

# Administrative Review Report

Cambridge School District

## Commendations:

Commendations from the NPC: Thank you to the staff at Cambridge School District for the courtesies extended to everyone during the on-site review and for being available to answer questions and provide additional information. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. All were very receptive to recommendations and guidance. The food service director and food service team do a nice job of offering nutritional meals to students. It was a pleasure to work with everyone!

Commendations from the PHN: Great job having recipes on file for all menu items prepared with two or more ingredients including seasoned vegetables! All staff on-site were friendly, helpful and open to suggestions. It is evident that they all care about running the best possible program and providing appealing and nutritious options for the students at Nikolay Middle School. I enjoyed the opportunity to work with you all.

## Recommendations:

No Recommendations found for this review.

# Administrative Review Report

Cambridge School District

## Findings and Corrective Action:

|                                  |  |  |
|----------------------------------|--|--|
| <b>Form Name</b>                 | Certification and Benefit Issuance (100 - 121) |  |
| <b>Question #</b>                | 110  |  |
| <b>TA Log #</b>                  | No TA Log# found                               |  |
| <b>Due Date</b>                  | April 29, 2024                                 |  |
| <b>Corrective Action Status</b>  | Flagged  |  |
| <b>Corrective Action History</b> |  | <p>Finding: The SFA's notification letter for direct certification does not include all required information including how to notify the SFA of any additional school-aged children in the household not listed on the notification and explain how the household can decline the benefit (7 CFR 245.6). In addition, Summer EBT language is missing. It was noted that the non-discrimination statement in this letter needs to be updated to meet compliance. This same letter is also used for approval and denial of meals by application method. <b>Technical assistance was provided</b> that the school either develop two letters for direct certification and application meal benefit approval or modify the current letter to include all the requirements for both DC and application meal benefit approval notification.</p> <p>Corrective Action: Upload a corrected letter template for the direct certification notification letter that will be used. Be sure to include Summer EBT language and update the non-discrimination statement. Please upload the letter that will be used for approval and denial of meals by the application method. Be sure to include Summer EBT language and update the non-discrimination statement. If only one notification letter will be used for direct certification and applications, please upload the letter and submit a statement that only one letter will be used.</p> |
| <b>Form Name</b>                 | Revenue From Non-Program Foods (709 - 711)     |  |
| <b>Question #</b>                | 709  |  |
| <b>TA Log #</b>                  | No TA Log# found                               |  |
| <b>Due Date</b>                  | April 29, 2024                                 |  |
| <b>Corrective Action Status</b>  | Flagged  |  |
| <b>Corrective Action History</b> |  | <p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The SFA completed the Nonprogram Foods Revenue Tool but did not include all required information into the tool. Adult meals and extra milk need to be added and the bottom part of the tool needed to be completed. (7 CFR 210.14).</p> <p>Corrective Action: Update the Nonprogram Foods Revenue Tool, including all missing information and upload the updated tool into SNACS.</p>  |

# Administrative Review Report

Cambridge School District

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| <b>Form Name</b>                 | Civil Rights (800 - 807)                       |   |
| <b>Question #</b>                | 803  |   |
| <b>TA Log #</b>                  | No TA Log# found                               |   |
| <b>Due Date</b>                  | April 29, 2024                                 |   |
| <b>Corrective Action Status</b>  | Flagged  |   |
| <b>Corrective Action History</b> |  | <p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>Corrective Action: Utilizing the <a href="#">DPI template policy</a>, develop procedures for the SFA and upload into SNACS.</p>   |
| <b>Form Name</b>                 | Local School Wellness (1000 - 1006)            |   |
| <b>Question #</b>                | 1000   |   |
| <b>TA Log #</b>                  | No TA Log# found                               |   |
| <b>Due Date</b>                  | April 29, 2024                                 |   |
| <b>Corrective Action Status</b>  | Flagged  |   |
| <b>Corrective Action History</b> |  | <p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). The checklist was shared with the FSD as to what is missing.</p> <p>Corrective Action: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p> |
| <b>Form Name</b>                 | Local School Wellness (1000 - 1006)            |   |
| <b>Question #</b>                | 1005   |   |
| <b>TA Log #</b>                  | No TA Log# found                               |   |
| <b>Due Date</b>                  | April 29, 2024                                 |   |
| <b>Corrective Action Status</b>  | Flagged  |   |
| <b>Corrective Action History</b> |  | <p>Finding: SFA has completed a triennial assessment of the Local Wellness Policy (LWP) but did not complete both the LWP Report Card and the WellSAT 3.0 to meet this requirement.</p> <p>Corrective Action: Complete the <a href="#">LWP Report Card</a> of the Local Wellness Policy assessment and upload into SNACS.</p>   |
| <b>Form Name</b>                 | Certification and Benefit Issuance (124 - 142) |   |
| <b>Question #</b>                | 136  |   |
| <b>TA Log #</b>                  | No TA Log# found                               |   |
| <b>Due Date</b>                  |  |   |
| <b>Corrective Action Status</b>  | Flagged  |   |

# Administrative Review Report

Cambridge School District

|                           |  |   |
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| Corrective Action History |  | <p>Finding: The SFA has a <i>Sharing of Information</i> form/letter in a paper format and online. It was noted that fee waivers listed on this form are not broken individually. <b>Technical assistance was provided.</b></p> <p>Corrective Action: Update the <i>Sharing of Information</i> form/letter to show that fee waivers are broken out individually for both paper and online form/letter.</p>   |
| Form Name                 | Meal Counting and Claiming (314 - 316)   |   |
| Question #                | 314                                      |   |
| TA Log #                  | No TA Log# found                         |   |
| Due Date                  | April 29, 2024                           |   |
| Corrective Action Status  | Flagged                                  |   |
| Corrective Action History |  | <p>Finding: SFA is not following the current approved contract for POS at the middle school for breakfast.</p> <p>Corrective Action: Update the online contract and submit for approval.</p>  |
| Form Name                 | Civil Rights (809 - 810)                 |   |
| Question #                | 810                                      |   |
| TA Log #                  | No TA Log# found                         |   |
| Due Date                  | April 29, 2024                           |   |
| Corrective Action Status  | Flagged                                  |   |
| Corrective Action History |  | <p>Finding: The non-discrimination statement on the food service webpage for middle school was not the most current statement. It was noted there were several other webpages where the non-discrimination statement was listed where food service was referenced so an updated is needed also for these pages.</p> <p>Corrective Action: Update the <a href="#">Nondiscrimination Statement</a> on the middle school food service webpage and all other pages where it is listed. Upload a copy of the non-discrimination statement that will be used for these pages. Provide a link to the updated non-discrimination statement for the middle school webpage.</p> |
| Form Name                 | Food Safety & Buy American (1400 - 1403) |   |
| Question #                | 1403                                     |   |
| TA Log #                  | No TA Log# found                         |   |
| Due Date                  | April 29, 2024                           |   |
| Corrective Action Status  | Flagged                                  |   |
| Corrective Action History |  | <p>Finding: Frozen cauliflower from Mexico was found in the SFA's freezer and no Buy American exception documentation was on file for this product.</p>   |

# Administrative Review Report

Cambridge School District

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|                                  |   | <p>Corrective action: Complete and submit a Noncompliant Product List from for the cauliflower. As a reminder, if there is no country of origin labeling on the product packaging, check the distributor's database or contact the manufacturer to determine an accurate country of origin. Additionally, there is an option to use the <a href="#">Noncompliant Product List - Multiple</a> to track all products in one spreadsheet rather than having a separate paper for each product if that is easier for this operation.</p>     |
| <b>Site Name</b>                 | Nikolay Mid   |  |
| <b>Form Name</b>                 | Meal Counting and Claiming - Review Period (322-325)              |  |
| <b>Question #</b>                | 325   |  |
| <b>TA Log #</b>                  | No TA Log# found  |  |
| <b>Due Date</b>                  | April 29, 2024  |  |
| <b>Corrective Action Status</b>  | Flagged   |  |
| <b>Corrective Action History</b> |   | <p>Finding: Meal counts by eligibility category were not correctly reported on the monthly claim. The numbers for two schools were entered incorrectly. The numbers for middle school were entered for Koshkonong Trails school. Numbers for Koshkonong Trails school were entered for middle school. This issue also occurred with the November claim.</p> <p>Corrective Action: The claims were amended to show correct numbers for the correct school. Provide a statement on how this issue will be corrected for future claims.</p> |
| <b>Site Name</b>                 | Nikolay Mid   |  |
| <b>Form Name</b>                 | Meal Components and Quantities - Review Period (409-412, 430-437) |  |
| <b>Question #</b>                | 409   |  |
| <b>TA Log #</b>                  | No TA Log# found  |  |
| <b>Due Date</b>                  | April 29, 2024  |  |
| <b>Corrective Action Status</b>  | Flagged   |  |
| <b>Corrective Action History</b> |   | <p>Finding: For the week of review, broccoli was planned as the dark green vegetable on Thursday, January 25. However, according to the production records, green beans were served in place of broccoli on this day. Additionally, green bell peppers were incorrectly documented as dark green vegetables on the garden bar for the week of review. As neither green beans nor green bell peppers contribute towards the dark green vegetable subgroup, the dark green subgroup was missing for the week of January 22, 2024.</p>      |

# Administrative Review Report

Cambridge School District

|                           |  |
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|                           | <p>Corrective action:<br/>Submit a statement describing the plan that will be implemented to ensure that menu substitutions do not result in vegetable subgroup shortages going forward.</p> <p><b>Fiscal action</b> is required for a repeat vegetable subgroup shortages. During the previous Administrative Review, a red/orange vegetable subgroup shortage was found. <b>Therefore, fiscal action will be assessed on Friday 1/26/24, the day during the week of review with the lowest participation. 126 lunch meals</b> will be reclaimed at Nikolay Middle.</p>   |
| Site Name                 | Nikolay Mid  |
| Form Name                 | Meal Components and Quantities - Review Period (409-412, 430-437)  |
| Question #                | 410  |
| TA Log #                  | No TA Log# found   |
| Due Date                  | April 29, 2024   |
| Corrective Action Status  | Flagged  |
| Corrective Action History | <p>Finding: Prior to the AR, no breakfast menu was available and breakfast kits were documented on the production record without specifying variety. This was discussed and new production records were implemented starting Feb. 1. However, there is still not complete documentation to show the specific items contained within each breakfast kit option.</p> <p>Corrective action: Either develop a recipe for each breakfast kit variety offered or provide documentation from the manufacturer/distributor specifying each item contained within each of the breakfast kits offered.</p> <p>A breakfast menu should be developed, or at a minimum, breakfast offerings should be included on the lunch menu. Upload a copy of the menu showing breakfast options in SNACS.</p> |
| Site Name                 | Nikolay Mid  |
| Form Name                 | Meal Components and Quantities - Review Period (409-412, 430-437)  |
| Question #                | 435  |
| TA Log #                  | No TA Log# found   |
| Due Date                  | April 29, 2024   |
| Corrective Action Status  | Flagged  |
| Corrective Action History | <p>Some of the recipes provided did not include the actual products being used in this operation or did not have an accurate yield. It is important that there is a system in place for reviewing any recipes used to ensure that the ingredients and processes match what is being done on site. These are crucial steps in the recipe standardization process.</p>   |

# Administrative Review Report

Cambridge School District

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|                                  |                                    | <p>As a reminder, the definition of a standardized recipe is one that, “has been tried, adapted, and retried several times for use by a given foodservice operation and has been found to produce the same good results and yield every time when the exact procedures are used with the same type of equipment and the same quantity and quality of ingredients,” according to the U.S. Department of Agriculture (USDA).</p> <p>Finding: The recipe provided for the chicken alfredo indicates that it yields 35 - 1/2 cup servings when combining 10lbs of diced chicken and 10 lbs of alfredo sauce.</p> <p>The recipe for the sloppy joe includes an incorrect beef crumbles product. Additionally, the planned servings size is 2.5oz, but when the planned scoop was weighed prior to service, it was found to provide over 4oz of sloppy joe mixture.</p> <p>Corrective action: Standardize the chicken alfredo and sloppy joe recipes. Ensure that the recipes list the correct items, and the recipes yields and serving sizes have been verified. The <a href="#">USDA Recipe Standardization Guide</a> or the <a href="#">Minnesota Dept of Education Standardized Recipe Guide</a> may be useful resources in this process.</p> |
| <b>Site Name</b>                 | Nikolay Mid                        |  |
| <b>Form Name</b>                 | SFA On-Site Monitoring (901 - 904) |  |
| <b>Question #</b>                | 901                                |  |
| <b>TA Log #</b>                  | No TA Log# found                   |  |
| <b>Due Date</b>                  | April 29, 2024                     |  |
| <b>Corrective Action Status</b>  | Flagged                            |  |
| <b>Corrective Action History</b> |                                    | <p>Finding: The SFA did not meet on-site monitoring requirements per 7 CFR 210.8 prior to February 1. Onsite monitoring was conducted after February 1.</p> <p>Corrective Action: Provide a statement of understanding that on-site monitoring is required to be completed prior to February 1 and include the position responsible for completing this.</p>   |
| <b>Site Name</b>                 | Nikolay Mid                        |  |
| <b>Form Name</b>                 | Smart Snacks (1104 - 1107)         |  |
| <b>Question #</b>                | 1106                               |  |
| <b>TA Log #</b>                  | No TA Log# found                   |  |
| <b>Due Date</b>                  | April 29, 2024                     |  |
| <b>Corrective Action Status</b>  | Flagged                            |  |

# Administrative Review Report

Cambridge School District

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| <p><b>Corrective Action History</b></p> | <p>It is the responsibility of the SFA to track any fundraiser selling food to students on the school campus, during the school day (defined as midnight through 30 minutes after the end of the instructional day) and ensure compliance with state and federal regulations. This simply means keeping a list of each student organization that has a food/beverage fundraiser, noting the length of time and location of the fundraiser, ensuring that no organization has more than two exempt fundraisers, and ensuring that each exempt fundraiser is not more than two consecutive weeks. <a href="#">Tracking templates</a> are available on the <a href="#">Smart Snacks webpage</a> (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks">https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks</a>).</p> <p>If an organization is selling foods or beverages that meet the Smart Snacks standards, these foods or beverages may be sold at any time and in any location. The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator.</p> <p>If an organization is selling foods or beverages that do not meet the Smart Snacks standards, these are considered exempt fundraisers. Each student organization may hold up to two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length. Exempt fundraisers cannot occur in the meal service area during mealtimes. Someone in the school must keep track of the exempt fundraisers. This is often the responsibility of a principal, secretary, or someone in administration rather than the Food Service Department.</p> <p>Finding: A candy gram fundraiser occurred, but no tracking documentation was provided.</p> <p>Corrective Action: Submit a statement indicating who is responsible for tracking fundraisers involving food sales and submit a tracking form (such as the one available on our website) that includes the candy gram sale that occurred. The tracking form should document the date/s, length of time, location in the school, items for sale and the organization benefitting from the fundraiser.</p> |
| <p><b>Site Name</b></p>                 | <p>Nikolay Mid</p>   |
| <p><b>Form Name</b></p>                 | <p>Food Safety, Storage and Buy American (1404-1411)</p>   |
| <p><b>Question #</b></p>                | <p>1407</p>  |
| <p><b>TA Log #</b></p>                  | <p>No TA Log# found</p>  |
| <p><b>Due Date</b></p>                  | <p>April 29, 2024</p>  |



# Administrative Review Report

Cambridge School District

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| <b>Corrective Action Status</b>  | Flagged   |  |  |  |  |  |  |  |
| <b>Corrective Action History</b> | <p>Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that would require an SOP for milk being held out of mechanical refrigeration at breakfast-on-breakfast cart in cafeteria.</p> <p>Corrective Action: Create SOP using either <a href="https://theicn.org/resources/181/food-safety-standard-operating-procedures/105737/using-time-alone-as-a-public-health-control-to-limit-bacteria-growth-in-time-temperature-control-for-safe-foods.docx">https://theicn.org/resources/181/food-safety-standard-operating-procedures/105737/using-time-alone-as-a-public-health-control-to-limit-bacteria-growth-in-time-temperature-control-for-safe-foods.docx</a> OR <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-bag-temperature.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-bag-temperature.docx</a> so that it aligns with actual practices. Submit a copy of the updated SOP to SNACS.</p> |  |  |  |  |  |  |  |

## Technical Assistance Entries:

| TA Date    | TA Log # | Question # | TA Area               | Site | SFA Contact | Email | Phone | User Name |
|------------|----------|------------|-----------------------|------|-------------|-------|-------|-----------|
| 02/22/2024 | 4460     |            | Administrative Review |      | FSD         |       |       |           |

Overall, production records are well done. However, some recommended tweaks were discussed on-site to ensure compliance with all [production record requirements](#) as well as improve accuracy in some areas.

1. The planned portion size should be documented rather than the serving utensil to be used. If the serving utensil (ex. #8 scoop) is helpful, then feel free to document that in addition to the planned portion size (1/2 cup)
2. Both the planned number of servings and the actual number of serving prepared should be documented in the same column as "planned #/actual #" (ex. 18/28). If the planned and actual are the same, then only one number needs to be recorded in this column. Note that the planned number of servings can take into consider offer versus serve - so if you don't anticipate every student taking a serving of corn, you don't need to plan 1 serving for each student.
3. The planned/actual quantity in bulk units should reflect the quantity (#10 cans, pounds, cases, etc.) needed for the planned/actual number of servings.
4. It may be helpful for forecasting to have a separate column to help track a la carte/second entrees separately.
5. Be more specific when recording menu items on the production record. When possible, record brand and product number, recipe number or additional description about the menu item (ex. canned, frozen, fresh, etc.).
6. If a variety of items is offered, each different item should be recorded on a separate line and have information to meet all production record requirements (ex. raisins and craisins). Ensure that the staff at the point of service know how items credit each day and are able to determine if students have selected a reimbursable meal.

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| 02/22/2024 | 4459 |  | Administrative Review |  | FSD |  |  |  |
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The CN label provided for the chicken nuggets used as part of the Asian Chicken Rice bowl indicated that 6 nuggets credited as 2 oz eq meat/meat alternate (m/ma) and 1 oz eq grain. However, per the production record, the planned portion size was 5 nuggets which would therefore credit as 1.5 oz eq m/ma and 0.75 oz eq grain. As this was served with 1/2 cup of rice, there was no issue with meeting daily meal pattern requirements for m/ma or grain for the 6-8 grade students. However, it is important to have accurate crediting to ensure reimbursable meals are selected with offer versus serve and avoid daily meal pattern shortages for 9-12 students.

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| 02/22/2024 | 4458 |  | Administrative Review |  | FSD |  |  |  |
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As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). Spoodles, which are used to measure volume, are often referred to as a "4 oz spoodle" for example. A 4 oz or 1/2 cup spoodle is actually 4 fluid oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between 1/2 cup of popped popcorn vs. 1/2 cup of peas). Be sure that this is clear and done correctly when completing planned serving sizes on your production records. It is recommended that all staff review the 7 minute Weight versus Volume training available in the School Nutrition Online Learning Library (<https://media.dpi.wi.gov/school-nutrition/weight-versus-volume/story.html>).

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| 02/22/2024 | 4457 |  | Administrative Review |  | FSD |  |  |  |
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# Administrative Review Report

Cambridge School District

|  |      |      |                       |             |     |  |  |                |
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| Extra items such as cottage cheese, croutons, shredded cheese and bacon bits are offered as part of the garden bar. These foods are not planned to credit toward the meal pattern requirements but must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). While offering extra, non-creditable items on occasion is allowable and can be an incentive for program participation, staying within the dietary specification limits can be very difficult when extras are frequently served. Based on on-site observation and review of production records, selection of these items by students is not excessive.  |      |      |                       |             |     |  |  |                |
| 02/22/2024   | 4456 |      | Administrative Review |             | FSD |  |  |                |
| In-house yield studies may be used to credit foods towards meal pattern requirements, such as determining the number of baby carrots needed to credit as 1/4 cup of vegetable. Original documentation of procedures used to determine yield must be completed and maintained. While the SFA has determined the number of pieces of various fruits and vegetables needed to credit as 1/4 cup, documentation was not maintained. <a href="#">In-House Yield Study Procedures</a> and <a href="#">templates</a> are available on the <a href="#">Menu Planning webpage</a> , under the Crediting tab ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning</a> ).  |      |      |                       |             |     |  |  |                |
| 02/22/2024   | 4324 |      | Administrative Review |             | FSD |  |  |                |
| 811 - And Justice for All Poster Displaying the 2019 version of the poste is allowable and should not be a finding in Civil Rights for the poster. However, if an SFA chooses to print posters, they may print the 2022 version of the poster. Please note, the poster will be displayed with "FNS USE ONLY" across the top. The following link is to the correct 2022 version for SFA use ( <a href="https://fns-prod.azureedge.us/sites/default/files/resource-files/ajfa-green-030223.pdf">https://fns-prod.azureedge.us/sites/default/files/resource-files/ajfa-green-030223.pdf</a> ). The "FNS USE ONLY" is meant to convey that the poster is for State/Local Agencies that operate FNS Programs (as opposed to other USDA Programs). Should a state/local agency/provider choose to print posters, FNS does not recommend mass printing. Rather, only print what is needed at the time. Posters must be printed in color in the required 11x17 size and 14 point if States have the capability to do so. |      |      |                       |             |     |  |  |                |
| 02/22/2024   | 4323 | 321  | Administrative Review | Nikolay Mid | FSD |  |  |                |
| Claiming more than one breakfast per student per day The SFA is claiming more than one breakfast per student per day. 7 CFR 220.9 allows the claiming of more than one breakfast per student per day: "In recognition of the fluctuation in participation levels which makes it difficult to precisely estimate the number of breakfasts needed and to reduce the resultant waste, any excess breakfasts that are prepared may be served to eligible children and may be claimed for reimbursement unless the State agency, or FNSRO where applicable, determines that the School Food Authority has failed to plan and prepare breakfasts with the objective of providing one breakfast per child per day. In no event shall the School Food Authority claim reimbursement for free and reduced-price breakfasts in excess of the number of children approved for free and reduced price meals."  |      |      |                       |             |     |  |  |                |
| 02/22/2024   | 4322 | 1400 | Administrative Review | ALL         | FSD |  |  | Karen Jardaneh |
| All food service employees must have a signed Employee Reporting Agreement on file. The agreement helps ensure employees properly notify the person in charge when they experience specific illness symptoms or diagnoses. It is recommended that the FSD have a copy of own employee reporting agreement in each site's food safety plan. There are no requirements as to how frequently food service employees must sign an Employee Reporting Agreement form. It is best practice for each food service employee to annually review and sign an updated agreement to reinforce food safety reporting information.   |      |      |                       |             |     |  |  |                |