

Professional Standards - Local School Nutrition Programs Personnel

Frequently Asked Questions (FAQs)

The purpose of this U.S. Department of Agriculture final rule, “*Professional Standards for State and Local School Nutrition Programs Personnel as Required by the Healthy, Hunger-Free Kids Act of 2010*”, is to establish minimum professional standards for school nutrition personnel who manage and operate the National School Lunch Program (NSLP) and School Breakfast Program (SBP). It 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.

This is a selection of questions that have been fielded by the Wisconsin Department of Public Instruction (DPI) along with some of the pertinent FAQs from a USDA memo SP 39-2015 from June 25, 2015, found at this link <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-39-2015s.pdf>.

Definitions for director and manager positions in the School Nutrition Program:

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.

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.

Minimum Hiring Requirements for NEW Directors in School Food Authorities (SFAs)

*Each SFA must designate at least one staff member as a program “director.”

*Current directors are exempt from the minimum education requirements as they were hired before the Professional Standards rule was in place, effective July 1, 2015.

*A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.

Q1. For small local educational agencies (LEAs), less than 500 students, the State agency had the discretion to approve a LEA’s hiring of a school nutrition program director that has a high school diploma (or GED) but less than the 3 years of relevant program experience. What did DPI decide to be the minimum requirement?

A1. The NEW school nutrition program director of a small LEA should have at least one (1) year of relevant school nutrition program experience plus the education requirement.

Q2. Are temporary or acting school nutrition program directors, who are expected to work more than 30 business days, required to meet the hiring standards?

A2. Yes, it is important to ensure the integrity and quality of School Nutrition Programs. Therefore, all NEW directors must meet the minimum hiring requirements.

Q3. The second option for each LEA size says “Bachelor’s degree, or equivalent educational experience, with any academic major or area of concentration, and a State-recognized certificate for school nutrition directors”. What is acceptable as a State-recognized certification?

A3. The DPI is working toward developing a State-recognized certificate of achievement for Wisconsin school nutrition professionals that complete certain training requirements in the areas of school nutrition and school food service management. Signed by the State Superintendent, the certificate will provide credibility that the recipient has the training and knowledge required to successfully operate school nutrition programs. Certificates provided by the School Nutrition Association or other associations may be applied toward the State-recognized certificate but will not replace it.

Training Requirements

* Training should be job-specific for each staff member working in the school nutrition program. Trainings after April 1, 2015, may count toward continuing education.

* The 4 key areas of training are: nutrition, operations, administration, and communications and marketing.

* Trainings must be documented. A tracking tool must include staff name, hiring date and employee category, training title/subject, date and length of training time. The USDA Tracking Tool is available as one way to document school nutrition staff training hours http://www.fns.usda.gov/trainingtracker/TrainingTracker_ver1.0.accdb; this is in Access format. Similar tracking tools are available on the [DPI Professional Standards](#) webpage for Excel and Google spreadsheets.

* Training time is logged as minute for minute of appropriate training and 1 CEU equals 60 minutes.

* Key Area of Learning and Key Topic Learning Codes are available here: http://www.fns.usda.gov/sites/default/files/cn/ps_learningobjectives.pdf.

Q4. Which staff members need to complete annual training?

A4. All school nutrition program staff need to receive annual training. Generally, program staff will include individuals such as cooks, servers, and others who are involved in the preparation and service of school meals; individuals that are involved in other program operations such as eligibility determinations, meal counting and claiming; individuals at the point of service to recognize and count the meal such as cashiers, breakfast in the classroom teachers, and other program operators; and support staff that may have an impact on the safety of school meals.

Staff working on program activities generally 20 hours or more per week must complete 6 hours of annual training (4 hours in SY 2015-16). Staff working less than 20 hours per week must complete 4 hours of annual training.

However, a person who provides support to, but is not specifically involved in, the operation of the school nutrition program, such as the cleaning custodian or delivery driver, is not required to meet the training standards (even if they are paid using nonprofit food service account funds).

The program director or manager must examine the job duties of program staff to determine what job-specific training they need to perform their jobs effectively and in compliance with program regulations.

Q5. Are food delivery employees servicing the school nutrition program required to complete the training standards for staff?

A5. This final rule seeks to establish practical training requirements that assure the success of the school nutrition program. The SFA program director must work with the managers and staff to determine the local training needs. In this example, if the food delivery employee monitors refrigeration, food temperatures, inventory/delivery sheets, etc., then he/she is expected to complete annual training on topics such as proper handling, delivery and storage of perishable food products to ensure the safety of school meals and prevent food waste. Otherwise, training is not required.

Q6 (revised). Do acting personnel, temporary workers, student workers, and volunteers need to complete annual training?

A6. Yes, if their duties involve specified school nutrition activities, all acting personnel, temporary workers, and volunteers (occasional and regular) need to complete annual training. They should receive basic training in civil rights and job-specific training, such as food safety, offer versus serve, and point of service depending on the position in which they work. They should receive a minimum of 4 hours of training on an annual basis. Student employees may be exempt from the required training, depending on the scope of their duties.

Q7. If a school has part-time employees with cognitive disabilities, do they have to also meet training requirements?

A7. All staff members that are involved in the operation of the NSLP must complete appropriate training that is related to their job duties. If necessary, the

program director should discuss the training content and format for this individual with the State agency.

Q8. What if school nutrition employees are hired during the school year?

A8. New staff members must receive and document training; however, if they are hired after January 1 of any school year, they will need half of the training requirement hours for that school year.

Q9. Do all school nutrition staff need food safety training?

A9. Not necessarily, however, it is advisable to constantly focus on food safety. A new Wisconsin law, ACT 46, passed in July 2015, states that any operator of a school lunch room must hold a certificate of food protective practices from the Wisconsin Department of Health Services (DHS). One person in each district must have this certificate to be compliant with the law. This person should be the one responsible for food safety in the district and should work with schools to ensure safe food is being served to Wisconsin students. This link to DHS lists training resources <https://www.dhs.wisconsin.gov/fsrl/certificates.htm>.

Q10. How can I plan my trainings to be sure they meet the established training standards?

A10. Annual training must be relevant to the job duties. To learn about these specific objectives, please refer to the training topics and objectives listed at: http://www.fns.usda.gov/sites/default/files/cn/ps_learningtopics.pdf
http://www.fns.usda.gov/sites/default/files/cn/ps_learningobjectives.pdf

Q11. May the school nutrition employees select any training topic they want?

A11. Allowable training should focus on the day-to-day management and operation of the school nutrition programs. As a guide when planning your training, use the list of key training areas and topics available at http://www.fns.usda.gov/sites/default/files/cn/ps_learningtopics.pdf.

Training must be job-specific and intended to help employees perform their duties well. Training needs are best assessed by an employee in consultation with their manager, the SFA director, or a DPI consultant. Employees should always seek guidance from a supervisor before taking a specific training course to meet the professional standards requirements.

Q12. Does ServSafe or another food safety class count as trackable training hours?

A12. Yes, ServSafe and comparable food safety training does count as trackable instruction hours.

Q13. Does annual civil rights training and blood-borne pathogen training provided by the school district count towards the annual training standards?

A13. Yes. Civil rights training may contribute to proper administration of the program if it covers topics that are relevant for school nutrition program employees, such as the civil rights provision in §210.23(b) of the NSLP regulations, the FNS Instruction 783.2, meal substitutions for medical or other special dietary needs, and issues that may limit equal access to school meals. Blood-borne pathogen training also count under the Topic Area of Food

Safety/HACCP (code 2600), and more specifically Federal, State, and Local Food Safety Regulations (code 2630).

Q14. Does back to school training on security procedures, building operations, etc., count toward the annual training standards?

A14. No. Only training that fosters proper administration and operation of the school nutrition programs counts toward the training standards. To identify appropriate training topics for various school nutrition program personnel, visit http://www.fns.usda.gov/sites/default/files/cn/ps_learningtopics.pdf.

Q15. Will the State agency consider assessing compliance of the training requirement over the period of two (2) years instead of just the current year?

A15. Yes, DPI will allow school nutrition program staff to complete the training requirement over a two (2) year period. However, some hours need to be obtained in both years. For example, if you are a school nutrition program director and are required to have 8 hours of training for SY 2015-16 and 12 hours for SY 2016-17, the director can receive 6 hours for SY 2015-16 and 14 hours for SY 2016-17. Because some required trainings, such as civil rights, are conducted annually, it should not be an issue for food service staff to obtain training hours on an annual basis.

Q16. How many hours of training do assistant managers and assistant directors have to meet each year?

A16. The final rule does not establish specific training requirements for assistant managers and assistant directors. If the assistant manager and assistant director do not hold the primary responsibility of the “manager” and “director” position as defined in the final Professional Standards regulation, then they would have to meet the annual training requirements for non-managerial food service staff. Under the Professional Standards rule they would have to meet 6 hours of annual training (4 hours in SY 2015-16). If working less than 20 hours per week, they would have to complete 4 hours of annual training.

Q17. When school food service directors receive training and then provide the same training to their staff, can food service directors count both trainings as part of their training hours? For example, if they receive 1 hour of training and then provide 1 hour of training to their staff, can they get credit for 2 hours?

A17. Yes; a “train-the-trainer experience” that allows a SFA director to receive and disseminate knowledge may count toward the director’s annual training hours. However, if the SFA director is teaching food safety twice to two different groups, she/he may only count teaching it once toward required continuing education hours.

Q18. Does the monthly Wisconsin DPI listening session, “What’s New with School Nutrition?” count for training hours?

A18. Yes; that training time would count minute for minute of instruction under the general Communications & Marketing Learning Code of 4100. That session is held the second Tuesday of the month at 2:00 PM.

Q19. Are school nutrition staff able to count time spent at food/industry shows or exhibits as continuing education hours?

A19. Yes, DPI has decided that a maximum of 1 hour (60 minutes) may be collected in one year for attending food shows as continuing education.

Professional Standards - Food Service Management Companies (FSMC)

Q20. Do the training standards apply to employees of a FSMC, and who is responsible for providing and tracking the training?

A20. Yes; the SFA director must ensure that the FSMC employees providing services for the school meal programs have the required annual training. Therefore, the SFA must require the FSMC to provide documentation showing the training hours and topics completed by the employees. Contracts for SY 2015-16 that do not include this language will probably need to be amended to include additional language to reflect compliance with professional standards requirements. The SFA director may work with the FSMC to identify appropriate training resources, such as those listed at the professional standards website at <http://professionalstandards.nal.usda.gov> and a system to track the training.

Q21. If a FSMC staff person performs food service director type duties, but reports to a district business manager who is responsible for the school district's school food service activities, who is required to comply with the professional standards requirements?

A21. Both individuals would be responsible for meeting the training standards for program directors. Discuss unique situations with your DPI consultant to seek guidance.

Q22. Does the implementation of professional standards in the middle of a contract constitute a material change?

A22. The scope of contracts with FSMCs varies from one SFA to another. FSMC solicitation and contract documents that do not include provisions for the FSMC to comply with the professional standards requirements and provide documentation to support compliance will need to be amended to include this language. Please contact DPI for a prototype amendment to complete.

Training Topics and Learning Codes

Some trainings presented by the DPI SNT, USDA FNS, and other professional organizations have assigned Learning Topics and Learning Codes relevant to the training content. It is advisable to use these codes, but it is not a requirement to specify Learning Codes for the trainings to credit toward continuing education hours. The link to the Learning Topics is http://www.fns.usda.gov/sites/default/files/cn/ps_learningtopics.pdf.

It is recommended to find low or no-cost trainings that meet the needs of the program staff. These are some valuable resources:

This USDA link <http://professionalstandards.nal.usda.gov/content/find-training> provides many training resources, as well as The Institute of Child Nutrition (formerly National Food Service Management Institute) <http://theicn.org/>.

The DPI website offers specifics on different trainings throughout the year: <http://dpi.wi.gov/school-nutrition/training>. There are opportunities for in-person training, online webcasts, or the popular “What’s New in School Nutrition?” offered every month on the second Tuesday at 2:00 PM <http://dpi.wi.gov/school-nutrition/training#rec>

USDA has a website specific to Professional Standards: <http://professionalstandards.nal.usda.gov/content/professional-standards-information>

Other sources may be professional associations, such as School Nutrition Association <https://schoolnutrition.org/> or Academy of Nutrition and Dietetics <http://www.eatright.org/>

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