

# Tribal Nursing Home Best Practices

## Traditional Foods

Department of Health & Human Services, Centers for Medicare & Medicaid Services

# Tribal Nursing Home Best Practices: Traditional Foods

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## Introduction

Maintaining and improving quality of life are key goals for any nursing home facility or elder care program. Making elder residents as comfortable as possible is important to everyone involved—families, staff, and the community.

“We want to promote quality of life and make sure our residents feel as close to home as they possibly can,” says Melissa Chlupach, a regional health care dietitian for Nana Management Services, which offers food services to tribal nursing facilities in Alaska.

Traditional foods are an important link to honor elders and make a nursing home facility “home.”

## Benefits of Traditional Foods

Incorporating traditional foods into your nursing facility or elder food program menu aligns with the Triple Aim of improving health care—better care through enhanced quality and satisfaction, better health, and reduced costs.

### Better Care

Residents are more satisfied with their dining experience because they enjoy foods that they are familiar with and that have cultural significance to them. Incorporating traditional foods often involves family and community members, which gives elders greater positive contact with their communities. They enjoy knowing where the food was harvested or who the hunter was. Elder engagement during meals also increases.

*“These are the foods they grew up on. These are the foods they’re comfortable with—home cooking, if you will.”*

– Val Kreil  
The Maniilaq Association

Valdeko (Val) Kreil with the Maniilaq Association says they serve traditional foods, like caribou and moose, to elders at the Utuqqanaat Inaat nursing home in Kotzebue, AK. A benefit of serving traditional foods is that “it makes the residents feel more at home,” says Tami Reed, the Interim Administrator of the Morning Star Care Center in Fort Washakie, WY. “The residents love it. They’re excited when we bring in something different or something that they requested.... Dried meat is just really a favorite because it’s ground up. It’s easy for them to chew. Sometimes it’s mixed with lard or berries, so it’s a good source of protein for them.”

### Better Health

When residents are served food they want and like, they eat more of it. Elders are also better able to maintain healthy weights. Since traditional foods were introduced at Utuqqanaat Inaat, residents have shown fewer depressive symptoms and are more engaged at mealtimes.

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In addition, traditional foods are often healthier choices. Tohono O'odham's Archie Hendricks, Sr. Skilled Nursing Facility serves traditional foods that are high in fiber as a way to combat diabetes, says Andrea Barnes, an occupational therapist at the nursing facility. "The foods that people ate in the past—beans and corn tortillas and wild spinach and squash and all of the things that people use[d] to eat before things were all preserved—these things were freshly made," she says. "If they're used now and incorporated, they will help to lower peoples['] blood sugar and their glycemic index."

### Smarter Spending

Serving traditional foods can lower costs by reducing food waste, because elders eat more of the foods that they like. In addition, traditional foods can be higher in fiber and denser, meaning elders are often satisfied by eating less than more processed foods, says Debbie Dyjak, the education coordinator at the Archie Hendricks, Sr. Skilled Nursing Facility.

Traditional foods sourced through hunter and gatherer donations may create cost savings, especially in areas where transportation costs for food are high. Kreil says that for every \$100 the Maniilaq Association spends on gas and bullets for hunters, they get \$300 worth of meat.

Tribes can also save money and reap community-building benefits by producing traditional foods themselves—through tribal farms and ranching activities or even smaller-scale gardens at nursing facilities.

At Tohono O'odham's Archie Hendricks, Sr. Skilled Nursing Facility, a small garden produces peppers, squash, tomatoes, and more. Barnes says the residents benefit from getting out in the garden, and that it could be expanded if 4H children were to take it on as a project. A 4H partnership would further benefit the facility's residents by putting them in more contact with youth.

The Eastern Shoshone Tribe recently began ranching bison, which it hopes will supply its Morning Star Care Center in the future, says the center's interim administrator, Tami Reed.

## Developing a Traditional Foods Menu

Serving traditional foods in tribal nursing home facilities requires the coordination and cooperation of a number of different players, including staff; suppliers; regulators; and, of utmost importance, the residents themselves.

### Involving Elders

The first step for any traditional foods program is finding out which foods elders desire, and which are most important to them. Their rights, preferences, and choices must be respected.

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In Kotzebue, the elders “were the ones that said, ‘We want our foods on our menu.’ They weren’t very happy,” says Chlupach. “Their voices were heard.”

Staff can begin to determine their residents’ food preferences by surveying them or conducting regular meetings about the menu. This process can occur on the individual level or by consulting with resident councils. At the [Laguna Rainbow Corporation Nursing Facility](#) in Casa Blanca, NM, elders on the menu committee meet once a month with the dietary manager to discuss their preferences.

Prioritizing which traditional foods residents want most is important because each food may require a different supplier or procedure to obtain it. Knowing which traditional foods elders want most will guide staff in which foods to pursue first.

Elders can also give guidance about traditional foods that may have been forgotten by younger generations. The San Carlos Apache worked with elders for the [Western Apache Diet Project](#) to create a database of traditional foods (Pilsk, 2014). The project’s goal is to analyze the foods’ nutrient content and design a healthy, pre-reservation menu to reverse diet-related illnesses. “The elders are the ones that have all of that information, and it must be maintained and

passed down, or...it could be lost,” says Chlupach. Elders play a crucial role in helping understand the history of the local food system (the Centers for Disease Control and Prevention, 2015).

It is important to recognize that not all residents prefer all traditional foods. Sometimes, balancing traditional and nontraditional foods is the best approach. Let the residents guide you.

### Involving Staff and the Community

For a traditional foods program to work, nursing facility staff and community leaders must be on the same page when supporting the program. Dietitians’ concerns about traditional foods’ nutritional value and impacts on health conditions must be addressed. Administrators and tribal leaders must be ready to work with regulators.

Set up a traditional food committee in your nursing home. Traditional food research, planning, and menu development should occur internally before staff approach vendors and regulatory agencies. That way, you can present a unified and clear vision of the program you wish to create.

### Sourcing and Serving Traditional Foods

Nursing homes must typically take more active roles in sourcing traditional foods than other items on their menus since these foods are not readily available through established commercial food vendors. Creative solutions are often necessary. These solutions require coordination with federal, state, and local agencies to comply with food safety regulations.

Some foods may be especially desired, but particularly challenging to serve. For Utuqqanaat Inaat residents, that food is seal oil. The nursing facility is currently prohibited from serving it because of the risk of botulism. The Maniilaq Association is working with regulators and researchers to develop a process that ensures safety measures for providing food-grade seal oil.

An intermediary step in such cases can be sponsoring potlucks until regulations and procedures are developed that allows facilities to serve traditional foods from their kitchens. According to federal regulation F-371, which governs nursing home food procurement, storage, and preparation requirements, all residents have the right to accept food brought to the facility by visitors (Centers for Medicare & Medicaid Services, 2009). Thus, families and friends can bring in traditional foods to share even if the facility is legally unable to prepare those dishes itself. Traditional foods that are otherwise unavailable—like seal oil—may be offered to residents in this way. At Utuqqanaat Inaat, residents sign waivers saying they understand the risks and that it is a prohibited food in Alaska.

Supplying nursing homes with traditional foods can also help tribal agriculture businesses succeed. Plus, involving elders and their wisdom in these businesses affirms elders' value. Elders serve as advisors for the [San Xavier Co-op Farm's](#) traditional food agribusiness in Tucson, AZ. [Tohono O'odham's agriculture program](#) educates school children about traditional foods and supplies it for their meals. Such a program could also supply a nursing home or elder meal program.

In another Alaska traditional food solution, the Maniilaq Association worked with the Centers for Medicare & Medicaid Services to declare the tundra their "garden" so they could harvest traditional fruits, berries, and beach greens.

For the Maniilaq Association, serving its nursing facility residents foods like musk ox stew and caribou required establishing a meat processing plant in 2015 to butcher hunters' donations. Food safety at the plant is overseen by the Alaska Department of Environmental Conservation.

## Working with Local, State, and Federal Agencies

Many food regulations and guidelines are not written to accommodate traditional foods that are hunted and gathered, rather than raised and farmed. Tribal nursing homes must work with local, state, and federal agencies to ensure they are complying with existing regulations. It may be unclear at first which agency has jurisdiction. In some instances, new regulations must be written or existing regulations must be amended.

Some tribes are working on writing their own food codes, says Dyjak.

Tribal nursing homes will be most successful if they take the lead and coordinate the consultation and negotiation process with government agencies.

Recommendations:

- Reach out to Uniting Nursing Homes in Tribal Excellence (U.N.I.T.E.) for information and possible solutions. Members have successfully implemented traditional foods programs in their nursing homes and can offer suggestions for how to best work with regulators.
- Consult with your state Centers for Medicare & Medicaid Services office, which will have experience navigating issues surrounding nursing facility food services.
- Educate agency staff about traditional foods—why they are important, how they can be sourced, and how they are safe and nutritious.
- Be familiar with the Farm Bill, state food code, and other relevant regulations before you begin discussions.
- Set up meetings or conference calls with all relevant agencies in attendance. It may be unclear who has jurisdiction, or different agencies may have authority over different parts of the process. Having everyone together makes it easier to resolve disputes and come up with solutions.

“I just would encourage other nursing homes to not give up and keep pursuing providing traditional foods.”

– Tami Reed  
Eastern Shoshone Tribe  
Morning Star Care Center

“One of the things you learn when you bring different agencies together is that, sometimes, there’s something you may not have considered,” says Kreil, who added that being open to new information and creative solutions is essential. The Maniilaq Association worked with the U.S. Food and Drug Administration, the Alaska Department of Environmental Conservation, the Centers for Medicare & Medicaid Services, and many other agencies to create its traditional foods program.

### Conclusion

Traditional foods enhance the quality of life and health of tribal nursing home residents by honoring their experience. Tribal nursing homes that are ambitious with their traditional food programs can reap wonderful rewards in terms of happier residents and potential cost savings.

Essential ingredients for a traditional foods program include consultation with residents and staff; the creation of sourcing solutions; and coordination with local, state, and federal regulators.

“I think the traditional foods program will probably get to the point where we don’t even discuss it as ‘traditional foods,’ says Kreil. “ We’ll just say it’s ‘their food.’”

### Resources

Use these resources to learn more about traditional foods, how to add them to your nursing home menu, and regulations governing the use of traditional foods in nursing facilities and elder care programs.

#### Organizations

<a href="#">Uniting Nursing Homes in Tribal Excellence (U.N.I.T.E.)</a>	This organization of tribal nursing home administrators, board members, educators, and staff establishes best practices and provides training for tribal nursing homes. Bringing traditional foods to tribal nursing homes is a core activity and area of expertise for group members. <a href="#">Contact U.N.I.T.E.</a> for technical support on traditional food programs.
<a href="#">University of Arkansas School of Law Indigenous Food and Agriculture Initiative</a>	This initiative enhances health and wellness in tribal communities by advancing healthy food systems, diversified economic development, and cultural food traditions in Indian Country.

### Guides and Case Studies

<a href="#">From Tundra to Table</a>	This case study follows the journey of the Utuqqanaat Inaat Nursing Care Center's successful efforts to bring traditional foods to its residents.
<a href="#">Healthy Traditional Alaskan Foods in Food Service Programs</a>	This toolkit outlines the kinds of traditional foods that can and can be donated, how to safely process donations, and who to contact for more information.
<a href="#">Pioneer Network's Dining Practice Standards</a>	These nationally agreed upon food and dining standards of practice support individualized care and self-directed living versus traditional, diagnosis-focused treatment for people living in nursing homes.
<a href="#">Pioneer Network's Promising Practices in Dining: Transforming the Institutional Dining Experience</a>	Learn how you can transform your nursing facility's dining experience to create a more dignified and pleasurable experience for residents.
<a href="#">Store Outside Your Door</a>	This Alaska Native Tribal Health Consortium program provides information about living healthy off the land, including through hunting, fishing, gathering, and growing.
<a href="#">National Native Network's Traditional Foods Resource Guide</a>	This guide offers resources and tools about Native traditional foods in the Indian Health Service areas of Alaska, California, Great Plains, and Portland. Find information about books, posters, and websites on traditional foods.

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### Webinars

<a href="#">Tribal Nursing Homes: Traditional Foods, Traditional Lives</a>	This recorded webinar explores how traditional foods enhance Native elders' quality of life, describes how they relate to the Triple Aim, and explores ways tribal nursing homes can incorporate traditional foods into their menus.
<a href="#">Tribal Nursing Homes: A Seat at the Table</a>	This recorded webinar explores how to effectively communicate with stakeholders and negotiate with regulators about traditional foods. It includes a role-playing example of a tribal nursing home discussing seal oil with regulatory agencies.

### Regulations and Resolutions

<a href="#">Alaska Food Code—Traditional Foods</a>	The Alaska Food Code allows the donation of traditional wild game meat, seafood, plants, and other food to the food service of an institution or a nonprofit program, with the exception of certain foods that are prohibited because of significant health hazards. Examples of facilities that can accept these donations include residential facilities, school lunch programs, head start programs, and elder meal programs.
<a href="#">H.R.2642 - Agricultural Act of 2014</a> (Farm Bill)	Farm Bill Section 4033 allows for the donation of traditional foods to long-term care facilities and senior meal programs. It includes wild game, fish, marine mammals, plants, and berries. It also provides tribes or tribal organizations with a waiver of liability against civil actions arising from harm caused by donated traditional foods.
<a href="#">Federal Nursing Home F-371 Food Procurement Guidance</a>	§483.35(i) F-371 details food procurement, storage, and preparation requirements for nursing homes. This guidance clarifies that these requirements do not restrict resident choices. All residents have the right to accept food brought to the facility by any visitor(s) for any resident.

### Regulations and Resolutions

[National Indian Council on Aging \(NICOA\)  
Resolution #2016-01](#)

This resolution was passed by NICOA to support the implementation of serving traditional food in public facilities, specifically for programs serving tribal elders living in hospitals, clinics, long-term care facilities, and senior meal programs. The council supports the following methods to accomplish an elder-centered approach: community food donations, use of local vendors, effective tribal food code procedures, development of traditional food councils in long-term care facilities that receive support from tribal leadership and federal, state, and local regulatory agencies. This resolution came to pass based on the passage of the Farm Bill Section 4033.

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