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General Comment

While the intent behind the Professional Standards Rule is vital for maintaining high-quality school meal programs, there is a significant disconnect between these federal mandates and the local resources available to execute them. I am submitting the following concerns regarding the practical burden of these requirements:

Unfunded Mandates: The requirement for mandatory annual training hours is a positive step for professional development, but it remains largely unfunded. Small and mid-sized school food authorities (SFAs) struggle to cover the labor costs associated with pulling staff away from the kitchen for training.

Loss of Dedicated PD Time: Due to years of aggressive budget cuts several years ago, many districts slashed the food service departments' dedicated Professional Development (PD) days. This leaves food service directors with no "on-the-clock" time to facilitate the very training the USDA requires, forcing a choice between operational efficiency and regulatory compliance, hardships with the unions, and meaningless 15-minute "power" trainings, just to stay compliant with the regulation. Have deidicated and funded professional development for the school food service staff is an investment in our future.

Lack of Relevant, High-Quality Resources: While the tracker tool helps track hours, there is a critical shortage of free, modern training content. Much of the available "free" material is outdated and fails to address the current realities of school food service, such as supply chain volatility, complex modern dietary needs, and contemporary kitchen technology, scratch cooking, and cooking skills.

Need for Administrative Support: To successfully mandate this training at the departmental level, SFAs need more than a tracking tool; they need federal language and financial support that reinforces training as a non-negotiable operational cost, similar to food safety inspections, similar to teachers, or any other professional that needs continuous professional development to keep current with licensing.

Recommendation: I urge the USDA to not only provide a tracking mechanism but to invest in a robust library of updated, relevant training modules and explore direct funding or grants specifically earmarked for the labor costs associated with professional standards compliance. Standardize "Authorized Training" Language for Unions: The USDA should provide standardized language that SFAs can use in collective bargaining and district-level mandates. This language should explicitly define these training hours as a federal requirement for continued operation, helping directors justify the time to school boards and labor unions despite previous budget cuts to PD days. Incentivize Peer-to-Peer "Scratch Cooking" Content: Rather than generic webinars, the USDA should fund the creation of high-definition, video-based training modules featuring actual school chefs, or provide real chefs in schools for live hands-on training. Content should focus on modern culinary skills (e.g., high-volume scratch cooking, global flavor profiles, and plant-forward entrees) to ensure the training is relevant to today's student preferences.