Jeff Ellis & Associates, Inc.

Comprehensive Aquatic Risk Management Program Handbook

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THE ATTACHED DOCUMENT CONTAINS BUSINESS INFORMATION THAT HAS BEEN DESIGNATED AS CONFIDENTIAL BY JEFF ELLIS & ASSOCIATES, INC. (E&A).

THE ATTACHED DOCUMENT IS SUBJECT TO A CONSULTING AGREEMENT FOR PROFESSIONAL AQUATIC SAFETY AND RISK MANAGEMENT SERVICES. THE ATTACHED DOCUMENT IS TO BE REVIEWED ONLY IN SUCH OFFICES AND SHALL BE RELEASED SOLELY IN ACCORDANCE WITH SAID CONSULTING AGREEMENT FOR PROFESSIONAL AQUATIC SAFETY AND RISK MANAGEMENT SERVICES AND APPLICABLE LAW.
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Section A: Making it Work and Getting Started

Item 1. What Does “Make It Work!” Mean?

The “Make it Work” philosophy recognizes there are differences in aquatic facility operations and different ways to meet the risk management objectives established by Ellis & Associates as outlined in this handbook.

The International Lifeguard Training Program™ (ILTP®) is a dynamic and proactive program that continues to adapt as risks change in the aquatic industry. Aquatic facility operators should use their professional experiences and perspectives to meet the policies and objectives contained in this Comprehensive Aquatic Risk Management Program Handbook (CARMP Handbook) and the ILTP®.

In recognition that there are different ways to meet the same objective, E&A has developed a variance system that allows for Client facilities to make a formal written request to modify a policy or protocol in this handbook. Approval will be granted only if it can be shown that an equal or a greater standard of guest care and/or lifeguard protection will be achieved. While the vast majority of clients will never need a variance to implement the CARMP, it is available for unique situations to comply with our philosophy of “Making It Work”.

To maintain our position as the respected leader in developing and applying state-of-the-art aquatic risk management techniques and programs, some of the information in this handbook may change. Therefore, you should not consider this handbook a complete listing of the policies and procedures necessary to maintain your Client status. Information on policy and procedure changes will be communicated through the E&A web page at www.jellis.com by newsletters, through CARMP updates, and through e-mails. It is essential that the listed Client contact person(s) from your organization who receives the communications from E&A, reviews, distributes, and implements any program changes that may affect the operation of your aquatic facility. Communication is essential to “Making It Work”.

Partnership. The relationship between E&A and its Clients is a PARTNERSHIP. In order for this partnership to be successful, we must be accountable to each other. E&A is accountable

for providing our Clients with professional consultation, quality training programs, effective communication and quality customer service. Each Client is accountable for the implementation of the CARMP and operationally meeting the standards of care outlined in this handbook. Additionally, each Client is accountable for consistently communicating with their E&A representative and staying informed by reviewing the periodic newsletters, e-mails, and information posted in the Client Services section of the E&A website. The CARMP is ever changing in order to improve and advance professional lifeguarding and proactive aquatic risk management. Do not allow yourself or your facility to lose sight of what it takes to be a great partner and collectively meet our goal of eliminating drowning and catastrophic aquatic events.
Item 2. Getting Started

1. The E&A website provides a Client Services area where each Client has a personal page protected by a user name and password. On this page, you have the ability to manage your Client data and submit information. In this handbook, you will find references to the Client Service area and the tasks that can be completed on the site.

2. All client organizations will be granted an “Admin” account that will (among other tasks) manage purchases and oversee training and account access. The Admin shall identify members of the management team and any ILTP instructors and direct them to create a profile in the E&A system. Upon creation of the profile, the Admin can search for and add each authorized person, granting “User” access. All of your ILTP Instructors are required to, at minimum, have User access on the account to allow for management of classes and completion of mandatory ILTP course administration.

3. Carefully read this handbook and encourage all supervisory and operations staff to read it as well. It is required that all team members with aquatic supervisory responsibilities and Instructor level training be familiar with the policies contained in this handbook.

4. Use the Pre-Season Checklist to help identify any major actions you need to accomplish by prescribed dates and prior to your aquatic season.

5. Once all Users have read the handbook, the account Admin should electronically submit the “Handbook Agreement Form” acknowledging that all necessary personnel have reviewed it. Submission should be completed by March 31st of each year.

How to use this handbook: Objective driven Policy Statements and Standards are outlined in the Handbook. Additional details are noted in the handbook and within E&A Client Service accessed via jellis.com. The Handbook Acknowledgement confirms that this handbook and all related documents have been read and understood. The Handbook Acknowledgement form is available to the account Admin and can be found in the Client Services “Accounts” tab, “Contracts/Agreements” link, “View Handbook Sign-off (this is electronically submitted).

If you have any questions concerning the contents of the handbook, please contact your designated Client Manager for clarification.

Let’s work together to “Make It Work” in preventing loss of life due to drowning.
Section B: Administration, Pre-Season, and Operations Checklist

1. Use the **Pre-Season Checklist** to identify and complete any major administrative, training, and related tasks by prescribed dates and prior to your aquatic operating season.

2. The **Operations Checklist** can assist you in identifying and managing operational and safety issues, before and during the aquatic season. Please note that this is only a *partial listing* of potential operational and safety issues you may need to address. It is further recommended that in addition to careful review of this handbook, you also review your state pool code, the Model Aquatic Health Code (MAHC) Standards, and any other applicable regulations for additional operational and safety requirements.

3. This CARMP Handbook should not be viewed as all-inclusive regarding applicable state, local, MAHC and/or federal requirements to operate an aquatic facility. It is the responsibility of the owner/operator to review all applicable MAHC, state, local and federal codes/laws that must be followed. The information contained in this Handbook details specific CARMP policies/procedures/standards for the operation of the E&A Client facility as part of a consulting relationship; *not* as a regulatory compliance guide.
**Item 1. Pre-Season Administration and Training Guide**

This Pre-Season Guide will assist you in planning and preparing for the major administrative and training tasks that should be completed before opening your aquatic facility.

**Administration Tasks**

- Comprehensive Aquatic Risk Management Program Handbook Acknowledgement form is completed in your Client Services “Accounts” tab before March 31st. The acknowledgement form becomes available in Client Services on or about January 1st of each year.
- Update the “Accounts” area in client services annually including facility information and users.
- Enter all aquatic facility(s) details in the “Facility Information” section under the “Accounts” tab located in Client Services. Enter the following information before March 31st:
  - Facility(s) physical address(es), (Street name and number, city, state, zip) and phone numbers for each facility.
  - Dates of operation and facility hours
- Review your Aquatic Emergency Action Plan(s) (EAP) and update your Aquatic EAP if you made any plan changes, added attractions, and/or modified your facility(s). An Aquatic EAP Template is available for download in the “Client Templates” section of E&A Client Services “Library” tab.
  - Emergency Action Plan. Section E
- Review your Crisis Management Plan; update your Crisis Management Plan if you made any personnel changes, added responsibilities, and/or modified your response.
  - Ensure a written plan is in place for managing a catastrophic incident.
  - Catastrophic incident planning. Section C
- If needed, submit any variance requests to your E&A Client Manager. Client variance requests will be submitted for any Client policy or protocol that conflicts with established E&A policies or protocols.
  - Request for Variances. Section E
  - Variance Request Form are available at E&A Client Services in the “Library”, “CARMP Handbook Resources” section.
- Adding New Attractions:
  - Request an Attraction Inspection (recommended, but optional). Section E
- Inspect all of your equipment to ensure that it meets E&A standards and is in good working condition. Order any needed equipment early to ensure delivery prior to opening your facility(s).
  - Equipment Requirements. Section D
Training Tasks

- Confirm ILTP Instructor licenses are current/valid and that a sufficient number of ILTP Instructors are available to satisfy your needs for the training season. Schedule staff to attend an ILTP® Lifeguard Instructor course if needed. Visit the E&A website (www.jellis.com) to find the dates and locations of the courses scheduled in your region by clicking on the “ILTP Instructor” link. Register On-line.

- Each ILTP lifeguard Instructor and Instructor candidate shall be provided “User” access to the E&A client services website once candidate is registered for a regional instructor course to facilitate access to the current instructor document package on their ‘Home’ page. To ensure full administrative access for the Client facility, the account Admin will need to provide access to the Client’s account website for the instructor to access course administration pages and other vital resources and information.

- Schedule the ILTP lifeguard class space as needed for each class you will be conducting, including the pool/classroom times/spaces at the facility where you will conduct your lifeguard training.

- Create lifeguard classes in Client Services adequate to complete all staff training of new and renewal lifeguards, keeping in mind the 1:16 instructor to student ratio.

- Assign electronic training materials to candidates by adding their names and email addresses to the appropriate class roster. Monitor their progress in reviewing content leading up to the first day of the class.

- Conduct all ILTP Original training and Renewal training courses in accordance with current requirements and curriculum.

- Submit all Training Credential information online at Client Services using the RCCMD process.

- E&A licenses. Section D

- Ensure at least 1 staff member having vanGUARD™ Aquatic Leadership training is on-site and available during all operating hours. Schedule vanGUARD™ Aquatic Leadership courses as needed, prior to beginning of the operating season.

- At least one staff member at your facility must possess a current, valid Aquatic Facility Operator (AFO) or Certified Pool Operator (CPO) course completion certificate (or comparable course certificate as approved by State or Local requirements).
Item 2. Operations Guide

The Operations Guide can assist you in identifying and managing potential operational and safety issues with respect to the E&A Comprehensive Aquatic Risk Management Program before and during the aquatic season. Please note that this list is comprised of E&A CARMP related items and not specific code requirements - for local, state, MAHC, or federal. It is recommended that you carefully review your state pool code and other applicable regulations for additional operational and/or other requirements.

Operations Tasks

- All E&A lifeguard licenses are properly assigned and available online in the E&A Client Services “Credentials” Tab.
  - Equipment & Training: Section D
- Procedures for facilitating E&A audits are in place
  - Aquatic Facility Operational Audit: Section F
- 10/20 Protection™ standard and 10/3 Protection™ standard are implemented.
  - Guest Protection Standards & Policies: Section E
  - VAT® program is implemented including proper documentation (Section E). All documentation shall be updated and maintained prior and throughout the season. These must be made available for lifeguards and for auditor inspection and must be created on E&A Templates:
    1. Zone of Protection and Zone Coverage established and properly documented for all staffing levels and programming periods.
    2. Zone Validation® system established and documented for all staffing levels and programming periods.
    3. Plan is in place for conducting and documenting OMD/LAD drills
- Water quality allows for detection of testing device (silhouette, manikin, or other device as required by your state pool code) in all pool areas and at all depths. Water clarity: Section E
- Protection of hot tubs/spas
  - Guest protection policies: Section E
- Pool or Attraction Closures
  - Guest protection policies: Section E
- In-service training plan meets requirements and is properly documented. Documentation is available on-site for auditor inspection.
  - In-service training; Section D
- Mandatory Reporting.
  - Lifeguard Rescue Reports: See Section C. A Lifeguard Rescue Report template is available at E&A Client Services (“Library” tab, under the “Client Templates” category). This template can be adopted by the Client or referenced when creating an internal document.
  - Mandatory Unconscious/Spinal Injury/Non-aquatic Event Reporting: See Section C Reporting Serious Incidents to E&A.

After the season is complete, year-end rescue statistics are submitted on-line in Client Services.

Rescue Reporting: Section C

- Daily Inspection Forms are maintained and available for auditor inspection.
  - AED Daily Checklist.
  - Oxygen Daily Checklist.
  - Attraction Opening and Closing Checklists including line items to confirm Pre-Opening & Post Closure bottom scans (bottom is clear), to clearly document that all attractions/pools are clear of any guests prior to opening and following closure of the facility.
  - Verification that the bottoms of all designated swimming areas have been confirmed clear by execution of a complete bottom search for waterfronts (opening and closing).

Templates for the documents referenced above are available in the E&A Client Services website “Library” tab under “Client Templates” section.
Item 3. Administration

a. Client Contact and Account Information

Clients are responsible for providing current client information to E&A. Clients can modify contact information directly in the “Accounts” tab of Client Services. The Client Name and Master Account information can only be changed by contacting your E&A Client Manager.

b. Client Account Information

Every E&A client will execute a Consulting Agreement to formalize the business relationship with Jeff Ellis & Associates, Inc. Most agreements are annually renewed, however, multi-year agreements are available. All Clients are also provided a Client Status Notification Form to execute that is party to the agreement and outlines client name, term of agreement and applicable fees for the term. In the absence of the Consulting Agreement and Client Status Notification being executed, client accounts will be placed on hold and services will be suspended until the agreements are executed and received.

c. Late Payment and Finance Charges

All E&A Clients are extended credit terms of net 30 days for payment on all orders/invoices. After 30 days, a late fee will be applied to each past due invoice in the amount of $100.00/invoice per month. For each subsequent 30-day period, an additional $100.00 fee will be applied until the invoice balance is paid in full. Please contact the E&A Business Office if you have a special circumstance affecting your ability to make payment within 30 days.

d. Personal Check Policy

Jeff Ellis & Associates, Inc. does not accept personal checks. Corporate or Company checks will be accepted. NSF fee of $30.00 will be assessed on all returned checks.

e. Use of the E&A/ILTP Logo and Official Suppliers

We encourage you to use the E&A and/or ILTP logo as part of your lifeguard identification system and to show your pride in the training program and performance of your lifeguards. However, the E&A and ILTP logos are trademarked and protected under copyright laws. To protect and strengthen the E&A brand please contact your Client Manager or our exclusive provider of logoed merchandise: Water Safety Products Inc. http://www.watersafety.com/ prior to using our logo(s).

f. E&A Website - Client Services

All Clients are encouraged to frequently visit the E&A website at www.jellis.com to remain updated on E&A programs and services.

Client Services information and resources are only accessible to Jeff Ellis & Associates, Inc. clients. Client Services is available 24/7 for your review and use.

A DETAILED OVERVIEW OF COMMON TASKS ASSOCIATED WITH CLIENT SERVICES ARE AVAILABLE IN TUTORIAL SCREENCAST VIDEOS, WHICH CAN BE FOUND IN THE “FAQ” AREA.
Section C: Catastrophic Incident Planning and Reporting to E & A

Item 1. Catastrophic Incident Planning and Reporting to E&A

Jeff Ellis & Associates, Inc. has extensive experience in investigating catastrophic aquatic incidents. We will assist clients in identifying causes and managing the after effects through aquatic accident investigation. E&A may also be able to assist in a litigation support role following a catastrophic incident. It is recommended that you involve your corporate/city legal team in developing your catastrophic incident plan so you can use E&A accident investigation and litigation support services most effectively.

a. Developing Your Crisis Management Plan

When developing your facility’s crisis management plan, there are several key points to consider.

Prepare contingency plans in advance. A Crisis management team, with the knowledge and understanding of their roles relative to the team, should be established prior to an event. Once a team is developed and roles are defined, they can be quickly called together to respond to an incident. Therefore, it is recommended that a catastrophic incident team include key management personnel, operations staff, spokesperson(s), and legal counsel. Following a catastrophic incident, team personnel will gather facts and witness statements, take necessary actions, respond to the media if necessary, release a written statement, and handle other related needs.

Prepare a call list. Your call list should include the cell phone numbers, home phone numbers, work phone numbers (if offices are off site), and email addresses of all catastrophic incident team members and other key staff. This call list should be available to all necessary team members and should be documented as part of your written plan. Prompt communication is critical in gathering your crisis management team to assess the incident, gather facts, and take appropriate actions.

Communicate the role of the crisis management team. Immediately and clearly announce internally to all staff that no statements are to be made regarding the incident. The only persons authorized to speak about the crisis to the outside world are the crisis management team members. It is recommended that at least two spokespersons be identified in your catastrophic incident plan. It is also suggested that your spokespersons receive practice training in responding to the media. Scenario training using mock catastrophic incidents that involve possible questions that may be asked is recommended.

Review crisis information management. Review with all members of your staff (not just your lifeguards) how you want them to manage information following a critical incident. Discuss with them your policy on speaking to the media or others. It is recommended that all media or other inquiries be directed to your designated spokesperson.

Plan your statements. Plan ahead as to the statements and words to use and what words or statements to avoid; consider the difference between "patient" and "victim", "drowning" and "incident".

Identify debriefing programs. Identify critical incident stress debriefing programs you can work with following a critical incident. Use your fire and police departments, school district, county, or religious resources to help you determine where you can obtain debriefing assistance before you need it.
**Item 2. Reporting Serious Aquatic Incidents to E&A**

1. You should consider a serious incident to be any aquatic or non-aquatic incident (where lifeguards provided care) resulting in a guest or staff member requiring/resulting in:
   - Resuscitation;
   - Oxygen delivery;
   - CPR;
   - Spinal immobilization;
   - AED use;
   - Outside EMS response.
   - Loss of consciousness

**IMPORTANT NOTE:** Even minor incidents may receive significant media attention depending on the level of news occurring on a particular day.

2. You must call Jeff Ellis & Associates, Inc. at **800-742-8720 within one (1) hour of any incident that meets the definition above.** Failure to comply with this reporting requirement jeopardizes the ability of E&A to properly investigate the incident and assist you legally.
   - If you reach the voicemail system, please listen carefully to all the options to be sure you are directed properly. If reporting outside of business hours, your call may be picked up by an answering service. Once you connect with someone (answering service or E&A staff member), please provide the following:
     - Client name
     - Contact person
     - Direct phone and cell phone numbers
     - Brief description of the incident

   An E&A staff person will follow up with you via the phone numbers you provided when reporting the incident.

**IMPORTANT NOTE: DO NOT CALL YOUR CLIENT MANAGER DIRECTLY TO REPORT A SERIOUS INCIDENT. ALL INCIDENTS MUST BE REPORTED BY CALLING THE E&A BUSINESS OFFICE TO ENSURE PROPER DOCUMENTATION OF THE INCIDENT.**

**Item 3. Mandatory Reporting**

**Lifeguard Rescue Reports.**

A Rescue Report Form will be completed every time a lifeguard physically enters the water to aid a distressed swimmer or to respond to some other type of life threatening emergency. *Guest assists do not need to be documented.*

E&A CARMP Clients are required to submit cumulative end of the year rescue statistics via Client Services, in order to participate in the aquatic safety award program. Therefore, it is important to keep a detailed record of each rescue that occurs in order to facilitate this process. To further assist clients with this task, a Cumulative Rescue Report template is available in E&A Client Services.
Section D: Equipment & Training

Item 1. Lifeguard Equipment

a. Sun Protection Devices

Policy Statement: Lifeguards must wear UV/Polarized sunglasses at outdoor facilities to protect the eyes and reduce glare.

Lifeguards working outdoors must be protected from the environment through the use of:

- SPF 15 or greater sunscreen, (applied as needed throughout the day);
- Shirts, hats, and/or shade structures (such as an umbrella, that protects the head, face, and upper torso from the sun);
- Polarized sunglasses with UV protection;
  - If it is cloudy, sunglasses must remain immediately available if not worn
- Refer to the Operational Safety Audit Criteria available in the ‘Library’ of Client Services and the ILTP course textbook for additional information.

b. Identification

Lifeguards must be clearly identified through the use of:

- Visible Lifeguard or Guard logo on an outer article of clothing, the E&A or ILTP logo, OR the facility logo (Facility logo must distinguish lifeguards from other facility personnel);
- Possession of a rescue tube.

c. Rescue Tubes

Policy Statement: All lifeguards must carry rescue tubes while on duty.

The rescue tube should:

- Be a minimum of 48" in length and allow an unresponsive guest to be rolled over from a face down position on to the tube which facilitates the physical opening of the airway by the lifeguard;
- Be free of any clips or hooks that could injure a guest or lifeguard during a rescue;
- Be narrow enough to be easily held and controlled;
- Have a strap long enough to allow the lifeguard to descend to the deepest part of the Zone of Protection® area;
- Have excess strap held by the lifeguard or a strap holding device to prevent an entanglement injury. The Strap must be worn appropriately.

Lifeguards working at slide run-outs and at non-scanning positions, such as dispatch stations, are exempt from the rescue tube policy without the submission a variance request.

IMPORTANT NOTE: "Slide run-outs" are defined as the extended flume or slide troughs in which riders decelerate. You must not confuse slide run-outs with splash down or catch pools into which riders exit. Lifeguards protecting slide catch pools are required to wear rescue tubes.
d. Whistle

Lifeguard whistles should be:
- Loud enough and of a tone capable of cutting through maximum noise conditions at your facility;
- Secured in manner that allows for immediate accessibility by the lifeguard;
- Accessible and available at all times while the lifeguard is on duty;

e. Resuscitation Mask

Policy Statement: The resuscitation mask must be available within the 10/20 Protection™ standard and/or 10/3 Minutes Protection™ standard, to every lifeguard in the event the lifeguard must initiate resuscitation in the water.

Client facilities will make a resuscitation mask available to each E&A Licensed lifeguard on duty. It is recommended that each on-duty lifeguard have a resuscitation mask in a hip pack or attached to a rescue tube. ILTP protocols call for beginning rescue breathing in the water, for non-breathing unresponsive guests. The resuscitation mask must be capable of making an effective seal in the water and allow for practical simulation of real events (mask should make a complete seal on the face and allow a practice guest in distress to breathe when mask is sealed). E&A recommends the Big Easy Brand Masks.

Item 2. Facility Equipment

a. Personal Protection Devices and First Aid Supplies

All Clients should meet Local, State, Federal, MAHC, and OSHA regulations. Additional information on OSHA’s blood borne pathogen standard can be obtained by contacting your regional OSHA office. First-aid supplies should be well stocked, readily available, appropriate for the lifeguard first responder skills contained in the ILTP curriculum, and/or meet any and all applicable code requirements.

b. Supplemental Oxygen Support System

Training is provided in the ILTP course for the administration of emergency oxygen. Additional information that relates to E&A emergency oxygen protocols include:

- Each facility will provide on-site Supplemental Oxygen Support Systems in sufficient number to facilitate Oxygen being available and ready for delivery within 1 minute of guest extrication.
- A pulse oximetry device should be available and utilized whenever delivering emergency supplemental oxygen to a responsive guest suffering from respiratory distress and/or hypoxia. A fully functional Pulse oximetry device should be available with the oxygen equipment.
- Non-rebreather masks will be maintained in appropriate quantities and sizes (adult and pediatric) for use with responsive guests suffering from respiratory distress and/or hypoxia if oxygen use is indicated.
- Clients will maintain Supplemental Oxygen systems to manufacturers’ recommendations.
- If you encounter problems in re-filling your emergency oxygen unit, see the “CARMP Handbook Resources” support link — Emergency Oxygen Fact Sheet in the “Library” tab of E&A Client Services and/or contact your E&A Client Manager for support.
c. Manual Suction Device

A manual suction device should be facilitated on site with the Supplemental Oxygen Support System equipment to meet EAP operating criteria.

*All manual suction devices must be utilized in accordance with the manufacturers recommendations.*

d. Backboard

ILTP Extrication Standards designate a backboard as the training and program standard for guest extrication from aquatic environments.

Backboards will be provided at each facility to meet EAP Operating Standards (1-minute Extrication for unresponsive guests and 3-minute Extrication for guests with a suspected neck or back injury). The backboard must:

- Be of solid construction, constructed of impermeable material, easily sanitized/disinfected, and in good condition.
- Have a head immobilization device designed to minimize head movement.
- Have a minimum of 3 body straps.
- Have straps that are easily managed and well maintained.
- Allow for easy handling of a suspected spinal injury by two lifeguards.

e. Use of Cervical Collars by E&A Licensed Lifeguards

*The ILTP does not provide training for lifeguard use of cervical collars. As such, E&A Licensed Lifeguards are not authorized to apply cervical collars/related skills to guests with suspected neck and back injuries.*

f. Automated External Defibrillator (AED) Implementation

*Policy Statement: All Clients are required to implement AEDs at all aquatic facilities operated by the Client to meet EAP operating criteria. The AED must be at the emergency scene and available for use within 2 minutes following guest extrication.*

**Approved AED Units**

Any AED device approved by the FDA is approved for use at E&A client facilities. E&A recommends AEDs with pediatric defibrillation capabilities.

**Medical Direction Requirements**

While individual state PAD laws differ slightly, Medical Direction is required for purchase, possession, and use of an Automated External Defibrillator. Participation in protocol development and quality assurance relative to the use of AEDs are some additional roles of the Medical Director. For Client facilities in need of Medical Direction, AED manufacturers provide this service for those purchasing AED units and many state/county regional EMS services offer medical direction. This service is often for a limited time and Clients should be aware of any term limits to medical direction offered at time of AED purchase, and ensure continued Medical Direction beyond the initial period. Continuing Medical Direction in accordance with your individual state PAD laws is required of all E&A Clients using AED equipment.

a. **Maintaining Your AED Unit**

A daily inspection of your AED unit should be performed by a staff person trained in AED procedures technology and who is familiar with the manufacturer specifications of your particular unit. For a sample daily AED inspection form, see E&A Client Services, “Library” tab, “Client Template” section.
The following items should be included with the AED: Extra fully charged battery, towel, scissors, razor, alcohol wipes, & an extra set of electrodes.

**It is imperative that Client facilities document the AED device procedure for exporting event data from the device to the Medical Director**

**b. AED Trainer Equipment**

Clients are required to have an AED Trainer available for use during the initial training of lifeguard staff and subsequent in-service training and EAP drills. AED Trainers should match the actual equipment used by the facility (model, prompting, etc.) to ensure seamless integration.

g. **Trauma Bag**

Trauma Bags, as they are commonly called, are recommended for use by E&A Client facilities. These bags allow for all lifeguard emergency equipment to be stored and easily transported to the scene. The Trauma Bag should include, but is not limited to the following equipment:

- Supplemental Oxygen Support System
- Bag Valve Masks (BVM) for Adult, Child and Infant (although an adult BVM can be used universally for all patients; E&A recommends that you have a BVM for each patient type).
- Non Rebreather Mask for adult & pediatric
- Oxygen Port (If not integrated into resuscitation mask) and additional medical grade tubing
- Manual Suction Unit
- AED (programmed to current ECC Guidelines)
- Resuscitation Mask (E & A recommends Big Easy Mask)
- Personal Protective Equipment
- Pulse Oximeter

A separate “Practice” or “Training” Trauma bag/equipment is required for lifeguard training, in-service training, and EAP drills. This will allow the actual facility EAP Trauma bag/equipment to remain in good condition and ready in the event of an emergency. Training Trauma bag/equipment should match the equipment and setup found in the real bag.

*If an AED is not kept in a Trauma Bag with Emergency Oxygen Equipment as one unit THEN Facility/Attraction Emergency Action Plans are required to direct AED equipment to be brought to the care area for ALL aquatic emergencies involving unresponsive Guests in Distress.*

**Item 3. Lifeguard Training**

**International Lifeguard Training Program™ (ILTP)**

All lifeguards employed at E&A Client facilities participating in the Comprehensive Aquatic Risk Management Program will be assigned an E&A Lifeguard License. All other lifeguards trained in the ILTP will be assigned an ILTP Course Completion Credential.

**a. Transmitting Lifeguard Training Documentation**

A lifeguard is not officially licensed until the corresponding class RCCMD has been completed online and an E&A Lifeguard License has been assigned.

To “Draft” a class, go to the “Classes” tab, “Draft Classes” shortcut, and click on the “Add New Class” button. You will be prompted as to how to proceed.

**b. The Roster and Course Completion Management Document and Skill Competency Workbooks**

*All ILTP courses will be documented with a Roster and Course Completion Management Document (RCCMD).*
The RCCMD serves as the official record of the course and documents completion of required skill competencies, successful completion of the final written exam, and the overall outcome for each candidate. The assigned credential number is also listed for each candidate. The RCCMD should be available for review on site as well as copies of E&A lifeguard licenses and/or ILTP Course Completion Credentials. Electronic copies of RCCMDs and Credentials are acceptable; however, verify with your state and/or local jurisdiction for additional printed credential requirements. Skill Competency Workbooks (SCW) (student version) are distributed to lifeguard candidates prior to any ILTP course, via the ILTP Textbook Link provided to each student at the time of course registration. Each Skill Competency demonstrated during the course is referenced when completing the course RCCMD. Clients conducting Community ILTP Course Completion Credential courses must additionally electronically complete the Skill Competency Workbook Course Objective Log. Instructions for this process are in the “FAQ” section of the Client Services website, under the ‘SCW Log’ screencast.

c. Upgrading an E&A License and converting ILTP Course Completion Credentials to E&A Licenses

An E&A Shallow Water or Pool License can be upgraded to an E&A Pool or Special Facilities License once the lifeguard has completed an Upgrade course conducted by an ILTP Instructor. Likewise, an ILTP course completion credential can be converted to a license to allow the lifeguard to work at a CARMP client facility. Both administrative procedures are performed in the “Credentials” in Client Services.

d. Transferring an E&A License to another E&A Facility

Use the FAQ section of Client Services (or speak to your Client Manager) for information on Transferring an E&A license from one CARMP Client to another, the Client must request from the lifeguard his or her license number and date of birth. Using this information, the Client will search for the license in the Client Services system (“Transfer Credentials” link under the “Credentials” tab in Client Services).

A Transfer Lifeguard License will NOT have the original Instructor’s signature on license due to the fact that the Client facility’s in-house ILTP Instructor is required to pre-check/test the lifeguard’s ILTP skills (Prerequisite skills, all rescue / BLS skills to test ready levels, written and practical test). If the Transfer Lifeguard adequately demonstrates his or her competency to pass the ILTP Lifeguard course, then the facility instructor may sign the transfer license, making it valid at that facility. As with any new employee, the lifeguard should complete the facility’s standard site-specific EAP training, Zone of Protection® training, and other pre-service training. Transfer Licenses for ILTP Instructors from another facility will come stamped as valid in the signature line. Transfers requested from the public side of our Store by licensed lifeguards wishing to have a Course Completion Credential for use at a non-client facility will also come stamped.

As a reminder, Lifeguard Licenses should be marked as “Transferrable” when the lifeguard is required to pay for all or part of the class he or she participated in successfully. In cases where the Client covers 100% of the cost of the class and license, it remains optional for the license to be marked as “Transferrable”. All licenses are marked “Transferrable” by default.

e. Terminating a Lifeguard with an E&A License

If you terminate an E&A licensed lifeguard for failing to meet professional lifeguard duties or safety issues, you remain responsible for marking the lifeguard’s license as “INACTIVE” in Client Services. Your compliance ensures that E&A can revoke the license of the terminated lifeguard and protect your fellow Clients from hiring unqualified individuals.
f. Non-Licensed Personnel

An E&A Client will immediately fail an audit and risk termination of the Client Agreement should an operational aquatic safety audit discover use of unlicensed personnel as lifeguards.

g. Converting an E&A License to an ILTP Course Completion Credential

When an E&A licensed lifeguard leaves an E&A CARMP Client facility to work at a non-E&A CARMP facility, the following process must occur to gain an ILTP Course Completion credential:

- The lifeguard will confirm their license is transferrable, request a copy of their license, and then proceed to the homepage of the E&A public website. The lifeguard will then click on “Store” tab at top of page, select the “Convert to ILTP Certificate” shortcut, and then proceed with entering their license number and date of birth.
- Once the lifeguard’s information has been entered, he or she will proceed to checkout.
- An ILTP Course Completion credential will be sent directly to the lifeguard.
- **IF the E&A Client facility paid for the Lifeguard Training and did not have the lifeguard pay for any part of the training, the E&A license remains the property of the facility and the facility is NOT obligated to provide proof of training to the lifeguard. Conversely, if the lifeguard is required to pay for any portion of their training, the facility is required to provide the proof of training to the lifeguard.**

h. Hiring a Lifeguard with a current ILTP® Course Completion Credential

If you have hired a lifeguard with an ILTP Course Completion Certification, the following process must occur prior to allowing the lifeguard on stand:

- The on-site ILTP Instructor will administer Prerequisite screening (for the appropriate level of training), verify all rescue skills to “test ready levels”, administer the written test, and complete a full Practical test out prior to converting the ILTP Course Completion Credential to an E&A License.
- Documentation of site-specific training and orientation on the facility operations and EAP should be maintained on site.
- The ILTP Course Completion Credential must be converted to an E&A Lifeguard License or the lifeguard is required to receive a new License upon completion of an ILTP Lifeguard course.

i. Site-Specific Training for Lifeguards (Pre-Service Training):

*Policy Statement: E&A Clients are required to provide site-specific (in-house) training for all lifeguards prior to said lifeguards working at on-duty stations.* Training should be documented and it is recommended that all lifeguards sign an acknowledgment of the content and training received. Pre-Service training should include but not be limited to: All EAP’s, Position Responsibilities, Zone of Protection® areas, Zone Validation® system documentation, Emergency Communications, and Rotations.

Item 4. In-Service Training

The Objective of the In-Service training standard is to maintain each E&A licensed lifeguard's skills (Rescue Skills, CPR/FA/AED and Oxygen Administration) at or above a Test-Ready Level. “Test-Ready” is defined as the same level of competency the E&A licensed lifeguard was required to perform to gain the lifeguard license.

*Policy Statement: Mandatory guidelines for providing E&A Licensed lifeguard in-service training to maintain Test-Ready Lifeguard License Standard include:*
If a lifeguard works 20 or more hours per week, a minimum of 4 hours of in-service training per month is required. If a lifeguard works less than 20 hours per week, a minimum of 3 hours of in-service training per quarter, with at least 1 hour In-Service per month, is required. If the lifeguard does not possess test-ready skills and knowledge, and/or is not meeting the terms of their License Agreement at the conclusion of the minimum in-service hours provided above, additional in-service is required until such objectives are achieved. In-service documentation should include the following:

- The date and length of time of the training conducted
- Description of the training session content
- The name of the person who conducted the in-service training
- Lifeguard signatures on the attendance sheets, or other verifiable means of identification of participants (i.e. id swipe, time clock use, etc)

NOTE: All in-service training should be organized and clearly documented. In-service training session logs and Cumulative Individual Lifeguard hours should be available on site.

“Cumulative Monthly Lifeguard In-Service Record” and “In-service Attendance Sheet” templates are available in Client Services, “Library” tab, “Client Templates” section, to assist you with maintaining these records. Regular and high quality in-service training helps ensure that E&A Licensed lifeguards remain knowledgeable and technically competent to deliver proactive aquatic safety and risk management services on a consistent basis.

**Item 5. Aquatic Supervisor Leadership Training (MAHC Compliant)**

All facilities will have at least one person with a valid vanGUARD™ Aquatic Leadership completion certificate on site during operational hours. ILTP Instructors are provided vanGUARD™ Aquatic Leadership Training during Instructor Training and may conduct these courses as needed.

**Item 6. Community Lifeguard Training (ILTP COURSE COMPLETION)**

The ILTP Course Completion program is the same lifeguard course you currently conduct for your E&A Licensed Lifeguard staff. The only difference is the lifeguard, upon successful completion of the course, will receive an ILTP Course Completion Credential as opposed to an E&A License. If a CARMP Client is hiring a lifeguard who possesses a Course Completion Credential, the “Convert Certificate to License” process must be followed as noted above.

**Item 7. CPR/First Aid/AED Courses and Certificates**

Healthcare Provider CPR, Supplemental Emergency Oxygen Administration, AED and Standard First Aid Training are included in the ILTP course. The E&A Lifeguard License and ILTP Course Completion Credential include authorization for certification in all of these courses. All ILTP Licensed Instructors are authorized as E&A Safety & Health Services Instructors for CPR, First Aid, and AED, and may teach community or non-lifeguard staff classes. For additional details, refer to the Safety & Health Services document found at Client Services.

**Item 8. AFO/CPO Certificate**

Ellis & Associates requires that you have at least one or more of your staff complete a Certified Pool Operators Course (CPO), an Aquatic Facility Operators Course (AFO), or a required state/county equivalent certification course. These training courses will help your staff maintain water quality and include risk management related training. Auditors will ask for verification that your facility has at least one staff member who holds a current, valid CPO/AFO completion certificate, or required state/county certificate required as equivalent.
Section E: Guest Protection Standards & Policies

**Item 1. The 10/20 Protection™ Standard and 10/3 Minute Protection™ Standard**

*Policy Statement:* Zone Validation® system summary and Zone of Protection® area documents for each staffing level, should be created and kept accessible at the aquatic facility. It is further recommended that the Zone of Protection® area and Zone Coverage documents be posted at each position as well as provided to and/or posted for lifeguard visibility and reference.

The ILTP 10/20 Protection™ standard of care gives operators the flexibility to assign and station their lifeguards as they deem appropriate. An individual Lifeguard’s Zone of Protection® area can be established to meet the standard provided it meets the following criteria:

- The lifeguard can scan the Zone of Protection® area in its entirety - in the absence of ancillary devices - and recognize a Guest in Distress in the Zone of Protection® area, within a 10 second period of time.
- The lifeguard can contact and render assistance to the Guest in Distress within 20 seconds of recognition.

Lifeguard protected lakefronts and other open water swimming areas follow the 10/3 Minute Protection™ Standard. In open-water situations, the standard remains for the lifeguard to identify a distressed swimmer within 10 seconds and to make contact with a responsive swimmer as soon as is practically possible. It is of great benefit to make contact with a distressed swimmer and render aid while that swimmer is still responsive. If a swimmer does become unresponsive, they must be rescued and care must be initiated within 3 minutes of notification/recognition. The 10/3 Minute Protection™ Standard requires that the entire bottom of the Zone in question be searched and a submerged guest located within 3 minutes from lifeguard notification/recognition. Swim zones and techniques employed should be established to meet the 10/3 Minute Protection™ standard.

The 10/20 Protection™ Standard and 10/3 Protection™ Standard give operators flexibility in the assignment of lifeguard station/zones depending on the physical layout of THEIR facility and other factors. However, it is very important that Clients conduct and document actual testing (Vigilance Awareness Training Program® - Zone Validation® system) to verify ALL Zone of Protection® areas meet the 10/20 Protection™ standard and/or 10/3 Minute Protection™ standard.

**AFTER ZONE OF PROTECTION® AREA COVERAGE HAS BEEN ESTABLISHED USING THE 10/20 PROTECTION™ STANDARD AND/OR THE 10/3 PROTECTION™ STANDARD, clients will develop a Zone of Protection® area document for every lifeguard station and for all staffing levels. The Zone of Protection® area documents must be displayed and lifeguards should be able to identify their Zone of Protection® area when on duty. Zone of Protection® area documents should be completed for each staffing level, pool configuration, and programming scenario, and must be documented using the Zone of Protection template located in Client Services “Library” tab, “Client Templates” section.

In addition to the Zone of Protection® area documents, Zone Coverage® diagrams should also be developed (templates found in Client Services can be used, but are not required). Zone Coverage® diagrams show the complete coverage for a pool/attraction, and are a combination of all Zone of Protection® areas for that pool/attraction. Zone Coverage® diagrams will show all of the individual zones that make up the complete coverage for a pool/attraction in one illustration. One Zone Coverage® diagram should be developed for each staffing level.

A Zone of Protection® area/Zone Validation Overview presentation PowerPoint is available in Client Services, under the “Library” tab, “Program Presentations” link, to assist facility operators in the
development of Zone of Protection® area documents, Zone Coverage® diagrams, and Zone Validation® system summary charts. Clients are also encouraged to communicate with their assigned Client Manager for recommendations and assistance as needed.

**Item 2. Lifeguard Zone of Protection® area Policy (MAHC Compliant)**

Lifeguards must be able to clearly see the entire Zone of Protection® area when lifeguarding to meet swimmer protection standards. This includes the entire surface, subsurface, and bottom of the Zone of Protection® area. Open water situations such as beaches and lakefronts are exempt from underwater observation.

- All E&A CARMP Clients should develop and use Lifeguard Zone of Protection® area, Zone of Coverage®, and Zone Validation® System documents.
- The Lifeguard Zone of Protection® area documents must graphically identify each lifeguard zone, programming and staffing levels, as well as the required behavior and equipment needed at the position.
- The Lifeguard Zone Validation® System documents must graphically identify each lifeguard zone, account for various times of day and year, programming and staffing levels, as well as the required behavior and equipment needed at the position.
- The Lifeguard Zone of Protection® areas, Zone of Coverage®, and Zone Validation® System documents will be maintained in the Client’s aquatic facility operating manual. This manual should be available for inspection by E&A auditors at all times.
- Zone of Protection® area documents will be available for lifeguard reference at the facility. E&A recommends the diagrams be posted in the lifeguard office area and/or at all lifeguard stations to clarify protection Zones.
- All on duty lifeguards must be able to identify their Zone of Protection® area. E&A auditors may challenge E&A Licensed lifeguards to identify their Zone of Protection® area during aquatic safety operational audits. Any lifeguard incapable of clearly identifying the coverage area during an aquatic safety operational audit will automatically fail the audit.
- Clients are required to utilize the Zone of Protection® area and Zone Validation® system documentation templates in client services.
- If for any reason the lifeguard discovers an area that cannot be clearly observed to monitor swimmers, it is the primary responsibility of this lifeguard to immediately notify a supervisor to rectify this condition. The aquatic facility manager should take action to allow for all portions of the Zone of Protection® area to be visible to lifeguards including re-validation of the zone.

**Item 3. Lifeguard Rotations and Breaks**

*Policy Statement: E&A recommends that each lifeguard rotate (change position) within a 30-minute time period.*

E&A recommends that lifeguards receive a minimum 1/2-hour break every four (4) hours. This break should be downtime for the lifeguard with no duty assignments. Refer to state labor laws for specific requirements as State and/or local labor law must be followed. E&A also recommends alternation of tasks throughout rotations so that no lifeguard has scanning responsibilities for more than one consecutive hour. Examples of alternative positions include but are not limited to dispatch positions, cleaning positions, inner-tube repair/collection, Gift Shop/Food Service/Guest Service positions, etc.

**Item 4. Open Water Lifeguard Zone of Protection® Areas**

*Policy Statement: In ‘search and locate’ situations, the 10/3 Minute Protection ™ Standard requires that each Zone of Protection® area established is capable of being completely bottom searched so that lifeguard staff can locate a guest and render aid within 3 minutes or less.*
Open water environments such as lakefronts, bay fronts and open water areas must meet the 10/3 Minute Protection® standard and Zone of Protection® areas should be developed accordingly and be clearly defined. Search and Rescue practices will also assist the Client in designing these Zone of Protection® areas. It is imperative that each facility has a documented procedure for conducting a missing person search as part of their EAP and that the procedures take into account minimum staffing levels and the size of the Zone to be searched. Bottom searching areas of open water deeper than 5 feet must implement additional search protocols (mask, fin and snorkel, or scuba) that allow for a complete bottom search in coordination with a net drag within that same 3 minutes.

- Zone of Protection® areas should be clearly defined and delineated using the following combinations: rope and float lines and/or beach flags and water buoys. Additional beach signs may also be used. Guests should not swim outside of these designated swim areas. Each Zone of Protection® area should go through the Open Water Zone Validation® process as detailed in the VAT® section of this Handbook.

- 10/3 protocols should account for minimum staffing periods and the number of individuals your search and recovery practices require in order to be implemented.

- Search and Rescue practices include Net Drag, Mask, Fin and Snorkel swim search, and any other technique as outlined in the ILTP textbook, which meet the 3-minute or less recovery standard. **Human chains using guests is NOT an acceptable form of bottom search.** Non-lifeguard personnel and/or guests should not be a part of search and rescue practices.

- When possible, Net Drags and Mask, Fin and Snorkel (or scuba) searches should be done simultaneously, by two teams of lifeguards.

  *See ILTP Course Textbook for additional information.*

**Item 5. Opening and Closing Procedures**

Clients will utilize Opening and Closing Checklist documents which include operational procedures of Pre-Opening & Post Closure bottom checks to clearly document that all Zone of Protection® areas are clear of any guests prior to opening, and after closing the area. An operational procedure that verifies the bottom of all pools/attractions (by Proactive Bottom Scan) and waterfront areas (by execution of a complete bottom search procedure for waterfronts) have been confirmed “clear” will provide a measure of assurance that an event did not occur during normal operations and protect the owner/operator.

**Item 6. Communication**

It is essential in an open water environment that methods of communication are clear and well understood. This applies to communication with guests as well as communication between facility staff members. Communication devices such as flags, markers, signage, audio spiels, megaphones, etc. that best fit the environment and facility needs can be employed in order to achieve effective communications.

**Flags:** Refer to Chapter 13 ‘Open-Water Lifeguarding’ in the ILTP Lifeguard Textbook for detailed information regarding the use of Flags for communication in the open-water swimming environment.

**Beach to Water Communications:** If the surf is rough and/or a distressed swimmer submerges, the responding lifeguard may lose sight of the guest. Therefore, it is recommended that a set of signals that can be used to assist the in-water lifeguard for communicating from the beach to the water be developed. This set of signals can utilize hand signals, employ small flags, etc.

**Item 7. MISSING GUEST SEARCHES**
If you suspect that a missing guest is submerged in a specific Zone of Protection® area, the entire swim area should be evacuated immediately and search procedures initiated. In **deep water**, the area can be searched using masks, fins and snorkel and/or scuba. In **shallow water**, the net drag technique should be used. The technique used to conduct a missing guest search should be a written part of the facility’s EAP. The requirement, as set forth in the 10/3 Minute Protection™ standard, is to completely search the defined zone, locate the distressed guest, and begin administering care within 3 minutes. Simply stated, each Lifeguard Zone of Protection® area within an open water swimming area (there can be multiple zones in each swim area corresponding to each lifeguards’ responsibility) must be designed to allow for complete search and recovery within 3 minutes. Other considerations include:

- The number of staff available to conduct a search: Focus on the least common denominator of staff. For example, are there times when only 2 guards will be on duty? If so, the zone size should allow for complete bottom search by those two guards to meet the standard.

- Each zone should be clearly delineated for each guard; one large swim area with multiple guards posted will not allow for the entire zone to be searched within 3 minutes. Consider delineating one zone for each lifeguard position/stand and validate that each individual zone can meet the search and recovery standard of 3 minutes.

- In low attendance periods, you can close certain zones and enforce swimming only in the lifeguarded zones as opposed to a larger swim area.

**Mask, Fin, and Snorkel swim search. (Conducted in Deep Water)** This type of search is conducted by a team of rescuers, each equipped with mask, fins and snorkels, performing a coordinated series of surface dives. Refer to Chapter 13 ‘Open-Water Lifeguarding’ in the ILTP Lifeguard Textbook for detailed information regarding the use of Mask, Fin, and Snorkel swim search specifics.

**Net Drag System. (Conducted in Shallow Water)** The net drag system allows for minimal rescuers to facilitate a bottom search in an effective and time saving manner. Refer to Chapter 13 ‘Open-Water Lifeguarding’ in the ILTP Lifeguard Textbook for detailed information regarding the use of Net Drag Systems for use in a Shallow Water search.

**Design/Construction of a Net Drag system:** Use a durable volleyball net or something similar, adding PVC piping on either end to allow for the net to be held and moved through the water. Invert the net and stretch it out to the desired length, then zip-tie extra net to the PVC poles on either end. While the net is upright, wind in and out along its entire length a line of float/buoys through the top (this will actually be the bottom of the actual volleyball net or in other words, the portion of the net without the cable line running through). This keeps it floating near surface when inverted. Attach enough weights along bottom of net (actually the top of the volleyball net where the cable runs through) to keep it at the bottom when being dragged. Store the net in an easily accessible location near open water environment. It is recommended that you do not roll the net up, but rather fold the net so it can be easily undone with minimal tangling in the event of an emergency.

*See Chapter 13 in the ILTP Course Textbook for additional information*

**Item 8. Emergency Action Plan (EAP) Operating Standards**

Backboards, Supplemental Oxygen Support Systems, and AEDs must be available and located within the facility to correspond with documented levels of response to meet EAP Operating Standards for delivery of equipment and related care.

**RECOMMENDATION:** All emergency response equipment should be on site of the emergency and ready for use in all incidents - including O₂ and AED.
Your EAP will be unique to your facility, and should include a clear, concise description of responsibilities of staff members for various classifications of emergencies at your facility (Responsive, Unresponsive, Suspected spinal, life threatening, non-life threatening, etc.). Refer to the ILTP lifeguard textbook for additional information on developing your EAP. Your plan should be maintained on-site and reviewed annually as well as after an emergency event. Pre-service, site-specific and In-Service training incorporating this plan should occur prior to and throughout the operating season.

The EAP should clearly identify:

- Defined levels of response and the person(s)/position(s)/title(s) responsible for each level of response and action. i.e. primary, secondary & tertiary
- Defined responsibilities and tasks such as equipment, communication and support assigned to the individuals identified in each level of response.

a. Extracection Operational Standard

Use of a backboard to facilitate patient extrication is the training and operation standard. Use of the backboard for rapid extrication is safe and effective for most guests though small children may be able to be safely extricated without the use of a backboard. Guest extrication should be facilitated and accomplished within one (1) minute of initial contact with an unresponsive guest.

b. Supplemental Oxygen Support System Operational Standard

The Supplemental Oxygen Support unit, BVM (Bag Valve Mask), Non-Rebreather Masks, V-Vac (Manual Suction Unit), Pulse Oximeter and Oxygen adapter / oxygen port on mouth piece should be in place and operating efficiently within one (1) minute from the time of patient extraction from the water.

c. AED Operational Standard

An AED should be in place and ready for initiation within two (2) minutes from the time of extrication.

NOTE: Guest extrication is achieved when the guest is removed from the water and located on a solid surface in excess of six feet from the water and deemed appropriate for the safe use of an AED. This policy is designed to coincide with the use of supplemental emergency oxygen for clients participating in the CARMP provided by E&A.

d. Suspected Spinal Injury Patient Care

Use of a backboard to facilitate patient extrication is the training and operation standard. Guest extrication will be facilitated and accomplished within three (3) minutes of initial contact with a guest having a suspected neck or back injury.

Backboards must be available and located within the facility to correspond with documented levels of response at your facility to meet EAP Operating Standards for delivery of equipment and related care. Backboards shall include a minimum of three (3) body straps and a head immobilizer system to secure a guest to the backboard to facilitate a safe extrication, in accordance with the ILTP Lifeguard Program.

Item 9. Additional Guest Protection Standards

Single Lifeguard Facilities/Program Periods

Policy Statement: E&A CARMP Client facilities are accountable for maintaining all EAP Operating Standards at all times, including extrication of unresponsive guests and suspected spinal injury guests, and implementation of Supplemental Oxygen support and AED**.
In the absence of multiple trained E&A Licensed lifeguards to respond in accordance with the facilities EAP, **Supplemental Responders** capable of providing, at a minimum, CPR/AED care and deck extrication skills for both unresponsive and suspected neck and back injury guests, must be trained, staffed, scheduled and in-serviced to act as a “Lifeguard” from an on-deck perspective. See “CARMP Handbook Resources” section, Single Lifeguard - Supplemental Responder Standard - CARMP Handbook Supplement” at E&A Client Services “Library” tab for complete details.

E&A recognizes that there may be circumstances when only a single E&A Licensed lifeguard will be on duty. The following guidelines **must** be followed during single lifeguard periods:

- The facility is accountable for maintaining EAP Operating Standards at all times.
- The E&A Licensed lifeguard must have visible means of communication to obtain outside help (i.e. phone, 2 way radios). The lifeguard must be positioned close enough to the means of communication to allow minimal response time in communicating with the Supplemental Responder(s) (activating EAP) and reaching the distressed swimmer within the confines of the 10/20 Protection standard.
- The lifeguard must initiate a minimum 10-minute break every hour. This will be accomplished by clearing the pool (no exceptions) and checking the bottom (proactive bottom scan, including documentation), accompanied by a change of position. Clients must also be aware of, and follow, any additional labor laws that apply to your lifeguarding staff in providing rest breaks.
- It is recommended that a responsible adult (16 years of age or older) be asked to keep patrons from re-entering the water if the lifeguard needs to leave the pool area during the 10 minute per hour break, and/or the pool area be cleared of all guests/members.

E&A facilities utilizing **Supplemental Responders** are required to follow the outlined requirements:

- Supplemental Responder will receive a minimum of Healthcare Provider level CPR/AED certification and Water Safety Plus Certification training for extrication and care of an unresponsive and suspected neck/back-injured guest. An additional level of training includes the ILTP Course Completion Training. Clients must maintain Training Record Documentation for all Supplemental Responders including names, dates of training, types of training, and copies of all current certifications on-site and available for Auditor review.
- In-Service Training will be conducted that includes E&A licensed Lifeguard(s) and all Supplemental Responders. Training should allow for all skill sets to be maintained to test-ready performance levels and should include scenario based EAP practice. In-Service Training should be conducted as frequently as needed for Supplemental Responders to maintain emergency response skills to “test ready” levels. Scenario based EAP Practice should be conducted to reflect real positions, communication, response, equipment facilitation, and team management of unresponsive and suspected spinal events.
- Supplemental Responders will be required to participate in EAP scenarios conducted during Unannounced Aquatic Facility Operational Audits. Be prepared to make these Supplemental Responders available for the audits. Supplemental Responders will be held accountable to the same standards as E&A Licensed Lifeguard in respect to delivery of AR/CPR/FBAO, AED skills, and team management coordination.

**Personal Flotation Devices (Lifejackets)**

U.S. Coast Guard approved or equivalent type lifejackets must be made available for use at all E&A CARMP client facilities. Client facilities should provide appropriate numbers of lifejackets and sizes to accommodate the demand. Lifejacket access should be “free and available” to guests. Clients should also consider ways to manage proper disinfection/cleaning and proper fitting training/techniques of the lifejackets maintained on-site.
Slide Dispatch Personnel on Towers

E&A Policy: EAP Operating Standards must be implemented within two (2) minutes of EAP activation to any slide tower or play structure where guests are permitted.

E&A recommends that personnel used at the top of slide towers as dispatchers, be E&A Licensed lifeguards. However, if they are not lifeguard trained, then they should be CPR, AED, and First Aid Certified with credentials available for inspection. They should also be identifiable as a staff member, but not as a lifeguard and must possess a means of communication by which they can activate the EAP and properly communicate safe dispatch intervals.

a. Hot Tub Swimmer Protection/Restriction Standard

Policy Statement: Clients will provide direct lifeguard protection and supervision (10/20 Protection Standard and EAP Operating Standards) during all hours of operation or they will comply with all of the following unless applicable code requires direct supervision by a Lifeguard:

- Enclose the hot tub/spa area with a fence of a minimum height of forty-two inches (42”).
- Equip the fence with a gate that has a self-closing, self-latching security device to prevent unauthorized access. Self-latching mechanism must be a minimum of 52” above ground level.

It is further recommended that clients carefully review other applicable state and local laws and regulations that must be followed in operating your spa or hot tub.

b. Protection for Rentals, Special Events, Programming Periods (MAHC Compliant)

E&A recommends that all CARMP clients provide E&A Licensed Lifeguard protection for all pool rentals, special events, and other water activities at your facility. Programming activities such as swim lessons or swim team, regardless of group rental status, must follow CARMP swimmer protection and Aquatic EAP standards set forth in this handbook.

- If you choose not to provide E&A Licensed Lifeguards at said rental/group events, then the event is considered to be outside of the scope of service outlined in the Jeff Ellis & Associates, Inc. Consulting Agreement and any and all issues arising out of the event are the sole and exclusive responsibility of the client.

Check your insurance carrier policies, state code, and all applicable laws, which may specifically exclude a “transfer of duty” to provide lifeguards and the standard of care prescribed. It is recommended that the facility provide E&A Licensed Lifeguards and maintain all Aquatic EAP standards of care, at all times (as outlined in this CARMP Handbook), as allowing a rental group to provide lifeguards and standard of care may not exclude the facility from liability arising from a rental period. A hold harmless or indemnification may be void if your state code or Insurance policy does not allow for transfer of duty and/or care.

IMPORTANT NOTE: It is recommended that clients work with their corporate attorney to develop a rental or related agreement that will fully protect your organization. If you chose to allow lifeguard protection other than E&A Licensed lifeguards at anytime, Jeff Ellis & Associates, Inc. will not be able to support any actions/events that may occur.
**Item 10. Proactive Standards**

**a. Proactive Bottom Scan Protocol**

- Every time a lifeguard is **ACCEPTING** responsibility for a Zone of Protection® area, the lifeguard's first duty is to visually confirm the entire zone is clear. This practice must occur every time a lifeguard assumes Zone of Protection® area responsibility. It should be clear to any observer that the lifeguard is making a visible, diligent and profound effort to accomplish this objective every time a Zone of Protection® area is transferred to another lifeguard.

- When **RELINQUISHING** responsibility for a Zone of Protection® area, the exiting lifeguard's duty is to visually confirm the bottom of the zone is clear. This practice must be achieved every time a lifeguard transfers Zone of Protection® area coverage to another lifeguard. It should be clear to any observer that the lifeguard is making a visible diligent and profound effort to accomplish this objective every time a Zone of Protection® area is transferred to another lifeguard.

- When lifeguarding a Zone of Protection® area, the lifeguard must be able to clearly see swimmers in the entire protection area. This includes surface, underwater and bottom of the protection zone. If for any reason the lifeguard discovers an area that cannot be clearly observed to monitor swimmers, it is the primary responsibility of the lifeguard to immediately rectify this condition and notify supervisory staff. Supervisory personnel must take action to rectify conditions that prevent proactive lifeguarding, including re-validation of the zone.

**When lifeguarding a Zone of Protection® area, all levels (including surface, underwater, and bottom) will be protected according to the 10/20 Protection™ standard. It should be clear to any observer that the lifeguard is making a visible, diligent, and profound effort to consistently accomplish this objective at all times the lifeguard is responsible for a protection zone.**

**b. Vigilance Awareness Training® (VAT®)**

The primary goal of the VAT® program is to increase awareness and conditioning of lifeguards who work at Ellis & Associates client facilities. Additional benefits of this Aquatic Risk Management Tool are found in initial lifeguard training, In-Service Training and Lifeguard Zone Validation. The VAT® Program is comprised of four (4) core elements:

- Introduction of the manikin during initial lifeguard training course(s)
- Use of manikins during In-Service/Pre-Season and Pre-Employment Training at the client facility
- Use of manikins to Validate Lifeguard Zones of Protection® areas
- Use of manikins/live drills during facility operation to simulate real life situations and realities of lifeguarding.

Many factors can contribute to a lifeguard’s inability to identify or recognize a guest in distress on the bottom, including environmental factors (glare, reflection, refraction), physical characteristics (water surface disturbance, guests in the water, tubes/inflatables, other structures, pool configuration), and the general lack or ineffectiveness of training for visual scanning. This is evident from the results of the past surveys with manikins on the pool bottom. Ellis & Associates has created, implemented and mandated this Aquatic Risk Management Tool, known as **Vigilance Awareness Training®**, in line with our E&A Mission statement to eliminate loss of life due to drowning.
**Item 11. VAT® Program Standards and Requirements (MAHC Compliant)**

**a. Implementation**

All E&A CARMP Client Facilities are required to implement the VAT® Program utilizing all 4 Core Components and the Operational Manikin Drop/Live Active Guest Drills. See “Vigilance Awareness Training Program - CARMP Handbook Supplement” Document in Client Services “Library” tab, “CARMP Handbook Resources” section for a more detailed overview of VAT® Program.

**b. Operational Manikin Drop (OMD) and Operational Live Active Guest Drills**

E&A CARMP clients are required to execute a minimum of 8 (eight) Operational Manikin Drops (OMD) and at least 4 Operational Live Active Guest Drills (LAG) at each facility operated by the client per month of operation. If your staff level falls below 12 at the facility, each lifeguard should, at a minimum, be subject to one (1) OMD or LAG Drill per month.

**c. Documentation**

Documentation for the VAT® Program must to be maintained and available on-site as outlined below:

- **Operational Manikin Drops (OMD) and Operational Live Active Guest Drills:**
  
  Operational Manikin Drop and Live Active Guest Drill documentation log should include date/time, location of the drill, outcome of the drill, remediation date, re-drill date, re-drill outcome.

  See “VAT OMD and Live Active Drill-Individual Evaluation”, in the “Client Templates” section under the “Library” of Client Services.

**d. Open Water Facilities and VAT® Requirements**

CARMP Clients, who operate open water facilities, are required to execute a minimum of four (4) Live Active Guest Drills per month. For Zone Validation®, Open Water facilities must complete and document a 3-minute search and rescue drill for each Zone of Protection® area prior to the beginning of the season/year, and periodically during the season/year to confirm that each Zone of Protection® area is in compliance with the 10/3 Protection™ standard. This should be completed for each staffing level, programming period, and configuration of the Open Water Facility. If the drill is not successful, issues found must be immediately corrected and a new drill must be successfully performed and documented. If weather or other circumstances result in a change of water depth or size of the swimming area, each Zone of Protection® area should be revalidated following the aforementioned procedure. Documentation of the Zone Validation® Process must be completed using the Open Water Zone Validation® client template available in Client Services under the “Library” tab in the “Client Templates” section. Applications of the other VAT® requirements are identical to pool and waterpark facilities.

**e. Zone Validation® System**

Zone Validation® System documentation must be completed for each attraction and for each staffing level for said attraction. The “Zone Validation®” template must be used to document validation for each Zone of Protection® area. A graphical depiction of each zone, at all staffing levels for each attraction should show locations of every manikin position in the zone and written or video validation of lifeguards’ confirmation that the manikin was visible from the lifeguard station at every position shown. Zone Validation® System documentation should show manikin placement along all extremes of each Zone of Protection® area, as well as, locations within the zone proper. Zone Validation® System documentation should not show any ‘blind spots” or “difficult to see areas” as the purpose of this process is to validate zones in the absence of any occlusions to the lifeguards ability to view the entire bottom of the established Zone of Protection.
See Client Services, “Library” tab, “Client Templates” section, - “Zone Validation®” template or “Open Water Zone Validation” template.

f. VAT® Remediation Program

Remediation programs should document the process that occurs following a drill that does not meet standards, including the step-by-step process the lifeguard will participate in following an unsuccessful drill. The Remediation Plan should clearly document the content of remediation training, the length of time of remediation training, the remediation trainer, successful completion of remediation, and should identify a time frame for re-drill of the lifeguard. The remediation process should include subsequent and progressive stages for remediation if the lifeguard must repeat the process. It is recommended that you work with your Human Resource Department to create a formal process that is clearly communicated to all lifeguards.


g. Guest Education

Guest education is critical to the success of the VAT® Program. Consider signage, periodic announcements, and/or prominent placement and awareness of the manikins used in the program.

See “VAT® E-Learning” available in Client Services for additional details.

h. Supervision during Operational Manikin Drops and Live Active Guest Drills

During Operational Manikin Drops and Live Active Guest Drills, it is necessary to station someone with the manikin or nearby an active guest who is responsible for managing the scene while the drill is running.

i. Zone Protection Continuity

The lifeguard being evaluated is expected to enter the water upon identification of the manikin or Live Guest. Accordingly, there must be back-up coverage of the zone by a relieving lifeguard.

j. On-Site Manikin/Stimulus

A submersible manikin or silhouette should be present or available at all E&A Client facilities and available for use as part of the Aquatic Facility Operational Audit.

k. In-service Training Use of Manikins

VAT® Training should be incorporated into in-service training with appropriate documentation.

l. Auditing Parameters

VAT® Drill

- At the completion of the observational audits, the auditor will request that the Client execute an OMD, a LAG Drill, and/or a 10/3 Drill. This should be conducted in the same manner/procedure, which the facility utilizes on a regular basis. VAT® drills will be included in the observational portion of the audit.
**Item 12. Frequent change while lifeguarding**

**a. Strategies to help minimize lifeguard fatigue**

As discussed in the ILTP textbook, environmental factors can contribute to fatigue and it is important to take steps to keep lifeguards hydrated, cool, and protected from the sun. In addition to environmental fatigue, mental fatigue can result in reduced vigilance. To help fight fatigue, create a means for lifeguards to make the following changes while on duty:

- **Change scanning pattern** – Have lifeguards switch between several predetermined patterns while always including downward head & eye movement.
- **Change body position** – Within the confines of what is allowed at your Zone of Protection® area, have lifeguards change between sitting, standing, and roving positions.

Review chapter 2 in the ILTP textbook for additional information.

**Item 13. Other Policies**

**a. Aquatic Facility or Attractions Inspections**

Aquatic Facility or Attraction Inspections are performed to identify and document any physical hazards or operational safety issues that require attention by the client. A written and video/photographic record will be given to the client to address any safety issues noted during the inspection.

1. **As a new CARMP client,** an authorized representative of E&A will complete an Aquatic Facility Inspection.
2. **If you are a continuing CARMP client,** E&A recommends that you request an authorized representative of E&A to complete an Aquatic Facility or Attraction Inspection prior to opening any new or additional aquatic features or attractions to the public.
3. **If you are a continuing CARMP client,** have previously had an inspection and are not opening any new or additional features, you will receive an additional inspection *only if you request one.*
4. It is the sole responsibility of the client to correct hazards identified in the Aquatic Facility Inspection.

**b. Requesting a Policy/Procedure Variance**

If your facility presents a unique aquatic safety situation that may conflict with an existing E&A policy or procedure, you may submit a written variance request to your designated Client Manager. *Previously submitted and approved variances do NOT need to be resubmitted annually.*

Variance requests will be reviewed on the basis of the facility’s ability to present an alternate manner in which to meet or exceed the standard for which they seek to have a variance. You will be provided with written notice of acceptance or denial of your request for a variance.

**c. Signs and Depth Markers**

Signs shall be placed to convey messages, information, and warnings to guests in such a manner that guests can respond with the appropriate action prior to commitment to enter a pool or attraction against the advice of the sign.
Depth Markers should be plainly and conspicuously marked at or above the waterline on the vertical pool wall and on the top coping or edge of the deck or walk next to the pool or meet local/state code. Clients are responsible for complying with state pool codes and other regulations that require warning signs, markers, and other informational signage.

d. Pool or Attraction Closures

Should it become necessary to close a pool or attraction because of turbidity, health concerns, lifeguard shortages, or any other reason, the client must take precautions to prevent unauthorized entry into these areas or provide Zone Coverage sufficient to meet the Zone Validation standards.
Section F: Aquatic Facility Operational Audits

Item 1. Unannounced Aquatic Safety Operational Audits

Big Picture Objective: Unannounced Aquatic Safety Operational Audits are designed to identify potential risk exposures BEFORE they become catastrophic.

Unannounced Aquatic Safety Operational Audits provide E&A CARMP Clients with important validation and documentation of the professional standard of care they provide their guests and lifeguards. As a CARMP client, you should anticipate receiving three (3) audits for seasonal clients, and up to four (4) audits for year round clients, each operating season. You will find the number of audits you may anticipate listed on your annual Client Status Notification Form.

IMPORTANT NOTE: Facilities that terminate operations prior to the schedules provided in the Facility Information area in Client Services, MUST contact their E&A Client Manager. If a scheduled audit has not been completed and the auditor arrives to complete said audit, the client will be billed for the service unless the closure has been previously communicated. The effects of weather, travel problems, and related factors can impact the best-laid auditing plans. Please contact your E&A Client Manager if you have questions concerning your audits.

a. Preparing for Unannounced Aquatic Facility Operational Audits

Tips to make the audits work to your advantage!

- Review with your lifeguards and aquatic safety personnel the purposes and goals of audits. Let them know that auditors want to "catch them" in a positive, supportive way! The auditors want to catch lifeguards doing their jobs--preventing drowning.
- Each facility should have a plan to address who will work with the auditor and facilitate the audit. This person should be a supervisor or manager who has the authority to provide access to administrative records and who is familiar with the audit process and its requirements.
- Aquatic Facility Operational Audits are designed to document lifeguards enhancing guest protection by proactively implementing the 10/20 Protection™ standard and/or 10/3 Protection™ standard through scanning and vigilance, and maintaining their rescue and basic life support skills at "test ready" levels.
- Include "practice audits" in your in-service training. Video recording these sessions may help prepare your lifeguards for the unannounced audit. You'll find your lifeguards less self-conscious and more confident.
- Use the audits as an opportunity to show your guests that your professional lifeguard staff is “rescue ready.” Make a public announcement that you will be holding a simulated emergency training exercise. Watch the crowds gather and applaud your lifeguards’ performance. The public relations and lifeguard confidence benefits can be great.
- Prepare a plan to meet with the auditor when they announce their presence. The audit is designed to meet client needs. As such, your active participation in the audit process remains critical. Auditors are available to answer your questions, discuss the audit results, get in the water and in-service skills for audit performance, address other related issues, and above all else - meet your needs.
- Plan to review the audit with your aquatic team to accentuate the positive outcomes and prepare a plan of action to address any items that require attention.
b. Audit Components

Specific Audit Criteria will be posted in the Client Services in the Spring of each year. The unannounced Aquatic Facility Operational Audit is broken down into the three (3) sections.

Section One: Individual Lifeguard Performance

1. 10/20 Protection™ standard and Rescue Ready Evaluation
2. Professionalism and identifiably
3. Environmental Protection
4. VAT® OMD and Live Active Guest drills
5. Supervisory Observation
6. Waterslide Dispatch Operator (WSDO) Evaluation (optional, as requested by Client)

Section Two: Lifeguard Management of a Simulated Emergency

1. Simulated Emergency scenarios designed to validate the facility’s ability to implement the Emergency Action Plan Operating Standards for Unresponsive Guests in Distress and/or patients with Suspected Neck and/or Back injuries.
2. Individual Skills: Active Guest, First Aid, and/or CPR skills will be tested in this section to validate individual lifeguard “test ready” skills.

Section Three: Facility, Supervisor, and Administrative Evaluation

1. Basic Facility Inspection
2. Supervisory Evaluation
3. Administrative Evaluation

NOTE: Aquatic Safety Operational Audit footage and the corresponding report will be provided to the Client on a USB Drive. Maintain the USB on-site and have available as part of the normal audit procedures to use in subsequent audits for each calendar year. A $20 replacement fee will be invoiced in the event of a lost or unavailable USB drive.

c. Auditing One Lifeguard Facilities

To maintain the purpose and intent of the Aquatic Safety Operational Audit, scenarios may occur at any time during the hour (not just during the break).

When asked, the lifeguard must clear the pool and proceed with the scenario.

The emergency action plan must demonstrate outside communication and assistance to meet all EAP Operating Standards. Supplemental Responders identified in the EAP will be required to participate in the audit.

d. Audit Failures

• If a Client Facility fails an audit, the Client will be placed on probationary status. When corrections are implemented and documented, client status will be reinstated.
• If an E&A Licensed lifeguard should fail an Observational Evaluation, the individual's lifeguard license is immediately suspended. Depending on the nature of the failure, a suspended license may be reinstated after in-service training or review of specific skills conducted by any authorized ILTP Lifeguard Instructor. The instructor conducting the retraining must document in writing that the failed skills have been performed at test ready levels to their satisfaction and said documentation must be kept with the Lifeguard license. During the time of suspension, the lifeguard will not be allowed to perform lifeguard duties. The individual can, however, be moved to non-lifeguard position such as cashier, concession, maintenance, etc. There is no specific time frame for reinstatement.
• Any client failing an Unannounced Aquatic Facility Operational Audit will be subject to re-auditing within 21 days. **The follow-up audit will be billed and must be paid for by the client at the rate outlined in the CSN.** The client will also lose preferred client status following an audit failure. Should the re-audit be failed, client participation in the CARMP may be terminated.

**e. When the Audit is Complete**

• Share with the entire staff the information and results of the Unannounced Aquatic Safety Operational Audit. Timely review of the audit confirms that your staff is performing its duties and gives recognition and encouragement.

• Respond to any items that received a “Rectify” or “Fails” evaluation directly with your Regional Client Manager.

• If you disagree with any findings in the audit report, you may request an audit review. Requests for a review must be submitted in writing to your Client Manager within 20 days of receiving the audit report. The audit reviewer will view the entire audit video (not just the questioned portion), re-score the audit, and report the results. Your new score may be higher or lower than the initial audit.

• **What do you do with your Audit Report?**
  
  Do you review the Audit report with your staff, including the video? Do you review the report with upper management/owner? Do you identify the areas noted for improvement and make written or video documentation of the improvements or changes made? Do you follow up with areas marked “Rectify” on the report and document the follow up to correct that area of concern? Sound risk management principles, as mentioned above, are based on showing a trend for improvement; after all, an identified risk exposure that is not corrected is a liability. Use the video during in-service to show positive and negative behavior or performance, as both facilitate learning when properly presented. Do not use it to embarrass, but rather to learn from errors so that the situation does not repeat itself. We all focus on the Overall Audit score as a barometer of success, however, there are many individual successes in every audit - Celebrate them on a regular basis and use them to motivate even in the face of an Overall Audit score that is less than your expectations.

**f. Impersonating an Auditor or Instructor**

No individual employed by a client facility may impersonate, through word or action, an auditor or lifeguard instructor. Anyone shown to be impersonating an auditor or lifeguard instructor is subject to having all E&A authorizations and licenses revoked permanently. Please notify your Client Manager immediately of this offense should it occur at any of your facilities.