**Conference for Food Protection**

**2012 Issue Form**

**Internal Number: 101**

**Issue: 2012 III-004**

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| **Council Recommendation:** | Accepted as  Submitted |  | Accepted as Amended |  | No Action |  |
| **Delegate Action:** | Accepted |  | Rejected |  |  |  |

*All information above the line is for conference use only.*

**Title:**

Double glove use or glove changing in relation to handwashing

**Issue you would like the Conference to consider:**

The conditions under which double gloving or glove changing without handwashing would be allowed/acceptable to ensure proper food handling.

Due to current wording and/or interpretations of the 2009 FDA Food Code, the determination has been verbally made that double gloving is allowed even between raw food handling and ready to eat food handling, with handwashing only required when glove in direct contact with hand is removed. (Note: This verbal interpretation was offered by FDA staff members and State of Wisconsin Department of Agriculture, Trade and Consumer Protection (retail establishment regulations) at a HACCP related training opportunity in 2010.)

Confusion regarding proper procedure for double gloving is based on two factors -- the inclusion of single use glove (a type of utensil in the Food Code definitions) and ambiguity in the "When to Wash" procedures in Food Code Section 2-301.14. Currently, 2-301.14 states "before putting on gloves" and "after engaging in other activities that contaminate the hands", but does not specifically state handwashing is required between each new pair of gloves.

There are two established scenarios where a food employee can change gloves without handwashing:

* Working with same type of food product (e.g., ready to eat product, then another ready to eat product) -- For example, making a cold cut sandwich then donning new glove to make a chef salad
* Working with multiple foods, but handling them in an order that will prevent cross contamination based on proper cook temperatures (e.g., moving from ready to eat product to raw product) -- For example, making a lettuce salad with a glove on, then donning new glove to work with raw beef. Handwashing would not be required whether or not an additional glove was used or original glove removed.

However, during inspections at several national franchises in the past several years, the following scenario has been observed:

Step 1: Employee wears glove when making a ready to eat chef salad

Step 2: Employee then uses same glove, or another glove on top of the first glove, to handle raw meat (burger, for example)

Step 3: Employee immediately goes back to handling ready to eat food (assembles burger items-bun, condiments, lettuce, cooked foods, etc) and has done one of the following:

* If only one glove was worn for step 1 and 2, employee removes glove and dons a new glove WITHOUT HANDWASHING
* If glove worn in Step 1, then additional top glove put on for Step 2, employee removes top glove only. Bottom original glove remains on and employee continues ready to eat food handling WITHOUT HANDWASHING

Many believe that at Step 3, all glove(s) are to be removed and hands are to be washed prior to resuming ready to eat food handling. Without specific Food Code clarification, unfortunately, the issue is susceptible to misinterpretation.

It has been explained that the additional glove is a utensil, that if you put on and take off the glove "properly" there's no risk, etc. In these situations, in Wisconsin, establishments are told to seek a variance for this type of procedure.

Is there a risk from improper glove changing and lack of handwashing in the situations noted above? Are we assuming too much if we believe that gloves are impermeable without the potential for "leak contamination"? Are we also allowing a risk during removal and redonning of gloves if handwashing is not done after possible contamination (dirty surfaces, raw food handling, etc.) According to the attached article from Food Safety Magazine, the frequency at which gloves are breached during in-use procedures was 56% of vinyl and 19% of NRL leaked post-procedure (see highlighted areas in attached article).

**Public Health Significance:**

Improper glove use and improper handwashing contribute to contamination of food. Because of this, cross contamination from hands from primarily fecal-oral pathogens and cross contamination from foodborne pathogens (including those with low infective doses such as Enteropathogenic E. Coli, Campylobacter jejuni, Staphylococcus aureus, Shigella, and others based on high risk population susceptibility) remains viable during improper food handling.

**Recommended Solution: The Conference recommends...:**

That the following charges be assigned to a re-created Hand Hygiene Committee:

* Determine if/when double gloving procedures would be acceptable without handwashing. If so, what would those acceptable procedures be?
* What glove criteria or standards would need to be met for a glove to be considered a utensil and not require handwashing?
* The findings of the committee to be used to recommend FDA Food Code language modifications regarding glove procedures and handwashing and that these findings be presented at the 2014 Biennial Meeting.

**Submitter Information:**

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**Attachments:**

* "CFP Issue Attachment - Clean Operations"

It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.