



Swimming Facility Guidance-COVID-19 Safety Procedures

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As aquatic facilities prepare for a (hopefully) less restrictive summer season than in 2020, many questions are arising as to how best to interpret the sometimes-vague guidance of IDPH and the CDC. IRMA member aquatic facilities vary greatly, from bather loads to quantity of pools, to number of staff needed, and general facility layout. Therefore, it is imperative that facility operators use the guidance provided to develop its own internal set of procedures for a safe and healthy summer season. Below are just a few topic areas that are particularly difficult to interpret with some best practice risk management considerations to contemplate.

Note: This list does not include all components of the IDPH and CDC guidance and should not be used to replace such guidance. It is important that facility operators closely review that guidance when developing its own procedures. IRMA strongly encourages members to work with their local health departments when developing safe operating procedures.

Capacity/Group Sizes

IDPH: *“During Phase 4, swimming facilities licensed by IDPH can open to a maximum 50 percent capacity...Operators should limit group sizes to no more than 50 people, allowing for social distancing where possible. However, multiple groups of up to 50 people may be permitted if facilities allow for social distancing of guests and employees; 30 feet of distancing is maintained between groups; and areas for each group are clearly marked to discourage interaction between groups.”*

CDC: *“There is no standard formula to determine how many people can maintain social distancing in and around the water.”*

IRMA Guidance: The above guidelines provide the facility operator with a choice between limiting overall capacity to 50 people or allowing more than 50 people **only if** 1) the number is below 50% total capacity, and 2) groups of 50 can be spaced out 30 ft apart. Recommending that areas for each group be “clearly marked” leaves room for interpretation and implementation to the operator and what is feasible for their facility. In addition to marking areas as best you can, posting signage to clearly communicate your restrictions is also a great tool. To help control capacity, some members are choosing to forgo season passes and sell daily admissions using a reservation system. This system establishes time blocks throughout the day for a limited amount of people to enter.

Staff & Patron Screening

IDPH: *“Operators should make employee and customer temperature checks required upon entry to the facility, and at mid-shift screen employees to ensure the absence of COVID-19 symptoms.”*

CDC: “Conduct daily health checks or ask staff and patrons to conduct self-checks (such as temperature checks or symptom screening), if possible. Do health checks safely and respectfully and in accordance with any applicable local, state, territorial, federal, and tribal privacy and confidentiality laws, rules, and regulations. Operators may use CDC examples of screening methods.”

IRMA Guidance: Members should follow IDPH guidance so long as the temperature screenings can be conducted safely without additional exposure to employees and implemented consistently to avoid potential discrimination claims. If these parameters cannot be met, operators should determine the best symptom screening process for its own facility, which may include self-reporting of symptoms or an automated temperature screening device. Regardless of screening method, facilities should post COVID-19 symptoms on entryway signage along with a request that anyone exhibiting symptoms do not enter.

Social Distancing

IDPH: “Operators should limit group sizes to no more than 50 people, allowing for social distancing where possible... When features exist that cause patrons to congregate, including but not limited to, water slides and lazy rivers, additional controls must be implemented to prevent the spread of disease. Written plans addressing such features shall be available for inspection by IDPH staff or any other duly authorized government agent. Such plans shall minimally include controls for maintaining social distancing while patrons wait for and use the feature(s), including using attendants to monitor patrons waiting at features; utilizing markings, signage, and verbal advisories to maintain 6-foot social distancing before, during, and after using the feature; and providing sanitized rafts, tubes, or other equipment.”

CDC: “Encourage social distancing—staff and patrons should stay at least 6 feet away from people they don’t live with. This includes not gathering at the ends of swim lanes, behind starting blocks, or on stairs into the water or up to the diving board. There is no standard formula to determine how many people can maintain social distancing in and around the water.”

- “Stagger use of shared spaces.”
- “Stagger start and end times of swim lessons and aquatics classes.”
- “Assign separate entries and exits to encourage everyone to move in one direction, if possible.”
- “Limit occupancy of enclosed spaces.”
- “Discourage activities, such as eating and drinking (on dry land), that require removal of cloth masks unless at least 6 feet away from people they don’t live with.”
- “Educate staff and patrons about arriving “swim” ready (for example, showering before going to the aquatic facility).”
- “Ask parents or caregivers to consider if their children can stay at least 6 feet apart from people they don’t live with before taking them to a public treated aquatic venue.”
- “Limit any nonessential visitors, volunteers, and activities involving external groups or organizations.”
- “Provide physical cues or guides (such as lane lines in the water and tables or chairs on the deck) and visual cues (such as posted signs or decals or tape on floors or sidewalks) to encourage everyone to stay at least 6 feet away (both in and out of the water) from people they don’t live with.”
- “Stagger or rotate shifts to limit the number of staff present at the same time, but be sure to meet health and safety standards.”

Exceptions: *“Exceptions to social distancing should be made to:*

- *Rescue a distressed swimmer, perform cardiopulmonary resuscitation (CPR), or provide first aid; or*
- *Evacuate the water or aquatic facility (such as at gyms) due to an emergency.”*

Enforcement: *“Ensure that lifeguards who are actively lifeguarding are not also expected to monitor social distancing, use of cloth masks, or handwashing of others. Assign these monitoring duties to staff that is not actively lifeguarding.”*

IRMA Guidance: Member must determine how to effectively communicate and maintain social distancing at their facility. Assigning staff to this duty may not be realistic in all scenarios. All efforts to communicate rules and regulations to the public should be made including signage, regular announcements, and website information. In addition to the above, consider reducing and/or spacing out deck chairs, altering queue lines for water features, or potentially closing areas of the facility either temporarily or permanently to free up staff or space.

There is no doubt that this summer season will look different than any in years past. It is more important than ever before to constantly evaluate and adjust procedures based on successes and failures of implementation. Finally, guidelines change frequently. Be sure to regularly check for updates:

CDC Considerations for Public Pools, Hot Tubs, and Water Playgrounds:
<https://www.cdc.gov/coronavirus/2019-ncov/community/parks-rec/aquatic-venues.html>

IDPH Restore IL Phase 4 Swimming Facility Guidelines:
<https://www.dph.illinois.gov/covid19/community-guidance/swimming-facility-guidelines>

For more in this or any other topic, please visit the [IRMA website](#) or reach out to any member of the Risk Management & Training Department.