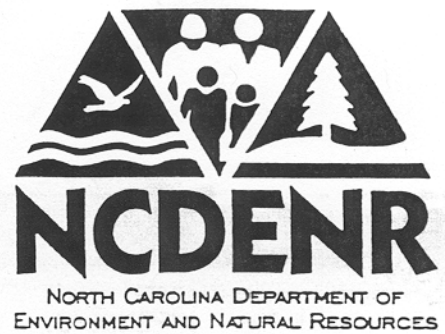


State of North Carolina  
Department of Environment  
and Natural Resources  
Division of Environmental Health

James B. Hunt, Jr., Governor  
Wayne McDevitt, Secretary  
Linda C. Sewall, Director



January 9, 1998

MEMORANDUM

TO: Jim Poole, MD

FROM: Ed Norman, Program Supervisor

SUBJECT: Handwash lavatories in diaper changing areas

In response to your inquiry regarding the minimum handwash lavatories for diaper changing areas in a licensed child care center, I have tried to summarize below the main points of our discussion from earlier this week. The administrative rules governing child care sanitation address this issue in 15A NCAC 18A.2819 (d), (i), and (j). According to paragraphs (d) and (i) there must a handwash lavatory for the caregivers to use after each diaper change. According to paragraph (j) the children's hands must also be washed after each diaper change. The rules do not require that separate sinks be available for the caregivers and the children (i.e., the children's hands may be washed in the sink provided for the caregivers) so long as the water is tempered in accordance with requirements for child-accessible lavatories. As you pointed out, there is not a strong argument that a need exists for separate sinks on the basis of cross contamination, since both caregivers and infants and toddlers in diapers are likely to have feces soiled hands.

However, in discussing this issue with Frances Breedlove of the Wake County Health Department I discovered that at The Growing Child child care center all of the lavatories located in the diaper changing areas in question are built low to the ground for independent use by the children. There are currently no handwash lavatories provided for the caregivers. The problem apparently stems from a change in the intended use of these rooms which were originally designed for older children who were not in diapers. To remedy this situation, the provider has two clear choices. They may raise the level of the sinks so that they are designed for adult caregivers and thus meet the minimum requirement of one handwash lavatory for caregivers (the water would still need to be tempered to allow for child access). Or, they may leave the existing sinks alone and add a separate handwash lavatory for the caregivers.

I hope this information has been helpful. Please call me at (919) 715-3293 if you have any additional questions.