

Orange County Health Department

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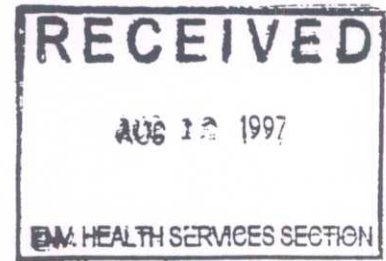
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August 6, 1997

Mr. Ed Norman, Program Supervisor
Children's Environmental Health Branch
Environmental Health Services Section
Division of Environmental Health
P.O. Box 29534
Raleigh, NC 27626-0534



Dear Ed,

Perry Burns, an Environmental Health Specialist with Orange County, and I met yesterday with several day care facility operators from Orange County and representatives of the Child and Adult Care Food Program to discuss a few matters that come up during our inspections. The major discussion was that of "family style dining" in day care meal service. Although I have read the correspondence between you, Ray Hawkins and Linnea Larson from May and I fully understand and appreciate the intent of proper physical, social and motor skills development for children with this process, I still have concerns and questions about the application of the .2800 rules to this practice and whether it is appropriate or even legal within the current context of those rules.

As you know, section .2805 states clearly that "Food shall be protected at all times from potential contamination, including . . . unnecessary handling, coughs and sneezes . . .". It is hard to conceive that allowing direct access to each food item in a prepared meal to every child at a given table could ever be construed as "necessary" from a public health standpoint. It is even harder to understand (at least for me) that food served in this manner can have any protection from coughs and sneezes.

It is my belief, if family style service is to be used in day cares, that the .2800 rules should be amended to provide specific regulatory guidelines for the practice, as is the case with the restaurant rules. In the absence of such guidance and with our directive of ensuring that minimum public health standards are met in these facilities, I believe this type of service can only be viewed as a violation of our existing rules. If I'm incorrect in my assessment of this situation, please help me to understand the error of my ways.

Ed Norman, August 6, 1997
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I have already spoken with Jimmy Clayton about this matter and he encouraged me to contact you. I will gladly answer any questions you have about this letter and look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ron Holdway', with a large, sweeping flourish extending to the right.

Ron Holdway,
Environmental Health Director

cc: Jimmy Clayton, REHS

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Environmental Health
Environmental Health Services Section

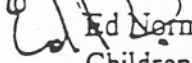


James B. Hunt, Jr., Governor
Wayne McDevitt, Secretary
Linda C. Sewall, Director

August 27, 1997

MEMORANDUM

TO: Mr. Ron Holdway, Environmental Health Director
Orange County Health Department

FROM:  Ed Norman, Program Supervisor
Children's Environmental Health Branch

SUBJECT: Family Style Dining in Child Day Care Facilities

In response to your letter of August 7, 1997, the issue of family style dining has been considered on several occasions by my staff and Mr. John Barkley with the Attorney General's Office. Enclosed is a letter written in July 1996 in response to the question of family style food service in child day care facilities.

The issue of family style dining is not specifically addressed in the child day care rules (15A NCAC 18A .2800) as it is in the food sanitation rules (15A NCAC 18A .2600) and must be considered an allowable practice in a child day care facility until such time as it is specifically prohibited.

As expressed by the advocates of this practice, developmental, physical, social and motor skills are potentially enhanced for children who participate in eating family style meals. However, this practice must be closely supervised by the day care operators to prevent contamination from coughs, sneezes and unnecessary handling.

To better protect young children, revision of the .2800 rules may be needed. If you have suggestions for the wording of such a rule, or any other questions, please share them with me at (919) 715-3293.