



# **2012-2014 Hand Hygiene Committee Report**

**Orlando, Florida  
04 May 2014**

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**Presenters:**    **Michèle Samarya-Timm, MA, HO, MCHES, REHS, DAAS**  
                         **Somerset County (NJ) Department of Health**

**Angela Sanchez, MPA, REHS**  
**CKE Restaurants Holdings, Inc.**

# Discussion Topics



1. Key Topics
2. Handwashing Issues
3. Foodservice Glove Issues
4. Recommendations
5. Issues
6. Committee Thanks



# Committee Charges



Two key topics:

(1) Handwashing issues

(2) Gloving issues



# Handwashing Issues

## Committee Charge # 2



**Use the report of the 2010-2012 Committee as a reference, illustrating the interactions of scientific, regulatory and behavioral considerations related to alternative hand hygiene regimes compared to handwashing....**



# Handwashing Issues

## Committee Charge # 2



The committee should characterize what recent research tells us about:

- The extent to which the current minimum requirements for how and when employees are to wash their hands are effective in rendering food employees hands free of various soils, as well as, any pathogens of concern; and
- What other regimens for cleansing employees hands, if any, may deliver outcomes that are similar to or better than hand washing so as to suggest that they could be included as acceptable methods for rendering hands free of soil and pathogens.





# Handwashing Issues -- Outcomes

## Committee Charge # 2

**The Committee compiled list of possible alternatives to soap and water handwashing for purpose of discussion:**

- No handwash (i.e., do nothing)
- Gloves alone (with no handwashing interventions)
- Soap and water handwash (all variations, including with or without nailbrush, various timings, etc.)
- Soap and water handwash followed by hand antiseptic
- Hand antiseptic alone (gels, dips, wipes, sprays)
- Double application of hand antiseptic
- Stricter personal hygiene standards in lieu of more frequent handwashing
- Handwashing machines





# Handwashing Issues -- Outcomes

## Committee Charge # 2

- Assessing the effectiveness of current handwashing requirements necessitates a scientific approach.
- Committee agreed that literature reviews are necessary to evaluate this.
- Committee sought scientific literature on alternative approaches to soap and water handwashing and found there is limited literature available.





# Handwashing Issues -- Outcomes

## Committee Charge # 2

**No new studies (since last CFP) were identified that address:**

*“the extent to which the current minimum requirements for how and when employees are to wash their hands are effective in rendering food employees hands free of various soils, as well as any pathogens of concern”*

-or-

*“situations under which food employees are currently required to wash their hands does not result in meaningful risk reduction”*







# Handwashing Issues -- Outcomes

## Committee Charge # 2

Before evaluating available studies, there was question of how to assess credibility of literature.

Therefore, the Committee created a

*“List of Questions to Consider When Evaluating Studies of Alternative Handwashing Approaches”,*

which includes 21 questions on methodology, behavioral considerations, and sufficient scientific evidence.





# Handwashing Issues -- Outcomes

## Committee Charge # 2

Using this list of questions, the Committee looked at one of the alternate approaches –

**The Dual Cleanse Sanitize Protocol**

**aka: Sequential Application of Hand Antiseptic for Use in No-Water Situations (dubbed SaniTwice)**

**The Committee considered: “What information (if any) is lacking for this committee to recommend a dual-step hand sanitizer process of lieu of soap and water handwashing?”**





# Handwashing Issues -- Outcomes

## Committee Charge # 2

Using the list of “Questions to Consider When Evaluating Studies of Alternative Handwashing Approaches” **the committee reviewed the sole study identified specific to this process:**

SaniTwice: A Novel Approach to Hand Hygiene for Reducing Bacterial Contamination on Hands When Soap and Water Are Unavailable

Authors: SARAH L. EDMONDS, JAMES MANN, ROBERT R. MCCORMACK, DAVID R. MACINGA, CHRISTOPHER M. FRICKER, JAMES W. ARBOGAST, AND MICHAEL J. DOLAN

Journal of Food Protection, Vol. 73, No. 12, 2010, Pages 2296–2300





# Handwashing Issues -- Outcomes

## Committee Charge # 2

**After careful evaluation, Committee consensus is that many questions about the Dual-Cleanse Sanitize-Protocol could not be adequately answered due to missing or incomplete information.**

**(Details on questions and missing/incomplete information for this process/protocol is available in the committee report. )**





# Handwashing Issues -- Outcomes

## Committee Charge # 2

**Other concerns were identified:**

**The Dual-Cleanse-Sanitize-Protocol proposes using a hand antiseptic as a hand cleanser. There is no known FDA Center for Drug Evaluation and Research (CDER) approval for this use of a hand antiseptic.**

**This committee cannot recommend a process using a product that is not approved by CDER for that purpose.**





# Handwashing Issues -- Outcomes

## Committee Charge # 2

On the basis of the listed information gaps, numerous unanswered questions, and the need for further studies, the Hand Hygiene Committee consensus is to

**NOT RECOMMEND the Dual-Cleanse-Sanitize-Protocol  
aka: Sequential Application of Hand Antiseptic for Use  
in No-Water Situations (dubbed SaniTwice)**





# Handwashing Issues

## Committee Charge # 1

**More closely examine the current Food Code requirements for when employees are required to wash their hands using soap and running water.**

**If credible research suggests that one or more of the situations under which food employees are currently required to wash their hands does not result in meaningful risk reduction, work with FDA to explore whether those mandates could be modified, either in the Code itself or by recognizing when it is appropriate to waive the requirement (e.g., other approaches to hand hygiene are available and practiced.)**



# Handwashing Issues -- Outcomes

## Committee Charge # 1



### Hand contamination event chart created

The committee used this chart to outline food code points of 'when to wash' and to help facilitate discussion on areas where handwashing would reduce a food safety related risk and discern potential situations where handwashing might not make a significant difference.





# Handwashing Issues -- Outcomes

## Committee Charge # 1



**This hand contamination event chart may be a useful resource since it mirrors the FDA process of determining priority risk designations – However, the committee noted that the chart needs to be additionally supported by peer-reviewed science to augment subject matter expert perspectives.**



# Handwashing Issues -- Outcomes

## Committee Charge # 1



### **Risk from touching face / hair considered**

**Committee consensus: touching face and/or hair is not a significant food safety hazard. Although *Staphylococcus aureus* could be transferred to food after touching face/hair, PHF/TCS food would need to be subsequently temperature abused and the toxin produced in order to be a potential cause of the disease.**



# Handwashing Issues -- Outcomes

## Committee Charge # 1



**The committee could not reach consensus to recommend that touching face/hair be removed from the “when to wash” list in the Food Code.**

**However, the committee expressed the value of recommending further research that substantiates touching these areas poses minimal risk to food.**



# Handwashing Issues -- Outcomes

## Committee Charge # 1



**Defining handwashing, hand sanitizing and hand cleansing**

**Committee consensus: Definitions are inclusive and sufficient in the text of the Food Code: 2-301.12 Cleaning Procedure and 2-301.16 Hand Antiseptics.**



# Handwashing Issues -- Outcomes

## Committee Charge # 1



### Defining contamination

**Committee consensus:** Time constraints prevented discussion, as this item was not specified in the committee charge.



# Foodservice Gloves Issues

## Committee Charge # 1



### Charge 1 (continued):

**Determine if/when double gloving procedures would be acceptable without handwashing. If so, what would those acceptable procedures be?**

**Determine what glove criteria or standards would need to be met for a glove to be considered a utensil and not require handwashing.**





# Foodservice Glove Issues -- Outcomes

## Committee Charge # 1

**In reviewing the Food Code, the Committee discerned that the current FDA code does consider a glove as a Utensil in 1-201.10.**





# Foodservice Glove Issues -- Outcomes

## Committee Charge # 1

### Definition of a foodservice glove

**Committee consensus: recommend the following definitions be included in the Food Code:**

**Foodservice Glove – a non-porous SINGLE USE covering worn over the front and back of the hand during FOOD preparation or service, with the intention of preventing cross-contamination**





# Foodservice Glove Issues --

## Committee Charge # 2



### Amend 'When to Wash'

- HHC recommends amending Section 2.301.14 to clarify handwashing is required for “contamination” events during food preparation.
  - Replace term “soiled” with “contaminated”  
*equipment*
    - Section (E)
  - Amend language to clarify handwashing is not required when a change in tasks does not result in contamination.
    - Section (F)



# Foodservice Glove Issues --

## Committee Charge # 2



### Double Glove Provision

- What is meant by the term “double gloving”?
  - The HHC considered it to mean a loose-fit glove worn over a tight-fit glove
    - Tight-fit glove used to prevent bare hand contact with RTE foods
    - Loose-fit glove used as a utensil to prevent contamination of the glove when changing tasks during food preparation (ex. handling raw animal foods)
- HHC recognized that through use of a combination of gloves, equipment and emerging processes it is possible to donn/doff a secondary glove without contamination of the primary glove.
- If no contamination of the primary glove occurred, then handwashing should not be required.





# Foodservice Glove Issues -- Outcomes

## Committee Charge # 1

### Definition of double-gloving

**Committee consensus: recommend the following procedure / definition be included in the Food Code:**

**The use of a loose-fit FOODSERVICE GLOVE – used over or in addition to a FOODSERVICE GLOVE for the purposes of allowing a FOOD EMPLOYEE to switch tasks without a necessary FOODSERVICE GLOVE change or handwashing. The loose-fit FOODSERVICE GLOVE must be capable of being removed or disposed of without contamination to the primary FOODSERVICE GLOVE, hands or forearms.**



# Committee Recommendations



**1 – Further Studies are needed to see if the use of an alternative handwashing regimen actually leads to meaningful risk reduction.**

List of potential questions that could be addressed through research are included in the Committee report.

**2 – Add definition of foodservice glove to the FDA Code.**

**3 – Add provision and public health rationale for double-glove procedure to the FDA Code.**



# Committee Recommendations



**4 – Amend Section 2-301.14(G) to allow for a handwashing exception during the double gloving procedure.**

**5 – Recommend clarification of the Food Code language of “changing tasks” to (1) wash hands when switching from raw to RTE foods, (2) remove term “soiled equipment” in lieu of “contaminated equipment”**



# Committee Issues



## CFP 2014 Council III

- #009 Report – Hand Hygiene Committee (HHC)
- #010 HHC-3 Recommended Foodservice Glove Language Changes to the Food Code
- #011 Re-create – Hand Hygiene Committee (HHC)



# Committee Members



The 2012-2014 Hand Hygiene Committee final report and issues reflect a well-debated group process and consensus;

The report and issues were finalized and approved by this committee and accurately reflect the considerable time and input contributed by the wide variety of stakeholders who participated.

**Many thanks to the Hand Hygiene Committee members and their respective agencies for the time, energy and dedication devoted to this topic.**



