

Accessibility of Chemicals in Child Care Programs

This document is meant to help identify chemical products that must be inaccessible to children and how inaccessibility measures are assessed. This document does not replace rule requirements but provides additional information to assist programs in being compliant. Not all situations are covered, if you have questions regarding chemical accessibility, please speak with your licensing specialist.

Rule 5101:2-12-12 of the Ohio Administrative Code (OAC) for Centers and Rule 5101:2-13-12 OAC for Family Child Care state in part, "Cleaning and sanitizing equipment and supplies shall be stored in a space that is inaccessible to children. Cleaning agents, aerosol cans and all other chemical substances shall be stored in a designated area in their original containers and/or clearly labeled." Rule 5101:2-12-12 OAC for Centers states "School-age children may use cleaning supplies with adult supervision and the cleaning supplies may be stored in spaces used only by school-age children."

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

Is the storage area or cabinet secured by a functioning child safety latch or lock?

If yes, then the chemicals are not accessible to children. If the safety latch or lock is broken or not in use, the chemicals are considered accessible.

Are the chemicals out of reach of children?

Out of reach means a child cannot reach the chemical while their feet are on the floor. Exceptions to this would be if there is a stepstool in front of a sink with chemicals on the counter next to the sink, or a shelf above a toilet that stores chemicals when a child uses the bathroom without direct supervision of a staff member. For example, a bleach spray bottle in an infant room at the back of a counter would be out of reach and inaccessible. However, in a 4-year old classroom, where the children could reach the bleach bottle on the counter, the chemicals would be considered accessible. School-age children may use cleaning supplies with adult supervision and the cleaning supplies may be stored in spaces used only by school-aged children.

Are the chemicals behind a closed door?

If the door is in the same space used for children's activities, then it must be locked. A door of a space not used for children's activities (kitchen, hallway, entry area, administrator's office, etc.) does not need to be locked, but should be closed. If it is an adjoining door to a space used for children, it must be locked.

Please note: Programs are always required to provide a safe environment where chemicals are inaccessible to children. When assessing supervision, consideration will be given to whether a child care staff member or parent is responsible for the child's safety.

Common Chemicals		
Products listed are generic. Manufacturer's label will always dictate the toxicity of the product and therefore may raise the level of risk. The progression of risk is low, moderate, or serious risk non-compliance (LRNC/MRNC/SRNC).		
Chemical	Guidance for Assessment	LRNC / MRNC / SRNC
Bleach, bleach water and all general cleaning supplies that state "keep out of reach of children"	Must be kept out of reach of children.	MRNC
Fish Tank Chemicals	Must be kept out of reach of children.	MRNC
Gasoline, pesticides, poison, flammable substances, windshield washer fluid, aerosol can	Must be kept out of reach of children.	MRNC
Hand Lotion	Must be kept out of reach of children. Box one of the JFS 01217 must be completed and signed prior to use by children. Documentation is not required for nonprescription topical products and lotions. They must be applied according to manufacturer's instructions.	LRNC
Hand Sanitizer	Rule language allows children 24 months or more to use hand sanitizer as a method of handwashing. Therefore, this product may be accessible to this age group. Children under 24 months must have box one of the JFS 01217 completed prior to use. Therefore, this product must be inaccessible to this age group.	LRNC
Laundry Detergent/Starch/Pods/Powder Dishwashing Soap	Must be kept out of reach of children.	LRNC
Liquid Soap	Liquid soap, regardless of size of container, does not have to be out of reach of children, however programs are encouraged to keep bulk containers of liquid soap out of the reach of children.	N/A
Paint Cans or Spray Paint Cans	Must be kept out of reach of children.	LRNC
Permanent Markers	Unless the label states "toxic" or "keep out of the reach of children" markers may be accessible to children.	N/A if non-toxic LRNC if label states "toxic" or "keep out of reach of children"
Shaving Cream	Most labels include the warning "keep out of reach of children" and "avoid contact with eyes". Some common children's activity calls for shaving cream, but programs must actively supervise its use. Programs are encouraged to substitute another non-irritating substance (i.e. whipped cream) for sensory motor experiences.	N/A if actively supervised LRNC if not actively supervised
White-out	Must be kept out of reach of children.	LRNC