

Date: September 13, 2016
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: Professional Standards Updates and Reminders

The USDA issued policy memorandum [SP 38-2016](#) titled *Questions & Answers (Q&As) on the Final Rule “Professional Standards for State and Local School Nutrition Programs Personnel as Required by the Healthy, Hunger-Free Kids Act of 2010.”* The Department of Public Instruction (DPI) School Nutrition Team (SNT) would like to point out a few new and/or revised Q&As that were added.

Important reminder: Starting in school year (SY) 2016-17, the number of required annual training hours increases to the permanent number. Below are the required hours based on position.

- Director: 12 hours
- Manager: 10 hours
- Full-time staff: 6 hours
- Part-time staff (less than 20 hours per week): 4 hours

Questions and Answers

Question	Answer
1. May a SFA use the nonprofit school food service account or the local education agency (LEA) general fund to pay the salary of a new program director who is pursuing a college degree but does not yet meet the hiring standards?	SFAs may not use the nonprofit school food service account to pay the salary of a new school nutrition program director (hired on or after July 1, 2015) who does not meet the hiring standards. Using funds to support non-compliance is considered an unallowable cost. However, the LEAs general fund account could be used to pay the salary of a new director who is actively pursuing the minimum education and other requirements outlined in a corrective action plan to meet the hiring standards.

Question	Answer
<p>2. How do the training standards apply when the program director duties are divided between three or four staff members, and no one clearly meets the definition of program director? For example, an administrative assistant completes the meal applications, a cook serves the meals, a secretary or teacher runs the point of service and prints out reports, and another staff person submits the claims for reimbursement.</p>	<p>The individual(s) who plans, administers, implements, monitors, and evaluates all aspects of the school nutrition program is generally considered the school nutrition program director. Program director duties generally include the following: sanitation, food and employee safety, nutrition and menu planning, food production, facility layout and design, equipment selection, procurement, financial management and recordkeeping, program accountability, marketing, customer service, nutrition education, general management, personnel management, and computer technology. Only the person who performs the majority of these duties must meet the training standards for program directors. All other staff would fulfill training requirements in their category.</p>
<p>3. Do the definitions established in the final rule apply to volunteers serving as school nutrition program managers or directors?</p>	<p>The DPI has discretion to extend the training standards to volunteers at all levels, including those serving as school nutrition program managers or directors. The DPI SNT has elected to require the same training standards for volunteer staff serving as school nutrition program managers or directors.</p>
<p>4. Do the professional standards apply to the Wellness Coordinator or the person who oversees the local wellness policy implementation?</p>	<p>If the Wellness Coordinator or person who oversees the local wellness policy implementation is not involved in the day-to-day operation of the school meal programs, then he/she is not expected to meet the annual training requirements.</p>
<p>5. Does back to school training on security procedures, building operations, etc. count toward the annual training standards?</p>	<p>No. Only training that fosters proper administration and operation of the school nutrition programs counts toward the training standards. This is different from the original DPI interpretation.</p>
<p>6. Please clarify the expectations for “temporary”, “substitute”, and “acting” staff positions and how the individuals in these situations are affected by training standards. How are volunteers handled?</p>	<p>The final rule gives DPI the option to extend the training standards to acting, temporary, and substitute staff. DPI has elected to require the training standards for temporary, substitute, and acting staff.</p> <p>Please see the document titled <i>Professional Standards Training Requirements</i> under the “Training Resources” section of our Professional Standards webpage, which defines three separate categories and training requirements. Essentially, if the staff person has duties that involve the following, they are required to have training:</p>

Question	Answer
	<ul style="list-style-type: none"> • Washing dishes. • Serving meals. • Checking students and trays at the point of service. • Cooking the food. • Managing the program. <p>USDA also gives the DPI the option to extend the trainings standards to volunteers who participate in one or more of these activities:</p> <ul style="list-style-type: none"> • Washing dishes. • Serving meals. • Checking students and trays at the point of service. • Cooking the food. • Managing the program. <p>DPI has elected to require volunteers to get the appropriate training as well.</p> <p>For the staff who do not have any of the duties listed above, it is recommended that they receive the annual civil rights training and any job specific training to ensure they can perform their job appropriately.</p> <p>The SNT will be checking for compliance with this requirement during an Administrative Review.</p>
<p>7. What about student workers? Are they required to have 4 hours of professional standards training?</p>	<p>Student workers have been placed in Tier 3 on our <i>Professional Standards Training Requirements</i> document. It would be difficult to require 4 hours of training for each student worker as sometimes they rotate each day (or week in some situations). However, they should have civil rights training and need the basic training for their duties. A suggestion would be to have student workers complete a food safety sheet and sign the employee reporting agreement (which states when they needed to call in for health reasons).</p>

Additional Resources

The USDA published a *Guide to Professional Standards for School Nutrition Programs* in January 2016. You may find this resource and other tools on our [Professional Standards](#) webpage.