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To: All Local Health Departments & Other Indiana Food Regulatory Agencies

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Food Protection Program

Subject: Guidance on Schools and Other Facilities Implementing “Sharing Tables” and “Food Recovery” Programs Recommended by USDA

Purpose

This document is provided for awareness and guidance to local health departments (LHDs) and other Indiana food regulatory agencies regarding food safety aspects of “Sharing Tables” and “Food Recovery” in schools and other participants of US Department of Agriculture (USDA)

Child Nutrition Program (CNP),
National School Lunch Program (NSLP),
School Breakfast Program (SBP),
Child and Adult Care Food Programs (CACFP), and
the Summer Food Service Program (SFSP).

These two food handling concepts have developed through USDA as a means to reduce food waste and to encourage consumption of food being offered.

This guidance covers standards for operations based on Indiana Retail Food Establishment (RFE) Sanitation Requirements, 410 IAC 7-24. Attached are educational handouts created through the Department of Education (DOE) and provided to sponsors in Indiana.

Background

Sharing Tables:

USDA defines Sharing Tables as carts and/or tables where a child can place unconsumed food and beverage items that they choose not to eat/drink. Sharing Tables provide an opportunity for other children to take additional helpings of food or beverages at no cost to them for their consumption at school during a meal period.

Food Recovery:

Surplus food recovered under the above mentioned nutrition programs may be donated to eligible organizations, which are defined as any IRS Code 501 (c)(3) tax exempt food banks or charitable organizations. Protections are extended against civil and criminal liability for persons or organizations when making donations to the extent provided under the “Bill Emerson Good Samaritan Food Donation Act,” found in Section 22 of the Child Nutrition Act and Indiana Code 34-4-12.5, “Immunity from Civil Liability for Gifts of Food to Charitable Entities”. Facilities which may receive these food donations include food banks, food pantries, homeless shelters, and similar not-for-profit organizations.

Discussion

Sharing Tables

The safe handling of food in a retail food establishment (RFE) that has been served to one consumer, not consumed, and then re-served to another consumer is provided in section 201 of 410 IAC 7-24. This guidance document, as provided in IC 16-42-5-5, acts to vary this rule section on a statewide basis for facilities operating under the above named USDA programs to enable the re-service of certain potentially hazardous food (PHF) under specified conditions. This will apply only to PHF placed on the table or in the cooler dedicated to the Sharing Table process. Sharing Table PHF cannot be used for later discussed Food Recovery purposes. Any other requirements of 410 IAC 7-24 remain unchanged for these facilities.

Although most Sharing Table operations will only involve the use of a table and/or a refrigerator, LHDs and other Indiana food regulatory agencies may need to be contacted in advance of implementation of these procedures if structural building changes or significant equipment purchase/movement will be involved.

Equipment used in a Sharing Table process may include a table, cart, insulated container, or refrigerator placed at the end of a serving line or nearby. Prepackaged, PHF such as unopened milk, cheese, or yogurt, will be placed on the Sharing Table either directly after purchase or after the buyer is finished with their meal. These items must be consumed or discarded by the end of the meal period and within four hours of service.

Prepackaged, non-PHF will also be placed on the Sharing Table. It may be consumed during the meal period, consumed during later meal periods, or used for Food Recovery purposes when it has been examined by a trained food employee and determined to be in good condition and the package is still intact. A trained food employee could be a food service worker, teacher, adult volunteer, or other adult who has been instructed how to monitor Sharing Table items for product condition, package condition, or contamination.

Sharing Table Requirements

A school or other participants of USDA nutrition programs operating a Sharing Table must do the following:

- Limit the types of food exchanged at the Sharing Table. Examples of food that may be safely shared include:
 - unopened, pre-packaged PHF, such as milk, wrapped cheese, yogurt;
 - unopened pre-packaged non-PHF, such as crackers, fruit bars, cookies, nuts; and
 - wrapped whole fruits and vegetables/unwrapped whole fruits with an inedible peel, such as bananas or oranges.
- Monitor Sharing Table items by at least 1 food employee trained as mentioned above.
- Assure that PHF items placed on a Sharing Table have been consumed by the end of a meal period (breakfast meal period, lunch meal period) or discarded within four (4) hours beyond serving.

Food Recovery

Although most Food Recovery operations should involve only the use of currently installed equipment, LHDs and other Indiana food regulatory agencies may be contacted in advance of implementation of Food Recovery if structural building changes or significant equipment purchase/movement will be involved. A school or other participants of USDA nutrition programs are recommended to make advance contact with food donation receiving organization(s) to assure development of a process for safely handling food.

Food Recovery can involve donating food surpluses of:

- packaged/unpackaged, unserved PHF;
- served/unserved non-PHF with packaging in good condition;
- whole, uncut produce;
- wrapped raw produce; and/or
- fruit which will be peeled (bananas, oranges).

Opened packages of PHF that have been served to a consumer may not be used for Food Recovery purposes.

Unopened packages of PHF placed in a cooler at the end of the serving line, and not taken by another student may be recovered at the end of the lunch period and donated to charitable organizations Food Recovery purposes.

Other PHF/nonPHF recovered for donation must be temperature controlled and handled as otherwise required under 410 IAC 7-24 throughout storage, transport, and while awaiting transport.

Conclusion

USDA seeks to reduce food waste and to encourage consumption of food being offered in schools and by other participants of USDA nutrition programs by promoting the use of Sharing Tables and through Food Recovery.

This guidance varies for these participants on a statewide basis the requirement in 410 IAC 7-24-201, relating to re-service of certain PHF as long as facilities providing Sharing Tables use the criteria stated above. Food Recovery may not involve PHF which has been served to a consumer.

The Indiana Department of Education and/or USDA may have additional requirements not related to food safety.

Food safety questions related to this issue may be directed to the ISDH Food Protection Program at 317-234-8569.

SHARING TABLES

- The Indiana State Department of Health and Indiana Department of Education have collaborated on guidance for implementing sharing tables at school.
- In an effort to reduce the amount of food waste and encourage the consumption of food served, many school food service operations have established sharing tables. Children can place unconsumed food and beverage items that they choose not to eat or drink on the table, providing other children the opportunity to take additional helpings of food or beverages at no extra cost.

Basics

- Before implementing a sharing table, make sure to discuss these plans with your local health department.
- Figure out the location of the sharing table - ideally the table should be close to the cashier or wherever students exit the food service line.
- The sharing table must be monitored by any employee other than the cashier.
- Students can share unopened milk, cheese sticks, and other food or beverages that must be under temperature control if time is used as a public health control and the food is shared within 4 hours.
- Food or beverages sold cannot be collected for resale. Recovered food and beverages should be clearly labeled in a container or box marked food recovery or recovered food for donation and not mixed with unsold foods.

Food Safety

- Students are allowed to drop off their unwanted food on the sharing table or in the designated fridge/coolers at any point during the lunch service. However only temperature controlled food dropped off immediately after leaving the serving line can be donated to food recovery groups.
- The monitor should identify any food, beverage, or condiment to make sure it has not been contaminated (e.g. opened, partially consumed, etc.) and the original packaging is in sound condition.
- If not donating leftovers, discard sharing table items at the end of the last meal service, or within 4 hours of service.
- Students may not be allowed to donate items brought from home.
- Develop a Standard Operating Plan (SOP) in the school's Food Safety HACCP Plan.

Allowable Products

- Non-temperature controlled pre-packaged products like food bars, drinks, crackers and cereal packs.
- Wrapped fruit and vegetables or fruit with a thick skin, like bananas and oranges.
- Temperature controlled pre-packaged products like cheese and milk as long as they are placed in a cooler, refrigerator or ice bath or are consumed within the same lunch period (no more than 4 hours).

Best Practices

- If the school is not already implementing Offer vs. Serve, this will be the best way to combat excess waste on trays.
- Contact the State or your Field Consultant to learn more about the requirements of Offer vs. Serve.
- Other ways to minimize food waste include:
 - Program marketing
 - Increasing food choices
 - Changing food presentation
 - Allowing appropriate time for meals
 - Implementing recess before lunch

FOOD RECOVERY

- The Indiana State Department of Health and Indiana Department of Education have collaborated on guidance for implementing food recovery at school.
- As long as schools are planning and preparing meals with the intent to serve one reimbursable meal per child per day, schools that occasionally have unexpected meal or food surpluses may donate the leftover foods to food banks, food pantries, homeless shelters, and similar non-profit charitable organizations.

Basics

- Before starting any food recovery program, make sure to discuss these plans with your local health department.
- Connect with local non-profit charitable organizations and discuss the best methods for food recovery.
- Develop a system for freezing, labeling the food in a container or box as "recovered food for donation" and storing the prepared food separate from food that will be served to students.
- Figure out how the food will arrive at the organization. Will volunteers pick up the food once a week? Set up the right time and day that works best for the cafeteria managers and kitchen staff.

Food Safety

- Only food that has not been served or in an unopened original package and is maintained in sound condition can be donated.
- Allowable products include pre-packaged products (food bars, drinks, crackers, etc.), wrapped fruit and vegetables or fruit with a thick skin (bananas and oranges), and temperature controlled pre-packaged products like cheese and milk as long as they are placed in a cooler, refrigerator, or ice bath.
- Food that is contaminated by food employees, consumers, or other persons through contact with soiled hands, bodily discharges, or other means shall be discarded.
- All potentially donated food must be stored separately in a container or box labeled, "recovered for food donation" and dated.
- Develop a Standard Operating Plan (SOP) in the school's Food Safety HACCP Plan.

Liability

- Protected for liability under the Bill Emerson Good Samaritan Food Donation Act, found in section 22 of the Child Nutrition Act and Indiana Code 34-4-12.5 "Immunity from Civil Liability for Gifts of Food to Charitable Entities."
- Consolidated and Further Continuing Appropriations Act, 2012 (P.L. 112-55) provides clear statutory authority for current Food and Nutrition Service food recovery and donation policy in use by schools and institutions participating in the Child Nutrition Programs, NSLP, SBP, CACFP, and SFSP.

Best Practices

- Proper menu planning, utilizing production records, and implementing offer versus serve are the best tools to prevent excess leftovers. Contact the State or your Field Consultant to learn more.
- When possible, use leftovers in subsequent meal services, offer sharing tables or transfer food to other sites.
- Use a tracking log to monitor how much food is recovered from each school. This is another way to monitor student acceptability and make changes to future production.

Resources

- www.usda.gov/documents/usda_gleaning_toolkit.pdf
- <http://infohouse.p2ric.org/ref/40/39580.pdf>
- www.foodrescue.net
- http://www.usda.gov/oce/foodwaste/resources/K12_schools.html

