

WATER SAFETY CERTIFICATION REQUIREMENTS FOR THERAPEUTIC AND RECREATIONAL SWIMMING POOL STAFF

1. REASON FOR ISSUE: This Veterans Health Administration (VHA) directive establishes policy for minimum requirements for water safety certification when providing rehabilitation treatment programs or instructional swimming in VHA therapeutic and recreational swimming pools.

2. SUMMARY OF MAJOR CHANGES: This VHA directive reflects updated responsibilities, certification, and training for the clinical provision of aquatic therapy and recreational swimming and activities. The directive also requires Department of Veterans Affairs (VA) medical facilities with a therapeutic or recreational swimming pool to conduct a proactive risk assessment with consideration of pool size and the patient population utilizing the pool to determine need and appropriate number of lifeguards on deck to provide surveillance and monitoring for VHA pools.

3. RELATED ISSUES: VHA Directive 1170.03, Physical Medicine and Rehabilitation Service, dated November 5, 2019; VHA Directive 1172.05, Recreation Therapy Service, dated February 1, 2017; VHA Directive 1177, Cardiopulmonary Resuscitation, dated August 28, 2018; and VHA Handbook 1050.01, VHA National Patient Safety Improvement, dated March 4, 2011.

4. RESPONSIBLE OFFICE: The Deputy Chief Patient Care Services Officer for Rehabilitation and Prosthetic Services (10P4R) is responsible for the contents of this VHA directive. Questions may be referred to the National Director, Physical Medicine and Rehabilitation Service (PM&RS), at VHA10P4RAction@va.gov or VHA12RPSRehabandProstheticsAction@va.gov.

5. RESCISSIONS: VHA Directive 1040, Certification Requirements for Therapeutic and Recreational Swimming Pool Staff, dated January 13, 2015, is rescinded.

6. RECERTIFICATION: This VHA directive is scheduled for recertification on or before the last working day of May 2025. This VHA directive will continue to serve as national VHA policy until it is recertified or rescinded.

**BY THE DIRECTION OF THE OFFICE OF
THE UNDER SECRETARY FOR HEALTH:**

/s/ Lucille B. Beck, PhD
Deputy Under Secretary for Health

May 4, 2020

VHA DIRECTIVE 1040

for Policy and Services

NOTE: *All references herein to VA and VHA documents incorporate by reference subsequent VA and VHA documents on the same or similar subject matter.*

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WATER SAFETY CERTIFICATION REQUIREMENTS FOR THERAPEUTIC AND RECREATIONAL SWIMMING POOL STAFF

1. PURPOSE

This Veterans Health Administration (VHA) directive defines the water safety certifications necessary to conduct safe aquatic therapy treatment and instructional swimming programs in Department of Veterans Affairs (VA) therapeutic and recreational swimming pools. **AUTHORITY:** Title 38 United States Code (U.S.C.) 7301(b).

2. BACKGROUND

a. Aquatic therapy refers to water-based physical medicine treatments or exercises of therapeutic purpose utilizing evidence-based practice. Treatments and exercises are performed while floating, partially submerged, or fully submerged in water. Many aquatic therapy procedures require constant attendance by a rehabilitation therapist and are performed in a specialized temperature-controlled pool. Aquatic therapy commonly focuses on improving the physical function associated with illness, injury, or disability. The term aquatic therapy encompasses a broad set of approaches and techniques, including aquatic exercise, physical medicine and rehabilitative therapies, aquatic bodywork, and other movement-based therapy in water. Treatment may be passive, directly involving a therapist assisting and supporting a patient's movements, or active, involving self-generated body positions, movement, or exercise. VHA Physical Medicine and Rehabilitation Service (PM&RS), including Kinesiotherapists (KTs), Occupational Therapists (OTs), Physical Therapists (PTs), and Recreation Therapists (RTs) provide aquatic therapy within their professional scope of practice.

b. There are multiple purposes for pools across VHA. Some VA medical facilities have swimming pools available for use by certain patients for recreational purposes or as a therapeutic platform for providing aquatic therapy. VHA pools may also be accessible to staff, including Chaplains performing baptisms, and outside organizations who have Memorandums of Agreement (MOA) or alternatively formed contracts with a VA medical facility.

3. POLICY

It is VHA policy that every VHA therapeutic and recreational swimming pool program be under the direct supervision of a VHA rehabilitation therapist having current water safety certifications; and an appropriate number of certified personnel must be present during its hours of operation, as determined by the VA medical facility Director.

4. RESPONSIBILITIES

a. **Under Secretary for Health.** The Under Secretary for Health is responsible for ensuring overall VHA compliance with this directive.

b. **Deputy Under Secretary for Health for Operations and Management.** The Deputy Under Secretary of Health for Operations and Management is responsible for:

(1) Communicating the contents of this directive to each of the Veterans Integrated Service Network (VISN) Directors.

(2) Ensuring that each VISN Director has the sufficient resources to implement this directive in all VA medical facilities with therapeutic and recreational swimming pool programs within that VISN.

(3) Providing oversight of VISNs to ensure compliance with this directive, relevant standards, and applicable regulations.

c. **Deputy Under Secretary for Health for Policy and Services.** The Deputy Under Secretary for Health for Policy and Services is responsible for:

(1) Communicating the contents of this directive throughout the Office of the Deputy Under Secretary for Health for Policy and Services.

(2) Supporting the implementation and oversight of this directive across VHA.

d. **Deputy Chief Patient Care Services Officer for Rehabilitation and Prosthetic Services.** The Deputy Chief Patient Care Services Officer for Rehabilitation and Prosthetic Services is responsible for:

(1) Providing oversight, guidance, and implementation support for deployment and compliance with this directive.

(2) Communicating changes within the provision of therapeutic and recreational swimming pool programs to the Deputy Under Secretary for Health for Policy and Services.

e. **National Director, Physical Medicine and Rehabilitation Service.** The National Director, PM&RS, is responsible for:

(1) Ensuring development and maintenance of this directive for water safety certification of all pool staff.

(2) Ensuring field compliance with this directive.

(3) Providing clinical consultation and guidance to VISN Directors and VA medical facility Directors for the development and provision of physical medicine and rehabilitation programs within VHA pools.

(4) Receiving and reviewing communication of pertinent Veteran care, aquatic rehabilitation service delivery issues, and business plans to address programming changes from the VA medical facility Service Line manager and Recreation Therapy Service (RTS) Chief.

f. **National Director, Recreation Therapy Service.** The National Director, RTS, is responsible for:

(1) Collaborating with the National Director, PM&RS to support the development and maintenance of and field compliance with this directive.

(2) Providing clinical consultation and guidance to VISN Directors and VA medical facility Directors for the development and provision of recreational therapy programs within VHA pools.

(3) Receiving and reviewing communication of pertinent Veteran care, recreational swimming service delivery issues, and business plans to address programming changes from the VA medical facility PM&RS Chief or Service Line manager.

g. **Veterans Integrated Service Network Director.** Each VISN Director is responsible for:

(1) Ensuring that sufficient resources are available to VA medical facilities with therapeutic and recreational swimming pool programs.

(2) Ensuring that therapeutic and recreational swimming pool programs are provided in compliance with this directive.

(3) Communicating requirements within this directive to VA medical facility Directors.

(4) Consulting with the National Director, PM&RS; National Director, RTS; and VA medical facility Directors on the development and provision of the therapeutic and recreational swimming programs.

h. **VA Medical Facility Director.** In VA medical facilities where there are therapeutic and recreational swimming pool programs, the VA medical facility Director is responsible for:

(1) Implementing and maintaining the appropriate staffing within rehabilitation services to provide aquatic therapy and recreational swimming within the VA medical facility.

(2) Providing oversight to ensure that VA medical facility staff with swimming pools comply with this directive.

(3) Ensuring certified personnel, as outlined in paragraphs 5.a. through 5.c., are in the immediate pool area when the pool is in use.

(4) Ensuring that the proactive risk assessment outlined in VHA Handbook 1050.01, VHA National Patient Safety Improvement, dated March 4, 2011 includes all VHA pools and is coordinated by Patient Safety Manager or designated subject matter expert for VA medical facility safety training. ***NOTE: The need and appropriate number of certified lifeguards is recommended by the local team of subject matter experts designated to conduct the proactive risk assessment with consideration to pool size and local VA medical facility's patient population utilizing VHA pools. If staff are conducting diversional or recreational activities that occur in recreational swimming pool depths***

greater than 5 feet, it is recommended to have a dedicated certified lifeguard on deck with no other duties while providing surveillance and monitoring of patients in the pool.

(5) Approving the use of VHA pools by external organizations or child care programs, via MOA or an alternatively formatted contract. **NOTE:** *External organizations are only allowed access to VHA swimming pools if they provide their own adequate number of certified lifeguards with current certificates of training. These current certificates of training must be made available to the VA medical facility Director prior to approval for use of the pool. VA medical facilities that have child care programs or day care programs requesting to utilize the VHA swimming pools must provide their own certified lifeguards with current certificates of training, which must be provided by the Child Care Program Director to the VA medical facility Director prior to approval for use of the pool.*

(6) Approving exemptions for lifeguard certifications and water safety instructor certifications for Chaplains utilizing the pool for baptismal services. **NOTE:** *Chaplains utilizing the pool for baptismal services may be exempted from obtaining lifeguard certification and water safety instructor certifications. However, when there are no chaplains properly certified it is recommended that provision will be made for personnel appropriately certified in cardiopulmonary resuscitation (CPR) and basic water safety to attend, but not participate in the baptismal service, unless specific assistance in handling of the person to be baptized is clinically required.*

(7) Consulting with the National Director, PM&RS; National Director, RTS, and VISN Directors on the development and provision of the therapeutic and recreational swimming pool treatment programs.

(8) Receiving and reviewing communication of pertinent Veteran care, therapeutic and recreational swimming service delivery issues, and business plans to address programming changes from the PM&RS Chief, Service Line manager, and RTS Chief.

(9) Determining the availability of training funds for required and recommended training (see paragraph 5 a.-c.).

(10) Providing oversight to ensure that VA medical facility staff comply with this directive.

i. **Physical Medicine and Rehabilitation Service, Chief or Service Line Manager, and Recreation Therapy Service Chief.** The organization of Recreation Therapy varies at VA medical facilities: Recreation Therapy may fall under PM&RS or it may be a separate service with a distinct Chief from PM&RS. For VA medical facilities that have both a PM&RS and an RTS, the PM&RS Chief is responsible for the therapy pool if it is a separate from the recreational swimming pool and the RTS Chief is responsible for the recreational swimming pool. The PM&RS Chief or Service Line manager and RTS Chief are responsible for:

(1) Ensuring communication of pertinent Veteran care, aquatic rehabilitation and recreational swimming policy revisions, service delivery issues, and business plans to

VA medical facility Chief of Staff, VA medical facility Director, PM&RS National Director, RTS National Director, and local PM&RS and RTS staff utilizing the pool(s).

(2) Ensuring compliance with this directive for the provision of rehabilitation and recreational swimming within the aquatic environment, including documentation of certification within the staff competency and training folder.

(3) Recommending to the VA medical facility Director projected staffing needs to support the therapeutic and recreational swimming pool program within a business plan.

NOTE: *Any such recommendations are based on information and data PM&RS and RTS VA medical facility staff have collected and analyzed (e.g., supply and demand, staffing workload and productivity reports).*

(4) Overseeing the care rendered by rehabilitation personnel providing aquatic therapy and recreational swimming instruction, as defined by the discipline scope of practice, qualification standard, individual staff competency, and certification for provision of aquatic therapy and recreational swimming.

(5) Determining the appropriate number of staff required to provide aquatic therapy and recreational swimming or activities based on workload demand with consideration of the types of impairments and physical limitations of the patient population. This includes non-lifeguard staff therapists treating patients and providing input on the appropriate number of lifeguard staff within the risk assessment.

j. **VHA Rehabilitation Therapists.** VHA Rehabilitation therapists providing aquatic therapy or recreational swimming are responsible for:

(1) Providing aquatic therapy and recreational swimming instruction within the limits of their academic preparation, certifications, and approved scope of practice. **NOTE:** *Scopes of practice are established by each discipline's professional organization and the professional organization ensures that the therapy practitioner meets the standards for education, credentialing, and professional competence. For more information regarding scope of practice see VHA Directive 1170.03, Physical Medicine and Rehabilitation Service, dated November 5, 2019, VHA Directive 1172.05, Recreation Therapy Service, dated February 1, 2017, VHA Directive 2012-030, Credentialing of Health Care Professionals, dated October 11, 2012, and VHA Handbook 1100.19, Credentialing and Privileging, dated October 15, 2012.*

(2) Maintaining the licensure, certification, and registration credential as required in accordance with VHA Directive 1170.03, VHA Directive 1172.05, VHA Directive 2012-030, and VHA Handbook 1100.19.

(3) Maintaining compliance with requirements within this directive.

k. **Swimming Pool Operator.** Therapists treating patients in VHA pools may have additional local duties assigned as the Swimming Pool Operator but staff assigned environmental management responsibilities are responsible for maintenance and operational responsibilities for the pool, and to maintain the pool deck areas, locker

rooms, and restrooms in a sanitary manner in accordance with VHA Directive 1608, Comprehensive Environment of Care (CEOC) Program, dated February 1, 2016, and established guidelines and policies.

5. TRAINING

a. The following training and certifications are required for all PTs, KT, OTs, and RTs providing aquatic therapy or recreational swimming instruction:

(1) For any personnel responsible for conducting aquatic therapy and certain recreational or leisure activities (e.g., aquatic exercise, water aerobics, water game activities, employee fitness in small groups (one to four people), swimming instruction) using VHA pool facilities, the minimum trainings and certifications are to:

(a) Successfully complete and maintain current Basic Life Support certification required for all clinically active staff in accordance with VHA Directive 1177 Cardiopulmonary Resuscitation, dated August 28, 2018; and

(b) Successfully complete Basic Water Rescue Training and maintain certification.

(2) For any staff conducting recreational swimming instruction (i.e., therapy personnel teaching basic swimming strokes or lessons to patients who cannot swim), Water Safety Instructor Training and Certification is required. **NOTE:** *This does not include adaptations or swimming techniques provided in a therapeutic or rehabilitative manner.*

b. The following trainings are recommended, at the funding discretion of the VA medical facility director (see paragraph 4.h.(11)):

(1) Certification of personnel providing therapeutic rehabilitation and recreational therapy in Lifeguard Training, Water Safety Training, First Aid and CPR/Automated External Defibrillator (AED) for Professional Rescuers and Health Care Providers Training, or equivalent safety training courses and advanced aquatic therapy training to support therapeutic and recreational swimming pool programs.

(2) Advanced training, continuing education, and certification for personnel involved in one-on-one or small group (i.e., one to four patients) therapy programs in aquatic therapy techniques (e.g., Aquatic Therapy and Rehabilitation Industry Certification (ATRIC), The Arthritis Foundation Aquatic Program, Aquatic Exercise Association (AEA) Aquatic Fitness Professional Certification, Adapted Aquatics Instructor).

c. Available certifications and education programs for completing the required and recommended training include:

(1) American Red Cross (ARC) Lifeguard Training. Available at: <http://www.redcross.org/take-a-class/learn-about-our-programs>.

(2) Young Men's Christian Association (YMCA) Lifeguard Training. Available at: <http://www.ymca.net>.

(3) American Lifeguard Association Lifeguard Training. Available at: <https://americanlifeguard.com>.

(4) Ellis & Associates Lifeguard Training. Available at: <https://jellis.com/services/lifeguard-certification>.

(5) ARC Water Safety Instructor. Available at: <http://www.redcross.org/take-a-class/Learn-About-Our-Programs>.

(6) ARC Basic Water Rescue. Available at: <https://www.redcross.org/take-a-class/swimming/water-safety>.

6. RECORDS MANAGEMENT

All records regardless of format (e.g., paper, electronic, electronic systems) created by this directive shall be managed per the National Archives and Records Administration (NARA) approved records schedules found in VA Records Control Schedule 10-1. Questions regarding any aspect of records management should be addressed to the appropriate Records Manager or Records Liaison.

7. REFERENCES

- a. 38 U.S.C. 7301(b).
- b. VHA Directive 1170.03, Physical Medicine and Rehabilitation Service, dated November 5, 2019.
- c. VHA Directive 1172.05, Recreation Therapy Service, dated February 1, 2017.
- d. VHA Directive 1177 Cardiopulmonary Resuscitation, dated August 28, 2018.
- e. VHA Directive 1608, Comprehensive Environment of Care (CEOC) Program, dated February 1, 2016.
- f. VHA Directive 2012-030, Credentialing of Health Care Professionals, dated October 11, 2012.
- g. VHA Handbook 1050.01, VHA National Patient Safety Improvement Handbook, dated March 4, 2011.
- h. VHA Handbook 1100.19, Credentialing and Privileging, dated October 15, 2012.
- i. American Lifeguard Association Web site. Available at: <https://americanlifeguard.com>.

j. American Red Cross Web site. Available at: <http://www.redcross.org/take-a-class/learn-about-our-programs>.

k. American Red Cross Basic Water Rescue Web site. Available at: <https://www.redcross.org/take-a-class/swimming/water-safety>.

l. American Red Cross and American Lifeguard Association First Aid and Cardiopulmonary Resuscitation/Automated External Defibrillation for the Professional Rescuer and Health Care Provider Training courses Available at: <https://www.redcross.org/take-a-class/cpr/cpr-training/cpr-for-healthcare-providers>.

m. American Safety & Health Institute Web site. Available at: <http://www.hsi.com/takeaclass>.

n. Aquatic Exercise Association Web site. Available at: <http://www.aeawave.com>.

o. Aquatic Therapy & Rehab Institute Web site. Available at: www.atri.org.

p. Arthritis Foundation Web site. Available at: <http://www.arthritis.org>.

q. Ellis & Associates Lifeguard Training. Available at: <https://jellis.com/services/lifeguard-certification>.

r. Young Men's Christian Association (YMCA) Web site. Available at: <http://www.ymca.net>.