




# Professional Standards, Unpaid Meal Charge Policy, Recordkeeping

School Year 2020 - 2021




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## Purpose



- ▶ To ensure school nutrition personnel have the knowledge and skills to manage & operate the NSLP and SBP programs correctly and successfully
- ▶ Maintain Program Integrity

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## USDA Final Rule



- ▶ Established:
  - ▶ Minimum hiring standards for new school nutrition program directors
  - ▶ Annual continuing education/training requirements for all school nutrition personnel

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 **Hiring Standards:  
SNP Directors**




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 **SNP Directors: Hiring Standards**

Before July 1, 2015 – grandfathered  
Hired **AFTER JULY 1, 2015:**

- ▶ Education
- ▶ Experience
- ▶ Food Safety Training



Hiring standards also apply to student enrollment categories:  
Student Enrollment: 2,499 or less  
Student Enrollment: 2,500-9,999  
Student Enrollment: 10,000 or more

[https://fns-prod.azureedge.net/sites/default/files/cn/profstandards\\_flyer.pdf](https://fns-prod.azureedge.net/sites/default/files/cn/profstandards_flyer.pdf)

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 **Final Rule Flexibilities**  
Effective April 30, 2019

- ▶ More flexibility for small SFAs that have challenges in meeting hiring standards
- ▶ 4 flexibilities
- ▶ Do **NOT** affect annual training hours for all school nutrition staff



SP 05-2020: <https://fns-prod.azureedge.net/sites/default/files/resource-files/SP05-2020os.pdf#page=3>

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### SNP Directors Hiring Flexibilities Standards

Student enrollment: **2,499 or less**  
Applicants with relevant food service experience (including volunteer work)

Student enrollment: **500 or less**  
Applicants with minimum required education; less than required years of food service experience

<https://www.fns.usda.gov/cn/fr-030119>

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### SNP Directors: Hiring Standards

**Minimum Prior Training Standards  
(required)**

At least 8 hours of food safety training is required either

- not more than **5 years prior** to their starting date, or
- completed within **30 calendar days** of employee's start date.

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### Hiring Documentation



Maintain documentation to demonstrate compliance with hiring standards:

- ▶ College transcripts
- ▶ Education information
- ▶ Resumes for new hires
- ▶ Food safety training

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**If you are a SFA who is hiring a new director, but he/she does not meet the hiring standards, you will need approval from HCNP BEFORE hiring that individual.**



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**More information on the School Nutrition Program Director Professional Standards are found at:**

► <https://www.fns.usda.gov/school-meals/professional-standards>

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**Training Requirements**



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**Hawaii Child Nutrition Programs**

## Annual Training Requirements

	SY 2016-17 & Beyond
<b>Directors*</b>	12 hours
<b>Managers</b>	10 hours
<b>All Other Staff</b>	6 hours
<b>Part-Time Staff</b> (less than 20 hrs/wk)	4 hours

\*This required training is in addition to the food safety training required in the first year of employment.

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**Hawaii Child Nutrition Programs**

The diagram features a central green circle labeled "Areas of Training". Surrounding it are four other circles: a yellow circle for "Nutrition", a brown circle for "Operations", a green circle for "Communication and Marketing", and a red circle for "Administration". Small colored dots are scattered around the central circle.

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**Hawaii Child Nutrition Programs**

## Maintain Training Documentation

- ▶ Demonstrate compliance with the annual training requirements
- ▶ Supporting documentation:
  - ▶ Training agenda
  - ▶ Sign-in sheets
  - ▶ Certification of Completion
  - ▶ Training logs

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**Hawaii Child Nutrition Program**

**USDA Professional Standards Training Tracker Tool**  
U.S. DEPARTMENT OF AGRICULTURE

► **Features**

- Ability to upload training completion certificates
- Summary report
- One employee (e.g. Director) may create profiles for their staff

► Requires a Level 1 USDA eAuthentication account (same as the online Food Buying Guide)

► Professional Standards Training Tracker Tool (PSTTT) webinar is available on the HNCP website or at:  
<https://www.fns.usda.gov/resource/webinar-track-training-star-professional-standards-training-tracker-tool>

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**Hawaii Child Nutrition Program**

**USDA Professional Standards Training Tracker Tool**  
U.S. DEPARTMENT OF AGRICULTURE

**Professional Standards Training Tracker Tool 2.0**

OMB Number: 0584-0026  
Expiration Date: 07/31/2020

The USDA Child Nutrition Program's Professional Standards Training Tracker Tool (PSTTT) Version 2.0 is designed to assist School Nutrition Professionals in keeping track of their annually required training hours. For additional information on Professional Standards, please visit USDA Professional Standards site at [www.fns.usda.gov/school-meals/professional-standards](http://www.fns.usda.gov/school-meals/professional-standards).

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**Hawaii Child Nutrition Program**

**PLEASE NOTE:** An USDA eAuthentication account is needed to access the tool. New and existing users who have an USDA eAuthentication account can proceed to the Tool by clicking on the "Login with eAuth Account" button. If you do not have an USDA eAuthentication Account, go to "Create Account". You will immediately receive an email with a link to activate your account with one simple click. The following training videos may be helpful in creating or setting up a new eAuth account:

- [Create a new eAuth Account](#)
- [Login for the first time](#)

Contact [cnpntab@usda.gov](mailto:cnpntab@usda.gov) for assistance in accessing the site.

**OMB Burden Statement:**  
This information is being collected to assist the Food and Nutrition Service as it helps local educational agencies and school food authorities to meet the training requirements and assist in keeping track of training as required by the Healthy Hunger Free Kids Act. This is a voluntary collection and information entered into the free web-based application tool is solely for the benefit of the local education agencies and school food authority's staff for the tracking of training and storing staff training information. This collection brings in personally identifiable information under the Privacy Act of 1974 via the user's USDA eAuthentication account. According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-0026. The time required to complete this information collection is estimated to average 1 hour and 12 minutes (1.200 hours) per response, including the time for reviewing instructions, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, 1320 Braddock Place, 5th Floor, Alexandria, VA 22314 ATTN: PRA (0584-0026).

[Login with eAuth Account](#)

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**Hawaii Child Nutrition Programs**

### Sample USDA Training Tracker Report

Employee Name	Job Title	Hiring Date	Training Title	Key Area	Training Topic	Learning Objective	Training Length	Completed Date	School Year
			HAWAII DOE COVID-19 TRAINING - TRAUMA	Administration - 3000	Human Resources and Staff Training - 3400	3450-Employee Health, Safety, and Wellness	01:00	8/8/2020	2020-2021
			USDA PROFESSIONAL TRAINING TRACKER	Nutrition - 1000	General Nutrition - 1300	1300-General Nutrition	01:00	8/12/2020	2020-2021
			SNA FEEDING STUDENTS IN A PANDEMIC	Nutrition - 1000	General Nutrition - 1300	1300-General Nutrition	01:00	8/13/2020	2020-2021

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**Hawaii Child Nutrition Programs**

**SFA:** \_\_\_\_\_ **TRAINING TRACKER TOOL**

**SCHOOL:** \_\_\_\_\_ **SY:** \_\_\_\_\_

LAST NAME, FIRST NAME	EMPLOYEE TITLE/POSITION	EMPLOYEE CATEGORY	HIRING DATE

NSLP TRAINING							
TRAINING DATE(S)	TRAINING PROVIDER/SOURCE	TRAINING TITLE	KEY AREAS	KEY TOPICS	LEARNING OBJECTIVES	TRAINING HRS	SY APPLIED TO

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**Hawaii Child Nutrition Programs**

**USDA Professional Standards**  
U.S. DEPARTMENT OF AGRICULTURE

**HOME ABOUT FIND A TRAINING EVENTS**

**Welcome to the Professional Standards Training Database**

The Professional Standards Training Database allows school nutrition professionals to search for training that meets their learning needs in one easy-to-use website. Trainings are available in a variety of formats and most trainings are free. Discover how you can meet your professional standards training requirements by searching the database today!

Search Professional Standards Training Database

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## Resources

**Info**

- ▶ <https://www.fns.usda.gov/tn/guide-professional-standards-school-nutrition-programs>
- ▶ SP 05-2020 <https://fns-prod.azureedge.net/sites/default/files/resource-files/SP05-2020os.pdf#page=3>

**Q & A's**

**Database**

**Training Resources:**

- ▶ <http://professionalstandards.fns.usda.gov/>
- ▶ <https://theicn.org/icn-resources-a-z/food-safety>
- ▶ <https://theicn.org/icn-resources-a-z/food-safety>  
(Previously known as "Serving it Safe")

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## Please view Part 2 of the Professional Standards, Unpaid Meal Charge Policy, and Recordkeeping Training

▶ Go to:  
<https://hcnp.hawaii.gov/training-resources/>

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To file a program complaint of discrimination, complete the <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf> (AD-3027) found online at: <https://www.usda.gov/oascr/how-to-file-a-program-discrimination-complaint>, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

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## Professional Standards, Unpaid Meal Charge Policy, and Recordkeeping Training

SY 20 – 21

### Part 2




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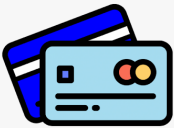
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## Meal Charge Policy




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## Meal Charge Policy

All SFAs operating NSLP and/or SBP must have a written meal charge policy in place.

- ▶ Collection of unpaid meal charges
- ▶ Explains how SFA will handle situations where children eligible for reduced or paid meals do not have money to cover the meal cost at the time of meal service.

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### Meal Charge Policy Requirements

- ▶ Required for all SFAs operating the Federal school meals program.
  - ▶ SFAs operating an exclusive Special Provision are exempt
- ▶ **Written policy provided** to families are start of each school year
  - ▶ Transfer students
- ▶ **Written policy provided** to school staff, particularly:
  - ▶ POS staff
  - ▶ Office staff
  - ▶ Social workers & liaison staff



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### Meal Charge Policy Requirements

- ▶ SFAs must maintain documentation of communication
  - ▶ The policy and methods of communication will be assessed by HCNP during Administrative Review
- ▶ Children who qualify for free meals can **NEVER** be denied a meal
- ▶ Include policies regarding collection of delinquent debt
  - ▶ Focus on households/parents

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### Alternate Meals (Non-reimbursable)

- ▶ Offer an economical meal that reflects FNS' nutritional goals
- ▶ Cost must be covered using non-Federal funds
- ▶ Subject to Smart Snack requirements
- ▶ Subject to revenue from non-program foods requirements
- ▶ Ensure children with disabilities have access to benefits and services as other children



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 **Hawaii State Law Requirements  
ACT 194 (S.B. 423)** 

- ▶ Signed into law on July 12, 2017
- ▶ No student shall be denied a meal solely for failure to pay:
  - ▶ Within the first 21 days of the first semester of a school year while the student's application for free or reduced lunch is being processed
  - ▶ Within 7 days after student's meal fund account reaching a zero or negative balance
  - ▶ DOE to adopt rules/policies for collection of funds for negative student meal balances

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 **Collection of Delinquent Meal Payments**

Unpaid charges considered 'delinquent debt' when payment overdue

- ▶ Delinquent debt: considered collectable and efforts are being made to collect it
- ▶ USDA does not regulate how long debt is considered delinquent
- ▶ SFA efforts to collect delinquent debt are an allowable use of Nonprofit School Food Service Account funds



SP 47-2016: Unpaid Meal Charges: Clarification on Collection of Delinquent Meal Payments

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 **Delinquent Debt vs Bad Debt**

Delinquent debt – unpaid meal charges for which payment is overdue

 versus

Bad debt – determined to be uncollectable

- ▶ Operating loss
- ▶ Nonprofit School Food Service account resources cannot be used

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### Recordkeeping – Bad Debt

- ▶ Evidence of efforts to collect unpaid meal charges
  - ▶ Evidence efforts followed timeframe and methods established
- ▶ Evidence when unpaid meal charges reclassified as Bad Debt
- ▶ Evidence of Bad Debt funds restored using non-Federal funds

7CFR 210.9(b)(17) and 7 CFR 210.15(b)

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### Date of Eligibility

- ▶ USDA permitted flexibilities for the date a student may receive benefits
  - ▶ SP 11 -2014: flexibility for retroactive reimbursement for meals served to student(s) while processing application
  - ▶ Contact NSLP Team to request for the flexibility

SP 46-2016 Unpaid Meal Charges: Local Meal Charge Policies  
SP 29-2017 Overcoming the Unpaid Meal Challenge

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## Recordkeeping

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## Purpose

- ▶ Ensure Program Integrity & Transparency
- ▶ Administrative Reviews
- ▶ Complaints
- ▶ Potential Audits
  - ▶ Investigations




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## Time Requirement

- ▶ The USDA requires sponsors to maintain records for **3 years plus the current year**
  - ▶ For SY 2019-20: must have records on file from SY 2016-17
- ▶ Longer if being audited

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## D.O.E. Time Requirement

The Hawaii Department of Education requires records to be kept for **6 years plus the current year**

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 **Special Provision Schools**



Schools participating in CEP, Provision 1, 2, or 3 must maintain base year (year one) records for duration of provision participation

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 **Which Forms?**

- ▶ Examples of forms/documents to keep on file:
  - ▶ F&R Price Applications
  - ▶ Enrollment & Student Eligibility Status' (including CEP information)
  - ▶ Production Records, Menus
  - ▶ Meal Counting Records
  - ▶ Edit Checks
  - ▶ Staff Training Logs
  - ▶ Outreach Documentation
- ▶ If unsure: KEEP ON FILE!

7 CFR 210 Subpart C

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 **Making Corrections & Adding Information**



- ▶ DO NOT use white out on official documents
  - ▶ Applications, meal counting records, production records, edit checks, etc.
- ▶ Make line through the error, write change/correction, initial & date
- ▶ If adding information: initial, date, provide explanation if necessary

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 **Hawaii Child Nutrition Program**

## Professional Standards, Unpaid Meal Charge Policy, and Recordkeeping Quiz

Link to Google Forms Quiz:

<https://forms.gle/EkbgdmGL4EkP5vCr6>

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 **Hawaii Child Nutrition Program**

## Questions?

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(808) 587-3600

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