

## Criteria for assessing "access to chemicals"

This guidance document is meant to assist child care staff members and administrators with identifying chemical products that need to be kept out of the reach of children and how those products are assessed as being inaccessible. This document does not replace the rule requirements, but provides additional information to assist programs in being compliant with rule requirements. For situations not covered by this guidance document, licensing specialists will assess those situations according to rule requirements and the information provided here. If you have questions regarding chemical accessibility it is always best to speak with your licensing specialist or licensing supervisor.

Rule 5101:2-12-15 (A)(8) states, in part, "Cleaning and sanitizing equipment and supplies shall be stored in a space that is inaccessible to children."

Guidance: There must be at least one of the following "significant barriers" between the child and the chemicals:

1. Is the storage area or cabinet secured by a functioning child **safety latch or a lock** that is being used appropriately? If yes, then the chemicals are not be accessible to children. If the safety latch or lock is broken or not in use the chemicals are accessible and the program would be cited as having a noncompliance.
2. Are the chemicals **out of reach** of children? Out of reach means a child who is observed in or using that space cannot reach the chemical while his feet are on the floor. Exceptions to this would be if there is a step of some sort, such as a step stool in front of a sink when there are chemicals on the counter next to the sink, or a toilet that is under the shelf that stores chemicals in the bathroom when a child uses the bathroom without the direct supervision of a staff member. For example, a bleach spray bottle in the infant room at the back of a counter would be out of reach and inaccessible. However, in a four year old classroom, where the children could reach the bleach bottle on the counter, the chemicals would be considered accessible.
3. Are the chemicals behind a **closed door** and where is the door? If the door is in the same space used for children's activities (classroom, large muscle area, music room, etc.) then a closed door is not a significant barrier as a child could open the door and possibly even close it behind himself while the teacher is engaged with another child. A door in a children's activity space must be locked if there are chemicals accessible inside the door. (This would include a safety latch or lock that is out of the reach of children.) A door off a space that is not an activity space (kitchen, hallway, entry area, administrator's office, etc.) does not need to be locked, but does need to be closed. Children should be in these areas only while they are being closely supervised and moving from one area to another. The door must be closed to prevent immediate access by a child. The exception to this would be a hallway in which schoolage children are permitted to walk unsupervised (such as to a restroom). Then the hallway would be considered a child activity area and a closed door would not be considered an adequate barrier. The door would need to be locked or latched in a manner that schoolage children could not easily open it.

**Please note:** Centers and type a homes are required to provide a safe environment at all times. When assessing accessibility of chemicals it does not matter if the child is in the parent's care or the child care staff member's care. Chemicals must be inaccessible at all times. When assessing *supervision*, consideration does have to be given as to whether a child care staff member is responsible for the child at the time or if the parent is responsible. The program will not be cited for a parent's lack of supervision. The exception to this would be if the center has a written policy regarding parental supervision and they are not enforcing their own policy.

## Common Chemicals

\* Liquid soap would be the only exception to the standards listed here. Liquid soap, regardless of size of container, does not have to be out of reach of children.

Chemical	Guidance for Assessment	SRNC
Bleach and water and all general cleaning supplies that state " <i>keep out of reach of children</i> "	Must be kept out of reach of children.	Yes
Disinfecting Wipes	Must be kept out of reach of children.	No
Fish Tank Chemicals	Must be kept out of reach of children.	Yes
Fish Food	Must be kept out of reach of children.	No
Hand Lotion	Must be kept out of reach of children. Must have JFS 01217 completed prior to use by children.	No
Hand Sanitizer	Staff may use according to rule requirements. Sanitizers must be kept out of the reach of children.	No
Laundry Detergent/Starch/Powder Dishwashing Soap	Must be kept out of reach of children.	No
Liquid Soap *	May be accessible to children in any size container. It is recommended to keep bulk containers of liquid soap out of the reach of children, but programs will not be cited.	N/A
Paint Cans or Paint Spray Cans	Must be kept out of reach of children. Most labels state "Can be harmful or fatal."	No
Permanent Markers	Unless the label states " <i>toxic</i> " or " <i>keep out of the reach of children</i> " markers may be accessible to children. (Most labels state " <i>non-toxic.</i> ")	N/A
Shaving Cream	Most can labels include the warning " <i>keep out of reach of children</i> " and " <i>avoid contact with eyes.</i> " It is recommended that programs no longer use shaving cream with children and to substitute another non-irritating substance for sensory motor experiences.	N/A
White-out	Must be kept out of reach of children. Most labels state "Can be harmful or fatal."	No

**Please note:** any product for which the label states "keep out of the reach of children" should be made inaccessible to children.