

**1) Has non-alcohol based (benzalkonium chloride) hand sanitizer been approved for use in health Care settings? (09/18/18)**

No

**From CMS 09/04/18**

CMS addresses hand hygiene in regulation and interpretive guidance located at §483.80 Infection Control , F880, <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/GuidanceforLawsAndRegulations/Downloads/Appendix-PP-State-Operations-Manual.pdf>. CMS expects adherence to nationally accepted standards of practice from expert organizations in infection prevention and control such as, but not limited to, the Centers for Disease Prevention and Control (CDC), the Society for Healthcare Epidemiology of America (SHEA) and Infectious Disease Society of America (IDSA). The CDC Guidelines for Hand Hygiene in 2002 recommended that Alcohol-based hand rubs (ABHRs) be used routinely when hands are not visibly soiled. Further, “No recommendation could be made regarding the routine use of nonalcohol-based hand rubs for hand hygiene in healthcare settings,” and categorized this as an unresolved issue. More recently, the SHEA/IDSA Compendium on Strategies to Prevent Healthcare-Associated Infection through Hand Hygiene, 2014 reviewed the current literature stating, “For routine hand hygiene, choose an ABHR with at least 62% alcohol”. The [CDC website](#) for Handwashing: Clean Hands Save Lives recommends to use a ABHR that contains at least 60% alcohol. There are many formulations available for ABHRs used in the healthcare setting, but they must minimally contain between 60-95% alcohol.

In 2017 [final rulemaking](#), the FDA deferred its decision to include benzalkonium chloride as safe and effective for use as an Over-the-Counter (OTC) health care antiseptic. Health care antiseptic products include health care personnel hand washes, health care personnel hand rubs, surgical hand scrubs, surgical hand rubs, and patient antiseptic skin preparations (*i.e.*, patient preoperative and preinjection skin preparations). The decision is deferred to allow more time for completion and analysis of studies to address the safety and effectiveness data gaps. Further information on deferral can be found here: <https://www.regulations.gov/document?D=FDA-2016-N-0124-0262>.

**From the CDC**

CDC continues to recommend the use of alcohol-based hand sanitizers in healthcare settings. CDC does not have specific recommendations for use of any non-alcohol-based hand sanitizer.

Non-alcohol-based hand sanitizers may:

- 1) not work equally well for all classes of germs (for example, Gram-positive versus Gram-negative bacteria, *Cryptosporidium* [<https://www.cdc.gov/parasites/crypto/index.html>], norovirus [<https://www.cdc.gov/norovirus/index.html>]);
- 2) cause germs to develop resistance to the sanitizing agent;
- 3) merely reduce the growth of germs rather than kill them outright; or
- 4) be more likely to irritate skin than alcohol-based hand sanitizers.

A thorough review of the topic, including an evidence-based review of the efficacy of hand sanitizers based upon active ingredient, can be found in the CDC’s “Guidelines for Hand Hygiene in Health-Care Settings” (<https://www.cdc.gov/mmwr/PDF/rr/rr5116.pdf>).

Please refer to the following CDC websites for additional information:

“Hand Hygiene in Healthcare Settings” (<https://www.cdc.gov/handhygiene/index.html>) and  
[Hand Hygiene in Healthcare Settings | Hand Hygiene | CDC](https://www.cdc.gov/handhygiene/index.html)  
[www.cdc.gov](https://www.cdc.gov)

In the United States, hospital patients get an estimated 722,000 infections each year. That’s about 1 infection for every 25 patients. Infections that patients get in the hospital can be life-threatening and hard to treat. Hand hygiene is one of the most important ways to prevent the spread of infections.

“Handwashing – Show Me the Science” (<https://www.cdc.gov/handwashing/show-me-the-science-hand-sanitizer/index.html>)

**2) What is the correct address for residents to request a hearing for an involuntary discharge notice?**

*(09/18/18)*

**Department of Health and Welfare  
Administrative Procedures Section (APS)  
P. O. Box 83720  
Boise, Idaho 83720-0036  
Fax 208/639-5741  
Email [APS@dhw.idaho.gov](mailto:APS@dhw.idaho.gov)**