

CCC SOP Questions Not Answered During Class, November 2023

1. When the water bottles are outside (and stored together in a bin), how do they need to be retrieved? - Does the adult get and provide them to the children, or can the child get it themselves?

Answer: Child care sanitation rules do not regulate who retrieves the water bottles. When the bottles are taken outside, they are considered in use and not in storage. During an inspection if you see potential contamination occurring then this should be noted during your inspection. However, requiring the teacher to retrieve the water bottle instead of the child is outside of our regulatory control.

2. How is it determined which bulk foods that must be stored in a food prep area or kitchen vs. bulk foods that can be stored in areas without food prep areas?

Answer: Potentially hazardous bulk food must be stored in a food prep area or kitchen in a full size refrigerator. Bulk dry goods and food stored in freezers are not required to be stored in a room with a food prep area as long as the preparation of those bulk dry goods or freezer items is done in the kitchen or a food prep area. Normally, if bulk food items do not require preparation, then they will need to be stored in areas containing a food prep area or the kitchen. The premise is that for bulk items including refrigerated items that can be immediately served without preparation such as milk, these items should be stored in areas where the ability to wash hands is immediate; ie; the kitchen or an approved food prep area.

We realize there are exceptions to this premise but use this guidance as a rule of thumb. Originally, there was an assumption that foods requiring refrigeration, would be stored in the kitchen. However, we have seen a growing trend over the years that refrigerated units are being located out of the kitchen and throughout centers and schools without a direct means to wash hands. Centers are expanding; however, their kitchen space and storage are not. This new rule language attempts to minimize that. Continue to regulate bulk storage in the "classroom" as before which requires a food preparation area if items are not individually packaged. Lunches from home are not categorized as individually packaged. Bulk food items such as goldfish, crackers, chips, etc are not considered bulk dry goods for purposes of this rule and will require a food preparation area if stored in the classroom.

3. Why do centers have to store water bottles individually now when they didn't have to in the past?

Answer: No rule provision in the past allowed water bottles to be refilled without washing, rinsing, and sanitizing between uses. Centers that were previously doing these procedures were doing so incorrectly. The new rule allows water bottles brought from home and used for water consumption only to be refilled; cleaning and sanitizing between uses is not required. The new rule does require water bottles sent from home and used for water consumption only to be stored in the cubbies or an approved means of separate individual storage. For centers that choose not to comply with this provision, they have the option to provide multiple water bottles from home or use disposable cups, or wash rinse and sanitize in the child care kitchen between each use.

4. Theresa's thawing of human milk question? Already answered on FAQ from 6/27:

Answer: If human milk is to be thawed and then held cold, it may be thawed under refrigeration at a temperature not to exceed 45 degrees Fahrenheit or under running potable water of 70 degrees Fahrenheit or below in accordance with .2807(i). Once thawed, the human milk can

then be put in a bottle warmer if needed. Note: human milk expressed from home can be held at room temperature for 2 hours. Expressed at the center for 4 hours. This does not apply to frozen human milk brought to the center.

5. If a Pre-K is in a school and depends 100% on the school's kitchen for food, then can the teachers provide food in the class? Does ALL of the food have to come from the kitchen?

Answer: Individually packaged food may be stored and served in the classroom. Food and sources must be compliant with .2804(a). Bulk food storage and preparation must be in the kitchen or an approved food preparation area. Any multi-use articles that are utilized in the classroom for snack preparation must be sent back to the lunchroom to be washed, rinsed, sanitized and air-dried. These items may not be washed in the pre-K classroom.

6. How can we determine/verify if a domestic dishwasher is sanitizing properly?

Answer: 15A NCAC 18A .2812 CLEANING, SANITIZING, AND DISINFECTING EQUIPMENT, UTENSILS, AND OTHER AREAS (c) When utensils and equipment are washed mechanically using a dishwasher, food-contact surfaces of equipment and utensils shall be sanitized according to the dishwasher manufacturer's instructions. When a domestic dishwashing machine with a sanitizing cycle is used according to manufacturer's instructions, additional sanitizing is not required. When commercial dishwashing equipment is used, the dishwasher shall be equipped with a temperature indicating device that is accurate to two degrees Fahrenheit. Domestic dishwashers must have a sanitizing cycle and be used in accordance with manufacturer's instructions. Moreover, domestic equipment is allowed by statute. Domestic dish machines do not meet the same standards as commercial machines. The manufacturer's instructions must be followed, and the machine must be operable and in good repair. It will not always be possible to test a domestic machine's sanitizing cycle.

7. For the purpose of storing kids' lunches sent from home, they put a full-sized domestic fridge in the cafeteria. Can't go in the kitchen since domestic, but can it be in the cafeteria/seating area and still be considered in the "kitchen/approved food prep area" for our purposes?

Answer: NO.

How (Thinking of options if cafeteria won't allow or does not have room to store in the cold-holding equip)

Answer: Storing the refrigerator outside of the kitchen area and into the seating areas would not be considered the kitchen or food prep area for the purpose of this requirement. All licensed child care centers are required to have a minimum kitchen. For child care centers located in a school, the cafeteria's kitchen meets their minimum kitchen requirement. If the Pre-K program cannot utilize the kitchen area to be utilized for these purposes, then the school system may have to create a minimum kitchen to meet the rule requirements. Pre-K programs are allowed to have food prep areas in the classroom. Other areas in the school such as teacher's lounge with an approved food prep area could also be utilized, providing access and food security is controlled by licensed child care staff. A Standard Operation Procedure has been created that would allow Pre-K lunches to be stored in the 2600 permitted kitchen.

8. Is the SOP Kimly referenced regarding storage of students' lunches in school cold-holding equipment available in writing? If so, where can it be found?

Answer: We reached out to DPI last week for final review. They have asked that we give them an additional week to finalize. Once final revisions are made by DPI, the SOP will be made available via list serve and posted on CEH's website.

9. Since DCDEE gives 45 days to correct lead water testing violation, if we give a provisional for that violation, should we give 45 days before doing a re-inspection? Or still 7 days?

Answer: Our provisional classification timeframe is independent of DCDEE's requirements. The timeframe of the provisional period per our child care sanitation rules, depends on the water testing violation. For example, If it is for non-compliance for testing then the 7 day period is appropriate. For constructional issues, a longer provisional period is warranted. A 30 day period is common for construction issues. Indicate on the paperwork during your inspection the amount of time you are designating for the provisional period.

10. If shelf stable milk that is stored in the kitchen is sent to the classroom and is served from for breakfast, can the remaining opened or unopened milk be kept in the classroom to be served from at lunch? **Answer:** The remaining opened milk should be sent back to the kitchen for storage. Unopened containers of milk should also be stored in the kitchen if the classroom is not equipped with a food preparation area. This item is not considered individually packaged.

11. What about bottle warmers that can warm food and bottles? Are they prohibited?

Answer: Bottle warmers that warm bottles and food are allowed if used according to manufactures' instructions.

12. Standing diapering need a barrier under child?

Answer: The current child care sanitation rules do not reference a standing diapering procedure. It is recommended that a barrier be used under the child during the standing procedure but is not a demerited item unless contamination of the floor surface is noted and not properly cleaned and disinfected. The new rules do require a non-absorbent barrier if the diapering procedure is performed on the floor in the toilet room. This applies to children lying on the floor as they do on a changing table.

13. A child care center in a church...the children are right by the kitchen, however the kitchen is not part of the licensed area of the CCC. Does the kitchen door have to be locked?

Answer: Hot water in the kitchen will need to be made inaccessible. Chemicals stored in the kitchen will need to be stored locked or inaccessible in accordance with rule .2820.

14. If gallon of milk is brought to classroom and placed on the table, is that considered served?

Answer: If the milk is taken out of its original container and placed on the table for family style type service, then the milk is considered served. However, if the gallon container of milk is placed on the table, unused portions of the milk container is not considered served. It is recommended that teachers distribute the milk while in the classroom to decrease the potential of contamination. It is also recommended that the amount of time the milk is out of refrigeration be minimal or kept on an ice bath during this period of service. Most centers do not store gallons of milk on the table during feeding as best practice.

15. The slide said that even if childcare facility had multiple sinks in a room, they could NOT designate a one of them as a drinking water sink. But they could install a new sink and designate that one for drinking water. I am not understanding the difference as long as there are enough sinks to satisfy requirements, then why can't they just designate an existing one instead of installing a new one?

Answer: The slide in the sink presentation is referencing an additional sink can be added in the food preparation area in addition to the hand wash lavatory to be used for mixing of formula, etc. If an additional sink is already located within that food preparation area, then that sink can be designated as a food preparation sink. However, just designating a handwash lavatory within the classroom as a sink used for water consumption would not be permitted.

16. Clarification of “markable” sink violations:

- Separate handwash lavatory not provided in food prep areas: **# 8- 6-point demerit item**
- Proper change of use procedures not performed on any sink where required: **#21- 4 point demerit item**
- Utensils, cups, spoons, bottles etc. rinsed or washed in food prep hand wash (lavatory) **#10 – 5 demerits?**
- Diapering sink not provided **#24 - 6 demerits**
- Diapering procedure as described in .2819 not followed including washing hands in the diaper changing sink within the diapering area **#27 -4 demerits and/or #1 – 5 demerits**
- Performing food preparation without washing hands in the food preparation area **#1 – 5 demerits**
- Using the food preparation handwash sink to wash hands outside of food preparation: Not recommended to be demerited. Note this as an educational comment on comment addendum.