

November 2, 2016

POSITION STATEMENT: Kitchen Accessibility in Child Care Centers

PURSUANT TO: *Rules Governing the Sanitation of Child Care Centers, 15A NCAC 18A .2800*

SOURCE: Kimly Blount, Field Supervisor
Children's Environmental Health

QUESTIONS / ISSUES: Are kitchens in child care centers required to be inaccessible to children when not in use?

Does making the kitchen area inaccessible to children impede egress from these facilities during emergencies?

DISCUSSION AND RATIONALE:

Administrative Rule 15A NCAC 18A .2815(e) requires water used for cleaning and sanitizing food utensils and laundry to be provided at a minimum temperature of 120°F (49°C) at the point of use. In addition, water in areas accessible to any child, which is in excess of 120° F (49° C), shall be considered a burn hazard. Therefore, kitchens, when not in use, should be made inaccessible to prevent potential burn hazards.

With regards to egress during fires or other emergencies, guidance was requested from the NC Department of Insurance (DOI) to answer questions and concerns about exiting through kitchens versus measures taken to make kitchens inaccessible. According to NC DOI, emergency egress should not be designated through a child care kitchen. Therefore, making the kitchen area inaccessible should not impede emergency egress and should be achievable and feasible in most cases. For compliance issues, local Registered Environmental Health Specialists should have child care centers contact their local building/fire code inspector or Fire Marshall's Office to determine how to appropriately make kitchens inaccessible.

RESPONSE / INTERPRETATION:

During an inspection, if it is noted that a child care kitchen is readily accessible when not in use and the kitchen water temperature is in excess of 120°F then a 6-point demerit under item #17 on the child care sanitation grade sheet should be assessed.

REFERENCES:

N.C.G.S. 110-91

*Rules Governing the Sanitation of Child Care Centers, 15A NCAC 18A .2800
North Carolina Building Code Section 1014.2(4)*

NOTE: Position statements are policy documents intended to clarify how to interpret or enforce a law or rule. They are not enforceable on their own, but are intended to promote uniform interpretation and enforcement of the underlying law or rule.