Middle Tennessee State University
Camp Crisis and Risk Management Plan

By: G. Stephens, J.D., LL.M. - AVP for Compliance and ERM
Draft Date: 5/6/2017
Approved By: Alan Thomas - VP for Business and Finance

Table of Contents

	Page
Section One: Camp Crisis and Risk Management Documentation	
1.01 Introduction…….	3
1.02 Camp Crisis and Risk Management Checklist……..	4-5
1.03 Waivers, Permissions, and Agreements for Participation……...	6
1.04 Personal Medications……	6-7
1.05 Incident Reporting……	7-9
1.06 MTSU Resources for Crisis Response……..	10
Section Two: Camp Risk Management Planning	
2.01 Emergency Response……...	11
2.02 Total and Partial Lock Down…….	11
2.03 Inappropriate Adult-to-Camper or Camper-to-Camper Contact……..	12
Section Three: Camp Program Administration	
3.01 Parent Notification of Changes…….	13
3.02 Guests on Site…….	13
3.03 Emergency Drills…….	14
3.04 Program Records Retention…….	15
3.05 Applicable Federal and State Laws…….	16

Section One: Camp Crisis and Risk Management Documentation

I.01 Introduction

Camp safety is an important part of Middle Tennessee State University's (MTSU, Institution, 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 such camps are University sponsored, independently operated, or sponsored privately by the University's Athletics coaches. 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 some federal and state laws applicable to camps. 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.

I.02 Camp Crisis and Risk Management Checklist

Utilization of a Camp Crisis and 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 improvements.

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

Camp Crisis and 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 that camp participants have adequate documentation in advance of camp participation. The camp should have a record of the waivers, permission, and agreements of each parent or guardian regarding program participation; the use of University equipment (if applicable); camp supervision; health and safety emergencies; acceptance of risk (if applicable); and acceptance of responsibility, where applicable.

The following are key questions for camp sponsors as part of their camp crisis and risk response documentation:

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. Where are the waivers, permissions, and agreements for participation kept at the camp? Who has copies of the aforementioned forms, and who has access to the forms?

4. What are the inherent risks assumed in the agreement for participation?

5. Do the permissions include:

    a. Photo releases?
    b. Medical treatment?
    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?

6. 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, or medical expenses?

1.04 Personal Medications

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

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

<table>
<tr><td colspan="5">Medication Plan and Log</td></tr>
<tr><td rowspan="5"></td><td>Camper Name</td><td colspan="3">Medication</td></tr>
<tr><td></td><td colspan="3"></td></tr>
<tr><td></td><td colspan="3"></td></tr>
<tr><td></td><td colspan="3"></td></tr>
<tr><td></td><td colspan="3"></td></tr>
<tr><td rowspan="5"></td><td>Camper Name</td><td>Medication</td><td colspan="2">Nature of Emergency</td></tr>
<tr><td></td><td></td><td colspan="2"></td></tr>
<tr><td></td><td></td><td colspan="2"></td></tr>
<tr><td></td><td></td><td colspan="2"></td></tr>
<tr><td></td><td></td><td colspan="2"></td></tr>
<tr><td>1. Person(s) responsible for dispensing emergency medications:</td><td colspan="4"></td></tr>
<tr><td>2. Locked location where medications are kept:</td><td colspan="4"></td></tr>
<tr><td>3. Person(s) with key access to locked location of medications:</td><td colspan="4"></td></tr>
<tr><td rowspan="4"></td><td rowspan="4"></td><td colspan="3">List refrigerated medications</td></tr>
<tr><td colspan="2"></td><td></td></tr>
<tr><td colspan="2"></td><td></td></tr>
<tr><td colspan="2"></td><td></td></tr>
<tr><td>5. Person responsible for checking that medications are prescribed to the person receiving the medication:</td><td colspan="4"></td></tr>
</table>

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 to the appropriate resource 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, in case of legal action, and 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:

- Who is responsible for completing incident reports?
- Where are completed incident reports kept?
- Who is to receive a copy of the incident report?
- How soon after the incident occurs must the incident report be completed?
- How is data reviewed and monitored regarding trends in the number and types of incidents?

In addition to the above questions, utilizing an incident report that similar to the one recommended by the American Camp Association (ACA) is a useful tool for both documenting and tracking incidences. MTSU sponsored camps can utilize their existing incident reporting forms or they may consider utilizing the one developed by the ACA, which is provided below:

Accident/Incident Report Form

Developed by the *American Camp Association*®

(Fill out 1 on each incident or person)

Camp Name _____ Date _____

Address _____

Street & Number City State Zip

Name of Person Involved_____ Age ___ Sex _____ ☐ Camper ☐ Staff ☐ Visitor

Last First Middle

Address _____ Phone _____

Street & Number City State Zip Area/Number

Name of Parent/Guardian (if minor) _____

Address _____Phone _____

Street & Number City State Zip Area/Number

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 occurred? (*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 University offices that may need to be contacted during emergency situations. These contacts are secondary to first responders, such as police, fire, ambulance, and other emergency management agencies.

1. Office of the Vice President for Business and Finance
   Cope Administration Building, Room 119
   Office: (615) 898-2852
   Fax: (615) 898-5906
   Email: alan.thomas@mtsu.edu

2. University Police, Chief of Police
   1412 East Main Street
   Office: (615) 898-2424
   Fax: (615) 898-5041
   buddy.peaster@mtsu.edu

3. Student Affairs, Housing and Residential Life, Director
   Office: (615) 898-2971
   Fax: (615) 898-5429
   michelle.safewight@mtsu.edu

4. Student Affairs, Campus Recreation, Director
   1848 Blue Raider Drive
   Office: (615) 898-2104
   charlie.gregory@mtsu.edu

5. Facilities Services, Assistant Vice President for Facilities Services
   Office: (615) 898-2414
   joe.whitefield@mtsu.edu

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 also should 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 EMS and Police numbers.

2.02 Total and Partial Lock Down

Camp directors and staff should have procedures for total and partial lock down of the camp area 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. 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:

<u>Total Lock Down</u>

- Contact 911 and any other emergency phone numbers.
- 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

- Same procedures as above in the Total Lock Down scenario, except that camp activities/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 contracted with MTSU also are expected to have documentation of criminal background checks on any adult participating in the camp, whether volunteer or staff, and whether or not such criminal background check requirement is included in the contract between the camp and the University (note: all University employees have full background checks on record with the Office of Human Resources as part of the employment screening process).

Reporting and Supervision. For MTSU and University Athletics sponsored camps (or camps sponsored independently by MTSU Athletics coaches), the reporting procedures outlined in Section IV(A), subsections 6 – 9 of University Policy I:01:07 – “Minors

Participating in University-Sponsored Programs or Programs or Programs Using University Facilities" (Minors Policy) In addition, Section IV(A), subsections 1 – 5(a-g), of the Minors Policy provides requirements and responsibilities for program sponsors and directors related to the supervision and care of minors, as well as prohibitions regarding specific types of contact with minors. Where external sponsored camps utilizing MTSU property, equipment, and facilities do not have a policy for the reporting and supervision of camp participants, a copy of the University's Minors Policy shall be provided to the camp sponsor or director.`

Section Three: Camp Program Administration

3.01 Parent Notification of Changes

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 change in the camp environment or facility that affects the 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.
- 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 maintain a record and list of emergency phone numbers for camp participants.

3.02 Guests on Site

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 camper safety regarding on-site 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 under what conditions visitors are allowed on site, and when. 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 Program and 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 in analyzing and maintaining camp records for risk management, insurance, legal, 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)
- Staff and volunteer background check screenings
- Medical or health histories of camp participants
- Staff list and positions
- Participation Agreements
- 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 Applicable Federal and State Laws

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.

REFERENCES

1. American Camp Association, *https://www.acacamps.org*.

2. 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.

3. Rose, Jen. SportRisk, *It's Not All Fun & Games: Risk Management for Summer Day Camps* (Mar. 22, 2012).

4. Virginia Graeme Baker Pool & Spa Safety Act of 2007, as amended, 15 U.S.C. 8001 – 8008 (amended Dec. 2014).

5. 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.

6. University of California, Marianne Bird and Jim Brenner, Agriculture & Natural Resources, 4-H Youth Development Program, *Camp Risk Assessment Workbook* (May 2006).