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DEPARTMENT OF EDUCATION
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FOOD SERVICE

**ADMINISTRATIVE POLICY No. 16
SCHOOL YEAR 2014-2015**

SUBJECT: School Food Program Share Tables – Best Practices When Implementing a Share Table

DATE: February 23, 2015

The Michigan Department of Agriculture and Rural Development (MDARD) issued a [memo](#)ⁱ on September 7, 2012, regarding the use of share tables in school meal programs. This practice allows food to be shared between students once it has been served. Per this memo, the Michigan Food Law does not prohibit the sharing or giving of food. The Michigan Modified 2009 Food Code allows a food that is not time/temperature control for safety (TCS) to be re-served from one consumer to another under certain conditions. Foods that are TCS and re-served from a share table (e.g. milk) using [time as a public control](#)ⁱⁱ would need a written procedure approved by the local health department. The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) encourages share tables as a means of reducing potential food waste and encouraging consumption of healthy school meals. Providing additional guidance, the USDA has issued two memos that address share tables and consumption of food outside of the foodservice area:

[SP 08-2014, SFSP 08-2014: Meal Service Requirements \(issued November 12, 2013\)](#)ⁱⁱⁱ

[SP 41-2014: Clarification of the Policy on Food Consumption Outside of Foodservice Area, and the Whole Grain-Rich Requirement \(issued April 23, 2014\)](#)^{iv}

It is a local decision to implement a share table and certain safeguards/best practices need to be in place to ensure the safety of the students. The Michigan Department of Education (MDE) recommends that if there are any questions about an School Food Authority (SFA) share table practice, the local health department should be consulted.

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Because the implementation of share tables is becoming a common practice, the MDE's School Nutrition Programs unit is providing the following suggested best practices:

- Consider implementing Offer Versus Serve (OVS) if not already doing so. OVS is a provision with two major goals: 1) reducing plate waste in the School Nutrition Programs, and 2) permitting students to select only the foods they want to consume. Note: OVS is required for lunch at the high school level; it is optional for all other grade levels. OVS is optional at breakfast for all grade levels.
- No food or beverage may ever be returned to the food preparation, food service, or food storage areas for use by the foodservice operation or for any human consumption.
- Time/temperature controlled for safety (TCS) foods or beverages are consumed or discarded as per approved procedures from the local health department.
- The share table is supervised by a member of the foodservice staff to ensure that no food, beverage, or condiment has been contaminated (e.g., opened, partially consumed, etc.) and the original packaging is maintained in sound condition.
- Place the share table at the end of a serving line, rather than further out in a cafeteria or eating area. This aids in the supervision of the share table by foodservice staff, ensuring that food contamination is reduced or eliminated.
- Allow only foods that are pre-wrapped or commercially packaged. Whole uncut fresh fruits and vegetables that will not be peeled prior to consumption need to be wrapped.
- Ensure that there will be no re-servicing of served, unwanted food items. Items from the share table should be discarded each day at the end of the last meal service.
- Items on the share table will be displayed on a separate cart or table and not co-mingled with menu items or condiments for the regular meal menu.
- Display signage to ensure students understand that items on the share table are not part of the menu and are optional items that can be taken in addition to the regular meal.
- Standard Operating Procedures (SOPs) need to be incorporated into the school's food safety plan based on Hazard Analysis Critical and Control Point (HACCP) principles, which describe the temperature/food monitoring, supervision, and discard plan to ensure food is safe if shared among the students.

Note:

Program operators should be aware of all state and local food safety regulations to ensure that their policies for saving or sharing food are consistent with these standards, as well as their own HACCP plans and SOPs.

Under no circumstances may food that is sold in the National School Lunch Program be resold again. Therefore, food items left on a share table may not be taken back into a production area and used as part of a reimbursable meal the following day(s). This also applies to the School Breakfast and Afterschool Snack Programs.

Information regarding the Michigan Food Law and Michigan Food Code can be found on the [MDARD website](#)^v.

MDARD's [2012 sharing table memo](#)^{vi} is located on their website.

Questions regarding this Administrative Policy may be directed to the School Nutrition Programs unit by e-mail to MDE-SchoolNutrition@michigan.gov.

ⁱ http://www.michigan.gov/documents/mde/share_table_memo_2012_403046_7.pdf

ⁱⁱ http://www.michigan.gov/documents/mda/MDA_FCTimeHlthCntrl_May08_245944_7.pdf?20150219124228

ⁱⁱⁱ <http://www.fns.usda.gov/meal-service-requirements>

^{iv} <http://www.fns.usda.gov/clarification-policy-food-consumption-outside-foodservice-area-and-whole-grain-rich-requirement>

^v http://www.michigan.gov/mdard/0,4610,7-125-50772_45851_61711---,00.html

^{vi} http://www.michigan.gov/documents/mde/share_table_memo_2012_403046_7.pdf