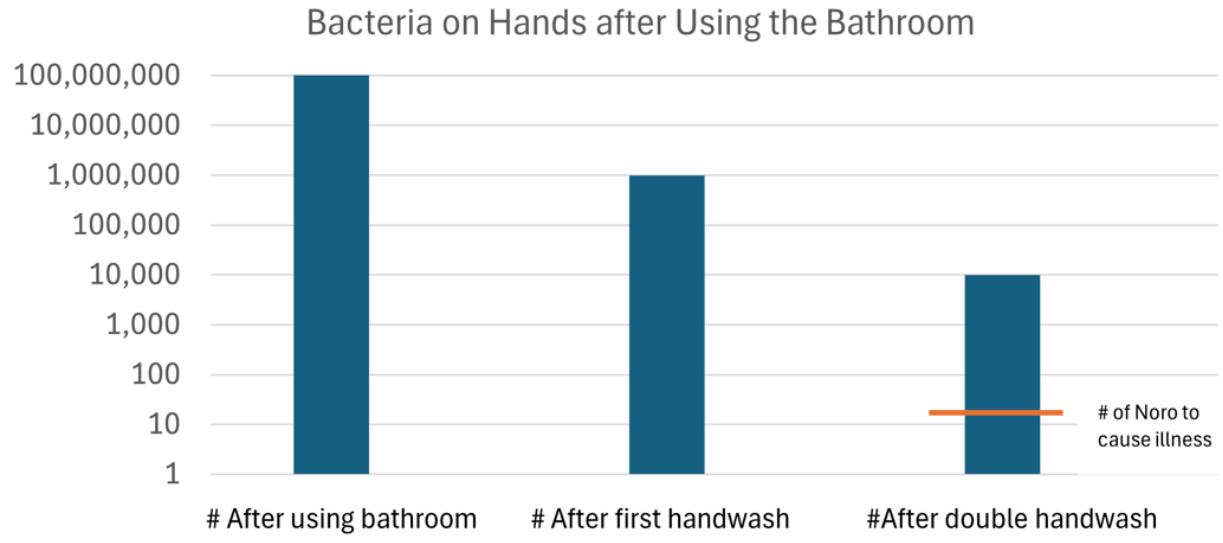
Proposed Food Sanitation Rule Adoption
Frequently Asked Questions
12/22/25

1. **How can I tell what food service rules might be changing?**
   We know new rules can be confusing, and we want to make them easy for food workers to understand. You can review both the proposed rule document and the list of Significant Changes to see which updates are most likely to apply to your establishment. We have highlighted the sections of the rule in blue that are new, so they are easy to find as well.

2. **Is OHA proposing a "glove rule"?**
   Absolutely not! As you may know, glove use in food establishments can present challenges for both food safety and environmental stewardship. What will be required is that food workers use tools like spoons, spatulas, tongs, deli papers, etc. to handle ready-to-eat foods. Non-latex gloves may still be used, but they are not the only option.

3. **Why can't food workers just continue to double handwash and use bare hands?**
   Unfortunately, even the best double handwash is no match for norovirus, which is the No. 1 cause of foodborne illness in Oregon and the United States.
   To give you an idea of why we need good handwashing AND not to touch food that will not be cooked, this graph shows how few norovirus particles are required to make you sick:



4. **Why is Oregon considering adopting the bare-hand-contact ban now?**
   This requirement has been part of the national FDA Food Code since 1997 and has already been required in Oregon Department of Agriculture-regulated facilities since 2013.

   Most of the U.S., including our neighboring states, already have this rule in place. The science is clear that double handwashing alone is not enough to stop the spread of norovirus and other foodborne illnesses.

   By adding this rule, Oregon will be aligning itself with national standards and taking an important step toward reducing foodborne illness and protecting public health.

5. **What if I absolutely need to touch ready-to-eat food in my restaurant?**
   The proposed rules will still allow for the option to apply for a variance if the owner/operator can show that the establishment has additional public health practices in place. You can read more about this process in section 3-301.11(E) of the proposed rules.

6. **When will the person in charge at my food service establishment need to have their food manager training certification?**
   Operators will have until 2029 to meet this requirement. OHA and the rule advisory committee wanted to provide plenty of time for establishments to come into compliance.

   There will be a three-step implementation process with the following target dates:
   - **Step 1- Effective January 1, 2029:** At least one person in charge shall be a certified food protection manager who demonstrates proficiency in required food safety knowledge by passing a test that is part of an accredited program.
   - **Step 2- Effective January 1, 2031:** At least one person in charge working each day shall be a certified food protection manager who has demonstrated proficiency in the required food safety knowledge by passing a test that is part of an accredited program. The certified person in charge must be present during the hours of operation that represents the highest food safety risk to the food establishment. This step is different from what is in the 2022 FDA Food Code and was created based on discussion by the rule advisory committee.

7. **How much will it cost for managers to get the certification?**
   Costs will vary depending on the program. Restaurant owners may offer to pay for the course for their employees or it may be a condition of employment for new hires in the future.

   There are several accredited courses with a wide range of costs. You can find a list of approved classes here.

8. **I heard there is a new option being proposed for cooling. What does that mean?**
   OHA is proposing to add language that allows food establishments to cool foods uncovered in shallow layers of 2 inches or less as an additional option for compliance with the cooling requirement in rule.

   You may still use the standard method (from 135ºF to 70ºF within two hours, and then to 41ºF within four hours). However, this new shallow-layer option provides operators more flexibility and can reduce the need to take frequent temperatures during the cooling process.

   Because the food is spread out in thin layers, heat escapes more quickly, helping foods cool safely and evenly while minimizing the time that food handlers have to spend handling and monitoring foods that are cooling.