DATE: June 1, 2026

SUBJECT: USDA Professional Standards Trainings and Tracker Tool, Document Citation: FR Vol 91, No. 61 Pages: 15944–15945

TO: gavorekc@michigan.gov

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.

Response: Thank you for sharing your feedback regarding the USDA Professional Standards Trainings and Tracker Tool (PSTTT). There are intentionally multiple options to track professional standards training hours so that districts can make the choice that works best for them. Use of the PSTTT remains optional. Prior to 2017, the PSTTT was a downloadable spreadsheet and there are still some districts that choose to utilize paper or spreadsheet tracking methods. The web-based PSTTT was developed in response to feedback from the downloadable spreadsheet.

If you are willing to share more about the specific challenges you've encountered with the PSTTT, that insight would be greatly appreciated and will help inform ongoing discussions. You may send any additional feedback to cnpntab@usda.gov.

Sincerely,

SHELDON GORDON

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Date: 2026.06.17 15:51:16 -04'00'

Sheldon Gordon, MS, RDN
Nutrition, Education, Training, and Technical Assistance Division Director
Child Nutrition Programs
Food and Nutrition Administration
U.S. Department of Agriculture