

COVID-19 (Coronavirus): day-camp risk management

By Tanya Crites

With the state mandated school closures and parents who are essential employees required to report to work, WCIA members are faced with the challenge of keeping essential services operational for the safety and welfare of citizens while helping employees who are parents navigate a childcare crisis.

If a member is considering allowing an on-site day-camp to accommodate employees' children during the school closures, it is important to evaluate the risks to determine if providing the service is feasible, then implementing risk controls to minimize risks where possible. In addition to the recommendations published in the WCIA Liability Resource Manual* guideline, *PAR.23 Day Camps*, consider the following:

RISK EXPOSURES

1. Inadequate facility or equipment
2. Inadequate cleaning/sanitizing/social distancing/hygiene for virus control
3. Inadequate screening of day-camp staff/volunteers
4. Negligent training of day-camp staff/volunteers
5. Negligent supervision
6. Discriminatory child selection process
7. Failing to offer disability accommodation
8. Not following safety protocols for sick children
9. Food service, handling and consumption
10. Dispensing medications to children

RISK CONTROLS include having written policies and protocols that address, but are not limited to, the following:

1. Facility or equipment: Consider the space available for accommodating children. Does it have a sink? What is the capacity? Can it be "child-proofed?" What equipment and supplies will be needed to operate a safe and sanitary environment?
2. Cleaning/sanitization/social distancing/hygiene for virus control: Follow the Centers for Disease Control (CDC) and local and state health department guidance on preventing the spread of virus.

3. Screening of day-camp staff/volunteers: Whoever may have unsupervised access to minors must pass a national background screening, provided by a professional background screening vendor, that complies with the Child and Adult Abuse Information Act (CAAIA). If using volunteers or hiring new staff, conduct reference checking also. This includes day-camp participant's older (teenage) siblings who may ask to volunteer. See Liability Resource Manual* guideline, *PAR.20 Background Screening for Parks and Rec and Other Programs*.
4. Training of day-camp staff/volunteers: Provide day-camp staff/volunteer training in the areas of supervising children, cleaning/sanitizing/hygiene, safety and emergency procedures, food handling and distribution, behavioral and disciplinary protocols, etc.
5. Supervision: Follow state and federal guidelines for adult staff/volunteer to child ratios. Inform parents of rules regarding visiting or removing an enrolled child during a work shift. Create sign-in and sign-out rosters and ensure only authorized individuals can sign-out a child. Do not allow staff/volunteers to ever be alone with a child. Always have program staff supervisor on site.
6. Child selection process: After determining capacity based on the facility and staffing, have written criteria for what work positions/employees qualify for participation in the day-camp program and qualifying criteria for participants, i.e. what ages and/or abilities of children qualify for participation. Do you allow children in diapers? Do you allow middle-schoolers? Do you allow certain mostly independent developmentally disabled children who may be older than your age limit? Be specific about qualifying criteria. Do not make exceptions for certain employees' children and not others.
7. Disability accommodation: If a parent and child otherwise meet the written qualifying criteria but a child needs a reasonable accommodation for a disability that would not cause an undue financial or administrative hardship on the agency or fundamentally alter the nature of the program, then implement the reasonable accommodation request. See Liability Resource Manual* guideline, *ADM.09 Americans with Disabilities Act (ADA) & WA Law Against Discrimination (WLDA)*.
8. Safety protocols for sick children: Follow CDC and local and state health department guidelines on protocols for illness. Protocols may include not allowing children with a cough, fever, or other temporary medical contagious condition to attend and not return to the program until the child has been symptom free for at least 24 hours (monitor the CDC for changes or updates to this guidance). Parents must immediately remove children who exhibit symptoms while participating in the day-camp program, at the discretion of the program staff supervisor.
9. Food service, handling and consumption: Follow health department guidelines on food service. Requiring a parent to supply a child's lunch and snacks is recommended.

10. Dispensing medications to children: Members may provide a form to allow parents to voluntarily provide information on participants' medical conditions that require special consideration (e.g. serious food allergies). WCIA recommends that day-camp staff/volunteers generally do not dispense medications to children, except in emergency situations. Alternatives may be for the child to self-administer or allow the parent access to the child for that purpose. See Liability Resource Manual* guideline, *PAR.13 Medical Assistance for Participants*.
11. Parent/legal guardian assumption of the risks waiver and release: Once the policies, procedures and guidelines have been established for the day-camp program, the essential employees who qualify for the program should be given the documents and made aware of the expectations and risks of having a child participate in the program. The parent/legal guardian should be required to sign an assumption of the risk waiver and release document, agreeing to hold the employer harmless for the child's participation in the program. It is important that the rules and expectations of the program and each party's responsibilities are made clear to the parent/employee. See Liability Resource Manual* guideline, *PAR.23.01 Sample Parent/Legal Guardian Assumption of the Risk Waiver and Release*.

To assist our members, WCIA Risk Management Representatives will be available by email or phone during this health crisis to address any risk questions or concerns.

*The Liability Resource Manual is available through the Member Resources page on the WCIA website: <http://www.wciapool.org/member-resources>.