DISTRICT GOAL: WE EMPOWER ALL STUDENTS TO ACHIEVE POST-HIGH SCHOOL SUCCESS.

2016 Nutrition Services Dept.

Report to the Board

Susan Arakelian

NUTRITION SERVICES DEPT.

2016 BOARD REPORT

- > Nutrition Services Support of the District Strategic Plan
- > 2015-16 Strategic Plan and Operations
- > Profit/Loss FY 2015 and YTD January, 2016
- Legislative Actions Affecting Child Nutrition Programs
- > Challenges
- > Strategic Plan Draft for 2016-17

BSD's Nutrition Services department supports students in achieving post high school success by providing:

- Nutritious meals that appeal to students Students who are well nourished Nutrition Services meets the USDA standards for nutrient content of meals, (http://www.ode.state.or.us/wma/nutrition/snp/lunch-at-a-glance-v2.pdf), and tries to exceed the standards whenever financially possible, e.g. purchasing organic, local produce or chicken raised without anti-biotics. At the same time, Nutrition Services strives to ensure that the menu choices, food preparation and presentation are appealing to students. Providing nutritious meals that students will actually eat is a continual challenge as a perfectly planned "nutritious" meal doesn't meet its goal if students won't eat it.
- A self-supporting operation By Board Policy EF, (https://www.beaverton.k12.or.us/dist/Admin%20Regs%20and%20Policies/EFEFA.pdf) the Nutrition Services

- department is required to maintain a positive fund balance. This is important as it ensures precious General Fund dollars are not diverted to support Child Nutrition Programs.
- A welcoming, safe environment for students to eat and practice their nutrition skills Nutrition Services staff strive to ensure that students are always treated kindly and helpfully, with a warm welcome to the cafeteria. We also want to ensure that staff understand the dynamics of the Adult/Child feeding relationship so that students can safely practice their nutrition skills. For example, students should feel free to try small portions of new foods without fear that they'll be forced to eat an entire portion of a food they don't care for. Children become adventurous eaters with gentle encouragement, not pressure.
- Reliable resources for nutrition education and information Although separate funding for nutrition education at the district level is no longer available through USDA, the Nutrition Services Dept. works to provide access to reliable nutrition education resources and information to students, families and teachers.

> 2015-16 Strategic Plan and Operations

Nutrition Services Strategic Plan for 2015-16 shown on the next few page includes:

- How the Nutrition Services Leadership team currently organizes its continuous quality improvement efforts each year.
- The specific efforts planned for and implemented in 2015-16
 - \circ Items marked with a red $\sqrt{}$ have been completed.

2015-16 **NS Department Strategic Plan**

Overarching NS Dept. Mission

We support student achievement by ensuring:

- Nutritious meals that appeal to students
- A self-supporting operation
- A welcoming, safe environment for kids to eat and practice their nutrition skills
- Reliable resource for nutrition information/education

Offer the very best program (as described by Dept. Mission) we can while maintaining financial stability Financial Stability means: Income – Expenses = Small profit to save for large equipment expenses

Project Categories:

- I. Implement strategies/tools to increase student participation in school meals
- II. Implement strategies/tools to manage resources well
- III. Implement strategies/tools to improve available resources for Nutrition Information/Education
- IV.Implement New Requirements (district, local, state or federal)
- I. <u>Implement strategies/tools to increase participation/revenue</u>
 - A. Menus
 - 1. Track data re: popularity of menu items for fine tuning this year's menu and planning for next year's. $\sqrt{}$

- 2. Fine tune 2015-16 menus √
 - Incorporate new seasonal menu items, updated salad bars
 - Eliminate any unpopular items; replace with new items that have been tested.
- 3. Plan for 2016-17 menus √
 - Issue RFP for USDA Foods Processing (vendors who take USDA foods and process them into menu items, e.g. fresh apples into applesauce cups or cheese into pizza)
 - o Research new available products; Perform taste tests; estimate usage
 - Gather usage data on current products
 - o Research and review other large districts' RFPs. Borrow any good ideas.
 - Analyze and refine specifications from our 2011 RFP.

B. Marketing/Community Partnerships

- 1. Advertise new access for reduced-price eligible students to free lunch. $\sqrt{}$
- 2. Identify new community partnerships tied to strategic goals. √
 - School Food Focus National Procurement Initiative
- 3. Develop Marketing Plan for 2016-17 implementation. Various areas to include: Move to 2016-17 plan.
 - NS Website
 - NS Student Handbook
 - · Articles for publication in district and school newsletters
 - Increase media interviews/spotlights

C. Improve Meal Benefits Efficiency & Outreach

- 1. Streamline meal application processing procedures for faster approval and notification to parents. $\sqrt{}$
- 2. Increase use of electronic files to reduce printing costs and speed searches for missing applications. √
- 3. Hire additional temporary secretarial staff for faster approval and notification to parents. $\sqrt{}$
- 4. Hire Meal Benefits Specialist who is bilingual English/Spanish to improve service to Hispanic community. √
- Develop and implement Outreach Plan to Hispanic community. √
 - Work with Univision (Spanish language broadcast network) to get info out
 - Attend Kindergarten Round-up meetings
 - Work with other district departments (Title X, Migrant, Outreach) to increase visibility

II. Implement strategies/tools to manage resources well

- A. Purchase software for a new School Nutrition Services Management Information System (SNSMIS) to replace current system and vendor. Looking for a system that will be improve efficiency, have better data integrity, have expanded functionality and be fully integrated. Also, looking for a vendor that provides better customer service and more complete and helpful system documentation. In process. Responses to RFP are due 4/28/16. Implementation of the Meal Eligibility and Point-of-Service is planned for Summer 2016. Implementation of all other modules planned for late Winter/Spring, 2017.
 - 1. Develop specifications for a SNSMIS to ensure our RFP is comprehensive and exacting enough so that we get the right system to meet our needs. (Here is a link to the RFP, #16-0006:

https://www.beaverton.k12.or.us/depts/business/purchasing/Pages/default.aspx) √

- Research and review other large districts' RFPs. Borrow any good ideas.
- Analyze and refine specifications from our 2006 RFP.
- Include a rigorous evaluation procedure.
- 2. New SNSMIS to be a largely web-based solution, eliminating the need for a separate NS dept. server, and to include modules for at least the following functions: √
 - Meal Benefits Eligibility to include:
 - BSD version of On-line Meal Applications. Currently, we're using ODE's on-line meal application which cannot be downloaded into meal processing software. Thus, data must be hand entered which takes longer and increases possibility of mistakes.
 - o Ability to electronically track status of meal application.
 - o Ability to easily notify parents via e-mail of their application outcome.
 - Improved reporting capabilities to track efficiency.
 - Point-of-Service (cashier functions) to allow access to all students from each site.
 - Inventory Management to allow for a central warehouse set-up for easily tracking USDA foods inventories.
 - Production Planning & Management –that will accurately scale recipes.
 - Procurement to provide easy reporting of usage data.
 - Menu Planning/Nutritional Analysis to eliminate duplicate entry of data across modules and improve data integrity.
 - Central Office Reporting and Financial Analysis to provide improved data integrity
 - Bid Analysis –to offer the ability to easily create bid specifications and compare them to previous bids.

- Employee Time & Training Management improve the ability to track actual labor costs.
- **B.** Ensure all supplies and equipment are ordered through SNSMIS to more easily track costs. For example, switch office supply and small equipment orders to be done through SNSMIS system. In process.
- C. Staffing Ensure there are enough staff to cover all positions
 - 1. Hire staff directly into open positions vs. "trying out" substitutes. √
 - 2. Hire a temporary Roving NS Assistant to cover absences. √
 - 3. Hire more subs. √
 - 4. Track & address any attendance issues. In process.
- D. Review Staffing at all sites to Ensure Efficient Operations & Consistent Workload Across Dept.
 - 1. Fine tune "meals per labor hour" metric. In process.
 - 2. Hold staff accountable for submitting updated, detailed production schedules for each position at each site by September 25th. √
 - 3. Review production schedules for each site. √
 - a Identify any issues and prioritize √
 - 4. Perform productivity reviews at prioritized sites. In process.
 - 5. Develop and implement plans for addressing any prioritized issues. √
 - 6. Adjust staff hours as necessary. In process.

III. Implement strategies/tools to offer, reliable Nutrition Information/Education

A. Purchase SNSMIS software that will offer improved nutritional analysis function. (See II A. above) In process

IV.Implement New Initiatives/Requirements (district, local, state or federal)

- A. Implement new Oregon Farm-to-School Grant about \$125,000 to spend on foods that are grown or processed in Oregon,
 - Attend ODE mandatory training; Apply for grant √
 - 2. Find vendors that can deliver identified products through district's contracted grocery distributor or directly to sites. √

- Used Oregon Farm-to-School grant funds to subsidize purchases of foods for 2015 summer meals and 2015-16 school lunches. Included are organic apples and pears, sweet peppers, lettuce, kiwi, grapes, kale, dried cranberries. Farmers include; Bull Run Cider; Hood River Organics; Adelante Mujeres; Terra Nova Farm, Roamin Ranch Farm; Vial Family Farm. Other vendors include Truitt Brothers, (Hummus cups) Nature's Fresh (Green Chickpeas)
- 3. Gather documentation, submit claims. √

B. Implement USDA required Professional Standards training: Develop structure/system to ensure staff are trained the required number of hours and on required topics.

- Develop list of Safe Schools trainings that will be used for next year √
- Ensure that trainings match USDA approved list √
- 3. Determine timeline for 15/16 and 16/17 √
- Develop system(s) for monitoring staff compliance √
- 5. Plan for implementing 16-17 full hours' requirement (6 hours/year if ≥ 20hrs/week for NS I & II's; 10 hours/year if Lead)

C. All Day Kindergarten √

- 1. Offer Student ID/Name cards to help Kinders learn their student ID $\sqrt{}$
- 2. Contact Principals in June to offer help for September, 2015 $\sqrt{}$
- 3. Print and distribute ID/Name cards for all students to school sites that requested them. $\sqrt{}$
- 4. Mail information out to Kinder parents with practice pin pad sheet & their student's ID number $\sqrt{}$
- 5. Fine Tune staffing for sites with increased meal participation. $\sqrt{}$

D. Wellness Policy Update √

1. Complete work with Wellness Policy Committee on developing recommendations for an update to the Wellness Policy for senior leadership review and Board approval before end of school year.

E. Update Smart Snacks Info √

- Support schools' efforts to comply with new regulations. √
- 2. Revise NS a la carte list √

Five (5) Strategic Planning meetings will be planned on the following dates to review progress and adjust the plan as needed: November 12th, February 10th, April 14th, June 8th

> 2014-15 Profit/Loss, and YTD January, 2016 Profit/Loss

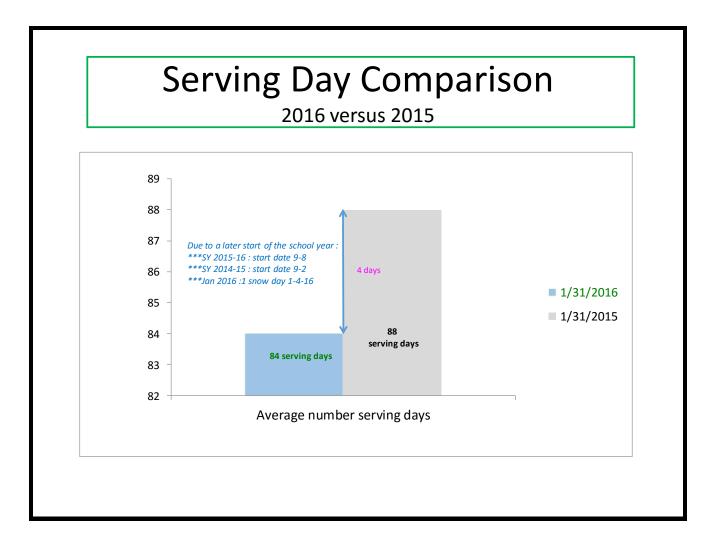
FY 2014-15 Profit/Loss

As the graph on the following page indicate, the final net profit/loss for FY2015 was (\$272,000). This loss was due to a 4.8% increase in expenses from the previous fiscal year, despite a 2.1% increase in revenue from the previous year.

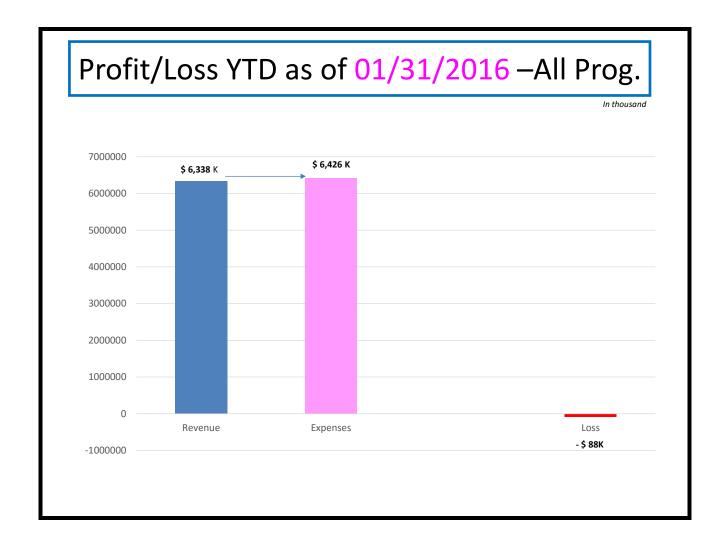
Of the 4.8% increase in expenses, 48% (\$363,000) was due to increased labor costs; 30% (\$231,000) in increased small equipment/computer replacement; 22% (\$165,000) in other supplies e.g. paper/disposables. Food costs actually decreased by 17% (\$140,000) due to menu changes, and continue to decrease due to planned menu changes.

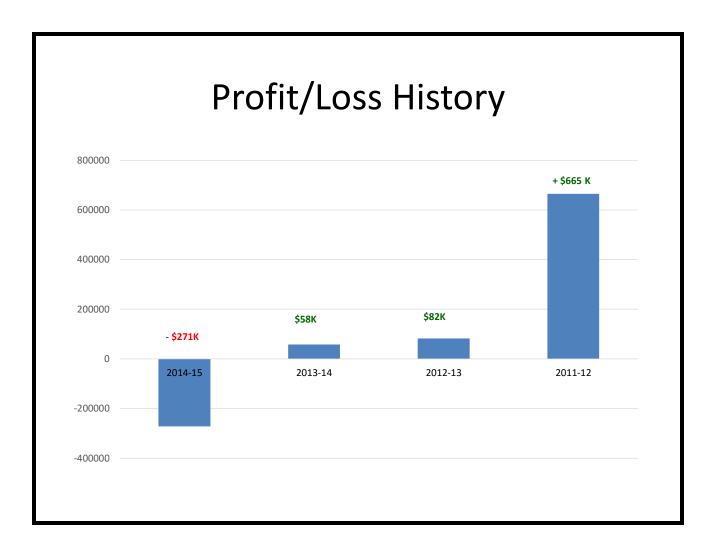
YTD January, 2016 Profit/Loss

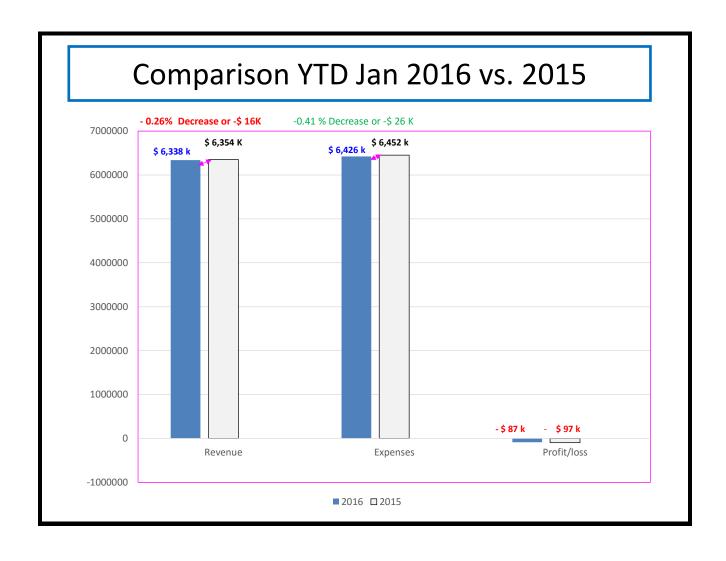
As the graphs on the following pages indicate, YTD January 31, 2016 looks a little better than YTD January 31, 2015. However, unless revenue increases significantly or expenses decline significantly, FY 2016 will also end in a loss.



Note: As this graph indicates, there is a difference between the total number of serving days as of YTD January 31, 2016 vs. YTD January 31, 2015. Subsequent graphs do not correct for this difference in number of serving days, except for the graphs showing Total Average Lunch & Total Average Breakfast Participation.



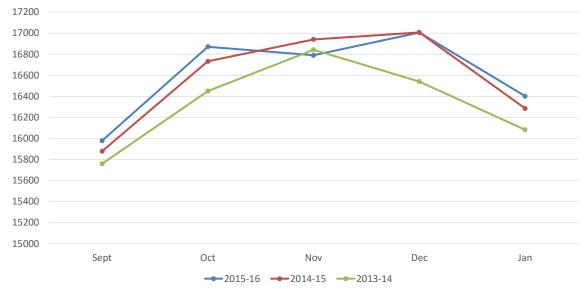




NSLP-Total Lunches claimed YTD

1-31-2016



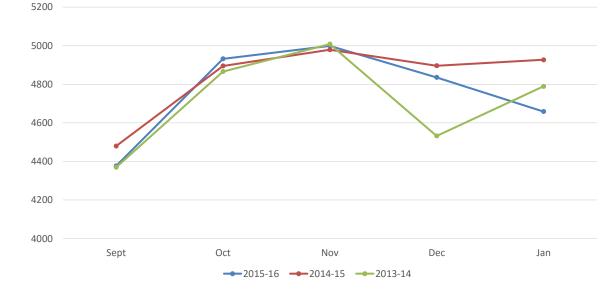


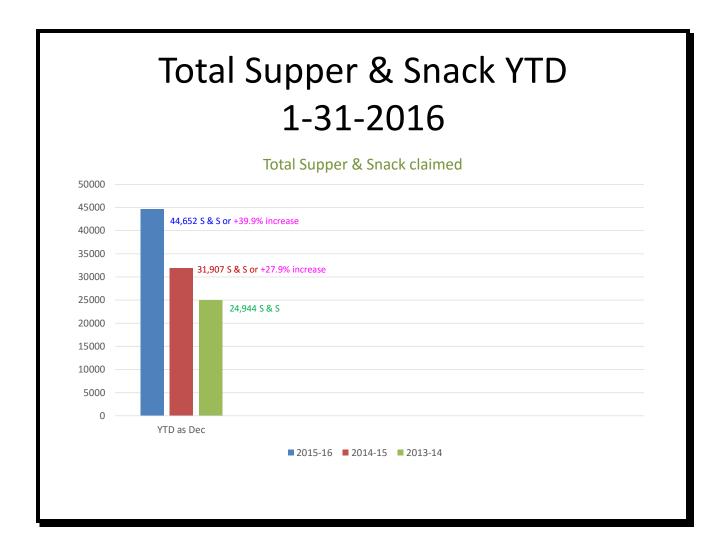
Total Breakfast claimed YTD

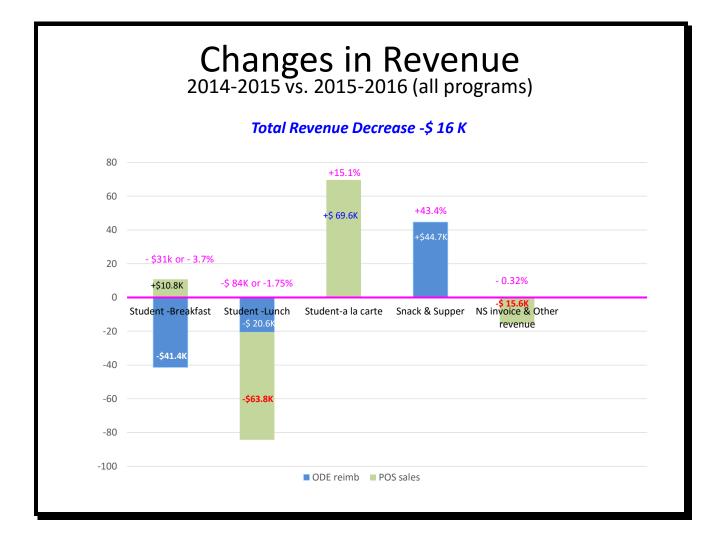
1-31-2016

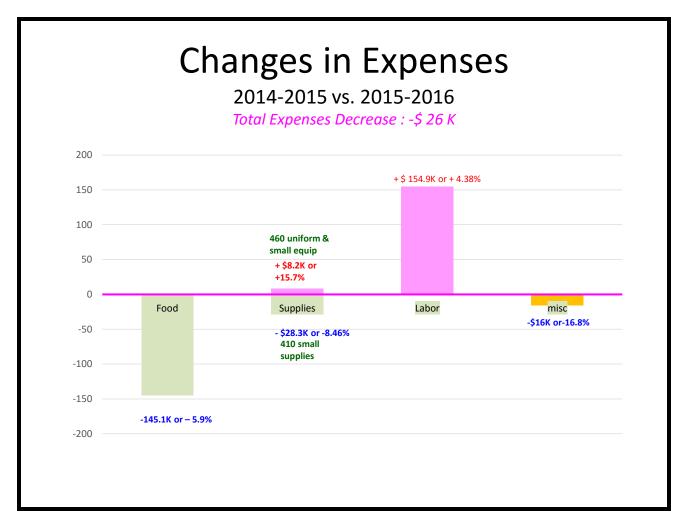
Served Breakfast Daily Average











Although NS has not increased its total number of labor hours significantly in the past 2 years, the cost of the labor has increased significantly. This is mainly due to NS covering the full cost of benefits for NS staff who have dual NS and crossing guard assignments. The cost for just the medical benefits alone for these staff members was \$414,000 in 2014-15 and will be about \$655,000 for FY2016.

➤ New Legislative Actions Affecting Child Nutrition Programs

Child Nutrition Reauthorization Legislation

2016 could prove to be an eventful federal legislative year for Child Nutrition Programs.

Background:

Although Child Nutrition Programs are federal entitlement programs, i.e. "The kind of government program that provides individuals with personal financial benefits (or sometimes special government-provided goods or services) to which an indefinite number of potential beneficiaries have a legal **right** (enforceable in court, if necessary) whenever they meet eligibility conditions that are specified by the standing law that authorizes the program.", every five years Congress takes the opportunity to review and tweak or "reauthorize" the laws governing these programs. Programs such as our district participates in: the National School Lunch Program (NSLP), School Breakfast Program (SBP), Summer Food Service Program (SFSP), Child and Adult Care Feeding Program (CACFP)-(covers after-school Suppers), the Fresh Fruit and Vegetable Program (FFVP) and the Community Eligibility Program (CEP).

The last time a **Child Nutrition Reauthorization (CNR)** occurred was in 2010 with the Healthy, Hunger-Free Kids Act, (HHFKA). This act made significant changes, (NEA summary of some of the changes:

http://www.nea.org/assets/docs/HHFKA fact_sheet-final(1).pdf) in the requirements for school meal programs. Although BSD Nutrition Services had implemented many of the meal pattern and nutrition changes 5-10 years previous to the passage of HHFKA, several of the new requirements increased the cost of providing meals to students while also having the effect of decreasing student participation in the programs. For example, implementing the requirement that students have to take a half-cup serving of fruit/vegetable with their lunch and breakfast, decreased participation, increased food waste and increased costs both at BSD and other school districts nationwide. Hopefully, as students get used to this requirement, those effects will be eliminated. Likewise, the additional requirements for documenting exactly: the amounts of food offered to students, the amounts served and the amounts leftover, increased labor and training costs while simultaneously limiting menu choices for students. No longer could we offer a made-to-order sandwich bar at the high schools because a change of one ingredient to a sandwich required separate recipes and documentation on the production records.

While the NEA summary listed above notes that the HHFKA also came with \$4.5 billion in funding over 10 years, much of this money appropriated was for USDA and state agencies to provide training to districts on how to implement the new regulations. It was not available directly to districts to cover the cost of implementing the new regulations. In fact, when the regulations were released, USDA estimated increased food and labor costs under the new rules would amount to a 10 cent increase in the cost of preparing every lunch and 27 cent increase in the cost of preparing every breakfast. Congress provided schools an additional 6 cents for each lunch served, but no extra funding for breakfast. The money that <u>was</u> earmarked for districts, (an increase in 6 cents per lunch) only ends up paying for a one quarter of one apple more to offer students.

Consequently, trying to meet the new regulations while simultaneously achieving a stable financial footing for Nutrition Services has been challenging over the past few years.

Current Reauthorization Bills/Actions:

Senate Actions:

January 20, 2016:

The *Improving Child Nutrition Integrity and Access Act of 2016* was released by the U.S. Senate Committee on Agriculture, Nutrition & Forestry, which is the Senate version of CNR. The Committee unanimously passed the bill, which awaits full Senate consideration. It includes the following changes:

- Whole Grains: "Under current regulations, all grains offered with school meals must be whole grain rich. This agreement requires 80% of the grains offered with school meals be whole grain rich, allowing schools to offer occasional servings of enriched grains." ¹
 - o BSD Comment: Although BSD NS has been serving whole grain breads and brown rice in its meals for over 10 years, switching to whole grain pasta and yakisoba noodles, both of which have a darker color, has caused students to choose pasta entrées less frequently, and we believe is a factor in decreased lunch participation. We are currently using a whole grain flour tortilla that looks like an enriched white flour

¹ School Nutrition Association's January 19, 2016 "Tuesday Morning" Newsletter

tortilla which the students have also accepted. However, the flexibility to serve enriched, white pasta in entrées would be helpful in trying to regain lost meal participation.

- Sodium: "Under the agreement, schools gain two additional years to meet Target 2 limits, which will now take effect on July 1, 2019. Starting in 2019, a study will be conducted to determine whether scientific research supports the final sodium limits (effective July 1, 2022) and whether food companies are capable of preparing foods that meet those limits. The study will also evaluate the impact of Target 2 limits on student lunch participation, food cost, safety and food service operations." ²
 - o BSD NS Comment: While we've switched to some low sodium products to try to meet the Target 1 sodium levels, effective on July 1, 2014, moving to the Target 2 levels will not only severely limit what we can offer students, but also make what we do offer extremely unpalatable.
- A la Carte: "This agreement will establish a working group to examine the impact of a la carte restrictions and recommend to USDA a list of allowable nutrient-dense food exemptions for a la carte sale." 3
 - o BSD NS Comment: Federal Smart Snacks in School regulations (effective July 1, 2014), in conjunction with state nutrition standards outlined in ORS 336.423, severely limited the items sold in at school. As a result, a la carte revenue that could have been used to offset the higher cost of meeting new regulations dropped by 20% (\$211,000) from the previous year. ORS 336.423 was amended last July which eased the restrictions, so revenue from a la carte sales is up 15% from last year (\$70,000), but it still is 10 % (\$55, 520) less than preregulation sales.
- Fruit and Vegetable Mandates: "The updated regulations required schools to offer students larger servings and a wider variety of fruits or vegetables; however, rules requiring every student to take a fruit or vegetable with every school meal has increased the amount of produce being thrown away in the cafeteria. Under the agreement, the

²,3 School Nutrition Association's January 19, 2016 "Tuesday Morning" Newsletter

Centers for Disease Control and Prevention and USDA will establish new guidance, designed for local governments, confirming the safety of and encouraging the use of salad bars and sharing tables." ⁴

o BSD NS Comment: We have salad bars in all of our schools and have had them for over 15 years. We also encourage sharing tables where students can place uneaten, wrapped items from their lunch trays for other students to take. While this works for items that are wrapped or fruits that don't have an edible skin, it doesn't decrease the waste for cut fruits or fruits like apples and pears that have edible skins. This change would have little impact on decreasing waste at BSD.

House Actions

April 7, 2016:

The House Committee on Education and the Workforce completed a discussion draft of its version of a Child Nutrition Reauthorization Bill, including the following components:

- A 2 cent increase in the reimbursement rate for school breakfast
 - BSD NS comment: Although the School Nutrition Association has lobbied for an increase of 35 cents in meal reimbursements to cover the true cost of implementing the new requirements, we're happy to receive any increase.
- A delay in implementation of forthcoming sodium limits and future limits must be based on further research.
 - o BSD NS comment: See comments above regarding the Senate proposal to delay further implementation of the new sodium targets.
- Whole grain requirements must allow for the service of cultural foods with school meals (e.g. white flour tortillas, white flour biscuits and white flour Native American "fry" bread).
 - o BSD NS comment: See comments above regarding the Senate proposal on whole grains.
- All foods served as part of reimbursable meals can be sold a la carte
 - BSD NS comment: This would be another favorable change, as there are some items like sliced baked potatoes that we cannot offer unless they have <u>no</u> added sodium in the product and offer them with only 2 teaspoons of ketchup per serving.

⁴ School Nutrition Association's January 19, 2016 "Tuesday Morning" Newsletter

Elimination of Paid Lunch Equity requirements

o BSD NS comment: This would not affect BSD either way as our Paid lunch prices are in sync with the amount of funding that we receive for free meals.

Administrative Review cycle returns to 5 years from 3 years

o BSD NS comment: We would very much welcome this change, as a significant amount of time is required to not only prepare for, but also participate in one of these audits.

USDA must periodically review and streamline program requirements

- BSD NS comment: While it's hard to tell how this might be implemented, any streamlining of requirements across child nutrition programs would be helpful. Sometimes, we have to submit the exact same data for different programs.
- Raise the threshold for participation in the Community Eligibility Provision (CEP) from 40 percent identified students to 60 percent.
 - o BSD NS comment: While this would not affect BSD since we can't afford to subsidize CEP in schools that don't have at least 60% of their students as identified, it could significantly affect other school districts with large numbers of schools that qualify for CEP currently. Since It's easier to administer benefits using one system versus two, this change might mean that districts would have to use both systems of administering benefits, (as BSD does), versus use just the CEP system for all schools.

April 12, 2016 and April 19, 2016

The Fiscal Year 2017 House Agriculture Appropriations bill was released on April 12, 2016 and was marked up by the full committee on April 19th. This one-year funding bill continues the following existing provisions:

- Whole Grains: "Allows schools demonstrating a financial hardship to seek an exemption from the whole grain nutrition standards." 5
 - o BSD NS Comment: Our current SNSMIS software makes gathering the data to prove a direct financial relationship to implementation of the whole grain pasta very difficult.

⁵ School Nutrition Association's April 19, 2016 "Tuesday Morning" Newsletter

- **Sodium** "Prevents the implementation of further sodium reduction standards until the latest scientific research establishes the reduction is beneficial for children."
 - o BSD NS Comment: See comments above re: the Senate proposal to delay further implementation of the new sodium targets.
- Funding for Equipment "Provides \$25 million for equipment purchases." 7
 - BSD NS Comment: Not sure if this would likely benefit BSD, as the need in other districts with higher percentages of free and reduced eligible students is so great that in the past, we have not been eligible for this funding.
- Funding for Study "Includes "\$1 million in funding to be used for an independent study to identify the best means of consolidating and coordinating reporting requirements under Child Nutrition Programs. The purpose of the study is to eliminate redundancy, increase efficiency and reduce the reporting burden on school food authorities and State Agencies." 8
 - o BSD NS Comment: See comment above re: the House proposal requiring USDA to streamline program requirements.

Next Steps:

Before a CNR bill can be passed the following steps must take place. However, it appears that the House plans to propose a few minor changes and delay passage of a CNR bill until 2017.

- The House Education and the Workforce Committee will schedule a markup of the House bill
- Once approved by committee, the bill will be considered by the full House.
- The Senate Committee unanimously passed the bill, which awaits full Senate consideration.
- Once the Senate and House pass their respective bills, a conference committee will be appointed to draft a compromise bill for approval by both chambers.

^{6, 7,8} School Nutrition Association's April 19, 2016 "Tuesday Morning" Newsletter

> Challenges (current and future)

- Funding to cover increased costs:
 - Labor costs in particular have been high in the past few years due to higher wage and benefit rates. As
 Oregon gradually moves to a higher minimum wage this problem will be exacerbated. Higher percentages of revenue spent on labor costs mean less to spend on both on food quality and varied menu options.
- Lack of a BSD Central Warehouse increases supply costs since vendors need to deliver to all 50 sites. It also limits our ability to work with farms and other smaller, local vendors because they often don't have the capacity to deliver to all 50 sites.
- **Grocery Distributor (Sysco) Service Level** Sysco has mismanaged our USDA Foods inventory, and continues to be a challenging vendor to work with.
- **Purchasing Dept. Capacity** Over the past several years, it's been difficult for the Purchasing Dept. to keep up with helping us issue and respond to RFPs/ITBs. This is not at all due to the fine staff who work in the department, but we feel due to a lack of staffing capacity to handle the work load.
- Meal Times The amount of time scheduled for meals greatly affects Nutrition Services ability to deliver meals
 and more importantly affects the amount of time students have to eat. This is especially concerning for lowincome students who depend on school meals for at least two-thirds of their daily nutrition. NS staff have seen
 students regularly eating some of their meals over the trash cans because they've been dismissed and don't have
 enough time to finish eating.

➤ Strategic Plan Draft for 2016-17

I. <u>Implement strategies/tools to increase participation/revenue</u>

- A. Marketing/Community Partnerships
 - 1. Develop marketing plan for 2016-17
- **B.** Ensure High Quality Food is consistently served at Lunch
 - 1. Visit sites during lunch time to determine what district-wide quality level is currently; take pictures
 - 2. Identify most common issues, (e.g. specific recipe (pizza), quality of product; staff not following recipe), then prioritize and develop plan.

II. Implement strategies/tools to manage resources well

- A. Roll-out new SNSMIS
 - 1. Meal Benefits Eligibility and Point-of-Service over summer 2016.
 - 2. Back-of-House (Inventory, Menu Planner, Procurement) during winter/spring, 2017.

III. Implement strategies/tools to improve available resources for Nutrition Education/Information

A. Update website with new information.

IV. Implement New Measures (dept., district, local, state or federal)

- **A.** Adjust operations according to any new federal, state or district requirements.
- B. Open Vose Kitchen at Timberland.
- C. Continue planning for new South Cooper Mountain HS & Vose/Kaiser K-5.
- **D.** Continue implementing USDA required Professional Standards.