The questions during the training fell into 4 broad categories.

I. Who Needs Training and How Much?

Many of these questions can be answered by the following two questions from the USDA FAQ issued June 26, 2015.

**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.

**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.

1. What if you have a long term sub say if someone has surgery and will be back in 3 weeks?
   - 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. USDA also indicates in Question 37 of the FAQ that the terms “temporary” “substitute”, and “acting” apply to individuals who are only involved with the meal programs for a short amount of time. In Iowa, we have decided that temporary employees and volunteers need only have adequate training to do the job. If the sub was only involved for the 3 weeks, they would be considered “temporary.” If the sub worked in a different school for another 3 weeks and worked some hours for School Nutrition Programs almost every week, they would be considered a part-time employee under the professional standards and required to have 4 hours training annually.

2. How many hours do Authorized Representatives need that may not work in foodservice?
   - Hours worked per week doing School Nutrition tasks is the deciding factor. If they do School Nutrition tasks less than 20 hours per week, then the required annual hours of training would be four.

3. Does an accountant who writes checks for the program need to have training hours
   - If writing checks is the only function and there is no need for special knowledge of school nutrition fund procedures, then they would not fall under the training requirements. If they have procurement responsibilities for the School Nutrition Programs, that would require training.

4. If the director is thinking of stepping down in a few years, can a nutritional staff that has been working there for 5-6 years be hired in that position?
   - The answer is dependent on the size of the school district. For a district of less than 2400 students, a high school diploma and 3 years of relevant school nutrition experience is one of the choices for credentials of a new director.
5. Question on school meal cashiers — ours are school aides on the education side of staff, and just come help us cashier during lunch. They are trained on OVS to ensure students have a reimbursable meal. Are they required to have a certain number of training hours?
   o Cashiering is one of the duties described as a school nutrition staff task in USDA Question 28 at the beginning of this document. The number of hours of training would depend on the number of hours worked for School Nutrition in a week.

6. Do the TAs who supervise students in the lunch room or the custodial staff who are in the lunch room during the meal time have to have training hours? If they only are in the lunch room for an hour a day, but are working in the school for 8 hours a day, do they need to have 4 hours or 6 hours?
   o See USDA Question 28 at the beginning of this document.

7. I missed the answer regarding custodial personnel - we have a custodian available for garbage removal and in case there are any trays spilled, etc. Only in the lunchroom/commons area for maybe an hour a day total.
   o Whether or not the TAs and custodial staff who are in the lunch room require training depends on whether their functions are actually School Nutrition Program functions such as monitoring whether reimbursable meals are taken or handling food. See USDA Question 28 at the beginning of this document.

8. Do building principals and the superintendent that approve the free and reduced applications have to meet the professional standards requirements? If the principals and superintendent need the training, what amount of training do they need?
   o Approving free and reduced applications is an important function of the School Nutrition Programs. If these individuals work less than 20 hours per week approving applications, then only 4 hours of training annually is required. The annual income application training and civil rights training would be appropriate. These individuals also probably attend other training throughout the year related to Administration or Communications and Marketing which would fall under the Professional Standards Key Areas and Topics that would be appropriate to their position with the program.

9. Do food truck delivery drivers need this additional training too? The only thing these staff members do is drive a delivery truck.
   o If the truck driver is only driving the truck (meaning there is another staff person doing all of the food handling, temperature monitoring, etc.) and the driver has no contact with program participants, then the driver would only need training in driving a truck which is not a specific school nutrition task. However, USDA FAQ #30 reminds us: 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.

10. If you have someone else do your verification and that is all they do for you do they need the 4 hours each year?
    o USDA addresses this question in FAQ #29: 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 individuals 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.

11. I have a person that comes in and just counts the lunches and make changes if necessary, he is there 30-40 minutes a day, that all he does, he does he need any training? He has the list who is eating and cold

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lunches, extra milk and makes changes if necessary. This list has all students, this list keeps track of free and reduce, paid lunch.

- This sounds like some of the specific School Nutrition tasks included in Question 28 at the beginning of this document.

12. Question 25 from USDA FAQ seems appropriate to add even though not specifically asked during the webinar: 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 the food service 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. See also Questions 23 and 24.

II. What counts as training?

13. One of the kitchen managers took the ServSafe class in 2013 and wants to know if she can count those hours for this year's continuing education.

- No. USDA has indicated that training received by school nutrition program personnel between April 1 and June 30, 2015 (three months prior to July 1, 2015), will count toward the SY 2015-2016 training requirements for directors, managers, and staff. (USDA FAQ #18.) Also 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. In Iowa, we have decided that training can carry over. However, neither of these situations apply to this question.

14. Staff that is not certified or a member of SNA, can they go to the state convention to get their CEU’s for the following year?

- Non-members may register for SNA events. The cost is often higher for non-members.

15. We do the Bloodborne Pathogens and 2 other trainings at the beginning of the school year through AEA. Can those count as part of the training? You mentioned that the Bloodborne Pathogens Training counts toward Continued Ed. training, does it count for a whole hour or unit?

- Allowable training should 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 areas and topics available at http://www.fns.usda.gov/sites/default/files/cn/ps_learningtopics.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. (USDA FAQ #21)

- USDA has indicated that training activities lasting 15 minutes or more may be recorded using the FNS Training Tracking Tool. A 15 minute training would count as 0.25 training hours, 30 minutes as 0.5 hours, etc. Most online training opportunities indicate the number of training hours allowed for their completion.

16. I am an RCCI, I currently have student helpers. They have food safety training and training in offer vs. serve. Will this be adequate?

- These students probably fit under the status of volunteers which we have designated in Iowa need only have training adequate to do their job.

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III. Time Period for Training/Record Keeping

17. When does the requirements need to be completed? Is it beginning of July to end of June?
   o Yes, the training is expected every school year which goes from July 1 to June 30. See also the
     carryover provisions discussed in Question 13 above.

18. Does the tracker tool qualify as an official document for CEU for leveling up in profession?
   o We did not understand this question, but the USDA tracking tool is certainly an acceptable tool for
     documenting training.

19. Who will be looking at the information for Professional Standards that we have documented. Will it be
    looked at during our 3 year Reviews?
   o Yes, training records and documentation of qualifications of directors hired after July 1, 2015 will
     be checked during the Administrative Review. Records that list the employee name, employer/school,
     training title, topic/objectives, training source, dates and total training hours would be appropriate to
     demonstrate training completion. Records must be maintained and made available to the State agency
     upon request (USDA FAQ #41).

20. Do you have to get an agenda approved to be sure you are addressing particular areas and who would you
    send your agenda to for approval?
   o No pre-approval is required. As a guide when planning training, use the list of key training areas
     and topics available at http://www.fns.usda.gov/sites/default/files/cn/ps_learningtopics.pdf, or the Professional
     Standards Learning Objectives handout from this webinar. Training must be job-specific and
     intended to help employees perform their duties well.

IV. Budget Concerns Related to Providing Training

21. How do I pay them for this training? My budget is very tight. They are hourly employees so I am unable to
    send them home asking them to use their home computers for on-line training.
   o Since training of even 15 minutes counts as training, it seems possible that 30 minutes per month
     could be scheduled within normal employee working hours so extra funds are not necessary. Consider
     adjusting the menu one day a month to allow for this extra time. See also Question 22 below.

22. Is there grant funding to cover the costs for labor time during training. I see this as an allowable expense,
    but my budget is very limited.
   o Iowa has received a Professional Standards grant which does provide for travel and sub pay for some
     training events in the next two years. Look for more information about workshops in Council Bluffs
     and Cedar Rapids the end of April as well as a Team Up for School Nutrition Success workshop the end
     of September. For future years, see also the answer to Question 21 and the training ideas on the next
     page.

23. There were also several ideas for training requested by participants. See the next page for suggestions
    based on these requests.
Ideas for training topics requested by January webinar participants

- Staff training on reimbursable meals- a video for staff to watch
  - *Iowa School Meal Web-Based Tutorials on “Meal Patterns” and “Offer vs. Serve”*  
  - *Meal Pattern 101 or Rise and Shine! It’s Breakfast Time! Recorded webinars at*  

- Session on salad bars.
  - *Iowa School Meal Web-Based Tutorials on “Food Bars”*  
  - *Salad Bars in School Nutrition Programs-Webinar from ICN*  

- Do you have any hands on training for preparing food using commodities?
  - We will keep this one in mind.
  - This page from USDA’s Team Nutrition page has other resources about USDA Foods:  
  - The *Cooks for Kids* series from ICN may also have some information on using USDA foods (commodities). We realize this is not “hands-on”  
  - *Culinary Techniques for Healthy School Meals* online course from ICN includes video presentations about preparing several different types of foods and practice activities to complete on the job.  

- Staff training on fruit and vegetable serving sizes and sub groups of vegetables
  - ICN Vegetable Subgroup Interactive Exercise  
  - *Iowa Fruit and Vegetable Portion Size poster*  

- Food waste videos how to decrease the amount of food wasted.
  - We will keep this one in mind.
  - This page from USDA’s Team Nutrition page has other resources about Waste Management:  

- A video of meal components for elementary students to watch on meal components what makes a meal and how they can prevent waste ex if they don’t like milk the don’t have to pick it up but they need 3 other meal components....
  - Will keep this one in mind.
  - There is a Build a Healthy Lunch lesson for Elementary Students on our Bureau Communication Tools page.  
    [https://www.educateiowa.gov/pk-12/nutrition-programs/supporting-school-meals](https://www.educateiowa.gov/pk-12/nutrition-programs/supporting-school-meals)
  - There is a video from an Ohio school, but there are several references specific to how they serve at their school.  
    [https://www.youtube.com/watch?v=A9u4GxUfgDw](https://www.youtube.com/watch?v=A9u4GxUfgDw)

- Work efficiencies for FSD that are often “doing it all” from administration and record keeping, marketing, menu planning, FPRs, managing staff, absenteeism and staff incentives, to prepping, cooking, serving and cleaning up. Staff is very limited in capabilities — wonderful people, but need a lot of direction, mentoring and leadership. More of “in the trenches” topics would be helpful for the smaller school districts perhaps.
  - Resources for training staff “No Time to Train” resources from ICN  
  - Training for Food Service Director- several Human Resources online courses from ICN  
    also some culinary courses