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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF AGRICULTURE
AND RURAL DEVELOPMENT

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DIRECTOR

DATE: July 20, 2017

TO: All Local Health Departments (LHDs)
Attn: Medical Director / Health Officer / Director of Environmental Health
Michigan Department of Agriculture and Rural Development (MDARD)
Attn: Food and Dairy Division Managers

FROM: Sean P. Dunleavy
Quality Assurance and Emergency Response Unit
Food and Dairy Division

SUBJECT: School Food Program Share Tables-USDA Guidelines and Application of Food Code

This memo replaces the MDARD memo dated September 7, 2012 titled "School Food Program Share Tables".

This memo provides clarification regarding "share tables" as addressed in the United States Department of Agriculture (USDA) memo titled "The Use of Share Tables in Child Nutrition Programs" dated June 22, 2016. This guide states that "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. The Michigan Food Law does not prohibit the sharing or giving of food. However, the use of "share tables" by school food programs and the application of the Food Code depends upon how "share tables" are being utilized by the school food program.

If whole food or beverage items served by the school are placed upon "share tables" by students for other students to pick up and consume and any remaining food left on "share tables" is discarded by the end of the meal period this is considered direct sharing of food between individuals and Food Code provisions are not applicable to the use of the "share table".

If whole food or beverage items served by the school are placed upon "share tables" by students and the school food program collects any remaining food left on "share tables" at the end of any meal period with the intention to reserve this food during another meal period or donate it to a non-profit charitable organization, this is considered "re-service" of food as defined in the Food Code. If the school food program intends to "re-service" this food they would need to abide by Food Code §3-306.14(B)(1) or (2) which stipulates that only non-TCS food that is whole, in sound condition and in the unopened original package may be reserved. Foods that can be reserved include fruits or vegetables that need peeling before eating, apples that have been wrapped before serving and that have not been un-wrapped by the student before placing on "share tables", pre-wrapped or commercially packaged non-TCS foods such as crackers or cut fruits/vegetables. Foods that cannot be reserved include any TCS food, such as milk or yogurt. This is prohibited by the Food Code and these foods would need to be discarded by the end of the meal period. If a school food program wishes to "re-service" TCS foods placed upon "share tables", the school must first submit and be approved for a variance by the Local Health Department for Food Code §3-306.14(B).

The MDARD recommends "share tables" be located in an area in which school food program personnel can monitor to ensure that only appropriate whole food and beverage items are placed upon the table.