

Date: April 30, 2015

To: Authorized Representatives and Food Service Directors of School Food Authorities (SFAs) participating in the U.S. Department of Agriculture (USDA) Child Nutrition Programs

From: Jessica Sharkus, RDN, CD
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Subject: USDA's Final Rule: *Professional Standards for State and Local School Nutrition Programs Personnel as required by the Healthy, Hunger-Free Kids Act of 2010*

Please share this information with your Business Manager and the Human Resource Department, who need to consider this information when budgeting and when hiring new staff.

USDA's Food and Nutrition Service (FNS) has released the final rule which establishes minimum professional standards for school nutrition personnel who manage and operate the National School Lunch and School Breakfast Programs. This final rule institutes hiring standards for the selection of State and local school nutrition program directors and requires all personnel in the school nutrition programs to complete annual continuing education/training. These regulations are expected to result in consistent, national professional standards that strengthen the ability of school nutrition professionals and staff to perform their duties effectively and efficiently. **This may have implications in your school's annual budget or personnel staffing.**

This final rule, *Professional Standards for State and Local School Nutrition Programs Personnel as Required by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA)*, which amends 7 CFR Parts 210 and 235, will become effective July 1, 2015. It does include several built-in flexibilities intended to facilitate the first year of implementation. New school nutrition program directors hired on or after July 1, 2015, will need to meet hiring standards.

Continuing education/training requirements will apply to all current and newly hired personnel effective July 1, 2015. Required training topic areas and number of continuing education hours will vary depending on the position and job description of the school nutrition program staff. The enclosed chart summarizes the required minimum training and education standards, for all Local Education Agency (LEA), plus SFA director hiring standards, separated by the enrollment size of the SFA. **Please note:** A director with responsibilities for more than one SFA must meet the requirement of the total enrollment of all SFAs under his or her management.

The hiring requirements and continuing education/training requirements apply to the highest level of duties for your SFA. Please refer to the following definitions of school nutrition staff and the minimum hours of continuing education/training required for school year (SY) 2015-2016 below.

School Nutrition Program Director: A school nutrition program director is defined as an individual directly responsible for the management of the day-to-day operations of school nutrition programs for all participating schools under the jurisdiction of the SFA.

- School nutrition program directors (those hired on or after July 1, 2015) are subject to the new education hiring requirements. Existing directors will be grandfathered in their current positions as well as in the student enrollment category where they are working. The enclosed chart summarizes the minimum education standards for all new directors as well as the minimum continuing education for all nutrition program staff.
- For all newly hired directors, there is a requirement of at least eight (8) hours of food safety training within the past five (5) years or to complete eight (8) hours of food safety training within 30 calendar days of their starting date.
- Directors must also complete at least eight (8) hours of annual continuing education or training in administrative practices (including training in application, certification, verification, meal counting and claiming procedures) and any other topics as determined by FNS, as needed, to address School Nutrition Program integrity or other critical issues. **This will increase to twelve (12) hours starting July 1, 2016.**

School Nutrition Program Manager: A school nutrition program manager is defined as an individual directly responsible for the management of the day-to-day operations of the school nutrition programs for one or more participating schools.

- New managers do not have minimum hiring standards or the food safety training requirement.
- Managers must complete at least six (6) hours of annual continuing education or training in the following topics: administrative practices (including training in application, certification, verification, meal counting and claiming procedures), the identification of reimbursable meals at the point of service, nutrition, health and safety standards, or any other topics as determined by FNS, as needed, to address School Nutrition Program integrity or other critical issues. **This will increase to ten (10) hours starting July 1, 2016.**

School Nutrition Program Staff: School nutrition program staff is those individuals, without management responsibilities, involved in day-to-day operations of school food service for one or more participating schools.

- New school nutrition staff members do not have minimum hiring standards or the food safety training requirement.
- All staff, except directors and managers, with responsibility for the school nutrition programs must complete continuing education or training in areas applicable to their job. Specifically, personnel that work an average of at least 20 hours per week must complete at least four (4) hours (**increasing to 6 hours starting July 1, 2016**), and staff working less than an average of 20 hours per week must complete at least four (4) hours of continuing education/training.

- Continuing education and training may include the following topics (as applicable to their position and responsibilities): free and reduced-price eligibility, application, certification and verification procedures; the identification of reimbursable meals at the point of service, nutrition, health and safety standards; and any other appropriate topics as determined by FNS, as needed, to address School Nutrition Program integrity or other critical issues.

General Professional Standards Information:

- The final rule allows for a variety of training formats, both online (webinars, interactive online sessions, etc.) and in-person (classroom training, in-service training, seminars, public speakers, etc.).
- For the SY 2015-16, training received three months prior to July 1, 2015 (so April 1, 2015 onward) may count toward the first year training requirements for all directors, managers, and staff.
- Training from a variety of sources is also acceptable, including free or low-cost options. These may include the National Food Service Management Institute (NFSMI), State agencies (Department of Public Instruction, School Nutrition Team), FNS Team Nutrition, the School Nutrition Association (SNA), professional associations/organizations, in-house training (SFA level), and reputable commercial vendors. Visit [USDAs Professional Standards](#) website to search for trainings.
- The SFA is responsible for documenting the annual continuing education opportunities for each employee.
- The USDA has developed an optional downloadable tool to help the school nutrition program directors keep track of the training activities at the SFA level. Documentation such as copies of the training agenda, sign-up sheets, and other paper documents would also be acceptable.
- Monitoring of an SFA's compliance with the professional standards rule will be addressed through the Administrative Review process.
- Current school nutrition program directors will be able to remain in their positions or transfer to a similar position in another LEA of the same size category without having to meet the new hiring standards. However, to move to a larger LEA size, a grandfathered program director must meet the hiring standards established for the larger LEA.
- Annual continuing education/training is an allowable use of the nonprofit school food service account. The training costs must be reasonable, allocable, and necessary in accordance with the cost principles set forth in 2 CFR part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.

Further information may be found on [DPI's Professional Standards](#) website or on [USDA's Professional Standards](#) website.

For questions regarding professional standards, please contact Gina Kulka, Nutrition Program Consultant, at Gina.kulka@dpi.wi.gov or 608-266-5770.