MEMORANDUM
March 20, 2020

TO: Registered Environmental Health Specialists, Supervisors, and Directors

FROM: Larry D. Michael, REHS, MPH
State Environmental Health Director

SUBJECT: Cleaning and Disinfecting Solutions and Procedures to control COVID-19 in Schools, Child Care Centers, and other Community, Non-Healthcare Facilities

In response to continued efforts to control COVID-19 in North Carolina, this memorandum provides information on the use of cleaning and disinfection procedures and products in child care centers and school buildings to help control this disease. Some of these recommendations conflict with current rules and policies; however, Executive Order No. 116, Section 15, provides local health departments with authority (in consultation with the Division of Public Health) to waive restrictions related to the type of product or chemical concentration in disinfectant solutions to control COVID-19. The Executive Order is available at the following link: https://files.nc.gov/governor/documents/files/EO116-SOE-COVID-19.pdf

Public health officials should advise schools, child care centers, and other community, non-healthcare facilities to follow CDC’s “Environmental Cleaning and Disinfection Recommendations” guidance to reduce the transmission of COVID-19. The recommendations can be found at the following link: https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html

In addition to good hand hygiene practices, proper cleaning and disinfection of surfaces is effective in preventing disease transmission. According to the CDC’s interim guidance for administrators of child care programs and K-12 schools, performing routine environmental cleaning is recommended to stop or slow the spread of respiratory infectious diseases, including COVID-19. Environmental cleaning includes cleaning frequently touched surfaces (e.g., doorknobs, light switches, countertops) with cleaning products according to the directions on the label. The CDC also recommends providing disposable wipes so that commonly used surfaces (e.g., keyboards, desks, remote controls) can be wiped down by students and staff before each use.

We realize that wipes currently used and approved for use by students may not be readily available and schools may only have access to wipes with chemical concentrations that are considered a violation of 15A NCAC 18A .2415(b). While Executive Order No. 116 is in effect, such wipes may be used by students without being considered a violation of Rule .2415 if handled in a safe manner and teachers: (1) supervise the use and disposal of wipes in accordance with the directions on the label,
(2) ensure students wash their hands with soap and water for at least 20 seconds immediately after using the wipes, and (3) store wipe containers according to Rule .2415 when not in use.

Rule .2801(7) of the child care sanitation rules defines a disinfecting solution as a solution containing 500-800 parts per million (ppm) chlorine. In addition, products registered with the U.S. Environmental Protection Agency (EPA) as hospital grade germicides or disinfectants or as disinfectants for safe use in schools, child care centers, institutions or restaurants are also approved disinfectants, provided the manufacturer’s Material Safety Data Sheets are kept on file at the center and instructions for proper use are followed. To control COVID-19, Environmental Health Specialists should allow the use of disinfectant solutions (instead of sanitizing solutions) on high-touch surfaces in child care centers, including tables, doorknobs, and toilet room surfaces. While this Executive Order is in effect, Authorized Agents should not assign demerits on inspection sheet item 26 if the operator has increased the concentration of chlorine in disinfecting solutions above 800 ppm. Product storage and other requirements for disinfecting solutions will remain the same. Based on CDC guidance, disinfectant solutions should be mixed to approximately 1,000 ppm (note that a one-minute contact time is acceptable at this concentration). If a disinfecting solution is observed to be above 1,000 ppm during an inspection, the solution should be immediately adjusted to approximately 1,000 ppm and the operator should be advised to maintain the solution at that concentration.

In rooms designated for children who are not toilet-trained, toys and other mouth-contact surfaces should be cleaned and sanitized according to Rule .2822 or disinfectants approved for use on food contact surfaces may be used without assigning demerits.

A list of products that have been pre-approved by the EPA for use during the COVID-19 outbreak can be found at this link: https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2

Please refer to the NCDHHS website (below) for current information on COVID-19.

For questions or additional information, please contact Veronica Bryant, Emergency Response and Outbreak Coordinator, at veronica.bryant@dhhs.nc.gov or by phone at 919-218-6943, or you may contact me at larry.michael@dhhs.nc.gov or 919-707-5855.

References: