

EHS NEW RULES TRAINING 9/19 FAQ

1. Are only human milk bottles allowed to be sent home after feeding?

Answer: All bottles are allowed to be sent home with parents' permission. Once used they are out of our regulation and cannot be put back in communal refrigeration. EHS will need to check for written permission from parents.

2. For bottle mixing by the child care providers, if they have written permission from the parent, they could mix powder formula then?

Answer: Correct

3. So, breast milk issues go under .2804 e #4?

Answer: #4 is specific to TEMPERATURE violations. So that could include human milk cold holding, however it could also be other food storage temperature violations. Other human milk violations (depending on what the violation is) could fall under #5.

4. For bottle mixing by the child care providers, if they have written permission from the parent, they could mix powder formula then?

Answer: Correct

5. How do you mark thermos temperatures if we are not required to test hot food items in a thermos container?

Answer: The thermos violations will not be temperature-related since we are not taking those temps. Thermos specific violations will be marked under #5

6. What if they put cold PHF (not hot as stated in rules) and the cold PHF are therefore not 45F or below, would that remain #5 violation or #4 since cold PHF aren't included in .2804 (k)

Answer: If I understand the question, cold PHF must be stored in refrigeration. Only hot PHF may be stored in the approved thermos containers outside of refrigeration. If the cold PHF does not meet the temperature holding requirements it will be marked under #4.

7. So, if the exterior of the thermos feels cold instead of hot / warm when we pick it up, we can open it to see if it is holding hot food or cold?

Answer: As an inspector, you will have the authority to verify if you suspect that the thermos is holding cold foods instead of hot. I would ask the operator to assist in that determination.

8. The way I understand it - basically if they have a note/written permission from the parent then we can't really say or open it. But if they have NO note then we can hold them to meet hot/cold requirements?

Answer: If the food is hot food brought from home in a double -walled insulated thermos and written permission is submitted by the parent, then we will not be opening the thermos to take a temperature. However, thermoses may have to be opened if inspector cannot determine if the food item is deemed cold or hot.

9. Can we discuss a little about TPHC and food deliveries? For example, a childcare center receiving food pre-plated from a permitted school lunchroom (placed in Cambro for delivery).

Answer: The current sanitation rules do not incorporate TPHC. Current regulations require temperature control. We are currently exploring options within regulation and possibly addressing this issue by policy.

10. So, portioning something like goldfish from a bulk bag onto plates for the kids in the classroom would be service and not prep, is that correct?

Answer: Correct

11. Can the unused portion of that bulk bag go back to the kitchen &/or into other classrooms to be served to kids in other classrooms?

Answer: Yes

12. If portioning bulk goldfish is food service, why does it need a food preparation area? Asking for every operator.

Answer: STORING the bulk goldfish in the classroom requires a food prep area, SERVING the bulk item does NOT require a food prep area.

13. 2808 f. Is this restriction for an outbreak at that center or a general outbreak in the area with other centers?

Answer: At that particular center

14. If making their own sanitizing solution with bleach, do they need a SDS for bleach?

Answer: Yes

15. Is there a testing method for Chloroglass?

Answer: Yes. Chlorine test strips

16. Approved Disinfectant- definition states EPA products need use indicated in schools & child care settings. Does that mean that use in those settings needs to be specifically stated on labels? Example: Lysol wipes are common, but I haven't been able to find anything indicating use for schools/child care on their label. Is there somewhere else we need to look to determine if products meet the requirement? If use in those settings isn't indicated, does that mean those products can't be used in centers at all or only that they can't be used for diapering/toileting/lavatories? Any clarifications much appreciated.

Answer: When looking at sanitizers or disinfectants always get the EPA reg #. Additional information is available on the EPA master label from the EPA website and may be searched by reg# <https://ordspub.epa.gov/ords/pesticides/f?p=PPLS:1>. Only approved disinfectant can be used where disinfection is required by .2800. Products must be used in compliance with the label.

17. I looked at the site but still not completely clear on finding the needed wording but will keep looking. With the new definition, will we not take into consideration whether or not it is listed for norovirus?

Answer: Norovirus efficacy will not be a requirement. There will be a long list of establishments on the master label...keep looking. If you have searched and found the master label based on the EPA reg#.

18. I've been asked by child care providers if, like the exception for schools, they could request that a restriction be placed on their license that no children shall be allowed in the kitchen to be exempt from hazardous items storage in the kitchen being locked in the kitchen.

Answer: This provision only applies to child care centers located in schools using the school's cafeteria to meet their minimum kitchen requirement.

19. Is inaccessible understood to mean 5 feet above the floor? (Referencing purse storage)

Answer: Yes, for PRODUCTS listed in b, c and d of 2820. It could also be used for purses that are not considered products. However, if you have a purse below five feet but located behind a child proof lock that could also be deemed inaccessible.

20. Potable water - can include water from a classroom hand sink?

Answer: Yes, for filling a water play center

21. Where is tobacco use allowed, is it allowed at all? For example, if they had an outdoor area designated for employees to smoke that was located away from the outdoor learning environment and building would that be okay?

Answer: The rule was changed to come in compliance with DCDEE. No tobacco products are allowed on the premises.

22. Not following written procedures is marked under which number?

Answer: not following the plan is marked under #41 (4-point demerit item). Not having the procedure on file is marked under #42 (2-point demerit item)

23. For the PPE items including aprons, shoe covers, hair restraints - are these required or optional?

Answer: Required