

INDUSTRY GUIDELINES

WRITTEN OPERATIONAL PROCEDURE

The procedure must be written and pertain only to ready-to-eat foods that will be served to an individual customer within 4 hours of preparation. For example:

- Salads and sandwiches made more than 4 hours in advance of service **must not** be handled with bare hands.
- Boning or de-veining of cooked foods that will be held for more than 4 hours **must not** be handled with bare hands.

Since menu changes may add or delete bare-hand contact with ready-to-eat foods, the procedure will require continual updating.

Procedures may be centrally located in physically large operations such as theme parks or stadiums.

At no time in the food handling process may bare hands touch raw animal foods and then touch ready-to-eat foods without proper hand washing.

PROFESSIONAL HYGIENE TRAINING

Evidence of professional hygiene training for employees who handle ready-to-eat foods with bare hands must be available for review. "Evidence" is to include content and the date individual employees received training. The intent is to assure that employees demonstrate their knowledge of hygienic practice by washing their hands properly and frequently with soap, warm water and a rubbing action for at least 20 seconds.

HAND SANITIZER

Employees who handle ready-to-eat foods with bare hands must not only wash their hands as required by the Food Code but also utilize a hand sanitizer

after hand washing. Commercially available hand sanitizers are acceptable.

EMPLOYEE MONITORING AND CORRECTION

The written procedure must include a description of how employees will be monitored for compliance and, when necessary, corrected. Compliance with the written procedure and the Food Code applies to everyone handling food, including owners and managers.

PROCEDURES AVAILABLE AND REVIEWED AT LEAST ANNUALLY

A copy of the written procedure must be available at the food establishment at all times. The procedure must be reviewed annually by the establishment and the review recorded.

WHAT ARE READY-TO-EAT FOODS

Ready-to-eat food means food that is in a form that is edible without washing, cooking, or additional preparation. Ready-to-eat foods include: unpackaged and cooked potentially hazardous food, raw, washed, cut fruits and vegetables, whole, raw fruits and vegetables that are presented for consumption, and other food presented from which rinds, peels, husks, or shells are removed.

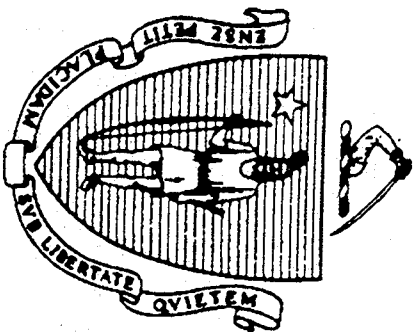
**Alternative to Bare-Hand
Contact with**

Ready-to-Eat Foods

1999 FDA Food Code

3-301.11

**Preventing Contamination
from Hands**



**Massachusetts Department of
Public Health**

**Division of Food and Drugs
305 South Street
Jamaica Plain, MA 02130
617-983-6700**

**1999 Food Code
3-301.11 & 590.004(E) Preventing Contamination
from Hands**

(A) FOOD EMPLOYEES shall wash their hands as specified under 2-301.12.

(B) Except when washing fruits and vegetables as specified under 3-302.15 or when in compliance with the Department's policy on alternative procedures for bare-hand contact with ready-to-eat food, FOOD EMPLOYEES may not contact exposed, READY-TO-EAT FOOD with their bare hands and shall use suitable UTENSILS such as deli tissue, spatulas, tongs, SINGLE-USE gloves or dispensing EQUIPMENT.

Single-use natural rubber latex gloves are not recommended in food establishments.

(C) FOOD EMPLOYEES shall minimize bare hand contact with exposed FOOD that is not in a READY-TO-EAT form.

The above Food Code language relates to "no bare hands contact with ready-to-eat foods". Compliance with the Food Code standard regarding "no bare hands contact with ready-to-eat foods" must be met if a food establishment operator does not provide a satisfactory Written Alternative Operational Procedure.

**105 CMR 590.000 Minimum Sanitation
Standards for Food Establishments -
Chapter 4- 590.004(E) Bare Hand Contact
with Ready-To-Eat Food**

(D) Pursuant to the language "when in compliance with the Department's policy on alternative procedures for bare-hand contact with ready-to-eat food", food employees may contact ready-to-eat foods with their bare hands immediately prior to service if the operator of the food establishment maintains a written operational procedure which addresses all of the following components:

1. Identification of:

- a. specific work area(s), such as the sandwich prep line;
 - b. employee position(s) where bare hand contact with ready-to-eat foods will occur;
 - c. actual food preparation processes where bare-hand contact with ready-to-eat food will be used; and
 - d. employees' procedures for handling ready-to-eat foods, which must also include how cross contamination from touching raw animal food and ready-to-eat food is precluded.
2. Identified food employee positions whose duties may include handling of ready-to-eat foods with their bare hands must receive professional hygiene training prior to any food handling activity. Training shall be provided to all employees assigned to positions which include handling ready-to-eat foods, emphasizing the importance of proper hand washing for all employees with direct hand contact with ready-to-eat food. Evidence of this training (content, employees, dates) shall be available to the board of health upon request.
3. Employees who handle ready-to-eat foods must thoroughly wash their hands before returning to their work stations and as needed during their work periods in accordance with the hand washing requirements of the Food Code. Additionally, these employees shall use a chemical hand sanitizing solution which must comply with the specification provided in FC 2-301.16(C). The establishment must also fully comply with FC 5-203.11(A) and 5-204.11, regarding the number and location of hand washing lavatories.
4. The person in charge is responsible for verifying, prior to any food handling activity, that all food handling employees are in compliance with FC 2-201.11, 2-201.12 and 509.003(E), relative to employees' health status, exclusions, and restrictions.
5. The operational procedures must provide an effective way to monitor employees to verify compliance with the requirements of the Food Code and the specifications of the written procedures. Additionally, the written procedures must also describe the corrective actions the

operator must take when procedures are not followed. All employees, including the operator, or supervisory positions, who handle ready-to-eat foods with bare hands must comply with all requirements of the Food code and the establishment's written operational procedures.

(E) A copy of the operational procedures must be maintained and made available in each food establishment at all times. The operational procedures must be reviewed by the operator annually and modified as necessary. A verification of the annual review must be recorded as part of the written procedures.

(F) If an establishment employee is observed using bare hands to handle ready-to-eat foods and the establishment has failed to develop, maintain, or make available a written set of operational procedures, or, comply with any requirement relative to the use of bare hands, personal health, or professional hygiene, the board of health shall cite the establishment for noncompliance. A subsequent finding of noncompliance during a re-inspection relative to the use of bare hands, personal health, or professional hygiene will result in enforcement action in accordance with 105 CMR 590.000, and enforcement of FC 3-301.11(B) until the establishment operator verifies corrective action such as, remedial training.

(G) If the board of health is notified of a suspected foodborne illness outbreak in any establishment which utilizes bare-hand contact with ready-to-eat foods, the board of health will temporarily enforce no bare-hand contact in accordance with FC 3-3-01.11(B) until a determination is made by the board of health whether a foodborne illness outbreak exists or the origin of the foodborne illness is determined to be a food employee associated outbreak, the board of health shall pursue enforcement action in accordance with 105 CMR 590.000, and continue to enforce compliance with FC 3-301.11(B) until the establishment operator verifies corrective action and completes remedial training.