

Mrs. Joanna Stout  
542 Pinewood Avenue  
Salisbury, NC 28146

December 19, 1996

Ms. Sheila Nichols  
Regional Consultant  
724 North Minton Road  
Wilkesboro, NC 28697

Dear Ms. Nichols:

Re: Interpretation of Statute G.S. 110-91.2819(f) "*Caregivers may dispose of feces in diapers in the toilet, but shall not rinse soiled cloth diapers, or training pants or cloths.*"

As I discussed with you briefly on the telephone today, I was given your name by Mr. Clarence Fox of the Rowan County Environmental Health Services Department of the Rowan County Health Department. I am writing to request an interpretation of the above-referenced paragraph of a subsection of a North Carolina General Statute concerning the disposition of fecal matter in a child's underwear.

My interpretation is that the subsection is quite clear that fecal matter may be disposed of in the toilet. Although the wording says "diapers," I feel it was worded thusly in the interest of expediency and was not intended to mean fecal matter could only be disposed from diapers. However, the caregivers at my child's facility have been led to believe cannot dispose of the fecal matter from underwear nor rinse the garments.

I do not ask that they rinse the garment, only that they dump the solid waste in the toilet. The teachers are in proximity to the toilet when they find the fecal matter and it seems to me to be much more sanitary and expedient to dump what can be dumped at that time. Currently, the policy is to retain this matter, wrap it in the underwear, place it in a plastic bag, and put it in the child's cubby for the parent to take home and discard.

Not only does this practice contaminate everything in my child's bag but it appears to me to be a potential health hazard. This process allows the potential for there to be 14 (or 28 in a double room) bags of feces in the little cubbies, even more if a child is very incontinent. (I realize this is an exaggeration but I think consideration must be given to the fact that there is nothing to prevent this possibility.) The children are sent to their cubbies for various reasons during a day. They may be waiting for their lunch, they may be being disciplined, or may be there for any of a number of other purposes. There they sit with a bag of feces above their heads and other fecal bags sitting in other cubbies nearby. Many children's diseases are passed via airborne

Ms. Sheila Nichols  
December 18, 1996  
Page 2

particles. This procedure seems to create an environment ripe for the spread of disease. I strongly feel that this risk can be greatly diminished by the teacher disposing of as much of the solid matter as possible. Then the garment can be wrapped in a plastic bag and sent home.

You mentioned that there was some concern that dumping the feces presented more of a health hazard. I would like more information on this viewpoint as it is difficult for me to envision. It may be that this argument dealt more with younger children who actually wear diapers rather than training pants or underwear more than it would my specific situation.

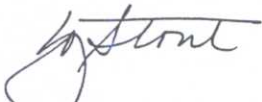
My child is two years old and attends a day care in Rowan County. I feel the center is an exceptional facility which makes every effort to comply with state requirements. They have indicated their willingness to work with me as long as my request does not conflict with their legal guidelines and requirements.

Therefore, I respectfully request an interpretation of paragraph (f) as indicated above. I do feel that a consideration may be to re-word the section by adding a paragraph to differentiate between the areas (diapers versus underwear or training pants versus blood). It will be difficult to adequately word one statement and expect it to address the disposition of all of these.

Another item you mentioned was there are sometimes conflicting guidelines for the daycare facilities to follow. I do not have a copy of the child care requirements but was told by my daycare that they did not see this item addressed specifically enough to answer my question. I would further request that every effort be made to coordinate these two areas (health and child care requirements) so that undue pressure is not exerted on the daycares to comply with contradicting procedures. Their job is difficult enough dealing with the care and nurturing of our children.

I appreciate your willingness to speak with me and look forward to your response. I would be happy to discuss with you further my position on this. My telephone numbers are (704) 642-1993 at work and (704) 642-1213 at home.

Sincerely,



Joanna Stout

/ss

C: Mr. Ed Norman, Environmental Health Services Section  
Mr. Clarence Fox, Rowan County Health Department  
Director, My Daycare Facility



State of North Carolina  
Department of Environment,  
Health and Natural Resources  
**Division of Environmental Health**  
**Environmental Health Services Section**

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary  
Linda C. Sewall, Director



February 7, 1997

Mrs. Joanna Stout  
542 Pinewood Avenue  
Salisbury, NC 28146

Dear Mrs. Stout:

This letter is in response to your request for an interpretation of 15A NCAC 18A.2819 (f), *Caregivers may dispose of feces in diapers in the toilet, but shall not rinse soiled cloth diapers, or training pants or clothes.* You have indicated that the caregivers at your child's day care facility do not believe that they should dispose of the fecal matter from underwear nor rinse the garments. Their current policy is to retain the feces, wrap it in the underwear, place it in a plastic bag, and put it in the child's cubby for the parent to take home and discard. You have also indicated that you are not asking that they rinse the garment, only that they dispose of the solid waste in the toilet. In review of the North Carolina Administrative Code, it is the interpretation of the day care sanitation program that fecal matter may be disposed of in the toilet from diapers (or underwear). The decision to do so is up to the day care provider.

However, Joyce C. Redding, the Nurse Epidemiologist with the Communicable Disease Section was consulted about this matter. Her comments were that all reference materials made available to her agency indicate that it is appropriate policy for soiled diapers or training pants to be wrapped in plastic, kept separate and away from food preparation areas, food serving areas and children for the parents to take home (see enclosures). The Communicable Disease Section also recommends feces should not be disposed of in the toilet from soiled diapers or training pants. They are unaware of reference materials that suggest disposal of feces from diapers in the toilet is an appropriate day care policy.

In summary, although 15A NCAC 18A.2819(f) allows for disposal of feces from diapers (or underwear), the decision to do so is up to the day care provider. Furthermore, such practice is discouraged by the Communicable Disease Section. As a result of your inquiry, the Children's Environmental Health Branch is considering recommendations to change the wording of this rule to prevent the disposal of feces from diapers in the toilet. However, your concern regarding the potential danger of feces stored in a child's cubby is valid and, the use of such areas for this type of storage is inappropriate if children continue to have access.

If I can be of further assistance please call me at 910-973-8622.

Sincerely,

*Sheila F. Nichols*

Sheila Nichols, Regional Environmental Health Specialist

cc: Ed Norman, Children's Environmental Health Branch  
Clarence Fox, Rowan County Health Department  
Joyce Redding, Communicable Disease Section  
EHSS Standard Distribution List

Outline for Caregiver Training

Reduction in Transmission of Infectious Disease  
in Child Day Care Project\*

AUG 25 1990

University of North Carolina at Chapel Hill

Jonathan B. Kotch, MD, MPH  
Principal Investigator

Co-Investigators

School of Public Health

Robert W. Edwards, Ph.D.  
Philip Gallagher, Ph.D.  
David Weber, MD, MPH  
Kristen Weigle, MD, MPH

School of Medicine

Frank A. Loda, MD

The Frank Porter Graham  
Child Development Center

Richard M. Clifford, Ph.D.  
Thelma Harms, Ph.D.

Staff

Ann Faircloth, Ph.D.  
Colleen Potter

\*Supported by Project #MCJ 373111  
Office of Maternal & Child Health,  
Bureau of Maternal and Child Health and Resources Development,  
Health Resources & Services Administration  
Department of Health and Human Services

October, 1989



6. Provide a belt or strap to restrain the child or add a guard rail. If you have no restraint, you must always keep a hand on the child. Never leave the child unattended, even for a second.

Discuss different ways the child can be secured.

7. Provide convenient storage for all supplies including creams, lotions, and cleaning items, and keep out of the reach of children. Never give a child any of these to play with while being diapered since s/he could be poisoned.

### C. Diapering Sequence

1. Check to be sure supplies you need are ready. Place paper or other disposable cover on diapering surface.

GIVE HANDOUT to participants.

2. Pick up the child. If the diaper is soiled, hold the child away from you.

Review handout and ask if there are any questions.

3. Lay the child on the diapering surface. Never leave the child unattended (use a securing strap or guard rail).

4. Remove used diaper and clothes.

5. Discard the used diaper in a lined, covered step can.

6. Put soiled clothes or cloth diaper in a plastic bag to be taken home.

7. Clean the child's bottom with a premoistened disposable wipe, paper towel, or wash cloth. Wipe front to back. Repeat with fresh wipes as necessary. Once child is visibly clean wipe again with fresh wipe.

Emphasize importance of wiping front to back.