

WATER SAFETY CERTIFICATION REQUIREMENTS FOR THERAPEUTIC AND RECREATIONAL SWIMMING POOL STAFF

1. SUMMARY OF MAJOR CHANGES: This directive updates responsibilities for the Executive Director, Rehabilitation and Prosthetic Services (RPS); Executive Director, Physical Medicine and Rehabilitation Service (PM&RS); Department of Veterans Affairs (VA) medical facility Director; VA medical facility Physical Medicine and Rehabilitation Service, Chief or Service Line Manager; and Recreation Therapy and Creative Arts Therapy (RT/CATS) Service Chief in paragraph 2.

2. RELATED ISSUES: VHA Directive 1050.01(1), VHA Quality and Patient Safety Programs, dated March 24, 2023; VHA Directive 1170.03, Physical Medicine and Rehabilitation Service, dated November 21, 2024; VHA Directive 1172.05, Recreation Therapy and Creative Arts Therapy Service, dated September 7, 2022; and VHA Directive 1177, Cardiopulmonary Resuscitation, dated January 4, 2021.

3. POLICY OWNER: The Executive Director, Veterans Health Administration (VHA) Rehabilitation and Prosthetic Services (12RPS) is responsible for the content of this directive. Questions may be referred to the Executive Director, PM&RS and National Director, RT/CATS, at VHA12RPSRehabandProstheticsAction@va.gov.

4. LOCAL DOCUMENT REQUIREMENTS: None.

5. RESCISSIONS: VHA Directive 1040, Water Safety Certification Requirements for Therapeutic and Recreational Swimming Pool Staff, dated May 4, 2020, is rescinded.

6. RECERTIFICATION: This VHA directive is scheduled for recertification on or before the last working day of April 2030. This VHA directive will continue to serve as national VHA policy until it is recertified or rescinded.

7. IMPLEMENTATION SCHEDULE: This directive is effective 3 months after publication.

April 16, 2025

VHA DIRECTIVE 1040

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

/s/ M. Christopher Saslo
DNS, ARNP-BC, FAANP
Assistant Under Secretary for Health
for Patient Care Services/CNO

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

DISTRIBUTION: Emailed to the VHA Publications Distribution List on April 17, 2025.

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WATER SAFETY CERTIFICATION REQUIREMENTS FOR THERAPEUTIC AND RECREATIONAL SWIMMING POOL STAFF

1. POLICY

It is Veterans Health Administration (VHA) policy that every Department of Veterans Affairs (VA) therapeutic and recreational swimming pool be under the direct supervision of a VA medical facility Rehabilitation Therapist (e.g., Kinesiotherapist (KT), Occupational Therapist (OT), Physical Therapist (PT) or Recreation Therapist (RT)) who has current water safety certifications, with an appropriate number of certified personnel present during its hours of operation, as determined by the VA medical facility Director. **AUTHORITY:** 38 U.S.C. § 7301(b).

2. RESPONSIBILITIES

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

b. **Chief Operating Officer.** The Chief Operating Officer (COO) is responsible for:

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

(2) Assisting VISN Directors to resolve implementation and compliance challenges in all VA medical facilities within that VISN.

(3) Overseeing VISNs to ensure effectiveness of and compliance with this directive.

c. **Assistant Under Secretary for Health for Patient Care Services/Chief Nursing Officer.** The Assistant Under Secretary for Health for Patient Care Services/Chief Nursing Officer (CNO) is responsible for:

(1) Supporting the Office for Rehabilitation and Prosthetic Services (RPS) with implementation and oversight of this directive.

(2) Supporting the development of mitigation or corrective actions to address noncompliance with this directive.

d. **Executive Director, Rehabilitation and Prosthetic Services.** The Executive Director, RPS, is responsible for:

(1) Collaborating with the Executive Director, Physical Medicine and Rehabilitation Service (PM&RS), to provide executive oversight for development of this policy, guidance, and implementation support to the COO for VISN and VA medical facility deployment and compliance with this directive.

(2) Communicating changes within the provision of aquatic therapy, wellness, and sports clinical programs within therapeutic and recreational swimming pools to the COO.

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

(1) Collaborating with the Executive Director, RPS, to provide executive oversight for development of this policy, guidance, and implementation support to the COO for VISN and VA medical facility deployment and compliance with this directive.

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

(3) Consulting with the National Director, Recreation Therapy and Creative Arts Therapy Service (RT/CATS) and VISN Director to review and respond to aquatic therapy service delivery issues to address programming changes from VA medical facility Directors.

(4) Consulting with the National Director, RT/CATS and VISN Director on the development and provision of aquatic therapy, wellness, and sports clinical programs within therapeutic and recreational swimming pools at VA medical facilities within the VISN.

f. **National Director, Recreation Therapy and Creative Arts Therapy Service.** The National Director, RT/CATS, is responsible for:

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

(2) Consulting with the Executive Director, PM&RS and VISN Director to review and respond to aquatic therapy service delivery issues to address programming changes from VA medical facility Directors.

(3) Consulting with the Executive Director, PM&RS and VISN Director on the development and provision of aquatic therapy, wellness, and sports clinical programs within therapeutic and recreational swimming pools at VA medical facilities within the VISN.

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

(1) Ensuring that all VA medical facilities within the VISN comply with this directive and informing the Assistant Under Secretary for Health for Patient Care Services/CNO and the COO when barriers to compliance are identified.

(2) Overseeing actions to correct operational noncompliance at the VISN and VA medical facilities within the VISN.

(3) Ensuring that aquatic therapy, wellness, and sports clinical programs within therapeutic and recreational swimming pools within the VISN are provided in compliance with this directive.

(4) Reviewing communications from the VA medical facility Director on the development and provision of clinical services provided within therapeutic and recreational swimming pools at VA medical facilities within the VISN; and consulting with the Executive Director, PM&RS and National Director, RT/CATS on the development and provision of aquatic therapy, wellness, and sports clinical programs within therapeutic and recreational swimming pools at VA medical facilities within the VISN.

(5) Consulting with the Executive Director, PM&RS and National Director, RT/CATS to review and respond to aquatic therapy service delivery issues to address reports regarding programming changes from VA medical facility Directors.

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

(1) Ensuring overall VA medical facility compliance with this directive and taking corrective action if non-compliance is identified.

(2) Ensuring that pools are operated under direct supervision of a VA medical facility Rehabilitation Therapist having current water safety certifications; see paragraph 4 for additional information.

(3) Ensuring that VA medical facility certified personnel who have completed all training required by paragraphs 4 are in the immediate pool area when the pool is in use.

(4) Approving the use of VHA pools by external organizations or child care programs via Memorandums of Agreement (MOA), community-care network, or sharing agreement. ***NOTE: External organizations are only allowed access to VHA swimming pools if they provide their own certified lifeguards with current certifications. The current certificates must be made available by the VA medical facility Child Care Program Director to the VA medical facility Director prior to approval for use of the pool. For VA medical facilities that have child care programs or day care programs requesting to utilize VHA swimming pools, those programs must provide their own certified lifeguards with current proof of certification, which must be provided by the VA medical facility Child Care Program Director to the VA medical facility Director prior to approval for use of the pool. For VA medical facilities that do not have child care or day care programs, external organizations must provide lifeguard certificates to the VA medical facility Director prior to approval for use of the pool.***

(5) 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 be made for personnel 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.*

(6) Communicating with the VISN Director the need for the development and provision of aquatic therapy, wellness, and sports clinical programs within therapeutic and recreational swimming pools based on business plans sent by the VA medical facility PM&RS Chief, Service Line Manager and VA medical facility RT/CAT Service Chief.

(7) Receiving and reviewing business plans from the VA medical facility PM&RS Chief, Service Line Manager, and VA medical facility RT/CAT Service Chief related to Veteran care and aquatic therapy service delivery that address program changes and providing concurrence before routing to the VISN Director.

(8) Determining or ensuring the availability of funds for required and recommended certifications to meet competency training (see paragraph 4).

i. VA Medical Facility Physical Medicine and Rehabilitation Service, Chief or Service Line Manager and Recreation Therapy and Creative Arts Therapy Service Chief. The organization of RT/CATS varies at VA medical facilities; RT/CATS may fall under PM&RS, or it may be a separate service with a distinct Chief from PM&RS. There also may be VA medical facilities where there is only one therapeutic pool or one recreational swimming pool. For VA medical facilities that have both a PM&RS and an RT/CATS and both a therapeutic and recreational swimming pool, the VA medical facility PM&RS Chief is responsible for the therapy pool if it is a separate pool from the recreational swimming pool, and the VA medical facility RT/CATS Chief is responsible for the recreational swimming pool. **NOTE:** *A VA medical facility RT/CATS Chief or a PM&RS Chief or Service Line Manager may have oversight for the one swimming pool or the one therapeutic pool solely.* The VA medical facility PM&RS Chief or Service Line Manager and VA medical facility RT/CAT Service Chief are responsible for:

(1) Determining whether development of additional local clinical memoranda pertaining to the aquatic therapy, wellness, and sports clinical programs within therapeutic and recreational swimming pools at the VA medical facility is necessary and disseminating this to VA medical facility Rehabilitative Therapists providing aquatic therapy, aquatic wellness, and aquatic sports clinical programs.

(2) Communicating service delivery issues and business plans related to aquatic therapy to the VA medical facility Director.

(3) Ensuring that VA medical facility Rehabilitation Therapists providing aquatic therapy, wellness, and sports programs within therapeutic and recreational swimming pools maintain necessary competency certifications as defined by the discipline scope of practice and qualification standards. **NOTE:** See paragraph 4 for certification requirements.

(4) Determining the appropriate number of VA medical facility Rehabilitation Therapists required to provide aquatic therapy, wellness, and sports clinical programs (including but not limited to recreational swimming) or activities; recommending the projected staffing needs to support these programs within a business plan; and sending the business plan to the VA medical facility Director. **NOTE:** Staffing recommendations must be based on workload demand with consideration of the types of impairments and physical limitations of the Veteran population being served. This includes non-lifeguard staff therapists treating Veterans and providing input on the appropriate number of lifeguard staff. Any such recommendations are based on information and data PM&RS and RT/CATS staff at the VA medical facility have collected and analyzed (e.g., supply and demand, staffing workload and productivity reports).

j. **VA Medical Facility Child Care Program Director.** The VA medical facility Child Care Program Director is responsible for providing current certificates for certified lifeguards to the VA medical facility Director when requesting approval for use of the VHA swimming pool at VA medical facilities that have childcare programs or day care programs. **NOTE:** This only applies at VA medical facilities with a swimming pool, and only if the VA medical facility Child Care Program is requesting usage of the VHA recreational swimming pool.

k. **VA Medical Facility Rehabilitation Therapists.** VA medical facility Rehabilitation Therapists (PT, KT, OT, RT, and rehabilitation therapy assistants) providing aquatic therapy or recreational swimming are responsible for maintaining appropriate certifications in accordance with this policy (see paragraph 4 for additional information on required competency certifications), and licensure and registration credentials as required in accordance with VHA Directive 1170.03(1), Physical Medicine and Rehabilitation Service, dated November 5, 2019; VHA Directive 1172.05, Recreation Therapy and Creative Arts Therapy Service, dated September 7, 2022; VHA Directive 1100.20(2), Credentialing of Health Care Providers, dated September 15, 2021; and VHA Directive 1100.21(1), Privileging, dated March 2, 2023.

3. OVERSIGHT AND ACCOUNTABILITY

a. **Internal Controls.** The internal controls in this directive are:

(1) Leadership oversight as outlined in paragraph 2 of this directive.

(2) Collaboration among the Executive Director, PM&RS, National Director, RT/CATS, and VISN Director to review and respond to aquatic therapy business plans to address program changes from the VA medical facility Directors.

b. **Metrics.** To implement and facilitate VA medical facility therapeutic and recreational swimming pool programs, VA medical facility Rehabilitation Therapists providing aquatic therapy or recreational swimming, as described in paragraph 2.k., will maintain appropriate licensure, certification, and registration credentials as outlined in paragraph 4 of this directive.

4. TRAINING

a. The following certifications are required to meet minimum water safety competency assessments for all VA medical facility KT, PT, OT, and RT, including assistants supporting these therapy disciplines, providing aquatic therapy, aquatic wellness, and aquatic sports clinical programs within VHA therapeutic and recreational swimming pools.

(1) Basic Life Support certification required for all clinically active staff in accordance with VHA Directive 1177, Cardiopulmonary Resuscitation, dated January 4, 2021; and

(2) American Red Cross (ARC) Basic Water Safety/Rescue (BWS/BWR) Certification, available at: <https://www.redcross.org/take-a-class/swimming/water-safety> or by a local provider or community organization with the credentials for instruction of the ARC course and provision of BWS/BWR certification.

b. Staff conducting recreational basic swimming stroke instruction and swimming lessons to Veterans who cannot swim are required to obtain ARC Water Safety Instructor Certification (WSI); see <https://www.redcross.org/take-a-class/swimming/water-safety>. **NOTE:** *This does not include adaptations or swimming techniques provided in a therapeutic or rehabilitative manner. ARC WSI certification exceeds the minimum ARC BWS/BWR certification requirement (i.e., with a current ARC WSI certification, ARC BWS/BWR training and certification is not needed).*

c. Continuing education and specialty certification for KT, OT, PT, and RT and these therapy disciplines' assistants involved in one-on-one or small group (i.e., one to four Veterans) therapy programs in aquatic therapy techniques are encouraged to advance skills and meet specialized competency training for VA medical facility KT, PT, OT, and RTs (including assistants supporting these disciplines) who are providing aquatic therapy, aquatic exercise, aquatic wellness, and swimming instruction, at the funding discretion of the VA medical facility Director includes, but is not limited to:

(1) Aquatic Therapy and Rehabilitation Industry Certification (ATRIC),

(2) The Arthritis Foundation Aquatic Program, Aquatic Exercise Association (AEA) Aquatic Fitness Professional Certification,

(3) Adapted Aquatics Instructor Certification, or

(4) The therapy discipline's professional organization aquatic therapy clinical competency certification or specialization certificate.

d. The following certifications meet and exceed the BWS/BWR competency for VA medical facility KT, OT, PT, and RT and assistants who provide aquatic therapy and, during a separate clinic timeslot, provide surveillance for large group swimming instruction, aquatic exercise, or aquatic sports programs (if the VA medical facility is not utilizing fee basis or volunteer lifeguards). In this case, it is not necessary for the KT, OT, PT or RT and assistants to complete BWS/BWR, if water safety instructor or lifeguard certifications is obtained.

(1) ARC Water Safety Instructor (WSI). Available at: <http://www.redcross.org/take-a-class/Learn-About-Our-Programs>. **NOTE:** ARC WSI may certify additional VA staff for ARC Basic Water Safety Certification. ARC WSI meets competency certification requirements for basic swimming strokes or swimming instruction for Veterans unable to swim.

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

(3) Young Men's Christian Association (YMCA) Lifeguard Certification. Contact the local YMCA, or enter the local city or region, YMCA, and lifeguard training into a search engine for the listing of available classes. Available at: <http://www.ymca.net>.

(4) American Lifeguard Association Lifeguard Certification. Available at: <https://americanlifeguard.com>.

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

5. BACKGROUND

a. There are multiple purposes for pools across VHA. Some VA medical facilities have swimming pools available for use by certain Veterans for recreation purposes, whole health and wellness, or as a therapeutic platform for providing aquatic therapy. VHA pools may also be accessible to staff, including Chaplains performing baptisms and external organizations via an MOA, community-care network, or sharing agreement with a VA medical facility.

b. VA medical facility Rehabilitation Therapists (KTs, OTs, PTs, and RTs, including these disciplines' assistants) provide aquatic therapy within their professional scope of practice.

c. Aquatic therapy procedures require constant attendance by a rehabilitation therapist and are performed in a specialized temperature-controlled pool. Aquatic therapy focuses on improving the physical function associated with illness, disease, injury, or disability, as well as improving well-being. Aquatic therapy encompasses a broad set of approaches and techniques, including aquatic exercise, physical medicine and rehabilitative therapies, whole health aquatic bodywork (e.g., Watsu, Ai Chi, Aqua Yoga, mindfulness) and other movement-based therapy in water. Treatment may be

passive, directly involving a therapist assisting and supporting a Veteran's movements or active, involving self-generated body positions, movement, or exercise.

6. DEFINITIONS

Aquatic Therapy. Aquatic therapy refers to water-based physical medicine and rehabilitation treatments, specialized techniques, and exercises of therapeutic purpose utilizing evidence-based practice and where treatment techniques and exercises are performed while floating, partially submerged, or fully submerged in water.

7. RECORDS MANAGEMENT

All records regardless of format (for example, paper, electronic, electronic systems) created by this directive must be managed as required by the National Archives and Records Administration (NARA) approved records schedules found in VHA Records Control Schedule 10-1. Questions regarding any aspect of records management can be addressed to the appropriate Records Officer.

8. REFERENCES

- a. 38 U.S.C. § 7301(b).
- b. VHA Directive 1100.20(2), Credentialing of Health Care Providers, dated September 15, 2021.
- c. VHA Directive 1100.21(1), Privileging, dated March 2, 2023.
- d. VHA Directive 1170.03, Physical Medicine and Rehabilitation Service, dated November 21, 2024.
- e. VHA Directive 1172.05, Recreation Therapy and Creative Arts Therapy Service, dated September 7, 2022.
- f. VHA Directive 1177, Cardiopulmonary Resuscitation, dated January 4, 2021.
- g. VHA Directive 1608(1), Comprehensive Environment of Care Program, dated June 21, 2021.
- h. American Lifeguard Association. Available at: <https://americanlifeguard.com>.
- i. American Red Cross. Available at: <http://www.redcross.org/take-a-class/learn-about-our-programs>.
- j. American Red Cross Basic WSI Certification and Lifeguard Certification. Available at: <https://www.redcross.org/take-a-class/swimming/water-safety>.
- k. Ellis & Associates Lifeguard Certification. Available at: <https://jellis.com/services/lifeguard-certification>.

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