Division of Food and Nutrition:  
Professional Standards for School Nutrition Personnel  
Questions and Answers

**Hiring Standards**

**Q1:** I was hired before July 1, 2015. Do I need to meet the new hiring standards?  
**A:** No.

**Q2:** We advertised for the position of school nutrition program director prior to July 1, 2015, but have not yet filled the vacancy. Does the new hire need to meet the hiring standards in the final rule?  
**A:** No. School Food Authorities and State agencies may hire a candidate that meets employment requirements in place prior to July 1, 2015, provided the vacancy is advertised prior to the final rule’s effective date of July 1, 2015.

**Q3:** Does ServSafe training count toward the required food safety training for new school nutrition program directors?  
**A:** Yes.

**Q4:** What is “relevant school nutrition programs experience”?  
**A:** Typically, this phrase refers to previous work experience in the NSLP and SBP, as well as experience in other child nutrition programs (the Child and Adult Care Food Program and/or the Summer Food Service Program) if the latter experience is gained from working in a school. The rationale for hiring actions based on an applicant’s work experience must indicate the applicant’s familiarity with USDA’s school nutrition programs. The intent of the professional standards regulations is to ensure that new school nutrition program directors have the knowledge and skills to manage the program as required. At the discretion of the State agency, experience gained from working in a school food service operation outside of USDA’s school nutrition program could count. The rationale for hiring decisions must be well-supported and documented.

**Q5:** Do acting or temporary school nutrition program directors need to meet the hiring standards?
Temporary or acting school food service directors expected to work three months (90 days) or less do not have to meet the hiring standards, provided the Local Education Agency (LEA)/School Food Authority (SFA) is actively seeking a replacement.

**Training Standards**

**Q6: Who will need to complete annual training?**
A: All personnel in the school nutrition programs are required to complete annual training. The amount of annual training required of each individual is based on whether an individual performs the job duties associated with a school nutrition program director, manager, or staff member.

**Q7: What is the job description of a school nutrition program director?**
A: The final rule defines school nutrition program directors as those individuals directly responsible for the management of the day-to-day operations of the school nutrition programs for all participating schools under the jurisdiction of the SFA.

The director’s duties 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. Program operators may use these functional areas to determine who is considered a school nutrition program director.

A sample job description for a school nutrition program director can be found at [http://www.nfsmi.org/documentlibraryfiles/PDF/20080221043346.pdf](http://www.nfsmi.org/documentlibraryfiles/PDF/20080221043346.pdf).

**Q8: What is a school nutrition program manager?**
A: The final rule defines a school nutrition program manager as individuals directly responsible for the day-to-day operations of the school nutrition programs for a participating school(s).

**Q9: What is school nutrition program staff?**
A: The final rule defines school nutrition program staff as individuals without managerial responsibilities who are involved in routine operations of the school nutrition programs for a participating school(s).

**Q10: What staff members are required to complete annual training?**
A: Program staff generally includes 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.

Q11: Will we need to complete annual training every year?
A: Yes. Although PDE is allowing carryover of training to the previous or subsequent school year (SY), the final rule requires some training be completed each SY.

Q12: How do we know how much each training contributes toward the annual training requirements?
A: Training is based on credit hours. If a training lasts an hour and a half, it will contribute 1.5 hours toward the annual training requirements.

Q13: I was hired before July 1, 2015. Do I need to complete annual training?
A: Yes. Beginning July 1, 2015, all school nutrition personnel are required to complete annual training.

Q14: Do acting personnel, substitutes, and temporary workers need to complete annual training?
A: PDE requires acting personnel, substitutes, and temporary employees (school nutrition program directors included) working more than three months (90 days) during the school year to complete annual training standards. Those working three months or less should receive adequate training specific to the tasks they will perform, but are not required to complete annual training. Because food safety is critical for program integrity, school nutrition program directors should ensure that any staff involved in food preparation and handling receive appropriate food safety training.

Note: PDE may re-evaluate the requirements for acting personnel, substitutes, and temporary workers in the future, as they are subject to State agency discretion.

Q15: Are volunteers required to complete annual training?
A: The final rule does not establish professional standards for volunteers (individuals receiving no payment or exchange for services whatsoever from the LEA or SFA), but gives the State agency discretion to extend the training standards to volunteers at all levels.

Although PDE is not requiring that volunteers complete annual training at this time, volunteers should receive adequate training specific to the tasks they will perform. Because food safety is critical, school nutrition program directors should ensure that any staff involved in food handling, including volunteers, are receiving appropriate food safety training.

Note: PDE may re-evaluate the requirements for volunteers in the future, as they are subject to state agency discretion.

Q16: Do we need to compensate staff for time taken to complete training? Or is this a part of the job requirement?
A: The LEA/SFA will decide whether staff will be compensated for time taken to complete training outside of normal working hours. Please note that training may be completed in increments, as time permits, to ease the completion of annual training. Team Work allows sponsors to log training in increments as short as 15 minutes.

**Q17: Is the Food Service Management Company (FSMC) staff required to complete annual training?**
A: Yes. All personnel in the school nutrition programs are required to complete annual training.

**Q18: We are a Residential Child Care Institution (RCCI) with group homes. The staff prepares the meals. It may be one staff member today and another tomorrow. They are hired as youth counselors. How much training do they need?**
A: If these individuals are working three months (90 days) or less throughout the year, they are not required to complete annual training. If they are working in the food service operation/food preparation and handling for more than 90 days throughout the year, they are required to complete the annual training requirements associated with their position (i.e. school nutrition program staff).

PDE strongly encourages that all staff involved in food handling receive health and safety training, as applicable.

**Q19: Is a secretary for the food service department required to complete annual training?**
A: Yes. The food service secretary is considered a school nutrition program staff member and is required to complete 6 hours of annual training (4 hours for SY 2015-16) if s/he works 20 hours or more each week throughout the SY, and 4 hours of annual training if s/he works less than 20 hours each week throughout the SY.

**Q20: Our building secretaries process the free and reduced-price meal applications. This is their only role in the school's food service operation. Do they need to complete annual training?**
A: Office staff members that process free and reduced-price meal applications or that provide other support for the school nutrition programs for only a short period of time during the SY are not required to meet the annual training requirements. However, these individuals should receive adequate training specific to the task(s) they will perform.

This situation is different from office staff working on program activities 20 hours or more per week throughout the SY; in that situation, staff are required to complete 6 hours of annual training (4 hours for SY 2015-16). Staff working less than 20 hours per week on program activities throughout the SY are required to complete 4 hours of annual training.
Q21: Does a driver who is employed by maintenance need to complete annual training?
A: If the food delivery employee monitors refrigeration, food temperatures, inventory/delivery sheets, etc., then s/he 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, regardless of the department in which they were hired. Otherwise, training would not be required.

Q22: Do maintenance workers/mechanics that perform services for food service need to complete annual training?
A: No. A person who provides support to, but is not specifically involved in, the operation of the school nutrition programs, such as a maintenance worker or cleaning custodian, is not required to meet the training standards (even if they are paid, in part, using nonprofit food service account funds).

Q23: Do dishwashers have to complete the annual training requirements?
A: If their food service-related responsibilities do not extend beyond dish washing, no, they are not required to complete annual training; however, all personnel involved in maintaining a clean and safe meal preparation area of the food service operation are encouraged to complete food safety training.

Q24: Do the annual training requirements apply to individuals with disabilities who are in supported or work training programs and placed in a school kitchen?
A: Yes. All personnel working throughout the SY in the school nutrition programs are required to complete annual training.

Q25: Do consultants to a SFA need to complete the annual training requirements?
A: No, however, if a consultant is filling in or acting as the school nutrition program director (or other role, as applicable) for more than three months (90 days), h/she must complete the annual training required of that role. SFAs are responsible for ensuring that hired consultants have the knowledge and skills needed to effectively assist in the administration and operation of the school nutrition programs. Prior to hiring a consultant, the SFA may want to examine and insure that the consultant is maintaining adequate and current training/continuing education.

Q26: We have a support person whose only function is to submit monthly claims. Do they have to complete the annual training requirements?
A: Yes. This individual works throughout the SY on school nutrition program activities and must meet the annual training requirements at the staff level. A staff member who spends less than 20 hours per week throughout the SY on food service-related responsibilities must complete 4 hours of annual training, while a staff member who spends 20 hours or more per week on food service responsibilities throughout the SY must complete 6 hours of annual training (4 for SY 2015-16).
Q27: Are employees who play a role in the food service operation, but are paid through other funds (and not the non-profit food service account) required to complete annual training?
A: Yes. 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.

Q28: If a Business Manager is only responsible for the financial piece of the school nutrition program, do they need to complete annual training?
A: Yes. Examples of appropriate trainings for a Business Manager responsible for the financial piece of the school nutrition program include meal counting and claiming; compliance with regulations/policies related to the financial management of school nutrition programs; budgets; financial analysis; pricing; and communicating financial information.

Please see USDA’s list of key training areas, topics and subtopics that sponsors will use to identify trainings when logging annual training hours into Team Work. It is located on PEARs, Download Forms, form PDE-SNP-253.

Q29: We do not have a school nutrition program director. We completely outsource the entire operation to an FSMC. Is the LEA required to complete annual training?
A: The SFA is the legal entity held accountable for oversight and compliance with federal regulations governing the school nutrition program. Therefore, the LEA employee responsible for oversight of the FSMC will be required to complete the annual training requirements of a school nutrition program director. The LEA employee in this capacity must ensure that the FSMC employees providing services for the school nutrition programs have the required annual training.

If an FSMC employee also performs director-type duties, then both the LEA employee and FSMC employee are responsible for fulfilling the annual training requirements of a director.

Q30: Is a business manager who is only involved with the FSMC contract renewal process considered a school nutrition program director?
A: If the LEA employee tasked with FSMC oversight is the business manager, then he/she is considered a school nutrition program director and would be required to complete the annual training requirements of that role. A newly hired person in this role must also meet the hiring standards for a director if the vacancy was advertised and filled after July 1, 2015.

Q31: How does it work if we have an FSMC, and our SFA employee responsible for FSMC oversight spends only a portion of his/her time on food service-related responsibilities?
A: Although the LEA employee tasked with FSMC oversight only spends a portion of his/her time on food service-related responsibilities, the LEA employee is required to complete the annual training associated with a school nutrition program director. A school nutrition program director must complete 12 hours of annual training (8 for SY 2015-16). If the director’s position is vacated, the individual hired in his/her place must meet the hiring standards for a director of the appropriate size LEA category.

Q32: We have an employee who handles lunch account payments and balances. Would this person need to meet annual training requirements?
A: Yes. If this individual performs these duties throughout the SY, s/he must meet the training requirements of a school nutrition program staff member. A staff member who spends less than 20 hours per week throughout the SY on food service-related responsibilities must complete 4 hours of annual training, while a staff member who spends 20 hours or more per week on food service responsibilities throughout the SY must complete 6 hours of annual training (4 for SY 2015-16).

Q33: Do our lunch room aides need to complete annual training? Their job duties consist of watching students, monitoring bathrooms, and opening plastic ware.
A: If the job duties of the lunch room aides are truly limited to observing students, monitoring bathrooms during meal service times, and opening plastic ware, they would not be required to complete annual training.

Q34: Our lunches are pre-packaged and sent to the classrooms, making classroom teachers/aides the point of service (POS) on a roster. Do they need to complete annual training?
A: No, however, it is encouraged that these individuals receive adequate training specific to the task(s) they are performing.

Q35: If a staff person only records classroom rosters for the POS into our electronic system, do they need to complete annual training?
A: If this staff member’s responsibilities are truly limited to transferring data from paper into the electronic system, they are not required to complete annual training; however, it is encouraged that he/she receive adequate training specific to the task(s) they are performing.

Q36: Is a person who is responsible for accounts payable and food service-related bills required to complete annual training?
A: Yes. If this individual performs these duties throughout the SY, s/he must meet the training requirements of a school nutrition program staff. A staff member who spends less than 20 hours per week throughout the SY on food service-related responsibilities must complete 4 hours of annual training, while a staff member who spends 20 hours or more per week on food service responsibilities throughout the SY must complete 6 hours of annual training (4 for SY 2015-16).

Q37: What about a staff member who occasionally "moves up" to the manager position due to a short-term absence? For example, many union contracts
specify that employees may move up by seniority from regular staff member to head cook if the head cook takes a day off.
A: If a staff member “moves up” or acts as the school nutrition program manager more than three months (90 days) throughout the SY, s/he is required to complete the annual training requirements of a director. A staff member acting as a school nutrition program manager 3 months (90 days) or less throughout the SY is required, at a minimum, to complete the training requirements of a staff member. Staff who are authorized to occasionally fill in for a manager will require training specific to completing the manager’s duties in addition to their regular staff duties.

Q38: Are there requirements for the type of training completed?
A: Although the final rule specifies the amount of training required of school nutrition personnel, it does not mandate the type of training to be completed. Allowable training should focus on the day-to-day management and operation of the school nutrition programs. Training must be job-specific and is intended to help employees perform their job duties well. 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 be in compliance with program regulations.

Q39: Will PDE’s webinar on Professional Standards that took place in June count toward the annual training requirements?
A: Yes. Allowable training received from April 1st – June 30th, 2015 counts toward the annual training requirements for the 2015-16 SY.

Q40: Can the training school nutrition program directors provide their staff count toward their own annual training requirements?
A: Yes. Both school nutrition program directors and managers can count training they provide to staff toward their own annual training requirements.

Q41: Can a staff member who is a ServSafe instructor count his/her trainings provided to other staff toward his/her own training requirements?
A: No. Only school nutrition program directors and managers may count training they provide toward their own annual training requirements.

Q42: Does ServSafe training count toward the annual training requirements?
A: Yes.

Please note that new school nutrition program directors must complete 12 hours of annual training (8 for SY 2015-16). This is in addition to the 8 hours of food safety training that is required within 5 years prior to, or within 30 days after, their start date under the hiring standards.

Q43: Do the trainings on School Nutrition Toolbox count toward the annual training requirements?
A: Yes.
Q44: Can staff log into School Nutrition Toolbox (www.schoolnutritiontoolbox.org) under my name to complete training, or will they need a separate account?
A: Each staff member should create their own personal account. New accounts can be set up by clicking on the “How to Register Tab” at the top of the homepage, then “Create Account.”

Q45: Does child abuse training count toward the annual training requirements? Does CPR count?
A: Only training that fosters proper administration and operation of the school nutrition programs counts toward the annual training requirements. Although child abuse training is required for all school employees under Pennsylvania law, for purposes of Professional Standards, it does not count toward the annual training requirements.

In order to maintain a safe meal service area, it is important there is a trained individual equipped to perform CPR in the case of an emergency. For this reason, CPR training may count toward the annual training requirements.

Q46: Does the PrimeroEdge training on Team Work count toward the annual training requirements?
A: Yes.

Q47: Do monthly manager meetings count toward a manager’s annual training requirements?
A: Only training that fosters proper administration and operation of school meals programs count toward the annual training requirements. If these meetings consist of topics and discussions relevant and pertinent to the school nutrition program operation, they may count toward a school nutrition program manager’s annual training requirements.

Q48: Can we use "self-directed" worksheets as training hours?
A: Completion of self-directed worksheets administered through reputable professional associations, organizations, and education institutions may contribute toward the annual training requirements. PDE expects that trainings such as self-directed worksheets, assigned readings, and articles with self-administered quizzes will be selected and overseen by the program director/manager, and be used on a limited basis when a staff member is unavailable for interactive trainings.

Q49: Does a back-to-school meeting to discuss the upcoming school year count toward the annual training requirements?
A: A back-to-school meeting to discuss policies and procedures specific to the school nutrition program may count toward the annual training requirements. However, a back-to-school meeting to discuss general LEA policies and procedures may not.
Q50: Does the Child Abuse Recognition and Reporting Training that is required of all Pennsylvania school employees count toward the annual training requirements?
A: Only training that fosters proper administration and operation of the SNP may count toward the training standards. Because the Child Abuse and Recognition Training is not specific to the operation of school food service, this training would not count toward the annual training standards for school nutrition personnel.

Q51: What are examples of in-house trainings for SFAs? Are there resources available to help the SFA conduct their own in-house trainings?
A: SFAs may conduct a variety of in-house trainings based on their staff’s needs. Proper knife skills, food safety, and civil rights are some examples of topics school nutrition program directors can consider when planning in-house trainings for staff.

The Institute of Child Nutrition (formerly the National Food Service Management Institute) has a variety of resources available on their website for SFAs interested in providing in-house training (http://www.nfsmi.org/Templates/TemplateDivision.aspx?qs=cElEPTU).

Q52: Do schools that do not participate in the NSLP have to comply with Professional Standards?
A: The Professional Standards for School Nutrition Personnel final rule does not apply to schools not participating in the NSLP. The requirements in the final rule would still apply to the schools within the district that are participating in the NSLP.

In the situation where only some schools within a school district are participating in the school meal programs, the LEA size would be based off of the enrollment for only the participating schools when determining hiring standards for the school food service director.

Q53: Do school nutrition program directors have to continue completing food safety training even after completing the food safety training required of newly hired directors?
A: Yes. All school nutrition program directors are required to complete at least 8 hours of food safety training every 5 years.

Because food safety is critical for program integrity, school nutrition program directors should ensure that all school nutrition personnel responsible for preparing and serving food are also receiving proper food safety training.

Food Service Management Companies

Q54: Who is responsible for keeping track of FSMC employees’ annual training?
A: The SFA must ensure that the FSMC staff have the knowledge and skills to supply safe and nutritious meals that meet the meal requirements. FSMC staff may log their
training into Team Work. The LEA employee responsible for FSMC oversight will monitor the FSMC employees’ compliance with the annual training requirements and logging of training by checking Team Work periodically. The SFA must ensure documentation from the FSMC to show compliance with the annual training standards is available to the State agency. Contracts for SY 2015-2016 that do not include this language will probably need to be amended to include additional language to reflect compliance with the professional standards requirements. Contracts for SY 2016-2017 will contain this language.

Q55: Our district has an FSMC. Is the school district employee who oversees the food service operation considered the school nutrition program director? And would the FSMC director be considered the school nutrition program manager?

A: The school/school district employee in charge of overseeing the FSMC is considered the school nutrition program director. If the FSMC employee also performs director-type duties, then that FSMC employee is also responsible for fulfilling the annual training requirements of a director as well.

Recordkeeping

Q56: What documentation is required to demonstrate completion of the annual training?

A: The final rule does not specify the type of records that must be kept; however, there must be sufficient and specific documentation available to the State agency so compliance with professional standards can be assessed during an 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. Examples can include sign-in sheets, training agendas, certificates, etc. Records must be maintained for three years plus the current school year, and made available to the State agency upon request.

Q57: Who is responsible for entering training hours in PrimeroEdge?

A: SFAs should identify staff and implement a procedure for entering annual training into Team Work and filing training documentation.

Q58: Do we have to use Team Work in PrimeroEdge to track training?

A: PrimeroEdge is available for use by school nutrition program sponsors in Pennsylvania at no cost. In Pennsylvania, sponsors will use Team Work to track their training and demonstrate compliance with the annual training requirements.

Q59: If we do not currently use PrimeroEdge, can we log staff training on our own?

A: Logging training in Team Work ensures that all information is documented and available for PDE to view during the off-site portion of the Administrative Review. If you do not currently use PrimeroEdge, contact CN Resource at pahelp@cnresource.com or call 1-855-286-7685 for a login and password to access Team Work. Failure to use
Team Work prevents PDE from assessing this portion of the review off-site, and also puts the SFA at risk for missing important information when documenting annual training.

**Q60: Will we have to track and log training for each employee?**

A: Yes. The SFA must track completed trainings and maintain documentation demonstrating all school nutrition personnel are meeting the annual training requirements associated with their role in the school nutrition program.

**Q61: How often do we need to enter the hours into Team Work, or is it only at review time?**

A: In order to make sure completed training is documented as accurately as possible, it should be documented as it is completed.

It is important to periodically review staff progress in completing annual training to ensure all school nutrition personnel are able to meet their annual training requirements each SY.

**Resources**

**Q62: Will the Professional Standards for School Nutrition Personnel webinar PDE, Division of Food and Nutrition (DFN) presented in June 2015 be available for download?**

A: Yes. The webinar slides are located on PEARSH→Download Forms→Professional Standards for School Nutrition Personnel section→form PDE-SNP-258. The link to the webinar recording is also located under the Professional Standards for School Nutrition Personnel section on Download Forms, form PDE-SNP-62.

**Q63: Will webinars and other trainings completed before the final rule's implementation date of July 1, 2015 count toward the annual training requirements for SY 2015-16?**

A: Training completed during the 90 days prior to July 1, 2015 (April 1, 2015 to June 30, 2015) will count toward SY 2015-16 annual training requirements.

**Q64: Will PDE, DFN offer training?**

A: Yes. Current webinars and modules that PDE has developed to date are available for viewing through PEARSH and on Project PA’s and the School Nutrition Toolbox’s websites. In addition, any new in-person trainings, webinars, and modules will be announced on PEARSH and also made available and accessible through PEARSH, Project PA’s and the School Nutrition Toolbox’s websites. PDE recommends frequently checking the Training Information section at the bottom of the PEARSH Message Board for announcements of training opportunities.

**Monitoring and Compliance**
Q65: What if my staff refuses to attend training?
A: School nutrition personnel should be informed annual training is now required by law. Situations in which employees refuse to comply with the regulations in the Professional Standards for School Nutrition Personnel final rule should be addressed through local policies or procedures the LEA has in place to handle such situations.

Q66: What if we schedule a training for our staff and one of our employees does not attend?
A: It is up to the SFA to decide how situations such as these will be handled. If the training is determined to be critical to that employee’s job, a possible solution is to provide the training material to the employee who did not attend the original training in increments, as time permits.

Q67: What are the consequences of non-compliance?
A: PDE, DFN will monitor an SFA’s compliance with the professional standards during the Administrative Review. As part of the general areas of review, PDE, DFN will examine records that document completion of applicable hiring and continuing education/training requirements. Technical assistance is the first course of action to facilitate compliance.

Q68: What happens if we’ve hired a new school nutrition program director who does not meet the hiring standards in the final rule?
A: PDE will provide technical assistance and determine a corrective action plan necessary to bring the SFA into compliance.

Miscellaneous

Q69: We participate in the Afterschool Snack Program (ASP). Will staff working with the ASP need training?
A: Staff working solely with the ASP are not required to complete annual training. If ASP staff also work in the NSLP, they will already be completing training required of their role in the school meal programs. Please note that PDE strongly encourages that all staff involved in food handling receive health and safety training, as applicable.

Q70: Are there similar standards for other Act 93 positions? Are Superintendents and Business Managers being informed of these standards by PDE? If so, due to the exponentially increasing responsibilities/specialized skills that are presumably the impetus for these standards, does PDE offer any suggestion to districts that Directors begin receiving similar consideration in terms of respect/salary as other Act 93 roles?
A: In order to educate the broader audience of administrators, school board members and business managers about the new Professional Standards requirements, the PDE, DFN has presented webinars and provided written articles through the Pennsylvania School Boards Association and the Pennsylvania Association of School Business Officials. Because Act 93 provisions fall outside of the scope of the federal child nutrition
programs that DFN administers, you would have to consult with the appropriate area within PDE for guidance regarding that statute.