



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

ROY COOPER • Governor
KODY H. KINSLEY • Secretary
MARK BENTON • Deputy Secretary for Health
SUSAN KANSAGRA • Assistant Secretary for Public Health
Division of Public Health

January 18, 2023

POSITION STATEMENT: Use of QSR Glass and Multi Surface Cleaner in lieu of Detergent Solution in Child Care Centers

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

SOURCE: Children's Environmental Health

QUESTION/ISSUE: Can QSR Glass and Multi Surface Cleaner be used as a substitute for the required detergent solution (soapy solution) to meet the cleaning requirements of 15A NCAC 18A .2812, .2819 or .2822 of the NC Child Care Sanitation Rules?

ANSWER: No

DISCUSSION AND RATIONALE:

Currently, there are child care centers in North Carolina using QSR Glass and Multi Surface Cleaner to meet the cleaning requirements for diaper changing and toy cleaning under 15A NCAC 18A .2800 Child Care Sanitation Rules. According to product information provided to the Department, this product is recommended to be used for glass cleaning and is not labeled as a detergent or a soap. Using this product as a substitute for the required soapy solution is a violation of the following child care sanitation rules:

- 1) **15A NCAC 18A .2819 (d) (9) requires a detergent (soapy water) solution during the diapering procedure.** The Department has determined that this product is not considered a soapy water solution; therefore, it does not meet the requirements of **15A NCAC 18A .2819 (d) (9)**.
- 2) **15A NCAC 18A .2820 (b) specifies that cleaners be locked during storage.** This product is classified as a cleaner and is required to be locked when not in use. **15A NCAC 18A .2820(c)** provides that detergent (soapy water) solutions used for diaper changing are not required to be locked but must be stored out of reach of children. Storing out of reach of children, but not locked, allows easy access and encourages appropriate cleaning during

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF PUBLIC HEALTH

LOCATION: 5605 SIX FORKS RD, RALEIGH NC 27609
MAILING ADDRESS: 1632 MAIL SERVICE CENTER, RALEIGH NC 27699-1632
www.ncdhhs.gov • TEL: 919-707-5854 • FAX: 919-845-3972

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

the diapering process. QSR Glass and Multi Surface Cleaner stored in centers unlocked when not in use is a critical violation resulting in a provisional classification.

- 3) **15A NCAC 18A .2822(a)** provides that mouth-contact surfaces be washed, rinsed, and sanitized. Soapy water is specified by rule in this procedure. Using a glass cleaner and then sanitizing mouthable toys in rooms for children who are not toilet trained is a violation of .2822.

Furthermore, information provided by the manufacturer indicates that this product requires a rinse step on food contact surfaces. The Department applies the same procedures and safety measures for toys as food contact surfaces due to mouthing of toys by children. Sanitizers for use on food contact surfaces or mouthable toys that require a rinse step are not approved for use under .2800. Although not considered a sanitizer, this product requires a rinse step on food contact surfaces; therefore, it would not meet the requirements for cleaning mouthable toys.

RESPONSE/INTERPRETATION:

QSR Glass and Multi Surface Cleaner is not considered a substitute for soapy solution and does not meet the cleaning requirements of 15A NCAC 18A .2812, .2819 or .2822. Continued use of this product as a substitute for a soapy water solution is a violation of the *15A NCAC 18A .2800 North Carolina Child Care Sanitation Rules*. QSR Glass and Multi Surface Cleaner can be utilized in North Carolina child care centers as a glass cleaner or multi surface cleaner provided it is utilized in accordance with the manufacturer's instructions and stored per 15A NCAC 18A .2820(b) when not in use.

REFERENCES:

Rules Governing the Sanitation of Child Care Centers 15A NCAC 18A .2800

NOTE: Position statements are policy documents 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.