

# USING BARE HAND CONTACT WITH READY-TO-EAT FOODS

## ALTERNATIVE OPERATING PROCEDURES

Hawaii Administrative Rules (HAR) 11-50 prohibits bare hand contact with ready-to-eat (RTE) foods. The public health concern associated with handling RTE foods with bare hands is the possible contamination of these foods with harmful bacteria and viruses that can get transferred to food from hands, causing foodborne illness.

Food establishments may handle RTE foods with bare hands if they submit written procedures that meet all the requirements stated in HAR 11-50-32 (a)(4)(A)-(G) and are approved by the Department of Health.

This checklist is intended to provide guidance to ensure food establishments have all the required information to complete their written procedures.

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### CHECKLIST FOR USING BARE HAND CONTACT WITH READY-TO-EAT FOODS

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- List the specific RTE foods that would be touched by bare hands
- Diagram(s) showing location of handwashing sinks in relation to work stations; supplied with soap and paper towels
- Documentation that hands are washed before food preparation and as necessary to prevent cross contamination by food employees during all hours of operation when the specific RTE foods are prepared 11-50-22 (a)-(d)
- Documentation that corrective action is taken when written procedures are not followed

**WRITTEN EMPLOYEE HEALTH POLICY:** Policy must include or state the following:

- Food employees acknowledge that they have been informed to report information about their health and activities as they relate to gastrointestinal symptoms and diseases that are transmittable through food *HAR 11-50-21(a)(1)*
- Food employees acknowledge their responsibilities for notification *HAR 11-50-21(a)(5)*
- Person in charge acknowledges the responsibilities for notification *HAR 11-50-21(a)(2)-(4), (b), and (c)*

**EMPLOYEE TRAINING:** Documentation that all food employees acknowledge they received training in the following topics:

- Risks of contacting the specific RTE foods with bare hands
- Proper handwashing techniques *HAR 11-50-22 (b)*
- When to wash their hands *HAR 11-50-22 (c)*
- Where to wash their hands *HAR 11-50-22 (d)*
- Proper fingernail maintenance *HAR 11-50-22 (f)*
- Prohibition of jewelry *11-50-22 (g)*
- Good hygienic practices *11-50-22 (a) and (b)*

**CONTROL MEASURES:** Establishment must use at least 2 of these control measures:

- Double handwashing
  - Nail brushes
  - A hand antiseptic
  - Incentive programs such as paid sick leave that assist or encourage food employees not to report to work when they are ill
  - Other control measures approved by the department
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