



April 4, 2014

Julie Brewer, Chief
Policy and Program Development Branch
Child Nutrition Division
Food and Nutrition Service
U.S. Department of Agriculture
P.O. Box 66874
St. Louis, MO 63166

Dear Ms. Brewer:

The School Nutrition Association (SNA), a national non-profit professional organization representing more than 55,000 members who provide high-quality, affordable, nutritious meals to students across the country, is pleased to submit the following comments in response to the Proposed Rule for Professional Standards for State and Local School Nutrition Programs Personnel as Required by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). We commend the Food and Nutrition Service (FNS) for its efforts to define and implement the professional standards objectives of the HHFKA. We are pleased to join with the FNS in endorsing the key goal of improving professional standards for employment and furthering appropriate professional education for personnel of school nutrition agencies.

SNA has surveyed and solicited comments from its school nutrition and state agency members regarding all aspects of the Proposed Rule. This letter provides a summary of the primary findings and policy implications of SNA's research.

Proposed Rule Background: Grandfathering

SNA members endorse the “grandfathering” of the education and training of currently employed personnel as contained in the Proposed Rule.

Minimum Required Annual Continuing Education/Training for School Nutrition Program Directors

SNA members, representing school districts of all sizes, support the proposed minimum education and training standards for school nutrition program directors. SNA members appreciate and endorse the alternative methods built into the Proposed Rule for satisfying minimum education and experience requirements for program directors hired beginning on July 1, 2015. SNA members are concerned that some school districts will not be able to locate and retain personnel with the specified qualifications. School district budgets may not attract persons with even the minimum qualifications in predominantly rural or economically disadvantaged areas. There are limitations on the pools of prospective employees in many areas and a high variability among states as well as districts.



Accordingly, SNA recommends:

Recommendation 1: Allow for school districts unable to secure directors with minimum qualifications the ability to provide documentation demonstrating such, as well as provide a corrective action plan, to be monitored by the state agency.

School Nutrition Program Directors of all LEA Sizes (Food Safety Training)

SNA recognizes the importance of food safety training for all directors and believes that knowledge of food safety is essential to providing healthful and safe school meals and supports training within 30 days of employment.

School Nutrition Program Professional Standards (State Directors)

Regarding state agency minimum education and training standards for employment, SNA members are supportive of the objective of minimum qualifications. SNA thanks USDA for including ongoing training requirements for state directors.

Recommendation 2: SNA would also encourage that all personnel who review, monitor, and provide guidance on school meal programs engage in the same level of continuing education as the state directors.

Use of Funds for Training

SNA believes that training costs should be an allowable expense to the school food service account.

Recommendation 3: SNA believes that state agencies should continue to be encouraged to use State Administrative Expense Funds to provide required training programs for State Agency and School Food Authority employees.

Provision of Annual Training

SNA endorses the concept of continuing education for all staff that are directly involved in school nutrition operations and continues to advocate for flexibility in this area. SNA members are strongly united in advocating that SNA's training programs – both current offerings and future programs developed to support the Proposed Rule – should be approved and endorsed sources of professional training for meeting both the minimum standards as well as the continuing education standards, for both program directors and staff.

Recommendation 4: SNA members advocate that the FNS allow for a wide range of options for continuing education in the final version of the Rule, in order to lessen the financial and administrative burdens of the continuing education requirements.



School Food Authority Oversight

We appreciate the flexibility the Proposed Rule has for ongoing training. We are pleased USDA has utilized SNA's Keys to Excellence Program as a framework for creating the proposed professional standards.

SNA further recommends:

Recommendation 5:

- The Proposed Rule should freely allow informal training, including self-study, conference attendance, one on one peer-provided and other on-the-job training, and other non-classroom options.
- Each local education agency shall be solely responsible for determining which staff job categories fall within the definition of "directly involved in school nutrition operations" and receive the required training, recognizing that many administrative and maintenance support staff do not need such training.
- Any training required by USDA regulation is counted toward the annual training requirement.

SNA sincerely appreciates this opportunity to provide comments and the results of its investigation of the impact of the Proposed Rule upon its members and their school districts. SNA also values its strong and productive working relationship with FNS and USDA as a whole. SNA looks forward to continuing to partner with USDA to ensure school nutrition professionals receive the appropriate credentialing, training programs, and professional education to be successful in their profession.

Sincerely,

Leah Schmidt, SNS
President