

BARE HAND CONTACT OF READY-TO-EAT FOODS

What is Bare Hand Contact?

Bare Hand Contact is handling of ready-to-eat foods without any barriers such as gloves or utensils between the employees' hands and the food items. "Ready-to-eat food" means food that is in a form that is edible without additional preparation to achieve food safety. Ready-to-eat foods are not allowed to be handled using bare hand contact unless proper documentation and procedures have prior approval by Metro Health.

Why Does Bare Hand Contact require approval from the Health Department?

"In November 1999, the National Advisory Committee on Microbiological Criteria for Foods (NACMCF) concluded that bare hand contact with ready-to-eat foods can contribute to the transmission of foodborne illness." (FDA Food Code 2017, page 417).

"The three interdependent critical factors in reducing foodborne illness transmitted through the fecal-oral route, identified by the NACMCF, include exclusion/restriction of ill food workers; proper handwashing; and no bare hand contact with ready-to-eat foods. Each of these factors is inadequate when utilized independently and may not be effective. However, when all three factors are combined and utilized properly, the transmission of fecal-oral pathogens can be controlled." (FDA Food Code 2017, page 417).

What are Examples of Ready-to-Eat Foods?

The definition of a ready-to-eat food is: "Food that is edible without additional preparation to achieve FOOD safety" (FDA Food Code 2017, 1-201.10 (B) Definitions) Examples:

- Cooked or prepared foods
- Raw or partially cooked foods such as sushi and oysters
- Fruits and vegetables that have been washed
- Baked goods such as tortillas and bread
- Spices and seasonings

How can Ready-to-Eat foods be handled properly?

Ready-to-eat foods can be handled using a barrier, such as:

- Deli tissue
- Single-use gloves
- Spatulas
- Dispensing equipment.

Tongs

What establishments are NOT allowed to practice bare hand contact procedures:

Establishments that serve highly susceptible populations are NOT allowed to handle foods with bare hands, which include:

- Health care facilities
- Assisted living facilities
- Childcare facilities



Food and Environmental Services 210-207-0135

Application for Bare Hand Contact Procedure (As specified in Food Code ¶ 3-301.11(E))

FDA Food Code: https://www.fda.gov/food/fda-food-code/food-code-2017

Please type or print legibly using black or blue ink

(Signature of legal representative of the facility listed above)

1. 2.	Establishment Name:	
3.	Responsible Person: Phone:	
	Legal Representative Business	
4.	List Procedure and Specific Ready-To-Eat-Foods to be considered for use of bare hand contact with ready-to-eat foods:	
(a) [·] mai	Handwashing Facilities: There is a handwashing sink located immediately adjacent to the posted bare hand contact procedure and the hand sink is ntained in accordance with provisions of the Code. (§ 5-205.11, § 6-301.11, § 6-301.12, § 6-301.14) □ YES □ NO (Include gram, photo or other information)	
	All toilet rooms have one or more handwashing sinks in, or immediately adjacent to them, and the sinks are equipped and ntained in accordance with provisions of the Code. (§ 5-205.11, § 6-301.11, § 6-301.12, § 6-301.14) YES NO	
6. food	Employee Health Policy: The written employee health policy must be attached to this form along with documentation that employees and conditional employees acknowledge their responsibilities. (§ 2-201.11, § 2-201.12, § 2-201.13)	
7.	 Employee Training: Provide documentation that food employees have received training in: a. The risks of contacting the specific ready-to-eat foods with bare hands b. Personal health and activities as they relate to diseases that are transmissible through food. c. Proper handwashing procedures to include how, when, where to wash, & fingernail maintenance. (§ 2-301.12, § 2-301.14 § 2-301.15, § 2-302.11) d. Prohibition of jewelry. (§ 2-303.11) e. Good hygienic practices. (§ 2-401.11, § 2-401.12) 	
	Documentation of Handwashing Practices: Provide documentation that food employees are following proper handwashing cedures prior to food preparation and other procedures as necessary to prevent cross-contamination during all hours of ration when the specific ready-to-eat foods are prepared or touched with bare hands.	
9. two •	Documentation of Additional Control Measures: Provide documentation to demonstrate that food employees are utilizing or more of the following control measures when contacting ready-to-eat foods with bare hands: Double handwashing; Use of nailbrushes;	
•	Use of hand antiseptic after handwashing; Incentive programs such as paid leave encouraging food employees not to work when they are ill; or Other control measures approved by the regulatory authority.	
eme	ent of Compliance:	
ona bition y-to cent ersta	all of the following: All food employees are individually trained in the risks of contacting ready-to-eat foods with bare hands, I health and activities as they relate to diseases that are transmissible through food, proper handwashing procedures, on of jewelry, and good hygienic practices. A record of this training is kept on site. I understand that bare hand contact with eat food is prohibited except for those items listed in section four (4) above. A handwashing sink is located immediately to the posted bare hand contact procedure. All handwashing sinks are maintained with hot water, soap, and drying devices. I and that documentation is needed for handwashing practices and additional control measures. I understand that records to the handwashing are kept current and kept on site.	
ΙΔΤ	URE: DATE	