



April 7, 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

**Docket ID: FNS-2011-0030**

Re: Comments on RIN 0584-AE19 Professional Standards for State and Local School Nutrition Programs Personnel as Required by the Healthy, Hunger-Free Kids Act of 2010

Dear Ms. Brewer:

The Society for Nutrition Education and Behavior (SNEB) appreciates the opportunity to comment in strong support of the U.S. Department of Agriculture's proposed rule on Professional Standards for State and Local School Nutrition Programs Personnel as Required by the Healthy, Hunger-Free Kids Act of 2010. SNEB represents the unique professional interests of nutrition educators in the United States and worldwide. SNEB is dedicated to promoting effective nutrition education and healthy behavior through research, policy and practice with a vision of healthy communities, food systems and behaviors. Many SNEB members work in schools and with students and parents on nutrition education and promotion efforts, and as school food service professionals themselves preparing and serving healthy meals.

We commend the USDA for proposing to establish minimum professional standards for school nutrition personnel who manage and operate the National School Lunch and Breakfast programs, including hiring standards for state and local school nutrition program directors and annual training and education requirements. The proposed rule ensures consistent hiring, continuing education, and training standards for school nutrition personnel at all levels, and it makes sure that staff can maintain and grow their knowledge and skill set.

SNEB submits the following comments for your consideration as you work to finalize the regulation.

### **Hiring standards for school nutrition program directors**

SNEB supports the establishment of minimum hiring standards for local and state school nutrition directors as well as the tiered approach that recognizes the need to differentiate hiring standards for local directors based on local education agency, or LEA, characteristics.

We urge USDA to ensure adequate resources are provided for training and technical assistance for school foodservice directors, especially those operating small school food authorities (SFAs) who may not have as much expertise initially.

### **Minimum required annual continuing education and training for school nutrition program directors, managers, and other staff**

In addition to the hiring standards, it is critical to ensure that those hired and practicing maintain these competencies through annual continuing education. SNEB supports the flexible, non-prescriptive continuing education requirements outlined in the proposed rule. We agree that training for staff should be reasonable and achievable and target specific school nutrition staff levels, including new and current directors, managers, and other food service staff.

The four core areas of the Food and Nutrition Service, or FNS, certificate program, including nutrition, operations, administration, and communications and marketing, offer a wide variety of practical trainings for school nutrition personnel. We encourage USDA to provide some specificity around training topics for school nutrition directors, managers, and other staff related to nutrition, health, and safety in the final rule. Offering training on relevant topics such as nutrition education and promotion, marketing and communications, advocacy, cultural differences, and menu development that matches equipment capabilities, can be an opportunity to not only help staff reach their potential, but could serve to strengthen the overall food service operation.

We appreciate that the USDA will accept training from a wide variety of sources and that the agency and other partners intend to provide free and low-cost education and training resources to meet the requirements. We also encourage the agency and other organizations that will be developing training materials to ensure that food service personnel consider the resources to be empowering and motivating.

### **Funding**

Under the proposed rule, the nonprofit school food service account can be used to cover the costs of continuing education and training that are reasonable, except those incurred by an individual to meet the requirements to be hired as a school nutrition program director or for obtaining college credits. We encourage the USDA to consider how existing resources, such as Team Nutrition grants and State Administrative Expenses, might be used to help pay for training for school food personnel. Once this rule is in place, and USDA is able to monitor and calculate the training delivery and needs in states and LEAs, USDA should consider increasing budget requests for training expenses down the road.



In addition, we encourage the USDA to broadly communicate the updated professional standards and to work with the Department of Education to ensure that school administrators understand the importance of the school nutrition professional standards and training requirements for all key staff – not just the foodservice director. Given that one of the main barriers to adequate training for foodservice personnel is often time, it is important for the USDA to encourage districts to incorporate training and in-service education time into their budgets, including facility use and compensation for hourly employees.

#### **Areas of clarification**

While the proposed rule includes many strong components, we urge the USDA to consider clarifying several aspects.

- Clearer guidance and technical assistance to state and local agencies that define appropriate training topics and requirements to include:
  - What counts as training
  - Preapproval process
  - Dissemination of USDA and non-USDA training
- Inclusion of an evaluation component to determine if training offered is appropriate and effective

#### **Conclusion**

SNEB fully supports USDA's proposed rule addressing minimum hiring and continuing education and training requirements for school nutrition personnel and commends the Food and Nutrition Service for developing this proposed rule on Professional Standards for State and Local School Nutrition Programs Personnel. We stand by ready to assist to ensure that school food service professionals are successful in their important work to plan, prepare, and serve healthy meals to millions of students each and every day.

Respectfully submitted,

A handwritten signature in black ink that reads "Joanne Ikeda".

Joanne Ikeda  
SNEB President