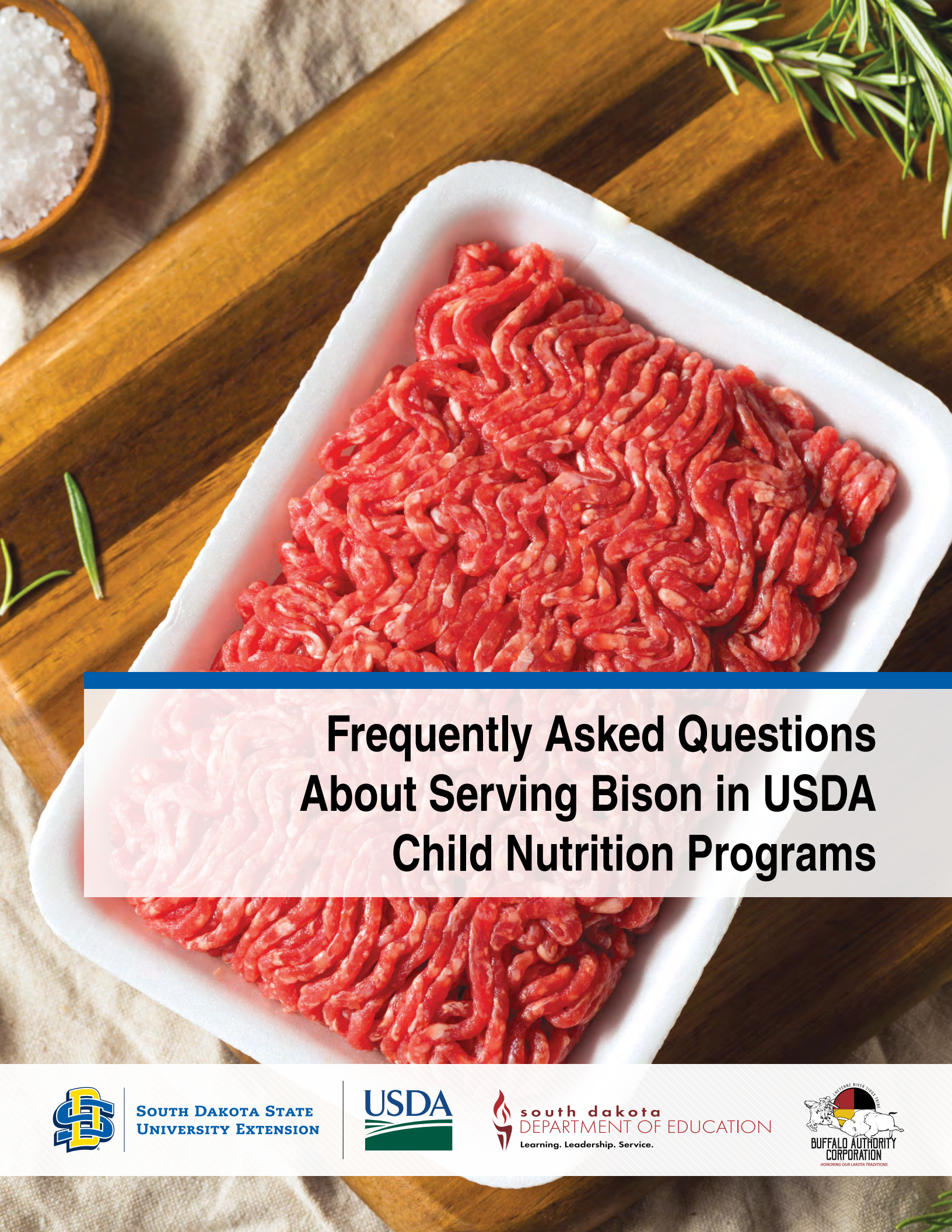




Frequently Asked Questions About Serving Bison in USDA Child Nutrition Programs



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Megan Blcok, SDSU Extension Nutrition Field Specialist

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Getting Started with Bison to School

This FAQ document provides responses to commonly asked questions about serving bison in South Dakota Child Nutrition Program (CNP) meals and snacks. The responses apply regardless of whether the 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

Food Safety and Product Labeling

Slaughter and Processing Inspection

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

Bison are native to North America; however, the USDA classifies them as an 'exotic' or non-amenable species, meaning bison is not a species that requires inspection under the Federal Meat Inspection Act and associated regulations. As a result, USDA Food Safety and Inspection (FSIS) inspections of bison are voluntary at the federal level. Voluntary inspections can be provided by

FSIS for wild game animals on a fee-for-service basis at USDA facilities upon request. In contrast, South Dakota considers bison to be an amenable species and provides state inspectors to oversee slaughter and processing operations at no cost to the processor.²

All red meat products sold or distributed in South Dakota need to come from a state or federally inspected source. South Dakota considers the following red meat products: beef, bison, yak, goat, lamb, pork, emu and ostrich, venison, and rabbit.³ Live animals are required to be slaughtered in an approved facility operating under state or federal inspection and the carcass must successfully pass both ante-mortem and post-mortem inspections. The carcasses and parts are processed under state or federal inspection in approved facilities.³ A list of those inspected establishments can be found at the South Dakota Animal Industry Board 2026 (<https://aib.sd.gov/List%20of%20inspected%20establishments.pdf>). Due to potential difficulty to transport livestock long distances to get to an FSIS-inspected slaughter facility, FSIS-inspected mobile slaughter units are an option. Therefore, game animals can undergo voluntary inspection at a mobile slaughter facility participating in a Meat and Poultry Inspection (MPI) program.⁴

An inspection legend or mark of inspection is required on all red meat products, state or federal. The red meat products that contain the federal mark of inspection are allowed to be sold and distributed within a state or across state lines. If the meat products only contain the state mark of inspection, they are only allowed to be sold and distributed in the state it was inspected or originated from.³



Source: South Dakota Animal Industry Board, Inspected Establishments Licensed by South Dakota Meat Inspection (Rev. May 2026). <https://aib.sd.gov/List%20of%20inspected%20establishments.pdf>

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

Traditional food donations are accepted under CNPs. The Food Buying Guide (FBG) footnote has been revised to clarify that both purchased wild and domesticated game animals may be served in CNPs when they comply with all applicable Federal, State, local and Tribal food safety and inspection requirements. The FBG also specifies that donated, uninspected wild game served by certain program operators that primarily serve Native American communities is creditable in CNP meals, as authorized under Section 4033 of the Farm Bill.² When a school accepts a donation of traditional food, it assumes specific food safety and related responsibilities associated with receiving and serving that food.⁵ Civil liability for states, counties

or county equivalents, local educational agencies, and entities or persons authorized to facilitate the donation, storage, preparation, or serving of traditional foods by the operator of a food service program are not liable in any civil action.⁶ State, Tribal, and local governments have the option to restrict or prohibit the donation of bison meat to public facilities without inspection.

3. Must bison be labeled with nutrition information to be offered in a CNP?

The USDA's Food and Safety Inspection Service requires meat to have a Nutrition Facts label (9 CFR 317.300), but rules differ depending on how the meat is processed. Products that are not sold directly to retail consumers, such as those intended solely for food service use, are generally exempt from Nutrition Facts labeling requirements, provided they do not display nutrient content claims or other nutrition-related information. However, if any nutrition claims are made on the product, a Nutrition Facts label must be included.⁶ The inspected meat processing establishments in South Dakota are classified as small and small businesses that operate under the exemptions outlined in 317.300 described in 317.400(a)(1)(i) and (ii) are not required to include Nutrition Facts labels on their products.

Source: 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>

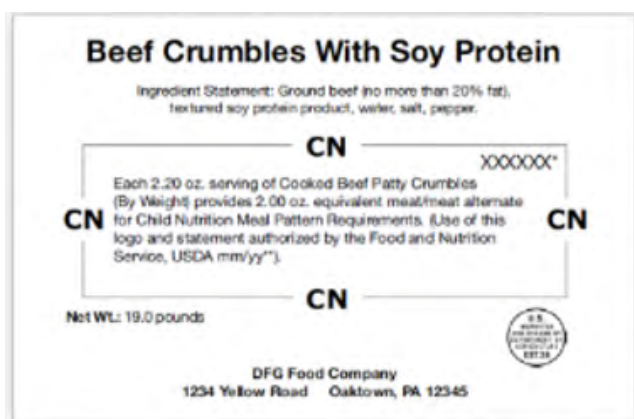
9 CFR 317.400 - Exemption from nutrition labeling. <https://ecfr.federalregister.gov/current/title-9/chapter-III/subchapter-A/part-317/subpart-B/section-317.400>

4. Are bison offered in Child Nutrition Programs required to have Child Nutrition Labels?

No, Child Nutrition (CN) labels are not required for any food served in the CNPs. The CN labeling program is a voluntary federal labeling program for CNPs. The CN labeling program requires an evaluation of products formulation to determine how it contributes towards CNP meal pattern requirements. This evaluation allows manufacturers to identify and display the products creditable contribution directly on the label. For CNP operators, a CN label serves as assurance that the product meets the specified meal pattern requirements and contributes exactly as indicated on the label. CN labels can be issued for main dish

products that provide at least 0.5-ounce equivalents of the meat/meat alternate component required under the CNP meal matter standards.

To identify a CN label, they will always contain the following: the CN border logo, the meal pattern contribution statement, a 6-digit product identification number, USDA authorization statement, the month and year of approval. Included is a link for additional CN label resources (Child Nutrition Labels) (<https://www.fns.usda.gov/tn/cnp/food-industry-toolkit/labels>).



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

Incorporating Bison into Child Nutrition Program Meals

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

Determining how a food product contributes to meal pattern requirements for CNPs, menu planners can use information from one of three places: CN label, a Product Formulation Statement (PFS), or the USDA Food Buying Guide for Child Nutrition Programs.

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

According to the FBG, ground bison is credited the same as ground meat items. Bison credits the same as ground beef, which is 26% fat. Compared to beef, buffalo is naturally lower in fat and therefore easily falls within these limits.

The FBG helps program operators, food manufacturers, and other stakeholders accurately purchase the quantities of food needed and

determine how those foods contribute toward reimbursable meal pattern requirements. The FBG is a helpful resource when looking for information on bison. There are two entries for bison within the FBG: Game, Buffalo (ground) and Bison Top Round Steak, fresh or frozen (without bone). Please refer to the example below:

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.	7.7

1 pound (16 ounces) raw, steak buffalo = 0.65 pounds.

(10.05 ounces), cooked trimmed, sliced buffalo

Starting Amount	Serving Size	Number of Servings
10.05 oz cooked sliced buffalo meat (from 1 lb. raw)	1 oz	10
	1.5 oz	6.7

The National School Lunch Program (NSLP) requires schools to offer at least one or two ounces of meat or meat alternate (M/MA) per day, depending on the grade of the students being served. For the School Breakfast Program (SBG), M/MA is not a separate meal component, but is part of the combined grains and M/MA meal component. This combined grains and M/MA meal component is only for breakfast. Schools may offer grains, M/MA, or a combination of both to meet this combined component requirement, based on ounce equivalents.

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

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

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/part210/subpart-C/section-210.10>

USDA FNS, TA 01-2024, Crediting Traditional Indigenous Foods in Child Nutrition Programs (2023): <https://www.usda.gov/sites/default/files/guidance-documents/fns.TA01-2024os.pdf>

U.S. Department of Agriculture, Food and Nutrition Service, Menu Planning (last visited Aug. 4, 2026). <https://www.fna.usda.gov/sbp/menu-planning>.

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

Child Nutrition Program meals are expected to meet saturated fat nutrition requirements throughout the school week. For all age and grade groups, school lunches need to average less than 10% of total weekly calories from saturated fat over the course of the school week. School menus are evaluated through nutrient analyses by state agencies during official administrative reviews using USDA guidelines. If a school's menu does not meet the weekly dietary specifications for calories, saturated fat, and sodium the state agency is required to conduct a nutrient analysis. If a nutrient analysis is required to be conducted, the school would need to have documentation showing the content of saturated fat of the bison from the supplier.

For specialty meats such as bison that may not carry a standard CN label, schools must obtain a signed USDA PFS from the processor. The Processor is responsible for calculating a documenting the products fat percentage on the form, as this information determines the cooked yield and affects how the meat contributes toward CNPs meal pattern requirements and school lunch crediting. If a PFS is required to be completed, there are USDA resources available for guidance (Product Formulation Statement Guidance and Templates for Food Manufacturers/Industry) (<https://www.fna.usda.gov/tn/cnp/food-industry-toolkit/pfs/guidance>).

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/section210.10#p-210.10\(f\)\(2\)](https://ecfr.federalregister.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210/subpart-C/section210.10#p-210.10(f)(2))

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

Institute of Child Nutrition, Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs (Pre-Publication Copy, Feb. 2014). <https://theicn.org/cnss/files/uploads/NAPManual.pdf>

Credits

The following individuals are recognized for their contributions and reviews of this document.

- Janelle Peterson, Child Nutrition Farm to School Program Specialist - South Dakota Department of Education
- Curtis Braun, SDSU Extension Field Specialist – Food Safety
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- John Eilertson, Meat Inspection Program Manager, South Dakota Animal Industry Board
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- Sarah Kinney, MBA, RDN, SNS, School Nutrition Programs Branch, Child Nutrition Division, Mountain Plains Regional Office – US Department of Agriculture

Footnotes

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. SP01 CACFP01 SFSP01-2016 Procuring Local Meat, Poultry, Seafood, Game, and Eggs for Child Nutrition Programs-REVISED: <https://www.fna.usda.gov/cn/procuring-local-meat-poultry-game-eggs>
3. South Dakota Animal Industry Board, AIB MI403, Selling and Distributing Red Meat in South Dakota (Rev. Apr. 2021). <https://aib.sd.gov/To%20sell%20and%20distribute%20red%20meat%20in%20South%20Dakota.pdf>
4. National CACFP Association, Procuring Local Meat, Poultry, Seafood, Game, and Eggs (Nov. 20, 2023). <https://www.cacfp.org/2023/11/20/procuring-local-meat-poultry-seafood-game-and-eggs/>
5. SP42 CACFP19 SFSP21-2015 Service of Traditional Foods in Public Facilities <https://fns.usda.gov/cn/service-traditional-foods-public-facilities>
6. SP 31-2019, CACFP 14-2019, SFSP 14-2019 Farm Bill Implementation Memo: Donated Traditional Foods and Civil Liability <https://www.fna.usda.gov/cn/farm-bill-implementation-memo-donated-traditional-foods-and-civil-liability>
7. For additional information regarding voluntary nutrition claims on package labels, for bison see 21 CFR 101.9(j)



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