

Parks, Playgrounds, and Public Swimming and Bathing

Summer is here and the intent of the following article is to summarize the current guidance and requirements for our cities thinking about reopening their parks, playgrounds and public swimming and bathing facilities. The best source for information and guidance remains the state and the CDC so with this in mind, here are the links to the information we will be summarizing below:

Guidance for Park Administrators:

<https://www.cdc.gov/coronavirus/2019-ncov/community/parks-rec/park-administrators.html>

Guidance for Park Visitors

<https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/visitors.html>

Cleaning and Disinfecting Guidance:

<https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html>

Consideration for Aquatic Venues:

<https://www.cdc.gov/coronavirus/2019-ncov/community/parks-rec/aquatic-venues.html>

Kentucky Recreation and Parks Society website including Reopening Recommendations

<http://www.kyrps.org/>

Healthy at Work – Public Swimming and Bathing Facilities – Effective June 29, 2020:

https://govsite-assets.s3.amazonaws.com/a7tVDnvvQbahIK3dalps_2020-6-18%20-%20HaW%20-%20Swimming%20and%20Bathing%20Reqs%20-%20DRAFT%201.2.pdf

City Parks and Playgrounds

For city parks and related facilities, the CDC has issued the following guidelines for park administrators. Signage should be considered throughout the park to remind visitors to take steps to prevent the spread of COVID-19 including information such as:

- Staying home [if you are sick](#) or do not feel well, and what to do if you are sick or feel ill.
- Using [social distancing](#) to maintain a distance of 6 feet between others in all areas of the park.
- [Covering coughs and sneezes](#) with a tissue or the inside of the elbow. Used tissues should be thrown into the trash.
- [Washing hands](#) often with soap and water for at least 20 seconds, especially after going to the bathroom, before eating, and after blowing your nose, coughing, or sneezing.
 - If soap and water are not readily available, use hand sanitizer that contains at least 60% alcohol and rub hand together until dry.
 - Young children should be supervised to ensure they are using sanitizer safely.
- Avoiding touching eyes, nose, and mouth with unwashed hands.

- Using [cloth face coverings](#) as feasible. Face coverings are **most** essential in times when social distancing is difficult. Cloth face coverings should not be placed on:
 - Children younger than 2 years old
 - Anyone who has trouble breathing
 - Anyone who is unconscious, incapacitated or otherwise unable to remove the cloth face covering without assistance

The CDC also recommends opening restrooms if the park is open for public visitation. If the park is opening without opening restrooms, visitors should be notified in advance so that they may prepare accordingly.

Open restrooms should abide by the following guidelines:

If possible, restrooms should be open if a park is open for public visitation with signage as to the cleaning schedule. If the restrooms will be closed, notify visitors ahead of time so they can prepare appropriately. Ensure that open restrooms are:

- Operating with functional toilets.
- [Cleaned and disinfected](#) regularly, particularly high-touch surfaces such as faucets, toilets, doorknobs, and light switches.
- Clean, and disinfect restrooms daily or more often if possible using EPA-registered disinfectants that are effective against SARS-CoV-2, the virus that causes COVID-19.
- Following the [Guidance for Cleaning and Disinfecting](#) to develop, implement, and maintain a plan to perform regular cleanings to reduce the risk of exposure to COVID-19.
- Regularly stocked with supplies for handwashing, including soap and paper towels for drying hands or hand sanitizer with at least 60% alcohol and no touch trash cans.
- In addition, advise employees to always wear gloves appropriate for the chemicals being used when they are cleaning and disinfecting, and that they may need additional PPE based on the setting and product. Employees should follow the directions on the label of the products. Ensure that cleaning products are stored properly and kept away from children.

If your restrooms do not have running water (portable toilets, etc.) and are not stocked with hand hygiene products, visitors should be encouraged to bring their own hand sanitizer with at least 60% alcohol for use.

If the city opts to open playgrounds, these are high-touch surface areas and the park staff's ability to clean and sanitize the equipment is difficult. In fact, CDC guidance expressly states that playgrounds are hard to keep safe because:

- They are often crowded and could make social distancing difficult;
- It can be difficult to keep surfaces clean and disinfected;
- SARS-CoV-2, the virus that causes COVID-19, can spread when young children touch contaminated objects, and then touch their eyes, nose, or mouth.

Additionally, the CDC notes parks intending to open playgrounds should:

- Consult with public health officials and refer to state and local regulations regarding the appropriate timing of re-opening playgrounds.
- Outdoor areas generally require normal routine cleaning and do not require disinfection. Spraying disinfectant on sidewalks and in parks is not an efficient use of disinfectant supplies and has not been proven to reduce the risk of COVID-19 to the public. You should continue utilizing existing cleaning and hygiene practices for outdoor areas.
- The targeted use of disinfectants can be done effectively, efficiently, and safely on outdoor hard surfaces and objects frequently touched by multiple people (e.g., handrails, benches); make sure disinfectant has thoroughly dried before allowing children to play.
- Ensure safe and correct use and storage of disinfectants, including storing products securely away from children.

CDC guidance for park visitors include recommendations to:

- Maintain a distance of at least 6 feet away from people you do not live with.
- Wash hands with soap and water for at least 20 seconds.
 - Adults and older children who can safely use hand sanitizer: use hand sanitizer that contains at least 60% alcohol and rub hands together until dry, if soap and water are not readily available.
- Wear a cloth face covering, if you can. Cloth face coverings should not be placed on:
 - Children under age two;
 - Anyone who has trouble breathing;
 - Anyone who is unconscious, cannot move, or is otherwise unable to remove the cloth face covering without assistance.

Swimming and Bathing Centers

In Kentucky, public swimming and bathing centers are subject to Healthy at Work requirements which can be found at https://govsite-assets.s3.amazonaws.com/a7tVDnvvQbahIK3dalps_2020-6-18%20-%20HaW%20-%20Swimming%20and%20Bathing%20Reqs%20-%20DRAFT%201.2.pdf as noted above.

The Healthy at Work Requirements for Public Swimming and Bathing Facilities shall apply to facilities defined under 902 KAR 10:120, Section 2(46).

The regulation states: "Public swimming and bathing facilities" or "facility" means any natural or artificial body or basin of water which is modified, improved, constructed, or installed for the purpose of public swimming or bathing under the control of any person and includes, but is not limited to, the following:

- (a) Beaches;
- (b) Swimming pools, wading pools, wave pools;
- (c) Competition swimming pools and diving pools;

(d) Water slides and spray pools; and

(e) Spas, therapeutic pools, hydrotherapy pools, and whirlpools.

It includes those operated by communities, subdivisions, apartment complexes, condominiums, clubs, camps, schools, institutions, parks, mobile home parks, hotels, recreational areas, or similar public facilities. It does not include any of the above facilities which are at private single-family residences intended only for the use of the owner and guests.

Pools must be current on licensing fees and receive opening inspections from their local health department prior to reopening. The facilities shall continue to comply with 902 KAR 10:120 requirements. If the facility serves food or concessions, it will need to follow Healthy at Work Restaurant Requirements.

The facility must determine its maximum bather load while enforcing six-foot social distancing calculated at 36 square feet per person.

Public swimming and bathing facilities must:

- Eliminate use of saunas and steam rooms;
- Eliminate the use of any waiting areas;
- Ensure visitors do not congregate in or around the premises;
- Modify traffic flow, to the greatest extent practicable, to minimize contacts between employees and visitors;
- Prohibit gatherings or meetings of employees of 50 or more during work hours; and
- Permit employees to take breaks and lunch outside, in their office or personal workspace, or in such other areas where proper social distancing is attainable.

Public swimming and bathing facilities should:

- Provide services and conduct business via phone or Internet to the greatest extent practicable;
- Ensure employees use digital files rather than paper formats (e.g., documentation, invoices, inspections, forms, agendas) to the greatest extent practicable;
- Communicate with clients and receive payments through contactless payment options (e.g., phone or Internet), to the greatest extent practicable;
- Ensure any employees able to perform their job duties via telework (e.g., accounting staff) to continue to telework;
- Discourage employees from sharing phones, desks, workstations, handhelds/wearables, or other work tools and equipment to the greatest extent practicable; and
- Install floor or wall decals for cashier and other queuing areas to demark safe waiting distances of a six feet minimums.

As to cleaning and disinfecting public swimming and bathing facilities must:

- Ensure their facilities, including locker rooms, common areas, breakrooms and restrooms are properly and frequently cleaned and ventilated;

- Ensure cleaning and sanitation of frequently touched surfaces (i.e., fitting rooms, doors, PIN pads, and common areas) with appropriate disinfectants such as EPA registered household disinfectants, diluted household bleach solution, and alcohol solutions containing at least 60% alcohol;
- Provide hand sanitizer, handwashing facilities, tissues and waste baskets in convenient locations to the greatest extent practicable;
- Encourage visitors to properly wash their hands when they arrive at the facility; and
- Establish a cleaning and disinfecting process that follows CDC guidelines when any individual is identified, suspected, or confirmed COVID-19 case.

As to cleaning and disinfecting public swimming and bathing facilities should:

- Ensure disinfecting wipes or other disinfectants are available at shared equipment;
- Advise swimmers to not share towels or equipment that has not been properly disinfected;
- Encourage patrons to bring their own seating to reduce use of communal seating;
- Frequently sanitize any chair or other shared furniture or objects;
- Require patrons to arrive in their swim attire to reserve use of the facilities for restroom purposes only; and
- Only permit patrons to shower at the facility if it can routinely and adequately clean and sanitize the showers and locker rooms on a frequent basis.

Ensure any retail items or products that are touched by visitors but not purchased are set aside and appropriately cleaned prior to returning to sales shelves. Businesses should refer to CDC cleaning guidelines for guidance (<https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html>).

As to personal protective equipment, public swimming and bathing facilities must:

- Ensure appropriate face coverings and other personal protective equipment (PPE) are used by employees whenever social distancing of less than 6 feet may be compromised so long as such use does not jeopardize the employees' health or safety.
 - Lifeguards shall NOT wear masks while on duty as it is a safety hazard;
- Ensure their employees wear face masks for any interactions between visitors and co-workers or while in common travel areas of the business (e.g., aisles, hallways, stock rooms, breakrooms, bathrooms, entries and exits). Employees are not required to wear face masks while alone in personal offices or if doing so would pose a serious threat to their health or safety.

As to training and safety, public swimming and bathing facilities must place conspicuous signage at entrances and throughout the facility alerting staff and customers to the required occupancy limits, six feet of physical distance, policy on face coverings and good hygiene practices.

Public swimming and bathing facilities should, to the greatest extent practicable, implement hours where service can be safely provided to clients at higher risk for severe illness per CDC guidelines.

Conclusion

All of the guidance and recommendations as to parks, playgrounds, and pools are subject to change and it is a very safe assumption that they will be changing as we go forward in this pandemic. KLC will continue to keep our cities informed as these changes occur and cities should frequently consult <https://kycovid19.ky.gov> and <https://www.cdc.gov> for the most current guidance and requirements.