TRSA Hygienically Clean Q&A

The following are adapted from questions received during and after the launch of the Hygienically Clean program via webinar on March 21, 2012.

1. Q. What products and frequency of testing are required?

A. Eventually, the process should test the majority, if not all, products laundered at the facility. During the initial inspection by the TRSA representative, sheets and gowns will be selected for testing. Testing will be conducted on two different products in each of the first three months of subsequent testing. If all test results meet the minimum microbiological performance specifications in the standard, testing frequency will then be on a semi-annual basis.

2. Q. If a laundry is already HLAC accredited, how is the total cost impacted? How will this affect inspection?

A. If a laundry is certified by HLAC, it is exempted from the initial TRSA inspection for three years from the date of the last HLAC inspection. However, before a laundry may be certified under the TRSA Hygienically Clean program, the initial series of microbiological testing must be conducted. The initial cost for TRSA certification would be for the application fee and certification fee. Three years after the last HLAC inspection, the laundry would be subject to a TRSA inspection, and then TRSA inspections would be conducted on a triennial schedule. Therefore, any HLAC certified laundries will be certified faster and save money on the inspection process.

3. Q. How are products selected to be tested?

A. Products will be selected from the end of the processing line after they are packaged and ready to ship.

4. Q. Can you infer a direct relationship between the cleanliness of a process and the same quality in the resultant product?

A. No. Laundries are extremely diverse and their individual plant processes are often significantly different even within the same companies based on machinery, product mix, chemicals, etc. Inferring relationships is subjective; TRSA's certification programs are quantitative. There has been a paradigm shift as healthcare facilities now request textile testing to corroborate and help ensure the effectiveness of the commercial laundry process in producing hygienically clean textiles. The process of laundering, i.e., water temperature, chemicals, finishing, etc. may imply cleanliness but you can only <u>infer</u> the resultant product is hygienically clean.

As the authority on certification of processes, the International Standards Organization (ISO) emphatically states that such certifications do not reflect product quality. Therefore, a laundered product cannot be considered hygienically clean because the cleaning process is certified. The product itself must be subjected to a certification standard. Only then may the product's labeling or packaging be embellished with a certification conformity mark.

TRSA and healthcare facilities demand more than inferred cleanliness. TRSA's Hygienically Clean certification goes beyond the process. Our third-party quantitative product certification does not assume any process always produces hygienically clean textiles. Because TRSA's certification program is a product certification, certification marks of conformity may be displayed on products, product labels, or product packaging.

There are good reasons for process certification and there are good reasons for product certification. The two are not mutually exclusive. TRSA is convinced the time has come for product certification.

5. Q. What pathogens will you test for?

A. We will use USP 61, a test for total aerobic microbial count (TAMC) for bacteria and fungi that may grow under aerobic conditions. The Pass/Fail criterion is \leq 20 cfu (colony forming units).

6. Q. Is certification available outside the United States?

A. Yes, the TRSA Hygienically Clean, Hygienically Clean – Healthcare and Clean Green are international standards. Please contact TRSA for further details.

7. Q. How are the linen samples sent out for testing?

A. Samples are sent to the testing laboratories in sealed plastic bags such as zipper bags found in grocery stores.

8. Q. Some healthcare organizations require HLAC certification. How does TRSA plan to address this issue so that laundries not HLAC accredited but certified hygienically clean by TRSA are recognized equally?

A. TRSA will invest substantial resources to educate healthcare decision-makers, such as environmental services directors, hospital administrators and more about TRSA's Hygienically Clean – Healthcare program and the importance of quantifiable results. In addition, please note whether a facility is requesting "certification" as opposed to HLAC; in such a case, the new TRSA program would qualifies. Any facility requiring HLAC certification should contact TRSA for complete details about the program.

9. Q. Will TRSA provide any interested facility with pre-screening material to help its management decide to pursue the Hygienically Clean certification?

A. The Hygienically Clean standard provides the information necessary to determine whether a laundry meets the requirements. The key requirement is to have a written QA/QC manual that documents the laundry process and OSHA compliance, i.e., Bloodborne Pathogens and/or Hazard Communications. Non-U.S. laundries must document compliance policies and procedures for their respective country. TRSA will provide a list of approved laboratories for conducting the USP 61 test and you can contact them directly to test your products before applying.

10. Q. How many opportunities does a facility have to pass the initial application process?

A. If a plant fails the initial inspection or test, the laundry has 30 days to make corrections and retest. If corrections are made, the laundry will be certified. This applies to the inspection of the facility and microbiological testing. If the laundry is not in compliance within 30 days, the application process starts over.

11. Q. What is the standard for industrial uniforms and industrial garments?

A. These products can be certified under the Standard for Producing Hygienically Clean Reusable Textiles.

12. Q. Is the QA/QC manual available now? If not when will it be available?

A. TRSA inspects each plant's written QA/QC manual that describes the policies and procedures including training and compliance used by the facility. There is no generic QA/QC manual.

13. Q. We have recently invested heavily in HLAC marketing. If we were to convert to Hygienically Clean would there be some form of discount or compensation to make up for the costs of marketing material?

A. HLAC certified laundries do not require inspection by TRSA inspectors until 3 years after the facility's last HLAC inspection, saving the company time and the cost of inspection.

14. Q. How do the anticipated changes in the federal hazard communication standard affect our Hygienically Clean certification?

A. OSHA is modifying its HazCom standard to conform with the United Nations' Globally Harmonized System (GHS) for classifying and labeling chemicals. Rule changes will be phased in beginning December 2013 and our standard will require compliance with them as well as other applicable federal and state regulations.

15. Q. What happens to linen after a non-compliance event?

A. A facility has 30 days to retest its goods to bring the plant back into compliance. Failure to comply will revoke, suspend or modify certification depending on the severity of the non-compliance infraction. Any suspension or revocation requires notification to customers that textiles are no longer certified hygienically clean.

16. Q. Will or is the certification recognized by any of the oversight organizations such as CDC, Joint Commission, etc.?

A. TRSA will approach CDC for recognition of Hygienically Clean certification. Please contact TRSA for further information.

17. Q. What is the link on the TRSA website for the standards?

A. Go to the Hygienically Clean and Hygienically Clean – Healthcare sections under the Certification tab.

18. Q. Is the outline of the program one we need to have in our plants or is it of the certification process itself?

A. Only one document contains all information explaining the requirements for Hygienically Clean certification: the aforementioned *Standard for Producing Hygienically Clean Reusable Textiles* and its healthcare equivalent. A food safety program standard will be available shortly. A copy of the standard should be in every certified plant.

19. Q. Will all classifications be tested for Hygienically Clean?

A. Yes. All classifications/products processed are subject to testing.

20. How does the program relate to the OSHA Bloodborne Pathogen standard?

A. The healthcare and food safety versions of the standard require the laundry to comply with OSHA's Bloodborne Pathogen standard. The "generic" standard does not, as it is intended for laundries that do not handle textiles expected to contain blood. Therefore, we do not hold them to the same requirements as laundries that routinely handle textiles contaminated with blood or other potentially infectious diseases.