



To: Health Commissioners, Directors of Environmental Health, Food Program  
Specialists, and Interested Parties

From: Ohio Department of Agriculture, Division of Food Safety  
Ohio Department of Health, Food Safety Program

Date: September 13, 2024

Re: Letter of Opinion 2024-01

## School Share Tables

To reduce food waste, many schools in Ohio are operating share tables in their food service operation (FSO), in which foods that are served to students but not consumed are placed on a table for other students to take at no charge. In 2017, the Ohio Department of Health and Ohio Department of Agriculture issued the following School Share Table Guidance.

1. Except for fruits that require peeling such as bananas or oranges, all foods placed on the share table is to be in an intact package.
2. Time/Temperature Controlled for Safety (TCS) foods placed on the share table are to be held at 41°F or below by using mechanical refrigeration, ice bath, or other method. If it is not possible to hold TCS foods at 41°F or below: the foods are to remain on the table for no more than three hours; the time the foods are held on the table above 41°F is to be monitored by school staff; and the foods are to be discarded after three hours and may not be re-served or donated.
3. The share table must be monitored by food employees and any foods that have been opened, punctured, contaminated or adulterated in any way should be discarded.
4. It is also recommended that any school wishing to operate a share table consult with their local health department to ensure the FSO complies with the Ohio Uniform Food Safety Code.

Ohio Administrative Code (OAC) 3717-1-03.2(X) states the following:

*After being served or sold and in the possession of a consumer, food that is unused or returned by the consumer may not be offered as food for human consumption; except a container of food that is not time/temperature controlled for safety may be re-served from one consumer to another if:*

*(1) The population served is not as specified in paragraphs (F)(1) and (F)(2) of rule 3717-1-03.7 of the Administrative Code; and*

*(2) The food is dispensed so that it is protected from contamination and the container is closed between uses, such as a narrow-neck bottle containing catsup, steak sauce, or wine; or*

*(3) The food, such as crackers, salt, or pepper, is in an unopened original package and is maintained in sound condition.*

This letter of opinion provides the following interpretation of OAC 3717-1-03.2(X):

Commercially pre-packaged Time/Temperature Controlled for Safety (TCS) foods left on a share table operated in a school may be re-served by the FSO if the following conditions are met:

- The share table has been monitored by food employees that are properly trained in food safety.
- TCS foods have been held at 41°F or below using mechanical refrigeration, ice bath, or other method.
  - The equipment used to hold TCS foods contained a temperature measuring device as specified in OAC 3717-1-04.1(Y).
- TCS foods that are not held at 41°F or below may not be re-served.
- Foods returned from the share table to the food service operation for re-serving will be stored separately from other foods being held in the food service operation and will be displayed for first use during the next service time.
- Prior to re-serving, all food packages are to be inspected by food employees to ensure they are in good condition so that the food is not exposed to adulteration or potential contaminants as specified in OAC 3717-1-03.1(L).
- Any packages that have been opened, torn, punctured, or otherwise damaged may not be re-served.

Unless rules are adopted that override the interpretation expressed in this letter, the interpretation shall be binding and applied uniformly throughout the state.

This “Letter of Opinion” was reviewed and recommended by the Retail Food Safety Advisory Council at their August 20, 2024 meeting.