

Fact Sheet: No Bare Hand Contact (NBHC) with RTE foods

Definition:

Ready-to-eat-Food

Ready-to-eat (RTE) food is ready to be consumed and does not require any additional heat treatment steps to make it safe. Food that typically should be cooked further to render it safe, such as a rare hamburger or a sauce containing raw eggs, can also be considered ready-to-eat provided the consumer has been advised of the potential risks and orders the food undercooked.

Why is bare hand contact with RTE foods hazardous?

Food that is **ready-to-eat** may become contaminated by food handlers' bare hands. **Even properly washed hands can contaminate foods**. Although thorough and frequent handwashing can reduce this risk, it does not eliminate it.

Examples of Ready to Eat foods:

- ❖ Cooked foods
- ❖ Washed fresh fruits and vegetables
- ❖ Salads and salad ingredients
- ❖ Garnishes such as parsley or lemon wedges
- ❖ Cold meats and sandwiches
- ❖ Raw sushi ingredients including fish, vegetables and rice
- ❖ Bread, toast, rolls, and baked goods

“Ready-to-eat food” is not cooked again before it is eaten, so harmful microorganisms from bare hands will not be killed and can cause foodborne illness.

What can be used to handle ready to eat foods to prevent bare hand contact?

Food employees can handle ready-to-eat food without touching it with bare hands by using any of the following utensils or tools to create a barrier between hands and RTE foods:

- Clean, single-use disposable gloves
- forks, tongs, scoops and spatulas
- deli paper
- toothpicks

What activities can be safely performed with bare hands?

- Preparation of raw foods prior to the cooking process
- Washing of whole fruits and vegetables

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Food establishments that wish to handle RTE foods may do so by applying for a variance from no bare hand contact and complying with the requirements in the approved variance:

(Note- Variance from No Bare Hand Contact (NBHC) is not available to establishments serving highly susceptible population such as nursing homes, hospitals and childcare centers.)

1. Obtain prior written approval from the Department.
2. Written procedures are maintained onsite and available that describe:
 - a. A listing of the specific RTE foods that are touched by bare hands
 - b. Diagrams showing the properly equipped handwashing facilities that are in close proximity and easily accessible to where the bare hand procedure is conducted
3. Written employee health policy that includes:
 - a. Documentation that food employees and conditional employees acknowledge they are informed to report information about their health and activities as they relate to gastro-intestinal (GI) symptoms and diseases that are transmissible through food.
4. Documentation that food employees acknowledge they have received training in:
 - a. The risks of contacting the specific food items with bare hands
 - b. Proper handwashing
 - c. When to wash their hands
 - d. Where to wash their hands
 - e. Proper fingernail maintenance
 - f. Prohibition of jewelry
 - g. Good hygienic practices
5. Documentation that hands are washed before food preparation and as necessary to prevent cross contamination during all hours of operation when the specific RTE food items are prepared.
6. Documentation that food employees contacting RTE food with bare hands use two or more of the following control measures:
 - a. Double handwashing
 - b. Nail brushes
 - c. Hand antiseptic after handwashing
 - d. Incentive programs such as paid sick leave to encourage food employees not to work when they are ill
7. Documentation that corrective actions are taken when Requirement 6 a-d are not followed.

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Application for Bare Hand Contact Procedure:

An application for approved bare hand contact procedure is available at http://health.state.tn.us/EH/food_service.htm

Once a complete application is received by the Department, notification of the Department's decision will be provided to the operator within 60 days.

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

Except under an approved variance, RTE foods handled with bare hands must either be:

- Properly cooked or reheated, or
- Discarded.

Proper handwashing is crucial. Food handlers are required to wash their hands:

- When entering a food preparation area.
- Before putting on clean, single-use gloves for working with food.
- Immediately before engaging in food preparation.
- Before handling clean and single-use equipment and utensils.
- During food preparation, as often as necessary to remove soiling and contamination and to prevent cross-contamination when changing tasks.
- When changing tasks and switching between handling raw foods and working with ready-to-eat foods.
- After using the toilet room.
- After engaging in other activities that contaminate the hands or gloves.