



ANNOUNCEMENT: C-09 #04
EI-09 #16
ELS/HS #11
ELS/KS-09 #39
ELS/NFP #08
ELS/PCHP #07
ELS/PKC #63
S-09 #14

OFFICE OF CHILD DEVELOPMENT AND EARLY LEARNING
BUREAU OF CERTIFICATION SERVICES
BUREAU OF EARLY INTERVENTION SERVICES
BUREAU OF EARLY LEARNING SERVICES
BUREAU OF SUBSIDIZED CHILD CARE SERVICES

ISSUE DATE: September 25, 2009
EFFECTIVE DATE: September 25, 2009
SUNSET DATE: On-Going

SUBJECT:	Use of Hand Sanitizers in Early Childhood Programs
TO:	All Regulated Child Care Facilities; Child Care Information Services; Children's Trust Fund Grantees; Early Intervention Coordinators; Early Intervention Providers; Early Intervention Technical Assistance; Executive Directors for Preschool; Head Start Supplemental Assistance Grantees; MH/MR Administrators; MR Coordinators; Nurse Family Partnership Grantees; PA Key and Regional Keys; PA Pre-K Counts Grantees; Parent-Child Home Program Grantees; Preschool Program Specialists; Preschool Supervisors; Special Education Directors
FROM:	Harriet Dichter Deputy Secretary, Office of Child Development and Early Learning

A handwritten signature in black ink that reads "Harriet Dichter".

PURPOSE:

To provide information regarding the use of hand sanitizers in early childhood programs that must comply with the Department of Public Welfare's regulations for child care facilities. This information is also being shared with early childhood programs that are not required to comply with the regulations for child care facilities for information purposes and as a resource regarding the use of hand sanitizers.

BACKGROUND:

The outbreak of H1N1 influenza and resultant media coverage has increased awareness of hand hygiene and practices that prevent the spread of illnesses. Many publications that focus on preventing the spread of illness, including H1N1 flu, recommend the use of hand sanitizers when hand washing is not an available option or as a supplement to hand washing. As a result, the Office of Child Development and Early Learning is receiving an increased number of questions regarding the use of hand sanitizers in early childhood programs that must comply with the Department's child care facility regulations.

The child care facility regulations require hand washing as follows:

- A staff person shall ensure that a child's hands are washed before meals and snacks, after toileting and after being diapered (see 55 Pa. Code §§3270.134, 3280.134 and 3290.134, relating to child hygiene).
- A facility person shall wash his hands before meals and snacks, and after toileting and after diapering a child (see 55 Pa. Code §§3270.152, 3280.152 and 3290.152, relating to adult hygiene).

The regulations do not specifically address the use of hand sanitizers; therefore, programs are looking for guidance regarding using hand sanitizers in an effort to prevent the spread of disease.

DISCUSSION:

Child and adult hand washing is required by regulation before meals and snacks, after toileting and after diapering. The use of a hand sanitizer is not a substitute for hand washing in meeting the regulation.

Many hand sanitizers are alcohol based. This poses a potential risk to a child who may ingest the hand sanitizer. For this reason, if an early childhood program wants to permit the use of hand sanitizers by adults, children or both adults and children, the program must exercise basic precautions.

Hand sanitizers may be used to supplement hand washing outside the regulatory requirements for example, using a hand sanitizer after blowing one's nose, before and after handling toys, etc. An early childhood program is not required to use hand sanitizers. If a program wants to use hand sanitizers, the program must follow the guidelines below:

1. Read the label before using a hand sanitizer. If the instructions on the hand sanitizer prohibit its use for children, the hand sanitizer should not be in the facility. Also, note any age restrictions on the label and follow those restrictions. At all times, follow the directions on the product label.
2. When visible soil is present on the hands, hand washing is required. Use of a hand sanitizer is not an effective way to remove visible soil from the hands.
3. Facility persons and children may not use a hand sanitizer as a substitute for hand washing as required by regulation:
 - A child's hands must be washed before meals and snacks, after toileting and after being diapered.
 - A facility person must wash his hands before meals and snacks, after toileting and after diapering a child.
4. The provider must obtain written parental permission for a child to use a hand sanitizer prior to permitting a child to use a hand sanitizer. The signed parental permission must be kept on file in the child's record at the facility.
5. Hand sanitizers must be inaccessible to children when not in immediate use.

6. A staff person must be physically present with and supervising a child who is using a hand sanitizer. The staff person must remain with the child until the hand sanitizer has dried on the child's hands.
7. The steps for using a hand sanitizer are as follows:
 - Apply an appropriate amount of the product to the palm of one hand (refer to the directions on the label of the hand sanitizer).
 - Rub hands together.
 - Rub the product over all surfaces of hands and fingers until hands are dry.

NEXT STEPS:

1. The operator of an early childhood program should determine whether hand sanitizers will be used at the facility and whether they will be used by adults, by children or by both adults and children.
2. Prior to introducing hand sanitizers to the facility, the operator should:
 - a. Prepare any program policies or procedures needed to implement the above guidelines.
 - b. Discuss with staff the guidelines and any new policies or procedures resulting from the decision to use hand sanitizers.
 - c. Make parents aware that hand sanitizers will be in the facility and the guidelines that the program must follow in using the hand sanitizers. It is recommended that information provided to parents include the brand(s) of hand sanitizer the facility will use.
 - d. If hand sanitizers will be used for children, obtain the required signed parental permission.
 - e. Develop a method for staff to identify children who are permitted to use a hand sanitizer.

Regulated Child Facility Operators Should Direct Comments and Questions Regarding this Announcement to the Appropriate Regional Office of Child Development and Early Learning: Central Region 800-222-2117; Northeast Region 800-222-2108; Southeast Region 800-346-2929; Western Region 800-222-2149.

All Other Comments and Questions Regarding this Announcement Should be Directed to OCDEL at (717) 346-9320.