Checklist
Swimming Pool Safety

Costly claims can arise from unsafe swimming pool operations at educational institutions. United Educators (UE) and its members have spent more than $8 million since 2010 to defend claims from accidents in and around pools. The most common include:

- Drownings and near drownings due to inexperienced swimmers, distracted lifeguards, and underwater breath-holding. The four most expensive claims were drownings, each costing UE and its member institutions more than $1 million.

- Head injuries and broken bones from incorrect usage of diving boards, pool equipment, ladders, or improper supervision of pool patrons.

- Lacerations caused by broken tiles, sharp objects in the pool or surrounding area, and poorly installed grates and filters.

- Slip and fall cases caused by water on pool decks, walkways, and in locker rooms.

- Burns, rashes, and respiratory illnesses from incorrect use of pool chemicals.

This checklist provides an overview of pool safety considerations, especially in supervision and operation. It is intended for institutions that own or operate pools, individual pool operators and supervisors, and athletic administrators and coaches. For each question, check the appropriate “yes” or “no” box. Review any box checked “no” to determine whether the suggested practice is possible. Use the “actions needed” box to identify any follow-up actions.

This publication is not a compliance guide. Institutions should be aware of state and federal laws and guidelines that impose safety and accessibility requirements on pool owners and operators, such as:

- **Virginia Graeme Baker Pool and Spa Safety Act (VGB).** This federal statute took effect in 2008. The law requires anti-entrapment drain covers and other safety devices at all public pools and spas. Some pools at educational institutions may qualify as public pools under the statute’s definition.

- **Americans with Disabilities Act (ADA).** In 2012, the Department of Justice updated its standards, setting minimum construction and design requirements for making pools and spas accessible to people with disabilities. These standards may apply to pools at some educational institutions.

- **Model Aquatic Health Code (MAHC).** The Centers for Disease Control and Prevention worked with public health representatives to publish the MAHC in 2014. The MAHC guidance serves as a model for local and state agencies that update or implement swimming pool rules, regulations, guidance, laws, or standards. While the MAHC is not a controlling authority, UE expects it to be adopted in whole or in part by some jurisdictions and become a standard of care.

In this checklist, “swimming pool” and “aquatic facility” are used interchangeably.
### Policies and Management

#### A. Lifeguards

Whether your institution is required to hire lifeguards for your aquatic facility varies widely by state and local law. In some jurisdictions, lifeguards are optional for pools considered public facilities or pools with signs warning that lifeguards are not on duty. UE urges members to place certified lifeguards on the pool deck whenever the pool is in use. That staffing decision may be left to the institution, but it should be informed by legal and regulatory requirements.

#### Qualifications

- Do your lifeguard qualifications comply with local and state laws? □ Yes □ No

- Are lifeguards required to:
  - Be at least 16 years old? □ Yes □ No
  - Maintain a current lifeguarding certification from a nationally recognized agency or equivalent, such as:
    - American Red Cross? □ Yes □ No
    - YMCA? □ Yes □ No
    - StarGuard? □ Yes □ No
    - Ellis & Associates? □ Yes □ No

- Maintain certification in life-saving skills, such as:
  - Cardiopulmonary resuscitation (CPR)? □ Yes □ No
  - First aid? □ Yes □ No
  - Automated external defibrillator (AED) use? □ Yes □ No
  - Emergency oxygen administration? □ Yes □ No

#### Responsibilities

- Are the following responsibilities listed in the lifeguard position description:
  - Monitor swimmers within a defined zone? □ Yes □ No
  - Enforce facility rules? □ Yes □ No
  - Respond to emergencies? □ Yes □ No
  - Wear an identifying uniform? □ Yes □ No
Actions Needed

**Wear sunscreen if stationed outdoors?**
- Yes
- No

**Know where personal protective equipment is located and how to use it?**
- Yes
- No

**Does your facility conduct regular, unannounced tests of lifeguard?**

- Rescue skills by:
  - Using “dummy drops,” in which mannequins are dropped to the bottom of the pool, to gauge emergency response time?
    - Yes
    - No
  - Recovering and moving a dummy, mannequin, or simulated victim to a position of safety?
    - Yes
    - No
  - Testing resuscitation skills?
    - Yes
    - No

- Knowledge of facility procedures listed in further detail below, such as:
  - Response to bodily fluids?
    - Yes
    - No
  - Inclement weather plan?
    - Yes
    - No
  - Proper storage and use of pool chemicals?
    - Yes
    - No

**Does your facility promote lifeguard communication by furnishing:**

- Whistles?
  - Yes
  - No

- Flags?
  - Yes
  - No

- Hand signals?
  - Yes
  - No

- Bullhorns?
  - Yes
  - No

- Walkie-talkies?
  - Yes
  - No

Vigilance

**Are lifeguards on surveillance duty prohibited from engaging in activities that distract them from their responsibilities, such as:**

- Coaching?
  - Yes
  - No

- Pool maintenance?
  - Yes
  - No

- Interacting with patrons at concession stand or ticket window?
  - Yes
  - No

- Socializing?
  - Yes
  - No

- Reading or studying?
  - Yes
  - No

- Using personal electronics or cell phones?
  - Yes
  - No
To reduce lifeguard fatigue, does your aquatic facility require lifeguards to:

- Make a major change in posture every five minutes, from sitting to standing to strolling? □ Yes □ No

- Rotate monitoring positions, for example from guard chair to pool deck, every 15 to 20 minutes to prevent boredom? □ Yes □ No

- Take a break from surveillance every one to two hours? □ Yes □ No

Staffing

There is no universal lifeguard-to-swimmer ratio. The required number of lifeguards is based on local requirements, facility type and design, and number of swimmers and patrons using the aquatic facility.

- Do you:
  - Require at least two lifeguards on duty at all times—one to respond to an emergency and the second to assist the primary rescuer by calling 911 and clearing the swimming pool? □ Yes □ No
  
  - Determine the correct number of lifeguards present by considering industry standards, such as:
    - One lifeguard for every 25 to 50 swimmers? □ Yes □ No
    - One lifeguard for every 2,000 square feet of water surface area? □ Yes □ No
    - Multiple lifeguards for areas of high risk, including diving wells and pools that create waves or rough water? □ Yes □ No
    - Enough lifeguards that each can spot a swimmer in distress within 10 seconds and reach the furthest edge of his or her assigned surveillance zone within 20 seconds? □ Yes □ No

Positioning

- Does your facility determine lifeguard monitoring positions, such as standing or strolling on the pool deck or sitting in a guard chair, by considering:
  - Whether each position will limit distractions from swimming pool patrons? □ Yes □ No
  
  - The presence of sight obstructions or water glare? □ Yes □ No
  
  - A lifeguard’s ability to respond quickly and safely to an emergency? □ Yes □ No

- Have you determined if elevated lifeguard chairs are required by state law? □ Yes □ No

- Does your aquatic facility include both roving and seated lifeguards? □ Yes □ No
B. Pool Operators

Pool operators are individuals who have received training on the basic knowledge, techniques, and skills of pool operations and management. Many state and local health departments require the individual to complete a pool operator certification program before being called a certified pool operator. Pool operators may be employees of the institution or contractors. Whether your institution is required to hire pool operators varies widely by state and local law.

Qualifications

- Are pool operators:
  - On-site or immediately available to supervise aquatic facilities and lifeguards? □ Yes □ No
  - Qualified according to local and state laws? □ Yes □ No
  - Required to maintain a current certification from a nationally recognized agency or equivalent, such as:
    - Certified Pool Operator from the National Swimming Pool Foundation? □ Yes □ No
    - Aquatic Facility Operator from the National Recreation and Park Association? □ Yes □ No

Responsibilities

- Are the following tasks listed in the pool operator position description:
  - Identifying and communicating health and safety hazards to administrators? □ Yes □ No
  - Supervising lifeguards and other pool employees? □ Yes □ No
  - Testing, recording, and adjusting water quality as needed? □ Yes □ No
  - Understanding general maintenance procedures? □ Yes □ No
  - Responding to emergencies and knowing when the aquatic facility should be closed? □ Yes □ No
  - Conducting staff training? □ Yes □ No
C. Staff Training

- Do all employees participate in periodic in-service training to maintain skills?  □ Yes □ No

- Is in-service training:
  - Conducted at a frequency that complies with state and local law, which ranges from four hours a month to once a year?  □ Yes □ No
  
  - Documented, including verification of:
    - Names of attendees?  □ Yes □ No
    - Delivery of training, whether through written exams or real-life rescue skills?  □ Yes □ No
    - Date of training?  □ Yes □ No
    - Name of trainer?  □ Yes □ No
  
  - Used to confirm lifeguard certifications have not expired?  □ Yes □ No

- Is the documentation of in-service training retained in accordance with your records retention policy and state and local law?  □ Yes □ No

D. Minimum Abilities of Patrons

- Are minimum swimming abilities:
  - Required for swimmers to use the pool without an adult in arm's reach?  □ Yes □ No
  
  - Established by considering industry standards, such as:
    - A shallow water swim test, for example the YMCA shallow water test that requires:
      - All children under age 8 or anyone under 4 feet tall to maintain upright balance in the water up to 4 feet?  □ Yes □ No
      - Swimmers age 8 and older or those taller than 4 feet must be able to walk or swim in up to 4 feet of water with ease?  □ Yes □ No
    
    - A deep water swim test, for example the YMCA deep water test that requires:
      - Swimming the length of the pool freestyle with face in the water without touching the bottom or side of the pool?  □ Yes □ No
      - Treading water for one minute without touching the bottom or the side of the pool?  □ Yes □ No
If no minimum swimming abilities are established:
- Do patrons use properly fitted, U.S. Coast Guard standard personal flotation devices? □ Yes □ No
- Do children under 8 years old who wear personal flotation devices stay within an arm’s reach of adults in the water? □ Yes □ No

E. Emergency Planning

Have you created and implemented a safety plan that includes:

- An emergency action plan that addresses:
  - Types of emergencies and imminent health hazards your facility is likely to encounter, such as:
    - Response to bodily fluids? (See below) □ Yes □ No
    - Inclement weather plan? (See below) □ Yes □ No
    - Proper storage and use of pool chemicals? (See below) □ Yes □ No
  - Methods of communication between responders, emergency services, and pool patrons? □ Yes □ No
  - Anticipated responders for these emergencies? □ Yes □ No
  - Responsibilities of each responder? □ Yes □ No
  - Requirements for emergency closure of your facility? □ Yes □ No
  - When the emergency action plan will be reviewed, rehearsed, and updated? □ Yes □ No
  - A list of available safety equipment for each emergency task, such as:
    - Rescue tubes? □ Yes □ No
    - Backboard with head immobilizer and sufficient straps to immobilize the victim? □ Yes □ No
    - Resuscitation mask with one-way valve? □ Yes □ No
    - Disposable gloves? □ Yes □ No
    - AED? □ Yes □ No
    - First aid supplies? □ Yes □ No
    - Cleaning supplies? □ Yes □ No
A biohazard action plan that requires:

- Immediate closure of the aquatic facility in the event of a bodily fluid contamination (feces, vomit, or blood)? □ Yes □ No

- The presence of at least one person who is trained on these standards for minimizing exposure to bodily fluids:
  - OSHA Personal Protective Equipment Standard? □ Yes □ No
  - OSHA Bloodborne Pathogens Standard? □ Yes □ No

An inclement weather plan, relevant for both indoor and outdoor pools, that details the aquatic facility’s response in the event of:

- Lightning? □ Yes □ No

- Hurricanes? □ Yes □ No

- Tornadoes? □ Yes □ No

- High winds? □ Yes □ No

## Facilities and Operations

### A. Operations

- Has the institution—specifically its administrators, athletics officials, and coaches—developed an operations manual for lifeguard and other pool personnel that:
  - Is readily accessible at the swimming pool? □ Yes □ No
  - Is available in both printed and electronic format? □ Yes □ No
  - Includes a list of pool chemicals and instructions for their safe handling? □ Yes □ No
  - Includes the names of people who are trained to minimize exposure to bodily fluids, including the OSHA standards listed above? □ Yes □ No
  - Details the facility’s communication protocols, such as:
    - When to close the pool? □ Yes □ No
    - When to notify administrators? □ Yes □ No

- To keep patrons safe and maintain the pool, do you conduct a daily preventive maintenance inspection before opening and at closing? □ Yes □ No
Is unauthorized entry prevented, especially during nonoperational hours, by using enclosures or barriers such as:
- Fencing? □ Yes □ No
- Gates? □ Yes □ No
- Locks? □ Yes □ No
- Electronic Locks? □ Yes □ No
- Self-closing and self-latching doors? □ Yes □ No

Do you limit access to nearby structures that can be climbed, including:
- Light poles? □ Yes □ No
- Site furnishings? □ Yes □ No
- Overhanging tree limbs? □ Yes □ No
- Obvious footholds or handholds? □ Yes □ No

B. Signage

- Have you developed signage with the assistance of legal counsel that complies with state and local law? □ Yes □ No
- Is signage placed in a conspicuous place at the entrance of and throughout the facility? □ Yes □ No

Does your signage include the following minimum rules and regulations:
- Swim only if certain minimum abilities standards are met, such as the Coast Guard or YMCA standards listed above? □ Yes □ No
- Dial 911 in case of an emergency? □ Yes □ No
- Hours of operation? □ Yes □ No
- Peak occupancy numbers? □ Yes □ No
- Pollution is prohibited? □ Yes □ No
- Do not swim with open wounds or if ill? □ Yes □ No
- Shower before entering the water? □ Yes □ No
- Diving allowed only where approved? □ Yes □ No
- Intentional hyperventilation or extended breath holding is dangerous and prohibited? □ Yes □ No
C. Incident Reports

- Do your lifeguards and pool operators record all injuries, illnesses, and incidents that:
  - Require lifeguard rescue? □ Yes □ No
  - Result in death? □ Yes □ No
  - Require resuscitation, CPR, oxygen, or AED use? □ Yes □ No
  - Require transportation of a patron to a medical facility? □ Yes □ No
  - Result in decreased water quality? □ Yes □ No

- Are incidents reported on a document that includes:
  - Date? □ Yes □ No
  - Time? □ Yes □ No
  - Location? □ Yes □ No
  - Incident type and cause? □ Yes □ No
  - Names and addresses of individuals involved? □ Yes □ No
  - Actions taken? □ Yes □ No
  - Equipment used? □ Yes □ No
  - Outcome? □ Yes □ No

- Are incident reports maintained consistent with your records retention policy and state and local law? □ Yes □ No

- Are incident reports reviewed regularly to identify and correct common or recurring risks? □ Yes □ No
D. Water Quality Monitoring

- Do you maintain a chemical inventory log that provides a list of chemicals used?  □ Yes □ No

- Do you monitor and test water quality:
  - Daily?  □ Yes □ No
  - In accordance with local and state regulations?  □ Yes □ No

- Do you require any employee who monitors and tests water quality to:
  - Have the proper training as required by law?  □ Yes □ No
  - Be at least 18 years old?  □ Yes □ No

Acknowledgment

This checklist was written by Joe Vossen, JD, associate risk management counsel for UE.