USDA Child Nutrition Programs in South Dakota



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This FAQ document provides responses to commonly asked questions about serving beef and bison in South Dakota Child Nutrition Program (CNP) meals and snacks. The responses apply regardless of whether the beef or bison is donated to or purchased by the school or CNP operator, and whether the meat is locally raised, locally processed or not. The following refer to federal and state requirements; meat processors or schools can go “above-and-beyond” the requirements described. Local, individual school or tribal requirements or preferences may be more restrictive or thorough. The document refers to bison and buffalo using these two names interchangeably, since the same animal is referred to both ways in different reference documents. ¹

Need more information or have questions? Contact information may be found at the end of this document.

Slaughter and Processing Inspection Requirements

1. What are the slaughter and processing requirements for beef and bison served in Child Nutrition Programs in South Dakota?

In order to be served in USDA CNP meals or snacks, USDA Food and Nutrition Service requires that beef and bison be slaughtered and processed under USDA Food Safety and Inspection Service (FSIS) inspection or State of South Dakota inspection. ²

Beef, not bison, may be slaughtered and processed under state inspection at Cooperative Interstate Shipment (CIS) Select Establishments in any of the eight states participating in the CIS program and be served in CNP meals or snacks. (The CIS program does not apply to bison).³

The requirements above are in place whether the meat is purchased or donated to the school.⁴ (For details about an inspection exemption for donated

¹ Exotic species are defined in 9 CFR 352.1: (e) Bison means any American bison or catalo or cattalo. (f) Buffalo means any animal belonging to the buffalo family. (g) Catalo or Cattalo means any hybrid animal with American bison appearance resulting from direct crossbreeding of American bison and cattle. (<https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-352/subpart-A/section-352.1>).

² South Dakota participates in the State Meat and Poultry Inspection (MPI) program under a cooperative agreement with USDA FSIS. Under the agreement, South Dakota's program enforces requirements “at least equal to” those imposed under the Federal Meat Inspection Act and the Poultry Products Inspection Act. Product produced under State inspection is limited to intrastate commerce.

³ South Dakota entered the CIS program in 2021. The other eight participating States are Indiana, Iowa, Maine, Missouri, North Dakota, Ohio, Vermont, and Wisconsin. Learn more about the CIS program here: <https://www.fsis.usda.gov/inspection/apply-grant-inspection/state-inspection-programs/cooperative-interstate-shipment-program>.

⁴ The requirement that all beef and bison served in school meals be slaughtered and processed under State or Federal inspection includes all requirements required to receive the State or Federal inspection stamp. The Act, regulations and facility resources are at: <https://www.fsis.usda.gov/policy>. FSIS does not require all products to be tested for E. coli /O157/ STEC. Establishments are required to show that their products are safe, and testing is common, but not required at the Federal level.

traditional meat served to primarily Native American or Alaska Native students, see question #2 below.)

At the federal level, bison is not amenable, meaning bison is not a species that requires inspection under the Federal Meat Inspection Act and associated regulations. Any species not required to be inspected by FSIS falls under Food and Drug Administration (and state and local) jurisdiction. Under the Agricultural Marketing Act, FSIS can provide voluntary inspection of certain animals, including bison, when requested by the processor. FSIS charges an hourly rate for this voluntary service.⁵

At the state level, bison is considered an amenable species. This means that the State of South Dakota will provide a state inspector to inspect the slaughter and processing of bison at no charge, if FSIS inspection is not required.

Beef is an amenable species, so inspection of beef is required, by either FSIS or the State of South Dakota. There is no charge to the processor for this mandatory service (except during overtime, weekends or holidays).

Sources: *SP 01-2016, CACFP 01-2016, SFSP 01-2016 Procuring Local Meat, Poultry, Game, and Eggs for Child Nutrition Programs*: <https://fns.usda.gov/cn/procuring-local-meat-poultry-game-and-eggs-child-nutrition-programs>

Selling and Distributing Red Meat in South Dakota (2021): <https://aib.sd.gov/pdfs/To%20sell%20and%20distribute%20red%20meat%20in%20South%20Dakota.pdf>

2. What is the inspection exemption for traditional food donated to Child Nutrition Programs that primarily serve Native American or Alaska Native students?

Traditional food, such as bison, that is donated to CNP operators that primarily serve Native American or Alaska Native students and is served in CNP meals or snacks does not need to be slaughtered or processed under USDA FSIS or State of South Dakota inspection. The school takes on certain food safety and other responsibilities when accepting a donation of traditional food, which are listed on





page two of the memo below.

Source: *SP42 CACFP19 SFSP21-2015 Service of Traditional Foods in Public Facilities* <https://fns.usda.gov/cn/service-traditional-foods-public-facilities>

Labeling Beef and Bison for Child Nutrition Programs

3. What are the labeling requirements for beef or bison offered in CNPs?

Considering both federal (USDA FSIS) and state (South Dakota Animal Industry Board) requirements, the following elements are minimum labeling requirements for beef or bison offered in CNPs:

Label Element	Requirement
Inspected Stamp/ Legend	<p>Any one of the following inspection stamps are allowable on the Principal Display Panel (PDP).</p>  <p>South Dakota inspected stamp</p>  <p>USDA inspected stamp on exotic species (e.g., bison)</p>  <p>USDA inspected stamp on raw beef</p>  <p>USDA inspected stamp on processed beef</p> <p>#38 is used in USDA stamps as sample establishment number</p>
Common Product Name	Required on the PDP
Ingredient Statement	Required if product contains more than one ingredient; may be on the PDP or the information panel
Handling Statement	Required on the PDP
Signature Line – Processor Name and Address	Required; may be on the PDP or the Information panel
Safe Handling Instructions	Required for raw or partially cooked meat; may appear anywhere on the package.

Net weight statements are not required for beef products sold for food service use only, but a net weight statement may be added voluntarily when in compliance with 9CFR 317.2(h) or 21CFR 101.7 for non-retail packages of bison.

⁵ USDA FSIS offers voluntary field inspection of exotic species, including bison. The only part of the inspection process that may be performed in the field is ante-mortem inspection; the postmortem inspection must be performed in a processing establishment. This process may require some coordination on the part of the school, processor and USDA FSIS as it is a service that must be applied for and then granted by FSIS District Office 25 (<https://www.fsis.usda.gov/contactus/fsis-offices/office-field-operations-fo>), which covers South Dakota. FSIS Directive 12,600.1 describes the application for voluntary inspection on pages 5 and 6 (https://www.fsis.usda.gov/sites/default/files/media_file/2020-08/12600.1Amendment%202.pdf). This voluntary service must be paid for by the recipient of inspection, and 9 CFR 352 Subpart A describes the requirements for the establishment/facility requesting the voluntary inspection (<https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-352/subpart-A>).

Sources: *Selling and Distributing Red Meat in South Dakota (2021)* <https://aib.sd.gov/pdfs/To%20sell%20and%20distribute%20red%20meat%20in%20South%20Dakota.pdf>

FSIS Labeling Requirements Guide (2007) https://www.fsis.usda.gov/sites/default/files/media_file/2021-02/Labeling_Requirements_Guide.pdf

FSIS Food Standards and Labeling Policy Book (2005) <https://www.fsis.usda.gov/guidelines/2005-0003>

FSIS Regulations: 9 CFR 312.2(a)&(b) - Official marks and devices to identify inspected and passed products of cattle, sheep, swine, or goats. [https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-312/section-312.2#p-312.2\(a\)](https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-312/section-312.2#p-312.2(a))

9 CFR 317.2 - Labels: definition; required features. <https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-317/subpart-A/section-317.2>

9 CFR 352.7 Marking Inspected Products. <https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-352/subpart-A/section-352.7>

4. Must beef and bison be labeled with nutrition information to be offered in a CNP?

Typically, meat is required to have a Nutrition Facts label, per USDA’s Food Safety Inspection Service regulations (9 CFR 317.300). However, products not sold to retail consumers (i.e. for food service use only) are exempt from bearing Nutrition Facts labels as long as they do not include any nutrient content claims or other nutrition information. If nutrition claims are present, then a Nutrition Facts label is required.⁶ Additionally, most South Dakota-inspected meat establishments are small and very small establishments operating under exemptions to 317.300 as described in 317.400 (a)(1)(i) and (ii), and therefore are not required to include Nutrition Facts labels.

Sources: *FSIS Regulations: 9 CFR 317.300 - Nutrition labeling of meat or meat food products.* <https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-317/subpart-B/section-317.300>

9 CFR 317.400 - Exemption from nutrition labeling. <https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-317/subpart-B/section-317.400>

5. Are beef and bison offered in Child Nutrition Programs required to have Child Nutrition Labels?

No, Child Nutrition (CN) Labels are not required for beef, bison or any other food served in CNPs. The CN Labeling Program provides food manufacturers the option to include standardized food crediting

statements on their product labels. CN Labels may be available for main dish food products that contribute at least 0.5-ounce equivalents to the meat/meat alternate component of the meal pattern requirements. CN Labels make it easy for school menu planners to determine how foods credit toward meal pattern requirements; they can be especially helpful for mixed dishes that contribute toward multiple components.

Source: *CN Labeling Program* <https://fns.usda.gov/cn/labeling-program>

Crediting Beef and Bison Towards Child Nutrition Program Meal Pattern Requirements

6. What is the process to determine how a food, such as beef or bison, contributes toward Child Nutrition Program meal pattern requirements?

To determine how a food product contributes to meal pattern requirements, menu planners can use information from one of three places: a CN Label, a Product Formulation Statement, and/or the USDA’s Food Buying Guide for Child Nutrition Programs (Food Buying Guide) (<https://foodbuyingguide.fns.usda.gov>). The Food Buying Guide helps menu planners purchase the right amount of food and determine the specific contribution each food makes toward CNP meal pattern requirements. The Food Buying Guide contains crediting information for ground buffalo and several types of beef. For example, per the Food Buying Guide:

1 pound (16 ounces) raw, ground buffalo = 0.72 lb. (11.52 oz.) cooked, drained ground buffalo

Starting Amount	Serving Size	Number of Servings
11.52 oz. cooked, drained ground buffalo (from 1 lb. raw)	1 oz.	11.5
	1.5 oz.	7.6
	2 oz.	5.7

The Food Buying Guide contains one entry for buffalo: Game, Buffalo (ground). Schools that opt to offer cuts of buffalo (other than ground) may use Food Buying Guide information for comparable cuts of beef to determine crediting.

Schools are required to offer at least one or two ounces of meat (or meat alternate) per day in the

⁶ For additional information regarding voluntary nutrition claims on package labels, for beef see 9CFR 317.400 for bison see 21 CFR 101.9(j).

National School Lunch Program (NSLP) depending on the grade(s) of students being served. Minimum requirements vary by student grades. Schools are not required to offer meats/meat alternates in the School Breakfast Program (SBP) but may choose to offer meat at local menu planners' discretion.

Student Grade(s)	Minimum Daily Meat that Must be Offered (NSLP)	Minimum Weekly Meat that Must be Offered (NSLP)
Preschool (ages 3-5)	1.5 oz.	7.5 oz.
K-5	1 oz.	8-10 oz.
6-8	1 oz.	9-10 oz.
9-12	2 oz.	10-12 oz.

Sources: *FNS Regulations: 7 CFR 210.10 - Meal requirements for lunches and requirements for afterschool snacks.* <https://ecfr.federalregister.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210/subpart-C/section-210.10>

USDA's Food Buying Guide for Child Nutrition Programs <https://foodbuyingguide.fns.usda.gov>

7. What is the fat content requirement for ground beef in Child Nutrition Program meals?

To credit in CNPs, a creditable meat ingredient must match or have a similar description to the food item in the Food Buying Guide. All Food Buying Guide entries for ground beef have 30% or less fat, so all ground beef served in CNPs must have 30% or less fat.⁷ Ground beef that has less than the 30% regulatory maximum may be labeled in the ingredients statement with the maximum amount of fat that the manufacturer blended it to be, e.g., "ground beef (not more than 20% fat)." If the fat content is not included in the ground beef ingredient declaration, then it assumed to be no more than the 30% fat regulatory maximum. Then, this description may be matched to the applicable Food Buying Guide entry.

Sources: *FSIS Regulations: 9 CFR 319.15 - Miscellaneous beef products.* <https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-319/subpart-B/section-319.15>

USDA's Food Buying Guide for Child Nutrition Programs, Meat Section: <https://foodbuyingguide.fns.usda.gov/FoodComponents/ResourceMeat>

8. What is the fat content requirement for ground buffalo in CNP meals?

Per the Food Buying Guide, there is no fat content requirement for ground buffalo offered in the CNPs. Buffalo is typically lower in fat than beef. Menu planners may use information in the Food Buying Guide to determine how ground buffalo credits toward meal pattern requirements.

Source: USDA's Food Buying Guide for Child Nutrition Programs <https://foodbuyingguide.fns.usda.gov>

9. How might schools work with processors to determine the fat content of a beef or buffalo product?

Child Nutrition Program meals must fall below the saturated fat dietary specifications for the school week. School lunches offered to all age/grade groups must, on average over the school week, provide less than 10% of total calories from saturated fat. Based on foods offered over a school week, CNP operators may have a sense of a menu's saturated fat content without knowing the exact saturated fat content of each individual product. A state agency is only required to conduct a nutrient analysis of a school's menu if there is a high risk that a menu may not meet the weekly dietary specifications for calories, saturated fat and sodium. In this case, the school would need to have documentation showing the saturated fat content of the beef or buffalo from the supplier.

The fat content of ground meat may be listed in the ingredients statement with the maximum amount of fat that the manufacturer blended it to be, e.g., "ground beef (not more than 20% fat)." If the fat content is not included in the ground beef ingredient declaration, then it is assumed to be no more than the 30% fat regulatory maximum.

USDA FSIS does not require analytical testing to determine nutrition information. If the fat content is listed on a product, analytical testing is one acceptable method for determining the precise fat content, but an establishment could choose to use the USDA database (FoodData Central: <https://fdc.nal.usda.gov>) or a different computer database or software program to obtain accurate nutrition information for the product. Federal and state

⁷ This standard aligns with USDA FSIS standards of identity for beef products. Per FSIS regulations at [9 CFR § 319.15](https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-319/subpart-B/section-319.15), ground beef, hamburger or beef patties may not contain more than 30% fat.

inspectors are required to perform random fat tests throughout the year. Some inspectors have access to testing equipment and may be willing to help processors develop product specifications to meet schools' needs. Commercial laboratories may also conduct nutrient analyses to determine fat content. South Dakota State University Extension may also be able to assist in this area.

If the establishment chooses to use analytical testing to determine the nutrition values, the test could be run once after processing and the establishment could use that same process that resulted in that fat content level without retesting.

Processors must maintain records to verify the nutrient levels claimed on a Nutrition Facts Panel in accordance with Food and Drug Administration Food Labeling requirements at 21 CFR 101.9(g)(10) for beef: "The manufacturer must make and keep written records (e.g., analyses of databases, recipes, formulations, information from recipes or formulations, or batch records) to verify the declared amount of that nutrient on the Nutrition Facts label..." and 9 CFR 320.1(b) for bison.

Sources: *FNS Regulations 7 CFR 210.10(f)(2) – Saturated fat.* [https://ecfr.federalregister.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210/subpart-C/section-210.10#p-210.10\(f\)\(2\)](https://ecfr.federalregister.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210/subpart-C/section-210.10#p-210.10(f)(2))

FSIS Regulations: 9 CFR 319.15 - Miscellaneous beef products. [https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-319/subpart-B/section-319.15#p-319.15\(a\)](https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-319/subpart-B/section-319.15#p-319.15(a))

9 CFR 320.1(b) – Records required to be kept. [https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-320/section-320.1#p-320.1\(b\)](https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-320/section-320.1#p-320.1(b))

Contacts

- SD Department of Education: Child and Adult Nutrition Services, School Nutrition Programs Assistant Director Mikayla Hardy; Mikayla.Hardy@state.sd.us; Phone: 605-773-2213; <https://doe.sd.gov/cans/>
- SD Animal Industry Board: Staff Veterinarian Dr. Tammy Anderson; Tammy.Anderson@state.sd.us; Phone: 605-773-3321; <https://aib.sd.gov/meatinspection.html>
- SDSU Extension: SDSU Extension Farm to School Nutrition Field Specialist Anna Barr; Anna.Barr@sdstate.edu; Phone: 605-995-7378; extension.sdstate.edu
- SDSU Extension: Professor and SDSU Extension Meat Science Specialist Amanda Blair; amanda.blair@sdstate.edu; Phone: 605-394-2236; <https://extension.sdstate.edu/meat-inspection-south-dakota-requirements-and-resources-processing-and-selling-meat> and <https://extension.sdstate.edu/tags/food-safety>
- USDA: Farm to School Regional Lead Andrea Alma; andrea.alma@usda.gov; Phone: 303-844-4417 <https://www.fns.usda.gov/cfs>
- USDA AskFSIS: A helpful service whereby USDA FSIS answers questions about meat, poultry and egg products inspection, FSIS policies and related topics. <https://www.fsis.usda.gov/contact-us/askfsis>



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