

## **Child Care Sanitation Rules Operator Training FAQ 9/20/2023**

1. Will this presentation also be recorded and shared?  
Answer: Today's training was not recorded. However, all the training materials including the slide presentations can be found at the following training site. Future trainings may be recorded. <https://ehs.dph.ncdhhs.gov/hhccehb/cehu/ccs/op-training.htm>
2. Can Pre-k students bring water bottles to school?  
Answer: That determination will need to be made by the individual program, however, if they are allowed to bring water bottles to school, rule .2804(i) would apply requiring the water bottle to be labeled with the child's name, individually stored in the child's cubby and sent home at the end of each day.
3. Is there an email for these contacts? Or Phone number? Or do we just mail all info to them? (in reference to plans)  
Answer: First, contact your local environmental health section of the health department and they can assist you with where the plans should be submitted.
4. Please let us know how to get official answers to unanswered questions. I don't feel comfortable relying on my inspector's interpretation, knowing that that the next inspector may not interpret the rule in the same manner.  
Answer: Answers will be posted on the same website that is being posted in the chat. <https://ehs.dph.ncdhhs.gov/hhccehb/cehu/ccs/op-training.htm>
5. Will slides be made available to us? This will be helpful for training purposes as I'm the only one able to attend today.  
Answer: Yes. <https://ehs.dph.ncdhhs.gov/hhccehb/cehu/ccs/op-training.htm>
6. If a staff person is also parent of an infant child and pumps during childcare hours, labels and puts the human milk in the classroom refrigerator, has the storage of human milk that was just pumped rule changed?  
Answer: No, the rule has not changed; human milk will still be required to be discarded or sent home at the end of each day.
7. Can individual water bottles be stored together in a large bin?  
Answer: No. Water bottles should be individually stored in the child's cubby. If there are no cubbies in the classroom, the water bottles should be stored individually in a manner that prevents cross-contamination.
8. Does this apply to a sippy cup that is used for water only?  
Answer: No.
9. Does this rule apply to school age care in before and after schools?  
Answer: Assuming this question is in reference to water bottles, yes the same rules apply.
10. Can we have a cart for the water bottles or do they have to be in cubbies?  
Answer: No. Water bottles should be individually stored in the child's cubby. If there are no cubbies in the classroom, the water bottles should be stored individually in a manner that prevents cross-contamination.

11. How do we take water bottles outside for the playground?

Answer: When water bottles are transported outside, and being used while outside, the water bottles are considered to be IN USE during these times, and not being stored. Therefore, they may be kept in a way that prevents contamination and transported in a caddy.

12. If we provide water in a container, for each child, do they still need to be stored in cubbies or can we put inside the refrigerator?

Answer: Question unclear.

13. If centers are washing the water bottles at end of every day, can they stay at school?

Answer: No. Under this new provision for water bottles, water bottles must be sent home at the end of each day.

14. Can water bottles be stored on shelves in food prep area?

Answer: Water bottles should be individually stored in the child's cubby. If there are no cubbies in the classroom, the water bottles should be stored individually in a manner that prevents cross-contamination. Storage on shelves should be so that bottles are individually stored, do not come in contact with other water bottles.

15. What about drinking cups for 1's?

Answer: Question unclear.

16. What about parents who send snacks, not hot food, in a lunch insulated container?

Answer: Lunches, snacks, and other meals containing potentially hazardous foods shall be refrigerated at 45 degrees Fahrenheit or below and stored in the child care center kitchen or approved food preparation area. Hot foods that a child brings from home to the child care center in double-walled, insulated thermos containers may be stored outside of refrigeration at the child care center with the written permission of the child's parent or guardian.

17. What if the classes have refrigerators in their classroom?

Answer: Question unclear.

18. What if the parents provide an ice pack in cold food lunches?

Answer: Lunches, snacks, and other meals containing potentially hazardous foods shall be refrigerated at 45 degrees Fahrenheit or below and stored in the child care center kitchen or approved food preparation area. Stored with ice packs is not considered refrigerated. This is not a new requirement.

19. The water bottles are all touching each other in the caddy, would it be better if the children handled their own water bottles and placed them on a table or water bottle area outside?

Answer: The center may allow children to transport their water bottles outside.

20. Can a family choose to send in a food that they want to be served at ROOM temp, as long as it is not a potentially hazardous food?

Answer: Yes.

21. Why can elementary schools store their lunches that need refrigeration stored in the classroom?

Answer: 2800 Child care sanitation rules regulate licensed child care centers (including Pre-K) but do not regulate the non-licensed child care portions of elementary schools.

22. Do water bottles need to go home every day at the end of day?

Answer: Yes.

23. Is the plastic of the shoe holder for water bottles allowed. Or is it similar to having plastic in reach of children (like wipe containers)?

Answer: Consult with DCDEE to determine if this type of set up is allowed and not prohibited.

24. Since COVID restrictions were lifted are water fountains allowed to be used?

Answer: Contact your DCDEE consultant.

25. How close to the food prep area (PreK classroom that does not do food prep but does have a specified sink) must the refrigerator be? Can it be on the counter next to the sink?

Answer: Sanitation rules do not specify measurement of distance. However, if the refrigerator is going to be specified as being in a food preparation area then the sink will need to be in the area and in close vicinity to the refrigerator. That sink will need to be separate from other handwash sinks and designated as the food prep handwash lavatory. Recommend contacting your local Environmental Health Specialist for food preparation area consultation.

26. What about an ice pack in cold lunch boxes?

Answer: Lunches, snacks, and other meals containing potentially hazardous foods shall be refrigerated at 45 degrees Fahrenheit or below and stored in the child care center kitchen or approved food preparation area. Stored with ice packs is not considered refrigerated. This is not a new requirement.

27. Can water bottles be stored in the child's bookbag on the side for before/after school childcare?

Answer: Yes, water bottles may be stored individually in a manner that prevents contamination.

28. What constitutes an approved Food Prep area for our public school preschool classrooms? How do we handle the issue of having only one sink in the classroom? Can we still disinfect the sink prior to food prep to count as a food prep area?

Answer: An approved food preparation area shall contain a countertop that is kept clean and in good repair, a handwash lavatory, and refrigeration when items are stored that require refrigeration in accordance with Rules .2804 and .2806 of this Section. If only one handwash sink is in the classroom and used to meet handwashing requirements for the children, then this sink cannot be designated as your food prep hand wash sink. A separate lavatory for handwashing is required in a food preparation area. Previous rules or current rules do not allow a regular handwash lavatory to be disinfected and then used to meet the requirement of a food prep handwash sink.

29. Frozen human milk in freezer for 3 months...is this the pump date or the date brought to center?

Answer: Date brought to the center.

30. Many years ago we were told that we weren't allowed to dump infant bottles after completion of feeding, had to send home with nasty old milk. A recent sanitation presentation said we could dump or not dump. Also that we need written permission to send home. Super confused. Currently appears that we should dump leftover milk, unless the parent provides written permission to save it. Can you clarify that this is correct?

Answer: Prior to the rule changes, unused milk was allowed to be discarded or sent home. The new rule clarifies that nothing in these Rules shall prohibit human milk from being sent home at the end of the day instead of being discarded when the child's parent or guardian has given the child care center written permission to send the human milk home. The center should verify with the parent or guardian how they want their leftover milk handled.

31. Please clarify the required thermometer type. During a previous presentation, a specific type was required for hazardous foods, but seemed to be in reference to raw meats. If all of our meats/eggs are precooked, can we continue using the digital stem thermometer previously allowed?  
**Answer: No. A thin-probe thermometer is required for confirming food temperatures (cold or hot) for all potentially hazardous foods, regardless if raw, cooked or pre-cooked.**
32. I think you just clarified this, but we can bring a bowl of goldfish from the kitchen and scoop it onto the plate in the classroom as "food service"? Our sanitation inspector told us it needed to be scooped in the kitchen and not the classroom.  
**Answer: You are correct, this example is considered food service as long as the bulk goldfish is stored in the food prep area or kitchen.**
33. Does hair "restraint" require a net or is pulled into a ponytail acceptable?  
**Answer: A ponytail is not an acceptable hair restraint.**
34. Is a visor approved hair restraint.  
**Answer: Yes, if it is designed and worn to effectively keep their hair from contacting exposed food, clean equipment, utensils and linens, and unwrapped single service and single use articles.**
35. Are gloves required while feeding infants with a spoon? What about when feeding a bottle?  
**Answer: No.**
36. What about prepackaged foods like muffins? Should we wear gloves to prevent accidental touching? What about fruit like apples?  
**Answer: Bare hand contact is prohibited with ready-to-eat foods.**
37. Do we wear gloves when feeding bottles?  
**Answer: Not required per sanitation rules.**
38. Is the no bare hands rule applicable to food service as well as food preparation?  
**Answer: Bare hand contact is prohibited with ready-to-eat food during food preparation or food service.**
39. If a parent sends a turkey sandwich with apple, no condiments, and a cold pack, would the lunch need to be refrigerated?  
**Answer: Yes, lunch contains potentially hazardous food.**
40. So, cupcakes are not allowed temporarily to be stored in the classroom?  
**Answer: Question unclear.**
41. Are classrooms allowed to do group food activities in the classroom? Such as cutting fruit to make a fruit salad or harvesting ingredients from the garden then making pesto.  
**Answer: There are many potential scenarios that are involved in this question. Contact your local Environmental Health Specialist for assistance.**
42. What if we don't have an "approved food prep area"?  
**Answer: Question unclear.**
43. Does bulk food include items such as bulk containers of goldfish for snack?  
**Answer: Yes.**
44. We provide specialty milk which arrives by the case, similarly, packaged as the containers shown on this slide. Is there a way they should be labeled to prevent confusion by the inspector?  
**Answer: No. Inform the inspector that you provide specialty milk, however documentation may be required.**

45. Are we allowed to serve this many types of specialty milk? (Referencing the picture of examples)

Answer: Sanitation rules do not designate the allowance of milk types, however provisions are in place for specialty milks that are sent from home or provided by the center. All milk must come from an approved source.

46. Does it have to be dated in labeled containers?

Answer: Question unclear.

47. Do Ziplocks count as a container?

Answer: Once pre-packaged food has been opened, the food shall be stored in clean, resealable bags or containers made of plastic or glass that are tightly covered and manufactured for the purpose of food storage.

48. Does it have to be a container, can it be a gallon size bag and labeled?

Answer: Yes. Once pre-packaged food has been opened, the food shall be stored in clean, resealable bags or containers made of plastic or glass that are tightly covered and manufactured for the purpose of food storage.

49. Can we get this picture? (the food storage order)

Answer: Available in presentation <https://ehs.dph.ncdhhs.gov/hhccehb/cehu/ccs/op-training.htm>

50. Do you have to have a doctor's note for specialty milk?

Answer: Not per .2800 sanitation rules.

51. Fully cooked frozen meat (such as chicken nuggets) are considered "ready to eat" right?

Answer: If the food requires no further cooking, then bare hand contact is prohibited.

52. Please cover whether the infant room is considered to have a "food prep area" subject to food prep rules - or if they are considered a second kitchen subject to kitchen rules. This greatly affects operations so clarity now would be helpful.

Answer: Food prep areas are subject to food prep rules and are not considered a second kitchen. An infant room food prep area is intended for the storage and preparation of bottles, infant cereal etc. The food prep area handwash sink in this food prep area is for handwashing prior to preparing the infant bottles and food and must be tempered. This food prep area handwash sink may not be used for food preparation or to acquire water for the bottle warmer or to make bottles or cereal (may not be consumed for drinking or cooking).

53. Does the infant toddler room have to have a food prep double sink or what is the requirement as far as sinks?

Answer: Question unclear. There are multiple potential scenarios in this question. Please consult with your local EHS. However, if the center has a classroom with a food prep area with a 2-compartment sink serving the purpose of the required food preparation handwash lavatory, both sink basins are considered a handwash lavatory and neither can be used for rinsing/washing dishes and cannot be used for water for consumption. Dishes are to be sent to the kitchen to be washed/rinsed/sanitized and may not be rinsed/washed in the food prep area handwash lavatory. The kitchen will have the required 120 degrees F hot water for proper dishwashing and that hot water is required to be inaccessible to children. Water for consumption for drinking, filling bottles, making cereal, filling the bottle warmer, etc may be provided from bottled water or a pitcher may be filled in the kitchen's 2 or 3 compartment sink and be taken to the classroom food prep area.

54. My school was cited a violation during our last sanitation visit for not using bottled water to warm infant bottles. Can we have this reversed?  
Answer: To inquire about the appeals process, contact your DCDEE consultant.
55. If we have a separate sink specifically for bottle warming will that work?  
Recommend that you contact your local Env Health Specialist to verify that the separate sink is not needed to meet a requirement of a handwash lavatory for a food preparation area or other handwashing sink requirements.
56. To clarify, my food prep sink in the infant's room, I can no longer use the water from that sink to place in the bottle warmer to warm the bottle.  
Answer: Water from a handwash lavatory shall not be used for bottle warming or to prepare formula, mix dry cereals, or other foods. The lavatory required in a food prep area is for hand washing.
57. If the food prep sink is not used for handwashing, can we use that to put into the bottle warmers?  
Answer: The lavatory required in a food prep area is for hand washing, and not for food preparation. Water from a hand wash lavatory shall not be used for bottle warming.
58. Do we get credit for this training class?  
Answer: We do not provide training hours or certificates for child care operators. Contact your DCDEE consultant on how to obtain credits for this training.
59. Ok so high chair tops, I am confused now. Do we send it to the kitchen to be sanitized or no?  
Answer: Yes.
60. What is considered a food preparation area in a classroom?  
Answer: A food preparation area shall contain a countertop that is kept clean and in good repair, a handwash lavatory, and refrigeration when items are stored that require refrigeration in accordance with Rules .2804 and .2806 of this Section.
61. Can you please indicate which type of lavatory can be used to empty (but not rinse) bottles? Can this be done in handwashing sinks?  
Answer: You may empty bottles (but not rinse) into any handwash lavatory.
62. Our center uses a water bleach mix for cleaning, is that to be made daily as well?  
Answer: Yes.
63. So as long as we have an EPA approved sanitizer and disinfectant solution, we no longer have to receive approval from the HD or any other agency before use as long as we have a method for testing, does not require a final rinse step. We are wanting to use Buckeye solution and we have received pushback about it.  
Answer: Sanitizer and disinfectants approved under the .2800 child sanitation rules including .2801 & .2812 are acceptable.
64. What sheet are you referring to about sanitizing every 24 hrs?  
Answer: Question unclear.
65. Going back to sanitizing solution section it talks about chlorine solution. My center uses bleach and water does this have to be made daily or within 24 hours as well.  
Answer: Chlorine solutions shall be prepared for use within 24 hours.
66. Where can I find the change of use sign? I can't find it with this link.

Answer: Available in presentation <https://ehs.dph.ncdhhs.gov/hhccehb/cehu/ccs/op-training.htm>

67. Can the food prep sink be cleaned and sanitized prior to getting water for the bottle warmer?

Answer: No. Water from a handwash lavatory shall not be used for bottle warming or to prepare formula, mix dry cereals, or other foods.

68. Is this for pullups?

Answer: Question unclear.

69. When you say "changed ON the floor" does this include standing diaper changing?

Answer: No.

70. Are there changing steps/guidelines for changing on the floor or in the bathroom like there is for diapering for infants?

Answer: The diaper changing procedure is the same regardless of where the procedure is performed.

71. Now that we have older children in NCPK in diapers/pull-ups this is now more common place and it would be helpful to have a visual step-by-step guide for teachers please.

Answer: Consult with your Child Care health consultant with the NC Resource Council.

72. Is it still ok to change diapers (that are wet only) without gloves?

Answer: Per .2800 Sanitation rules, vinyl or latex disposable gloves shall be used by child care center employees during the diaper changing process if the employee's hands have cuts, sores, or chapped skin. Other programs may have different requirements.

73. What if the kitchen is in a different building?

Answer: Question unclear.

74. What if the kitchen is a means of entering and exiting the church where we are housed?

Answer: Question not clear. However, if you are referencing chemicals, all chemicals are required to be properly stored either locked or inaccessible depending on the product. Recommend contacting building code and fire marshal's office to see if the entrance and exit is approved.

75. In a school aged all day program, do you have to have mats available if naps are not offered?

Answer: .2800 Sanitation rules do not require mats be available, however, if provided, they must meet the requirements of rule .2821.

76. In a school aged all day program, do you have to have mats available if naps are not offered? ADD ON QUESTION: Can you only have a couple of mats available if a child requests or needs a nap or does every child have to have a mat; again in a school-aged all day program- not a before and after school program.

Answer: .2800 Sanitation rules do not require mats be available, however if provided, they must meet the requirements of .2821.

77. Is this specific clean-up plan required or are we able to make one that makes sense for our individual programs?

Answer: You may develop your own vomit & diarrheal plan or utilize the plan provided on our website. <https://ehs.dph.ncdhhs.gov/hhccehb/cehu/ccs/op-training.htm>

78. Is there an updated communicable disease and exclusion list by chance?

Answer: Refer to 10A NCAC 41A .0200 for updated information or contact the Communicable Disease Section at your local health department.

79. Previously we were told that a list of specific employees trained in clean-up was needed. What is the documentation requirement?

Answer: There is no required documentation for a list of specific employees trained, however we recommend that all employees and staff receive training on how to respond to a vomit or diarrheal event.

80. Where can we get a copy of the clean-up plan?

Answer: Provided on our website. <https://ehs.dph.ncdhhs.gov/hhccehb/cehu/ccs/op-training.htm>

81. At this time, when we create disinfecting or sanitizing solution, there are no warning labels on them concerning ingestion or eye, skin, or inhalation except for the NFPA diamond and identification label. Shouldn't these same solutions (bleach/chlorine/detergent solution) have the same "keep out of reach" warnings like other products?

Answer: Non-aerosol sanitizing solutions, approved disinfectants, detergent solutions shall be labeled as sanitizing, disinfecting, or detergent solutions. Other agencies may have additional requirements.

82. How/do we get credit hours for this training?

Answer: We do not provide training hours or certificates for child care operators. Contact your DCDEE consultant on how to obtain credits for this training.

83. So, what is the proper way to clean high chair feeding trays in the kitchen when using the 2-compartment sink?

Answer: See information below

### Steps for manual ware washing including highchair trays using a 2-compartment sink **15A NCAC 18A. 2812 Cleaning, Sanitizing, Utensils, and other Areas** include:

1. Equipment and/or utensils shall be scraped, flushed with water, or soaked with water to remove food particles. Both sinks shall be cleaned and sanitized before proceeding to step (2) of this Paragraph;
2. Equipment and utensils shall be washed in the first compartment of the sink with a hot detergent solution that is changed once visibly soiled. Use the detergent as directed by manufacturer's label instructions. Use a brush, cloth, or scrubber to loosen soil.
3. Equipment and/or utensils shall be rinsed free of detergent solution with clean water in the second compartment of the sink.
4. Place utensils on drainboard, rack, or table.
5. Drain 2<sup>nd</sup> compartment. Refill 2<sup>nd</sup> compartment with water and the approved sanitizer. Make sanitizing solution as directed per manufacturer's directions. Utensils must be immersed for 2 minutes if using Chlorine or as per the approved sanitizer's directions for contact time.
6. When chemical sanitizing is used, the sanitizer must be mixed at the proper concentration and maintained at the correct temperature for the sanitizer used. Check the sanitizing solution at regular intervals with a test kit, if required per manufacturer's instructions.
7. The clean utensils or equipment must be left wet with Chlorine solution and allowed to air dry or be dried after a minimum contact time of at least 2 minutes.
8. All wash, rinse and sanitize solutions must be maintained clean.



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.