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Submitter Information

Email: gavorekc@michigan.gov
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General Comment

The Michigan Department of Education (MDE) includes the United States Department of Agriculture (USDA) Professional Standards Training and Tracker Tool (PSTTT) in the training materials and resources provided to School Nutrition Program (SNP) sponsors, alongside other training and tracking options. At MDE, we recognize that SNP directors have a wide range of technical skill sets, and as a result, the USDA PSTTT can be difficult for some users. To ensure everyone has a practical and accessible option, our state agency created an Excel-based tracker that is simpler to use and does not require a web platform. SNP sponsors may also use their own locally developed tools if they meet all requirements pertaining to the USDA Professional Standards.

Microsoft Excel-based MDE Professional Standards Tracking Tool (https://www.michigan.gov/mde/-/media/Project/Websites/mde/Year/2017/10/12/Professional_Standards_Log_ADA_checked.xlsx?rev=1a383bad268f4648883f9d532b1702da&hash=7FCE7295B51AA33784109E34ED7A922F).

Through monitoring activities and the administrative review process, MDE has observed that use of the PSTTT is relatively infrequent. Small and medium SNP sponsors most often rely on a combination of online training sources (MDE, the Institute of Child Nutrition, the School Nutrition Association, etc.) and in-person training opportunities, such as conferences. Many food service directors also conduct their own in-person trainings to ensure staff meet USDA Professional Standards annual training requirements. As for tracking, small and medium SNP sponsors use their own locally developed tools or the MDE Professional Standards Tracking Tool.

Larger districts tend to use the PSTTT more frequently than smaller sponsors; however, their overall usage remains limited. These districts commonly use proprietary training management platforms that provide built-in training modules, as well as the capability to add external training from government agencies, professional organizations, or locally developed content.

Given MDE's limited use and observation of the PSTTT, and because MDE does not collect detailed feedback on user burden or system functionality, we are unable to provide comments on the accuracy of the agency's burden estimates, the methodology supporting those estimates, ways to enhance the quality or clarity of the information to be collected, or approaches to further reduce respondent burden.