It has been brought to our attention that the use of hand sinks in Child Care Centers as a multiple purpose sink is common practice and needs further clarification from our office.

The use of hand sinks in Child Care Centers are being utilized for the purpose of washing/rinsing baby bottles, making/discarding formula, tooth brushing activities, rinsing of diapers and soiled clothing, and cleaning toilet training equipment.

Child Care Centers which provide early childhood development programs, including Head Start classrooms, may utilize hand sinks for tooth brushing activities provided the hand sink is located in either the appropriate restroom or within the classroom. The hand sink must be sanitized prior to the tooth brushing activity.

Hand sinks used for the purpose of washing/rinsing baby bottles, making formula, rinsing of diapers/soiled clothing, or cleaning toilet training equipment is prohibited and should be debited as a violation of either 64CSR17 “Food Establishments Rule”, which has adopted, by reference, the 2005 FDA Model Food Code, or 64CSR21 “Child Care Centers Rule” (whichever rule applies).

• Section 5-205.11 (B) of the 2005 FDA Food Code states: “A hand washing sink may not be used for purposes other than hand washing.” Washing/rinsing of baby bottles and making/discarding of formula in a hand sink would be a violation of 64CSR17.

• Section 9.10 of 64CSR21 “Child Care Center Regulations” states: “Hand washing sinks shall not be used for rinsing soiled diapers or clothing or for cleaning toilet training equipment.” Depending on the location and use of the hand sink, any child care center utilizing a hand sink for this purpose would be in violation of 64CSR21 and/or 64CSR17.

The following guidance, provided by DHHR Child Care Licensing, is from the National Health and Safety Performance Standards (better known as Caring for Our Children) reiterates language in our Rules. According to DHHR Licensing, most child care center directors are familiar with this resource and these standards provide the basis for much of the content in their child care center regulations:

• STANDARD 4.8.0.4 FOOD PREPARATION SINKS

The sink used for food preparation shall not be used for hand washing or any other purpose. Hand washing sinks and sinks involved in diaper changing shall not be used for food preparation.
• STANDARD 5.4.1.11 PROHIBITED USES OF HAND WASHING SINKS

Hand washing sinks shall not be used for rinsing soiled clothing or for cleaning equipment that is used for toileting or for the disposal any waste water used in cleaning the facility.

Should you have further questions/concerns regarding this issue, please contact the Office of Environmental Health Services, Public Health Sanitation Division @ 304-558-2981.

References

64CSR17 “Food Establishments”
2005 FDA Model Food Code
64CSR21 “Child Care Center Regulations”
National Health and Safety Performance Standards (Caring for Our Children)

History

Replaces local memorandum dated January 18, 2011.

Attachments