



Division of  
Hotels & Restaurants



## INSIDE:

1. Establish  
an effective  
Alternate  
Operation  
Plan p.2
2. AOP Step  
by Step p.2
3. Training  
and  
Testing  
Changes  
p.4

Food For Thought:

***Nothing touches  
everyday people  
every day like  
food safety!***

# Food Safety Quarterly

Department of  
Business and  
Professional  
Regulation

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*General food safety information to educate the Florida restaurateur*

## **DON'T GET CAUGHT BARE HANDED!** The Centers for Disease Control says, "Handwashing is the Single Most Important Means of Preventing the Spread of Infection."

Public restrooms are potential sources of disease transmission, according to a study by the University of Arizona, presented at a meeting of the American Society for Microbiology. Salmonella was found in 3% of the sites tested while *Staphylococcus aureus* was on 15% of the tested surfaces.

Because these pathogens can have serious, even life threatening consequences, this study provides an ideal opportunity to remind all of us of the importance of proper handwashing in controlling the spread of bacteria. Washing hands correctly will greatly reduce the chances of spreading germs and can reduce foodborne illnesses, which the CDC says adds to health care costs that exceed \$4 billion in the U.S.

Improper handwashing can increase the spread of infectious diseases, which are the third leading cause of death in the United States. The Centers for Disease Control estimates nationally, foodborne illness kills 5,000 people a year and 5 million more become ill.

The subject of how and when to wash your hands is emphasized in the newly required Food Service Employee Training mandated by Florida law.

This edition of the Food Safety Quarterly, published by the Department of Business and Professional Regulation, Division of Hotels and Restaurants, will assist you to develop a written Alternative Operational Procedure for bare-hand contact with Ready-To-Eat Foods. (Continued on Page 2.)

### **TRAINING AND TESTING PROGRAMS CHANGE** **Employee Training**

All food service employees who are responsible for storage, preparation, display, or service of foods in public food service establishments regulated by the Division of Hotels and Restaurants must be trained and certified on the food safety standards set forth in Section 61C-4.023(6), Florida Administrative Code, and the edition of the U.S. Food and Drug Administration Food Code currently adopted by the division. Training topics include professional personal hygiene and foodborne disease prevention.

### **Food Service Manager Training**

Effective February 15, 2001, the division will no longer provide a State of Florida examination, but will instead recognize any certification awarded by those organizations approved by the Conference for Food Protection. Individuals certified prior to February 15<sup>th</sup> by the University of South Florida, the division's previous primary vendor, will be honored through the expiration date on the card.

(More information on Page 4.)

As you already know, 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 an RTE food is completely controlled by the person, or persons, who prepare and handle that food before it is served.

Beginning April 1, 1998, the Florida Department of Business and Professional Regulation (DBPR) began to enforce Florida Administrative Rule 61C-4.010, which is an alternative to FDA Food Code 3-301.11.

Florida Administrative Rule 61C-4.010 provides you with an alternative to not handling RTE foods with your bare hands, *but* this provision has very specific procedures that you must follow to help reduce the risk of unwanted foodborne illness to your customer.

### **What is this guide designed to do?**

The purpose of this guide is to help you develop a Written Alternative Operational Procedure (AOP), *if you desire* to handle RTE foods with bare hands.

**IMPORTANT:** The AOP is only permitted for foods that will be prepared and served to your customers within 4 hours. If the time between preparation and serving is greater than 4 hours (the time that allows dangerous bacteria to multiply to harmful levels), then you cannot handle RTE foods with bare hands, and must follow the procedures found in FDA Food Code 3-301.11.

By reading this guide, you will learn the steps that must be followed to develop an effective AOP plan. These steps include:

1. Identifying:
  - A. specific work areas where RTE foods will be handled with bare hands
  - B. title of the employee positions where RTE foods will be handled with bare hands
  - C. actual food preparation steps that RTE foods will be handled with bare hands

2. Training employees that will handle RTE foods with bare hands about proper handwashing, the dangers of cross-contamination and general sanitation. It is also necessary to document that this training has been accomplished for each individual employee.
3. Ensuring that hands are washed when necessary, and that an approved hand sanitizer is used after proper handwashing.
4. 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.
5. Describing how your establishment will monitor employees to ensure that correct food handling procedures are followed, as well as what to do if an RTE food becomes contaminated.
6. Maintaining and updating your AOP records so that the procedures are always useful to your establishment and DBPR staff. This includes a minimum of at least one documented annual review of your AOP.

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

### **Step #1 Identify specific work areas where RTE foods will be handled with bare hands.**

What To Do: The first step is to look at your menu and identify each recipe where you want to handle RTE foods with bare hands, and you know that the food will be eaten within 4 hours. Next, determine the workstation where the RTE food will be handled with bare hands. (Remember, an RTE food is one that will not be cooked, washed or receive additional preparation before being served to your customers.)

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

**Step #2 Identify the employee positions that will be handling RTE food with bare hands.**

What To Do: Determine which of your staff will be handling the RTE foods with bare hands and list their job titles.

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

**Step #3 Identify the food preparation processes where bare hands will be used.**

What To Do: Look at your recipe and list the steps that involve the use of bare hands.

AOP Example: The preparation steps where the Chef Salad will be handled with bare hands are: Placing pre-cut 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 #4 Practice and document your food safety training program.**

What To Do: Plan, practice and document that a food safety training plan is in place for all of your employees who 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, reheating, and sanitation of food equipment, utensils, and food preparation surfaces.

AOP 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 #5 Ensure that employees wash hands whenever necessary, and use an approved hand sanitizer after proper handwashing.**

What To Do: Train all employees about proper handwashing techniques. For those that will handle RTE foods with bare hands, train them in the proper use of an approved hand sanitizer.

Example: Your AOP states that you demonstrate proper handwashing technique, including the use of hand sanitizer, to each employee that will handle RTE foods. You also record that you will observe the employee to see if he/she washes and sanitizes hands correctly.

**Step #6 Monitor employee health status to reduce transmission of foodborne illness.**

What To Do: 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* O157:H7 or hepatitis A virus, or show symptoms such as diarrhea, fever, vomiting, jaundice, sore throat with fever, or have a persistent cough, sneezing or runny nose.

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

**Step #7 Provide documentation that you monitor employees while they handle food with bare hands and that you have alternative procedures when foods become contaminated.**

What To Do: Determine the best way for you to monitor your employees, and what actions should be taken when foods or hands become contaminated. Monitoring methods include hand wash logs or automatic counters. If an 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.

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

### **Step #8 Document when you will update your AOP plan.**

What To Do: Recognize that your recipes may change, and that you may need to change various parts of your AOP plan whenever necessary.

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

If you need any further information about the Written Alternative Operational Procedure, call the Department of Business and Professional Regulation at:

1-800-749-6368  
or go online to  
*MyFlorida.com*

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Continued from Page 1

## **TRAINING AND TESTING PROGRAMS CHANGE**

### **Compliance Schedule:**

The division will implement compliance with the statutory requirements in the following manner:

1. First routine inspection after January 1, 2001: Inspectors will request proof of food worker training (certification cards, training roster sheet, etc.). If no proof of food worker training is present, the facility will be cited for a violation and will have until the next routine inspection to comply.
2. Second routine inspection after January 1, 2001: If no proof of food worker training is present and/or inadequate information concerning the training is provided, a warning notice will be issued on this violation and compliance verified at a call-back inspection in 30 days.

3. If the operator has not complied at the callback inspection, an Administrative Complaint will be issued to the establishment, seeking to compel the operator to comply with the training requirement.

## **Food Service Manager Training**

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The Conference for Food Protection and the division currently recognize the following accredited examination providers:

**Dietary Managers' Association:**  
800 323-1908 or [www.dmaonline.org](http://www.dmaonline.org)

**Experior Assessments:**  
800 200-6241 or [www.experioronline.com](http://www.experioronline.com)

**Florida Restaurant Association:**  
888 372-3926 or [www.flra.com](http://www.flra.com)

**The National Registry of Food Safety Professionals:**  
800 446-0257 or [www.nrfssp.com](http://www.nrfssp.com)

**Candidates must directly contact examination providers to arrange for examinations.**