



STATE OF WASHINGTON  
**DEPARTMENT OF HEALTH**  
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June 20, 2020

Mark Freaney  
WRPA Aquatics Network Chair & Recreation Coordinator for City of Mountlake Terrace  
6100 219<sup>th</sup> St SW #200  
Mountlake, WA 98043

Re: Endorsement of REVISED Lifeguard Training Plans Proposed by Washington  
Recreation & Parks Association (WRPA)

Dear Mr. Freaney:

Thank you for submitting your revised proposal for lifeguard training plans during COVID-19 outbreak. Your revised proposal is attached to this letter below. I have reviewed your proposal and your response to my questions and concerns as provided below. I acknowledge that your proposed plans can be used to ensure that your lifeguards receive proper in-service training without compromising their ability to effectively monitor for and rescue patrons in distress while being protected from the COVID-19 infection risks. That being said, please understand that my evaluation of your proposal was primarily for making sure that lifeguards receive adequate training without compromise, and it was not for ensuring lifeguards safety with regards to COVID-19 transmissions. I believe an agency such as Washington State Department of Labor & Industries should review your proposal for proper protection of lifeguards from COVID-19 during training and while on duty.

If you have any questions I can be reached at (360) 236-3073 or [jun.naotsuka@doh.wa.gov](mailto:jun.naotsuka@doh.wa.gov).

Sincerely,

/s/ Junichi Naotsuka

Jun Naotsuka  
Water Recreation Program

cc: local health jurisdictions

### My questions to you:

- This is a new provision in the revised proposal that did not exist in the original proposal. *Unless specifically required, do not practice or perform the following skills under COVID-19 Recovery Lifeguard Training Provisions:*
  - i. *In-water ventilations*
  - ii. *Active victim front rescues*
  - iii. *Any land scenarios or follow-up care without PPE*
    1. *Ventilations must be completed with a Bag Valve Mask; rescuers may not remove their face masks to perform ventilations*
  1. When would this be specifically required?
  2. It says, “do not practice or perform...” Does that mean lifeguards may not practice during training or perform during actual rescue these skills?
  3. If yes to my above question, what implication does it have on lifeguards acquiring necessary lifesaving skills and the survival rate of and the prevention of permanent damage to a drowning victim and patrons in other kinds of distress?
  
- This was provided in the previous version, but not provided in the revised version: *Manikins are not appropriate for conscious victim skills training (such as conscious choking) or most in-water rescue skills and scenarios*

My understanding is that lifeguards need to be able to practice with a person who can/may move like a real person for acquiring these skills. If a real person is not used, what implication does it have on lifeguards acquiring necessary lifesaving skills and the survival rate and the prevention of permanent damage to a drowning victim and patrons in other kind of distress?

### Your responses:

1. This is specifically required for some Lifeguard Training certifications that are used in Washington State, but not all. – Some of those certification agencies have also send out modified training recommendations.
  - a. The American Red Cross has issued guidance that “facilities incorporating in-water resuscitation should consider temporarily discontinuing this practice.”
2. If I were teaching a Lifeguard Training Course to keep Lifeguards certified, and the certifying agency has not given authorization to “skip” in-water ventilation as a skill, I would have to teach it, but I would not practice it with my Lifeguards at their In-Service Trainings since we would not use this skill at my facility during the recovery. (My facility is relatively small, and it would always be possible and better to extricate a victim more quickly rather than perform in-water ventilations, but a lifeguard who must wait longer for back-up, such as a beach lifeguard towing a victim for a longer period of time might need to perform in-water ventilations to save the victim’s life.)
3. The committee believes that Lifeguards can still be adequately trained with these provisions, although some members have expressed concern about increasing time to follow-up care and first ventilations for victims. When weighed against the need to protect the lifeguards, we agreed that these provisions were necessary.
  - a. In-water ventilations are not included in all Lifeguard Training certifications, and with the ARC’s Scientific Council Guidance (from May 18, 2020), we agreed that we should exclude this skill unless it is required for the certification agency and/or due to the nature of the facility.
  - b. Approaching a victim from the rear, rather than the front may be more difficult if the victim is positioned facing the Lifeguard, but front rescues are not included in all certification programs and can relatively simply be replaced with rear rescues.

- c. Generally, most program recommend that Lifeguards use full PPE for all scenarios; the new requirement of wearing a face mask and the allowance of single-rescuer BVM use (i.e. in the ARC's Scientific Council Guidance) have been deemed necessary to keep the Lifeguards safe. – Previously, BVM use was designated as a multi-rescuer skill. We believe that this means that it will take more training for Lifeguards to master the new skill (single rescuer BVM), but that ultimately it will keep the rescuer and the victim safer in the COVID-19 recovery period.
- 4. L&I preferred that we re-wrote that section to Section 3.a in the Provisions document; they wanted a “list of what skills could be completed as contact-training,” and felt that including the phrase “most in-water skills and scenarios” would give too much leeway to facilities who don't have their staff's best interest in-mind. – Section 3.a gives a specific list of the types of rescues that could be practiced using a live person (“contact training”), to avoid implying that there are other rescues that could be practiced on a live-person, as well.
  - a. Lifeguards would still use a real person for these rescues, which would meet most of the Lifeguard Training requirements with which the committee is familiar.

Reviewed by:

Jun Naotsuka

Water Recreation Program Manager  
Washington State Department of Health



Washington Recreation  
& Park Association

## Washington Recreation & Parks Association Aquatics Network Lifeguard Training Provisions during the COVID-19 Pandemic Recovery

*Revision as of June 18, 2020*

*Knowledge and understanding of the COVID-19 virus and related legislation may fluctuate. Lifeguard Training should be conducted according to the latest standards and Provisions may be updated to reflect new information. Trainers should ensure that they are using the most recent version of these Provisions and adhering to all State and local requirements.*

1. To protect Lifeguards and Lifeguard Training Participants, all skills should be practiced virtually unless otherwise specified in this document. Virtual training skills include, but are not limited to:
  - a. Introduction of skills or new EAPs
  - b. Bloodborne Pathogens Training & Exposure Control Plan
  - c. First-Aid Skills Most CPR/AED and unconscious victim skills
    - i. Equipment, including manikins, must be made available by the employer or trainer for staff or students to use at home to complete these virtual training requirements
  - d. Lecture and video portions of Lifeguard Training
    - i. Professionalism
    - ii. Video training segments
  - e. Policies/procedures training & customer service
  - f. Putting on full PPE quickly for emergencies
2. All staff and students must complete a mandatory COVID-19 screening prior to participating in each in-person training session. Skills that cannot be trained virtually, and training that must be completed in-person shall be socially distanced unless otherwise specified in this document.
  - a. In-person skills that must be socially distanced include:
    - i. Lifeguard pre-requisite evaluations
    - ii. Swimming
    - iii. Surface dives
    - iv. Entries and approaches
    - v. Equipment extension rescues
    - vi. Reaching assists
    - vii. Throwing assists
    - viii. Non-human object retrieval (i.e. retrieving a 10 lb object from the bottom of the pool, retrieving water manikins, etc.)
  - b. In addition to mandatory COVID-19 screening and social distancing requirements, Lifeguards and trainees shall:
    - i. Wear a face mask whenever not in the water
    - ii. Frequently hand washing for at least 20 seconds

1. Hands must be washed before commencing training, before returning from session breaks, before and after eating or using the restroom, and after completing the training session
      - iii. Sanitize all equipment between individuals using it and avoid sharing or switching equipment during training sessions
3. Lifeguards may complete mandatory in-water contact training and perform necessary emergency rescues, with restrictions, as indicated below:
  - a. Only the following rescues may be completed per the contact-training provisions included in this section:
    - i. Passive victim rear rescues (surface and submerged)
    - ii. Active victim rear rescues
    - iii. Spinal victim rescues
    - iv. Lifeguard escapes
    - v. Victim extrications from the water
    - vi. Multiple-rescuer emergency care scenarios
    - vii. Conscious victim obstructed airway response and care
  - b. Unless specifically required, do not practice or perform the following skills under COVID-19 Recovery Lifeguard Training Provisions:
    - i. In-water ventilations
    - ii. Active victim front rescues
    - iii. Any land scenarios or follow-up care without PPE
      1. Ventilations must be completed with a Bag Valve Mask; rescuers may not remove their face masks to perform ventilations
  - c. Emphasis shall be placed on non-contact rescues; training time for non-contact rescues shall be equal to or greater than recommended times for Lifeguard Training courses
  - d. If allowed by the Lifeguard certification agency, trainees shall be instructed in the single rescuer use of a Bag Valve Mask and practice this skill on a manikin.
  - e. All personnel not directly involved in a scenario shall remain socially distanced
  - f. Practice partners for drills shall be limited to 4-5 trainees per group
    - i. One-on-one partners for 2-person practice
      1. Possible third necessary for odd-numbered training groups
    - ii. Combined set of two pairs for multiple rescuer practice (or a maximum of 5 trainees per contact group)
  - g. Manikins shall be used whenever possible and specifically for all follow-up care post water extrication, CPR/AED/breathing Emergency skills and all land-based scenarios except conscious victim obstructed airway response and care, which shall be conducted with full PPE on both the rescuer and the victim
    - i. Water manikins may be used for additional practice for recognition and passive retrieval drills.
  - h. When practicing in-water rescues, use separate staff in full PPE (wearing gloves and a face mask) to perform extrications and follow-up care (this minimizes the wet primary responder's potential exposure to the victim without PPE protection)
    - i. Note: This requires at least one additional responder to avoid delaying care for the primary rescuer to put on PPE
    - ii. It is important to practice rescue roles as intended during a real emergency; staff need to be able to put on full PPE quickly, which may require additional training
  - i. Rescuers and training victims must wear masks and gloves whenever they are not in the water

4. Employers must provide individually assigned, cleaned, and sanitized rescue equipment during training and ensure that all equipment is properly and thoroughly cleaned and sanitized between users and training sessions.
  - a. Required training equipment includes:
    - i. Manikins
    - ii. Training AEDs
    - iii. Rescue Tubes
    - iv. Bag Valve Masks / Rescue masks
      1. Although training masks may not be equipped with a HEPA filter, all equipment intended for emergency use must be properly equipped with filters and trainees must be familiar with the equipment.
    - v. Personal Protective Equipment (PPE):
      1. Face masks
      2. Disposable gloves
5. Facility Emergency Action Plans shall be updated:
  - a. To reflect changes included in this document, and
  - b. To include the removal of face masks for water entry, and
  - c. To provide for staff and crowd control with social distancing guidelines in place (i.e. if the crowd is normally directed to move to the locker room during emergency care for a victim, the evacuation location may need to be adjusted)
6. Facilities must have a documented COVID-19 exposure response plan in-place for Lifeguards who may have been exposed to COVID-19 in an emergency rescue or during training
  - a. Lifeguards shall be informed of this exposure response plan, including reporting procedures and requirements, in detail, prior to engaging in training or working a shift in which they might be required to perform a rescue
  - b. Lifeguards should be informed of the danger of exposure to COVID-19 and that the risk cannot be fully eliminated at the facility
7. In addition to the Training Provisions above:
  - a. Consider practicing strategies for removing patrons who may be identified as symptomatic
  - b. Minimize potential exposure during an emergency by:
    - i. Placing emphasis during training and in Emergency Action Plans on non-contact rescue options (such as equipment/reach extension rescues)
    - ii. Avoid using “front rescue” techniques and focus on “rear rescue” techniques
    - iii. Socially distance all personnel that are not directly involved in the rescue and care of a victim

**Reviewed by:**

**Jun Naotsuka**

Water Recreation Program Manager  
Washington State Department of Health