2011-2012 Environmental Health Preparedness Capabilities Project
IDPH has entered into a 5 year project period of CDC Public Health Emergency Preparedness Cooperative Agreement

Project period will focus on Public Health Preparedness Capabilities: National Standards for State and Local Planning

FY 11-12 Funding opportunity for EH

- Environmental Health Capabilities Project
Description of 15 capabilities and related functions, tasks, performance measures, and resources necessary for achieving each capability

Suggested activities for using the national standards to help public health departments organize work and identify most pressing needs
Focus on Capabilities Most Applicable to State and Local Public Health

- Public Health
- Public Health Emergency Preparedness
- Emergency Preparedness

HHS 10 Essential Public Health Services
State and Local Preparedness Capabilities
DHS National Preparedness Guidelines and Target Capabilities List
15 PREPAREDNESS CAPABILITIES

- Capability 1: Community Preparedness
- Capability 2: Community Recovery
- Capability 3: Emergency Operations Coordination
- Capability 4: Emergency Public Information and Warning
- Capability 5: Fatality Management
- Capability 6: Information Sharing
- Capability 7: Mass Care
- Capability 8: Medical Countermeasure Dispensing
- Capability 9: Medical Materiel Management and Distribution
- Capability 10: Medical Surge
- Capability 11: Non-Pharmaceutical Interventions
- Capability 12: Public Health Laboratory Testing
- Capability 13: Public Health Surveillance and Epidemiological Investigation
- Capability 14: Responder Safety and Health
- Capability 15: Volunteer Management
IDPH SELECTED CAPABILITIES 2011-2012

- Capability 2: Community Recovery
- Capability 3: Emergency Operations Coordination
- Capability 4: Emergency Public Information and Warning
- Capability 6: Information Sharing
- Capability 8: Medical Countermeasure Dispensing
- Capability 13: Public Health Surveillance and Epidemiological Investigation
Regional funding opportunity for FY 11-12

- $4333

Environmental Health Preparedness Capabilities Project Goal:

- Assess regional inventory of previously developed plans, tools, resources, etc to demonstrate that local environmental health has the necessary elements to achieve Public Health Preparedness National Standards
- Identify gaps that need to be addressed
Planning Template

- Establish a group leader
- Participant List
- Budget template
  - Budget for FY 11-12 $4,333

The group leader will submit the planning and budget template by the date due.
2011-2012 Environmental Health Preparedness Capabilities Project

- Two Capabilities are required for this project
- Capability templates will be provided
- Each Region will need to complete:
  - Capability 2: Community Recovery
- Community Recovery is the ability to collaborate with community partners, to plan and advocate for the rebuilding of environmental health systems to at least a level of functioning comparable to pre-incident levels, and improved levels where possible.
Each Region has their choice to complete **ONE** of the following Capabilities:

- Capability 3: Emergency Operations Coordination
- Capability 4: Emergency Public Information and Warning
- Capability 6: Information Sharing
- Capability 8: Medical Countermeasure Dispensing
- Capability 13: Public Health Surveillance and Epidemiological Investigation
Each Capability Template will include:

- Capability
- Capability Definition: defines the capability as it applies to state and environmental health
- Function Description: describes the critical elements that need to occur to achieve the capability
- Tasks: describes the steps that need to occur to complete the functions
  - Current regional status of function
  - Regional goal (build or sustain)
Resource elements: the resources a jurisdiction needs to have or have access to in order to successfully perform the function or tasks.

Three categories of resource elements:
- Planning
- Skills and Training
- Equipment and Technology

Planning is the only resource element tasked in this project.
2011-2012 Environmental Health Preparedness Capabilities Project

- All templates are stored in the Health Alert Network (HAN) Document Center
  - Environmental Health FY 11-12 Capabilities Project
  - Each Region has designated folder that includes:
    - Capabilities Planning Template
    - Budget Template
    - Capabilities Template
Regional Resources Folder

- Public Health Preparedness Capabilities: National Standards for State and Local Planning
- Capabilities 2, 3, 4, 6, 8, and 13
- List of county contacts for each region
PROJECT SUMMARY

- FY 11-12 Environmental Health Preparedness Capabilities Summary
  - Planning Template
  - Budget Template
  - Community Recovery Template
  - One Template from the following: Information Sharing; Emergency Operations Coordination; Emergency Public Information Warning; Medical Countermeasure Dispensing; or Public Health Surveillance and Epidemiological Investigation.

- Final products due June 29, 2012
Questions?

Contact Information:

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SWIMMING POOL PROGRAM UPDATES
Everyone has duties supporting other programs within EH, but the pool program receives the support from the following staff:

- John Kelly- Program Engineer-Construction Plan Review, Variances, New Pool Inspections, Review of Incidents, Rules Update, Rule interpretations, etc.
- Randy Lane - Pool Registrations-responding to questions or issues relating to initial registrations, renewals, change of owner, request for exemptions(Therapy/HOA), etc.
- Joyce Brown- Processing paperwork and payments for plans review, inspections, CPO training, Pool Registrations, etc.
- Debbie Cooper- Annual Pool Inspections (Boone and Keokuk County), assisting with rules update, may be assisting with development of training materials and tools to assist the operators (log sheets, checklists, etc).
- Heather Lloyd- Assisting with Rules Update and rule interpretation.
OVERVIEW

❖ Hot Topics
  ❖ Underwater Stairs
  ❖ VGB Drains
  ❖ ADA
  ❖ Accident Reports
  ❖ Variance Requests
  ❖ Rules Update
We have discovered that there are multiple pools in operation with non compliant sloping to the bottom of the pool in water less than 5 feet deep. The code limits the slope of the bottom of the pool to 1 ft vertical in 12 feet horizontal.

- Compliant stairs are used as entry/exit points to a pool, leading from the deck to the bottom of the pool. These do not effect the depth of the pool itself.

- Non-compliant stairs are not accessible from the deck, they begin underwater, transitioning the bottom of the pool from one depth to another depth. These create rapid changes in the depth of the swimming pool.
Underwater Steps
There are currently two issues relating to VGB Drains

- On 5/26/2011, the CPSC in cooperation with Eight Manufacturers issued a Drain Cover Recall
- On 9/28/11, the CPSC changed the definition of an unblockable drain.
- With the spring opening of the seasonal pools our inspections will check that the facilities are in compliance with both issues
VGB Drain Requirements

On 9/28/11, the CPSC’s voting commissioners decided to change the definition of an unblockable drain to require that the sump, in addition to the drain cover, measure more than 18 by 23 inches and meet certain other testing criteria. The decision is retroactive, so pools that were brought into VGBA compliance with the installation of an unblockable–sized cover over a single, blockable-sized drain will have to be split, supplemented with a secondary system, or otherwise treated like a single outlet.
The ADA is a federal civil law that is in effect and may apply to public swimming pools.

IDPH does not have any responsibility for direct enforcement or interpretation of the ADA.

As we work on our rules we may pull some language mirroring the ADA requirements into our rules if and where they fit with our mission of protecting the public health.
Reports. Swimming pool and spa operators shall report to the local inspection agency, within one business day of occurrence, all deaths; near drowning incidents; head, neck, and spinal cord injuries; and any injury which renders a person unconscious or requires immediate emergency medical services.

- All reportable incidents should be forwarded by the local inspection agency to the IDPH engineer.
- The local inspection agency should review reports and perform special inspections where necessary to report findings to IDPH.
Variance Request

There is a new form developed based on the requirements of the administrative code.

- A variance can only be granted if sufficient information is provided to substantiate the need and propriety of the action.

- Principal criteria are:
  - Substantially equal protection of health and safety thru other means
  - Does not pose a significant risk of injury and the cost to alleviate such a minor violation would require substantial and unreasonable expense.

- Three part approval process:
  - Recommendation of local inspection agency, recommendation of program engineer, recommendation and approval by the Division Director

- All decisions are issued in writing and shall include the reasons for denial or granting the variance. (Don’t assume anything has been approved, look for the written variance)
VARIANCE REQUEST

SWIMMING POOL VARIANCE REQUEST FORM

Return by mail to:
DIVISION OF ENVIRONMENTAL HEALTH
Iowa Department of Public Health
321 E 12th Street
Des Moines, IA 50319
phone: (515) 321-8722

DATE: ___________________________

FACILITY INFORMATION
Name: ____________________________
Address: __________________________
County: ____________________________

OWNER INFORMATION
Name: ____________________________
Address: __________________________

JUSTIFICATION
The following is in justification for variance of Iowa Administrative Code, Public Health 641 [Chapter 15]
Ruled: Substantial protection of health and safety shall be provided by means other than that prescribed in the particular rule by (attach additional sheets if necessary):

____________________________________________________________________________________

JUSTIFICATION – UNREASONABLE HARDSHIP
The following is to demonstrate how the degree of violation of the rule is sufficiently small so as not to pose a significant risk to an individual, and the remedies necessary to alleviate this minor violation would incur substantial and unreasonable expense on the part of the person seeking a variance. (attach additional sheets if necessary):

Estimated COST:

Duration of DISRUPTION resulting from Construction:

Date of Original Pool Construction:

Remaing Useful Life of the Swimming Pool:

Other Comments:

- I hereby certify that the information listed above is correct and accurate and that I am the owner or the owner’s authorized agent.

Signature:

Name & Title (Please print):

____________________________________________________________________________________
VARiance Request

INSPECTOR’S RECOMMENDATION
(Must be submitted to IDPH Swimming Pool Program within 15 business days of receipt)

Approval  Conditional Approval (see below)  Disapproval

Comments:

Inspector

SWIMMING POOL PROGRAM ENGINEER’S RECOMMENDATION

Approval  Conditional Approval (see below)  Disapproval

Comments:

Swimming Pool Program Engineer

ENVIRONMENTAL HEALTH DIVISION DIRECTOR DETERMINATION

Approval  Conditional Approval (see below)  Disapproval

Comments:

This variance is subject to periodic review and may be withdrawn by this office for just cause at any time. The granting of this variance shall NOT be considered as setting precedent. Each request for a variance shall be considered on its own merit.

Ken Sharp, Environmental Health Division Director

cc: Owner/Authorized Agent & Inspector

The applicant for a variance that is denied may request review of the denial by the director of the department. The request shall be submitted in writing within 30 days of the applicant’s receipt of the department’s denial of a variance request. The request for a review shall be addressed to the Iowa Department of Public Health, Office of the Director, Lucas State Office Building, 321 East 12th Street, Des Moines, Iowa 50319-0977. The decision of the director shall be considered the department’s final agency action.
Pool closing criteria will be consolidated into a single sections of the code and include all of the current closing criteria with the addition of the following criteria:

- A non-operational circulation pump, filter, or disinfectant feeder.
- Absence or non-availability of a certified operator or a person working under their direction that is knowledgeable in testing water and in operating the water treatment equipment.
- Failure to comply with the minimum lifeguard supervision required.
- The presence of a hazardous substance or object in the pool or the existence of any condition creating an immediate danger to health or safety, including fecal accident events.
Lifeguard staffing plan. The lifeguard/program staffing plan for the facility shall be available to the swimming pool inspector at the facility. The lifeguard staffing plan shall be reviewed with the facility staff annually. The lifeguard staffing plan for all programs conducted at the pool shall include the following:

- The square footage of the pool.
- The maximum and anticipated average patron load.
- The hours of operation.
- The location of each lifeguard station and each first aid station.
- The number of lifeguards or attendants on duty
- A diagram of the facility that indicates the placement of lifeguards and their area of responsibility, chairs, and stations for both average and maximum patron capacity. The diagram shall include each obstruction.
- A method of communication when 2 or more lifeguards are on duty.
The facility shall have a written fecal accident response plan. In responding to a fecal accident, the operator shall consider Centers for Disease Control guidelines for fecal accidents in pools used for swimming published by the federal centers for disease control and prevention.

The operator shall document each fecal contamination as follows:

- The date and time of the event and the free available chlorine and pH level at the time of the event and after the event, before re-opening the pool to the public.
- Whether the stool is formed or loose.
- The procedures followed in responding to the fecal contamination.
- The number of patrons in the pool and the length of time between the occurrence, detection, and resolution of the incident.
Underwater Benches shall:

- Be limited to the shallow water.
- Only be allowed at pools with lifeguard supervision unless a guardrail is provided.
- Be recessed into the pool wall so that there are no exposed corners or vertical edges in the pool.
- Not be more than 20 inches below the waterline, no more than 18 inches in depth, and not less than 24 inches in width.
- Have a slip resistant surface and be visually set apart from the surrounding pool surfaces with stripes at least 2 inches wide of a contrasting color marked on both the top and front edge.
- Have the words “Bench Below” in red letters at least 4 inches high spaced not more than 10 feet apart center to center within 3 feet of the edge of the swimming pool.
- Not be used as an entry or exit.
Construction tolerances. Construction tolerances may not exceed the applicable design dimensions beyond those designated in Table 2.

<table>
<thead>
<tr>
<th>Design Dimension</th>
<th>Construction Tolerance Permitted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water depth in areas greater than 5’ deep</td>
<td>+3”</td>
</tr>
<tr>
<td>Water depth in areas up to 5’ deep</td>
<td>+2”</td>
</tr>
<tr>
<td>Floor inlet protrusion</td>
<td>+1/8”</td>
</tr>
<tr>
<td>Stair treads and risers</td>
<td>+1/2”</td>
</tr>
<tr>
<td>Waterline for skimmer pools</td>
<td>+1/4”</td>
</tr>
<tr>
<td>Waterline for gutter and overflow trench pools</td>
<td>+1/8”</td>
</tr>
<tr>
<td>Wall variance from vertical</td>
<td>+3”</td>
</tr>
<tr>
<td>All dimensions not otherwise specified in this standard</td>
<td>+2”</td>
</tr>
</tbody>
</table>

*The construction tolerance for skimmer pool water depth is measured based on an operating water level at the centerline of the skimmer.

*The construction tolerance for skimmer pools is measured as the difference between skimmer vertical center lines.
We are working on language to require certain information to be posted at the pool.

Near Entrance
- Patron Load
- Current registration
- CPO certification
- Signage indicating inspection report available upon request

In Mechanical Room
- Pool Volume
- Minimum required recirculation rate
- VGB certifications indicating maximum certified flow
- The pump performance curve
Questions?

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