

**Conference for Food Protection
2018 Issue Form**

Issue: 2018 III-025

Council Recommendation: Accepted as Submitted _____ Accepted as Amended _____ No Action _____

Delegate Action: Accepted _____ Rejected _____

All information above the line is for conference use only.

Issue History:

This issue was submitted for consideration at a previous biennial meeting, see issue: 2016 012; new or additional information has been included or attached.

Title:

Amend Food Code Hand Washing Timing not in Compliance

Issue you would like the Conference to consider:

Handwashing is a proven critical step in stopping the spread of harmful bacteria in the foodservice and hospitality industries. Hand hygiene needs to be executed properly to give the best possible chance of bacterial removal and timing plays an important role allowing for proper scrubbing procedure to aid in bacterial removal. However, hand hygiene timing and compliance are seldom done correctly in today's facilities as proper tools have not been utilized often enough nor are they widely adopted.

A food service study has been recently performed at Purdue University's Avery Food Lab (see attached The Effect of a Water Flow Timer on Foodservice Food Handlers' Handwashing Behavior) and has proven that standard hand washing training alone does not increase hand washing timing compliance in the foodservice industry. Proper hand washing timer tools and hand washing posters, available in the industry, provide the best possible chance at performing the act correctly and have been found to alter food service professional's behavior at hand washing stations. When a hand washing timer is added to a food service sink with indirect training, hand washing timing compliance increases dramatically. Furthermore when a hand washing timer and a proper hand washing poster, which are already required per 2013 FDA Food code (6-301.14 Handwashing Signage), are used together with indirect training, is when we see hand washing timing compliance at its highest success rate. If a hand washing timer and a proper hand washing poster are coupled with an active/direct training for providing the rationale, the effect of the passive/indirect intervention and its constant reinforcement may become even stronger. Once both the hand washing timer and poster have been removed from the hand washing sink is when we see users decrease hand washing timing to its lowest percentages of proper use.

Based on the multiple tests conducted by the Center for Disease Control (see attached Journal for Food Protection (JFP)- Factors Related to Food Worker Hand Hygiene Practices PDF) and sanitation departments around the nation, it is necessary for a person

to wash their hands for a minimum of 15 - 20 seconds directly under water and with approved soaps to kill 99.9% of disease causing bacteria to reach a true clean (see attached Hand Washing Facts - Joe Hardy PDF). Based on a Michigan State University (see attached Michigan State University Hand Hygiene Compliance Study PDF) study of over 4,000 participants, only 5% of individuals are washing their hands correctly per the regulations where 15 to 20 seconds is required for a total germ free clean.

As stated by the Center for Disease Control and local health departments nationwide, there is no direct and efficient substitute for hand sanitation than a simple correctly executed hand wash with soap and water. Poor hand hygiene accounts for up to 60%, which is the majority, of food borne illness as outlined by the World Health Organization (see attached World Health Organization Hand Hygiene and Food Borne Illness PDF). This statistic is only of reported food borne illness cases where only a small fraction of all occurrences are actually reported to health authorities leaving this epidemic in reality to be exponentially higher. Poor hand washing also directly accounts for over 20,000 deaths annually in medical establishments in regards to contraction of Hospital Acquired Infections, the 4th leading cause of death in the United States today.

Public Health Significance:

The Center for Disease Control has researched, studied, and dictated the proper methodology of hand hygiene is washing your hands for a minimum of 20 seconds to avoid the spread of harmful bacteria from a person's hands. This data related to the length of time for each hand hygiene episode can be verified in a research study (see attached Quantifying the Effects of Water Temperature, Soap Volume, Lather Time, and Antimicrobial Soap as Variables in the Removal of Escherichia coli ATCC 11229 from Hands - PDF). This study stated that statistically significant improvements were found for a lather time ($P \leq 0.01$) of 20 seconds versus that of 5 seconds, 10 seconds, or 40 seconds respectively using approved hand soaps.

So many cases of food borne illnesses and hospital acquired infections are directly traced back to poor hand hygiene practices being conducted by food service and medical professionals. Staphylococcus aureus is common on people's hair, nose, and skin and because shaking hands, fixing your hair, and wiping your nose are all ways of spreading this bacteria; washing your hands for 20 seconds is the most effective preventive measure to safeguard yourself and others from illnesses. It is the first sign of defense always outlined by health authorities to protect oneself from illness.

Food service employees that do not wash their hands for a minimum of 20 seconds are more prone to causing customer illness. As more and more people are going out to eat and the exponential growth of the hospitality industry, without proper hand washing timing tools, many food service employees can pass harmful bacteria onto others by simply having poor hand hygiene practices. Clostridium difficile is also becoming a huge epidemic in food service as well as medical facilities as it is extremely common among the general public and passed via touch and normal contact. Because it is a spore, it is resistant to hand sanitizers and thus the only way to properly kill and remove this bacteria is by washing one's hands correctly with soap and water to remove the spore bacterium.

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA requesting all retail food establishments be required to have a hand washing timer on all hand washing sinks in their establishment(s) and that language be amended to the most current edition of the FDA Food Code as follow:

1. adding a Paragraph E to Section 5-202.12 (Hand washing Sink, Installation) stating the requirement of a hand washing timer on all hand washing sinks in all retail food establishments
1. adding a Paragraph D to Section 5-205.11 (Using a Hand washing Sink) stating the requirement of a hand washing timer on all hand washing sinks in all retail food establishments.

Submitter Information 1:

Name: Zachary Eddy
Organization: Sanitimer
Address: 318 Hopewell Drive
City/State/Zip: McKinney, TX 75071
Telephone: 817-480-6484
E-mail: zeddy@sanitimer.com

Submitter Information 2:

Name: Charles Abraham
Organization: Sanitimer
Address: 3913 Summerhill Lane
City/State/Zip: Fort Worth, TX 76244
Telephone: 817-933-5399
E-mail: cabraham@sanitimer.com

Supporting Attachments:

- "The Effect of a Water Flow Timer on Foodservice Food Handlers' Handwashing"
- "Quantifying the Effects of Removal of Escherichia coli ATCC 11229 from Hand"
- "Michigan State University Hand Hygiene Compliance Study"
- "CDC Food Safety Study Hand Hygiene"
- "Hand Washing Facts – Joe Hardy"
- "WHO Hand hygiene and Food Borne Illness"

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.