Designing your Employee Training Plan

A Course for School Nutrition Directors



PARTICIPANT'S WORKBOOK • 4 HOURS

3400 Human Resources and Staff Training

3430 Develop employee training plans, including a plan for tracking training.

REVISED JULY 2019

Designing Your Employee Training Plan

A Course for School Nutrition Directors

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INTRODUCTION



THIS TRAINING RESOURCE

This training resource is designed as a comprehensive planning tool with the dual purpose of detailing the regulatory requirements of Professional Standards as well as designing your employee's training plans- aligning your staff to receive the most effective training for their job requirements. The appendices in this workbook include reproducible handouts for tracking hiring and training. You may use these forms with your employees, as well as administrators, to ensure Professional Standards regulations are met and documented.

WHAT ARE THE PROFESSIONAL STANDARDS?

Generally speaking, comprehensive training in a school nutrition program is critical to whether or not the program succeeds in meeting the administrative compliance and the nutritional needs of the children. The Healthy, Hunger-Free Kids Act of 2010 aims to institute minimum hiring standards for new State and local school nutrition directors and establish annual training standards for all school nutrition professionals. These new standards will ensure school nutrition personnel have the knowledge, training and tools they need to plan, prepare and purchase healthy products to create nutritious, safe, and enjoyable school meals.

INTRODUCTION

WHO DOES PROFESSIONAL STANDARDS APPLY TO?

Professional Standards apply to all school nutrition employees in the National School Lunch and School Breakfast Programs, whether the Local Education Agency (LEA) operates the school nutrition program or contracts with a food service management company.

USDA has created *job categories* to encompass the diverse job titles LEAs provide to their school nutrition employees. The job categories (Director, Manager, Staff) are general enough to cover most school nutrition program employees and will ensure LEAs are able to identify which of the Professional Standards requirements are required for each of their employees. Job categories are determined by an employee's *job duty* rather than their job title. Job categories are defined below.

DIRECTOR

Directors are the individuals responsible for the operation of school nutrition programs for all schools under the LEA. This is the individual who plans, administers, implements, monitors, and evaluates all aspects of the school nutrition program. Duties generally include: sanitation, food safety, employee safety, nutrition and menu planning, food production, facility layout and design, equipment selection, procurement, financial management, record keeping, program accountability, marketing, customer service, nutrition education, general management, personnel management and computer technology.

- Hiring standards and annual training standards.

MANAGER

Managers have direct responsibility for managing the day-to-day food service operations at one or more sites at the LEA.

- Annual training standards.

OTHER STAFF

A staff person (full-time and part-time) involved in the operation of food service, (i.e. prepare and serve meals, process transactions at point of service, and review the free/reduced price applications, along with other routine work). Typically, staff do not have management responsibilities.

- Annual training standards.

NON-PROGRAM STAFF

A person who provides support to, but is not specifically involved in, the operation of the school nutrition program, such as the cleaning custodian.

- Non-program staff members that work part-time on school nutrition program activities throughout the school year must also comply with the training requirements.

KEY TERMS

In order to ensure Professional Standards regulations are understood, School Nutrition Program Directors must have knowledge of basic key terms related to the Professional Standards. A list of key terms that will be used in the course is provided. You may want to add to the list during the course.

Associates Degree	A two-year degree comprised of at least 60 college credits.
Allowable and Non-Allowable Training Expenses	Costs associated with training that are allowable or not allowable uses of the non-profit school food service account. Director, manager, and staff training is an allowable use of the non-profit school food service account. College tuition and expenses to help a newly hired director meet hiring requirements are not allowable expenses.
Bachelor's Degree	A four-year degree comprised of at least 120 college credits.
"Back to School" Training	Training on security procedures, building operations, etc. that does not count toward the annual Professional Standards training standards. Only training that fosters proper administration and operation of the school nutrition programs would count toward training standards.
Civil Rights Training	Annual required training for school nutrition program staff that covers the Civil Rights Provision in CFR 210.23(b) of the NSLP regulations, the FNS Instruction 783.2, meal substitutions for medical or other special dietary needs, and issues that limit equal access to school meals. These trainings may contribute towards the annual training standards.
Equivalent Education Experience	Term refers to college credits completed by an individual who does not possess a Bachelor's or Associates degree. For example, to meet the hiring standard of an Associates degree, a person would be expected to have at least 60 college credits, which is generally the number of credits required by a college or university to confer an Associates degree.
FNS (USDA) Training Tracking Tool	A Microsoft Access user-friendly tool designed and maintained by USDA that does not require internet access. This free tool is available to download and will let users record the annual training hours for all school nutrition program directors, managers and staff.
Food Delivery Staff	A person who monitors refrigeration, food temperatures, inventory/delivery sheets, and is expected to complete annual training on topics such as proper handling, delivery and storage of perishable food products to ensure safety of school meals and prevent food waste.
Food Safety Training	Eight hours of food safety training, every 5 years, is required for program directors.
Food Service Management Company (FSMC)	A commercial enterprise or a non-profit organization that acts on behalf of a SFA by managing or directing any aspect of the school meal program(s) and must meet applicable program requirements. The SFA must request documentation from the FSMC to show compliance with the Professional Standards.
Full-Time Employee	An employee that works more 20 or more hours per week.

KEY TERMS

General Education Degree (GED)	"General Education Degree" or "General Education Diploma" is an optional high school equivalency credential for those who do not have a high school diploma.
Healthy, Hunger-Free Kids Act of 2010	Improving child nutrition is the focal point of the Healthy, Hunger-Free Kids Act of 2010. The legislation authorizes funding and sets policy for USDA's core child nutrition programs: the National School Lunch Program, the School Breakfast Program, the Special Supplemental Nutrition Program for Women, Infants and Children (WIC), the Summer Food Service Program, and the Child and Adult Care Food Program. The Healthy, Hunger-Free Kids Act allows USDA, for the first time in over 30 years, opportunity to make real reforms to the school lunch and breakfast programs by improving the critical nutrition and hunger safety net for millions of children.
Institute of Child Nutrition (ICN)	Formerly known as the National Food Service Management Institute (NFSMI), is the only federally funded national center dedicated to applied research, education and training, and technical assistance for child nutrition programs.
Interactive Training	Training relevant to job duties focused on the specific Professional Standard learning objectives for school nutrition programs. These trainings may include conference calls, live or pre-recorded webinars, online courses, in-person trainings, and non-interactive training such as informational articles with a self-administered quiz. Training activities lasting 15 minutes or more may be recorded for Professional Standards compliance.
Job Category	The job categories (Director, Manager, and staff) developed by USDA for school nutrition program staff for the purposes of employees identifying which Professional Standards requirements are required.
Job Description	A list that a person might use for general tasks, or functions, and responsibilities of a position. It may often include to whom the position reports, specifications such as the qualifications or skills needed by the person in the job, and a salary range.
Job Duty	Job responsibilities that are performed by an employee on a daily, weekly, seasonal or yearly basis.
Key Areas	Training categories developed by USDA to better organize training. The four Key Areas of Professional Standards are Nutrition, Operations, Administration and Communications/Marketing. Each key area has several topics and specific training subjects.
Local Education Agency (LEA)	Local Education Agency means a public board of education or other public or private non-profit authority legally constituted within a State having administrative control of schools.
Learning Objectives	Specific objectives/topics defined by USDA for continuing education/training standards for all school nutrition personnel. The learning objectives consist of the four key areas.
Learning Topic Code	The numerical code assigned to learning topics under the key areas of Professional Standards.

KEY TERMS

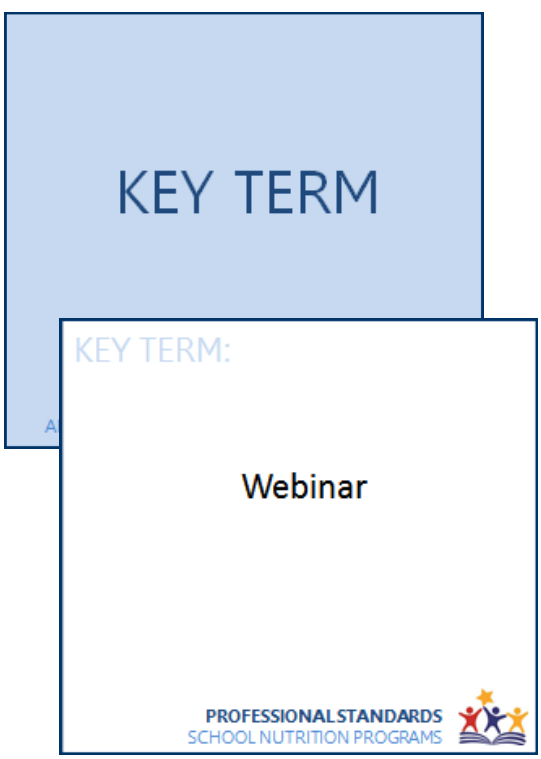
Mid-Year Hire	An employee who is hired later in the school year, typically January 1 or later.
Non-Interactive Training	Miscellaneous activities where information, materials or equipment relative to the core training topics is provided or displayed. These activities may count toward no more than 2 hours of annual training.
Non-Profit School Food Service Account	Non-profit school food service account means the restricted account in which all of the revenue from all food service operations conducted by the school food authority principally for the benefit of school children is retained and used only for the operation or improvement of the non-profit school food service. This account shall include, as appropriate, non-Federal funds used to support paid lunches as provided in §210.14(e), and proceeds from non-program foods as provided in §210.14(f).
Non-Program Staff	A person who provides support to but, is not specifically involved in, the operation of the school nutrition program, such as the cleaning custodian.
Part-Time Employee	In the context of professional standards, means staff working less than 20 hours per week. Part-time staff must have at least 4 hours of training annually. Staff working less than 40 hours weekly may be considered part-time by the LEA. However, staff regularly working 20 hours or more weekly must complete at least 6 hours of training annually.
Related Field	Refers to other college majors that would provide an applicant specific knowledge and skills that are relevant for a school nutrition program director. Possible majors would include but are not limited to food science, community nutrition and marketing and hospitality management.
Relevant School Nutrition Programs Experience	Typically this phrase refers to previous work experience in NSLP and SBP, as well as, experience in other child nutrition programs (CACFP, SFSP) if the later experience is gained from working in a school.
School Food Authority (SFA)	The governing body responsible for the administration of one or more schools and with the legal authority to operate the school nutrition program therein or be otherwise approved to operate this program by FNS.
School Nutrition Association (SNA)	The National body of school nutrition providing information, education, recipes and membership.
School Nutrition Program Director	The individual who plans, administers, implements, monitors, and evaluates all aspects of the school nutrition program. Duties generally include: sanitation, food safety, employee safety, nutrition and menu planning, food production, facility layout and design, equipment selection, procurement, financial management, record keeping, program accountability, marketing, customer service, nutrition education, general management, personnel management and computer technology.
School Nutrition Program Manager	Individuals directly responsible for the management of the day-to-day operations of school food service for a participating school(s).

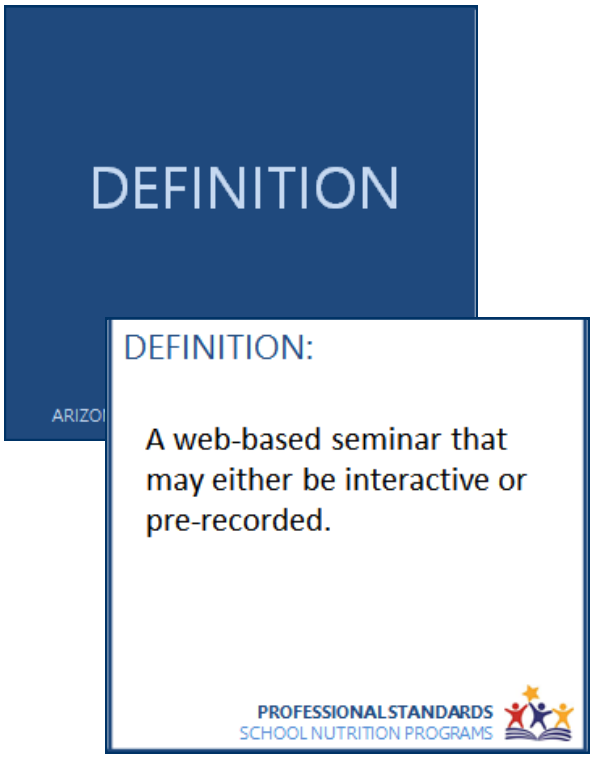
KEY TERMS

School Nutrition Program Staff	Individuals, without managerial responsibilities, involved in day-to-day operations of school food service for a participating school(s).
Temporary/Substitute or Acting Staff	Generally, the terms apply to employees who are only involved with the meal programs and are expected to work in these positions for more than 30 business days. Training standards can be extended to acting/temporary personnel, substitutes and volunteers by the discretion of the SFA.
Training Topics	Program subject matter within each key area. For example, under the key area of Nutrition, training topics include menu planning, nutrition education and general nutrition.
Vended Meal Provider	A commercial entity off site from the school food service that provides pre-plated meals, i.e. a caterer.
Volunteers	An individual performing school nutrition program duties without compensation between 0-40+ hours per week. Training standards can be extended to volunteers by the discretion of the SFA.
Webinar	A web-based seminar that may either be interactive or pre-recorded.

CLASS OPENER ACTIVITY: KEY TERMS MATCH UP

Instructions: Each table has a group of cards that contain either a key term or a definition. Please work in your groups to match the each key term with its definition. Once all key terms have been matched with their definition, please stand up.





CHAPTER 1: HIRING STANDARDS

INTRODUCTION

Local Education Agencies (LEAs) must ensure that all school nutrition program directors hired on or after July 1, 2015 meet the Professional Standards hiring requirements; hiring education standards as well as the required training hours in food safety. These hiring standards are dependent on the enrollment of the LEA and are divided into three LEA size categories: fewer than 2,500 students, 2,500-9,999 students and 10,000 or more students. USDA recognizes that increased LEA size requires increased responsibility and complexity. Additionally, the Director, regardless of LEA size, must have either completed at least eight hours of food safety training prior to their starting date or completed within 30 days of their start date.

In order to be in compliance, LEAs must retain documentation for their newly hired Directors that support their education and work experience (i.e. transcripts, resumes etc.), and food safety training. This section will introduce the Arizona Department of Education (ADE) New Director Hiring Form that all LEAs are encouraged to use to ensure all documentation has been reviewed, copied and kept on file.



CHAPTER 1: HIRING STANDARDS

I. EDUCATION STANDARDS FOR SCHOOL NUTRITION DIRECTORS

Student Enrollment 2,499 or less	**Student Enrollment 2,500-9,999**	**Student Enrollment 10,000 or more**
Bachelor's degree, or equivalent educational experience, with academic major in specific areas; OR ~~Bachelor's degree in any academic major, and State-recognized certificate for school nutrition directors;~~ OR Associates degree or equivalent educational experience, with academic major in specific areas, and at least one year of relevant food service experience; OR High school diploma (or GED) and at least three years of relevant food service experience; (LEAs with less than 500 students: State agency may approve a candidate that meets the educational standards but has less than three years experience.)	Bachelor's degree, or equivalent educational experience, with academic major in specific areas; OR ~~Bachelor's degree in any academic major, and State-recognized certificate for school nutrition directors;~~ OR Bachelor's degree in any academic major and at least two years of relevant school nutrition programs experience; OR Associates degree or equivalent educational experience, with academic major in specific areas,* and at least two years of relevant school nutrition programs experience.	Bachelor's degree, or equivalent educational experience, with academic major in specific areas; OR ~~Bachelor's degree in any academic major, and State-recognized certificate for school nutrition directors;~~ OR Bachelor's degree in any academic major and at least five years experience in management of school nutrition programs.

- **Equivalent education experience:** Term refers to college credits completed by an individual who does not possess a Bachelor's or Associates degree. For example, a new director of school nutrition programs would be expected to have at least 60 college credits which is generally the number of credits required by a college or university to confer an Associates degree. (Bachelor's degree is generally at least 120 college credits.)
- **Specific majors/area of concentration:** Refers to other college majors that would provide an applicant specific knowledge and skills that are relevant for a school nutrition program director. Possible majors would include but are not limited to food science, community nutrition and marketing and hospitality management.
- **State-recognized certificate for school nutrition directors:** Not applicable in the state of Arizona.

CHAPTER 1: HIRING STANDARDS

II. FOOD SAFETY TRAINING REQUIREMENT

Food safety is a critical aspect of the Food Service operation that could affect thousands of students if there are any problems. At least eight hours of food safety training is required every five years prior to the Director's starting date or completed within 30 days of the their start date. As best practice, all School Nutrition Directors, regardless of hire date, should comply with the requirement of eight hours of food safety training every five years.

III. DIRECTORS HIRED BEFORE JULY 1, 2015

The Professional Standards regulation states that current (hired prior to July 1, 2015) School Nutrition Program Directors will be grandfathered in, and thus, will not be required to meet the new hiring standards and may continue to serve in their current positions.

Directors hired prior to July 1, 2015:

- Can remain in their current positions without meeting the hiring standards.
- May fill a new Director position for the same LEA enrollment category or smaller without meeting the hiring standards. For example, a move from an LEA with 4,000 students (the 2,500–9,999 category) to an LEA with 7,000 students (the 2,500–9,999 category).
- Must meet the hiring standards for the larger LEA enrollment category when applying for a director position within that larger enrollment category. For example, to move from an LEA with 4,000 students (the 2,500–9,999 category) to an LEA with 12,000 students (the 10,000 or more category), a grandfathered Program Director must meet the hiring standards established for the larger LEA.

IV. JOB TITLE VS. JOB CATEGORY OF A SCHOOL NUTRITION DIRECTOR

USDA has created general job categories to encompass the diverse job titles provided by LEAs to school nutrition employees. Each employee must be assigned a job category determined by their job duties rather than their job title.

School Nutrition Program Directors are the individuals responsible for the operation of school nutrition programs for all schools under the local educational agency (LEA).

It is not necessary for current staff persons without the job title of Director that perform the role of the school nutrition director to change their job title, but it is required that the LEA recognize that the staff member is performing Director duties and would be assigned the USDA job category of Director and must comply with Professional Standards. For example, if the school is hiring for a food service coordinator yet the job duties align with the category of School Nutrition Director, it is not necessary to have "director" in the job title. For purposes of Professional Standards, the school must recognize this position is fulfilling the category of the School Nutrition Director and therefore must comply with the Director hiring requirements.

CHAPTER 1: HIRING STANDARDS

ACTIVITY #1: DID I GET THE JOB?



Instructions: Each of you will receive a card marked "YES" on one side and "NO" on the other. The trainers will read aloud scenarios of School Nutrition Director job candidates for districts with varied enrollment. After each scenario, you will be asked to hold up your card showing "YES" if the candidate meets or "NO" if the candidate does not meet the Professional Standard Education Standards for School Nutrition Directors.

Scenario 1:

I have a Bachelor's degree in Basket Weaving and have worked the salad bar line in a school cafeteria for 12 years. The school I am applying to has 12,000 students enrolled. Do I meet the qualifications?

Scenario 2:

I have an Associates degree in Hospitality Management and have managed a school site in a district of 10,000+ students for the past 2 years. The school I am applying to has 6,000 students enrolled. Do I meet the qualifications?

Scenario 3:

I have 40 college credit hours and have worked as an interim School Nutrition Director for the past 3 months. Previously, I was a front office attendance clerk in the same district of 500 students for 8 years. I am applying to a neighboring district that has 2,000 students enrolled. Do I meet the qualifications?

Scenario 4:

I have an Associates degree in Food Service Management and was a School Nutrition Programs Director for 2 years (2013-2015) at a district with 16,000 students. The district I am applying to has 11,000 students enrolled. Do I meet the qualifications?

Scenario 5:

I have a high school diploma and waitressed for 10 years. The district I am applying to has 120 students enrolled. Do I meet the qualifications?

Scenario 6:

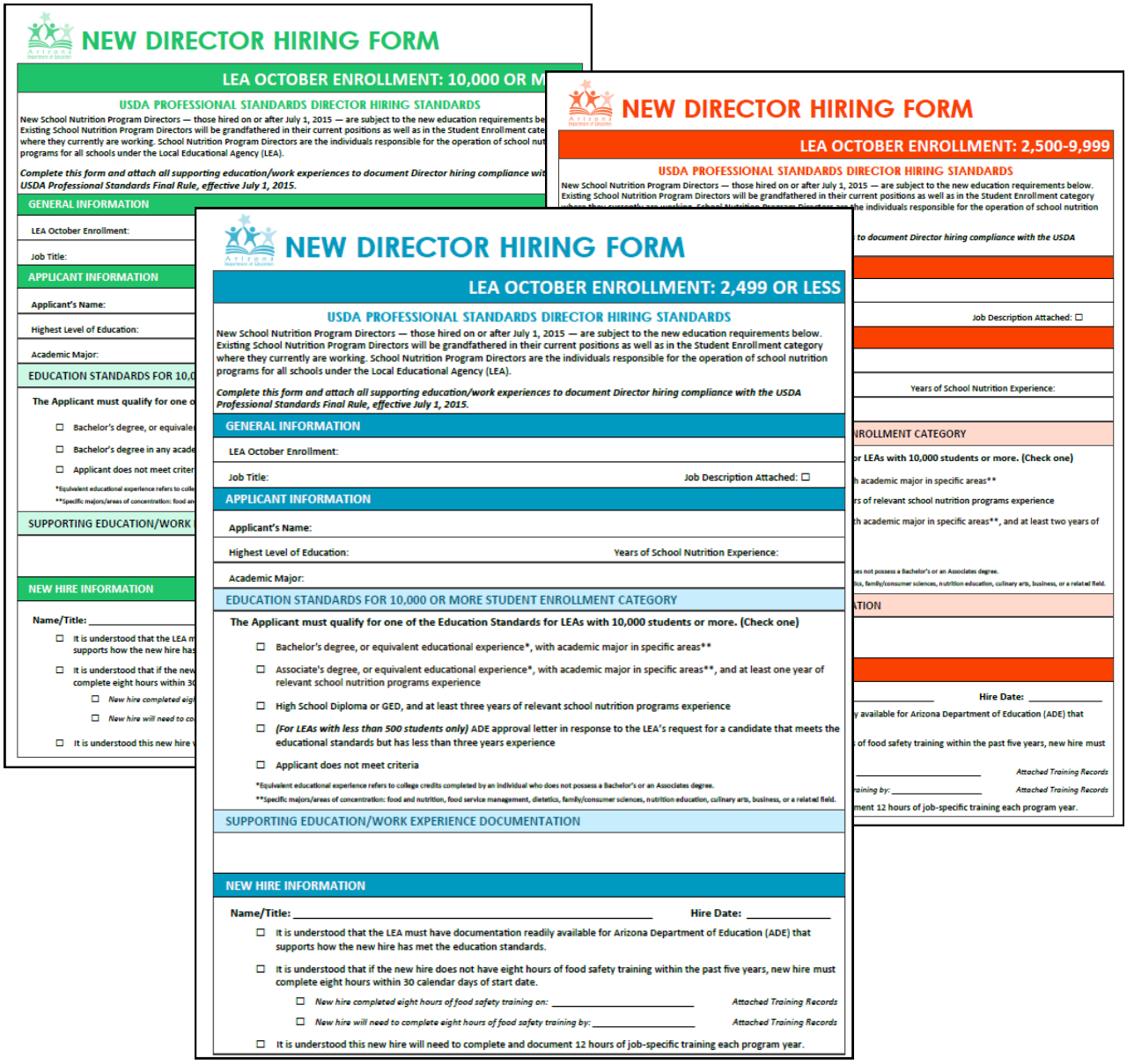
I have 200 college credit hours under an academic major in Nutrition Education and have 4 hours in food safety training. The district I am applying to has 20,000 students. Do I meet the qualifications?

CHAPTER 1: HIRING STANDARDS

V. HIRING SUPPORTING DOCUMENTATION

All School Nutrition Program Directors hired on or after July 1, 2015, must present supporting documentation verifying minimum education standards and food safety training requirements have been met. The LEA must keep this documentation on file at all times to validate compliance.

The ADE New Director Hiring Forms, located in this workbook appendix, are specific to district size. The form will outline the applicants job title, hire date, food safety certification, education standards and previous experience. As best practice, LEAs should use this form to ensure all hiring standards have been met. This form can be filed with the applicant's hiring packet (i.e. resume, transcripts, etc.) and can be used to demonstrate compliance with the hiring standards.



NEW DIRECTOR HIRING FORM

LEA OCTOBER ENROLLMENT: 10,000 OR M

USDA PROFESSIONAL STANDARDS DIRECTOR HIRING STANDARDS

New School Nutrition Program Directors — those hired on or after July 1, 2015 — are subject to the new education requirements be
Existing School Nutrition Program Directors will be grandfathered in their current positions as well as in the Student Enrollment cate
where they currently are working. School Nutrition Program Directors are the individuals responsible for the operation of school nut
programs for all schools under the Local Educational Agency (LEA).

*Complete this form and attach all supporting education/work experiences to document Director hiring compliance wit
USDA Professional Standards Final Rule, effective July 1, 2015.*

GENERAL INFORMATION

LEA October Enrollment:

Job Title:

APPLICANT INFORMATION

Applicant's Name:

Highest Level of Education:

Academic Major:

EDUCATION STANDARDS FOR 10,0

The Applicant must qualify for one o

☐ Bachelor's degree, or equivale

☐ Bachelor's degree in any acade

☐ Applicant does not meet criter

*Equivalent educational experience refers to colle

**Specific majors/areas of concentration: food an

SUPPORTING EDUCATION/WORK

NEW HIRE INFORMATION

Name/Title: _____

☐ It is understood that the LEA m
supports how the new hire has

☐ It is understood that if the new
complete eight hours within 30

☐ *New hire completed eigh*

☐ *New hire will need to co*

☐ It is understood this new hire

NEW DIRECTOR HIRING FORM

LEA OCTOBER ENROLLMENT: 2,500-9,999

USDA PROFESSIONAL STANDARDS DIRECTOR HIRING STANDARDS

New School Nutrition Program Directors — those hired on or after July 1, 2015 — are subject to the new education requirements below.
Existing School Nutrition Program Directors will be grandfathered in their current positions as well as in the Student Enrollment category
where they currently are working. School Nutrition Program Directors are the individuals responsible for the operation of school nutrition

to document Director hiring compliance with the USDA

Job Description Attached: ☐

Years of School Nutrition Experience:

NROLLMENT CATEGORY

or LEAs with 10,000 students or more. (Check one)

h academic major in specific areas**

rs of relevant school nutrition programs experience

h academic major in specific areas**, and at least two years of

es not possess a Bachelor's or an Associates degree.

ics, family/consumer sciences, nutrition education, culinary arts, business, or a related field.

ATION

Hire Date: _____

y available for Arizona Department of Education (ADE) that

of food safety training within the past five years, new hire must

_____ *Attached Training Records*

raining by: _____ *Attached Training Records*

ment 12 hours of job-specific training each program year.

NEW DIRECTOR HIRING FORM

LEA OCTOBER ENROLLMENT: 2,499 OR LESS

USDA PROFESSIONAL STANDARDS DIRECTOR HIRING STANDARDS

New School Nutrition Program Directors — those hired on or after July 1, 2015 — are subject to the new education requirements below.
Existing School Nutrition Program Directors will be grandfathered in their current positions as well as in the Student Enrollment category
where they currently are working. School Nutrition Program Directors are the individuals responsible for the operation of school nutrition
programs for all schools under the Local Educational Agency (LEA).

***Complete this form and attach all supporting education/work experiences to document Director hiring compliance with the USDA
Professional Standards Final Rule, effective July 1, 2015.***

GENERAL INFORMATION

LEA October Enrollment:

Job Title: Job Description Attached: ☐

APPLICANT INFORMATION

Applicant's Name:

Highest Level of Education: Years of School Nutrition Experience:

Academic Major:

EDUCATION STANDARDS FOR 10,000 OR MORE STUDENT ENROLLMENT CATEGORY

The Applicant must qualify for one of the Education Standards for LEAs with 10,000 students or more. (Check one)

☐ Bachelor's degree, or equivalent educational experience*, with academic major in specific areas**

☐ Associate's degree, or equivalent educational experience*, with academic major in specific areas**, and at least one year of relevant school nutrition programs experience

☐ High School Diploma or GED, and at least three years of relevant school nutrition programs experience

☐ ***(For LEAs with less than 500 students only)*** ADE approval letter in response to the LEA's request for a candidate that meets the educational standards but has less than three years experience

☐ Applicant does not meet criteria

*Equivalent educational experience refers to college credits completed by an individual who does not possess a Bachelor's or an Associates degree.

**Specific majors/areas of concentration: food and nutrition, food service management, dietetics, family/consumer sciences, nutrition education, culinary arts, business, or a related field.

SUPPORTING EDUCATION/WORK EXPERIENCE DOCUMENTATION

NEW HIRE INFORMATION

Name/Title: _____ Hire Date: _____

☐ It is understood that the LEA must have documentation readily available for Arizona Department of Education (ADE) that supports how the new hire has met the education standards.

☐ It is understood that if the new hire does not have eight hours of food safety training within the past five years, new hire must complete eight hours within 30 calendar days of start date.

☐ *New hire completed eight hours of food safety training on:* _____ *Attached Training Records*

☐ *New hire will need to complete eight hours of food safety training by:* _____ *Attached Training Records*

☐ It is understood this new hire will need to complete and document 12 hours of job-specific training each program year.

CHAPTER 1: HIRING STANDARDS

VI. REGULATION: QUESTIONS AND ANSWERS

The following are frequently asked questions and answers specific to the hiring standards found within the USDA guidance *SP 38-2016: Questions and Answers 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.*

(4) How are the State and local directors affected by the new hiring standards?

State agency directors of school nutrition programs, State agency directors of distributing agencies, and school food authority (SFA) directors hired on or after July 1, 2015 must meet the hiring standards. Individuals serving in these capacities prior to July 1, 2015, are grandfathered in and may continue to serve in their existing position without having to meet the hiring standards. The hiring standards also apply to food service directors hired on or after July 1, 2015, under a Food Service Management Company contract to operate the NSLP and SBP meal service.

(5) Can someone who does not meet the hiring standards be selected for employment?

No. State agencies and SFAs must select the most qualified individuals that meet the hiring standards. Some flexibility is allowed only for SFAs with less than 500 students, and the State agency may approve the hiring of a school nutrition program director with a high school diploma but less than the required 3 years of experience. See the questions on non-compliance listed under "Oversight."

(6) What are the career advancement/enrichment options for current school nutrition program directors that do not meet the hiring standard established by the final rule?

Individuals serving as program directors in an SFA may remain in their current position, or diversify their experience by applying to a similar position in any local educational agency (LEA) of the same or smaller size category without having to meet the hiring standards for new directors. A current director that wishes to move to a director position at a larger size LEA is required to meet the new hiring standards for that LEA size.

(7) Are sample job descriptions available to help local operators determine who is covered by the professional standards for program directors?

Yes. A sample job description for a program director can be found online at http://www.nfsmi.org/ResourceOverview.aspx?ID=161. According to the Institute of Child Nutrition, the job responsibilities that are performed by a program director on a daily, weekly, seasonal, or yearly basis can be grouped as follows: Facilities and Equipment Management; Financial Management; Food Production and Operation Management; Food Security, Sanitation and Safety; Human Resource Management; Marketing and Communication; Menu and Nutrition Management; Procurement and Inventory Management; Program Management and Accountability; and Technology and Information Systems. Program operators may use these functional areas to determine who is considered a school nutrition program director.

(8) If the school nutrition program director role is shared between multiple people (for example, a business manager, and an administrative assistant and principal), how do the hiring standards for new program directors apply?

The individual who plans, administers, implements, monitors, and evaluates all district-wide aspects of the school nutrition program is generally considered a school nutrition program director. In some SFAs, district-level program responsibilities are divided into several positions. In these instances, only the person hired to perform the majority of the program director duties must meet the hiring standards. Subordinates, such as individuals operating the NSLP afterschool snack service under the supervision of the program director, are not expected to meet the hiring standards but must complete the annual training standards that are appropriate for their positions. Duties of the program director generally include sanitation, food safety, and employee safety; nutrition and menu planning; food production; facility layout and design and equipment selection; procurement; financial management and recordkeeping; program accountability; marketing; customer service; nutrition education, general management; personnel management; and computer technology. See a sample job description for a program director at: http://www.nfsmi.org/ResourceOverview.aspx?ID=161.

(9) If some schools in the LEA do not participate in the school nutrition program, must those schools be considered when determining the hiring standards based on LEA size?

No. The final rule states that the hiring standards are based on LEA size. However, when not all schools in an LEA participate in the school nutrition program the State agency may not have the data from all schools. FNS does not intend to burden the State Agency by requiring it to obtain this information for non-participating schools to determine the LEA size. Therefore, in this situation, the LEA size can be determined using the student enrollment only for the schools that participate in the school nutrition program. If the non-participating schools in the LEA later join the school nutrition program, the LEA student enrollment may be updated at the time when there is new hiring for the program director position.

(10) When assessing the LEA size to identify the appropriate hiring standards, should operators use the October enrollment count?

Yes. The October count should be used to be consistent with other NSLP regulatory provisions.

(11) If a State agency (SA) currently requires food safety certified/licensed staff on site, may the SA waive the requirement that new school nutrition program directors have 8-hours of food safety training?

No. This Federal hiring standard cannot be waived for the new school nutrition program director, regardless of whether the State requires food safety certified/licensed staff on site. To meet the professional standards requirements, program directors hired on or after July 1, 2015, must have this training either within 5 years prior to the starting date or, at the latest, within 30 calendar days of the starting date. In addition, program directors must maintain the food safety certification while employed in the school meal program. Having additional staff on site trained in food safety is encouraged.

(12) What does the term "equivalent educational experience" (in 7 CFR 210.30(b)) mean for purposes of the hiring standards for school nutrition program directors?

This term refers to college credits completed by an individual who does not possess a bachelor's or an associate's degree. According to the Department of Education (http://www2.ed.gov/about/offices/list/ous/international/usnei/us/edlite-structure-us.html), an associate's degree requires completion of an organized program of study of at least 2 but less than 4 years of full-time academic study or more than 60, but less than 120 semester credit hours. A bachelor's degree normally requires at least 4 but not more than 5 years of full-time equivalent college-level work. This includes all bachelor's degrees conferred in a 5-year cooperative (work-study) program. In addition, a cooperative plan provides for alternate class attendance and employment in business, industry, or government; thus, it allows students to combine actual work experience with their college studies. This also includes bachelor's degrees in which the normal 4 years of work are completed in 3 years.

An SFA needs to keep documents, such as college transcripts, that show that the equivalent educational experience of an individual supports the hiring decision. The State agency has the flexibility to determine if other substantial education, such as an extensive training program in school nutrition topics from a professional association with a credentialing and certification program, would count toward "equivalent educational experience."

(13) Under the hiring standards for State and local directors, what is meant by a "related field"?

This refers to other college majors that would provide an applicant specific knowledge and skills that are relevant for a school nutrition program director. Possible majors would include, but are not limited to, Food Science, Community Nutrition and Marketing, and Hospitality Management. Note that colleges and universities may use different names for similar majors. For example, a major may be called Foodservice Management at one university and Hospitality Management at another.

(14) What is "relevant school nutrition programs experience"?

Typically, this phrase refers to previous work experience in the NSLP and SBP, as well as experience in other child nutrition programs (the Child and Adult Care Food Program and/or the Summer Food Service Program) if the latter experience is gained from working in a school. The rationale for hiring actions based on an applicant's work experience must indicate the applicant's familiarity with USDA's school nutrition program. The intent of the professional standards regulations is to ensure that new school nutrition program directors have the knowledge and skills to manage the program as required. At the discretion of the State agency, experience gained from working in a school food service operation outside of USDA's school nutrition program could count. The rationale for hiring decisions must be well-supported and documented.

(15) Has FNS established a process that State agencies must follow to exercise any of the discretionary actions specified in the final rule, such as the option to require that acting school nutrition program directors meet the hiring standards?

No. The State agencies have the flexibility to establish their own procedures for such discretionary actions. The FNS Regional Office is available to help, as needed.

(16) Do the hiring standards apply to employees working under an annual contract?

Yes. To assure proper management and operation of the school nutrition program, new employees working under an annual contract must also meet the hiring standards. However, if an individual is on a year-to-year contract prior to July 1, 2015, and continues to work in the same position in subsequent years, he/she is considered to be "grandfathered" in the position and does not need to meet the hiring standards.

(17) May an SFA use the nonprofit school food service account or the 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. In addition, the school food service funds may not be used to pay for required college education. However, if the State agency and SFA set a Corrective Action Plan (CAP) with a reasonable timeline (i.e., by the next administrative review cycle) for completion of the hiring standards, the LEA's 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 the CAP to meet the hiring standards. Otherwise, using the LEA's general fund or finding alternate ways to pay the salary of a director who does not meet the hiring standards would not support the goal of the professional standards regulations.

Individual circumstances will determine the extent of a reasonable timeline for completing the hiring standards as specified in the CAP. Since this could mean years if an unqualified director has to pursue higher education, the State agency should consult with the FNS Regional Office prior to finalizing a CAP that includes a path and timeline for meeting the hiring standards. The Regional Office, however, is not responsible for approving the CAP.



CHAPTER 2: TRAINING STANDARDS

INTRODUCTION



Each LEA must ensure that all new and current school nutrition program staff meet minimum annual training requirements, with the intent of helping employees enhance their knowledge, skills and abilities particular to their position.

All school nutrition program staff will be identified in each job category and must complete their required minimum number of training hours per year. Keep in mind:

- Trainings must align with the employees job duties.
- Trainings must achieve one of the USDA Learning Objectives (Appendix A).
- USDA suggests at least 15 minutes per training segment.
- Training needs are best assessed by an employee in consultation with his or her manager or director.

I. MINIMUM TRAINING HOURS FOR EACH JOB CATEGORY

All Directors	12 hours minimum of annual continuing education/training. *SY 2015-2016 ONLY-8 hours minimum of annual continuing education/training. **This required education/training is in addition to the food safety training required in the first year of employment.
All Managers	10 hours minimum of annual continuing education/training. *SY 2015-2016 ONLY-6 hours minimum of annual continuing education/training.
Other Program Full-Time Staff	6 hours minimum of annual continuing education/training. *SY 2015-2016 ONLY-4 hours minimum of annual continuing education/training.
Other Program Part-Time Staff	4 hours minimum of annual continuing education/training.
Non-Program Staff	4 hours minimum of annual continuing education/training required only for those non-program staff members that provide support to school nutrition programs THROUGHOUT the school year.

*Mid-year hires (any School Nutrition Employees hired January 1 or later), must complete one-half of the annual training hour requirements for that job category.

CHAPTER 2: TRAINING STANDARDS

II. USDA JOB CATEGORIES OF SCHOOL NUTRITION EMPLOYEES

USDA has created *job categories* to encompass the diverse job titles LEAs provide to their school nutrition employees. Job categories are determined by an employee's *job duty* rather than their job title. Job categories are defined below.

DIRECTOR

Directors are the individuals responsible for the operation of school nutrition programs for all schools under the LEA. This is the individual who plans, administers, implements, monitors, and evaluates all aspects of the school nutrition program. Duties generally include: sanitation, food safety, employee safety, nutrition and menu planning, food production, facility layout and design, equipment selection, procurement, financial management, record keeping, program accountability, marketing, customer service, nutrition education, general management, personnel management and computer technology.

The person performing the majority of these duties must meet the training standards for program directors. If director duties are performed by a staff member without the title of Director, that staff member for purposes of Professional Standards, must be recognized by the LEA as performing Director duties and must comply with Professional Standards.

MANAGER

Managers have direct responsibility for managing the day-to-day food service operations at one or more sites at the LEA.

OTHER STAFF

A staff person involved in the operation of food service, (i.e. prepare and serve meals, process transactions at point of service, and review the free/reduced price applications, along with other routine work). Typically, staff do not have management responsibilities.

- Staff working on program activities for 20 or more hours per week must comply with the full-time training requirements.
- Staff working on program activities less than 20 hours per week must comply with the part-time training requirements.

NON-PROGRAM STAFF

Non-program staff members that work part-time on school nutrition program activities **throughout** the school year must also comply with the part-time training requirements. Non-program staff members that work on school nutrition program activities for a short period of time during the school year are not required to meet the annual training standards; however, these individuals should receive adequate training specific to the task they will perform.

CHAPTER 2: TRAINING STANDARDS

ACTIVITY #2: WHAT ARE MY MINIMUM TRAINING HOURS?



Instructions: Read each position description below. Determine which job category (Director, Manager, Other Program Staff Full-Time, Other Program Staff Part-Time, Non-Program Staff) the employee would fall under and how many annual training hours would be required in the 2016-2017 school year.

Position Description 1:

I am the Business Manager for my district. I am also responsible for school nutrition program personnel management, claiming and menu compliance for the district. My district only has one site and the cook distributes and evaluates income applications and point of service counts. What is my Job Category and how many annual training hours must I complete?

Position Description 2:

My district has 12 schools. I work full time at one of the schools. I run the register for point of service but am responsible for ensuring all employees in my cafeteria are doing their jobs. What is my Job Category and how many annual training hours must I complete?

Position Description 3:

I work full time at my 4 site school district. I work in the district office and my title is Attendance Clerk. About 10 hours per week throughout the school year I process the school nutrition program's applications, including running Direct Certification. What is my Job Category and how many annual training hours must I complete?

Position Description 4:

I teach culinary classes at one of the high schools in my district. During lunch, I stand in the cafeteria and ensure the students are eating and behaving. What is my Job Category and how many annual training hours must I complete?

Position Description 5:

My district has one school where I am employed full time. From 8-12pm Monday through Friday I cook meals for the lunch and breakfast program and from 12:30-3:30pm I drive the busses. What is my Job Category and how many annual training hours must I complete?

Position Description 6:

I work in a district that contracts with 20 charter schools. I run the staffing and financial management for all 20 of the schools and my position title is Food Service Director. My assistant, the Food Service Coordinator, is in charge of monitoring all sites, food production/ordering, menu planning and reporting to ADE. What is my Job Category and how many annual training hours must I complete?

CHAPTER 2: TRAINING STANDARDS

ACTIVITY #3: CATEGORIZE YOUR EMPLOYEES



Instructions: In Column A, make a list of each School Nutrition employee, or non-program employee that provides support to your program. In Column B, list the position title of each employee provided by your organization. In Column C, list each employees duties.

Based on the duties listed, assign each employee a Professional Standards job category (Director, Manager, Full-time staff, Part-time staff or Non-Program staff) in Column D. Once each employee has a designated Professional Standards job category assigned, write in the required number of annual training hours in Column E.

A. Employee Name	B. Position Title	C. Position Duties	D. Job Category based on position duties	E. Number of Required Annual Training Hours

CHAPTER 2: TRAINING STANDARDS

A. Employee Name	B. Position Title	C. Position Duties	D. Job Category based on position duties	E. Number of Required Annual Training Hours

Provide the total number of employees for each the following job categories:

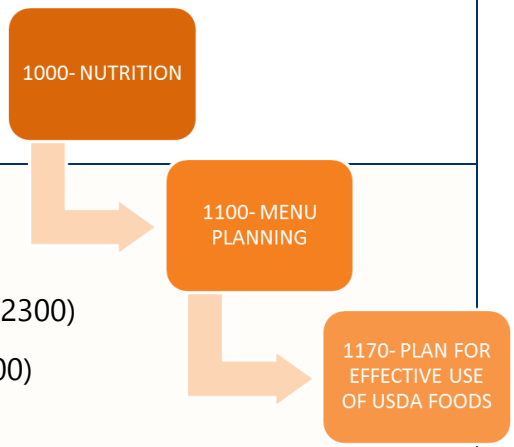
Directors: _____ Managers: _____ Other Staff Full-Time: _____ Other Staff Part-Time: _____ Non-Program Staff: _____

CHAPTER 2: TRAINING STANDARDS

III. KEY AREAS AND LEARNING OBJECTIVES

USDA has organized training topics to fall under four *Key Areas*: Nutrition (1000), Operations (2000), Administration (3000) and Communications/Marketing (4000). Each Key Area has several *Training Topics* (listed below) that contain *Learning Objectives* to assist those who are planning trainings or for attendees to determine which training they should register for. A complete list of Learning Objectives is found in the appendix of this workbook.

Key Areas	**Training Topics**
Nutrition– 1000	Menu Planning (1100) Nutrition Education (1200) General Nutrition (1300)
Operations– 2000	Food Production (2100) Serving Food (2200) Cashier and Point of Service (2300) Purchasing/Procurement (2400) Receiving and Storage (2500) Food Safety and Hazard Analysis and Critical Control Point (HACCP) (2600)
Administration- 3000	Free and Reduced-Price Meal Benefits (3100) Program Management (3200) Financial Management (3300) Human Resources and Staff Training (3400) Facilities and Equipment Planning (3500)
Communications and Marketing- 4000	Communications and Marketing (4100)



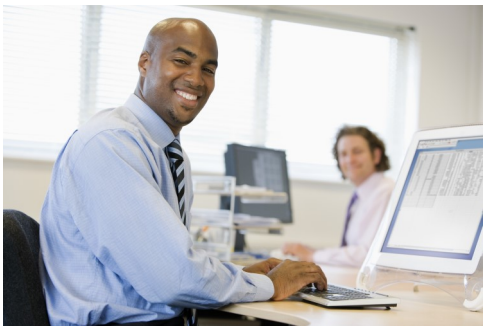
In order for training to count towards the employee's Professional Standards hours, the training attended must reinforce the employee's specific job skills and meet at least one of the 65 Professional Standards learning objectives. Directors should remind their employees to always seek guidance from a supervisor before taking a specific training course to meet the Professional Standards Requirements.

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ACTIVITY #4: WHICH TRAINING SHOULD I COMPLETE?

Instructions: Below, the column on the left lists common School Nutrition Program job titles. The column on the right lists potential trainings. Match up the most appropriate training to each job title by drawing a line to connect the job title with the training.

Cashier	Preparing for Student Eligibility (Professional Standards Code 3110, 3120)
Food Service Director	Culinary Techniques: Preparing Entrée Items (Professional Standards Code 2110)
Kitchen Manager	Reimbursable Meals (Professional Standards Code 2310)
Applications Clerk	Food Production Records (Professional Standards Code 2120)
Special Diets Coordinator	Director's Track: Updates for the SY (Professional Standards Code 3110, 3120)
Lead Cook	CEP Part 1: Making the Most of Community Eligibility Provision (Professional Standards Code 3340)
Business Manager	Managing Food Allergies in School Nutrition (Professional Standards Code 1160, 2210)







CHAPTER 2: TRAINING STANDARDS

IV. TYPES OF INSTRUCTION

Instruction	Restrictions	Minimum Length of Training Segment
Interactive Activity		
Conference Calls		15 minutes
Live or Pre-recorded Webinars		15 minutes
Online Classes		15 minutes
In Person Trainings		15 minutes
Classroom		15 minutes
Self-directed Training with a self-administered Quiz		15 minutes
Non-Interactive Activity	May count toward no more than two hours of annual training.	
Self-directed Training without a self-administered quiz		15 minutes
Observing a Product Food Demo/Industry Exhibit		15 minutes
Instruction that does not count towards training standards		
Back to school training on security procedures, building operations, etc.	Does not fulfill the requirements. Only training that fosters proper administration and operation of the school nutrition programs.	
School Nutrition Association Leadership	Does not fulfill the requirements.	
Motivational Speaker	Does not fulfill the requirements.	

*All School Nutrition Program employees are required to complete Civil Rights Training regardless of job duties. This training will contribute toward annual training hours.

*For all LEAs that operate Offer vs. Serve (OVS) , OVS training will count toward annual training hours.

CHAPTER 2: TRAINING STANDARDS

V. TRAINING RESOURCES: WHERE TO FIND TRAINING

Here is a list of the many choices of free or low-cost training resources. Some training costs may not be an allowable expense from the non-profit school food service account. Check with ADE if you have any questions about specific trainings you want to fund through your program.

- USDA FOOD AND NUTRITION SERVICE (FNS): The USDA FNS online library of available trainings is updated regularly. You can search by key areas, topics, type of training, and more. http://professionalstandards.nal.usda.gov
- INSTITUTE OF CHILD NUTRITION (ICN): The ICN offers free training, both online and in person. You can also download and use its resources for in-service training. http://www.theicn.org
    - A listing of ICN online courses are found in the Appendix of this workbook.
- ARIZONA DEPARTMENT OF EDUCATION (ADE) SCHOOL NUTRITION PROGRAMS: ADE trainings offer a variety of Learning Topics that fulfill the USDA Professional Standards Rule. These trainings are given in multiple formats and can be found/registered for at: http://www.azed.gov/health-nutrition/nslp/training/
    - A listing of ADE's in person and online courses are found in the Appendix of this workbook.
- PROFESSIONAL ORGANIZATIONS: Professional organizations are another option for training. Attend local chapter activities and, when possible, participate in State or national meetings.
- LOCAL IN-SERVICE TRAINING: Rely on experts within your own district or community. For example, invite district experts to provide 15-minute mini-lessons on various topics each month as part of staff meetings. Or, organize a special training session with an outside speaker, such a local Registered Dietitian/Nutritionist (RD/RDN) or your kitchen equipment representative.
- FOODSERVICE SUPPLIERS: Check out training sessions sponsored by companies and trade groups. See if events offered by manufacturers, distributors, and brokers or commodity-promotion groups meet your training needs.
- EXHIBITS AT CONFERENCES: At the discretion of ADE, attending exhibits may count up to 2 hours of exhibits toward annual training time as long as they are relevant to core training topics. The Frequently Asked Questions (FAQ) located at http://www.fns.usda.gov/sites/default/files/cn/ps_faqs.pdf provide more detail on how to acquire training hours through exhibits.
- OTHER RESOURCES: Universities and community colleges are other training options. College courses can count when the course meets job-specific needs. Also, Cooperative Extension or non-profit groups within Arizona or your community may offer related training programs.

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ACTIVITY #5: WHICH TRAININGS?

Instructions: In the tables below fill in at least one training and corresponding topic code for each Professional Standards job category that would apply to your LEA. Refer the appendix for a complete list of learning objectives, ADE trainings and ICN online courses.



Director	Manager

Other Full-Time Staff	Other Part-Time Staff	Non-Program Staff

CHAPTER 2: TRAINING STANDARDS

VI. REGULATION: QUESTIONS AND ANSWERS

The following are frequently asked questions and answers specific to the hiring standards found within the USDA guidance *SP 38-2016: Questions and Answers 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.*

(18) What are the required annual training hours for various school nutrition program personnel?

State agencies: State agency directors (School Nutrition and Distributing Agencies) must complete 15 hours of annual training. Staff in both State agencies must receive annual training, but no specific training hours are established.

SFAs: Beginning in SY 2016-2017, the required annual training hours for SFA personnel are:

- Program directors - 12 hours
- Program managers - 10 hours
- Program staff - 6 hours
- Part-time staff (< 20 hours per week) - 4 hours

Training offered by a State agency director, or by an SFA director or manager to program staff may count toward part of his/her own annual training. If multiple identical training sessions are offered on the same topic, only the time spent on one of the training sessions per topic may count towards the annual training hours.

USDA's Guide to Professional Standards for School Nutrition Programs includes various training scenarios for each job category (directors, managers, staff) and how the training requirements can be met. This Guide to Professional Standards is an easy-to-use booklet designed to help State agencies, SFAs, and school nutrition professionals understand and apply the final rule on professional standards. See http://www.fns.usda.gov/guide-professional-standards-school-nutrition-programs.

Training offered by an SFA director or manager to program staff may count toward part of his/her own annual training.

(19) May training taken between April 1 and June 30 count toward the current or next school year?

At the discretion of the State agency, completion of training may occur over a period of two school years. This flexibility is helpful for employees that take most of their training at the end of a school year. Documentation of this allowance should be kept on file as supporting documentation for the both the Administrative Review and Management Evaluation processes. Training completed each year may only be counted once, for one year, and not for both the current and next school years.

(20) Must the 8-hours of food safety training required for new program directors every five years to maintain food safety certification count toward the 12 hours of required annual training?

Yes. Classes and activities required for new directors to maintain the food safety certification may be included in the director's annual training hours – except in the first year of employment, when having food safety training is required as part of the hiring standards. The annual training, however, is intended as an opportunity to broaden the director's knowledge and skills on different aspects of the program operations.

(21) May program managers and staff take food safety training annually and count it toward their required training hours?

Yes. Grandfathered program directors, and all managers and staff may choose to take food safety training every year and count it toward the annual training standards.

(22) What forms of annual training may the State agencies provide to meet the 18-hours of training annually?

The State agencies may offer SFA training in a variety of ways. Training activities may include conference calls, live or prerecorded webinars, online classes and in-person training. Although FNS encourages interactive training, we recognize that it is not always possible or practical. Therefore, State agencies have the flexibility to offer self-directed training involving information articles with a self-administered quiz.

The State agency director or the State agency staff may offer training. In addition, the State agency may seek assistance from universities, professional associations, industry groups, other advocates, and vendors to provide annual training. The regulation does not specify minimum training duration. Training activities lasting 15 minutes or more may be recorded using the FNS Training Tracking Tool. FNS understands that it takes at least 15 minutes to reasonably cover the training topics and learning objectives listed in the professional standards web page http://healthymeals.nal.usda.gov/hsmrs/ProfStandards/pslearningobjectives.pdf.

FNS is facilitating the exchange of training resources and opportunities among State agencies. Training resources developed by the Institute of Child Nutrition, School Nutrition Association, State agencies, and others are listed in the Professional Standards Training Database at http://professionalstandards.nal.usda.gov/. Training webinars and other resources available from FNS may also be incorporated into the training program for SA and SFA personnel.

(23) May the SFA and school nutrition employees select any training topic they want?

Annual training must 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 topics and learning objectives available at:
http://www.fns.usda.gov/sites/default/files/cn/ps_learningtopics.pdf and
http://www.fns.usda.gov/sites/default/files/cn/ps_learningobjectives.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 the State agency. Employees should always seek guidance from a supervisor before taking a specific training course to meet the professional standards requirements.

(24) If a person serves both as State director of school nutrition programs and as State director of distributing agencies, how many hours of annual training must the person complete?

A director of both school nutrition and food distribution will only be required to complete 15 hours of annual training. Training hour requirements do not double when a person is responsible for more than one program area. Both positions require training in similar areas, such as nutrition, operations, administration, and communications and marketing.

(25) 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.

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. Depending on the size of the school nutrition operation, these program responsibilities may be divided into one or more positions. Only the person who performs the majority of these duties must meet the training standards for program directors. If duties are split evenly, one person needs to be designated as the program director. In both situations, the person(s) not designated as the director must still meet the training requirements for either managers or staff/part-time staff, as appropriate. This would include subordinates operating the NSLP afterschool snack service under the supervision of the program director. These individuals in the snack service must complete annual training, as appropriate for their positions.

Program director duties generally include: sanitation, food safety, and employee safety; nutrition and menu planning; food production; facility layout and design and equipment selection; procurement; financial management and recordkeeping; program accountability; marketing; customer service; nutrition education, general management; personnel management; and computer technology. See a sample job description for a program director at: http://www.nfsmi.org/ResourceOverview.aspx?ID=161.

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(26) Who has to meet the training standards for program director when the school nutrition program manager carries out the duties of the program director but another individual holds the title of program director?

Job duties and job titles may differ from district to district. If the school nutrition program director duties are performed by the program manager, then both the director and the manager would be responsible for meeting the training standards for the program directors. SFAs should discuss unique situations with the State agency to determine the appropriate course of action.

(27) For SFAs in unique situations, such as those consisting of one site or those with less than 500 students and no designated program director, must the person responsible for the food service operation meet the training standards for a school nutrition program director?

Yes. The training standards for school nutrition program directors are intended to apply to the individual who plans, administers, implements, monitors, and evaluates all aspects of the school nutrition program for an SFA, regardless of the number of sites in the SFA or the LEA student enrollment size. The training standards are intended to ensure that the person responsible for the school nutrition program has the knowledge and skills to manage the program as required.

(28) Do the definitions established in the final rule apply to volunteers serving as school nutrition program managers?

The final rule does not establish professional standards for volunteers but gives the State agency discretion to extend the training standards to volunteers at all levels, including those serving as school nutrition program managers. State agencies must determine, based on the duties of volunteers and other local circumstances, if the volunteers and temporary workers at an SFA should receive annual training.



(29) For purposes of the training standards, what is the difference between a "program manager" and "program staff"?

These titles refer to an individual's role in the management and operation of the school meal programs. A program manager is responsible for the management of the day-to-day food service at a school. A program staff person is involved in the operation of the food service for a participating school but does not have managerial responsibilities, such as planning and supervision. The training standards are job-specific, but staff persons may take training that prepares them to assume managerial duties in the future.

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(30) What staff members need to complete annual training?

The term "school nutrition program staff" refers to individuals without managerial responsibilities who are involved in the day-to-day operations of the school food service for a school participating in the NSLP or SBP. Program staff would generally include individuals such as cooks, cashiers, 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, etc.; and support staff that may have an impact on the safety of school meals. 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, is not required to meet the training standards (even if they are paid using non-profit 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.

(29) Do the professional standards apply to a staff such as a secretary or an office assistant who processes free and reduced-price meal applications during the fall months only?

No. Office staff members that process free and reduced-price meal applications or that provide other support for the school nutrition program for a short period of time during the school year are not required to meet the annual training standards. However, these individual should receive adequate training specific to the task they will perform. This situation is different from office staff working on Program activities 20 hours or more per week throughout the school year; in that situation, staff 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.



(32) Do the professional standards apply to the Wellness Coordinator, the person who oversees the local wellness policy implementation?

If the Wellness Coordinator 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.

(33) Are food delivery employees servicing the school nutrition program required to complete the training standards for staff?

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 would not be required.

(34) What training standards apply to the head cook serving in an SFA with less than 500 enrolled students?

A head cook must complete annual, job-specific training for school nutrition program staff. If this individual also serves as the SFA director, the training requirements for school nutrition program directors as well as the hiring standards for new directors would apply.

(35) What training standards apply to employees working under an annual contract?

The training standards apply to all contract employees that are involved in the management or operation of the school nutrition programs, regardless of the contract duration.

(36) What training standards apply to an Assistant Director of school nutrition programs?

If the duties of the Assistant Director are comparable to those of a program manager, the Assistant Director must at least complete the annual training required for program managers. The program director is in the best position to determine the level of training appropriate for the Assistant Director.

(37) How can I plan my trainings to be sure they meet the established training standards?

Annual training must be relevant to the job duties. To learn about the specific objectives for relevant school nutrition training, 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.

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

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.

CHAPTER 2: TRAINING STANDARDS

(39) Does annual civil rights training provided by the school district count towards the annual training standards?

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.

(40) May excess training hours be applied over multiple school years?

Yes. As stated in the regulation (§210.30(e)), at the discretion of the State agency, excess annual training hours may be carried over to an immediately previous or an immediately subsequent school year. This is intended to help provide flexibility while ensuring that SFA employees receive a reasonable amount of training each school year. Documentation to show completion of training must be available to the State agency for review.

(41) Please clarify the expectations for "temporary," "substitute," and "acting" staff positions and how the individuals in these situations are affected by training standards.

Generally, the terms apply to employees who are only involved with the meal programs for a very limited time. The final rule gives the State agencies the option to extend the training standards to acting and temporary personnel, substitutes, and volunteers. State agencies will need to determine, based on the circumstances at hand, if any of these workers at an SFA should be subject to the annual training standards. A State agency that chooses this option should establish a written policy and procedures to ensure the SFAs comply with the State agency requirements.

(42) Do the training standards apply to the staff of a vended meal provider (e.g., a commercial entity off-site from the school food service that provides pre-plated meals)? If so, who is responsible for tracking the annual training hours of such staff?

No. However, the SFA director must ensure that vendors providing meals for the school nutrition programs have the knowledge and skills to supply safe and nutritious meals that meet the meal patterns and dietary specifications.



(43) Do non-interactive activities such as observing a product demo or visiting an industry exhibit room count towards the training standards?

At the discretion of the State agency, time spent in miscellaneous activities where information, materials or equipment relative to the core training topics is provided or displayed may count toward no more than two hours of annual training. For professional conferences, there is an assumption of oversight of the quality of the information and products being displayed.

We suggest that the SFA document employee participation in such demonstration activities, and the nature and length of the demonstration. State agency reviewers will need to see some documentation to ensure that the developmental activity was completed and that annual training standards were met

(44) Does attendance at a motivational speaker lecture, or participation in a session to discuss program issues or to gather program information from the district count toward the training standards?

A presentation by a motivational speaker does not count toward the training standards. Meetings or sessions that fit under the learning objectives and training topics listed in the professional standards website could count toward the training standards. Time spent on advocacy type discussions does not count as annual training. See:
http://www.fns.usda.gov/sites/default/files/cn/ps_learningtopics.pdf
http://www.fns.usda.gov/sites/default/files/cn/ps_learningobjectives.pdf.





(45) Does the School Nutrition Association (SNA) leadership training, or the educational sessions offered at the SNA annual conference count toward the training standards?

While SNA leadership or advocacy training classes may be valuable, they do not support the school nutrition program operations; therefore, this type of training does not count toward the training standards. Educational sessions offered by SNA or the American Commodity Distribution Association at their national conferences that meet the learning objectives and training topics listed in the professional standards website would generally count toward the annual training standards. See:

http://www.fns.usda.gov/sites/default/files/cn/ps_learningtopics.pdf
http://www.fns.usda.gov/sites/default/files/cn/ps_learningobjectives.pdf.

(46) Do the training standards apply only to employees whose positions are supported by revenue from the non-profit school food service account?

No. The school nutrition program director determines the training standards for the employees based on their job duties in the school nutrition program, regardless of the funds used to support a specific position. The definitions in the final rule for school nutrition program director, manager, and staff do not specify that these positions must be fully or partially supported by school food service funds.

(47) What funds are available to pay for any potential training-related costs?

The State agencies may use State administrative expense funds to pay for the cost of training for the State agency director/staff and to pay the cost of delivering annual training to the SFAs, as required by the final rule. At the SFA level, employee training is an allowable use of the nonprofit school food service funds. State agencies and SFAs are encouraged to access the free or low-cost training resources and opportunities listed online at http://professionalstandards.nal.usda.gov/.

(48) Does training offered repeatedly count toward the required training hours for program directors? (For example: May an SFA director teach two sessions of the same 4-hour workshop to the program staff and count a total of 8 hours toward his/her annual training requirement that year? May the director teach the same workshop the next year and count it again toward the annual training hours for the later school year?)

An SFA director who provides training may count it toward his/her annual training hours. If the director presents the same training class or program multiple times in a school year, this is viewed as one training activity as the identical training sessions are not likely to provide the director multiple opportunities for professional development. In that situation, the director is expected to engage in other training activities to improve his/her ability to manage the school meal programs. However, if each training session offered addresses a different aspect of a single topic, those sessions could be considered different training classes or programs and the director may count each of these toward his/her annual training standards. In addition, refresher training that is offered to staff every school year (e.g., eligibility requirements and food safety) counts toward the annual requirements.

(49) If an SFA director, manager, or staff must attend the same workshop each school year, may they count this activity toward their annual training hours?

Yes. Refresher training that must be completed each school year (e.g., civil rights and food safety) counts toward the training standards. It is likely that new issues and questions arise from year to year, which could make each annual workshop different.

(50) If a school has part-time employees with cognitive disabilities, do they have to complete annual training?

Yes. Staff members, including those with disabilities, who work less than 20 hours per week in day-to-day program operations must complete 4 hours of annual training that is related to their job duties. Training opportunities should be made available to all staff as to not discriminate. Training for an employee with disabilities should be tailored to his/her abilities and duties; exceptions could be considered and approved by the State agency, when appropriate.

(51) How do the training standards apply to substitute staff used on a regular basis throughout the school district?

State agencies have discretion to extend the training requirements to substitute personnel. State agencies may require that substitute staff working throughout the school district on a regular basis complete either 6 hours of annual training (staff working at least 20 hours per week) or 4 hours of annual training (part-time staff working less than 20 hours per week).



CHAPTER 3: TRACKING TRAINING

INTRODUCTION

Each Local Education Agency (LEA) must ensure that all Professional Standards requirements are met each school year. In order to validate compliance with these standards, proper tracking is essential. In Chapter 1, we discussed documentation required for hiring. In this chapter you will learn how to use Arizona Department of Education (ADE) Training Tracker forms to track and evaluate employee training plans. You will also be given comprehensive instruction on completing the USDA Professional Standards Training Tracker Tool.

The Professional Standards regulation does not specify the kind of records that must be kept. Records that list the employee name, position title, employer/school, training title, topic/objectives, training source, dates and total training hours would be appropriate to demonstrate training completion.

Records should be able to support that:

- minimum training hours have been met;
- trainings attended are job specific; and
- only allowable training formats contributed to minimum training hours.

Documentation of Professional Standards training is now part of the Administrative Review, so while it is ideal for individual staff members to keep track of their own training, the LEA must ensure it is available for ADE or auditors to review upon request. Whichever record keeping method used, LEAs must keep training records for five years plus the current school year. For open audits, keep training records for five years or longer as needed for audit resolution.

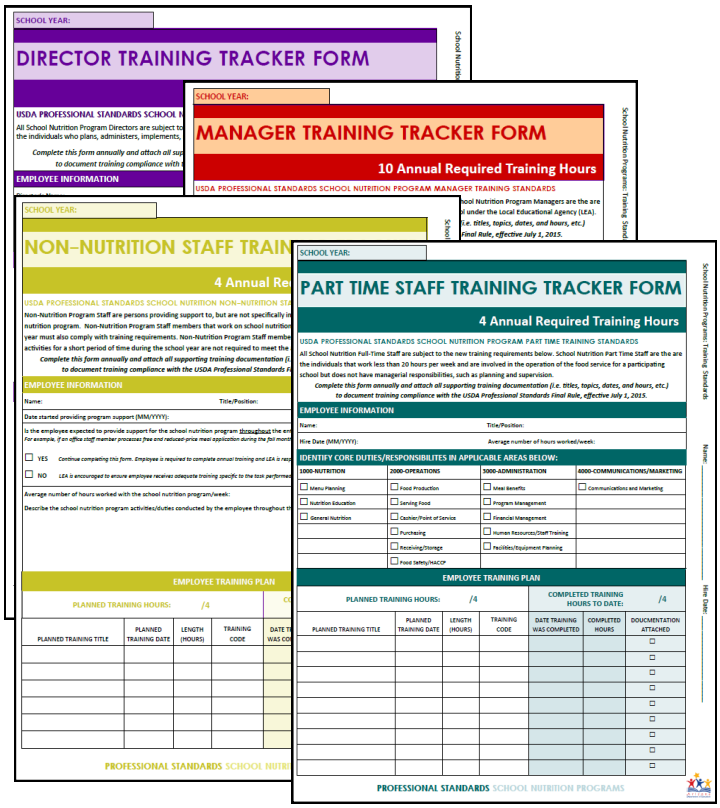


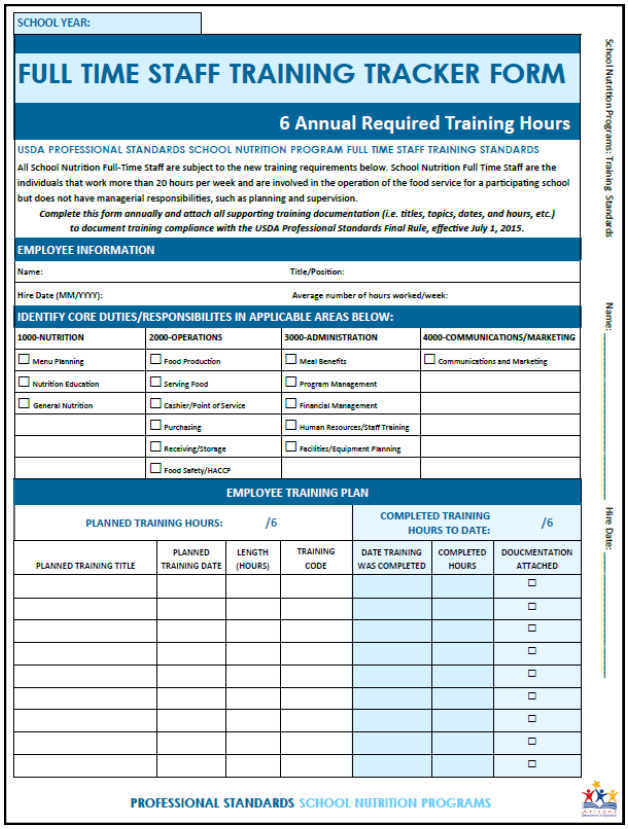
CHAPTER 3: TRACKING TRAINING

I. ADE PROFESSIONAL STANDARDS TRAINING TRACKER FORMS

The following tracker forms were designed to assist School Nutrition Program Directors in documenting that each employee's training plan is aligned with the Professional Standards training requirements.

- Each form is specific to each job category's required annual training hours, as outlined in the Professional Standards regulation. There is a form for directors, managers, full-time staff, part-time staff, and non-nutrition staff.
- Directors are able to record the employee's position duties, training code and the form prompts a training agenda to be attached. By completing these fields, the Director is able to support that trainings attended are job specific.
- Directors can pre-fill training hours and training dates for their employee's training plan. With planning ahead, Directors can use this form to monitor if the training was completed as scheduled and provide reminders for upcoming trainings.
- Once training has been completed, the Director can use the form to shade in the number of training hours completed. This will help identify how many training hours the employee has obtained.
- All forms can be found in the appendix of this workbook.





CHAPTER 3: TRACKING TRAINING

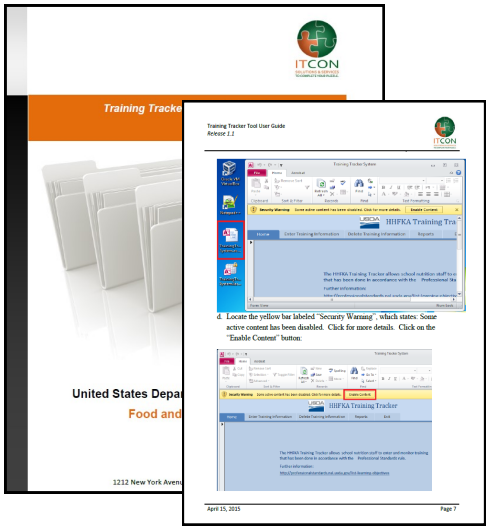
II. USDA TRAINING TRACKER TOOL

The USDA Training Tracker tool can be used to document, record and manage the annual training hours for all School Nutrition Program personnel. The Training Tracker Tool is a stand-alone tool that does not require internet access for use and downloading. It is user friendly and has the capability to run reports, simplifying the annual tracking requirements. Additionally, USDA plans to add enhancements to the tool based on user feedback.

Since trainings should be tracked by Learning Topic Codes for each school nutrition employee, the learning topic codes are already available in the Training Tracker Tool.

USDA TRAINING TRACKER TOOL USER GUIDE

USDA has released a Training Tracker Tool User Guide to guide users through installation, basic use and maintenance of the Training Tracker Tool. The tool is separated into a number of pages and tabs to make entering data easier, and to allow users a comprehensive view of the data whenever necessary.



Sections in the User Guide include:

- Installation
- Training Tracker Tool pages
- Training Tracker How To– Entering Training Information
- Training Tracker How To – Deleting Training Information
- Training Tracker How To - Reports
- Training Tracker How To – Printing & Exporting Reports

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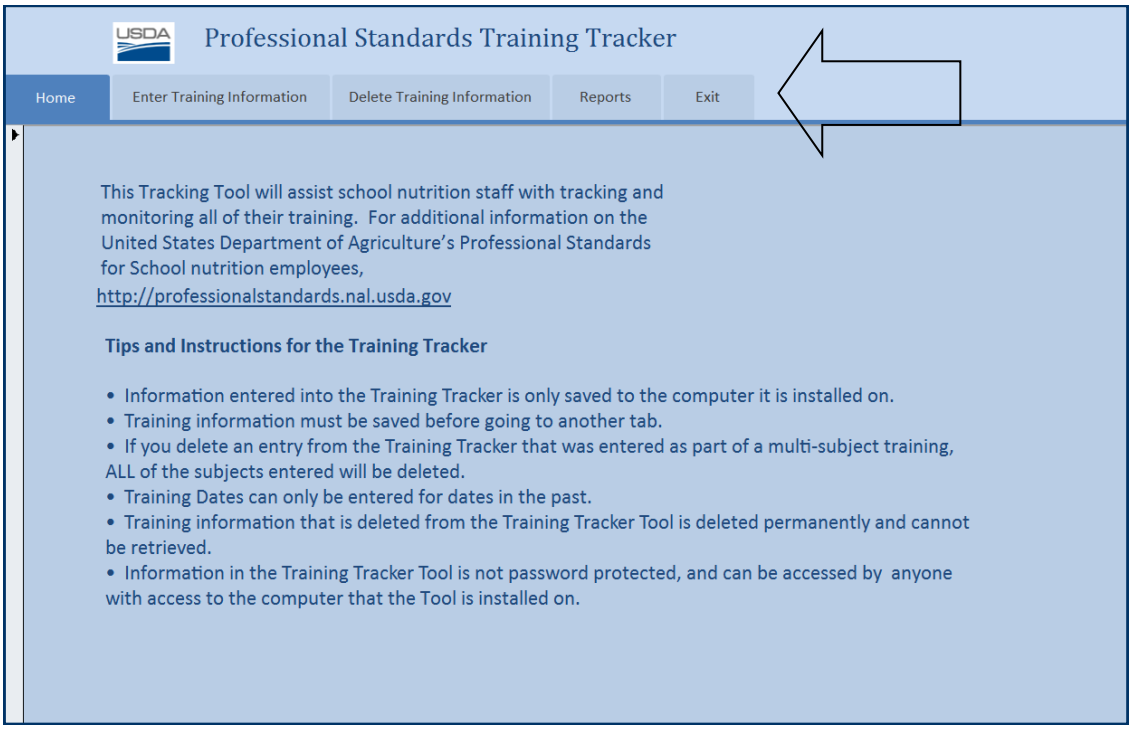
In order to use the Training Tracker Tool, user's computers will need to have the Microsoft Access 2010 software installed. If your computer does not have Microsoft Access, USDA has provided Microsoft Access 2010 Installer on the web page: http://www.fns.usda.gov/school-meals/professional-standards.

Once Microsoft Access has been installed, users can download the Training Tracker Tool from the webpage: http://www.fns.usda.gov/school-meals/professional-standards. A pop-up window will appear from your Web Browser asking you to confirm that you wish to "Open" the file. Click the "Save" button, and click "OK". The Training Tracker Tool will be now be saved to the file location it was saved to and can be opened without the Internet.

CHAPTER 3: TRACKING TRAINING

TABS OF THE USDA TRAINING TRACKER TOOL

The Training Tracker Tool contains multiple tabs located at the top of the screen. We will briefly review each tab. Please click on each tab when instructed. When opening the Training Tracker Tool, users will be on the Tab: Home.



TAB: ENTERING TRAINING INFORMATION

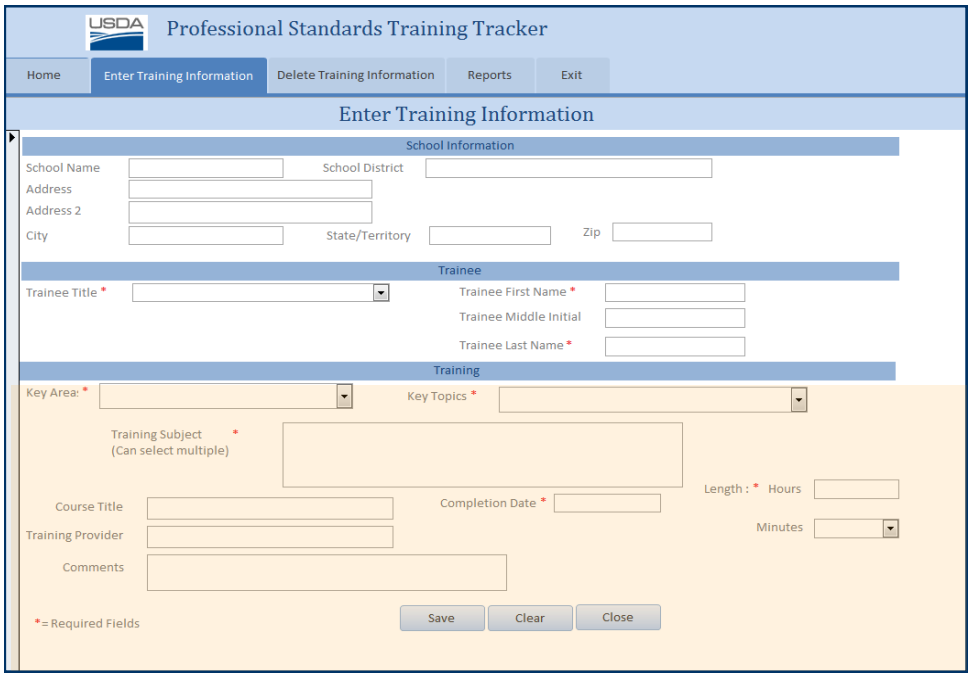
The *Enter Training Information* tab of the Training Tracker Tool is where all training information for a school or school district's employees will be entered.

The *Enter Training Information* tab contains three sections: **School Information, Trainee Information, and Training** (see page 49). Only fields that are marked with a red asterisk (*) are required fields, and must be entered to save a training record.

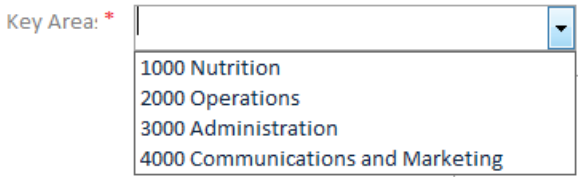
Information that is entered on the *Enter Training Information* page must be "Saved", (by pressing the "Save" button) before navigating to a new page. If the information is not "Saved" it is LOST and will have to be re-entered.

- **School Information Section** should be entered for each entry, and should be determined by the overall supervisor responsible for the Training Tracker Records.
- **Trainee Section** requires the employee's job category to be selected from a drop-down menu. (District Director, manager and other staff) and the trainee's first and last name. .
- **Training Section** requires the user to identify which USDA Professional Standard Learning Objectives the training fulfilled and the length of the training.

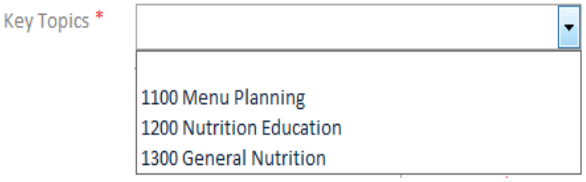
CHAPTER 3: TRACKING TRAINING



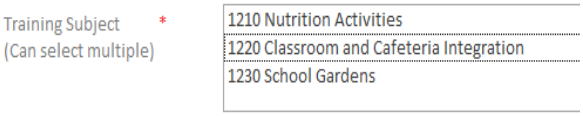
- **Key Area** is a drop-down selection menu that the user will use to select the Key Area representing the training being entered. This field is pre-populated with the four Key Areas: 1000-Nutrition, 2000-Operations, 3000-Administration, 4000-Communications and Marketing.



- **Key Topics** is a drop-down selection menu that the user will use to select the Key Topic representing the training being entered. This field will show different options based on the selection made in the Key Area drop-down menu. For example, if the Key Area selected is 1000-Nutrition, the Key Topics listed will be 1100-Menu Planning, 1200-Nutrition Education, and 1300-General Nutrition.



- **Training Subject** is a multi-select field that the user will use to select the specific Training Subject(s) that represents the training being entered. This field will show different options based on the selection made in the both the Key Area, and Key Topic drop-down menus (Referred to in training as Training Objective). For example, if 1200-Nutrition Education was selected, Training Objectives 1210, 1220 and 1230 will all be listed.



CHAPTER 3: TRACKING TRAINING

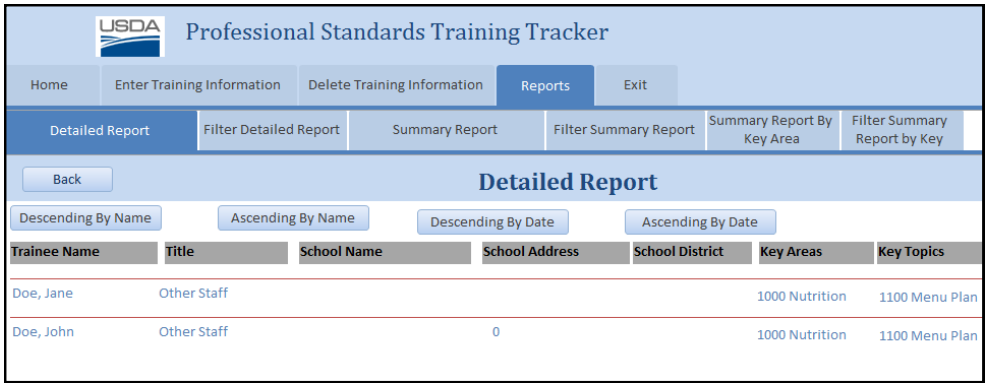
TAB: DELETING TRAINING INFORMATION

Information that has been entered into the Training Tracker Tool can be deleted from the Training Tracker using the *Delete Training Information* tab. To delete information from the Training Tracker Tool, click on the "Delete" button located to the right of the Training Information entry that you wish to delete. This will remove the Training Information entry PERMANENTLY.



TAB: REPORTS

The Training Tracker Tool has three reports that users can use to access the Training Information entries previously entered into the Training Tracker Tool. Each report can be filtered by Training Date, Trainee First Name, Trainee Last Name, and Trainee Title.



Detailed Report shows all information that was entered for each Training Information entry in the Training Tracker Tool. The Detailed Report can be sorted by ascending and descending order by Trainee Name, and the Completion Date.

Summary Report shows the total training hours that each Trainee has accumulated. This report is first grouped by Trainee Name, then sub-grouped by Trainee Title. If an individual's Title changes, they will receive a new entry in the Summary Report. If a Trainee Name is entered incorrectly, it will receive its own entry in the Summary Report.

Summary by Key Area Report shows the Total Training hours, separated by Key Area that each Trainee has accumulated.

CHAPTER 3: TRACKING TRAINING

III. REGULATION: QUESTIONS AND ANSWERS

The following are frequently asked questions and answers specific to the hiring standards found within the USDA guidance *SP 38-2016: Questions and Answers 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.*

(56) What professional standards records must be kept for the Administrative Review?

The Professional Standards regulations do not require specific records or a specific recordkeeping system. According to the Administrative Review Manual, supporting documentation for all completed trainings, such as agendas, sign-in sheets, certificates of completion, etc., must be maintained on file and may be used to demonstrate compliance with the annual training standards. Reports from the USDA downloadable training tracking tool (or similar alternative training tracking tool) also are acceptable documentation to demonstrate compliance. Alternative training tracking tools may be developed by the State agencies and/or SFAs but must include at a minimum the required fields listed in the USDA Professional Standards Training Tracker Tool. These fields would include Key Areas, Key Topics and Training.

To demonstrate compliance with the hiring standards, program directors hired on or after July 1, 2015, must provide documentation showing completion of required education. The SFA must retain appropriate records for a 3-year period. If a State agency requires specific records, the SFA should be made aware of this separate State agency requirement. See the professional standards review module in the Administrative Review Manual for more guidance.

CHAPTER 4: MANAGEMENT COMPANIES

INTRODUCTION

Food Service Management Company (FSMC) is a commercial enterprise or a non-profit organization that acts on behalf of a School Food Authority (SFA) by managing or directing any aspect of the school meal program(s) and must meet applicable program requirements. The LEA must request documentation from the FSMC to show compliance with the Professional Standards.

I. CONTRACTS

In the state of Arizona, when contracting with a FSMC, LEAs must be aware of the rules written into the FSMC contract:

> "The Food Service Director assigned to the SFA if awarded the contract, must meet the minimum education and training standards for School Nutrition Program Directors set forth in Public Law 111-296, Section 306, paragraph (g) (2015). The SFA reserves the right to approve the selection of the FSMC's personnel and to refuse any applicants recommended by the FSMC to which the SFA objects."

Beginning SY 15-16 contracts that do not include additional language to reflect compliance with Professional Standards requirements, will need to be amended.

II. HIRING STANDARDS

There are varying structures within each SFA; therefore, the definitions for directors, managers, and staff are intended to be general and describe the function/role in broad terms to be applicable to most LEAs. These definitions apply whether or not an LEA is operated by a FSMC. Therefore, Director hiring standards apply to FSMC employees performing School Nutrition Director type duties.

III. TRAINING STANDARDS

All Professional Standards training requirements apply to all FSMC employees providing services for the school meals program. The LEA must ensure that the FSMC employees have met the required annual training requirements. Therefore, the LEA must require the FSMC to provide documentation showing the training hours and topics completed by the employees. The LEA must ensure that the FSMC staff has the knowledge and skills to supply safe and nutritious meals that meet the meal requirements.

When a FSMC staff person performs School Nutrition Director type duties, but reports, for example, to a district Business Manager who is responsible for the school district's school food service activities, **both** individuals would be responsible for meeting the training standards for program Directors.

CHAPTER 4: MANAGEMENT COMPANIES

IV. REGULATION: QUESTIONS AND ANSWERS

The following are frequently asked questions and answers specific to the hiring standards found within the USDA guidance *SP 38-2016: Questions and Answers 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.*

(58) Do the training standards apply to employees of a FSMC and who is responsible for providing the training?

Yes. The SFA director must ensure that FSMC employees providing services for the school meal programs have the required annual training. The SFA director may work with the FSMC to identify appropriate training resources and opportunities, such as those listed at the professional standards website at http://professionalstandards.nal.usda.gov/. The SFA must require the FSMC to provide documentation showing the annual training hours and topics completed by the employees. FSMC contracts that do not include language that enables the SFA to comply with the professional standards requirements must be amended to ensure the SFA complies with these requirements. While FNS does not anticipate a material change for most FSMC contracts, if the SFA or FSMC considers this amendment a material change, the contract must be re-solicited with new language to ensure the SFA complies with the professional standards requirements by the next school year.

(59) Who is responsible for tracking FSMC staff training hours?

The FSMC staff must track their annual training hours to be able to demonstrate they have the knowledge and skills to supply safe and nutritious meals. For purposes of the administrative review, the SFA must request documentation from the FSMC to show compliance with the training standards. Contracts that do not include this language may need to be amended to include additional language to reflect compliance with the professional standards requirements. While FNS does not anticipate a material change for most FSMC contracts, if the SFA or FSMC considers this amendment a material change, the contract must be re-solicited with the new language to ensure the SFA complies with the professional standards requirements by the next school year.

(60) 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?

The SFA maintains oversight and responsibility for planning, administering, implementing, monitoring, and evaluating the school meal programs; therefore, the role of program director must remain with the SFA. The SFA-State agency permanent agreement names the individual considered the SFA director or contact. This is the person, or any other designated staff who fulfills those duties, that must meet the hiring standards for new directors. Thus, in some cases, both the SFA contact and FSMC staff person must meet the hiring standards,

depending on the duties of these individuals. With regard to training, both individuals would be responsible for meeting the training standards for program directors as they share director responsibilities. Discuss unique situations with your State agency to seek guidance.

(61) Does the implementation of professional standards in the middle of a contract constitute a material change?

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. While FNS does not anticipate a material change for most FSMC contracts, any areas requiring clarification should be discussed with the FNS Regional Office.

CONCLUSION



The Professional Standards for all school nutrition employees help ensure a capable workforce. Tiered training requirements were developed to match the needs of employees. Hiring standards for new local program directors assist local districts in recruiting and hiring qualified leaders. Both the State agencies and USDA provide support and resources to the SFAs to meet training and hiring standards. Most importantly, Professional Standards help all schools to provide safe, nourishing meals that model and foster wise food choices in children today for a healthier tomorrow.