



REC-IMO-008	Recreational and Educational Camps
Revision: 1.0	Recreational and Educational Camps and Hospitality Activities
Approved: 12/15/2023	Wis. Admin. Code: ATCP 78

TO: All DATCP Retail Food Staff and Agents

FROM: Bureau Director, Bureau of Food and Recreational Businesses

SUBJECT: Interpretation Regarding Recreational and Educational Camps and Hospitality Activities

1.0 Purpose

The purpose of this document is to provide an interpretation of when hospitality activities are applicable and scenarios applicable to a recreational and educational (rec ed) camp license alone. The purpose is to afford camps the opportunity to provide additional retail food, camping or lodging opportunities using the same rec ed structures as when campers are in session, without having to obtain additional licensing for that activity, including family camps, adult retreats, wedding parties or various online rental platforms.

2.0 Scope

This interpretive memo applies to Department and agent environmental health staff conducting rec ed camp licensing and inspection.

3.0 Definitions

3.1 “Student food service” means related to a campus-based rec ed camp license, includes professors and university staff, legal guardians or parents of a student, visitor of a student, current students, and prospective students who may occasionally obtain a meal from a university retail food facility.

3.2 “Camper” means an individual under the care and supervision of the camp or a rental group that has a written agreement with the camp and includes all of the following: (a) a minor child. (b) An adult with developmental disability. (c) Children, youth and adults under legal guardianship or court directed conservatorship.

3.3 “Hospitality activity” means an additional activity offered by a camp operator including a retail food establishment, campground, hotel, motel, bed and breakfast establishment, or tourist rooming house within the confines of the camp, utilizing the same camp structures to serve other adult guests and their families. Simply put, if a rec ed camp’s facilities are utilized by other groups or individuals when the rec ed camp is not in session, then it would qualify for this add-on.

4.0 Interpretation

ATCP 78.07 (1) (a) 7. allows the operator of a rec ed camp that also offers retail food, campground, hotel, motel, bed and breakfast or tourist rooming house within the confines of the camp premises, using the same camp structures to serve other adult guests and families without the need for additional licenses.

The Department was asked how the rec ed camp license model applies to college campus-based programs as well. This depends on the overall patrons served. The rec ed camp license itself applies when a retail kitchen specifically serves campers and campus students given the meaning “student food service,” as described in the note to ATCP 78.07 (1) (a) 7.: *An example when an additional retail food license is not required. A university campus kitchen prepares and serves food to campers and campus students, because the kitchen does not solely operate independently but in conjunction with student food service, no additional retail food establishment license is required.*

When a college campus dining hall is open to the general public or is a central production kitchen that prepares meals for other entities such as a daycare, where anyone can enter the building to purchase food, the rec ed camp “with hospitality” does not apply. A separate retail food establishment license is required.

4.1 Scenarios with retail food service activity:

- A University cafeteria open year-round exclusively for “student food service” i.e., college students, and personnel with their college ID or badge, is exempt from holding a retail food establishment license pursuant to ATCP 75.04 (35). During rec ed camp sessions, campers are also designated to eat at this central cafeteria.
 - This camper food service would be covered under the rec ed camp license.
 - Other retail food establishment operations separate from the University cafeteria or contracted food service operations will need a retail food establishment license.
- A University dining hall is open year-round, not only for “student food service” but also the general public and provides the opportunity for the nearby community or neighborhood to patronize the retail venue. During rec ed camp sessions, campers are designated to eat at this central cafeteria.
 - Because the food service extends beyond just campers and “student food service” to also serve members of the general public, a retail food license is required and would not be considered a hospitality activity under the rec ed camp license.
- A rec ed camp has a family camp week where parents attend camp along with their kids. It’s a time for families to do the camp activities and meal service together. This family camp week occurs during the rec ed camp session.
 - This is covered under the rec ed camp license.
- A rec ed camp provides food for family camping when the rec ed camp is not in session.
 - This is considered rec ed camp ‘with hospitality.’
- A rec ed camp offers a coffee shop serving campers during the season and is also available to camper’s legal guardians on pick-up and drop-off days. The coffee shop is not open outside of the rec ed camp season.
 - This is covered under the rec ed camp license.
- A rec ed camp offers a coffee shop that serves campers during the season and rents out the camp to other groups who use the premises beyond the rec ed camp session, i.e., adult retreats, family reunions, weddings, etc.

- This is considered rec ed camp ‘with hospitality.’

4.2 Scenarios with campground activity

- A rec ed camp only offers campsite space for volunteers, camp staff who support rec ed camp operations, or families visiting their campers during the season.
 - This is covered under the rec ed camp license.
- A rec ed camp offers campsite space that is used for camper activities and volunteers or camp staff during the rec ed camp season and other parties from the general public can also utilize the same campsites.
 - This is considered rec ed camp ‘with hospitality.’
- A rec ed camp has a campground on the premises that is used by the general public but is not part of the rec ed camp camper activities.
 - A campground license is required.

4.3 Scenarios with lodging activity

- A rec ed camp premises offers a conference center used by rental groups including high school youth groups for rec ed camp activities and allows adult crafting, and family retreats, utilizing meeting space and overnight lodging year-round. The kitchen is also used to supplement the primary camper dining hall on premises during the camp season.
 - This is considered rec ed camp ‘with hospitality.’
 - This scenario demonstrates how “with hospitality” enables a camp to offer 1, 2, or all 3 additional activities in a way that fits each camp’s business model.
- A rec ed camp premises offers a conference center used by adult and family rental groups for their own retreats, meeting space and overnight lodging. The kitchen is also used to supplement the primary camper dining hall on premises during the camp season.
 - Because campers do not utilize the lodging, a separate lodging license would be required.
 - Since the kitchen of the conference center is used to support rec ed camp camper activities, the retail operation would be considered rec ed camp “with hospitality.”

5.0 Contacts

DFRS Recreational Technical Specialists: datcpdfsrec@wisconsin.gov

6.0 References

6.1 Wis. Admin. Code ch. ATP 78

7.0 Document History

The most recent changes to this controlled document are listed at the top of the table:

Revision	Author	Change Description	Approval Date
1.0	Rec. program staff	New document	12/15/2023

Approval

Tasks

This workflow created the following tasks. You can also view them in [Approval \(New\) Tasks](#).

<input type="checkbox"/> Assigned To	Title	Due Date	Status	Related Content	Outcome
<input checked="" type="checkbox"/> Sprecker, Troy S	Please approve Rec Ed Camps Hospitality DRAFT	12/19/2023	Completed	Rec Ed Camps Hospitality DRAFT	Approved

Workflow History

The workflow recorded these events.

<input type="checkbox"/> Date Occurred	Event Type	<input type="checkbox"/> User ID	Description	Outcome
12/15/2023 3:05 PM	Workflow Initiated	<input checked="" type="checkbox"/> Northwood, Andrea M	Approval was started. Participants: Sprecker, Troy S	
12/15/2023 3:05 PM	Task Created	<input checked="" type="checkbox"/> Northwood, Andrea M	Task created for Sprecker, Troy S. Due by: None	
12/15/2023 3:15 PM	Task Completed	<input checked="" type="checkbox"/> Sprecker, Troy S	Task assigned to Sprecker, Troy S was approved by Sprecker, Troy S. Comments:	Approved by Sprecker, Troy S
12/15/2023 3:15 PM	Workflow Completed	<input checked="" type="checkbox"/> Northwood, Andrea M	Approval was completed.	Approval on Rec Ed Camps Hospitality DRAFT has successfully completed. All participants have completed their tasks.