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| <p style="font-size: 24pt; margin: 0;">ACF</p> <p style="margin: 10px 0 0 0;">Administration for Children and Families</p> | U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES | |
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TO: Tribal Child Care and Development Fund (CCDF) Lead Agencies; American Indian and Alaska Native (AIAN) Head Start award recipients; and Tribal Maternal, Infant, and Early Childhood Home Visiting (MIECHV) grant recipients.

SUBJECT: Supporting food security and access to Indigenous foods for children and families in Tribal early childhood programs

REFERENCES: The Child Care and Development Block Grant (CCDBG) Act (42 U.S.C. 9857 et seq.); The Head Start Act (42 U.S.C. 9801 et seq.) and the Head Start Program Performance Standards (42 U.S.C. 9801 et seq., subchapter B of 45 CFR chapter XIII); the Social Security Act (42 U.S.C. 619), 45 CFR Parts 98 and 99; Title V, Section 511 of the Social Security Act (42 U.S.C. 711); National School Lunch Act, Section 17 (42 U.S.C 1766), 7 CFR Part 226.

PURPOSE: This Information Memorandum (IM) details ways that Administration for Children and Families (ACF) early childhood funds may be used to connect young children and families with traditional Indigenous foods and food practices, including CCDF, AIAN Head Start, and Tribal MIECHV. ACF seeks to support Tribal Nations and communities in providing critical nutrition during children’s formative years, facilitating access to healthy and nutritious food in early childhood programs, and preserving culture through traditional Indigenous foods and revitalization of traditional agricultural practices. This guidance addresses uses of federal ACF early childhood funds; Tribes may need to consult applicable state, local, and Tribal policies regarding preparation of food served in early childhood settings.

INFORMATION: This IM provides information to Tribal Nations and communities regarding opportunities to use ACF early childhood funding to promote Indigenous food sovereignty and address food insecurity. It offers examples of activities that Tribal Nations and communities may implement based on the specific funding source and federal regulations. Indigenous food sovereignty and food security play an important role in supporting all aspects of a Native child’s development, including physical development, early learning, and a child’s engagement with their family and culture. ACF encourages Tribal early childhood programs, within the parameters of federal requirements, to consider the full range of strategies that can be used to promote Indigenous food sovereignty and food security for Native children and families.

BACKGROUND: ACF administers three early childhood funding streams in partnership with Tribes through the Office of Early Childhood Development (ECD), the Office of Child Care (OCC), and the Office

of Head Start (OHS): Tribal MIECHV, CCDF, and Head Start. Tribes use funding from these three programs to provide services to young children and their families during their most formative years. ACF engages in regular communication with Tribal leaders and program administrators who have expressed interest in better understanding how early childhood funding streams can support food sovereignty and food security for Tribes.

Indigenous Food Sovereignty and Food Security

The Bureau of Indian Affairs (BIA) describes Indigenous [food sovereignty](#) as the ability of Indigenous communities to determine the quantity and quality of the food that they consume by controlling how their food is produced and distributed, with a focus on traditional foods grown or produced by Tribes. Food sovereignty is the right of people to have access to healthy and culturally appropriate food produced by ecologically sound and sustainable methods, which includes the right to define their own food and agricultural systems. Food sovereignty is inextricably linked to community, identity, and tradition. Traditional foods are a critical part of physical, mental, emotional, and spiritual health for Native populations. Growing, preparing, and re-claiming traditional foods restores Tribal Nations and Native communities' connections to medicinal plants and land-based learning. The cultural knowledge needed to hunt, gather, and fish for traditional foods has been compromised in many Tribal communities due to harmful federal policies limiting Tribal Nations' relationship to land, water, and traditional food systems. In Native communities, Indigenous food sovereignty is not an individual concept but a collective and communal relationship. It is a family and community process that supports a historical and traditional relationship to food and well-being.

ACF acknowledges that harmful federal policies have disrupted the intergenerational transfer of knowledge about traditional foods and traditional methods for procuring and preparing food. The historical policies of the U.S. Government did not promote the nutrition and health of Tribal communities, nor did it honor Indigenous food traditions. This IM affirms that Tribes can use early childhood funds to support children's exposure and knowledge to traditional methods for growing and producing food and promote food security in their communities.

The Child and Adult Care Food Program (CACFP) and Indigenous Foods

CACFP is a federal program that provides reimbursements for nutritious meals and snacks to eligible children and adults who are enrolled for care at participating Head Start programs, child care centers, family child care homes, and adult day care centers. CACFP also provides reimbursements for meals served to children and youth participating in afterschool care programs, children residing in emergency shelters, and adults over the age of 60 or living with a disability and enrolled in day care facilities. The program is administered by the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS), Child Nutrition Programs (CNP). The CACFP program is administered via States and Tribes and receive funds from the State. While ACF does not administer CACFP, this IM provides additional information on CACFP policies, as many programs that receive Head Start and CCDF funding also receive CACFP funds.

Meal Patterns for Children

All meals and snacks served in CACFP programs must meet the requirements set forth in the [CACFP Meal Patterns for Children](#). The meal patterns are written in a way that allows program operators to plan menus that reflect the populations they serve and incorporate cultural and local foods. The amount

of food that must be offered varies based on the meal or snack, as well as the particular age group being served. The CACFP meal patterns include five meal components: fruits, vegetables, milk, meats/meat alternates, and grains. How individual foods contribute to the meal pattern requirements is referred to as “crediting”. USDA provides numerous resources to assist Program operators in determining how foods credit toward the meal pattern requirements, including the [Food Buying Guide for Child Nutrition Programs](#) (FBG).

Food Buying Guide

The CNP’s FBG is an essential tool that provides food yield information for: 1) planning and calculating the required quantities of food to purchase for CNP (including CACFP), and 2) determining the specific contribution each food makes toward the meal pattern requirements. The FBG enables program operators participating in CNP 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. The FBG includes different foods commonly used in CNP and is continually being updated with additional foods and new features. Program operators are encouraged to speak with the State agency that administers the CACFP to determine if a food that is not in the FBG is eligible for reimbursement.

Crediting Indigenous Foods

While the FBG provides a relatively comprehensive list of foods commonly served in CNP, it does not include yield information for every possible food served in reimbursable meals. Crediting of traditional or Indigenous foods that contribute to the meal pattern requirements but are not listed in the FBG may be determined using either of these methods: 1) using yield information of a similar food; or 2) conducting an in-house yield study. In these occurrences, traditional Indigenous food may credit like similar products found in the FBG, [as demonstrated in the table found in TA 01-2024 – Crediting Traditional Indigenous Foods in CNP](#). When traditional Indigenous foods that contribute toward the meal pattern requirements are not listed and are not similar to another food in the FBG, in-house yields may be developed and used. Instructions for developing in-house yields are available online in the “About the Food Buying Guide” section on the home page of the FBG [linked here](#).

Not all traditional Indigenous foods contribute toward the CACFP meal pattern requirements; however, they may still be served. These foods may be included to round out the meal, improve acceptability, and satisfy participant’s appetites. For example, acorns do not credit toward the meats/meat alternates component due to their low protein and iron content, but may still be served alongside a reimbursable meal or snack ([7 CFR 226.20\(a\)\(5\)\(ii\)\(B\)](#)).

Another example, maple syrup, is a traditional Indigenous food that is often used in cooking or baking and does not credit toward a specific meal component. Maple syrup may be used in reimbursable meals, but does not contribute toward the CACFP meal pattern requirements. Program operators should contact the State agency that administers the CACFP with any questions about specific State guidelines and how traditional foods may credit in the CACFP. Traditional Indigenous foods may also be used during taste tests or other educational opportunities outside of the meal programs. To help children learn about where their food comes from and the cultural traditions associated with their food, USDA encourages Program operators to engage local, Indigenous knowledge-keepers, agricultural and ethnobotanical educators, and nutrition professionals to guide nutrition education. For more information, visit the [Farm to School Program website](#).

ALLOWABLE ACTIVITIES: The activities outlined below meet the programmatic purposes and goals of each respective ACF funding source. The following is not a list of required activities, but rather a list of allowable activities that Tribal leaders and program administrators may consider in addressing the unique circumstances in their nations and communities related to promoting Indigenous food sovereignty and food security. In general, there are several ways that ACF Tribal early childhood programs can promote Indigenous food sovereignty and food security. Details about promoting food sovereignty and security in specific programs are provided under each respective funding stream. Tribes may consider the following approaches across early childhood funding streams.

- Increasing access to and availability of healthy foods for children enrolled in the home visiting, child care, and/or Head Start program.
- Providing food during programming, including meals and snacks for children during program hours, home visits, group socialization activities, or parent and family engagement activities.
- Providing materials and equipment for center-based or home-based activities focused on Indigenous food sovereignty, such as supplies to create community and/or family gardens, greenhouses, and Indigenous seed hubs.
- Holding family engagement or program activities centering traditional methods of food procurement and processing such as fishing, planting or harvesting, or hunting.
- Ensuring intergenerational knowledge sharing on Indigenous foods and compensating individuals to provide programming on Indigenous foods within the program.
- Providing nutrition education.
- Foraging and harvesting Indigenous and wild plants as part of program activities.
- Cultivating and preparing traditional foods as part of program activities.
- Introducing and reintroducing Indigenous agriculture, diets, foods, and meal preparation.

This list is not intended to be exhaustive, and Tribes should contact their program specialist or federal project officer to understand allowable uses of funds specific to their community.

Child Care and Development Fund (CCDF)

Tribes may expend CCDF funds to cultivate, collect, prepare, and provide traditional foods in child care settings in the manner determined most appropriate by the Tribe. These practices provide children with healthy, nutrient-rich foods as well as critically important educational opportunities, and Tribes are encouraged to incorporate children into the processes of cultivating, collecting, or preparing traditional foods. CCDF funds expended for these activities should primarily be considered as quality expenditures and would count towards the minimum nine percent quality expenditure requirement for CCDF. However, if the Tribal CCDF lead agency is utilizing CCDF funds to incorporate traditional foods into a Tribally operated child care center, those expenditures may be considered either a quality expenditure or a direct services cost.

In addition to incorporating traditional foods into center-based child care settings, Tribal CCDF lead agencies should consider how CCDF could be utilized to assist in incorporating traditional foods in family child care or in-home care settings as well. Tribal lead agencies may utilize CCDF funds to provide meals and snacks during child care hours for children served through family child care or in-home care settings. These may include distributing items beyond food such as seeds or items to grow food, materials to prepare traditional foods, and instructional materials that child care providers could utilize to expand children's knowledge of traditional foods or nutrition.

Tribal CCDF Lead Agencies operating a Tribally operated child care center may also receive funding from other federal or state food assistance programs such as CACFP administered by the US Department of Agriculture (USDA) Food and Nutrition Service (FNS), but it is not a requirement. CCDF funds may be utilized independent of these programs, and other federal programs such as CACFP do not impose any limitations on allowable CCDF expenses, including the use of traditional foods in the classroom. Tribal CCDF Lead Agencies may also consider using CCDF funds to partner with local child care providers that are licensed or regulated through the state and serving children through the Tribal CCDF program to incorporate traditional foods in those settings.

Tribal CCDF Lead Agencies may also use CCDF funds to develop and or implement curriculum that includes Indigenous foods. Lead agencies may also consider contracting with experts in their nations and communities who can contribute to the development of a curriculum or who can provide learning experiences for children in care.

Head Start

Head Start nutrition services play an important role towards achieving healthy outcomes for children. The Head Start Program Performance Standards (Performance Standards) prioritize nutrition services that are culturally and developmentally appropriate and meet each child's individual needs. The standards provide flexibility for Tribal programs to support food sovereignty and food security according to local needs. OHS provided guidance on Affirming the Use of Indigenous Knowledge to Meet Curricula and Assessment Requirements in [American Indian and Alaska Native Head Start Programs](#) that describes the ways in which Tribes can use Indigenous Knowledge to develop and implement curricula. As such, food sovereignty can be incorporated into program curricula and activities, staff development, and family engagement activities. Tribes may use Head Start funds to pay for activities and programs such as field trips and excursions to expose children to traditional methods of growing and procuring food, compensating knowledge bearers and elders to serve as experts, and creating gardens or procuring materials to create traditional foods.

All Head Start grant recipients and their delegate agencies are required to participate in CACFP (45 CFR §1304.23 (b)(1)(i)). Children enrolled in Head Start are automatically eligible for free meals and snacks, including free milk, offered through any of the CNP administered by FNS, without further application or eligibility determination, subject to submission of a Head Start statement of income eligibility or income eligibility documentation by Head Start officials [7 CFR §226.17(b)(8), 7 CFR 220.7(e)(14)(ii)(E), and 7 CFR 210.9(b)(19)(v)].

Due to the variety of sizes and structures of Head Start grant recipients, they may participate in CACFP in several ways. In the cases of AIAN Head Start grant recipients, the recipient or the Tribe receives CACFP funding from the State and each Tribe decides how they will manage the food program for Head Start.

Meals and snacks in Head Start are funded by the USDA FNS' CNP. However, additional Head Start funds may also be used to cover any costs that are not provided by the USDA program. Tribal Head Start programs can be reimbursed for up to two meals and one snack or two snacks and one meal per day through CACFP. The amount of reimbursement an institution is eligible for depends on the number of meals and snacks served to children. All children enrolled in Head Start are reimbursed at the free rate. Head Start programs may not profit from CACFP. Any reimbursement in excess of food program expenses must be used to maintain, expand, or improve the institution's nonprofit food service

program. Meals and snacks paid for by CACFP may not be sent home with the child, as they must be consumed while the child is at the Head Start facility. Head Start funds may be used to pay for food that is provided to families for consumption at home, if they have a specific programmatic purpose related to family engagement.

Tribal MIECHV

The Tribal MIECHV program provides holistic support for young children and pregnant and new parents. The program aims to improve the overall health of children and families, including health and nutrition. Grant recipients can use their funds to support gatherings and meetings with food included, including traditional foods. Based on the grant recipient's community needs assessment findings, some grant recipients may decide to seek out a model or enhance their program design with teaching around traditional food, budgeting, and nutrition, and this can be done through home visits and/or group connections. Grant recipients can partner with food distribution programs to support the families enrolled in the program in gaining access to food. If there is a specific programmatic purpose (such as connection to a lesson or group connection activity on nutrition), program funds may be used to pay for food that is provided to families for consumption at home. Grant recipients screen families for unmet needs and work with families to connect them to resources, including the Supplemental Nutrition Assistance Program (SNAP), the Supplemental Nutrition Program for Women, Infants, and Children (WIC), and other food access programs.

RESOURCES:

ACF Resources

- [ACF Hunger, Nutrition, and Health Resource Hub](#)
- [Freedom From Hunger Initiative | The Administration for Children and Families \(hhs.gov\)](#)
- [Tribal Food Security, Nutrition, and Physical Activity Resource Guide: Ending Hunger and Improving Physical Wellness](#)
 - This resource guide provides information on federal resources that can address food insecurity and advance food sovereignty in Tribal communities.

OHS Resources

- [Nutrition Services Are a Health Equity Intervention](#) webinar briefly discusses food sovereignty in relationship to Tribal communities and Alaskan villages.
- [Cook's Corner: Recipes for Healthy Snacks](#), while not specific to AIAN communities, has many recipes that could easily be used, especially the ones for vegetables.
- [CACFP Meal Services in Head Start Programs](#) is a collection of four short videos (clipped from the longer 2022 webinar) that cover meal patterns, accommodations, reimbursement, and positive eating environments.

Administration for Native Americans (ANA) Resources

- [ANA Native American Heritage Month 2023 featuring webinars on Indigenous food sovereignty](#)
- [Restoring Kinship Networks and Resiliency Through Indigenous Seed Sovereignty](#)
- [Ending Hunger and Improving Physical Wellness in Native Communities | The Administration for Children and Families \(hhs.gov\)](#)
 - This webpage features the Resource Guide, past ANA food sovereignty webinar, plenary session from ANA Conference, and ANA success stories.

Tribal Early Childhood Research Center (TRC) Resources

- [Learning Circle on Indigenous Food Sovereignty in Early Childhood: Wiba Anung](#)
Partnership between Michigan State University and the Inter-Tribal Council of Michigan to support Tribal early childhood education programs in Michigan. Watch the recording to learn about the team's efforts to develop health-focused curricular materials grounded in connections to Indigenous food practices for use in tribal home visiting and Head Start programs.
- [Learning Circle on the Keres Children's Learning Center \(New Mexico\)](#)
The [Keres Children's Learning Center](#) team is engaged in Indigenous food sovereignty work from early childhood through adolescence in their Keres language and cultural immersion Montessori program. Watch the recording to learn about their community, how they are working with the land to self-sustain what they plant, grow, and harvest and the connection of this work with child, family, and community health, development, and well-being.
- [Learning Circle with Wicoie Nandagikendan \(Minnesota\)](#)
The [Wicoie Nandagikendan Sacred Foods Program](#) in Minneapolis shared how they are growing food, engaging families, connecting with the broader community, and finding creative solutions to support a vibrant Indigenous food sovereignty movement in the city.

USDA Resources

USDA has issued guidance and information on serving traditional Indigenous foods in a CNP such as CACFP. USDA FNS understands the importance of serving traditional Indigenous foods and encourages all operators of CNPs to source locally grown and raised foods. FNS has a variety of resources to assist CNP operators in determining how traditional Indigenous foods may contribute toward a reimbursable meal. Guidance and information on [crediting traditional Indigenous foods in child nutrition programs can be found](#) on the [Serving Traditional Indigenous Food in Child Nutrition Programs webpage](#). USDA has also issued guidance and information on feeding infants and the infant meal pattern requirements in CACFP, including guidance on reimbursable infant meals that include breastmilk, breastmilk, and breastfeeding onsite. For more information, see CACFP [11-2023, Feeding Infants and Meal Pattern Requirements in the CACFP: Questions and Answers](#).

- [Nutrition Standards for CACFP Meals and Snacks](#)
- [Food Buying Guide for Child Nutrition Programs | Food and Nutrition Service](#)
- [Crediting Handbook for CACFP | Food and Nutrition Service](#)
- [Information on breastfeeding onsite can be found within this policy memo on meal pattern requirements.](#)
[Child and Adult Care Food Program Contacts](#)
- [USDA Website – Serving Traditional Indigenous Foods](#) in Child Nutrition Programs
- [Procuring Local Meat, Poultry, Game and Eggs for Child Nutrition Programs | Food and Nutrition Service](#)
- [Crediting Traditional Indigenous Foods in Child Nutrition Programs | Food and Nutrition Service](#)
- [USDA Indigenous Food Sovereignty Initiative](#)

QUESTIONS: Please direct inquiries to the appropriate office:

- Contact the Regional Program Manager in the appropriate OCC Regional Office. Contact information for OCC regions can be found at <https://www.acf.hhs.gov/occ/resource/regional-child-care-program-managers>.

- Contact the OHS Region XI Program Office with any questions.
- Contact your Tribal MIECHV Federal Project Officer with any questions.

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