This addendum to the 2018-2019 Administrative Review (AR) Manual is being issued pursuant to Memo SP 35-2019, *Administrative Review Addendum (Effective School Year 2019-2020)*, dated August 23, 2019, and highlights changes and clarifications to the AR process, based on final rules and feedback from both Food and Nutrition Service (FNS) Regional Offices and State agencies.
Section III: Meal Pattern and Nutritional Quality

Module: Meal Components and Quantities

Issue: Guidance found on page 75 of the Administrative Review Manual needs to be updated.

Response: Final rule (83 FR 63775), Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements, no longer requires SFAs to apply for exemptions to the whole-grain rich requirement. The rule changed the whole grain-rich requirement to half of the weekly grains. SFAs are considered compliant with the whole grain-rich requirements during an Administrative Review if half of the weekly grains offered are whole grain-rich. This is effective starting SY 2019-2020. See Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements

Issue: Menu Planning Worksheets - Current worksheets specify that all weekly grains must be whole grain rich. If only half of the total grains offered are whole grain-rich, a red flag will appear in the weekly report tab.

Response: Final rule (83 FR 63775) changed the regulations to require that, beginning SY 2019-2020, at least half of the weekly grains offered in NSLP and SBP must be whole grain-rich and the remaining grains must be enriched. State agencies are advised to ignore the red flag that will appear in the grain area in the weekly report tab of the Menu Planning worksheets as long as half of the weekly grains served are whole grain-rich and the remaining grains are enriched. States should also make a note as to why they ignored the flag on the comments box in the Weekly Report tab.

Issue: Guidance found on page 73 of the Administrative Review Manual regarding flavored low-fat milk needs to be updated to reflect the 2018 regulatory changes to the fluid milk provision.

Response: Final rule (83 FR 63775) codified the flexibility to offer flavored low-fat milk in schools without the need to demonstrate hardship and requires that unflavored milk be offered at each meal service. This permanent flexibility is effective starting School Year 2019-2020. The flavored milk flexibility will also apply to the Special Milk Program and Child and Adult Care Food Program for participants ages 6 and older.

Issue: Menu Planning Worksheets – Day Tab – In the Milk Type block selecting a flavored milk will raise a flag.

Response: State agencies are advised to ignore the flag when a flavored low fat/1% type of milk is selected and to make a note as to why they ignored the flag in the comment box of the Weekly Report tab. State agencies must ensure that unflavored milk is also available at each meal service.
Module: Dietary Specifications and Nutrient Analysis
Issue: Guidance found on page 103 of the Administrative Review Manual about sodium target 1 needs to be updated to reflect the 2018 regulatory changes to the sodium provision.

Response: The sentence should read, Final rule (83 FR 63775) retains Sodium Target 1 through School Year 2023-2024, moves target 2 to School Year 2024-2025 and removes final target. Memorandum SP 32-2017 citation should be removed since it is outdated. See Sodium Timeline and Limits.

Module: General Area - Professional Standards
Issue: Guidance found on page 170 of the Administrative Review Manual needs to be updated.

Response: Final rule (84 FR 6953), Hiring Flexibility Under Professional Standards, allows the State agency to apply for the optional flexibility of allowing less than the required relevant food service experience for any type of academic degree (high school diploma, an associate's degree, or a bachelor's degree) for LEAs with a student enrollment of less than 500. Language should read: “For LEA enrollments less than 500, the SA may approve the hire of a candidate with a high school diploma (or GED), an associate's degree, or a bachelor's degree and less than the required years of relevant food service experience, if the candidate is the best qualified candidate to hire.”

Additional Guidance: USDA is providing discretionary flexibility for a State agency to approve an SFA to use the nonprofit food service account to pay the salary of a School nutrition Program Director who does not meet the hiring standards so long as the SFA is complying with a State agency approved plan to ensure the director will meet the professional standards requirements.

Disclaimer: Please note that these updates and clarifications are not a comprehensive list. The updates and clarifications highlighted through AR addendum are the most significant changes. State agencies should direct any questions and concerns to their Food and Nutrition Service (FNS) Regional Office.