Bare Hand Contact with Ready-to-Eat Foods - Questions and Answers

These general guidelines for applying the Rules and Regulations Governing Retail Food Establishments in the State of Colorado are provided by the Colorado Department of Public Health and Environment, Division of Environmental Health & Sustainability. Additional information about the rules and regulations may be obtained by calling 303-692-3645, or visiting the Division’s web page - www.cdphe.state.co.us/cp

Background
Although hand washing is critical for food safety, recent studies indicate that hand washing alone is not enough to prevent foodborne illnesses. The main reason for not touching ready-to-eat foods with bare hands is to prevent viruses and bacteria, which are present in your body, from contaminating the food. Viruses and bacteria are not visible to the naked eye, but may be present on your hands if you do not wash them thoroughly, particularly after using the bathroom. The Colorado Retail Food Establishment Rules and Regulations prohibits bare hand contact with ready-to-eat foods and requires good hand washing by food service workers.

How can we prevent contamination from being passed by the food we prepare or serve?
You can minimize contamination being passed to your customers by washing your hands, being very careful not to cross-contaminate food, not contacting ready-to-eat foods with bare hands, and by maintaining a high level of personal hygiene. Simply being aware of the potential dangers, and attempting to minimize them is a very large step in the right direction.

When am I required to wash my hands?
- When returning to the kitchen after using the toilet room.
- After coughing, sneezing, using a handkerchief or disposable tissue, using tobacco, eating, or drinking.
- When switching between working with raw foods of animal origin and working with ready-to-eat foods.
- After touching bare human body parts other than clean hands and clean, exposed portions of arms.
- During food preparation as often as necessary to remove soil and contamination and to prevent cross-contamination when changing tasks.
- Before putting on single-use gloves for working with food, and between removing soiled gloves and putting on clean gloves.
- After handling soiled equipment or utensils.
- After caring for or handling any animals.
- After engaging in any activities that contaminate the hands.

What is good hand washing?
All employees involved with food preparation must wash their hands and exposed portions of their arms with soap and water. Thorough hand washing is done by vigorously rubbing together the surfaces of lathered hands and arms for at least 20 seconds followed by a thorough rinse with clean water. Use a single-service towel or hot air dryer to dry hands. No special soaps, such as antibacterial soap, are needed. Hand sanitizers may be used following appropriate hand washing, but not in place of hand washing.

What kinds of foods are considered ready-to-eat and may not be touched with bare hands?
- prepared fresh fruits and vegetables served raw
- salads and salad ingredients
- cold meats and sandwiches
- shredded cheese
- bread, toast, rolls and baked goods
- garnishes such as lettuce, parsley, lemon wedges, potato chips or pickles
- fruit or vegetables for mixed drinks during preparation activities
- ice
- any food that will not be thoroughly cooked or reheated after it is prepared
Bare hand contact is allowed for foods, which will be cooked, such as pizza toppings, raw meats, and ingredients for recipes prior to cooking.

How can I prepare or serve ready-to-eat food while avoiding contact with my bare hands?

You may use any of the following utensils to prepare or serve foods without bare hand contact:

- tongs
- forks and spoons
- deli paper
- disposable gloves
- waxed paper
- scoops
- spatulas

Am I required to wear disposable sanitary gloves?

No. The regulation does not require gloves to be worn, but does require that ready-to-eat foods be prepared and served without bare hand contact. Wearing disposable sanitary gloves is one of several acceptable ways to comply with the regulation. Remember that gloves are just an extension of your hands. If the gloves become soiled, they can pass contamination just as easily as unclean hands.

When do I have to replace or change gloves?

Always change gloves if the gloves are ripped, torn, or contaminated. Contamination can occur after using the toilet room, smoking, coughing, sneezing, and preparing raw foods. You should always remove your gloves before you leave your station, and then wash your hands. Food worker hands must be washed and dried thoroughly before putting on new gloves.

What is the "right way" to change gloves?

Remove and throw away the old gloves. Thoroughly wash and dry your hands. Put on a clean fresh pair of gloves without touching anything else.

Is a short order cook required to wear gloves?

The short order cook may not touch ready-to-eat foods with bare hands. Disposable gloves are one possible way to prevent bare hand contact with ready-to-eat foods. Another way is to use utensils such as forks, tongs, spatulas, or splitting tasks between more than one individual where possible.

Are there concerns about use of gloves and latex allergy?

Food establishment employees who repeatedly use latex gloves may be at risk of developing sensitivity to latex. Allergens from the gloves could be transferred to the food, and may cause a reaction in allergic individuals. Good substitutes for latex gloves are available and include vinyl, nitrile, polyvinyl, chloroprene, or polyethylene gloves, deli tissues and tongs.

Are there alternatives other than using utensils or gloves?

Yes. Some establishments have obtained an approved Bare Hand Contact Exemption, which allows them to touch ready-to-eat foods with bare hands. The parameters of this exemption typically include, but are not limited to frequent hand washing and the maintenance of a hand washing record. Failure to comply with the parameters of an exemption could result in a revocation of this exemption by the regulatory agency.

What should I do with a ready-to-eat food item if it was touched with bare hands?

You can either heat the food thoroughly to the temperature required for cooking or reheating, or discard the food, if it was touched with bare hands.

Where can I learn more about hand washing and bare hand contact with ready-to-eat foods?

Your local health department can answer questions or give you more information about hand washing, bare hand contact with ready-to-eat foods, and additional important information on preventing foodborne illnesses.