

MIDDLE TENNESSEE STATE UNIVERSITY

**Summer Camp Safety: Risk Management Tools and Tips, 2021-2022**

By: MTSU Office of Compliance and Enterprise Risk Management

## Table of Contents

	Page
<b>Section One: Summer Camp Risk Management Documentation</b>	
1.01 Introduction.....	3
1.02 Summer Camp Risk Management Checklist.....	4-5
1.03 Waivers, Permissions, and Agreements for Participation.....	6
1.04 Medications.....	6-7
1.05 Incident Reporting.....	10
1.06 MTSU Informational and Emergency Response Resources.....	11
<b>Section Two: Camp Risk Management Planning</b>	
2.01 Emergency Response.....	12
2.02 Total and Partial Lock Downs.....	12
2.03 Inappropriate Adult-to-Camper or Camper-to-Camper Contact.....	13
<b>Section Three: Camp Program Administration</b>	
3.01 Parent Notifications.....	14
3.02 Visitors.....	14
3.03 Emergency Drills.....	15
3.04 Records Retention.....	16
3.05 Pool Safety, Disability Access, and COVID-19.....	17

## **Section One: Summer Camp Risk Management Documentation**

### **1.01 Introduction**

Camp safety is an important part of Middle Tennessee State University's (MTSU or University) enterprise-wide emergency management planning. While minors are often on campus for academic reasons as part of dual enrollment programming, minors participating in camp activities in University facilities and student housing present a separate set of risks.

The inclusion of camp crisis and emergency response procedures within the overall campus-wide crisis planning helps to ensure the safety and positive educational experience of camp participants and their families. Such planning also assists in mitigating the risks associated with hosting camps for minors on campus, whether camps are University sponsored, independently operated, or sponsored privately by the University's Athletics coaches or other private organizations. Establishing a set of baseline procedures, processes, and expectations for camp sponsors who utilize the University's facilities and campus buildings, beyond the sponsor's contractual obligations to MTSU, provides greater documentation of, and accountability for, safety procedures and crisis preparedness for the well-being of camp minors.

This Camp Crisis and Risk Management Plan (the Plan) provides examples of camp crisis and risk mitigation, program administration, and risk response. Section One of the Plan contains information regarding camp crisis documentation, a camp crisis and risk management checklist, and other resources for camp crisis responses. Section Two of the Plan discusses camp crisis and risk management planning in emergency situations. Section Three of the Plan provides procedures on general program administration resources that all MTSU sponsored and/or external sponsored camps should include in their camp's documentation, as well as information regarding pool safety, disability access, and COVID-19 protocols. Finally, Section Four (the Appendix) provides five (5) sample camp risk management planning documents, including an emergency response worksheet and a staff and volunteer screening worksheet.

## **1.02 Summer Camp Risk Management Checklist**

Utilization of a Summer Camp Risk Management Checklist is among the first steps in assessing key risk areas of the camp. While the use of checklists cannot eliminate camp risk, it can provide a baseline for beginning programmatic and safety preparedness and improvements, particularly in light of the COVID-19 pandemic.

The following page provides a list of questions for consideration in assessing camp risks.

## Summer Camp Risk Management Checklist

Checklist Questions	Yes	No; Needs Attention
1. Are safety responsibilities assigned?		
2. Do you have emergency response procedures, including notification to parents and external health and safety agencies in the event of active threats or natural disasters?		
3. Do you regularly review and check the camp's insurance coverage limits for compliance with contractual and regulatory obligations?		
4. Are your camp accident rates low or improving?		
5. Does the camp have a safety coordinator?		
6. Does camp management or staff conduct safety inspections of camp equipment, program rooms, pools, and/or play areas?		
7. Is there a policy on camp guests and visitors that is known to parents and staff?		
8. Does the camp maintain screening and background check records for camp staff, volunteers, and management?		
9. Is there a procedure for investigating incidents?		
10. Does the camp have a training guide for staff and volunteers?		
11. Is there a protocol for notification of camp changes to parents and guardians?		
12. Is training conducted on accident prevention?		
13. Are emergency drills conducted involving staff, volunteers, and campers?		
14. Is there an easily accessible contact list in case of emergencies?		
15. Are personal medications, food allergies, and other health needs of the campers documented?		
16. Are any camp staff members trained on suicide awareness and the procedures for handling youth suicide, youth self-mutilation, and mental health or behavioral warning signs?		
17. Is there a documented procedure for handling missing or abducted campers?		
18. Are first-aid kits fully stocked, easily accessible, and adequate for the number of campers?		
19. Are staff certifications (e.g. CPR, Swim Instructor, etc.) current and annually audited?		
20. Are there procedures for handling camp exposure to communicable diseases and blood borne pathogens?		
21. Is there an emergency communications procedure?		
22. Does the camp have adequate monitoring for camp security?		
23. Does the camp have procedures for evacuation and "shelter-in-place" locations during an emergency or active event?		

### **1.03 Waivers, Permissions, and Agreements for Participation**

MTSU sponsored and external sponsored camps should ensure participants have adequate documentation in advance of camp participation. The camp should have a record of the waivers, releases, permissions, and agreements for participation regarding each camper that is signed by a parent or guardian that includes: the use of University equipment (if applicable); acceptance of camp supervision; health and safety emergency procedures; acceptance of risk; and acceptance of responsibility.

The following are questions for camp sponsors and directors to ask as part of their Summer camp risk management assessment:

1. What permissions have, or have not been, provided in the agreement for participation?
2. In what areas or instances has the camp assumed responsibility?
3. In what location are the waivers, releases, permissions, and agreements for participation kept at the camp? Who has copies of the aforementioned forms, and who has access to the forms?
4. Do the permissions include:
  - a. Photo releases?
  - b. Medical information?
  - c. Release of the camper to persons other than the legal parent or guardian?
  - d. Use of written materials or art work written or developed by the camper?
5. Does the agreement for participation between the camp and camper include who is responsible for any emergency or unusual event involving a medical emergency, transportation issue, COVID-19 illness, or medical expenses?

### **1.04 Medications**

There may be circumstances where campers require medication or may arrive at the camp with medication needed for daily use or in the case of an emergency. Camp sponsors and staffers should keep a record of those camp participants who must take regular medication or those who require medication in an emergency situation.

The following is an example of a medication log that can be utilized by camp staff or sponsors:

## Medication Log

Camp Participants who take daily Medications:	<b>Camper Name</b>	<b>Medication</b>	
Emergency medication administered to:	<b>Camper Name</b>	<b>Medication</b>	<b>Nature of Emergency</b>
1. Person(s) responsible for dispensing emergency medications:			
2. Locked location where medications are kept:			
3. Person(s) with key access to locked location of medications:			
4. Do medications require refrigeration?	___ Yes    ___ No	<b>List refrigerated medications</b>	
5. Person responsible for checking that medications are prescribed to the person receiving the medication:			

### 1.05 Incident Reporting

Camp sponsors should maintain documentation of incidents that occur; however, incidents that occur on MTSU property or facilities, or that occur while utilizing any of MTSU's equipment, must be documented with a copy of the documentation to the appropriate resources listed in Section 1.06 of this Plan.

At a minimum, camp sponsors and their staff should have a plan for handling incidents for which external agencies must become involved to ensure the safety and well-being of camp participants. The following are some of the questions camp sponsors and staff should be able to answer related to incident reporting:





Name/Addresses of Witnesses (You may wish to attach signed statements.)

- 1. \_\_\_\_\_
- 2. \_\_\_\_\_
- 3. \_\_\_\_\_

Type of Incident:  Behavioral  Accident  Epidemic Illness  Other  
(describe)

Date of Incident/Accident: \_\_\_\_\_ Hour \_\_\_\_\_  a.m.  p.m.  
Day of Week; Month/Day/Year

Describe the sequence of activity in detail including what the (injured) person was doing at the time:

---

---

---

---

Where did the incident occur? (*Specify location, including location of injured and witnesses. Use diagram to locate persons/objects*).

Was injured participating in an activity at time of injury?  Yes  No If so, what activity?

Any equipment involved in accident?  Yes  No If so, what kind?

---

What could the injured have have done to prevent injury?

---

Emergency procedures followed at time of incident/accident

---

---

---

By whom?

---

Submitted by \_\_\_\_\_ Position \_\_\_\_\_

Date \_\_\_\_\_ Phone number \_\_\_\_\_

Copyright 1983 by American Camping Association, Inc. Revised 1990, 1992, 1999.  
Printed with permission of and under licence of American Camping Association, Inc.

## 1.06 MTSU Informational and Emergency Response Resources

All camps utilizing MTSU property, equipment, or facilities should be aware of the following University offices that must be contacted during emergency situations, including missing campers, illnesses, or other reportable incidences.

- a. **Office of University Counsel**  
Cope Administration Building, Suite 209  
Office: (615) 898-2025  
Email: [sherry.preston@mtsu.edu](mailto:sherry.preston@mtsu.edu)  
Information materials: <https://www.mtsu.edu/ouc/info-materials.php>  
Useful Links (including an event participation agreement with COVID-19 provisions): <https://www.mtsu.edu/ouc/links.php>
  
- b. **University Police**  
Office/Emergency Contact: (615) 898-2424  
*For off-campus emergencies, please dial 911, and you will be directed to the Murfreesboro Police Department*
  
- c. **Office of Compliance and Enterprise Risk Management**  
Sam Ingram Building, Suite 101  
Compliance and ERM Hotline Voicemail: (615) 898-5772  
Email: [caerm@mtsu.edu](mailto:caerm@mtsu.edu)  
Camp Safety and Risk Management materials: <https://www.mtsu.edu/caerm/summercamps.php>  
Insurance resource materials: [https://www.mtsu.edu/caerm/insurance\\_certificate.php](https://www.mtsu.edu/caerm/insurance_certificate.php)
  
- d. **Office of Institutional Equity and Compliance**  
Cope Administration Building, Suite 116  
Office: (615) 898-2185  
Email: [iec@mtsu.edu](mailto:iec@mtsu.edu)
  
- e. **Facilities Services and EHS**  
Office: (615) 898-2414  
EHS: (615) 898-2392
  
- f. **For Immediate danger involving a minor:**  
Contact University Police followed by the Tennessee Child Abuse Hotline at 1-877-237-0004. **For a Past Event (but not current threat):**  
Contact the Department of Children's Services at <https://apps.tn.gov/carat/>.  
Contact MTSU's Office of University Counsel for more information on the State's mandatory reporting procedures.

## Section Two: Camp Risk Management Planning

### 2.01 Emergency Response Planning

All camps utilizing MTSU facilities should have documentation of how the camp will respond in emergency situations. Camps should also have a list of emergency numbers that includes Poison Control, Fire Service, Animal Control, MTSU Resource Contacts (see Section 1.06), camp staff mobile numbers, and local EMS and Police numbers. In addition, camps should be aware of the State phone number for reporting child abuse (including emotional, mental, physical, or sexual abuse).

### 2.02 Total and Partial Lock Down

Camp directors and staff should have procedures for total and partial lock down scenarios in the event of an emergency. A total lock down of the camp or camp area is appropriate during imminent, threatening situations and involves local and state emergency response agencies, including, but not limited to, MTSU's Police Department. During a total lock down, camp activities are halted. During a partial lock down scenario, camp programming continues; however, no one is allowed to enter or leave the camp area.

The following are examples of plans for camp total and partial lock down procedures:

#### Total Lock Down

- Contact the MTSU Police Department at 615-898-2424 on campus, or 911 off campus for further instructions.
- Inform key camp staff of the threatening situation.
- Divert and direct all campers to the designated “shelter-in-place” location.
- As much as possible, maintain a calm atmosphere.
- Ensure all staff have a means of communicating.
- Ensure no one leaves or enters the camp area until the emergency has past and the camp official or emergency response agency has given the “all clear.”
- Account for all campers and staff.
- Lock all main doors once everyone is accounted for.
- If possible, gather original camp registration files and camp rosters.
- After an “all clear” has been provided, implement the camp’s media plan.
- Contact the applicable MTSU resources provided in Section 1.06 to inform them of the situation.
- Contact parents/guardians.

Total lock downs of the camp area also should occur during the following conditions:

1. Severe weather conditions
2. Fire
3. Bomb threat
4. Explosion
5. Serious accident
6. Death
7. Hostage situation
8. Unauthorized intruder
9. Missing camper
10. Armed and dangerous individual
11. Abducted camper

### Partial Lock Down

- The same procedures should be followed as noted above in the Total Lock Down scenario, except that camp activities and programming can continue as normal depending on the threat level.

Situations for which a partial lock down is required includes:

1. Discovery of a hazardous or suspicious substance
2. Severe weather conditions
3. Facility or severe utility malfunction

## **2.03 Inappropriate Adult-to-Camper or Camper-to-Camper Contact**

**Background checks.** Camps utilizing MTSU property, equipment, and facilities are expected to have policies and procedures for reporting assault or abuse of camp participants, which includes procedures and requirements for handling inappropriate adult-to-camper contact, or inappropriate camper-to-camper contact. All camps are expected to have documentation of criminal background checks on any adult participating in the camp, whether serving as a volunteer or staff member.

**Reporting and Supervision.** For MTSU sponsored camps or camps sponsored independently/privately by MTSU Athletics Coaches or other private organizations, the reporting procedures outlined in University Policy 101, Minors on Campus, should be followed. In addition, the Minors on Campus Policy provides requirements and responsibilities for program sponsors and directors related to the supervision and care of minors.

For additional information regarding Policy 101 or the mandatory State reporting requirements for sexual misconduct involving minors, please contact the MTSU Office of University Counsel (OUC) (see Section 1.06 for OUC's contact information).

## **Section Three: Camp Program Administration**

### **3.01 Parent Notifications**

Parents and guardians should be notified of changes to previously communicated plans as early as possible, including changes in location of camp activities; injury to a camp participant; or changes in the camp environment or facility that affects the health, safety, security, or enjoyment of the camp participants. At a minimum, all camps utilizing MTSU's property, equipment, or facilities, should have procedures for notifying parents of the following changes:

- An emergency related to inappropriate conduct of adult staff, volunteers, or other camp participants.
- COVID-19 symptoms and/or illness.
- A natural disaster (severe storm, tornado)
- An emergency related to a contagious illness outbreak.
- Pick-up or drop-off times.
- Camp location.
- Activity location.
- An emergency related to the MTSU facility, utilities, or safety of equipment.

It is expected that all camp sponsors and staff maintain a record and list of emergency phone numbers for camp participants.

### **3.02 Visitors**

The safety of camp participants is crucial to the success and enjoyment of the camp experience. All camps utilizing MTSU property, equipment, and facilities must have policies and procedures that provide camp safety regarding visitors. A visitor is anyone who:

1. Is not on the list of persons authorized to pick-up, drop-off, or visit the minor.
2. Is not a prescreened camp staff member, volunteer, or camp manager.
3. Is local, state, or government official.
4. Has the authority to repair or inspect MTSU facilities including, but not limited to: health inspectors; University contracted carpenters, plumbers, engineers, construction workers, or repairpersons.
5. Is a media representative.

6. Is a friend or non-immediate relative of the camp participant, such as a cousin, aunt, uncle, or grandparent.

The camp's policy or procedure also should outline the conditions under which visitors are allowed on site. Best practice dictates notification of the camper's parent or guardian whenever a visitor is on-site. Whenever possible, prior notification of visitors should be provided to the camp sponsor, director, and staff.

### **3.03 Emergency Drills**

The University regularly conducts emergency drills as part of its Emergency Operations Plan. Camp sponsors are expected to assess the types of emergency drills required for their particular camp to prevent panic by camp participants and to ensure the safety of campers.

Questions to consider regarding the need for emergency drills in camp settings including the following:

- Is the drill appropriate for the camp (applies to overnight camping and extended months/weeks of camps rather than one-day camps)?
- Who will initiate the drill?
- How are camp participants and staff made aware of the procedures for:
  1. Fire?
  2. Tornado?
  3. Evacuation?
  4. Intruders?
  5. An active Shooter?
- Who, at the camp, is responsible for camp participants?
- How often will the drills be conducted?
- Who will time how fast the camp participants and staff complete the drill?
- How is documentation of completed drills maintained?
- Will external agencies be involved in the drills?

### 3.04 Records Retention

While each camp may maintain their own records retention procedures, the following is a Records Retention Worksheet and Chart to assist camp sponsors with analyzing and maintaining camp records for risk management, insurance, legal, healthcare, and emergency purposes.

Camp Records Retention Worksheet and Plan				
Record Type	Storage Location	Names of Individuals with Access to the Record	Number of Years the Record is Kept	Date of Record Destruction (and Method of Destruction)

Camp records include, but are not limited, the following:

- Medication logs for camp participants
- Incident reports (all incidents including COVID-19 illnesses)
- **Camp Staff, student-worker, student-athlete, and volunteer background check screenings**
- Medical or health histories of camp participants
- Staff list and positions
- Participation Agreements, waivers, and releases
- Permission slips
- Photo/video Release Agreements
- Insurance records
- Accreditation documentation (if applicable)
- Visitor Logs
- Staff applications (with qualifications and certification information)
- Marketing information
- Camp policies, procedures, or manuals
- Program activity logs or operational plans
- Health screening records (camp participants and staff, where applicable)
- Complaint records
- Emergency management and/or safety plans
- Emergency drill logs (if applicable)



### 3.05 Pool Safety, Disability Access, and COVID-19

As part of its operations, all camps are expected to be aware of applicable local, state, and federal laws concerning the participation of minors in activities. The following are some of the application laws by subject matter.

**Pool Safety.** Virginia Graeme Baker Pool & Spa Safety Act of 2007, as amended (15 U.S.C. §§ 8001 - 8008) requires adult supervision of all aquatic venues to prevent unintentional drowning of children. This Act also requires pool or spa drain covers to conform to the entrapment protections standards of the American National Standards Institute and the American Society of Mechanical Engineers (ASME/ANSI). In addition, public pools are required to have the following equipment:

- Safety vacuum release system (ASME/ANSI standard A112.19.17)
- Suction limiting vent system
- Gravity drainage system
- Automatic pump shut-off system
- Drain disablement
- Doors with direct access to the swimming pool that is equipped with an audible alert device or alarm.
- Pool alarm
- Pool cover
- Pool gate equipped with a self-closing, self-latching device
- Ultraviolet light exposure tests (ANSI-16-2011)

**Disability Access.** Americans with Disabilities Act of 1990 (ADA), (42 U.S.C. §§12101 – 12213), requires accessibility to pools and buildings regarding the means of entry and exit. The ADA also provides provisions for service animals. Camp sponsors should be aware of any special needs involving disabled camp participants or campers requiring disability access to ensure reasonable accommodations, as well as ease of access to and from the camp area and activities.

**COVID-19.** The federal CDC, as well as the state health department has provided guidelines for the safe operation of camps. The guidelines include isolation and testing protocols of campers exhibiting COVID-19 symptoms, as well as other protocols to ensure the safe operation of camps and the reduction of viral spread. For additional information regarding the State of Tennessee's COVID-19 guidance and protocols, please contact the administration of MTSU Student Health Services.

## REFERENCES

1. MTSU Office of University Counsel, Minors on Campus Presentation (2021).
2. American Camp Association, <https://www.acacamps.org>.
3. Tennessee Department of Health, Bureau of Health Services Administration, Division of General Environmental Health, *Organized Camps* § 1200-1-5-01 through 1200-1-5-20.
4. Rose, Jen. SportRisk, *It's Not All Fun & Games: Risk Management for Summer Day Camps* (Mar. 22, 2012).
5. Virginia Graeme Baker Pool & Spa Safety Act of 2007, as amended, 15 U.S.C. 8001 – 8008 (amended Dec. 2014).
6. United States Department of Justice, Civil Rights Division, ADA Requirements -*Accessible Pools Means of Entry and Exit* (May 24, 2012); American with Disabilities Act, Title II, Subpart D, Program Accessibility § 35.150.
7. University of California, Marianne Bird and Jim Brenner, Agriculture & Natural Resources, 4-H Youth Development Program, *Camp Risk Assessment Workbook* (May 2006).