TO: Child and Adult Care Food Program Institutions

FROM: Marla J. Moss, Director
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SUBJECT: The Use of Share Tables in Child Nutrition Programs

Using “share tables” is an innovative strategy to encourage the consumption of nutritious foods and reduce food waste in the National School Lunch Program (NSLP), School Breakfast Program (SBP), Child and Adult Care Food Program (CACFP), and Summer Food Service Program (SFSP). This memorandum provides a reminder of the opportunities presented by share tables, extends the use of share tables to the at-risk afterschool component of the CACFP, and gives an overview of the food safety requirements Child Nutrition Program (CNP) operators must follow when choosing to include share tables in their meal service. CNP operators include school food authorities, local educational agencies (LEAs), CACFP institutions, and SFSP sponsors.

Share Table Overview

FNS regulations require participating schools, CACFP institutions, and SFSP sponsors to provide reimbursable meals that meet specific meal pattern requirements outlined in 7 CFR 210.10, 220.8, 226.20, and 225.16, respectively. However, FNS recognizes that, for various reasons, children may not always want to consume certain food or beverage items included in their meal. “Share tables” are tables or stations where children may return whole food or beverage items they choose not to eat, if it is in compliance with local and state health and food safety codes. These food and beverage items are then available to other children who may want additional servings.

Share tables allow food or beverage items to be reused in a number of ways, depending on the Program’s preference:

- Children may take an additional helping of a food or beverage item from the share table at no cost
- Food or beverage items left on the share table may be served and claimed for reimbursement during another meal service (i.e., during an afterschool program when leftover from a school lunch)
• Food or beverage items may be donated to a non-profit organization, such as a community food bank, homeless shelter, or other non-profit charitable organization (see SP 11-2012, CACFP 05-2012, SFSP 07-2012, *Guidance on the Food Donation Program in Child Nutrition Programs*, http://www.fns.usda.gov/sites/default/files/SP11_CACFP05_SFSP07-2012os.pdf).

FNS Instruction 786-6 (Instruction) provides FNS the authority to allow the use of share tables and the recycling of food and beverage items in CNPs. The Instruction allows milk (when the milk carton is unopened and the proper temperature is maintained) and other meal components that are served to be retrieved for re-service if such a practice is permitted under local and state health and food safety codes. The Instruction also states that food or beverage items should only be reused in situations where it is necessary to prevent food waste. It is important to note that when using a share table, CNP operators are able to claim the reimbursable meal at the point of service even if a child then puts one or more of the meal components on the share table. When food items are left on the share table at the end of the meal service, that food can be used in later meals that are claimed for reimbursement. As a reminder, all CNP operators must plan, prepare, and order food with the goal of providing one meal per child at each meal service. If a school, CACFP institution, or SFSP sponsor has leftover or unusable foods on a frequent basis, menu planning and production practices should be adjusted to reduce leftovers or unusable foods.

CNP operators should take steps to encourage consumption of the meal, including preparing appealing meals and serving them in a convenient manner. For example, CNP operators are encouraged to promote meal consumption by including an option of cut up whole fruit to make it easier to eat, and engaging children through taste tests, student advisory committees, and nutrition education. These practices help ensure children get the most out of the food assistance programs.

**Food Safety Requirements for Share Tables**

As with all foods and beverages prepared for the NSLP, SBP, CACFP, and SFSP, CNP operators choosing to use share tables must follow the food safety requirements outlined in 7 CFR 210.13, 220.7, 226.20(l), and 225.16(a), respectively. In addition, CNP operators must be aware of all applicable local and state health and food safety codes to ensure their use of share tables does not violate any of those codes. It is important to keep in mind that local and state health and food safety codes may be more restrictive than the FNS requirements, or may place specific limitations on which food or beverage items may be reused. To ensure compliance with food safety requirements, CNP operators should discuss plans for a share table with their local health department and state agency prior to implementation. Further, schools must ensure that their policies for saving and sharing food or beverage items are consistent with the LEA’s Hazard Analysis and Critical Control Point (HACCP) plan.

Please see section 3-306.14 of the *2013 Food and Drug Administration (FDA) Food Code* (http://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/) for more information about food safety considerations when re-serving food. In addition, see the attachment for a list of food safety requirements and other best practices to consider when establishing a share table.
Other Strategies to Reduce Food Waste

FNS has additional resources available to program operators interested in reducing food waste in the CNPs:

- Join the Food Waste Challenge (http://www.usda.gov/oce/foodwaste/join.htm)
- The Smarter Lunchroom Movement (http://smarterlunchrooms.org/)
- SP 41-2014, Clarification of the Policy on Food Consumption Outside of Foodservice Area (http://www.fns.usda.gov/sites/default/files/SP41-2014os.pdf)

For questions regarding this memorandum, contact the Child and Adult Care Food Program at 517-373-7391.

Attachment
Attachment: Share Tables Food Safety Requirements and Other Best Practices

This resource provides a list of food safety requirements and other best practices to consider when establishing a share table.

Step 1 (REQUIRED): Follow federal, state, and local health and food safety requirements:

- Comply with FNS food safety requirements outlined in 7 CFR 210.13, 226.20(l), and 225.16(a).
- Comply with all local and state health and food safety codes, including storage of reused items.
- Schools only: Ensure policies for saving and sharing food or beverage items are consistent with the local educational agency’s Hazard Analysis and Critical Control Point (HACCP) plan.

Step 2: Establish clear guidelines for food components that may and may not be shared or reused as part of a later reimbursable meal:

- **Food components FNS recommends sharing:**
  - Unopened pre-packaged items, such as a bag of baby carrots or sliced apples stored in a cooling bin.
  - Whole pieces of fruit, such as apples or bananas.
  - Unopened milk, if immediately stored in a cooling bin maintained at 41°F or below.

- **Food components FNS does not recommend sharing:**
  - Unpackaged items, such as a salad bowl without a lid.
  - Packaged items that can be opened and resealed.
  - Open items, such as an opened bag of baby carrots or sliced apples.
  - Perishable foods, when a temperature control mechanism is not in place.

Step 3: If sharing items that require cooling is permissible under local and state laws, establish strict food safety guidelines to prevent the risk of foodborne illness:

- Maintain proper temperature (and temperature logs) (41 degrees Fahrenheit or colder) by storing food components in a temperature controlled storage bin, such as an ice tub or cooler.
- Make note of expiration dates on packaged foods, and do not intermix reused items with items that have not yet been prepared and served yet.
- Decide how many times a food item can be re-used (recommended just once).

Step 4: Supervise the share table at all times to ensure compliance with food safety requirements:

- Ask supervisors to make sure packaging of items placed on the share table is not open, punctured, or otherwise compromised.
- If cooling bins are used, have supervisors monitor the bin to ensure that time and temperature control requirements are met.
- Invite children to participate as “share table helpers,” or assistant monitors, teaching them about the importance of food safety and recycling.
Step 5: Promote the share table to children and families:

- Provide children and families with information about share table guidelines.
- Ask for input from parents and guardians, and make sure families are comfortable with their children participating in the share table option.
- Explain the share table concept to children, taking care to emphasize the importance of healthy eating and trying new foods whenever possible.
- Display signage outlining share table “rules” and encouraging recycling.