



**COUNTY OF SAN BERNARDINO  
DEPARTMENT OF PUBLIC HEALTH  
DIVISION OF ENVIRONMENTAL HEALTH SERVICES**

**Alternative Operating Procedures  
Checklist for Using 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 to serve non-highly susceptible populations with approval from the Division of Environmental Health Services (DEHS). 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 provides guidance in completing alternative operating procedures for facilities that wish to use bare hand contact with ready-to-eat food to serve non-highly susceptible populations. Submit this checklist to DEHS along with your written procedures. **Bare hand contact should only be used in rare circumstances and always following the procedures approved for the facility by DEHS.**

GENERAL CONTACT INFORMATION			
Facility Name		Permit No. (PR #)	
Facility Street Address		City	State      Zip Code
Mailing Address (If different from above)		City	State      Zip Code
Phone Number	Fax Number	Email Address	
Name of Owner		Person in Charge (if different than owner)	
SECTION I: BARE HAND CONTACT FACILITY DOCUMENTATION			
<input type="checkbox"/> Provide specific written procedures List the bare hand contact procedures at your facility and the specific ready-to-eat foods touched by bare hands. See example below. Use separate sheet(s) of paper and attach to this application.			
<b>Bare hand contact procedure(s)</b>		<b>Ready-to-eat foods touched by bare hands</b>	
Example: Slicing lemons at the drink bar after washing hands		Lemons	
SECTION II: HANDWASHING PROCEDURES • HANDWASHING SINKS			
Provide diagram(s) and other information on separate sheet(s) of paper 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.			
Handwashing facility documentation must include or state all of the following:			
<input type="checkbox"/> Diagram(s) showing location of all handwashing facilities in relation to work stations where bare hand contact procedures are conducted is attached for review			
<input type="checkbox"/> Accessible handwashing sinks are installed in all necessary areas and kept clean, unobstructed, and in good repair			
<input type="checkbox"/> All handwashing sinks are provided with warm water that reaches at least 100°F			
<input type="checkbox"/> All handwashing sinks are provided with soap, single-use towels or a heated-air hand drying device			
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. Use separate sheet(s) of paper and attach to this application.			
Written employee health policy must include or state all of the following:			
<input type="checkbox"/> 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			
<input type="checkbox"/> Food employees acknowledge their responsibilities for notification			
<input type="checkbox"/> Person in charge acknowledges the responsibilities for notification			

**SECTION IV: EMPLOYEE TRAINING**

Written policy must document that all food employees acknowledge they have received training in all of the following areas. Use separate sheet(s) of paper and attach to this application.

Topics covered:

- Risks of contacting specific ready-to-eat foods with bare hands
- Proper handwashing techniques and requirements
- Where to wash hands
- Proper fingernail maintenance
- Prohibition of jewelry
- Good hygienic practices

**SECTION V: PREVENTING CROSS CONTAMINATION**

- Include the following statement along with written documentation: "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 of CalCode during all hours of operation when the specific ready-to-eat foods are prepared."

**SECTION VI: CONTROL MEASURES**

Written policy must document that all 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. Use separate sheet(s) of paper and attach to this application.

Possible control measures: Facility must use at least two (2) of these control measures:

- Double handwashing
- Nail brushes
- Hand antiseptic after handwashing (as specified in Section 113953.3 of CalCode)
- Incentive programs such as paid sick leave that assist or encourage food employees not to report to work when they are ill
- Other control measure approved by DEHS

**SECTION VII: CORRECTIVE ACTIONS**

- Written policy must document that corrective actions will be taken when requirements specified above are not followed. Use separate sheet(s) of paper and attach to this application.

**ACKNOWLEDGEMENT**

I understand that this facility can only use these procedures to serve non-susceptible populations. I understand this facility must operate according to these operating procedures each day the establishment is in operation when using bare hand contact with ready-to-eat food. Furthermore, I understand that approval (if received) for alternative operating procedures is specific and applies only to the facility stated above.

Bare hand contact should only be used in rare circumstances and always follow the procedures approved for the facility by the County of San Bernardino Department of Public Health Division of Environmental Health Services.

Signature	Title	Date
Print Name	Email Address	

<b>OFFICE USE ONLY</b>	<b>OFFICE USE ONLY</b>	<b>OFFICE USE ONLY</b>
Approved by (Print Name)	Signature	Date