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CHILDREN AND YOUTH CAMP SAFETY ACT, 1974

DOCUMENTS

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HEARING

BEFORE THE

SUBCOMMITTEE ON CHILDREN AND YOUTH

OF THE

COMMITTEE ON

LABOR AND PUBLIC WELFARE

UNITED STATES SENATE

NINETY-THIRD CONGRESS

SECOND SESSION

ON

S. 3639

TO PROVIDE FOR THE DEVELOPMENT AND IMPLEMENTATION OF PROGRAMS FOR YOUTH CAMP SAFETY

AND

S. 1830

TO PROVIDE FEDERAL LEADERSHIP AND GRANTS TO THE STATES FOR DEVELOPING AND IMPLEMENTING STATE PROGRAMS FOR YOUTH CAMP SAFETY STANDARDS

JULY 15, 1974



Printed for the use of the Committee on Labor and Public Welfare

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U.S. GOVERNMENT
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U.S. GOVERNMENT PRINTING OFFICE

41-208 O WASHINGTON : 1974

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CHILDREN AND YOUTH CAMP SAFETY ACT, 1974

MONDAY, JULY 15, 1974

U.S. SENATE,
SUBCOMMITTEE ON CHILDREN AND YOUTH
OF THE COMMITTEE ON LABOR AND PUBLIC WELFARE,
Washington, D.C.

The subcommittee met, pursuant to notice, at 9:35 a.m. in room 4232, Dirksen Senate Office Building, Senator Walter F. Mondale, subcommittee chairman, presiding.

Present: Senator Mondale.

Also present: Senator Ribicoff.

Committee staff present: Ellen Hoffman and A. Sidney Johnson III, professional staff members.

Senator MONDALE. The committee will come to order.

I apologize for being slightly late.

OPENING STATEMENT OF SENATOR MONDALE

Senator MONDALE. This morning we will hear testimony on the need for Federal legislation to protect children who attend camp. The two bills under consideration are S. 1830, introduced by Senator Ribicoff, and S. 3639, introduced by myself.

Each year over 7 million children go to camps across the Nation. Yet, it is generally agreed that only 6 States have comprehensive health and safety laws pertaining specifically to camps. In other States, camps are sometimes left to adapt to inapplicable hotel and restaurant regulations, and parents are left to wonder exactly what standards they can rely on to protect their children.

Each summer our children reap the harvest of this disorganization and confusion. According to our most recent figures, in 1973, 25 children died, 1,448 were injured, and 1,223 suffered serious illness. These figures are minimums, based on a voluntary and admittedly incomplete survey of camps. The figures represent a variety of human tragedies, including drownings, burns, and broken limbs. And we don't even know how much more is to be discovered because there is no adequate means to inspect camps and investigate accidents. Worse, when dangerous situations are uncovered, State officials usually lack enforcement power to change the conditions.

Clearly, this is not what parents have in mind when they send their children for a happy and healthy experience. Parents have a right to expect that their children are being cared for and supervised accord-

ing to reasonable standards of health and safety. They have a right to know exactly what conditions they are sending their children into, and they have a right to know which camps provide the safest experience.

The time has come for Congress to act. Now that HEW has completed its study on the extent of camping accidents and laws, delay can no longer be justified.

Among the conclusions of this study are:

1. "With very few exceptions, State laws relating to camp safety were found to be grossly inadequate. In some States, they were completely nonexistent;" and that

2. "Enforcement (of State laws) is difficult at best and often impossible to achieve."

In light of these conclusions it is imperative that some meaningful action be taken to assure the safety of our children.

Another camping season cannot slip by without any action to assure minimum conditions for health and safety. Another camping season cannot pass in which our only barometer of camp conditions comes from the all-too-late newspaper accounts of tragedies.

At this time I would like to insert the text of the bills under legislation.

[The texts of S. 3639 and S. 1830 follow:]

93D CONGRESS
2D SESSION

S. 3639

IN THE SENATE OF THE UNITED STATES

Mr. MONDALE (for himself and Mr. RIBICOFF) introduced the following bill; which was read twice and referred to the Committee on Labor and Public Welfare

A BILL

To provide for the development and implementation of programs for youth camp safety.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the "Children and Youth Camp Safety Act".

STATEMENT OF PURPOSE

SEC. 2. It is the purpose of this Act to protect and safeguard the health and well being of the youth of the Nation attending day camps, resident camps, and travel camps, by providing for establishment of Federal standards for safe operation of youth camps, to provide Federal assistance to the States in developing programs for implementing safety standards for youth camps, to provide for the Federal im-

plementation of safety standards for youth camps in States which do not implement such standards and for Federal recreational camps, thereby providing assurance to parents and interested citizens that youth camps and Federal recreational camps meet minimum safety standards.

DEFINITIONS

SEC. 3. For purposes of this Act—

(1) The term "youth camp" means—

(A) any parcel or parcels of land having the general characteristics and features of a camp as the term is generally understood, used wholly or in part for recreational or educational purposes and accommodating five or more children under 18 years of age, living apart from their relatives, parents, or legal guardians for a period of, or portions of, 5 days or more, and includes a site that is operated as a day camp or as a resident camp; and

(B) any travel camp which sponsors or conducts group tours within the United States, or foreign group tours originating or terminating within a State, for educational or recreational purposes, accommodating within the group five or more children under 18 years of age, living apart from their relatives, parents, or legal guardians for a period of 5 days or more.

(2) The term "youth camp safety standards" means

criteria directed toward safe operations of youth camps, in such areas as—but not limited to—personnel qualifications for director and staff; ratio of staff to campers; sanitation and public health; personal health, first aid, and medical services; food handling, mass feeding, and cleanliness; water supply and waste disposal; water safety, including use of lakes and rivers, swimming and boating equipment and practices; vehicle condition and operation; building and site design; equipment; and condition and density of use.

(3) The term "youth camp operator" means any private agency, organization, or person, and any individual, who operates, controls, or supervises a youth camp, whether such camp is operated for profit or not for profit.

(4) The term "Secretary" means the Secretary of Health, Education, and Welfare.

(5) The term "State" includes each of the several States, the District of Columbia, Puerto Rico, and the Virgin Islands.

GENERAL DUTY

SEC. 4. Each youth camp operator shall provide to each camper safe and healthful conditions, facilities, and equipment which are free from recognized hazards that are causing, or are likely to cause, death, serious illness, or serious physical harm, as well as adequate and qualified instruction

and supervision at all times, wherever or however such camp activities are conducted and with due consideration of conditions existing in nature.

PROMULGATION OF YOUTH CAMP SAFETY STANDARDS

SEC. 5. The Secretary shall develop, and shall by rule promulgate, modify, or revoke youth camp safety standards. In developing such standards, the Secretary shall consult with State officials and with representatives of appropriate public and private organizations, and shall consider existing State regulations and standards and standards developed by private organizations which are applicable to youth camp safety. The Secretary shall make the initial promulgation of standards required by this section within 1 year after the effective date of this Act.

STATE JURISDICTION AND STATE PLANS

SEC. 6. (a) Any State which, at any time, desires to assume responsibility for development and enforcement of youth camp safety standards applicable to youth camps therein (other than travel camps) shall submit a State plan for the development of such standards and their enforcement.

(b) The Secretary shall approve a plan submitted by a State under subsection (a), or any modification thereof, if such plan in his judgment—

(1) designates a State agency as the agency

responsible for administering the plan throughout the State,

(2) provides for the development and enforcement of youth camp safety standards which standards (and the enforcement of such standards) are or will be at least as effective in providing safe operation of youth camps (other than travel camps) in the State as the standards promulgated under section 5,

(3) provides for the enforcement of the standards developed under paragraph (2) in all youth camps in the State which are operated by the State or its political subdivisions,

(4) provides for an inspection of each such youth camp at least once a year during a period the camp is in operation,

(5) provides for an advisory committee, to advise the State agency on the general policy involved in inspection and certification procedures under the State plan, which committee shall include among its members representatives of other State agencies concerned with camping or programs related thereto and persons representative of professional or civic or other public or nonprofit private agencies, organizations, or groups concerned with organized camping,

(6) provides for a right of entry and inspection of

all such youth camps which is at least as effective as that provided in section 9,

(7) contains satisfactory assurances that such State agency has or will have the legal authority and qualified personnel necessary for the enforcement of such standards,

(8) gives satisfactory assurances that such State will devote adequate funds to the administration and enforcement of such standards,

(9) provides that such State agency will make such reports in such form and containing such information as the Secretary may reasonably require,

(10) provides assurances that State funds will be available to meet the portions of the cost of carrying out the plan which are not met by Federal funds, and

(11) provides such fiscal control and fund accounting procedures as may be necessary to assure proper disbursement of and accounting of funds received under this Act.

(c) The Secretary shall approve any State plan which meets the requirements of subsection (a), but shall not finally disapprove any such plan, or any modification thereof, without affording the State agency reasonable notice and an opportunity for a hearing.

(d) Whenever the Secretary finds, after affording due

notice and opportunity for a hearing, that in the administration of the State plan there is a failure to comply substantially with any provision of the State plan (or any assurance contained therein), he shall (1) notify the State agency of his withdrawal of approval of such plan and upon receipt of such notice such plan shall cease to be in effect, but the State may retain jurisdiction in any case commenced before the withdrawal of the plan in order to enforce standards under the plan whenever the issues involved do not relate to the reasons for the withdrawal of the plan; and (2) shall notify such State agency that no further payments will be made to the State under this Act (or in his discretion, that further payments to the State will be limited to programs or portions of the State plan not affected by such failure), until he is satisfied that there will no longer be any failure to comply. Until he is so satisfied, no further payments may be made to such State under this Act (or payment shall be limited to programs or portions of the State plan not affected by such failure).

(e) The State may obtain a review of a decision of the Secretary withdrawing approval of or rejecting its plan by the United States court of appeals for the circuit in which the State is located by filing in such court within 30 days following receipt of notice of such decision a petition to modify or set aside in whole or in part the action of the

Secretary. A copy of such petition shall forthwith be served upon the Secretary, and thereupon the Secretary shall certify and file in the court the record upon which the decision complained of was issued as provided in section 2112 of title 28, United States Code. Unless the court finds that the Secretary's decision in rejecting a proposed State plan or withdrawing his approval of such plan is not supported by substantial evidence the court shall affirm the Secretary's decision. The judgment of the court shall be subject to review by the Supreme Court of the United States upon certiorari or certification as provided in section 1254 of title 28, United States Code.

GRANTS TO STATES

SEC. 7. (a) The Secretary may make grants to States which have in effect plans approved under section 6 to assist them in carrying out such plans. No such grant may exceed 80 per cent of the cost of developing and carrying out the State plan. Payments under this section may be made in installments and in advance or by way of reimbursement with necessary adjustments on account of underpayments or overpayments.

(b) There are authorized to be appropriated for the fiscal year 1973, and each of the five succeeding fiscal years, such sums as may be necessary to make the grants provided for in this section.

ENFORCEMENT BY SECRETARY; CITATIONS

SEC. 8. (a) The Secretary shall be responsible for the enforcement of youth camp safety standards in States which do not have in effect a State plan approved under section 6, and with respect to travel camps.

(b) The Secretary shall issue regulations and procedures providing for citations to youth camp operators for any violation of the duty imposed by section 4, of any standard, rule, or order promulgated pursuant to section 5, or of any regulations prescribed pursuant to this Act. Each citation shall fix a reasonable time for the abatement of the violation. The Secretary may prescribe procedures for the issuance of a notice in lieu of a citation with respect to *de minimus* violations which have no direct or immediate relationship to safety or health.

INSPECTIONS, INVESTIGATIONS, AND RECORDS

SEC. 9. (a) In order to carry out his duties under this Act, the Secretary may enter and inspect any youth camp and its records, may question employees, and may investigate facts, conditions, practices, or matters to the extent he deems it necessary or appropriate.

(b) For the purpose of any hearing or investigation provided for in this Act, the provisions of section 8(b) of the Occupational Safety and Health Act of 1970 shall be applicable to the Secretary.

(c) To determine the areas in which safety standards are necessary and to aid in promulgating meaningful regulations, camps subject to the provisions of this Act shall be required to report annually, on the date prescribed by the Secretary, all accidents resulting in death, injury, and illness, other than minor injuries which require only first aid treatment and which do not involve medical treatment, loss of consciousness, restriction of activity or motion, or premature termination of the camper's term at the camp. Camps operating solely within a State which has in effect a State plan approved under section 6 shall file their reports directly with that State, and the State shall promptly forward such reports on to the Secretary. All other camps, including travel camps, shall file their reports directly with the Secretary. The Secretary shall compile the statistics reported and include summaries thereof in his annual report to the President and Congress.

PENALTIES

SEC. 10. (a) Any youth camp operator who willfully or repeatedly violates the requirements of section 4, any standard, rule, or order promulgated pursuant to section 5, or of any regulations prescribed pursuant to this Act may be assessed a civil penalty of up to $2,500 for each violation.

(b) Any youth camp operator who has received a second or subsequent citation for a serious violation of the same

nature of the requirements of section 4, of any standard, rule, or order promulgated pursuant to section 5, or of any regulations prescribed pursuant to this Act, shall be assessed a civil penalty of up to $1,000 for each such violation.

(c) Any youth camp operator who fails to correct a violation for which a citation has been issued under section 8(b) within the period permitted for its correction may be assessed a civil penalty of not more than $500 for each day during which such failure or violation continues, or until the camp closes in its normal course of business.

(d) For purposes of subsection (b) a serious violation shall be deemed to exist in a youth camp if there is substantial probability that death or serious physical harm could result from a condition which exists, or from one or more practices, means, methods, operations, or processes which have been adopted or are in use, in such camp, unless the operator did not, and could not with the exercise of reasonable diligence, know of the presence of the violation.

(e) Civil penalties owed under this Act shall be paid to the Secretary for deposit into the Treasury of the United States and shall accrue to the United States and may be recovered in a civil action in the name of the United States brought in the United States district court for the district where the violation is alleged to have occurred or where the operator has his principal office.

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PROCEDURES TO COUNTERACT IMMINENT DANGERS

SEC. 11. (a) The United States district courts shall have jurisdiction, upon petition of the Secretary, to restrain any conditions or practices in any youth camp, or in any place where camp activities are conducted, which are such that a danger exists which could reasonably be expected to cause death or serious physical harm immediately or before the imminence of such danger can be eliminated through the enforcement procedures otherwise provided by this Act. Any order issued under this section may require such steps to be taken as may be necessary to avoid, correct, or remove such imminent danger and prohibit the presence of any individual in locations or under conditions where such imminent danger exists, except individuals whose presence is necessary to avoid, correct, or remove such imminent danger.

(b) Upon the filing of any such petition, the district court shall have jurisdiction to grant such injunctive relief or temporary restraining order pending the outcome of an enforcement proceeding pursuant to this Act.

(c) Whenever and as soon as an inspector concludes that conditions or practices described in subsection (a) exist in any campsite or place of camp activity, he shall inform the affected campers, camp owners, and camp supervisory personnel of the danger and that he is recommending to the Secretary that relief be sought.

VARIATIONS

SEC. 12. The Secretary, upon application by a camp owner showing extraordinary circumstances or undue hardship, and upon the determination by a field inspector, after inspection of the affected premises and facilities, that the conditions, practices, or activities proposed to be used are as safe and healthful as those which would prevail if the camp owner complied with the standard, may exempt such camp or activity from specific requirements of this Act, but the terms of such exemption shall require appropriate notice thereof to parents or other relatives of affected campers.

TRAVEL CAMPS

SEC. 13. (a) All travel camps shall register annually with the Secretary on such date as he shall prescribe.

(b) Registration shall consist of a declaration of intent to operate a travel camp and shall contain such other information as the Secretary may reasonably require, such as, but not limited to, a disclosure of the principal owners and/or operators and their addresses, a list of key supervisory personnel and their qualifications, the equipment belonging to the camp which will be utilized in operating the camp, and a reasonably explicit description of the itinerary for each planned tour route and activities, number of enrollment, number of counsellors and supervisory personnel to accompany each tour and their qualifications.

FEDERAL RECREATIONAL CAMPS

SEC. 14. (a) The Secretary shall develop safety standards to govern the operation of Federal recreational camps. The Secretary shall cooperate with Federal officers and agencies operating Federal recreational camps to assure that such camps are operated in compliance with the Secretary's standards. The Secretary may make the services of personnel of the Department of Health, Education, and Welfare available, without reimbursement, to other Federal agencies to assist them in carrying out this section.

(b) For purposes of this section, a Federal recreational camp is a camp or campground which is located on Federal property and is operated by, or under contract with, a Federal agency to provide opportunities for recreational camping to the public.

ADVISORY COUNCIL ON YOUTH CAMP SAFETY

SEC. 15. (a) The Secretary shall establish in the Department of Health, Education, and Welfare an Advisory Council on Youth Camp Safety to advise and consult on policy matters relating to youth camp safety, particularly the promulgation of youth camp safety standards. The council shall consist of the Secretary, who shall be chairman, and nine members appointed by him, without regard to the civil service laws, from persons who are specially qualified by experi-

ence and competence to render such service and shall include one representative from the Department of the Interior. Prior to making such appointments, the Secretary shall consult with appropriate associations representing organized camping.

(b) The Secretary may appoint such special advisory and technical experts and consultants as may be necessary in carrying out the functions of the council.

(c) Members of the Advisory Council, while serving on business of the Advisory Council, shall receive compensation at a rate to be fixed by the Secretary, but not exceeding $100 per day, including traveltime; and while so serving away from their homes or regular places of business, they may be allowed travel expenses, including per diem in lieu of subsistence, as authorized by section 5703 of title 5, United States Code, for persons in the Government service employed intermittently.

ADMINISTRATION

SEC. 16. (a) The Secretary shall prepare and submit to the President for transmittal to the Congress at least once in each fiscal year a comprehensive and detailed report on the administration of this Act.

(b) The Secretary is authorized to request directly from any department or agency of the Federal Government information, suggestions, estimates, and statistics needed to

carry out his functions under this title; and such department or agency is authorized to furnish such information, suggestions, estimates, and statistics directly to the Secretary.

(c) Nothing in this Act or regulations issued hereunder shall authorize the Secretary, a State agency, or any official acting under this law to restrict, determine, or influence the curriculum, program, or ministry of any youth camp.

(d) Nothing in this Act shall be deemed to authorize or require medical examination, immunization, or treatment for those who object thereto on religious grounds, except where such is necessary for the protection of the health or safety of others.

AUTHORIZATION

SEC. 17. There are authorized to be appropriated to carry out the provisions of this Act (in addition to the amounts authorized in section 7) such sums as may be necessary for the fiscal year ending June 30, 1973, and for each of the five succeeding fiscal years.

EFFECTIVE DATE

SEC. 18. This Act shall take effect 90 days after the date of its enactment.

93D CONGRESS
1ST SESSION

S. 1830

IN THE SENATE OF THE UNITED STATES

MAY 16, 1973

Mr. RIBICOFF introduced the following bill; which was read twice and referred to the Committee on Labor and Public Welfare

A BILL

To provide Federal leadership and grants to the States for developing and implementing State programs for youth camp safety standards.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the "Youth Camp Safety Act".

STATEMENT OF PURPOSE

SEC. 2. It is the purpose of this Act to protect and safeguard the health and well-being of the youth camps, resident camps, and travel camps, by providing for establishment of Federal standards for safe operation of youth camps, and to provide Federal assistance and leadership to the States in developing programs for implementing safety standards for

youth camps, thereby providing assurance to parents and interested citizens that youth camps meet minimum safety standards.

DEFINITIONS

SEC. 3. As used in this title—

(a) The term "youth camp" means:

(1) any parcel or parcels of land having the general characteristics and features of a camp as the term is generally understood, used wholly or in part for recreational or educational purposes and accommodating for profit or under philanthropic or charitable auspices five or more children under eighteen years of age, living apart from their relatives, parents, or legal guardians for a period of, or portions of, five days or more, and includes a site that is operated as a day camp or as a resident camp; and

(2) any travel camp which for profit or under philanthropic or charitable auspices, sponsors or conducts group tours within the United States, or foreign group tours originating or terminating within the United States, for educational or recreational purposes, accommodating within the group five or more children under eighteen years of age living apart from their relatives, parents, or legal guardians for a period of five days or more.

(b) The term "person" means any individual, partner-

ship, corporation, association, or other form of business enterprises.

(c) The term "safety standards" means criteria directed toward safe operation of youth camps, in such areas as—but not limited to—personnel qualifications for director and staff; ratio of staff to campers; sanitation and public health; personal health, first aid, and medical services; food handling, mass feeding, and cleanliness; water supply and waste disposal; water safety including use of lakes and rivers, swimming and boating equipment and practices; vehicle condition and operation; building and site design; equipment; and condition and density of use.

(d) The term "Secretary" means the Secretary of Health, Education, and Welfare.

(e) The term "State" includes each of the several States and the District of Columbia.

GRANTS TO STATES FOR YOUTH CAMP SAFETY STANDARDS

SEC. 4. From sums appropriated pursuant to section 10 of this Act, but not to exceed $2,500,000 of such appropriation for any fiscal year, the Secretary is authorized to make grants to States which have State plans approved by him under section 6 to pay up to 50 per centum of the cost of developing and administering State programs for youth camp safety standards.

SEC. 5. In developing Federal standards for youth camps, the Secretary shall—

(a) undertake a study of existing State and local regulations and standards, and standards developed by private organizations, applicable to youth camp safety, including the enforcement of such State, local, and private regulations and standards;

(b) establish and publish youth camp safety standards within one year after enactment of the title, after consultation with State officials and with representatives of appropriate private and public organizations after opportunity for hearings and notification published in the Federal Register; and

(c) authorize and encourage camps certified by the States as complying with the published Federal youth camp standards to advertise their compliance with minimum safety standards.

STATE PLANS

SEC. 6. (a) Any State desiring to participate in the grant program under this title shall designate or create an appropriate State agency for the purpose of this section, and submit, through such State agency, a State plan which shall—

(1) set forth a program for State supervised annual inspection of, and certification of compliance with,

minimum safety standards developed under the provisions of sections 5 and 9(a) of this title, at youth camps located in such State;

(2) provide assurances that the State will accept and apply such minimum youth camp safety standards as the Secretary shall by regulations prescribe;

(3) provide for the administration of such plan by such State agency;

(4) provide for an advisory committee, to advise the State agency on the general policy involved in inspection and certification procedures under the State plan, which committee shall include among its members representatives of other State agencies concerned with camping or programs related thereto and persons representative of professional or civic or other public or nonprofit private agencies, organizations, or groups concerned with organized camping;

(5) provide that such State agency will make such reports in such form and containing such information as the Secretary may reasonably require;

(6) provide assurance that the State will pay from non-Federal sources the remaining cost of such program; and

(7) provide such fiscal control and fund accounting procedures as may be necessary to assure proper dis-

bursement of and accounting of funds received under this title.

(b) Any State desiring to enable youth camps in the State to advertise compliance with Federal youth camp standards, but which does not wish to participate in the grant programs under this title, shall designate or create an appropriate State agency for the purpose of this section, and submit, through such State agency a State plan which shall accomplish the steps specified in (a) (1) through (3) of this section, and which provides for availability of information so that the Secretary may be assured of compliance with the standards.

(c) The Secretary shall not finally disapprove any State plan submitted under this title or any modification thereof, without first affording such State agency reasonable notice and opportunity for a hearing.

DETERMINATION OF FEDERAL SHARE; PAYMENTS

SEC. 7. (a) The Secretary shall determine the amount of the Federal share of the cost of programs approved by him under section 6 based upon the funds appropriated therefor pursuant to section 10 for that fiscal year and upon the number of participating States; except that no State may receive a grant under this title for any fiscal year in excess of $50,000.

(b) Payments to a State under this title may be made

in installments and in advance or by way of reimbursement with necessary adjustments on account of overpayments or underpayments.

OPERATION OF STATE PLANS; HEARINGS AND JUDICIAL REVIEW

SEC. 8. (a) Whenever the Secretary, after reasonable notice and opportunity for hearing to the State agency administering a State plan approved under this title, finds that—

(1) the State plan has been so changed that it no longer complies with the provisions of section 6, or

(2) in the administration of the plan there is a failure to comply substantially with any such provision,

the Secretary shall notify such State agency that no further payments will be made to the State under this title (or in his discretion, that further payments to the State will be limited to programs or portions of the State plan not affected by such failure), until he is satisfied that there will no longer be any failure to comply. Until he is so satisfied, no further payments may be made to such State under this title (or payment shall be limited to programs or portions of the State plan not affected by such failure).

(b) A State agency dissatisfied with the final action of the Secretary under section 6 or subsection (a) of this section may appeal to the United States court of appeals for the

circuit in which the State is located, by filing a petition with such court within sixty days after such final action. A copy of the petition shall be forthwith transmitted by the clerk of the court to the Secretary or any officer designated by him for that purpose. The Secretary thereupon shall file in the court the record of the proceedings on which he based his action, as provided in section 2112 of title 28, United States Code. Upon the filing of such petition, the court shall have jurisdiction to affirm the action of the Secretary or to set it aside, in whole or in part, temporarily or permanently, but, until the filing of the record, the Secretary may modify or set aside his order. The findings of the Secretary as to the facts, if supported by substantial evidence, shall be conclusive, but the court, for good cause shown, may remand the case to the Secretary to take further evidence, and the Secretary may thereupon make new or modified findings of fact and may modify his previous action, and shall file in the court the record of the further proceedings. Such new or modified findings of fact shall likewise be conclusive if supported by substantial evidence. The judgment of the court affirming or setting aside, in whole or in part, any action of the Secretary shall be final, subject to review by the Supreme Court of the United States upon certiorari or certification as provided in section 1254 of title 28, United States Code. The commencement of proceedings under this subsection

shall not, unless so specifically ordered by the court, operate as a stay of the Secretary's action.

ADVISORY COUNCIL ON YOUTH CAMP SAFETY

SEC. 9. (a) The Secretary shall establish in the Department of Health, Education, and Welfare an Advisory Council on Youth Camp Safety to advise and consult on policy matters relating to youth camp safety, particularly the promulgation of youth camp safety standards. The Council shall consist of the Secretary, who shall be Chairman, and eighteen members appointed by him, without regard to the civil service laws, from persons who are specially qualified by experience and competence to render such service. Prior to making such appointments, the Secretary shall consult with appropriate associations representing organized camping.

(b) The Secretary may appoint such special advisory and technical experts and consultants as may be necessary in carrying out the functions of the Council.

(c) Members of the Advisory Council, while serving on business of the Advisory Council, shall receive compensation at a rate to be fixed by the Secretary, but not exceeding $100 per day, including traveltime; and while so serving away from their homes or regular places of business, they may be allowed travel expenses, including per diem in lieu of subsistence, as authorized by section 5703 of title 5,

United States Code, for persons in the Government service employed intermittently.

ADMINISTRATION

SEC. 10. (a) The Secretary shall prepare and submit to the President for transmittal to the Congress at least once in each fiscal year a comprehensive and detailed report on the administration of this title.

(b) The Secretary is authorized to request directly from any department or agency of the Federal Government information, suggestions, estimates, and statistics needed to carry out his functions under this title; and such department or agency is authorized to furnish such information, suggestions, estimates, and statistics directly to the Secretary.

(c) Nothing in this title or regulations issued hereunder shall authorize the Secretary, a State agency, or any official acting under this law to restrict, determine, or influence the curriculum, program, or ministry of any youth camp.

AUTHORIZATION

SEC. 11. There are authorized to be appropriated to carry out the provisions of this Act the sum of $3,000,000 for the fiscal year ending June 30, 1974, and for each of the five succeeding fiscal years.

Senator MONDALE. At this time I would like to call on the subcommittee's first witness, Senator Abraham Ribicoff of Connecticut. Senator Ribicoff is the author of S. 1830, one of the bills before the subcommittee today. He has worked for years to get this type of legislation approved by Congress, and I commend him for his efforts.

We are very pleased to have you.

STATEMENT OF HON. ABRAHAM RIBICOFF, A U.S. SENATOR FROM THE STATE OF CONNECTICUT

Senator RIBICOFF. Thank you, Mr. Chairman.

First may I commend you for your overall leadership in this Nation on the problems of children and youth. I am glad you are holding these hearings.

I have been trying to get the Labor and Public Welfare Committee to hold hearings for some 8 years.

I think we have to realize as we sit here today that some 7 million boys and girls are at summer camp. For most of them it is going to be a great experience, but for a tragic few it means injury and death.

I first became involved in this problem when I was visited by Mitch Kurman of Westport, Conn., who lost a son in a tragic accident in the Maine woods.

There is no question in my mind that it was due to lack of camp safety laws. You will be hearing from Mitch Kurman, who has been a national crusader. He has gotten many people involved and I commend him to you, Mr. Chairman.

I would also ask unanimous consent that my full statement go into the record as though read.

Senator MONDALE. We are pleased to do that.

Senator RIBICOFF. May I point out that I have no pride of authorship. It makes no difference to me whether it is the Ribicoff bill or the Mondale bill. I think the time has come to really pass a good bill.

This is the ninth summer since Mitch Kurman and I brought this problem to the attention of Congress, and since then too many children have died and untold numbers injured.

It seems to me we simply cannot allow the situation to remain as it is. Each day or week or month means another camping accident or even death that could have been prevented by strong camp safety legislation.

I am sure that the committee under your leadership will act quickly and forcefully. I would hope the Senate and the House would follow suit so at least by next summer we can have meaningful camp safety laws protecting millions of young people so they will be assured of a good summer instead of an unhappy tragic summer.

I want to thank you very much, Mr. Chairman, for holding these hearings allowing me to testify.

Senator MONDALE. Thank you very much, Senator Ribicoff, for appearing here this morning and for your leadership on this issue.

One of the factors we will have to face is apparently a report on camp safety conditions which were authorized by the Congress in 1971. HEW prepared a report that just came out in which in effect they seem to be arguing there is not much of a problem.

Senator RIBICOFF. The problem is there. The House asked for a study in an attempt to duck the issue. Up until now HEW has never been enthusiastic. They have dragged their feet.

Now they have completed this study. To put it mildly it is a waste of the taxpayers' money because all HEW tells us is what we already know—that there is a serious and often dangerous absence of adequate camp safety laws.

All the study did was delay substantive legislation.

Usually when you want to duck an issue, you say let us make a study and you put it off. I would hope that HEW would finally come down on the side of "let's do something about it."

The matter has been studied to death. There is not a thing that HEW told us after spending that money that you and I, people interested in camp safety, did not know. You will be hearing, I understand, from HEW. You will have an opportunity to question them further.

But Mitch Kurman and other members who are interested in children and youth camp safety are here, and I am sure they will be able to give you many of the details.

All the legitimate nationally recognized youth camp organizations have been for doing something about it. They endorsed my bill, and I am sure they will find your bill acceptable too. I am sure that my staff and your staff and you and I can work out a bill that will have not only congressional support but the support of all the people interested in children.

Senator MONDALE. Thank you very much. I look forward to working with you in the development of a single measure.

Thank you very much. We appreciate your appearance.

Senator RIBICOFF. Thank you.

PREPARED STATEMENT OF HON. ABRAHAM RIBICOFF, A U.S. SENATOR FROM THE STATE OF CONNECTICUT

I am pleased to appear before you today in support of youth camp safety legislation.

As we sit here upwards of 7 million young American boys and girls are at summer camp. For most of them it will be an experience they will long remember. For a tragic few, however, their camping experience may mean injuries and even death.

Very few people are even aware that there is a camp safety problem. Most parents simply consider summer camps an extension of school. They respond to an ad or follow the advice of a friend and send their child off to camp. Little do they realize that the laws covering that camp or protecting their children are grossly inadequate and often do not even exist.

I am confident later witnesses will give you the full and grim details of this disturbing situation.

I, for one, did not realize the seriousness of the problem until Mitch Kurman of Westport, Conn., who will be testifying later this morning, came to see me 8 years ago with the tragic story of his son's death on a wild river in northern Maine. Mitch told me of his discovery of the nationwide lack of camp safety laws and asked for my help on the Federal level.

I then drafted and introduced the Youth Camp Safety Act, the forerunner of S. 1830, which is now before the committee.

In each Congress since 1966 I have reintroduced the bill and asked for its consideration. Finally, in August 1971 I offered it as an amendment to the Higher Education Act and it was adopted by unanimous vote. Unfortunately, the camp safety bill reported out by the House Education and Labor Committee was deleted on the House floor and a weak study provision put in its place. That provision regrettably prevailed in conference.

The study has now been completed. To put it mildly it was a waste of the taxpayers' money and simply told us what we already knew—that there is a serious and often dangerous absence of adequate youth camp safety laws. All the study did was delay substantive legislation.

We now have the opportunity to act.

You have before you two bills that can correct that situation, S. 1830, the Ribicoff Youth Camp Safety Act, and S. 3639, the Mondale Children and Youth Camp Safety Act of which I am a cosponsor.

Although they approach the basic problem from different angles, both bills have the same goal—to protect America's young campers.

I have no pride of authorship. I simply hope that the committee will take these two bills and, using them as a base, develop and report to the full Senate strong camp safety legislation.

This is the ninth summer since Mitch Kurman and I brought this problem to the attention of the Congress. Since then many children have died and untold numbers injured. We simply cannot allow the situation to remain as it is. Each day, week or month of delay means another camping accident or even death that could have been prevented by strong camp safety legislation.

I urge the committee to act quickly and forcefully.

Senator MONDALE. Our first panel of witnesses consists of Dr. Cooper, Deputy Assistant Secretary for Health; Frank Samuels, Deputy Assistant Secretary for Health Legislation; Dr. Kenneth Cook, vice president, Century Research Corp., Arlington, Va., if you will proceed.

STATEMENT OF THEODORE COOPER, M.D., DEPUTY ASSISTANT SECRETARY FOR HEALTH, DHEW; FRANK E. SAMUEL, JR., DEPUTY ASSISTANT SECRETARY FOR LEGISLATION (HEALTH), DHEW; J. MICHAEL LANE, M.D., DIRECTOR, SMALLPOX ERADICATION PROGRAM, CENTER FOR DISEASE CONTROL, DHEW; AND KENNETH G. COOK, PH. D., VICE PRESIDENT, CENTURY RESEARCH CORP., ARLINGTON, VA.; A PANEL

Dr. COOPER. I have with me also Dr. Michael Lane from the Center for Disease Control.

I am here to testify on two bills related to youth camp safety—S. 3639, the bill introduced by you, Mr. Chairman and cosponsored by Mr. Ribicoff; and S. 1830, the bill introduced by Mr. Ribicoff.

Youth camp safety has been of congressional concern since hearings were first conducted by the 90th Congress. This subject raises issues in which the Department has a vital interest.

For example, one of the six Public Health Service agencies within the Department, namely the Center for Disease Control, devotes much of its effort to the prevention of avoidable disease and illness; and this includes injury and death among summer youth campers.

Public Health Service physicians and technical personnel have provided disease prevention services for several Boy Scout jamborees. So we share your interest in understanding and preventing unnecessary illness, injury, and death among young people as well as the entire population.

During the earlier congressional hearings on summer youth camp safety, testimony was presented which suggested that there simply was no comprehensive information available on serious and preventable adverse health incidents affecting summer youth campers and on laws pertaining to such camps.

More particularly—the information available apparently did not permit the Congress to arrive at an informed conclusion concerning the necessity or suitability of Federal legislation on this matter.

Senator MONDALE. Did that amendment arise in the House?

Mr. SAMUEL. I honestly do not remember, Senator, whether it arose in the House or the Senate. I know it came up in connection——

Senator MONDALE. This was presented by Representative Pickle in the House.

Mr. SAMUEL. I believe that is correct, yes, sir.

Dr. COOPER. In an attempt to mend this deficiency, the Congress enacted Public Law 90–318, the education amendments of 1972, which called for the further study of summer youth camp safety and instructed the Secretary of the Department of Health, Education and Welfare to make "a full and complete investigation and study to determine:

"1. The extent of preventable accidents and illnesses currently occurring in youth camps throughout the Nation;

"2. The contribution to youth camp safety now being made by State and local public agencies and private groups;

"3. Whether existing State and local laws adequately deal with the safety of campers in youth camps;

"4. Whether existing State and local laws relating to youth camp safety are being effectively enforced; and

"5. The need for Federal laws in this field."

The legislation was enacted on June 23, 1972. It required a report from the Department including answers responding to the questions noted above, by March 1, 1973. Such a report could only meet this deadline if the data required were already in existence somewhere—and they were not.

The summer camping season was already well underway by June 23 and no study of illness, injury, and death among campers could be mounted during the 1972 camping season.

The Public Health Service undertook its investigation of this matter upon the passage of the legislation. HEW staff did a thorough review of the literature, undertook discussions with State and local officials and with national organizations having knowledge of these matters.

The result of this review by the Department confirmed that data currently available were incomplete. Further study was essential.

Accordingly, a report was made to the Congress by the data specified—March 1, 1973. This report addressed the nonavailability of data on preventable injuries and illnesses, reviewed existing literature on earlier studies pertaining to youth camp health and safety, summarized information obtained from State and local officials and public and private national organizations, and presented a plan for obtaining the information required in the legislation.

Since in the late summer of 1972 it was already evident that the Department could not answer Congress questions with existing data, the Public Health Service took appropriate steps at that time to make all necessary arrangements for a study of illness, injury, and death among summer youth campers during the 1973 camping season.

Furthermore, it moved to collect all laws and regulations pertaining either directly or indirectly to youth campers or the operation of such camps.

The planning for this further study was carried out during the winter of 1972 and the spring of 1973. During the summer of that year two contractors and a subcontractor carried out the investigations.

Senator MONDALE. Would you tell me how much was spent on those studies?

Dr. COOPER. Yes. The principal contract, the largest one for the survey of injuries and illnesses with Century Research for $187,542. The computing and software contract was $15,261. The field test forms development cost $1,500. There was a press review service that cost $600.

The compilation of camp lists and labeling for further mailing and review were $2,200. The evaluation of the sampling plan cost $1,600. Those were the costs that were contracted out, not counting direct cost of the agencies involved.

Senator MONDALE. How much did you spend on the compilation of State laws and regulations as distinct from the analysis of surveys——

Dr. COOPER. The original study that was undertaken by the Department on a enactment of the legislation was done in-house and this inquiry to the States was addressed by polling the States of how many actual laws directly pertaining or directed toward youth camp safety were available and enforceable or what provisions they had.

The so-called Cordora contract, for $15,621, was a detailed reassessment of the States for all of the public health laws that would be of value, sewage, water, food service and so on.

Senator MONDALE. Of the total spent on survey studies, research, how much was spent on the determination of how many accidents, illnesses and so on occurred, approximately?

Dr. COOPER. $187,500——

Senator MONDALE. Did that all go into that question—it did not go into laws and regulations?

Dr. COOPER. No, sir.

Senator MONDALE. You may proceed.

Dr. COOPER. Of that $187,000 Dr. Lane reminds me approximately $40,000 of it was a subcontract to the National Parks and Recreation Service, which was included to assess, collect, and collate the informa-

tion from voluntary organizations and private organizations, so $40,000 of the $187,000 were not involved in surveying the camp sample.

While the information gathering went smoothly, two circumstances delayed the prompt completion of the report:

1. The body of law and regulation gathered by the contractor required a more painstaking analysis than had been envisioned in the original contract.

Accordingly, the contractor was requested to undertake this additional analysis—thus delaying a final report on law and regulation until early February of this year.

2. The injury and illness data emanating from the survey presented more analysis difficulties than has been anticipated. This contractor's report was also provided to the Department on about February 1.

The Department analyzed the data and prepared the report which was transmitted to Congress April 29.

Now I would like to recapitulate the findings produced by this study:

1. The rates of severe injury and illness among campers attending the approximately 200 camps were low—0.1 percent per 1,000 and 0.3 percent per 1,000 camper days, respectively.

No deaths were reported in these camps. Moreover, severe injuries, illnesses and deaths occurred with lower frequency among youngsters attending these 200 camps than occurs among this age group in the national population at large.

2. A mail survey and other sources of information identified 25 deaths among campers attending camps which were not part of the survey.

3. Undoubtedly, some of the severe injuries, or illnesses and deaths noted above were preventable.

4. No systematic reporting mechanism presently exists which provides reasonably complete information on the occurrence of severe injuries or illness and death associated with youth camps.

5. Twenty-eight States have laws and regulations specific to youth camps. Of these, only four were judged to have adequate legislation and regulation coupled with a regulatory requirement for the annual inspection of summer youth camps.

Since the completion of that report, New Jersey and New York have developed and implemented similar legislation.

6. The enforcement of existing laws and regulations on summer youth camps is deficient.

We recognize that the results of the survey of illness and injury may not be entirely representative of all camps. Of the 200 camps constituting the initially selected sample, only 128 actually participated.

Some of those not participating indicated a simple unwillingness to participate while others lacked the required time or staff to do so.

Still others had to be dropped because of early closing dates and others did not meet the specifications established for residential youth camps.

While replacement camps were drawn in a statistically random fashion, the total sample is in fact a selection of voluntary participants. The survey did include 212 camps. Thus, the statistical design does not allow us to conclude that the findings are necessarily applicable to all camps.

Senator MONDALE. Would it not be a possible conclusion, not only is it not representative, but the very camps that are having trouble with illnesses, injuries and deaths may be the ones which did not report?

Dr. COOPER. It is conceivable that some of them that were having greater problems were not involved and that is substantiated by the fact that we were able to get some reports of deaths that were not in the sample.

However, I think it would be inappropriate to conclude that the selection process specifically excluded any representation from those groups.

Senator MONDALE. In other words, what you tried to do is draw a scientific cross section of camps in the country and then send them questionnaires?

Dr. COOPER. Questionnaires and survey site teams.

Senator MONDALE. Now of the 200 camps that you selected, that you thought would give you a cross section, only 128 participated, is that correct?

Dr. COOPER. In the initial randomly selected sample, 128 participated. Eventually 212 did participate and the additional ones, well, the 84 were added randomly afterward, but in the sense that they agreed to participate, they were voluntary participants, so we did end up with 212.

Senator MONDALE. Voluntary participants?

Dr. COOPER. Yes.

Senator MONDALE. How many refused to participate?

Dr. COOPER. 72.

Senator MONDALE. 72 in the first sample, before you were all done?

Dr. COOPER. Some of those 72 really did not refuse to participate. If you want a breakdown on what those 72 were, we can supply that for the record.

Senator MONDALE. You ended up with a random sample of 200 camps?

Dr. COOPER. Yes.

Senator MONDALE. In your first random sample, 72——

Dr. COOPER. Seventy-two were not acceptable, either because they refused it or because they did not meet specifications.

Senator MONDALE. Then I assume you developed further random samples, you have additional numbers which fell in that same category, either refused or for some reason were found to be inappropriate?

Dr. COOPER. Yes.

Senator MONDALE. How many in all were dropped out of the sample for those reasons?

You can submit that for the record.

Dr. COOPER. We will submit it for the record.

[The information referred to and subsequently supplied follows:]

RANDOM SAMPLE OF CAMPS

There were two random samples of camps asked to participate in the youth camp safety survey.

In the first sample of 200 camps, 72 did not participate for the following reason: 27 refused to cooperate, 13 were found not to be youth camps by definition,

11 were dropped by the contractor due to insufficient data, 8 were closed at the time of approach by the contractor, 5 were outside of the sampling cluster, 4 were divisions of other camps being considered, 3 could not be located, 1 was dropped for undocumented reasons.

In the second random sample of 146, 62 camps did not participate. The reasons for non-participation of these camps were as follows: 14 were closed at the time of approach of the contractor, 13 were found not to be "youth camps" by definition, 9 refused to cooperate because their "staffs were too busy," 6 were divisions of other camps, 5 could not be located, 3 provided insufficient data and when follow-up was made, the camps were closed, 2 were outside of the sampling cluster, 10 were excluded presumably for one of the above reasons, but contractor's records were inadequate to determine the specific reason.

Dr. COOPER. I mentioned earlier that the illness and injury rates among the campers studied was very low—namely .1 and .3 per 1,000 camper days. It is also true that the 25 deaths identified during the past season clearly indicate that camping is sometimes accompanied by tragedies for campers and their families. Those deaths must be evaluated with two facts in mind:

1. The information on camper deaths came from sources which might be expected to report all camp deaths but may have missed some.

2. The number of deaths reported, 25, is about one-half the number which would have been expected, given normal mortality rates for this age group in the national population at large.

The Department recognizes that the nature and extent of serious and preventable illness and injury and also death among campers are not fully understood since there is no monitoring system which reliably identified these events.

Nonetheless, the facts which are now available suggest that some action should be taken—even one camping death or serious injury is too many. We believe that the States, camping organizations, parents and youth groups, and the Federal Government should devote their respective efforts to promoting the health and safety of our youth campers.

The Children and Youth Camp Safety Act, S. 3639, directs the Secretary of Health, Education, and Welfare to develop and promulgate youth camp safety standards. It provides for departmental review of such plans and approval of State plans which are at least equal to Federal standards and which provide for the enforcement of such standards.

Grants, up to 80 percent of eligible costs, are authorized to be made to States with approved plans. The Secretary would be responsible for enforcement of youth camp safety standards in States without approved plans.

Camps would be required to report annually to the Secretary all accidents resulting in death and serious injury and illness. The Secretary would be responsible for the enforcement of Federal standards in travel camps. The legislation also directs the Secretary to develop and enforce safety standards in all Federal recreational camps.

U.S. district courts would have jurisdiction to restrain dangerous practices in youth camps. Finally, the bill provides for the establishment of an advisory council on youth camp safety to be chaired by the Secretary.

A similar bill, S. 1830, the Youth Camp Safety Act, directs the Secretary to establish and publish youth camp safety standards.

It also provides for a departmental review and approval of State plans for implementing these safety standards. Grants up to 50 percent of eligible costs, but not to exceed $50,000 for any one State, are authorized to be made to States who apply and whose plans are approved.

The bill also provides for the establishment of an advisory council. The major differences between this bill and S. 3639 are that S. 1830 contains no provision for direct Federal enforcement of safety standards and for reporting of accidents resulting in death and serious injury and illness; nor is there any provision for restraining dangerous practices in youth camps.

The Department's reaction to the provisions of S. 3639 and S. 1830 is an outgrowth of its appreciation of the severity of the problem, its views of the steps that should be taken to deal with the problem, and its judgments as to where responsibility lies for dealing with the problem.

Our study indicates that the death rate among summer youth campers is half that for the same age group in the population at large and that the injury rate is low.

We believe that the incidence of death and injury in camps ought to be reduced to the lowest possible level. Moreover, we feel that these problems should be seen as one portion of the larger issue of accidents and their prevention.

The occurrence and prevention of accidents have been subjects of public health concern for a good many years.

As you know, Mr. Chairman, public health is largely a matter of State responsibility; it has been so for many years. If one reviews the provisions of S. 3639 and 1830, it is evident that the functions in question are State public health responsibilities.

States do enact public health legislation, promulgate regulations, set standards, enforce the requirements, inspect to insure compliance, enact penalties, and react to imminent dangers to health and safety. The States have performed such functions in regard to public facilities which most resemble summer youth camps; namely, hotels, motels, and restaurants.

Furthermore, water quality, sewage disposal, food handling, fire safety—all matters germane to summer youth camps—are now responsibilities of State and local government.

We view our youth camp safety as a responsibility of the States, accordingly, we oppose enactment of S. 3639 and S. 1830. The Department stands ready, however, to render requested technical assistance in several areas to States, other Federal agencies which control Federal land used for camping purposes and to national camping associations.

Accordingly, the Department is now developing model legislation and regulation for adoption by States. It will encourage States, through the Council of State Governments and other means, to adopt such legislation and regulation.

If requested, the Department will provide technical assistance to States for the development of procedures to monitor serious illness, injury and death among summer youth campers. It will provide consultative services to Federal agencies administering facilities used by the public for camping.

It will also provide consultation to States and national camping organizations when the required consultation can best be provided by the Federal Government. All of these technical assistance and consultative services can be offered without additional legislative authority or funding.

The institution of monitoring, the elucidation of causal relationships, and the enactment and enforcement of legislation by the States have had salutary effects in the prevention of other health problems. I feel certain, Mr. Chairman, that comparable gains can be made through similar means in regard to the health and safety of summer youth campers.

In conclusion, the Department does not consider that Federal legislation is needed with regard to summer youth camps. Existing statutory authorities are fully adequate to enable us to institute measures to help guide the States in developing their proper lead role in assuring the health and safety of summer youth campers.

This does not mean we are not concerned about the problem and that further progress should be made in reducing death and preventable illness and injuries to the lowest possible level.

Mr. Chairman, we would be pleased to respond to any other questions you might care to raise at this time.

Senator MONDALE. Thank you very much. In the preliminary draft there are listed several limitations which would affect the accuracy of the draft. I am quoting here from HEW's documents:

First, data selection. "Camp personnel were requested to complete a report on all injuries and illnesses. The variety of reporting plus diversified methods of maintaining records caused camp investigators problems in obtaining data.

"Because the study was conducted by investigators who for the most part are unfamiliar with youth camp administration operation, questions from the forms were not uniformly completed by the investigator."

Two, incompleteness. "No day camps, travel camps, et cetera, were included in the study."

Three, "statistics were compiled on the effect of State laws in such a way as to provide little comparison to the effect regulatory measures had upon the operation of camps."

Four, "on the analysis of the illness and injury, supplemental nationwide data on serious injuries or illnesses, 3,343 camps collected by the Government were not organized in a manner useful in the overall investigation."

Five, "contracts for study were granted far too late in the year to provide proper preparation and accomplishment of the task."

Six, "although the draft report includes analysis of the cause of reported deaths, no such information is in the final public report, thus deemphasizing the fact that deaths even occurred."

Seven, questionnaires. "One portion of the study was the completion of questionnaires on serious illnesses or serious injury to be completed by camps. Less than half of the camps questioned, 3,300 out of 7,800, filled out the questionnaires. No deaths were reported on these. Yet there was apparently no attempt to find out about deaths and accidents, et cetera, in the camps which chose not to reply."

Now would you respond to these questions which go to the methodology and completeness and accuracy of your report.

Dr. COOPER. Yes, Mr. Chairman. There are several points I think ought to be made on the analysis.

Senator MONDALE. Let us start with, first, is it true you do not include day camps in your study?

Dr. COOPER. That is correct.

Senator MONDALE. Why would that be?

Dr. COOPER. Those were not in the original specifications. There are several day camps that are not tabulated, and we made the original sample selection size under statistical analysis, the youth camps excluding that as the best base of information. It was not included as a specific category in those camps whereas travel camps were.

Perhaps Dr. Lane would go into some detail.

Senator MONDALE. I do not want much detail. Did you include travel camps?

Dr. LANE. They were included, although only four, I believe, actually cropped up in the final sample.

Senator MONDALE. What is a travel camp?

Dr. LANE. One that starts at some point in space and time but the kids and their counselors move each day to a different site.

One of the reasons they are difficult to study is because your inspectors have a difficult time locating them on a given day. They are occupying different facilities and moving along. Day camps were excluded for the same reason. It is extremely difficult to come up with some kind of comprehensive list from which to sample.

There are so many day camps, they are so transient in their life and existence that the camp that existed this summer may not exist next summer. So that finding an adequate sampling frame from which to sample day camps was not possible.

Senator MONDALE. What about this statement that less than half the camps responded to the questionnaire; is that correct?

Dr. LANE. You recognize, Senator Mondale, there are two different studies involved here. There is the study that Century did in which their people actually went out and inspected onsite. The other is a mail survey done by the Center for Disease Control from a list of camps prepared from a variety of sources, and you are right, something in the order of less than half of the total mailed questionnaires were returned.

Dr. COOPER. It was in that group that the inability to respond specifically to the questions was a problem because actual detailed discussion of the information was available in the primary survey when the reviewers went out to the camp——

Senator MONDALE. Did the results of those questionnaires appear in your study?

Dr. LANE. We found that because so many people who, No. 1, did not respond, No. 2, of those who responded, they legitimately questioned the definition of what was serious injury and illness, we did not use that data to any great extent.

It did confirm in a rough and perhaps statistically imprecise manner its data collected by Century Research. One thing to use from that were any deaths reported, any fatalities we did include in our list.

Senator MONDALE. I am a little troubled because I assume if I were running a lousy camp and kids were getting sick and hurt, maybe even losing their lives, and I got a questionnaire from somebody, I assume that unless I am nuts I would not send it back.

Dr. LANE. Other than having gone through all of the some 4,000 camps that did not respond and make a field investigation——

Senator MONDALE. I understand you did not feel you had time or whatever it is to do that. That explains why the study is incomplete.

Dr. LANE. And for this reason we drew no conclusions from the mail survey other than counting any fatalities that were reported in that survey.

Senator MONDALE. But you just said it tended to confirm the other study.

Dr. COOPER. We did not say this in the final report.

Senator MONDALE. You said it this morning, though, did you not?

Dr. COOPER. With respect to the points on the mortality data that you raised, in the final report, in the absence of the commentary on that, on page 7, there are comments on the mortality issue.

Senator MONDALE. Now you did find, if I gather, there are only six States in which you found adequate laws with regulations and apparently with enforcement——

Dr. COOPER. With enforcement provisions, yes.

Senator MONDALE. If this is a serious problem, in most States there is not adequate protection.

Dr. COOPER. I think there are two answers to the question. One is that many States do not have very much youth camp safety activities and it would not be surprising that they would not have extensive activities in this regard.

In all the other States there are legislation features available which, if enforced, could contribute substantially to the improvement of conditions in camps—sewage, water control, food handling, fire regulations and the like.

Senator MONDALE. What you are proposing is that the Department of HEW stand by and help camps, and States and local communities, with technical assistance in developing legislation——

Dr. COOPER. We are developing model legislation which we are willing to advocate to States, to the Council of State governments. We already, for example, are providing direct assistance to the National Park Service for their camping activities.

Our public health officers in the regions are available as well as our headquarters staff in this area for other forms of technical assistance as I enumerated in the testimony.

Senator MONDALE. How many professional staff are working full-time on this problem?

Dr. COOPER. We do not have a staff which we identify as youth camp safety, because we think it is a problem also for adults and others, in forms of accident prevention. We do have six people at the CDC——

Senator MONDALE. What is that?

Dr. COOPER. The Center for Disease Control in Atlanta is involved in various facets of the problem. We have three people in the Environmental Health Division who are drafting model legislation, regulations, and suggestions for regulations at the present time.

We have seven people assigned to the National Park Service for working in this area, but again it is not only youth that is being addressed. We have three people in each region who cover the general areas of our service by CDC which in part devote some of their attention to these activities.

Senator MONDALE. Do you have one full-time person heading up this effort?

Dr. COOPER. We do not have a project leader heading it up as youth camp safety; no, sir.

Senator MONDALE. Would that not make sense?

Dr. COOPER. Well, I think right at the moment we have Dr. Lisella, who is in the audience here, who is directing full-time activity for model legislation development and for the programs that we are indicating that we will do.

So I think at a given time in the evolution of the program it would be appropriate to have somebody spending full time on it.

Senator MONDALE. Suppose you develop this model State law and the States do not choose to enact it; is there not an interstate national interest in this?

I assume that of the 7 million children who go to camps, a large proportion of them cross State lines so that while you might live in a State with a good camp law, your child might go to a State in which children are exposed to dangers where there are not adequate laws.

What do you propose to do in that event?

Dr. COOPER. The objective would be to get each State to respond.

Senator MONDALE. We are grown men. What if that does not happen?

Dr. COOPER. We would fall back at this point on the observation that the areas that need to be addressed for safety are already available in State law, that they could be enforced on that basis.

Senator MONDALE. I understand Dr. Cook has a statement for the record. We will just place that in the record.

Dr. COOPER. Dr. Cook was the investigator responsible for the primary survey contract and he is here today.

Senator MONDALE. I would hope that you would review your position again. I understand you work under constraints like all of us. Everytime we want to do something for kids, the Department always comes out against it, whether it is child abuse or sudden infant death—in practically everything we have wanted to do, they oppose it.

I sometimes wish we would get someone from the Defense Department in charge of your department—they always ask for more.

Dr. COOPER. We want to be responsible, Senator.

Senator MONDALE. You always ask for less.

Dr. COOPER. We do want to eliminate the idea that we are opposed to helping children.

Senator MONDALE. Oh, yes, they came out against child abuse too, but they did not want the law. As a matter of fact to be perfectly candid about it, up to this point the major contribution of the Department is to issue a report which downgrades the need for any action.

I do not know how accurate the report is.

Dr. COOPER. We do not really feel that the Department either has or it intended to downgrade the effort. I think the Secretary and the Department are aware that more needs to be done in this area. I think that some features of the proposed legislation that allowed us to reach this conclusion were unenforceable when we could come back in 2 or 3 years and we would not have been able to do a good job again.

Because I think the question of enforcement here is a major one and it is one that we would not want to undertake—a new program with new bureaucracy that would not be able to get the job done.

So I think we recognize the limitations of the study. We think there is a great deal of useful information on it. We think the hearings that you are holding and the publicity attendant thereto has done already a great deal to heighten the awareness throughout the country and to the States for the need for more effective activity in this area.

Indeed, we are willing to commit ourselves to do it, but we really do not think that some of the features that were mentioned in the testimony would help us do the job.

Senator MONDALE. You mean the law would not help you do the job?

Dr. COOPER. No. I think if you are asking us to enforce the law, I do not really think that we can deliver on that.

I think there are other experiences——

Senator MONDALE. Like what, OSHA, you mean?

Dr. COOPER. Yes; part of OSHA, yes, sir, as the most recent one.

Senator MONDALE. Do you not think OSHA has helped stir interest?

Dr. COOPER. Yes. I think there have been many facets of OSHA that have helped the effort, but the efforts I mentioned earlier—they have increased awareness, they have increased participation, and they have increased the development of criteria in that category.

Senator MONDALE. Well, thank you very much.

[The prepared statements of Dr. Cooper and Dr. Cook follow:]

FOR RELEASE ONLY UPON DELIVERY

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

STATEMENT

OF

DR. THEODORE COOPER

DEPUTY ASSISTANT SECRETARY FOR HEALTH

BEFORE THE

SUBCOMMITTEE ON CHILDREN AND YOUTH

COMMITTEE ON LABOR AND PUBLIC WELFARE

UNITED STATES SENATE

MONDAY, JULY 15, 1974

MR. CHAIRMAN AND MEMBERS OF THE SUBCOMMITTEE:

I am here today to testify on two bills related to Youth Camp Safety--S. 3639, the bill introduced by you Mr. Chairman and cosponsored by Mr. Ribicoff; and S. 1830, the bill introduced by Mr. Ribicoff. Youth Camp Safety has been of Congressional concern since hearings were first conducted by the 90th Congress. This subject raises issues in which the Department has a vital interest. For example, one of the six Public Health Service agencies within the Department, namely the Center for Disease Control, devotes much of its effort to the prevention of avoidable disease and illness; and this includes injury and death among summer youth campers. Public Health Service physicians and technical personnel have provided disease prevention services for several Boy Scout Jamborees. So we share your interest in understanding and preventing unnecessary illness, injury, and death among young people as well as in the entire population.

Historical Background

During the earlier Congressional hearings on summer youth camp safety, testimony was presented which suggested that there simply was no comprehensive information

available on serious and preventable adverse health incidents affecting summer youth campers and on laws pertaining to such camps. More particularly--the information available apparently did not permit the Congress to arrive at an informed conclusion concerning the necessity or suitability of Federal legislation on this matter. In an attempt to mend this deficiency, the Congress enacted P.L. 92-318, the Education Amendments of 1972, which called for the further study of summer youth camp safety and instructed the Secretary of the Department of Health, Education, and Welfare to make "a full and complete investigation and study to determine:

1. the extent of preventable accidents and illnesses currently occurring in youth camps throughout the Nation;
2. the contribution to youth camp safety now being made by State and local public agencies and private groups;
3. whether existing State and local laws adequately deal with the safety of campers in youth camps;
4. whether existing State and local laws relating to youth camp safety are being effectively enforced; and
5. the need for Federal laws in this field."

The legislation was enacted on June 23, 1972. It required a report from the Department including answers responding to the questions noted above, by March 1, 1973. Such a report could only meet this deadline if the data required were already in existence somewhere--and they were not. The summer camping season was already well underway by June 23 and no study of illness, injury, and death among campers could be mounted during the 1972 camping season.

The Public Health Service undertook its investigation of this matter upon the passage of the legislation. HEW staff did a thorough review of the literature, undertook discussions with State and local officials and with national organizations having knowledge of these matters. The result of this review by the Department confirmed that data currently available were incomplete. Further study was essential. Accordingly, a report was made to the Congress by the date specified--March 1, 1973. This report addressed the non-availability of data on preventable injuries and illnesses, reviewed existing literature on earlier studies pertaining to youth camp health and safety, summarized information obtained from State and local officials and public and private national organizations, and presented a plan for obtaining the information required in the legislation.

Since in the late summer of 1972 it was already evident that the Department could not answer Congress' questions with existing data, the Public Health Service took appropriate steps at that time to make all necessary arrangements for a study of illness, injury, and death among summer youth campers during the 1973 camping season. Furthermore, it moved to collect all laws and regulations pertaining either directly or indirectly to youth campers or the operation of such camps. The planning for this further study was carried out during the winter of 1972 and the spring of 1973. During the summer of that year two contractors and a subcontractor carried out the investigations. While the information gathering went smoothly, two circumstances delayed the prompt completion of the report:

1. The body of law and regulation gathered by the contractor required a more painstaking analysis than had been envisioned in the original contract. Accordingly, the contractor was requested to undertake this additional analysis--thus delaying a final report on law and regulation until early February of this year.

2. The injury and illness data emanating from the survey presented more analysis difficulties than had been anticipated. This contractor's report was also provided to the Department on about February 1.

The Department analyzed the data and prepared the report which was transmitted to Congress April 29.

FINDINGS - YOUTH CAMP SAFETY STUDY

Now I would like to recapitulate the findings produced by this study:

1. The rates of severe injury and illness among campers attending the approximately 200 camps were low--0.1 per 1,000 and 0.3 per 1,000 camper days, respectively. No deaths were reported in these camps. Moreoever, severe injuries, illnesses and deaths occurred with lower frequency among youngsters attending these 200 camps than occurs among this age group in the national population at large.
2. A mail survey and other sources of information identified 25 deaths among campers attending camps which were not part of the survey.

3. Undoubtedly, some of the severe injuries, or illnesses and deaths noted above were preventable.
4. No systematic reporting mechanism presently exists which provides reasonably complete information on the occurrence of severe injuries or illnesses and death associated with youth camps.
5. Twenty-eight (28) States have laws and regulations specific to youth camps. Of these, only four were judged to have adequate legislation and regulation coupled with a regulatory requirement for the annual inspection of summer youth camps.
6. The enforcement of existing laws and regulations on summer youth camps is deficient.

We recognize that the results of the survey of illness and injury may not be entirely representative of all camps. Of the 200 camps constituting the initially selected sample, only 128 actually participated. Some of those not participating indicated a simple unwillingness to participate while others lacked the required time or staff to do so. Still others had to be dropped because of early closing dates and others did not meet the specifications

established for residential youth camps. While replacement camps were drawn in a statistically random fashion, the total sample is in fact a selection of voluntary participants. Thus, the statistical design does not allow us to conclude that the findings are necessarily applicable to all camps.

I mentioned earlier that the illness and injury rate among the campers studied was very low--namely .1 and .3 per 1,000 camper days. It is also true that the 25 deaths identified during the past season clearly indicate that camping is sometimes accompanied by tragedies for campers and their families. Those deaths must be evaluated with two facts in mind:

1. The information on camper deaths came from sources which might be expected to report all camp deaths but may have missed some.
2. The number of deaths reported, 25, is about one-half the number which would have been expected, given normal mortality rates for this age group in the national population at large.

The Department recognizes that the nature and extent of serious and preventable illness and injury and also death among campers is not fully understood since there is no monitoring system which reliably identifies these events. Nonetheless, the facts which are now available suggest that some action should be taken--even one camping death or serious injury is too many. We believe that the States, camping organizations, parents and youth groups, and the Federal Government should devote their respective efforts to promoting the health and safety of our youth campers.

Brief Description of the Bill

The Children and Youth Camp Safety Act, S. 3639, directs the Secretary of Health, Education, and Welfare to develop and promulgate youth camp safety standards. It provides for Departmental review of such plans and approval of State plans which are at least equal to Federal standards and which provide for the enforcement of such standards. Grants, up to 80% of eligible costs, are authorized to be made to States with approved plans. The Secretary would be responsible for enforcement of youth camp safety standards in States without approved plans. Camps would be required to report annually to the Secretary all accidents resulting in death and serious injury and illness. The Secretary would be responsible for

the enforcement of Federal standards in travel camps. The legislation also directs the Secretary to develop and enforce safety standards in all Federal recreational camps. U. S. District Courts would have jurisdiction to restrain dangerous practices in youth camps. Finally, the bill provides for the establishment of an advisory council on youth camp safety to be chaired by the Secretary.

A similar bill, S. 1830, the Youth Camp Safety Act, directs the Secretary to establish and publish youth camp safety standards. It also provides for a Departmental review and approval of State plans for implementing these safety standards. Grants, up to 50 percent of eligible costs, but not to exceed $50,000 for any one State, are authorized to be made to States who apply and whose plans are approved. The bill also provides for the establishment of an advisory council. The major differences between this bill and S. 3639 are that S. 1830 contains no provision for direct Federal enforcement of safety standards and for reporting of accidents resulting in death and serious injury and illness; nor is there any provision for restraining dangerous practices in youth camps.

The Administration's Position on the Bills

The Department's reaction to the provisions of S. 3639 and S. 1830 is an outgrowth of its appreciation of the severity of the problem, its views of the steps that should be taken

to deal with the problem, and its judgments as to where responsibility lies for dealing with the problem.

Our study indicates that the death rate among summer youth campers is half that for the same age group in the population at large and that the injury rate is low. We believe that the incidence of death and injury in camps ought to be reduced to the lowest possible level. Moreover, we feel that these problems should be seen as one portion of the larger issue of accidents and their prevention. The occurrence and prevention of accidents has been a subject of Public Health concern for a good many years.

As you know, Mr. Chairman, Public Health is largely a matter of State responsibility; it has been so for many years. If one reviews the provisions of S. 3639 and S. 1830, it is evident that the functions in question are State Public Health responsibilities. States do enact Public Health legislation, promulgate regulations, set standards, enforce the requirements, inspect to ensure compliance, exact penalties, and react to imminent dangers to health and safety. The States have performed such functions in regard to public facilities which most resemble summer youth camps; namely, hotels, motels and restaurants. Furthermore, water quality, sewage disposal, food handling, fire safety--all matters germane to summer youth camps--are now responsibilities of State and local government.

We view youth camp safety as a responsibility of the States, accordingly, we oppose enactment of S.3639 and S.1830. The Department stands ready, however, to render requested technical assistance in several areas to States, other Federal agencies which control Federal land used for camping purposes and to national camping associations. Accordingly, the Department is now developing model legislation and regulation for adoption by States. It will encourage States, through the Council of State Governments and other means, to adopt such legislation and regulation. If requested, the Department will provide technical assistance to States for the development of procedures to monitor serious illness, injury and death among summer youth campers. It will provide consultative services to Federal agencies administering facilities used by the public for camping. It will also provide consultation to States and national camping organizations when the required consultation can best be provided by the Federal government. All of these technical assistance and consultative services can be offered without additional legislative authority or funding.

The institution of monitoring, the elucidation of causal relationships, and the enactment and enforcement of legislation by the States have had salutory effects in the prevention of other health problems. I feel certain, Mr. Chairman, that comparable gains can be made through similar means in regard to the health and safety of summer youth campers.

Conclusion

To summarize, the Department does not consider that Federal legislation is needed with regard to summer youth camps. Existing statutory authorities are fully adequate to enable us to institute measures to help guide the States in developing their proper lead role in assuring the health and safety of summer youth campers.

Mr. Chairman, we will be pleased to respond to any questions which you might care to raise at this time.

STATEMENT OF CENTURY RESEARCH CORPORATION
TO
SUBCOMMITTEE ON CHILDREN AND YOUTH
OF THE
COMMITTEE ON LABOR AND PUBLIC WELFARE
UNITED STATES SENATE
CONCERNING THE YOUTH CAMP SAFETY STUDY

Presented July 15, 1974

Mr. Chairman and members of the committee, my name is Kenneth G. Cook. I am a Vice President of Century Research Corporation of Arlington, Virginia and am licensed as a research psychologist in Virginia. I was a principal investigator on a survey study related to the subject of this hearing.

Century Research Corporation was established in 1952 by Dr. Robert B. Sleight, its current President, to provide research and consulting in the behavioral sciences including human factors engineering, personnel psychology, market research, and consumer psychology. Since its founding 22 years ago, much effort of the organization has concentrated on safety research and we have conducted major projects in air and highway safety and in occupational health and safety.

In the Spring of 1973, Century Research Corporation joined with the National Recreation and Park Association in submitting a proposal to perform studies to assist the Secretary of Health, Education and Welfare in tasks directed by Congress in Title VI of the Education Amendments of 1972. This was a competitive bid with the award based primarily on the technical merits of the proposal. This was a cost plus fixed fee contract and the award was for $187,542. Of this, the National Recreation

and Park Association was awarded $39,482 and data processing by Action Data Processing, Inc. of Silver Spring, Maryland was $8,915.

The principal method used was a sample survey of youth camps from which reports permitting an estimate of the number and nature of medically attended camping injuries and illnesses for one camping season were obtained. In addition, information was gathered on health and safety conditions and other characteristics of the camps included in the survey sample. The National Recreation and Park Association, as a subcontractor to Century Research Corporation, was given the task of providing information concerning the contributions to camp safety by various agencies and organizations and the adequacy and effectiveness of State and local laws and regulations pertaining to youth camps.

I should like to spend a few moments elaborating on the sampling methods to identify the camps which were requested to participate in this study. Government statisticians consulted a number of sources to prepare a list of 5293 youth camps throughout the 48 contiguous states. These were assigned to camp clusters on the basis of their postal zip code. They tried to arrange clusters so that camps in a cluster were no more than 50 miles apart. The country was then partitioned into four geographical areas--Northeast, Southeast, North Central, and West. Five camp clusters were chosen in random fashion for each of the four areas by assigning random five-digit numbers to each cluster, ordering these numerically, and selecting five numbers randomly from within that ordering.

The chosen clusters are identified by referencing them to a community near the center of the cluster. These are:

Olympia	WA	St. Louis	MO
Denver	CO	Waukesha	WI
Abilene	TX	Manitowoc	WI
Huntsville	TX	Grand Rapids	MI
Little Rock	AR	Flint	MI
Macon	GA	Somerville	NJ
Savannah	GA	Monticello	NY
Hampton	SC	Poughkeepsie	NY
Lakeland	FL	Hillsboro	NH
Norristown	PA	Portland	ME

Century Research Corporation employed Field Representatives who, in most cases, lived near the chosen cluster areas to service the camps in the cluster.

These Field Representatives were well-qualified to perform their duties. All but two had at least a bachelor's degree; one had his doctorate and four others had master's degrees. The two representatives with with less than a bachelor's degree were undergraduate students, one with previous survey research work experience. Twelve of the representatives were teachers, one at the college level. Six were graduate level students including one medical student and one law student.

These Field Representatives were supervised by regular staff of Century Research Corporation all of whom have advanced academic degrees and survey experience. They made personal visits to the Field Representatives and accompanied them to many of the surveyed

camps for an "on-site" view of the camp, its operation, and the representative's methods in obtaining the forms required in the survey.

The first task of the Field Representatives was to make a preliminary check on the camps in the cluster to see if the camps existed and were actually camps as defined by the study, that they were physically located in the cluster area, and that they would be operating in the summer of 1973. The Field Representatives were asked to add the names of any additional camps found in their area that were not on their lists. They eliminated camps which were on their list but were not operating or not in their area. These adjusted camp lists for each cluster were then arranged alphabetically by camp name, ordered numerically by this number. The first 10 camps in the each cluster were considered to be the primary sample and were the first to be contacted. If substitutions were required, they were made in order from the camps listed after the first 10.

Of the 200 camps in the primary sample, 128 were surveyed. Only 27 camps refused to participate for various reasons; six other camps were dropped by us when it was found that they were not providing the promised data. Of the remaining 38 camps in the primary sample, 13 were not youth camps within the definition of the study; three could not be located, five were physcially located outside of the defined cluster area. Eight

were closed for the season and five more closed soon after the initial contact and hence we had insufficient data from them. Several camps, either in the primary sample or in the substitution lists, were listed as separate camps but proved to be functionally divisions of camps already considered.

Five survey forms were used for data collection. These were designed by staff in the Department of Health, Education and Welfare, reviewed by consultants, field tested briefly by the American Camping Association and revised as necessary.

The camps participating in the survey were mostly large with a median capacity of 165 campers although 22% were under 100 in capacity. More than half of the camps were accredited by some camping association and of the accredited camps, 80% were accredited by the American Camping Association.

Most camps were required to have some kind of license or permit, but about one-fifth to one-third of the camps, depending on the section of the country, said they were not required to have permits. Frequently permits are issued which do not require inspection, but about half to three-fourths of the camps did require one; in states with laws specifically regulating camps, nearly all camps said they needed to be inspected before being issued a permit.

In camping, the counselor and specialist positions are important. These are the people who work directly with the campers and are in the position to teach and to enforce safety and health rules. They also have latitude to make decisions on activities that could lead to a potentially dangerous situation.

Minimum qualifications for counselors varied greatly but may be summarized as follows:

Four out of ten camps specifically indicated that their counselors and specialists must be 18 years of age or older. Many of these stressed that this was a minimum. In some camps with this minimum, the counselors were all older than this.

A third of the camps require counselors to be college students or graduates.

Almost a third of the camps specifically indicated that they require previous counselor or camping experience or training.

A quarter of the camps require experience related to their camp task, for example teaching experience if they are to conduct a class.

About 15% of all camps required a certification in first aid or some other area.

One-quarter of the camps specified such personal qualities as being responsible, of good moral character, mature, and so forth.

One of six camps indicated that they require the counselors to attend one week or more of pre-camp training.

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The most usual arrangement for health care at a camp is to have a registered nurse in residence and a medical doctor on call. Over 90% of the camps had an infirmary; bed capacity was less than 10 in 80% of these camps.

There were 4150 injuries reported, but there were only 54 that could be considered "serious" when seriousness is defined by being hospitalized, being sent home, or receiving a partial permanent disability. The overall frequency rate was approximately 5 to 6 per 1000 camper days; the rate for "serious" injuries was less than one per 10,000 camper days. To help understand the rate for the more serious injuries one may consider the implications in some hypothetical situations.

1. In a group of 10 camps having 150 campers and seasons of 10 weeks, 7 of the camps would experience an injury with the seriousness of a fracture or severe laceration.
2. Over a period of 10 years, a camp of 150 campers with a 10 week season would experience an injury of the more severe kind in seven of the years.
3. If the camp's season were only 5 weeks long (which was a more common season length than 10 weeks) then it would take 20 years to experience 7 injuries of the seriousness found in this study.

In considering factors involved in safety, however, one may not be concerned so much about averages which is what this rate is, but with extreme conditions. These average rates are of little meaning if there is a camp which, through lack of proper supervision, poor facilities, or lack of appropriate protective gear or safety equipment, is providing a dangerous situation for the campers.

Falls accounted for the greatest number of injury reports in which a type of incident was reported. They were involved in 23% of the "not serious" injuries but in over half of the serious injuries. Falls on the same level outnumbered those from an elevation, but falls from an elevation constituted 40% of the serious injuries and only 8% of all injuries in which an incident was reported. Although there were 10 cases of snake bite, only one was serious. A 15 year old girl was bitten by a copperhead as she stepped out of her tent late at night. The other snake bite incidents involved nonpoisonous snakes usually being kept as pets or in attempts to catch them.

Many of the incidents in which campers stepped on nails, debris, or sharp rocks resulted from not wearing shoes or from improper footwear such as sandals while walking or hiking over rough ground. Similarly, improper footwear accounted for many of the cases of blisters--ill-fitted shoes, lack of socks, wet tennis shoes, and sandals worn in inappropriate situations.

Horses accounted for 12 animal bites and there were eight cases of human bites, usually sustained in fights or emotional

outbursts. Horses also kicked or stepped on 42 campers, but only one of these injuries could be considered serious. These incidents combined with the many falls from horses would indicate a need for care when relatively inexperienced campers are too near horses.

Walking and running and playing in competitive sports were the most frequent activities at the time of injury. However, in the group of serious injuries, the most frequent activity was reported to be horseplay and fighting with just over one-fifth of the serious injuries occurring in this activity.

The frequency rate for illness reports was between 9 and 10 per 1000 camper days. Of over 7000 such reports filed, there were 216 that could be considered more serious because they resulted in hospitalization, going home, or laboratory tests. Most of these involved some form of upper respiratory infection or inflammation. There were a few cases of childhood diseases and three cases of known appendicitis.

Inspections of camps by sanitarians revealed them, for the most part, to be clean and relatively free of hazards. Chief among the items of possible improvement was the provision of fire protection. Here again, however, it should be pointed out that the average is not so important as the extremely poor and unsanitary camps.

In summary, we believe that the findings of the Century Research Corporation report can be interpreted either for or against Federal legislation of youth camp safety. In part, it

depends upon the question asked. When one asks whether State and local laws regulating camp health and safety are adequate and enforced, the answer must be a firm "no" since they are frequently lacking enforcement or do not exist. However, when one asks whether Federal legislation would significantly reduce the frequency and severity of camper injuries and illness, then the answer also seems to be "no" because responsible agencies and organizations and camp operators have for years been improving their own rules and regulations to protect the health and safety of campers.

It may well be that enforcement is not as necessary as is education. Such education may be in direct advice and training in health and safety to camp operators or in college and in-service training subsidies. There would appear to be a need to provide systematic training to counselors and a need to provide materials to promote health and safety among all camp operators, but particularly among operators outside of organizations that already provide such materials.

Kenneth G. Cook

Dr. Cook received his B.S. and M.S. degrees in industrial psychology from the Pennsylvania State University and the Ph.D. in psychology from the American University in Washington, D. C.

While at the Pennsylvania State University, he designed and conducted a study of community attitudes toward banks, a summary of which was published by the Pennsylvania Bankers Association. He also directed analyses of depth interviews, and has been an interviewer for both structured and motivational type questionnaires. At the Chrysler Corporation, Dr. Cook assisted in establishing a new personnel administration department in the Comptroller's Staff. During army service he was a survey research specialist with the Personnel Management Branch of the Adjutant General's Office, in which capacity he was responsible for all phases of attitude and opinion research from study design through final report writing. Following his army service, he joined the civilian staff of the Personnel Research Branch of the Adjutant General's Office as a statistical research associate, providing advisory services on experimental design and data analysis to research psychologists working in the general area of selection and evaluation problems.

At Century Research Corporation, Dr. Cook has designed sample surveys and attitude assessment techniques for studies of interprofessional relations in medical specialties, lay and clerical relations in administration of church operated hospitals, and studies of aircraft pilot knowledge and beliefs regarding collision threats. He contributed to the design, interviewing, and data analysis of studies of miner health and safety attitudes, has managed the initial stages of a survey of driver licensing practices, and supervised interviewers studying unit pricing in super markets. His own interviewing experience ranges from simple household surveys to in-depth motivational, dynamic interviewing. He has also conducted training sessions for interviewers and provided consultation on interviewer training.

Dr. Cook is a member of Phi Beta Kappa, Phi Kappa Phi, Psi Chi, Eastern Psychological Association, District of Columbia Psychological Association, Human Factors Society, American Association for the Advancement of Science, and Divisions 8 (Personality and Social Psychology), 14 (Industrial and Organizational Psychology) and 21 (The Society of Engineering Psychologists) of the American Psychological Association.

Senator MONDALE. Our next witness is Carole Walega of Sterling, Va.

We are very grateful to you for being with us this morning. I understand this is your first experience to testify. Do not worry, we will not bite.

If you will just read your statement.

STATEMENT OF CAROLE H. WALEGA, STERLING, VA.

Mrs. WALEGA. My name is Carole Walega. I am a resident of Sterling, Va. I would like to relate to you my reasons for feeling the urgent need for Federal safety standards in youth summer camps.

My 4-year-old son was in attendance and under the supervision of a summer day camp in Fairfax County, Va., at the time of his death.

On the morning of July 3, 1973, I took my son to the pickup site for the camp and continued on to work. He was then taken by a camp bus to the campsite, which is also a private school for nursery to third grade during the school year.

At approximately 9:20 a.m., I was notified, as was my husband, by the director of the camp that something terrible had happened to Teddy and that I should come to Fairfax Hospital.

Upon my arrival at the hospital, I learned that my son had been killed in an accident at the school. My son was run over and killed by a small ride-on lawnmower.

The details from this point on are unclear as the persons involved in this have refused to speak about the incident beyond the initial police investigation.

Apparently my son was allowed to play, along with other children, in a fenced area supervised by two teenage counselors at the same time that area was being mowed by the school's maintenance man. As we understand the accident, my son lost his footing in the damp grass and fell in the path of the machine and received a fatal blow to the head. The operator of the mower was unable to stop the machine in enough time to prevent the machine from running over my son.

My husband and I, as I am sure you do, feel this accident was a completely avoidable one. We have a tremendous concern to see that this type of accident, or any type for that matter, to a child does not occur again.

It is obvious to me that the camp did not feel that complete safety precautions were necessary for my son or any of the other children at the camp. The county of Fairfax and the Commonwealth of Virginia do not feel that the camp was in violation of the laws licensing it. Obviously not. How can one violate a law when there is none?

There is no law which adequately protects our children.

Senator MONDALE. Thank you very much for your statement. I am sure that it is difficult to come and testify on something as tragic as this.

Tell me, in finding a day camp for your son, how did you look for one?

Mrs. WALEGA, I tried to find one that was located close to my work so that if any accident should occur, I would be able to get there in time to do something for my son, or if he were to become sick or frightened, I would be able to take him home easily.

Senator MONDALE. What was the name of this camp?

Mrs. WALEGA. The Creative Country Day School.

Senator MONDALE. Is it a private camp?

Mrs. WALEGA. Yes.

Senator MONDALE. Did others in your community send their children to this camp?

Mrs. WALEGA. Yes. Several of the people I worked with had their children there.

Senator MONDALE. Was it a camp that had been in being for some time?

Mrs. WALEGA. Yes. It is still in being.

Senator MONDALE. Was there a lawsuit that followed this?

Mrs. WALEGA. Yes, sir.

Senator MONDALE. Is that underway now?

Mrs. WALEGA. It is in the process of being settled.

Senator MONDALE. I see. I think that you indicated that apparently the State of Virginia, county of Fairfax, to your knowledge does not have camp safety laws.

Mrs. WALEGA. No, they do not seem to. They have regulations concerning the standards of water and food service, and this type of thing, but they have no laws that regulate supervision.

Senator MONDALE. Did you look into what kind of supervision they were having at this time? Do you know what kind of supervision did exist at the camp at the time this tragedy occurred?

Mrs. WALEGA. As we understand it, there were two teenage counselors in the area that my son was playing in. Other than that, I am not sure of the overall supervision. It is a very unclear circumstance.

Senator MONDALE. Was an adult operating the lawn mower?

Mrs. WALEGA. Yes. He was a gentleman in his fifties.

Senator MONDALE. Well, thank you very much for this personal recital of that tragedy. It will help us very much in our work.

Mrs. WALEGA. You are very welcome.

Senator MONDALE. Our next witness is Mitch Kurman of Westport, Conn., an old hand in this field.

STATEMENT OF MITCH KURMAN, WESTPORT, CONN.

Mr. KURMAN. Chairman Mondale, Senator Ribicoff, and members of the Subcommittee on Children and Youth, thank you for the invitation to speak here.

S. 3639, Children and Youth Camp Safety Act, will benefit the ailing youth camp industry by making it a better, more wholesome one for children, parents, camp personnel, and management.

The purpose of the bill, and my only interest in it, is safety.

Safety is a goal all support and none oppose. However, in four congressional sessions it has not been achieved. All who testified favored the bill. No witness spoke against it. The only small group which has been very outspoken in its opposition to the bill declined an invitation to testify. A closer look is needed for a realization of the problem and how to solve it.

There are individuals in the camp field who are unscrupulous and selfish. Such people can be found in every field. However, the usual business adjustments cannot be made on a child who is crippled, blinded, brutally beaten, sexually abused, or killed.

Incidentally, I have got records of every bit of that.

Camps are an unusual business. Their commodity is our most precious possession.

Camps that shortchange the public on personnel, food, and equipment will have to comply with basic standards. It is easy to incorporate standards that require proper personnel in dangerous areas—that is, Red Cross water safety instructor—meals planned for nutritional value, roped off swimming areas, proper electrical wiring, and so forth.

Hazardous industries have succeeded in reducing injuries and fatalities by incorporating and enforcing meaningful safety standards. The camp or organization name is not a substitute for needed meaningful legislation properly enforced.

Safety will not detract from the program or the philosophy of the camp. Groups engaged in activities and trips which push and test their members to their utmost abilities and give them a pride in achievement will still pursue their programs as long as they comply with safety standards. One such group is Outward Bound, and they learned the hard way that life preservers, hard hats, proper gear, and leadership are necessary to fulfill their tasks.

I was with those people, and they admit to six deaths in their group before they finally got around to everything that should be done.

The Boy Scouts testified for this bill, but in some previous testimony they said they feared Federal regulations. This bill is not meant to regulate anyone. They can continue as before as long as they comply with basic safety standards which they say they favor anyway.

The YMCA preaches "safety" throughout their literature. This legislation will insure that they live up to it.

I mentioned the "ailing camp industry" in my opening statement. That is not a flippant remark.

Regarding personnel, many camps still had positions open for counselors, including key waterfront and trip leaders, according to ads as late as July 14.

With the tight job market among college students, many of whom qualify, the reasons might be enlightening.

There is something wrong when youngsters are packed into an ancient multiple-story resort hotel without fire alarms, fire escapes or emergency exists. This resulted in tragic deaths at Tamarack Tennis Camp, Franconia, N.H., July 16, 1971, and at other camps in New York, Pennsylvania, and elsewhere.

As a side remark, I would like to say, in one case of a fire down in Pennsylvania, when reporters went down, they were chased away by the camp operator who did not want any publicity.

It is wrong to transport 62 children and 8 leaders on a rented open flatbed tractor trailer truck for a 200-mile round trip on a high-speed expressway driven by a young counselor.

Five were killed, and all were injured, many seriously, from the Berkeley, Calif., YMCA Day Camp at Fremont, Calif., August 5, 1967.

My check for an official report of this accident was returned to me by California authorities with the notation that this information was not available to the public.

As a side remark, I would like to say how in the world can the public determine a camp, since they use the same brochures, and you cannot get the information.

It is wrong to entrust children from Long Island for a trip to the Pennsylvania Dutch countryside in a bus with faulty steering and a driver whose license had been revoked for previous violations.

Seven were killed and 52 injured from the Hillel Country Day School (day camp), Lawrence, N.Y., at Allentown, Pa., July 16, 1970. Charges against the bus company and the driver were later dismissed.

I have many other records in my files of camps using very old vehicles and employing drivers without licenses which resulted in many injuries.

It is wrong to have a youngster on a rifle range with a 15-year-old part-time dishwasher, rifle range instructor, and jack-of-all-trades in charge. The camper was shot in the abdomen when the instructor tried to help him with the jammed gun. This took place at Pakataken Camp, Andes, N.Y., July 23, 1973.

It is wrong to allow campers to float down a swift river in inner tubes with counselors who are untrained in lifesaving and resuscitation techniques.

I quote from a letter I received from an attorney in Tuscon, Arizona:

"My client's daughter was in an Arizona summer camp and was taken 'tubing' down the swift Gila River. The children were not given life jackets. The child got caught in a fallen tree in the water and began to drown. There were several counselors nearby who did nothing. When I asked the counselor what she had done upon seeing the girl drowning, she answered, 'I screamed.' When asked what she had done after that, she replied, 'I cried.' I asked the counselor if she gave the child mouth-to-mouth resuscitation when she was finally brought to land, and she told me, 'No, I did not know how,' The child died."

Our values need reorganization when the camp's public image takes priority over children.

The examples I cite are ghastly, and there are far more.

On July 6, 1971, 15 children were left with a 15-year-old counselor-in-training at Camp Mataucha, operated by the YMCA of Watertown, Conn. The youngster in charge used a hoe handle as a bat to strike the eye of a camper and blind him. After being ignored for 8 months by the Y, the boy's parents filed suit. Only then did the Watertown, Conn., YMCA file a report of the accident with the State health department.

The law requires filing within 48 hours, but there is no penalty for late filing.

A Boy Scout developed a cramp and drowned while swimming at a Scout camp at Hales Corners, Wis., June 30, 1963.

The Boy Scout public relations issued a statement that he "fell off the raft and drowned."

In a court of law, years later, it was admitted that he had developed a cramp and drowned due to poor supervision and lack of competent waterfront personnel. No one came to his aid when he cried for help.

Scout public relations scored first when it was news, and the legal proceedings never caught up.

An Albuquerque, N. Mex., Boy Scout troop was taken up to Utah's treacherous Green River at Desolation Canyon, June 28, 1971. Utah law requires all to have their equipment checked before running this dangerous river. The troop leader ignored both the law and warnings of others on the river.

Every one of the small rubber rafts capsized, and Scout Edwin McCarthy drowned.

Strangers between 40 and 50 miles down river saw his body floating and notified authorities. Army helicopters, in a massive search, located the survivors huddled against the canyon walls. Some of them were hysterical after a 2½-day ordeal. They feared no one would find them. A fresh rainfall could have wiped out the troop.

It is something like 3,000 feet deep, and once you are in it, you cannot get out of it.

The Deseret News and other Utah papers denounced the venture as poorly planned.

Utah officials also condemned the trip and said the rafts were too small for that river.

The Scout public relations sent out a story describing how "Scout McCarthy died to save the life of a buddy."

No mention was made of the poor leadership and lack of proper equipment.

In July 1973, an Explorer Scout troop from Albuquerque, N. Mex., was taken to Yellowstone, Wyo. In spite of the park ranger's warnings that Yellowstone Lake is a frigid glacial body of water subject to very severe sudden storms, and to avoid it, or stick very close to shore, the group set out on the lake in canoes.

When they were a mile from shore, a storm hit, swamping the poorly designed, poorly constructed homemade canoes. Four died, including the two leaders. One leader died trying to clutch a rotted lifejacket only large enough to hold a 50-pound child if in good condition. His body was never found.

The explanation of Scout officials to inquiries was that it was an act of God as the boys died in a winter storm of exposure. This happened July 18, 1973.

Senator MONDALE. I come from an area where we are quite familiar with canoes; and we never take a canoe out in open water. You are crazy to do it.

Mr. KURMAN. At Camp Natticook, a private camp on Lake Natticook, N.H., a motorboat towing a water skier plowed into some swimmers from a Y camp sharing the same lake. There were injuries and one death.

Certainly, a water ski boat should be under control at all times and have proper observers.

The Y camp should have roped off their swimming area to keep boats out.

All at Camp Natticook were warned to tell no one of this tragedy.

Long after the season ended, a mother finally got the story from her troubled child.

Jack Dempsey, of WNYR Radio in Rochester, N.Y., called me to hurry to Rochester in August 1969. A 12-year-old boy had been brutally beaten and sexually abused by four older boys for 4 consecutive days at a Scout camp near Tupper Lake, N.Y., operated by a Rochester troop.

The child begged, cried, and pleaded with those in charge to put a stop to his ordeal, but he was ignored.

The examining doctor called it one of the most vicious beatings he had ever seen.

After studying the other cases I have, Jack was sure it was not an isolated incident. His hard-hitting editorial won him an Associated Press award.

The police involved were disgusted. They wanted to help get the needed camp safety legislation.

They convinced Ron Robitaille of channel 10 TV in Rochester to discuss camp safety with me. I merely said there are good and bad camps, but the name or the organization does not mean much, and parents cannot determine a safe camp without the needed camp safety legislation.

A grand jury at Canton, N.Y., returned a six-count indictment against the Scout council, charging sodomy, assault, and endangering a minor.

Four months later, the district attorney's office wrote me that Judge Edmund P. Shea dismissed all charges against the Scout council, ruling "A corporation cannot be given legal custody of a child."

Lawyer friends advised me there is no question of custody. In the absence of a camp safety law and with such local interpretation, what incentive is there to compel the use of proper personnel and equipment? There is nothing.

In a case I know intimately, youngsters were taken away from Camp Gorham—sponsored by the Rochester, N.Y., YMCA—on hiking and canoe trips. In July 1965, the leader took the group of boys down very dangerous rapids on the Montreal River in Canada in spite of warnings from personnel at a hydroelectric plant on the river. Two canoes were badly damaged and some injuries were sustained.

A call was made to my wife, Betty, to advise that our son lost his clothing overboard. If she wired them money, his belongings would be replaced. They said David was all right. She was told the next trip was to Maine where they assured her they knew the waters and there was no danger. David's letter, describing the canoes capsizing in the rapids, did not reach us until after he died.

The first day in Maine brought a call from Weldon A. Hester, director of camping for the Rochester, N.Y., YMCA. "Mrs. Kurman, David is missing. You realize it is only because he disobeyed instructions."

An immediate trip to Maine revealed the lie.

The Great Northern Paper Co., situated on the west branch of the Penobscot River in Millinocket, Maine, will not permit their own employees—with far superior boats, equipment, and knowledge of the river—on this stretch of water.

A portage trail built by the company to avoid the rapids was not used by the leader. He did not know it existed.

The leader had also been warned by a forest ranger not to use that river, but he paid no heed. He smashed his own canoe and was stranded downriver on a rock.

The canoe with our boy was swept into the current and smashed, injuring one boy, and our son was lost and presumed drowned.

This was hardly the information the Rochester, N.Y., YMCA gave out.

The Great Northern Paper Co. did everything to help, at considerable trouble and expense to themselves. They shut down a huge operation of 2,000 men working around the clock, and sent out special crews who risked their lives. They succeeded in finding our boy's body after 3 days.

The camp did nothing other than try to protect its image.

The camp personnel who flew into Maine from New York did so to get the leader out of there. They permitted him to continue as though nothing had happened on to New Hampshire to climb Mt. Washington.

He risked lives again when he led the boys on a trail that was considered too dangerous by the Appalachian Mountain Club.

To change leaders would be an admission of guilt. After 6 years the facts were proven in court. Chief Richard Rideout of the Millinocket Police Department, Deputy Sheriff Joe Bartlett, Peter Pray of the Great Northern Paper Co., Gary Lack who survived in the smashed canoe, and Robert Weisman who also was on that camp trip all testified for us. The Y did not produce a single witness. To sum up the facts: The river was too dangerous, the boys had the wrong-type canoes and no safety equipment, the camp director had never been to Maine, the leader was unfamiliar with that river and would not listen to warnings of local officials. This should have led to an improvement of equipment and leadership on all other similar trips undertaken by all Y camps, but it did not.

This brings me full circle to the tragic deaths of two 15-year-old boys in August 1969 on a canoe trip with Camp Menogyn sponsored by the Minneapolis, Minn. YMCA on Rainy Lake in the boundary wilderness area between Minnesota and Canada. Five campers and one leader took two canoes with one life preserver per canoe. Rainy Lake is huge, possibly 15 miles wide by 45 miles long. A storm arose causing both canoes to capsize. One boy drowned and was never found; the other drowned and his body was found later. The reports of the Ontario Provincial Police and of the Minneapolis, Minn. YMCA are different in very important respects.

The Ontario Provincial Police report made the following comments about this tragedy:

1. When the group started the canoe trip, they were to travel due east. Although they had no way of obtaining the exact weather forecast, they did observe very strong winds blowing from the west. Commonsense should have indicated to the group leader that the winds would intensify when they reached the large body of open water with accompanying high waves. He should not have started the trip.

2. Although Canadian law does not require lifejackets in canoes, it certainly makes sense to have one for each person in the group when they expect to travel on large stretches of open water. Each person should put one on whenever the weather and water get rough. Since this group only had two lifejackets, the two weakest boys should have

been instructed to put them on. Also, some of the boys, including one of those who drowned, were wearing boots weighing 10 pounds. The boys should have been trained to remove these when paddling in rough water.

3. Two of the boys swam away from the capsized canoes. Miraculously, both of them reached shore. However, their attempts to get help for the others was unsuccessful. A strict rule of canoeing safety states that all persons should stay with the canoe when it capsizes. Since these two boys were obviously very strong swimmers, they may have been able to help support one of the boys when he became weak and went under. More than likely they would have been able to rescue the other boy who was hit by a big wave just as he reached shore.

The report concluded that this trip did not have proper and adequate planning for the type of water and weather conditions.

The report prepared by the Minneapolis, Minn., YMCA made the following comments:

1. Lifejackets are only issued to nonswimmers or poor swimmers. One lifejacket was put in each canoe to be used as a cushion for the boy sitting in the bottom of the canoe. All the boys were tested and judged good swimmers. Neither Minnesota nor Canadian law requires lifejackets in canoes.

2. When the trip started in the narrows, the weather was not a concern. Two hours later in open water it was a severe storm. The course was changed from east to north, and the canoes swamped after that change in course.

3. Camp Menogyn will reexamine all policies relating to safety both in camp and on the trail.

Once again the YMCA will not admit to error and will not use lifejackets if they are not required by law.

The American Camping Association has testified over and over again that they favor passage of the Federal Youth Camp Safety Act. Yet Ernest Schmidt, their executive director, has accused me of "sloppy research" because he claims that some of the accidents I have cited involving camp vehicles are "traffic accidents" and not really "camp accidents." If they involve open trucks, vehicles in poor condition, or drivers without licenses or proper training and experience, then the fault lies with the camp. Only an accident due to causes completely beyond the camp's control—such as another driver's fault—can be called a "traffic accident."

The recitation of this very small fraction of camp tragedies is not a ghoulish attempt to entertain or shock. All the injuries and deaths can be reduced greatly. Every case cited is a lesson if we care to use it and learn. After Connecticut enacted a life preserver law, fatalities dropped from 24 to 11 the first year.

The national boards of the Boy Scouts, YMCA, American Camping Association, and other camp-sponsoring organizations all support the enactment of the Federal youth camp safety bill. I take them at their word for they may realize that they are powerless to impose standards on their local affiliates without the authority of legislation. I welcome their support regardless of what some individual within their organizations may say. Constructive criticism will achieve the desired results; the "public relations" of the past has failed our children.

I also wish to mention other organizations that have no connection with camping that favor passage of this bill. The most recent ones to express support are the National Parent-Teachers Association, the National Council of Salesmen's Organizations, and the Communications Workers of America. All the above-mentioned organizations represent a wide spectrum of the American public. This bill is needed and will help all.

Senator MONDALE. I have read ahead of you, and I have read the examples. I think they all prove the same point. You spent several years on your own development of evidence and tried for years to get the States and the Federal Government to act.

As you say, it has been a very disappointing effort up to this point.

Mr. KURMAN. Right.

Senator MONDALE. You heard representatives of the Department testify here earlier?

Mr. KURMAN. Yes, sir, I did.

Senator MONDALE. You may be familiar with the statement which they submitted to the Senate, to the Congress, indicating there is not very much of a problem.

How do you react to that testimony?

Mr. KURMAN. Well, I react to it in this respect.

No. 1, it was a slipshod study at best. It was a voluntary study, and I think I have proven where even—where there is legislation, and if it is not tight legislation—for instance, in the case of the boy blinded, I think, up in Connecticut with a hoe handle, they will not report it unless they absolutely have to.

Now, there is also another factor to consider in this thing.

A few States have got some good legislation, such as Michigan, Colorado, Connecticut.

What is to stop some fast-buck operators from jumping to another State and operating? How in the world can a parent such as myself, in Connecticut, if I read an ad in the newspaper or someplace else, check out a camp that may be out in Wyoming, Arizona, or even up in Ohio or up in your State of Minnesota. Physically, it is almost impossible.

As far as brochures, I found that the brochures are meaningless. They print the same worthless brochures from year to year, regardless of the tragedies that happened in the past.

Naturally, there was a little statement put in the magazine New Times, that was just published, a fellow who does photography work for the camps. And I asked, "Well, what about the bad aspects of the camp?"

He said it is like photographing a person. If you have a scar on one side of the face, you naturally photograph the other side.

It is a business. It is the same as any other thing.

I am a businessman myself. I am not against business. I think the camping business would be far better off if they straightened out their own house. I am not interested in boycotts. I just want safety legislation which they themselves will benefit from.

Senator MONDALE. Do you think accreditation by ACA or other groups is a fairly good indication of camp safety?

Mr. KURMAN. Absolutely not.

The reason I say that is this, the American Camping Association is the old Camp Directors' Protective Association. The name was changed in 1934 at a meeting down in the Poconos to the American Camping Association, which sounds better, more respectable and so forth.

But the basic philosophy of the camp is still the Camp Directors' Protective Association.

They had just about no regulations at all to speak of until about 1970, I think it was, when, after all the things started coming out into the open, they updated their standards. But they still do not have the force of law to do anything.

In the event something goes wrong, the most they can do is weed somebody out of their organization. That is all.

I cannot see the Government delegating its responsibility to an operation of that nature.

As far as Boy Scouts, I found the same thing.

Senator MONDALE. When you are a member of the ACA, do you not have to be accredited?

Mr. KURMAN. That is a very interesting thing.

They tried to sell me a membership. I do not even own a camp.

They have what they call associate members. They have members and they have approved members.

Now, how in the world is the public supposed to know what is what between an associate member, a member and an approved member?

An approved member means meeting the standards. In fairness, their latest standards are fairly good. They do not have the power of law. It is about time we realized that.

Senator MONDALE. You think their standards are quite good.

What you doubt is whether they are being enforced?

Mr. KURMAN. I think their standards are reasonably good, except they are weak in their key points, such as personnel. There is no force of law regarding it.

For the most part, the most they can do is weed somebody out of the organization or something of that nature.

Senator MONDALE. I do not know if this is a fair question, but if you were to list the five top areas of camp safety danger, what would they be?

Mr. KURMAN. I would say primarily the area that I have been able to find—not because of the death of my boy, but just checking hundreds of cases, and I have got hundreds of cases in my file, would be the waterfront.

I do not want somebody in that waterfront unless he is a Red Cross qualified instructor. And I emphasize a Red Cross qualified instructor.

I have actual records. I think I read one of them where kids were taken down the river, and there was nobody qualified to save the kids. They did not know how to give mouth-to-mouth resuscitation.

Senator MONDALE. Why do you call it waterfront?

It is water safety.

Mr. KURMAN. Water safety instructor.

Senator MONDALE. What would be your next one?

Mr. KURMAN. The other category that I would definitely look into and make sure it is tightened up on, because there have been some very gruesome tragedies regarding that, and that is transportation.

I do not want these old buses—I do not want the old flatbed trailer trucks used to transport children.

There is one case, and I did not mention this, the Boy Scouts at Poughkeepsie, N.Y., went for a trip to New Mexico. That is across the United States in a 21-year-old bus.

Luckily, for everyone, the bus simply died in its tracks of old age 65 miles away in Pennsylvania.

I wouldn't even make a chicken coop out of that bus. They had no business using a bus of that nature, a 21-year-old bus.

That would take care of the factors of water safety and the factor of transportation.

I would say there is a necessity to make the camps conscious of the fact that they have to tighten up in their fire precautions. I have got quite a few records where kids were burned to death.

No. 2, a lot of those camps are in areas where you cannot get fast fire service, even if you want to. You cannot get a hose and all of that sort of thing.

I would want them to have a fire extinguisher handy. Some camp operators feel that is a nuisance the kids get ahold of it and play around with it. I would rather have the nuisance and worry about it than trying to get it if you need it.

I have records of camp fires where children were killed outside of Philadelphia, up in New Hampshire and elsewhere.

Also, the most important one—I mentioned the waterfront as being the most important, but when you get down to it, the personnel. That is the real meat of the entire thing.

I do not want somebody taking care of my children or anybody else's child who has a background of either mental incompetence or sexual perversion. There are quite a few cases I can cite, including a regional director of the Boy Scouts out of Springfield, Mass., who was indicted and convicted on 55 counts, and got 2 years in jail.

This Boy Scout regional director is Roger Norton who is now serving 2 years in the Hampshire County, Massachusetts House of Correction. He was sentenced by Judge Kent Smith on December 21, 1973, after pleading guilty to charges of unnatural and lascivious acts with children under 16. The 55 charges cited by the grand jury included 16 charges of lascivious and unnatural acts on a child under 16, 16 charges of contributing to the delinquency of a minor, 16 charges of being a lewd and lascivious person, and 7 charges of indecent assault and battery on a child under 14 and a charge of sodomy.

This is not a Scout leader. This is a director of Springfield, Mass. And I have got plenty of others.

I want somebody there who is morally, physically set up to handle those kids and at least reasonably expert in the field in which he is supposed to be in charge.

If he is taking them on a canoe trip, he should be very much aware of the problems that are involved and what precautions should be taken.

Senator MONDALE. What about firearm safety?

Mr. KURMAN. Firearms is nothing to belittle.

I mentioned the case of the boy who was shot in the abdomen up in the Catskills. That is not an isolated case.

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I have another case where I questioned the wisdom of having a 32-caliber revolver around the premises of a Boy Scout camp in New Jersey—this was in 1973.

I got wind of it, checked it out, and I was with the State police and I checked out personally a 19-year-old exchange Boy Scout from England who was "horsing around" with a gun—those were the words of the State trooper, horsing around with a .32-caliber revolver that belonged to one of the professionals—horsing with—horsing around with a gun—he shot the kid in the back of the neck.

I went down to see the boy in the hospital. If the kid even lived, he would be paralyzed the rest of his life. He was in horrible shape.

I was told they had a problem with copperheads and that was the reason they had a revolver.

There are not that many copperheads in all of the Poconos.

This is an interesting choice. Later on, the entire thing was dismissed, it was ruled an accident. But when I followed up on it, I found that the man who was also dismissed, who owned the gun, was later picked up with $2,300 worth of stolen tools in his possession and another loaded gun.

Now, he is going to serve time in prison. He was not going to serve time for possession of the gun that shot that boy, but he is going to serve time for the property that was stolen.

Where they have a rifle program, it should be on a properly laid out rifle range, and they should have proper instructors, and they should not have multiple firing guns. They should have single shots. Hand the kids the bullets as they are going to shoot them.

Another case that comes to mind is 25 children were taken to a rifle range in California at a YMCA camp. These kids—kids were shooting all over the place. A kid in the adjoining camp was hit and blinded.

The parents were ignored. Finally, they got disgusted, and when they got a lawyer, he turned around and sued every one of the parents of the children on that range, because you are still responsible for the actions of a minor.

Senator MONDALE. That is very useful. Thank you very much for your presentation.

I must say I admire the enormous amount of work you have done, to put the meat on the bones.

Mr. KURMAN. I just want to mention one thing in closing.

On the way up to do a 4-hour radio program with the GE station in Schnectady on July 9, I could not believe it. There was a headline about a girl lost at camp.

On July 10, I went to the camp and looked it over, and there is a small beach—on about a three-acre pond. The rest is very, very thick heavy overgrowth with thick mud bottom.

Certainly they should have watched those kids carefully. They had children there as young as 4 years old at that camp.

Here is a kid the first day at camp wandering away. They found her body next day in the pond. This is this year.

Senator MONDALE. Thank you very much for your most creative and exhaustive testimony in the treatment of this subject.

Mr. KURMAN. Thank you.

Senator MONDALE. Our next witnesses consist of a panel of State officials, Dr. Ellen Fifer, Assistant Comissioner of Health, State of Minnesota; and Dr. Oscar Sussman, Director of Consumer Health Service, State of New Jersey.

If you will come to the witness table together please and if you will proceed.

STATEMENT OF DR. ELLEN FIFER, ASSISTANT COMMISSIONER OF HEALTH, STATE OF MINNESOTA; AND DR. OSCAR SUSSMAN, DIRECTOR OF CONSUMER HEALTH SERVICE, STATE OF NEW JERSEY

Dr. FIFER. Mr. Chairman, I am Dr. Ellen Fifer representing the Minnesota Department of Health.

I have submitted a brief written statement so I will just comment on a few points in the testimony.

First, Minnesota has had legislation in this area since 1951. I would suggest our legislation and regulations attendant on it are not adequate to fully meet the needs that have been discussed this morning, that we do have a program primarily directed toward environmental aspects of camp safety.

I think in that area that we do reasonably well. Our staff has been very limited as is so often the case. We do not get to every camp every summer as we should, but probably cover about two-thirds or three-quarters of them during the season, which is somewhat short in Minnesota.

We estimate that we have approximately 150,000 children and adults attending camp in Minnesota. This does not include day camps.

I would like to go on record as endorsing the concept of national standards. I feel that we should expect in Minnesota to take children from other States and provide them with recognized levels of camp health safety. We would be glad to abide by such Federal model legislation or regulations as are devised, and I think we could be counted upon to implement and endorse such regulations.

I guess my plea as a State employee is for administrative simplicity to the extent we can have that, perhaps in terms of a model bill, required adoption by each State of regulations which are equal to or superior to minimum Federal standards. If a State in fact adopted such legislation and such regulations, it would be required to enforce them, and hopefully have some Federal assistance in enforcing that legislation. If a State did not, then I certainly would expect there would be Federal override or penalty or direct Federal supervision would take place.

I had a few brief comments on some of the specifics in the bill that I have reviewed. I think the travel camp situation represents a very difficult situation as it does tend to get interstate, and we would certainly be willing to have direct Federal supervision of such camps, if they do move, for example, from State to State.

Senator MONDALE. What do they do? They are just camps that say: "we are going to visit the West"?

Dr. FIFER. I believe, Mr. Chairman, that they sometimes come to a State and begin there and they are advertised as starting from, let us say, from Minnesota, but they will go to Yellowstone Park or they will go up into Canada or other places.

Senator MONDALE. Is that what these Mexican trips are, travel to Mexico and travel back?

Dr. FIFER. I believe these are examples of travel camps. Of course for a State this makes it very difficult to perform any kind of effective supervision.

Senator MONDALE. Yes.

Dr. FIFER. We did have one suggestion in terms of additional things you might want to consider in either the model legislation or regulation, which would be some evidence of fiscal responsibility on the part of camp operators. I did cite an example of the situation where campers were abandoned by the camp operator, who left with all the funds, and we had to move in and see that the children were fed and that there were bus fares and supervision of the children until we could get them home.

Senator MONDALE. So it could be some kind of bonding authority?

Dr. FIFER. Yes, some demonstration of fiscal responsibility on the part of the operator or responsible authority. We certainly would support very strongly the idea of getting accurate reporting of camp injuries and deaths. It is difficult now with the present methodology to really determine what is going on, and we do not have this data. We would like to have the information on which to take action.

Senator MONDALE. Suppose there is a death in a camp in Minnesota, do they report that to you?

Dr. FIFER. Mr. Chairman, it would be reported just in the normal course of events. I do not think this is adequate. It would be an accidental death on a death certificate. I feel we should have some special reporting mechanism which we are set up to handle and simply have not required. I think we can handle that within our present authority and should do that.

I would like to see national data required so we could get a better picture of the kind of incident that has been described here. I do not feel we have that.

Senator MONDALE. I am very skeptical of HEW's data. What bothers me is if a camp that had problems would voluntarily send in a report that would get itself in trouble or bring about regulations which they usually do not want.

Let us turn now to Dr. Sussman, and then I will question you together.

Senator Williams, the chairman of this committee, and a very effective one, asked that I apologize that he could not be with us today.

Dr. SUSSMAN. I appreciate the opportunity to come here.

Before I start my own remarks, I would like to comment on statements that were made by Dr. Cook in his report and that of Dr. Cooper, as Deputy Assistant Secretary for Health. I guess maybe I should give you a few of my credentials beforehand. If you look at the last page of Dr. Cook's statement, it says who he is. If you look in the report that Dr. Cooper mentioned, you will see how they have spoken about the people who did this survey.

I am a doctor, a veterinarian, and I have a master of public health at Yale, and I have taken statistics and I am a lawyer. I think the most important qualification I have, Senator Mondale, is I have been a bureaucrat for 34 years and I have never seen a more massive bunch of gobbledygook put together in one set of two documents. I am just utterly amazed and horrified.

In the first place, the statements that were made by Dr. Cook; well, this says:

> Of the 200 camps in the primary sample, 128 were surveyed. Only 27 camps refused to participate for various reasons; 6 other camps were dropped by us when it was found that they were not providing the promised data.

Maybe they had more deaths than they should have, I do not know. But the statistical significance of this stuff that we as taxpayers paid for scares the hell out of me. Pardon my language. I cannot just comprehend it.

And the statement that Dr. Cooper made, where he is talking about—"Accordingly, the Department is now developing model legislation and regulation for adoption by States without enforcement"—the actual thing is, in some State that adopts it and does not have the money and does not provide it, which has and will continue to have it, is giving the public a misleading and deceptive feeling about the fact that they are protected.

Dr. Cooper does not seem to realize that we are dealing with an interstate commerce provision. That is the only thing I disagree with the doctor sitting next to me on.

I think travel camps are in a State, but I also think all States where any advertising, where any papers are going across the State, or any magazines puts them clearly under the interstate commerce, if you want to call children interstate commerce——

Senator MONDALE. There is no doubt in terms of the legal approach. I wonder if there are any figures on the number of children who cross State lines for the purpose of attending camps? I assume there are none, but it must be a tremendously high percentage. I was just thinking I have got two kids in summer camp, one in West Virginia and one in Pennsylvania. Based upon my spot survey, there must be quite a few.

Dr. SUSSMAN. I would like to go back to Dr. Cooper 1 more minute if I may.

The Federal meat inspection laws protect us presumably from meat going across State lines and it also gives the Secretary of Agriculture, if a State plant in one State where the meat is not going across a State line does not comply, the Secretary of Agriculture may go in and force the State to do the thing that is required.

Senator MONDALE. That is my bill so I am quite familiar with it.

Dr. SUSSMAN. The second one, the fruit and drug law, with regard to thalidomide, if you apply the same amount of reason that Dr. Cook and Dr. Cooper had, we would really have no reason for food and drug laws because one of the things it said was—I guess this is in Dr. Cook's presentation, he said, however, when one asked whether Federal legislation would significantly reduce the frequency and severity of camper injuries and illness, then the answer also seems to be, no, because responsible agencies and organizations and camps have for years been improving their own rules and regulations to protect the health and safety of the camper. This is 100-percent true with regard to food and drug concerns that are legitimate, responsible people. It is also 100 percent true with regard to milk plants. Is that the reason then to allow a milk plant which does not have a proper sanitary method of pasteurizing milk this day and age to operate? Hell no, they would not say this.

You can follow that same line of reasoning on something that I think is really tremendously interesting to me.

I am in research work. One of the things that happens is, it is true that States can protect our children, but I believe interstate commerce does enter into the advertising, mailing, and transportation, and you

agree with me. The Federal Government has as much responsibility in protecting health and safety of children in all States to the same extent they do with regard to the meat and poultry the children and their parents eat. Federal legislation now provides this protection. In fact, Federal law, the Animal Welfare Act, now protects the health, safety, and proper care of dogs and other animals used in medical research. This is true even if the dogs originate in New Jersey and are used in New Jersey. This is a paradox, is it not, where animals are protected, but we are here today still discussing whether we will afford similar protection to our children.

I really am upset. I never expected to come here and hear the statements made. I have made my presentation available to you, and I would be glad to answer some questions.

Senator MONDALE. Have either of you looked at the standards that have been promulgated by the American Camping Association, by Boy Scouts and other associations?

Dr. FIFER. I have reviewed them.

Senator MONDALE. How do they strike you, as being adequate?

Dr. FIFER. I felt the standards generally are good, but I do agree that they are not enforceable under their rules. I do think that they in addition to the various regulations and legislation from States could be used as the basis for a model.

Senator MONDALE. That is what I was getting at. If we do establish a Federal law, should we refer to or incorporate by reference these standards for the purpose of establishing a minimum level of requirements for camps in the country?

Dr. SUSSMAN. I would prefer that you not put in by legislation reference to the standards. I would prefer that the method you use in your bill S. 3639 be used where you have a group come together on a relatively frequent basis to revise the standards and the necessities, because if you do it the other way you are laying yourself open to having the American Camping Association or anyone make the decision, I would rather the decision be made by the group.

Senator MONDALE. I think you are one of the six States that is thought to have a fairly decent youth camp safety law and enforcement. Is that correct, New Jersey?

Dr. SUSSMAN. We have standards and I will make them available. I did not happen to bring them along.

Senator MONDALE. Did you inspect your camps?

Dr. SUSSMAN. We inspect our camps. We just started. Do not give us too much credit.

Senator MONDALE. It is a brand new bill?

Dr. SUSSMAN. It is a brand new bill. We intend inspecting at least twice a year. The inspection will be made by licensed sanitarians. One of the things I generally disagree with is, I think there should be no rules and regulations unless they are needed; and second, there should be no rules and regulations unless they are enforced. It seems to me that this educational technique seems to forget sometimes, that is Dr. Cook's educational technique, seems to forget that the best educator is that when there are no clients, no patrons, no people coming in, whether it is a camp or not, and that the public relations aspect of letting them know that they have not complied, that is let the public know, I think that is a darn good educational technique.

I have a couple points I want to get in definitely with regard to S. 1830 if I may.

In the first place, section 3(e), I think it is, the children of Puerto Rico and the Virgin Islands are not included. Regardless of which bill is passed, that certainly should be included.

In section 4 in S. 1830, it provides only for the payment of up to 50 percent. I really think if you go back to the Federal Meat Inspection Act, you can see that in the Federal Meat Inspection Act, and that is in my paper, at least——

Senator MONDALE. Eighty percent.

Dr. SUSSMAN. No, it is only 50 percent.

Senator MONDALE. We amended it to 80 percent.

Dr. SUSSMAN. What I am interested in——

Senator MONDALE. We started at 50 percent. Then we found all the States were just giving up, so we raised it to 80 percent.

Dr. SUSSMAN. It has not been passed yet, has it? Maybe it has passed the Senate but not passed the House of Representatives.

Actually when you did only 50 percent, it began to be certain that while everyone was willing to argue for States rights, if it cost them 50 percent of the program, they were not going to do it. Maybe for 20 percent they will do it.

On section 6(b), in S. 1830 it has to do with advertising. This just means if a State wants to allow a place to advertise, then they do have to comply with the Federal standards. But if they do not want to say they are complying with Federal standards, they can be a member of protective associations, so to speak, and if they do not require it, they can operate it. I think that would be a very silly type of section to put in.

And section 8, I had in my paper that a more definitive system of administrative hearings prior to an appeal to the U.S. Court of Appeals would provide for a smoother and more efficient means of adjudicating any disputes which may arise.

In section 9(a), and that would be true in either bill, you should make some proviso for people like the American Public health Association and other recognized consumer groups to be present, not only industry groups, but also recognized consumer groups. If I were to take my choice, Senator, not that you are here, I think I would have to say that I would ask Senator Ribicoff, with whom I have worked before, to suggest that he try to amend S. 3639.

I hope before I close that I can get my thought across so that the Congress of the United States can protect us in the case of thalidomide with enforceable regulations, thalidomide would never have been stopped as quickly as it had if we did not have Federal food and drug laws, and I say that if we can enforce our Federal regulations to protect dogs and cats and other animals, then we certainly should expect you—I do not mean ask you—we should expect you to pass a law that would protect children. I do not think it is a question of being nice to you. I think it is a question of your being correct with us.

Thank you.

Senator MONDALE. Thank you very much.

As you know, Senator Ribicoff was here today and indicated he is perfectly open to resolution and he wants the problem taken care of. He is not wed to any particular provision of his measure or mine.

Thank you very much for your most useful statement.

Dr. FIFER. Thank you.

[The prepared statements of Dr. Fifer and Dr. Sussman follow:]

Testimony Before
Senate Subcommittee on Children and Youth
July 15, 1974

Mr. Chairman, Members of the Subcommittee, I am Dr. Ellen Fifer, representing the Minnesota Department of Health.

The State of Minnesota has had legislation and regulations relating to Children's camps since 1951, almost 25 years. The Minnesota law provides for the issuance of permits to operate a camp, requires annual inspection of each camp, and provides for revocation of permit, after appropriate hearing procedures.

The Minnesota Department of Health Regulations are primarily, but not exclusively directed at environmental conditions such as: campsites, buildings, sleeping quarters, kitchen area food storage and service, water supply and sewage disposal.

Some important health and safety factors are also provided for: swimming, use of hazardous weapons, physical examination, and check up for communicable diseases on arrival. In addition it has been our practice to distribute copies of the American Red Cross Operating Code Aquatic Program for Health and Safety of Organized Camping Groups to camps during the inspection process and request that they abide by the Code. These are not, however, part of the regulations.

As is so often the case, our resources to implement the law and regulations have been very limited. One sanitarian has been assigned to the program, and he is also responsible for industrial camps and migrant labor camps. However, for the past 2 years we have decentralized the operation, involving 7 district office sanitarians and have visited 3/4 of the camps in Minnesota each of the past 2 years. We have 209 sites for which we

issue 236 permits in Minnesota. (More than one responsible group using a camp site accounts for the discrepancy in numbers) 180 of the sites are for non-profit organizations, about 2/3 of which are church - sponsored camps. 29 are proprietary camps.

In regard to the Bills before the Committee, S. 3639 and S. 1830, I would like to make some general comments and then some specific suggestions.

First, it is apparent that camping is an inter-state activity; that is, children living in one state commonly go to camp in another. There is no way that parents can know the standards or lack of them in another, sometimes distant, state for camps and camping activities. Therefore, basic standards which are common across the nation would seem logical and necessary. Surely what is safe and healthful for campers in Maine should also be safe and healthful in Minnesota.

Secondly, the mechanism for how federal standards are developed and implemented, or state standards which are equal to federal minimum standards are adopted and implemented can take a variety of forms.

The development of a State Plan is an administrative tool which provides for some state initiative and input, while keeping the entire system basically under federal control. As each of a number of State Plans is developed, it does necessitate coordinating a myriad of separate and distinct categorical plans and is administratively very cumbersome.

We presently develop State Plans for Maternal and Child Health, Crippled Children's Services, Emergency Medical Services, Immunization Services, Venereal Disease Control Services, a Hill-Burton Plan, and elements of the Occupational Health and Safety Plan.

Rather than yet another Plan and its attendant complexities both at the State level and at the HEW regional and central level, the development by HEW of a set of minimum standards with a period of time given for state adoption and implementation with federal assistance would perhaps be a simpler preferable alternative.

The states that did not act to adopt and implement the minimum standards within a given time period could be subject to direct federal inspection and control or subject to other fiscal penalties.

Thus, those states that chose to act could, with federal assistance, implement an effective program without the need for an extensive new administrative structure for Plan review, regulation development, approval and disapproval of state plans, etc.

The administrative mechanisms should be as simple as possible, allowing the state to assume initiative and responsibility as is appropriate.

Specific points about S. 3639 are as follows:

1) Section 6 (b) (4) Some camps are only in operation a very short time, as short as 5 or 10 days. This makes it difficult to assure inspection of every camp during every operational cycle. Inspection of the camp <u>site</u> annually during operation is possible and appropriate.

2) Section 13 The supervision of "Travel Camps" under federal jurisdiction is appropriate.

3) Sections 6 (b) (8) (9) (10) provide for State assurances concerning State funding for administration and enforcement, as well as for reports and information and fiscal controls. There is much precedent for concern that the federal funds be sufficient to assist states to perform a much more structured and

extensive program than they have done in the past. The limitations of state resources are well known. The 314 (d) Public Health Services grants and Maternal and Child Health and Crippled Children's Services grants have stayed constant for years, resulting in an effective annual decrease of buying power and program equal to the rate of inflation. In S. 1830 the top amount of $50,000 is specified. I might comment that anything less than that is no longer an effective incentive.

4) One consideration for possible addition to the legislation would be a demonstration on the part of the owner or responsible party of fiscal responsibility. This would be to ensure that in case of financial problems, a camp could operate until at least all children could be taken care of and/or returned to their homes. An incident in Minnesota last summer prompts this suggestion.

The camp owner left the area and the state with all the funds. The Camp Director notified our office that there was no money for food and/or bus fares to send the children home. Other camps in the area were notified and provided prompt assistance in terms of food and personnel. We sent our District Sanitarian to the camp for several days until all parents were notified and arrangements made for transportation of the children to their homes. This incident prompts our concern for some demonstration of fiscal accountability.

We welcome progress in the area of camp health safety programs and will assist in any way we can to promote such programs in Minnesota and to assist HEW officials in the development of standards if and when appropriate.

Submitted July 15, 1974
Room 4232 - Dirksen Senate Office Building
Washington, D. C. 20510

Oscar Sussman, D.V.M., M.P.H., J.D.
Director, Consumer Health Services
New Jersey State Department of Health
1911 Princeton Avenue
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STATEMENT

S - 3639

New Jersey is one of the states in the United States that has realized the problem that is presently faced by parents in determining whether or not a camp to which they send their children is indeed a safe and healthful experience for their children. The New Jersey Legislature passed Chapter 375 of P.L. 1973 which was signed into law on January 9, 1974. This act is known as the "New Jersey Youth Camp Safety Act." The Act states its purpose is to:

> "*promote,* protect and safeguard the health and well-being of the youth of the State attending day camps and resident camps by providing for establishment of standards for the operation of such camps, thereby providing assurance to parents and interested citizens that youth camps meet minimum safety standards."

As you can see, the State of New Jersey is prepared to comply by existing state law with most of the terms of S-3639.

UNFAIR COMPETITION:

S-3639, in my opinion, is a needed piece of legislation. It is good legislation. It will tend to remove considerable concern and worry on the part of local and state health officials in the State of New Jersey, that when we enforce needed health and safety standards on camps operating in New Jersey we are not being unfair and discriminatory against them. We wonder whether we are tougher on our own business enterprises and our own eleemosynary and nonprofit institutions than the situation their competitors are encountering in nearby states. In the absence of legislation similar to S-3639 there is a definite possibility that this could be a fact.

Federal legislation should not be enacted and standards not promulgated unless needed to protect the health and safety of our children. However, if needed and promulgated all states must enforce them equally! If nearby states' health and safety requirements are not as stringently enforced it would be less costly in manpower and money to operate a camp that does not meet the similar standards of health and safety. The requirements of proper electrical wiring, proper boat safety apparatus, water safety and life saving personnel requirements, food handling procedures and similar types of requirements with regard to the entire camp operation in most cases requires more personnel and therefore more money to operate safely and with due precautions for health of campers. When parents of children in New Jersey read advertising sent through the mails or in magazines which enter into interstate commerce which sound good, and when they hear discussions which sound better, and see brochures which look like Utopia, in the absence of a general national supervision, such as, S-3639 aims toward, all of these

may be in many cases just old fashioned "puffing" and the use of similar "Madison Avenue" advertising techniques.

INTERSTATE COMMERCE:

While it is true we and other states can protect our children, I believe interstate commerce does enter into the advertising, mailing and transportation. Thus the Federal Government does, in my estimation, have as much responsibility in protecting the health and safety of children in all states to the same extent they do with regard to the meat and poultry the children and their parents eat. Federal legislation now provides this protection. In fact, Federal Law, the Animal Welfare Act, now protects the health, safety and proper care of dogs and other animals used in medical research. This is true even if the dogs originate in New Jersey and are used in New Jersey. This is a paradox isn't it where animals are protected, but we are here today still discussing whether we will afford similar protection to our children.

PLAN REQUIREMENTS:

I find Section 6, a and b, ties down the implementation of any state plan quite well. The eleven requirements in section 6, b, are not onerous.

NEED FOR ADMINISTRATIVE HEARINGS:

Section e certainly gives each state the opportunity of even a court decision should there be a difference of opinion with respect to any action by the Federal Government.

FEDERAL AID - CARROT AND STICK APPROACH:

Section 8, a, is a point which leaves me to question why any state would want to require or to set up their own state plan when by not setting up such a plan the Secretary of HEW would be responsible for enforcement of all Youth Camp Safety Standards in each of the states which fail to submit an acceptable plan.

FEDERAL PRECEDENTS - WHOLESOME MEAT AND POULTRY INSPECTION:

There is precedent in the Federal Meat and Poultry Inspection Act and Standards wherein a similar requirement of the legislation puts the Secretary of Agriculture in a position of having to provide money to pay for meat and/or poultry inspection personnel when a state fails to provide such inspection services. To this date it is my understanding that 13 states have accepted the offer of the Federal Government, by this legislation, to pay for the entire cost of state meat inspection programs. These and/or territories are:

Kentucky	Minnesota	Missouri
Montana	Nebraska	North Dakota
Oregon	Nevada	Pennsylvania
Guam	Washington	Virgin Islands
Puerto Rico		

With regard to poultry inspection there are now 22 states and territories that have accepted the Federal Government's invitation to provide entire costs of poultry inspection and these states are as follows:

Arkansas	Colorado	Georgia
Idaho	Kentucky	Maine
Michigan	Minnesota	Missouri
Montana	Nebraska	North Dakota
Oregan	Pennsylvania	South Dakota
Utah	Nevada	West Virginia
Washington	Puerto Rico	Virgin Island
Guam		

Therefore, Section 8-(a) provides for the same possibility as does the meat and poultry inspection act. Those states who wish to have their own State Programs if it meets the federal standards will get federal aid. Those states who fail to meet federal standards will have that responsibility shifted to the federal government.

SUPERVISED FEDERAL ENFORCEMENT NECESSARY:

I am in agreement with Section 7 and 8 for I believe that 80-20 payment factor, if it were completely activated, with no monetary limits, would result in states preparing good plans that would provide for proper functioning at the state level. I disagree with those members of this industry and those state officials who indicate that the Secretary of HEW should issue regulations, procedures and standards but without giving to that official any real enforcement capabilities other than the withdrawing of the 80 percent of the funding factor should the plan not meet with Federal approval.

It is incumbent and necessary for the Secretary of HEW to have an adequately trained, supervisory inspection staff available for field activities in this connection. This is needed in order to actually make certain the state plans are not just paper plans, but are, in fact, properly implemented. To do otherwise and without a supervisory field staff, this Act may very well lead to misconceptions, deception, and generally misleading of the consuming public in those instances where the state fails to meet their plan. A written plan not rigorously enforced will lead to misleading of the consumers involved.

The only way this would ever be determined would be by a supervisory Federal investigative staff. Penalty actions could never be implemented without a field supervisory staff which actually went to camps and observed by means of unannounced sampling techniques.

PENALTY ACTION - STATE AND FEDERAL RESPONSIBILITY:

I believe the Federal Government should have the authority as is emphasized in Section 10.

Consideration should be given to have enforcement also the responsibility and authority of cooperating states by cross commissioning of state employees. This is already done in other areas of Federal-State relationships. To do otherwise is to rely soley on the 80 percent aid to the program costs. I do not think this is

sufficient incentive. This law and its standards will not affect adversely any good, well operated, properly functioning, healthful and safe camp. It will undoubtedly eliminate those camps that are hazardous, poorly operated and dangerous for anyone to send their children to and so it should be if we are as interested in the health and safety of our children as this legislation's intent indicates.

TRAVEL CAMPS - SECTION 13 and 9(c)

Travel camps should be the primary responsibility of the state of origin. The activities should be jointly coordinated where feasible with the other states involved. I, however, do not advocate a cumbersome, unworkable bureaucracy. Care must be taken to avoid unwieldy red tape in the supposed furtherance of health and safety. Red tape should be cut where it is unneeded and wasteful of time and money. The Federal Government should have no greater control over travel camps than resident camps.

FEDERAL RECREATION CAMPS - NO DOUBLE STANDARD:

The Secretary should not be permitted to develop a separate set of safety standards for Federal recreation camps but should follow the same standards as the other camps in the state wherein located. No exception should be given because it is Federal land. It is my belief that state inspectors should be responsible to make inspections at Federal locations just as they would at other locations throughout the state, and that the state should be given such authority by this legislation.

STATES' RIGHTS?

I am a staunch States' Rights advocate but when states yield to acceptance of Federal funds for specific programs they cannot have their cake and eat it too. States' Rights must yield to the extent of the acceptance of Federal largesse.

States' Rights also must yield to the Federal Government with regard to the question of protection of interstate movement of people, interstate advertising, and interstate commerce in general with regard to camps--resident and travel types. To attempt to eliminate Federal intervention when Federal support money is involved is to say that many state and local officials who have been guilty of criminal acts or negligence should not be prosecuted.

In New Jersey a Federal prosecutor with his investigatory staff convicted state officials of criminal acts. It does not make sense in our present day, fast moving transient population to attempt to keep the Federal Government out of what is clearly an interstate problem. I, for one as a "States' Righter" will have to concede that we must yield with the times and make our actions more relevant to today. The Federal Government now takes approximately seven dollars from New Jersey taxpayers and returns only one or so in service and/or funds. I am more willing to accept the supervisory activities of a Federal Camp Health and Safety staff as 80 percent of the camping program funds will thus be returned to the State of New Jersey to aid in our "Youth Camp Health and Safety Program."

CONCLUSION - RE: S-3639

It is my opinion that when Federal funds enter into a program such as this, then it is incumbent for the Federal Government to be permitted to supervise dispersal of the funds in a manner which is proper for financial and program accountability. In my estimation there is a need for this legislation. I recommend the passage with the necessary amendments of S-3639

STATEMENT

S-1830

I have objections to the following sections of this bill in particular:

Section 3 (e) - Children of Puerto Rico and the Virgin Islands should be included in this definition and they are not as it is written. In all cases where States are referred to it should include Puerto Rico and the Virgin Islands.

Section 4 - The Federal payment of up to 50 per centum of the cost of developing and administering State programs for youth camps safety standards is inadequate, 80% would be more inducing. If this bill is enacted, I doubt that very many States will be encouraged to develop State plans. Payment should also be made to territories and/or the District of Columbia, such as, Puerto Rico and the Virgin Islands.

Section 6(b) - In States in which camps do not care to advertise, compliance with the Federal standards is not necessary. Since there are no mandatory requirements in the bill, it means that camps in certain States of the United States can, in fact, continue to be unsafe without regard for any penalty action. This is a definite flaw in this bill.

Section 8 - A more definite system of administrative hearings prior to an appeal to the United States Court of Appeals, would provide for a smoother, and more efficient means of adjudicating any disputes which may arise.

Section 9(a) - Included on the Advisory Council on Youth Camp Safety should be members of the American Public Health Association and of other recognized consumer groups.

Failure to get consumers and those interested in public health matters involved in the decision making process will prevent the Secretary of HEW from obtaining the real concerns of parents and specialists in this field directly.

GENERAL:

The lack of any provision for supervised Federal Enforcement is a serious drawback of this legislation.

As I mentioned earlier it is incumbent and necessary for the Secretary of HEW to have an adequately trained, supervisory inspection staff available for field activities in this connection.

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CONCLUSION of STATEMENTS S-3639 and S-1830

I, therefore, feel that it will be in the best interest of the Youth of our country that S-3639 be passed with the necessary amendments, rather than S-1830.

I thank you, Chairman Mondale, and your Subcommittee for inviting me to testify before you here today. Should you have any further questions, I will be pleased to attempt to answer them.

Senator MONDALE. Our final panel witnesses consist of representatives from camping organizations.

If you will come forward, please. We have five organizations, I gather, represented here.

I do not know if you have prepared statements. If you have, I wish you would put them in the record as though read.

You have lived with this issue your whole life. You have heard the testimony today. We will go down the table here, and I wish each of you would emphasize what you think we ought to bear in mind as we approach this problem. We might start at the right end of the table.

You may proceed.

STATEMENT OF L. S. CHRISTOFERO, MANAGER, CAMPING AND ENGINEERING SERVICE, BOY SCOUTS OF AMERICA; ED ANDREWS, ACTING EXECUTIVE VICE PRESIDENT, AMERICAN CAMPING ASSOCIATION; PETER J. VERHOVEN, Re. D., OFFICE OF RESEARCH, NATIONAL RECREATION AND PARK ASSOCIATION; MARIANNE PINNEY, CHAIRMAN, NATIONAL TASK FORCE FOR YOUTH CAMP SAFETY, GIRL SCOUTS OF THE U.S.A.; AND ELSIE FISHER, DIRECTOR OF CAMPING, CAMPFIRE GIRLS OF AMERICA, A PANEL

Mr. CHRISTOFERO. I am L. S. Christofero, manager, Camping and Engineering Service, Boy Scouts of America.

We have submitted our testimony concerning both bills.

It says in the introduction, since we have always been concerned about the welfare of all youth, the Boy Scouts of America heartily endorses the intent of these bills, as it did predecessor bills on youth camp safety.

We are a rather large camping organization, in that we camp in summer camps, resident camps, approximately 780,000 young people in 600 camps.

We do have a national camp standard, and believe in it, and have done so for the past 25 years.

We have revised the national standards annually to make them current and bring them up to date. We inspect all of our camps twice a year, once in what we call a precamp inspection to be done 30 to 60 days prior to opening of the camp, and then what we call our standard camp inspection. I do not know if we could use the word enforce, but we do inspect all of our Scout camps.

We do have, and you have a copy of our standards, that on page 9 there is a paragraph which provides for the closing of a camp, or for the closing of a section of the camp, part of it, if it does not comply with the standards.

Senator MONDALE. We would like a copy of that.

Mr. CHRISTOFERO. I think they are already submitted to you, along with our statement. It is a pamphlet we use, which has all the interpretive statements.

Just to read for a moment about that: A camp that ignores or fails to take corrective action on one or more mandatory standards will be forced to close the program area until corrective action is completed.

Standards essential to health, safety, et cetera, these standards, if not met, the Council would be advised to close the camp until corrective action is taken.

That puts some teeth in it. Just this last week, in a camp in West Virginia, since their rifle range did not comply with the standards, we asked them to stop using the rifle range, and they did, until corrective action was taken.

We have no concern about Federal legislation as such. We have listed here some facets of it in terms that all organizations, private, public organizations, whatever, that there be a clear definition as to what a camping group is.

We would hope that it would be clear cut as to what is camping and what is not. We would hope that the youth camp safety legislation be funded by public funds, either Federal, State, or both, rather than by fees from the campers themselves.

This begins to limit, or increase the cost per camper, and might cause hardship on the part of young people, especially in cases where we are trying to make inroads into the inner city.

That special attention be given to coverage of all types of programs, and that the definitions be made clear.

Generally, and these are matters of record, that the training of the personnel that is going to inspect these camps be under a standard procedure across the country, and that it require that they have the proper knowledge of all types of camp operations.

Two weeks ago, some people from our office, myself included, assisted New Jersey camp inspectors, 110 of them, in what to look for in terms of rifle range, and waterfront.

I realize that I have colleagues here, so I will just say that as far as the Boy Scouts of America is concerned, we support this bill.

For whatever assistance we can be, we stand ready to do so.

Senator MONDALE. Thank you very much for a most useful statement.

I think your point about training gets into a very raw area. Sometimes the inspectors are not properly trained.

Mr. CHRISTOFERO. And do not know as much about the camp as the camp director, and should be able to detect things that perhaps the camp director, or somebody else might not choose to tell them about.

Senator MONDALE. We have never been able to figure out what to do with the self-importance factor.

[The prepared statement of the Boy Scouts of America as presented by Mr. Christofero follows:]

TESTIMONY CONCERNING

S-3639

and

S-1830

Presented by:

THE BOY SCOUTS OF AMERICA

At a hearing conducted by

The Subcommittee on Children and Youth

July 15, 1974

Introduction

The Boy Scouts of America has carefully reviewed S-3639 and S-1830.

Since it has always been concerned about the welfare of all youth, the Boy Scouts of America heartily endorses the intent of these bills as it did predecessor bills on youth camp safety.

The Scope of Scout Camping

The Boy Scouts of America is chartered by Congress and reports to that body each year. We feel a deep obligation to provide safe, healthy camping opportunities for young people.

Local Scout councils throughout America camp approximately 780,000 young people in its 600 long-term summer camps annually.

Troop and Patrol Camping

In addition to their long-term summer camp experience, hundreds of thousands of young people enjoy short-term (weekend) hikes and camps throughout the year with their own troop or patrol.

Since this requires eternal vigilence in matters of health and safety, the National Standard Camp Rating has been developed over the years for all Boy Scouts of America long-term camps. The rating contains 117 separate items ranging from safety standards to program standards.

This rating includes a pre-camp inspection required 30-60 days prior to camp opening and a full inspection soon after each camp opens.

These inspections are conducted annually by carefully trained volunteer and professional adults representing the National Council, B.S.A.

The inspectors have the authority to initiate closure of a camp or any of its sections should it fail to comply with mandatory standards.

(Copy of these standards is submitted.)

Education and Training

1. Camping literature in the following manuals:

   Managing the Council Outdoor Program, catalog #12001
   Summer Camp Program, catalog #12002
   Aquatics Program, catalog #12003
   Camp Business Management and Commissary Operation, catalog #12005
   Field Sports, catalog #12020
   Camp Health and Safety, catalog #3692
   Promoting the Great Adventure, catalog #3699

2. National Camping Schools - About 40 schools are conducted, throughout the country, to train and qualify personnel who will be holding key positions of management and program in each camp.

   These camp schools are developed by National Boy Scouts of America staff personnel and conducted by trained staff people in the six Boy Scouts of America regions.

Traveling Groups

Approximately 500,000 young people and leaders are involved annually in travel groups. The Boy Scouts of America administers a tour permit system which requires all groups to file records of adequate leadership, proper vehicles, insurance, and itinerary prior to making the trip.

Health and Safety Emphasis

A national Health and Safety Committee and professional staff work with local councils in establishing policies and procedures to conduct safe camps. The Health and Safety arm of the Boy Scouts of America projects directly through to local councils in order to assure that all activities are conducted with emphasis on safety.

Cooperation with other organizations

The Boy Scouts of America works cooperatively with many national and local organizations, including the American Camping Association. We are,

at present, working with the American Camping Association to develop a set of National Standards (camp inspection) that can be recognized by all camps within the American Camping Association and Boy Scouts of America scope of jurisdiction.

We recommend that these standards be referred to in development of any Federal standards.

CONCERNS

1. That legislation include all facets of organized camping in addition to recreation and education groups, programs, or clinics with camping characteristics.

2. That the Federal government, with its ultimate responsibility for the law and its minimum standards, encourage uniformity among states.

3. That implementation be the responsibility of the states.

4. That travel camps be governed by state law of the state of origin.

5. That Youth Camp Safety implementation be funded by public funds, Federal, state, or both, rather than by fees from camps which would eventually come from the campers themselves.

6. That further development of the law and its implementation use the resources and expertise of recognized camp leaders and operators.

7. That special attention be given to coverage of all types of programs, making clear definitions in order to preclude any contest of possible ambiguities.

A. Refer page 9, section 8A - "Secretary responsible for the enforcement of youth camp safety standards": -- That specific emphasis be given to methods, trained personnel, and specifics as to how this will be done.

B. Refer page 13, section 12 - Variations: -- Concern here is for qualification, knowledge, and training of "field inspector."

C. Refer page 14, section 15 - Advisory Council on Youth Camp Safety: -- That this body should include as members, representatives of public and private organizations directly involved in youth camp operation.

D. Refer page 13, section 13 - Travel Camps: -- A clear definition of a "travel camp" is needed. The Boy Scouts of America through its tour permit system monitors thousands of local and troop tours in a year. If the Secretary were to require registration of these troop tours from all agencies operating this type of program, it would be extremely cumbersome.

It is our feeling that these qualified agencies should be permitted to continue the registration and regulation of this type of camp.

On January 17 and 18, 1974, the Boy Scouts of America representatives met with representatives of many camping organizations including the American Camping Association. These people then met with the representatives of Congressman Daniels and Senator Ribicoff on January 18. The testimony presented here, to a great extent, reflects the joint thinking of these organizations.

COMMITMENT

The Boy Scouts of America offers the services of its skilled staff, national and local, in the establishment of standards, training, and procedures.

COMMENTS

Federal legislation should provide flexibility to meet the varied program needs of a wide variety of camping.

This bill's intent to provide a safe, fulfilling camp experience for all youth is commendable and necessary. For its effective implementation, however, it will require the advice and counsel of competent representatives at Federal and state levels.

Respectfully submitted,

BOY SCOUTS OF AMERICA

L. S. Christofero
Manager
Camping and Engineering Service

7/8/74 hc

Senator MONDALE. Ms. Pinney. Would you please proceed?

Ms. PINNEY. I am Marianne Pinney, chairman, National Task Force for Youth Camp Safety, Girl Scouts of the U.S.A.

We are very grateful for this opportunity to testify. We heartily endorse the intent of this legislation, and offer for your consideration recommendations based on our years of camping experience.

We have submitted a formal statement to you, along with copies of GSUSA standards for the record.

I would like to summarize the main points made therein.

Each of the basic types of Girl Scout camping—resident camping, troop camping, and day camping—has its own unique characteristics and variations, meets particular needs of girls, and provides a special service to the local community.

In Girl Scout resident camping, girls attend as individuals, not with their troop. The resident camp serves girls from the entire council and often includes girls from neighboring councils. Sessions are 6 to 14 days in length, and camps operate with a staff employed for the entire season.

Although sites are generally permanent, facilities vary from being almost resortlike to being quite rustic and rugged.

In 1973, 175,000 girls—both members and nonmembers—attended the 450 resident camps operated by local councils. Girl Scout camping standards cover the operation of these camps, and the standards proposed by S. 3639 would compliment our existing efforts in this area.

Troop camping refers to the camping of an ongoing neighborhood group in which responsible adult volunteers who have worked with the children on a regular basis, and who have taken training for their jobs as Girl Scout leaders, go camping.

The size of the troop, the ratio of girls to adults, and the criteria for site selection, and other health and safety factors are regulated by Girl Scout standards. Choice of site, activities, and length of stay are determined by the needs, age, and experience of the girls in the troop and the qualifications of the adult volunteer leadership.

Troop camping, because of the neighborhood base of the troop and the low cost, serves more girls than any other kind of public or private camping in the United States. Our data indicate that there were 3 million troop camper days in 1973. All 160,000 Girl Scout troops are allowed and urged to go to troop camping if the troops meet camping standards.

Contributing to the safety of troop camping is the fact that the troop is a neighborhood group. The girls know their leaders, the leaders know the girls, and the parents know and have confidence in these adult volunteers who are usually their friends and neighbors.

If troop camping is to fall under the application of this legislation, Girl Scouts of the United States recommends inclusion of a definition of troop camping in S. 3639, as well as a directive to the Secretary of HEW to distinguish its special characteristics from those of resident and travel camping in order to insure the development of appropriate and applicable regulations.

It is in the field of day camping that the many years of experience of the Girl Scout organization is particularly unique. Each year, 500,000 children go day camping at 3,500 Girl Scout day camps, staffed by

50,000 adult volunteers. The camps are usually operated for only a brief period, and are located close to the children's homes.

Campers walk to the site, or have only a short bus ride. Most day camps operate from 9 or 10 in the morning to 3 or 4 in the afternoon, although some operate during the late afternoon and early evening hours.

Most day camp sites are borrowed. That is, the council does not own them, or does not lease them on a basis which is profitable to the leasor. Sites vary greatly. City streets, vacant lots, farm land, club houses of veterans organizations, or public parks may all be used.

Sessions vary from 5 to 10 days in length, and many of the sites are temporary, set up just for the one brief session. Although the total day camp program of each council is usually administered by a member of the professional staff of the local council, the day camp is staffed and set up by volunteers, many of whom are the mothers and fathers of the children.

Since there is little site maintenance expense and few paid staff, fees are very low. Both the low cost, as well as the fact that the camps are operated by community volunteers, and are visible to the citizens of the community, contribute to the success which the Girl Scouts have had in reaching inner city dwellers, ethnic minorities, and the poor, with a summer day camp program.

Girls in isolated rural areas also benefit from day camp—often the only special program for girls in their community each summer. Many of the children who attend Girl Scout day camps will never have an opportunity for other kinds of camping experience.

The health and safety standards of the Girl Scout organization cover all aspects of site selection, personnel, and operation of day camps. The volunteers who serve as staff for the day camps are mature, and are trained for their positions.

Regulations regarding sites and facilities appropriate for the resident camping situation would not necessarily be applicable to the day camping situation, and unless appropriate distinctions are made in the legislation this very vital program which serves nearly 500,000 Girl Scouts each year could be curtailed.

Therefore, we recommand including a definition of day camping in S. 3639 supported by a directive to the Secretary of HEW to give separate consideration to the unique qualities of the day camping experience.

Girl Scouts of the United States first developed health and safety standards for camping early in the 1920's. The standards manual has been revised many times. Copies of the current edition have been submitted to the committee. National staff and volunteers regularly visit council camping programs of all kinds, and submit reports to the boards of directors of the local councils, and to the national Girl Scout organization.

The Girl Scout camping program is vast, diverse, and serves a great many girls. We do not know the figures for other national voluntary agencies, but their camping figures added to ours would indeed add to tremendous numbers of youth served, camps in use, and sites used.

We share your concern that all children may attend any type of camp with the certainty that the program and the site will be op-

erated in such a manner that the campers' experience may be a safe one. Our years of experience in camping have demonstrated to us that safe, healthful camps may be operated in many ways, on may kinds of campsites. We hope the committee will not overlook the different possible designs as we have explained them here for safe camping, and will not apply standards which are appropriate in one camping situation to totally different situations.

We applaud the committee's efforts to develop a comprehensive youth camp safety bill to provide for uniform State standards. We hope you will consider favorably our recommendations that this bill state explicitly that regulations set up various categories of camping; for example, resident, day, troop, travel; and that rules governing the health and safety of children and adults be written according to the exigencies of that particular type of camping with the purpose of providing camping experience in a variety of settings for the maximum number of children at a reasonable price.

Standards which are inappropriate could curtail or eliminate camping programs which have served millions of children safely for many years. If the camping programs of the major youth organizations were to be limited simply because we failed to point out the multiplicity of camping situations, the loss would affect every community of the Nation.

Girl Scouting will continue to support sound health and safety practices. Girl Scouts of the United States of America offers to you, the Department of HEW and the States, the expertise of our staff and volunteers in the development of youth camp safety law and regulations. Thank you.

Senator MONDALE. Thank you.

[The prepared statement of the Girl Scouts of the United States of America as presented by Ms. Pinney follows:]

Girl Scouts of the United States of America

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TESTIMONY

OF

GIRL SCOUTS OF THE UNITED STATES OF AMERICA

BEFORE

SUBCOMMITTEE ON CHILDREN AND YOUTH

OF

THE SENATE

JULY 15, 1974

FOUNDED MARCH 12, 1912
CHARTERED BY CONGRESS MARCH 16, 1950

Girl Scouts of the U.S.A. is grateful for this opportunity to testify before the Senate Subcommittee on Children and Youth on S. 3639, the Children and Youth Camp Safety Act. We heartily endorse the intent of this legislation and offer for your consideration recommendations based on our years of camping experience.

Girl Scouts of the U.S.A. was founded in 1912 and chartered by Congress in 1950 with the purpose of "inspiring girls with the highest ideals of character, conduct, patriotism, and service that they may become happy and resourceful citizens", and has served more than 32 million girls throughout our history. It is the largest organization for girls in the country and operates the largest and most varied camping program for girls. We have always supported standards and practices to insure the health and safety of our youth. We continue to do so.

Today, over three million girls ages six to seventeen are active in more than 160,000 troops assisted by 600,000 adult volunteers. Girls join Girl Scouting to take part in a dynamic program of frequently vigorous activities. Most of all, they join and stay with Scouting because of camping. Ninety-five percent of the Girl Scouts interviewed in a recent survey identified camping as their favorite Scout activity. Each of the basic types of Girl Scout camping -- resident camping, troop camping, and day camping -- has its own unique characteristics and variations, meets particular needs of girls, and provides a special service to the local community.

RESIDENT CAMPING

In Girl Scout resident camping, girls attend as individuals, not with their troop. The resident camp serves girls from the entire council and often includes girls from neighboring councils. Sessions are 6-14 days in length, and camps operate with a staff employed for the entire season. Although sites are generally permanent, facilities vary from being almost resort-like to being quite rugged and rustic. In 1973, 175,000 girls -- both members and non-members --

attended the 450 resident camps operated by local councils. Girl Scout camping standards cover the operation of these camps and the standards proposed by S. 3639 would compliment our existing efforts in this area.

TROOP CAMPING

Troop camping refers to the camping of an ongoing neighborhood group in which responsible adult volunteers who have worked with the children on a regular basis and who have taken training for their jobs as Girl Scout leaders, go camping. The size of the troop, the ratio of girls to adults, the criteria for site selection, and other health and safety factors are regulated by Girl Scout standards. Choice of site, activities, and length of stay are determined by the needs, age, and experience of the girls in the troop and the qualifications of the adult volunteer leadership.

Troop camping, because of the neighborhood base of the troop and the low cost, serves more girls than any other kind of public or private camping in the United States. Our data indicate that there were 3,000,000 troop camper days in 1973. All 160,000 Girl Scout troops are allowed and urged to go troop camping if the troops meet camping standards.

Some troop camping takes place on campsites owned by Girl Scout councils and which are fully developed, that is, they have cabins, sanitary facilities, and fully equipped kitchens. Some takes place at private vacation homes. Other troops use public campgrounds or sometimes completely undeveloped land either privately or publicly owned. On undeveloped sites, girls pitch tents, build primitive sanitary facilities, and cook over open fires. Frequently, all the Girl Scout troops in a neighborhood or community may join together and go troop camping at the same time and at the same site. The fathers of the girls help set up hundreds of these large encampments.

Local councils enforce Girl Scout safety standards for troop camping. These standards include the regulation of personnel and training requirements, sanitation, first aid, food handling, water supply, equipment, swimming, small craft practices, and emergency procedures as well as other matters which affect health and safety.

Contributing to the safety of troop camping is the fact that the troop is a neighborhood group. The girls know their leaders, the leaders know the girls, and the parents know and have confidence in these adult volunteers who are usually their friends and neighbors. If troop camping is to fall under the application of this legislation, Girl Scouts of the U.S.A. recommends inclusion of a definition of Troop Camping in S. 3639 as well as a directive to the Secretary of HEW to distinguish its special characteristics from those of resident and travel camping in order to insure the development of appropriate and applicable regulations.

DAY CAMPING

It is in the field of day camping that the many years of experience of the Girl Scout organization is particularly unique. Each year, 500,000 children go day camping at 3,500 Girl Scout day camps, staffed by 50,000 adult volunteers. The camps are usually operated for only a brief period and are located close to the children's homes. Campers walk to the site or have only a short bus ride. Most day camps operate from 9 or 10 in the morning to 3 or 4 in the afternoon, although some operate during the late afternoon and early evening hours. These unusual hours make it possible for volunteers who work during the day to be counselors at day camp at night and for teen agers to participate in some of the day camp activities.

Although girls may make reservations to attend day camp through their troops, they usually attend as individuals not as part of the troop.

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Most day camp sites are borrowed. That is, the council does not own them or does not lease them on a basis which is profitable to the leasor. Sites vary greatly. City streets, vacant lots, farm land, club houses of veterans organizations or public parks may all be used. Sessions are from 5 to 10 days in length, and many of the sites are temporary, set up just for the one brief session. Although the total day camp program of each council is usually administered by a member of the professional staff of the local council, the day camp is staffed and set up by volunteers, many of whom are the mothers and fathers of the children.

Since there is little site maintenance expense and few paid staff, fees are very low. Both the low cost as well as the fact that the camps are operated by community volunteers and are visible to the citizens of the community contribute to the success which the Girl Scouts have had in reaching inner city dwellers, ethnic minorities and the poor with a summer day camp program. Girls in isolated rural areas also benefit from day camp -- often the only special program for girls in their community each summer. Many of the children who attend Girl Scout day camps will never have an opportunity for other kinds of camping experience.

The health and safety standards of the Girl Scout organization cover all aspects of site selection, personnel, and operation of day camps. The volunteers who serve as staff for the day camps are mature and are trained for their positions.

Regulations regarding sites and facilities appropriate for the resident camping situation would not necessarily be applicable to the day camping situation and unless appropriate distinctions are made in the legislation this very vital program which serves nearly a half million Girl Scouts each year could be curtailed. Therefore, we recommend including a definition of day camping in S. 3639 supported by a directive to the Secretary of HEW to give separate consideration to the unique qualities of the day camping experience.

TRAVEL AND TRIP CAMPING

Travel and trip camping is conducted on the same general basis as troop camping. The major difference is that in troop camping, the troop goes to a specific site and stays for the duration of the excursion. In travel or trip camping the troop moves from site to site. Some councils operate trips on a councilwide basis so that individual girls may make reservations to go on a trip with a group other than her usual neighborhood troop. In these cases -- such as a canoe trip on the river or a backpack trip on the Appalachian Trail -- the counselors may be either volunteers or paid staff. But in any case, Girl Scout safety standards apply.

STANDARDS AND SUPERVISION

Girl Scouts of the U.S.A. first developed health and safety standards for camping early in the 1920's. The standards manual has been revised many times. Copies of the current edition have been submitted to the Committee. National staff and volunteers regularly visit council camping programs of all kinds and submit reports to the boards of directors of the local councils and to the national Girl Scout organization.

Girl Scouts of the U.S.A. offers to you, the Department of Health, Education and Welfare and the states the expertise of our staff and volunteers in the development of youth camp safety law and regulations.

FATALITIES AND INJURIES

We have information on the number of fatalities and serious accidents which occurred in Girl Scout camping in 1973. In that year one camper drowned at a Girl Scout camp. The program was well supervised and the local council which operated the camp was not found negligent in any way.

Girl Scout procedures require the reporting of "serious accidents" to the national organization; however, interpretation of the term serious varies. To

verify camping accident statistics for 1973, we sent out a questionnaire early this year asking again that local councils report to us accidents which occurred in 1973 and defined serious as an accident in which the victim was admitted to a hospital or in which life, function or disfigurement was threatened. From all report sources, we have found 36 children who sustained injuries which local councils deemed serious enough to report to us. When we estimate the total number of camping days involved in all kinds of Girl Scout camping and calculate the injury rate, we find that there were approximately .005 serious injuries per 1,000 camper days. Of the thirty-six injuries reported, 16 resulted from falls, 7 from horseback riding, 3 from snakebite, 2 from winter sports, and 8 from other causes.

RECAPITULATION OF STATISTICS

1. 160,000 Girl Scout troops with 3,000,000 girls enrolled.
2. 175,000 girls attended 450 resident camps in 1973.
3. 3,500 Girl Scout day camps serving 500,000 girls with 50,000 adult volunteers.
4. 3,000,000 troop camper days on thousands of sites (public and private land, Girl Scout and other facilities.
5. .005 serious injuries per 1,000 camper days.

SUMMARY

The Girl Scout camping program is vast, diverse and serves a great many girls. We do not know the figures for other national voluntary agencies, but their camping figures added to ours would indeed add to tremendous numbers of youth served, camps in use, and, sites used.

We share your concern that all children may attend any type of camp with the certainty that the program and the site will be operated in such a manner that the campers' experience may be a safe one. Our years of experience in camping have demonstrated to us that safe, healthful camps may be operated in many ways on many kinds of campsites. We hope the Committee will not overlook

the different possible designs as we have explained them here for safe camping and will not apply standards which are appropriate in one camping situation to totally different situations.

We applaud the Committee's efforts to develop a comprehensive Youth Camp Safety bill to provide for uniform state standards. We hope you will consider favorably our recommendations that this bill state explicitly that regulations set up various categories of camping, i.e., resident, day, troop, travel, and that rules governing the health and safety of children and adults be written according to the exigencies of that particular type of camping with the purpose of providing camping experience in a variety of settings for the maximum number of children at a reasonable price.

Standards which are inappropriate could curtail or eliminate camping programs which have served millions of children safely for many years. If the camping programs of the major youth organizations were to be limited simply because we failed to point out the multiplicity of camping situations, the loss would affect every community in the nation.

Girl Scouting will continue to support sound health and safety practices. We would be happy to furnish the Committee with any additional information we have on health and safety practices or related matters. Thank you.

Senator MONDALE. Mr. Andrews. Please proceed.

Mr. ANDREWS. My name is Ed Andrews, and I am acting executive vice president of the American Camping Association.

I have been requested to state that the Girl Scouts, Campfire Girls, Boys Clubs, YMCA, YWCA, Boy Scouts, all endorse the stand and the recommendations of the American Camping Association, since we asked all of them to participate in the development of these recommendations.

Senator MONDALE. Do your regulations draw distinctions as suggested here between travel camps and day camps, et cetera?

Mr. ANDREWS. Yes, they very specifically do. Throughout our standards, each of the standards, is marked as to applicability to the type of camp it relates to.

We still have some development work to do in some areas, particularly in the area of travel camps.

You brought up the subject of travel camps, and I think it is a growing area, and it is hard to define the difference between what is a travel camp and a tour group. But there are some travel camps that are fine educational institutions that go to specific sites for geological study. They go to Indian reservations for sociological research.

This kind of travel is certainly more than just a tour group. Some of the staff at these camps are outstanding educators.

I feel that we do need to be very definitive in the types of camps that we have.

I submit our testimony to you. I would like to refer to a couple of items in it, particularly the heart of it, which I believe is on page 6.

We are not so calloused to the highly revered uniquely American institution called the summer camp where children are placed in the custodial care of strangers. Thus, it is encumbent upon our profession to take exceptional care to protect the life and limb of America's youth.

1. The American Camping Association believes that all children in all camps should be protected by the best of safeguards. A set of consistent uniform minimum Federal youth camp safety regulations would reach all youth camps.

2. Poor camping experiences and accidents related to unsafe and unhealthy conditions reflect badly on all organized camping, thus undermining the confidence of parents and public.

3. The membership of our association has already committed itself to a high degree of excellence in health and safety, and could only welcome the opportunity to demonstrate their compliance with soundly conceived and fairly applied Federal regulations.

And I would like to add a fourth.

I would like to say that we believe that the youth camp safety regulations promulgated on the Federal level would eliminate a lot of sometimes multiple and duplicate regulations that occur in current laws that make it very difficult at times for camps to operate with the bureaucracy standing over their head.

You realize that the camping season in some camps, for instance, is only 6 weeks long, and if the State fire marshall comes one day, and

the health inspector the next day, and OSHA inspector the next day, the camp director can end up spending 20 percent of his time complying with regulations, or showing his compliance, even if he is operating a good camp.

So we feel that a good set of Federal regulations would actually be beneficial to the operation——

Senator MONDALE. I do not know if there is any way of dealing with that. That is a problem. Businessmen talk to me about that all the time; a new inspector arrives every day and drives them crazy.

Mr. ANDREWS. That is right. Most camp directors, when you speak of organized camp, you are speaking of a community, because it has to have all the services of the community, and the camp director needs to devote his energies and concern to the educational values he is trying to impart to the children. He is trying to give them a fine experience, an educational experience in the out of doors, and if he has to spend all of his time in administrative tasks and details, how can he supervise the staff and run a good safe camp? It is very difficult.

The other thing I would like to point out is that someone mentioned, I believe, earlier that they did not believe that ACA standards should be used as a base for Federal regulations.

We really agree with this. I think it is unfortunate that some people think that ACA standards could be picked up and made the regulations, because frankly, I do not know of but perhaps more than one or two camps in the country that have met 100 percent of the ACA standards.

The ACA standards are more than optimum. We only ask that a camp meet 80 percent of them. Twenty percent of the camps that apply are unable to do so.

We do feel that those prerequisites for membership that we call our mandatory standards, which cover the areas which Mr. Kurman referred to, the certification of the aquatic leadership, and the basic safe ingredients of a camp operation, are in the basic mandatory standards that we do require of all camps who join the association.

Senator MONDALE. Do you have private profitmaking camps in your association?

Mr. ANDREWS. About a third of our camps are for profit.

However, I would like to point out that one of our critical problems today is the economic viability of the independently owned camp. These are the founders of the camping movement in our country, the people who independently went out and took it upon themselves to develop this outdoor program.

What has happened today is that the land values and taxes, and other pressures have made it almost impossible to make a profit on organized camps, and many of them have been unable to stay afloat.

You have to realize that most camp directors are in camping because of their interest in children, and out of doors.

Senator MONDALE. We have to be realistic. I think that is true of many of them, I know many of them, we have marvelous camps in Minnesota, but some of them went in for a fast buck, too, did they not, like in my profession, in the law profession——

Mr. ANDREWS. I think anybody that is in camping for a fast buck is practicing some strange form of masochism, really I do. The average sized camp is about 124 campers. A lot of people do not realize that on 124 campers you still have the same overhead as you do on 500 campers, and the basic cost of operation—you still have to have the same kind of qualified people in the top of every department in the camp.

What has happend is that the majority of those people who are operating private independent camps are working at some other jobs to make a living, the vast majority of them are.

Senator MONDALE. Thank you.

[The prepared statement of the American Camping Association follows:]

TESTIMONY OF THE AMERICAN CAMPING ASSOCIATION

for the

UNITED STATES SENATE SUBCOMMITTEE ON CHILDREN AND YOUTH

Chairman: Senator Walter F. Mondale

July 15, 1974

Mr. Chairman and members of the Subcommittee on Children and Youth, I am Ed Andrews, Acting Executive Vice President of the American Camping Association. Thank you for the opportunity to express the view of ACA on S.3639, Children and Youth Camp Safety Act, and S.1830, Youth Camp Safety Act, providing for regulations to protect the health and safety of children and youth in organized camps.

The American Camping Association is a private non-profit organization of professional, para-professional, and volunteer camping leaders. Since 1910 ACA has progressively and aggressively increased the participation and the quality of camping in the United States.

Our membership represents over half of the 12,000 organized children's camps in the United States and in 10 foreign countries and includes private/independent camp operators, national and local youth agencies, church organizations, schools and colleges and over 125 private and governmental agencies that contribute to the development and quality operation of organized camps. Our stated goals are:

1. To maintain contact with contemporary societal forces as related to camping and to develop appropriate response and action.

2. To enhance the quality of the organized camping experience.

3. To interpret the values of camping to the public.

The majority of our financial and human resources are devoted to our Standards and Leadership Development programs. We are blessed with over 1,600 dedicated hard-working volunteer leaders in 35 Sections encompassing all 50 states. Our members annually provide a quality outdoor experience for over 4 million children, well over half of the 7 1/2 million who attend organized camps each year.

In 1940 ACA initiated a comprehensive educational quality control program providing for the accreditation of nearly 3,000 camps annually with physical on-site visits by skilled professionals at least every 5 years. Today, after two recent revisions involving several universities and thousands of knowledgeable camping practitioners, we have produced a document that has been field tested for reliability, validity and objectivity. It is a very effective measurement tool in four basic sections:

SITE - Includes buildings, grounds and environmental systems

ADMINISTRATION - Includes management policies and procedures used to protect the health and safety of children

PERSONNEL - Evaluates experience, certification, age, and other qualifications related to job responsibility

PROGRAM - Includes evaluation of program objectives as well as an assessment of the effectiveness of the camp in meeting those objectives.

The camp must meet specific minimums in each Standards category as well as achieve an 80% compliance with more than 150 specific Standards.

In addition to the Standards, there are 18 prerequisites for accreditation including compliance with our interracial/interfaith policy and with all federal, state and local laws.

Our Standards "Visitors" are more than just inspectors. They are camping professionals who have a broad base of experience, who have been qualified through a comprehensive training program, and have served an apprenticeship under an experienced Visitor before being qualified to visit and inspect a camp. The "visitation" is a consultation and inspection designed to upgrade the quality of the camp as well as determine its acceptance for accreditation.

It should be noted that not all camps visited are deemed acceptable and just last year about 20% of the almost 1,000 camps inspected were rejected and are being revisited this summer.

You understand that this is a voluntary program. A camp director must invite ACA to make this inspection and then meet the requirements to have his or her camp accredited by the American Camping Association. I have provided for each of you a copy of the Camp Standards with Interpretations, as well as a National Directory listing the currently accredited camps.

We are very proud of our Standards program that has evolved over six decades. These recognized Standards now serve as a guide and goal, not only for ACA accredited camps, but to all in camping as well as to the government agencies on local, state and federal levels.

We are very pleased that ACA has been recognized for the positive action its members have pioneered in developing the most comprehensive camp safety program in the nation. We are deeply concerned that all other youth camps should be made just as safe for children.

This is why, since 1966 when Senator Ribicoff first introduced the Youth Camp Safety Act and similarly since 1968 when Representative Daniels first introduced his Youth Camp Safety Act in the House, the National Board of Directors with the support of our local Section leadership and membership has strongly backed and supported the concept of good federal youth camp safety legislation.

Certainly some of our members do not agree with our stand. We may even have lost some members over it, but their objections, let me assure you, have nothing to do with their concern for the safety of children - only the manner in which this safety is achieved. On one goal, youth camp leaders of this country are absolutely united; that of wanting to operate a safe and healthful camp for boys and girls entrusted to them. This is not only from the dedication and heartfelt concern for children that these people have, but it is also vital for the professional administration of an effective program.

Better than anyone else, members of the American Camping Association know there are some camps that are not safe. Some reasons for this would be lack of leadership, training or experience, lack of funds for proper facilities and equipment, or perhaps lack of good judgment.

May I call your attention to some practical aspects of safety in camps:

A. In July of 1971, the Department of Health, Education and Welfare produced a report that indicated there were more than 250,000 injuries among the more than 7 million children in summer camps during that summer. The study concluded that:

1. Sixty percent of the 18 million annual injuries to children under the age of 16 occur at home.
2. The 5 million injuries reported for school children from 6 to 16 years of age make an accident injury rate of 150 per thousand population each year.
3. That the 250,000 injuries which were estimated to occur in youth camps each year established a rate of 31 per thousand per year. Even counting the exposure time differential, this is a very heartening endorsement of the outstanding safety record of youth camps.

B. The recently completed report on youth camp safety by the Department of Health, Education and Welfare gave absolutely not the slightest hint that camps were any less safe than almost any other youth activity. In fact, the report supported their previous contention that camps just may be safer than any other program.

C. Insurance statistics definitely support the possibility that organized camping is among the safest activity for children and youth in our country.

Why then, does the American Camping Association support what some people might look at as "imposition" of bureaucratic regulations upon our profession?

There are some who have called to the attention of Congress and the public "tales of horror" involving serious injury in camp activity and also in many other camp-type and related activities. Now I live in a town of only 60,000 people and during the camping season, when over 7 1/2 million children are in summer camps, there are more "tales of horror" spread upon the pages of our local newspaper in my town than anyone even claims occur in summer camps of our nation. I fear, however, that we have become jaded by traffic fatalities, drownings at the beach, construction accidents, and home fires and falls.

We are not so calloused to the highly revered uniquely American institution called the summer camp where children are placed in the custodial care of "strangers." Thus, it is encumbent upon our profession to take exceptional care to protect the life and limb of America's youth.

1. The American Camping Association believes that all children in all camps should be protected by the best of safeguards. A set of consistent uniform minimum federal youth camp safety regulations would reach all youth camps.
2. Poor camping experiences and accidents related to unsafe and unhealthy conditions reflect badly on all organized camping, thus undermining the confidence of parents and the public.
3. The membership of our Association has already committed itself to a high degree of excellence in health and safety and could only welcome the opportunity to demonstrate their compliance with soundly conceived and fairly applied federal regulations.

Thus, the American Camping Association has joined with other camping organizations, as well as the national youth agencies of the country, in support of youth camp safety legislation and has devoted a considerable amount of time and consultation with camping people across the country to not only show camping people the value of such legislation but to assist you, the legislators, in the enactment of the strongest and best possible kind of legislation that will not only make camps safer but will benefit the growth and development of the outstanding education opportunities that camping has to offer.

To assure a clear understanding of the proposed legislation and to be of continued assistance to Congress, the American Camping Association has twice sponsored national consultations on this legislation, once in November 1966 and most recently January 16-17 of this year in New York City. Attending the 1974 consultation were 31 representatives from youth camping organizations representing the total spectrum of organized camping.

The conference developed a position paper which was distributed to all participants, to all youth camping organizations, to the legislators involved, and to the ACA National Board, to the officers of the five ACA Regions and to the Presidents of all 35 ACA Sections. The proposals were reviewed and refined when in February over 1,400 camping leaders gathered at the ACA National Convention in Atlanta.

The overwhelming majority of camping people supported this position paper in concept and in detail. We hope that these findings will be of value to this committee.

A. THE AMERICAN CAMPING ASSOCIATION CONCURS WITH AND WHOLEHEARTILY SUPPORTS THE INTENT OF THIS BILL AND COMMENDS ITS SPONSORS.

B. THE AMERICAN CAMPING ASSOCIATION STRONGLY RECOMMENDS THAT FURTHER CONSIDERATION BE GIVEN BY THIS COMMITTEE AND CONGRESSIONAL LEADERS IN COMBINING FEATURES OF BOTH HOUSE AND SENATE BILLS TO THE MODIFICATION OR CHANGES OF SEVERAL SALIENT ELEMENTS IN ORDER TO STRENGTHEN THE LEGISLATION. I MIGHT ADD PARENTHETICALLY THAT THE ACTION OF THIS COMMITTEE IN THAT DIRECTION IS VERY ADMIRABLE AND WE ARE MOST APPRECIATIVE OF YOUR CONSIDERATION OF BOTH BILLS.

C. THE CONSULTATION RECOMMENDED THAT SPECIAL ATTENTION BE GIVEN TO THE FOLLOWING LEGISLATIVE AREAS AS PREREQUISITES TO THE AMERICAN CAMPING ASSOCIATION"S FULL SUPPORT TO THIS SPECIFIC FEDERAL LEGISLATION:

1. The direct utilization and continuing involvement of responsible camping leaders and practitioners in the legislative and administrative process needs to be clearly defined and provided for.

    a. The role, functions, and composition of the Federal Advisory Council as well as all State Advisory Councils should include wise involvement of camping leaders.

    b. Advisory Councils must be involved in the developmental process for implementation, in decision-making, in setting minimum standards, in the establishment of reasonable penalties, and as ombudsman in the administration of the penalty.

    c. Advisory Councils must be strongly represented by all segments of camping and by recognized authorities in the camping field.

2. Coverage in the legislation should include all components of organized camping plus recreational and educational groups, programs, or clinics which have characteristics similar to camping.

3. The Federal government will have ultimate responsibility for the law and its minimum standard provisions as well as for encouraging uniformity among the states. Implementation, however, must be the responsibility of the states.

4. Travel camps should be governed by the laws of the state at the point of origin. Federal enforcement and administration would be impractical and difficult.

5. A time schedule for federal and state implementation with provision for continued funding should be included in the law.

6. The training of all administrative inspector personnel should be defined, taking full advantage of the American Camping Association's Camp Visitor Training program.

7. The Standards of the American Camping Association should be utilized as a fundamental resource in the development of governmental minimum standards. ACA Standards, which are nationally recognized, will continue to set Standards of excellence that will far exceed minimum Standards provided by law.

8. The state Youth Camp Safety implementation should be funded from the public treasury, either federal or state or both. It is of deep concern that the states do not try to make up any possible difference between federal grants (80%) and implementation costs by charging camps licensing and inspection fees or to make up for any possible future cuts in federal budget.

9. In the past, Congress has been receptive to the idea of avoiding multiple legislative coverage of a situation or a group where an authority with obvious expertise already occupies the field.

   Example: Sailors are employees - OSHA has general jurisdiction over the safety of employees, but the Coast Guard, with far greater knowledge and experience with safety at sea, has been given jurisdiction over sea-going employees. In the interest of conservation of both time and public funds, it is recommended that state Youth Camp inspectors be given similar jurisdiction.

10. The bill encourages public advertisement of governmental approval which offers unwarranted reliance by parents when the camp has only met minimal camp standards. Thus, it creates a false sense of security which is neither intended or desired. Such promotion also negates efforts for reaching to higher camping standards as exemplified by ACA. They should be clearly promoted as minimum standards.

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These are our basic recommendations. Members of our National Board of Directors, the officers and staff of our Association, our colleagues from the national youth agencies offer to you our time, expertise, data and talents in any way we may assist in developing a meaningful law.

We realize that not all camps in the nation can adhere to the optimum standards advocated by the American Camping Assocation, but we do believe that all camps can and should meet fundamental regulations for health and safety that will be promulgated by the youth camp safety legislation. The preceding recommendations will, we believe, strengthen this proposal and produce legislation of which we can all be proud and which we can wholeheartily support. We offer you our continued full cooperation to this end and on behalf of the officers, Board, membership and staff of the American Camping Association, I thank you for your consideration, your time and your courtesy.

Respectfully submitted,

Ed Andrews
Acting Executive Vice President

American Camping Association
Bradford Woods
Martinsville, Indiana 46151
Phone: 317-342-8456

Appendix forwarded under separate cover:

1. Recommended makeup of Federal Camping Advisory Boards
2. Recommended makeup of State Camping Advisory Boards
3. Recommended amendments in relation to S.3639
4. "Standards" publication of the American Camping Association
5. Membership Directory of the American Camping Association

APPENDIX TO THE

TESTIMONY OF THE AMERICAN CAMPING ASSOCIATION

for the

UNITED STATES SENATE SUBCOMMITTEE ON CHILDREN AND YOUTH

Chairman: Senator Walter F. Mondale

July 15, 1974

CONTENTS AS FOLLOWS:

1. Recommended makeup of Federal Camping Advisory Boards
2. Recommended makeup of State Camping Advisory Boards
3. Recommended amendments in relation to S.3639
4. "Standards" publication of the American Camping Association
5. Membership Directory of the American Camping Association
6. Observations on Current Senate Youth Camp Safety Bills

APPENDIX ITEM #1

AMERICAN CAMPING ASSOCIATION FEDERAL YOUTH CAMP SAFETY ACT

RECOMMENDATIONS FOR PERSONNEL OF

FEDERAL ADVISORY COUNCIL - 18 Members

Chairman - Secretary of HEW or designate

1. Additional representative of HEW
2. Bureau of Outdoor Recreation
3. U. S. Department of Agriculture
4. National Safety Council
5. American Medical Association
6. National Education Association
7. National Park and Recreation Association

(Among the following it is important that there be grass roots representation of various segments of camping, race, color, creed and sex and of the five ACA regional areas of the United States.)

8. American Camping Association President and/or Executive Vice President
9. Chairman, National Camp Executives Group
10. Vice President for Private/Independent Camping
11. Church Camping Committee Chairman
12. Christian Camping International, Executive Director
13. Day Camping
14. Travel Camping
15. Camper - Consumer
16. Parent - Consumer
17. State Administrator experienced with State Legislation (e.g. Dr. Barrett, Connecticut)
18. Geographical or grass roots representative.

APPENDIX ITEM #2

AMERICAN CAMPING ASSOCIATION — FEDERAL YOUTH CAMP SAFETY ACT

RECOMMENDATIONS FOR PERSONNEL OF

STATE ADVISORY COUNCIL - 18 Members

Chairman - State Department responsible for implementation

1. Additional representative of State Department of implementation
2. U. S. Department of Agriculture
3. American Medical Association
4. National Safety Council
5. State Parks
6. State Department of Social Service
7. State Bureau of Child Welfare
8. Experienced camp inspector
9. Private Camp-director
10. Agency Camp-director
11. Church Camp-director
12. Day Camp-director
13. Travel Camp-director
14. Handicapped Camp-director
15. Camp director - additional geographical area
16. Camp director - Year round outdoor education
17. Camper - Consumer
18. Parent - Consumer

* These members (i.e. #9 - 16) should also include an elected officer of the local American Camping Association Section and the President of the state camp organization.

Note: Members of State Councils should either be residents of the state and/or if camp directors, their camps be located in the state or active in an organization of the state.

APPENDIX ITEM #3

RECOMMENDED AMENDMENTS TO S.3639, "THE YOUTH CAMP SAFETY ACT," with references to testimony of the American Camping Association on July 15, 1974, before the United States Senate Subcommittee on Children and Youth, Senator Walter F. Mondale, Chairman.

1. RELATING TO THE MAKEUP AND ROLE OF THE FEDERAL AND STATE CAMPING ADVISORY BOARDS:

(Note: Specific makeup of Advisory Council (fed) and Boards (state) are specific parts of the appendix and listed separately).

Page 4, Sec. 5, line 12: Following "Secretary" insert "in consultation with the Advisory Council."

Page 5, Sec. 5, (b) (5), line 16: Delete "provides for an advisory committee" and insert "establish the recommended State Camping Advisory Board to serve as adjudicators, ombudsmen and consultants to the State, and,"

Page 10, Sec. 9 (c) line 5: After "Secretary" delete remainder of sentence to line 9 "....at the camp" and insert "a copy of the complete daily medical log for the camping season. The Secretary shall then compile and summarize the logs so reported for appropriate study, review and recommendations by the State Camping Advisory Board."

Page 12, Sec. 11, line 25: Add "(d) the State Camp Advisory Board shall have prime-facie jurisdiction in adjudication violations and setting penalties therefore, and shall serve as a review and appeal body in disputes between any given camp within said State and the findings of a State Camp Inspector. The Federal Camping Advisory Council shall serve as the final administrative-regulatory body for the review of actions within a State prior to considerations of the courts jurisdictions as described herein."

2. RELATING TO PROPER COVERAGE, DEFINITION OF "CAMP" AND PROTECTION OF ALL CAMPERS:

Page 1, Statement of Purpose, line 7: After "travel" delete "Camps by" and insert "programs, youth recreation programs, or sports, arts or outdoor clinics or programs whose characteristics are similar to or advertised or understood to be similar to camping, by."

Page 2, Sec. 3 (1) (A) line 16: Following "resident camp" insert "including any camp operated by any government agency or subdivision thereof on federal, state or local level."

Page 2, Sec. 3 (1) (B), line 17: Change word "Camp" to "program."

Page 13: Delete Sections 12 and 13. Insert: "Sec. 12, VARIATIONS - Within the guides of the Federal Advisory Council, the State Camping Advisory Board shall ratify and approve any application for variance or exemptions pertaining to any standard, for reasons of undue hardship, special program considerations or extraordinary circumstances, following inspection and determination of a field inspector. Any such ratification and/or approval shall be for an individual camp and not construed to establish substandard operations for any class of camps, and such applications for variance or exemption shall be made annually."

"Sec. 13, TRAVEL CAMPS: All travel camps or travel programs shall register as prescribed with the governing agency of the State of origin, and shall carry evidence of such registration, compliance and approval when traveling in other States. Injuries, accidents and illnesses requiring professional medical treatment occurring when outside the State of origin, shall be reported to the governing agency within the State in which medical treatment was made and a copy of said report, as well as all normal reports, shall be sent to the State of origin as well. The State Camping Advisory Board shall determine the rules, regulations and qualifications of personnel, equipment, supervision, itinerary and other pertinent details for granting annual registration for travel groups in the State of origin under the national guides of the Federal Advisory Council."

3. RELATING TO CONFORMITY, UNIFORMITY AND STATE IMPLEMENTATION:

(This change is designed to recognize that in the short span of a 60-day camping season, it would be impossible for a federal agency to visit and inspect more than 15,000 resident, day and travel camps in the nation."

Page 4, Sec. 6 (a), line 16 to 20: Delete. Insert (1) "Each State shall assume responsibility for development and enforcement of the youth camp safety standards described herein and for the establishment of the State's Camping Advisory Board, and shall submit at a time indicated, the State's plan for development of such standards and their enforcement. The guidance of the Federal Advisory Council and the guidance of nationally recognized professional camping standards shall be utilized by the State authority."

4. SPECIAL CONCERNS RELATING TO TRAVEL GROUPS:

Ibid, above.

5. CONCERNS FOR TIME SCHEDULE, IMPLEMENTATIONS AND FUNDING:

Page 4, Sec. 6 (a) as amended above: Add "(2) Enforcement and implementation of the State's camping regulations, following approval of the State's plans by the Secretary, shall take effect within one year of said approval by the Secretary."

Page 6, Sec. 6 (b) (11) Line 16, and (10) Line 13: Add "State funding shall not be contrued so as to permit a financial burden on any camp nor groups of camps as a fee, charge or license and no such charge to any camp shall be in excess of twenty-five dollars ($25.00) per annum, and all other fundings by the State shall be from the public treasury as a public service, to its citizens and to the citizens of other States attending a camp therein."

6. CONCERN FOR PROFESSIONAL TRAINING OF INSPECTOR PERSONNEL:

Page 6, Sec. 6 (b) (7) line 4: Following "such standards." Add "The training and development of qualified inspector personnel with expertise in youth camp operations shall make full utilization of nationally accepted training standards and existing programs for such personnel. Utilization of such inspector training prgrams shall not be construed so as to curtail fees or payments by the State to any organization or association for its services in conducting an established training program for assuring the qualification of state camping authorities or inspector personnel. Such

State personnel may similarly take advantage of the training and expertise of any federal program for training of camp inspectors or of a program conducted by a recognized authority in the field of camping expertise approved by the Secretary or the federal camping advisory council."

7. CONCERN FOR TESTED, BASIC SAFETY STANDARDS BEING INCORPORATED IN FEDERAL AND STATE REGULATIONS FOR ESTABLISHING THE GOVERNMENT'S MINIMAL SAFETY GOALS:

Page 4, Sec. 5, line 6: Following "youth camp safety standards." Insert "These standards shall take full recognition of established, and tested national standards of professional camping associations now in existence with regard to basic, minimal regulations for health and safety."

8. CONCERN FOR FUNDING AND POTENTIAL ECONOMIC HARDSHIP ON CAMPS AND BASIC ATTITUDE FOR ESTABLISHING A PUBLIC SERVICE FOR THE PUBLIC GOOD FROM PUBLIC TREASURY:

Ibid, #5 above.

Page 8, Sec. 7 (a) and (b): Insert"(c) In the event of reductions or elimination of federal funding to implement the State's plans, the State shall provide any additional funds as may be needed from the public treasury and shall not levy any additional fees or taxes upon the camps above the maximum allowed by federal law, as provided in Sec. 6 (b) in the maximum amount of twenty-five dollars (25.00). It is not the intent of this regulation to impose a financial burden on the camps."

9. AVOIDANCE OF DUPLICATION AND MULTIPLICITY OF LAWS AND ADDED PUBLIC EXPENSE:

Page 9, Sec. 9 (b), line 22-25: Delete and insert "For the purpose of this Act and for hearings and investigations pertaining thereto, under the quality of expertise established herein, these regulations shall supercede the provisions of the Occupational Health & Safety Act of 1970 and compliance with acceptable Youth Camp Safety Standards by any camp shall be considered as primafacie evidence of compliance for OSHA requirements. The inspecting authority shall take into consideration the unique environment pertaining to camping and the basic rustic conditions inherent in camp life as a specialized method of operation. It is not the intent of the regulations in this part to place additional responsibilities or duties upon the camps nor to relieve said camps of responsibilities or duties now placed upon them by law, regulation or custom, but to provide understanding of the mode of life inherent in camping as affects all persons in the camping community be they adults or youth. The recommended practices for personnel and camp staffs now accepted in practice by professional camping association standards shall be used as guides in this area, and shall be designed to avoid duplication or multiple legislative coverage in an area calling for specific expertise."

(NOTE: The Congress has been receptive to many similar conditions and to saving of public funds, in parallel situations such as Coast Guard jurisdiction for safety of seamen; for the FAA for airline crews; the Bureau of Mines for that industry, etc.)

10. PROMOTIONAL ASPECTS AND SIDE EFFECTS, MISUSE AND MISUNDERSTANDING BY THE PUBLIC:

Page 1-2, Statement of Purpose, line 5 (pg. 2): Add "It is the purpose of this Act to establish consistent, minimal, basic standards for health and safety in youth camps. Such minimal, basic standards are not to be construed as duplicating or replacing more advanced or more elaborate standards of any professional camping organization, association or society nor are they in any way to be considered as restrictive to developmental or educational goals designed to enhance the art of professional camping by those experts in the field. This Act and implementation thereof shall not be construed to offer the camping public and parents of youth attending said camps any grading, rating or evaluation of any camp other than that said camps meeting of requirements provided herein. The public promotion or advertising by any camp deemed to have complied with the demands of this Act shall be limited to the words 'has met minimal government standards for health and safety as provided by the Youth Camp Safety Act, Public Law #___ ' and shall not be made in any way to entice or mislead the public as to adhering or sanctioning of any greater operating standard. The continued upgrading of all camps for health, safety, program and educational goals by professional camping associations, societies and organizations shall be encouraged whenever possible."

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A Listing of
American Camping Association

STANDARDS FOR ORGANIZED CAMPS





AMERICAN CAMPING ASSOCIATION
Bradford Woods
Martinsville, Indiana 46151

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STANDARDS FOR ORGANIZED CAMPS

From the first group of academy students taken on a two-week camping experience by their headmaster in 1861, organized camping has had a phenomenal growth. It is estimated that there are now well over 10,000 organized camps serving in excess of 7,000,000 campers. In serving these, organized camping provides a creative educational experience in cooperative group living in the out-of-doors. It utilizes the resources of the natural surroundings to contribute significantly to mental, physical, social and spiritual growth of the campers. Organized camps are established, owned and/or operated by youth serving agencies, private individuals and groups, schools, churches and other related organizations.

The American Camping Association, a non-profit professional organization of camping interests, was founded in 1910. One of its major contributions to organized camping has been the development of *standards for camping*. The purpose of the ACA Standards program is to protect campers by examining the operation of the camps in light of acceptable performance criteria. No camp can claim it is an accredited ACA camp member unless it has been officially visited and is known to comply with these Standards and is in current good standing as an *ACA Accredited Camp*.

This booklet contains a listing of the questions asked in the ACA Standards visitation. Because of the wide variety of camps, some of the questions listed here may not apply to a specific camp. For a full presentation of the Standards, use the order form inside the back cover of this booklet to order your copy of *American Camping Association Camp Standards with Interpretations*.

PROCEDURES FOR ACCREDITATION

An orderly procedure is followed for accreditation of camps. While accreditation may be initiated through application for membership to the National Office, accreditation is the responsibility of the Sections of the American Camping Association. The specific procedures may vary from Section to Section, but the basic steps are the same. They begin with the monthly membership report sent from the National Office to the Sections and culminate with the action recommended by the Section Standards Committee to the Section Board.

In the following pages are set forth the procedures for a new camp seeking membership which must be visited for the first time and for camps which are being revisited because (1) the first visit resulted in a provisional membership, (2) the camp owner or site has changed, (3) the maximum time (five years) between visits has lapsed or (4) the first visit determined the camp was ineligible for membership, such as failure to meet prerequisite Standards, but the camp subsequently became eligible.

Often the question is asked, "Who are the visitors?" inasmuch as so much of the camp's membership rests on the report made by the visitors. The camp may be visited by only one or by a team of two or more trained visitors. Where there are two or more, one person, usually the most experienced, is designated as the lead visitor. Camp visitors are ACA members who are experienced in camping and certified by the Sections and the National Standards Committee after satisfactorily completing the ACA training program.

Procedures for Accreditation—New Camps

Specific procedures are carried out by the American Camping Association, both at the National and at the local Section level during the accreditation process. These are designated as "ACA-Step." In order to complete this process, specific steps (Camp-Step) are followed by the camp director or the camp representative of the camp seeking accreditation.

Camp-Step 1: A *camp* representative writes to the National Office, American Camping Association, Bradford Woods, Martinsville, Indiana 46151, indicating interest in camp membership in the ACA.

ACA-Step 1: The *National Office* returns a camp membership application form, including the Statement of Compliance and the Prerequisites for Membership. See Appendix A.

Camp-Step 2: The *camp* representative, board, director, et al, reviews the materials received from the National ACA and returns the completed Application for Camp Membership to the National Office.

Preparation for the camp visit commences prior to the signing of the Statement of Compliance. All five statements should be studied by the applying camp with additional attention given to the Prerequisites for Membership Standards. The Standards themselves should also be closely examined and efforts initiated to work toward complying with those which the camp does not already meet. Using the Standards as a guideline will also be helpful in the preparation for the forthcoming camp season.

ACA-Step 2: On return of the membership application, the *National Office* informs the Section Standards Chairman through the monthly membership report of the camp's

desire for membership and, thus, visitation for accreditation. From this point through the entire process of accreditation, the local Section makes the visit and recommends accreditation and thus, camp membership.

ACA-Step 3: The National Standards Committee establishes a specific schedule priority for visitation. All new camps are given priority category #1.

The *Section Standards Chairman* contacts the camp, requesting completion of a brief questionnaire and provision of some basic information, including:

a. Stated best days for visit and days when visit would be convenient
b. Name, address and phone of person to be the camp visit contact for completing arrangements
c. Length of camp operation and defined periods
d. Address, phone and type of camp
e. A well-defined route and/or map with directions to the camp
f. Type of visitation (basic camp accreditation, site accreditation only)
g. Information of any special program or circumstance
h. If on-site director of camp is different from person who is administratively in charge, confirmation that the on-site director not only has and understands the Statement of Compliance and the Prerequisites for Membership Standards but also is being kept fully informed of the visitation arrangements.

Camp-Step 3: The *camp* returns the questionnaire to the Section Standards Chairman as well as the basic information form.

ACA-Step 4: On return of the basic information form, the *Section* sends further visitation information to the camp representative who processes all designated materials within established deadlines and is the main contact to the Section. The information includes:

a. Listing of written materials needed to complete visit. See Appendix B
b. Standards book and scoring sheet
c. Approximate date of visit, visitors assigned, and visitation arrangements
d. Copy of letter sent to visitor(s) assigned; it designates lead visitor, and may include a general description of a typical visit.
e. Statement that the stockholders, camp committee, camp chairman, agency board or interested persons related to camp are welcome to participate in the visit.

The assigned *lead visitor* makes final arrangements for the visitation with camp representative.

Camp-Step 4: The *camp* representative confirms the visitation date with the lead visitor and further prepares for the accreditation visit. He collects required written documents, informs other appropriate persons related to the camp of the visitation date and requests their presence if so desired, and completes other arrangement details.

ACA-Step 5: The accreditation visit occurs.

ACA-Step 6: The *lead visitor* of the Section *Immediately after visit returns white copy* to American Camping Association, Bradford Woods, Martinsville, Indiana 46151; pink copy to Section Standards Chairman; blue copy retained by camp director; yellow copy retained by camp visitor.

ACA-Step 7: The *National Office* sends the results of the visit (score) to the Section Standards Committee. The Committee makes recommendations for each camp's classification, that is, accredited member site approved, provisional member, or not eligible for membership.

ACA-Step 8: The *Standards Committee* presents its recommendations to the *Section Board* (usually first meeting in early fall) which votes on the recommendations and notifies the National Office of its decisions.

ACA-Step 9: *Section Board* transmits action in writing to:

a. Each Camp and responsible persons
b. National Headquarters of the American Camping Association
c. Section Membership Committee
d. Other responsible groups as determined necessary by each Section

There is also an orderly process for appeal and this can be ascertained by immediate letter from the camp to the Section President upon notification of visit results. A copy of the letter should be addressed to the Section Standards Chairman.

Procedures for Revisitations

A camp must be revisited when:

1. It was ineligible and subsequently became eligible
2. It received a provisional rating
3. A new owner or change of site occurs; or
4. A time lapse of five years has occurred since the previous visit

Step 1. Section Chairman receives the American Camping Association's monthly membership report that indicates status of all camps in his Section. The Section has a record of each camp and its classification, double-checking the national record.

Step 2. Standards Chairman checks membership status with visitation reports received from the National Office and confirms the priority of each camp according to the following:

(1) Priority #1 for visitation
   a. New camps
   b. Provisional

(2) Priority #2 for visitation
   a. New owner or change of site
   b. Revisitation (maximum time lapse is five years)
   c. Previously ineligible camp reapplying

(3) No visitation or no action taken at this time

Step 3. From this point on, the procedures for revisitation are the same as for new camp visitations. Begin with ACA-Step 3 under new camp visitation procedures.

PART I-A
SITE STANDARDS

If a site is leased to different camp operators or organizations, that site may be visited separately from the camp operation and approved as a site. Such approval includes the general aspects covered in this section and those specific aspects covered under Part II Standards for Specialized Programs and Activities. In order for a site to be approved for use for specific programs and activities, the Standards appropriate to such activities offered must be applied during the visitation process. The concept of site approval, including the feasibility and the mechanics of site approval will be further studied during the next biennium. An approved site should not be confused with an accredited camp. An accredited camp must operate on an approved site wherein all the Standards applying to that specific camp would be evaluated in the visitation.

This symbol (*) indicates Prerequisites for membership

1. Is there a written master site plan for the development and management of land, buildings and other structures, and utilities?
2. Does the site or accessible areas provide natural resources to enrich an outdoor living experience?
3. Is there a written plan for environmental quality control of resources on the site?
4. Is there a written plan regarding risks to humans from both natural and manmade site hazards that is implemented through the following:
   a. Identification of risks
   b. Establishment of regulations
   c. Provision of protective devioes, and
   d. Elimination of hazards where feasible?
5. Is there fire and extended coverage insurance?
6. Is there comprehensive liability insurance?
7. Are there inventories of all facilities and of all non-expendable equipment?
8. Are arrangements made annually with local or state fire officials for protection of camp in case of fire?
9. Has the type, number and location of fire extinguishers and the fire-fighting equipment, fireplaces and chimneys, and all other fire areas, been approved at least annually by insurance officials, fire extinguisher service companies, or the local fire or forest officials?

*10. Has the person in charge verified that the water supply for all purposes is approved by the government or by an independent laboratory at least annually for year round camps, or immediately prior to the occupancy of a seasonal camp?

11. Does the camp have available, on the site, blue prints or charts indicating the location of all utilities and sanitation lines and cut-off points?
12. Are all food preparation and storage areas constructed so that they are rodent and vermin-proof, able to be maintained free of dirt and accumulated grease, and well lit and well ventilated?
13. Do permanent sleeping units provide the following:
   a. Cross ventilation
   b. (space) 40 square feet per person
   c. At least 6 feet between heads of sleepers, and
   d. At least 30 inches between the sides of beds?

14. Do all sleeping accommodations not on the ground level have fire escapes and protective devices?
15. Are toilets adequate in number based on the following ratio of seats per person:
    a. Resident camps - one seat for every 10 persons
       (1) If all male camp, in addition one urinal for every 30 persons
       (2) When toilet facilities are in camper residence units, minimum of 2 seats if more than 5 in the unit, with a ratio of 1 seat for every 10 persons.
    b. Day camps - one seat for every 20 persons, or if all male camp, one seat and one urinal for every 30 persons
    c. Single family residence unit - one seat per unit?
16. Are toilet facilities vermin proof, well ventilated and in repair?
17. Are handwashing facilities adjacent to the toilets?
18. Are handwashing facilities provided in a ratio of one wash basin per 10 persons with a minimum of two basins or equivalent for each facility?
19. Does the camp provide bathing facilities with enough warm water for all in camp?
20. Are written policies regarding the use of the site given to the director of each rental or leasee group?

PART I-B
ADMINISTRATION STANDARDS

This symbol (*) indicates Prerequisites for membership

*21. Does the camp have a written statement of goals with specific objectives in terms of camper development?
22. Has the camp reviewed and modified, as deemed necessary within the past three years a written comprehensive plan which is based on a statement of goals?
23. Does the camp have a systematic procedure for evaluation which:
    a. Analyzes all areas of camp operation
    b. Is conducted annually, and
    c. Involves campers, parents, staff and, if existing, the camp board or committee of the sponsoring agency?
24. Does the camp use three or more of the following approaches to parent-camp communications:
    a. Pre-camp registration interviews
    b. Visit to camp
    c. Telephone conversations or personal contact
    d. Exchange of letters of campers and staff with parents
    e. Newsletter
    f. Reports or memos to parents
    g. Questionnaires
    h. Parents' Day
    i. Parent meetings?
25. Does the camp have the following information at the site for each person in camp:
    a. Full name of each individual
    b. Age
    c. Home address
    d. Home phone
    e. School grade, where applicable,
    f. Name, address, home phone and signature of adult responsible for each individual, and
    g. Phone numbers of persons to be contacted in case of emergency during the individual's stay in camp?
26. Does the camp have a written agreement of employment with each staff member which includes the following:
    a. Salary or wages
    b. Term of employment
    c. Benefits, and
    d. Reference to job description and personnel policies, if existing?
27. Does the camp have written personnel policies which provide the staff with the following information:
    a. Remuneration
    b. Time off
    c. Absence from work
    d. Medical examinations and health histories
    e. Insurance
    f. Conditions of severance
    g. Performance evaluation
    h. Personal conduct, and
    i. Special conditions of service?
28. Does the camp have written job descriptions for all administrative personnel?

29. Does the camp have written job descriptions for all program and health personnel?
30. Does the camp have written job descriptions for all support personnel?
31. Does the camp provide each staff member with a copy of the camp's staff organization chart?
32. Does the camp have a budget?
33. Does the camp have the following food records:
    a. Menus
    b. Records of purchases, and
    c. Inventories: or, if food services are contracted, such records shall include menus and number of meals served?
34. Does the camp have inventories of all non-expendable equipment?
35. Does the camp have comprehensive liability insurance?
36. Is each camper covered by health and accident insurance?
37. Is each staff member covered by workmen's compensation insurance?
38. Is each staff member covered by health and accident insurance?
39. Does the camp have motor vehicle insurance?
40. Does the camp have employer's non-ownership, liability insurance?
41. Does the camp have insurance covering hired and leased vehicles?
*42. Is a health history prepared and signed by parent, guardian, or other adult responsible for the individual required of everyone in camp and does such history include at least the following:
    a. A record of medical treatment, immunization and allergies, and
    b. Description of any physical conditions requiring special consideration.
43. Is a physical examination by a licensed physician required for all in camp within 12 months before camp or upon arrival at camp?
*44. Is the physical condition of everyone screened immediately before departure for or upon arrival in camp by a licensed physician, registered nurse, or licensed practical nurse?
*45. Does the camp maintain health records, including:
    a. Health screening, health histories and other statements regarding any limitations which would affect participation in activities, and
    b. A record of accidents, first aid and medical treatment of everyone in camp for a period of federal statutory limitation?
*46. Does the camp have an infirmary, first aid facility, or similar area to handle health and emergency cases?
47. To provide medical service and health supervision, does the camp have on site a physician, registered nurse, or a Christian Science graduate nurse?
48. Does the camp have on duty at all times a person with current ARC advanced first aid certification or the equivalent to provide first aid service?

49. Does the camp have arrangements with an accredited hospital or with a nearby licensed physician to be on call?
50. Does the camp have a written outline or procedures for health supervision?
51. Are all narcotics and medications stored under lock and dispensed only under the specific directions of a licensed physician?
52. Are all staff members furnished written health and accident emergency procedures which are approved by both camp physician and legal counsel and given training in their use?
53. Are all staff members provided written disaster procedures which are practiced?
54. Does the camp have a written search and rescue procedure for persons lost, missing, or runaway?
55. Does the camp have an emergency communication system?
56. Does the camp have its menus planned or approved by a nutritionist and/or dietician?
57. Does the camp comply with following provisions of health requirements for food service staff?
    a. All persons with long hair shall wear nets; cooks and bakers with short hair shall wear caps or nets,
    b. All persons shall wear clean, neat, and practical clothing,
    c. Smoking in the kitchen shall be prohibited.
58. Does the health supervisor check food service personnel on a regular basis for symptoms of ill health?
*59. Are milk and other perishable foods maintained at a temperature of not over 45 degrees fahrenheit?
*60. Is all sewage disposed of in a public sewage system, or in the absence thereof in a manner approved by the local health authority?
*61. Is all garbage and rubbish containing food wastes, prior to disposal, kept in leak-proof, non-absorbent containers which are covered with tight-fitting lids when filled or stored, or not in continuous use?
*62. Are the food service utensils cleaned and disinfected after each use in accordance with the following process:
    a. Scraped free of food particles,
    b. Washed in hot (minimum 100 degrees F.) water containing soap or detergent,
    c. Rinsed in clear, hot water,
    d. Rinsed again in clear water at 180 degrees F. for 30 seconds or equivalent commercial dishwashing machine process. (If thermometer is not available to check temperature, boiling water should be used.) If hot water is not available, a suitable chemical disinfectant should be used as specified on the label,
    e. Air dried?
63. Are the food service utensils kept clean?
64. Are the food preparation and service areas kept clean?
65. Is the dining area kept clean?
66. Does the camp have a written plan to maintain facilities in a safe, clean and sanitary condition?
67. Does the camp program administrator have a written

accident prevention plan regarding risks to humans from both natural and man-made site hazards that is implemented through all of the following:

a. Identification of risks,
b. Reduction of such risks through camper and staff education,
c. Establishment and enforcement of regulations?

68. Does the camp have a written policy covering camper and staff possession and use of special personal equipment, such as sports and hunting equipment, vehicles, appliances, musical instruments, aquatic equipment, and possession of pets?
69. Are gasoline, kerosene, explosives and flammable materials stored in a covered safe container plainly labeled as to contents?
70. Are gasoline, kerosene, explosives and flammable materials handled only by persons trained and/or experienced in their safe use?
*71. Are all firearms and ammunitions in camp stored under lock?
*72. Are hand tools and power tools provided with necessary safety devices used according to manufacturer's instructions and maintained in good repair?
*73. Are hand and power tools used only by those persons trained and experienced in their safe use?
*74. Is emergency transportation available at all times?
75. Is there written evidence that the camp's motorized transportation vehicles are serviced regularly and maintained in safe operating condition, including check of head, tail and running lights; exhaust system, emergency warning system, windshield wipers, braking system, and steering assemblage?
76. Is every vehicle that is used for transporting staff or campers equipped with the following:
    a. Recently stocked first aid kit, and
    b. Emergency accessories, such as tools, fire extinguishers and flares/reflectors?
77. Does the camp have written safety procedures for all vehicles used for transportation of campers and staff, including:
    a. Safety education,
    b. Safe seating,
    c. Highway stops,
    d. Relief drivers when pertinent, and
    e. Supervision?
78. Does the camp forbid the transportation of campers on open bed trucks?

PART I-C
PERSONNEL STANDARDS

79. Is the camp director at least 25 years old?
80. Does the camp director hold a bachelor's degree?
81. Has the camp director completed a workshop, institute, seminar, or course related to camping and/or environmental education within the last 3 years?
82. Has the camp director attended annually at least two meetings of ACA on a District, Section, Regional or National level?
83. Has the camp director had at least 16 weeks of administrative and/or supervisory experience in an organized camp?
84. Are at least 80% of the counselors and program staff 18 years of age or older?
85. Do at least 20% of the camp program and administrative staff hold a bachelor's degree?
86. Are all junior counselors, counselors, and program staff who are under 18 years of age at least 2 years older than the camper group with which they are working?
87. Does the camp adhere at least to the following ratios of counselors to campers according to the age groups served?

Age Served	Counselor		Campers
6 years and under	1	to	5
7-8 years	1	to	6
9-14 years	1	to	8
15-18 years	1	to	10
19 and over	1	to	20

88. Are personal interviews (face-to-face or via telephone by camp director or designated representative) held with all camp staff prior to employment?
89. Does each staff member, including the director, have an accumulative total of 24 hours or more each 2 weeks in blocks of not less than 12 consecutive hours free from camp responsibility?
90. Does each staff member have at least 2 hours daily free from assigned camp responsibilities?
91. Does the camp have a separate facility for staff privacy and freedom from campers?
92. Does the camp have a written policy prohibiting gratuities to personnel?
93. Does the camp management provide staff an opportunity to participate in the establishment of camp objectives, program, policies, and regulations, including those that affect themselves?
94. Does the camp have a planned orientation for staff prior to the camp pre-camp training, including at least 3 of the following:
    a. Camp staff manual,
    b. Reading list with resources available,
    c. Packet of pertinent ACA or other publications,
    d. Attendance at a workshop or training course,
    e. Correspondence or personal interviews including more than personnel policies, job descriptions and terms of employment agreement,
    f. Visit to the camp site,
    g. In-school planning sessions (outdoor education)?

95. Does the camp conduct a pre-camp staff training program of the designated length for all staff?
    a. Resident camp - at least 5 days in length on the campsite
        (1) Short term personnel - at least 3 days with one day on site
        (2) Outdoor education (school) - at least 3 days with one day on site
    b. Day camp - at least 24 hours in length, 6 of which should be on campsite,
    c. Travel camp - at least 2 days in length in a living situation
    d. Family camp - at least one day in length on site.
96. Does the pre-camp training program include the following elements: opportunity for staff to—
    a. Get acquainted with each other and develop a working relationship,
    b. Become familiar with the program resources of the site and facilities,
    c. Understand the camp objectives and how to implement them through programs, and
    d. Learn the operational procedures?
97. Does the camp implement an in-service training program during the camp season which includes at least 3 of the following:
    a. Regularly scheduled supervisory conferences,
    b. Library, including audio-visual materials, books, pamphlets, magazines, etc.
    c. Guided readings,
    d. Special program activities and skill training sessions, and
    e. Staff meetings or special training sessions relating to human behavior and group dynamics?

PART I-D
PROGRAM STANDARDS

98. Does the camp provide different types of opportunities to give breadth in 3 or more program areas?
99. Does the camp provide opportunities for campers of varied levels of skill, knowledge and experience to progress in 3 or more specific activities?
100. Is camper involvement in program planning implemented by three or more of the following procedures:
    a. Camper councils,
    b. Living unit/group,
    c. Off-season evaluation group,
    d. Off-season camper planning,
    e. Opportunity provided for self-initiated activities,
    f. Special camp committees,
    g. Program group?
101. Does the camp leadership encourage self-initiated activities by both campers and staff?
102. Does the camp provide opportunities for flexibility through modifying scheduling and by encouraging spontaneous activities?
103. Is program structured so that campers may choose daily some of the activities in which they participate?
104. In the program planning process, are limits set and made known to the camper for his protection as well as guidance?
105. Are opportunities provided for campers to assume responsibility for group living tasks?
106. Are campers and staff involved in situations encouraging understanding and appreciation of individual differences and group cooperation?
107. Are group living units composed of campers and adults of diverse backgrounds, such as geographic, ethnic, racial, social, or religious?
108. Does the camp provide program opportunities for the development of an understanding of, an appreciation for, and a responsibility toward the natural environment in 3 or more of the following:
    a. Ecology,
    b. Quality of environment,
    c. Open space,
    d. Uses of natural resource, and
    e. Action in environmental projects?
109. Does the camp program provide 3 or more activities that intellectually challenge each age level of enrolled campers?
110. Does the camp program include opportunities for campers to develop socially in at least 3 ways, such as:
    a. Develop conversational skills,
    b. Show consideration for others,
    c. Learn how to make new friends,
    d. Feel comfortable relating to other campers and staff?
111. Does the camp program provide opportunities for campers to practice their religious customs and to be free to discuss spiritual matters?

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112. Does the camp program provide activities that permit campers to extend themselves in a physical and adventuresome manner?

113. Does the camp have a written outline describing how specific objectives for camper development are implemented?

PART II-A
BASIC STANDARDS
FOR SPECIFIC PROGRAMS

114. Has the camp written operating procedures and regulations regarding the activity?

115. Does the leader in charge of the specialized activity possess competence in:
   a. Understanding the limitations of campers of varying ages and abilities with regard to this activity; recognition of readiness to participate in the planned activity,
   b. Skills specific to the activity,
   c. Assisting individuals in learning the activity,
   d. Familiarity with natural environment hazards, and,
   e. Use and care of specialized equipment?

116. Does the camp utilize equipment that is:
   a. Appropriate to age, size and ability of the user,
   b. Maintained in good repair,
   c. Stored in such a manner as to safeguard the effectiveness of the equipment,
   d. Given a safety check immediately prior to use, and
   e. Is in conformity with legal regulations, where applicable?

117. Has the camp safety procedures specific to the activity, including:
   a. Written safety regulations which are made known to campers,
   b. A ratio of adult leadership to participating campers in relation to the degree of risk involved, and
   c. First aid supplies and equipment prepared by the appropriate person to meet the potential emergencies related to the particular activity?

PART II-B
STANDARDS FOR SELECTED PROGRAMS

This symbol (*) indicates Prerequisite for membership

Waterfront Programs

*118. Is the waterfront program at all times under the immediate supervision of a person holding a current Red Cross water safety instructor certificate, a YMCA aquatic leader examiner, or a Boy Scouts of America national aquatic instructor certificate?

*119. On the waterfront staff are there, in addition to the aquatic supervisor, a minimum of one currently certified senior Red Cross life saver, YMCA senior lifesaver, or Boy Scout lifeguard who is on duty for each 25 persons in the water and an overall ratio of one guard for every 10 persons in the water?

Trip Camping or Tripping

120. Is there a minimum of 2 staff accompanying any trip camping group?

121. Is the trip leader at least 21 years of age?

122. Is protective shelter provided for the campers and staff against natural elements, such as rain, snow, wind, sun, cold, and insects as appropriate to geographic location and season?

123. Does each camper and staff have protective clothing against natural elements, such as rain, snow, wind, sun, cold, and insects as appropriate to geographic location and season?

124. Do tents or other types of temporary shelters provide sleeping space of not less than 15 square feet per person?

125. Is each camper and staff member equipped with sleeping equipment that will afford reasonable insulation from cold and dampness?

126. Is the physical condition of campers and staff screened by the camp health staff within 2 hours of departure for the trip and upon return from the trip?

127. Is there a written procedure to maintain health and sanitary conditions for trips including:
   a. Liquid and solid waste disposal,
   b. Garbage disposal,
   c. Dishwashing procedures,
   d. Purification of water, and
   e. Food preparation and storage?

128. Are the exact locations of access to medical assistance identified on the trip map?

129. Is all aquatic activity supervised by a currently certified Red Cross or YMCA senior life saver or Scout lifeguard who is not participating in the activity?

130. On the waterfront staff, are there in addition to the aquatic supervisor, a minimum of one currently certified senior Red Cross lifesaver, YMCA senior lifesaver, or Boy Scout lifeguard, who is on duty for each 25 persons in the water and an overall ratio of one guard for every 10 persons in the water?

131. If regular toilets are not available at the campsite, is a pit latrine located at least 100 feet from any lake, stream, or water supply?

132. Is permission secured for traveling on properties, using sites, and building fires?

133. Is the itinerary filed with the proper authorities?

Day Camps (These Standards are in addition to Part I Standards)

134. Do campers travel one hour or less per one-way trip?

135. Is provision made for the safe storage of camp supplies and equipment when camp is in session?

136. Is shelter for all in camp provided during inclement weather?

137. Is there a written procedure regarding camper absentees?

Travel Camping

138. Are all drivers at least 21 years of age and have a current operator's license?

139. Is the travel camping leader at least 21 years of age?

140. Do living arrangements for all staff permit a reasonable degree of freedom and privacy from campers?

141. Do campers have an opportunity to participate in food planning and the preparation of meals?

142. Are sleeping groups limited to no more than four campers?

143. Does the travel schedule allow for daily periodic rest stops, relaxation, exercise, and personal time?

144. Does the schedule not exceed 4 consecutive days without at least one full intervening non-traveling day?

145. Is safe storage provided for all supplies and equipment while in transit as well as at the campsite?

146. Is a scheduled progress and condition report system maintained between the travel group and the home base?

147. Does the travel group have in its possession a trip log which details each day's operation including:
   a. Driving time,
   b. Mileage covered,
   c. Occurrences of the day,
   d. Maintenance record,
   e. Fuel record, and
   f. Trip expenses?

148. Does the travel group have in its possession documents which fully identify the group, its leadership, ownership of equipment, purpose, insurance coverage and home base?

149. Does the director have a statement from the parents or guardians of each minor giving "limited power of attorney?"

150. Does the director have a list of the exact locations of selected local medical assistance along the intended travel route?

151. Is there a written policy for the care of any person who for any reason must be excluded from the travel program for a period of time?

152. Is provision made for doing the laundry on a regular basis?

153. Is there a minimum of one relief driver for each 2 vehicles?

154. Does the use of trailers comply with the regulations of the various jurisdictions in which travel occurs?

155. Are warm water facilities available for camper and staff use at least once each week?

Horseback Riding (These Standards are in addition to Standards 114-117)

156. Is the riding area away from distracting sights and sounds?

157. Are the stable, corrals, paddocks, and instructional rings:
   a. Away from living area,
   b. Free from accumulation of manure,
   c. Cleaned daily, and
   d. Posted "off limits" unless supervised?

158. Is the physical well-being of the horses maintained as evidenced by:
   a. Feet not cracked or chipped excessively,
   b. Open cuts or sores show signs of medication,
   c. No use of horses with sores on back or stomach,
   d. Fly spray being used, and
   e. No caked mud or dirt on horses used for riding?

159. Is protection from the elements, such as wind, sun, and rain, available for horses?

160. Is the maximum work day for a horse no longer than 6 hours in the instruction ring or 8 hours on the trail?

161. Is a written feeding schedule maintained which indicates times and approximate amounts of feeding (grain and salt as well as hay) and watering?

162. Is horseback riding specifically covered by your insurance?

Family Camping

163. When families are resident on the campsite, are the following provisions made for family living:
   a. Sleeping units provide privacy and comfort for both parents and children,
   b. Refrigeration and cooking units for infants food are available from central food service or within family units,
   c. Laundry services or equipment are available on site or nearby laundromat, and
   d. A special play area for small children is provided?

American Camping Association
OBJECTIVES AND GOALS

Through camping, to further the welfare of children and adults.

To extend the recreational and educational benefits of out-of-doors living.

To give emphasis in camping to citizenship training in keeping with the principles and traditions of American democracy.

To provide opportunities for developing awareness and appreciation of the interdependence of all living and non-living resources and a sense of responsibility for them.

To give emphasis to spiritual opportunities through camping.

To provide opportunities for fellowship among camp leaders.

To stimulate high professional standards of camp leadership.

To provide for exchange of experiences and successful practices, and for development of materials, standards and other aids for the progress of camping.

To interpret camping to related groups and to the public.

CAMP MEMBER INSIGNIA

The ACA accredited camp insignia pictured on the front of this folder may only be used by camps that are currently in good standing as an ACA accredited camp, thereby known to comply with the ACA camping Standards.

The approved site insignia may be used by a camp where the Section board has approved the site only. An accredited camp may also use this insignia since all site Standards are included in the complete ACA Standards Accreditation Program.

Both insignias are available in a number of forms, such as off-set proofs for printing, decals, and stickers. The appropriate camp insignia indicating ACA accreditation or site approval in an all metal roadsign may be rented from the American Camping Association. These signs may be displayed by the camp only when the camp is in full compliance with all applicable portions of the Standards program.

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OBSERVATIONS ON CURRENT SENATE YOUTH CAMP SAFETY BILLS

The provisions of both bills appear to strengthen organized camping and if enacted would actually contribute significantly to a safer milieu in the camping movement. Although the basic intent of the bills are designed to develop effective minimum safety standards for all camps, there seems to be key variations in each bill that need further classification. The clarification and correction of these variations would produce effective legislation that would enhance the total well-being of all campers.

Neither bill covers longevity or term of the law's life. It could be "forever" or could need periodic renewal for funding in future federal budgets and raises the questions of what happens to state implementation if funds are cut or eliminated.

Senate Bill 1830 is a basic statement of principles, mild in demands. Senate Bill 3639 is more specific and provides for enforcement and includes coverages absent in S.1830. Both bills have loopholes and ambiquities which detract from the basic intent of the bill of developing minimal camp safety standards. The standards in each bill are to be state administrated. Federal funding from 50% (House) to 80% (Senate) serves as an incentive to states to participate.

COMMENTS ON THE SENATE BILL 1830 - Senator Ribicoff

1. This bill calls for minimal camp safety standards without providing enforcement powers. State implementation is called for but not mandated. Only states meeting federal guidelines would receive federal funding.

2. State jurisdiction is called for but no penalties are set for non-compliance nor is there a time limit set for federal adoptions.

3. There are no inspections, penalties, grievance procedures, methods for appeal or protest between camps and the state.

4. The definition of "camp" omits coverage for youth tours, travel programs, so-called clinics and similar schools in recreational programs. Only resident and day camps are mentioned.

5. There are no specifics for the federal minimum standards referred to and no provisions to protect the public from misunderstanding the government approval as sanction for only minimal standards as compared to ACA's higher levels.

6. A Federal Advisory Council of 18 members calls for some details as to membership, composition and authority. Similar recognition should be accorded "state's board." Further clarification is needed.

7. The bill omits compliance time between state and federal agencies and between the states and camps therein.

8. Concern for exemption or variances for good cause are omitted.

9. The bill encourages public advertisement of governmental approval which offers unwarranted reliance by parents when the camp has only met minimal camp standards. Thus, it creates a false sense of security which is neither intended or desired. Such promotion also negates efforts for reaching to higher camping standards as exemplified by ACA. They should be clearly promoted as minimum standards.

10. The bill specifically refrains and prohibits the implementing agency from establishing or curtailing any camp's curriculum, program or ministry. This applies to both bills.

COMMENTS ON SENATE BILL 3639 - Senator Mondale

1. This bill states similar principles and concepts to S.1830 but is more specific. It calls for federal implementation and jurisdiction in the absence of state implementation or in the event of non-approval or lack of state action.

2. Penalties and punishments affecting camps are recommended and are severe for flagrant violators. There are reasonable time limits for compliance but no administrative recourse or special appeal procedures other than lengthy and costly court hearings.

3. Federal minimum standards are not specified but will be determined by the Secretary of HEW and state officials. A National Camping Advisory Council of nine members (compared to S.1830's 18) is recommended and the same for the state's advisory boards. Eighteen members would be more logical.

4. The bill calls for detailed annual state inspection of every camp and a report of every camp's health and accident log for evaluation and possible action.

5. Coverage by other federal regulations affecting camping is included, specifically OSHA which deals with employees, not campers. OSHA is already a law and can stand on its own. It does not need re-enforcement by this bill.

6. This bill also encourages promotion of a governmental approval for minimum standards with the same undesired side effects listed in S.1830.

7. There is a broad exemption clause which could create a "Favorite Class" of camps such as those operated by state governmental sub-divisions. This could mislead the public and nulify the bill's basic intent by sanctioning sub-standard camping operations under the government's jurisdiction.

8. Training to develop knowledgeable camp inspectors is mentioned, but without reference to actual training details. Professional practictioner's input, supervision, methodology and recognition of existing techniques is essential to such training.

9. Loopholes in language and definitions raises questions with the camping practictioner. One basic omission is a good definition of "camp" to provide proper coverage. ACA's guidance can help to effectively plug such loopholes.

Senator MONDALE. Ms. Fisher.

Ms. FISHER. I am Elsie Fisher, director of camping, Camp Fire Girls.

It is my real privilege to present to you the Camp Fire Girls statement in support of the Youth Camp Safety Act.

We have sent to you booklets which contain our position statement, our statement of camping philosophy, and our Camp Fire Girls "Standards for Day, Group and Resident Camping."

I would like to at this point to point out a few of the highlights of the statement and of the philosophy and standards.

Camp Fire Girls, consistent with its 63 years of conscientious concern and action on behalf of youth, supports the intent of the Federal Youth Camp Safety Act.

Camp Fire Girls, Inc., consistent with its position of active involvement in the professional camping community, supports the position of the American Camping Association on the Youth Camp Safety Act, and the ACA recommendations for implementation of this act.

We emphasize that the resources of the professional camping community should be used, both at Federal and State levels, in establishing minimum standards. We also emphasize that such implementation should be funded from the public treasury, Federal or State, or both.

We cannot stay in business with regulations and accompanying fees that we are now required to meet in some States.

In other words, in an outdoor setting it is really difficult to meet some of the State fire laws, et cetera. We do need those laws. We think they are vital, but we are concerned that an additional fee might be imposed upon camping people that they really cannot live with, particularly the smaller camps in the rural areas, in inner city areas, and other places where children have very few opportunities for an educational outdoor experience.

We have some 400 day camps, and 200 resident camps operated by chartered councils of Camp Fire Girls, Inc., encompassing 25,000 communities throughout the United States. Nearly a quarter-million girls camped in 1973.

Camp Fire Girls, Inc., in providing a charter for local units, provides that charter and right to operate with the understanding that all camps and camping programs will be operated consistent with "Day Resident, and Group Camping Standards" of the Camp Fire Girls, Inc.

These standards specifically address themselves to the welfare of campers in areas of administration, personnel, program, sanitation, health, safety, facilities, sites, and equipment.

Through its professional training for camp directors and in workshops for boards of directors and camping committees, the Camp Fire Girls standards are reinforced and interpreted.

I might add here that during the past year we have had more than 400 adults involved in training courses for camp administrators.

We think interpretation of standards to camp administrators and their interpretation and training of their own staff who will be working in day and resident camps across the country is really the key to the successful and safe operation of camping programs.

In each and every instance of camping and outdoor activity, safety standards are an integral part of the training and education of the adults and girls involved in the programs.

Because the philosophy of Camp Fire Girls camping is child-centered rather than activity centered, we believe that our organization evidences in its safety practices a regard for the well-being of children unparalleled in the field.

We are not only concerned with health, safety and sanitation, but with the atmosphere of living that evidences concern for people. In such an environment, safety of a physical kind is inherent.

I would like to point out to you in "Camp Fire Philosophy of Camping," how we encourage people to implement the philosophy I have just been talking about. I think that is where the people who are having difficulty meeting standards, who do not meet the standards, or perhaps who want to operate safe camps, but do not really do so, have difficulty. No one has trained them in how to implement a philosophy. They know what the basic standards are, and they may have the right philosophy, but they do not know the details of how to put that into action.

This is what we think we have expertise in doing.

We have in our philosophy pointed out how we implement this philosophy. The first part of that says:

> If you believe that people are more important than things, employ only sensitive, compassionate, intelligent staff who can listen to the girls and relate to them, the primary skill being in human relations.
>
> Spend more of the camp budget on qualified camp staff, and less on equipment and supplies. No camping experience is any better than the staff who provide it.

This is, we believe, where many people have difficulty in camping operations. They advertise riding programs, mountain trips, et cetera. They spend a great deal of money for that kind of equipment, and do not spend the same amount of time and effort in recruiting and training the people who then will be out working with the kids who implement this kind of program.

Our concern is for reasonable legislation which reflects the nature and conditions which make the camping experience extraordinary—legislation which is developed by and implemented by lawmakers and their colleagues who have an understanding of the very nature of the outdoor experience.

Camp Fire Girls, Inc., offers its resources in the continuing effort to develop and implement effective Federal youth camp safety regulation.

Thank you.

Senator MONDALE. Thank you.

[The information referred to follows:]



CAMP FIRE GIRLS, INC./1740 BROADWAY/NEW YORK, NEW YORK 10019/Telephone: 212 — 581-0500

POSITION STATEMENT

YOUTH CAMP SAFETY ACT

Camp Fire Girls, Inc., consistent with its 63 years of conscious concern and action on behalf of youth, supports the intent of the Federal Youth Camp Safety Act.

Camp Fire Girls, Inc., consistent with its position of active involvement in the professional camping community, supports the position of the American Camping Association on the Youth Camp Safety Act and the ACA recommendations for implementation of this Act (see attached). We emphasize that the resources of the professional camping community should be used, both at Federal and State levels, in establishing minimum youth camp safety standards and in implementation of such standards. We also emphasize that such implementation should be funded from the public treasury, Federal or State or both.

CAMP FIRE AND CAMPERS' SAFETY

Camp Fire Girls, Inc., was founded in 1910 in the camping setting. The founder, Dr. Luther Halsey Gulick, believed that the camping experience was an extraordinary opportunity to influence the lives of girls for the future.

That position and conviction is reflected today in the nearly 400 day camps and 200 resident camps operated by chartered councils of Camp Fire Girls, Inc., encompassing 25,000 communities throughout the United States. Nearly a quarter million girls camped in 1973.

Camp Fire Girls, Inc., in providing a charter for local units, provides that charter and right to operate with the understanding that all camps and camping programs will be operated consistent with Day, Resident and Group Camping Standards of Camp Fire Girls, Inc., (see attached). These standards specifically address themselves to the welfare of campers in areas of Administration, Personnel, Program, Sanitation, Health, Safety, Sites, Facilities and Equipment.

Through its professional training for camp directors and in workshops for boards of directors and camping committees, the Camp Fire Girls standards are reinforced and interpreted.

Local boards and staff are responsible for the implementation of those standards in their camps. In each and every instance of camping and outdoor activity, safety standards are an integral part of the training and education of the adults and girls involved in the programs.

Because the philosophy of Camp Fire Girls camping is child-centered rather than activity-centered, we believe that our organization evidences in its safety practices a regard for the well-being of children unparalleled in the field. We are not only concerned with health, safety and sanitation, but with the atmosphere of living that evidences concern for people. In such an environment, safety of a physical kind is inherent.

CAMPING AND LEGISLATION

Our support for youth camp safety legislation reflects our concern for all children in all camps of whatever persuasion and leadership.

But our concern is for reasonable legislation which reflects the nature and conditions which make the camping experience extraordinary — legislation which is developed by and implemented by lawmakers and their colleagues who have an understanding of the very nature of the outdoor experience.

If camping is to become legislated in such a way that it is no longer camping, then such legislation is not in the best interest of children and youth. Camp Fire Girls believes that camping can be legislated in such a way as to protect those youth participating while at the same time encouraging the type of educational outdoor experience as identified in Camp Fire Philosophy of Camping (see attached).

Camp Fire Girls, Inc., offers its resources in the continuing effort to develop and implement effective Federal Youth Camp Safety legislation.

CAMPING ADMINISTRATION
7/74

AMERICAN CAMPING ASSOCIATION

POSITION STATEMENT

SUMMARY RECOMMENDATIONS

The American Camping Association will continue to pursue its historical goal of stimulating and providing quality camping for all citizens and families by supporting the development and passage of constructive Federal legislation that will afford a consistent pattern of minimum health and safety standards throughout the United States to protect the well-being of all persons participating in organized camping.

The American Camping Association recognizes and commends the parallel intent, concern, and objectives of Senator Abraham Ribicoff (Conn.) and Representative Dominick Daniels (N.J.) in seeking sound federal legislation through their Youth Camp Safety Act bills S. 1830 and HR. 1486. ACA continues to support the basic intent of each bill. At the same time, the Association recommends further consideration by the Congressional leaders be given to combining features of both bills and to modify or change several salient elements in order to strengthen the legislation.

The American Camping Association will continue to provide the expertise, good offices, and cooperation of its officers, Board and staff as it has done since the initiation of Youth Camp Safety legislation in 1966 (S.3773), to the Congress and State Legislatures of the United States. ACA works in collaboration with, and can effect liaison with all of the major national youth-serving agencies, church denominations, and private-independent organizations involved in organized camping. The national leadership resources of these camping groups can and should be tapped by all governmental leaders in the development and implementation of minimum health and safety standards.

On January 16-17, 1974, the American Camping Association sponsored a National Consultation on Federal Youth Camp Legislation involving representatives from a cross-section of camping organizations. The Consultation reviewed the current Youth Camp Safety Act legislation. It affirmed the importance of ACA's supportive efforts to cooperate with Congressional leaders in formulating significant camp safety legislation that will protect all campers in all camps. The consultation recommended that special attention be given to the following legislative areas as prerequisites to the American Camping Association's full support to this specific federal legislation.

1. The direct utilization and continuing involvement of responsible camping leaders and practitioners in the legislative and administrative process needs to be clearly defined and provided for.

    a. The role, functions, and composition of the Federal Advisory Council as well as all State Advisory Councils should include wise involvement of camping leaders. (See pages 20, 21 and 22)

b. Advisory Councils must be involved in the developmental process for implementation, in decision-making, in setting minimum standards, in the establishment of reasonable penalties, and as ombudsman in the administration of the penalty.

c. Advisory Councils must be strongly represented by all segments of camping and by recognized authorities in the camping field.

2. Coverage in the legislation should include all components of organized camping plus recreational and educational groups, programs, or clinics which have characteristics similar to camping.

3. The Federal government will have ultimate responsibility for the law and its minimum standard provisions as well as for encouraging uniformity among the states. Implementation, however, shall be the responsibility of the states.

4. Travel camps should be governed by the laws of the state at the point of origin. Federal enforcement and administration would be impractical and difficult.

5. A time schedule for federal and state implementation along with provision for continued funding should be included in the law.

6. The training of all administrative inspector personnel should be defined, taking full advantage of the American Camping Association's Camp Visitor Training program.

7. The Standards of the American Camping Association should be utilized as a fundamental resource in the development of governmental minimum standards. ACA Standards, which are nationally recognized, will continue to set standards of excellence that will far exceed minimum standards provided by law.

8. The state Youth Camp Safety implementation should be funded from the public treasury, either federal or state or both. It is of deep concern that the states do not try to make up any possible difference between federal grants (80%) and implementation costs by charging camps licensing and inspection fees or to make up for any possible future cuts in federal budget.

9. In the past, Congress has been receptive to the idea of avoiding multiple legislative coverage of a situation or a group where an authority with obvious expertise already occupies the field.

Example: Sailors are employees—OSHA has general jurisdiction over the safety of employees, but the Coast Guard, with

far greater knowledge and experience with safety at sea has been given jurisdiction over sea-going employees. In the interest of conservation of both time and public funds, it is recommended that state Youth Camp inspectors be given similar jurisdiction exclusive of OSHA.

Finally, the American Camping Association will press forward to strengthen and extend its professional camping goals seeking to involve increasing numbers of youth and adults from all parts of our society. ACA will work for maximum understanding of the purpose and provisions of Youth Camp Safety legislation.

1. A concerned and widespread educational program for all ACA members should be initiated at once.

2. Collaboration with other national camping organizations to effect full coverage of the camping field should be continued.

3. A National ACA Task Force to develop a plan of continuing Consultation and national leadership for sound legislation should receive the highest priority by the Board and its officers. This ad hoc group should work aggressively to develop a set of minimum camp health and safety standards for use by governmental leaders.

Forthright national leadership by ACA today can significantly facilitate the concern of all responsible citizens for the well-being of all persons in organized camping in the nation and can have major impact upon the Camping Movement for the future.

American Camping Association
Bradford Woods
Martinsville, Indiana 46151

February 23, 1974

POSITION STATEMENT

We believe in the dignity and worth of each individual; we believe inherent characteristics of each individual differ and should be recognized and the good developed as fully as possible;

We believe a girl should be encouraged to have positive attitudes and an open-mindedness toward diversity and change;

We believe in providing girls with experiences to help them develop a responsible attitude towards society and to improve social conditions;

We believe as a girl grows to accept herself she is better able to accept and love others;

We believe in experiences of all kinds for girls which stimulate curiosity, result in learning, provide renewal and adventure;

We believe in the preservation, development, and wise use of human and natural resources;

We believe in strengthening and exemplifying the highest standards of a free and democratic society, ever mindful of the need for equal opportunity and justice.

Camp Fire Girls reaffirms its involvement in bringing about social change in:

1. Elimination of prejudice on basis of race, religious belief or national origin;
2. Improvement of environment;
3. Improvement of the methods used to cope with social ills;
4. Opportunity for individuals to influence decisions that affect their lives.

41-208 O - 74 - 11

I am interested in **Camp Fire**
I enjoy being with young people
I would like to volunteer by:

- ☐ *Serving as a national volunteer.*
- ☐ *Serving as a leader.*
- ☐ *Sharing my special skills.*

Name _____

Address _____

Phone _____

For council use:

(D-281)

More than ever girls need the friendly guidance of adults who, while sharing in their fun, help them derive the greatest satisfaction and good from their activities. Camp Fire is a rare setting which joins the generations and unites girls and adults in common concern and shared undertakings.

National Offices:

Corporate Headquarters at 1740 Broadway, New York, N.Y. 10019, develops materials for national and local use, trains, advises, interprets and supports those involved with Camp Fire throughout the country.

The Camp Fire Supply Division, 450 Avenue of the Americas, New York, N.Y. 10011, sells service costumes, ceremonial gowns, books and other items.

The National Service Center, 333 West Hampden Avenue, Englewood, Colorado, 80110 provides information, advice and direction in all aspects of council operation. Specialists and consultants are on call to assist councils according to their special needs.

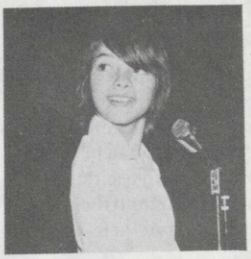


Camp Fire *is Fun.*
Camp Fire *is Being Together.*
Camp Fire *is Caring.*
Camp Fire *is a Creative Experience in Living.*
Camp Fire *is for youth and adults.*
Camp Fire *is for Blue Birds, girls six through eight.*
Camp Fire *is for Adventurers, girls nine through eleven.*
Camp Fire *is for Discovery Club members, girls twelve and thirteen.*
Camp Fire *is for girls and boys, fourteen through high school.* **Camp Fire** *is for adult volunteers who serve on local and national boards and committees and who contribute their special talents and energies because they care about youth today and tomorrow.*

Camp Fire *is for Everyone.*



Camp Fire, a nationwide youth organization, was founded in 1910 by Dr. and Mrs. Luther Halsey Gulick. They were committed to providing young people with an out-of-school experience which would enrich lives; develop life skills; offer fun and adventure and enhance youngsters' appreciation of the world around them.



Discovery members and advisers share leadership responsibilities. Members make club plans, take action and analyze and evaluate their efforts. They learn problem solving and decision making revolving around current social and personal issues.



The Blue Bird program for six-to-eight year-old girls encourages ingenuity creativity and initiative. Girls have fun, find out how to make things, learn about nature and living outdoors and make friends as they grow in ability and sensitivity to others.



Horizon Club members, girls and boys, are encouraged to explore opportunities for life after high school—home and family life, career directions and hobbies. Horizon Club members use personal skills in working with others by giving service and sharing expertise.



Camp Fire Adventurers learn to do new kinds of things, which include guided planning, setting of objectives and self-evaluation. They explore personal values through group discussion. Adventurers develop skills in the creative arts, sports, citizenship and outdoor living.

This national organization is governed by the National Council, a body of volunteers elected from across the country through zones, which sets policies and oversees the chartering and operation of local councils. The National Board of Directors, as an agent of the National Council, administers the business of the organization. The National Executive Director heads the professional staff and is responsible to the Board.

Camping has always been an integral part of the Camp Fire program. Camp is a microcosm in which all the elements of life are intensified by the total environment. It is an outdoor learning laboratory with exciting opportunities for girls to understand their relationships with each other and their environment.





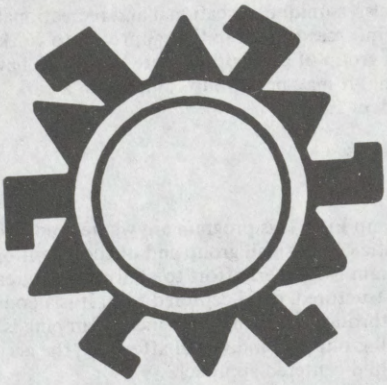
Locally, councils in over 25,000 communities in the United States and Puerto Rico administer the Camp Fire program and adapt it to the varying needs and resources of each community. There are many ways for men and women to be part of the local council operation. Whether working directly with young people or as members of boards of directors and committees, their volunteer efforts are reflected in better and more dynamic communities. Together with professional staff members they provide council leadership and support in many diverse areas.

The heart of the Camp Fire program is the 6-30 member group of young people guided by caring adults. In this setting youngsters participate in activities which enrich their lives and the lives of many others.

Group sponsors assure the continuity of a group. They help secure leaders for the group and assist leaders and members in carrying out the program.



A CAMP FIRE PHILOSOPHY OF CAMPING



Camp Fire Girls Inc.
1740 Broadway
New York, N.Y. 10019

A CAMP FIRE PHILOSOPHY OF CAMPING

We believe that:

Camping is the very normal extension in the out-of-doors of Camp Fire Girls small, group-centered program. It is also a unique educational and recreational experience for girls. The outdoor environment reinforces the Camp Fire approach to working with girls. A Camp Fire camp is any place a group of girls with mature leadership have an organized, outdoor experience in group living. It may be a group campsite in a park, a day camp on a farm, or a council-owned resident camp.

We believe that:

The basic strength of Camp Fire Girls program anywhere, and under any circumstances, is the unique characteristic of the small group and of the attention provided for each individual girl. The program is an overt effort to confront the great variety of individual differences in a loosely structured, child-centered way. It is a concerted effort to help a girl grow to womahood through her own experiences. Camping is no different. It, too, must emphasize the small group; the individual attention; the acceptance of difference; the loosely structured, child-centered approach.

We believe that:

A Camp Fire Girls camp is a microcosm in which all the elements of life are intensified by the total environment. It is a place where optimum conditions for learning to live with oneself and with others can be created. It is an outdoor learning laboratory with unique opportunities for girls to understand their relationships with their environment (A Camp Fire Girls camp focuses on the creative enrichment of the individual.) It is an oasis for children and adults; a land of fun and adventure and learning where great depth of understanding can grow from the simple experiences of living.

OBJECTIVES FOR CAMP FIRE GIRLS CAMPING SERVICES

Camp Fire Girls Camping Services have been based upon the objectives of Camp Fire Girls, Inc., a primary guide in working with children, youth and families. These camping objectives serve as the basic rationale for a camping program. These objectives apply equally to group, day and resident camping.

Appreciation of the Out-of-Doors – being aware of man's relation to the earth; conserving and using wisely natural resources; respecting the natural order of the universe; finding joy in the simplicity of nature; delight in the sensitivity to the out-of-doors.

Health, Fitness and Leisure – developing the total person to meet the rigors of modern life; being sensitive to health and safety fundamentals; being constructive and using fully one's play and work time; discovering joy, balance and renewal in life.

Physical, Mental and Emotional Health – appreciating the inter-relationship of body, mind and spirit; sharing in experiences that will help one meet developmental needs at various age levels; striving for security and acceptance; acquiring motor coordination; gaining a desire to learn and finding a temporary refuge from the pressures of daily living.

Development of Skills -- affording opportunities for personal achievement of creative skills particularly related to the outdoors; releasing individual human potential for recreation; self-expression and discovery of talents.

Ability to Work and Play with Peers – providing small group experiences to test values and beliefs under the guidance of understanding leadership; learning respect and tolerance for differences in ideas and values; seeing oneself reflected in others; recognizing the importance of fair play and justice.

Democratic Group Living – participating actively and responsibly in the give-and-take of the intimate camp living group; sharing in the daily chores and duties of community living; gaining practice in decision-making; setting group values and learning to respect persons of other races, religions, or cultures.

Concern for Others -- providing opportunities to express love and trust; appreciating the needs of those less fortunate; being sensitive to the roles and responsibilities of adults, peers and younger children; developing sensitivity toward major social programs; demonstrating selflessness and sacrifice, serving with and for others.

Development of Spiritual Values -- gaining strength from and feeling for the deep meanings and values of life; working for the greatest good for all; appreciating the religious heritage and position of different faiths; translating convictions into active concerns.

Individual Growth and Development -- seeing oneself reflected in others; learning to make decisions; building a self-concept; appreciating and understanding one's own strengths and weaknesses.

A CAMP FIRE GIRLS CAMP IMPLEMENTS THE BASIC PHILOSOPHY OF THE ORGANIZATION

The spirit of the Camping Objectives and the point of view of Camp Fire Girls about camping experiences for girls is reflected in the series of statements on the following pages.

If you believe that people are more important than things:

- employ only sensitive, compassionate and intelligent staff who can listen to girls and relate to them; the primary skill being in human relations.
- spend more of the camp budget on qualified camp staff and less on equipment and supplies; no camping experience is any better than the staff who provide it.
- develop activities that are youth-centered, not just skill-centered.
- give the staff and campers time to get to know each other by allowing them to spend maximum time together in a small, group-centered program.
- build camp buildings for girls, not for architectural awards.
- allow girls to be different, to be free to renew themselves.
- make the first commitment to children, not convenience, schedules or self-interest; a camp does not exist for these things, it is for children and, thus, it is unique if you allow them the opportunity to share in their world, its greatness, dangers, successes and failures.

If you believe that doing is as important as winning:

- provide creative, non-competitive programming where the doing of a project deserves merit, rather than deciding which one is best.
- stimulate seeing and hearing by providing night hikes, nature adventures with plants and animals, and experiences which can be had nowhere but at camp.
- allow spontaneous activities by groups to break the barriers of the clock and schedules; fun is a goal, not a byproduct.
- avoid pre-planning schedules; train adults in the skills needed to assist a group in establishing their own goals and making their own decisions.

- allow the staff to do anything with girls that is within the bounds of safety and sanity regardless of how "far-out" it might be.

- provide program opportunities by staff, letting campers plan program.

- value the simple, unsophisticated activities of camping, rather than developing elaborate, perhaps boring activities programs.

If you believe that living with others is exciting:

- create a living community where interaction is free.

- provide time for campers to live together, not just sleep in the same room.

- allow girls to talk freely without somebody policing their every word.

- allow older girls to have time alone, individually and in groups.

- provide time for discussion and debate about the real problems girls face in our society; create an atmosphere of openness.

If you believe that knowing oneself is possible:

- allow each camper free time every day.

- allow each staff member free time every day.

- allow a girl to do nothing, or a group to do nothing, or a whole camp to do nothing if that is what they want.

- provide time for personal and individual conversation.

- encourage reading, art, drama and music as normal extensions of childhood and self.

- provide an atmosphere where thinking is as important as doing, and contemplation is as significant as the backstroke.

If you believe that learning is fun:

- recognize the value of "learning by doing" and give personal commitment to this principle which allows campers to make decisions.

- provide the opportunity for campers to get out of buildings and away from nature displays.

- provide opportunities to participate in developing usable and relevant camping skills.

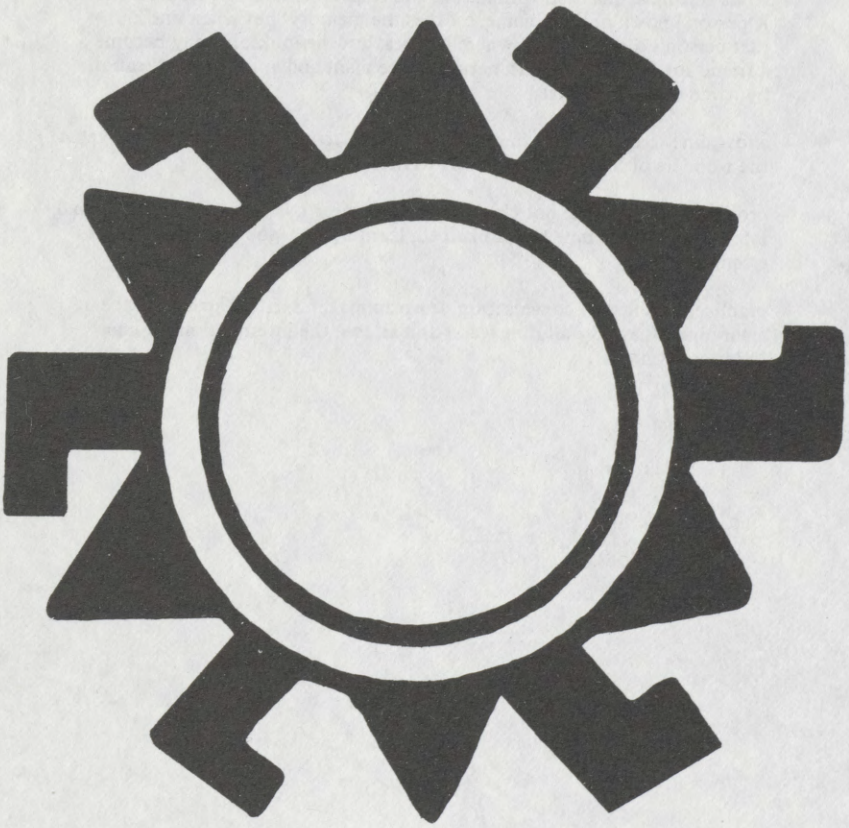
- stress getting acquainted with nature and respecting it as one would a friend. A person known only by name, escapes the memory; but when one knows that person's dislikes, likes, where he lives, how he looks, he may become a friend forever. So it is with nature. Make plant and animal identification by name only superficial.

- allow time to enjoy being in a beautiful place, to gaze at sunsets, to marvel at the wonders of life, to seek answers to the web of life.

- provide opportunities, not classes, where learning takes place out of need and interest, e.g., if a canoe trip is planned, learning to canoe properly becomes essential.

- practice sensible site conversation, leave animal and nature species in the environment, avoid polluting water and air, see the interrelations of man to his environment.

CAMP FIRE GIRLS, INC.



DAY, RESIDENT AND GROUP CAMPING STANDARDS

DAY, RESIDENT AND GROUP

CAMPING STANDARDS

Camp Fire Girls, Inc.
1740 Broadway
New York, N.Y. 10019

c 1970 by Camp Fire Girls, Inc.

Cat. No. D-85

DAY CAMPING STANDARDS

ADMINISTRATION

I. ORGANIZATION

The responsibilities connected with the administration of a council's camping program are carried by the board of directors, the camping committee, and the professional staff.

A. Board of Directors:

The board of directors is accountable to the community for the council's camping program.

B. Camping Committee:

1. The National Annual Camp Report form, with such supplementary materials as will give a complete picture of the season's operations, should be prepared by the executive director, camp director and camping committee; it should be complete and comprehensive; it should be based upon the various records of the season.

2. Definite plans for year-round care and maintenance of grounds, buildings, and equipment should be made and carried out by the camping committee. These must be related to the long-range plan for camp development, including land management and conservation of natural resources.

C. Professional Staff:

1. The executive director

She is accountable to the board for the camp, its administration, facilities and program. She should be trained in camping through attendance at Camp Fire Girls, Inc., Camping Administration Training Course.

2. The camp director

As a member of the year-round staff, the camp director is responsible for:

a) interpreting to the camping committees and to camp staff standards for camp and seeing that they are maintained

b) acting as resource to the executive director and the camping committee on the total operation of camp and working directly with the resident camping sub-committee

c) organizing and administering the camp program as an integral part of the total Camp Fire Girls program

d) recruiting, selecting, placing, training, supervising, and evaluating the performance of the camp staff

e) organizing and administering business details of camp operation

f) maintaining physical facilities and equipment by co-ordinating the work of volunteers, and supervising the camp caretaker and/or other camp maintenance employees

g) evaluating the camp program and operation, and making reports and recommendations at the close of the season.

If the camp director is a seasonal director available only for the camping season, the executive director will assume entire responsibility for some of the pre-camp and post-camp duties of the camp director. The responsibilities of a seasonal director are essentially the same as those of a full time director with appropriate exceptions.

II. BUSINESS MANAGEMENT

The board of directors and the professional staff must be guided by the policies and recommended practices of the National Council of Camp Fire Girls, Inc., on financing.

A. Financing:

1. A camp budget of estimated income and expenditures, based on actual figures of previous seasons and future plans, must be prepared by the camping committee and submitted for the season. A report of camp income and expenditures, in comparison with the budget, should be given to the board of directors at the end of the season.

2. There must be compliance with all local, state, and federal regulations applicable to camps -- Social Security, all taxes and exemption from taxes, licenses and permits.

B. Insurance:

1. Survey of camp insurance should be made periodically by a competent insurance counselor. Valuation of property should be checked annually. Adequate insurance coverage is based upon replacement value rather than depreciated valuation.

2. There should be adequate insurance to cover facilities, property and personnel as well as campers.

3. Comprehensive liability.

4. Motor vehicle:

   a) cars owned by the council and used for day camp purposes should have property damage, bodily injury liability, fire, theft, collision, passenger-carrying liability.

   b) buses or private cars used in transporting campers must have adequate insurance.

5. Workmen's compensation.

6. Medical reimbursement insurance for campers, staff, and work parties.

If day camp site is owned by council

7. Fire and extended coverage of day camp property and equipment.

8. Periodic survey of day camp insurance by a competent insurance counselor. Valuation of property should be checked once a year to insure adequate coverage.

C. The following records should be kept and filed for varying lengths of time, depending on different factors such as legal reasons, historical value, etc.

1. Registration cards for campers and written consent of parents for campers' attendance.

2. Medical records of examinations, accidents to and illness of campers, staff or others, first aid and treatments (these should be retained until possible claims, following attainment of legal age, are outlawed under the state statute of limitations).

3. All permits, inspection reports, water tests, etc., issued by local, state, or federal authorities.

4. Statistical data for permanent records and reports -- enrollment, attendance, finance, insurance.

5. A written agreement between owner of property and group using it, whether rented, leased, or borrowed.

6. A written agreement with all camp staff receiving salaries.

7. Written agreements with owners of public carriers covering transportation arrangements.

8. Inventory of supplies -- where purchased, amounts, cost, and place where any surplus is stored for winter; copy of inventory for auditor.

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9. Complete records of equipment, where and when purchased, cost, condition, where stored for winter, etc.

10. Copies of statistical, financial, and program reports sent to national headquarters and regional office.

11. Any records required by minimum wage and hour laws, Social Security, income tax, withholding tax, etc.

If day camp site is owned by council

12. Deed to day camp property -- which should be recorded with the local register of deeds -- and a map showing boundary lines of camp property.

13. Blueprints of day camp buildings and charts showing water, sewage, and electrical systems.

III. PUBLIC RELATIONS

A. A definite plan should be drawn up to provide for continuous interpretation of day camping as an integral part of the year-round program of Camp Fire Girls.

B. An attractive camp folder should be prepared and distributed to tell the story of the day camping program to girls and parents.

C. Camp should hold a membership in the proper classification in the American Camping Association. It is suggested that camping committee members hold individual memberships in the American Camping Association.

PERSONNEL

All camp staff members must meet basic qualifications which are defined as follows:

1. Maturity and emotional stability which are expressed in a sympathetic understanding of, liking for, and ability to work with people, both children and adults.

2. Personal philosophy of camping which includes appreciation of the intangible values which the camper may attain as well as the measurable gains through participation in varied activities.

I. ADMINISTRATIVE STAFF -- QUALIFICATIONS

A. Day Camp Coordinator:

1. Be at least 25 years of age.

2. Have at least six weeks of actual camp leadership experience as an adult staff member in a resident or day camp.

3. Administrative and supervisory experience.

B. Day Camp Director:

1. Be at least 25 years of age.

2. Have at least six weeks of actual camp leadership experience as an adult staff member in a resident or day camp.

3. Ability to supervise staff and a knowledge of the group process.

4. Administrative and/or supervisory experience.

5. Ability and willingness to assume final responsibility for the administration of the camp; to delegate, as necessary, responsibility for business administration, training and supervision of staff or program.

C. Assistant Day Camp Director:

1. Be at least 21 years of age.

2. Have had camp leadership experience.

3. Have ability to supervise staff and a knowledge of the group program.

D. Business Manager:

1. Training and experience in business procedures.

2. Be at least 21 years of age.

E. Nurse:

1. Be at least 21 years of age.

2. Be a registered nurse, or a licensed practical nurse, or a graduate nurse eligible for registration or a currently certified American Red Cross First Aid Instructor.

F. Unit Director:

1. Be at least 21 years of age.

2. Ability to organize unit camp living and program and to supervise unit.

G. Program Specialist:

1. Be at least 18 years of age.

2. Proficiency in her particular program area.

H. Counselor:

1. Be at least 18 years of age.

2. Have had previous camping experience or experience pertinent to camping.

I. Waterfront Staff (if program includes swimming):

1. Director:

a) current certification as American Red Cross Water Safety Instructor

b) be at least 21 years of age

c) ability to organize and supervise the total aquatic program

d) previous experience in teaching and supervising aquatic program activities.

2. Waterfront counselors must be at least 18 years old and hold current American Red Cross Water Safety Instructor or Senior Lifesaving certificates.

3. There must be one waterfront counselor to each group of ten campers in water at one time.

II. TRAINING OF STAFF

Both pre-camp and in-camp training should be provided as follows:

A. Pre-camp Training:

1. Should be a minimum of 16 hours.

2. Should include at least one day of training at day camp site.

3. Should include philosophy and purpose of camping, program activities, and leadership techniques needed in day camp programming.

4. In-camp training should include regular staff meeting, individual conferences, observation, and evaluations.

III. PERSONNEL PRACTICES

A. All staff must be selected carefully.

B. Each person should have a written job description including specific responsibilities of her position and the relationship of this position to the total day camping program.

C. There should be written agreements with any paid staff members.

D. Staff assignments with a clear delineation of responsibility, accountability, and authority as defined in the job description, should be understood and observed.

E. Medical examinations are desirable for protection of staff and the camp.

PROGRAM

I. The camping program, as an integral part of the total Camp Fire Girls program, is built upon philosophy, objectives, and program of Camp Fire Girls.

II. The camping program must be based on the knowledge, appreciation, and use of the natural facilities of the camp surroundings, and wise use and preservation of natural resources.

III. The camping program should be planned with the objective of meeting the interests, needs, and desires of each age group.

A. Length of a day camp session must be at least five days within a two-week period.

B. Number of campers in a unit should not exceed thirty-five.

C. Groups within the units should be small -- eight to ten Camp Fire Girls and not more than eight in the case of Blue Birds.

D. An adult counselor should be assigned to each group and be responsible for the girls in that group during each day.

E. A ratio of at least one counselor to eight Blue Birds and one to eight-ten other campers must be maintained. (Ratio is exclusive of director, nurse, program specialists, and Horizon Club Aides.)

IV. The program should provide opportunity for participation on individual, group, and all-camp levels since a camping experience should not be an isolated but an integral part of the child's total living experience.

A. Emphasis should be placed on the type of program which will contribute to the physical, mental, emotional, and spiritual growth and development of the individual camper, and her successful adjustment to group living.

B. The program should be flexible and give evidence of change.

C. The program should be stimulating. It should provide the challenge of new and different activities which may not be a part of year-round group programs.

V. The camping program should provide a growth experience for the camper. There should be evidence of:

A. Wholesome and constructive fun, new experiences, and adventure in outdoor living.

B. Opportunities to participate in the planning.

C. A feeling of competence in some program areas and experience in others.

D. A sense of security in belonging to a group.

E. Sufficient rest and quiet.

F. An atmosphere of unhurried, relaxed living so individual campers may participate at their own tempo and avoid physical and mental fatigue.

VI. Horizon Club girls may assist day camp counselors in program activities.

A. They should be Program Aides in Outdoor Living.

B. They should assist counselors in group activities.

C. They should be given opportunities to participate in activities of their own choice with their own age group during the day camp season.

SITE, FACILITIES, AND EQUIPMENT

I. SITE SELECTION AND DEVELOPMENT

A. Acquisition and development of new camp sites should be done in consultation with the Camping Department, Camp Fire Girls, Inc., and in accordance with camping standards of Camp Fire Girls, Inc., so the objectives and purposes of the camp program may be realized. The help of recognized state and local authorities in such areas as health, sanitation, construction, and maintenance should be sought.

B. A long-range plan for camp development, land management, repairs and maintenance, and conservation of natural resources should be drawn up and used as the basis of all planning and development.

C. Camp Fire Girls councils, unless using federal, state, or municipal property under long lease, must acquire title to camp site to protect investment in permanent improvements and to permit long-term planning.

D. A camp site should have a minimum of 1/2 acre of ground per camper. Consideration must be given to possible need for future expansion and to land development in the area.

E. All buildings and sanitary facilities should be constructed and maintained in accordance with state and local building codes.

F. Buildings should be of design and materials suited to the natural environment and climate.

G. Wells must be constructed and maintained according to state and local regulations.

H. If springs are the source of camp water supply, state or local health authorities should be consulted for the best means of protection against pollution.

I. Location of latrines must be approved by the state and/or local health authorities. Latrines, toilets, septic tanks, cesspools, waste pools, and other places of waste disposal must be located so underground water supplies, lakes, and streams are not contaminated.

J. Selection of natural swimming areas, design and construction of waterfront facilities should be done in consultation with American Red Cross or other recognized authorities and should meet their recommendations.

K. All swimming pools must be constructed so purification, circulation, and filtration meet the standards of state and local laws. In the absence of such laws, the recommendations of the American Red Cross should be followed.

L. There should be sufficient program equipment in good operating condition to carry out the stated objectives and the program activities of the camp.

M. The site must have adequate privacy.

N. The site should be accessible to the majority of the girls. No girl should travel more than one hour to reach the site.

O. There must be assurance of an uncontaminated supply of water for all purposes in amount sufficient for present needs and future expansion and development.

P. The site should have good natural drainage and be conducive to disposal of wastes.

Q. Topography should have variety and beauty and should, as far as possible, be free from poisonous plants, insects, and reptiles, dangerous cliffs, swamp and flood areas.

R. The site should provide possibilities for a wide variety of outdoor activities suitable to the Camp Fire Girls camping program.

II. FACILITIES

A. It is necessary to provide adequate shelter if the program is to be continued in event of inclement weather. If the camp is divided into units, such shelter should be provided for each unit.

B. Provision should be made for safe storage of supplies at the site.

C. There must be adequate, approved sanitary facilities easily accessible to the camping site:

1. Toilet facilities in ratio of one seat for every twenty persons.

2. Provisions for handwashing near the latrines.

D. If a public beach or pool is used, it must be an approved swimming area and must meet requirements of state laws and American Red Cross recommendations.

E. If a non-public swimming area is used, there must be careful investigation of purity of water, danger of pollution, and factors such as holes, current, undertow, condition of bottom and beach, etc.

HEALTH

I. HEALTH PROGRAM

A. A registered nurse, licensed practical nurse, graduate nurse or first aid instructor, should be a member of the camp staff and must work under standing orders of a licensed physician.

B. There must be a definite place for first aid treatment where first aid equipment is kept and nurse or first aid person can be readily located.

C. There should be understanding by camp director, nurse, and other staff, regarding reason for limiting program activities of any specific camper or staff member.

D. There should be continuous and careful attention to health factors and personal hygiene by entire staff; alertness to signs of illness or overfatigue with reports of same to nurse; understanding of relationship of the emotional aspects of a camper's life to her physical well-being.

E. There should be careful regulation of program tempo to avoid overfatigue:

1. Actual swimming period limited to thirty minutes.

2. Participation in activities limited to guard against over-exertion and fatigue, and geared to ages of campers.

3. Provision in the camp schedule for adequate rest.

F. Precautions against overexposure to sun, heat, cold, and against altitude reactions.

G. Counselors should have sufficient knowledge of first aid procedures to handle emergencies until services of the nurse can be secured.

H. Careful plans must be made in advance to handle emergencies:

1. Transportation must always be available.

2. There must be access to a telephone.

3. Arrangements for service must be made with a nearby licensed medical doctor and/or hospital.

I. Complete and careful records of health histories and all treatments given during the camp season should be kept at camp. This is important for the protection of the agency.

J. Campers should have a simple but nutritious and filling meal at noon:

1. If campers bring their own food, there should be discussion of what constitutes a good meal.

2. If meals are furnished by camp, highest standards must be observed in quality of food, nutritional values, and cleanliness in preparation.

3. In either case, adequate time should be allowed for an unhurried meal.

II. MEDICAL EXAMINATIONS

A. A permission slip signed by parent or legal guardian giving health history and attesting to camper's physical fitness for participation in day camp activities must be required.

B. A certificate of physical examination of staff is desirable for the protection of camp and the staff member.

C. If swimming or other strenuous activity is a part of the program, a certificate of physical examination by a licensed physician must be presented by each camper and staff member participating.

D. Written permission from a licensed physician to attend camp must be obtained if camper or staff has had a serious operation or illness since last health examination.

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SANITATION

I. WATER SUPPLY

A. The water supply should be adequate in volume for all purposes.

B. If not a municipal supply, the water supply should be tested regularly to show it is of safe, sanitary quality.

C. Sources of drinking water must meet public health requirements and should be conveniently located at several places in camp.

D. Water used on trips or hikes must be approved or treated with a purifying agent.

E. Any swimming pool or beach used must be maintained in accordance with state laws governing such pools or beaches.

II. FOOD SERVICE

A. Milk, cream, and other milk products must be pasteurized and provided by an accredited source, in accordance with state regulations.

B. Milk for drinking must be served from the original container (half-pint containers are the most satisfactory for day camp).

C. If food is kept at camp, food storage facilities must be dust-proof, insect-proof, and rodent-proof.

D. Refrigeration should be provided to keep milk and other perishables at 45°F. or less.

E. If campers bring their lunches from home, a cool dry place free from insects and dust should be provided for storage.

F. Dishes and utensils should be kept in a place free from dust, insects, and rodents.

G. All meats should be prepared and served under sanitary conditions.

III. DISHWASHING

A. Dishes and cooking utensils should be washed, sterilized, then air-dried.

B. If it is impossible to wash dishes according to above standards, they should be rinsed in solution of a disinfecting agent and dried with clean towels used for no other purpose.

C. If campers take their dishes home each night, dishes should be washed as above, or rinsed carefully.

IV. SANITARY FACILITIES

A. Latrines should be located, constructed, and operated according to regulations of health department which has jurisdiction over the camp area.

B. Latrines should be well ventilated and completely screened so they are fly-tight.

C. Pit-type latrines must have self-closing covers.

D. Latrines should be provided in ratio of one seat to twenty persons.

E. There should be provision for hand washing near the latrines.

V. GARBAGE AND RUBBISH DISPOSAL

A. Garbage and rubbish (including tin cans) should be disposed of promptly in containers provided for them (if in a public park), by complete incineration, burial, or removal from the camp site.

B. On hikes and trips good camp housekeeping should be observed.

SAFETY

I. PROGRAM

A. Waterfront:

1. All swimming pools and waterfront areas must be under the direct supervision of a person holding a current Water Safety instructor certificate from the American Red Cross.

2. In addition to the waterfront director, there must be at least one qualified assistant for every group of ten swimmers (currently certified American Red Cross Water Safety Instructor or Senior Life Saver at least 18 years of age).

3. All waterfront activities must be supervised at all times by waterfront staff.

4. Equipment must conform to American Red Cross recommendations.

5. Life saving equipment must be kept in perfect order at all times and be quickly and easily accessible. It should include: emergency bell, lifeboat, ring buoys, bamboo poles, surfboard, and other helpful equipment.

6. Pools must be properly fenced; approaches to aquatic areas protected by fences and entrance gates kept locked except during periods when a member of the waterfront staff is on duty.

7. Swimming area must be divided into areas for swimmers of varying abilities and clearly marked with flags, ropes, or other devices for safety.

8. Overcrowding of the swimming area must be avoided.

9. Check or buddy systems must be in force in all swimming areas with the addition of boat patrol in natural areas such as lakes or rivers.

10. Watercraft other than lifeboats must be allowed in swimming area during swimming periods.

11. Watercraft must be used only by those qualified to do so and under supervision.

12. Visitors must not be permitted to use swimming or boating facilities at any time.

B. Craft Shops:

1. Potentially hazardous tools or materials must be used only under careful supervision.

2. Tools must be kept in good condition and in a safe place.

C. Archery:

1. Archery programs should be conducted according to regulations of the Camp Archery Association of the U.S.A.

2. Ranges must be located away from paths, roads, and areas being used for other program activities, so they at no time constitute a hazard, either to participants or non-participants in the activity.

3. Archery must be conducted only under qualified supervision.

4. Equipment must be good condition and suitable for the age of the person using it.

5. Strictly enforced regulations must be in effect and posted regarding shooting, reclaiming of arrows, use of arm guards and finger tabs, storage of equipment.

D. Outdoors:

1. There must be instruction in the proper use and care of tools such as knives, axes, rakes, and careful supervision of their use.

2. Instruction must be given in the choice of sites for fires and in the building and extinguishing of them. Extreme care must be exercised in use of fires and permits secured when required.

3. At least two skilled counselors experienced in outdoor living must accompany campers on hikes and trips, and a ratio of at least one adult to eight girls must be observed.

4. Advance inspection of overnight camp sites should be made when possible in relation to water supply, shelter, swimming facilities, and provision for obtaining help in emergency.

5. A person qualified to administer first aid must be present on each trip.

6. A first aid kit must be a part of the equipment and, in areas where advisable, a snake bite kit should be included, and at least one adult must know how to use it.

7. Swimming must not be permitted unless there is sure knowledge of safe condition of water, bottom, etc.

8. Weight of packs and equipment must be carefully regulated.

9. Physical condition of campers and staff must be carefully checked before participation in long hikes or trips.

10. Staff and campers should be able to recognize the poisonous plants, reptiles, and insects in the camp area in order to avoid them in camp and on trips.

11. Staff and campers should be made aware of hazards connected with contacts with potentially rabid or stray domestic animals.

12. Camp administration must ascertain if any state or local restrictions in relation to rabid animal hazards are in force in camp areas used for trips.

II. FIRE PROTECTION

A. Regular periodic inspection of buildings, grounds, and equipment must be made by a qualified authority. Immediate correction should follow any recommendations.

B. Floors under stoves and heaters, and adjacent walls, must be protected by galvanized iron, cement, brickwork, or other approved material.

C. All heating and cooking installation must meet the approval of fire safety officials.

D. Adequate exits as required by law and outside fire escapes on buildings of more than one story must be provided and kept free from obstruction.

E. Accumulations of rubbish or brush and careless discarding of oil or paint rags constitute a fire hazard and must not be permitted. Containers for gasoline, oils, paints, etc., must be clearly labeled and properly stored in a locked, well-ventilated building at a safe distance from main camp buildings.

F. All electric wiring and light fixtures must be installed, approved, and inspected in accordance with the National Electric Underwriters Association Code.

G. Smoking must be confined to designated places and visitors should be warned of the hazards of indiscriminate smoking in camp.

H. Permits for open fires and incinerators must be secured where required.

I. Adequate fire-fighting equipment must be provided and must be regularly inspected to insure its constant readiness for use. Suitable equipment must be readily accessible in all areas of camp.

J. Procedures should be set up for fighting small fires and camp staff must be trained in the use of all fire-fighting equipment.

K. Plans must be made in advance and practices held for evacuation of camp in case of fire, flood, windstorm or other emergency. Any plan must contain provision for more than one exit from the camp.

L. Arrangements must be made for public fire protection from nearest community; staff must know where and how to summon such service.

M. All staff and campers should know and observe rules of safe conduct in electrical and other types of storms.

III. BUILDINGS AND GROUNDS

A. Environmental hazards such as cliffs, swamps, loose stones, holes, tumps, roots, dead trees, poisonous plants, insects, and reptiles should be eliminated or marked.

B. Buildings should be of sound construction and kept in good repair.

C. Grounds must be kept free of broken glass, nails, or other dangerous objects.

IV. MECHANICAL EQUIPMENT

A. Boilers, motors, stoves, bottled gas equipment, automobiles, and tractors must be inspected regularly, kept in good repair, and operated only by qualified persons.

B. Boilers and pressure tanks must be tested regularly and thoroughly.

C. All mechanical equipment should be properly prepared for periods of disuse.

V. TRANSPORTATION

A. All camp vehicles must meet all safety tests required by state and/or local regulations. They must be maintained in safe condition and good repair.

B. Vehicles must be operated only by persons properly licensed (chauffeur's license if required).

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C. Passenger-carrying liability must be carried on all vehicles transporting campers or staff.

D. Vehicles used for transportation of passengers should be fully equipped for that purpose. If trucks are used, safe seating must be provided and standing prohibited.

E. There should be adequate staff besides driver, to maintain order and proper behavior in buses and camp vehicles transporting campers.

F. Each transportation unit must carry adequate first aid equipment.

G. Vehicles must not be loaded beyond their normal capacity.

H. Buses used in transporting campers must be properly licensed, authorized to traverse routes used, and adequately insured. Only buses owned and operated by reputable firms or individuals and with responsible drivers should be used.

I. Vehicular traffic over camp roads should be strictly controlled for safety in camp. Adequate parking areas for staff and visitors should be located away from program and living areas so roads will not be blocked.

RESIDENT CAMPING STANDARDS

ADMINISTRATION

I. ORGANIZATION

The responsibilities connected with the administration of a council's camping program are carried by the board of directors, the camping committee, and the professional staff.

A. Board of Directors:

The board of directors is accountable to the community for the council's camping program.

B. Camping Committee:

1. The National Annual Camp Report form, with such supplementary materials as will give a complete picture of the season's operations, should be prepared by the executive director, camp director and camping committee; it should be complete and comprehensive; it should be based upon the various records of the season.

2. Definite plans for year-round care and maintenance of grounds, buildings, and equipment should be made and carried out by the camping committee. These must be related to the long-range plan for camp development, including land management and conservation of natural resources.

C. Professional Staff:

1. The executive director

She is accountable to the board for the camp, its administration facilities and program. She should be trained in camping through attendance at Camp Fire Girls, Inc., Camping Administration Training Course.

2. The camp director

As a member of the year-round staff, the camp director is responsible for:

a) interpreting to the camping committees and to camp staff standards for camp and seeing that they are maintained

b) acting as resource to the executive director and the camping committee on the total operation of camp and working directly with the resident camping sub-committee

c) organizing and administering the camp program as an integral part of the total Camp Fire Girls program

d) recruiting, selecting, placing, training, supervising, and evaluating the performance of the camp staff

e) organizing and administering business details of camp operation

f) maintaining physical facilities and equipment by co-ordinating the work of volunteers and supervising the camp caretaker and/or other camp maintenance employees

g) evaluating the camp program and operation and making reports and recommendations at the close of the season.

If the camp director is a seasonal director available only for the camping season, the executive director will assume entire responsibility for some of the pre-camp and post-camp duties of the camp director. The responsibilities of a seasonal director are essentially the same as those of a full time staff person with appropriate exceptions.

II. BUSINESS MANAGEMENT

A. Financing:

1. A camp budget of estimated income and expenditures, based on actual figures of previous seasons and future plans, must be prepared by the camping committee and submitted to the finance committee to be included in the total council budget for approval by the board of directors in advance of the season. A report of camp income and expenditures, in comparison with the budget, should be given to the board of directors at the end of the season.

2. There must be compliance with all local, state, and federal regulations applicable to camps -- Social Security, all taxes and exemptions from taxes, licenses and permits.

B. Insurance:

1. Survey of camp insurance should be made periodically by a competent insurance counselor. Valuation of property should be checked annually. Adequate insurance coverage is based upon replacement value rather than depreciated valuation.

2. There should be adequate insurance to cover facilities, property, and personnel, as well as campers.

C. Records (The records listed below should be kept for an appropriate period of time depending on legal protection and value.):

1. Deed to camp property which should be recorded with register of deeds and a certified survey showing boundary lines of camp property.

2. A written agreement between owner of property and group using property -- whether rented, leased, or borrowed.

3. Copies of a master site plan for development and/or improvement.

4. Blueprints of camp buildings and charts showing water, sewage, and electric systems.

5. Statistical data for permanent records and reports -- enrollment, financial, insurance, taxes, tax exemption.

6. Copies of annual camp reports sent to Camp Fire Girls, Inc.

7. Copies of reports made to local federated fund-raising agency.

8. Record of camperships, sources, and recipients.

9. Complete record of equipment, where and when purchased, cost.

10. Complete inventory of equipment, condition, where stored; if borrowed, record of date of return.

11. Medical records for campers, staff, and others. These records include medical examinations, accident and illness, reports, first aid and treatments, standing orders signed by physician.

12. Inventory of food and supplies, where purchased, amounts, cost, and where surplus is stored.

13. Record of government surplus.

14. Record of periodic inspections of all fire-fighting equipment, buildings, grounds and electric wiring.

15. All permits, licenses, inspection reports, water tests, etc., issued by local, state, or federal authorities.

16. Written agreements with all camp staff.

17. Reports on camper referrals from other agencies.

18. Any records required by minimum wage and hour laws, Social Security, income tax, withholding tax, etc.

PERSONNEL

I. ADMINISTRATIVE STAFF -- Qualifications

A. Camp Director:

1. At least 25 years of age.

2. Bachelor's degree from an accredited college or university.

3. At least 16 weeks of administrative and/or supervisory experience in a resident camp.

4. At least two years of administrative or supervisory experience in a field other than camping.

5. Knowledge of the Camp Fire Girls program.

B. Assistant Director:

1. At least 25 years of age.

2. Bachelor's degree from an accredited college or university.

3. At least 12 weeks of administrative or supervisory experience in a resident camp.

4. Administrative or supervisory experience in a field other than camping.

C. Program Director:

1. At least 21 years of age.

2. At least two years of college.

3. At least twelve weeks of actual camp leadership and program experience.

D. Business Manager:

1. At least 21 years of age.

2. Training and experience in basic business procedures.

3. Administrative and/or supervisory experience in a field other than camping.

E. Nurse:

1. At least 21 years of age.

2. Registered nurse, or licensed practical nurse, or graduate nurse eligible for registration, accredited to practice in the state in which the camp is located.

3. Training and experience in first aid.

II. PROGRAM STAFF

A. Counselors:

1. At least 19 years of age within the year of employment.

2. Two years of college or the equivalent in camping experience, such as:

a) One year of college plus eight weeks as a counselor.

Or

b) Completion of the Camp Fire Girls Counselor-in-Training Course.

Or

c) Two years as a volunteer leader under supervision.

B. Unit Directors:

1. At least 21 years of age.

2. Two years of college or the equivalent in camping experience. (see above II-A, 2.)

C. Program Specialist:

1. At least 19 years of age.

2. Two years of college or the equivalent in camping experience. (see II-A, 2.)

D. Waterfront Staff:

1. Director

a) At least 21 years of age.

b) Holder of current American Red Cross Water Safety Instructor Certificate.

c) Administrative or supervisory experience in aquatic activities.

2. Assistant Waterfront Director.
(same qualifications as above)

3. Waterfront Counselors

a) At least 18 years of age.

b) Holder of current American Red Cross Water Safety Instructor Certificate, Instructor of Beginner, Senior Lifesaving Certificates.

III. FOOD SERVICE STAFF

A. Food Service Director:

1. At least 21 years of age.

2. Holder of a current food handler's certificate.

3. Experience in planning and supervision.

4. Experience in food purchasing and menu planning.

B. Kitchen and Dining Room Staff:

1. Current food handler's certificate.

IV. ORGANIZATIONAL STANDARDS

A. At least 20% of the program staff should be 21 years old and older.

B. Camper to Counselor Ratio:

1. Six Blue Birds to one counselor.

2. Eight Camp Fire, Junior Hi or Horizon Club girls to one counselor.

C. Staff Continuity:

1. At least 25% of the staff should be returning from the previous year.

2. All staff should be hired for the total season.

V. STAFF TRAINING

A. Pre-camp Training:

1. Training shall be at least five days on the camp site.

2. A written course outline or plan for the training should be prepared.

B. In-camp Training:

1. Regularly scheduled staff meetings.

2. Individual conferences.

3. Regular staff supervision and evaluation.

C. Camping Administration Training Course:

1. Attendance at the first course offered after appointment is required of all full time professionals.

2. Attendance by seasonal directors where possible is encouraged.

VI. PERSONNEL POLICIES

A. Full time professionals should be covered by the council personnel policies for such staff.

B. Provision should be made for full time professionals who have responsibility for the direction of a camp to have supplementary time off during the camping season or a salary adjustment in lieu of time off.

C. A full time caretaker should be covered by the council personnel policies for such staff.

D. The position, qualifications and salary range for a Seasonal Director should be approved by the Board upon joint recommendation of the camping and personnel committee.

E. There should be a written agreement for each staff member specifying job title, dates of employment, remuneration and staff regulations, termination of employment, insurance, time off, and personal conduct.

F. Each staff member should have at least two hours free from responsibility each day and at least twelve consecutive hours off each week.

G. There should be a statement of procedures through which staff members may readily express themselves on matters of camp policies and regulations.

PROGRAM

I. The camp program is an integral part of the total Camp Fire Girls program, carrying out the philosophy, purpose, and program of Camp Fire Girls in an outdoor setting.

II. The camp program should be based on the knowledge, appreciation, and use of the natural facilities of the camp surroundings and wise use and preservation of natural resources.

III. The camp program should be planned with the objectives of strengthening human relationships and meeting the interests, needs, and desires of each age group (Blue Birds, Camp Fire Girls, Junior Hi Camp Fire Girls, Horizon Club) through unit organization.

A. The number of campers in a unit should be thirty-two or under and must not exceed forty.

B. Tent or cabin groups within the units should be small -- not more than eight campers and preferably not more than six Blue Birds.

C. An adult counselor should live with each cabin or tent group (with the possible exception of teen-age units).

IV. The program should provide opportunity for participation on individual, small group (cabin, unit, and interest group), and all-camp levels because the camping experience should not be an isolated but an integral part of the child's total living experience.

A. Emphasis should be placed on the type of program which will contribute to the physical, mental, emotional, and spiritual growth and development of the individual camper and her successful adjustment to group living.

B. The program should be varied and give the camper an opportunity for choice of activities with counselor guidance. The program should be stimulating and challenging.

V. The camp program should provide evidence of:

A. Wholesome and constructive fun, new experiences, and adventure in outdoor living.

B. Opportunities to initiate activities and participate in the planning in her cabin, in the unit, and through representation in the total camp.

C. A sense of security.

D. Sufficient rest and quiet for all children.

E. An atmosphere of unhurried, relaxed living and a flexible schedule to give opportunities to participate in self-initiated and spontaneous activities at a girl's own tempo.

VI. Provision should be made for meeting the religious obligations of all campers and staff.

VII. Written reports of program activities should be kept to use in compiling records and to provide guidance for another year.

SITES, FACILITIES, AND EQUIPMENT

I. SITE SELECTION

A. The location must provide adequate privacy.

B. It should be easily accessible and within reasonable distance from Camp Fire Girls council headquarters.

C. There must be assurance of uncontaminated supply of water for all purposes in amount sufficient for present needs and future development and expansion.

D. The site should be one with good natural drainage and conducive to disposal of wastes.

E. Topography should have variety and beauty and should, as far as possible, be free from unnecessary hazards such as poisonous plants, insects and reptiles, dangerous cliffs, swamp areas and flood areas.

F. The site should provide possibilities for a wide variety of outdoor activities suitable to the Camp Fire Girls camping program.

G. A camp site should have one acre of ground per camper. Consideration must be given to possible need for future expansion.

H. The camp should be laid out so that administration and service facilities are located conveniently in relation to units and with convenient access for deliveries:

1. Units for younger girls should be located near central facilities.

2. Unit locations should provide adequate space for sleeping quarters and program activities with sufficient distance between units.

3. Cabins or tents should be placed at least 50 feet apart, taking full advantage of favorable site factors.

4. Latrines should be located 75-150 feet from sleeping quarters and must have approval of health authorities.

5. All buildings and sanitary facilities must be constructed and maintained in accordance with state and local building codes.

6. Units of cabins, tents, or other shelters should provide for grouping of campers of same age, similar interests, and experience.

7. Living quarters and facilities should be planned in relation to age group which will use them.

8. There should be storage space for clothing and belongings of campers and counselors and unit equipment.

9. There should be at least 40 square feet of floor space per occupant in sleeping quarters.

10. A unit shelter should be provided for indoor activities during inclement weather.

I. There must be separate quarters to serve as a health cabin:

1. Quarters should include treatment room, isolation room, ward, room for the nurse, and bathroom. Doors should be wide enough for a stretcher.

2. There should be space for storage of supplies with a locked section for medications.

3. Health cabin should be located so as to insure privacy and quiet, and yet be readily accessible to entire camp, including kitchen, and to the main road.

4. Provision should be made for regulating temperature, for hot water, and for a small refrigerator to keep limited quantities of food and medicines requiring refrigeration.

5. Nurse should be the only person living in health cabin.

J. There must be provision for comfortable living quarters and sanitary facilities for kitchen and maintenance staff:

1. Quarters for kitchen staff should be conveniently located but separate from the kitchen and dining hall.

2. Separate quarters for maintenance staff should be somewhat isolated, but readily accessible in emergency.

3. In addition to sleeping, quarters should provide space for relaxation and for storage of clothes and other belongings.

K. There must be a building, room, or tent that affords staff members seclusion from campers and other persons and provides opportunity for relaxation.

L. The director should have comfortable and convenient living quarters, apart from other buildings, with provision for privacy.

M. There should be at least one permanent building of suitable size for the indoor program needs of the camp.

N. Craft shelters should have adequate light, plenty of air, and space for storage. They need not be of enclosed construction.

O. Provision must be made for dry, rodent-proof storage space for permanent equipment such as tents, mattresses, bedding, program equipment, and all food supplies carried over.

P. Swimming areas should be carefully planned to meet current and future needs.

Q. Sleeping Facilities:

1. Sleeping units should provide at least 40 square feet of floor space for each person. Beds should be placed so that heads of sleepers are at least six feet apart, and there are at least 30 inches between beds.

2. Sleeping units must be adequately ventilated.

3. Each person must have her individual bed.

4. Double-deck beds should not be used.

5. Sanitary mattress covers should be changed periodically for all mattresses. Mattresses should be aired before and during camp season.

SANITATION

Camping committee and staff must know and comply with local and state regulations regarding all types of sanitation.

I. WATER SUPPLY

A. The water supply must be adequate in volume for all camp purposes.

B. It must be tested regularly and a written record secured to show it is of safe, sanitary quality.

C. Water used on trips or in outpost camps must be from sources approved by state or other regulatory agency or properly treated with a purifying agent.

D. Potable water system must be independent of any non-potable water system in camp.

E. Water-heating equipment capable of meeting all camp needs must be provided.

II. FOOD SERVICE FACILITIES AND EQUIPMENT

Highest possible standards of cleanliness must be maintained at all times in the storage, preparation, and serving of food, and in personal cleanliness of food service personnel.

A. Food Storage:

1. Food storage facilities must be dust-proof, insect-proof, rodent-proof. Food should not be stored directly on the floor.

2. Milk and perishable foods must be stored under refrigeration at all times, with a temperature 45°F or below.

3. Adequate refrigeration must be provided for perishable foods on out-of-camp trips and for outpost camping.

III. DINING ROOM AND KITCHEN

A. The food preparation and service area must be separated from the dining room.

B. Kitchen and dining hall facilities should be adequate for the size of the camp; allowance should be made for future growth.

C. Provision for adequate ventilation must be made.

D. At least two outside exits must be provided for dining hall.

E. Tables in dining hall should be of size to accommodate eight to ten, including counselor.

F. Kitchen and dining hall equipment must meet sanitary standards and should be adequate for efficient storage, preparation, and serving of food for maximum capacity of camp.

G. Comfortable and pleasant dining space near kitchen should be provided for kitchen and maintenance employees.

IV. BATHING AND HAND-WASHING FACILITIES

A. A sink to be used only for hand-washing should be provided in the kitchen for the kitchen staff.

B. Lavatories, must be provided in ratio of one to eight persons in camp. If wash basins are to be used, each person must have her own.

C. Facilities for hot water showers should be provided in ratio of one shower per twenty persons. Where a swimming pool is used, showers should be convenient to the pool.

D. A central sanitary facility with hot water, showers, lavatories, toilets (and laundry facilities for staff) should be be conveniently located. Other toilets and facilities for personal cleanliness should be located from 75 to 150 feet from sleeping quarters:

1. Showers must be provided in the ratio of one shower head for twenty persons. Privacy must be provided by curtains and/or partitions.

2. Toilet facilities must be provided in the ratio of one seat for ten persons. Toilet stalls must be equipped with doors or curtains to insure privacy.

3. There should be separate sanitary facilities for counselors.

4. There should be toilet and shower facilities for men.

5. There should be shower facilities near the pool and toilet facilities near any swimming area.

6. All facilities should be well ventilated, well lighted, and screened.

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V. GARBAGE AND RUBBISH DISPOSAL

A. Garbage and rubbish cans must be fly-tight, non-absorbent, water-tight, emptied, cleaned, and disinfected daily. They should be kept on a raised screened platform which can be cleaned easily.

B. The disposal of garbage and rubbish from main camp and out-post units must conform to state and/or local regulations.

VI. SEWAGE DISPOSAL

A. Facilities for liquid waste must be located, constructed, and maintained according to regulations of health departments which have jurisdiction over the camp area.

B. Latrines of whatever type must be fly-tight. The ratio must be one seat for ten persons. Pit-type latrines should have self-closing lids.

C. Latrines, toilets, septic tanks, cesspools, and other places of waste disposal must be located so that underground water supplies, lakes, and streams are not contaminated. Location must be approved by state and/or local health authorities.

VII. HORSES

A. Quarters for horses must be located at least 1500 feet from camper living quarters, cooking or dining areas, and water supply sources.

B. Stables must be clean at all times.

C. Horses should not be permitted access to central camp or swimming area.

HEALTH

I. HEALTH PROGRAM

A. Personal cleanliness, provision for which should include hot water showers, and hand-washing facilities near latrines, dining, and sleeping quarters.

B. Careful regulation of program tempo to avoid over-fatigue:

1. Actual swimming limited to thirty minutes.

2. Participation in activities limited to guard against over-exertion and fatigue, and geared to age level of campers.

3. Precautions against overexposure to sun, heat, cold, and against altitude reactions.

C. Provision in the camp schedule for adequate rest -- at least one hour during the day for all campers and staff; a minimum of 10 hours' sleep for younger campers, 9½ hours for intermediate campers, 9 hours for older campers, and 8 hours for staff.

II. MEDICAL EXAMINATIONS

A. Campers:

1. Each camper must have a complete medical examination within six months of going to camp, by a physician licensed to practice medicine.

2. A detailed record of the complete examination must be entered on the medical examination section of the health blank by the physician.

3. Each camper, upon arrival at camp, must have a check-up by a physician licensed to practice medicine or a registered nurse, or licensed practical nurse, or a graduate nurse. The medical examination report and health history should, if possible, be in the hands of the camp director for study prior to the girl's arrival at camp. If this is not possible, the reports must be presented upon arrival at camp.

B. Staff:

1. All staff members must present a record of complete medical examination given within six months by a physician licensed to practice medicine. This should include date and result of a chest X-ray or a negative tuberculin test given within the past year.

2. At the time of signing contract, a health history signed by parent, legal guardian, or family physician must be presented. Health history may be signed by the applicant, if over 21.

3. A check-up upon entering camp.

C. Food service employees must present, in addition to B, above:

1. A food handler's permit (less than one year old) where required locally.

2. Record of negative stool within three months, according to local laws, in case of a history of typhoid or persistent diarrhea.

4. Evidence of freedom from acute colds, "flu" and skin diseases (such as boils or pustular eruptions). There should be continuous observation for such things and a check at least weekly during the season by a physician licensed to practice medicine or a registered nurse.

III. HEALTH SERVICES

A. A registered nurse, or licensed practical nurse, or a graduate nurse eligible for registration must be in residence on the camp site:

1. She must be responsible for carrying out a positive health program as a part of the total camp program.

2. She should participate in pre-camp staff training; discussions and demonstrations on total health program, counselors' responsibilities, and health and safety practices on all out-of-camp trips.

3. She must function under written standing orders from a physician licensed to practice medicine.

4. She should inspect campers on opening and closing days, and staff upon arrival.

5. She should make provision for and keep a record of daily health check of the camp, including sanitary facilities, food service facilities, and sleeping quarters.

6. She must retain in her care and administer all medications including those brought to camp by campers and staff. Such medications should be kept under lock.

7. She must maintain complete records of all treatments, on individual health forms.

B. The staff must include a substitute nurse or a person(s) holding current ARC Instructor's or Advanced First Aid certificate, to function during any absence of the camp nurse.

C. Transportation must always be available for emergency and there must be ready access to a telephone.

D. Arrangements to serve the camp must be made with a nearby physician licensed to practice medicine.

E. Clearly understood arrangements with the nearest hospital must be made in writing through the physician serving the camp concerning the admission of emergency patients.

F. Written plans must be made in advance to handle emergencies such as occurrence of a contagious disease, serious accident, or emergency operation. In case of serious accident or epidemic the Camping Department, Camp Fire Girls, Inc., should also be notified immediately.

G. Counselors must have sufficient knowledge of first aid procedure to handle emergency situations until service of nurse can be secured. Reports of all first aid given must be made promptly to the nurse.

H. Medical reimbursement insurance including illness must be carried for all campers and staff.

I. Complete and careful records of health histories and all treatments given during the camp season must be kept at camp.

IV. FOOD SERVICES

A. Meals must provide an adequate amount of good quality food and must meet nutrition and cleanliness requirements.

B. Meals prepared by campers on cookouts must meet standards of nutrition and cleanliness.

C. All meats used must be federally inspected.

D. Milk must be pasteurized and provided by an accredited source according to state regulations.

E. Milk must be served at the table from original containers not larger than two-quart size.

F. Other milk products, such as ice cream or cottage cheese, must be provided by accredited dealers.

G. If dried milk is used, it must be prepared and handled in sanitary manner.

SAFETY

Camp authorities must be thoroughly familiar with, and comply with all state laws and regulations relating to safety. Staff and campers must be safety-conscious at all times.

I. PROGRAM ACTIVITIES

A. Swimming:

1. All swimming pools and waterfront areas must be under the direct supervision of a person holding a current Water Safety Instructor's Certificate from the American Red Cross.

2. In addition to the waterfront director, there must be at least one qualified assistant (currently certified Life-saver) for every group of ten swimmers or ten participants in watercraft activities.

3. Swimming areas must be divided for swimmers of varying abilities, and clearly marked with flags, ropes, or other devices.

4. Overcrowding of the swimming area must be avoided.

5. Check and buddy systems must be in force in all swimming areas with the addition of boat patrol in natural areas such as lakes or rivers.

6. Pools must be properly fenced and entrance gates kept locked except during periods when a member of waterfront staff is on duty.

7. Visitors must not be permitted to use swimming or boating facilities at any time.

8. Lifesaving equipment must be kept in perfect order at all times and be quickly and easily accessible.

9. Surfaces of docks, diving boards and floats must be covered with nonskid paint or material and kept in a safe condition.

10. Watercraft must be kept in safe condition and must be properly equipped.

B. Boating:

1. Use of watercraft must be restricted to areas which can be kept under constant observation while in use.

2. Watercraft must not be loaded beyond capacity.

3. There must be a system of checking in and out, showing at a glance what watercraft are out and what individuals are using them.

4. All use of watercraft must be restricted to those who can swim well enough to take care of themselves in case of capsize or other emergency.

5. Non-swimmers (if wearing lifejackets) and novices may use or go in rowboats with at least one Senior Lifesaver in each boat.

6. State boat licensing regulations, where applicable, must be complied with.

C. Riding:

1. Specific areas (corrals and riding rings) and trails for riding must be properly located and identified with a view to the safety of all campers.

2. There must be a sufficient number of instructors to insure adequate supervision of all riders -- a minimum of one counselor to four riders.

3. Campers must have written permission from parents for riding.

4. Horses must be selected and assigned in relation to ability of riders.

5. Tack and other equipment must be in safe condition at all times.

6. Every protective measure must be taken to guard against accidents in stables, corrals, rings, and on trails.

7. Smoking must not be permitted in stables.

D. Hiking:

1. At least two counselors experienced in outdoor living skills must accompany campers on hikes and trips, and a ratio of at least one adult to eight girls must be observed.

2. A person qualified to administer first aid must accompany each trip and a first aid kit must be a part of the equipment and, in areas where necessary, a snake bite kit must be included.

3. If swimming is included in program, there must be American Red Cross Water Safety Instructors or Senior Lifesavers in charge, in ratio of one to ten swimmers. Use of any watercraft must be governed by safety regulations in force in camp.

4. Physical condition of campers and staff must be carefully checked by the nurse before participation in long hikes or trips. Checks by staff at frequent intervals during the trip or hike are advisable.

5. The camp director or program director must have, in writing, the proposed overnight stop(s) for an out-of-camp trip.

II. FIRE PROTECTION

A. Regular periodic inspection of buildings, grounds, and equipment must be made by a qualified authority. Immediate correction should follow any recommendations.

B. All heating and cooking installations must meet the approval of fire safety officials. Chimneys and fireplaces must be properly built and inspected annually. Stovepipes must be properly installed. Screens must be provided for fireplaces and spark screens for chimneys. Stoves must be kept free from grease.

C. Adequate exits, as required by law, and outside fire escapes on buildings of more than one story must be provided and kept free from obstruction.

D. All electric wiring and light fixtures must be installed in accordance with the National Electric Underwriters Association Code, approved and inspected at least yearly before camp.

E. Containers for gasoline, oils, paints, etc., must be clearly labeled and properly stored in a locked, well-ventilated building at a safe distance from main camp buildings. Such flammable material must be used only by authorized adults.

F. Smoking must be confined to designated places, and visitors should be warned of the hazards of indiscriminate smoking in camp.

G. Permits for open fires and incinerators must be secured where required.

H. Adequate fire-fighting equipment must be provided and must be periodically inspected to assure its constant readiness for use. Suitable equipment must be readily accessible in all areas of camp.

I. Procedures must be set up for fighting small fires, and camp staff must be trained in the use of all fire-fighting equipment.

J. Plans must be made in advance and practices held for evacuation of camp in case of fire (also for flood, windstorm, or other emergency). Any plan must contain provision for more than one exit from the camp. Such plans must be in writing.

K. Arrangements must be made for public fire protection from nearest community.

III. MECHANICAL EQUIPMENT

Boilers, motors, stoves, bottled gas equipment, automobiles and tractors must be inspected regularly, kept in good repair, and operated only by qualified persons.

IV. POISONS

Insecticides, germicides or other poisonous substances must be clearly labeled and properly stored away from food, in a place accessible only to authorized persons.

V. TRANSPORTATION

A. All camp vehicles must be maintained in safe condition and good repair. They must meet all safety tests required by state and/or local regulations.

B. Vehicles must be operated only by persons properly licensed (chauffeur's license if required).

C. Passenger-carrying liability must be carried on all vehicles transporting campers or staff.

D. Vehicles used for transportation of passengers should be fully equipped for that purpose. If trucks are used, safe seating must be provided with standing prohibited. Open or flat bed trucks should not be used.

E. There should be adequate supervision in transportation units. In a transportation unit which carries six or fewer passengers, one adult is required. Units which carry 6-15 passengers, a ratio of 1:8 in addition to the driver. Units with 16 or more passengers require a ratio of 1:15 plus the driver.

F. Each transportation unit must carry adequate first aid equipment.

G. Buses used in transporting campers must be properly licensed, authorized to traverse routes used, and adequately insured. Only buses owned and operated by reputable firms or individuals and with responsible drivers must be used.

H. Vehicular traffic over camp roads must be strictly controlled for safety in camp. Adequate parking areas for staff and visitors' use should be located away from program and living areas so roads will not be blocked.

GROUP CAMPING STANDARDS

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PROGRAM

1. Program must relate to the needs, interests and abilities of the girls.

2. The girls should share in the planning, execution and evaluation of the group camping experience.

3. The program should be so planned and carried out that the unity of the group is preserved and strengthened.

4. There should be individual attention for each girl.

5. The camping program should provide a growth experience for girls that would include:

   - wholesome and constructive fun
   - new experiences in outdoor living
   - participation in planning
   - sufficient rest and quiet
   - an unpressured atmosphere free from physical and mental fatigue
   - a progression in outdoor activities.

6. There must be variety and opportunity for adventure and new experiences.

7. Program must be related to the appreciation and enjoyment of the outdoors and to the wise-use of natural resources.

8. There should be use of the natural environment in the development of activities.

9. There must be flexible planning and free time for spontaneous activities.

10. There should be good conservation practice; including the maintenance and improvement of environmental quality by leaving sites, etc. in better condition than found.

PERSONNEL

1. The group leader, assistant leader or sponsor must accompany the group on all camping experiences. At least one adult accompanying the group, preferably the leader, must be adequately prepared through a training course in group camping to lead the group in this experience.

2. At least two adults should accompany any group except Horizon Clubs with extensive camping experience, where the council might reduce or eliminate this standard.

3. Adult participation must be in the following ratio of adults to girls:
   Blue Birds 1 - 6 Camp Fire 1 - 8 Junior Hi 1 - 8

4. A.R.N., L.P.N., Graduate Nurse, a Physician, or an adult who has completed A.R.C. First Aid Training within the past five years must accompany all groups.

5. All swimming programs must be supervised by a 21 year old American Red Cross Water Safety Instructor. Senior Life Savers must be on duty at a ratio of one for each ten swimmers.

6. All small craft activity must be directed and supervised by a Red Cross Small Craft Instructor, or a person with comparable experience and training in water safety and boat and canoe handling.

ADMINISTRATION

1. All groups must file trip plans in advance with the council.
2. All groups must file a trip report at the conclusion of trips with the council.
3. There should be sound financial planning and realistic budgeting practices in preparation for such a camping experience.
4. There should be a delegation of responsibility on the part of the adult leadership.
5. There should be girl planning and girl direction of the camping program.
6. There should be adequate insurance on persons and property.
7. There should be evaluation by both the girls and the adults.
8. There should be communication with parents and permission from the parents for girls to participate in a group camping experience.
9. There should be a plan for serious accidents or emergencies.
10. There should be records kept of accidents and illnesses, and a report made to the council.
11. Unless it is a council-owned or council-operated site, choice of site must be cleared with the Group Camping Committee.
12. Advance written permission from council and owner to use private property, including agreements as to use, care and restrictions, should be secured.

HEALTH

1. There should be plans made in advance for possible emergencies.

2. There should be an awareness of the pace of the program in order that campers are not unduly fatigued.

3. There should be nutritious food prepared under sanitary conditions and properly cooked.

4. There must be adequate rest in relation to the ages and physical needs of the girls.

5. There should be adequate sleeping area provided in order that girls might be at least six feet between head distance from each other in any enclosed building.

6. Provision should be made for adequate cover in case of inclement weather.

SANITATION

1. There must be measures taken to insure a safe water supply, both for drinking, swimming and just messing around.

2. There must be adequate sanitary facilities properly maintained to serve the number of campers and adults.

3. There must be adequate storage and refrigeration of foods.

4. There should be sanitary practices in personal matters as well as in the general appearance of camp site, food preparation and facilities.

5. There must be compliance with local regulations and with good health, conservation and environmental practices in the disposal of both solid and liquid wastes.

SAFETY

1. A.R.N., L.P.N., Physician or adult who within the past five years has completed the American Red Cross First Aid training should administer all first aid.

2. There must be a first aid kit readily accessible.

3. There should be clearly defined rules and regulations related to safety that girls understand and can implement.

4. Site should be relatively free of natural hazards.

5. There should be sufficient supervision at all times to insure safety.

6. There should be compliance with all state, local and Federal laws related to water activities.

7. There should be compliance with all state, local and Federal laws related to transportation.

8. There should be good conservation and safety practices as related to fire building and fire sites, and compliance with all state, Federal and local laws.

9. There must be a plan designed to deal with all emergencies.

10. There must be adherence to all rules of safety as they relate to any special programs such as: swimming, riding and boating, etc.

11. All equipment used must be in a safe condition.

12. The site must offer privacy and adequate protection from intrusion.

Dr. VERHOVEN. My name is Peter Verhoven. I am with the National Recreation and Park Association.

We have prepared testimony which I ask be entered in the record.

I would like to set the record straight in that the National Recreation and Park Association is not primarily a national camping association. We are the principal private nonprofit organization for the improvement for parks, recreation and leisure experiences for all people.

Our membership numbers around 18,000 and consists of both lay and professional members.

Mr. ANDREWS. We are friends, though.

Dr. VERHOVEN. Very much so. Significantly, I feel, it is rather unique sitting on this panel in that the National Recreation and Park Association participated as a principal subcontractor to the HEW study.

Our particular role in the study was threefold: to determine the contributions to youth camp safety curerntly being provided by public and private agencies; to ascertain the adequacy of State laws which now exist; and; to evaluate the enforcement of those laws and regulations.

May I say right off that our findings indicate Federal legislation is the only method of dealing with that we consider presently grossly inadequate situations, and in that respect we differ from the Center for Disease Control HEW study?

In summarizing, let me point out specifically some of our findings. In the area of "contribution by agencies to youth camp safety," we found that a vast majority of the materials available are published by the national organizations with whom I share this platform.

The material and classes provided by national and local agencies are geared specifically to the members and staff of these individual organizations.

Although the public may participate, there is a limited amount of information that is generally known by and available to the public. The Federal Government is certainly in a better position to act as a clearinghouse so that the public may be better informed.

Under "adequacy of State laws," most States simply have not shown the needed initiative in passing or enforcing youth camp safety legislation. Of those States with so-called relevant laws, only four have adequate regulations which are enforced, and in 24 States such legislation does not exist.

We feel Federal legislation is the only way to remove these inequities.

With regard to "effectiveness of current enforcement procedures," we found that enforcement is difficult at best and often impossible to achieve.

Keeping in mind that inspection agencies were frequently understaffed, once inspections take place and violations are noted, the enforcement on a local level is viewed as a long and costly process with results which do not justify the expenditures of time and funds.

Presently few States are geared up to conduct the kinds of inspection and enforcement of safety measures that are and will be needed.

It is our understanding that S. 3639 is intended to cover all youth

camps. However, the definition of "youth camp operator" (sec. 3(3)) does not make it clear that camps owned and operated by a State or local government agency are covered.

We see no reason for their exclusion. The health and safety of children attending publicly operated camps is no less important or more assured. We suggest that the definition include both public and private agencies and organizations.

In addition, there is presently a trend toward increased use of camps by special population groups including the handicapped, disadvantaged, and aging. These individuals require some special safety measures. We recommend that S. 3639 provide for the special standards which are necessary to assist and accommodate mentally and physically handicapped persons.

We also see a need for training programs in two areas. First, the legislation would direct that standards be established for camp personnel. We envision this as similar to present requirements for lifeguards. However, there is presently no institutional mechanism for training other camp personnel comparable to the Red Cross' work in water safety.

Therefore, we feel that the States should be charged with and should receive grant money for initiating such a training program.

Second, we feel that there should be standards for camp inspection personnel. As you can see in the attachment to our testimony, there are a wide range of areas that must be checked from kitchens to motor vehicles. Certainly some training and expertise will be required.

We recommend that some form of standards be set for camp inspectors, that States be given the responsibility to train the inspectors (or inspection teams) and, that the Federal Government develop a prototype training program.

In essence we again support very highly the bill that is before us today and we offer our personal involvement and assistance where you might see fit to use it.

Thank you.

Senator MONDALE. As I understand it from your testimony, your organization was the general subcontractor for the study, where you participated as a subcontractor.

Dr. VERHOVEN. The award of the HEW study was to Century Research Corp. (principal or prime contractor) in Arlington, and we were a subcontractor to Century Research Corp. that dealt with three specific things.

One was the determination of the level of contribution to youth camp safety by way of instructional materials from private and public agencies.

Second was the ascertainment of the adequacy of existing laws.

Third, to evaluate the effectiveness of those laws.

We did not participate in the so-called "national survey."

Senator MONDALE. Did you submit your findings then to the contractor?

Dr. VERHOVEN. Yes; we did.

Senator MONDALE. Is it your opinion that we do need national legislation?

Dr. VERHOVEN. Yes.

41-208 O - 74 - 15

Senator MONDALE. Something that HEW says is not needed at this point?

What was the name of the organization——

Dr. VERHOVEN. Century Research Corp.

Senator MONDALE. Are they involved in the recreation, camping field?

Dr. VERHOVEN. No, sir.

Senator MONDALE. Why were they selected?

Dr. VERHOVEN. It was an RFP and they were considered the successful bidder for the project. They are a research firm. Dr. Cook from Century staff was here and participated on the earlier panel with HEW representatives.

Senator MONDALE. Yes. We did not ask him any questions. Is he in camping? I will ask him right now.

Dr. Cook, are you in camping?

Dr. COOK. I am not in camping. The Century Research Corp. has been in a variety of behavioral kinds of research over its 22 years, when it was founded. Some of that has involved recreational type research.

We have done studies for the Bureau of Outdoor Recreation in the Federal recreation areas, in camping areas and so forth.

We are not recreation people as such. The contract was let as was said on a competitive bid. We submitted a proposal on the basis of a Government request for proposal. As I understand it, I am not privy to what went on inside the Government, but my understanding is that the award is made primarily on technical basis, with cost consideration the second consideration, while the legal requirement between ourselves and National Recreation and Park Association, one of the subcontractors—well, we consider the bid as a total response.

That is, we considered ourselves coequal in submitting the bid. Our expertise was in survey work principally and hopefully the National Recreation and Park Association being recreation and camping expertise.

Senator MONDALE. Thank you.

We did invite to testify today another organization—the Camping Association for Mutual Progress. This group was unable to send a representative but they have submitted a statement. I order that it be printed in the record following the statement of the National Recreation and Park Association.

[The information referred to follows:]

STATEMENT OF

NATIONAL RECREATION AND PARK ASSOCIATION

BEFORE THE

SUBCOMMITTEE ON CHILDREN AND YOUTH

SENATE COMMITTEE ON LABOR AND PUBLIC WELFARE

JULY 15, 1974

* * * * * * *

Mr. Chairman, we appreciate this opportunity to testify on S. 3639, the Children and Youth Camp Safety Act. We are pleased to have the opportunity to comment on this bill because of our concern with the full range of recreation and park experiences including camping. Our membership includes administrators of State and local park and recreation departments which operate camps. In addition, as you know, we were a subcontractor in the HEW study of youth camp safety authorized by Congress two years ago.

The National Recreation and Park Association is the principal private, nonprofit organization in the U.S. devoted to the improvement and expansion of parks, recreation and leisure services for all people. Policy is determined by a Board of Trustees representing lay persons responsible for public policy for parks, recreation and leisure, and professional and technical staff who directly plan and manage such facilities and services. Our membership exceeds 18,000 individuals. Those Association members professionally employed in this field are primarily from the public sector, particularly state and local governments, but with considerable representation from the private sector as well.

First we would like to comment on our role in the HEW study. Our role was defined to have three objectives: 1) To determine the contributions to youth camp safety being made by state and local, public and private agencies, 2) To ascertain the adequacy of state laws governing the various aspects of camp design and operation, and 3) To evaluate the effectiveness of current enforcement procedures.

Our findings indicated to us that Federal legislation is the only method of dealing with the present grossly inadequate situation. This recommendation differs from that made in the report of the Center for Disease Control.

Let me summarize our findings for you to show why we support Federal involvement.

* Contributions by state and local, public and private agenices --

The bulk of material available is publsihed by the national organizations. However, with a few exceptions, the educational materials and classes provided by national and local agencies are geared specifically to members and staff of the individual organizations. Although the public may participate, there is a limited amount of information that is generally known by and available to the public. The Federal government is certainly in a better position to act as a clearinghouse so that the public may be better informed.

* Adequacy of state laws --

Most states simply have not shown the needed initiative in passing or enforcing youth camp safety legislation. Our study found that of the states with relevant laws, only 4 have adequate regulations which are enforced and in 24 states such legislation was nonexistent. Federal legislation is the only way to remove these inequities.

* Effectiveness of current enforcement procedures --

We found that enforcement is difficult at best and often impossible to achieve. Keeping in mind that inspection agencies were frequently under-staffed, once inspections take place and violations are noted, the enforcement on a local level is viewed as a long and costly process with results which do not justify the expenditures of time and funds. Presently, few states are "geared up" to conduct the kinds of inspection and enforcement of safety measures that are and will be needed. In this connection we would like to make an observation. It appears that one of the problems in state enforcement is the proliferation of state agencies responsible for some facet of health or safety. This bill should help centralize

in a single agency, the responsibility for setting standards and inspecting youth camps. We would foresee this responsibility being placed in an existing state agency. Such an arrangement would potentially increase efficiency and reduce the costs which overlapping responsibilities entail.

In some ways, the issue of youth camp safety is a form of consumer protection. Many parents cannot afford to visit a camp and inspect it carefully. At the same time, it is widely known that many camp brochures are quite misleading and, somewhat understandably, try to portray themselves in the best, if not the truest, light. Voluntary programs are not the answer; the potential consequences are too crucial.

The study published by HEW finds that the percentage of children hurt in camping is low compared to the population at large. The limitations of the study make this somewhat questionable statistically, but the conclusion is itself irrelevant to consideration of this legislation. The more important question is "How many of the injuries, illnesses, and deaths could have been prevented with safety regulations, inspections and enforcement?" This question is not satisfactorily answered by the study. We believe that lives could be saved and injuries avoided if boats are provided with adequate life jackets; if a trained supervisor is at the pool or waterfront at all times to give emergency services; if staff and campers are fully acquainted with safety precautions used at rifle and archery ranges.

We believe there are distinct advantages of Federal regulations for camp safety. First, the Federal government can provide a degree of uniformity in the basic standards of safety. Second, Federal legislation will have universal applicability and has a better chance for good enforcement. Third, the Federal government is in the best position to draw on a wide range of expertise and other resources. Fourth, Congress can identify this as a priority and assist the states which already have many financial burdens.

We do have several specific comments on the proposed legislation itself.

It is our understanding that S. 3639 is intended to cover all youth camps. However, the definition of "youth camp operator" (Sec. 3(3)) does not make it clear that camps owned and operated by a state or local government agency are covered. We see no reason for their exclusion. The health and safety of children attending publicly operated camps is no less important or more assured. We suggest that the definition include both public and private agencies and organizations.

In addition, there is presently a trend toward increased use of camps by special population groups including the handicapped, disadvantaged, and aging. These individuals require some special safety measures. We recommend that S. 3639 provide for the special standards which are necessary to assist and accommodate mentally and physically handicapped persons.

We also see a need for training programs in two areas. First, the legislation would direct that standards be established for camp personnel. We envision this as similar to present requirements for lifeguards. However, there is presently no institutional mechanism for training other camp personnel comparable to the Red Cross' work in water safety. Therefore, we feel that the states should be charged with and should receive grant money for initiating such a training program. Secondly, we feel that there should be standards for camp inspection personnel. As you can see in the attachment to our testimony, there are a wide range of areas that must be checked from kitchens to motor vehicles. Certainly some training and expertise will be required. We recommend that some form of standards be set for camp inspectors that states be given the responsibility to train the inspectors (or inspection teams) and that the Federal government develop a prototype training program.

The proposed legislation does not provide any incentive for a state to take on the responsibility of developing state youth camp safety programs. We recognize the difficulty in this and would suggest that a penalty be provided in the law for states which, after a certain period of time, have not developed or enforced safety standards.

We would also like to make one other fairly minor suggestion about the Advisory Council on Youth Camp Safety. We note that the Department of the Interior is to have one representative. We think that it would also be appropriate for the Department of Agriculture to have a person on the Council because of their responsibility for camping on Forest Service lands, assisting farmers in establishing recreation related businesses, setting food, nutrition and service standards, and their broad extension service network. The Forest Service presently operates 139 group campgrounds.

In conclusion, we feel that camping provides an extremely valuable recreation outlet with many opportunities for physical and personal development. It is a unique experience which requires very specialized laws to regulate health and safety standards. We feel that this bill is the most comprehensive legislation proposed to date and the National Recreation and Park Association urges your favorable consideration for approval of S. 3639.

Thank you.

ATTACHMENT

RECOMMENDED CATEGORIES

A. Annual Inspection

B. Permits, Licensing and Registration of All Camps

C. Enforcement of Regulations (source and penalty clause)

D. Sanitation and Public Health

- . Toilet facilities (ratio and construction)
- . Sewage disposal
- . Solid waste disposal
- . Bathing and handwashing facilities
- . Insect, weed and rodent control
- . Animal regulations
- . General cleanliness of campgrounds and facilities
- . Water supply

E. Food

- . Food source
- . Food protection and food handling
- . Meal planning (trained dietition consulted)(nutritional requirements)

. Food storage and refrigeration

. Sanitation of dishes and utensils

. Milk supply (serving method secondary to supply)

. Food service employees

F. Site and Facilities

Camping is a unique social and educational experience in a natural environment. Site selection, location, and facilities design and development plans should support the objectives and program features of the camp. There are some basic considerations that must be included for all camps:

. A natural setting

. Site selection - location, participant density, social and health hazards (drainage, ground cover, sources of water, access, environmental conditions)

. Site layout and development - a site development plan

. Site management - appropriate conservation plan in line with programs needs

. Facility design, utilities and services - food services, toilets, showers, medical services, maintenance, waste disposal, liquid fuels, swimming pools, laundry, etc.

. Shelters for living and sleeping - adequate ventilation in cabins and/or tents; camper capacity and cubic air space requirements; adequate and individual sleeping areas (bed, bunk, air mattress); lighting and heating needs.

. program areas and facilities - attention to health and safety factors involved in design, equipment and management of programs requiring specific and specialized facilities (e.g., riflery, archery, aquatics--boating, swimming, canoeing, scuba, etc.--horsemanship, use of wood tools--knife, axe, saw--mountaineering, trip camping and cave exploration.

G. Personnel

Every camp should have a defined purpose -- a statement of objectives or goals which serve as a framework for the camper's experience. These goals and the methods used to achieve them may vary from camp to camp. They will influence the selection of camp staff and the competencies required.

Due to the diversity of objectives, philosophies, and goals under which camps operate it is virtually impossible to make recommendations to cover every staffing consideration. For example, camps with large enrollments have different personnel needs than those with small enrollments. Likewise, those camps offering specialized programs have different personnel needs than those offering a broad program.

However, within this wide diversity of needs and programs there are some common factors that can be considered in selecting staff in general: age of the employee, experience of employee, training of employee, references, and ratio of campers to staff (in relation to the type of camp, type and age of campers and age of supervisor).

H. Program Safety

Camp staff should be thoroughly familiar with and comply with all local and state safety laws and regulations. Safety training for safety consciousness should be an integral part of all camp programs. Qualified staff should attend to the following itmes and should identify additional concerns:

- Supervision of activities
- Incorporation of all safety education for staff and campers in all program activities, skills practice and care of equipment
- Recognition and minimization of hazards (within and near site)
- Conduct of regular drills for handling emergencies (fire, flood, wind and other disasters)
- Maintenance of an efficient communication system (within camp and with outside world)

. Posting of fire regulations and instructions for proper use of equipment handling and storage of flammable liquids, poisons, tools, etc.

. Execution of special program activities in a manner consistent with generally recognized standards (such as, but not limited to those of American Red Cross, National Rifle Association, American Archery Association, Under Water Society of America and American Water Skiing Association)

. Special consideration of precautions to be taken for out-of-camp trips (transportation, supervision, food, sanitation, medical supplies, first aid training and site).

I. Personal Health, First Aid, Medical Services for Resident Camp

. Doctor on call

. Standing orders for infirmary supplies, practices, treatment

. Arrangements with hospital for emergency care

. Qualified health supervisor on staff

. Physical examination for both campers and staff or written waiver

. Health history and statement of immunization record

. Permission for emergency medical care and hospitalization or written waiver from parents or guardians

. First aid training for staff and campers

. Camp infirmary and plan for isolation of campers

. First aid supplies at infirmary and program centers

. Medical treatment record/log

. Health/accident insurance for staff and campers

. System of health supervision when groups are in primitive units and/or out of camp

. Emergency transportation must be available

. Emergency evacuation procedures

. Procedures for handling and disbursement of medication

J. Transportation

. Vehicles and equipment (type, maintenance, operation, capacity, passenger use)

. Drivers and leadership (leadership pertains to supervision of children especially when there is a large group -- age and experience should be considered for both)

. Insurance

. Standards for venicular traffic on camp site.

The panel felt it necessary to define and make specific recommendations for day camps and travel and trip camps.

Day Camping is defined as a sustained day time experience which provides creative recreational and educational opportunities in group living in natural out-of-doors surroundings. Standards for residential camping apply for day camping where appropriate.

Travel Camping is a program which utilizes some mode of transportation to move the campers as a group from one site to another over a series of three or more consecutive days for experiences in different environments. Transportation may include, but is not limited to, a van, bus, station wagon, automobile, airplane, boat, train, horse, bicycle, feet or a combination of one or more of these modes.

Specific attention should be given to the following areas:

A. Personnel Qualifications and Standards

. Age requirement for counselors

. Counselor-to-camper ratio

. Minimum age of director

. Required training for aquatic staff

B. Sanitation and Public Health

- Toilet facilities
- Sewage disposal
- Garbage and waste disposal
- Insect, weed and rodent control
- Animal regulations
- Camp cleanliness
- Safe water supply

C. Personal Health, First Aid and Medical Service

- Medical care on call
- Physical exam required
- Health supervisor on staff
- First aid supplies
- Medical treatment record

D. Food Handling, Mass Feeding and Cleanliness

- Food protection and food handling
- Food storage and refrigeration
- Milk supply and serving method
- Meal planning
- Sanitation of dishes and utensils

E. Program Safety

- Supervision of activities
- Restriction of hazardous activities
- Aquatic facilities
- Horseback riding procedures
- Fire regulations
- Heating equipment
- Program equipment

F. Transportation

.. Condition of camp vehicles

. Age and qualifications for drivers

G. Site and Facilities

. Location and drainage of site

. Type and size of living quarters

. Sleeping accommodations

H. Travel and Trip

. Travel itinerary filed

. Medical care plan on file

. Parential designation of Director as temporary guardian

Camping Association for Mutual Progress

CAMP News Editors
MARY FRANCES JOHNSON
TEX ROBERTSON
Box 60 Burnet, Texas 78611

AMERICA'S CAMPs are
Safe–Valuable– Free–Educational

July 9, 1974

Hon. Walter F. Mondale, Chairman
Subcommittee on Children and Youth
U.S. Senate
Washington, D. C. 20510

Dear Senator Mondale:

We greatly appreciate your invitation to testify at the hearings concerning youth Camp Safety. As owners and active Directors of a youth camp, my wife and I are unable to leave our responsibilities to 496 children to attend these important and vital hearings.

There may be many people who will be testifying at the hearings of S. 3639, the "Children and Youth Camp Safety Act", and S. 1830, the "Youth Camp Safety Act." The men and women who know the situation, and are most deeply concerned with safety at youth camps, may not be testifying. The Committee must know that anyone directly concerned with camp safety, and the people who really know what is going on, are exactly where they should be in the middle of the summer - AT CAMP. To us it seems most unfair that these people are unable to present their opinions to the committee. We have asked that hearings be held in Texas and in California. We would also ask that these hearings be delayed until such a time as the camp people could be present. Who would know better what the real situation is?

Camp operators feel leaving their post while camp is in session is, in itself, a violation of youth camp safety. It is our responsibility to take care of these children, not to play politics, and to preserve the right of the States to take care of their own business. Even though camp operators are not there to testify, they and their camper's parents are vitally interested and anxious to cooperate with you and the subcommittee on Youth Camp Safety. Our C.A.M.P. President Si Ragsdale, owner-director of Camp Stewart, Hunt, Texas, has contacted other C.A.M.P. Directors who are members of his safety committee along with other camp owners and parents. He has asked me to present this letter and the following statements in behalf of camp operators and camp parents to the Committee Hearing.

We appreciate Miss Barbara Markham calling us and she was kind enough to say that all of our material would be presented to the committee even though it may arrive after Thursday, July 11th. Due to such short notice for such a large order, 50 of our C.A.M.P. Newspapers will be returned from different camps and sent to you by C.A.M.P. past President Larry Graham of Camp LaJunta to make up the required 100 as requested.

Again, I do thank you for your cordial letter and the invitation. I would be most happy to appear anytime after August 13th.

Sincerely,

Tex Robertson

Tex Robertson
C.A.M.P. News Editor

INFORMATION AND STATEMENT OF POSITION OF YOUTH CAMP OPERATORS AND PARENTS.

This organization, Camping Association for Mutual Progress, does not claim to express the opinions of all the thousands of camp directors and millions of camper's parents, but for three years we have been trying to do just that. We estimate that less than 1% of these people know about this proposed federal legislation even though it may be in the public records of Congress which we suppose is all the notice necessary to be legal. But don't you think these "grassroots" individuals should be informed and given the opportunity to respond? How can we restore confidence in our federal government when over 20 million citizens would be directly effected by S. 3639 without knowing what or why, or having an opportunity to respond? Without any paid workers or lobbists, C.A.M.P. with only volunteer help and contributions, sends out 7,000 news letters to camp directors about federal and state legislation.

Our Association is sending out 15,000 copies of this testimony plus the 100 to you for camps and some of their parents. This we know is still less than 1% of those concerned but the only other information has come from one person, Mr. Mitch Kurman, a furniture manufacturer, of Westport, Conn. Mr. Kurman, promoter of these federal bills, has waged a strong and dedicated ten year campaign criticizing youth camps. His efforts have gained him attention in nation wide publications and given camps their greatest amount of publicity ever; all bad.

CAMP OPERATORS STAND ON SAFETY

Due to such irresponsible publicity some of the public may not fully know what youth camping is all about. So, before we procede, please let us make something absolutely clear. ALL THE CAMP OPERATORS WE KNOW ARE FIRST AND FORMOST FOR YOUTH CAMP SAFETY AND VIGOROUSLY STRIVING TO IMPROVE IT. Camps have the best safety record of any place children are known to play, live and learn and proud of it. Directors know that health and safety must come first to survive and plan and organize their programs with capable, dedicated and safety minded counselors.

CAMP OPERATORS ARE FOR RULES, REQUIREMENTS AND YES, LEGISLATION. In state after state it has been the camp operators who have gone to their state Health Departments asking for regulations to be sure they are safe and can prove it.

YOUTH CAMPS HAVE NOTHING TO HIDE; no "cover up" here. We are proud of our safety record and want to make it better.

Now, if any member of this committee or any one present has proof of unsafe youth camps please name them with their exact location. There may well be some but in all fairness, the people claiming camps are unsafe should furnish proof of their convictions. That's the American way.

Mr. Chairman, the Camping Association for Mutual Progress respectfully requests all witnesses at this hearing making statements that youth camps are unsafe, furnish proof by naming such camps giving the exact address and listing the reasons. Such information should be most valuable for all of us.

C.A.M.P. RESPONSE TO S. 1830 and S. 3639

Camp operators and parents know these bills represent sincere concern for our youth and this effort is appreciated but youth camp safety is already taken care of by the states and camps themselves. This may not have been true when Mr. Kurman and Senator Ribicoff started their crusade ten years ago but the attention created and the fear of federal control has helped to cause youth camp leaders to get with their state governments and "mend the fences". This drive and pride for greater safety should continue unless federal control takes away the initiative, concern, responsibility and love that make camps go.

THE UNITED STATES DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE YOUTH CAMP SAFETY INVESTIGATION (Pursuant to Public Law 92-31) ORDERED BY CONGRESS (Presented April 29,1974) SHOULD PREVAIL.

This is the only comprehensive impartial youth camp safety survey made in 50 years and we feel the report represents as accurate a picture of the situation as two years work with $300,000.00 could provide. This Association compliments the HEW for a very difficult task well done. We feel the camps, parents and states will accept this report and follow the recommendations (including the paper work). How about you?

Mr. Chairman, The Camping Association for Mutual Progress respectfully requests the report by the Department of Health, Education and Welfare on Youth Camp Safety Pursuant to Public Law (92-318 be included as testimony at this hearing and the Department furnish the number of copies desired.

This report is our main argument or complete state legislative responsibility but in consideration for you Committee members we urge a thorough study of this report rather than us listing all the points favorable to our position.

You will please notice that we have included our latest C.A.M.P. News as testimony and wish to call your attention to our survey of state agencies as summarized on page 1 and listed the names of all 50 State Departments answering the survey. All States have rules and regulations pertaining to youth camp health and safety. To be fair and sure we urge each Senator to know if his state can handle that state's youth camp safety.

Mr. Chairman, the Camping Association for Mutual Progress again requests definite evidence that will help camp operators parents and the HEW promote better youth camp safety. C.A.M.P. respectfully request those at this hearing testifying that states are unable to control youth camp safety actually name those states for the record.

The HEW which these bills designate as the federal agency to administer youth camp safety says the federal government has no expertise in this field. This leaves the money that the federal government has to offer but you will notice that 40 state agencies turned down this free money to handle their own responsibility. Here is an American industry providing a valuable, educational opportunity for children without cost to the federal government.

We could list all the points favoring local and state control but know they are obvious to this committee.

We respect those who are pushing federal legislation because we know they want youth camp safety almost as much as camp operators and parents. These seem to be mostly people who would not have to work under either federal or state laws. They are "experts" on what should be done to the other guy.

We all know Mr. Mitch Kurman started this push for federal legislation and singlehanded has outworked all of us but he has not offered any proof of his sensational claims only bringing up the unfortunate death of his son in each news release. Camp operators are most sympathetic to Mr. and Mrs. Kurman for the loss of their son and admire Mr, Kurman for dedicating his efforts for camp safety to his son David. We present the interview with the Rochester Y.M.C.A. on Page 6 just for the record on legislation. Laws are not going to cover everything and we feel that organized youth camps are safer because they all teach and live by God's Laws.

We are unable to understand why the American Camping Association is pushing federal legislation. We hasten to remind the Committee that this is only a few of the top officers; a vote of the member camps has never been offered even though requested for 8 years. The ACA is the largest, oldest, finest and only national camping association. It is composed of mostly good camps but we estimate its membership is less than 3% of the camps covered by these federal bill. We feel the administration of the ACA is hurting due to so many members dropping out because of so much political importance rather than camping service. ACA vice - president John Howe of California says he favors following the recommendations of HEW and the organization should not spend so much of the member's money trying to get federal legislation.

We feel that there is a definite conflict of interest and maybe a violation of our laws which does not allow tax free organizations to lobby, but that is up to the Committee. We do not want to hurt the ACA as it is a fine organization with "grass roots" members helping each other to be better and safer, but at the same time, we do not want the three or four top officials to burden us with unneeded legislation just to get a badly needed government contract.

In conclusion, when considering legislation, please consider the unique industry of youth camping and the dedicated men and women working hard because they want to, and happy because they are free to do as much for children as they possibly can.

Thanks for your attention and allowing us to appear on paper so we could be at out jobs.

Presented for The Camping Association for Mutual Progress.

By: Tex Robertson, News Editor

Senator MONDALE. Thank you very much for a most useful contribution today. I hope now that we can proceed and I think most of the suggestions I have heard this morning have great merit and can be handled, and I hope we can pass a bill.

Thank you.

[Whereupon at 12 noon, the hearing was adjourned.]

1. Legislative History

THE LIBRARY OF CONGRESS
Congressional Research Service

WASHINGTON, D.C. 20540

May 9, 1974

TO: Senate Children and Youth Subcommittee

FROM: Education and Public Welfare Division

SUBJECT: Youth camp safety

In response to your request, the following is a brief history of legislative activity related to youth camp safety since the 90th Congress.

Since 1967, several bills have been introduced in each Congress to provide for some Federal role in developing and maintaining youth camp safety standards. The bills introduced generally provide for Federal leadership and grants to the States for developing and implementing State programs for youth camp safety standards or to provide for a study of the extent and enforcement of State laws and regulations governing the operation of youth camps. In the 90th Congress, two days of hearings were held on such bills before the Select Subcommittee on Education of the House Committee on Education and Labor, but no bill was reported.

In the 91st Congress, hearings were held before the Select Subcommittee on Labor of the same committee, and the full committee reported out H.R. 763 which authorized $150,000 for a study of the extent and enforcement of State laws and regulations governing the operation of youth camps. The bill failed to pass the House by a vote of 151-152.

In the 92nd Congress, the Select Labor Subcommittee again held hearings on youth camp safety bills but no bill was reported. Nevertheless, the Senate, on August 6, 1971, passed the Education Amendments of 1971 (S. 659) which included a floor amendment (The "Youth Camp Safety Act") by Mr. Ribicoff, adopted by voice vote, authorizing up to $2.5 million per year for 50 percent grants to States for developing and administering approved (by the Secretary of HEW) State programs for youth camp safety standards. The amendment authorized HEW to draw up Federal standards for youth camp safety and allow camps certified by the States as being in compliance with those minimum standards to advertise that fact. An advisory council on youth camp safety was created to advise and consult on policy matters relating to youth camp safety and finally, appropriations of $3 million were authorized for each of six successive fiscal years, beginning with FY 72.

In passing their version of the Education Amendments of 1971 (H.R. 7248) on November 4, 1971, the House voted 184-166 to adopt a floor amendment by Mr. Pickle authorizing $300,000 for an HEW study of youth camp safety which would include a discussion of (a) the extent of preventable accidents and illnesses occurring in youth camps, (b) the adequacy of State and local laws and the effectiveness of their enforcement, and (c) the need for Federal laws in this field. The results of the study were to be reported to Congress before January 1, 1973.

The Conference committee agreed to the House version (S. Rept. 92-798) but amended the provision to require HEW's report by March 1, 1973. Both Houses adopted the Conference report and S. 659 (by this time known as the Education Amendments of 1972) became Public Law 92-318 on June 23, 1972.

Thus far in the 93rd Congress, there have been several bills introduced to develop programs for youth camp safety. In general, these bills provide for the development of Federal standards for youth camp safety and grants to States to implement programs that comply with those standards. In some bills, the Secretary of HEW is authorized to conduct inspections and fines are proposed for noncompliance by camp operators. Although no legislative action has yet been taken in this Congress, the House Select Subcommittee on Labor is scheduled to hold hearings in the very near future. In a related matter, the HEW report on youth camp safety required by P.L. 92-318 was released on April 29, 1974, and its major findings and recommendations are enclosed.

If I can be of further assistance, please let me know.

Tom Wander

2. Department of Health, Education, and Welfare Report on Youth Camp Safety

THE SECRETARY OF HEALTH, EDUCATION, AND WELFARE
WASHINGTON, D. C. 20201

APR 29 1974

Honorable Gerald R. Ford
President of the Senate
Washington, D.C. 20510

Dear Mr. President:

The final report on youth camp safety, which was carried out under Title VI of the Education Amendments of 1972 (Public Law 92-318), is enclosed. This Act directed the Secretary of Health, Education, and Welfare to make whatever investigation was necessary to determine:

1. The extent of preventable accidents and illnesses currently occurring in youth camps throughout the Nation;

2. the contribution to youth camp safety now being made by State and local public agencies and private groups;

3. whether existing State and local laws adequately deal with the safety of campers in youth camps;

4. whether existing State and local laws relating to youth camp safety are being effectively enforced; and

5. the need for Federal laws in this field.

A review of existing data was done in 1972 and early 1973. This review included a literature search and inquiries to States and relevant national organizations. The information gathered indicated that no previous studies had produced data with sufficient depth and scope to answer the questions raised by Congress. Therefore, an interim report (copy enclosed) was submitted to Congress in March 1973 and additional study was carried out during the remainder of that year. The report transmitted herewith is based on that additional study and constitutes the Department's final report to the Congress.

The required investigation of youth camp safety was carried out by contractors. One of them investigated the occurrence of illness, injury, and death among young people in approximately 200 youth camps, while a second collected and assessed the adequacy and enforcement of State laws and regulations. (The results of the survey of illness, injury, and death at the 200 camps is not fully reliable in

that the participating camp directors took part voluntarily. Therefore, the experiences of campers in these camps should not be interpreted as being typical of the experiences of young people attending youth camps throughout the country.)

This final report on youth camp safety is based on the findings of these contractors. It indicates that:

1. Serious illness and injury among the campers studied was not a major problem.

2. although no deaths occurred among the campers studied, 25 deaths associated with camping were identified from a letter survey of camps located throughout the country and from other sources.

3. there is no systematic or comprehensive monitoring of serious illness, injury, and death among summer youth campers by States or any other source.

4. only four States were found to have laws and regulations specific for youth camps and regulations which provided for the annual inspection of youth camps.

In consideration of these facts and limitations, the report recommends:

1. That States conduct surveillance of serious illness, injury, and also death among campers and develop legislation and regulations appropriate to the problem identified;

2. that the Department of Health, Education, and Welfare assist States in regard to surveillance, legislation, and regulation by means of technical assistance; and

3. that the Department work with other Federal agencies to assure that the applicable provisions of model legislation are applied to camping facilities under the control of Federal agencies.

Despite the shortcomings of the survey, the two major findings--that the incidence of illnesses, injuries, and deaths in summer youth camps does not appear to be a severe threat to youths, and that the laws of the States are generally inadequate--should be of value to the States, and to Congress in its deliberations, as well as to all those

individuals who have concern for the health and safety of young people in the special environment of youth camps.

Sincerely,

/s/ Caspar W. Weinberger

Secretary

Enclosures

report on
YOUTH CAMP SAFETY

Pursuant to PUBLIC LAW 92-318
April 29, 1974

U.S. DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
PUBLIC HEALTH SERVICE

REPORT ON YOUTH CAMP SAFETY

Pursuant to

PUBLIC LAW 92-318

April 29, 1974

U.S. DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

PUBLIC HEALTH SERVICE

Center for Disease Control

Atlanta, Georgia 30333

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INVESTIGATION OF YOUTH CAMP SAFETY

Introduction

Every summer, more than 7,000,000 youngsters attend camp* throughout the United States. While the exact number of these camps is not known. estimates range from 8,000 to 11,000. Children are sent to camp for experiences which are different from everyday home, school, and urban life; the camp environment is typically rustic, with a variety of active pursuits being carried on out-of-doors. Considering the millions of campers and staff persons involved in the youth camping enterprise, it is to be expected that many instances of illness and injury will occur, some of them undoubtedly serious or even fatal. However, the frequency and causes of such untoward incidents have never been accurately determined.

In June 1972, the Congress passed the Education Amendments of 1972 (Public Law 92-318). Title VI directed the Secretary of the Department of Health, Education, and Welfare (DHEW) to "make a full and complete investigation and study to determine:

(1) the extent of preventable accidents and illnesses currently occurring in youth camps throughout the nation;
(2) the contribution to youth camp safety now being made by State and local public agencies and private groups;
(3) whether existing State and local laws adequately deal with the safety of campers in youth camps;
(4) whether existing State and local laws relating to youth camp safety are being effectively enforced; and
(5) the need for Federal laws in this field."

A preliminary search by DHEW in 1973 revealed few comprehensive research studies on injuries and illnesses in camps, or on camp conditions. The existing studies were not useful in developing the data required by Public Law 92-318, as they were outdated or limited in geographical scope. Their definitions and data collection techniques differed to such an extent that a compilation of statistics would not be acceptable, and they did not report either the severity of camp injuries and illnesses or the circumstances surrounding occurrences.

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* A youth camp was defined for this study as any parcel or parcels of land having the general characteristics and features of a camp as the term is generally understood, used wholly or in part for recreational or educational purposes and accommodating 5 or more children under 18 years of age living apart from their relatives, parents, or legal guardians for a period of, or portions of, 5 days or more.

Since pertinent information was lacking, plans were made for an extensive evaluation of youth camp health and safety to be undertaken during the summer of 1973 to fulfill the requirements of the Congressional mandate. The Bureau of Community Environmental Management, DHEW, was assigned responsibility for the investigation and developed a plan for collecting the required information utilizing its own staff and resources. Subsequently, because of organizational changes within DHEW, it became necessary for this study to be conducted under contract. Somewhat later, responsibility for supervision of the study was transferred to the Center for Disease Control (CDC) in Atlanta, Georgia.

Although CDC is responsible for this report and its recommendations, much of the investigation to determine the extent of accidents and illnesses occurring nationally in youth camps was done by Century Research Corporation (CRC). The principal method CRC used was a sample survey from which reports permitting an estimate of the number and nature of medically attended camping injuries and illnesses for 1 camping season were obtained. Information was also gathered on health and safety conditions and other characteristics of the camp included in this survey sample.

A compilation and analysis of State and local laws pertaining to health and safety in youth camps was contracted with Computing and Software group, a Cordura Company (C&S).

The National Recreation and Parks Association (NRPA), as a subcontractor to CRC, was given the task of determining the contributions to camp safety which are being made by various private organizations and government agencies. NRPA and C&S assessed the adequacy of State laws and regulations pertaining to youth camps and judged whether or not the laws were being enforced.

TASK I: "THE EXTENT OF PREVENTABLE ACCIDENTS AND ILLNESSES CURRENTLY OCCURRING IN YOUTH CAMPS THROUGHOUT THE NATION"

A. METHODS

Sampling Procedure

A list of 5,293 youth camps in the 48 contiguous States was compiled. A cluster sampling plan was selected as the statistical basis for the survey and to minimize data collection costs. Clusters were groups of camps within 50 miles of each other and within the same State. The 20 clusters used in the field survey were chosen at random, 5 clusters each, from 4 geographic groups. However, it was later decided that States which were thought to have a reasonable body of laws and regulations pertaining to camps should be compared with States having comparatively few pertinent laws or regulations. And so, the following groups were selected: (1) a group of States called the "Laws" group (New York, Michigan, and New Hampshire); (2) a group of States called the "Comparison" group (Wisconsin, Missouri, New Jersey, and Maine); (3) a group of Western States (Washington, Colorado, Texas, and Arkansas); and (4) a group of Southeastern States (Georgia, South Carolina, Florida, and Pennsylvania).

Collecting Data

The collection of data was done by or at the direction of the contractor's personnel. Five survey forms were used for data collection in this study: a Camp Profile, Camp Census, Camp Environmental Survey, Camper Injury Report, and Camper Illness Report.

The Camp Profile form dealt with the type of camp (residential, travel, therapeutic, primitive, or adventure) and whether it was licensed or accredited. It also considered the health and safety resources of the camp in terms of staff, equipment, and procedures.

The Camp Census forms were completed for each camp session. This form showed the number of campers for the session by sex and age and the number of counselors by age group. It also contained an estimate of the time allotted for each activity and the number of campers who participated in each activity during the session.

The Environmental Survey form contained information on the water supply of each camp, the method of sewage and solid waste disposal, the food handling techniques and the general condition of the camp site and facilities. It was completed once during the camp season.

A Camper Injury Report form was completed for every medically attended injury occurring at a camp. The forms recorded the type of injury, the causative agent, and the events surrounding the occurrence. These were generally collected weekly.

A Camper Illness Report form also recorded each medically attended occurrence; forms were collected weekly. These forms described the type of illness and the treatment, and noted the past medical history of the patient and circumstances such as stress which might have contributed to the condition. On both the illness and the injury forms, there were questions regarding the camper's attention to camp rules prior to the occurrence.

Center for Disease Control Mail Survey

A questionnaire survey was carried out in the late summer of 1973 as an additional means of determining the extent of preventable illness and injury in youth camps. Questionnaires were sent to nearly 8,000 known camp operators with forms requesting information on the type of camp, number of camp sessions, length of each session, number of male and female campers for each 1973 session and the number of serious illnesses, injuries, and deaths.

Clipping Service

As an additional source of information, newspaper reports of serious illnesses, injuries, and deaths in youth camps were obtained during the summer of 1973.

B. FINDINGS

Injuries

1. Reporting

Camp personnel were requested to complete a report on each injury which was treated. Some camps did this with great care; others, however, submitted forms only on "significant" injuries. The definition of "significant" varied from one camp to another, depending on the workload, the number and types of health care personnel, and their cooperativeness. In addition, variations in camp operators produced irregular reporting. For example, the camps sponsored by the Boy Scouts of America are "unit-centered," and individual Boy Scout troops frequently handle minor first aid cases solely within the unit. Such cases would not come to the attention of health personnel completing injury forms for this study.

The effects of such variations are two-fold:

(1) Injury rates in the total sample are lower than would be expected had all camps consistently reported every injury no matter how minor.

(2) Differences in injury rates may reflect differences in reporting intensity rather than differences in the incidence of injury.

2. Rates

Rates have been computed as the number of cases per 1,000 camper days.* Altogether 4,150 injuries were reported, representing 5 to 6 injuries per 1,000 camper days.

3. Severity

The severity of the reported injuries varied widely. Most were minor or required little or no treatment. Because there was no clear basis on which to judge injury severity from the report forms, injuries were considered serious only if the camper either

(1) was sent home after the injury,
(2) was admitted to a hospital, or
(3) suffered permanent partial disability.

There were 54 injuries that met one or more of these criteria. When one considers only these severe cases, the injury rate drops from 5 or 6 per 1,000 camper days to less than 0.1 per 1,000 camper days.

Illnesses

1. Frequency

Camp personnel encountered problems in completing illness forms similar to those described previously for injury forms. Many campers reported to the camp infirmary with trivial ailments which would have caused no concern at home. These include mild headaches, stomach distress, and insect bites, sunburn, or minor skin irritations. Some camps reported all these cases, others did not. The rate for all reported illnesses for the total sample was between 9 and 10 per 1,000 camper days.

2. Severity

An estimate of illness severity was made by identifying those reported illnesses for which the camper either

(1) was admitted to the hospital,
(2) was sent home,
(3) suffered a permanent partial disability or worse, or
(4) had laboratory work performed in connection with the illness.

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* The injury rate reflects approximately the number of injuries that the health personnel in a camp of 165, the median size in this study, would see in a session of 6 days.

All cases so identified were reviewed individually to judge their possible severity. Of the original 7,323 illness reports, 216 were considered serious. Most of these were upper respiratory infections. However, there were also 3 cases each of mumps and chickenpox, 4 cases of possible appendicitis, and 3 of proven appendicitis. Also, there were 2 cases of suspected kidney infection. The rate of severe illness was 0.29 per 1,000 camper days in contrast to the overall rate of 9 to 10 per 1,000 camper days.

3. Disease Outbreaks

Except for the transmission of upper respiratory infection, only 2 disease outbreaks were clearly identified:

(1) An outbreak of gastroenteritis affecting 65 campers occurred at a camp of 180 capacity.
(2) An outbreak of gastroenteritis affecting 57 people occurred at a camp of 135 capacity.

4. Types of Illness

Upper respiratory infections were by far the single most common illness affecting campers. Other conditions included earache or infection, gastroenteritis, poison oak or ivy, insect bite, rash, hives, and minor psychological disorders (including homesickness). Many other conditions with vague symptoms were reported.

5. Mail Survey and Clipping Service

Of 7,861 questionnaires mailed out by CDC, 3,343 forms were returned and tabulated. The definition of "serious" stated on this form was as follows: "A SERIOUS ILLNESS or SERIOUS INJURY is defined as one in which the camper was sent to the hospital, an emergency room, physicians's office, or other medical facility located on or off the camp site and was subsequently unable to return to camp because of this injury or illness." There were 1,448 injuries, 1,223 illnesses of a "serious" nature and 9 deaths reported in the mail survey. Fifteen other deaths were reported by the clipping service. A local health department reported 1 additional death. It should be noted that 793 forms were returned to CDC unopened because the address was inaccurate or the camp no longer was operating.

C. RELIABILITY AND ANALYSIS OF DATA

Several limitations must be recognized when interpreting the results of the survey. One was the extremely high rate of non-response among camps initially selected. Out of the approximately 200 camps in the primary sample, only 128 were eventually surveyed. Additional camps were identified and agreed to serve as replacements. The resulting sample was, in fact, a selection of voluntary participants. One cannot assume that health problems exist in volunteer camps at the same rate with which they exist in camps choosing not to participate. Therefore, it is impossible to generalize from current survey data to the total population of summer youth camps.

Another limitation of the survey was that it was originally designed to provide estimates of the extent of preventable accidents and illnesses in 4 geographic regions of the nation. Subsequently, it was decided to compare the camps in States with camping laws to those in States having no laws. In order to do this, States in 2 of the geographic regions (Northeastern and North Central) were shifted. More appropriately, however, the nation should have been restratified, then a valid assessment based on the laws existing in each State could have been made. Instead, 2 of the original strata were reclassified on the basis of current information on State laws. The Northeastern stratum became the stratum with laws and the North Central stratum became the comparison. During the compilation of youth camp laws, it developed that the "laws" group containing Michigan, New Hampshire, and New York included 2 States that have youth camp legislation, but relatively few good regulations. The "comparison" group, containing Wisconsin, Missouri, New Jersey, and Maine, included 1 State with excellent regulations but no specific youth camp legislation or mandated inspection and 2 States which have an excellent voluntary regulatory program. Because of this, any comparison between the stratum with laws and the one without laws would be without statistical validity.

In general, the conclusions that may reasonably be drawn from these data are limited. It is not appropriate to project these findings to youth camps in general nor is it possible to make valid comparisons among groups of camps.

D. COMMENTS ON YOUTH CAMP MORTALITY

The fact that no deaths were reported from the camps included in the study and that the mail survey and the other sources revealed only 25 deaths is striking. The deaths which might be expected can be calculated as follows: During the course of one summer, approximately 7.2 million youths attend resident camps. The annual death rate for this age group (5-14 years) is 0.4 per 1,000 population. Therefore, during any year, we would expect 2,880 deaths among any 7.2 million persons in this age group. If the average time spent at camp for each person is 1 week (time at risk) then we could expect at least 55 deaths to occur among this group while attending summer camp, more than twice as many as discovered through the efforts of this study. This is a crude estimate which ignores population characteristics and other information essential to a refined analysis. Yet while we cannot conclude that camping is safer than staying at home, neither can we conclude that it is extremely hazardous.

TASK II: "THE CONTRIBUTION TO YOUTH CAMP SAFETY NOW BEING MADE BY STATE AND LOCAL PUBLIC AGENCIES AND PRIVATE GROUPS"

A. METHODS

NRPA mailed letters of inquiry to 59 national organizations they recognized as being involved in some way with camps and/or safety. The letter requested specific information on regulations, standards, and training programs and asked for copies of informational and instructional materials related to youth camping.

They also queried 4,000 members of the American Park and Recreation Society. These park and recreation professionals in local government positions across the country were asked to provide information relating to youth camp safety materials developed and used locally.

Visits were made by NRPA to selected State offices in 46 States to gather information about State and local government and private agency-sponsored training, instructional materials, etc., which might contribute to youth camp safety.

Other visits to selected organizations in the New York City and metropolitan Washington areas (such as Boy Scouts, Girl Scouts, American Red Cross, YMCA, YWCA, and Swimming Pool Institute) produced materials and other information on youth camp safety, the effectiveness of agency standards for camps, and agency education programs.

B. FINDINGS

National organizations, principally the American Camping Association, American National Red Cross, Boy Scouts of America, Girl Scouts of the U.S.A., Camp Fire Girls, Inc., 4-H, National Easter Seal Society for Crippled Children and Adults, the National Safety Council, and Young Men's Christian Association, provided most of the information on the contribution of private organizations to youth camp safety. These organizations (with the exception of the Red Cross) issue publications on camp standards, camp physical facilities, and the organization of camping programs. The American Camping Association, Boy Scouts, Girl Scouts, and Camp Fire Girls also conduct leadership and camp management workshops at both the national and local level. Other national organizations, such as the National Safety Council and the National Rifle Association, publish program and safety guides for summer camps. Other groups contribute expert advice and recommendations in many related areas. The Red Cross offers courses in water safety and first aid; the National Swimming Pool Institute publishes standards for swimming pools; the Boy Scouts, Girl Scouts, and Camp Fire Girls promote safety and health through merit badge requirements; and the U.S. Coast Guard Auxiliary provides training programs and publishes regulations about safe boating.

Other efforts are made but their impact appears to be small in comparison with that of national organizations. For example, some cities have resident camp programs and have developed material on safety in general programs and specific camp activities. A very few local agencies which sponsor camp programs have developed their own training manuals for use by counselors.

A few groups which pursue particular sports (white water canoers, for example) provide instruction to their devotees in the special techniques of the sport, including safety. And some colleges and universities offer course work in camp administration, leadership and supervision, child development, and first aid.

One can conclude that private national organizations are the principal contributors through their local affiliated organizations to youth camp safety. Local, unaffiliated organizations contribute minimally. Information and training produced by national organizations is not ordinarily known by and therefore is not accessible to non-members.

TASK III: "WHETHER EXISTING STATE AND LOCAL LAWS ADEQUATELY DEAL WITH THE SAFETY OF CAMPERS IN YOUTH CAMPS"

A. METHODS

State laws and regulations directly and indirectly applicable to summer youth camps were collected from the 50 States. A panel of consultants, experts on youth camping, was convened to recommend categories of law and regulation which should exist in each State to protect the health and safety of campers. These recommendations were made independently of existing law and regulation. The categories (9 major categories and 92 subcategories) were ranked in accordance with their importance to youth camp safety. This ranking was then used as a device for measuring the degree to which each State had adequate laws and regulations to deal with the important aspects of health and safety affecting summer youth campers.

The major health and safety aspects of resident camping identified by the jury were:

Camp Personnel - Including training for counselors in their specific jobs (e.g., aquatics or riflery); the ratio of counselors to campers; and the age requirements for counselors.

Program Safety - Including supervision of program activities by qualified staff members; the safety education of staff and campers in all program areas; the use and care of equipment; the operation of special program activities such as swimming, boating, canoeing, riflery, archery, horseback riding, and the use of natural bathing areas according to accepted standards.

Sanitation, Public Health, and Food Service - Including safe water supply; proper food handling, storage and refrigeration; sewage disposal; and sanitation of dishes and utensils.

Personal Health, First Aid, Medical Services - Including a qualified health supervisor on the staff; first aid training for staff and campers; a physician on call and emergency transportation available at all times.

The jury indicated that types of camping other than resident camps should be considered separately as follows:

Out-of-Camp-Trips and Primitive Out-of-Main-Camp-Trips - (whether on the camp property or in a completely different site, but emanating from the main camp). Most important in this type of camping were Personnel, Program Safety, Sanitation (water, toilets, sewage, garbage, sanitation) and Food (source, preparation, service, and nutrition).

Day Camping - Most important were Personnel, Program Safety, Sanitation, and Transportation.

Travel Camps - Most important were Personnel, Program Safety, Transportation, Sanitation, Health, and Medical.

As noted above the jury considered 9 categories and 92 subcategories of law and regulation important to youth camp safety. The existing laws and regulations of the 50 States and the District of Columbia were compared with these categories and subcategories to determine the adequacy of a State's law and regulation. It was determined that a State would be judged "adequate" if it: (1) had regulations specifically designed for youth camps; (2) had regulations that covered approximately 50% of the 92 subcategories identified by the camp panel and provided specifications which permit both the inspector and camp operator to know what is required for compliance; (3) provided a means for the State to identify all existing camps; and (4) authorized annual inspections of camps and provided for enforcement of regulations.

The jury expressed the following opinions:

There should be direct or enabling State legislation that either controls the operation of camps or permits the promulgation of regulations that have the effect of law.

There should be an annual license, permit or registration for camps.

There should be an annual inspection of camps.

Jurors generally favored an inspection each time the camp is used by a different operator during camping season.

The jurors were generally opposed to charging license or inspection fees.

The jurors approved a penalty clause for operators who refused to comply with the regulations.

The jurors opposed a Federally-administered regulatory program for travel camps, but were divided on State-administered regulatory programs for such camps. In case of State control, regulations should not impose a hardship on youth agencies sponsoring numerous travel camp trips.

The jurors also favored the required prompt reporting of camp-related death, severe injury, and severe illness and maintenance of retrievable records by the State in which the camp was located.

A single State agency should be responsible for the enforcement of camp regulations. That agency should have the power to impose penalties and also coordinate all other agencies which become involved in camp regulation.

The jurors favored training all State camp inspectors in the objectives of youth camping and in the purpose of inspections.

Finally, the jurors indicated that States should provide a means for camp administrators to participate in the development of regulations.

Conclusions of the Contractors, Panel, and Jury

Based on deliberations of its panel, NRPA concluded that: "With very few exceptions, State laws relating to camp safety were found to be grossly inadequate. In some States, they were completely nonexistent."

Laws specifically regulating resident camp health and safety were not inclusive enough to cover all areas of camp operations. For example, some laws do provide for basic health and safety considerations in the original construction, grounds and facilities of a resident camp, but make no provision for regulating safety programs or for staff requirements. Some States exempt camps operated by certain types of organizations from the regulations.

Where general regulations (not pertaining specifically to camps) do exist, they often are not adequate for the special circumstances of camps. For example, outdoor sanitary facilities can be safe and healthy, but no allowance is made for them in health and safety regulations designed for general food service or resident establishments. Another example is the camp dining facility constructed with rough-hewn boards or logs which conflicts with general food service requirements calling for washable walls.

Because camping is a unique experience, specialized laws and regulations relating to health and safety standards are required. For the most part they do not exist.

In the same vein, C&S commented that several States apply regulations to youth camps which were originally devised for restaurants, hotels, trailer camps, etc. Some of these regulations are not applicable to youth camps and if enforced would hamper the objectives of camping.

This contractor provided the following summary of the adequacy of State law and regulation:

There are currently 28 States with regulations specifically for youth camp safety. Of these States, 21 require an annual inspection. There are only 8 States which regulate about 50% or more of all recommended categories for resident camps. Of all the States, only 4 have adequate regulations which are enforced. Thirty-two States regulate fewer than 25% of the recommended areas.

TASK IV: "WHETHER EXISTING STATE AND LOCAL LAWS RELATING TO YOUTH CAMP SAFETY ARE BEING EFFECTIVELY ENFORCED"

NRPA personnel visited 46 States and contacted representatives of appropriate State agencies to ascertain the status of enforcement procedures. In addition the NRPA staff visited 4 States and reviewed actual records to determine if violations were noted, and if subsequent action was taken. Special attention was paid to camps chosen in 2 States included in the CRC survey to compare the violations found by the State inspector with those found by the CRC sanitarian. While this overall approach was far from comprehensive, NRPA interpreted its results as follows:

Enforcement is difficult at best and often impossible to manage with consistency. The inspections and subsequent enforcement of regulations are usually conducted by official State agencies or their local counterparts. The major function of the involved agencies is monitoring the operation of permanent camping installations that also demand additional attention during the summer. Because these agencies are frequently understaffed, the added responsibility of regulating summer camp health and safety is, on occasion, given secondary priority. Some summer resident camps are undoubtedly not inspected at all.

Involved agencies indicate that once inspections take place and violations are noted, enforcement and compliance represent a long process, the benefits of which do not justify the time and funds required. This is not to say, however, that reported violations which result in serious health or safety hazards are neglected in every State.

TASK V: "THE NEED FOR FEDERAL LAWS IN THIS FIELD AND OTHER RECOMMENDATIONS"

Youth camping in the United States has been developed and encouraged by numerous professional, voluntary, civic, and governmental groups. The wide diversity among youth camps reflects the varied objectives of their sponsors. Nonetheless, all youth camps share the common objective of providing young people with an enriching experience through stimulating exposure to an environment and to activities unlike those they encounter ordinarily.

The broad responsibilities for creating programs and supervising campers have traditionally been accepted by individual camp directors and camping organizations. State and local health agencies have been responsible for the environmental standards of camps, including water, food and general sanitation, responsibilities which are consistent with public health and preventive medical services delegated to such agencies. Federal agencies have occasionally provided technical assistance and consultation to youth camping through State and local health agencies and through the professional and voluntary camping organizations. Participation in developing plans for major camping activities (for example, the Boy Scout Jamborees), and assisting State and local health agencies in investigating and controlling camping-related illness outbreaks, have been the principal contributions to camping by Federal agencies.

This distribution of responsibilities for youth camping is consistent with the relative expertise of private camping and recreation groups and local, State, and Federal health agencies. However, the extent to which these groups and agencies have influenced youth camping has varied considerably. Many camps are unaffiliated with major camping organizations. Other camps, either affiliated or unaffiliated with camping organizations, are located in areas where the degree of influence or regulation by professional, voluntary, or governmental groups has been minimal. Yet other camps appear to have existed in relative or complete autonomy from outside influence and supervision. The extent of external control on the overall youth camping enterprise is undoubtedly extremely variable and is impossible to assess with consistency or confidence.

The investigation of summer youth camps which constitutes the subject of this report was undertaken to answer the 5 particular questions raised by Congress in PL 92-318. Despite its limitations, it has produced useful information including the following:

(1) The rates of severe injury and illness among campers attending the approximately 200 camps were extremely low, 0.1 per 1,000 and 0.3 per 1,000 camper days, respectively. No deaths were reported in these camps.

(2) The mail survey and other sources of information identified deaths, as well as severe illnesses and injuries, among campers attending camps which were not part of the survey.
(3) Undoubtedly, some of the severe injuries or illnesses and deaths noted above were preventable.
(4) No systematic reporting mechanism presently exists which provides reasonably complete information on the occurrence of severe injuries or illnesses and death associated with youth camps.
(5) Comprehensive State laws and regulations which are directly applicable to the special circumstances found in summer youth camps are lacking in most States.
(6) The enforcement of existing laws and regulations on summer youth camps is deficient.
(7) The information gathered from the approximately 200 study camps suggests that severe injuries or illnesses and death may occur with lower frequency among youngsters attending camps than occurs in this age group in the national population at large.

Some camping deaths, injuries, and illnesses are undoubtedly avoidable. Such accidental events occur within the distinctive and considerably varied context of camping. A productive attack against this camping-accident problem must recognize these lethal or serious events both as accidents (which are subject to an existing analytical and preventive methodology) and as events which are distinctive because of the setting in which they occur. The distinctiveness of the setting requires the modification or special adaptation of existing analytical and preventive tools, if this accident problem is to be dealt with effectively.

A concerted and harmonious effort which recognizes the available expertise and existing legal responsibilities necessarily involves Federal and State government, camping organizations, and camp operators. Such collaborative effort is essential in any undertaking to reduce accidental death, illness, and injury problems among summer youth campers. The State's role is central in any endeavor of this sort, because law assigns responsibility for public health matters to the State level of government. Therefore, the recommendations which follow recognize the primacy of State responsibility in matters affecting public health.

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RECOMMENDATIONS

(1) The enactment of Federal legislation to regulate youth camps is not recommended. The study does not clearly demonstrate the need for such legislation. Furthermore, prime responsibility for the development of legislation, regulation, and enforcement procedures affecting summer youth camps resides with State government.

(2) States should develop mechanisms which require the reporting of the illnesses or injuries and deaths in summer youth camps. Such data, combined with other information pertaining to youth camps, should be used as a basis for a more thorough understanding of these adverse events among campers and staff. The information obtained, which should be made available to camping professionals and regulatory agencies, should guide the further development of appropriate legislation, regulation, and enforcement practices. In line with generally accepted standards of preventive medicine and public health, improved communications are desirable between camping authorities and State and local health agencies for purposes of more adequately monitoring the health and safety in youth camps.

(3) DHEW should assist States with the measures outlined above by:

(a) Developing model legislation and regulations for States based on existing knowledge with the assistance of camping organizations and appropriate experts.

(b) Encouraging the adoption of such legislation and regulation.

(c) Providing technical assistance to States in the development and implementation of a reporting procedure and providing analysis of data submitted by participating States.

(d) Providing expanded consultative services to Departments of Natural Resources and other State agencies administering State programs concerned with camping and to camping organizations whenever their needs can best be met by Federal assistance.

(e) Develop a working relationship with those Federal agencies administering facilities used by the public for camping which results in instituting all applicable provisions of model law and regulation in such areas.

YOUTH CAMP STUDY



CENTURY RESEARCH CORPORATION

BACKGROUND

Each year, mainly during the summer months, millions of young people attend camps. Relatively little is known about their health and safety while camping. State and local laws regulating camper health and safety vary greatly. The U. S. Congress has held hearings on this matter and has proposed legislation for Federal standards for safe operation of youth camps.

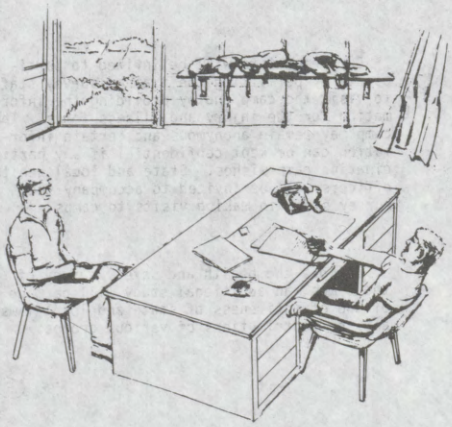
PURPOSE

As an alternative to such standards the Education Amendments Act of 1972 authorized a youth camp study including determination of:

1. Extent of accidents and illnesses.
2. Contribution to safety made by local and state agencies and private groups.
3. Adequacy of state laws.
4. Enforcement of state laws.

STUDY METHODS

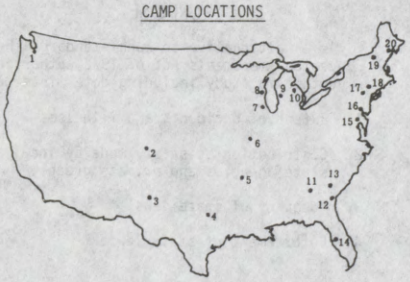
To determine the extent of preventable injuries, a direct in-camp survey will be conducted using the following forms: Camp Census, Camp Environmental Survey, Camp Profile, Camper Injury Report and Camper Illness Report.



A census report form will be completed for each camping session (frequently sessions are two weeks long); and an environmental survey and profile report will be filled out once for each camp studied; and an injury and illness report will be made following each incident.

About 200 representative camps throughout the United States will be studied during June, July and August 1973. These camps have been randomly selected.

CAMP LOCATIONS



Each dot represents a central location near which ten selected youth camps will be studied. States where camps are located are: 1--WA, 2--CO, 3 & 4--TX, 5--AR, 6--MO, 7 & 8--WI, 9 & 10--MI, 11 & 12--GA, 13--SC, 14--FL, 15--PA, 16--NJ, 17 & 18--NY, 19--NH, 20--ME.

Camp operators will be invited to participate by permitting the trained survey staff to visit the camp and by providing the information for the injury and illness forms. The camp may remain anonymous and certain information can be kept confidential if any participating camp wishes. State and local health officers will be invited to accompany the survey staff in making visits to camps.

Besides the health and safety survey of the camps, an additional study will be made of the effectiveness of state and local laws and the contributions of various groups.

EXPECTED RESULTS

The final report of the survey will include an analysis of the types, frequency, severity, and causes of illness and injuries in youth camps, as well as an assessment of the conditions and administrative practices of the camps as they relate to preventable illnesses and injuries. Also, a report will be made on the promotion of camp safety by state and local agencies and private groups and the enforcement of state youth camp safety laws.

A technical report of the findings will be made by the contractor to the U. S. Department of Health, Education and Welfare in the fall of 1973. This agency in turn will report to the U. S. Congress and the study findings will be made public.

This study is being conducted under the terms of Contract No. HSM 99-73-37.

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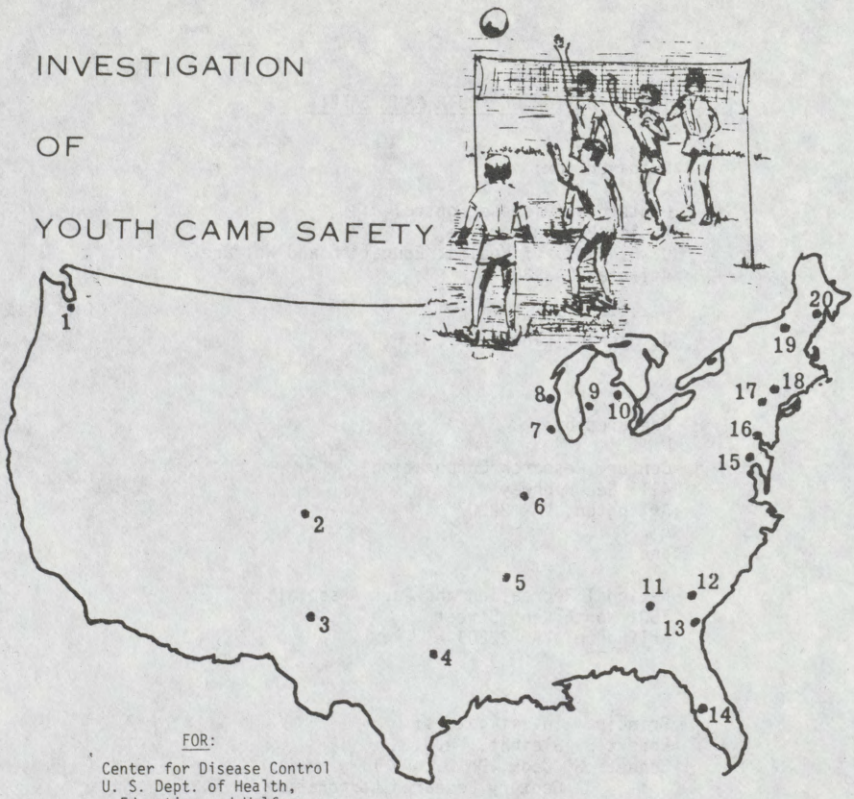
1973

S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S
JUNE					1	2	JULY							AUGUST						
3	4	5	6	7	8	9	1	2	3	4	5	6	7				1	2	3	4
10	11	12	13	14	15	16	8	9	10	11	12	13	14	5	6	7	8	9	10	11
17	18	19	20	21	22	23	15	16	17	18	19	20	21	12	13	14	15	16	17	18
24	25	26	27	28	29	30	22	23	24	25	26	27	28	19	20	21	22	23	24	25
							29	30	31					26	27	28	29	30	31	

INVESTIGATION OF YOUTH CAMP SAFETY



FOR:

Center for Disease Control
U. S. Dept. of Health,
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Atlanta, GA 30333

BY:

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CONTRACT NO. HSM 99-73-37

FINAL REPORT

JANUARY 1974

INVESTIGATION OF YOUTH CAMP SAFETY

Prepared for:

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Public Health Service
U. S. Dept. of Health, Education and Welfare
Atlanta, GA 30333

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ACKNOWLEDGMENTS

A study such as this which was national in scope and intensive is the work of many people.

The supervision of Dr. J. Michael Lane stands out as being helpful, constructive and encouraging as was that by his superior Dr. Bruce Dull. They were regularly assisted by a competent staff, principally Gordon Robbins, Stuart Kingma and Bradley Bridges.

The intial phases of any research are often difficult and require competence and perseverance. In this instance the planning by the original supervisory unit, the Bureau of Community Environmental Management was efficiently conducted; the detailed organizational and structuring aspects were performed in an outstanding fashion by Howard Kelly.

The high quality of the data was due in large measure to the Field Representatives who dealt adroitly with the many exigencies of the people and situations of over 200 camps in 15 states. The conscientiousness of the following are greatly appreciated:

J. Barry	G. Giltinan	S. Olmedo
B. Beul	D. Grumbine	J. Palmer
P. Brown	C. Harwood	T. Rideout
A. Edwards	C. Hibbitts	P. Russell
R. Fischer	D. Laforme	B. Sleight
M. Franklin	E. Mack	G. Sullivan
P. Funch	S. Miller	

The following Century Research Corporation staff performed effectively the many and varied essential duties in the conduct of this study:

H. Abbott	S. Shaffer
G. Martin	D. Sleight
A. Massiah	J. Staley
L. Peterson	E. Thal-Larsen
J. Reed	

They were ably assisted in data coding by a number of people, mainly students from Marymount College of Virginia.

Our several sanitarians and consultants provided highly professional services to aid and guide us. These men were:

A. Bigler	A. Peabody
W. Hopkins	S. Rogers
M. Held	G. Sutherland

Also, valuable service was supplied by a number of sanitarians from the staff of the Center for Disease Control.

Certainly, too, the staffs of the National Recreation and Park Association and Action Data Processing, Inc. contributed significantly to the laws analysis and processing of voluminous data, respectively.

Most important of all for the quality and timeliness of the study was the patience, friendliness, diligence, and honesty of camp staffs in providing the basic and essential field data; the health personnel, in particular, performed in an exemplary fashion.

To all of these people we express our thanks.

Kenneth G. Cook, Ph.D.
and
Robert B. Sleight, Ph.D.
PRINCIPAL INVESTIGATORS

INVESTIGATION OF YOUTH CAMP SAFETY

INTRODUCTION

Background

Camping in the United States is a thriving enterprise. Every year, millions of children are sent to camps by parents or organizations for a healthy change from school activities. For most of these young people, the weeks in the country do prove beneficial or camping would not continue to be so popular. However, illnesses and accidents occurring during the camp season mar the experience for many.

Undoubtedly, many camping mishaps and illnesses are avoidable. To what extent they could be prevented by more extensive regulation of youth camps is a question that has concerned private individuals and government authorities for several years.

A Connecticut resident, Mitchell Kurman, whose son was killed in a camping accident in 1965, has been largely responsible for focusing Congressional attention on the camp safety problem. In the late 1960's, Mr. Kurman enlisted the aid of Representative Dominick Daniels of New Jersey, who sponsored a bill requiring the establishment of minimum Federal standards for youth camps. Three Congresses (the 90th, 91st, and 92nd) held hearings on this subject. Several other bills proposing Federal standards, including that of Senator

Ribicoff of Connecticut, were considered and rejected by the legislators.

In the 92nd Congress, Representative J. J. Pickles of Texas presented the argument that more information was needed on present camp safety and health conditions before a decision could be made on imposing Federal standards. In June, 1972 the Congress passed Title VI of the Education Amendments of 1972 (Public Law 92 - 318) which directed the Secretary of Health, Education and Welfare to "make a full and complete investigation and study to determine:

1. the extent of preventable accidents and illnesses currently occurring in youth camps throughout the nation;
2. the contribution to youth camp safety now being made by State and local public agencies and private groups;
3. whether existing State and local laws adequately deal with the safety of campers in youth camps;
4. whether existing State and local laws relating to youth camp safety are being effectively enforced; and
5. the need for Federal laws in this field."

Previous Research

A 1968 survey by the American Camping Association listed approximately 10,700 resident and day camps in the United States, attended by over 7½ million children. Only 3000 of these camps were accredited by the Association; in other

words, less than a third of the nation's camps were known to conform to this Association's standards. It is estimated that approximately the same proportion of camps established since 1968 have been accredited by this Association.

Investigators for the Department of Health, Education and Welfare in 1973 found that there were few comprehensive research studies on accidents and illnesses in camps or on camp conditions. They determined that the existing studies were not useful in developing the National data required by Title VI of Public Law 92 - 318, as they were outdated or limited in geographical scope; their definitions and data collection techniques differed to such an extent that a compilation of statistics would not be acceptable, and they did not report either the severity of camp injuries and illnesses or the circumstances surrounding occurrences. Therefore, the extent and preventability factors were unknown.

The Present Study

As a result of the lack of data, the Department of Health, Education, and Welfare designed an intensive study of youth camp health and safety to be conducted during the summer of 1973. Much of the work was contracted with Century Research Corporation to investigate the extent of accident and illnesses occurring nationally in youth camps. The principal method was a sample survey from which reports permitting an estimate of the number and nature of medically attended camping injuries and illnesses for one camping season were obtained. In addition, information was gathered on health and safety conditions

and other characteristics of the camps included in the survey sample. A major portion of this report summarizes the findings from that survey.

The National Recreation and Park Association, as a subcontractor to Century Research Corporation, was given the task of providing the information required by the Department of Health, Education and Welfare concerning contributions to camp safety which are being made by various private organizations and government agencies. They also were responsible for determining the adequacy and effectiveness of State laws and regulations pertaining to youth camps. Recommendations for elements to be included in future governmental camp regulations are included in their portion of this report.

This document is divided into several parts. The Phase I survey of youth camps constitutes a major portion of the contents and describes the methods and results obtained. Phases II, III, and IV, which essentially constitute an analysis of youth camp laws and activities of various groups in youth camp safety, are summarized in a report of the National Recreation and Park Association which has been incorporated into this document. Voluminous appendices accompanying their report have been incorporated by reference only. Copies of these have been placed on file at the Center for Disease Control.

The final part of this document provides a brief summary of all phases of the study and the major findings.

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PHASE I. SAMPLE SURVEY OF CAMPS

PREPARED BY : Century Research Corporation

Sampling Procedure

If the results of a survey are to be considered valid for a total population, some form of sampling procedure must be used which will insure that all elements of the population have equal probability of being surveyed.

For this study, the population to be sampled consisted of "youth camps" in the 48 contiguous states. They are defined as overnight camps for five or more persons 17 years of age or younger. There was no single list of such camps available from which to choose a sample, and the Department of Health, Education and Welfare had to consult a number of sources in the preparation of a list. These sources included: lists obtained from 25 States; The National Directory of Accredited Camps for Boys and Girls, 1971, published by the American Camping Association, and an additional updated listing purchased from the Association; Guide to Summer Camps and Summer Schools; Porter-Sargent, 1971; Parents' Guide to Summer Camps, Shapiro and Jarmul; New York Times Sunday Magazine, various issues, 1973; The Easter Seal Directory of Resident Camps for Persons With Special Health Needs, 7th Edition, 1971, from the National Easter Seal Society of Crippled Children and Adults; Girl Scout Councils' Brochures; Skiing Magazine, Spring, 1973; and The Directory of Resident Summer Camps - Jewish Communal Organization, National Jewish Welfare Board. The resulting list

contained information concerning 5293 camps in the 48 contiguous States (excluding Hawaii and Alaska).

Normally, the most desirable research design would be a simple random sample but such a plan was not feasible for this study. A complete census of camps, necessary for random sampling would have been prohibitively expensive. An alternative cluster sampling plan was chosen which would (a) insure an equal chance of all population elements being included, (b) minimize data collection costs, and (c) insure the heterogeneity of the sample regarding types of camps, sponsors, location, and other factors.

The camps on the list were arranged by State and then assigned to camp clusters according to their geographic proximity. This was determined by the postal zip code of the camp address. No cluster crossed State lines. The goal was to have 10 to 12 camps in each cluster and a 50 mile limit on the distance between the camp locations in one cluster. Though the number of camps in a cluster did vary, the average was 11.2 camps. The number of clusters in each State ranged from one (Alabama, Delaware, Louisiana, Mississippi, Montana, Nevada, Utah, and Wyoming) to 40 in New York.

Originally, camp clusters were grouped according to location in the four geographical regions: the Northeast, Southeast, North Central, and West. An additional study requirement that camps in States with camping laws be compared to those in States having no regulations caused a reexamination of the geographic divisions. It was determined that 129 clusters in the states of New York, Connecticut, Illinois, Michigan, and New Hampshire

could be used to sample states having laws regarding camps. A comparison grouping, with 104 clusters, would come from Minnesota, Wisconsin, Iowa, Missouri, Delaware, New Jersey, Rhode Island, Maine, Vermont, and Massachusetts. The West grouping with 119 clusters, and the Southeast grouping with 120 clusters would be retained as geographical groupings.

Five camp clusters were chosen in random fashion for each of the four areas by first assigning random five-digit numbers to cards made for each cluster in an area. Then the cluster cards were ordered numerically (00000 to 99999) producing a random permutation of clusters. Finally, five numbers were randomly selected within the range of the cluster total for each area (that is, from 1-129 for the Laws group, 1-104 for the Comparison group, and so forth). These five numbers determined the particular clusters in each area chosen for the study. For example, selecting numbers 2 and 45 for the Laws group would mean that the second and 45th cluster, as previously ordered, would be included in the study.

The location of cluster areas can be fairly well understood by reference to a large community which is near the center of the cluster. These are as follows:

Cluster Number	City & State
01	Olympia, WA
02	Denver, CO
03	Abilene, TX
04	Huntsville, TX
05	Little Rock, AR

Cluster Number	City & State
06	St. Louis, MO
07	Waukesha, WI
08	Manitowoc, WI
09	Grand Rapids, MI
10	Flint, MI
11	Macon, GA
12	Savannah, GA
13	Hampton, SC
14	Lakeland, FL
15	Norristown, PA
16	Somerville, NJ
17	Monticello, NY
18	Poughkeepsie, NY
19	Hillsboro, NH
20	Portland, ME

Century Research Corporation employed Field Representatives to service each of the chosen 20 clusters. Generally speaking they were domiciled near the geographical center of the cluster area. The camp lists were given to the Representatives for a preliminary check to see if:

1. the camps existed and conformed to the study definition of a youth camp;
2. the camps were physically located within the cluster area; and
3. the camps would be operating in the summer of 1973.

The Representatives were asked to add names of any additional camps found in a cluster area to their list. Occasionally, a cluster would contain a camp address that was, in fact, the address of a director, owner, or sponsor and the camp actually was located far from the cluster area. Such camps were eliminated from the lists.

Table 1 summarizes the results for this process. As can be seen, the original listings contained 450 camps from which 161 were deleted. The largest sources of error were the listings for the Denver, Colorado and St. Louis, Missouri postal zip codes. These contained a number of addresses that were actually sponsoring organization headquarters or other offices.

Following this preliminary check, the adjusted camp lists for each cluster were arranged in priority order by random methods. The alphabetically arranged camp cards were assigned five-digit numbers from a table of random numbers and then the cards were reordered numerically.

Two-hundred camps were desired for this study, 10 from each of the 20 clusters. Therefore, the first 10 camps on each list were considered the primary sample and were the first to be contacted. If substitutions were required, they were made in order from the camps listed after the first 10. In other words, if Camp 1 was unable to participate, it was replaced by Camp 11 and the next refusal, by Camp 12.

Despite the preliminary screening, substitutions were necessary. Out of the 200 camps in the primary sample, 128 were surveyed. Twenty-seven camps refused to participate for

Table 1

Numbers of Camps in Original
Cluster Listings and in Adjustments
Encountered in On-Site Checks

Cluster Area	Number of Camps		
	On original list	Eliminated	Added
01	22	8	1
02	38	28	10
03	21	7	5
04	19	5	0
05	21	4	7
06	37	22	3
07	26	7	0
08	15	5	2
09	30	9	2
10	17	5	0
11	16	4	9
12	22	13	3
13	18	9	1
14	28	3	0
15	18	3	3
16	16	8	8
17	17	4	11
18	30	4	2
19	19	4	0
20	20	9	4
Total	450	161	71

various reasons. Some directors refused on advice from their lawyers. Some felt there was little benefit for them in a study which might lead to further regulation. A few did not want a sanitarian to inspect their camps and some said they wanted nothing to do with or for the Government. A more common reason was lack of time and staff to complete the survey forms. Directors were not pressured to take part in the study, but if they referred the decision to a higher authority (the sponsoring organization or absentee owner), that authority was contacted.

Of the remaining camps requiring substitutes, 13 were not residential youth camps, rather they were family campgrounds, day camps, and so forth. Three could not be located and five were out of the cluster areas. Eight were closed for the season and five more closed soon after the initial contact. Several were listed as separate camps, but proved to be divisions of the same camp. Six camps were dropped by the investigators when it was found that they were not providing the promised data.

Estimating Camp Population

In assembling the list of 5293 camps for cluster sampling, government statisticians recognized that certain errors and omissions could not be avoided. Source lists overlapped and therefore, some camps were listed two or three times if there were variations in the names or addresses. Occasionally, camps were included that did not meet the criteria of the "youth camp" definition. More significant were the possible omissions

occurring when camps did not appear on any source document listing.

Considering these errors, various estimates have placed the number of camps in the United States at 8000 to 11,000. The larger estimate apparently includes day camps and other categories not covered by this study. Therefore, it has been estimated that the government tally of 5293 camps was 48 to 67% of the actual total, or that it should increase by 51 to 108%.

However, when Century Research Corporation Field Representatives checked their cluster lists against the total camps they could locate in their areas, Table 1 (presented previously) shows they could add only 71 camps. If the 450 camps on the original camp cluster listing is used as a base number, the Field Representatives found 16% more camps; if the 289 camps on the corrected list are the base, the correction is 25%. In either case they found nothing approaching the 51% to 108% error indicated by other estimates.

Of course, this was not their primary task and it was often difficult for them to locate camps even when they were known to exist. However, considering the wide discrepancy in these figures it seems unlikely that there are 51% more camps in the country than are included in the government total.

Collecting Data

Five survey forms were used for data collection in this study: a Camp Profile, Camp Census, Camp Environmental Survey,

Camper Injury Report and Camper Illness Report. These forms were designed by the staff of the Bureau of Community Environmental Management of the Department of Health, Education and Welfare and after review by consultants, were field tested briefly by the American Camping Association. An evaluation of the field trial preceded development of the final forms. Copies of all forms are provided in a separate binder.

A Camp Profile form was filed for each camp by the Century Research Corporation Field Representative after an interview with the camp director or his designated subordinate. The Profile indicated the type of camp, whether it was licensed or accredited, and described the health and safety resources of the camp in terms of staff, equipment, and procedures.

The camp directors or staff members completed a Camp Census form for each camp session. This form recorded the number of campers for the session by sex and age and the number of counselors by age group. It also contained an estimation of the time allotted and the degree of camper participation for each activity during the session.

The Environmental Survey form collected information on the water supply of each camp, the method of sewage and solid waste disposal, the food handling techniques, and the general condition of the camp site and facilities. It was completed once during the camp season; in most cases by sanitarians or sanitary engineers from the Center for Disease Control or Century Research Corporation, in some cases, by the Field Representatives. If the Field Representatives did the survey,

it was filed in an abbreviated form in which they checked only those things which they felt competent to judge.

The Camper Injury forms were completed for every medically attended injury occurring at a camp. The forms recorded the type of the injury, the causative agent and the events surrounding the occurrence. These forms were filled out by the camp doctor, nurse, or other person treating the injury, and were collected weekly by the Field Representatives.

Camper Illness forms also recorded each medically attended occurrence and were collected weekly. These forms described the type of illness and the treatment, they noted the past medical history of the patient and circumstances such as stress which might have contributed to the condition. On both the illness and the injury forms, there were questions regarding the camper's attention to camp rules prior to the occurrence.

The Field Representatives were trained in the use of the survey forms and on public relations and interview techniques by supervisors from Century Research Corporation. It was the responsibility of the Representatives to make initial contact with the camp directors and staff and enlist their cooperation. As the study progressed, it was their duty to check on the completeness of the injury and illness forms before sending them to Century Research Corporation headquarters in Arlington, VA.

If for some reason, the Representatives could not obtain completed forms for a period, they requested the right to examine the camp infirmary logs and finish the forms themselves.

They also noted their own impressions of the camp, its personnel, and the quality of the data they were receiving on a separate report form provided confidentially only to Century Research Corporation.

YOUTH CAMP SURVEY RESULTS

Descriptions of Camps

Youth camps differ greatly in size, sponsorship, type of facilities, types of programs and so forth. In this survey, the Camp Profile Form was used to obtain a description of the facilities and the health and safety provisions of the participating camps. There are three principal reasons for concern with such descriptions:

1. In any comparisons of statistics from one section of the country to another or from different size camps it is well to know whether the samples are alike or different on variables other than those being considered.

2. The descriptions provide an indication of whether camps are currently meeting what might be minimum criteria in facilities and procedures for health care and safety precautions.

3. Should legislation be considered, the descriptions provide an indication of the numbers of camps that would currently meet the requirements.

Four major factors have been used in this analysis:

Size of camp defined by the bed capacity.

Accreditation defined by the camp director's indication of being accredited by some camping association.

Sponsorship has been analyzed by grouping individual sponsors into categories defining a major goal, interest, or group serviced by the sponsor.

Geographical area includes a group of camps located in states which currently have laws regulating youth camps and a group of camps in states roughly comparable in topography and location but which are in states which do not have such laws.

After a description of the camps in terms of these four factors, the major topics surveyed by the Camp Profile Form are summarized separately for each in those cases where this is appropriate.

Size X area. The median[1] camp size as defined by sleeping capacity was 165; slightly over a fifth (22%) of the camps had a capacity of less than 100 campers.

Table 2 shows the distribution of camps by size in the four sample areas. This sample yielded no camps in the West with fewer than 50 capacity. In fact, the West had the greatest proportion of camps of 200 and over and the largest median size as shown in Figure 1. Distribution of camp sizes in the Laws and in the Comparison samples was a bit different. The Laws sample had a greater proportion of its camps in the 100 to 149 sizes compared to the Comparison sample (30% and 16% respectively); while the Comparison sample was greater in the 150-199 sizes compared to the Laws sample (26% and 12% respectively).

Size X accreditation. While more than half of all camps were accredited by various camping associations, there were some significant variations among camps in different size ranges. Figure 2, for example, shows that only 17% of camps with a capacity of less than 50 had accreditation, while almost three-fourths of those in the 150-199 size range were accredited. Although the proportion of camps accredited rose

[1]The point in a distribution at which 50% of the cases are above and 50% are below is the median.

Table 2

Percentage of Sponsored Camps[a] of Given Size[b] in Each of Four Geographical Areas of the United States

Size	Area				Total Sample
	South /East (54)	West (52)	Laws (56)	Com- parison (50)	
Under 50	6	0	7	10	6
50 - 99	19	21	11	14	16
100 - 149	22	19	30	16	22
150 - 199	19	13	12	26	18
200 and over	33	46	36	34	37
No answer	2	--	4	--	1
Total[c]	101	99	100	100	100

[a]More than one sponsor may use a given camp property during the course of a season.

[b]Size defined by the bed capacity of the camp. Actual attendance at the camp will be equal to or less than these capacities.

[c]Totals more or less than 100 are due to rounding.

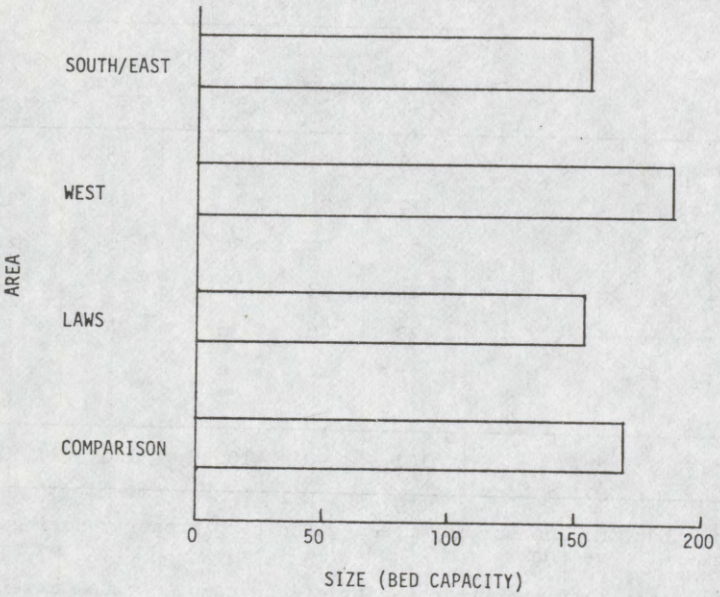

Figure 1. Median size of sponsored camps in the four sample areas.

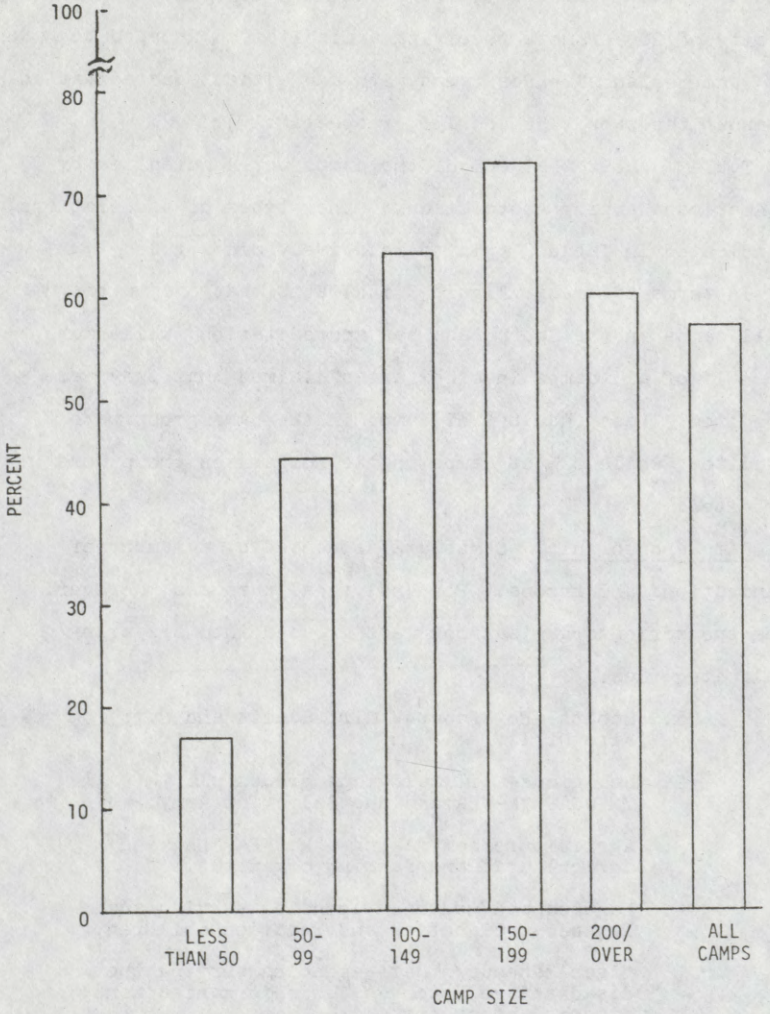

Figure 2. Percentage of camps of various sizes which were accredited.

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steadily as size increased, the percentage of camps with a capacity of 200 or more receiving accreditation dropped to 60%. The median size for camps with and without accreditation was about the same (152 and 150, respectively).

Table 3 shows that 80% of the camps were accredited by the American Camping Association. Other types of associations, as indicated in Table 3, played relatively minor roles.

In terms of areas, Figure 3 indicates that only a third of all camps in the South/East had accreditation, while more than half of all camps in other areas claimed that they were accredited. Less than 60% of camps in the Laws group were accredited, while 82% of camps in the Comparison group were accredited.

Camp sponsorship. Camps are sponsored by a number of organizations and groups. For analytical purposes, however, these sponsoring organizations were grouped into six principal categories:

1. Scouts--Boy Scouts, Girl Scouts and Camp Fire Girls.
2. Religious--all religious groups plus YM-WCA, YM-WHA and the Salvation Army.
3. Agriculture/homemaking--4H, FFA/FHA, and agricultural and farming organizations.
4. Handicapped/medical--agencies serving such groups as diabetics and retarded children.
5. Miscellaneous/other--agencies serving the disadvantaged such as Jewish organizations, Kiwanis and others.
6. Private camps.

Table 3

Distribution of
Accrediting Associations among
Accredited Camps

Association	Percent
American Camping Association	80
Regional and State Associations	5
Boy Scouts	8
Girl Scouts	4
YMCA	4
4-H Clubs	2
Other Associations	9

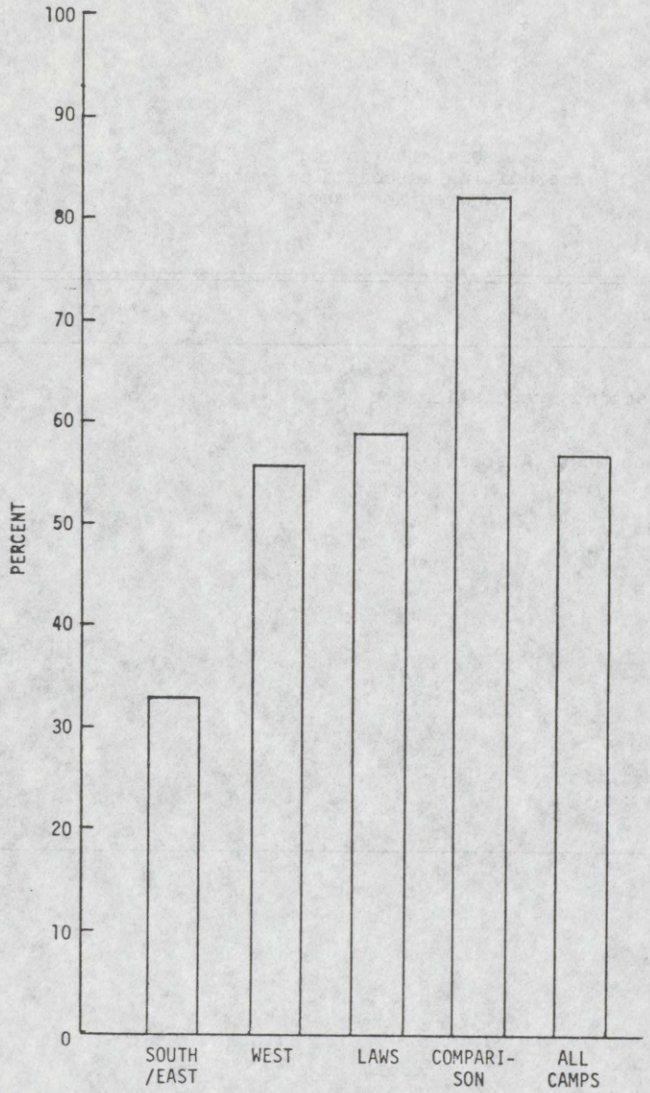

Figure 3. Percentage of accredited camps in each of the sample areas.

Figure 4 shows the median size for camps with each type of sponsorship. Although the Scouting/CFG group had the camps with the largest capacity in this figure, the camps sponsored by agriculture and homemaking groups had the largest camps in the sample with 7 of 9 such camps having bed capacities of over 200.

Among camps of less than 50 beds capacity, private, disadvantaged, and handicapped each were sponsors for a quarter of the camps; religious groups sponsored 17% and one Boy Scout camp represented the other 8%. Figure 5 shows the distribution of sponsors within each of the several groupings of camp size. Religious camps dominated in most groupings of size capacities above 50. The exception was in the 150 to 199 capacity in which the Scouting and Camp Fire Girls camps constituted 40% of the camps.

While about 40% of all camps were sponsored by religious organizations, only 36% of such camps had accreditation of any kind. This is demonstrated in Figure 6. Nearly all Scouting and Camp Fire Girl sponsored camps claimed accreditation of some kind, while 60 to 70% of other kinds of camps were accredited by some organization. Only 11% of agriculture/homemaking camps and 20% of handicapped/medical camps were accredited, but the numbers of these kinds of camps in the sample are much too small for definitive conclusions.

Table 4 shows that there were differences in sponsorship among the several areas of the country:

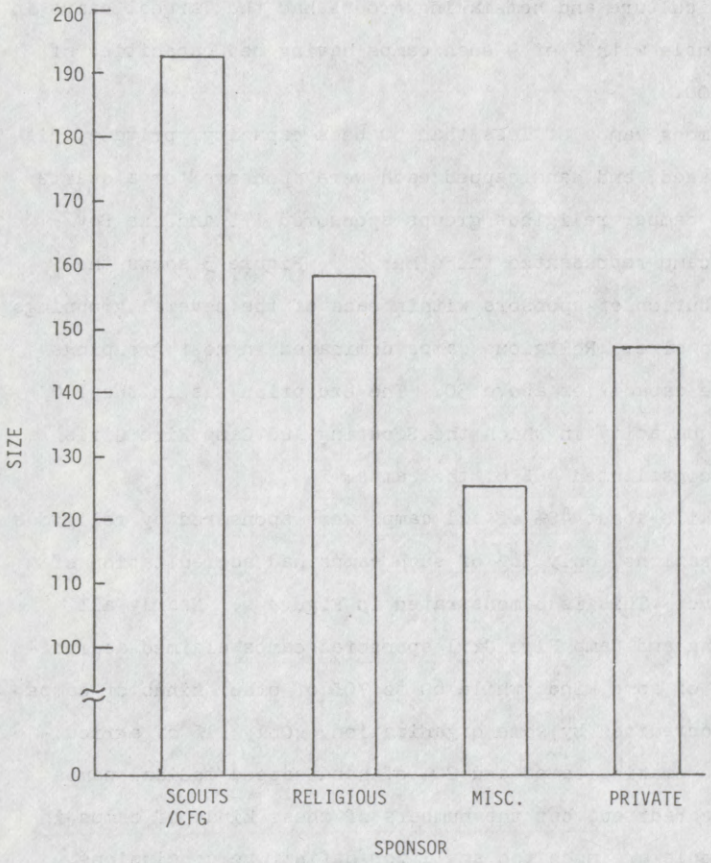

Figure 4. Median camp capacity for various types of sponsors.

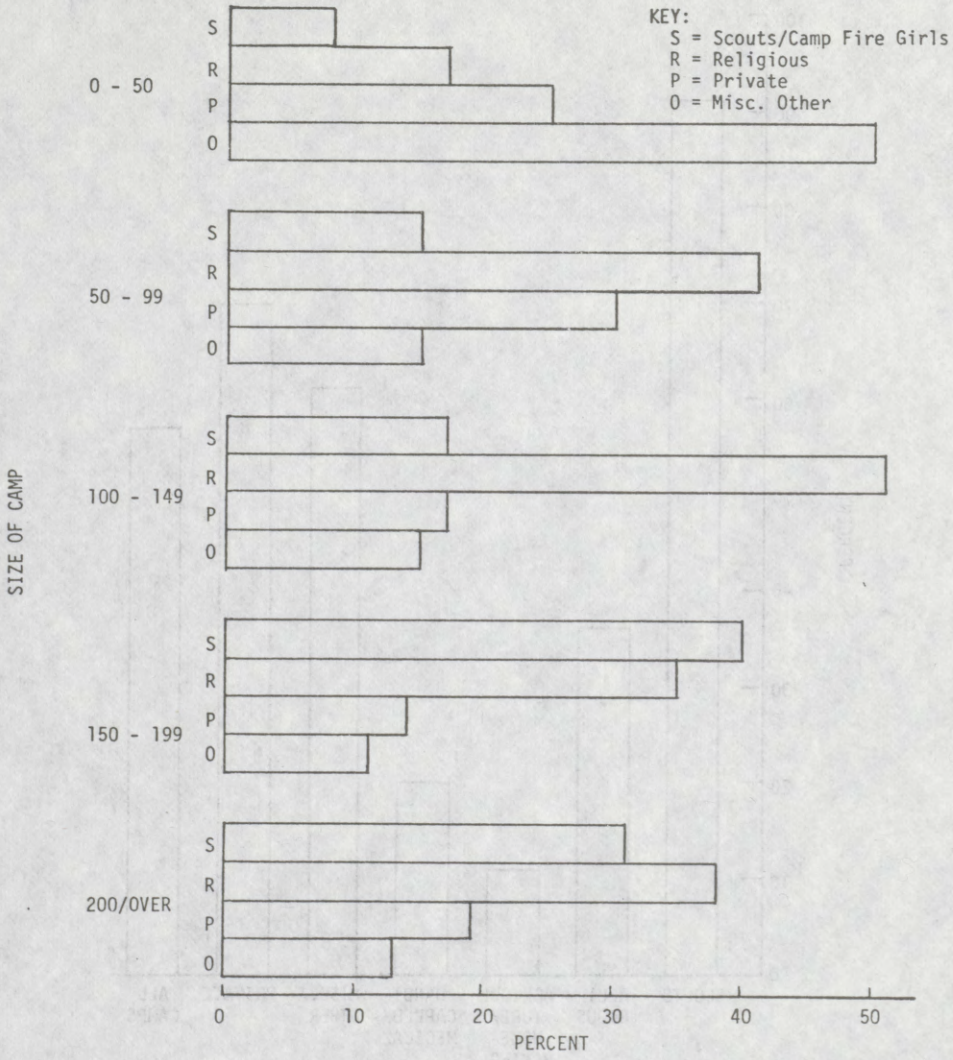

Figure 5. Percentage of sponsors within each size of camp.

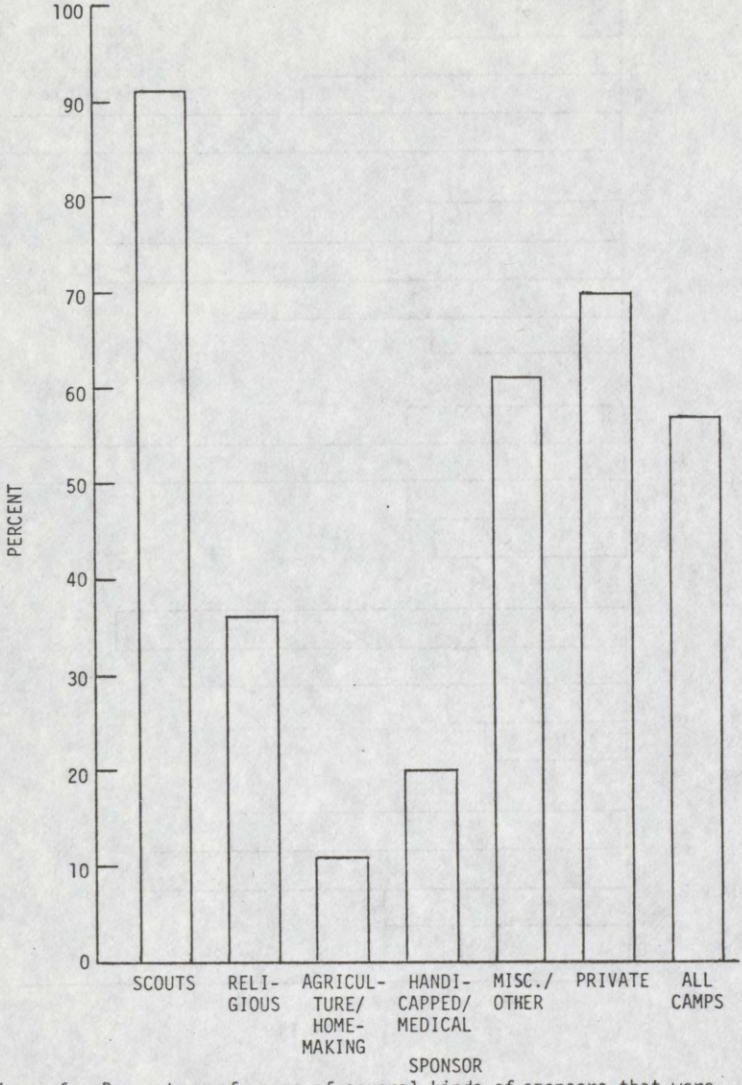

Figure 6. Percentage of camps of several kinds of sponsors that were accredited.

Table 4

Percentage of Types of Sponsors in Each of the Sample Areas

Area	Type of Sponsor				Total
	Scouts /CFG	Religious	Other	Private	
South/East	21	31	28	12	26
West	32	25	6	19	24
Laws	19	27	22	42	26
Comparison	28	17	44	28	24
Totals	100	100	100	101	100

1. There were more camps of the Scouting-type organizations in the West than elsewhere, and fewer in the Laws group than in the Comparison group.
2. There were more religious sponsored camps in the Laws group than in the Comparison.
3. Among the camps of "other" types of sponsors, there were very few (6%) in the West and a large percentage (44%) in the Comparison sample. In fact, there were twice as many in the Comparison as in the Laws sample.
4. There were more private camps in the Laws group than in the Comparison group.

In themselves, these differences have little meaning. However, there are implications for interpreting any differences between areas on other questions. For example, the higher number of religious camps in the Laws group as opposed to the Comparison group could partially account for the difference in percentage of camps accredited in these two areas since camps of religious sponsors are the least likely to be accredited.

Permits and inspections. One of the major items of interest in the Camp Profile was to determine the extent to which camps are required to obtain permits for their operation,

and the level of government at which permits were issued. Table 5 summarizes the major information on this point. While several kinds of permits were required, in most cases the number of camps that needed them was quite small. At least a few camps in every sample area said they required the following kinds of permits:

- o Health
- o Water or sewage
- o Kitchen or food handlers
- o Camp or temporary residence

Almost a third of the camps in the South/East area and in the Comparison area were required to have State health permits; 8 or 9% needed health permits issued at lower levels of government. Only 2% of the camps in the West area and 7% of those in the Laws group were required to have State health permits. However, camps in these areas reported needing "Camp" or "temporary residence" permits. In the West, 19% reported needing such permits issued by the state, in the Laws group, 16% reported needing such permits issued by the State and 12% reported needing county-issued permits of this type.

The other significant factor in permit requirements is found naturally enough in the Laws group. Michigan requires a "child care" permit and camps in other Laws states require permits issued by the State or county.

Permits were issued at all levels of government as indicated in Table 5, but most were granted at the State and

Table 5

Percentage of Camps in Each of Four Sample Groups which Indicated a Permit of a Given Type was Required

Agency Issuing & Type	Sample Area			
	South/East (54)	West (52)	Laws (56)	Comparison (50)
STATE				
Health	31	2	7	32
Water/sewage	6	10	2	2
Kitchen	7	10	7	2
Pool	2	2	-	-
Fire, bldg., elect.	2	2	-	4
Camp, temporary residence	2	19	16	2
Child care (Mich) "state" (other)	-	-	53	-
Other	-	17	5	14
COUNTY				
Health	9	8	9	4
Water/sewage	-	15	2	4
Kitchen	7	13	5	2
Bath	-	-	-	2
Pool	22	2	-	2
Fire, bldg., elect.	2	-	-	-
Camp, temporary residence	-	-	12	-
Child care, "state"	-	-	5	-
Other	2	-	2	2
LOCAL GOVERNMENT				
Health	-	-	-	4
Water/sewage	-	-	-	2
Fire, bldg., elect.	-	-	2	4
Other	-	-	2	2
NATIONAL ORGANIZATION				
Organization	2	-	7	4
Firearms	-	-	-	6
FEDERAL				
Firearms	-	-	-	2
OTHER				
Water/sewage	-	2	2	2
Fire, bldg., elect.	4	-	-	-
Other	-	2	-	2

county levels. The percentage of camps indicating permit requirements at local and Federal governmental levels, as well as permits issued by national organizations and other miscellaneous organizations, was minimal.

Permits may be issued which require nothing more than the payment of a fee; other permits require an inspection before they are issued. Over two-thirds of the camps in this study were required to have an inspection to receive a health or an operating type of permit (such as pools or temporary residence). However, there were wide variations associated with area of the country and other characteristics of camps as can be seen in Figure 7. Most notable is the fact that nearly all camps (96%) in the Laws group were required to be inspected before being issued a permit; only half of the camps in the Comparison sample so reported. In the South/East sample, 72% of the camps reported that an inspection was required while only half of the camps in the West so reported.

Private and religious sponsors were more likely than others to be required to have an inspection, and larger camps more likely than smaller to be required to have an inspection. Perhaps of some significance is the fact that there is no difference in the requirement for an inspection between those that are accredited and those that have no accreditation.

A particularly significant survey finding, as indicated in Figure 8, was the relatively large percentage of camps that were not required to obtain permits of any kind. While only one of the camps in the Laws group claimed not to be

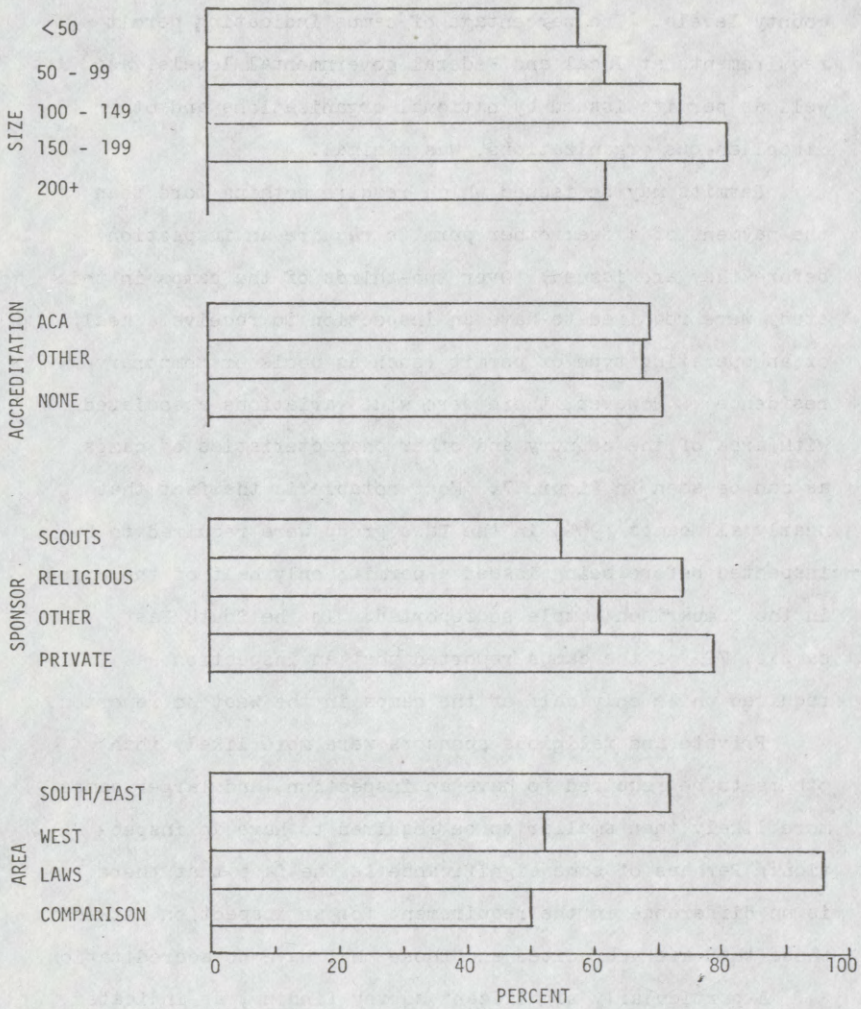

Figure 7. Percentage of camps required to have some kind of an inspection for a health or operating type of permit.

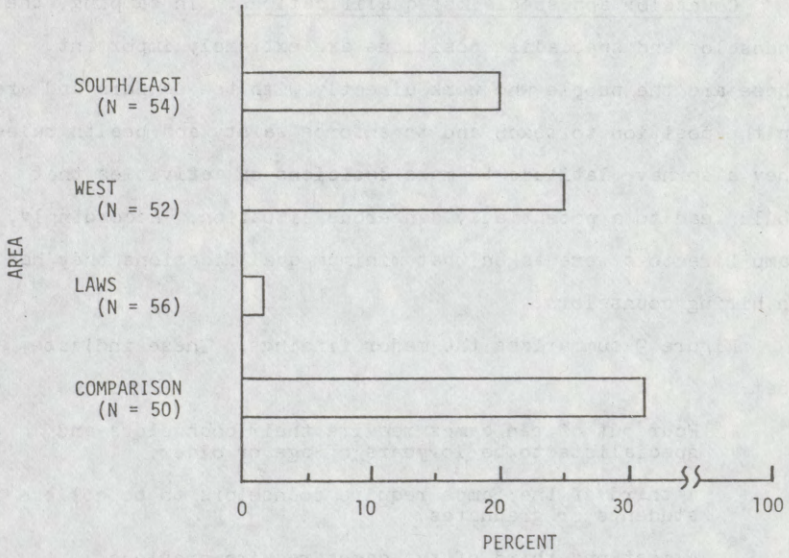

Figure 8. Percentage of camps in each of four sample groups that were not required to have any permits.

required to have a permit of any kind, one-fifth to one-third of the camps in other areas were not required to have any kind of permit.

Counselor and specialist qualifications. In camping, the counselor and specialist positions are extremely important. These are the people who work directly with the campers and are in the position to teach and to enforce safety and health rules. They also have latitude to make decisions on activities that could lead to a potentially dangerous situation. Accordingly, Camp Directors were asked what minimum qualifications they had in hiring counselors.

Figure 9 summarizes the major findings. These indicate that:

> Four out of ten camps require their counselors and specialists to be 18 years of age or older.
>
> A third of the camps require counselors to be college students or graduates.
>
> Almost one-third of the camps require previous counselor or camping experience or training.
>
> A quarter of the camps require experience related to their camp task, for example teaching experience if he is to conduct a class.
>
> About 15% of all camps required a certification in first aid, or some other area.
>
> One quarter of the camps specified a number of personal qualities such as responsible, good moral character, mature, and so forth.
>
> One out of six camps had a requirement for one week or more of pre-camp training.

For camps accredited by the American Camping Association, it was noted that only 19% of them reported a requirement for one week or more of pre-camp training, although this is a part

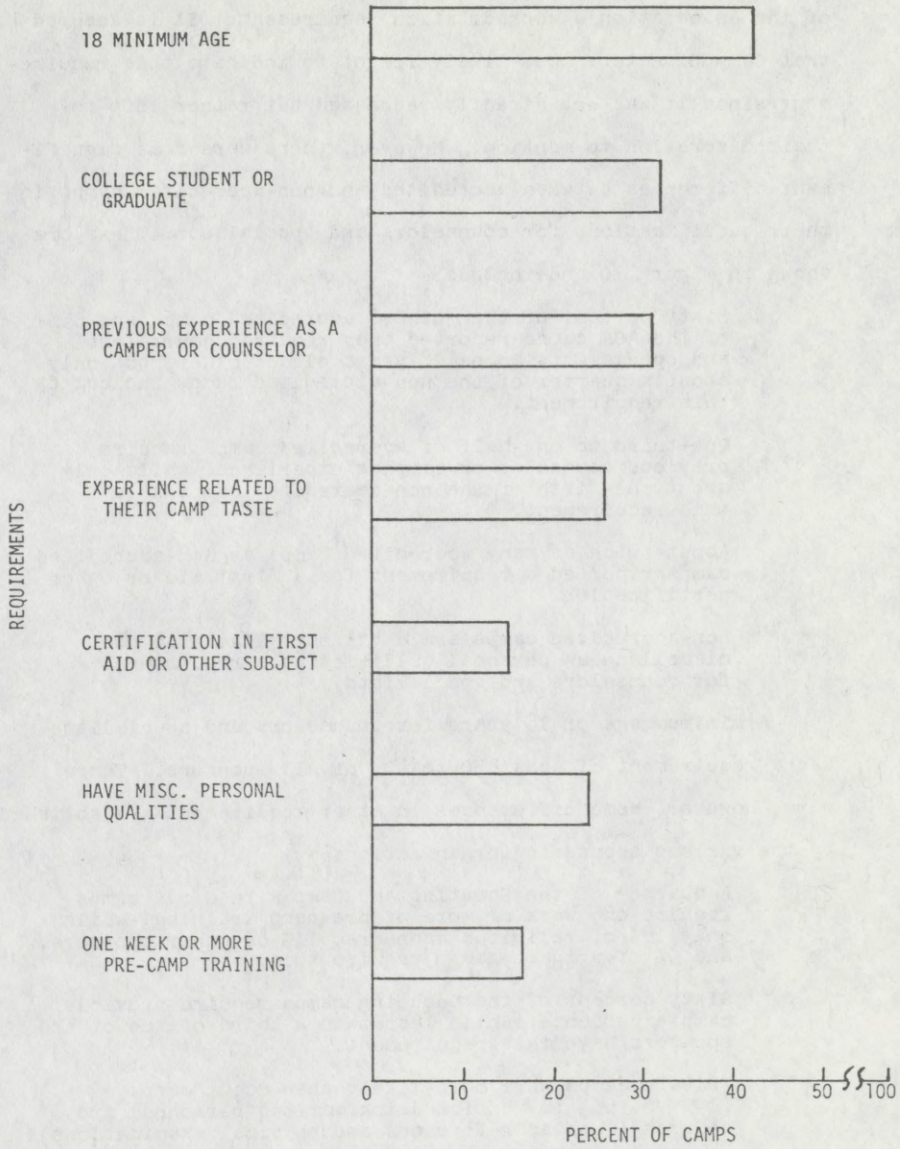

Figure 9. Minimum requirements for camp counselors.

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of the Association's accreditation requirement. It is assumed that Camp Directors most likely forgot to indicate this requirement since it was not directly requested but rather left to their discretion to mention. However, there were some significant differences between accredited and non-accredited camps in their qualifications for counselors and specialists. These are shown in Figure 10 and include:

> Sixty percent of the "other" accredited camps and 55% of the ACA camps reported they required counselors and specialists to be 18 years old or older, but only about a quarter of the non-accredited camps indicated this requirement.
>
> One-third to one-half of accredited camps require previous counselor or camping experience, while only about one-fifth of the non-accredited camps have this requirement.
>
> About twice as many accredited camps as non-accredited camps reported a requirement for a first aid or other certification.
>
> Non-accredited camps are a bit more likely to use miscellaneous personal qualities as a requirement for counselors and specialists.

A minimum age of 18 years for counselors and specialists was a requirement of about 30 to 40% of all sponsors. There were, however, some differences in other requirements established by the various sponsoring organizations:

> A quarter of the Scouting and Camp Fire Girls camps require one week or more of pre-camp training, while only 18% of religious sponsors, 11% of other sponsors, and 9% of private camps require this.
>
> Sixty percent of the Scouting camps require previous camp experience, while less than a third of the other sponsors have this requirement.
>
> Private camps were more likely than Scout camps (19% vs. 6%) to mention using various personnel procedures (such as references and physical examinations).

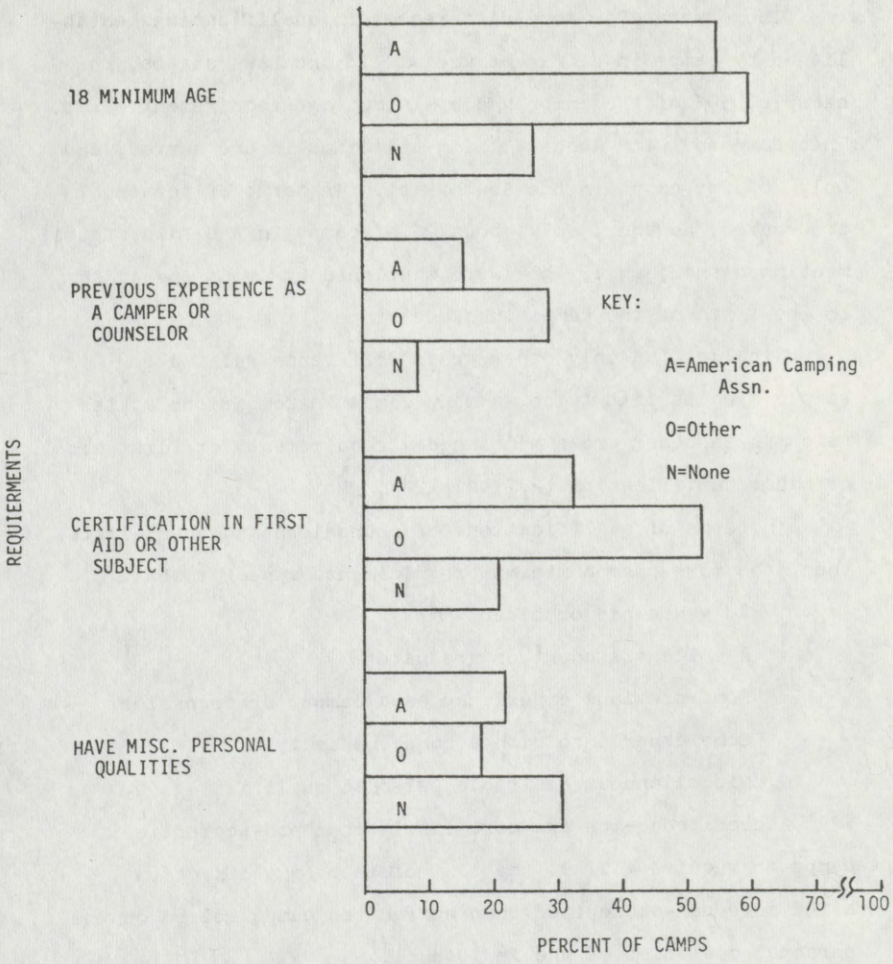

Figure 10. Minimum requirements for camp counselors in accredited and non-accredited camps. (Only those qualifications showing differences across accreditation are shown.)

There were also some differences in qualifications established by camps in different areas. In the Laws states, for example, 59% of the camps had a minimum age requirement of 18. This compares with about 40% for all camps in the survey, and only 26% for camps in the South/East. In terms of personnel procedures, however, only about 2% of camps in the Laws states mentioned them, while they were mentioned by about one-sixth to one-fifth of the camps in other states.

Finally, the only other gross difference related to sample area is that twice as many camps in Comparison states as camps in other areas mentioned a requirement for first aid or other certification (24% vs. 12%).

In terms of qualifications of counselors and specialists then, the more common minimum requirements appear to be:

18 years old or older

A college student or graduate

Some previous experience as a camper or counselor

Some experience with a camp specialty

Miscellaneous desirable personal qualities

Accredited camps are more likely than non-accredited camps to require all but the last of these qualifications; a few more non-accredited than accredited camps relied on the personal qualities of the individual.

Health care provisions. The most usual arrangement for health care at a camp is to have a registered nurse in residence (56% of the camps) and a medical doctor on call

(80% of camps). Medical doctors were also in residence at 5% of the camps and registered nurses on call at 15%. There are some differences related to size of the camp. Only 68% of the largest camps (those of 200 or more capacity) have a medical doctor on call, but 10% had one in residence; in the smallest camps (those under 50) 75% have a medical doctor on call but 17% have one in residence.

Some camps (13%) responded that they had paramedics in residence (but none reported them on call); there was little variation among camps of various sizes, with the exception that only 3% of the camps in the 150-199 size range reported resident paramedics.

In addition to medical doctors, registered nurses, and paramedics, other types of health personnel used by the camps were osteopaths, chiropractors, practical nurses, licensed practical nurses, and dentists. The use of these personnel was, however, very limited (less than 10% of all camps for any of these types of personnel either on call or in residence).

Concerning other types of special arrangements for medical care, almost a third of the camps indicated that they had an arrangement with a local hospital or medical center. In 14% of the camps, either the camp director or some staff member was qualified or certified in first aid, and 7% reported that counselors were either trained or certified in first aid. Less than 5% indicated other types of arrangements such as priority treatment from a physician

and miscellaneous other arrangements as, for example, an infirmary for diabetics.

Accreditation made little difference: 76% of non-accredited camps have medical doctors on call, which is only slightly less than the 80% for all camps; 20% of the non-accredited camps reported a registered nurse on call, as compared to about 15% for all camps. There is a possible difference between accredited and non-accredited camps in the number having registered nurses in residence. Between 60% and 70% of the accredited camps reported nurses in residence, but only 43% of non-accredited camps so indicated. It was noted, however, that a large number of the non-accredited camps failed to reply to this item. If all non-responses are disregarded, for both accredited and non-accredited camps, the percentages of camps reporting nurses in residence are more comparable:

ACA	80%
Other accreditation	82%
No accreditation	76%

The percentage of Scouting and Camp Fire Girls camps using paramedics is greater than the percentage of all camps (23% and 13%, respectively).

In terms of differences between sampling areas in the utilization of medical personnel, only 72% of camps in the South/East said they had a medical doctor on call as compared to 88% of camps in the Comparison sample. On the other hand, 7% of the South/East camps reported a medical doctor

in residence while none of the camps in the comparison sample indicated this.

In the West, 39% of the camps said they had a registered nurse on call compared to about 6 or 7% for camps in other areas. Western camps also used practical nurses and licensed practical nurses to a higher degree than did camps in other areas. For example, 15% of camps in the West indicated licensed practical nurses on call, compared with 2% or less of the camps in other areas.

Regarding personnel in residence, about two-thirds of the Laws and Comparison camps had a registered nurse, but only 41% and 48% of camps in the South/East and West, respectively, had a nurse in residence. Almost a third of the camps in the West reported paramedics in residence; this compares with less than 6% of camps in the South/East and Laws states, and only 12% of camps in the Comparison sample.

Nearly all camps (92%) reported that they had an infirmary. Bed capacity was:

Less than 10	80%
10 - 19	16%
20 or more	4%

Legal consent for first aid and medical treatment had been obtained by 90% of the camps. All camps claim to notify the parents in case of injury or illness and the most usual circumstances for such a call were:

38% If it required a physician or hospital visit

21% If "serious"

10% If some special procedure was required such as sutures, injections, and the like

Emergency transportation. One objective of the survey was to determine the amount of time required for the nearest rescue squad to reach a camp and the time required for traveling to the nearest hospital. Figure 11 shows the median number of minutes required for the nearest rescue squad to arrive at the camp. In terms of the breakdowns within different areas, sponsoring organizations, and accreditation groupings, there are no essential differences. In terms of size, however, camps with a capacity of less than 50 can be reached in almost half the time required to reach camps in other size ranges.

Figure 12 shows the median times required to get to the nearest hospital. In terms of areas, it takes almost 25% longer to get to hospitals in the Comparison sample than to hospitals from camps in the South/East. In terms of camps of different sizes, the shortest hospital travel times were reported for the smallest camps (less than 50) and the largest camps (those with 200 or more). For different sponsoring organizations, the shortest travel times were indicated by religious camps and "other" camps.

In order to provide emergency transportation, about two-thirds of all camps have a car on the premises that can be used. For outside help in providing emergency transportation, the essential survey findings were that:

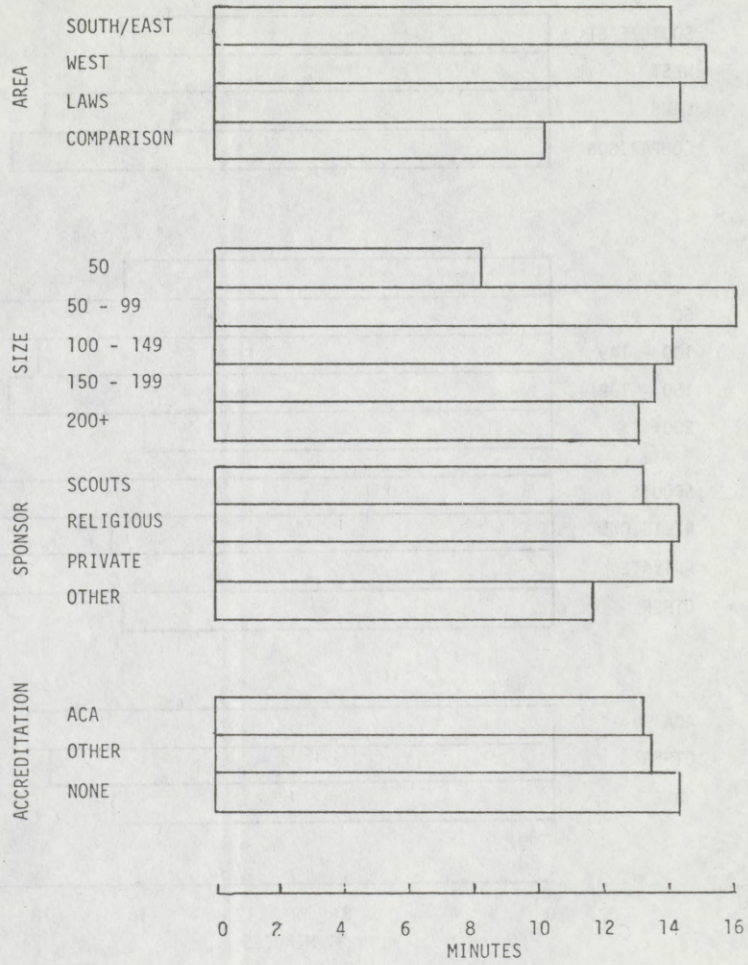

Figure 11. Median number of minutes required for a Rescue Squad to reach the camp.

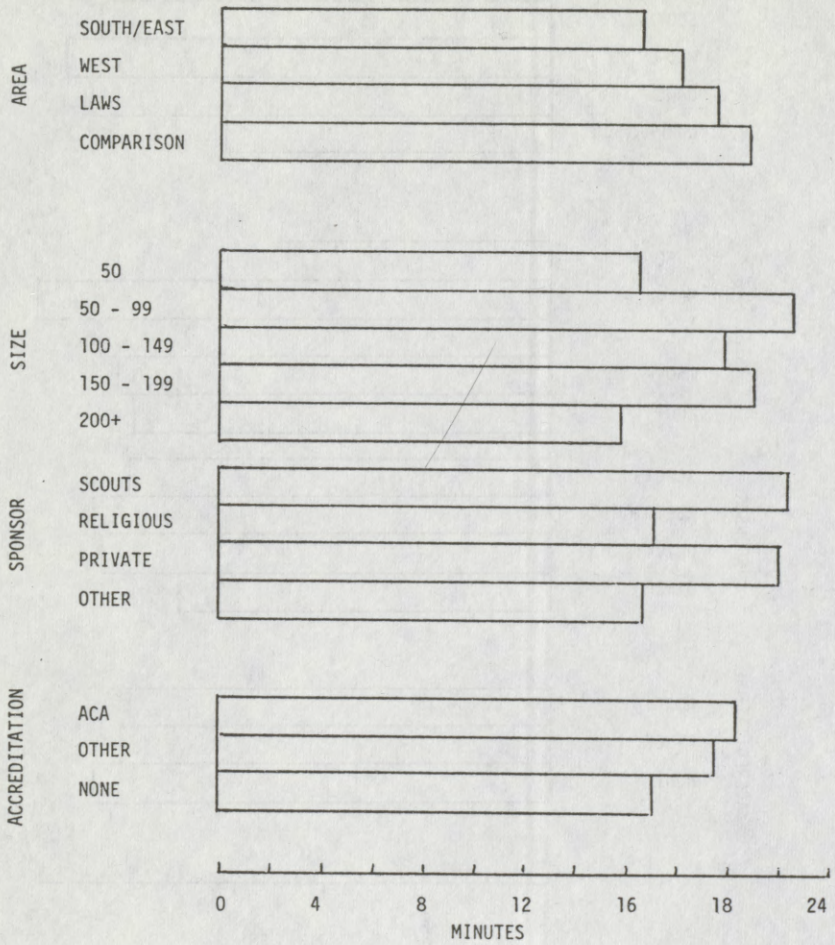

Figure 12. Median number of minutes required to get to nearest Hospital.

One-third of the camps use or have available commercial ambulance service;

One-third have hospital ambulance service;

Two-thirds can call on the police; and

Two-thirds can call on a fire department.

In terms of differences between areas, only 11% of camps in the West used commercial ambulances as compared to 24% in the Comparison sample and more than 40% of the camps in the South/East and Laws states. Another essential difference is that about 46% of camps in the Laws states use hospital ambulance service, while only 18% of Comparison camps use this service. However, about 38% of camps in the latter group use the rescue squad.

Pre-knowledge of health of camper. Most camps required a physical examination and claimed to accept applicants with medical conditions.

Over three-fourths of all camps, regardless of size, required a physical examination before admitting applicants as shown in Figure 13. There were, however, some differences among physical examination requirements in terms of accreditation, sponsors, and area.

Almost all camps approved by the American Camping Association and other agencies required physicals, while only about 60% of the non-accredited camps had this requirement as shown in Figure 14.

Among sponsoring organizations and groups, as shown in Figure 15, almost all private camps and camps sponsored by

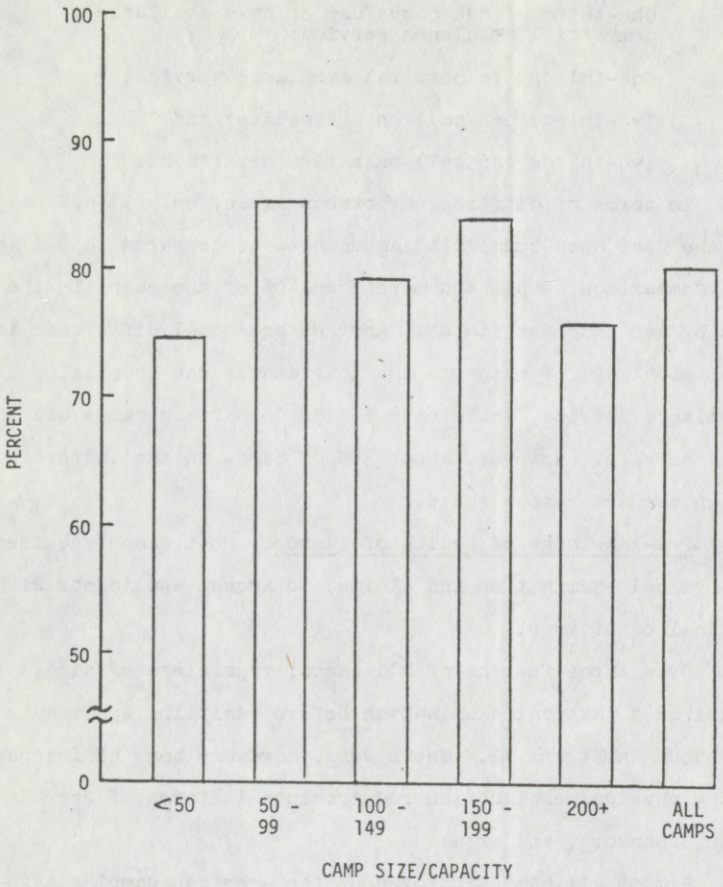

Figure 13. Percentage of camps of various sizes which require physical examinations of campers.

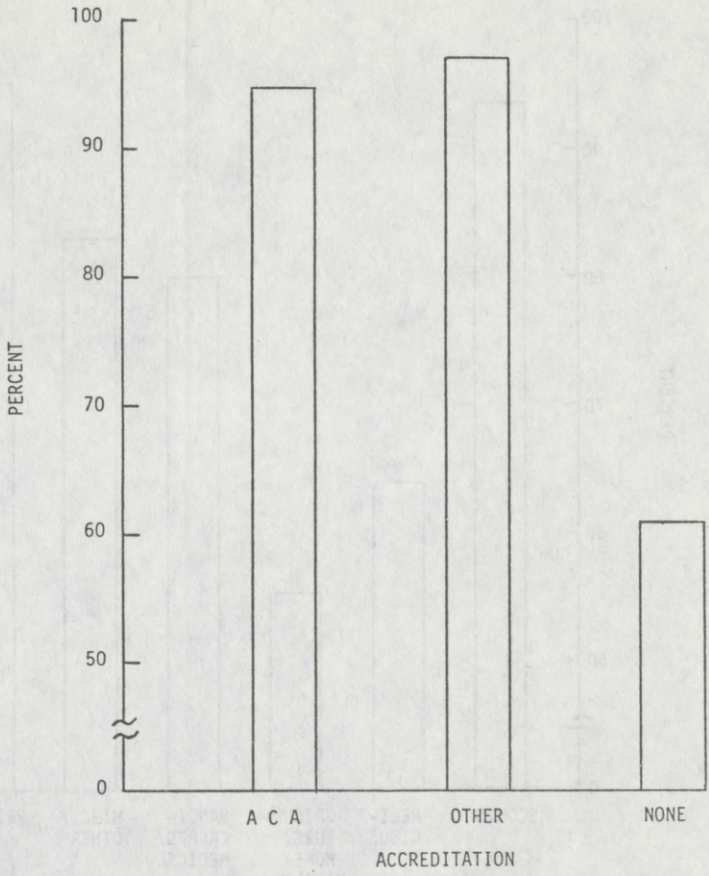

Figure 14. Percentage of accredited and non-accredited camps requiring physical examination of campers.

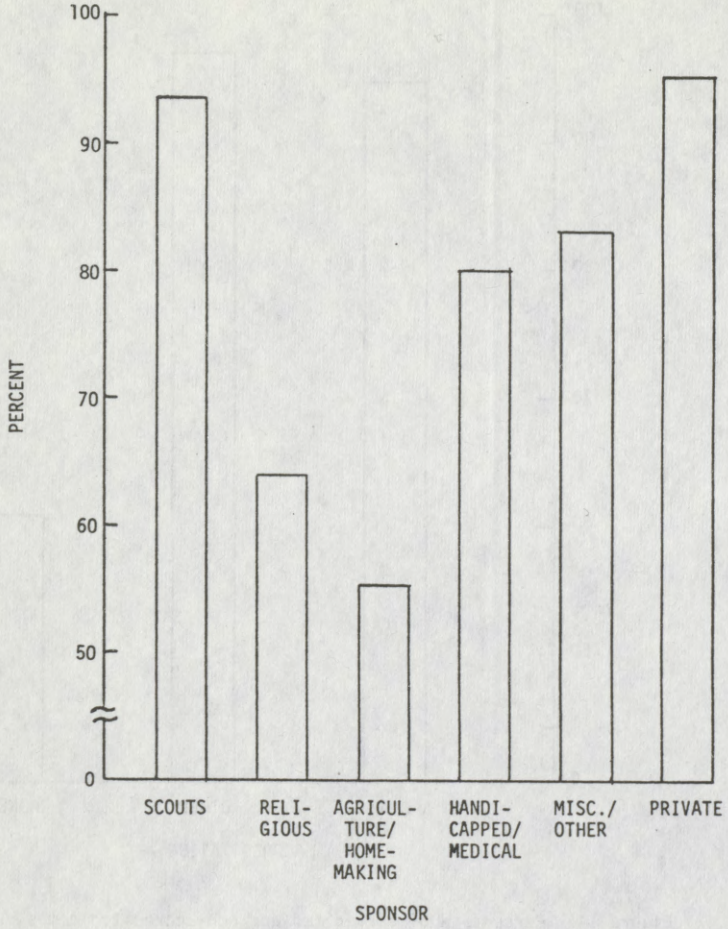

Figure 15. Percentage of camps of various kinds of sponsorship requireing physical examinations.

Scouting organizations required physicals; slightly less than two-thirds of the religious camps indicated this as an admission requirement. Although only 56% of the agricultural and homemaking camps indicated that a physical examination is required, the number of camps in this category is small (9).

There were wide variations among camps located in the four sample areas as indicated in Figure 16. More than 90% of camps in the Laws and Comparison groups required physical examinations. This compares with approximately three-fourths of all camps located in the West and less than 60% of camps in the South/East.

Except for the smallest camps (that is, those with a capacity of less than 50), more than 90% of camps of all sizes accepted applicants with medical conditions; 83% of the smallest camps admitted these applicants. On this point, there were no real differences between accredited and non-accredited camps, different sponsors, or the different sample areas.

Table 6 lists the medical conditions accepted and the percentage of camps accepting applicants with the specified condition. About a quarter of the camps accepted campers with asthma, allergies or diabetes. Fewer (16%) accepted epileptic or convulsive campers. About one in 10 accepted the physically handicapped, nonambulatory, or cerebral palsied camper and one in 10 accepted mentally retarded or mentally handicapped campers.

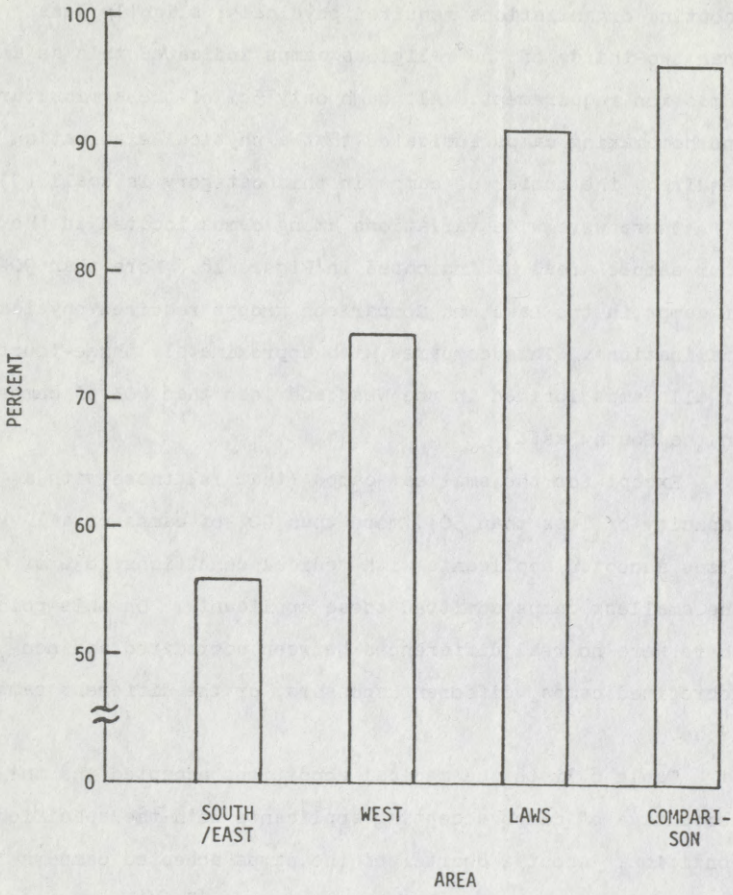

Figure 16. Percentage of camps in each sample area requiring physical examinations.

Table 6

Specific Medical Conditions
Accepted by Camps

Condition	Percentage of Camps That Accepted Specified Condition[a]
Asthma/allergies	28
Diabetes	22
Epilepsy/convulsions	16
Physically handicapped/non-ambulatory /cerebral palsy	10
Mentally retarded or handicapped	9
Blind/deaf	4
Hyperactive	3
Miscellaneous other conditions (including heart problems)	7
Conditions requiring doctor's/ parent's consent	29
Conditions that will not interfere with camp program	15
Conditions that are under control and can be handled by nurse or self-treated or must furnish own medication	5
All conditions with few exceptions --no communicable diseases	3
No response	10

[a]Percentages are based on 193 camps specifically indicating that they would accept medical conditions.

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Many camps, while stating that they accepted medical conditions, did so with some qualifications so that the condition would not interfere with the camp program. For example, 29% said they accepted conditions if a physician and/or the parent consented. This frequently meant that the physician had to certify that the child was able to participate in the camp program or that the normal camp program would not adversely affect the child. Another 15% specifically stated that the condition could not interfere with the camp program and 5% indicated that the condition must be under control so that (presumably) the camper could function in a normal or near-normal camp program.

Transportation. An area of concern in camp health and safety is the need to transport campers to the camp and to provide transportation for campers while in camp.

Four out of ten camps indicated that they furnished transportation to and from the camps. Half of the camps with less than a 50-bed capacity furnished transportation, but only about a third of camps with a capacity of 100-149 beds provided transportation. For camps with a capacity of 150-199 and 200 and over, however, those furnishing transportation made up about 40% of their respective groups as can be seen in Figure 17. With regard to the type of vehicles used by the 85 camps providing transportation, about one-third (34%) used chartered or commercial buses, almost one-half (45%) used school or church buses, and the remaining 21% provided a variety of vehicles, usually smaller types, such as automobiles, pickup trucks, and small vans.

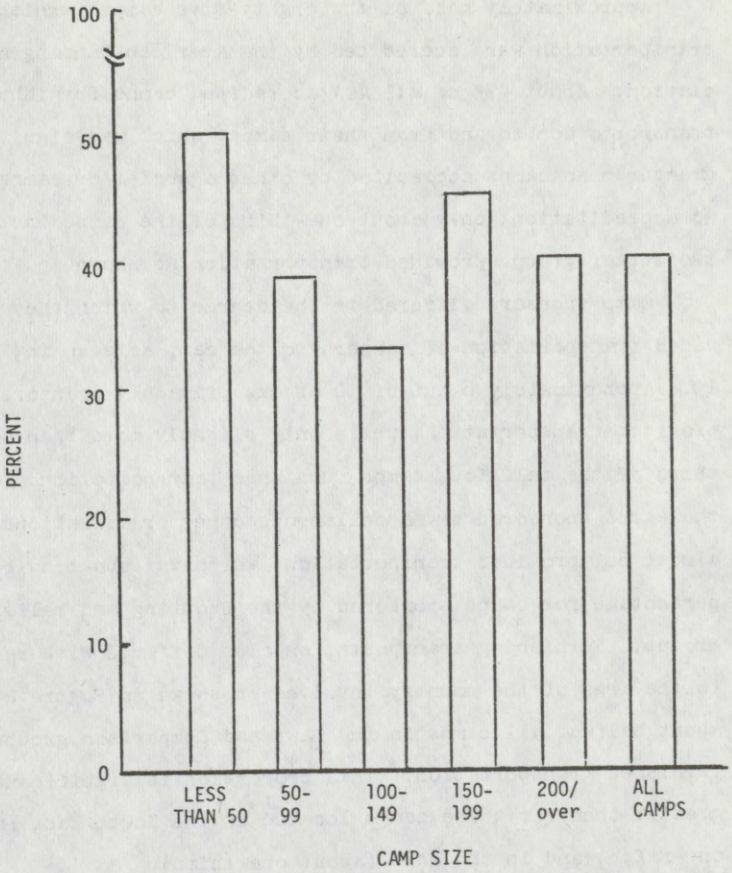

Figure 17. Percentage of camps of different sizes furnishing transportation to and from the camp.

Approximately half of the eighty-five camps furnishing transportation were accredited by the American Camping Association. About 47% of all ACA accredited camps furnished transportation to and from their camps, which was significantly greater than camps accredited by other agencies or camps with no accreditation; only about one-third of the camps in these two latter groups provided transportation as shown in Figure 18.

Camp sponsors differed in the degree to which they provided transportation of campers to the camp as seen in Figure 19. Approximately 6 out of 10 of the privately sponsored camps provided transportation, while only slightly more than one-third of the religious camps furnished transportation. Of the camps sponsored by miscellaneous other organizations, almost 68% provided transportation, which was about twice the percentage for camps sponsored by the Scouting and religious groups. Furnishing transportation also differed with regard to the area of the country involved as shown in Figure 20. About half of all camps in the Laws and Comparison groups furnished transportation. This proportion is significantly greater than for those camps located in the South/East (about one-fifth) and in the West (about one-third).

Once at the camp, campers may be transported in a variety of vehicles to nearby points of interest, cookouts, canoe trips and other activities either on or off the campground. A quarter of camps, however, said they provided no such transportation. Some kind of multipassenger vehicle such as a van or station wagon is the most frequently used mode, followed by

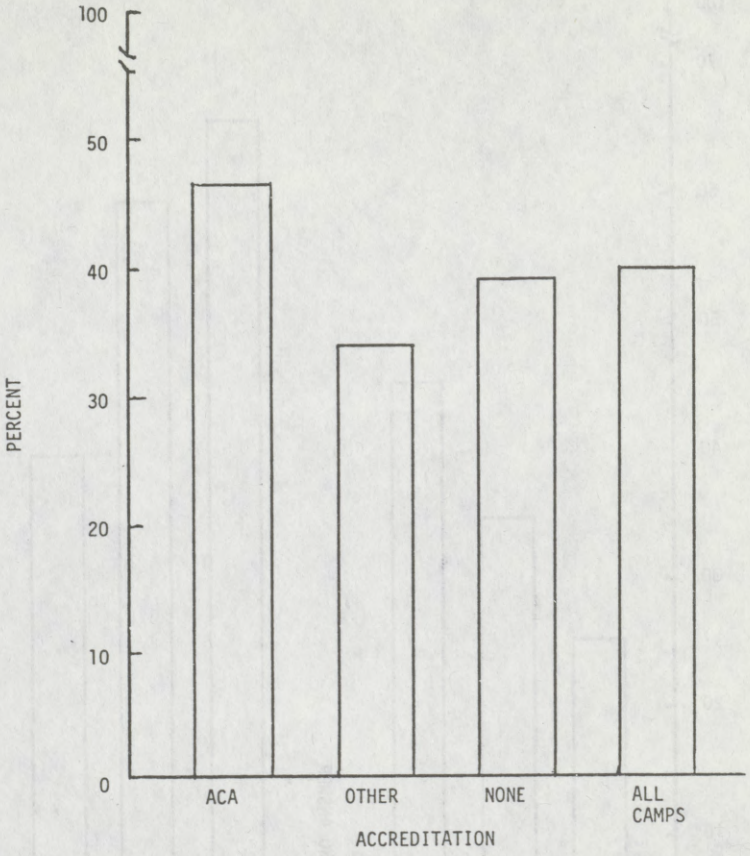

Figure 18. Percentage of accredited and non-accredited camps furnishing transportation to the camp.

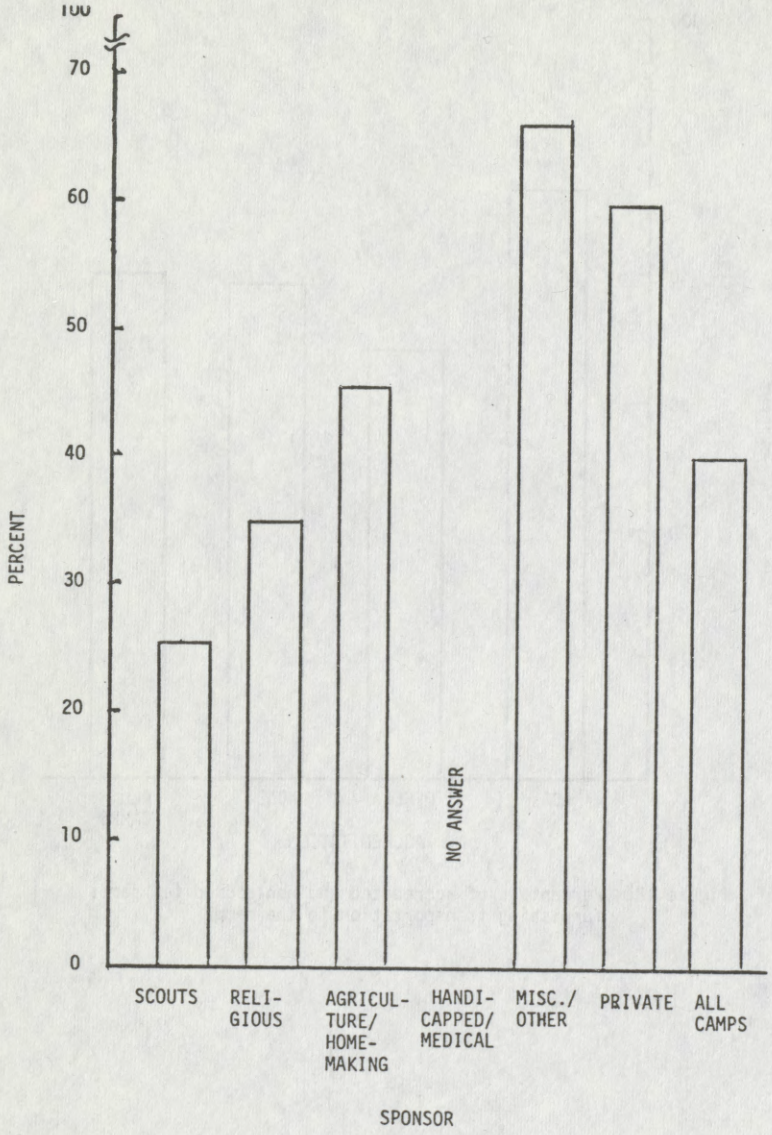

Figure 19. Percentage of camps of different types of sponsors furnishing transportation to camps.

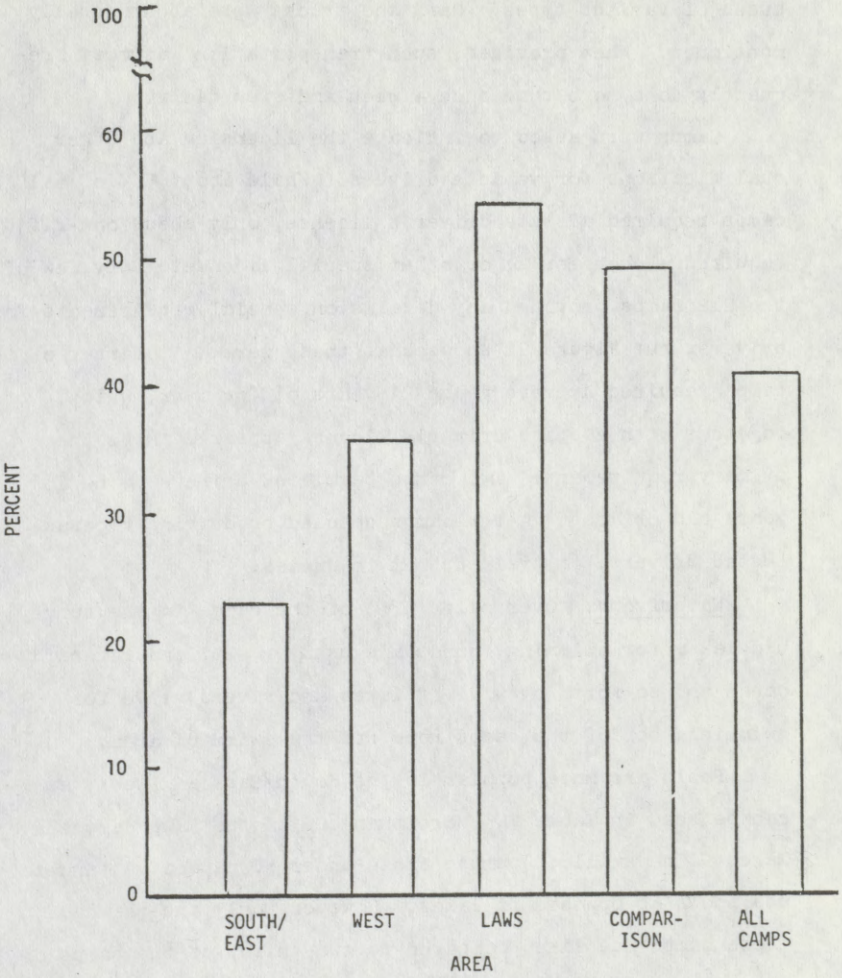

Figure 20. Percentage of camps in four sample areas furnishing transportation to the camp.

buses of various types. Cars and trucks were about equally mentioned. When provided, such transportation was most frequently done more than once a week and even daily.

Camps were asked to indicate the licensing and other qualifications for vehicle drivers. While about 56% of all camps required a state driver's license, only about one-fifth required a chauffer's, or other special license. Very few of the 212 camps provided any details on special requirements for drivers, but Figure 21 shows what these were. A quarter of the camps required drivers to be 21 years old or over, which, together with a state driver's license appeared to be the primary requirement. Two camps permitted drivers to be 16 years old or less. A few camps checked on driving records, tested drivers, or trained them in duties.

Waterfront. Over half (57%) of the camps in the survey use lakes for swimming; ponds are used by 42%; and rivers, ocean and so forth by 9%. If lakes and rivers serve for swimming, 88% of the camps rope off the swimming area.

Pools are more popular in the South/East and West, as can be seen in Table 7. More than 80% of the Laws camps have lakes. The smallest camps (those under 50 capacity) tend to use pools as opposed to lakes. However, only one-third of these camps use lakes compared to two-thirds of the camps of 150-199 capacity. The largest camps (over 200 in size) used pools almost as frequently as lakes.

More of the camps accredited by the American Camping Association have pools than those accredited by other

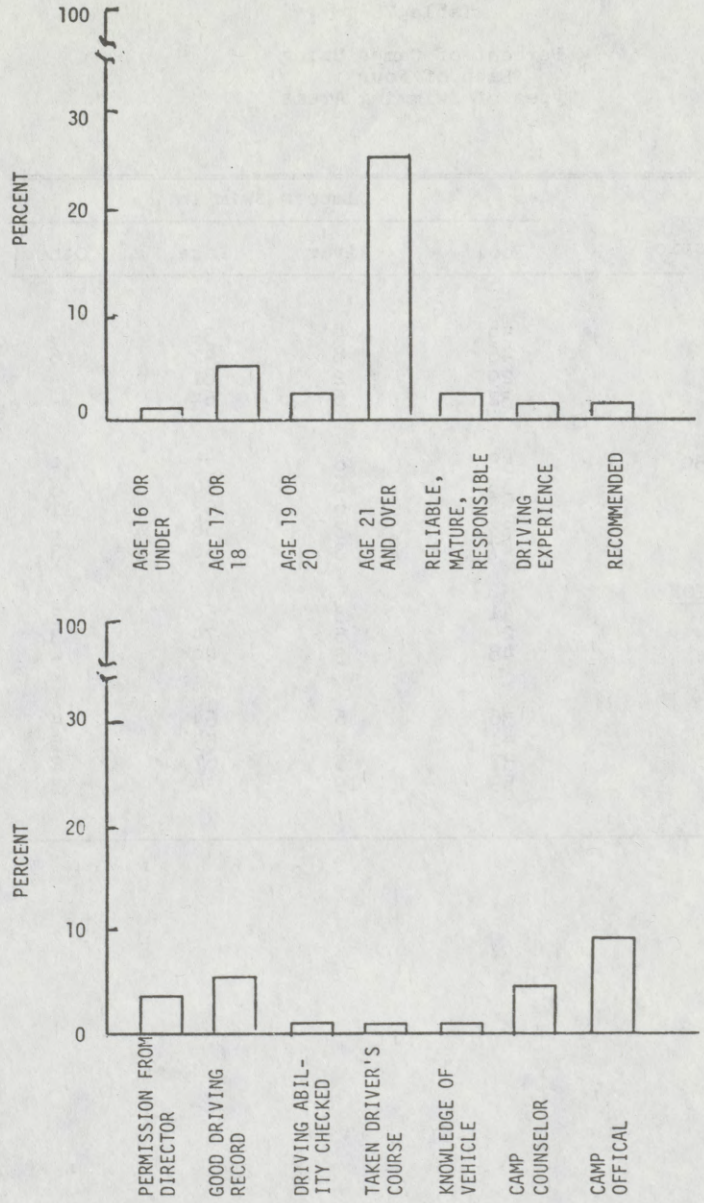

Figure 21. Age and other requirements of camps for drivers providing transportation for campers.

Table 7

Percent of Camps Using
Each of Four
Types of Swimming Areas

Camp Characteristic	Campers swim in			
	Pool	River	Lake	Other
AREA				
South/East	59	4	39	9
West	46	8	42	6
Laws	29	2	81	-
Comparison	32	6	64	-
SIZE				
Less than 50	58	8	33	-
50 - 99	35	6	50	3
100 - 149	38	6	53	11
150 - 199	35	3	68	-
200+	47	3	58	3
ACCREDITATION				
ACA	41	3	60	3
Other	24	5	74	3
None	48	5	49	-
SPONSOR				
Scouts	36	6	64	4
Religious	41	4	55	5
Private	37	5	67	2
Other	59	19	34	3

associations. The non-accredited camps are almost evenly divided as to those using pools and lakes. There are nearly twice as many private and Scouting camps with lakes as there are with pools. The religious camps are more evenly divided (55% vs. 41%).

The 212 camps reporting on the rescue equipment available for their swimming areas generally listed more than one type. Over half of the camps had boats (54%), which is not surprising since over half had lakes. Ring buoys were used by 85%, heaving lines by 57%, shepherd's crooks, 40% and poles, 40%.

A fifth of the camps had no watercraft available. Canoes were owned by 60%, rowboats by 51% and sailboats by 32%. The majority (71%) of the camps required one Coast Guard-approved flotation device per person in a boat. The remaining 29% with no such requirement include camps with no waterfront or with no boating activity. Nearly half (47%) of the camps required that flotation devices must be worn whenever the camper is in watercraft; 21% required that they be worn by their non-swimmers.

Camps were also asked about the certifications of their staff. Although a precise interpretation of the adequacy of the numbers of staff would require a computation of specific ratios of staff to campers, such computation was not possible. A general indication of the numbers of certified staff at camps of various characteristics can be gained from Figure 22. This figure shows the average numbers of staff certified in Junior Lifesaving, Senior Lifesaving, and as Water Safety Instructors

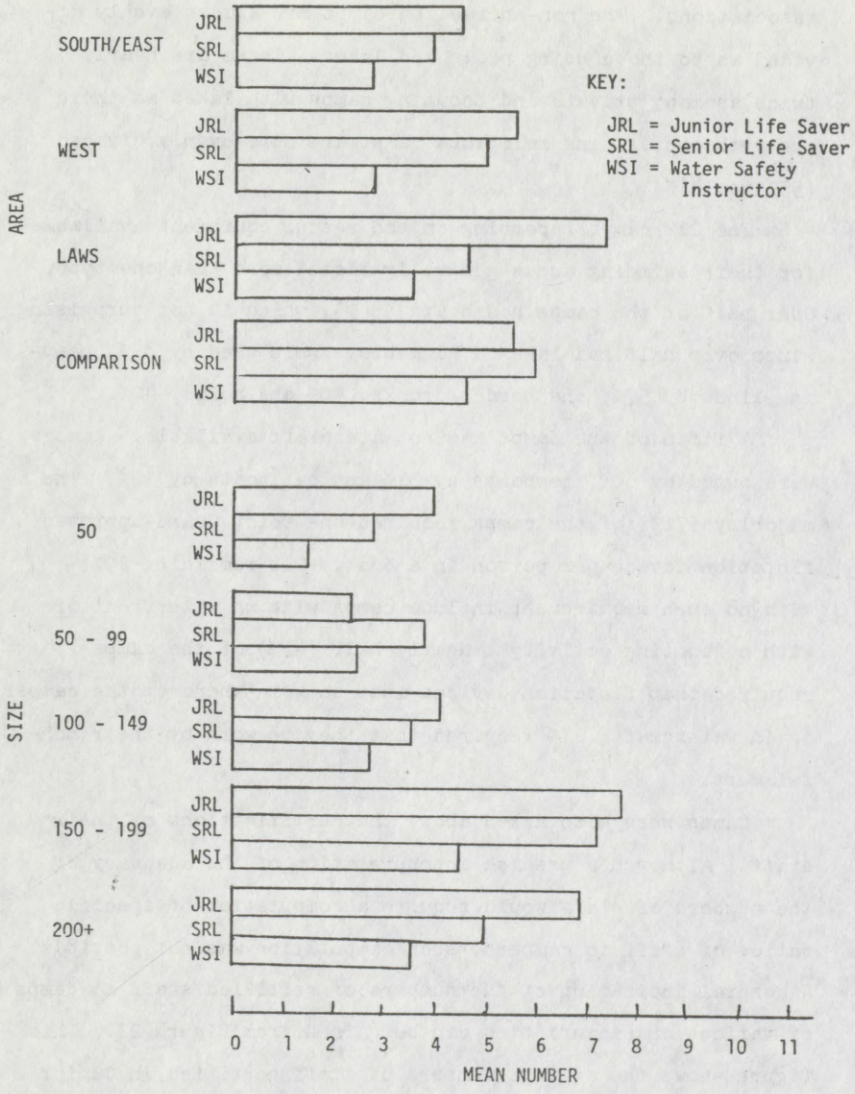

Figure 22. Mean number of camp staff certified in Junior and Senior lifesaving and as Water Safety Instructors for camps reporting any such staff.

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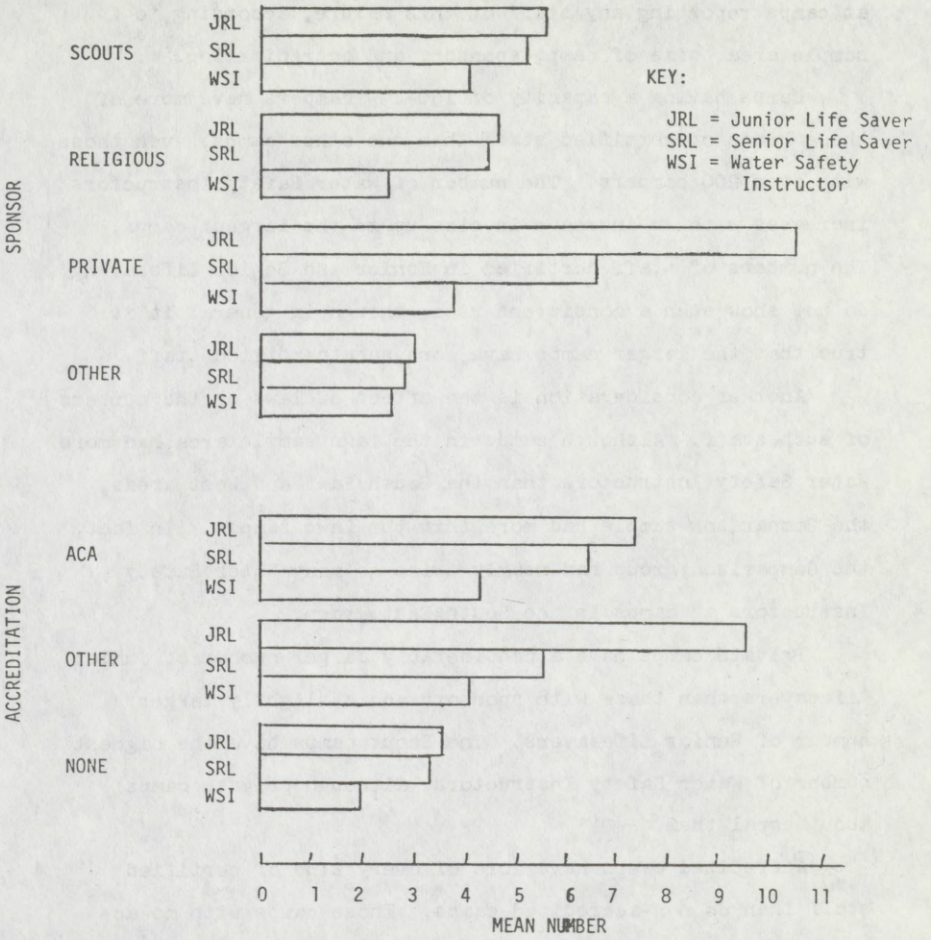

Figure 22. Mean number of camp staff certified in Junior and Senior lifesaving and as Water Safety Instructors for camps reporting any such staff.

at camps reporting any staff of this nature, according to sample area, size of camp, sponsor, and accreditation.

Camps having a capacity of 150-199 campers have more of these kinds of certified staff than the other camps, even those with over 200 campers. The number of Water Safety Instructors increases with an increase in size up to the largest camps. The numbers of staff certified in Junior and Senior Lifesaving do not show such a consistent rise, though in general it is true that the larger camps have more such certified staff.

Another consideration is the effect of laws on the numbers of such staff. Although camps in the Laws sample area had more Water Safety Instructors than the South/East and West areas, the Comparison sample had more than the Laws sample. In fact, the Comparison group had nearly twice as many Water Safety Instructors as camps in the South/East group.

Private camps have a considerably larger number of Junior Lifesavers than those with sponsors and a slightly larger number of Senior Lifesavers. The Scout camps have the highest number of Water Safety Instructors, although private camps about equal them.

Accredited camps have more of every kind of certified staff than do non-accredited camps. Those camps with no accreditation have roughly half the mean number of the accredited camps in all staff categories.

Boating instruction was offered by 63% of the camps. As camps increased in size, there were more reports of boating instruction, up to a camp size of 200. The largest camps

showed a slightly smaller percentage of instruction (66%) than the camps in the 150-199 category (73%). Twice as many accredited camps offered instruction as those not accredited.

The Scouting camps generally taught boating (93%) and 70% of the private camps did also. Only half of the religious camps reported instruction. An area comparison showed 52% of the South/East and West camps had instruction and that the Comparison group percentage exceeded the Laws group (80% to 70%).

The camp boating instructors generally had some form of training; however, 10% of the staff were trained on the job. Almost a quarter had completed the Red Cross small craft course and 16% were Water Safety Instructors, Senior Lifesavers, or Lifeguards. Over half (53%) had had "previous experience" of an unspecified nature.

Injuries

Injury report frequency. Camp personnel were requested to complete a report on all injuries which they treated. Some camps did exactly this; others, however, balked at completing forms on every minor scratch and scrape. Usually such camps submitted forms on "significant" injuries. As would be expected, the definition of "significant" varied from one camp to another. There is little doubt that injuries requiring the attention of a physician or outside professional procedures such as x-rays had forms submitted. A severe laceration or bruise which did not require sutures or other professional help outside that available at the camp might be submitted on

a form by one camp and not submitted by another. Much depended on the workload, the number and types of health care personnel, and their cooperativeness with the study.

Of course, there were other factors that lowered the number of forms submitted by one camp compared to another. Perhaps most notable were those camps operated by the Boy Scouts of America. These camps are "unit centered." Individual Boy Scout troops schedule periods of time in the camp and plan much of their own programs. Frequently they will also handle any minor first aid case solely within the unit. Such cases would not, of course, come to the attention of health personnel completing injury forms for this study and hence the circumstances surrounding the injury would be unknown. In other camps, however, the health personnel would handle every case no matter how minor. In such camps, injury forms might be completed for many cases that, had they occurred in Boy Scout camps, would not be reported because they would never have come to the attention of the person responsible for completing such forms.

The effect of such procedures is two-fold:

1. Injury rates in the total sample are lower than would be expected had all camps consistently reported every injury no matter how minor.

2. Interpreting differences in rates found in comparing one subsample to another must be tempered with the knowledge that such differences may reflect differences in reporting rather than differences in the incidence of injury.

Rates have been computed as the number of cases per 1,000 camper days of exposure. The rate, therefore, reflects

approximately the number of injuries that the health personnel in a camp of the median size (165) in this study would see in a session of six days or the number that would be seen in one week in a camp with 150 campers.

Figure 23 shows that there are approximately 5 to 6 injuries per 1,000 camper days in each of the four areas and in the total sample. These figures are based on 4,150 injury reports in nearly three quarter million camper days. The lower rate for the South and East camps highlight the caution with which these figures must be treated. Several camps in this cluster apparently reported only the most serious injuries. Figure 24 shows the rates for different groupings of camp sponsors. Although the grouping with Boy Scout and Girl Scout camps is lower than the other groupings, the possible reasons for this in the mechanics of reporting have been discussed above. Considering the very wide differences in the manner in which camps handled the reporting task, the differences in rates among these groupings of camps do not seem to indicate any reason to suspect that one type of camp sponsorship is associated with more injuries than another.

Severity. The 4,150 injuries which were reported include a wide variety of severity. Many required nothing more than a band aid and a few required no treatment except perhaps a washing or application of heat. While such injuries may be painful to the injured person when they occur and cause him some temporary discomfort, they are hardly a threat to the individual's health except in the most exceptional kinds of

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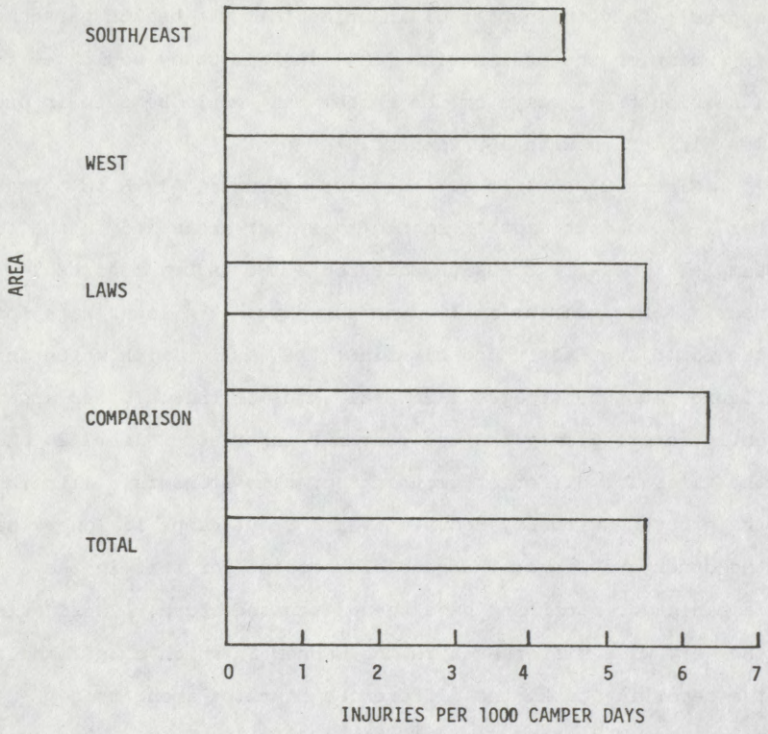

Figure 23. Camper injury frequency rates in each of four areas of the country.

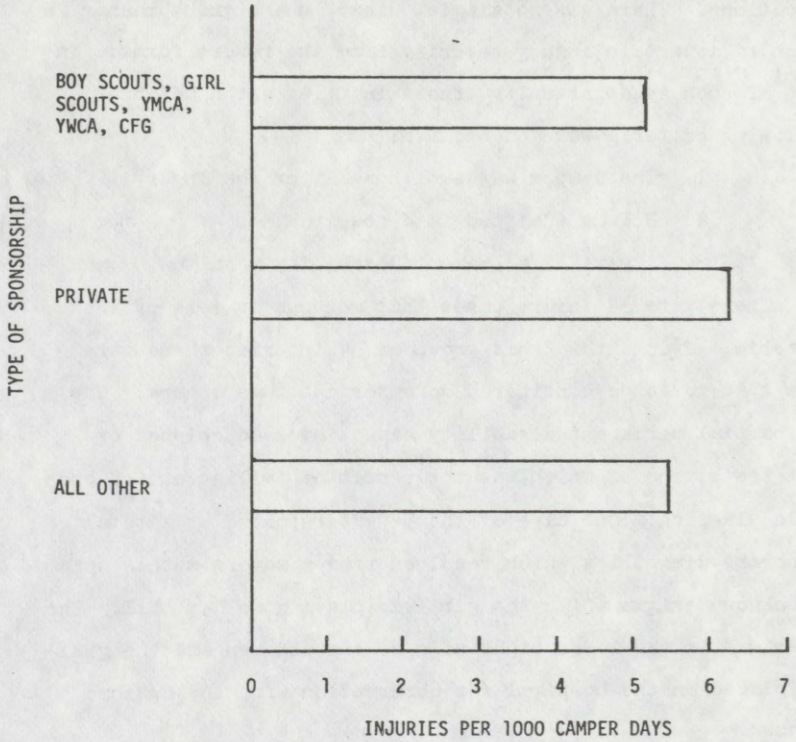

Figure 24. Camper injury frequency rates for each of three groupings of types of sponsorship.

situations. There was no single, clear, unambiguous manner in which to ascertain injury severity from the report forms. In lieu of such an opportunity, those injuries which met the following criteria were identified:

1. The camper was sent home after the injury.
2. He was admitted to a hospital.
3. A partial permanent disability resulted.

There were 54 injury cases that met one or more of these criteria. Even within this group of 54 injuries there were some that could be considered more serious than others. The two partial permanent disability cases involved chipped or lost teeth, one of which was the result of falling out of bed while sleeping. One case of the 54 was reported as a total temporary disability which resulted from a severe muscle spasm of unknown origin while the girl was playing volley ball. The spasm was in the lower right side of the abdomen and the girl was placed in the hospital for observation with the outcome unknown.

There were 29 cases involving something as serious as a fracture or concussion. The remainder involved sprains, lacerations (some requiring sutures), bruises, abrasions and so forth that resulted in the camper going home. Four of the 29 more serious injuries resulted from falls from horses; three of the less serious injuries resulted from a fall from a horse and at least one could easily have been more serious than it was. A 17 year old female camper who had never ridden before, fell from a horse, caught her foot in the stirrup and was dragged a short distance suffering multiple bruises and abrasions.

When one considers only these more serious cases, the injury frequency rate drops from 5 or 6 per 1,000 camper days to less than 1 per 10,000 camper days (.72). It may be helpful to understand this rate by looking at it in terms of the serious injuries that might occur in various hypothetical situations.

1. In a group of 10 camps having 150 campers and seasons of 10 weeks, 7 of them would experience an injury with the seriousness of a fracture or severe laceration.

2. Over a period of 10 years, a camp of 150 campers with a 10 week season would experience an injury of the more severe kind in seven of the years.

3. If the camp's season were only 5 weeks long (which was apparently a more common season length than 10 weeks), then it would take 20 years to experience 7 injuries of the seriousness found in this study.

Such overall statistics are not of much meaning if there is a camp which, through lack of proper supervision, poor facilities or lack of appropriate protective gear or safety equipment, is providing a dangerous situation for the campers.

Types of incident. By far the single major incident resulting in injury was falls, constituting one-quarter of the total incidents as seen in Table 8. While falls constituted 23% of the "not serious" injuries, they were involved in over half of the serious injuries. Furthermore, falls on the same level outnumbered those from an elevation, but falls from an elevation constituted 40% of the serious injuries, while they constituted only 8% of all injuries in which an incident was reported.

Table 8

Type of Incident Causing Injury[a]

Type of Incident	Severity of Injury		Total	
	Serious (%)	Not Serious (%)	%	Number
Fall from same level	13 } 53	15 } 23	15 } 24	499
Fall from elevation	40 }	8 }	9 }	282
Collision with object	12	16	16	525
Cutting	--	14	14	457
Struck by object	17	10	11	347
Abrasion burns, blisters	--	5	5	164
Splinter	--	5	5	159
Collision with person	6	4	4	117
Bee sting/insect bite	--	3	3	109
Struck by person	4	3	3	102
Stepped on nail, debris	--	3	3	93
Burns from flame or hot object	--	3	3	85
Twisted ankle, knee	2	2	2	56
Misc. animal bites	2	2	1	47
Sunburn	--	1	1	44
Pulled muscle, cramps	2	1	1	42
Horse kicked or stepped on	2	1	1	42
Substance in eye	--	1	1	42
Bicycle - Fall or collision	--	1	1	18
Misc. other	--	1	2	71
Total %	100	100	101	
Number	52	3249		3301

[a]Percentages are based only on those cases in which an incident was reported. Frequently, and especially for very minor injuries, camps did not complete an entire injury report form and the incident is therefore unknown.

Falls were followed in frequency of occurrence by "collisions with objects" and then by "cutting" incidents.[1] The former represented 12% of the serious injuries and 16% of the other injuries. However, for cutting incidents there were no serious injuries--all were of the "not serious" nature. Similarly there were no serious injuries among the following:

164 Abrasion burns or blisters
159 Splinters
109 Bee stings or insect bites
93 Cases of stepping on nails or sharp rocks
85 Burns from flame or hot object
44 Sunburn cases
42 Cases of something in the eye
18 Bicycle falls or collisions
15 Bow or arrow incidents
10 Boat or canoe overturns

Although there were 10 cases of snake bite, only one was serious. A 15 year old girl was bitten by a copperhead as she stepped out of her tent late at night. The other snake bite incidents involved nonpoisonous snakes usually being kept as pets or in attempts to catch them.

Many of the incidents in which campers stepped on nails, debris, or sharp rocks resulted from not wearing shoes or from improper footwear such as sandals while walking or hiking over

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[1] The reader should not confuse "cuts" as an incident (such as might occur in carving wood with a knife) and "cuts" as injuries, which might occur from many other kinds of incidents in addition to cutting incidents.

rough ground. Similarly, improper footwear accounted for many of the cases of blisters--ill fitted shoes, lack of socks, wet tennis shoes and sandals in inappropriate situations.

Horses accounted for 12 animal bites and there were eight cases of human bites, usually sustained in fights or emotional outbursts. Horses also kicked or stepped on 42 campers but only one of these injuries could be considered serious. These incidents combined with the many falls from horses would appear to indicate a need for extra care when relatively inexperienced campers are too near horses.

Activity at time of incident. Walking or running was found to be the activity at the time of accident in 29% of the injuries and thus is the single most frequent activity resulting in an injury as seen in Table 9. Competitive sports and horseplay and fighting followed in frequency with about half of those for walking and running. However, in the group of serious injuries, the most frequent activity was reported to be horseplay and fighting with just over one-fifth of the serious injuries occurring in this activity. This was about equal to walking and running in frequency. The miscellaneous general activities that accompanied 12% of the serious injuries and 8% of all injuries included normal activities encountered in routine daily tasks. For example, there were several injuries (including three classed as "serious") caused by falling out of bed while sleeping. Other routine tasks which resulted in injuries and are included in the category are eating, sitting, standing in line, walking through doors and so forth.

Table 9

Activity at Time of Incident Resulting in Injury[a]

Activity	Seriousness of Injury		Total	
	Serious %	Not Serious %	%	N
Walking/running	19	29	29	861
Competitive sports	13	14	14	427
Horseplay/fighting	21	12	12	352
Misc. general activity	12	8	8	243
Horseback riding	13	7	7	201
Swimming	6	7	7	195
Hiking/climbing	6	4	4	120
Misc. recreational activity	2	3	3	81
Boating/canoeing/sailing	-	3	3	82
Arts and crafts	-	3	3	73
Playing/playground equipment	8	2	2	71
Cooking	-	2	2	71
Games	-	2	2	61
Whittling/cutting	-	2	2	51
Work activity	-	1	1	40
Archery/riflery	-	1	1	23
Total %	100	100	100	
Total Number	52	2900		2952

[a]Percentages are based only on those cases in which an activity was reported. Frequently, and especially for very minor injuries, camps did not complete an entire injury report form and the activity is therefore unknown.

Horseback riding was the activity in 7% of all injuries, but in 13% of the serious injuries. All of these serious injuries resulted from falls from a horse.

Other injury circumstances. In addition to the incident description and the activity at the time of the injury, other circumstances surrounding the injury and characteristics of the injured may be summarized as follows:[1]

54% were to males
46% were to females

16% were children under 10 years old

14% occurred between midnight and 10 A.M.
69% occurred between 10 A.M. and 8 P.M.
16% occurred between 8 P.M. and midnight

79% were treated within an hour
1% took 25 to 48 hours before treatment.

15% of the injuries occurred with safety equipment available for use
71% of these reported the equipment was being properly used at the time of injury

13% of the injuries occurred when the camper was violating a rule

6% of the injuries resulted in a change in the camp

38% of the injuries were preventable in the estimate of the reporter

Some of these points can be further elaborated. For example, delays in time between the injury and the treatment were frequently the result of a camper failing to report an injury until he found it was still disturbing him some hours later or he suffered degraded or unimproved performance the following day.

[1]These descriptions are based on a total of 4365 injury reports submitted and not only on those that could be related to an exposure rate as in the previous sections.

The question of whether safety equipment was available for the campers use was quite ambiguous in many situations. Injuries in competitive sports may have occurred in spite of the campers wearing much protective gear because the nature of the injury was not compatible with the equipment available.

With regard to the rules which campers violated, the following is a listing of those mentioned:

19% improper footwear
16% running
13% horseplay
11% fighting
9% miscellaneous activity rules
8% throwing or swinging objects
7% camper in an off-limits area
5% improper use of sporting equipment
3% playing with fire, matches, explosive objects
2% improper supervision
1% pushing
1% playing with knives
1% curfew violation
1% no proper precautions for personal protection (suntan lotion)
1% other rules

In regard to the changes in camp environment and operation, usually an injury agent was removed or corrected in some fashion or rules of behavior or techniques were stressed to campers or to counselors. In rank order the changes were:

37% miscellaneous repairs of camp facilities

19% stricter enforcement of rules or restressing rule to campers

9% more supervisors or increased supervisory activity

8% more instruction of campers or making campers aware of the rule

6% miscellaneous rules added

6% miscellaneous rules not elsewhere classifiable

5% reeducation of couselors

3% restrict camper to cabin or from the activity

2% add safety items (such as railings) to camp facilities

2% wear appropriate clothing, sun protection, shoes

2% restricted campers from certain camp areas

2% cleaned the swimming area

Although 38% of the injuries were rated as being preventable, the suggested preventative was, in many cases, merely the suggestion that more care be exercised or cease the activity. Other suggestions were more specific as seen in the following list.

22% be more careful

13% wear shoes or other proper footwear

7% coach, teach, or require proper techniques in the activity

6% no horseplay

6% no running; walk only

6% closer supervision of campers

6% campers should obey rules; behave

6% miscellaneous other

5% wear protective gear

5% improve equipment or facility

4% do not play the game

3% keep area clear; clean up

3% restrict activity, device; add rules

3% stay in area approved or appropriate to activity

2% enforce rules

1% better leadership.

Accident description. Space was provided on the injury report form to describe the accident. A simple categorization of the main feature of the accident was then applied in an attempt to understand the situation. Sometimes the main feature was an activity (such as hiking), sometimes an injury agent (for example rocks), and sometimes an incident (tripping). In a sense it is partially repetitious of other information in the form, but it also adds much information. The following list shows the rank order of the accident descriptions. Percentages are based on 4365 injury report forms submitted, but many reports did not provide a description that could be coded and hence these percentages are low:

10% tripped, slipped, stubbed

9% in a game or contest

7% horseplay or fight

5% in some normal activity such as eating, going through doors

4% falls (with no details on why)

4% involved a horse

3% using a cutting device

3% improper footwear

3% by an insect or animal

3% while swimming or in a swimming game

3% handling a device in an activity (such as oars in rowing)

2% by not looking; ran into something

2% hiking or walking (blisters)

2% some camp activity such as cookouts or campfires

1% falls out of bed

1% by thrown rocks or stones

1% stepped on something

1% by something dropped or spilled

1% sunburn

1% diving

1% miscellaneous individual sport or activity

In 2% the source was unknown. This involved such things as small cuts or scratches discovered sometime after they are incurred and therefore the injury agent and other circumstances are unknown.

Types of injuries. The largest single type of injury was lacerations or cuts to the fingers of which there were 229 cases in 4365 reports. As in previous research, the largest number (71%) of injuries involved the extremities; this was matched by skin injuries (burns, cuts, bruises, abrasions, punctures) which constituted 69% of the reports. Head injuries constituted 16%. There were 54 fractures reported, most of which were to the arms, wrist, or hand; sprains and dislocations accounted for 13% of the reports.

Treatment, disposition, and disability. The minor nature of the mass of injuries reported is revealed in the treatment accorded them. Treatment in the infirmary or first aid station was accorded 89% of the injuries; 4% more required no treatment. Of all the reports, 10% were treated in a hospital emergency room or physician's office. Only 18 cases were admitted to a hospital. Only 1% of the cases were sent home, 14% returned to restricted activity, and 84% returned to full camp activity. Ninety-four percent suffered no disability and 5% suffered a partial temporary disability. Those cases reporting partial permanent disabilities were usually chipped or lost teeth and one case of total temporary disability involved a case of being knocked unconscious.

The mass of injuries were minor in nature and the camper suffered little or no debilitating effect afterward.

Illnesses

Illness report frequency rate. Completion of illness report forms by camp personnel encountered the same problems as previously discussed with injury forms. Many campers reported to the camp infirmary to obtain remedies that, had they been at home, would not have been noticed. These include aspirin for minor headaches, antacids for minor stomach distress, and topical applications to relieve the discomfort of bites, sunburn or minor skin irritations. Some camps reported all such cases, others did not. (Hence, care should be exercised in making any comparisons of subsamples.) In an effort

to reduce the influence of very minor cases, the following were not considered in calculating the rates:

1. Those in which the diagnosis was "Dental" (usually toothaches).
2. Diagnoses of insect bites which did not have an associated allergic reaction listed (most frequently these were mosquito bites).
3. Diagnoses of "vague conditions" when there was no other associated diagnosis and no treatment was given.
4. Diagnoses of "blisters" with no other indicators of more complicated problems.

Figure 25 shows the frequency rates for illness reports for each of the four areas and for the total sample. Overall, it would appear that these were between 9 and 10 per 1,000 camper days. The differences in rates for the four areas should not be viewed as reflecting any real differences in the amount of illness in camps in those areas since it is more likely they reflect differences in the amount of reporting done. For example, at least two of five clusters of camps in the South and East area had many camps supplying only the more serious illnesses. Only five camps in this area supplied more than 100 forms where there were more than twice that number of camps in the Comparison group supplying that information. One camp alone in the Comparison group supplied nearly 700 illness incidents, whereas all camps combined in the South and East cluster supplied only a bit over 800 forms. While there were differences between these two areas in camp size and lengths of period covered, resulting in about twice

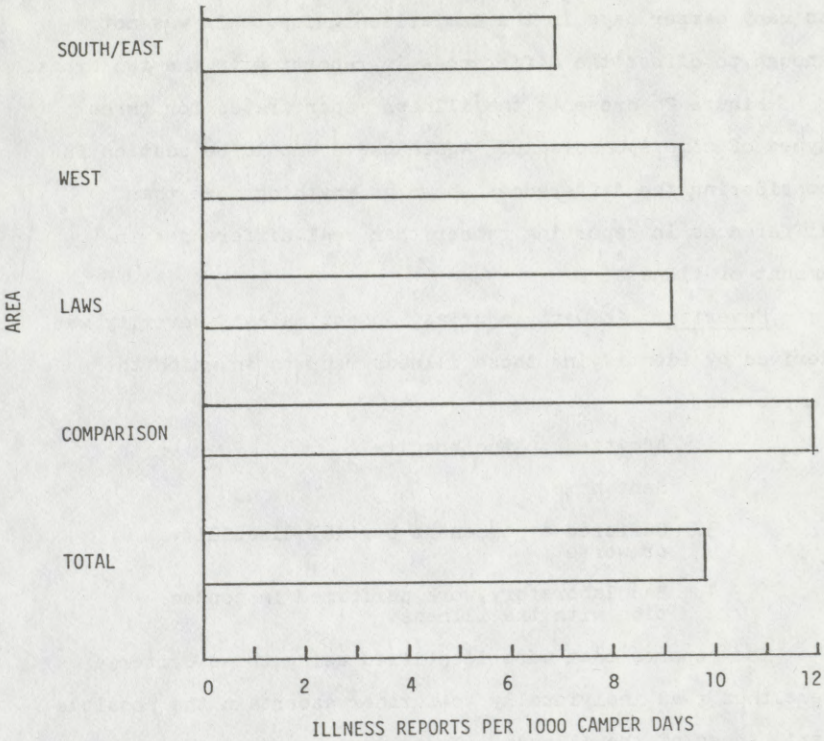

Figure 25. Camper illness report frequency rates in each of four areas of the country.

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as many camper days in the Comparison group, this was not enough to offset the differences in reporting in the two areas.

Figure 26 presents the illness report rates for three types of camp sponsorship. Again there should be caution in considering the differences shown as anything more than differences in reporting rather than real differences in amount of illness.

Severity. As with injuries, an estimate of severity was derived by identifying those illness reports in which the camper was:

1. Admitted to the hospital
2. Sent home
3. Suffered a permanent partial disability or worse
4. Had laboratory work performed in connection with the illness.

The reports that were identified using these criteria were then read individually to further ascertain the possible seriousness of the illness. There were 16 cases that, while they met the above criteria, did not appear to be serious. These included children sent home for routine homesickness and those who went home at the child's or the parent's initiative, and also cases in which laboratory tests were made as a precautionary measure but were found to be negative and the illness in light of this was not serious. Of the original 7323 illness reports, then, there were 216 that resulted in hospitalization, going home, or laboratory tests. Most of these involved some form of upper respiratory infection or

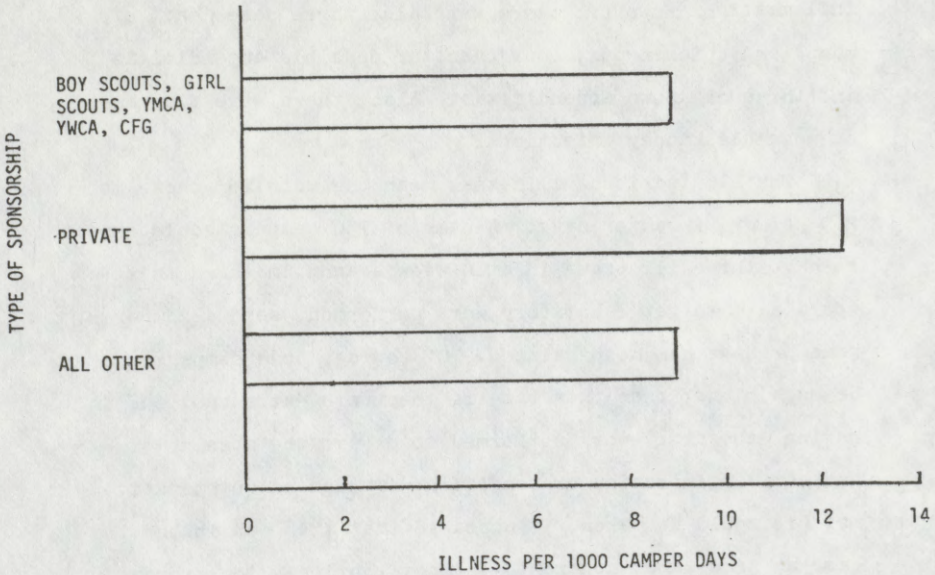

Figure 26. Camper illness report frequency rates for each of three groupings of types of sponsorship.

inflammation. However, there were also three cases each of mumps and chicken pox, four cases of possible appendicitis and three of known appendicitis. Also, there were two cases of possible kidney infections.

The 216 "serious" illnesses mean the rate for these is 2.9 per 10,000 camper days. A camp of 150 campers could expect to have three illnesses in a 10 week season in which they would have to get laboratory work performed, send a camper home or have him hospitalized. Of course, some camps might be much higher than this rate if they were extra cautious in having laboratory work performed to assure the absence of any serious infection or condition. Though no quantitative measure could be taken, it appeared that this was indeed the case as some camps apparently almost routinely took throat cultures.

Major incidents. Field representatives were instructed to be alert for any indication of evidences of contagion or illnesses of many campers from a common source, or other events that might affect the illness reporting. Only two such instances were clearly identified though there were indications in other camps that colds or other upper respiratory infections were apparently afflicting several persons who lived or played together, such as in a cabin or tent. The two instances reported were:

1. At a nonprofit, accredited camp of 180 capacity, there arose in a four day period an outbreak of gastrointestinal virus afflicting 65 campers. Symptoms were high temperature, nausea and vomiting. On the fourth day the camp had

decided to curtail swimming for everyone. The following day, on advice of the State health officer, the camp was evacuated for disinfecting and airing.

2. In a two week period, an outbreak of gastroenteritis affected about 57 people (including about 15 counselors) at a nonprofit, accredited camp of 135 capacity. Initially the cause was sought in the kitchen, but was traced to a clogged chlorinator in the water supply system. Bacteriological tests showed heavy coliform. Cleaning the chlorinator so that chlorination was effective eliminated the problem.

Environmental Surveys conducted in these camps revealed nothing of a nature that would indicate a problem. In the case of the clogged chlorinator, the Sanitarian made his survey about two weeks after the problem had been solved and reported the well to be in an unsatisfactory location, but that otherwise the water supply was adequate. At that time the Camp Director was considering a new well location to avoid the possibility of a repetition of the problem. The Field Representative reported the camp to be a clean, excellently run camp with conscientious personnel and strict health rules about such items as windows and bunk arrangement. He further indicated it was an unlikely place for the outbreak to occur.

In a different vein--but the sort of event that can affect reporting--is one nurse's analysis of the reason for some of the earaches she was reporting. Word had passed around camp that children with earaches would be excused from swimming instruction. She suspected that most of the earaches she was reporting were children who did not want to swim.

Circumstances of the illness reports. The sex of campers examined for illnesses was recorded on 5,492 illness forms and on the basis of that number, it was determined that almost as many male campers (49%) as females (51%) had illnesses. Campers over 10 years of age were the subjects of 84% of the reports.

In 79% of the cases (based on 8,260 total) the sick campers first visited a nurse for treatment. Other staff seen were:

9% medical doctor
3% counselor
2% first aider
1% health director

The treatment facility for this first visit was the Camp Infirmary for 92% of the cases; only 1% went to a hospital initially.

Most of the first visits occurred between 10 A.M. and 7 P.M. (54%). Early morning visits (between 1 A.M. and 9 A.M.) were recorded for 30% of the reports and 16% were after 8 P.M.

For 90% of the cases, there was less than an hour between the time medical attention was requested and an examination. By the time the camper asked for an examination, symptoms had been experienced for:

31% less than 1 hour
39% 1 - 6 hours
21% 7 - 24 hours
4% 25 - 48 hours

4% more than 48 hours

1% unknown time

Past medical history. In examining the past medical histories of the sick campers, it was found that 16% were known to have had a pre-existing illness or stress condition. Psychological or personal adjustment problems accounted for 45% of the total and ranged from simple homesickness to worry concerning such matters as divorced parents. Inflammatory or infectious diseases comprised 18%, and personal or environmental stress, including such factors as hot or cold weather, and over-exertion, accounted for 13%.

Other pre-existing illnesses or stresses included:

7% allergy

6% miscellaneous (retardation, epilepsy, overweight)

5% mechanical

4% cardio-respiratory conditions

1% gastrointestinal conditions

1% endocrinologic (thyroid)

5% musculo-skeletal conditions

There were a number of chronic medical conditions listed for the 10% of sick campers reporting them. The order was:

33% allergic

20% cardio-respiratory

15% endocrinologic

13% inflammatory or infectious

13% miscellaneous

3% mechanical

2% gastrointestinal

1% musculo-skeletal

1% psychiatric

Types of illness. The most common illness affecting campers was an upper respiratory infection or cold, and this was the diagnosis for 30% of the illness reports. Other types of problems included:

8% earache or infection

6% gastroenteritis

4% poison oak or ivy

4% insect bite

3% rash, hives

3% psychological disorders (including homesickness)

1% strep throat

1% conjunctivitis

1% dental

1% athletes' foot

1% asthma

1% hayfever

9% miscellaneous

The illness remained undiagnosed in 2% of the cases and a quarter of the patients suffered from vague conditions such as headache, fatigue, or abdominal pain.

Treatment. The camp infirmary or first aid station treated 94% of the illnesses. For 2%, no treatment was required, and 5% were treated in hospitals or physicians' offices.

The types of treatment included:

23% topical antiseptic - antibiotic

20% anti-inflammatory/analgesic

13% supportive (bed rest, physiotherapy)

11% gastrointestinal

9% antihistaminic decongestant

5% antibiotic

1% bronchodilators

Laboratory work was done for only 3% of the illnesses.

Only 3% of the campers had to be sent home because of illness. Restricted activity was ordered for 20% while 75% were able to return to full activity. These percentages are based on the 4,099 forms on which this information was noted. No information or disposition was provided on half of the forms and it is quite possible that most of these were for minor illnesses and hence indicated return to normal activity. Thus, 75% is probably an underestimation. It was not considered necessary to notify parents or guardians for 89% of the illnesses. It is obvious that most of the illnesses reported to the infirmary are minor and require limited treatment and restriction.

Health rules and illness. It was found that the illnesses were related to rule violations in only 1% of the cases. These violations included:

28% not using ear drops after swimming

14% not avoiding poison ivy

14% not obeying curfew

10% not reporting illnesses immediately

10% withholding or giving wrong information on the medical form

7% not wearing shoes

7% indulging in horseplay

3% not keeping head-to-foot bunk arrangement

3% not taking soap shower after hiking

In 3% of the cases, camp environments or operations were changed following a particular illness. The changes made were reported as:

20% rest periods increased

16% supervision or further training in good hygiene

15% bunks rearranged

12% poison ivy destroyed

11% ill campers isolated

6% activities, attention increased

6% kitchen hygiene improved

6% miscellaneous other (better food, purified water, etc.)

5% hives or insect sprayed or removed

5% pool checked, chlorine increased

5% alcohol or ear drops used in ears after swimming

5% increased personal precautions for sensitive campers

3% cleaning, disinfecting

2% gargling for all campers

1% salt tablets given during heat spell

Environmental Survey

Water supply. It was found that most youth camps do not use a municipal water supply. Of those surveyed, 88% were supplied by some other source. For a private source, 89% used wells. Figure 27 shows that twice as many camps in the South/East group had a municipal supply as those in the West group, and that more Law group camps than Comparison camps were municipally supplied.

Over half the camps with private water supply did not treat the water in any way as shown in Figure 28. More Comparison camps treated their water than camps in the Laws group. Chlorination was used by 27% of the camps and of those employing this method, 38% kept daily logs of the chlorine residuals. Very few camps (6) used gas chlorination.

The private water sources were found to be in an unsatisfactory location in 8 camps, and poorly protected in 21% of those inspected. Over a quarter of the West group had a poorly protected supply. None of the camps in the Comparison group had supply systems that were considered deficient in any way except for three camps with reported unsatisfactory source locations.

Table 10 shows that only 4% of the camps had no check on the bacterial content of their water supply. One analysis a year was reported by 30% of the camps and a fifth had 2 to 5 checks a year.

Sewage disposal. Most of the camps (88%) did not use a municipal system for disposing of their sewage, as shown in

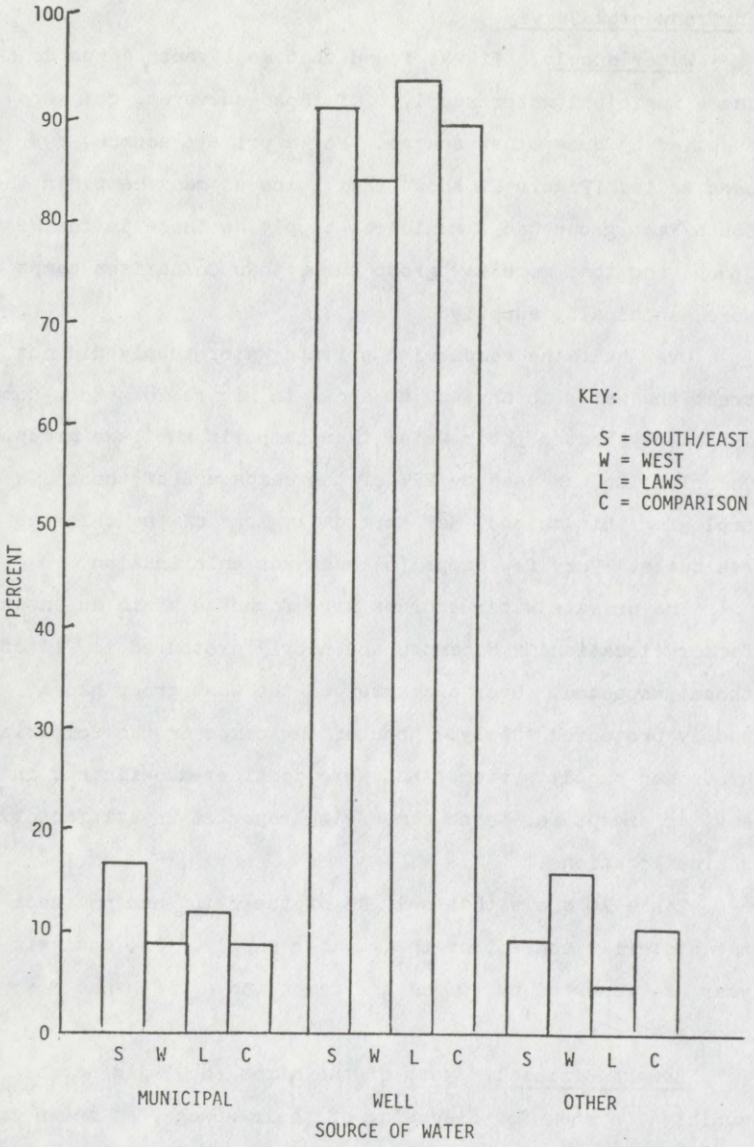

Figure 27. Percentage of camps in each area with municipal, well, or other source of water.

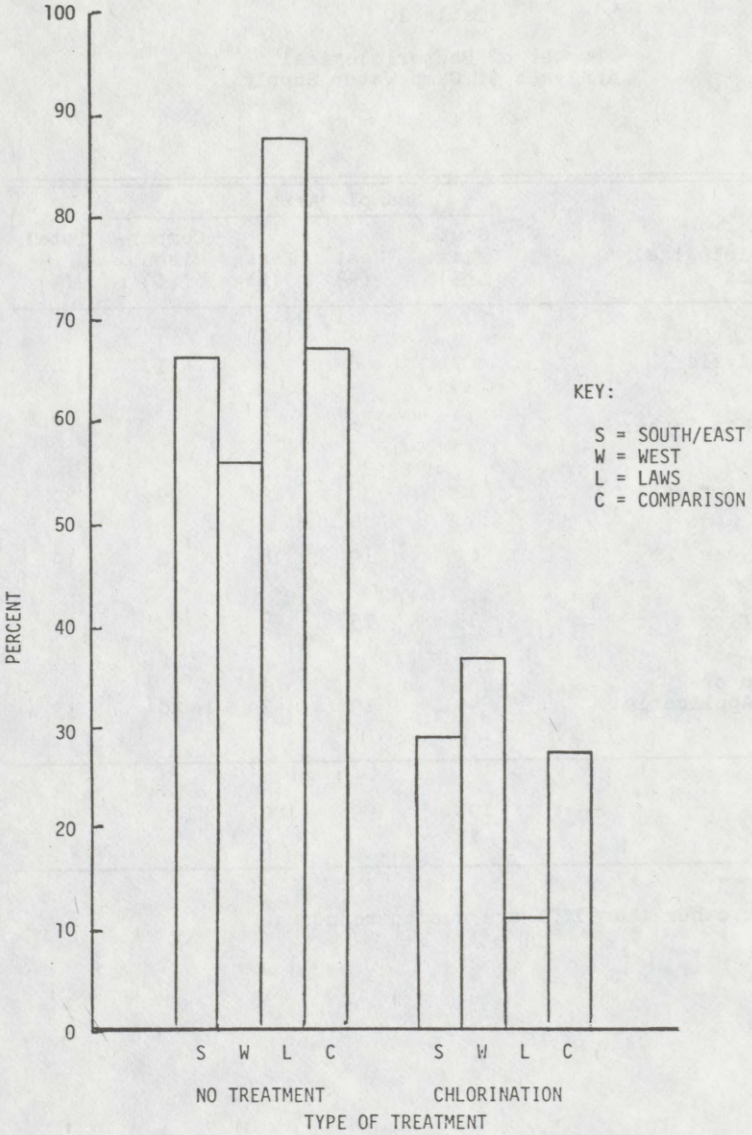

Figure 28. Percentage of camps with private sources of water which do not treat their water and which treat it by chlorination.

Table 10

Number of Bacteriological
Analyses of Camp Water Supply

Number of bacteriological analyses	Sample Area				Total (%)
	South /East (%)	West (%)	Laws (%)	Compar- ison (%)	
No analysis	7	6	-	1	4
Less than 1/year	-	2	2	-	1
1/year (or season)	12	38	29	39	30
2 - 5/year	22	19	18	18	19
6+/year	15	15	8	12	12
Unknown or Not Applicable	44	19	43	30	33
Total[a]	100	99	100	100	99

[a]Totals other than 100% are due to rounding.

Figure 29. More South/East camps than those in the West (12% vs. 4%) and more Law camps than Comparison (8% vs. 2%) were connected to a municipal system. For those using a private disposal system, 87% had septic tanks. The capacity of the tanks was larger for the Laws camps (median 5500 gallons) than for the Comparison group (median just under 2000 gallons). Almost a quarter of the camps used pit privies to some extent; 30% of the West group and 29% of the Comparison had pit privies. Since many of the camps had septic tanks, it was not surprising that 83% reported no further treatment of their sewage.

Only 5% of the camps discharged their sewage within a mile of their water source. Offensive odors around privies and sewage treatment areas were noted in 15% of the West camps, twice the average for the camp total. Insects and rodents around these areas also were observed more often in the West, although there were only nine camps where they were noted. Of the camp total, 7% were found to have sewage on the ground near septic tanks. Excessive weeds in the treatment area were noted more often for the Laws camps (10% vs. 0-5% for the other groups).

Solid waste disposal. Off-site disposal for a portion of the camps' solid wastes was reported for 86% of the camps as shown in Table 11. Only 12% of the Laws group disposed of any waste on site contrasted to 22% of the Comparison group, 42% of the South/East group and 31% of the camps in the West. Methods of on-site disposal were often used in combination,

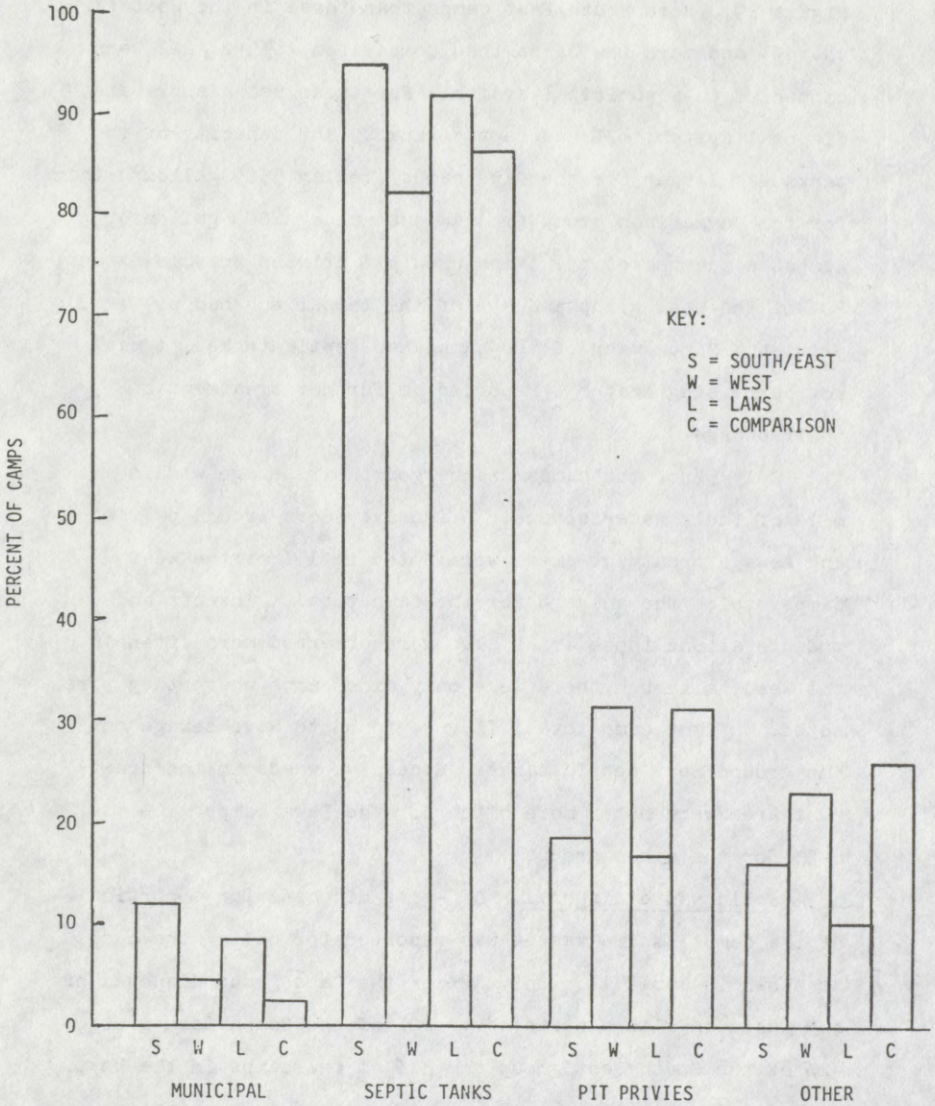

Figure 29. Percentage of camps with different methods of sewage disposal.

Table 11

Percentage of Camps Using
Each of Several Methods
of Solid Waste Disposal

Solid Waste Disposal	Sample Area				Total (%)
	South /East (%)	West (%)	Laws (%)	Compar- ison (%)	
Off-site	78	83	92	90	86
Sanitary landfill	18	27	--	27	20
Open dump	53	40	33	9	37
Incinerator	--	40	33	27	22
Food waste grinder	--	13	17	9	8
Open burning	18	7	--	18	12
Compost	--	--	--	18	4
Misc. other	6	20	33	--	12
No answer or not applicable	12	--	--	9	6

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the open dump being one common solution (37%). However, only one camp in the Comparison group used a dump. One fifth of the camps with on-site disposal used sanitary landfill.

Insects and rodents were observed around the disposal areas in more West and South/East camps than Laws or Comparison camps, but the first two groups had a higher frequency of on-site disposal and perhaps this contributed to the greater infestation rate. However, only 11 camps were observed to have this problem.

Trash was stored in covered metal containers by 50% of the camps. None of the Comparison group used uncovered containers, although 10% of the Laws group, 13% of the West, and 20% of the South/East camps stored trash in that fashion. Trash collections for off-site disposal were made more than twice a week for 48% of the camps; 31% had twice a week collections and only 9%, once a week, as illustrated by Figure 30.

Camp site. One problem in analyzing the data on camp site and facilities is that the Western group of camps were inspected for defects more frequently than the other groups. There were consistently fewer Western camps for which "no answer" or "not inspected" were checked. Therefore, the percentages listed in these sections are based on the number of camps inspected rather than the total number of camps in each group.

Very few camps were observed to have site defects of any sort. Only 5 camps had drainage problems. Proximity to a

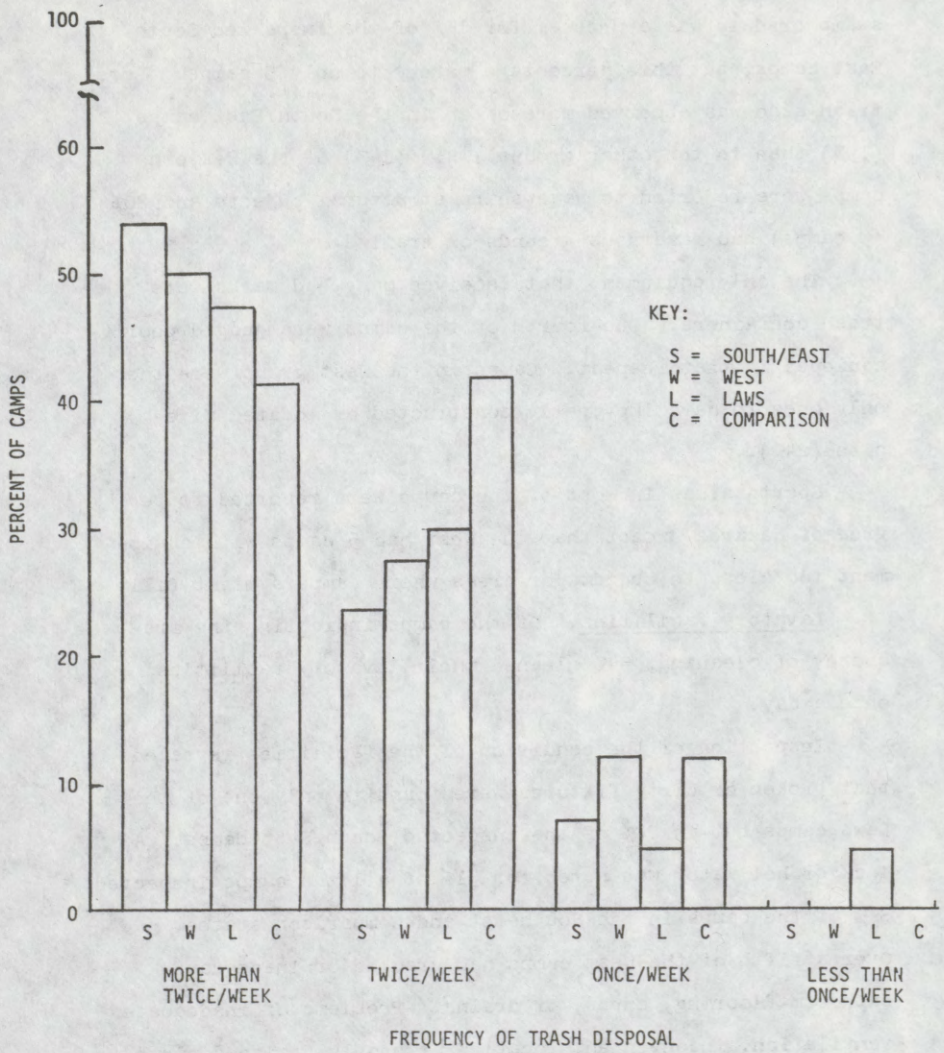

Figure 30. Frequency of trash disposal in each of the sample areas.

swamp or dump was a problem for 15% of the inspected South/East camps, but this percentage refers to only 5 camps. Loose trash also was observed more often in the South/East camps (19%) than in the other groups. Six (14%) of the Western camps were reported to have sharp structural objects and 20% (9 camps) had hazardous grounds or trails.

The only equipment that received many bad marks were trash containers. One-fourth of the camps were judged poorly equipped in that respect. Camps in the West group were the only ones to have improperly constructed or located fire pits (24%).

Sports areas in most of the camps were reported to be free of hazards except that the West had 5 camps with equipment too close to objects or areas where campers might fall.

Lavatory facilities. Of the camps indicating the frequency of cleaning, 94% cleaned their lavatory facilities once a day.

Inspection of the condition of the facilities revealed that broken or dirty fixtures were found in only one of the Laws camps but in 20% of the inspected South/East camps. A lack of hot water was noted for 31% of all the camps inspected, 37% of the camps in the Southeast and Comparison states. Over a fifth of the West camps had cracked or inadequate bathroom flooring, curbs, or drains. Problems of inadequate ventilation, inconvenient location or poorly designed plumbing were found in very few camps.

Sleeping facilities. Only five camps in the total sample were reported to have structurally unsafe buildings; three of those were in the West group. Space heaters were improperly used in 10 camps, four of them in the Laws group.

Broken beds and insects or rodent infestation were not problems found in many camps, and only 9 camps had unclean sleeping areas.

The most severe deficiency in camp sleeping facilities and in the kitchen and dining facilities as well, was the lack of a number of common fire protection items.

Table 12 shows that, of those camps inspected, 45% of the South/East group had only a single fire exit compared to 29% of the West, 17% of the Laws and 21% of the Comparison camps. Fire extinguishers were not available in the sleeping areas in 57% of the inspected camps, and in 68% of the South/East camps. Where extinguishers were found, they were out of-date in 12 instances.

Kitchen facility. Only eight camps had single fire exits for their kitchens, but 70% of the inspected camps did not mark the exits. The percentage of Comparison camps which did mark exits was twice that of the other groups. Fire extinguishers were present in all but 14% (19 camps) of the inspected kitchens. The Comparison group had only two camps with no extinguishers. A fifth of the camps which did have extinguishers had some which were out-of-date.

Only 13% of the inspected kitchens were generally unsanitary.

Table 12

Percentage of Inspected Camps
Having Fire Protection Deficiencies
in Camp Living Areas

Living Area and Deficiency	Sample Area				Total (%)
	South /East (%)	West (%)	Laws (%)	Compar- ison (%)	
SLEEPING AREAS					
One exit only	45	29	17	21	29
No fire extinguishers	68	56	56	47	57
KITCHEN AREAS					
One exit only	6	5	3	8	6
Unmarked exits	76	84	78	40	70
No fire extinguishers	21	11	19	6	14
DINING AREAS					
One exit only	6	2	4	6	4
Unmarked exits	69	88	68	42	67
No fire extinguishers	33	41	38	14	32

Over a quarter of the camps inspected did not have facilities for maintaining food at proper temperatures. However, only 3 Comparison camps had this deficiency. Poisons were stored improperly in 13% of the camps and 26% did not store utensils properly. The Comparison camps were found to be generally adequate in the latter respect.

A fifth of the inspected camps did not sanitize their tableware, and the dishwashing facilities were inadequate in 18%. Grease on food equipment was found for 14% of the camps. Garbage was not stored properly in over a quarter of the camps and rodent or insect infestation was not controlled in 20 camps (15% of those inspected).

Unscreened building openings were found in 19% of the camps but in only one Comparison camp. The floors were judged difficult to clean in the kitchens of 16% of the camps, and the walls and ceilings, in 26%

Dining facilities. Referring to Table 12, previously presented, the fire protection deficiencies in the dining area were the major problems. More than one fire exit for the dining room was provided by all but six camps. However, there were unmarked exits in 67% of the cases. Fire extinguishers were not available in 41% of the West camps inspected, and in 32% of the total camps. The Comparison group, however, had only five camps without extinguishers. In 13 camps, the extinguishers were out-of-date.

Only four camps had unsanitary dining facilities, all four in the West. Utensils were improperly stored

in 25% of the West camps and 21% of the South/East compared to 6% and 8% for the Laws and Comparison states.

Evidence of insects or rodents was found for 13 camps. Only two Comparison camp dining facilities had unscreened openings compared to 10 for the West. The floors were thought hard to clean for 12 camps and the walls and ceilings were difficult for almost a quarter of the sample inspected.

Swimming pools and bathing areas. Only 58 camps in the sample were checked for the adequacy of their logs of swimming water chlorine residual and degree of acidity (Ph). Of the inspected camps, 53% kept inadequate logs; 47% of the South/East camps, 84% West, 56% Laws, and 15% Comparison. Table 13 contains the major findings for this part of the survey. No bacteriological tests were taken in 42% of inspected camps, and percentages varied from 63% for the West group to 27% in the Comparison states.

The clarity of the water was judged insufficient for 28% of the inspected camps where the bottom of the pool or swimming area was not visible. Over twice as many Laws camps as Comparison camps had this defect. Only 21 camps were judged to have hazardous swimming areas; over half of that number were camps in the West.

Showers for swimmers were either inconvenient or absent in 53% of the inspected camps. Only 25% of the Comparison camps were deficient in this respect contrasted to 74% of the Laws camps. Half the camps did not have toilets convenient to the swimming area. Again, the Comparison camps rated considerably better than the other groups.

Table 13

Percentage of Camps Deficient in
Several Items of
Swimming Pool/Bathing Area Sanitation

Inspected Item	Sample Area				Total (%)
	South /East (%)	West (%)	Laws (%)	Compar- ison (%)	
No bacteriological tests	43	63	31	27	42
Inadequate log of chlorine residual and Ph	47	84	56	15	53
Bottom of swim area not visible	23	29	46	22	28
Hazardous deck/beach area	11	33	8	17	19
Showers inconvenient or absent	61	55	74	25	53
Toilets inconvenient or absent	59	46	74	24	50

Summary of the environmental survey. Most of the camps surveyed were found to be clean and relatively hazard-free. Although the camps in the four geographical areas differed on specific points, there was no clear evidence of regional superiority. It was apparent, however, that the inspected Laws camps did not offer any safer or more healthful camping environment than the Comparison group; in fact, the Comparison camps were judged better than the Laws camps in many respects.

The data suggest certain areas that possibly could be improved to maximize the safety of the camp environment. Chief among these is the improvement of fire protection. A very high percentage had no fire extinguishers in the sleeping areas or dining rooms, and 19 camps had none (or improper types) in the kitchens. Effective extinguishers should be available in all living areas. Fire exits should be clearly marked, something that was neglected in many camps.

There could be some improvement in facilities for maintaining food at proper temperatures, sanitizing and storing tableware, and dishwashing facilities.

PHASES:

II Contributions by National, state and local, public and private agencies

III Adequacy of state laws governing camp design and operation

IV Effectiveness of current enforcement procedures

PREPARED BY:

The National Recreation and Park Association

Under a subcontract with

Century Research Corporation

I. INTRODUCTION

The information in this report was provided by the National Recreation and Park Association, acting as a subcontractor for the Century Research Corporation for one phase of Contract HSM 99-73-37 (Investigation of Youth Camp Safety).

II. OBJECTIVES

The objectives of this phase of the Youth Camp Safety Project were:

1. to determine the contributions to youth camp safety being made by national, state and local, public and private agencies;

2. to ascertain the adequacy of state laws governing the various aspects of camp design and operation; and

3. to evaluate the effectiveness of current enforcement procedures.

III. METHOD

Several survey and visitation tasks were undertaken during the conduct of the Youth Camp Safety Project. These included: (a) a survey of national organizations, American Park and Recreation Society membership, and contacts in each of the 50 states (identified by project staff and NRPA Regional Directors); (b) visits to national organizations and state agencies by project staff; and (c) review of materials supplied by the Cordura Company regarding their assessment of youth camp safety laws. After material from these sources was received and organized, a 3-day review and evaluation meeting was held at the Association headquarters office in Arlington, Virginia. There, a panel of consultants discussed agency contributions, current regulations governing camp design and management, and enforcement procedures.

A. SURVEYS

1. National Organizations

To obtain information on the contributions being made by national organizations to youth camp safety, project staff developed and mailed a letter of inquiry to 59 national organizations recognized as serving youth or involved in some way with camps and/or safety. The survey population was determined after a review of source lists, bibliographic references in books pertaining to youth and camping, and the Encyclopedia of Associations. A list of organizations surveyed begins on page 3.

The letter (illegible) requested specific information on regulations, standards, institutes and training programs and asked for copies of brochures, pamphlets and instructional materials.

Follow-up phone calls were made to all organizations.

2. American Park and Recreation Society Membership

A similar letter (illegible) was sent to all active members of the American Park and Recreation Society, a branch of the National Recreation and Park Association. This population, approximately 4,000 park and recreation professionals in local government positions across the country, was asked to provide information relating to youth camp safety materials developed or used by the local park and recreation agency or by other local agencies involved in youth camping.

No follow-up phone calls were made.

3. State Contacts

Project staff determined that one person from each state would be selected to collect information pertaining to state laws, regulations and contributions to youth camp safety. Two methods were employed to identify these individuals.

First, project staff recommended persons in several states with whom they were familiar. A memorandum (illegible) as mailed to these persons explaining the project and requesting their participation. Individuals responding affirmatively

AGENCY RECIPIENTS OF LETTER OF INQUIRY

FOR INFORMATION ON YOUTH CAMP SAFETY

I. Public and/or Quasi-Public

A. Outdoor-Oriented

- Boy Scouts of America*
  National Council
  North Brunswick, NJ 08902
- Girl Scouts of the U.S.A.
  830 3rd Avenue
  New York, NY 10022
- Camp Fire Girls, Inc.
  1740 Broadway
  New York, NY 10019
- American Youth Hostels*
  20 West 17th Street
  New York, NY 10011
- Pioneer Girls
  Box 92
  Wheaton, IL 60188
- Rainbow Girls
  Box 768
  McAlister, OK 74501

B. Serving the Disadvantaged

- Boys Clubs of America
  771 First Avenue
  New York, NY 10017
- Girls Clubs of America*
  133 East 62nd Street
  New York, NY 10021
- National Federation of Settlement and Neighborhood Centers
  232 Madison Avenue
  New York, NY 10016
- Big Brothers of America*
  341 Suburban Station Building
  Philadelphia, PA 14103

C. Vocation-Oriented

- National Grange Youth Programs*
  1616 H Street N.W.
  Washington, D.C. 20006
- Junior Achievement
  909 Third Avenue
  New York, NY 10022
- Future Homemakers of America
  2010 Massachusetts Avenue NW
  Washington, D.C. 20036
- Future Farmers of America (Youth)
  National FFA Center
  Box 15160
  Alexandria, VA 22309

*Responded

- 4-H Youth Development*
  Federal Extension Service
  U.S. Department of Agriculture
  Washington, D.C.

D. Religious-Oriented

- National Jewish Welfare Board
  15 East 26th Street
  New York, NY 10010
- B'Nai B'Rith Youth Organization
  1640 Rhode Island Avenue NW
  Washington, D.C. 20036
- Salvation Army*
  120-130 West 14th Street
  New York, NY 10011
- Youth for Christ
  Box 419
  Wheaton, IL 60187
- United Boys Brigades of America
  1211 West 40th Street
  Baltimore, MD 21211
- Youth Life
  720 West Monument
  Colorado Springs, CO
- National Council of Young Isreal
  3 West 16th Street
  New York, NY 10011
- United Synagogue Youth
  218 East 70th Street
  New York, NY 10021
- Order of DeMolay
  International Supreme Council
  201 East Armour Boulevard
  Kansas City, MO 64141
- International Order of Job's Daughters
  719 South Boulevard
  Oak Park, IL 60300
- Christian Service Brigade
  Box 150
  Wheaton, IL 60187
- National Catholic Camp Association
  1312 Massachusetts Avenue NW
  Washington, D.C.

E. Other Youth-Serving

- Young Men's Hebrew and Young Women's Hebrew Association
  135 East 32nd Street
  New York, NY
- Young Men's Christian Association
  291 Broadway
  New York, NY 10007
- Young Women's Christian Association
  600 Lexington Avenue
  New York, NY 10022

- American Youth Foundation
  3930 Lindell Boulevard
  St. Louis, MO
- American Legion
  700 North Pennsylvania Street
  Indianapolis, IN
- Sons of the American Legion
  P.O. Box 1055
  Indianapolis, IN 46206
- United Community Funds and Councils of America
  345 East 46th Street
  New York, NY 10017
- Optimist International
  4494 Lindell Boulevard
  St. Louis, MO 63108
- Rotary International
  35 East Wacker Drive
  Chicago, IL
- Lions International
  332 South Michigan Avenue
  Chicago, IL
- Kiwanis International*
  101 East Erie Street
  Chicago, IL 60611
- Association of Junior Leaguers of America
  Waldorf Astoria
  305 Park Avenue
  New York, NY

II. National Professional and Service Organizations

- National Audubon Society
  Nature Center Division
  1130 Fifth Avenue
  New York, NY 10028
- U.S. Ski Association
  1726 Champa Street
  Suite 300
  Denver, CO 80202
- National Swimming Pool Institute*
  2000 K Street NW
  Washington, D.C. 20006
- National Rifle Association*
  1600 Rhode Island Avenue NW
  Washington, D.C. 20036
- American National Red Cross*
  17th and D Streets NW
  Washington, D.C. 20013
- National Archery Association of the United States
  2833 Lincoln Highway
  E. Ronks, PA 17572
- National Field Archery Association
  Route #2 Box 513
  Redlands, CA 92373

- National Safety Council*
  425 North Michigan Avenue
  Chicago, IL 60611
- National Water Safety Congress
  Lake Cumberland Reservoir
  Jamestown, KY 42629
- Outboard Boating Club of America
  307 North Michigan Avenue
  Chicago, IL 60611
- American Association for Health, Physical Education and Recreation
  1201 16th Street NW
  Washington, D.C. 20007
- National Campers and Hikers Association
  7172 Transit Road
  Buffalo, NY 14221
- American Camping Association*
  Bradford Woods
  Martinsville, IN 46151
- National Science for Youth Foundation
  763 Silvermine Road
  New Canaan, CT 06840
- Appalachian Mountain Club
  5 Joy Street
  Boston, MA
- American Country Life Association
  327 La Salle Street
  Room 228
  Chicago, IL

III. Organizations Serving Special Populations

- National Association of Retarded Children
  2709 Avenue "E"
  East Arlington, TX 76011
- Council for Exceptional Children*
  Department of NEA
  1201 16th Street NW
  Washington, D.C.
- National Easter Seal Society*
  2023 West Oden Avenue
  Chicago, IL 60612
- American Foundation for the Blind*
  15 West 16th Street
  New York, NY 10011

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were mailed a packet of information (Appendix D), which included a description of information needs, suggested sources, a press release and brochure, and a memorandum of agreement.

Second, project staff phoned the five NRPA Regional Directors and explained the overall project and responsibilities of the state contact person. A follow-up letter (Appendix E) was sent to the directors with a list of the states in their regions for which a contact had not been identified. The Regional Directors then located individuals in their states and forwarded to NRPA the names and addresses of individuals agreeing to participate in the study. Each of these persons was sent a letter of inquiry (Appendix C) and an information packet (Appendix D).(See ATTACHMENT I for a list of state contacts.)

B. VISITATIONS

1. National Organizations

Due to the quantity of information published by or available from certain national organizations, it was decided that visitations would be appropriate to selected organizations in the New York City and metropolitan Washington areas. Appointments were made by phone with the Boy Scouts of America, Girl Scouts of the U.S.A., Camp Fire Girls, Inc., American National Red Cross, YMCA, YWCA, The National Swimming Pool Institute and the American Association for Health, Physical Education and Recreation.

During the visitations, project staff collected appropriate materials, discussed the status of youth camp safety and the effectiveness of agency standards for camps, obtained information on education programs, and received recommendations for members of the consultant panel.

2. State Agencies

Visitations were made to selected state agencies in all Continental States but New Mexico and Minnesota to increase the accuracy of evaluating enforcement procedures. Records of regular, mandatory inspections were the prime source of evaluation data.

Staff visited two states having camps which were surveyed by Century Research Corporation to review inspection records. Camps were identified for which a sanitarian had completed the Century Environmental Survey Form. It was noted that for these camps the sanitarian had recorded several questionable environmental and sanitary conditions.

Appointments were made with persons in charge of camp inspection records for the two states surveyed by Century and for two additional states not included in their survey. The main purpose of the visits to these four states was to obtain first-hand information on inspection and enforcement procedures and review actual records to identify if and when violations were noted, and if follow-up or enforcement action was taken. Special attention was paid to camps chosen in the two states falling under the Century survey to compare the violations the state inspector found to those found by the Century Sanitarian. It should be noted that the Century survey was substantially more comprehensive than that of any state inspection; for this reason, some of the areas found lacking by Century were not actually in violation of state regulations. To allow for reasonable comparison of the Century and state inspections, only the areas of commonality were considered.

C. CORDURA "COMPILATION OF LAWS"

The Cordura Company is a computing and software group with offices in Sacramento, California. Because the Manpower Resources Division was compiling state and local laws pertaining to camps, cooperation between project staff and Cordura was appropriate.

The Cordura due-date for completing the compilation was to be after the due-date for this report, and therefore it was necessary for project staff to retrieve the state laws from another source (state contact persons) to have the information on time. It should be noted that Ms. Charlotte Williams of Cordura did cooperate with project staff, however, by forwarding as much data on state laws as had been collected by their investigation. In a sense, the fact that state laws

were in some instances collected by both agencies acted as a validity check on the data.

D. CONSULTANT PANEL/EVALUATION MEETING

A panel of consultants with expertise in the area of youth camp safety was used in the evaluation of contributions and state regulations and enforcement procedures. Panel members were selected from among recommendations made by Cordura Company, Century Research Corporation, national organization staff and state contact people.

The evaluation conference was conducted on August 20-22, 1973 at the National Recreation and Park Association, Arlington, Virginia. (See Appendix F. for a list of participants.) Consultants were provided pertinent information by project staff. Century Research Corporation provided resource information and presented a status report on the illness and injury survey.

IV. FINDINGS

A. SURVEYS

1. National Organizations

The letter of inquiry mailing to 59 national organizations yielded a 27% response. Sixteen responded. The following organizations provided the bulk of information on youth camp safety: American Camping Association, American National Red Cross, Boy Scouts of America, Camp Fire Girls, Inc., 4-H, Girl Scouts of the U.S.A., National Easter Seal Society for Crippled Children and Adults, National Safety Council, and Young Men's Christian Association. A bibliography of the materials collected from these agencies is attached as Appendix G.

All of these organizations, with the exception of the Red Cross, publish books on camp standards directed toward the camp administrator, which contain information on facility and program organization. The Camp Fire Girls, Boy Scouts and Girl Scouts also have materials geared to training youth in various activity areas

related to camping. These three organizations and the American Camping Association conduct leadership and camp management workshops on both national and local levels. The Red Cross publishes primarily water safety and first aid materials and offers a variety of courses at many different levels in these and other fields. The Red Cross Standards and Certificates are recognized and used by the majority of the other organizations listed.

Since swimming plays a large part in most camp activities, it should also be noted that the National Swimming Pool Institute publishes a booklet entitled "Suggested Minimum Standards for Residential and Public Swimming Pools".

The National Rifle Association publishes materials on hunting and firearm safety, including "NRA Shooting Program for Camps" and "Session Plan for Camp Instruction".

2. Local Park and Recreation Agencies

The mailing (4,000) to local park and recreation agencies yielded an approximate 4% return. Many of the materials received did not relate directly to youth camp safety in resident camps. Some of this material included information on forest fire protection, general traffic and home safety, bothersome or poisonous snakes and insects, and poison controls around children. Other material was specifically related to campgrounds or day camps.

Most of the "camping programs" sponsored on a local level are day camps. Many of the recreation departments offering a program of this sort sponsor some special training program for the day camp staff within a training program for all summer staff. When available, the departments' recreation leader's handbooks are usually used for the day camp program personnel also.

Six cities replied that they have resident camp programs and that they have developed materials for such a program. This material includes information on training programs, specific activity safety and general program safety. (See Appendix H.)

Other resident camps mentioned were usually affiliated with a national organization such as Girl Scouts and Boy Scouts, and the publications of these specific organizations were used as standards or guidelines.

3. State Contact Reports and Cordura Compilation

Laws and regulations were received from both Cordura and the state contacts. New Mexico and Minnesota, however, did not respond to the state contact persons or to the Cordura survey.

In most cases, if a state did not have specific camp regulations, the general regulations applicable to camps, e.g., sanitation, water supply, swimming pools, etc., were obtained.

4. Cataloguing Techniques

The following cataloguing techniques were employed to organize the information retrieved:

a. A central file was established, with a folder for each state.

b. Retrieved state laws from each state were separated into predetermined categories of regulations for classification purposes. There were 19 categories in all, with numerous subcategories. A master list of these appears in Appendix I.

c. A checklist comprising all categories and subcategories was developed for each state. For each category, it was noted whether (1) regulations existed, (2) no regulations existed, or (3) suggested standards existed. If the state had established a suggestion or a regulation, it was noted if the regulation or suggestion was (a) specifically directed at camps or (b) was general but appropriate for camps (e.g., general sanitation regulations, fire marshall regulations, etc.). The latter category was checked if, under specific camp regulations, it stated that compliance must be met with a general regulation. (Copies of the state checklist are attached as Appendix J.)

d. A summary sheet was developed to summarize the individual state checklists. Tallies were made of the number of states that had (1) no laws or regulations for each category, (2) a regulation for each category, and (3) a suggestion for each category. (See Table 1.)

In addition to New Mexico and Minnesota, for which no information was obtained, Georgia and Texas were not included in the summary sheets. Both of these states reported that they were currently developing regulations pertaining to youth camp safety and could not provide information at this time.

Out of the 46 states included in Table 14, only 27 required camps to have an operating permit or license; this should not be confused with food service permit or inspection which is required in all states. Of the same number, only between 17 and 25 require camps to be inspected. (This number varies between 17 and 25 because some states require an inspection before the original opening of a camp, and some states specify that a particular authority has the right to inspect the camp, but does not specify whether the inspection is mandatory.)

Many state regulations do not cover camps run by a parent organization and religious groups. Therefore, these camps could operate without having to adhere to any regulations besides those that the national organizations may provide.

Variations in the aspects of camp operation covered by regulations can easily be seen in Table 14 by checking the number of states having regulations covering each of the designated categories.

Sparse and very general comments were received as a result of communication between state contact persons and state agency personnel regarding the adequacy of enforcement. Most of the comments indicated that enforcement procedures were good or strict; however, a number admitted that enforcement was very difficult due to a shortage of inspection personnel.

TABLE 14

SUMMARY SHEET OF STATE LAWS ON YOUTH CAMP SAFETY

(N=46)

KEY: Reg. = Regulation
Sugg. = Suggestion
None = No law listed for category

CATEGORY	REG.	SUGG.	NONE
Plan Approval	21	1	24
Permits and Licensure	27		19
Inspection	17		29
Penalty Clause	17		29
Camp Site, Location	36		10
Water Supply	42	2	2
Toilet, Lavatory and Bathing Facilities	38	3	5
Sewage, Liquid Waste, Plumbing	41	2	3
Vector Control	31	1	14
Refuse and Garbage Disposal	36	2	8
Physical Exam for Campers	15	5	26
Physical Exam for Personnel	10	4	32
Infirmary and/or Medical Staff	22	5	19
Communicable Diseases/Isolation	31	4	11
First Aid Training for Campers	1		45
First Aid Training for Personnel	5	2	39
Animals and Pets (Restrictions)	9	1	36
General Safety Statement	18		28
Emergency Procedures	14	1	31
Handling and Storage of Power Tools and Dangerous Equipment	9		37

TABLE 14 (continued)

CATEGORY	REG.	SUGG.	NONE
Handling and Storage of Poisons	14		32
Handling and Storage of Flammable Material	17	1	29
Fire Prevention	24	1	21
Horseback Riding	6	1	39
Archery	10	1	35
Riflery	10	1	35
Swimming Pools	31	2	13
Natural Bathing Areas	28	2	16
Boating and Canoeing	6	1	39
Fishing	1		45
Field Trips	34	1	11
Manager, Director, Operator	11	2	33
Supervisors (Counselors)	4	1	41
Caretakers	13		33
Staff-Camper Ratio	5		41
Food Service Facilities	42	2	2
Sleeping and Living Quarters:	37		9
A. Bedding	28		18
B. Ventilation	28		18
C. Heating	9		37
D. Lighting	21		25
Transportation of Campers	8		38

Table 15 summarizes legislation, inspection and permit requirements for each state as compiled by Charlotte Williams of the Cordura Company. Thirty-six states had some regulations specifically for camps. The state regulations varied greatly in the areas covered and in their specificity.

B. VISITS TO FOUR SELECTED STATE AGENCIES

The following procedure was used to indicate the results of special state visitations. The four states are referred to in this report as State I, State II, State III and State IV to conceal their identities. The camps referred to specifically are noted by letters of the alaphabet with a superscript designating the state in which the camp is located (e.g., Camp A^{I} or Camp B^{II}).

1. State I: This state has a system of voluntary certification only. Camps wishing state certification must request it. The state department will make an inspection to determine if the camp qualified for certification. If the camp does not pass inspection, there is no penalty, except the denial of certification. State I was one of the two states in which a sanitarian from Century Research Corporation administered an Environmental Survey Form to camps. The following is a comparison of the state inspection and the Century inspection.

Environmental Survey Findings	State Inspection Findings
CAMP A^{I}*	
• Fire extinguishers not available (in sleeping facilities)	• Everything marked O.K.
• Bottom of pool swimming area not visible	
• Unmarked fire exits (in kitchen and dining areas)	
• Unscreened building openings (in kitchen and dining areas)	

*camp certified by state

TABLE T3

STATE REGULATIONS COMPILED BY CORDURA

	XX-Excellent-Have Leadership X-Fairly Comprehensive	No Applicable Legislation	Direct Legislation	Enabling Legislation	License	Permit	Registration	Annual Inspection Required	Fee	Enforcing Agency	Date of most Current Legislation	Date of John Kirk's Compilation
	ALABAMA			X						H		1940
	ALASKA			X		X		X2		HW	1959	1949
	ARIZONA		X		X				25.00-3 10.00-2	H	1958	1956 (1961)
	ARKANSAS			X						H		47-60
X	CALIFORNIA		X				X	X2		H	1971	60-61
XX	COLORADO			X	X			X	1.00,5.00	W	1970	1953
X	CONNECTICUT		X		X			X5		H	1969	1958
	DELAWARE			X		X		X		H	1966	1953
	DISTRICT OF COLUMBIA	X								?	1958	
	FLORIDA			X		X		X-3.2		H	1971	1960
	GEORGIA	X								H	1964	1961
	HAWAII	X										1955
	IDAHO	X								H		1947
X	ILLINOIS (no leadership)		X			X		XX	25.00	H	1972	1961
	INDIANA	X										1949
	IOWA	X										1962
	KANSAS	X		X water is sewage, contagion, disease only						H	1966	1949
X	KENTUCKY (no leadership)		X					X		H		1962
X	LOUISIANA			X		X		X		H	1968	1950
X	MAINE		X		X			-??	15.00	HW	1973	1954
	MARYLAND			X		X		O		HM	1970	1957
X	MASSACHUSETTS (no leadership)	X			X			X2		H	1963	1951
X	MICHIGAN			X	X			X		SS/HF	1972	1960
	MINNESOTA (have not reported)											45-61
	MISSISSIPPI	X		X						H	1942/69	1942
	MISSOURI	X								ACA/H	1949	1949
	MONTANA			X	?					H	1968	1947
	NEBRASKA		X			X		X	10.00	H	1960	43-61
	NEVADA	X		X		X		X		H	71 & 59	1961
X	NEW HAMPSHIRE				X			X	20.00	BSE	1971	1955
	NEW JERSEY	X									67 & 68	1960
	NEW MEXICO	X										1953
	NEW YORK			X		X				H]	1972	1954
X	NORTH CAROLINA (no leadership)			X		X		X		H		1960
X	NORTH DAKOTA (no leadership)			X						H	1970	1960
	OHIO (have not responded)											1954
	OKLAHOMA (no legislation)			X						H		1941
	OREGON (no leadership)	X	X		X		X	X-4	15.00	H-HRD	1973	1961
	PENNSYLVANIA (no leadership)	X			X					E-R	66,70	1949
X	RHODE ISLAND			X						H	1968	1956
	SOUTH CAROLINA					X		X		H	1972	1952
	SOUTH DAKOTA	X	nothing--									59-60
X	TENNESSEE		X			X		X-5		H	1970	1955
	TEXAS (none till bill passed on July 1973		X							H	1973	1960

(Cont'd.)

XX-Excellent-Have Leadership

X -Fairly Comprehensive

		No Applicable Legislation	Direct Legislation	Enabling Legislation	License	Permit	Registration	Annual Inspection Required	Fee	Enforcing Agency	Date of most Current Legislation	Date of John Kirk's Compilation
_	UTAH (not designed for youth camping			X						SS	1968	1953
	VERMONT (no leadership)			X		X		X	5.00	H	1971	1959
X	VIRGINIA (no leadership)			X		X		X			1971	1950
_	WASHINGTON			X			X					1962
X	WEST VIRGINIA			X		X		X		H	1963	1961
XX	WISCONSIN			X	X			X		H&SS		1957
_	WYOMING (no leadership)			X		X		X	0	H&SS	1957	1957

H & HRD - Health Div.,Dept. of Human Resources
ER - Environmental Resources
BSE - Bureau of Sanitary Engineering
H - Health Dept.
W - Welfare Dept.
SS - Dept. of Social Services
HW - Health & Welfare
HM - Health & Mental Hygiene
B - Board of Standard of Child Care

1. Local Dept. enforced regulations
2. No specification regarding frequency of inspection in law
3. Required when opening new facilities only
4. Required every 6 months
5. Required twice a season

Environmental Survey Findings	State Inspection Findings
CAMP B^{I}*	
• Improper trash containers (in campsite)	• Dishwashing facilities inadequate
• Deck/beach area hazardous	• Hazardous materials not labeled; stored improperly
• Garbage not stored in adequate number of approved containers (in dining and kitchen areas)	• Fire extinguishers not available
CAMP C^{I}*	
• Hot and cold running water not available (in kitchen area)	• Septic tank lid needs repair
	• Screen in food preparation area needs repair
	• Excremental matter accessible to flies
CAMP D^{I}	
• Loose trash and debris (in campsite)	• Camp did not request certificatior so it was not inspected by state
• High weeds	
• Improper trash containers	
• Fire extinguishers not available (in sleeping facilities)	
• No hot running water (in sanitary fac.)	
• Inadequate chlorine residual and pH log (swimming pool)	
• Inadequate filter design on maintenance (swimming pool)	
• Bottom of pool/swimming area not visible	
• Unsanitary condition of kitchen area	
• Food adulterated or spoiled	
• Utensils improperly stored	
• Dishwashing facilities inadequate	
• Tableware not sanitized	

Environmental Survey Findings	State Inspection Findings
• Accumulation of grease on food equipment, stoves, etc.	
• Inadequate insect and rodent control	

In addition to information for this comparison, the following items were found in the inspection records:

(a) State I inspected and certified a camp which the national agency to which the camp belonged would not certify. In addition, a subsequent health food service inspection found the camp quite unsatisfactory.

(b) The inspection form for a camp in State I was marked O.K., but the camp was not certified by the state.

(c) One camp was accredited by a national camp accrediting organization but did not pass inspection for certification in State I.

(d) One camp was not inspected because it closed for the season before the inspection could be made. A lack of an official inspection schedule has allowed many camps to go for years without inspection in State I.

2. State II: State II requires that camps be inspected before the initial opening of a new camp and subsequently once a year. When applicable, the inspection is in four areas: camp, water, swimming pool, and food service. However, the person in charge mentioned that there were not enough personnel to inspect every camp once a year. A review of the records indicated that many camps had not been inspected since 1970.

The following is the comparison of the Century inspections and the state inspections:

Environmental Survey Findings	State Inspections Findings
CAMP A[II]	
• Garbage not stored in adequate number of approved containers (in kitchen area) • Inadequate chlorine residual and pH log (swimming pool)	• Everything marked O.K.
CAMP B[II]	
• Improper operation (of solid waste disposal) • Inadequate facilities for maintenance of proper (hot/cold) food temperatures • Dishwashing facilities inadequate • Tableware not sanitized • Utensils not properly stored • (Comment: only 2 small kitchen sinks for dishwashing)	• Everything Marked O.K. (When asked what were considered by the state agency as adequate dishwashing facilities, the state person replied that the camp must have a dishwasher or 3 sinks).
CAMP C[II]	
• Bottom of swimming pool not visible • Deck and beach area hazardous • Utensils improperly stored • Tableware not sanitized • Garbage not stored in adequate number of proper containers	It was noted that before this camp could open it must: • Clean up food preparation area • Repair and paint flooring • Place a thermometer in refrigerating and heating units • Replace screens in restrooms • Repair hole in kitchen wall • Remove pest strips

State II cannot immediately close down a camp because of conditions found during an inspection. The swimming pool is the only area that can be closed if not satisfactory. The inspector can place a time limit on correction of violations; a follow-up check on these corrections is fairly good. The problem is not so much lack of enforcement procedures in this state as it is lack of inspection.

Camps are not supposed to operate without a permit, which is issued each year after inspection of the camp. However, simply by applying, and without yearly inspections, camps are receiving permits issued on the basis of their past records. This process has arisen due to lack of personnel.

3. State III: State III requires each camp to have a yearly operating permit. Here again the permit is issued only after the camp has passed inspection by the county office of the State Health Department.

The chief sanitarian, with whom project staff spoke, mentioned that due to the small number of camps within a county and the division of the county into regions, each with a sanitarian, the inspections were frequent and consistent. This state provided an unusual service; the employment of one individual whose function it was to take water samples during the summer, thereby relieving the sanitarians of one are of inspection.

This state designated three major areas of camp inspection: water, sewage, and food service. Serious violations in any of these areas are sufficient cause to suspend camp operation. Camp directors are warned of minor violations and allowed reasonable time in which to make corrections. The closing of camps is, however, the only means for enforcing state permit requirements. This action is taken only if the seriousness of the violation warrants it.

Since camps in State III were not included in Century Research's study, project staff had no basis for comparing inspections. It should be noted, however, that the inspections conducted by this agency generally coincided with standards employed in the other areas visited. Following are examples of inspection violations found in several camps:

- Toilets and sinks dirty in sleeping area
- Swimming pool bottom dirty
- Swimming pool depth markers illegible
- Backwash chart not posted
- Bathhouse dirty
- Food utensils and equipment not properly stored.
- Freezers not provided with thermometers

These violations were of a minor nature and permits were issued. The camp director was notified that corrections were to be made prior to opening of camp season.

Project staff was informed that, although state regulations existed regarding swimming pool sanitation a few years ago, very little could be done to make operators adhere to regulations because of time lapses and state red tape. It was not until recent passage of a swimming pool ordinance that the sanitarians had real authority and support to force swimming pool operators to comply to sanitation laws or have their pools shut down immediately.

4. State IV: State IV is unique in that violations of camp safety regulations in the major sanitation areas is a criminal offense rather than a misdemeanor. The serious consequence of violations prompt the inspecting agency to work with the camps to correct violations rather than to take action against them. Here again certification is necessary for operation, but the request is received and certificate issued on the local rather than state level.

Areas of major concern were similar to those of the other states: sewage, water and food service. State IV's inspections also covered most other aspects of camp health and safety.

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The sanitarian interviewed indicated that structure or construction violations were among the most common and most serious offenses. However, these were extremely difficult to correct because some regulations took effect after the time of construction, and compliance would necessitate costly modifications in design.

In these situations, the department representative attempts to aid the director by providing suggestions for gradual replacement or revision of facilities, with emphasis on corrections in the sewage, water and food service areas. Legal enforcement is used only as a last resort.

It should be noted that there were a small number of camps in this state and that the inspecting staff was relatively large in comparison to those of some other agencies visited.

C. CONSULTANT MEETING

It became apparent during discussions of the contributions made to Youth Camp Safety that most of the information published concerning training of camp directors and staff, organization and maintenance of safe camps, camp standards, and in-service and continuing education programs was not available to the general public. Much of this information is distributed to members of the publishing organization only. Limited access appears to be a fairly universal pattern, except in the case of the American National Red Cross and National Safety Council. The American National Red Cross training programs and materials are well publicized and available to the general public. The Camping Committee of the National Safety Council publishes a book entitled "Youth Camp Directors Safety Guide", which is not as well publicized as the ANRC material, but is available to the general public.

The consultant panel felt that because of this situation, camp operators who were not associated with one of the previsouly mentioned organizations would not have access to the bulk of published materials. Panel members felt that a central agency should be established to disseminate such information or recommend sources.

As to the question of other possible information sources, the consultants mentioned the fact that white water canoe groups are beginning to prosper throughout the country and that these groups often provide training in safety for white water canoeing.

In addition, the U.S. Coast Guard Auxillary provides training programs, regulations, and enforcement of safe boating habits. The new Federal Boating Act has provided for standardized boating regulations along with the funding of two projects. One of these projects to be undertaken by the National Safety Council is a study of why people do or do not use personal floatation devices. The other is a study of the effectiveness of boating education programs and will be administered by the American National Red Cross.

The National Safety Council, Youth Department, will be conducting a behavioral study of risk-taking and young people.

It should, of course, be recognized that some colleges and universities offer professional training courses in counselor and camp administration, supervision and leadership, child development and first aid.

After analysis and consideration of the information available on state laws, the panel agreed that existing overall state laws do not adequately deal with the safety of campers. They emphasized that:

1. Many states that have laws dealing with camps regulate only the sanitation aspects of camp operation.

2. General regulations, which are often applied to camps, do not make allowances for the nature of the camp experience. For example, certain regulations regarding eating and drinking facilities, to which many camps must adhere, do not allow meals to be served family style; regulations requiring washable walls in dining areas are being enforced in a primitive camp setting.

The consultant panel generally agreed that there appeared to be a lack of consistent enforcement of regulations. They felt this stemmed, primarily, from a lack of consistent interpretation of regulations which were usually too broad or too technical.

The panel concluded that camping is a special situation which must be given separate consideration in the development of regulations. Regulations must be broad enough to cover the entire scope of child health and safety.

V. CONCLUSIONS

A. CONTRIBUTIONS TO YOUTH CAMP SAFETY

The American Camping Association, American National Red Cross, Boy Scouts of America, Girl Scouts of the U.S.A. and Camp Fire Girls, Inc. all sponsor in-service and continuing education programs on both the local and national level. With the exception of offerings of the American National Red Cross, courses consist of camp management and training specifically geared to members of each of the sponsoring organizations. It is possible for non-members to attend these courses, but the classes are designed to meet the needs and goals of the individual agencies and are based on management principles of the agencies.

The American National Red Cross offers specialized training in the areas of water safety and first aid. These courses are open to the public and are well publicized. Most camps offer some type of pre-service education for their counselors before the camp opens. This usually is more like an orientation to the camp facilities, regulations and organizations.

Local agencies that sponsor camp programs many times offer a one week pre-service training program for the purpose of orientation and training in camp craft skills.

All of the camp management courses reported are offered by private organizations for the benefit of their members. These training courses are not mandatory for camp directors in any of the organizations.

Besides individual camp pre-service training programs, which are usually more of an orientation program, there are no course offerings for the camp director or counselor who is not a member of one of the above organizations.

It should be noted that many camps offer, on an individual basis, a junior counselor training program. These programs allow a person, who is usually too young to be a counselor, to act as an aid to a counselor and gain valuable in-service training.

The lead in development of education materials, standards, and films in the area of youth camp safety is also taken by the previously mentioned organizations plus the National Easter Seal Society, Y.M.C.A., National Safety Council and the American Rifle Association. Although the latter organizations do not sponsor training programs, they do publish guides, manuals, and standards to aid camp operators.

The Boy Scouts,Girl Scouts and Camp Fire Girls also promote health and safety in camping through their merit badge requirements and skills listed in their respective handbooks.

A few of the local agencies that sponsor camp programs have developed their own training manuals. These are usually for the use of the counselors and are the exception rather than the rule.

The educational materials, standards and films, like the training programs, are geared specifically to members of the individual organizations. The exceptions are the National Safety Council's publication Youth Camp Directors Safety Guide", the National Rifle Association's guidelines for shooting programs in camps, and the National Swimming Pool Institute's standards for public swimming pools. Although these publications are readily available, the National Rifle Association's publi-

cation was the only one that was mentioned as being used. The other two publications do not seem to be very well known.

No information was received to indicate that any state agencies were sponsoring camp training programs or developing any camp safety materials.

It can be concluded that the majority of contributions to youth camp safety are being made by private organizations as part of their direct service to their membership. There is very little information that is generally known by and available to non-members.

B. ADEQUACY OF STATE LAWS

With very few exceptions, state laws relating to camp safety were found to be grossly inadequate. In some states they were completely nonexistent.

Laws specifically regulating resident camp safety were not inclusive enough to cover all areas of camp safety, e.g., those laws which do provide for basic health and safety considerations in the original construction, grounds and facilities of a resident camp, but make no provision for regulating safety programs or staff requirements.

Other state's regulations allow camps operated by certain types of organizations to be exempt from adhering to the regulations. Where generalized regulations do exist, resident camps and a variety of other operations are lumped into an all encompassing category. These regulations fall short of providing specific standards necessary for the safe execution of a resident camp experience. As an illustration, one might consider the usage of outdoor latrines rather than indoor bathrooms. Such outdoor sanitary facilities can be implemented in a safe and healthy way, but no provisions for such use are made in health and safety regulations designed to govern the operation of general food serving or resident establishments such as restaurants and rest homes. Another specialized experience might be dining family style in a rustic building constructed with rough-hewn boards or logs. As mentioned previously,

a requirement restricting family style dining and requiring wash-down walls would be detrimental to the total camping experience.

It is concluded, then, that camping as a unique experience requires very specialized laws to regulate health and safety standards. In most cases regulations of this type do not exist.

C. ADEQUACY OF ENFORCEMENT

It can be concluded, on the evidence of this study, that enforcement is difficult at best and often impossible to achieve.

Resident camping is normally a seasonal operation. The inspection and subsequent enforcement of regulations are usually conducted by the environmental health or some similar local office of a state authority. The major function of this inspecting agency is monitoring the operation of year-round establishments which also demand additional attention during the summer season. These inspecting agencies are frequently understaffed, so the added responsibility of regulating seasonal resident camp health and safety standards is, on occasion, given a secondary priority. These agencies may even find it impossible to conduct inspections of all the resident camps within their jurisdiction.

Once inspections take place and violations are noted, the enforcement on a local level of what are usually state laws is viewed as a long and costly process, the results of which do not justify the expenditure of time and funds. The exceptions to this general principle are those violations which would result in a definite health or safety hazard of major proportion.

VI. RECOMMENDED CONSIDERATIONS IN DEVELOPING CAMP REGULATIONS

In the development of all regulations, the setting and objectives of the camp program must be considered. Centralized camps, trail camps, primitive camps and day camps should be considered separately from resident camps. It should be noted that for resident camps, especially for sanitation, food and health, two sets of regulations should exist: one set for camping the main camp and another

for more primitive camping away from the main camp.

The consultant panel made the following recommendations concerning the categories which should be considered in developing camp regulations in order to assure the broadest possible coverage of health and safety factors.

Resident Camps

1. Annual Inspection
2. Permits, Licensing and Registration of All Camps
3. Enforcement of Regulations (source and penalty clause)
4. Sanitation and Public Health
   - Toilet facilities (ratio and construction)
   - Sewage disposal
   - Solid waste disposal
   - Bathing and handwashing facilities
   - Insect, weed and rodent control
   - Animal regulations
   - General cleanliness of campgrounds and facilities
   - Water supply
5. Food
   - Food source
   - Food protection and food handling
   - Meal planning (trained dietition consulted)(nutritional requirements)
   - Food storage and refrigeration
   - Sanitation of dishes and utensils
   - Milk supply (serving method secondary to supply)
   - Food service employees
6. Site and Facilities
   - Site selection (location, participant density, social and health hazards, drainage, ground cover, sources of water, access, environmental conditions)

- Site layout and development (master plan)
- Site management (appropriate ecological principles in line with program needs)
- Facility design, utilities and services (food services, toilets, showers, medical services, maintenance, waste disposal, liquid fuels, swimming pools, laundry, etc.)
- Shelters for living and sleeping (ventilation in cabins and/or tents, camper capacity and cubic air space requirements, adequate and individual sleeping areas--bed, bunk, air mattress, lighting and heating)
- Facility design and program (health and safety factors in design, equipment and management of programs requiring specific and specialized facilities, e.g., riflery, archery, aquatics--boating, swimming, canoeing, scuba, etc., horsemanship, use of wood tools--knife, axe, saw, mountaineering, trip camping and cave exploration)

7. Personnel

Every camp should have a defined purpose--a statement of objectives and goals which serve as a framework for the camper's experience. These goals and the methods used to achieve them may vary from camp to camp. They will influence the selection of camp staff and the competencies required.

Due to the diversity of objectives, philosophies, and goals under which camps operate it is virtually impossible to make recommendations to cover every staffing consideration. For example, camps with large enrollments have different personnel needs than those with small enrollments. Likewise, those camps offering specialized programs have different personnel needs than those offering a broad program.

However, within this wide diversity of needs and programs, there are some common factors that can be considered in selecting staff:

- Age of employee
- Experience and training of employee (references)
- Ratio of campers to staff (in relation to type of camp, type and age of campers, age of supervisor)

8. Program Safety

Camp staff should be thoroughly familiar and comply with all local and state safety laws and regulations. Safety training for safety consciousness should be an integral part of all camp programs. Qualified staff should attend to the following items and should identify additional concerns:

- Supervision of activities
- Incorporation of all safety education for staff and campers in all program activities, skills practice and care of equipment
- Recognition and minimization of hazards (within and near site)
- Conduct of regular drills for handling emergencies (fire, flood, wind and other disasters)
- Maintenance of an efficient communication system (within camp and with outside world)
- Posting of fire regulations and instructions for proper use of equipment handling and storage of flammable liquids, poisons, tools, etc.
- Execution of special program activities in a manner consistent with generally recognized standards (such as, but not limited to, those of American Red Cross, National Rifle Association, American Archery Association, Under Water Society of America and American Water Skiing Association)
- Special consideration of precautions to be taken for out-of-camp trips (transportation, supervision, food, sanitation, medical supplies, first aid training and site)

9. Personal Health, First Aid, Medical Services for Resident Camp

- Doctor on call
- Standing orders for infirmary supplies, practices, treatment
- Arrangements with hospital for emergency care
- Qualified health supervisor on staff
- Physical examination for both campers and staff or written waiver
- Health history and statement of immunization record

- Permission for emergency medical care and hospitalization or written waiver from parents or guardians
- First aid training for staff and campers
- Camp infirmary and plan for isolation of campers
- First aid supplies at infirmary and program centers
- Medical treatment record/log
- Health/accident insurance for staff and campers
- System of health supervision when groups are in primitive units and/or out of camp
- Emergency transportation must be available
- Emergency evacuation procedures
- Procedures for handling and disbursement of medication

10. Transportation

- Vehicles and equipment (type, maintenance, operation, capacity, passenger use)
- Drivers and leadership (leadership pertains to supervision of children especially when there is a large group--age and experience should be considered for both)
- Insurance
- Standards for vehicular traffic on camp site

Day Camps and Travel and Trip Camps

Day Camping is defined as a sustained daytime experience which provides creative recreational and educational opportunities in group living in natural out-of-doors surroundings. Standards for residential camping apply for day camping where appropriate.

Travel Camping is a program which utilizes some mode of transportation to move the campers as a group from one site to another over a series of three or more consecutive days for experiences in different environments. Transportation may include, but is not limited to, a van, bus, station wagon, automobile, airplane,

boat, train, horse, bicycle, feet or a combination of one or more of these modes.

1. Personnel Qualifications and Standards
   - Age requirement for counselors
   - Counselor-to-camper ratio
   - Minimum age of director
   - Required training for aquatic staff
2. Sanitation and Public Health
   - Toilet facilities
   - Sewage disposal
   - Garbage and waste disposal
   - Insect, weed and rodent control
   - Animal regulations
   - Camp cleanliness
   - Safe water supply
3. Personal Health, First Aid and Medical Service
   - Medical care on call
   - Physical exam required
   - Health supervisor on staff
   - First aid supplies
   - Medical treatment record
4. Food Handling, Mass Feeding and Cleanliness
   - Food protection and food handling
   - Food storage and refrigeration
   - Milk supply and serving method
   - Meal planning
   - Sanitation of dishes and utensils

5. Program Safety
   - Supervision of activities
   - Restriction of hazardous activities
   - Aquatic facilities
   - Horseback riding procedures
   - Fire regulations
   - Heating equipment
   - Program equipment
6. Transportation
   - Condition of camp vehicles
   - Age and qualifications for drivers
7. Site and Facilities
   - Location and drainage of site
   - Type and size of living quarters
   - Sleeping accommodations
8. Travel and Trip
   - Travel itinerary filed
   - Medical care plan on file
   - Parental designation of Director as temporary guardian

ATTACHMENT I

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LIST OF APPENDIX TITLES

Appendices referred to in the description of Phases II, III, and IV have been submitted to the Center for Disease Control under separate cover. They include:

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SUMMARY

This study was conducted for the U. S. Department of Health, Education and Welfare to assist in determining:

1. the extent of accidents and illness in youth camps
2. the contribution to youth camp safety being made by State and local public and private agencies and groups
3. whether existing State and local laws adequately deal with youth camp safety
4. the degree of enforcement of State and local laws relating to youth camp safety

Over 200 sponsored youth camps in twenty randomly selected areas of the country participated in a survey of their facilities and their injury and illness experience during the summer of 1973. Additional information was collected on programs of various private organizations and governmental agencies which relate to youth camp safety. Adequacy and effectiveness of State laws and regulations pertaining to youth camps was also assessed.

The Survey

The camps participating in the survey were mostly large with a median capacity of 165 campers, although 22% were under 100 in capacity. More than half (57%) were accredited by some camping association. Most camps were required to have some kind of permit or license, but about one-fifth to one-third of camps, depending on the section of the country, required no permit. Many times permits are issued which do not require an

inspection, but about half to three-fourths of the camps did require one; in States with laws specifically regulating camps, nearly all (96%) camps needed to be inspected before being issued a permit.

Counselor qualifications varied greatly with the type of camp sponsor, but the more common requirements appear to be:

18 years old or older

A college student or graduate

Some previous experience as a camper or counselor

Some experience with a camp specialty

Miscellaneous desirable personal qualities

The most usual arrangement for health care at a camp is to have a registered nurse in residence and a medical doctor on call. Over 90% of the camps had an infirmary. Most camps require a physical examination of the camper and claimed to accept applicants with medical conditions. However, many of the latter accepted only those medical conditions that would not interfere with the normal camp program.

Of over 4000 injury reports filed, there were 54 that could be considered "serious" because they required hopsitalization, sending the camper home, or resulted in a partial permanent disability. The overall rate for all reports filed was approximately 5 to 6 per 1,000 camper days; the rate for "serious" ones was less than 1 per 1,000 camper days. Falls accounted for the greatest number of injury reports. Walking and running and playing in competitive sports were the most frequent activities. The largest single type of injury was lacerations or

cuts of the fingers. Most injuries involved the extremities.

The frequency rate for illness reports was between 9 and 10 per 1000 camper days. Of over 7000 such reports filed, there were 216 that resulted in hospitalization, going home, or laboratory tests and hence could be considered the more serious cases. Most of these involved some form of upper respiratory infection or inflammation. There were a few cases of childhood diseases and three cases of known appendicitis.

Inspections of camps by sanitarians revealed them, for the most part to be clean and relatively free of hazards. Chief among areas of possible improvement was the area of fire protection.

Other Findings

Although a number of organizations offer in-service and continuing education programs, these are geared to meet the needs and goals of the individual organizations and are usually concerned with camp management. Specialized courses in water safety and first aid are offered by the American National Red Cross. These are well publicized and open to the public.

Guides, manuals, and standards to aid camp operators are published by a number of organizations, but again these are geared to the needs of the organizations for the most part.

State laws relating to camp safety were found to be grossly inadequate, either because they were altogether lacking, or that they were not inclusive enough to cover all areas of camp safety.

Enforcement is difficult and sometimes impossible to achieve. Inspection agencies are frequently understaffed and especially during the summer season which is the normal period of operation for most camps. Enforcing the correction of any violations cam be a long and costly process which local officials may not feel is worth the expenditure of time and funds.

The report presents recommended standards in developing camp regulations. These are presented separately for resident camps and for day camps and travel and trip camps.

DRAFT OF FINAL REPORT
TO
CENTER FOR DISEASE CONTROL
ON
YOUTH CAMP SAFETY

Prepared for:

Center For Disease Control
Public Health Service
U. S. DEPT. OF HEALTH, EDUCATION AND WELFARE
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Public Health Service Grant
MSM-99-73-54

February 1, 1974

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VOLUME III - SUGGESTED MODEL STATE YOUTH CAMP ACT AND REGULATIONS

PREFACE

In September, 1973, Cordura was contracted to complete the following work on the Youth Camp Study for the Center For Disease Control:

- Phase I

  1. Development of a model outline of Youth Camp Safety regulations;
  2. A state by state comparison of existing laws with the model outline of regulations;
  3. Rating of existing state regulations on a weighted basis;
  4. Narrative justifying the assigned rating;
  5. Conclusions based on an analysis of the existing laws.

- Phase II

  The development of a model set of regulations with language usable for state utilization.

- Phase III

  The writing of a draft report, based on information available to the Government, which could serve as a basis for the writing of the final report to Congress by the Center For Disease Control. The report will cover:

  1. Extent preventable accidents and illnesses are occurring;
  2. Contribution to camp safety by state and local public agencies;
  3. Whether state and local laws are adequate; and,
  4. Whether existing state and local laws are adequately being enforced.

Phase I and II have been completed as outlined above. Phase III - the writing of a draft report - was modified on January 11, 1974 - because the material needed to write the report was not made available to Cordura until 28 January 1974. Section 2.1.4 - CDC Mailing - Methodology And Findings; and Section 2.1.5 - Newspaper Clippings - Methodology And Findings - were added by Cordura to the original scope of work in order to provide some information on the extent of preventable accidents and illnesses.

Cordura is pleased to present the enclosed sections of the final report to Center For Disease Control on Youth Camp Safety.

VOLUME I

STUDY OF YOUTH CAMP SAFETY

A SUMMARY

1.3 BRIEF HISTORY OF CONGRESSIONAL INTEREST INCLUDING VERBATIM STATEMENT OF ACT PROVIDING FOR STUDY

Camping in the United States is a thriving enterprise. Every year, millions of children are sent to camps by parents or organizations for a healthy change from school activities. If camping did not prove to be beneficial for most of these young people, it would not continue to be so popular. However, illness and accidents occurring during the camp season mar the experience for many.

Undoubtedly, many camping mishaps and illnesses are avoidable. To what extent they could be prevented by more extensive regulations of youth camps is a question that has concerned private individuals and government authorities for several years.

A Connecticut resident, Mitchell Kurman, whose son was killed in a camping accident in 1965 has been largely responsible for focusing Congressional attention on the camp safety problems. In the late 1960's, Mr. Kurman enlisted the aid of Representative Dominick Daniels of New Jersey, who sponsored a bill requiring the establishment of minimum Federal Standards for youth camps. Three

Congresses (90th, 91st, and 92nd) held hearings on this subject. Several other bills proposing Federal Standards, including that of Senator Ribicoff of Connecticut, were considered and rejected by the legislators.

In the 92nd Congress, Representative J.J.Pickles of Texas presented the argument that more information was needed on present camp safety and health conditions before a decision could be made on imposing Federal regulations. In June 1972 the Congress passed Title VI of the Education Amendments of 1972 (Public Law 92-318) "Investigation of Youth Camp Safety". This Act directed the Secretary of Health, Education and Welfare to "make a full and complete investigation and study to determine:

1. The extent of preventable accidents and illnesses currently occurring in youth camps throughout the nation;

2. The contribution to Youth Camp Safety now being made by state and local public agencies and private groups;

3. Whether existing state and local laws adequately deal with the safety of campers in youth camps;

4. Whether existing state and local laws relating to Youth Camp Safety are being effectively enforced; and,

5. The need for Federal laws in this field."

The Act also directed the Secretary of Health, Education and Welfare to make a report to the Congress before March 1, 1973 on the results of his investigation and study under this title. Such report was to include his recommendations for such legislation as may be necessary or desirable. $300,000 was appropriated for carrying out the purposes of this title. This Act was approved on June 23, 1972.

1.3.1 Previous Research

A 1968 survey by the American Camping Association listed approximately 10,700 resident and day camps in the United States, attended by over 7½ million children. Only 3000 of these camps were accredited by the Association; in other words, less than 1/3 of the nation's camps were known to conform to this Association's Standards. It is estimated that approximately the same proportion of camps established since 1968 have been accredited by this Association.

Investigators for the Department of Health, Education and Welfare in 1973 found that there were few comprehensive research studies on accidents and illnesses in camps or on camp conditions. They determined that the existing studies were not useful in developing the National data required by Title VI of Public Law 92-318, as they were outdated or limited in geographical scope; their definitions and data collection techniques differed to such an extent that a compilation of statistics would not be acceptable, and they did not report either the severity of camp injuries and illnesses or the circumstances surrounding the occurrences. Therefore, the extent and preventibility factors were unknown.

The most extensive nationwide analysis of state and local laws relating to youth camps concentrated on the theoretical adequacy of the laws (An Analysis of State Laws Affecting The Operation of Children's Summer Camps in the United States With A Suggested Universal Legislative Program by John J. Kirk, Ph.D, an unpublished doctorial dissertation, Univ. of Michigan, 1963). The investigation for the Department

of H.E.W. felt that this analysis provided no information about the enforcement or the practical adequacy of those laws.

Finally, contacts with camping associations, private groups and individuals, did not yield information which would fulfill the requirements of the law.

1.4 SCOPE OF WORK

As a result of the lack of data, the Department of Health, Education and Welfare designed an intensive study of Youth Camp Health and Safety to be conducted during the summer of 1973.

The purpose of the study was to fulfill Tasks I through IV of Title VI, which were: (1) to determine the extent of preventible accidents and illnesses currently occurring in youth camps; (2) the contribution to youth camp safety now being made by state and local public agencies and private groups; (3) whether existing state and local laws adequately deal with the safety of campers in youth camps; and, (4) whether existing state and local laws relating to Youth Camp Safety are being effectively enforced.

1.4.1 Approach, Methodology and Sources of Data
1.4.2
1.4.3

The investigation, conducted during the summer camping session of 1973 was designed to study approximately 200 youth camps selected according to random sampling techniques from a national population. The investigation was to study the frequency, types, severity and causes of injuries and illnesses; assess the existing environmental conditions and administrative practices of the camps sampled; determine the contribution to to Youth Camp Safety now being made by state and local public agencies and private groups; compile the pertinent State Youth Camp Laws and in those states surveyed, based upon the most probable causes of injuries and illnesses as determined during the camp survey, determine if the State Laws adequately deal with the observed problems; and to determine how effectively these laws are being enforced.

Based on the findings of this study, the Department of Health, Education and Welfare is responsible for assessing the need for, and if necessary, recommending Federal legislation in this field.

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1.4.4 Award of Contract to CR, NRPA And Cordura

Much of the work was contracted to Century Research Corporation of Alexandria, Virginia to investigate the extent of accident and illnesses occurring nationally in youth camps. The principal method was a sample survey from which reports permitting an estimate of the number and nature of medically-attended camping injuries and illnesses for one camping season were obtained. In addition, information was gathered on health and safety conditions and other characteristics of camps included in the survey sample.

The National Recreation and Park Association, as a subcontractor to Century Research Corporation, was given the task of providing the information required by the Department of Health, Education and Welfare concerning contributions to camp safety which are being made by various private organizations and governmental agencies. They also were responsible for determining the adequacy and effectiveness of State Laws and regulations pertaining to youth camps.

A separate task, the Compilation of State and Local Laws and Regulations Pertaining to Health and Safety in Youth Camps as well as a comprehensive analysis of these regulations was contracted with Computing and Software, a Cordura Company of Sacramento, CA.

The American Camping Association was contracted to compile a list of youth camps in the U. S. A. and also to conduct a field survey of the forms to be used in the survey.

1.4.5 Limitations And Constraints

Background

The Act authorizing the Investigation of Youth Camp Safety was approved on June 23, 1972. The Bureau of Community Environmental Management was designated by the Department of Health, Education and Welfare as the government agent to conduct the study. Soon after the enactment of the Act (Public Law 92-318) the Department initiated the required investigation, contacting selected State health agencies, private agencies involved in youth camping, the National Safety Council and others who normally maintain statistics of this nature. A thorough search of

the existing literature was made, revealing only six previous studies of accidental injuries and illness problems in youth camps.

As a result of this initial effort to obtain valid information, it was apparent that the necessary data base simply did not exist to answer the questions about the nature and extent of youth camp injuries and illnesses. It was determined that securing such data would require an intensive study of youth camps during at least one complete operating season. The first opportunity for such a study was the summer of 1973.

Plans were developed to conduct a study during June, July and August 1973 in a representative sample of camps throughout the Nation.

Contracting For The Study

Prior to the summer of 1973 the BCEM, the agency delegated the responsibility for the study, was phased out of a major portion of their activities and were therefore unable to perform the investigation as planned. Requests

for Proposals were then issued in March 1973 for competitive bidding by contractors for the conducting of an Investigation of Youth Camp Safety and for the Compilation of State and Local Laws and Regulations Pertaining to Health and Safety in Youth Camps. The responsibility for managing the contractual work, compiling government data and making final recommendations regarding the need for Federal Laws in this field was transferred to the Center For Disease Control in Atlanta, Georgia.

Selection Of A Sample

The contract for the study was granted to Century Research toward the latter part of May 1973. Between that time and the beginning of the camping season, in June, the sample clusters of camps were chosen, camps within the clusters selected and then the operators of these camps were asked to participate. The time was short and was the busiest time of the year for Camp Directors. Some Directors

refused to participate on advice from their lawyers. Some felt there was little benefit for them in a study which might lead to further regulations. A few did not want a sanitarian to inspect their camps and some said they wanted nothing to do with or for the government. A more common reason was lack of time and staff to complete the survey forms which required, in part, detailed recording of all injuries and illnesses during the camp season.

Data Collection

Camp personnel were requested to complete a report on all injuries and illnesses, and some camps did this - while others recorded only "significant" incidents. As would be expected, the definition of "significant" varied from camp to camp. This variety of recording plus the diversified methods of maintaining health records caused the camp investigators problems in obtaining uniform data.

The forms used in the survey to assess the existing environmental conditions and administrative practices were designed to provide

such information as the number and ages of counselors; the number, age and sex of the campers each session; the type of camp (i.e. residential, travel, primitive, etc.); sponsorship (i.e., Girl Scout, Boy Scout, Y.M.C.A., private, etc.); whether the camp was accredited by one or more camping associations; types of permit or licenses the camp is required to have; frequency of inspection if inspected; qualifications and training for counselors; number of staff certified in junior, senior, life-saving or water safety instruction; where children swim; type of water craft available; floatation devices required; whether boating instruction is given to campers; types of vehicles used to transport campers; qualifications of drivers of camp vehicles; what health personnel is available; time it would take to get needed help or to reach a hospital; if emergency transportation is available; medical facilities at camp; if a physical is required of campers; and a rather complete study of the sanitation and physical aspects of the camp.

The limitations of this portion of the study were several: Because the study was conducted by investigators who, for the most part, were unfamiliar with youth camp administration and operation, questions on the forms were not uniformly completed by the investigator. For example, the number of staff certified in junior or senior lifesaving or water safety instruction were compiled in some camps from the total staff population and in other camps from the waterfront staff population only. (Furthermore, no tabulations were made to indicate the ratio of trained waterfront staff to swimmers.) Another example of variation in reporting is the type of vehicles used to transport campers and what qualifications drivers of each type of vehicle were required to have. The answers were varied and apparently not adequate for tabulation.

Limitation Of Tabulation Of Results of Survey

Instead of comparing factors within a specific

camp with major illness or injury incidents to establish possible causes, the facts obtained from each camp were usually grouped geographically or by a "laws" and "comparison" group and compared with one another. Thus, the recording of an outbreak of gastroenteritis in one camp, which in a two-week period affected about 57 people and the subsequent tracing of the cause to a clogged chlorinator in the water supply system, with bacteriological tests showing heavy coliform, was not compared with the environmental survey for that camp.

The simple comparison of this factor which could have reduced the seriousness of the health problem would have provided a basis for determining if the laws in that state adequately dealt with observed problems.

Results were not compared on a state to state basis, so that administrative practices could be compared with the actual laws of that state.

Selection of Comparison Groups of Camps

Much thought was given to the selection of sample camps for the survey. It was finally

decided to select clusters of camps from four groups of states.

1. States determined to have laws regarding camps; (laws)
2. States in a comparison group that were considered to have few, if any, laws regarding camps (comparison);
3. & 4. Geographical groupings of camps in the West and the South-East.

The limitations of this diversion were discovered during the compilation of youth camp laws. It developed that the "laws" group, including Michigan, New Hampshire, and New York, included two states that have youth camp legislation, but relatively few of the regulations considered by the panel of camp experts to be important to the safety of youth in camp. (Less than 50% of the suggested protective regulations.) On the other hand, the "comparison" groups of Wisconsin, Missouri, New Jersey and Maine included one state with excellent regulations but no specific youth camp legislation or mandated inspection and two states which have

an excellent voluntary regulatory program available from State Health Agencies. Some camps in the sample actually were found by NRPA to be certified by the state. The remaining state has very few regulations but in some local areas, including the sample group, quite strict inspections are conducted, especially in the food service areas.

Furthermore, 28% of the camps in the "comparison" group were Scout or Campfire Girl Camps, all regulated and accredited by their parent organizations, and only 17% were sponsored by religious groups which usually were found not to be accredited in any way. The "laws" group, on the other hand, had the reverse situation, with 19% Scout and Campfire Girls Camps and 27% religious groups. This factor would certainly tend to prevent the use of all camps in the "comparison" sample as a control group.

The other two groups are grouped geographically, but each contain such a divergence of State

regulatory requirements that no inferences can be made to the population of a particular section of the country. (West contains Washington, Colorado, Texas and Arkansas; South-East contains Pennsylvania, South Carolina, Georgia, and Florida.)

Statistics were not tabulated on an individual state basis to determine if the camps in states with comprehensive and enforced Youth Camp Regulations differed significantly in administrative practices from camps in states which have few regulations applicable to youth camps.

To summarize the limitations and constraints, the following list must be taken into consideration:

1. A complete list of all youth camps currently operating in the summer of 1973 was not available for the major survey of a sample of youth camps. A list of 5293 resident camps was used.

2. No day camps, travel camps, or troop camps were included in the study.

3. Over 50% of the primary sample of camps were dropped from the study and replaced by other camps.

4. The control established through the use of a "laws" group and a "comparison" group was rendered invalid because of inaccurate initial assessment of existing State Regulations and the significantly higher percentage of accredited camps in the "comparison" group than in the "laws" group.

5. Data from camps was not uniformly recorded, especially in regard to illness and injury data and staff for waterfront activities.

6. Statistics were compiled in such a way as to provide little comparison of the effect regulatory measures (State or agency) had upon the operation of the camps.

7. Supplemental nationwide data on serious injuries or illness in 3,343 camps collected by the government were not analyzed in a manner to be useful in the overall investigation.

8. Data was collected of all injury and illness incidents occurring in the sample rather than only "serious" incidents making the collection and analysis difficult and time-consuming.

9. Contracts for the study were granted far too late in the year (late May) to provide proper preparation and accomplishment of the tasks. Some camps were dropped from the survey because their season was over prior the investigation.

10. The timing of the contracting for compilation of State Laws such that the laws were to have been provided after the study had been completed. (This was circumvented by the Laws Contractor providing a majority of State Laws on their own initiative within two weeks after being granted the contract.)

11. The Act requiring the study and a subsequent report by March 1, 1973 was not approved until late June 1972, the middle of the camping season. After an initial survey and the decision to conduct an intensive camp survey in 1973 by the responsible H.E.W. agency, the Bureau of Community Environmental Management was phased out in June 1973, and replaced by Center For Disease Control. This shift occurred after contractors had been obtained by BCFM and had begun their work.

2.1 TASK I - EXTENT OF PREVENTABLE ACCIDENTS AND ILLNESSES

The illness and injury information obtained by the contractor in the 1973 intensive, on-site survey of 212 resident youth camps was supplemented by the following information obtained by the Government:

(a) Illness and injury data obtained by a letter survey of youth camp associations, sponsors, and camp directors. This survey used the Camp Illness and Injury Summary Form. All youth camps for which addresses were known

were selected for this survey from a master list of camps compiled by the Government, utilizing lists from the American Camping Assoc., the Girl Scouts of the U.S.A., the Easter Seal Society, the Porter Sargent Guide To Summer Camps, the Sierra Club, the New York Times, and a variety of other individual sources.

(b) Newspaper reports of serious illnesses and injuries in youth camps throughout the nation obtained by contract from a clipping service.

2.1.4 Center For Disease Control - Mailing- Methodology And Findings

Injury and illness survey letters were sent by the Government to 7861 camp operators and of these, 3343 forms were completed and returned marked "address unknown". There were 9 deaths discovered in the returned forms. In addition, one more death was recorded from a letter to a Government official, bringing the total number of deaths to 10. Because of definition of serious illness or injury was interpreted in a variety of ways by persons filling out the forms, the reported illnesses or injuries range in degree of seriousness. For the purpose of this study, a

SERIOUS ILLNESS or SERIOUS INJURY is defined as "one in which the camper was sent to a hospital, an emergency room, a physician's office, or a medical facility located on or off the camp site, and was subsequently unable to return to camp because of this injury or illness."

The type of camp, the number of camp sessions, length of each session, number of male and female campers for each 1973 camping session, the number of serious injuries, the number of serious illnesses and the number of deaths for males and females for each session was requested on the form. This data was not compiled for comparison with reported injury and illness, but is on file with the Government. The form sent to camp operators may be found in Appendix A.

- Findings

  Serious injuries reported totaled 1458, or an average of .44 per camp which responded.

  Serious illnesses reported totaled 1223, or an average of .36 per camp which responded.

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Although camp operators were asked to record the number of camp sessions, length of each session, number of male and female campers per session, and the number of serious illnesses and injuries for males and females during each camp session, statistics were tabulated by the Government on only total serious injuries and illnesses per camp. As a result, no analysis was made to establish injuries and illnesses per camper week.

Statistics were kept by state, however, and the resulting rate of incidents of injuries and illnesses by states with well-enforced youth camp safety regulations were compared with the rate of incidents by the states that had no regulations for youth camp safety. This comparison was inconclusive because of the number of uncontrolled variables.

Because of the voluntary nature of the questionnaires, the limited data utilized in the analysis, and the wide breadth of interpretation by camp operators of what constituted

"serious" injury and illness, little useful information was obtained from this source. A state by state analysis of the data received by the government is included in Appendix B .

2.1.5 Newspaper Clippings - Methodology And Findings

Newspaper reports of serious illnesses, injuries and deaths in youth camps were obtained for two of the three months included in the summer camping session. There were 15 deaths noted by this means. No injuries or illness other than those resulting in death were obtained through this service.

Findings

The total number of deaths discovered through newspaper clippings, survey forms, and other sources was 25. Analysis of the data indicates the following causes for these deaths: (Chart found on next page)

Cause	No. of Incidents	Boys	Girls	Adults
Drowning	14	9	2	3
Fall	4	2	2	-
Horseback Riding Accident	1	-	1	-
Tree Stump Fell on Youth	1	-	1	-
Unknown or "Natural"	3	2	1	-
	23	13	7	3
Auto or Commercial Air Crash enroute to Camp (Non-Camp Accident)	2	-	1	1

Camp Deaths By State

California	3	2 Falls, 1 "Natural Causes"
Colorado	1	Unknown - no information
Florida	1	Drowned - Swimming Alone
Louisiana	2	Drowned
Nebraska	1	Drowned
New Jersey	1	Drowned - Jumped from canoe, life jacket not on, was not noticed
New York	4	1 Unknown, 2 Falls, 1 Drowned (Fell from dock, no life jacket, was alone and no one missed him)
Ohio	2	1 Drowned, 1 Hit by falling tree stump
New Hampshire	1	Drowned
Virginia	3	1 Fall From Horse (No Adult Supervision), 2 Drowned
Wyoming	4	All Drowned - Accident in Yellowstone (Small boats crossing lake, hit by storm)

2.3 TASK III - ADEQUACY OF STATE AND LOCAL LAWS

Prior to the enactment of any federal legislation, Congress wished to determine if the present state and local laws pertaining to camps were adequate. The questions that arose from this were (1) Did state or local governments have laws enacted already that were specifically designed to meet the unique "problems" of camps? (2) If there were no specific laws, what state or local laws were applied to camps (if any); were they adequate to provide a safe environment for campers and were they enforced?

2.3.1 Methodology

- Compilation of State and Local Laws Pertaining to Youth Camp Safety

  The compilation of State laws and regulations (for all but 5 states) pertaining to Youth Camp Safety was accomplished by Cordura within two weeks of the start of their contract. This was due to the pre-contract compilation of Camp Laws by Cordura staff who were aware of the time constraints and the need for the contractor for the camp survey to use the laws during the investigation.

In addition to laws and regulations obtained directly from each state, regulations were assembled by Cordura from the California State Law Library and from Federal and State agencies referred to in the State Regulations. In addition, local governments were contacted that might have regulations that be applied to Youth Camps even though the state had no law authorizing the enforcement of such regulations.

In addition to compiling the actual laws, Cordura provided a list of the official name, title, identification, chapter and sections of all laws and all regulations relating to or applicable to Youth Camp Safety for all 50 states and the Dist. of Columbia.

A matrix of state laws was designed noting the existence of: Direct or enabling legislation or no applicable legisation; if the regulations were designed specifically for Youth Camps; required license, permit or registration; fee, required inspection and contagious disease; enforcement procedures, penalties; the names of enforcing agencies;

existing regulations applicable to youth camps in: (1) camp site and facilities, (2) camp personnel (3) program activity safety, (4) camp sanitation, (5) camp health facilities, and transportation, legislation or regulations pending.

Copies of the laws enacted by the states and copies of regulations promulgated from these laws are on file in the Center For Disease Control in Atlanta, GA.

Evaluation Of Contributions, Regulations And Enforcement Procedures By Consultant Panel

A panel of consultants with expertise in the area of Youth Camp Safety, was assembled by the National Recreation and Park Association to assist in the evaluation of contributions, regulations and enforcement procedures. Panel members were selected to represent a wide varicty of camping expertise. (See Appendix C for a list of participants.)

This panel made recommendations concerning the categories which should be included in

camp regulations in order to assure the broadest possible coverage of health, and safety factors. (A list of these categories is in Appendix D.)

Comparison of Laws With Camp Panel Recommendations

It became apparent during the study of selected camps that the study was not going to provide significant data regarding serious illnesses and injuries. Therefore, the study material could not be used to determine if the state laws adequately deal with the observed problems. Therefore, Cordura was requested to assess the compiled regulations for each state against the categories recommended by the camp panel.

Ranking of Categories of Recommended Regulations By Selected Jury

A ranking instrument for the establishment of an objective weighting of youth camp regulations was developed by Cordura. The regulations used in this instrument were those selected by a national panel of camping experts

assembled by the National Recreation and Park Association.

A Youth Camp Safety jury of thirty-nine (39) persons was selected to rank the selected regulations. The jury consisted of all members of the national panel of camping experts, camping specialists from most major youth serving agencies involved in camping, operators of private camps, sanitary engineers from selected states, and specialists in safety aspects for various program areas related to camping. (See Appendix E)

Of the 39 persons contacted, a total of 31 persons participated in the ranking. One person declined to participate because of strong feelings for state's rights in matters of Youth Camp Safety.

Jury members were sent a letter, explaining the project and the task to be done, a set of instructions, and a copy of the ranking instrument. (See Appendix F). The ranking

instrument contained 92 items divided into nine (9) categories of camp health and safety identified by the national panel of camping experts. These categories were (1) Camp personnel (2) Program safety (3) Site and facilities (4) Personal health, first aid, and medical services, (5) Sanitation - Public Health, Food service; (6) Transportation (7) Out-of-camp trips and primitive out-post camping (emanating from a permanent camp site; (8) day camping (9) travel camps.

The jury was asked to rank items within each category and to rank each category in order of importance to the protection of the health and safety of children in youth camps.

The result of the ranking done by the 31 jury members was compiled and a rank order was established for items within each category, and for each category itself. (See Appendix G) This rank order was used to determine the number of states that included top ranking requirements in their regulations and the

number of states which did not include such requirements in their regulations. (See Appendix H).

Many of the 31 jury members expressed their concern in having to rank items that they believed to be of equal importance. To express their concern in a manner which could be utilized in the study, some of these persons assigned the same rank number to several items within the same category.

The rank numbers assigned by each jury member were tabulated for each item within each category. Because many of the items are of equal importance, the resulting rank assigned to each item is not an absolute, but merely an indication of areas considered most important to the health and safety of children in camp by a majority of the jurors selected for this study.

The actual ranking by each juror and the resultant tabulations from which the charts following this page were formulated, appear in the Appendix. Names have been omitted

from the individual scores to preserve confidentiality. (See Appendix I)

2.3.2 Findings

- Assessment of Adequacy of State Laws By NRPA

The National Recreation and Park Association provided the following report regarding their assessment of the adequacy of state laws: "With very few exceptions, state laws relating to camp safety were found to be grossly inadequately. In some states, they were completely nonexistent.

Laws specifically regulating resident camp safety were not inclusive enough to cover all areas of camp safety, e.g., those laws which do provide for basic health and safety considerations in the original construction, grounds and facilities of a resident camp, but make no provision for regulating safety prorgrams or staff requirements.

Other state's regulations allow camps operated by certain types of organizations to be

exempt from adhering to the regulations. Where generalized regulations do exist, resident camps and a variety of other operations are lumped into an all encompassing category. These regulations fall short of providing specific standards necessary for the safe execution of the unique experience and environment of a resident camp. As an illustration, one might consider the usage of outdoor latrines rather than indoor bathrooms. Such outdoor sanitary facilities can be implemented in a safe and healthy way, but no provisions for such use are made in health and safety regulations designed to govern the operation of general food serving or resident establishments such as restaurants and rest homes. Another specialized experience might be dining family style in a rustic building constructed with rough hewed boards or logs. As mentioned previously, a requirement restricting family style dining and requiring wash down walls would be detrimental to the total positive camping experience.

It is concluded, then, that camping being a completely unique experience requires very specialized laws to regulate health and safety standards without detracting from the uniqueness of the experience. In most cases regulations of this type do not exist."

Assessment Of State Laws And Regulations By Camp Jury

The categories ranked most important by the jury (in order to importance)were:

Camp Personnel - Includes such things as training for counselors in their specific job (e.g., aquatics or riflery); the ratio of counselors to camper; the age requirements for counselors.

Program Safety- Includes such things as supervision of program activities by qualified staff members; the safety education of staff and campers in all program areas; skill and use of and care of equipment; the operation of special program activities such as swimming, boating, canoing, riflery,

archery, horseback riding, and the use of natural bathing areas according to the standards established by nationally recognized groups such as the American Red Cross.

Sanitation, Public Health, and Food Service

Includes such things as a safe water supply; food protection and handling; food storage and refrigeration; sewage disposal; sanitation of dishes and utensils and many more.

Personal Health, First Aid, Medical Services

Includes such things as a qualified health supervisor of the staff; first aid training for staff and campers; a doctor on call and emergency transportation available at all times to transport the camper to a doctor or to the hospital

It was indicated by the jury that types of camping other than resident camps and their main facilities would be considered separately. A listing of these types and regulations considered most important for each type follows:

Out-Of-Camp Trips and Primitive Out-Of-Main Camp Trips

Whether on the camp property or in a completely different site, but emanating from the main resident camp as a part of the regular program. Considered most important in this type of camping was Personnel, Program Safety, Sanitation, (water, toilets, sewage, garbage, dish sanitation, and Food (source, preparation, service and nutrition.)

Day Camping - The jury ranked most important the categories of Personnel, Program Safety, Sanitation, and Transportation.

Travel Camps. Ranked most important for this type of camp were Personnel, Program Safety, Transportation, Sanitation, Health and Medical.

Jurors were asked to comment on legislative factors relevant to Youth Camp Legislation. They were asked to answer yes to items that they believed to be necessary for State Youth Camp Regulatory Measure, no to items they felt were not necessary, and undecided on items where they had no opinion.

Summary of Opinions of 31 Jurors

25 felt that there should be direct or enabling State Legislation that specifically controls the operation of camps by law or that permits the promulgation of regulations that have the effect of law. Three felt there should not be any legislation.

All 31 jurors felt there should be an annual license, permit or registration for camp. When asked to designate their preference, 19 favored a license, 7 favored a permit, and 2 favored a registration.

27 jurors stated that they felt there should be an annual inspection, one favored no inspection, 2 were undecided, and 1 favored inspection, but not annually.

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When asked if there should be an inspection for each operation during the camp season when the camp is being used by different operators, 18 were in favor, 7 opposed, and 6 had no opinion.

The question of an annual fee was divided into three parts: (1) a fee charged for each camp site (2) a fee for each operation when used by different operators, and (3) a fee for each trip or travel camp. A majority of the jurors were opposed to charging a fee, especially for each operation and each trip or travel camp.

22 jurors opposed a Federally administered program for travel camps, but when asked about state administered programs for travel camps, only 11 were opposed while 16 were in favor.

A large majority of 26 persons approved of a penalty clause, one opposed it and four were undecided.

A large majority of 26 also favored reporting requirements for camp related death, serious injury and serious illness, one was opposed and four were undecided.

The majority (27) felt that a single state agency should be responsible for the enforcement of camp regulations.

To summarize the trends indicated by the jury, states should have legislation specifically designed for youth camps with regulations that have the effect of law. An annual license would be required for each camp, based upon an annual inspection of the camp by the State. If several operations are held on the same site, inspections would be conducted for each operation. There would be no fee charged by the State for this license or for the required inspections. There would be a penalty clause for operators who refused to comply with the regulations and the single state agency responsible for the

enforcement of camp regulations would have the power to envoke the penalty clause, if it was found to be necessary. The single state agency would also be responsible for the coordination of all other regulatory agencies (fire, water, sanitation, child care, etc.) which might be involved in regulatory duties related to camps. In other words, the camp operator would be licensed by one agency who might call upon other agencies on a consultation basis only. There would be a system in the State for the reporting, within a specified time limit, all camp related deaths, serious injuries and serious illnesses, and records would be maintained by the state in a retrievable manner.

There would be no Federally administered program for the regulating of travel camps, but states would work out some sort of regulation which would not impose a hardship on youth agencies which sponsor hundreds of troop

camp trips which fall under the definition of travel camping.

States would provide a means for camp administrators within the State to participate in the writing of regulations which will affect their operation. Adequate training would be provided all State inspectors of camps in the concepts of the purpose and objectives of camping for youth and in the purpose of the inspections, as a means of educating the operator in safe and healthful practices rather than to "catch" the operator in an infraction.

Assessment of State Laws By Cordura

The purpose of any state law or of the regulations promulgated from that law is to provide order, protection, or a standard method of operation to safeguard the persons of that state. One of the questions asked in this study of Youth Camp Safety was, "Do existing State and local laws adequately deal with the safety of campers in Youth Camps?"

Long and careful research in this matter has been conducted by groups and individuals since 1920. Through much trial and error, certain safeguards were developed and incorporated into the normal standard operating procedures of many camps in the nation. Years of work have gone into the development of minimum health and safety standards designed both to safeguard the health and safety of children and to provide a fun and adventure filled growth experience for the child. Outstanding contributors in this field since 1920 have been the Girl Scouts of U.S. A., the Boy Scouts of America and the Y.M.C.A., joined in later years by the American Camping Assoc., Campfire Girls and other groups and individuals involved in youth camping.

A basic list of categories for minimum standards was developed in August 1973 by a panel of camping experts assembled by National Recreation and Park Association.

These same basic standards can be found in the many pamphlets published by camping agencies and safety oriented private agencies which are published in the Appendix of the NRPA report. In other words, the basic health and safety standards commonly used by all Girl Scouts, Boy Scouts, Camp Fire Girls, YMCA and ACA accredited camps plus numerous other associations of private and independent camps are those the panel used in compiling their list of factors which they felt were essential to the health and safety of youth in camps. It is these basic factors that have been used by Cordura as a comparison base in the assessment of the adequacy of regulations currently existing in each state which could possibly be applied to youth camps.

Over one hundredd and nine (109) regulatory areas were listed as being important to safeguard youth in camps. The laws and regulations of the fifty states and the

Dist. of Columbia were reviewed to determine if they had any of these areas. The applicable regulations of each state were subjectively rated by the Cordura staff assigned to this project. A descriptive state matrix of the ratings may be found in Appendix J.

It is important when assessing the adequacy of laws and regulations promulgated from these laws, to not only evaluate the adequacy of the regulations, but to know if the regulations, by law, can be enforced. It is also necessary to be able, under law, to inspect the camp at least once during the summer operation and hopefully, to inspect it before the camp receives its first campers.

Taking all these factors into consideration, which states actually have regulations that are designed for youth camps; meet at

least 50% of the basic regulatory areas identified by the camp panel, are measureable so that both the inspector and operator know what is required for compliance; and have a means for the state to identify all existing camps; have the authorization to inspect camps at least once a year, and the power to enforce the regulations? It would seem that these states would be considered to have "adequate" regulations, at least on paper.

There are only four states which meet the criteria stated above for resident camps. These states are: California, Colorado Connecticut and Michigan. Of these states, all but one, Connecticut, also regulate primitive out-post and out-of-main camp trips, day camps and travel camps. Connecticut also regulates all except travel camps. Most of these states also have a system for recording and filing serious injury, illness and deaths which are camp-related. At least three (3) of these states, California, Colorado, and Michigan maintain lists of all camps operating in the state

which are available to the public, upon request. These same states also provide a compilation of regulations which are readily available to a camp operator. The same is true of Illinois, Massachusetts, Nebraska, New Hampshire, New Jersey, North Carolina, Rhode Island, So. Carolina, and West Virginia.

What states nearly meet the criteria for adequacy? Maine and New Jersey have outstanding standards for camping, but inspection and certification are done on a voluntary basis only. Wisconsin has an impressive set of regulations but have no legal authority to inspect camps or enforce the regulations. Several states namely Massachusetts, Rhode Island, Tennesse, and West Virginia have quite adequate regulations in most areas, but do nothing about camp personnel - the category considered to be of greatest importance to safety by the jury. The State of Texas passed legislation in July, 1973, provided for a youth camp safety Act which follows closely the bills before

Congress and would certainly protect youth in camps as soon as regulations are promulgated to carry out the mandates of the law.

In summary, there are currently 28 states with legislation specifically for Youth Camp Safety. Of these states, 21 require an annual inspection. Of all 50 states and the District of Columbia, there are only 8 states which regulate over 50% of all recommended categories for resident camps. Of all the states, there are 4 which have adequate regulations which are enforced. There are 32 states of the 51 states which regulate less than 25% of the recommended areas.

2.3.3 Discussion

It appears from the foregoing assessments that present state laws governing youth camps are inadequate and do not provide the type of protection that parents have a right to expect when they send their children to camp.

Some states, which will not be identified in this report, have regulations applicable to youth camps which if enforced, would seriously hamper the objective of camping or force camp operators out of business. It is this kind of of legislation that competent and professional camp operators fear. These regulations are most often lifted from related public operations such as restaurants, hotels, trailer courts, labor camps, etc. These regulations would require such things as hot and cold running water in all lavatories in toilet facilities, with no provision for primitive camps with pit privies and cold water taps. Because of a requirement for "washable walls" in kitchens, one state required a camp operator to build walls around an open-air screened kitchen, so that they could be washed. One state has prohibitive restrictions and regulations for resident camps, but a director who nails up a sign saying Primitive Camp, has only the water supply and sewage disposal inspected. Many of the camps with prohibitively strict regulations for sanitation have

no regulations regarding personnel.

If regulations are written by persons not familiar with camp operations, the effect on camping could be disasterous. Also, if inspectors are not well trained in the purpose and objectives of camping, of the concepts rather than the letter of protective regulations, then the best of regulations could be a nightmare to a camp operator.

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3. STATE CAMP SAFETY LAWS:
   MICHIGAN
   MINNESOTA
   NEW JERSEY

STATE OF MICHIGAN

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF SOCIAL SERVICES

300 S. CAPITOL AVENUE, LANSING, MICHIGAN 48926

R. BERNARD HOUSTON, Director

1973

CHILDREN'S CAMP ACCIDENT OR ILLNESS REPORTS

Received by the
Department of Social Services

ACCIDENTS

Cuts requiring stitches	14
Fractures	11
Sprains	12
Other (broken tooth, bruises, etc).	56
Total	93

ILLNESSES

Appendicitis	1
Asthma Attack.	1
Swelling in eye.	1
Earache.	2
Headache	3
Shortness of breath.	3
Upset Stomach.	2
Total.	13

FATALITIES

NONE

J. McMillin Feehery
Program Manager
Children's Camps
June 24, 1974

MICHIGAN
THE GREAT LAKE STATE

41-208 O - 74 - 32

STATE OF MICHIGAN

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF SOCIAL SERVICES

300 S. CAPITOL AVENUE, LANSING, MICHIGAN 48926

R. BERNARD HOUSTON, Director

ACCIDENTAL DEATHS IN CHILDREN'S CAMPS

(1964 thru 1973)

DROWNINGS:	
Swimming	5
camp waterfront (lake)	2
away from camp waterfront	2
camp pool	1
Boating	2
HORSEBACK RIDING	1
FALL FROM CLIFF	1
TRUCK ACCIDENT	1
BURIED IN SAND	1
Total	11

MICHIGAN
THE GREAT LAKE STATE

CAMP WATERFRONT (LAKE)

A ten year old girl drowned in a camp swimming area. She was missing on buddy check and found beyond the lemon line dividing the Beginners Area and Intermediate Area. She was a nonswimmer and somehow slipped into the deeper area. The Water Safety Instructor was on a raft within 10 feet of where she was found. No one saw her nor did anyone hear any cry for help.

A ten year old girl lost her life as a result of a submersion in two feet of water. The submersion occured at 4:00 p.m. and she died at 12:30 a.m. She was underwater for less than 30 seconds and when rescued, she resumed breathing normally and was conscious. This child had a history of epilepsy, was a hydrocephalic, and a nonswimmer. The coroner listed the death as drowning. There was a Water Safety Instructor within 25 feet of the submersion.

A six year old boy was found in the deep end of a pool. The pool was fenced in and the children had all left the pool and were dressing. Witnesses said they saw the boy in the dressing area outside the fence. The guards were at the shallow end of the pool waiting for the next class and one guard walked down to the deep end and saw the boy on the bottom. No one knows how the boy got back over the fence and into the pool. He was a nonswimmer.

2

AWAY FROM CAMP WATERFRONT

A boy drowned while on a trip. The group went swimming at a public beach and the boy was not allowed to go swimming with the group because he was a nonswimmer and subject to epileptic seizures. While on shore with his buddy he said, "Don't tell the counselor I am going in anyway". He was found under a raft in 8 feet of water.

A boy drowned while swimming with four other boys and two counselors at a gravel pit. The camp management had not approved the gravel pit for swimming. The water dropped off sharply and the boy, a nonswimmer, was found less than 20 feet from shore in 15 feet of water. One of the counselors, a Senior Life Saver, said they all were coming out of the water together and when he looked around the one boy, a nonswimmer, was missing.

BOATING

AWAY FROM CAMP BOATING AREA

Two boys found an old boat which had been washed ashore and hid it in the bushes near their campsite. A couple of days later they slipped away unnoticed by their counselor and took the boat out with no life jackets or preservers. The boat sank 25 yards offshore. One boy swam to safety, the other boy, a nonswimmer, drowned.

3

A boy who was a nonswimmer used another boy's buddy tag so he could go out in a canoe. He fell out of the canoe reaching for a line and drowned. He was not wearing a life jacket. There was another boy in the canoe and other canoes nearby. He never came to the surface and drowned in 18 feet of water.

HORSEBACK RIDING

A boy, who was an experienced rider, died of a head injury when he fell from a horse. While the horse was in motion he leaned over to pick up a jacket and the stirrup broke. Besides being an experienced rider (for 7 years), he had a riding horse at home and brought a new saddle to camp.

FALL FROM CLIFF

On a Sunday morning two boys left the camp without permission and went to an area which was out of bounds to campers about a mile from camp. One boy, the son of the camp doctor, was fatally injured when he lost his footing, slid down to the edge and over a 200' cliff to the shoreline of Lake Superior.

TRUCK ACCIDENT

Two counselors and 8 boys were riding in a covered army type truck when the truck swerved off an expressway and rolled over. One boy was killed. The other boys were treated at the hospital and released. The counselor driving couldn't explain what happened nor could the sheriff's department. There was no traffic, the pavement was dry and the road was straight.

BURIED IN SAND

Two boys were digging a garbage pit near Lake Michigan, adjacent to their troop campsite. The soil near the lake was very sandy and the pit caved in burying one of the boys. By the time rescuers reached the boy he had died from suffocation.

RULES FOR LICENSING CHILDREN'S CAMPS IN MICHIGAN

State of Michigan
Department of Social Services
300 S. Capitol Ave.
Lansing, Mich. 48926

DSS Publication 98 (Rev. 8-73)
Previous editions obsolete

DEPARTMENT OF SOCIAL SERVICES

GENERAL RULES

Filed with Secretary of State, September 10, 1973

These rules take effect 15 days after filing with the Secretary of State

(By authority conferred on the director of social services by section 6 of Act No. 280 of the Public Acts of 1939, as amended, and section 2 of Act No. 47 of the Public Acts of the First Extra Session of 1944, as amended, and sections 451 and 453 of Act No. 380 of the Public Acts of 1965, as amended, being sections 400.6, 722.102, 16.551 and 16.553 of the Michigan Compiled Laws.)

Part 10. Children's Camps are added to the general rules of the department, being R 400.1 to R 400.907 of the Michigan administrative code and appearing in the 1957 to 1972 Annual Supplements to the Code, to read as hereinafter provided.

Rules (1) to (35) of subpart H, Summer Camps for Children, of part 3, Inspection and Licensing, of the general rules of the department, being R 400.231 to R 400.238 of the Michigan administrative code, rules (1) to (12), (19) to (21), and (30) to (35) appearing on pages 1494 to 1496 of the 1960 Annual Supplement to the Code, rules (13) to (18) appearing on page 4745 of the 1968 Annual Supplement to the Code, and rules (22) to (29) appearing on pages 3277 and 3278 of the 1964-65 Annual Supplements to the Code, are rescinded.

R 400.231 - R 400.238. Rescinded.

PART 10. CHILDREN'S CAMPS

A. GENERAL PROVISIONS

R 400.1001. Definitions A to C.

Rule 1001. (1) "Adult" means a mature person aged 18 years or older.

(2) "Aquatics guard" means a person aged 17 years or older on duty at a waterfront for guarding and rescue purposes.

(3) "Aquatics supervisor" means an adult in charge at a waterfront supervising swimming and watercraft activities.

(4) "Buddy system" means a pairing of campers to facilitate accounting of all children.

(5) "Campsite" means land including natural features where the main camp facilities are located.

(6) "Children's camp" or "camp" means a residential, day, troop, or travel camp conducted in a natural environment for 5 or more school age children apart from their parents, relatives or legal guardians for 5 or more days in a 14 day period. A camp provides care and supervision for groups of children for usually no more than 12 weeks. Special kinds of camps are:

(a) "Resident camp" which means a camp which provides a minimum of 24 hours a day care for children at 1 campsite.

(b) "Day camp" which means a camp providing care for children during all or part of the day but less than 24 hours a day.

(c) "Travel camp" which means a camp which is mobile and provides not less than 24 hours a day care for children at various campsites.

(d) "Troop camp" which means a camp which provides not less than 24 hours a day care for organized groups of children within a parent council of the boy scouts, girl scouts, or camp fire girls.

R 400.1002. Definitions D to V.

Rule 1002. (1) "Department" means the state department of social services

(2) "Facility" means a structure including furnishings and installations on a campsite for living and program purposes.

(3) "School age" means children aged 6 years on or before December 1 of the camp year and under age 17 years.

(4) "Vehicle" means a carrier used in transporting children on public highways to and from camp or other places incidental to the camp program.

R 400.1004. Licensing and evaluation

Rule 1004. (1) A person, firm, corporation, association or organization shall not establish a camp unless licensed by the department.

(2) Application for a camp license shall be made on forms provided by the department.

(3) A license shall be in force for the period indicated on the license which shall be not more than 1 year.

(4) Willful and substantial failure to comply with any provision of Act No. 47 of the Public Acts of the First Extra session of 1944, as amended, being sections 722.101 to 722.108 of the Michigan Compiled Laws, or with these rules, constitutes sufficient cause for denial or revocation of a license.

(5) The department at any time may evaluate the conditions of a camp.

(6) An individual or organization shall satisfy the department that there is sufficient financial support to operate and maintain a camp in accordance with these rules and the camp goals and objectives. Financial records shall be made available to the department upon request.

(7) A person, on the grounds of race, color, religion, or national origin, shall not be denied the benefit of, or be subjected to discrimination in a camp. A camp operated by a recognized church may give priority to its own constitutency.

R 400.1005. Site, plans, facilities and equipment.

Rule 1005. (1) The location of a camp shall not present a fire, health, safety, or social hazard. The main camp facilities in a new camp shall not be divided by a major public highway or railroad.

(2) Camp structures and facilities shall comply with state and local bu lding and zoning codes. Before construction,plans for a proposed ch ldren's camp, or major changes in an existing camp building, shall be submitted for review to the department, the fire marshal division of the department of state police and the county health department. Approval of a license will be based on the recommendations of these agencies.

(3) In new construction, a structure containing sleeping quarters in a re:ident camp shall be separated from all other structures by a distance of not less than 25 feet.

(4) In a resident camp each child shall be provided with not less than 35 square feet of floor space in sleeping quarters and a comfortable separate bed. If tents are used as permanent sleeping quarters not less than 30 square feet of floor space shall be provided for each camper. There shall be not less than 2 feet of space between the sides of each bed. A camper shall not sleep in a triple bunk nor sleep in the same room with children of the opposite sex. Facilities shall be provided in sleeping quarters for each camper to store clothing.

(5) A room, tent, or building to serve as a health center shall be maintained on the campsite for the temporary isolation and treatment of sick and injured members of the camp community. This facility shall be protected from flies and insects; be located to insure privacy and quiet; and not located in or directly off the kitchen. It shall include first aid equipment and medical supplies deemed necessary by the directing physician for the health and welfare of the camp.

(6) Equipment used in the camp program shall be of good quality and not present undue risk to children. Power equipment, especially that used for maintenance of the camp shall not be stored, operated or left unattended without proper safeguards in camper areas.

R 400.1007. Staff.

Rule 1007. (1) A camp shall have a written statement of personnel policies and practices as they affect both the camp and staff. Staff members shall be informed of these policies and practices.

(2) A camp shall have a written job description of each staff classification.

(3) The camp management shall ascertain and have on record information attesting to the character, integrity and ability of each staff member to perform the tasks required of his position.

(4) A camp director shall be not less than 21 years old and have 2 years of experience working with children. The director shall be knowledgeable in camp administrative practices and have not less than 1 season of leadership experience in an organized children's camp or related activity.

(5) Hazardous camp activities such as aquatics, archery, horseback riding, and riflery shall be conducted by a qualified adult activity specialist capable of implementing safety standards established by the department. He shall also have training or experience in conducting the activity.

(6) An adult leader shall be responsible for the care and supervision of every 10 children in the camp. The camp director shall not be included in this ratio in camps servicing over 50 children.

R 400.1008. General care of children.

Rule 1008. (1) Policies and practices for discipline of a child shall be clearly stated and furnished in writing to all employees of the camp. A child shall not be deprived of food, isolated or subjected to corporal punishment or abusive physical exercise as a means of punishment either by staff or by another camper.

(2) The camp shall offer opportunities for children to develop an appreciation and understanding of their natural environment. Activities shall be provided which are conducive to the learning of skills, increase of knowledge, improvement of health and development of character.

(3) Reasonable grouping according to age and the capabilities of each child shall be observed in all activities including contact sports.

R 400.1010. Health

Rule 1010. (1) A camp medical program shall be under the direction of a physician and consultation for medical treatment shall be readily available. A written arrangement for emergency medical treatment shall be made with a hospital, clinic or doctor's office as close as possible to the camp where children can be taken in case of serious injury or illness.

(2) The health staff of a resident camp shall have on duty in residence a licensed physician; or a registered nurse or licensed practical nurse complying with the rules of the state board of nursing;or a camp health director certified by the American camping association.

(3) The health staff of a day, troop, or travel camp shall have on duty a licensed physician; or a registered nurse or a licensed practical nurse complying with the rules of the state board of nursing;or a camp health director currently certified by the American camping association; or a first aider currently certified by the American red cross.

(4) A bound medical log listing date, name of patient, ailment, and treatment prescribed shall be maintained at the health center. If an injury or illness is judged to be serious, the camp physician shall be consulted immediately, and the parents or guardians when the patient is a child notified as soon as possible.

(5) A camp shall have a written outline of daily procedures for health surveillance. If a child or staff member is suspected of having a communicable disease he shall be suitably isolated.

R 400.1011. Physical examinations.

Rule 1011. (1) A child at the time of admission to a resident or travel camp shall submit a written report of a physical examination performed by a qualified physician within the preceding 12 months. He shall also have current protection against diphtheria, tetanus, poliomyelitis, measles and rubella, or a statement from a physician that immunization is in progress. If there is religious objection to physical examination or immunization, a child shall submit a written statement signed by the parents or legal guardians to the effect the child is in good health and they assume the health responsibility for the child while in camp with the understanding they will

be notified immediately if anything unforeseen occurs. This statement shall also include a provision that if the camp is unable or does not have the time to locate the persons designated to be notified in case of emergency, camp authorities may take such temporary measures as they deem appropriate.

(2) A paid employee of a camp who comes in contact with children in the course of his work shall submit a report of a physical examination performed by a qualified physician and a report of the results of a tuberculin test, both conducted within 12 months before employment in the camp.

(3) A regular volunteer who comes in contact with children in the course of his work shall submit a report of the results of a tuberculin test conducted within 12 months before employment in the camp.

(4) Required physical examination records shall be on file in the camp for review by the staff of the department of public health and the department.

R 400.1013. Nutrition and food service.

Rule 1013. (1) A camp shall establish written policies for its nutrition and food service program. These policies shall include meal patterns, meal hours, type of food service, staff responsibilities during the time food is served, special diets, and administration of the food service program.

(2) Food provided by the camp shall be of sufficient quantity and nutritional quality to provide for the dietary needs of each child.

(3) Menus shall be planned at least a week in advance and shall be dated as to the week of use. The current week's menu shall be posted in the food preparation area. Food substitutes shall be noted on the menus in writing. After use, the menus shall be kept on file for the period of the camping season.

(4) A file of recipes, appropriate for the size of the camp and the age of the children, shall be maintained and used by personnel for the preparation of foods listed on the menus.

(5) Mealtimes shall be scheduled to meet the children's needs and spaced so there are no excessively long periods without food. At least 3 meals shall be served each day in a resident, troop or travel camp.

(6) Meals shall be prepared to preserve nutritive value, flavor and appearance and shall be served in an appetizing and sanitary manner. Meals shall be prepared as close to serving time as possible and in forms that are appropriate to the developmental level of the children.

R 400.1016. Waterfront staff.

Rule 1016. (1) An aquatics supervisor in a resident camp or day camp for swimming programs shall be currently certified as an American red cross water safety instructor, a YMCA aquatics instructor, or a boy scouts of America national aquatics instructor.

(2) The aquatics supervisor in a troop or a travel camp who supervises swimming programs shall be currently certified as an American red cross senior lifesaver, a YMCA senior lifesaver, or a boy scouts of America lifeguard.

(3) The aquatics supervisor in any camp who supervises wading or watercraft programs shall be currently certified as an American red cross senior lifesaver, a YMCA senior lifesaver, or a boy scouts of America lifeguard.

(4) When swimming or watercraft activities are in progress, the aquatics supervisor shall be in attendance supervising the program.

(5) The aquatics supervisor is responsible for the procedures of waterfront supervision and they shall be strictly enforced. The aquatics staff shall not engage in recreational swimming or boating while on waterfront duty.

(6) The aquatics supervisor and 1 aquatics guard shall be on duty for 20 or less children in the water. One additional aquatics guard shall be on duty for every additional 20 children or fraction thereof.

R 400.1017. Swimming areas.

Rule 1017. (1) A swimming area shall be maintained in a clean and safe condition, free from rocks, holes, and hidden dangers. Any known hazard in the vicinity shall be properly safeguarded and posted.

(2) The permanent swimming area of a resident camp or a day camp shall have a delineation of areas for non-swimmers, intermediates, and swimmers, in accordance with the standards of the American red cross, YMCA, or boy scouts of America.

(3) Lifesaving equipment shall be provided at a swimming area and placed so it is immediately available in case of an emergency. The equipment shall be kept in good working order and include a bell or whistle, 2 assist poles and a ring buoy.

R 400.1018. Swimming procedures.

Rule 1018. (1) American red cross, YMCA, or boy scouts of America tests shall be used to determine each child's swimming ability. Children shall be confined to an area equal to the limits of their swimming skills or an area requiring lesser skills for which they have been classified.

(2) A method of supervising and checking bathers shall be established and enforced. Recommended methods are the check or buddy board, the buddy system, the colored cap system or any combination of these. The system used shall be supervised during swimming periods by a member of the aquatics staff and checks shall be conducted not less than every 10 minutes. A written "lost swimmer" plan shall be established and all staff shall know exactly what their duties are in case of an emergency at the waterfront.

(3) Swimming is prohibited at sites other than the permanent camp waterfront without prior approval of the camp management. The activity shall be supervised by the aquatics supervisor assisted by 1 aquatics guard for every 10 children or fraction thereof in the water. The buddy system shall be used and buddy checks shall be conducted not less than every 5 minutes.

(4) Swimming is prohibited during the hours of darkness in lakes, rivers or pools without prior approval by the department.

R 400.1019. Watercraft and waterskiing.

Rule 1019. (1) Watercraft activities shall be conducted during daylight hours and supervised by the aquatics supervisor. A coastguard approved life preserver shall be provided for each occupant of a watercraft. A non-swimmer shall wear a vest-type coastguard approved life preserver and not be permitted in a sailboat unless accompanied by a counselor. A camper shall wear a vest-type coastguard approved life preserver before entering and while in white water or on a lake when the water is rough or while waterskiing.

(2) During a watercraft activity period, a lifeguard shall patrol the watercraft area in a lifeboat. A watercraft docking area shall not be in the swimming area.

(3) The swimming area shall not be used for the launching or stopping of waterskiers.

R 400.1023. Vehicles and drivers.

Rule 1023. (1) A vehicle in good running condition shall be available at all times for use in emergency situations.

(2) A vehicle used for transporting children shall be capable of passing the department of state police vehicle inspection.

(3) A truck shall not be used as a means of transporting children from their homes to camp and vice-versa except in the cab.

(4) At least 1 adult in addition to the driver shall ride with the children being transported in a truck or bus on a public highway.

(5) Children shall not be transported on a public highway in:

(a) A trailer.

(b) A vehicle when an object or person obscures the driver's view ahead, to the sides and rear, or interferes with his free and easy movement to accessories required for emergencies.

(c) A truck unless sitting on the floor or on seats or benches securely fastened to the truck floor.

(d) A truck with sides or tailgate lower than 36 inches.

(6) The driver of a camp vehicle carrying children shall be an adult.

(7) A person hired specifically to drive a vehicle to transport children or if operating a vehicle carrying more than 12 children shall possess a valid chauffeur's license.

R 400.1028. Records and reports.

Rule 1028. (1) Records of personal data for each child shall be kept at camp when in session and shall include as a minimum: the child's name, age and address; the parent's or guardian's name, address, telephone number and where they or their designees may be reached in case of emergency; and the dates of admission and release.

(2) Written emergency procedures shall be provided at a camp for fire, tornado, serious accident, illness or injury and a lost camper. Each member of the camp staff shall be informed of his duties in case of an emergency.

(3) The camp management shall make reports to the department as may be required to insure that licensing rules are being met.

(4) A written report on forms furnished by the department shall be submitted within 48 hours to the department by the camp management regarding a death of a child or staff member; and a serious camper accident or illness which requires hospitalization or being sent home.

(5) A change in the camp location, dates of operation or cancellation, shall be reported to the department before the change.

R 400.1029. Sanitation and fire hazards.

Rule 1029. The department may require a camp to correct or eliminate any specific condition not described in these rules but which it deems necessary for proper sanitation or fire protection at the camp.

R 400.1030. Modification and waiver of rule.

Rule 1030. (1) Any person or his authorized agent, confronted with practical difficulties in carrying out the strict letter of any rule, may apply to the department in writing for a modification thereof, and when such modification involves subpart C of these rules, the local health department having jurisdiction shall be furnished with a copy. Only a modification that will not constitute a definite hazard to life or property will be considered. The decision of the department including the particulars of the application, shall be entered upon the records of the department and a copy thereof sent to the applicant.

(2) The department may waive temporarily any rule to allow for experimentation and demonstration of new and innovative approaches to a camp program.

B. FIRE SAFETY PROVISIONS

R 400.1031. Construction.

Rule 1031. (1) A new building and a conversion of an existing building, if multi-story shall be of minimum 1 hour fire resistant construction, unless the construction is of solid or laminated wood timbers not less than 3 inches in thickness. If 1 story, construction may be less than fire resistant if it complies with other provisions of this subpart.

(2) An existing licensed camp may be certified for continued use, if it complies with other provisions of this subpart for existing facilities.

R 400.1033. Interior finishes.

Rule 1033. (1) The alphabetical classification of finish materials is for flame spread, fuel contribution, and smoke development as determined by the tunnel test in accordance with NFPA 255-1972, ASTM-E-84-1968, or UL-723-1973 and grouped as follows:

CLASS	FLAME SPREAD	FUEL CONTRIBUTED	SMOKE DEVELOPED
A	0-25	0-35	0-50
B	26-75	36-75	51-125
C	76-200	76-200	126-200

(2) The same alphabetical classification is used for combustibility of prefabricated accoustical tile units only, under federal specifications SS-A-118B-1958.

(3) The documents referred to in subrules (1) and (2) may be purchased from the department of social services, 300 S. Capitol Avenue, Lansing, Michigan 48926, or NFPA 255-1972 from The National Fire Protection Association, 60 Batterymarch Street, Boston, Massachusetts 02110 at the cost of $1.00, ASTM-E-84-1968, from the American Society for Testing and Materials, 1916 Race Street, Philadephia, Pennsylvania 19103 at the cost of $1.50, UL-723-1973 from Underwriters' Laboratories Incorpoated, 207 East Ohio Street, Chicago, Illinois 60611 at a cost of $1.00 and SS-S-118A-1972 which may be purchased from Specifications Sales (3FRSBS) Building, 197 Washington Navy Yard, General Service Administration, Washington, D.C. 20407 at a cost of $.10.

(4) In new construction, additions, and conversions, interior finish classification shall be that of the basic material used without regard to subsequently applied paint or other covering in an attempt to meet the classification. Such basic material shall be minimum class "B" in means of egress and minimum class "C" in other areas.

(5) Paper, cardboard, asphalt paper, or other highly flammable material shall not be used for the interior finish of a building.

(6) Where a sleeping occupancy is maintained on a second floor or over a basement area, the ceiling of the first floor or basement shall be protected with 5/8 inch Underwriters' Laboratories listed gypsum wallboard or any other proven assembly of materials that will provide a minimum 1-hour's resistance to fire, unless such construction is of solid or laminated wood timbers not less than 3 inches in thickness and installed so as to

be smoke tight. A loft above ground level not furnished with escape access directly to the ground shall not be used to house campers.

R 400.1035. Means of egress.

Rule 1035. (1) "Means of egress" means the entire way and method of passage to free and safe ground remote from a building. A means of egress shall be maintained in unobstructed, easily-traveled condition at all times. Exposure to inherent hazards of the building, such as heating plant, kitchen, flammable storage or other similar conditions is not permitted. Furniture, equipment and utility materials shall not be stored or maintained in a location or position which they are likely to fall into, be pushed into, or be obstructive in any way to means of egress.

(2) A building with an occupancy of more than 12 persons including staff shall be provided with at least 2 separate and independent means of egress located as far apart as practical, and in no case less than 50% of the longest dimension of the building. Each door shall be hung to swing in the direction of egress.

(3) An occupancy above the first floor shall be provided with 2 separate and independent means of egress, so located that all persons are located between approved exit facilities. An exitway shall lead to an approved outside fire escape or to an interior stairway enclosed with an assembly of materials affording substantial protection from fire and leading directly to the outdoors at grade.

(4) A required exit from a facility for an occupancy of more than 25 persons, or where the exit is not readily visible to the occupants, shall be designated by an illuminated exit sign. Directional exit signs shall be installed where needed.

(5) Lighting shall be provided for a stairway, corridor and fire escape that constitutes a required means of egress. In new construction or remodeling, the lighting required by this rule shall be installed on separate circuits in non-flexible metallic conduit and fused ahead of the main switch or disconnect.

(6) An assemblage area, such as a recreation room, dining hall, or chapel shall be maintained and arranged in accordance with the Regulations Governing Places of Public Assemblage promulgated pursuant to Act No. 207 of the Public Acts of 1941, being MCLA 29.3a et seq, which may be obtained from the fire marshal division of the department of state police. Each door from a room occupied by campers shall enter a corridor between exits or there shall be direct egress to the outside from each room.

R 400.1037. Exit doors and stairways.

Rule 1037. (1) A required exit door shall be a side-hinged, swing door only. In new construction an exit door shall be not less than 36 inches wide. A door, forming part of a means of egress where door hardware is used, shall be of a type that is nonlocking against egress and operable with a single motion. The use of hooks and eyes, bolts, bars, and similar devices is prohibited on a door provided for exit purposes or designated as an exit.

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(2) An outside stairway when used as part of a means of egress shall be protected by closed walls directly under the stairway and for a distance of 6 feet in all other directions. Windows may be allowed within this area if they are stationary, and are of steel sash and glazed with wired glass of at least 1/4 inch thickness.

R 400.1041. Fire warning and extinguishing equipment.

Rule 1041. (1) In an existing building housing more than 25 persons, an electrical or manual fire alarm system shall be established and maintained. In new construction an approved closed circuit, self-supervised, fire alarm system shall be installed.

(2) A building used for sleeping more than 12 persons shall be protected throughout with an approved automatic fire detection system, or a staff member on night watch awake and dressed shall be provided to make rounds of all floors of all buildings at frequent intervals between the hours of 10 P.M. and 7 A.M. or other additional times when occupants are sleeping.

(3) Fire extinguishers of class and size and at locations determined by the fire inspector shall be installed throughout the camp.

R 400.1043. Heating.

Rule 1043. (1) Heating shall be by 1 or more approved sealed combustion heaters drawing combustion air directly from the outdoors and installed in accordance with the manufacturer's specifications, or by a central heating plant installed in an enclosure providing a minimum one hour's resistance to fire, including "B" labeled fire door and frame assemblies in an interior door opening to this enclosure and an approved fire damper in any duct piercing this enclosure located where the enclosure is pierced. Air for proper combustion shall be provided directly from the outdoors through a permanently open louver.

(2) A combustion type water heater shall be installed in the same enclosure or in a similar enclosure of the same construction.

(3) Underwriters' laboratories approved, permanent, fixed-type electrical heating, such as panel or baseboard type, may be approved in any location.

(4) A portable auxiliary heating unit shall not be used in a camper occupied building.

(5) A boiler, if used, shall be inspected and a certificate provided as required by the boiler division, state department of labor.

(6) A fireplace opening shall have an approved screen or glass device to prevent the spread of fire. In new fireplace construction a minimum masonry facing around the fireplace opening of 8 inches to the sides, 12 inches above and 16 inches at the floor shall be provided and the chimney shall have an approved flue lining.

R 400.1045. Electrical service and flammables.

Rule 1045. (1) The electrical service shall be maintained in a safe condition. Where conditions indicate a need for inspection, and on a new or remodeling project, the electrical service shall be inspected by a qualified electrical inspector and a copy of the certificate of approval shall be submitted to the fire inspector.

(2) Liquid flammables, propane fuel tanks, gasoline powered equipment, or other highly flammable materials shall not be stored in a building occupied by campers. Storage of flammable liquids shall comply with the flammable liquids regulation promulgated pursuant to Act No. 207 of the Public Acts of 1941, being MCLA 29.3a et seq, which may be obtained from the fire marshal division of the department of state police.

C. SANITATION PROVISIONS

R 400.1051. Location and housing.

Rule 1051. (1) A campsite shall be located on land that provides good natural drainage or be properly drained. Children shall be protected from hazardous areas such as traffic, cliffs, sinkholes, pits and abandoned excavations. These areas shall be guarded or posted to reduce the possibility of accidents.

(2) A camp building shall comply with applicable building, plumbing, electrical and similar codes. A building shall remain dry. Walls, ceilings, and floors shall be of such construction, type and finish as to be kept clean easily. A stairway shall be equipped with structurally safe handrails.

(3) A tent used for sleeping and living purposes which remains in one location for more than 2 weeks shall be provided with a floor which is smooth, easily cleaned and in good repair.

(4) Sleeping quarters shall be convenient to toilet facilities. A basement where a sleeping room is located shall be at least 50% above grade. A room arrangement shall not be such that access to a sleeping room is only by going through another sleeping room, bathroom or water closet compartment. When required by the health inspector, mattresses shall be covered with waterproof washable material.

R 400.1053. Food.

Rule 1053. (1) Food shall be obtained from an approved source. Milk and milk products shall be used only when pasteurized. Canned goods shall be used only when commercially packed.

(2) A permanent food preparation area, whether on or off the campsite shall comply with the applicable provisions of Act No. 269 of the Public Acts of 1968, being sections 325.801 to 325.813 of the Michigan Compiled Laws. Equipment used to transport food and dishes shall meet sanitation standards for insuring safe food.

R 400.1055. Heating.

Rule 1055. (1) Heating equipment shall be capable of maintaining a temperature of at least 70 degrees Fahrenheit at a point 2 feet above the floor. An accurate thermometer shall be provided. A portable heating device or space heater shall not be used.

(2) A fireplace shall be protected by a screen or glass device to prevent burns. A hot water and steam radiator and pipe shall be shielded to prevent burns.

R 400.1057. Light, ventilation and screening.

Rule 1057. (1) The total window, screened area, and glazing in door measured between stops for a room occupied by children shall be not less than 10% of the floor area and the total openable window area shall be not

less than 2 1/2% of the floor area, unless central air conditioning is provided. A skylight, louver, transom, glass block panel and similar light transmitting device shall not be counted for more than 50% of the required area in lieu of conventional windows, screened areas and glazed doors.

(2) During fly season each door, window and other opening to the outside used for ventilation purposes of a building occupied by campers shall be supplied with a screen of not less than 16 mesh. Each screen door shall swing outward and have a self-closing device in working condition.

R 400.1059. Swimming beaches and pools.

Rule 1059. (1) The water of a natural swimming beach shall be free from contamination by garbage, refuse, sewage pollution or foreign or floating material. The water shall be of such clarity that a 12-inch white square with 6-inch black center can be seen in 5 feet of water when the beach is in use. A sanitary survey or evaluation of the quality of the water at a swimming area shall be made in accordance with R 325.2101 to R 325.2103 of the 1968 supplement to the Michigan Administrative Code.

(2) An artificial swimming pool shall be constructed and maintained in accordance with Act No. 230 of the Public Acts of 1966, being sections 325.601 to 325.620 of the Michigan Compiled Laws and the rules adopted thereunder.

R 400.1061 Toilet fixtures.

Rule 1061. (1) The following table shall be used to determine the number of toilet fixtures needed with showers being optional. This rule may be waived by the local health department for a day, troop or travel camp that meets at a state or metropolitan county park. Flush urinals may be substituted for not more than 1/2 of the required number of toilets for girls.

PERSONS OF EACH SEX TO BE SERVED	BOYS		GIRLS	BOYS OR GIRLS	
	TOILETS	URINALS	TOILETS	LAVATORIES	SHOWERS*
1-18	1	1	2	1	1
19-33	2	1	2	2	2
34-48	2	2	3	2	3
49-63	3	2	4	3	4
64-79	3	3	5	3	5
80-95	4	3	6	4	6

*When showers are provided as bath facilities, hot water shall be available.

R 400.1062. Water.

Rule 1062. (1) Each sink, lavatory and shower shall be supplied with safe and potable water, sufficient in quantity and pressure to meet conditions of peak demand.

(2) Water shall be supplied from a public water system, if available, otherwise from an approved private source. Water for dwellings shall be kept free from connections to an unsafe water supply and from cross connections to a drainage or secondary water system.

(3) A ground water supply system shall comply with Act No. 294 of the Public Acts of 1965, being sections 325.221 to 325.240 of the Michigan Compiled Laws as to registration of the well driller and pump setter. The location, construction, and maintenance of the system shall comply with R 325.1451 to R 325.1461 of the 1964-65 supplement to the Michigan Administrative Code.

R 400.1065. Sewage, garbage, and other solid waste.

Rule 1064. (1) Sewage and other water carried wastes shall be disposed of through a municipal sewer system when such a system is available. Where municipal sewer connections are not available, liquid wastes shall be discharged into an approved private system. The private system shall not create a nuisance or pollute a stream, lake, or other body of water, or contaminate a water supply or bathing place and shall comply with applicable local health department requirements.

(2) Garbage produced in the kitchen area shall be removed and stored in flyproof and watertight containers with tight fitting covers which are emptied not less than twice a week. They shall not be filled to overflowing or allowed to become foul smelling or breeding place for flies. A garbage can shall be provided with a water proof liner or thoroughly cleaned after each emptying.

(3) Other solid waste shall be handled and removed at intervals so as not to create a nuisance or a menace to health.

R 400.1066. Farm and domestic animals.

Rule 1066. (1) A horse or other farm animal shall not be permanently quartered within 500 feet of living quarters, kitchen, or mess hall.

(2) A temporary shelter, corral, tie-rail or hitching post shall not be located within 200 feet of dining hall, kitchen or other place where food is prepared, cook or served. Manure shall not be allowed to remain for more than 12 hours at such a location. Fly repellants and other precautions shall be used to prevent such a location from becoming an attraction for or breeding place for flies.

(3) Manure from permanent and shelter quarters used for horses shall be removed from the premises not less than weekly. Storage between removals shall be in flytight enclosures or in piles isolated from the area of camp activity.

(4) Drainage from stables and temporary quarters for horses shall not be permitted to flow into a spring, stream or lake in such a manner as to create dangerous pollution.

(5) A horse, dog or other domestic animal or pet shall not be permitted on a bathing beach or in the water in the area used for waterfront activities.

R 400.1068. Maintenance.

Rule 1068. (1) A campsite shall be maintained in a clean, sanitary and safe condition free from standing water.

(2) The campsite, including main and accessory structures, shall be maintained so as to prevent and eliminate rodent and insect harborage.

(3) A roof, exterior wall, door, skylight and window shall be weathertight and watertight and shall be kept in sound condition and good repair.

(4) Floors, interior walls and ceilings shall be sound and in good repair and maintained in a clean and sanitary condition.

(5) A plumbing fixture and water and waste pipe shall be properly installed and maintained in good sanitary working condition.

(6) A water closet compartment, bathroom and kitchen floor surface shall be constructed and maintained so as to be reasonably impervious to water and to permit the floor to be easily kept in a clean and sanitary condition. Floor finishes should be of non-slip material. A floor shall be cleaned not less than once a day and kept in good repair.

(7) Equipment, including playground devices, shall be inspected periodically for defects. Proper maintenance shall be carried out to keep it in a safe operating condition.

ARCHERY SAFETY STANDARDS FOR CHILDREN'S CAMPS

Section 722.102, MCL 1948, as amended:

> *"(1) The department of social services, hereinafter referred to as the department, shall be responsible for the development of adequate standards of child care, and after consultation with the department of public health and the department of education shall make, prescribe and publish such rules governing child welfare agencies and foster homes, not inconsistent with the provisions of this act, as shall be deemed necessary or advisable to effect such standards, to protect the best interests of minor children, and to carry out the purpose of this act. . . ."*

Under the above authority the following rule was promulgated for children's camps:

Rule 400.233 (11), Administrative Rules:

> *"All hazardous camp activities such as archery, aquatics, riding and rifle shall be supervised by a qualified activities specialist and conform as near as possible with the safety standards issued by this department."*

The safety standards in this booklet have been developed as an extension of the statute and the administrative rule, and are requirements for licensed camps.

STANDARDS FOR THE ARCHER

1. Use bows and arrows only in areas set aside for archery.
2. A nocked arrow (one that is placed on the bow string) is like a loaded gun. A bow drawn with an arrow nocked is like a loaded gun cocked and ready to shoot. Be as thoughtful and careful when using a bow and arrow as you would be using a gun with ammunition.
3. Never nock an arrow until after the signal is given to shoot. Keep arrow in quiver until the signal is given to shoot to be sure that it will not be nocked.
4. Stay behind the shooting line until the signal is given to retrieve arrows. Then all archers are to go at one time to retrieve.
5. Straddle the shooting line to be sure that each member of the class is directly behind the one in front of him.

Standards for the Archer (Cont'd)

6. Feel a definite responsibility for the safety of every other member of the class, as well as for yourself.

7. Remove pins or buttons of any kind from the left of a sweater or blouse during shooting to avoid catching the bow string on them.

8. Always keep in mind how powerful a bow is. An arrow released from even a medium-weight bow can put a hole through a piece of metal. Keep ever in mind the extreme seriousness of an accident that would result if a person were hit by a released arrow!

9. Make it your duty to point out to every other boy or girl the importance of constant safety consciousness on the archery range. Be alert to notice the slightest offense and remind the offender before he has a chance to cause an accident.

10. Remember that any part of the range in front of the shooting line, even at the extreme right or left, is forbidden territory until after the signal is given to retrieve arrows.

11. An archery range is not a safe terrain for bare feet. Wear shoes or sneakers.

STANDARDS FOR THE USE OF ARROWS

1. Nock the arrow with the cock feather pointing away from the bow, not toward it.

2. Check new arrows for glue deposits, especially on the side feather to the left of the cock feather which passes over the top of the bow hand. If there is any roughness at the base of this feather, it will scratch the hand as the arrow is released. The excess glue can be rubbed off with fine sand paper. If a scratch appears on the top of the hand, all arrows should be checked before being shot again. A band-aid should be placed on the scratch before shooting is continued.

3. Be sure arrows are long enough, especially for beginning archers, to prevent overdrawing the arrow and causing serious injuries.

4. Draw arrows from the target one person at a time while the others stand at the side of the target.

5. After retrieving the arrows, place them in the quiver--never on the ground.

Standards for the use of Arrows (Cont'd)

6. Inspect arrows for cracks or breaks in the shaft (a great menance to safety) and break in two any that are questionable. The only way you can be sure they will not be shot, and possibly go through someone's hand, is to dispose of them.

7. If an arrow has hit a hard object so that the point has been pushed into the shaft, be sure it is filed down and rubbed with sandpaper until it is smooth and then waxed before it is shot again. Watch for any arrow that may have this splintering at the pile end; if such an arrow is shot before being repaired, the splintering will follow up the shaft when it enters the target and the arrow will be ruined. Also, there is danger of getting slivers in the hand on the release.

STANDARDS FOR THE USE OF THE BOW

1. Never draw a bow without an arrow in it as it may be overdrawn and cause the bow to break or the string may slip from the fingers and break the bow.

2. Never draw a bow, even without an arrow in it, while someone is in front of it. The bow may break and the pieces fly forward with force which would cause injuries.

3. While bracing a bow, keep the fingers from getting between the string and the bow at the upper end. Keep the hand firmly placed, palm down on the top of the bow, keeping that arm straight until you are certain the loop is definitely in the upper nock of the bow before removing the hand. If the loop of the string slipped out of the nock, the bow would snap back, hitting the archer in the head.

4. Check the fistmele (distance from belly of bow to string when braced) to be sure it is six inches. If it is less than this, the string will slap your wrist.

5. Brace the bow correctly, applying pressure only where it should be applied.

6. Unbrace the bow when you have finished shooting.

STANDARDS REGARDING TECHNIQUE

1. Avoid injuring the left arm at the elbow joint by paying careful attention to the correct position of the left arm at full draw.

2. Avoid bruising the left shoulder by using a very light bow and training both shoulders to move down and back on the draw, instead of hunching the left shoulder.

Standards Regarding Technique (Cont'd)

3. Arm guards and finger protection are "musts." Tender fingers may require tincture of benzoin to toughen the skin. Apply before fingers become sore.

4. Keep the forefinger of the bow hand around the bow grip, with the thumb on top of it to avoid the possibility of injuring the finger or making the arrow fly high.

5. Keep the bow arm free from tension, with the elbow joint turned down and out at full draw to avoid overdrawing the arrow or hitting the left arm at the elbow.

STANDARDS FOR COUNSELORS OR INSTRUCTORS

1. Know all of the above safety rules and be sure your campers know them and their complete meaning. Emphasize the most important ones before the shooting begins, then go back to them, studying them more in detail, making constant reference to conscientious use of all rules.

2. Set up the archery range and organize and plan your archery program and procedures so that all possible causes for accidents are removed. "An ounce of prevention is worth a pound of cure."

3. Have supervised practice at all times. Have all campers begin to shoot on a signal and retrieve on a signal--on all targets.

4. Make "safety conscious" every camper with whom you come in contact. Bows and arrows are weapons. Remember this when you put them into the hands of boy and girls.

5. There is no safe place in front of the shooting line. Although arrows glance off to the left more frequently than they do to the right, it is possible for them to accidentally glance off in either direction. The only safe place is behind the shooting line.

6. Insist upon arm guard and finger tab. It is better that a camper does not shoot at all than to shoot without arm guard and tab as only discouragement can result.

7. Check on what each camper is wearing to be sure there is nothing in the path of the bow string on the release.

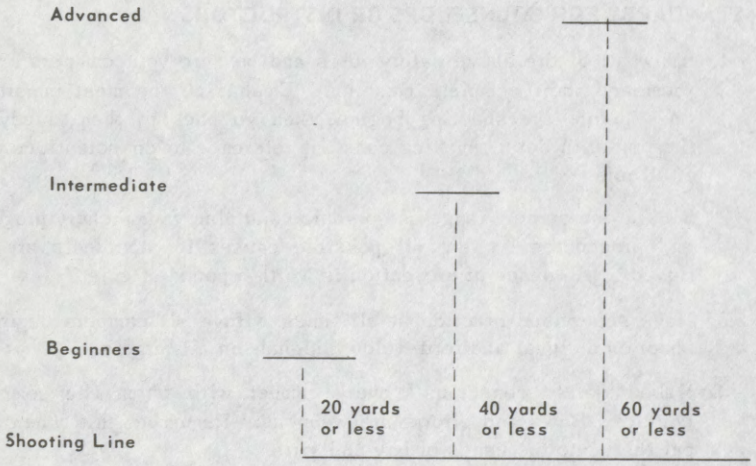
8. Make each camper responsible not only for his own safety practices, but for those of the archer in front of him on the shooting line. This is the only way to insure safety since the instructor cannot watch every member of the class every minute.

Standards for Counselors or Instructors (Cont'd)

9. Caution campers about arrows that drop from the bow string; these should be reached with the bow and pulled back of the shooting line. Caution campers about reaching over the line to pick up an arrow. Beginners will need to be constantly reminded of this danger.

STANDARDS FOR THE ARCHERY RANGE

1. When different ranges are required for a group that is shooting at the same time on the same field, use one common shooting line and have the targets set as shown in the sketch.



NOTE: the distances of targets from the shooting line will vary with the skill of the archers.

2. Check all doors on an indoor range and all possible entrances to the range proper, especially between the shooting line and the targets and behind the targets. Have doors locked. Avoid any possibility of passersby going behind the targets, even at a distance, or trespassing between the shooting line and the targets. Out-of-doors, have at least 20 to 30 yards of clearing behind the targets, if possible.

3. Have ropes surrounding the archery range.

Standards for the Archery Range (Cont'd)

4. A safe archery program can be conducted only if an instructor or counselor knows the subject thoroughly. To attempt to teach without adequate training and experience is an unsafe practice in itself. Only through sound and complete information about the sport on the part of an instructor or counselor can a truly safe archery program be conducted in any camp.

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AQUATIC SAFETY STANDARDS FOR CHILDREN'S CAMPS

Section 722. 102, MCL 1948, as amended:

"(1) The department of social services, hereinafter referred to as the department, shall be responsible for the development of adequate standards of child care, and after consultation with the department of public health and the department of education shall make, prescribe and publish such rules governing child welfare agencies and foster homes, not inconsistent with the provisions of this act, as shall be deemed necessary or advisable to effect such standards, to protect the best interests of minor children, and to carry out the purpose of this act. . . ."

Under the above authority the following rule was promulgated for children's camps:

Rule 400.233 (11), Administrative Rules:

"All hazardous camp activities such as archery, aquatics, riding and rifle shall be supervised by a qualified activities specialist and conform as near as possible with the safety standards issued by this department."

The safety standards in this booklet have been developed as an extension of the statute and the administrative rule, and are requirements for licensed camps.

STANDARDS FOR BATHERS

1. Wait for at least an hour after meals before entering the water.
2. Always swim with a "buddy" and only at a place provided for swimming.
3. Never dive in strange water; always check the depth, bottom, etc., before diving.
4. Always stay within the area set up for swimmers of your ability. It is not necessary to be in water over your head in order to swim.
5. Avoid staying in the water too long. Thirty to forty-five minutes should be the maximum length of time spent in the water.
6. If you see someone in trouble in the water, make the rescue with a boat, life buoy, assist pole, or similar equipment. Don't attempt a swimming rescue unless you are sure you know how to go about it.

Standards for Bathers (Cont'd)

7. Learn to breathe correctly while swimming because correct breathing lessens fatigue.
8. Obey all the rules and regulations established by the camp waterfront director.
9. Have fun in the water but avoid ducking, splashing, and bothering others at play.
10. Avoid long exposures to sunshine, especially in the late morning and early afternoon.
11. Never swim after dark--dips only in shallow and properly lighted areas.
12. Never go on long swims unless escorted by a boat and two good swimmers in the boat.
13. Never swim alone.
14. Never swim during electrical storms.
15. Never call for help unless help is actually needed.

STANDARDS FOR DIVING

1. Always dive or jump straight forward, not off to the side.
2. Do not bounce on the board since a slip or fall could be very dangerous.
3. Look for swimmers before making your dive.
4. Only one person is to dive from the board at one time; double dives often result in injury.
5. Never push or clown while on the diving board or tower.
6. Before making a dive, wait until the previous diver has emerged on the surface and moved out of the way.
7. Use protective trunks or suits for fancy diving.
8. Never dive at night.
9. Never attempt difficult dives unless diving instructor is present.
10. Don't swim under diving boards.
11. Use proper approach to board.
12. Dive only in marked-off areas.

Standards for Diving (Cont'd)

13. Have sufficient depth for diving (one meter board, 9-10 feet).

14. Scuba diving is to be permitted only for older campers, and under constant supervision.

15. Have one qualified scuba instructor for every two campers engaged in this activity. The campers are always to be kept under visual supervision.

STANDARDS FOR THE CAMP LIFEGUARDS

1. During general swim periods, the waterfront director is to assume the overall supervisory duty. He is to be so situated that he can see every section of the bathing area without turning his head.

2. Test all campers and staff at the beginning of the camping season and classify them as nonswimmers, intermediates, and swimmers.

3. Instruct campers to use the toilet before all swimming periods.

4. Teach all campers how to prevent getting water up the nose and in the ears.

5. Use the "buddy system" and strictly enforce it during all swimming periods.

6. Use some method for checking campers in and out of the water at all swimming periods.

7. Do not permit removal of or playing with lifesaving equipment at any time.

8. Check swim area constantly for drift materials, especially after storms.

9. Order all swimmers out of the water in emergencies.

10. Never leave a beach unguarded, no matter what the emergency may be that calls you from the beach.

11. Set up a <u>just</u> system for penalties for waterfront violations. Remember--swimming is one main reason for coming to camp; severe "no swimming" penalties defeat the purpose of camp.

12. Keep lifeguard boat available at all times.

13. Advise all campers and staff of rules and regulations prior to first swim.

Standards for the Camp Lifeguards (Cont'd)

14. Post rules and regulations in a prominent place.
15. Keep adequate records on swimming ability of each camper.

STANDARDS FOR THE USE OF BOATS AND CANOES

1. Keep boats and canoes within view of the boating supervisor.
2. Permit only the boats used for supervising bathers in or near the swimming area while campers are in the water.
3. Furnish all camp watercraft with a spare oar or paddle.
4. Instruct all campers in the use of watercraft before giving permission to use them.
5. Horseplay and clowning while in boats and canoes must never be permitted.
6. Do not permit use of watercraft after dark.
7. Avoid overloading or overcrowding watercraft.
8. Have an anchor in each boat.
9. Have experienced canoeists in lead and rear canoes--same for boat trips.
10. Keep sailing craft in view of sailing instructor at all times.
11. Have emergency power boat stand by during sailing periods.
12. Never permit nonswimmers in boats alone.
13. Life preservers are recommended for all passengers in sailboats and canoes.
14. Nonswimmers must wear vest-type life preservers in all watercraft.
15. Know marine laws governing all watercraft.
16. Keep all watercraft in excellent condition.
17. A lifeguard must patrol the boating area in a maneuverable craft, preferably under motor power.

STANDARDS FOR DOCKS, PIERS, AND RAFTS

1. Areaways on piers, docks, and rafts must be kept clear of all objects except those used in administering the swimming program.
2. Provide space for the required lifesaving equipment on docks, piers, and rafts.
3. Ladders must be located in such a way as to keep them clear at point of entry, springboards, and diving towers.
4. No running is to be permitted on the piers.
5. No fishing is to be allowed on swim piers.
6. Provide ample width for piers.
7. Build docks and piers with high grade materials (wood type--free of nails).
8. Have the water depth marked on the piers.
9. Have the raft well anchored.
10. Locate the raft a safe distance from shore.
11. Do not install diving boards on floating rafts.
12. No swimming is to be allowed under raft, piers, or docks.
13. No pushing is to be permitted on raft, piers, or docks at any time.
14. Provide the surface of docks with a nonskid surface (wood type--spread sand on wet paint).
15. Water must be of sufficient depth for diving from rafts.

STANDARDS FOR WATER SKIING

1. Insist on qualifying swim test, including jumping and falling in water of good depth, underwater swimming, treading water, and floating.
2. Life jackets on all skiers.
3. Check ski area for "deadheads" (submerged logs, stumps, etc.). and other debris.
4. Maintain a roped-off area with clear bottom for takeoff.
5. Provide a safe and clear landing area for skiers.

Standards for Water Skiing (Cont'd)

6. Know water-skiing signals (boatsmen and skiers).
7. Have proper supervision at takeoff and landing area.
8. Keep rope ladders in speedboats.
9. Have two qualified swimmers (guards preferably) in speedboat, one pilot and one "rope" man.
10. Keep slack out of towline; avoid getting towline caught in "prop."
11. Make rescues on lee side of boar--allow for boat drift toward skier.
12. Make all rescues into boat with motor cut off.
13. Keep a paddle or two in boat for manual operation when motor is off or it fails.
14. Have extra gas and life buoy in boat.
15. Know marine rights for skiers.

STANDARDS FOR BOAT TRIPS OUT OF CAMP

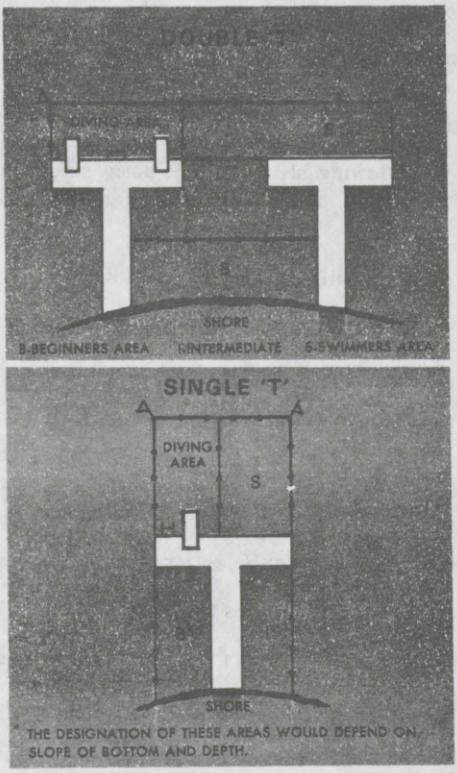
In addition to following all waterfront camp safety practices, it is absolutely necessary when on canoe or boat or sailing trips to take additional precautions.

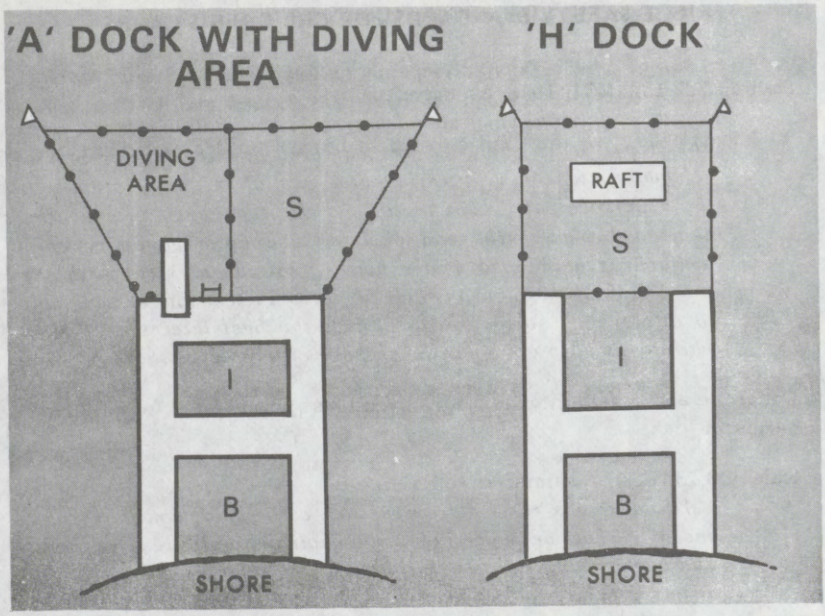
1. Never swim in swift and tricky currents.
2. Know bottoms, sudden drop-offs, etc. when swimming.
3. Select calm, protected waters for swimming.
4. Enter water gradually after long paddles or rows.
5. Avoid long swims after long paddles or rows.
6. Provide adequate protection against sunburn.
7. Avoid poisonous plants--be able to recognize them.
8. Stay with overturned canoes (in lakes and calm rivers).
9. Head for shore with current ("in whitewater" or severe currents).
10. On lake or wide river trips, stay close to shore and on lee side.
11. Keep bow of craft toward wind--depends on destination.

Standards for Boat Trips Out of Camp (Cont'd)

12. Keep bow of craft with wind--depends on destination. Severe storms, keep bow toward wind and let boat drift toward shore, stern first.
13. Never paddle or row into crosswind--causes upsets and swamping.
14. Secure gear when on lakes and calm rivers.
15. Do not secure gear in "whitewater" or swift currents; keep it buoyant and waterproof so that gear eventually floats to shore and is not embedded in rocks with craft which is too dangerous to reach.

Docks and piers may be used as a part of the system for marking the swimming area. The following are offered as suggested camp waterfronts.

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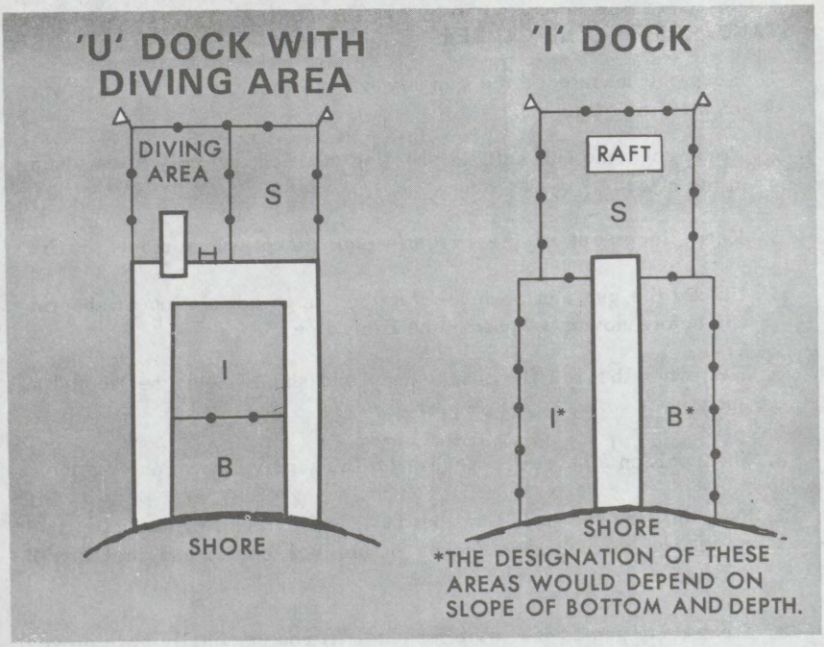
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RIFLE SAFETY STANDARDS FOR CHILDREN'S CAMPS

Section 722.102, MCL 1948, as amended:

> *"(1) The department of social services, hereinafter referred to as the department, shall be responsible for the development of adequate standards of child care, and after consultation with the department of public health and the department of education shall make, prescribe and publish such rules governing child welfare agencies and foster homes, not inconsistent with the provisions of this act, as shall be deemed necessary or advisable to effect such standards, to protect the best interests of minor children, and to carry out the purpose of this act. . . . ."*

Under the above authority the following rule was promulgated for children's camps:

Rule 400.233 (11), Administrative Rules:

> *"All hazardous camp activities such as archery, aquatics, riding and rifle shall be supervised by a qualified activities specialist and conform as near as possible with the safety standards issued by this department."*

STANDARDS FOR THE CAMPER

1. Keep the muzzle of the gun always towards the target area when on the firing line.
2. Never cock the gun until in shooting position and only when aiming at the target.
3. Keep finger out of the trigger guard except when ready to fire.
4. Unload the gun and open the "action" upon completion of shooting and before moving away from the firing line.
5. Remember that a rifle is not a toy and should never be treated as such.
6. Shoot only on a safe rifle range under the supervision of an instructor.
7. Keep in mind that a .22 caliber bullet will travel for one mile; that it will go through nine inches of ordinary board; and that it will ricochet a long way across water.
8. Treat every gun as if it were loaded until you personally have proven otherwise.

9. Always keep the "action" open when not in the process of firing.

10. Know your gun and the type of amunition you are using.

11. Obey instantly all firing line commands.

12. If at all possible wear some kind of glasses when shooting (not sunglasses).

STANDARDS FOR EQUIPMENT

1. Rifles are to be the .22 caliber rim-fire type only.

2. Do not use semiautomatic rifles in a camp rifle program.

3. Do not use repeating rifles having tubular magazines.

4. Rifles which refuse to extract, eject, or fire are not to be used.

5. Do not use rifles which have less than a three-pound trigger-pull.

6. Check rifles frequently for excessive grease and oil. Heavy grease in the barrel or chamber may cause a blown-up gun.

7. Barrels which are fouled with rust or badly pitted are not to be permitted on the range. They are both inaccurate and dangerous.

8. Rifles which rupture cartridge cases must be checked by a gunsmith.

STANDARDS FOR THE RIFLE INSTRUCTOR

1. Discuss and demonstrate the safety rules frequently with all campers in the rifle program.

2. Use the coach and pupil system whenever possible.

3. Have at least one qualified assistant for every four campers on the firing line.

4. Keep those campers waiting to shoot at the "ready line" about 20 feet to the rear of the firing line.

5. Have all campers at the rifle range talk in hushed tones while firing is being permitted.

6. Have all rifles resting in the forks with the actions open before campers change targets.

7. Use the recognized commands at all times and insist on 100% obedience from campers.

8. Keep all rifles and ammunition in locked cabinets when not in use. If possible, store ammunition and rifles in separate locked caninets.

9. Never leave the rifle range while a class is in progress.

10. Become completely familiar with the latest materials available on

11. The chief rifle instructor must be at least 18 years of age. He must hold an instructors certificate issued by the National Rifle Association or a certificate of proficiency from the Small Arms Firing School, National Matches. If a former member of the armed forces is able to adapt his service experience to the requirements of a .22 rifle instruction program, above requirements may be waived.

STANDARDS FOR THE RIFLE RANGE (50-foot outdoor range)

1. Locate the range where campers will not wander into the field of fire while engaged in other camp activities. A northerly direction of fire is preferred since it eliminates the problem of the sun blinding the shooter.

2. Fence blind approaches to the field of fire and distribute waming signs generously.

3. Level the firing line from one flank to the other with a minimum five feet between firing points.

4. Establish a "Ready Line" 15 to 20 feet to the rear of the firing points.

5. Do not use a hill as a natural backstop unless it has a crest at least 30 feet above the level of the firing point.

6. All brush which might conceal a person from the view of those on the firing line must be cleared away over an area extending to the crest or, in the case of a large hill, at least 100 yards up the slope from the targets.

7. For additional safety, take a cut out of the face of the hillside immediately behind the targets to provide a perpendicular face to catch the bullets and prevent ricochet.

8. Remove all rocks, glass, or metal from the hillside in the cleared area, particularly in the perpendicular cut just back of the targets.

9. If any obstacles cannot be removed from the hillside, cover them with at least six inches of soil and sod or seed to prevent chance ricochets.

10. In areas where a natural backstop is not available, use a wood crib filled with dry earth or sand at least 10 feet high, 30 inches thick, and 6 feet beyond the end targets.

HORSEBACK RIDING SAFETY STANDARDS FOR CHILDREN'S CAMPS

Section 722.102, MCL 1948, as amended:

"(1) The department of social services, hereinafter referred to as the department, shall be responsible for the development of adequate standards of child care, and after consultation with the department of public health and the department of education shall make, prescribe and publish such rules governing child welfare agencies and foster homes, not inconsistent with the provisions of this act, as shall be deemed necessary or advisable to effect such standards, to protect the best interests of minor children, and to carry out the purpose of this act. . . ."

Under the above authority the following rule was promulgated for children's camps:

Rule 400.233 (11), Administrative Rules:

"All hazardous camp activities such as archery, aquatics, riding and rifle shall be supervised by a qualified activities specialist and conform as near as possible with the safety standards issued by this department."

The safety standards in this booklet have been developed as an extension of the statute and the administrative rule, and are requirements for licensed camps.

STANDARDS FOR THE CAMPER

1. Conduct yourself quietly and calmly around all horses.

2. When approaching a horse from behind, move slowly and speak to him gently, calling him by name.

3. Dismount to adjust clothing or equipment.

4. Always approach a group of riders at a walk. To do otherwise can be very dangerous.

5. When riding on a road with traffic, face the traffic on the left of the road.

Standards for the Camper (Cont'd)

6. Keep a horse's length distance between horses when on trail.

7. Always enter and leave the riding ring or corral at a walk.

8. Mount from the left side, keeping your body in close to the horse to avoid jabbing him with your toe.

9. Always ride with at least one companion when on trail.

10. Always obey instantly the commands of the riding instructor.

11. Be considerate of your fellow campers and avoid behavior around horses which might cause others to be injured.

12. Remember a horse is a living thing; treat him with kindness and your ride will be happier and safer.

STANDARDS FOR THE RIDING INSTRUCTOR

1. For beginning riders, hold the horse during mounting and dismounting.

2. Keep very young and inexperienced riders on a lead line until confidence and ability are developed.

3. Know all your horses and make assignments to campers on the basis of the individual camper's ability, not his likes and dislikes.

4. Make certain the horses are well shod and that the track is in good condition prior to every riding period.

5. Avoid overcrowding the riding ring or corral since an overcrowded ring can be dangerous.

6. Insist that campers waiting or watching around the riding ring or corral be quiet when campers are mounted in the ring. Shouting and unnecessary noise around the ring can only lead to trouble.

7. Determine the length of riding periods by the riders' ability. Beginners tire more quickly and riding periods for them should not exceed 45 minutes.

Standards for the Riding Instructor (Cont'd)

8. Have two instructors in the ring or corral with all beginners' groups.

9. Have instructions for beginners include care and consideration for the horse. Improper treatment of the animal is the cause of many accidents.

10. Be alert at all times and watch for any behavior on the part of the horse or rider which might lead to an unfortunate incident.

STANDARDS FOR TRAIL RIDES

1. Campers must be able to walk, trot, and canter the horse safely before going on trail rides.

2. Have two instructors with every trail ride; the chief instructor is to ride at the rear of the column.

3. Give a warning command before the execution command.

4. Set the pace according to the ability of the most timid rider or the slowest horse.

5. Always walk the horses up and down hills and when approaching a blind turn in the road or trail.

6. On trail campers should ride in single or double file with approximately a horse's length between the riders.

7. Use the flank turn when crossing highways so that all horses cross at one time.

8. Require campers to keep their horses at a collected gait when on trail.

9. Take no more than 12 campers on trail at any one time.

10. Inspect all trails and bridle paths prior to their use by campers.

11. In case of an accident, the instructor–in–charge is to return to camp with the group, avoiding unnecessary haste. The assistant instructor

Standards for Trail Rides (Cont'd)

is to remain with the injured camper until help arrives.

12. When approaching the stable, have all horses at a walk.

STANDARDS FOR JUMPING

1. The camper should be able to go over Cavaletti (poles on the ground which are properly spaced) and do this adequately both with and without stirrups.

2. Before starting to jump, the main objective is to instill confidence in the rider and therefore a safe, quiet, but willing horse is a necessity.

3. Use a great variety of low jumps until skill has been sufficiently developed.

4. Have the camper go over these low jumps at the trot to develop control and the ability to "stay with" the horse.

5. Keep at the low jumps until all errors have been corrected.

6. Have campers wear "hard hats" at all times when jumping.

7. Permit only campers with superior riding ability to jump.

8. If a camper falls from the horse in the process of jumping, do not move the camper until checked by the camp nurse or camp physician.

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MINNESOTA STATE BOARD OF HEALTH

Regulation 10905 - Children's Camps

(a) Camp Site. The camp site shall be reasonably distant from any environment detrimental to the health and safety of the children in attendance at the camp. Adequate area shall be available for the development of satisfactory water supply and waste disposal systems. In order to protect against all hazards which cannot be eliminated, suitable guards shall be installed and maintained.

(b) Buildings. All buildings used for food preparation and storage, sleeping and other occupancy shall have roofs which do not leak, tight floors, and walls free of holes. They shall be so constructed as to provide broad and easy exit in case of fire or other emergency, and shall be adequately equipped with fire extinguishers and other fire-fighting equipment. Doors shall be tight fitting, and both door and window openings shall be sufficiently screened with a screen of not less than 16 meshes to the inch. All windows shall be so constructed as to be easily opened and closed, or shall be equipped with storm shields.

(c) Sleeping Quarters. Each camper shall have an individual bed. There shall be at least three feet between beds when placed side by side, and at least one foot when placed end to end. The beds shall be arranged for head-to-foot or foot-to-foot sleeping in such a manner as to provide a seven-foot horizontal separation between the heads of the sleepers.

Any room containing a double-deck bunk shall have at least one window which can be easily opened. The top of the window shall be higher than the top rail of the upper bunk. The minimum space between the floor and the lower bunk rail shall be twelve inches, and the minimum space between the lower and upper bunk rails shall be thirty-six inches. No bunk shall be more than six feet above the floor. There shall be at least thirty-six inches between the upper bunk and the ceiling.

Every sleeping room shall be ventilated. The area of direct opening to the outside shall be equivalent to at least five per cent of the floor area. Where this condition cannot be met, adequate mechanical ventilation shall be provided.

(d) Kitchen. The kitchen shall be separated from the dining room by a partition. The walls, ceiling, floor and partitions shall be so constructed as to be easily cleaned. The kitchen shall be used for no other purpose than the storage or preparation of food and the washing and storage of dishes and other food service equipment. No person other than kitchen personnel shall be permitted to enter the food preparation area. The kitchen shall be well ventilated. Illumination to afford a minimum of twenty foot-candles of light at all working surfaces and at least ten foot-candles on other surfaces and equipment during periods of food preparation and service shall be provided.

(e) Food Procurement and Storage. All food shall be of good quality. No hermetically sealed, non-acid, and low-acid food which has been processed in a place other than a commercial food-processing establishment shall be used. Meat shall be obtained from officially approved sources. Perishable food, including milk, shall be stored in clean refrigerators of adequate capacity at a temperature of 45° Fahrenheit or below. Each refrigerator shall be equipped with an accurate thermometer. Non-perishable food shall be stored off the floor in clean, well ventilated rooms which are reasonably insect- and rodent-proof. Storage areas shall be illuminated at not less than five foot-candles of light measured at thirty inches from the floor.

All milk shall be pasteurized. Milk for drinking shall be received in two-quart, quart, pint, or half-pint containers and shall be served from the original container, but where a milk dispenser of a design acceptable to the State Board of Health is used, cups and glasses may be filled directly from the dispenser. Pitchers or other non-drinking vessels shall not be filled from a dispenser and used for serving milk.

When concentrated or powdered milk is used, it shall be mixed and handled in a sanitary manner. It shall be prepared immediately prior to the time it is to be consumed and only in the quantity needed for that one period of serving.

Insecticides, germicides, other poisonous substances, and cleaning materials shall not be stored in the same room with foods.

(f) Food Service. The kitchen shall be kept clean. All food service equipment and utensils shall be so designed and of such material and workmanship as to be smooth, easily cleanable, and durable, and shall be in good repair. The food contact surfaces of such equipment and utensils shall be non-toxic, corrosion-resistant, relatively non-absorbent, and easily accessible for cleaning. Equipment which meets the National Sanitation Foundation standards will comply with these provisions. All equipment shall be so installed and maintained as to facilitate the cleaning thereof, and of all adjacent areas. Food-handling procedures which will minimize the possibility of food contamination shall be practiced.

(g) Food Service Personnel Health and Cleanliness. All persons shall wear clean outer garments and shall keep their hands clean at all times while engaged in handling food, drink, utensils or equipment. No person shall resume work after visiting the toilet without first thoroughly washing his hands. Separate hand-washing facilities with hot and cold water, soap, and approved sanitary towels or other approved hand-drying devices shall be provided for use of the kitchen and food service personnel in the food service area. No person shall expectorate or use tobacco in any form in rooms in which food is prepared. No person who has, or is a carrier of, a communicable disease, or who has infected sores or wounds, shall engage in the handling, preparation or serving of food and drink, nor shall any person so affected be delegated duties that could cause his disease to be communicated to other camp occupants or visitors.

(h) Dishwashing Facilities. One of the following methods shall be employed in dishwashing:

(1) Manual. A three-compartment sink or equivalent shall be provided, with compartments of adequate length, width and depth to permit the complete immersion of the largest utensils to be washed and wire baskets or racks of dishes, and each compartment shall be supplied with hot and cold running water. There shall be a sufficient number of baskets to hold the dishes and utensils used during the peak load. The utensils and dishes shall be thoroughly washed in hot water containing a suitable soap or detergent in the first compartment, rinsed in clean water in the second compartment, and immersed completely in clean water at a temperature of not lower than 170° Fahrenheit for at least two minutes in the third compartment. The third compartment shall be properly equipped with a heating unit or other means to maintain the specified temperature while in use. A thermometer which will accurately measure the temperature of the water in the third compartment shall also be provided. Drain racks shall be a part of the three-compartment sink and adequate space shall be available for drainage. Dishes and utensils shall be air-dried.

(2) Mechanical. Water pressure in the lines supplying the wash and rinse sections of the dishwashing machine shall be maintained at a flow pressure of not less than 15 pounds per square inch, but not to exceed 25 pounds per square inch, and the water shall be at a manifold temperature not lower than 180° Fahrenheit. The machines shall be equipped with thermometers which will accurately indicate the temperature of the wash and rinse water. New dishwashing machines shall conform to Standard Number 3 of the National Sanitation Foundation dated September 1956. Dishes and utensils shall be air-dried.

(3) Where equipment or utensils must be cleaned in place or where for other reasons the methods described in (1) and (2) are not feasible, other procedures that will provide equivalent cleaning and sanitizing shall be used.

In order to protect the clean dishes and utensils from contamination, proper storage space shall be provided.

(i) Water Supply. Every camp shall be provided with a safe supply of water acceptable to the State Board of Health and adequate to supply all needs of the occupants for culinary, drinking, and bathing purposes. Water, except that served at meals, shall be dispensed either by means of satisfactorily designed drinking fountains or individual paper cups.

(j) Bathing and Handwashing Facilities. Suitable handwashing facilities shall be conveniently located at or near each toilet. Separate handwashing facilities with hot and cold water, soap, and approved sanitary towels or other approved hand-drying devices shall be provided for the use of kitchen and food service personnel in the food service area. Shower facilities, if provided, should be on the basis of one shower head for every twenty-five persons.

(k) Plumbing. All new plumbing shall be installed according to the regulations of the State Board of Health and the provisions of the Minnesota Plumbing Code as adopted by the State Board of Health. Alterations to existing plumbing, when undertaken, shall conform to the provisions of the Minnesota Plumbing Code. Where existing plumbing defects are found to create a serious public health hazard, correction shall be undertaken immediately.

(l) Toilet Facilities. Toilet facilities shall be provided on the basis of one seat for every twelve campers. In camps or sections of camps used by boys, urinals may be substituted for one-third of the toilet seats. Toilet facilities shall be convenient to sleeping quarters and shall be adequately ventilated and equipped with artificial lighting. Toilet facilities shall be provided at the water front where physically feasible but the sewage disposal system serving the facilities shall not be located within fifty feet of the water's edge. Toilet tissue shall be provided at each unit. Toilet facilities, including rooms and fixtures, shall be kept in a clean condition and in good repair.

(m) Sewage and Excreta Disposal. Where water flush toilets are used, a sewage disposal system acceptable to the State Board of Health shall be provided. Where water flush toilets are not provided, privies of the pit type, which conform to a standard of construction acceptable to the State Board of Health, shall be used. Such privies shall be placed separate and apart from the sleeping, living, and kitchen quarters. Toilets of the privy or pit type hereinafter constructed shall be located at least 100 feet from the kitchen and dining quarters.

(n) Liquid Wastes. Liquid wastes from the kitchen, laundry, shower rooms, and other sources shall be combined with the liquid toilet wastes or shall be disposed of separately by soil absorption in a manner which will not endanger a water supply, pollute any surface water, or create nuisances, or otherwise constitute a hazard to the public health and safety.

(o) Plan Submission. Plans and specifications covering the installation of new systems of plumbing, water supply and sewage disposal, or the material alteration or extension of existing systems of plumbing, water supply and sewage disposal shall be submitted to the State Board of Health for review and approval in accordance with Regulations 10873 and 10904 of the Board.

(p) Garbage; Refuse. All garbage shall be collected in leak-proof, non-absorbent containers provided with tight-fitting lids or covers, and shall be disposed of in a sanitary manner with sufficient frequency as to prevent a nuisance. Disposal of garbage and other refuse shall be accomplished by burning in an approved incinerator, or burying, or by other means acceptable to the State Board of Health. All containers for the collection of garbage and refuse shall be kept in a sanitary condition.

(q) Swimming Beach. Natural swimming places shall be located only on lakes and streams which are relatively free of human, animal, and industrial pollution, and where such bathing and swimming will not endanger the quality of a domestic water supply, or interfere with other uses of the water by riparian owners. The area designated for swimming shall be properly marked, shall be kept free of weeds, sharp stones, sunken logs, and other debris and shall preferably have a gradual slope. Swimming pools shall be constructed and operated in accordance with standards acceptable to the State Board of Health. All water-front activities involving campers, staff members, or visitors shall be adequately supervised.

(r) Designation of Responsible Persons by Camper. Each camper and staff member shall file with the camp operator the name, address, and telephone number of one or more duly licensed practitioners of the healing arts or other responsible persons who are to be notified in case of illness or injury.

(s) Practitioner to be Designated. The camp operator shall designate one or more duly licensed practitioners of the healing arts to be called in an emergency.

(t) Infirmary and First Aid. The camp operator shall provide an infirmary for the isolation of sick or injured campers and staff members. First-aid equipment and supplies shall be available, and a person qualified in first-aid care shall be in charge at all times. When the existence of a communicable disease is suspected, the operator shall isolate the individual immediately and promptly arrange for medical attention. Transportation shall be provided for the immediate removal from the camp of the sick or injured campers or camp personnel in emergency cases.

(u) Physical Examination. A certificate of health shall be presented to the camp operator by each staff member and by each camper at the time of admission to the camp. The certificate shall be based on a physical examination performed not more than 90 days prior to admission to the camp by a duly licensed practitioner of the healing arts and shall be signed by such practitioner. It shall include a health history, an immunization record, a statement as to the existence of or freedom from communicable diseases, and instructions relative to the limitation of the camper's participation in camp activities necessitated by physical disability or impairment.

A physical check-up shall be given on arrival at the camp to reveal any communicable condition which may have developed since the physical examination.

(v) Health Records. A health record of every camper and staff member shall be kept by the camp operator. In addition to the certificate of health, it shall include the detailed records of the individual's illnesses and injuries occurring, and the first-aid treatments given, during the period of attendance at camp.

(w) Hazardous Weapons. Firearms and other hazardous weapons shall be kept in locked compartments and shall be used only under supervision.

(x) Livestock and Pets. Livestock shall be quartered not less than 500 feet from the cooking, dining, and sleeping quarters. Unless special facilities are provided, pets shall not be permitted in the camp.

(y) Duty of Camp Operator. It shall be the duty of every operator of a children's camp to carry out the provisions of this regulation.

CHILDREN'S CAMPS
M.S.144.71-144.76

For an Act Providing for the Regulation and Control of Children's Camps Organized for Educational, Recreational, or Vacation Purposes.

Be it enacted by the Legislature of the State of Minnesota.

Section 1. Subdivision 1. The purpose of this act is to protect the health and safety of children in attendance at children's camps.

Subd. 2. For the purpose of this act a children's camp is defined as a parcel or parcels of land with permanent buildings, tents or other structures together with appurtenances thereon, established or maintained as living quarters where both food and lodging or the facilities therefor are provided for ten or more people, operated continuously for a period of five days or more each year for educational, recreational or vacation purposes, and the use of the camp is offered to minors free of charge or for payment of a fee.

Subd. 3. This definition does not include cabin and trailer camps, fishing and hunting camps, resorts, and penal and correctional camps, industrial and construction camps, nor does it include homes operated for care or treatment of children and for the operation of which a license is required under the provisions of Sections 257.08 to 257.17.

Sec. 2. Subdivision 1. The state board of health is authorized to issue permits for the operation of such children's camps and such camps are required to obtain such permits.

Subd. 2. On or before June first annually, every person, partnership or corporation, operating or seeking to operate a children's camp, shall make application in writing to the board for a permit to conduct a children's camp. Such application shall be in such form and shall contain such information as the board may find necessary to its determination that the children's camp will be operated and maintained in such a manner as to protect and preserve the health and safety of the persons using the camp. Where a person, partnership or corporation operates or is seeking to operate more than one children's camp, a separate application shall be made for each camp.

Subd. 3. If the board should determine from the application that the health and safety of the persons using the camp will be properly safeguarded, it may, prior to actual inspection of the camp, issue the permit in writing. No fee shall be charged for the permit. The permit shall be posted in a conspicuous place on the premises occupied by the camp.

Sec. 3. Subdivision 1. It shall be the duty of the state board of health to make an annual inspection of each children's camp, and where, upon inspection it is found that there is a failure to protect the health and safety of the persons using the camp, or a failure to comply with the camp regulations prescribed by the board, the board shall give notice to the camp operator of such failure, which notice shall set forth the reason or reasons for such failure.

Subd. 2. The camp operator shall have a reasonable time after receiving said notice in which to correct such failure and to comply with the requirements and

regulations of the board. In the event the camp operator shall fail to comply with the requirements of said notice within a reasonable time, the board may revoke the permit of such children's camp.

Subd. 3. The camp operator shall be entitled to a hearing before the board on the revocation of his permit. A request for such hearing shall be made by the camp operator in writing. The hearing shall be held at the time and place designated by the board and at least five days' written notice of such hearing shall be given to the camp operator. The notice may be served by registered mail. The camp operator shall be entitled to be represented by legal counsel and shall have the right to produce evidence and testimony at such hearing. The board may appoint in writing any competent person to preside at such hearing. Such person shall take testimony, administer oaths, issue subpoenas, compel the attendance of witnesses, and transmit the record of the hearing to the board. The decision of the board shall be based on the evidence and testimony presented at such hearing.

Subd. 4. Where a permit has been revoked by the board it shall be reinstated upon compliance with the requirements and regulations of the state board of health.

Sec. 4. Subdivision 1. The state board of health is authorized to adopt and enforce such reasonable regulations and standards as it determines necessary to protect the health and safety of children in attendance at children's camps. Such regulations and standards may include reasonable restrictions and limitations on the following:

(1) Camp sites and buildings, including location, layout, lighting, ventilation, heating, plumbing, drainage and sleeping quarters;

(2) Sanitary facilities, including water supply, toilet and shower facilities, sewage and excreta disposal, waste and garbage disposal, and the control of insects and rodents, and

(3) Food service, including storage, refrigeration, sanitary preparation and handling of food, the cleanliness of kitchens and the proper functioning of equipment.

Sec. 5. The state board of health shall appoint an advisory council on children's camps consisting of not more than nine members to advise it in the administration of this act. The members of such council shall serve without compensation.

Sec. 6. Any person violating any of the provisions of this act or of the regulations or standards promulgated hereunder shall be guilty of a misdeameanor.

P. L. 1973, CHAPTER 375, *approved January 9, 1974*

1972 Senate No. 1062 (*Official Copy Reprint*)

AN ACT prescribing standards for certain youth camps, supplementing Title *[34]* **26** of the Revised Statutes and making an appropriation.

BE IT ENACTED *by the Senate and General Assembly of the State of New Jersey:*

1. This act shall be known and may be cited as the "New Jersey Youth Camp Safety Act."

2. It is the purpose of this act to **promote,** protect and safeguard the health and well-being of the youth of the State attending day camps and resident camps by providing for establishment of standards for the safe operation of such camps, thereby providing assurance to parents and interested citizens that youth camps meet minimum safety standards.

3. As used in this act:

a. "Youth camp" means any parcel or parcels of land having the general characteristics and features of a camp as the term is generally understood, used wholly or in part for recreational or educational purposes and accommodating five or more children under 18 years of age*[, living apart from their relatives, parents or legal guardians]* for a period of, or portions of, *[5]* **2** days or more, and includes a site that is operated as a day camp or as a resident camp.

b. "Youth camp safety standards" means criteria directed toward safe operations of youth camps, in such areas as, but not limited to, personnel qualifications for director and staff, ratio of staff to campers, sanitation and public health, personal health, first aid and medical services, food handling, mass feeding and cleanliness, water supply and waste disposal, water safety including use of lakes and rivers, swimming and boating equipment and practices,

EXPLANATION—Matter enclosed in bold-faced brackets [thus] in the above bill is not enacted and is intended to be omitted in the law.

vehicle condition and operation, building and site design, equipment, condition and density of use, emergency evacuation procedures and fire safety.

c. "Youth camp operator" means any private agency, organization, or person, and any individual, who operates, controls or supervises a youth camp, whether such camp is operated for profit or not for profit.

d. "Commissioner" means the Commissioner of *[Labor and Industry]* *Health or any of his authorized deputies, representatives, agents or employees*.

4. Every youth camp operator shall provide to each camper safe and healthful conditions, facilities and equipment which are free from *[recognized]* hazards that are causing, or *[are likely]* *may reasonably be expected* to cause, death, serious illness, or serious physical harm, as well as adequate and qualified instruction and supervision at all times, wherever or however such camp activities are conducted and with due consideration of conditions existing in nature.

5. The commissioner shall develop, and shall by rule and regulation promulgate, modify or revoke youth camp safety standards. In developing such standards, the commissioner shall consult with other State and local officials and with representatives of appropriate public and private organizations, and shall consider existing State and local regulations and standards and standards developed by private organizations which are applicable to youth camp health and safety. The commissioner shall make the initial promulgation of standards required by this act within 6 months of the effective date of this act.

*6. *No youth camp which is now or hereafter shall be established shall be operated or conducted, except by authority of a valid certificate of approval issued by the commissioner under the rules and regulations prescribed by him. Application for the issuance or renewal of certificate shall be made upon a form prescribed by the commissioner, shall set forth the location of the camp and the operator thereof, and shall be accompanied by a fee to be set in the discretion of the commissioner but not to exceed $50.00 for day camps and $100.00 for resident camps which fee shall be returned if the application is denied.*

*7. Each certificate of approval shall be valid for a period of 1 year from the date of issue. The commissioner may issue a provisional certificate subject to later approval by the commissioner, after inspection of the youth camp during the period when the camp is operational.**

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[6.] *8.* The commissioner shall be responsible for the enforcement of youth camp safety standards in this State *and the commissioner is empowered to hold hearings and otherwise to investigate charges of any violation of this act*.

[7.] *9.* a. In order to *[cary]* *carry* out his duties under this act, the commissioner may enter and inspect any youth camp and its records, may question employees, and may investigate facts, conditions, practices or other matters to the extent he deems it necessary or appropriate.

b. The commissioner shall have the power to administer oaths and examine witnesses under oath, issue subpenas, compel the attendance of witnesses and the production of papers, books, accounts, records, payrolls, documents and testimony and to take depositions and affidavits in any proceeding before the commissioner.

[b.] *c.* To determine the areas in which safety standards are necessary and to aid in promulgating meaningful regulations, camps subject to the provisions of this act shall be required to report annually, on the date prescribed by the commissioner, all accidents resulting in death, injury and illness, other than minor injuries which require only first aid treatment and which do not involve medical treatment, loss of consciousness, restriction of activity or motion, or premature termination of the camper's term at the camp. The commissioner shall compile the statistics reported and include summaries thereof in his annual report to the Governor and the Legislature.

*[8. a. Any youth camp operator who willfully or repeatedly violates the provisions of this act or any rule or regulation promulgated by the commissioner or order issued pursuant thereto shall be subject to a penalty of not more than $1,000.00 for each violation.

b. Any youth camp operator who has received a second or subsequent citation for a serious violation of the provisions of this act or any rule or regulation promulgated or order issued pursuant thereto shall be subject to a penalty of not more than $1,000.00 for each such violation.

c. Any youth camp operator who fails to correct a violation for which a citation has been issued within the period permitted for its correction shall be subject to a penalty of not more than $500.00 for each day during which such failure or violation continues, or until the camp closes in its normal course of business.

d. For the purposes of subsection b., a serious violation shall be deemed to exist in a youth camp if there is substantial probability

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that death or serious physical harm could result from a condition which exists, or from one or more practices, means, methods, operations or processes which have been adopted or are in use in such camp, unless the operator did not, and could not, with the exercise of reasonable diligence, know the presence of the violation.

e. Any penalty imposed pursuant to this act shall be used for, and recovered by and in the name of the commissioner in a civil action by a summary proceeding under the Penalty Enforcement Law (N. J. S. 2A:58–1 et seq.). Where any violation of this act or of any rule or regulation duly issued hereunder is of a continuing nature, each day during which such violation continues after the date fixed by the commissioner in any order or notice for the correction or termination of such violation, shall constitute a separate and distinct offense, except during the time an appeal from said order or notice may be taken or is pending.]*

*10. *The commissioner, upon notice and hearing, may revoke the certificate of approval and may impose a penalty not exceeding $1,000.00 for any violation of this act or of any rule or regulation duly issued hereunder or order issued pursuant thereto. If any penalty imposed pursuant to this act is not paid, then the penalty shall be sued for and recovered by and in the name of the commissioner in a summary proceeding under the Penalty Enforcement Law (N. J. S. 2A:58–1 et seq.). In such summary proceeding, the commissioner need only prove that notice was given, a hearing held, a decision rendered and a penalty imposed which has not been paid.*

*Where any violation of this act or of any rule or regulation duly issued hereunder is of a continuing nature, each day during which such violation continues after the date fixed by the commissioner in any order or notice for the correction or termination of such violation or each day the camp operates without a valid certificate of approval or continues to operate after notification of revocation of its certificate of approval, shall constitute an additional, separate and distinct violation, except during the time an appeal from said order or notice may be taken or is pending.**

*[9. a. The Superior Court shall have jurisdiction, upon application of the commissioner, to restrain any conditions or practices in any youth camp, or in any place where camp activities are conducted, which are such that a danger exists which could reasonably be expected to cause death or serious physical harm immediately or before the imminence of such danger can be eliminated through the enforcement procedures otherwise provided under this act. Any order issued under this section may require such steps to be taken as may be necessary to avoid, correct or remove such im-

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minent danger and prohibit the presence of any individual in locations or under conditions where such imminent danger exists, except individuals whose presence is necessary to avoid, correct or remove such imminent danger.

b. Upon the filing of any such application, the Superior Court shall have jurisdiction to grant such injunctive relief or temporary restraining order pending the outcome of an enforcement proceeding pursuant to this act.

c. Whenever and as soon as an inspector concludes that conditions or practices described in subsection a. exist in any camp site or place of camp activity, he shall inform the affected campers, camp owners, and camp supervisory personnel of the danger and of the fact that he is recommending to the Commissioner that relief be sought.]*

11. *Upon a violation of this act or of any rules and regulations promulgated hereunder, the commissioner shall be entitled to institute a civil action in a court of competent jurisdiction for injunctive relief to restrain such violation and for such other relief as the court shall deem proper, and the court may proceed in a summary manner in such action. Neither the institution of such action, nor any of the proceedings therein shall relieve any party to such proceedings from the penalty prescribed for a violation of this act.*

[10.] *12.* The commissioner, upon *[appliaction]* *application* by a camp owner showing extraordinary circumstances or undue hardship, and upon the determination by a field inspector, after inspection of the affected premises and facilities, that the conditions, practices, or activities proposed to be used are as safe and healthful as those which would prevail if the camp owner complied with the standard, may exempt such camp or activity from specific requirements of this act, but the terms of such exemption shall require appropriate notice thereof to parents or other relatives of affected campers.

[11.] *13.* There is hereby established in the Department of *[Labor and Industry]* *Health* an Advisory Council on Youth Camp Safety to advise and consult on policy matters relating to youth camp safety, particularly the promulgation of youth camp safety standards. The council shall consist of the commissioner, who shall be chairman, and six members appointed by the Governor from persons who are specially qualified by experience and competence to render such service. Members shall be appointed for a 4-year term, except that of those first appointed, one shall be appointed for a term of 1 year, one shall be appointed for a term of 2

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years, two shall be appointed for a term of 3 years, and two shall be appointed for a term of 4 years. Each member shall hold office until his successor has been appointed and qualified. Vacancies shall be filled for the unexpired term.

Members of the council shall serve without compensation but shall be entitled to be reimbursed for actual expenses incurred in the performance of their duties.

The commissioner may appoint such special advisory or technical experts and consultants as may be necessary to assist the council in carrying out its functions.

[12.] *14.* a. The commissioner shall prepare and submit to the Governor and the Legislature at least once during each fiscal year a comprehensive report on the administration of this act*, *which report may be contained in the general annual report of the department.*

b. The commissioner is authorized to request directly from any other department or agency of State Government information, suggestions and other data that may be needed to carry out his functions under this act; and such department or agency is authorized to furnish the information, suggestions or other data requested.

[13.] *15.* Nothing in this act shall authorize the commissioner or any other official acting under this act to restrict, determine, or influence the curriculum, program or ministry of any youth camp.

[14.] *16.* Nothing in this act shall be deemed to authorize or require medical examination, immunization or treatment for those who object thereto on religious grounds, except where such is necessary for the protection of the health or safety of others.

[15.] *17.* There is hereby appropriated to the Department of *[Labor and Industry]* *Health* the sum of *[$150,000.00]* *$100,000.00* or so much thereof as may be necessary to carry out the purposes of this act.

[16.] *18.* This act shall take effect immediately but remain inoperative for 120 days following enactment.

Chapter 375 P.L. 1973 - N.J.A.C. 8:25-1 etc.

NEW JERSEY YOUTH CAMP SAFETY ACT STANDARDS

Subchapter 1. Definitions.

8:25-1.1 Definitions

"Adult"	Means a person aged 18 years or older.
"Aquatics Supervisor"	Means adult in charge at a waterfront supervising swimming, watercraft activities, and related staff.
"Assistant Aquatics Supervisor"	Means adult in charge at a waterfront supervising swimming and watercraft activities in the absence of the Aquatics Supervisor.
"Aquatics Guard"	Means a person aged 16 years or older on duty at a waterfront for guarding or rescue purposes.
"Buddy System"	Means a pairing of campers to facilitate accounting of all children.
"Campsite"	Means land including natural features where the main camp facilities are located.
"Counselor"	Means a staff member 16 years or older.
"Department"	Means the New Jersey State Department of Health.
"Local Department"	Means a County or Municipal Department of Health, or a Regional Health Commission.
"Facility"	Means a structure including furnishings and installations on a campsite for living and program purposes.
"Youth Camp"	Means any parcel or parcels of land having the general characteristics and features of a camp as the term is generally understood, used wholly or in part for recreational or educational purposes and accommodating five or more children under 18 years of age for a period of, or portions of, two days or more and includes a site that is operated as a day camp or as a resident camp.

"Youth Camp Operator"	Means any private agency, organization or person, and any individual who operates, controls or supervises a youth camp, whether such camp is operated for profit or not for profit.
"Vehicle"	Means a carrier used in transporting children on public highways to and from camp or other places incidental to the camp program.

SUBCHAPTER 2. General Provisions

8:25-2.1 Modification and Waiver of Standard:

(a) Any person or his authorized agent, confronted with practical difficulties in carrying out the strict letter of any standard, may apply to the Department in writing for a modification thereof. Only a modification that will not constitute a definite hazard to life or property will be considered. The decision of the Department, including the particulars of the application, shall be entered upon the records of the Department and a copy thereof sent to the applicant.

(b) The Department may waive temporarily any standard to allow for experimentation and demonstration of new and innovative approaches to a camp program.

8:25-2.2 Site, Plans, Facilities, and Equipment:

(a) The location of a camp shall not present a fire, health, or safety hazard. The camp facilities built after enactment of these regulations shall not be divided by a major public highway or railroad.

(b) Camp structures and facilities shall comply with local building, zoning, and health codes.

(c) In new construction, an enclosed structure containing sleeping quarters in a resident camp shall be separated from all other such enclosed structures by a distance of not less than 25 feet.

(d) In a resident camp each child shall be provided with not less than 300 cubic feet of air space in sleeping quarters and a separate bed. There shall be not less than two feet of space between the sides of each bed.

If tents are used as permanent sleeping quarters not less than 30 square feet of floor space shall be provided for each camper.

(e) A room, tent, or building to serve as a health center shall be maintained on the campsite for the temporary isolation and treatment of sick or injured members of the camp community. This facility shall be protected from flies and insects; be located to insure privacy and quiet; and not located in or directly off the kitchen. It shall include first aid equipment and medical equipment supplies deemed necessary by the directing physician for the health and welfare of the camp. Hot water shall be available at this location.

This standard does not apply if campsite is operated as a day camp.

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(f) Equipment used in the camp program shall be of good quality and not present undue risk to children. Power equipment, especially that used for maintenance of the camp, shall not be stored, operated or left unattended without proper safeguards in camp areas.

8:25-2.3 Staff

(a) A camp shall have a written statement of personnel policies and practices. Staff members shall be informed of these policies, practices, and specific duties by means of a written job description of each staff classification.

(b) A Camp Director shall not be, less than 21 years of age and have not less than two years administrative experience in an organized camp.

(c) Hazardous camp activities, such as, aquatics, archery, horseback riding, riflery, and out of camp trips shall be conducted by a qualified adult activity specialist capable of implementing safety standards established by the Department, or other recognized body in the specialized field. He shall also have training or experience in conducting the activity.

(d) An adult leader assisted by a counselor shall be responsible for the care and supervision of every twenty children in the camp. The Camp Director shall not be included in this ratio in camps servicing over 50 children.

8:25-2.4 General Care of Children

(a) Policies and practices for discipline of a child shall be clearly stated and furnished in writing to all employees of the camp. A child shall not be deprived of food, isolated or subjected to corporal punishment or abusive physical exercise as a means of punishment either by staff or by another camper.

(b) Reasonable grouping according to age and the capabilities of each child shall be observed in all activities, including contact sports.

8:25-2.5 Records and Report

Records of personal data for each child shall be kept at camp when in session and shall include as a minimum: the child's name, age and address: the parent's or guardian's name, address, telephone number and where they or their designees may be reached in case of emergency; and the dates of admission and release.

8:25-2.6 Liability Insurance

Liability coverage shall be carried by the camp.

8:25-2.7 Sanitation and Fire Hazards:

The Department may require a camp to correct or eliminate any specific condition not described in these standards but which it deems necessary for proper sanitation or fire protection at the camp.

SUBCHAPTER 3. HEALTH

8:25-3.1 Medical Examination and Supervision:

(a) A camp medical program shall be under the direction of a physician and consultation for medical treatment shall be readily available. A written arrangement for emergency medical treatment shall be made with a hospital, clinic, or doctor's office as close as possible to the camp where children can be taken in case of serious injury or illness.

(b) The health staff of a youth camp shall have on duty in residence a licensed physician; or a registered nurse or licensed practical nurse complying with the rules of the State Board of Nursing; or a camp health director certified by the American Camping Association; or certified by the American Red Cross in Advanced First Aid and Emergency Care.

(c) A bound medical log listing date, name of patient, ailment, and treatment prescribed shall be maintained at the health center. If an injury or illness is serious, the camp physician shall be consulted immediately, and the parents or guardians when the patient is a child notified as soon as possible.

(d) A camp shall have a written outline of daily procedures for camper and staff health surveillance. If a child or staff member is suspected of having a communicable disease, he shall be isolated and medical assistance obtained.

(e) On or before October 1, of each year, every youth camp shall report to the Department all accidents resulting in death, injury and illness. This does not include minor injuries which require only first aid treatment and which do not involve professional medical treatment, loss of consciousness, restriction of activity or motion, or premature termination of the camper's stay at the camp.

8:25-3.2 Physical Examinations:

(a) A camper or staff member at the time of admission to a day or resident camp shall submit a written report of a physical examination performed by a qualified physician within the preceding 12 months. He shall also have protection against diphtheria,

tetanus, poliomyelitis, measles and rubella, or a statement from a physician that immunization is in progress. If there is a religious objection to physical examination or immunization, a child shall submit a written statement signed by the parents or legal guardians to the effect that the child is in good health and they assume the health responsibility for the child while in camp with the understanding they will be notified immediately if anything unforeseen occurs.

(b) A signed statement shall be required of each parent or guardian, in advance, giving permission to the physician selected by the camp director to hospitalize, secure proper treatment for, and to order injection, anesthesia or surgery for each camper.

(c) Required physical examination records shall be on file in the camp for review by the staff of the Department.

8:25-3.3 Nutrition and Meal Service:

(a) Food provided by the camp shall be of sufficient quantity and nutritional quality to provide for the dietary needs of each child.

(b) The current week's menu shall be posted in the food preparation area. Food substitutes shall be noted on the menus in writing. After use, the menus shall be kept on file for the period of the camping season.

(c) Mealtimes shall be scheduled to meet the children's needs and spaced so there are no excessively long periods without food. At least three meals shall be provided each day in a resident camp.

(d) Meals shall be prepared and served in an appetizing and sanitary manner. Meals shall be prepared as close to serving time as possible.

SUBCHAPTER 4. SAFETY

8:25-4.1 General:

Written emergency procedures shall be provided at a camp for emergency evacuation, fire, natural disasters, serious accident, illness or injury, and a lost camper. Each member of the camp staff shall be informed of his duties in case of an emergency. Fire and emergency drills shall be conducted at least once each camp period or every two weeks, whichever is more frequent.

8:25-4.2 Dangerous Substances:

Containers for gasoline and similar products, herbicides, insecticides, rodenticides or any material which might be hazardous shall be labeled and stored in a locked building not occupied by campers or staff. This building shall be located at a safe distance from occupied quarters.

8:25-4.3 Fire Fighting Equipment:

Regularly serviced fire extinguishers meeting the requirements of the Fire Underwriters Association shall be placed at strategic and easily accessible locations. Each fire extinguisher shall be inspected prior to the opening of camp and at periodic intervals thereafter for proper care and maintenance.

8:25-4.4 Fire Safety:

(a) A statement shall be obtained from the local fire authority or the State Fire Marshall certifying that the camp is in compliance with local and state fire regulations.

(b) The camp shall also conform to New Jersey Forest Fire Law N.J.R.S. 13:9-19.

"13:9-19. Burning waste or other material; permits. In any district for which firewardens have been appointed under the provisions of this chapter, no person shall set fire to or cause to be burned waste, fallows, stumps, logs, brush, dry grass, fallen timber or anything that may cause a forest fire, without first obtaining the written permission of the state firewarden, or a division, section or district firewarden. No such permission shall be granted by any firewarden, if, in his opinion, any forest or woodland will be endangered thereby; nor shall any such permission, if granted, relieve or exonerate any person from any penalties provided by this chapter, if by reason of such fire, any forest, brush land or salt marsh be burned. Permits shall not be necessary for burning any of the above enumerated materials when the fire is set a distance of not less than two hundred feet from any forest, brush land, salt marsh, or field containing dry grass or the inflammable material from which fire may be transmitted to any forest, brush land or salt marsh."

(c) Tents shall be made of fire retardant fabrics.

8:25-4.5 Vehicles and Drivers:

(1) A vehicle in good running condition shall be available at all times for use in emergency situations.

(2) A vehicle used for the transportation of children shall be capable of passing a New Jersey Division of Motor Vehicle Inspection.

(3) Operators of motor vehicles shall be licensed.

(4) At least one (1) adult or counselor, in addition to the driver shall ride with the children being transported when more than 20 children are transported in any one vehicle.

SUBCHAPTER 5. WATERFRONT SAFETY

8:25-5.1 Swimming Areas:

(a) A swimming area shall be maintained in a clean and safe condition, free from rocks, holes, and hidden dangers. Any known hazard in the vicinity shall be properly safeguarded and posted.

(b) The permanent swimming area of a resident camp or a day camp shall have a delineation of areas for non-swimmers, intermediates, and swimmers, in accordance with the standards of the American Red Cross, YMCA, or Boy Scouts of America.

(c) Lifesaving equipment shall be provided at a swimming area and placed so it is immediately available in case of an emergency. The equipment shall be kept in good working order and at a minimum shall include a bell or whistle, two assist poles, and a ring buoy firmly attached to sufficient line to reach the perimeter of the swimming area.

8:25-5.2 Waterfront Staff:

(a) The aquatics supervisor and assistant aquatics supervisor in a resident camp or day camp for swimming programs shall be currently certified as an American Red Cross Water Safety Instructor, a YMCA Aquatics Instructor, or a Boy Scouts of America National Aquatics Instructor.

(b) The aquatics supervisor, assistant aquatics supervisor, and aquatics guard in any camp who supervise wading, swimming or watercraft programs shall be currently certified as an American Red Cross Senior Lifesaver, a YMCA Senior Lifesaver, or a Boy Scouts of America Lifeguard.

(c) When swimming or watercraft activities are in progress, the aquatics supervisor shall be in attendance supervising the program.

(d) The aquatics supervisor is responsible for the procedures of waterfront supervision and they shall be strictly enforced. The aquatics staff shall not engage in recreational swimming or boating while on waterfront duty.

(e) The aquatics supervisor and one (1) aquatics guard shall be on duty for 20 or less children in the water. One additional aquatics guard shall be on duty for every additional 20 children or fraction thereof.

8:25-5.3 Swimming Procedures:

(a) American Red Cross, YMCA, or Boy Scouts of America tests shall be used to determine each child's swimming ability. Children shall be confined to an area equal to the limits of their swimming skills or an area requiring lesser skills for which they have been classified.

(b) A method of supervising and checking bathers shall be established and enforced. Recommended methods are the check or buddy board, the buddy system, the colored cap system or any combination of these. The system used shall be supervised during swimming periods by a member of the aquatics staff and checks shall be conducted not less than every ten minutes. A written "lost swimmer" plan shall be established and all staff shall know exactly what their duties are in case of an emergency at the waterfront. A "lost swimmer" drill shall be held at least every two weeks.

(c) Swimming is prohibited at sites other than the permanent camp waterfront without prior approval of the camp management.

8:25-5.4 Watercraft and Waterskiing:

(a) Watercraft activities shall be conducted during day-light hours and supervised by the aquatics supervisor. A Type 1 Personal Flotation Device shall be provided for each occupant of a watercraft. A non-swimmer shall wear a Type 1 PFD and not be permitted in a sailboat unless accompanied by a Certified Senior Lifesaver. A camper or staff member shall wear a Type 1 PFD while in white water or on a lake when the water is rough, or while waterskiing.

(b) During a watercraft activity period, an aquatics guard shall patrol the watercraft area in a life-boat. A watercraft docking area shall not be in the swimming area.

(c) The swimming area shall not be used for the launching or stopping of waterskiers.

SUBCHAPTER 6. SANITATION

8:25-6.1 General Provisions:

(a) A campsite shall be located on land that provides good natural drainage or be properly drained. Children shall be protected from hazardous areas such as traffic, cliffs, sinkholes, pits and abandoned excavations. These areas shall be guarded or posted to eliminate the possibility of accidents.

(b) A camp building shall comply with applicable. local building, plumbing, electrical and similar codes.

(c) A tent used for sleeping and living purposes which remains in one location for more than two weeks shall be provided with a floor which is level, easily cleaned and in good repair.

(d) Sleeping quarters shall be convenient to toilet facilities. A room arrangement shall not be such that access to a sleeping room is only by going through another sleeping room, bathroom or water closet compartment.

8:25-6.2 Heating:

(a) Heating equipment when supplied, shall be capable of maintaining a temperature of at least 68 degrees Fahrenheit at a point three feet above the floor, when the outside temperature is 0 degrees Fahrenheit. An accurate thermometer shall be provided. A portable heating device or space heater shall not be used.

(b) Fireplaces, hot water and steam radiators, and pipes shall be shielded to prevent burns.

8:25-6.3 Lighting, Ventilation and Screening:

(a) The minimum total window or skylite area measured between stops for every habitable room shall be 10 percent of the floor area of such room. Forty-five percent of this minimum window or skylight area shall be openable.

(b) During fly season each door, window and other opening to the outside used for ventilation purposes of a building occupied by campers shall be supplied with a screen of not less than 16 mesh. Each screen door shall swing outward and have a self-closing device in working condition.

8:25-6.4 Sewage Disposal:

Any toilet or receptable for human excrement shall be constructed and maintained so that flies cannot gain access to the excremental matter contained therein and such excremental matter shall at all times be prevented from falling over or upon the surface of the ground and shall be prevented from gaining access to any of the waters of the State. This provision also applies to wastes resulting from water closets, laundry tubs, washing machines, sinks, dishwashers or any other source of water-carried wastes of human origin or containing putrescible material.

8:25-6.5 Garbage Disposal:

All garbage and rubbish shall be stored and disposed of in such manner that flies and rodents are not attracted or furnished breeding places, or that air pollution will be created. Refuse shall be removed from camp as required by local regulation, but not less than twice a week. If this is not possible, it shall be completely burned in a proper manner in an incinerator or buried. If buried, an earth cover of six inches shall be provided. Final cover shall be two feet.

8:25-6.6 Toilets, Lavatories, Showers:

(a) Conveniently located and properly designated toilet facilities shall be provided for each sex. Where flush type toilets are employed, waste shall be disposed of in accordance with local requirements. Properly constructed and located privies or chemical toilets may be permitted. In resident camps, one toilet or privy seat shall be availfor every ten female occupants of the camp. In resident camps occupied by males and where urinals are used, one toilet or privy shall be provided for every fifteen occupants and one urinal or equivalent for every thirty occupants. Toilets shall be supplied at all times with toilet tissue. Hand washing facilities shall be provided in close proximity to toilets, privies or urinals.

(b) Day Camps shall provide one toilet seat for every 20 persons, or if an all male camp, one toilet seat and one urinal or the equivalent for every 30 persons.

(c) The use of a common towel shall not be permitted. Means shall be provided to enable the use of showers by campers as well as by camp staff. Showers shall be supplied with hot water. The floors, walls and fixtures of showers shall be constructed of durable and easily cleaned material. The shower requirement does not apply if campsite is operated as a day camp.

8:25-6.7 Food Service, Milk Supply & Water Supply:

(a) All food service, milk, and water supply shall comply with Chapter XII of the New Jersey State Sanitary Code, (N.J.A.C. 8:21-2) and (NJSA 26: 1A-9).

(b) Drinking Fountains:

Drinking fountains, if provided, shall be contructed of impervious material and have an angle jet with a nozzle above the overflow rim of the bowl. The nozzle shall be protected by a nonoxidizing guard. The bowl shall be of easily cleanable design, without corners, and the bowl opening shall be equipped with a strainer. Wastewater from the bowl shall be discharged to a suitable drain by means of a pipe with a suitable air gap.

8:25-6.8 Insect, Rodent, and Weed Control:

(a) Rules Concerning Insects Include:

1. Campsites shall be kept free from cans, jars, buckets, old tires and other articles which may hold water and provide temporary breeding places for mosquitoes. Mosquito control measures and supplemental larvicidal measures shall be undertaken by the owner when the need is indicated.

2. Fly breeding shall be controlled by eliminating the insanitary practices which provide breeding places. Refuse containers shall be repaired or replaced when so damaged that they leak. The area surrounding the containers shall not be permitted to become littered with garbage nor saturated with waste liquid from garbage. All refuse containers shall be maintained in a clean and sanitary condition.

3. Insecticidal measures shall be applied if necessary.

(b) Rules Concerning Rodents Include:

1. All buildings within the camp shall be rat-proofed, with special emphasis on those in which food is stored or served.

2. Storage areas shall be maintained in such a manner as to eliminate the possibility of rodent harborage.

(c) The growth of weeds within each campsite shall be controlled as a means toward the elimination of ticks and chiggers. Poison ivy, poison oak, and poison sumac shall be controlled within each campsite.

8:25-6.9 Swimming and Bathing

(a) Swimming Pools:

Swimming pools shall conform to municipal ordinances, statutes and applicable regulations governing their construction and operation. In the absence of the same they shall conform to the provisions of the Swimming Pool Code of New Jersey (1970) as approved by the State Department of Health for adoption by reference by local boards of health.

(b) Rules Concerning Natural Bathing Waters Include:

1. Natural bathing waters, such as rivers, lakes and inland waterways shall not exceed a coliform density indicating a Most Probable Number of 2400 per 100 ml.

2. Bathing waters shall be sampled and evaluated at least once each month during June, July and August of each year.

3. Toilet facilities shall be provided within a reasonable distance of the bathing area.

8:25-6.10 Farm and Domestic Animals:

(a) A horse or other farm animal shall not be permanently quartered within 100 feet of living quarters, kitchen, or mess hall.

(b) Manure shall not be allowed to remain more than 24 hours at any location wherein or whereon horses or other domestic animals are kept. Fly repellent and other precaution shall be used to prevent such place or location from becoming an attraction for or breeding place for flies.

(c) Drainage from stables and temporary quarters for horses shall not be permitted to flow into a spring, stream or lake.

(d) A horse, dog or other domestic animal or pet shall not be permitted on a bathing beach or in the water in the area used for waterfront activities.

8:25-6.11 Maintenance:

(a) A campsite shall be maintained in a clean, sanitary and safe condition.

(b) A roof, exterior wall, door, skylight and window shall be weathertight and watertight and shall be kept in sound condition and good repair.

(c) Floors, interior walls and ceilings shall be sound and in good repair and maintained in a clean and sanitary condition.

(d) All plumbing fixtures, water and waste pipes shall be maintained in working condition, and kept clean.

(e) A water closet compartment, bathroom and kitchen floor surface shall be maintained so as to be reasonably impervious to water and to permit the floor to be easily kept in a clean and sanitary condition. Floor finishes should be of non-slip material. A floor shall be cleaned not less than once a day and kept in good repair.

(f) Recreational equipment, including playground devices, shall be inspected periodically for defects. Proper maintenance shall be carried out to keep it in a safe operating condition.

4. Supplementary Materials

NATIONAL BOARD OF THE YWCA OF THE U.S.A.

Statement on Camp Safety legislation presented
for inclusion in the record of Hearings before
the Senate Subcommittee on Children and Youth,
Senator Walter F. Mondale, Chairman.
July 15, 1974

Legislation under consideration:

S. 3639 - "The Children and Youth Camp Act"
S. 1830 - "The Youth Camp Safety Act"

The National Board of the YWCA appreciates the opportunity to speak in support of efforts to develop effective minimum safety standards for all camps.

As long time members of the American Camping Association, we support the main thrust and intent of this legislation and the recommendations of the ACA with respect to further strengthening and implementation of these bills.

The YWCA was a pioneer in camping for young women beginning in 1874 with the first vacation program for industrial women, opened by the Philadelphia Association in Asbury Park, New Jersey. In addition to these popular camps for young workers, we began organized camping for teen age girls in 1909, and for younger girls in 1912. Through all of these years our concern for a maximum environment of health and safety has led us to join in setting standards. The first YWCA Camp Standards Manual was published in 1924. Since the development of the American Camping Association we have urged membership and participation in ACA standards by all YWCA camping programs.

The wide range of sponsoring groups, the new forms of camping, and the large number of children and adults involved has accentuated the need for federal and state action to protect health and safety.

The YWCA's original experience in providing camps for low paid industrial women has been a continuing impetus in our history. Today, we are even more aware of the large numbers of youth and adults denied access to healthful outdoor recreation and leisure, especially those in the inner city. At the same time, the preservation of our shrinking open space and the high cost of maintaining it, especially near our large cities, provides peculiar problems for camping. The challenge in providing fair and equitable camp safety standards is to protect health and safety without making camping prohibitive for large numbers of our citizens.

We urge that legislation aimed at minimum federal safety standards:

- Be inclusive of all forms of camping, public and private.

- Encourage the development of higher standards without jeopardizing the access of low income and inner city youth and adults to camping programs because of excessive costs.

- Provide for fair hearings, with provision for preliminary review short of costly litigation.

- Make maximum use of the highly qualified professionals in the camping field in national and state advisory committees and in the setting of standards.

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1974 NATIONAL STANDARDS FOR SCOUT CAMPS OF THE BOY SCOUTS OF AMERICA

This booklet includes procedures and standards along with explanatory information. The scoresheet is separate and is to be used in making the report to the council. Inspectors' recommendations are to be attached to the scoresheet. Items needing follow-up are to be recorded.

PURPOSE

These standards are established to encourage each council to take an honest look at its facilities, equipment, staff services, and program. There is no crime in being rated less than perfect. The real crime is to be so anxious for a perfect rating that weak spots are glossed over. Face up to the needs; if the answer is doubtful, rate a "no" score and take steps to correct the deficiency so there can be no doubt.

As a result of this analysis and rating the council should be able to:

- make an objective review of its camping operation, covering adequacy of present facilities and need for expansion, as well as a complete appraisal of staff and program
- discuss the year-round camping program and the camp as a year-round training area for units and leaders
- establish a written report for executive board action, complete with recommendations that can be used as a guide to measure future progress

NOTE: If this is a multiple-camp reservation, complete this rating for each camp. When the reservation provides certain central facilities for all camps, rate them and apply same rating to each camp.

HOW TO GO ABOUT IT:

Part I — Certification of Mandatory Standards and Precamp Inspection should be completed 30 to 60 days before summer camp opens, inspection party to include the council camping chairman, health and safety chairman, camp director, Scout executive, plus other committee members and staff as needed. Compliance with the first 26 items is to be certified by the council representatives and sent to the regional office at least 30 days before camp opens. The regional rating representative will review the Mandatory Standards at the time of rating Facilities and Operating Standards while the summer camp is operating. The regional representative should have a copy of the precamp certification filed by the council.

Part II — Facilities and Operating Standards—To be reviewed and appraised during camp operation.

1. Secure a representative committee (including chairmen and members of the camping and health and safety committees, the council president, the Scout executive, the camp director, and the regional representative) to make up the appraisal team.
2. Documents, maps, and plans listed here are to be gathered at camp in advance of the summer program analysis and reviewed by the appraisal team before touring the camp.
   - Development plan for this camp—board adopted (camp should have a copy on display or work copy available for use of camp director)
   - Conservation plan—as prepared by a government agency or qualified technician (this is a working plan from which is drawn projects for boys)
   - Job specifications, staff manual, or copies of letters of employment in which jobs are specified
   - Camp operating budget
   - Inventories of all equipment
   - Trading post records required in camp
   - Camp control map or maps—showing locations of all facilities, utilities, roads, trails, etc.
   - Letter of agreement with local hospital
   - Letter of agreement with fire department or other related agency
   - Record of water tests

- Certification of Mandatory Standards and Precamp Inspection (regional office to provide copy of the council's certification)
- Maintenance plan and schedule
- Troop leaders' guide
- Menu
- Conservation projects
- Written plans to meet emergencies in camp

The following reference manuals are to be available to the inspection party:

Aquatics Program, No. 12003
Camp Business Management and Commissary Operation, No. 12005
Camp First Aid Log, No. 3678
Camp Health and Safety, No. 3692
Field Sports, No. 12020
Managing the Council Outdoor Program, No. 12001
Summer Camp Program, No. 12002

3. Make a tour of the camp facilities, using this form as a guide. Maintain high standards. Take time to do a good job. Insist on immediate action to correct critical items affecting the health and safety of campers and staff.
4. Observe the use of equipment, methods of instruction, use of personnel, and any obvious indications of Scout ideals in action. Talk with leaders and boys on the tour. Discuss program with the program director and staff members.
5. It is recommended that a conference be held with a representative group of Scouts and Scouters to comply with item 117.
6. Meet with the local committee and make out a final analysis and rating for the camp, including recommendations and comments. Complete the scoresheet.
7. Chairmen of camping (and activities) and health and safety committees should make a report to the council executive board—preferably at camp in connection with this camp appraisal.
8. Regional representative sends scoresheet and rating with recommendations to the council with copies for the regional management center and Camping and Engineering Service.

RESPONSIBILITY

Assigning responsibility is not neat and clear—most often it is a team job. In almost all instances the Scout executive with the camping committee must be held accountable to see that standards are maintained.

Part I — The camping committee and Scout executive have the responsibility to ensure that all mandatory items are or will be in effect as camp opens. We identify this in the columns to the right of each standard. In some instances, the camp director must administer the operating part of the standard.

Part II — The same principle of assigned responsibility is applied to the items in Part II.

MANDATORY STANDARDS

Standards required before a camp opens are Mandatory Standards. They include such items as tested drinking water, milk supply, refrigeration, physical exams, medical inspections, health log, latrines, waste disposal, state and local permits or licenses, precamp health, safety, and sanitation inspections.

All items marked with an asterisk (*) must be met. Failure to meet any one item will be cause to take action to close the camp.

The local council camping committee with the Scout executive is to provide for meeting these standards before a camp is opened. Mandatory items should be checked during the precamp inspection conducted by council camping and health and safety committees prior to the opening of camp. These Mandatory Standards are also to be reviewed by the regional appraisal team during the annual inspection.

Exceptions: Any exceptions to these first 26 Mandatory Standards must be identified in writing when the Precamp Inspection and Certification to Mandatory Standards is filed 30 days prior to camp opening.

Precamp inspection by the council health and safety committee with the camping committee is designed to help identify facilities and equipment that need to be brought up to standard before camp opens. Those camps that are weather-bound should file the precamp inspection as requested and indicate when precamp inspection will be completed. Ideally, camps that are weather-bound until late spring should do the precamp inspection in the fall and carry out essential corrective action before weather closes the site.

RATINGS AND RECOGNITIONS

"A"—NATIONAL STANDARD CAMP FLAG

____ Meets all Mandatory Standards (only exceptions are legitimately excused items)

____ Meets all of the standards identified with an asterisk (*) in Part II

____ Meets 85 percent of all standards in Part II (at least 77 of the 91 including the items marked with an asterisk).

"B"—NATIONAL INSPECTED CAMP CERTIFICATE

____ Meets all Mandatory Standards (only exceptions are legitimately excused items)

____ Meets 85 percent of the items in Part II

"C"—LETTER OF INSPECTION

____ Meets all Mandatory Standards (only exceptions are legitimately excused items)

____ Meets less than 85 percent of the items in Part II

Region sends a letter identifying the areas needing correction. This is really an unsatisfactory rating. The camp is meeting the minimum standards. Every effort must be made to improve by next year.

EXCUSED ITEMS

Items may be excused only when conditions beyond control of the council prevent compliance. Examples:

a. Local regulations prohibit use of rifles: Mandatory Standard 23 would be marked "E" for excused. Same for Part II, items 97, 98, 99, and 100. These items would be counted as "yes" in final tally.

b. In a high mountain camp where swimming is not feasible those items related to aquatics would be marked "E" for excused. Mandatory items 11, 12, and 25 and Part II items 59, 89, 90, 91, 92, 93, 94, and 95 would be "E" and excused in final rating.

SCORING

The Camp Inspection Worksheet, No. 113, is used for scoring in conjunction with the inspection guide National Standards for Scout Camps of the Boy Scouts of America, No. 20-111, while inspecting a Scout camp. This field worksheet should be used to record the results of the inspection while the inspection is in progress. Once the inspection is over, the results on this scoresheet should be transferred to the National Standard Rating 1974 Information and Scoresheet, No. 20-112, for the official report to the Camping and Engineering Service, Boy Scouts of America, North Brunswick, N.J. 08902.

PRECAMP CERTIFICATION OF MANDATORY STANDARDS

This statement properly signed is to be filed in the regional office at least 30 days prior to opening of the camp. It is the council's commitment to operate a safe camp under qualified leadership, and is signed by the council president, camping and health and safety chairmen, and the Scout executive.

Exceptions, if any, are to be documented when certification is filed. This covers the first 26 items. Items marked "E" for excused must be documented. Failure to meet Mandatory Standards, minimum to safe camp operation, requires corrective action.

PART I—MANDATORY STANDARDS

(To be certified by the council before camp opens and reviewed by the regional representative. Note that items marked with an asterisk (*) are required. Failure to comply is cause for instituting action to close the camp as defined at the end of this section.)

	RESPONSIBLE		
	Camp Committee	Scout Executive	Camp Director
*1. A precamp inspection was conducted by the camping committee and health and safety committee.	●	●	
Use the Precamp Inspection Checklist, No. 19-134, provided by the Health and Safety Service. Inspector reviews report. Standards are met when council shows evidence of corrective action taken. If inspection is inadequate or not complete, the council must carry out inspection within one week and file report with the area director. The Precamp Inspection Checklist is to be sent to the regional management center with precamp certification at least 30 days before camp opens. Certification must include the standards of the Occupational Safety and Health Act commonly known as OSHA.			
*2. The camp possesses all required local and state permits or licenses in valid condition.	●	●	
In lieu of any local or state requirements as related to items dealing with health and safety, sanitation, and equipment operation, standards are set forth in BSA manuals. OSHA-required posters and state and local permits are properly displayed. If not done, make arrangements to comply while inspectors are in camp.			
*3. A complete physical examination or certification of fitness signed by a licensed physician within 12 months and a health history including limitations filled in by parent or guardian before camp is required for all campers and staff. It is on file in camp during the period.	●	●	●
To comply, no new campers or leaders are to be accepted without meeting this standard.			
*4. On arrival in camp everyone is given a medical inspection by a physician or is screened by an adult approved by the camp physician.	●	●	●
With approval of medical advisers on the council health and safety committee, medical screening may be conducted by nurses and other nonmedical persons who are selected and trained by the camp physician. The only recheck examinations, which must be given by a physician, are those required when need for medical treatment or advice is found at the time screening is conducted. Medical attention for this small group (usually less than 5 percent) can be given by a physician at camp or by transporting those needing this recheck to a place nearby where a physician can see them. Physical limitations are noted and leaders are so informed. Screening process defined in Camp Health and Safety, No. 3692, is followed. To comply, procedure must be used with next group of new campers.			
*5. A daily record of all first aid and medical treatment is kept in a bound page-numbered logbook.	●	●	●
A bound, sewn (not looseleaf), page-numbered logbook of all cases treated in the health lodge is required. Medical supervisor checks the log during his scheduled visits. The camp director should see this record daily. Use Camp First Aid Log, No. 3678. To meet OSHA standards maintain a separate log for staff and council employees. To comply, this procedure must be established immediately.			

	RESPONSIBLE		
	Camp Committee	Scout Executive	Camp Director
*6. Appropriate medical emergency transportation is available in camp at all times.	●	●	●
Emergency transportation needs to be available at all times, but does not need to be in waiting for this exclusive use. Alternate transportation can be used and so designated. To comply, this service must be assured before the regional inspector leaves camp.			
*7. A licensed physician is on call at all times when the camp does not have a resident physician.	●	●	
A licensed physician is responsible for general health supervision and has accepted this responsibility. He may live nearby. There is a schedule of supervisory visits to camp to confer with the nurse or first-aider. He is available on call. A resident physician would, of course, satisfy this requirement. To comply, arrangements for this service must be made before the inspector leaves camp.			
*8. First aid is given by a trained person. (check)_____ nurse (RN) _____ nurse (LPN) _____ medical student _____ certified first-aider _____ physician.	●	●	
His or her qualifications must be approved by health and safety committee and health supervisor. Must be 21 years of age or more. To comply, arrangements for this service must be made within 24 hours.			
*9. There is a current written agreement or exchange of letters with a nearby hospital regarding procedure for admitting campers and providing for financial arrangements.	●	●	
If the hospital will not write, then all oral agreements must be verified by a letter of understanding that the Scout executive or camp director writes to the hospital authorities. A current copy of this letter should be at the health lodge, in the camp director's file, and in the council office. It should verify the fact that all emergency cases will be promptly accepted by the hospital and that the health and welfare of boys will have primary consideration. It should also define arrangements made for settlement of financial obligations. This letter is to be reviewed by the regional representative. To comply, this standard must be met within 24 hours of the regional inspection.			
NOTE: A map showing shortest and best route to camp is to be given to the hospital and ambulance service.			
*10. Written plans for handling major emergencies such as floods, severe storms, fires, major accidents, and health emergencies, including environmental safety precautions, are posted in the camp office and are shared weekly with the staff and troop leaders.	●	●	●
Plans for handling emergencies are to be specific as to person in charge, alternates, action to be taken, whom to notify, routes to follow, etc. Environmental safety precautions are to be posted daily and where conditions apply will include safety measures such as:			
• Limitation on hiking in high temperatures and high humidity			
• Limitation of physical activity during smog alert			
• Protective measures during lightning storms, tornadoes, and hurricanes			
• Limitation of physical activity as necessary in high altitude camps			
• Limitation of aquatic activity as dictated by lightning, small-craft warnings, or high water			
All staff and troop leadership are alerted to the preventive measures and the measures are enforced. To comply take immediate steps to produce plans and procedures and to meet this standard.			

	RESPONSIBLE		
	Camp Committee	Scout Executive	Camp Director
11. Proper BSA standards for instruction, supervision, and safety training are carried out in the aquatics program including use of boats, canoes, and all aquatics facilities and equipment and comply with all state and U.S. Coast Guard regulations.	●	●	●

Boating-and-canoeing area is separated from swimming, and the buddy checkout plan is used. Life jackets are in each craft and are used according to state, Federal, and BSA regulations. Waterfront is properly designed and equipped according to the standards in Aquatics Program, No. 12003. Qualified supervision is provided when the waterfront is used. Failure to meet standards is cause to close waterfront activity.

*12. The buddy plan is used at all aquatics, boating, and canoeing activities.	●	●	●

The buddy plan is a must whenever boys swim, boat, or canoe, and in all aquatics activities. To comply institute buddy plan immediately.

*13. All dishes and cutlery are properly washed, disinfected, and dried according to BSA standards as defined in Camp Health and Safety, Chart No. 12018 is posted daily. A sanitizing agent is required in patrol dishwashing, but no temperature chart is needed.	●	●	●

High standards in dishwashing must be maintained whether in a central facility or patrol sites. Standards set in these items are self-evident. Rinse-water temperature charts should be kept posted. (This does not apply to patrol cooking.) Plastic dishes require high-temperature rinse water of at least 170 degrees with an additive to reduce surface tension of the water to reduce drying time. Local health officers should approve any chemical compounds used for sanitizing purposes. The sanitizing of eating utensils at patrol sites is satisfactorily accomplished by heating rinse water and using sanitizer tablets recommended by BSA. All dishes must be air dried.

*14. Equipment to maintain milk and other perishable foods at a temperature of not over 45 degrees under sanitary conditions is installed in camp and is in good operating condition.	●	●	●

During summer operation, temperature charts must be posted and maintained daily. No perishable foods are to be kept on patrol cooking sites. To comply, corrective action must be taken within 24 hours.

*15. Only powdered, canned, or pasteurized milk is used.	●	●	●

Whether in the camp kitchen or on the trail, special care must be taken when reconstituting powdered milk. Water must be from a tested supply or must be properly treated. Container in which milk is mixed must be sanitary. Reconstituted milk must be used promptly and must be handled the same as fresh milk. To comply, immediate steps must be taken to correct.

*16. Drinking water is from an approved source, is tested regularly this season for bacteriological quality, and meets state and local health department standards. (Produce certification.)	●	●	

A sanitary survey of the camp water supply and bacteriological tests must be conducted in advance of opening date so report is cleared before camp opens. Samples should be collected and laboratory tests made in accordance with requirements of state and local health department regulations. Periodic bacteriological tests should be made throughout the season (at least once each month). A careful sanitary survey of the source of the water supply is the key preopening

	RESPONSIBLE		
	Camp Committee	Scout Executive	Camp Director

step. State and local health authorities and regulations should be used to guide the council in establishing local procedures. A record of all laboratory tests made should be maintained.

If the water supply is chlorinated, tests for residual chlorine content should be made regularly (at least once a day) and a record kept of the test results. Immediate steps must be taken to provide safe drinking water.

*17. All boilers and pressure tanks are inspected and equipped with tested and operable safety valves. ● ●

To comply, correct within 48 hours and report to region.

18. All motor vehicles used by the camp are kept in safe mechanical order and operated in a safe and legal manner, including use of private cars and buses (not trucks), for transportation of passengers. Vehicles meet all state pollution emission requirements. Motorboats and other water craft meet U.S. Coast Guard or local standards. ● ● ●

Trucks, service vehicles, and passenger cars used in connection with camp must be in good mechanical condition for safety's sake. Brakes, wipers, lights, steering, horn, and tires should be checked by a competent mechanic. Those staff members authorized to drive camp vehicles must have mature, good judgment and be properly licensed according to state law. No passengers are transported in trucks, except in the cabs. This applies to ALL vehicles licensed or unlicensed. State inspection standards apply to all vehicles.

When motorboats are used for transporting campers or visitors to and from camp, boat safety rules, state and Federal laws, and U.S.Coast Guard standards must be followed.

*19. All toilets or latrines meet local or state requirements. Stools or latrine boxes are clean, vented, and free from flies. Latrine seat covers are self-closing (exception for flush toilets). ● ● ●

Cleanliness of latrines is vital to the health of campers. Rigid standards in cleanliness, fly and rodent control are essential. A supply of toilet paper is available. An acceptable night light is attached to structure. Vents are screened. Self-closing lids are fly tight. Correct all latrines that do not meet these standards within 24 hours.

*20. Garbage and refuse disposal meets BSA standards as defined in Camp Health and Safety manual, No. 3692, or meets local regulations, whichever are higher. For patrol cooking, check waste-water disposal in all troop sites and solid-waste pickup system. ● ● ●

Check garbage disposal if located at the campsite. Concrete slab garbage platform with hot-water outlet and proper drainage plus clean, covered cans are essential, as is daily disposal of all waste. Be familiar with state and local sanitary codes. Waste disposal standards on troop sites must be enforced. Standards are met when:

- Garbage and other waste are stored in fly-tight containers.
- Area is clean and fly control is adequate.
- Garbage-and-waste disposal method is accepted by the local health officer or it is removed to an approved sanitary landfill or adequately handled by digestion pit or is buried under clean soil or is hauled away by contract.
- Rodent control is adequate.

	RESPONSIBLE		
	Camp Committee	Scout Executive	Camp Director
To comply, immediate steps must be taken to meet these standards and must be approved by regional personnel.			
*21. The local fire company or warden has checked facilities in case of possible call and has submitted written recommendations or has on file a reconfirming letter.	●	●	
The agreement should be in writing or the oral agreement must be confirmed by letter. A copy of this document must be available to the regional representative. To comply, arrangements must be made within 48 hours and a copy of the agreement sent to the regional management center.			
*22. The troop fireguard plan is in effect on troop sites and fire tools and equipment as agreed upon with local fire authorities are in troop and camp commissioner areas and one or more places in the central camp area—ready for use. If fire permits are required, they must be posted.	●	●	●
If fire permits are required they are posted. Local fire authorities should establish the location and type of fire equipment. Fire drills are to be held at least once a week. Each troop should follow the troop fireguard plan as published by the BSA. Troop bulletin boards include posted Troop Fireguard Chart, No. 3695, with assignments made. All fire extinguishers are of the right type and properly placed. Inspection date is current on each one. To comply, immediate arrangements must be initiated to make the troop fireguard plan effective. Fire tools are to be placed in proper locations within 72 hours and certified in writing to the region.			
23. The official BSA certificate for conducting a marksmanship instruction program has been issued and is displayed at the range. (If there is no range, answer this question with a "no" (E) and excuse in final rating.) (Precamp inspection checks physical layout only.) TO BE CERTIFIED BY REGIONAL REPRESENTATIVE AT TIME OF APPRAISAL.	●	●	●

To: National Health and Safety Service

We have observed this marksmanship instruction program in operation and hereby recommend that its certification should be renewed for the current year. It meets BSA standards as checked herewith. We have, therefore, endorsed the range certificate for 19_____ and signed below.

Physical layout

Rifle trigger pull no less than 3 lbs. (written certification by local police, NRA instructor, or gunsmith)

Operation, including locked storage of guns and ammunition

Trained instructor, at least 21 years old with instructor's certificate, in constant attendance

Signed _____ Position_____ Date _____

Prior to the opening of camp the council health and safety committee is to inspect the entire range, review operating practices, qualifications of range officer, and give its approval for operation. The regional camp inspection team then certifies that there is complete compliance in layout, operation, and supervision before official approval and certification. Refer to Field Sports, No. 12020.

	RESPONSIBLE		
	Camp Committee	Scout Executive	Camp Director
All rifles are to be checked for proper trigger pull, and instructor must be 21 years of age or more. CO_2 rifles used on approved ranges are an acceptable substitute for the standard .22-caliber rifle range. Check state law first.			
24. Camp director is a male at least 21 years of age and holds a BSA National Camping School certification (management). He has at least two seasons of prior administrative or supervisory experience.	●	●	
In the case of multiple camp reservations, camp directors qualify if they have management or program director certification. In this case, the reservation director must hold the necessary management certification. Camp director is at least 21 years old with National Camping School certification in management plus 2 years of experience. Certification can be expired. *Experience may be in such positions as business manager, commissary operation, Scoutcraft skills, program director, camp commissioner, aquatics director, etc. Item 57 calls for current certification and two seasons of prior experience in order to be rated as a National Standard Camp. To comply, regional personnel must make a judgment on the acceptance of a camp director who is not trained as defined. If incumbent is not qualified, the council must secure a suitable replacement or backup supervisor who is qualified.			
25. Aquatics director is a male 21 years of age or older and holds aquatics administration certification from a BSA National Camping School or Red Cross Water Safety Instructor Certification.	●	●	
To comply, the aquatics program must be limited to supervised, troop Safe Swim Defense swimming.			
26. All full-time camp staff members are registered members of the Boy Scouts of America or are approved international counselors.	●	●	●
If not currently registered, all staff members must be registered by the council as "Camp Staff Member," which is an authorized title. Positions of nurse, cook, dietician are approved roles for women to fulfill on Scout camp staffs. To comply, take immediate steps to clear registrations for those not registered.			

ACTION TO CLOSE A CAMP — PROCEDURE

A council that ignores or fails to take corrective action on one or more Mandatory Standards will be requested to close the program area so affected until corrective action is complete. Standards essential to the health, safety, and welfare of all campers are marked with an asterisk (*). If these standards are not met, the council may be advised to close the camp until corrective action is taken.

When a camp (council) fails to take corrective action within the time limits on standards related to the health, safety, and welfare of all campers, the following steps will be immediately initiated by the regional office:

1. The regional director and regional representative arrange for a meeting of council officers including the Scout executive, chairmen of the camping and health and safety committees, with one regional camp visitor and a regional staff member.

   Purpose: To identify the area or areas not in compliance and agree on corrective action if possible or to act on closing the camp.

   Timing: This meeting is to take place at termination of compliance date.

2. The regional director calls Field Operations office, which notifies the manager of Camping and Engineering Service, who may on the request of the region have a member of that service assigned to assist the region and the council to bring the council camp up to standard.

3. Corrective action is taken and approved by the region, or by mutual agreement the camp is closed.

PART II—FACILITIES AND OPERATING STANDARDS

(Items marked with an asterisk (*) are required for the National Standard Rating.)

TROOP SITE FACILITIES

	RESPONSIBLE		
	Camp Committee	Scout Executive	Camp Director
27. (a) All troop campsites are well isolated from each other. (b) The rotation plan for site use is practiced where advisable. (See Engineering D66 Sheet.) Mark "yes" if both (a) and (b) are checked.	●	●	

Troop sites are at least 450 feet from center to center and have 10 or more patrol sites that are used on a rotating basis. Campsite (troop and patrol) separation is important to the environmental management of valuable camp property. Separation reduces the impact of heavy use in concentrated areas. Rotating use of sites provides for recovery of ground cover. When rotation is not practical, troop and patrol sites must be treated for heavy use.

*28. Separate campsites are provided for all troops regardless of size.	●	●	

Troops in camp, whether chartered or provisional, need the privacy of their own campsite. Separation as defined in item 27 provides this privacy and permits troop and patrol leadership to function without outside interference. Exceptions may be made for two small troops to occupy the same site when it provides the separation defined in item 27.

*29. All troop campsites have separate patrol areas that are equipped with sheltered tables and benches. Patrol cooking sites include food box, fire spot, and smoke fly.	●	●	

A table and benches with a tarp shelter are required on each patrol site. For patrol cooking a smoke or cooking tarp is required to shelter the fire spot and food box. These shelters provide shade, protection from rain, and a place for Scouts to sit, plan, and carry out some program activities.

*30. All troop campsites have flagpoles on which the U.S. flag is displayed when the troop is in camp.	●	●	●

Daily flag raising and lowering ceremonies conducted by Scouts on the troop site are a part of the program.

31. All troop campsites have areas for troop campfires (excused where not permitted).	●	●	

Troop campfires are essential and exciting experiences for Scouts in camp. Their success depends on suitable locations for safe campfires with proper seating and an attractive setting.

32. There is at least 30 square feet of floor space (sleeping area) provided for each camper.	●	●	

Two-boy tents are recommended. Each camper must have his own sleeping area (cot, pad, or bunk) with 30 inches or more between heads. Head-to-foot sleeping is recommended.

*33. Hand-washing facilities are located near toilets.	●	●	

Running water is nearby. Scouts are instructed to wash hands after using latrines. In primitive situations a tank with a spigot can satisfy this standard.

	RESPONSIBLE		
	Camp Committee	Scout Executive	Camp Director
*34. Each troop site has its own drinking and washing water and toilet facilities.	●	●	

Latrine and washstand is centrally located in the troop site. Running water is supplied to the washstand. Drainage is good and there is evidence of good housekeeping.

FOOD SERVICE

*35. Refrigeration units are clean and sanitary and all food is covered. A temperature chart, No. 12017, is posted daily. Patrol cooking sites need proper nonperishable-food storage, but no refrigeration.			●

Check temperature-chart posting. Safe temperature is 45 or less. Check patrol sites for proper storage. Check for evidence of rodents. Unit must be clean and all food properly covered.

*36. All dishes and cutlery are stored in a clean, flyproof, and rodent-proof enclosure. Cutlery is stored in containers with handles in one direction.	●		●

These cupboards or drawers are clean and free of flies and other insects. At patrol cooking sites storage should be in the patrol food box.

*37. Camp-kitchen and other food handlers, including food-issue personnel in patrol cooking camps, are neat, wear clean clothing, and comply with all state and local laws.			●

Occupational Safety and Health Act (OSHA) standards are known and maintained.

All kitchen personnel are neat, clean, and wear clean clothing. White clothing is preferred in camp kitchen. Long hair must be confined in hair nets. Personnel with cuts or sores on their hands or with colds or sickness should not be on duty unless the medical supervisor gives approval.

Where patrols are doing their own cooking, boys preparing and serving food should adhere to rules of cleanliness, be neat, clean, and wear a clean apron or towel covering waist. Staff members who issue food should appear clean and neat, and are considered food handlers.

*38. Kitchen, dining halls, commissary facilities, and patrol cooking areas are clean; fly control is satisfactory and meets local health standards.			●

Really are they clean? In buildings check corners, slicers, pots, pans, utensils, floors, cupboards, tables, sinks, windows, meat grinders, ventilators, ranges, and rafters for loose dust, dirt, and food particles.

*39. Food is served to patrols in an appetizing way and there is evidence of good table manners, including grace. (This is to be checked for all patrol cooking areas.)			●

Feeding boys in camp is a big, important business. Food helps to establish the morale of the camp. Review the menu and see steps in preparation. Are boys happy about the food served? Family-style feeding is our accepted practice because of the fine social values inherent in this plan. All of these items can be applied to feeding no matter where or how troops are served. Cafeteria food service is accepted practice if each troop eats together by patrols and observes grace before meals. Mealtime should not become a race with time.

RESPONSIBLE

Camp Committee	Scout Executive	Camp Director

Food preparation in summer camp happens at its best as part of the troop program. In this outdoor setting, supported by staff resources, every boy should learn the simple skills of outdoor cookery. Menu building, food ordering, and cooking place a premium on the teamwork of good patrol organization. This experience may come in several ways:

1. One-meal cookout
2. Patrol-issued food service at troop site
3. Trail trips—afoot or afloat
4. Outpost camping

Members of the program staff have the responsibility to supplement troop leadership when necessary to train and coach patrol cooks in the skills of camp cookery. Since this is a training camp, a minimum of three patrol-cooked meals per week is desired.

Boys should have the opportunity to learn how to build menus, determine food lists, and share in ordering food in correct amounts. When the camp program has been developed to a point that most of the patrols cook at least three meals, item 86 requirements are met.

*40. (a) Weekly menus (dining hall, troop, and patrol) are adequate to meet the needs of growing boys (balanced, quality, and quantity). (b) The menu used is posted. Mark "yes" if both (a) and (b) are true.	●	●	●

We recommend a 2-week-cycle menu to provide variety especially for those who camp longer than 1 week. This is especially important for camp staff members. Menus should be dietitian approved as to balance and serving sizes. Boys in camp burn up energy. They need more food than normal. Dining hall menus are posted for each meal. Patrol cooking requires issued menus and food lists plus cooking instructions provided to each patrol for all meals.

HEALTH

*41. State and BSA standards are effective in all swimming areas.	●	●	●

Natural waters are tested and safe for health of Scouts and meet local and state safety and health standards. Underwater obstacles are removed or clearly marked to prevent accident.
To be sure all state and local regulations are adhered to, water in a swimming pool needs daily testing.

*42. Emergency numbers are posted near phones for fire, police, rescue squad, hospital, camp physician, Scout executive's home and office.			●

These numbers should be posted at the camp phones or—if there is no phone—in the camp office, so that staff may have them readily available for emergency calls from the nearest telephone. Numbers should be clearly posted at all camp phones and large enough to read with limited lighting conditions.

*43. Sanitary fountains or paper cups are provided at each troop site and a sufficient number of centrally located drinking places.	●	●	●

Boys need water to drink. The camp must provide for a supply of cool or cold water. Drinking fountains must be of an approved design, factory-made especially for drinking only. The alternative is to provide paper cups at drinking places. Such places are to be located at all troop sites and in or near all central camp facilities such as activity areas, near administration buildings, waterfront, trading post, and health lodge.

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44. Facilities for showers are provided and readily available to campers. (Minimum of five shower heads per 100 boys.)	●	●	

These may be centralized facilities. A procedure should be established for their orderly use and maintenance. At least one shower per week is minimum. Water at the shower head must be comfortably warm.

45. Adequate toilet facilities are provided for visitors and campers in central areas.	●	●	

Visitors' toilet and hand-washing facilities for men and women are essential and should be provided near the picnic and/or parking area. These facilities must meet the standards in item 19. Sanitary facilities for campers near or in central camp program areas, including waterfront, will help maintain good health practices. In both types of facilities special attention to daily housekeeping is needed.

*46. Sufficient toilet facilities are provided (minimum of one seat for every 15 campers and one urinal at each troop site).	●	●	

Every troop site is to have toilets and urinals as noted. In each case, hand-washing facilities shall be adjacent to toilets. Cooks and staff should each have separate facilities. Check each point: Do seat covers close tightly? (They must be self-closing.) Is this facility flytight and cleaned daily? Is latrine box properly vented?

47. No DDT or pesticides prohibited by law are used in this camp.	●	●	

Responsibility rests on those camps where state laws do not govern pesticide use. In any case, the BSA recommends NOT using the following: DDT, Aldrin, 2,4,5-T, Dieldrin, Endrin, Heptachlor, Lindane, Toxaphene, Amitrol, arsenical compounds (inorganic), Axodrin, Bidrin, DDD (TDE), mercurial compounds, Strobane, Thallium Sulfate, and Parathion.

Use and storage of pesticides should be done strictly according to the instructions on the label.

Disposal of unused pesticides or containers should be made upon the recommendations on the label, from the supplier, or the extension service (county agent) in a manner that does not create a hazard to others and the environment.

For substitute recommendations of pesticides for insect or vegetation control, consult State Wildlife Department, Soil Conservation Service, or the Department of the Interior (Bureau of Sport Fisheries and Wildlife).

*48. Campgrounds are clean and neat and free from unnecessary hazards.			●

Is there evidence of daily "good housekeeping"? Trash barrels are available and used; storage areas are neat and clean; trails and roads are free of paper and trash; equipment is neatly stored; general appearance is good. Look behind, under, and off the beaten track.

SAFETY

*49. Fire extinguishers of approved type with a current inspection date so tagged are properly located and easily visible in buildings having fire hazards.	●	●	●

Extinguishers must meet OSHA standards. Check refill dates. These must be current. Fire extinguishers of the proper type are placed in locations prescribed by fire warden, local fire company, or insurance representative. There are week-

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ly fire drills under the leadership of a trained staff member. Central firefighting equipment is in good condition and ready for use including hoses, back pumps, rakes, shovels, mattocks, etc. All doors on buildings where people gather or are housed should open outward.

*50. All liquid fuels are safely stored, locked up, and under adult supervision (no exceptions). There is no storage of liquid fuels on troop sites. ● ●

The council health and safety committee establishes practices in line with national policy. All liquid fuels present a potential fire hazard. They shall be labeled and kept in locked storage, under control of one adult staff member. There are no flame-type lamps used in tents; kerosine lanterns may be used for latrine night lights. The storage building is separated from other structures, is clearly marked, and has locked doors. A responsible adult controls the distribution of all liquid fuels. The storage area is protected by a foam-type fire extinguisher.

51. Vehicles belonging to the staff, leaders, and visitors are parked in a central camp parking area. Roads in camp are restricted to service vehicles and these are operated in a safe manner. ●

No leaders' vehicles are on troop sites, parked at staff areas, or used to transport personnel.

CAMP STAFF

52. All staff members are at least 16 years of age or older. ● ●

Counselors-in-training (CIT) are not counted as staff members; however, the standards for CIT must be met for all who are not 16 years of age or more in order to qualify under item 52. Maturity in staff is essential. This normally comes with age and experience and that is the reason for the age requirement.

53. If counselor-in-training program is used, it is directed by an adult. Participants are 15 years or older. (If not used, mark "E" excused.) ● ●

Prestaff training through the counselor-in-training program provides opportunities for the 14- to 15-year-old young men to gain training and experience on the job. This item should not be checked "yes" unless there is adult leadership of the CIT and a written plan for training these young men. Inspector should see the written plan, and the council should send a copy of the plan to the Camping and Engineering Service.

54. All employees are employed with a written agreement, and copies of job descriptions for all camp staff positions are available for review and are part of the employment agreement. ● ●

A good camp staff manual will include job specifications. This information must be produced for review. If letters of employment specify responsibility, these may be accepted as a substitute.

*55. At least 3½ days of precamp training is provided for camp staff. ● ●

This training must include the improved Scout program including use of senior patrol leader council and its application to camp. Required for credit is a planned program of training covering the equivalent of 3½ days for all members of the staff. This should be conducted by the key staff men trained by the National Camping School. Ask to see the program and schedule. A training plan is provided by the Camping and Engineering Service.

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56. Resident chaplain service is provided by a qualified male at least 21 years of age _____ Catholic _____ Protestant _____ Jewish _____ other. Credit "yes" if at least one qualified resident chaplain is provided.		●	●

Resident chaplain service plays a vital role in the spiritual growth of both campers and staff members. Chaplain service may be arranged through religious advisory committees. Such service should be provided even though the camp may not operate on the Sabbath. Chaplains must be 21 years of age or more.

*57. Camp director is at least 21 years of age and preferably 25 years of age or older and holds current (within 5 years) National Camping School certification (management). Date certified _____. He has at least two sessions of prior administrative or supervisory experience in a Scout camp.	●	●	

The camp director must be at least 21 years of age, preferably 25 years, and hold a current (within 5 years) certification in Camp Management plus two years or more of previous experience in a supervisory or administrative position in a Scout camp. This is a higher standard than item 24 and is required for National Standard Camp Rating. Ask to see certificate. See exceptions for multiple camp reservations in item 24.

*58. The program director is 21 years of age or older and holds a current (within 5 years) National Camping School certificate in either Scoutcraft activities or program director's course. Date certified _____.		●	●

Participation and certification in a National Camping School within 5 years is a minimum requirement. The program director must be certified in the program director's or Scoutcraft activities courses. He must be at least 21 years of age. Ask to see certificate.

*59. Aquatics director is 21 years of age or older and holds current (within 5 years) aquatics certification from a National Camping School. Date certified _____.	●	●	●

Credit is given for the aquatics director who holds an unexpired BSA certification in waterfront administration. American Red Cross certification is not acceptable for this item.

*60. Qualified merit badge counselors are provided in camp for all merit badges applicable to camp.		●	●

Council camping and advancement committees, with the advice of the camp director, decide what are the outdoor merit badges to be approved in camp. The council provides qualified merit badge counselors for the outdoor merit badges. Council advancement committee should approve the list of merit badge counselors. Use of volunteer specialists is encouraged. They may serve on special days or at special times. Partial completions in camp are recognized and permitted. There is a list of merit badge counselors and instructors.

61. At least 50 percent of the program staff are 21 years of age or older, or the following staff positions are filled by qualified adults (as checked): _____ program director _____ ecology-conservation director _____ aquatics director _____ rifle range officer and _____ (number) camp commissioners (one for no more than four troops in camp). Program staff should about equal number of troops (chartered or provisional) in camp times 1¼.	●	●	●

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Plan A

The program staff includes these positions filled by qualified, mature staff, 21 years old or more.

Program director
Camp commissioners — One for no more than four troops
Sports director
Aquatics director
Ecology-conservation director (see item 62)
Rifle range officer

Example:

Troop sites	Staff needs
6	8
8	10
10	12
12	15
14	17

Plan B

Total program staff should be equivalent to number of troops (chartered or provisional) in camp multiplied by 1¼. Enough staff should be employed to serve needs during the camping periods of greatest population. At least 50 percent of this group should be 21 years of age or more. Do not include here young men serving as counselors-in-training.

Either plan is acceptable. In the case of a small camp, one man could hold two positions at the same time under Plan A.

62. The ecology-conservation director is 20 years of age or older and holds a current ecology-conservation certification from a National Camping School or has training in conducting an outdoor ecology-education program. ● ●

Alternate training includes college students or teachers who are trained in such fields as forestry, soil and water, fish and wildlife, earth science, ecology, environmental specialties, etc.

Credit may be given for students who have completed sophomore year as a major in one of above fields and have worked actively for one or more summers in a nature center or conservation-oriented staff position in a summer camp.

*63. The camp provides camp commissioner service (one for no more than four troops) to work with troop leaders. The camp commissioners have no other duties and are at least 21 years old. ● ● ●

These men are at least 21 years old and skilled in troop operation and camp program. They should be graduates of the National Camping School and have completed Cornerstone training. Camp commissioners have specific assignments to specific troops in camp with an established commissioner relationship understood by all. This is not an incidental part of the staff member's responsibility. He plays a primary role in helping the troop leadership conduct a successful and happy program in camp. If he is to be a success in this role, he must not have any other duty than that of being a camp commissioner to no more than four units. One exception—if qualified—he could also serve as a merit badge counselor.

If rotated volunteers are used, they have precamp training in the task of the camp commissioner. Training outlines are available from the Camping and Engineering Service.

64. The camp commissioner is provided with advance information about the troops he serves and submits a written report to the camp director when the troops check out. (Make reports available to inspectors.) ● ● ●

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Advance information includes qualifications of the leaders, their previous camp experience, condition of troop, patrol organization, number of Scouts, information on advancement, as well as the troop's plans for their week in camp. See suggested form in Summer Camp Program, No. 12002, page 29.

*65. The Scout uniform is worn by camp staff on duty (adjustments in uniform subject to duties). ●

Staff sets the pace. Correct uniforming by camp staff sets a tone for the camp and identifies it as a Scout camp. Uniform is the official summer uniform with knee-length stockings, shorts, roll-collar shirt or V-neck shirt with neckerchief. It should be worn while staff is on duty (exceptions at waterfront) and at meals. Applied "horse sense" would make exceptions to this for special tasks and extremes in weather, etc. Camp directors set the example. Uniforming should be made clear as part of the employment agreement.

TROOP LEADERSHIP

*66. All "camp troop Scoutmasters" are at least 21 years of age or older and are registered members of the Boy Scouts of America. ● ● ●

This standard is important and is not violated by the council when provisional leadership is provided. Assistants may be under 21 but are not to be under 18 years of age.
"All" means everyone, or standard is not achieved.

*67. At least two meetings are held with troop leaders and key members of the program staff. ●

Precamp training and program planning sessions based on the improved Scout program with troop leaders are most important to the success of troop program. Such sessions must be followed by at least two leaders' meetings. The first should occur soon after troops arrive in camp. Its purpose is to be sure that all leaders become familiar with services available, staff help, facilities, and to take the remaining essential steps in coordinating all program features of troops as well as camp-wide events. Subsequent meetings provide opportunities both to check progress and plans and provide fellowship. These meetings may be carried out under the leadership of the commissioner serving the troop. Refreshments are in order at all such sessions.

*68. Troop leaders (chartered and provisional) serve only in that capacity. ●

Troop leaders have a full-time responsibility with their own boys and should not be burdened with other duties. The camp staff has the responsibility of working with troop leadership to the end that every boy will have a purposeful and happy adventure in camping. A troop is not under its own leadership if it hires a man from outside the institution to go to camp with the unit—this is provisional leadership. Nor is it under its own leadership if it camps with another troop. A troop whose leadership changes every other day renders a poor program to boys; this type of leadership should be discouraged.

*69. A minimum of 3 to 4 hours of camp leadership training (including the improved Scout program) is provided for troop leaders before camp and by coaching during camp. ●

Training for troop leadership in the improved Scout program before and during

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the long-term camp is essential. To qualify for this item the council must provide formally, or through personal coaching, a complete training experience in leadership and program for long-term camping. Cornerstone training is required prior to camp. Precamp training may be done through one or more of the following methods:

Troop leadership training in camp over a weekend, involving the adult and key junior leaders of the troop.

Special in-town sessions, including time at roundtables

In-camp training, both formal (camp roundtables) and informal (commissioner service), is a must.

Personal coaching

70. Troops conduct one or more of their own troop leaders' council meetings per week with staff help as needed. ●

Boy involvement in program development before camp and its implementation in camp is essential evidence of good leadership. Camp staff should be available to support troop leadership in these meetings. Use the senior patrol leaders' council.

71. During supper and the evening, Scouts are encouraged to wear neat and clean uniforms. T-shirt with camp emblem, Scout shorts, and socks are acceptable for daytime wear. ●

Tone of camp is enhanced when Scouts are in neat and clean uniforms. Better uniforming will result when staff sets the example. While not a requirement for membership in the BSA, the uniform is an important part of the program. A regular uniform in camp will enhance the Scout program. (See item 65 for more detail.)

PROGRAM—Special emphasis in 1974—Apply improved Scout program

*72. Boy leaders are involved in planning troop camp program through the troop leaders' council using the camp program staff as consultants, and patrols carry out plans or projects in the troop program selected by or originated by them. ● ● ●

A good troop program is the product of the action taken by boys in patrols and by their patrol leaders' meetings with adult leaders to discuss and plan activities that reflect the desires and interests of boys. These planning meetings are important to the success of the troop program in camp. The camp staff has a major responsibility to be sure that every troop has an effective, well-balanced program.

This is primarily a commissioner's function.
A troop camp program is ideally initiated weeks before the troop arrives at camp. A camp leader's guide, containing ideas and procedures for the troop to follow in building its program, is evidence of helpful program service. The troop program should include a balance of activities that will meet the needs and desires of individual boys, patrols, and the troop. Camp program should be flexible and provide for personal relaxation of boys.

*73. An opening day exploration tour is held for all troops.

Summer Camp Program, No. 12002, carries a detailed agenda. Even experienced troops have new Scouts who need to be a part of this program. They meet staff and see new facilities. Credit "yes" when tours include:

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- Map of camp and its boundaries.
- Identification of natural hazards and "off limit" facilities that can endanger health or life.
- All program area resources.

74. Planned troop and patrol programs are posted on troop bulletin boards. ●

After patrol and troop programs are determined, it is important that all members of the troop be informed. Posting programs on troop bulletin boards is an evidence that there is a planned program.

*75. Teaching and practice of the skill awards and outdoor merit badge requirements are included in program experiences. ●

These program experiences will include opportunities for individuals to learn and earn the skill awards and merit badges. Awards are available in camp and immediate recognition made of achievements.

A part of these planned experiences includes opportunities for patrols to plan and carry out their own activities related to skills in camp. Look for evidence of these activities. Credit is given based on evidence observed in the course of the inspection.

76. Specific areas and facilities have been established for meditation and religious services. ● ●

The camp chapel or chapels should be located away from the busy activity areas of the camp, yet convenient enough to make them readily accessible. They are available for formal worship, rest, and meditation. Facilities should be simple in nature; seating should be simply designed. Lectern and altar are designed to meet the needs of the religious faiths and fit into the natural surroundings. In a Scout reservation these facilities may be shared by more than one camp.

77. At least one camp-wide program event planned by the senior patrol leaders' council (as checked) is provided to stimulate troop program: Check _____ aquatics events _____ intertroop campfires _____ intertroop (patrol) Scoutcraft competition _____ sports _____ other _____. ● ● ●

Camp-wide program events, planned and carried out by the senior patrol leaders' council, play an important role in the troop program. Colorful, purposeful special events actively encouraged by camp staff become program highlights for boys. Such events lend sparkle to the troop program when the selection of features is a part of the democratic action of the camp roundtable, troop leaders' council, and the senior patrol leaders' council. Balance in the number of such events is important. Secure evidence that these events take place by talking with leaders and boys.

78. The camp program includes attractive special program opportunities for 2d-, 3d-, and 4th-year campers. List them and credit "yes" if at least two are provided. ● ● ●

Attractive program opportunities for 2d-, 3d-, and 4th-year campers are vital to the success of camps. These experiences must be of an advanced nature, including such things as specialty camps, backpacking, canoe trips, advancement, sports, projects, etc. They should be offered for stayovers, leadership corps members, etc.

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79. Nine to ten hours are scheduled for sleeping.			●

Check camp daily time schedule. Adequate bed rest is essential to good health.

*80. Scoutcraft and campcraft training is made available by one or more of these methods: (a) in troop or patrol sites; (b) in several camp commissioner areas; (c) in central camp activities areas (including equipment, facilities, and staff support). ●

__Pathfinding (finding your way—including proper equipment for orienteering and star study)
__Campcraft (outdoor living)
__Pioneering and ropework
__Ecology-conservation—including simple weather station
__Cooking

These facilities and related equipment are intended to provide training and activity helps for troops in camp. Equipment may be used in one of these designated areas or it may be made available for use at troop sites, on the trail, at outpost camps, or in an appropriately located area in or near the troop campsite. In this way, capacity of an activity area need not be a limiting factor in helping troops and providing an effective program opportunity for boys. These activity areas may be duplicated in several decentralized locations in a camp. The commissioner area is ideal. Inspectors are asked to check these areas for boy use.

See if there is evidence of safety training in skills like pioneering, cooking, use of woods tools, etc.

Equipment, facilities, and layout for these areas are explained in the following:

Summer Camp Program, No. 12002

Scoutcraft Activities Charts:

Activities and Demonstrations on Troop Sites, No. 12007
Find Your Way — Tracking and Trailing, No. 12008
Woods Tools, No. 12009
Ropes, Knots, and Pioneering, No. 12010
Living in Camp — Campcraft, No. 12011
Things To Do in Nature and Conservation, No. 12012
Scout Camp Waterfront, No. 12021

*81. Camp program includes a posted list of conservation projects taken from conservation plan that can be done by an individual boy, patrol, or troop. The committee saw evidence of projects under way this season. ● ● ●

The advancement program includes conservation projects. The period at camp is a very opportune time to accomplish these requirements, at the same time doing a Good Turn for conservation and the camp. A list should be posted on troop bulletin boards. These should challenge boys to do meaningful projects with real learning experiences.

82. A well-labeled ecology-conservation trail is available. This may be along a suitable existing hiking trail. ●

This trail should be a learning experience. Ecology Signs, No. 7167, is available—includes instruction in trail layout; can be used with appropriate nature trail signs. Work the trail. Is it used? Credit "yes" when satisfied that it helps Scouts to learn more about their environment.

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*83. Outpost camps with special program features are available and used for overnight camping.	●	●	●

The council provides facilities, equipment, and staff for outpost camping. Special features could include fishing, canoeing, Indian lore, survival, etc. Visit at least one outpost camp, observe program, discuss with leaders.

In the controlled setting of a well-organized, equipped, and staffed long-term camp, there should be opportunities for troops to learn the skills of hiking and trail camping. Outpost camps carefully located to include the lure of special program features will enrich the adventure, fun, and personal fitness values of the long-term camp. They may be nearby or faraway. Safe water and sanitation should be available at the site. Permit to use off-council site outposts should be in writing. A 12-troop campsite should have four outpost camping areas.

84. Trail camping equipment is available as follows (per 100 boys): 10 to 20 trail-type tents _____, 4 to 8 patrol cook kits _____, 10 to 20 trail packs or pack frames or boards _____, 4 to 8 cooking flies (trail tarps) _____.	●	●	

Camp should be a learning experience. Equipment and trained staff are essential to success. We should prepare Scouts to do a better job in all year-round experiences. Credit "yes" when camp or troops themselves provide for this equipment and there is evidence that it is used under competent leadership from the staff.

*85. Instructions in trail, outpost, and patrol site cooking are provided for all troops.			●

See 84 above. If possible, observe this procedure and discuss its outcome with leaders. Credit only when there is real evidence of this activity.

*86. In the process of participating in special camp program experiences most patrols prepare and serve at least three meals per week in or away from their own sites.			●

Read statement under item 39. Credit only when there is evidence that the camp staff really promotes this program experience and has created a high degree of acceptance.

*87. The six Scoutcraft Activities charts are made available to all troops by assignment or through the camp commissioner.	●		●

See evidence that the six Scoutcraft Activities Charts, numbers 12007 through 12012, are in use in troop sites. They may be drawn from the camp commissioner. These Scoutcraft activities are naturally related to program at patrol and troop sites or in nearby areas. They are devices used by troop and camp leaders to assist in teaching boys Scouting skills and activities. They should be individually mounted and used at the location of the specific activity as needed. They are not permanently mounted on latrines and troop site bulletin boards. Ideally every troop should have and use these charts for instruction purposes.

*88. Woods tools (ax, bow saw, and sharpening equipment) are available in each troop site or commissioner area.	●	●	●

Look for evidence that the saw, ax, and knife are available and used properly, also that they are in good condition and safety training is included.

This equipment is essential to living in camp, and all Scouts should learn to use these tools properly and to recognize responsibility to use natural areas wisely.

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89. Aquatics specialists are provided for swimming, boating, canoeing, sailing, skin diving, motorboating, water skiing. (Check "yes" if 4 of 7 are provided.) (Excused when location of camp does not provide for these activities.)		●	●

A well-rounded aquatics program requires trained staff leadership. The camp staff should include members who are expert in these fields: swimming, boating, canoeing, and any other special fields for which the camp provides facilities and/or equipment such as sailing, water skiing, skin diving, motorboating, etc. These men should be trained through the National Camping School or an acceptable equivalent. Size of aquatics staff will be influenced by the size of the camp as well as program specialties available.

*90. Camp program services include adequately equipped swimming facilities. (In a few extreme cases swimming may not be practical. If true, check "no" and excuse.) Note conditions:	●	●	

Swimming area is fenced, has one entrance and exit, with buddy board and three swim areas. There should be one each for nonswimmers, beginners, and swimmers of proper depth with good water clarity and the bottom free of hazards such as stumps, rocks, potholes. Areas are clearly and properly marked in accord with standards in Aquatics Program, No. 12003. There should be a lookout tower, reach poles, and life rings properly stationed, and docks and floats that are solid and planking that is safe. The area is clean and looks sharp. Safety equipment, such as grappling irons and rescue gear, is available at the site. Area must be under properly qualified supervision.

*91. There are separate areas for nonswimmers, beginners, and swimmers, with visible markers defining each area.			●

Refer to 90.

92. The camp provides each troop the opportunity for an instructional and a recreational swim daily.			●

Instructional swims by troops in classified areas are an essential learning experience for every Scout and leader. The lives of boys are at stake. Supervised recreational swims are a part of the camp adventure and are in themselves learning experiences.

*93. Troop leaders are coached soon after arrival in camp and have at least one practice of Safe Swim Defense with their troops in camp.			●

This must not be an optional experience! The Safe Swim Defense plan involves these steps:

1. Medical examination
2. Trained supervision
3. Safe swimming area
4. Lifeguard
5. Lookout
6. Ability groups
7. Buddy plan
8. Good discipline

All troop leaders must be trained to carry out this plan and given at least one chance to practice it with their own troops under staff supervision.
The camp issues certification to adults who qualify by conducting safe troop swims.

94. Camp program services include an adequately equipped safe boating area with eight safe boats and eight safe canoes per 100 boys or seven troop sites.	●	●	

This item may be excused when water area does not provide for space, and thus limits the number of boats and canoes that can be used.

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*95. The swimming area has one entrance and exit and has at least one tower or elevated lookout station properly located for maximum visibility and manned during aquatics activities.	●	●	●

Positive control in the swimming areas is required. There should be no compromise in these requirements.

The general swimming area is defined by buoy markers. Float lines are used to enclose the nonswimmer and beginner areas. The lookout tower or vantage point must be located so the guard may see the entire swimming area without turning his head.

*96. Facilities, usable equipment, and qualified staff are available for field sports (check "yes" if three are provided): _____ target archery _____ shotgun _____ fishing or casting _____ orienteering _____ rifle marksmanship _____ action archery _____ hunter safety _____ other _____ .	●	●	

Reference: Field Sports, No. 12020. Use of three of these programs is required for a "yes." The three offered must provide equipment and trained staff support. Other programs not offered are noted as "no-E" and excused.
Items 97 through 104 relate to 96.

97. Rifle range provides five firing points per 100 boys or seven troops.	●	●	

Standards in item 23 must be operable.

98. The camp has a total of six single-shot operable .22 rifles per 100 boys or seven troops. Trigger pull not less than 3 pounds.	●	●	

(See item 23.)

99. There is a hunter safety field course which follows the suggested NRA plan.	●	●	●

The suggested hunter safety course is the same as that recommended by the NRA. Charts and information are not available in BSA materials. See NRA Hunter Safety Course material available from National Rifle Association of America, 1600 Rhode Island Avenue, N.W., Washington, D. C. 20036.

100. There is a ratio of two traps and four .22 operable shotguns available for a 10 to 14 troop camp.	●	●	

An alternate is to offer the newer 410-gauge shotgun program. Standards set by NRA must be in effect and the range officer is responsible to have NRA range specifications and operational guides available for inspectors.

*101. The archery program is conducted safely (to qualify, all items must be satisfied). _____ a. Archery areas are properly designed. _____ b. Equipment is safely stored (locked up when not in use). _____ c. Qualified supervision, 18 years of age or older, under adult guidance, is provided and minimum state requirements are satisfied.	●	●	●

All facilities and practices in archery meet the safe standards outlined in Field Sports. Bows and arrows are lethal weapons when improperly used. The camp must provide a locker or cabinet that can be securely locked. Only the approved

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instructor should have access to the key. This storage may be in a central program facility or at the range.

Qualified supervision is as important in archery as in riflery. This may be carried out by a competent young man, 18 to 21 years of age, under adult guidance provided by the program director or a member of his staff. Minimum state requirements must be satisfied if these standards do not cover same.
Check "yes" only when the camp meets all standards listed under this item.

102. There is a ratio of three targets, 10 bows, and 60 arrows per 100 boys or seven troops. ● ●

This is to assure that adequate equipment is available when the program is offered.

103. There is an action archery course with 10 to 14 stations equipped with 10 bows and 36 rubber blunt arrows for 100 boys or seven troops. ● ● ●

Standards for operation and supervision are in accord with Action Archery Chart, No. 12022.

104. There is a ratio of eight spinning or spin casting rods plus four fly rods and/or cane poles per 100 boys or seven troops. ● ●

Fly rods are not recommended unless there are competent instructors. Cane poles for panfish provide program experiences that are most practical for Scouts.

All fishing involving casting with hooks requires careful supervision with adequate instruction to prevent accidents. Fishing from boats, decks, and piers exposes Scouts to danger of water accidents and requires the same high standards of safety as any other aquatic activity. ● ●

Wading in streams and along shores must also be carefully supervised to prevent accidental drowning.

CAMP ADMINISTRATION

*105. A current development plan for this camp has been reviewed by the appraisal team. ● ●

Development plan.—This is a drawing, usually prepared by the Camping and Engineering Service, that shows all proposed development on the property. This plan is very carefully developed and should be adopted by the executive board in order that "whims of transient leadership" can be guided into sound planning and development.

The conservation plan is used in the preparation of the development plan and should be coordinated with it at regular intervals.

*106. There is an up-to-date map showing water lines, cesspools, grease traps, roads, trails, utility lines, and filter beds. ● ●

Review the camp's control map for the up-to-date locations of all items listed. This is a map of record and must be available.

*107. This camp carries out a planned, written maintenance program—a copy of which was reviewed by the appraisal team. ●

Maintenance of property, facilities, and equipment is an important budget item. Such costs are reduced with proper construction, purchase of quality equipment,

	RESPONSIBLE		
	Camp Committee	Scout Executive	Camp Director
and a carefully planned maintenance and replacement schedule. Is there evidence of this? Plans should be in writing. An example of evidence is the use of Camping and Engineering Service Maintenance Checklist or some similar plan, including documented job cards, etc. Appraisal team to review written maintenance program. Reference: Camp Maintenance Management, No. 3688.			
*108. There is a complete equipment inventory for all departments and an effective system of issuance and control.		●	●
Actually review these records. Do they show starting inventories and record status of items periodically during the season? Are staff members held accountable for the inventory through an accepted procedure of issuance and control? Copies of opening and closing inventories should be in safekeeping at the council office.			
*109. There is a strict and orderly method for handling trading post stock, cash, and inventory with supporting records.		●	●
Proper records include inventory, stock control records, and daily cash reports. There should be evidence that these records are properly maintained.			
*110. There is a weekly food cost-control record and a complete weekly inventory of commissary supplies.		●	●
A weekly food cost record is necessary to sound management. This record should be based upon a complete weekly food inventory. These reports should be reviewed by the Scout executive. This record is kept even though only staff is fed. A daily food cost accounting may be part of this system.			
*111. There is a camp operating budget and an effective cost-and-budget-control system.	●	●	●
A camp operating budget approved by the executive board is essential to good business management. A budget and cost control system is part of the operating practices of the camp. Evidence of budget control should be produced by the camp director.			
*112. There is a written conservation plan prepared by a Federal or state agency or equivalent and evidence that it is being carried out. The plan and evidence were reviewed by the appraisal team.	●	●	●
Refer to Managing the Council Outdoor Program, No. 12001. To determine if the council camp properties have a conservation plan, apply these seven questions. If all seven answers are "yes" then the council has met the requirements for item 112. Seven "yes" answers, and you have a plan.			
1. Plan written with the assistance of appropriate Federal or state agency or qualified professional conservationist from private business or organization.			
2. Plan includes basic soil capability map and interpretations of basic soils information for use of land for recreation, including intensive camping sites, roads, intensive-play areas, waste disposal, hiking trails, etc.			
3. Plan includes layout and program for rotating patrol sites according to recommendation of Camping and Engineering Service and soil conservationists.			
4. Plan includes vegetation management plan (grassland or forest).			
5. Plan includes wildlife management plan.			
6. Where applicable, plan includes fish management plan.			
7. Plan includes a 5- to 10-year schedule for accomplishment, with a year-by-year breakdown of projects with cost estimates.			

	RESPONSIBLE		
	Camp Committee	Scout Executive	Camp Director
*113. A systematic plan of camp promotion is in effect for next year. The camp director discusses the troop's plans for next year with each troop leader.	●	●	●
Camp director or program director meets with each Scoutmaster before he leaves for home to have him sign up for camp next year. The council has a year-round promotion plan with goals set for each district. Review this plan with camping chairman.			
114. The council provides a way for individual boys to camp on a provisional troop basis with qualified adult leadership provided.	●	●	●
Provisional camping is an accepted practice for providing for an extended camping experience for specialty camps. It makes possible a camping experience for Scouts who belong to troops that the council has failed to help recruit their own leadership for camp. Non-Scouts can also be given a good experience. Adult—21 years or older—camp Scoutmasters are required for credit.			
115. This council has a plan to provide camperships for Scouts unable to pay.	●	●	
Review the plan. Give credit when funds are available and allocated to needy Scouts in a manner that will not offend them or the family.			
116. This council has a plan to bring in needy non-Scouts and provide a camping experience for them.	●	●	
This plan should be reviewed and approved each year by the council executive board. Outreach Camping, No. 20-101, available from BSA is the best basic text for detailed information.			
117. A representative group of Scoutmasters and Scouts were interviewed to discuss Scouting attitudes and camp values.			
Report findings in attachment to this National Standard Camp Rating.			

BOY SCOUTS OF AMERICA — CAMPING AND ENGINEERING SERVICE

NATIONAL STANDARD CAMP RATING 1974 INFORMATION AND SCORESHEET

(Use this form to report and forward rating scores from the *Camp Inspection Worksheet*, No. 20-113)

Council _____ City and state _____ Region _____ Council No. _____

Scout executive _____ Camp director _____ Occupation _____

Camp name _____ No. of professionals on camp staff _____

Total acreage _____ usable acreage _____ acres of water _____ No. of troop campsites _____

Total boy capacity per period _____ total periods _____ No. of troops/Scouts in camp: 1973 _____ / _____

this week ____/ _____ expected this summer ____ / _____ Is this a multiple-camp reservation? _____

How many camps are used? _____ Is campsite: used year-round? _____

equipped for winter camping? _____ used for Scouter training? _____ used for Cub Scout day camp? _____

What feeding methods are used? _____ dining hall _____ patrol cooking _____ other (identify) _____

Is there a full-time resident ranger? _____ Are there suitable picnic and visitors' facilities? _____

Are storage facilities adequate? _____ Has this camp a satisfactory overnight group campsite? _____

RATINGS AND RECOGNITIONS 1974 (Circle Rating Earned)

"A" NATIONAL STANDARD CAMP FLAG

_____ Meets all Mandatory Standards (only exceptions are legitimately excused items)

_____ Meets all of the standards identified with an asterisk (*) in Part II

_____ Meets 85 percent of all standards in Part II (at least 77 of the 91 including the * items)

"B" NATIONAL INSPECTED CAMP CERTIFICATE

_____ Meets all Mandatory Standards (only exceptions are legitimately excused items)

_____ Meets 85 percent of the items in Part II

"C" LETTER OF INSPECTION

_____ Meets all Mandatory Standards (only exceptions are legitimately excused items)

_____ Meets less than 85 percent of the items in Part II

Region sends a letter to councils with "C" ratings identifying the areas needing correction. "C" is really an unsatisfactory rating. The camp is meeting the minimum standards. Every effort must be made to improve by next year.

Report by _____ Position _____ Date _____

Address _____ Phone _____

Visiting party included _____ (Number) regional representatives _____ (Number) local council personnel

Note for Inspectors: This is a scoresheet only. Use the *National Standards for Scout Camps of the Boy Scouts of America*, No. 20-111, as your reference.

PART 1 — MANDATORY STANDARDS *Failure to comply could be cause to close the camp.

Circle items that do not comply—Example: (5*)

1* 2* 3* 4* 5* 6* 7* 8* 9* 10* 11 12* 13* 14* 15* 16* 17* 18 19* 20* 21* 22* 23 24* 25 26

Comments and recommendations _____

PART 2 — FACILITIES AND OPERATING STANDARDS *Required for National Standard.

Circle items that do not qualify—Example: (5*)

Troop site: 27 28* 29* 30* 31 32 33* 34*

Food service: 35* 36* 37* 38* 39* 40*

Health: 41* 42* 43* 44 45 46* 47 48*

Safety: 49* 50* 51

Camp staff: . . . . . 52 53 54 55* 56 Catholic _____

Protestant _____ Jewish _____

Other _____ 57* 58* 59* 60*

61 62 63* 64 65*

Troop leadership: . . . 66* 67* 68* 69* 70 71

Program: 72* 73* 74 75* 76 77 78

79 80* 81* 82 83* 84 85* 86*

87* 88* 89 90* 91* 92 93*

94 95* 96* 97 98 99 100 101*

102 103 104

Administration: 105* 106* 107* 108* 109*

110* 111* 112* 113* 114

115 116 117

Excused items: Record number and reason _____

Attach any additional comments and recommendations on a separate sheet.

Copies as follows: White — Camping and Engineering Service; Canary — Region; Goldenrod — Area; Pink — Council

BOY SCOUTS OF AMERICA CAMPING AND ENGINEERING SERVICE

CAMP INSPECTION WORKSHEET

1974 National Standards for Scout Camps of the Boy Scouts of America

This field worksheet is to be used in conjunction with the inspection guide *National Standards for Scout Camps of the Boy Scouts of America*, No. 20-111, when inspecting a Scout camp. This field worksheet should be used to record the results of the inspection while the inspection is in progress. Once the inspection is over, the results on this scoresheet should be transferred to the *National Standard Camp Rating 1974 Information and Scoresheet*, No. 20-112, for the official report to the Camping and Engineering Service, Boy Scouts of America, North Brunswick, N.J. 08902.

Council _____ Camp name _____ Date _____

RATINGS AND RECOGNITIONS 1974 (Circle Rating Earned)

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61 62 63* 64 65*

Troop leadership: . . . 66* 67* 68* 69* 70 71

Program: 72* 73* 74 75* 76 77 78 79 80* 81* 82 83* 84 85* 86* 87* 88* 89 90* 91* 92 93* 94 95* 96* 97 98 99 100 101* 102 103 104

Administration: 105* 106* 107* 108* 109* 110* 111* 112* 113* 114 115 116 117

Excused items: Record number and reason _____

Attach any additional comments and recommendations on a separate sheet.