

Iowa Professional Standards Clarification for School Nutrition Hiring and Training

USDA has given states discretion in some areas of the new professional standards for hiring directors of School Nutrition Programs and annual training for all School Nutrition Professionals. The purpose of this document is to answer common questions we have received at the Bureau of Nutrition and Health Services and to communicate Iowa decisions where USDA has given discretion regarding the minimum hiring standards for school nutrition directors and minimum annual training for all school nutrition professionals

1. **NO STATE DISCRETION: Who is considered the School Nutrition Director when duties are shared?** USDA has answered that question in its document of frequently asked questions. This designation of director applies to both hiring standards and annual training requirements.

USDA Questions 8 and 25: If the school nutrition program director role is shared between multiple people (for example, a business manager, an administrative assistant, and a 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. 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. **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>.

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.

2. **Who should be considered nutrition staff for purposes of annual training requirements?** USDA also provided some guidance regarding this question. The table on page 3 includes positions for which we have had questions regarding annual training requirements and required documentation.

USDA Question 28: What staff members (other than directors and managers) 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 nonprofit food service account funds). The program director or manager must examine the job duties of program staff to determine what job-specific training they need to perform their jobs effectively and in compliance with program regulations.

USDA Question 43: Do the training standards apply only to employees whose positions are supported by revenue from the nonprofit 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.

3. In the areas where USDA has given state's discretion, the Iowa decisions to date are outlined below.
 - A. **For the very small LEAs (500 or less) that face unique hiring difficulties, Iowa guidance:**
 - If there are no applicants with school food service experience, other food service experience can be considered. The SFA must send the job description outlining the duties of the school nutrition director to the regional consultant assigned to your area or contact the Bureau office at 515-281-5356. The SFA and state agency will develop a program of online modules and/or other training for the newly hired director to complete within one year based on their assigned school nutrition duties.
 - The food safety training requirement in USDA standards must be met. Complete 8 hours within 30 calendar days of hire if not previously completed within 5 years of hire.
 - In the rare instance that no qualified applicant with a high school diploma could be found, the SFA will identify the plan to obtain a GED, preferably within 1 year.
 - B. **Training standards for SFA personnel may be extended to others.** The final rule gives the State Agency discretion to require that acting and temporary staff, substitutes, and volunteers complete training in one or more of the topics listed in the final rule, as applicable, within 30 calendar days of their start date.
Iowa guidance:
 - SFA must have a plan for training adequate to do the job, especially food safety training.
 - We will ask at the AR the plan for training substitutes or volunteers to see that the training provided prepares the individual to do the job tasks in a safe and correct manner.
 - See also the chart on page 3 of this document regarding positions that school may wonder whether they should be included on annual training logs.
 - C. **Carry over "excess" annual training hours** and demonstrate compliance with the training requirements over a period of two school years can be allowed. **Iowa guidance:**
 - School nutrition professionals may carry over "excess" annual training hours over a period of two school years, but some training must be completed each school year. Documentation must be available for Administrative Review.
 - Required annual training, such as Civil Rights, cannot be carried over, but must be completed annually.

Training logs should include:

- Employee's name
- Position as defined in the professional standards (director, manager, staff 20 hours or more weekly, or staff less than 20 hours)
- Title of training
- Training topics/subjects (i.e. key area, key topic, and learning topics/codes)
- Date training completed
- Creditable training hours

The chart on the next page describes various positions for which School Nutrition Program training questions have been asked in Iowa and the answers given based on understanding of USDA written guidance. **Even if the position is considered not to be covered by the minimum professional standards, it is expected that there is a written plan to assure that all positions who provide functions essential to the safe and compliant operation of the USDA School Nutrition Programs have been trained to carry out those duties.** Documentation of training can be orientation checklists, meeting agendas and sign-in sheets, or certificates/other documentation from formal training events

Iowa Clarification of School Nutrition Annual Training Requirements

Position	Description	Documentation Required	Required Topics
Authorized Representative	Individual listed in the application- See decision tree on page 4.	Assurance that all those performing essential functional areas of the school nutrition program are trained	See decision tree on page 4.
School Nutrition Director	Individual listed in application – See explanation of program duties on page 1.	Minimum of 12 hours logged annually	Depends on previous training and experience. A list of resources for training by area of responsibility is available.
Determining Official	Individual listed in the application/responsible for determining income eligibility of participants	4 or 6 hours logged annually dependent on school nutrition hours per week	Civil Rights Income Eligibility including Direct Certification
Verifying Official (may be same as determining official)	Individual listed in the application/responsible for USDA	4 or 6 hours logged annually dependent on school nutrition hours per week	Civil Rights Income Eligibility Verification process and reporting
Confirming Official (must be different than determining official)	Individual listed in the application who checks accuracy of applications prior to verification.	Plan for training dependent on duties	Confidentiality Income Eligibility
Wellness contact	Individual listed in the application as the wellness contact responsible	Plan for training dependent on duties	Civil Rights USDA guidance for developing and implementing wellness policy
Claim preparer	Prepares and submits monthly claims	Plan for training dependent on duties	Reports available from POS Daily edit checks IowaCNP and deadlines
Youth service workers in RCCI	Individuals who oversee all of the personal care activities in a RCCI	4 hours logged if duties include meal preparation, otherwise plan for training dependent on duties	Food Safety Civil Rights Meal patterns and procedures for serving reimbursable meal
Teachers who oversee Breakfast in Classroom	Training requirements depend on duties	Plan for training dependent on duties	Civil Rights Food Safety Identification of reimbursable meal if applicable
Custodians who work in cafeteria	Training requirements depend on duties	Probably NA	Food Safety and Sanitation as appropriate
Drivers of food transport vehicles	Training requirements depend on duties	Plan for training dependent on duties	Food Safety and Sanitation as appropriate
Secretary from outside of food service who only operates the POS	Training requirements depend on duties	4 hours logged if duties include identification of reimbursable meals on a daily basis, otherwise plan for training dependent on duties	Civil Rights Proper operation of POS Identification of reimbursable meal if applicable
Business office staff	Tracks School Nutrition revenue and expenses	Plan for training dependent on duties	Nonprogram food cost reporting USDA Procurement if part of duties
Volunteers	SFA must have a plan for training adequate to do the job, especially food safety training.		

Hiring and Training Standards for Iowa School Food Authorized Representative

The School Food Authorized Representative is an employee of the SFA that is the point of contact for the DE. It is their responsibility to act on information or guidance provided by the DE or to distribute it to the appropriate staff member to act, respond, or implement. This person has signature authority related to matters of the Child Nutrition Program and is the primary contact for: program agreements; audit findings; three month operating balance; second view of application; and memos and updates. This decision tree should help determine hiring and training requirements for this position.

