



**COUNTY OF EL DORADO  
COMMUNITY DEVELOPMENT AGENCY  
DIVISION OF ENVIRONMENTAL MANAGEMENT**

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**ALTERNATIVE OPERATING PROCEDURES  
To Use Bare Hand Contact with Ready-to-Eat Food**

Section 113961 of the California Retail Food Code (CalCode) prohibits bare hand contact of food employees with ready-to-eat food. Food operators may allow food employees to use bare hand contact with ready-to-eat food only to serve non-highly susceptible populations. The permit holder must obtain prior approval from the regulatory authority and make their written operating procedures available upon request. Written procedures must include a description of the proposed procedures for bare hand contact and documentation of proper handwashing practices, an employee health policy and documentation of completed required employee training.

This checklist is intended to provide guidance in completing alternative operating procedures for facilities that wish to use bare hand contact with ready-to-eat food to serve non-susceptible populations. You can use this checklist to ensure you have all the required information and submit along with your written procedures to your local enforcement agency for review and approval.

**Bare hand contact should only be done in rare circumstances and always following the procedures approved for the facility by the local enforcement agency.**

**CHECKLIST FOR USING BARE HAND CONTACT WITH READY-TO-EAT FOOD**

Facility Name: \_\_\_\_\_ Health Permit Number: \_\_\_\_\_

Facility Address: \_\_\_\_\_ City: \_\_\_\_\_ State: CA Zip: \_\_\_\_\_

Person in Charge: \_\_\_\_\_ Title: \_\_\_\_\_ Phone: \_\_\_\_\_

Fax: \_\_\_\_\_ E-Mail: \_\_\_\_\_

Mailing Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

**SECTION I: BARE HAND CONTACT PROCEDURES**

Describe your proposed alternative procedures for bare hand contact and list the specific ready-to-eat foods that would be touched by bare hands.

**SECTION II: HANDWASHING PROCEDURES / HANDWASHING SINKS**

Provide diagram(s) and other information showing the location of all handwashing facilities. Documentation must indicate that sinks are properly installed, maintained, are easily accessible and in close proximity to the work station where bare hand contact procedure is conducted.

Check when completed	Your handwashing procedures must include or state all of the following:
	Diagram(s) showing location of all handwashing facilities in relation to work stations with bare hand contact procedures are conducted is attached for review
	Accessible handwashing sinks are installed in all necessary areas and kept clean and unobstructed
	All handwashing sinks are provided with warm water that reaches at least 100°F
	All handwashing sinks are provided with soap, single-use towels or a heated-air hand drying device

**Attach written handwashing information to the proposed procedure(s) submitted for approval to your local agency.**

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

## **SECTION III: WRITTEN EMPLOYEE HEALTH POLICY**

Written policy must detail the manner in which the food facility complies with CalCode sections 113949, 113949.1, 113949.2, 113949.4, 113949.5, 113950 and 113950.5.

Check when completed	Written employee health policy must include or state all of 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
	Food employees acknowledge their responsibilities for notification
	Person in charge acknowledges the responsibilities for notification

**Attach written employee health policy to the proposed procedure(s) submitted for approval to your local agency.**

## **SECTION IV: EMPLOYEE TRAINING**

Written policy must document that all food employees acknowledge they have received training in all the following areas.

Check when completed	Topics covered:
	Risks of contacting specific ready-to-eat foods with bare hands
	Proper handwashing techniques and requirements
	Where to wash their hands
	Proper fingernail maintenance
	Prohibition of jewelry
	Good hygienic practices

**Attach written employee training policy to the proposed procedure(s) submitted for approval to your local agency.**

## **SECTION V: PREVENTING CROSS CONTAMINATION**

Include the following statement: "Hands are washed before food preparation and as necessary to prevent cross-contamination by food employees, as specified in Sections 113952, 113953.1, and 113953.3 during all hours of operation when the specific ready-to-eat foods are prepared."

## **SECTION VI: CONTROL MEASURES**

Written policy must document that food employees contacting ready-to-eat foods with bare hands use two or more of the following control measures to provide additional safeguards to hazards associated with bare hand contact.

Check when completed	Possible control measures: Facility must use at least two of these control measures
	Double handwashing
	Nail brushes
	A hand antiseptic after handwashing, as specified in Section 113953.4
	Incentive programs such as paid sick leave that assist or encourage food employees not to report to work when ill
	Other control measure approved by the local regulatory authority

**Attach written control measures to the proposed procedure(s) submitted for approval to your local agency.**

## **SECTION VII: CORRECTIVE ACTIONS**

Written policy must document that corrective actions will be taken when requirements specified above are not followed.

**ACKNOWLEDGMENT:** I understand that this facility can only use these procedures to serve non-susceptible populations and must operate according to these operating procedures each day the establishment is in operation when using bare hand contact with ready-to-eat food.

**Name:** \_\_\_\_\_ **Title:** \_\_\_\_\_ **Signature:** \_\_\_\_\_  
Please Print

**E-mail address:** \_\_\_\_\_ **Date:** \_\_\_\_\_