



A Toolkit for Implementing Share Tables in Municipal Schools

Acknowledgements

This document was prepared by the Environmental Law Institute (ELI). ELI Staff contributing to this study include Linda Breggin, Sarah Backer, Margaret Badding, and Jessica Sugarman. We are grateful for the valuable input from our partner Urban Green Lab and its Director Todd Lawrence and the Metropolitan Government of Nashville and Davidson County's Chief Sustainability and Resilience Officer, Kendra Abkowitz, as well as the inter-governmental team she led. The content, including any errors or omissions, is solely the responsibility of ELI.

About the Environmental Law Institute

The Environmental Law Institute makes law work for people, places, and the planet. Since 1969, ELI has played a pivotal role in shaping the fields of environmental law, policy, and management, domestically and abroad. Now, in our sixth decade, we are an internationally recognized, non-partisan publishing, research, and education center working to strengthen environmental protection by improving law and governance worldwide.



ENVIRONMENTAL
LAW • INSTITUTE®

A Toolkit for Implementing Share Tables in Municipal Schools © 2023
Environmental Law Institute®, Washington, D.C. All rights reserved.

Cover design by Evan Odoms.
Cover photo: KariDesign/shutterstock.com.

A Toolkit for Implementing Share Tables in Municipal Schools

Table of Contents

Model Implementation Guide4

 I. Overview4

 II. Step-By-Step Activities5

 III. Potential Concerns and Solutions9

 IV. Resources Chart10

Model Standard Operating Procedures.....11

Model Food Tracking Sheet13

Model Implementation Guide

I. Overview

Share tables, also known as “sharing tables,” are designated areas within schools where students can place or return whole or unopened food and drinks they do not want. Students who want additional food can enjoy the items during the meal service at no cost. Accordingly, share table programs can help reduce food waste while enabling students from food-insecure households to access healthy foods more easily.¹ Many schools across the country have instituted share tables.

Section II of this Guide outlines best practices for share tables by implementation phase: (1) Planning, (2) Set Up, (3) Procedure/Rules During Meal Period, and (4) Procedure/Rules Following Meal Period. The best practices outlined are based on a review of federal and a sampling of state share table guidelines as well as local government, nonprofit, and university resources. To make it easy to start a new share table program, the Guide provides templates as well as links to existing resources. The State of Tennessee and the Metropolitan Government of Nashville and Davidson County are used as examples throughout the Guide.

Section III discusses potential concerns associated with school share tables and how to address them.

Section IV consists of a master chart of individual resources that were used to identify the best practices captured in the step-by-step implementation guide in Section II. The resources are substantively consistent, for the most part, although in some cases practices reflect regional regulatory frameworks. Individual resources should be consulted for further information.

¹ Schools can adopt additional food waste reduction measures in conjunction with share tables such as Offer Versus Serve (OVS) which allows students during a meal period to decline a certain number of food items and select those they prefer. Other successful measures include offering multiple food choices, ensuring careful portion control, implementing recess before lunch, increasing the length of meal period, and scheduling meal periods so they are not too close together. See, e.g., US EPA & Oregon Green Schools (2021). *Oregon School Food Share Program Guide (Appendix A & B)*, <https://dochub.clackamas.us/documents/drupal/fcba3f09-5b0f-448b-a48b-402e205c346f>. Furthermore, some schools may want to donate surplus food from their share tables and that is encouraged, but it is beyond the scope of this Guide. Several resources included in the Resources Chart (Section IV), however, include information about donation of surplus food from share tables.

II. Step-By-Step Activities



Planning Share Table Program

A. Create a Share Table Team

- 1) Recruit members such as cafeteria managers/staff, teachers, school administration, students (can include environmental student groups, for example), and parents.
- 2) Meet twice a month during the first year of operation to plan for implementation and adjust, as needed, the way in which share tables are operated to ensure effective functioning.
- 3) Complete foundational tasks:
 - i) Identify key staff and volunteers responsible for implementation.
 - ii) Determine other key stakeholders and how they can support the program.
 - iii) Brainstorm potential opportunities and challenges.
 - iv) Identify ways to promote share table with students/others.
 - v) Develop a work plan with an implementation timeline and metrics to track progress and success.

B. Review and Ensure Compliance with State and Local Guidance and Regulations

- 1) Review United States Department of Agriculture's [guidance](#).
- 2) Review the relevant state department of education guidance documents (e.g., Tennessee Department of Education's [guidance](#)).
- 3) Consult with municipal health department for review and approval of share table program (e.g., Metropolitan Government of Nashville and Davidson County [Food Division](#)).

C. Adopt Practices Consistent with School District's Standard Operating Procedures

- 1) Review the local school district's standard operating procedures (SOP).²
- 2) Adopt SOP practices for managing the share table, staff responsibilities, and record keeping procedures among other topics.

² See the Model SOP section on page 11 for an example based on Metro Nashville Public Schools.

D. Communicate Program Details

- 1) Coordinate with custodial and cafeteria staff to ensure that they are aware of program details and discuss the support they can provide.
- 2) Send emails and letters home to parents to introduce share table program.
 - Samples: [FoodRescue.net](#), [Broward County Public Schools](#), and Environmental Protection Agency's [Oregon School Food Share Program Guide](#) (Appendix, page C-8).
- 3) Educate students on share table purpose and procedures at the semester start.
 - i) Employ thoughtful messaging regarding share tables:
 - (a) Convey that students are expected to eat the food they choose.
 - (b) Encourage placing unwanted items on table but do not require students to donate.
 - (c) Encourage students to take another serving of foods they enjoy if they are still hungry.
 - ii) Utilize existing means of communication such as student assemblies, morning announcements, school newsletter, bulletin boards, and videos.
 - iii) Invite students to be “share table helpers,” and teach them the importance of food safety and reducing waste.
 - iv) Coordinate with any school “green team” to assist with implementation.

E. Resources for Student Education

- a) *Food Waste Reduction Education:*
 - i) World Wildlife Fund's [K-12 lessons and activities](#) and StopWaste's [K-12 Educational Resources](#) provide a curriculum model for food waste reduction.
 - ii) Environmental Protection Agency and U.S. Department of Agriculture's [Student Food Waste Audits](#) guide can help educate students about the extent of food waste at their schools and encourage waste reduction.
- b) *Food Safety Education:*
 - i) StopWaste's share tables video series can be used to inform students of the purpose and rules of use for share tables.
 - (1) Elementary Schools: [Food Share Table Guide for Elementary Schools](#).
 - (2) Middle and High Schools: [Understanding School Food Share Tables](#).
- c) *Template for School Posters:*

- i) World Wildlife Fund's [Food Waste Warrior Posters](#) contain educational messaging on food waste and share tables.

Share Table Set Up

A. Ensure Proper Share Table Placement

- 1) Situate the table in an easily accessible, highly visible location.
- 2) Locate the table after the point of service and away from possible sources of contamination.
- 3) Place a temperature-controlled storage bin, such as an ice bath, cooler or, ideally, a refrigerator on the share table or nearby for perishable items such as milk and cheese.

B. Use Appropriate Containers

- 1) Use transparent containers (e.g., wire baskets, clear plastic tubs) if possible, as they allow students to see what is available.

C. Use Signage Effectively

- 1) Post clear signage to designate share table area.
- 2) Remind students of rules for use.
- 3) Use eye-catching signage, displayed at eye level.
 - Samples: StopWaste's [free share table sign](#) illustrates acceptable items; for a more detailed share table poster, see EPA's [Oregon School Food Share Program Guide](#) (Appendix, page C-13).

Share Table Procedure/Rules During Meal

A. Create a Detailed List of Allowable and Non-Allowable Food/Beverage Items

- 1) Consult state guidance (e.g., State of Tennessee's [guidance](#)).
- 2) Ensure all foods permitted are in an intact package except peel-able fruits such as oranges and bananas.
- 3) Ban items brought from home on the share table.

B. Refrigerate Perishable Food/Beverage Products

- 1) Put milk, cheese, and other perishable food in a temperature-controlled storage bin, such as an ice bath, cooler, or, ideally, a refrigerator near the share table.

- 2) Maintain temperature at, or below, 41°F.

C. Designate a Monitor

- 1) Recruit food service staff and others to supervise share table.³
- 2) Train monitors to ensure that unapproved items are not included, and that contamination has not occurred/original packaging is intact.

D. Encourage Students to Place Items on Share Table *Prior* to Sitting Down to Eat

- 1) Explain that this approach reduces potential contamination of food/beverage items.

E. Permit Only Students to Take Items Placed on Share Tables During Meal Period (e.g., staff are not allowed to take items)

Share Table Procedure/Rules Following Meal Period

A. Examine, Sort, and Store Remaining Items

- 1) Examine unclaimed food/beverages on the share table at the end of each meal service period for possible re-use.
- 2) Sort and put away, or discard items, based on safe temperature and handling rules.
- 3) Consult applicable state guidance (e.g., State of Tennessee guidance requires discarding “time/temperature control for safety foods,” if more than four hours from time of original service).

B. Create and Maintain a Food Recovery Log⁴

- 1) Record remaining food/beverage items at the end of each meal service.
- 2) Assess how much food may be available for re-service based on log data.
- 3) Identify commonly wasted foods based on log data and adjust menu planning and purchasing as appropriate.

³ For more information on this and other safety recommendations, see USDA (2016). *Share Tables Food Safety Requirements and Other Best Practices*, https://fns-prod.azureedge.us/sites/default/files/cn/SP41_CACFP13_SFSP15_2016os.pdf#page=4

⁴ See the Model Food Tracking sheet on page 13 for a template.

III. Potential Concerns and Solutions

In implementing share tables, schools should monitor and address any concerns that are raised by students, staff, and/or parents. The following are some common concerns and possible options for addressing them:

A. Student Allergies

- i) Ensure share table procedures are consistent with school's existing food allergy policies.
- ii) Address potential concerns about increased risk of allergen exposure in outreach that introduces students and parents to the program.⁵
- iii) Post signage that clearly identifies foods with known allergens.
- iv) Recommend that students with food allergies do not take food from the share table.

B. Nutritional and Over-Eating Concerns

- i) Employ gentle verbal reminders from adult monitors and/or signage to encourage students to eat a balanced meal and avoid excessive portions of one food item from share table.

C. Stigma Associated with Share Tables

- i) In messaging to students, teachers, and parents, emphasize that all students (especially "picky eaters") can donate and take food from the share table.
- ii) Cite the many benefits of share tables beyond reducing hunger in schools.⁶

⁵ Prescott, M. P., & Rolfsen, K. (2017). *Share Table 101*. Colorado State University & Colorado Department of Education, <https://slideplayer.com/slide/13890814>.

⁶ Harvard Law School Food Law & Policy Clinic (2016), *Keeping Food out of the Landfill: Policy Ideas for States and Localities*, https://chlpj.org/wp-content/uploads/2013/12/Food-Waste-Toolkit_Oct-2016_smaller.pdf

IV. Resources Chart

SAMPLE BEST PRACTICES/GUIDANCE ON SCHOOL SHARE TABLES	
State, Municipality, or Organization	Source Title
STATE / MUNICIPALITY	
State of California	Management Bulletin CNP-03-2018: The Use of Share Tables (2018)
Los Angeles County, California	Share Tables & Food Donations in Schools: Best Practices for LA County (2018); CalFresh Healthy Living Share Table Implementation Guide (2019)
San Diego County, California	Share Tables at Schools (n.d.)
San Mateo County, California	School Share Table Guide (2021)
District of Columbia	Share Tables: Guidance for DC Schools (2018)
State of Florida	Share Tables (2019); Florida School Food Access Toolkit: A Guide for K-12 Schools (n.d.)
State of Indiana	Guidance on Schools and Other Facilities Implementing "Sharing Tables" and "Food Recovery" Programs Recommended by USDA (2015)
State of Iowa	Sharing Tables at School Fact Sheet (2018)
State of Maine	Food Sharing Tables – Guidance for Schools (2019)
State of Minnesota	Share Table Guidance for Schools (n.d.)
Dakota County, Minnesota	Preventing Wasted Food in Schools (2019)
State of New Jersey	Share Tables Fact Sheet (2019)
State of New York	Sharing Tables: Food Safety at Sharing Tables (n.d.)
State of Ohio	Building a Share Table in Central Ohio K-12 Schools (n.d.); A Guide to Reduce Food Waste at Schools in Ohio, Kentucky, and Indiana (2017); Guidance for School Share Table (2017)
State of Rhode Island	Share Table and Food Donation Guidance for Schools (2019)
State of South Carolina	Reducing Food Waste: A Guide for South Carolina Schools (2017)
State of Vermont	Food Sharing Tables – Guidance for Schools (2016)
City of Seattle & King County, Washington	Considerations for Internal School Donations (Share Tables) (n.d.)
King County, Washington	Lake Washington School District Food Share and Donation Pilot Program January – June 2019 Summary Report (2019)
State of Wisconsin	Sharing and No Thank You Table Toolkit for Schools Participating in the School Nutrition Programs (2021)
ORGANIZATION	
NRDC	Wasting Less Food In K-12 Settings: Best Practices for Success (2018)
Rutgers University	School Food Waste Reduction Toolkit: A Guide to Reducing Food Waste In New Jersey's K-12 Schools (2019)
University of Arkansas	Enabling Share Tables in the National School Lunch Program: Legal Review and Best Management Practices (2017)
StopWaste	Helping Schools Save Food: Food Share Table (n.d.)
Oregon Green Schools & EPA	Oregon School Food Share Program Guide (2021)
ReFED	Federal Liability Protection for Food Donation (2023)

Model Standard Operating Procedures⁷

SHARE TABLES DEFINED:

Share tables are carts or tables where children can place selected but unconsumed food and beverage items that are pre-packaged, unopened, wrapped, or with a non-edible peel. Examples include cereal packs, packs of crackers, bags of chips, and time/temperature control for safety (TCS) foods, including milk cartons, cheese sticks, and yogurt cups. A share table can reduce the amount of food waste in school cafeterias, especially for programs with no option for students to choose their meal components.

INSTRUCTIONS:

Step 1: Ensure only permissible food items are placed on share table per [State of Tennessee guidance](#).

What Can and Cannot Be Shared

Items that can be shared and re-served	Items that can be shared and must be discarded at the end of service	Items that cannot be shared
Pre-packaged food from the storeroom, such as: <ul style="list-style-type: none"> • packs of crackers, • bowls of cereal, • individually wrapped granola bars, • bags of chips, and • individually packaged cups of canned fruit. 	TCS foods, such as: <ul style="list-style-type: none"> • string cheese, • pre-packaged sliced apples or baby carrots, • yogurt cups, and • deli meat. 	Opened foods, such as: <ul style="list-style-type: none"> • opened bags of baby carrots, • opened milk cartons, and • opened bananas.
Whole pieces of fruit with an inedible peel or wrapped edible peel, such as: <ul style="list-style-type: none"> • bananas, • oranges, and • plastic-wrapped apples. 	TCS beverages, such as: <ul style="list-style-type: none"> • cartons of milk, and • juices that require refrigeration. 	Packaged items that are not sealed or can be opened and re-sealed, such as: <ul style="list-style-type: none"> • baby carrots in a zip top bag, • canned peaches in a soufflé cup with lid, • chef salads in a clam shell, and • side salads in a foam bowl.
Shelf-stable beverages, such as: <ul style="list-style-type: none"> • aseptic juice boxes that do not require refrigeration, • aseptic milk boxes that do not require refrigeration, and • bottled water. 		TCS foods when: <ul style="list-style-type: none"> • TCS foods are not pre-packaged, such as pizza slices or hot vegetables, and • temperature is not controlled or a "time as a public health control" procedure is not in place.

⁷ Note that this model SOP uses the Metro Nashville Public School District as an example. School districts should modify language in accordance with local and state regulations.

Step 2: Follow health and food safety guidelines to prevent the risk of foodborne illness for food/beverage items that require cooling (TCS foods).

- a) Request approval to implement share tables from [Metro Health Department's Food Division](#) by emailing a suggestion to the Metro Food Inspection Division or calling 615-340-5620.
- b) TCS foods may be placed on a share table, but they cannot be re-served to students following the meal period.
- c) Place TCS foods in a temperature-controlled storage bin, such as an ice bath, cooler, or, ideally, a refrigerator so they can be kept under temperature control (41°F or colder) and discarded at the end of the meal service.
- d) Discard TCS foods within a timeframe not to exceed four hours from the time of the original service.
- e) Fill out the Share Table Tracking Sheet (see below) on a continuing basis.
- f) Unopened, packaged, non-TCS foods may be clearly labeled, collected, and returned to the kitchen.
- g) Do not store unopened, packaged, non-TCS foods intermixed with items that have not yet been prepared and served.
- h) Make note of expiration dates on packaged foods and discard as needed.
- i) Re-serve non-TCS foods only once to students (per USDA recommendation).

Step 3: Supervise the share table at all times to ensure compliance with food safety requirements.

- a) Make sure packaging of items placed on the share table is not open, punctured, or otherwise compromised.
- b) Monitor any cooling bins for TCS foods to ensure that time and temperature control requirements are met.
- c) Do not allow items brought from home to be placed on the share table.
- d) Caution students with allergies not to take food from the share table.
- e) Allow children to participate as “share table helpers,” or assistant monitors, and teach them about the importance of food safety and recycling.

Model Food Tracking Sheet⁸

Date: _____

School Name: _____

Lunch Period: _____

Name of Table Supervisor: _____

Purpose: This form should be used to track the items returned to the share table and stored by your school for reservice at another meal.

Food safety reminders:

- ❖ Per USDA guidance, maintain “time/temperature control for safety (TCS) foods,” such as milk and string cheese, at a proper temperature (41°F or below) by using temperature-controlled storage bins, such as ice baths, coolers, or refrigerators.
- ❖ Do not leave milk out for more than four cumulative hours.
- ❖ Per State of Tennessee guidance, do not ever re-serve TCS foods to students after they have been on the share table.
- ❖ Make sure to note the expiration dates on packaged foods.
- ❖ When storing share table items, do not intermix them with cafeteria items that have not yet been prepared and served.

Instructions: It is important to accurately record dates and times—and sign your initials by each entry.

- ❖ Date & Time Received: When foods are received on the share table.
- ❖ Date & Time Packed & Stored: When foods are returned to the kitchen for use in a future food service.
- ❖ Date & Time Re-used or Picked-up: When foods are re-served for another meal or snack.

⁸ Schools should adjust this language in accordance with relevant local and state guidance.



ENVIRONMENTAL
LAW • INSTITUTE®

1730 M Street, NW, Suite 700

Washington, DC 20036

Tel: 202.939.3800

Fax: 202.939.3868

www.eli.org