

Bare Hand Contact Plan for Ready-to-Eat Foods

Mission:

To Establish Active Managerial Control regarding Cross-Contamination, Personal Hygiene and Employee Health (Risk Factors and Interventions) in food operations that want to use bare hands to contact ready to eat foods.

Statistics show that improper food handling by a food employee is one of the most common causes of foodborne illnesses. However, if proper knowledge and training are present, food employees can prevent the transfer of bacteria from hands to the customer's food.

The Wisconsin Food Code states that food employees cannot handle ready-to-eat foods with their bare hands. Ready-to-eat foods are defined as foods that are in a form that will be consumed without additional washing, cooking or preparation. Employees can use tongs, utensils, deli tissue or gloves to prevent the direct contact with ready-to-eat foods. However, the Wisconsin Food Code includes an exemption that allows employees to have bare hand contact with ready-to-eat foods if an approved program is present.

The following is a step-by-step process that can be used as a template to develop a bare hand contact program. A separate packet is included to provide you with additional training information.

Step 1 - Bare Hand Contact plan

(Bare Hand Contact Worksheet - Attached)

Step 2 – Training Program

(Employee Training Checklist – Attached)

Describe the employee training program (list the training material used and frequency of training). Employee training must include, but is not limited to the following topics:
(see BHC Supplement for training ideas)

- Handwashing Practices
- Cross-contamination
- Employee Health

Bare Hand Contact Plan Worksheet

This plan shall be updated or reviewed at least annually, or when a menu change occurs that impacts this plan. The Bare Hand Contact Plan is to be maintained in a current state, readily available to your health inspector/ regulator.

Establishment:

Date of Plan:

Person in Charge:

Title:

A List the work/task areas where BHC work will be allowed

B For each of the above work/task area, describe how foods will be handled in this area to prevent cross-contamination to hands and/or ready-to-eat foods.

Signature of Manager

Employee Training Checklist

Employee Name:

Date:

My signature below indicates that, for each item checked, I have received training, I understand the issue, and I agree to comply.

- 1. Handwashing Practices
- 2. Cross-Contamination
- 3. Employee Health
- 4. Bare-Hand Contact Plan

Signature of Employee

Signature of Manager

Sample Bare Hand Contact Plan

“Nieces” is a small sandwich shop operating in several large metropolitan areas. They bake their own bread daily, buy their meats and cheeses and vegetables in bulk, and cook a few menu items from scratch. Their operation can be broken down into 3 parts:

- Bread preparation
- Pre-prep
- To-order sandwich prep.

They are requesting bare hand contact of RTE ingredients during the “to-order sandwich prep” stage. This will include bare hand contact with the bread. It does NOT include bare hand contact with RTE foods during the slicing and portioning stages. Here is their plan:

Establishment: Nieces

Date of Plan January 21, 2002

Person in Charge: Susan Niece

Title: General Manager

A. Work station location, purpose, or description:

The sandwich table is located on the front line, and includes the bread racks located near the table.

Product Categories Included

Deli meats

Sliced Cheese

Sliced raw vegetables

Sub and sandwich rolls (on bread rack)

Add any additional description of product or process as needed

N/A

Products Categories excluded

Raw animal meats

B. Describe any potential cross-contamination issues, and how you will prevent/avoid them:

There are 2 products held in this table that are not RTE. These consist of pre-portioned ribeye steaks and raw chicken breasts. These items are cooked on the small grill. They will be handled only with tongs that are to be used exclusively for those products only.

All production employees will wash their hands thoroughly before assuming their workstations. Once in place, these workers will never touch a raw product, nor will they handle money. The hand wash station is conveniently located so additional hand washing can occur as needed.

The only deviation from this plan may occur during slow between-meal times, when only one employee may be in this area. In that case, hand washing will always occur between handling money and touching any RTE food.

Attachment Plan

Implementing the Plan

It is recommended that you notify your Regulatory Authority when you are ready to implement your bare-hand-contact plan. Your inspector may choose to come out immediately to verify compliance, or may choose to wait until the next scheduled inspection. It is not required that “permission” be given, because this is not a variance, it is an approval. As long as you are meeting all the conditions and stipulations, your plan is “approved”.

What happens if we violate our plan?

The food code requires that you not touch ready-to-eat food with bare hands except as approved by the Regulatory Authority. Your plan is your approval. If you fail to abide by your plan, it is a violation (in this case a “critical”) of the food code, and will be treated as any other critical violation. Depending upon the jurisdiction in which your establishment is located, this may result in a required re-inspection that may or may not incur an additional fee. Continued failure to comply could result in fines or citations, court appearances, or a loss of license. See attachment 11 for enforcement supplement.

Additional Suggestions

1. Post prominent signs in the areas where bare hand contact with RTE foods is or is not allowed. For example, a sub sandwich shop may use direct hand contact in the final sandwich assembly area, but not at the slicer where RTE meats and cheeses are sliced and pre-portioned. Each area should have an appropriate sign reminding employees of glove use.
2. Maintain signs in break areas, near the time clock, or wherever employees congregate, reminding them of the importance of good personal hygiene. (Attachment 10)
3. It is strongly recommended that each establishment create and use a daily checklist that verifies that soap, towels, and tempered water are available in every food preparation area.