

Michigan Department of Agriculture Food and Dairy Division

A GUIDE TO DEVELOPING A WRITTEN ALTERNATIVE PRACTICE AND PROCEDURE FOR BARE-HAND CONTACT WITH READY-TO-EAT FOODS

This draft document is for educational purposes only and should not be considered a replacement to reading the Food Code and Michigan Food Law of 2000, copies of which are available at www.mda.state.mi.us

Background

A person's hands can contain harmful bacteria and viruses that may cause foods to be unsafe to eat. Therefore, it is very important to reduce bare-hand contact with foods that are ready-to-eat (RTE), since these foods will not be cooked, washed or have any additional preparation, before being eaten by your customers. Consequently, the safety of a RTE food is controlled by the person, or persons, who prepare and handle that food before it is served.

The Michigan Food Law of 2000 prohibits bare-hand contact with ready-to-eat foods (see § 3-301.11, *Food Code*). However, a license holder may implement an alternative practice and procedure that allows bare-hand contact under controlled circumstances. Section 6151 of the Food Law of 2000 specifies the requirements for such an alternative procedure. In general, management must implement very specific alternative practices and procedures required by section 6151, and develop a written plan documenting their alternative procedures.

What is this guide designed to do?

The purpose of this guide is to provide a step-by-step explanation on developing a written Alternative Practice and Procedure (APP), if you desire to handle RTE foods with bare hands. By reading this guide, you will learn the steps that must be followed to develop an effective APP. These steps include:

- 1) Evaluating alternatives to bare-hand contact and documenting the reasons why they are impractical.
- 2) Documenting consistent compliance with critical requirements of the Food Code.
- 3) Identifying specific work areas where RTE foods will be handled with bare hands.
- 4) Identifying employee positions where RTE foods will be handled with bare hands.
- 5) Identifying the food preparation steps where RTE foods will be handled with bare hands.
- 6) Training new and existing employees, that will handle RTE foods with bare hands, about proper hand washing, the dangers of cross-contamination, and general sanitation.
- 7) Ensuring that hands are washed when necessary, and that an approved hand sanitizer is used after proper hand washing.

- 8) Monitor employee health -- ensuring that RTE foods are not handled by employees who are infected with disease-causing microorganisms that could be transferred through foods and food contact surfaces.
- 9) Describing how your establishment will monitor employees to ensure that correct food handling procedures are followed, as well as what to do if a RTE food becomes contaminated. Monitoring employees to ensure that the practices and procedures are being followed.
- 10) Periodic review of operations and the alternative practices and procedures. Maintaining and updating your APP records so that the procedures are always useful to your establishment and staff. This includes a minimum of at least one documented annual review of your APP.

Now, let's look at the individual steps that are involved in producing an APP to handle RTE foods with bare hands. Our example will be the preparation of a chef salad.

Step 1: Evaluate Alternatives to Bare-Hand Contact.

- ~ State what alternatives to bare-hand contact were considered.
- ~ List the specific reasons why the alternatives were judged to be impractical in the facility.

Step 2: Document Consistent Compliance with Critical Requirements.

- ~ Attach copies of last three inspection reports documenting consistent compliance with 1999 Food Code requirements or equivalent provisions of previous laws.

Step 3: Identify Specific Work Areas Where RTE Foods Will Be Handled With Bare Hands.

- ~ Look at your menu and identify each recipe where you want to handle RTE foods with bare hands.
- ~ Determine the workstation where the RTE food will be handled with bare hands. (*Remember, a RTE food is one that will not be cooked, washed or receive any additional preparation before being served to your customers.)

APP Example: You review your recipe and determine that a Chef Salad is a RTE food. The food preparation step and station where hands will be used are: assembling the ingredients of the Chef Salad on the cook line.

Step #4 Identify the Employee Positions That Will Be Handling RTE Food with Bare Hands

- ~ Determine which of your staff will be handling the RTE foods with bare hands.
- ~ List the title(s) of the employee positions where RTE foods will be handled with bare hands.

APP Example: A Line Cook will be assembling the Chef Salad.

Step #5 Identify the Food Preparation Processes Where Bare Hands Will Be Used

- ~ Look at your recipe and list the steps that involve the use of bare hands.

APP Example: The preparation steps where the Chef Salad will be handled with bare hands are: placing precut cucumber, lettuce, cheese, tomato, cooked ham and cooked chicken in an individual salad bowl.

At this point, you have indicated 1) which RTE foods will have bare-hand contact, 2) where they will be handled, 3) who will handle the foods, and 4) how the foods will be handled.

Now you need to document a food safety training program that will result in your employees knowing how to safely use bare hands with foods.

Step #6 Practice and Document Your Food Safety Training Program

- ~ Plan, practice and document that a food safety training plan is in place for all of your employees that will be handling RTE foods with their bare hands. These resources should teach personal hygiene, how to prevent cross-contamination, proper food storage, thawing, cooking, hot holding, re-heating, and sanitation of food equipment, utensils, and food preparation surfaces.

APP Example: Document that each employee will be trained with accepted food safety training resources, such as videos or manuals. Have a signed written record that each employee has received and understood the food safety training.

Step #7 Ensure That Employees Wash Hands Whenever Necessary and Use Other Preventative Measures

- ~ Train all employees in proper hand washing techniques.
- ~ Train employees in the proper use of an approved hand sanitizer or any other elective preventative measures used.

Example: Your APP states that you demonstrate proper hand washing techniques, including the use of hand sanitizer, to each employee that will handle RTE foods. You also record observation of the employee to see if they wash and sanitize hands correctly, perhaps making spot checks every hour.

Step #8 Monitor Employee Health Status to Reduce Transmission of Foodborne Illness

- ~ Observe your employees to determine whether they may be infected with harmful organisms that could be transmitted by food handling activity.

~ Employees cannot handle foods, clean equipment, utensils or linens, or unwrapped single service articles if they have been diagnosed with *Salmonella typhi*, *Shigella*, *E. coli* 0157:H7 or Hepatitis A virus, or show symptoms such as diarrhea, fever, vomiting, jaundice or sore throat with fever, or have a persistent cough, sneezing or runny nose. Boils and infected wounds must be protected and covered.

APP Example: Put statements in your APP plan explaining how you will observe and recognize the signs of diseases that could be transmitted by infected employees through RTE foods.

Step #9 Provide Documentation That You Monitor Employees While They Handle Food With Bare Hands, and That You Have Alternative Procedures When Foods Become Contaminated

- ~ Determine the best way for you to monitor your employees. Monitoring methods may include hand wash logs or automatic counters.
- ~ Create written plans of action that will be taken when foods or hands become contaminated. If a RTE food is improperly handled, then you must take corrective action, such as
 - re-training the employee,
 - discarding the contaminated food,
 - using sanitary gloves, and/or
 - excluding or restricting ill employees.

- ~ Document your corrective actions.

APP Example: Your APP describes how and when you monitor employees, and what you do when they contaminate their hands or RTE foods.

Step #10 Document When You Will Update Your APP Plan

- ~ Recognize that your recipes may change, and that you may need to change various parts of your APP plan whenever necessary.

APP Example: Document when you plan to review your APP plan (at least once per year), and keep the entire APP plan available for review by your establishment and staff.