



MARYLAND Department of Health

Larry Hogan, Governor · Boyd Rutherford, Lt. Governor · Dennis Schrader, Secretary

INTERPRETIVE MEMORANDUM

DATE: April 17, 2017

TO: Maryland Youth Camp Operators, Center for Healthy Homes and Community Services
Staff and Summer Inspectors

FROM: Joseph T. McKenzie, III, LEHS, REHS/RS, MPH, Chief
Center for Healthy Homes and Community Services

RE: COMAR 10.16.06.47F(8), Water Safety Rescuer

This memo summarizes the Department's review of our findings regarding materials provided from both the US Sailing Association and the American Canoeing Association on training for watercraft camp personnel and water rescue around the potential equivalence of this training to meet the training requirements specified in COMAR 10.16.06.47F(8): "[One] lifeguard or water safety rescuer who has lifeguard or rescuer certification appropriate for the watercraft site". After the review, we agree that the training content and materials do address the necessary safety issues. Therefore, the Department agrees that staff members who have successfully completed the following curriculum would meet the criteria in COMAR 10.16.06.47F(8):

1. US Sailing – Small Boat Level 1 Instructor
2. American Canoeing Association – Level 3: River Canoeing Instructor
3. American Canoeing Association – Level 3: River Kayaking Instructor

Camps who can demonstrate that their staff members have successfully completed the appropriate training for the watercraft activity will be considered to be in compliance with this provision of the youth camps regulations, so long as they meet the following requirements:

1. At the time of inspection the camp provides appropriate documentation of successful completion of the appropriate training for the watercraft activity for each staff member who falls under the provision;
2. The number of staff so trained and designated is at least as great as the number specified in COMAR;
3. The camp is using the most current version of the applicable training curriculum; and
4. If the curriculum changes, US Sailing or the American Canoeing Association (or another entity representing watercraft camps) notifies the Department to permit a review of the modified curriculum.

This finding does not address other curricula or training materials that may be in use by other camps participating in watercraft activities. The Department reserves the right to review this decision in the future, based on changes in regulation, training materials, and the course content, or other circumstances.