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| **NAME/ ORGANIZATION** | **REGULATION** | **REGULATORY CITATION** | **DESCRIPTION OF ISSUE OR CONCERN** | **SUGGESTED CHANGE** | **PRIORITY** |
| Health Division Boston Inspectional Services Dept | Recreational Camps (105  CMR 430.000) |  |  |  |  |
|  |  | 430.02 | Definitions 1. Aquatics Director 2. Camper  3. Certificate of immunization 4. Camper defined as a child under 18 | 1. Clarify certifications - watersafety professional but requirement is for a lifeguard only. 3. Removal of immunizations month, year, type etc.- how does one know what they received for vaccines? Are we accepting a form letter only stating they are up to date? 4. Many campers with special needs attend to age 22. Concerning that they are not identified as campers due to age nor record keeping required for them. |  |
|  |  |  | Definition: Recreational camp | Recommend statement for exempt programs unlicensed to inform applicants  not a licensed camp. Add definition of "drop - in" |  |
|  |  | 430.05 | License Required | Is this legal? A contridiction? To require a permit for a camp prior to operating and inspecting unless allowed per .650? |  |
|  |  | 430.09 | Background Information | Permanent staff If proper CAMP CORI  /juvenile record is completed ( recommend re-do every 3 - 5 yrs. ) |  |
|  |  | 430.091 | Staff Orientation | Orientations and training - verification of attendance by staff sign in and documentation of training provided. |  |
|  |  | 430.093 | Abuse and neglect | Add to injury reporting .154 as "incident" report to track since 51A private - Give copy to DCS AND LBOH |  |

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|  |  | 430.100 C | Counselor /Jr | Once special needs was stricken should insert **Medical specialty camps** - should require the 18 /16 yr old counselors / jrs for **Medical specialty camps, not 16 /15 yrs.** All counselors , per ACA / MCA etc.- have training which meets criteria for specific functions of acceptable performance etc. |  |
|  |  |  | Supervision of Specialized Activities | Update certifications required for staff- include archery, et al. Add high risk inflatables requiring permits as specialized activities with requirements - rock wall, survival , rope course etc. |  |
|  |  | 430.103 B | Swimming | 25 Campers per lifeguard. Recommend minimum 2 lifeguards for offsight as Aquatics Director not required. Reference to the law but should identify as Christian's Law; not just the MGL |  |
|  |  | 430.103 C | Watercraft | Update number of lifeguards required, staff certificates / agencies, address defining hazardous water, Christians Law, per certifying agency requirements |  |
|  |  | 430.151 A2 & 3(B) | Physical Exams | A2 -Physical in 12 - 18 months - schools require annually |  |
|  |  | 430.154 | Injury reports | HIPPA where required. Add "incidents" of abuse / neglect |  |

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|  |  | 430.159 B &C | Health Care Staff | B. Notify both parent and guardian - states or guardian in other sections. Health Supervisors sufficient in number for close proximity (line of sight) to provide immediate first aid (esp. with off site campers). Post Certs. And add CPR /AED training only stated in the definitionof first aid training but should carry over |  |
|  |  | 430.160 (B) | Storage of Meds. | D(2) c Diabetics- Would like clarity on the child that comes with the pump but unable to self inject / monitor - Can the Healthcare Supervisors assist? To what degree? |  |
|  |  | 430.161 (C ) | First Aid Supplies | Updated supplies per first aid trg requirements - minimum list Z801 A or B? Is EPI pen included for those trained? |  |
|  |  | 430.190 (B) | General Program Requirements | B -Either set standards for LBOH (walkers - age of child, familiarity of route, signed procedures, verify reached camp / destination or make it Director & parent responsibility with sign off. C- Combine all info to parents in sec. .159. and clarify background procedures versus checks |  |
|  |  | 430.191 | Requirements | Often bare minimum. Reference effective child guidance policies etc. for more robust, current practices / policies |  |
|  |  | 430.204 | Waterfront and Boating |  |  |
|  |  | 430.209 | Telephones | Land line too? All cell OK? |  |
|  |  | 430.210. | Plans for Natural & Emergencies | Need bather swim test, buddy system for pools also. |  |

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|  |  | 430.217 | Tents | At odds with fire retardant per Fire Inspectors CPAI - 84 and NFPA 701 accepted by DCS for tent tags |  |
|  |  | 430.251 I | Transportation Safety | Is the intent for only one hour of transport under age 7 now extended to other travel versus camp to home?? |  |
|  |  | 430.373 & 374 | Handwashing Facilities / Bathing | Equipped with soap and min. warm water temp for hand sink and shower, hand drying equipment for sink |  |
|  |  | 430.631 | Application for a License | Would not remove the requirement for plans for review - where required by LBOH. Statement was very critical in our requirement for plans on new construction / renovations / site re-locations used as camps for children. |  |