



**Feeding Bodies. Fueling Minds.™**

May 8, 2018

Ms. Tina Namian, Chief  
School Programs Branch  
Policy and Program Development Division  
USDA Food and Nutrition Service  
3101 Park Center Drive, 12<sup>th</sup> Floor  
Alexandria, VA 22302

Dear Ms. Namian:

These comments are submitted on behalf of the 57,000 members of the School Nutrition Association (SNA) and in response to the U.S. Department of Agriculture's Food and Nutrition Service (FNS) *Hiring Flexibility Under Professional Standards, Proposed Rule*, published in the Federal Register on March 6, 2018. Our membership includes school nutrition professionals serving students in K-12 schools, college level academic instructors/professors in related fields, state agency personnel administering Federal child nutrition programs and other related professionals.

SNA has a long history of advocating for professional standards for those serving in school nutrition programs to support, elevate and enhance the perception of school nutrition professionals. Prior to passage of the Healthy, Hunger-Free Kids Act of 2010, SNA's Keys to Excellence benchmarking program was helping school nutrition professionals improve their skills and their programs through standards of practice and indicators that promote continuous program review, evaluation and improvement. In fact, the four key areas of SNA's Keys to Excellence program became the basis of USDA's Professional Standards. Today, all of SNA's professional development programming, including our Certificate and SNS Credentialing programs, webinars and education sessions at conferences, are aligned with USDA's Professional Standards. SNA is committed to providing school nutrition professionals the opportunities and tools necessary to meet these national standards. School nutrition professionals should have school foodservice experience combined with an academic background and competencies to ensure a firm grasp of the complexities of the child nutrition programs. Preserving these high quality standards is critical to maintaining a high caliber work force.

Overall, SNA supports the current Professional Standards, yet we appreciate the Department's issuance of these flexibilities for small local education agencies (LEAs) where the limited pool of candidates is still working toward the requirements. In these unique cases, the Department should encourage continued training and professional development focused more keenly on

school nutrition program areas. State agencies could assist in offering additional training opportunities that relate to the school nutrition workplace. SNA also supports allowing a bachelor's or master's degree in a relevant field to count toward a State director applicant's educational experience.

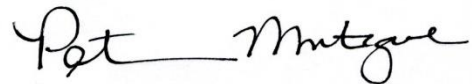
In addition to these flexibilities, SNA also requests that USDA consider the challenges faced by small LEAs or school districts in the process of consolidation. The consolidation of several small districts into one with a larger student enrollment could impact the district's school nutrition Professional Standards requirements. As more small school districts turn to consolidation to manage costs, we hope USDA will grant State agencies leeway to work independently with these districts and ensure a reasonable transition period allowing impacted school nutrition professionals to work toward new requirements.

Thank you for your consideration of these issues and your efforts to ensure school nutrition professionals maintain strong academic credentials and in-depth knowledge of the complex child nutrition programs that support our students' academic success.

Sincerely,



Dr. Lynn Harvey, RDN, LDN, FAND, SNS  
President



Patricia Montague, CAE  
Chief Executive Officer