

North Carolina Department of
Environment And Natural Resources

Division of Environmental Health

Michael F. Easley, Governor
William G. Ross, Jr., Secretary
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July 16, 2002

TO: Richard Wagoner, RS, Environmental Health Supervisor
Wake County Department of Environmental Services

FROM: Larry D. Michael, RS, MPH, Environmental Specialist
Children's Environmental Health Branch

THROUGH: Ed Norman, MPH, Program Supervisor
Children's Environmental Health Branch

SUBJECT: Marking Handwashing Violations Associated with Diaper Changing

This memo is to provide clarification concerning the correct place to mark handwashing violations that occur during the diapering process. As you have stated in your correspondence, it does appear that handwashing violations associated with diaper changing activities could be marked in two places, items number 26 or 45, on the *Sanitation Standards Evaluation Form for Child Care Centers*.

If a handwashing violation occurs during the diapering process, the appropriate place to mark demerits is item number 45 on the evaluation form. Both rules, 15A NCAC 18A .2819(i) and (j), make reference to 15A NCAC 18A .2828, which is the rule that deals specifically with handwashing and is referenced as item number 45 on the evaluation form. Furthermore, this interpretation is consistent with marking violations that occur when employees preparing or serving food fail to wash their hands in accordance with the rules. Handwashing violations in 15A NCAC 18A .2808(c) must be marked on item number 45. Consistency is improved if all handwashing violations are marked in the same location.

Currently, 15A NCAC 18A .2819(i) and (j) are not referenced on item number 45; however, the violations can also be found in 15A NCAC 18A .2828(a) and (b), which are indicated on item number 45. This issue will be addressed when the child care sanitation rules are revised in the future.

Thank you for your questions concerning this issue. Please contact me at (919) 718-0837 or Larry.Michael@ncmail.net if you have any further questions regarding this matter.

cc: Environmental Health Listserv

Rick Wagoner wrote:

Where is the correct place to mark handwash violations associated with diaper changing. Assuming there are no other types of handwashing violations, would you mark line 26 on the gradesheet (Approved diapering methods) or line 45 (Proper handwashing)? Rule .2819(i) (DIAPER CHANGING FACILITIES -Line 26) states that employees should wash their hands after each individual diaper change in accordance with rule .2828. Rule .2828 (HANDWASHING - Line 45) refers to proper handwashing after diaper changing. It seems that you could technically mark this violation in both places but we don't want to "double dip". I realize there are certain situations that could qualify as separate violations in both categories. My question deals specifically with handwashing problems that occur during the diapering process.

P.S. The rules requiring handwashing for children after diapering are also located in two places (.2819 & .2828).