

Office of Facilities Planning, Room 1060 Education Building Annex, Washington Avenue, Albany, NY 12234
Telephone: (518) 474-3906, Fax: (518) 486-5918 <http://www.emsc.nysed.gov/facplan/home.html>

May 2007

TO: District Superintendents Superintendents of Schools Nonpublic School Administrators Charter
School Administrators

FROM: Carl Thurnau, P.E.
Coordinator of Facilities Planning

SUBJECT: Green Cleaning Product Update

New York State law requires the use of environmentally sensitive cleaning products in public and nonpublic schools (www.ogs.state.ny.us/bldgadmin/environmental/s5435.pdf.) In August 2006, the New York State Office of General Services (OGS) released

Guidelines for the Procurement and Use of Environmentally Sensitive Cleaning and Maintenance Products

(www.ogs.state.ny.us/bldgadmin/environmental/GreenGuidelines.pdf).

School districts have raised questions about the use of disinfecting and sanitizing products and antibacterial soaps in schools. This letter addresses the questions related to hand sanitizing products and hand cleaners/soaps. The responses were jointly developed by the State Education Department (SED); the State Department of Health (DOH), Environmental Conservation (DEC), and Labor (DOL); and the State Office of General Services (OGS).

A. Hand sanitizing lotions and wipes

Question

Do the *OGS Guidelines* apply to hand sanitizing lotions or wipes?

Answer No. Alcohol-based hand sanitizers (ABHSs) and alcohol-based hand wipes are not hand cleaning products and were not included in the *OGS Guidelines*. When considering the use of ABHSs, school officials should remember that these products are **not** a substitute for proper hand washing (soap, warm water, and friction for 20-30 seconds). Proper hand washing will remove 99% or more of harmful microorganisms from hands. Also, washing will remove soils and contaminants that are often found in soil, such as lead.

However, ABHSs can be effective for reducing the numbers of harmful microorganisms on hands and are an acceptable alternative in the absence of traditional soap and water hand washing facilities.

Question If hand sanitizing lotions or wipes are used in a school, what precautions should be taken?

Answer The decision to use ABHSs lies with each school and is not affected by the *OGS Guidelines*. ABHSs are considered over-the-counter (OTC) drugs by the US Food and Drug Administration (FDA), and, as with any drug, their use can have benefits as well as possible adverse effects. When making a decision to use ABHS products, schools should consider the following:

ABHSs are not cleaning products. Although a hand wipe may remove some soil, the ABHSs do not clean hands, rather they can sanitize the skin surfaces. Furthermore, soil on hands will actually reduce the effectiveness of ABHSs.

Proper hand washing (soap, warm water, and friction for 20-30 seconds) will remove 99% or more of harmful microorganisms from hands. Also, washing will remove soils and contaminants that are often found in soil, such as lead.

ABHSs can be effective for reducing the numbers of harmful microorganisms on hands and are an acceptable alternative in the absence of traditional soap and water hand washing facilities.

ABHSs can cause skin dryness, irritation, or rashes. If used, select a product that contains an emollient or also provide a moisturizing lotion or cream.

Alcohol is volatile. If room ventilation is poor, alcohol may reach levels in the air that are irritating. This is particularly true when large numbers of individuals are sanitizing their hands at once. If individuals use more of a product than is recommended, and/or if the product is accidentally spilled, this may raise the alcohol levels in the air.

ABHSs are flammable. Static electricity, other sparks or open flames can ignite alcohol on hands. As long as the hands remain wet with the product, the risk of flame ignition exists. Users should be instructed to rub hands thoroughly until dry (approximately 30-60 seconds).

ABHSs can damage building materials when dispensers leak or the product is spilled.

Wipes can add to the solid waste disposal costs of the district and be a flammability hazard if not disposed properly. Also, many of the wipes are synthetic fabrics that are not biodegradable.

Question Hand sanitizer products include a label warning to "keep out of reach of children." Does that mean they should not be used by children?

Answer As noted above, all sanitizing lotions and wipes are considered by the FDA to be over-the-counter (OTC) drugs just like Tylenol, sunscreen lotion, toothpaste, etc. All OTC drugs are required to have "Keep out of the reach of children" on their labels [21CFR330.1(g)]. The warning is not designed to prohibit the use of OTC drugs by children, but is intended to caution that children only use OTC drugs with adult supervision.

Question Does the use of ABHSs reduce school absenteeism?

Answer The evidence is not definitive. Measuring reductions in school absenteeism as a result of using hand sanitizers is difficult because intervention studies tend to mix the use of a hand sanitizer product with other factors such as general hand hygiene education, more total hand hygiene effort per day, and increased teacher supervision of hand hygiene. A number of studies have attempted to evaluate the effectiveness of such interventions and tend to show reduced rates of absenteeism compared to not using hand sanitizers. However, the actual amount of reduction that can be attributed directly to the use of the hand sanitizer product itself as opposed to the other factors is uncertain. Similar benefits might be obtained by more frequent and careful hand washing with plain soap and water.

B. Anti-bacterial /anti-microbial hand cleaners and hand soaps

Question Are hand washing products that make anti-microbial claims referenced in the *OGS Guidelines*?

Answer As noted in Sections VI.C.2 and VII.F of the *OGS Guidelines*, New York State adopted an existing standard for hand cleaners and hand soaps that was jointly developed by Green Seal and Environmental Choice (GS-41/CCD-104). That standard is detailed in Appendix II of the *OGS Guidelines* and notes that the hand cleaner/hand soap product must "make no antibacterial, disinfecting, antiseptic or sanitizing product claims."

This standard was completed by Green Seal and Environmental Choice in June 2006. Only a few products were certified when the *OGS Guidelines* were adopted. Schools were advised that they could postpone purchasing certified products until after January 2007 when a list was expected to be available. **Certified products are now available** (www.ogs.state.ny.us/bldgadmin/environmental/ProductLists.html), and schools should now purchase hand cleaners/soaps from that list for regular use in schools.

We appreciate your efforts to reduce the spread of infection in your school. We also realize that there is a tremendous amount of information, including contradictory information, concerning health and cleanliness. We hope we have provided you with some insight and facts from which you and your school can make an informed decision concerning hand washing and hand sanitizers.