

A close-up photograph of a person's hands holding a clipboard and writing with a red pen. The background is a blurred blue sky with white clouds. The text 'QUALIFIED SWIM INSTRUCTOR INTERIM GUIDANCE' is overlaid in large, white, bold, sans-serif capital letters.

QUALIFIED SWIM INSTRUCTOR INTERIM GUIDANCE

Background

In Fall of 2024, The Council for the Model Aquatic Health Code (CMAHC) received a request for assistance from various Public Health officials in response to the growth of Learn-to-Swim (LTS) legislation proposed by Every Child A Swimmer. Of particular concern was how LTS training agencies and providers could be verified as being a quality agency.

In early Spring 2025, CMAHC assembled an Ad Hoc Committee to develop first ever guidance on the essential elements of an LTS Instructor certification. Chaired by Lindsay Mondick and co-chaired by Connie Harvey, this Ad Hoc committee is composed of representatives from The YMCA of the USA (YUSA), The American Red Cross (ARC), Starfish Aquatics Institute (SAI), the United States Swim School Association (USSSA), Swim Angelfish, Jeff Ellis Swimming, and Prince George County (MD) Parks and Recreation.

This interim guidance represents the cumulation of the work of the Qualified Swim Instructor Ad Hoc Committee and represents the first national guidance in the United States with regards to training qualified swim instructors.

Intent, Comment Period, and Next Steps

The intent of this document is to create interim guidance for the training of qualified swim instructors. This interim guidance will be published by CMAHC with the intent of being submitted for inclusion in the 6th Edition of the Centers for Disease Control and Prevention (CDC) Model Aquatic Health Code (MAHC).

This draft is being released as part of a 30-day comment period. CMAHC will solicit stakeholder feedback during this period. Comments may be submitted to cmahc@cmahc.org. Please note that CMAHC will not respond directly to any submitted comments. The comments collected will be reviewed by the Qualified Swim Instructor Ad Hoc committee for consideration towards the publication of the interim guidance document.

After the Qualified Swim Instructor Ad Hoc committee has completed the final draft of this guidance document, the published version will be shared with public health officials, training agencies, and hosted for public viewing on www.cmahc.org. The Qualified Swim Instructor Ad Hoc committee will then prepare a Change Request to be submitted for the 6th Edition MAHC at the next revision cycle.

About this Interim Guidance

The Qualified Swim Instructor Interim Guidance has been written in MAHC-compliant language. The formatting largely follows the MAHC with slight exceptions to enhance readability. There are three sections of this guidance document: Glossary of Terms, Code Language, and Annex Language. Please note that all numbering is for placeholder purposes only.

The final numbering and formatting will be determined when submitted as a Change Request for the 6th Edition MAHC.

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A Quick Note

When reading this guidance, please note that headings and subheadings are repeated when content continues onto the next page. This was done to ensure precision and clarity, but may be confusing to some readers.

Section 1.0: Glossary of Abbreviations and Glossary of Terms

“EMS” Emergency Medical Services

“CERTIFICATION” means a formal, time-limited recognition granted by an AHJ-recognized authorized training agency indicating that an individual has successfully completed all required instruction, demonstrated the prescribed knowledge and skills, and met the competency standards established for a specific aquatic role or function.

“Authorized Training Agency or Training Provider” means an organization, aquatic facility, employing organization, or instructional program that develops, delivers, administers, or oversees aquatic training, evaluation, or competency verification that is recognized by the AHJ.

“Qualified Swim Instructor” means an individual who has successfully completed an AHJ-recognized qualified swim instructor training course offered by an AHJ-recognized authorized training agency, holds a current certificate for such training, has met the pre-service requirements, and is participating in continuing in-service training requirements of the aquatic facility.

“Qualified Swim Instructor Trainer” means an individual who holds a current instructor trainer level certification by the authorized training agency to conduct qualified swim instructor training and evaluate instructor candidates and instructor competencies

“Competency” means the demonstrable and consistent ability of personnel to apply the role-specific knowledge, skills, behaviors, and judgment necessary to safely and effectively perform assigned responsibilities

“Water Competency” means being able to anticipate, avoid, and survive common drowning situations, as well as being able to recognize and provide assistance to those in need. It includes water safety awareness, basic swimming skills, and helping others.

“Instructional Environment” means the aquatic setting, participant population, water depth, activity type, and operational conditions in which swim instruction occurs.

“Participant Supervision” Active observation and management of participants appropriate to the instructional activity, participant abilities, and aquatic environment.

“Swim Program” means a structured and supervised aquatic program that provides instruction, practice, or training in water safety, swimming skills, or aquatic activities, delivered by qualified swim instructor and designed to promote water competency, safety, and participant progression appropriate to age, ability, and environment.

Section 2.0: Code Language

8.0 Swim Instructor Training

8.0.1 Swim Instructor Qualifications

A QUALIFIED SWIM INSTRUCTOR shall:

1. Be at least 15 years of age,
2. Have successfully completed an AHJ-recognized QUALIFIED SWIM INSTRUCTOR training course offered by an AHJ-recognized AUTHORIZED TRAINING AGENCY,
3. Possess a current CERTIFICATION for such training,
4. Possess unexpired CPR/AED and First Aid certificates per MAHC 6.2.1.1.3 and 6.2.1.1.4,
5. Have met all pre-service requirements, including evaluation of physical swimming COMPETENCY and knowledge of AHJ recognized course curriculum,
6. Participate in regular and frequent, documented in-service training as required by the AQUATIC FACILITY or AHJ,
7. Have passed/cleared a criminal background check, if over 18, and completed training in child abuse prevention, including recognizing and responding to signs of abuse, mandated reporting requirements, and prevention of inappropriate conduct (e.g. grooming behaviors), and
8. Hold current professional-level CERTIFICATION in CPR/AED and First Aid for infants, children and adults that follow treatment protocols consistent with the current with ILCOR and/or OSHA guidelines.

8.0.1.1 Course Content

Training courses to become a QUALIFIED SWIM INSTRUCTOR shall include, but not be limited to the following components:

1. Physical COMPETENCY and swimming skills proficiency check
2. Hazard identification and injury prevention
3. Emergencies
4. Basic swimming knowledge
5. Swimming curriculum components
6. Instructional techniques
7. Specialty and adaptive techniques
8. Professional ethics
9. Performance evaluation

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.1 Swim Instructor Qualifications

8.0.1.1 Course Content

8.0.1.1.1 Physical Competency and Swimming Skills Proficiency Check

Physical COMPETENCY and swimming skills proficiency in skills that the QUALIFIED SWIM INSTRUCTOR is responsible for teaching. At minimum, this includes the swimming skills of WATER COMPETENCY, which is this combination of skills:

1. Jump into water over their head, then return to the surface.
2. Float or tread water for at least 1 minute.
3. Turn over and turn around in the water.
4. Swim at least 25 yards.
5. Exit the water without using a ladder.

8.0.1.1.1.1 Intermediate and Higher

If teaching intermediate and higher levels of swimming, this may also include demonstrations of the following:

1. Swimming strokes, including strokes for recreation, fitness, survival and competition (i.e., freestyle/front crawl, backstroke/back crawl, sidestroke, elementary backstroke, breaststroke and/or butterfly).
2. Entries, starts and turns.
3. Other skills specific to the stage or level of instruction being taught.

8.0.1.1.2 Hazard Identification and injury prevention

Hazard identification and injury prevention, including how to:

1. Identify common hazards or causes of injuries and their prevention.
2. Implement prevention strategies during swim lessons.
3. Recognize the signs of drowning and how to react in an emergency.
4. Prevent voluntary hyperventilation and extended breath-holding activities.
5. Prevent RWIs and other health and safety issues related to swim instruction.

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.1 Swim Instructor Qualifications

8.0.1.1 Course Content

8.0.1.1.3 Emergencies

Emergency response skill set which shall include:

1. Knowledge of the responsibilities of a QUALIFIED SWIM INSTRUCTOR during an emergency that includes:
2. Recognition and identification of a person in distress or drowning.
3. Methods for activating the facility's emergency response procedures.
4. Emergency communication procedures.
5. Safe PARTICIPANT SUPERVISION and class control during an emergency.
6. How to perform a reaching assist, extension assist and throwing assist to get a person to safety.
7. How to evacuate the pool area safely.
8. Rescue skills to assist a QUALIFIED LIFEGUARD or others in helping a person who is in distress or drowning, including:
 - a. Use of rescue equipment.
 - b. Skills required to assist a QUALIFIED LIFEGUARD in the extrication of a person from the water.
 - c. Transfer of care to QUALIFIED LIFEGUARDS or EMS.

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.1 Swim Instructor Qualifications

8.0.1.1 Course Content

8.0.1.1.4 Basic Swimming Knowledge

Basic swimming knowledge skill set that is based on the program focus the QUALIFIED SWIM INSTRUCTOR will be teaching. This shall include, at a minimum:

1. Swimming terminology and hydrodynamics, including common swimming terms and their application (e.g., buoyancy, drag, kick, stroke cycle) as well as basic understanding of how the body moves through water and how to reduce resistance.
2. SWIM PROGRAMS teaching children and non-swimmers should focus on the foundational components of WATER COMPETENCY, which includes:
 - a. Water-safety awareness: Understanding water rules, safe behaviors, and respect for aquatic environments.
 - b. Instruction and mastery of basic swimming skills:
 - i. Safely enter the water (jump into the water) and resurface
 - ii. Turn around
 - iii. Floating/treading at least 1 minute
 - iv. Propulsion (at least 25 yards), and
 - v. Exit the water
 - c. Recognition and response: Teaching students how to understand if they are in trouble in the water, to recognize if someone else is in trouble, and how to call for or seek help appropriately.
 - i. Practice swimming in varied conditions (e.g., with clothes, in life jackets, after a simulated fall-in).
 - ii. Knowing how to shout for help.
 - iii. Understanding how to get to a position of safety (e.g., floating or treading water or moving to the wall and holding on until help arrive).
 - iv. Practicing reaching or throwing assists to help someone else in trouble in the water.
 - v. Adaptation to different environments (pools, open water) as appropriate to the program scope.
3. SWIM PROGRAMS teaching children and adults intermediate and higher-level of swimming skills, including but not limited to:
 - a. Understanding and being able to teach the different types of swimming strokes based on the program's focus, which could include strokes for recreation, fitness, survival or competition (i.e., front crawl/freestyle, elementary backstroke, back crawl, sidestroke, breaststroke, and butterfly) and their basic techniques, including breathing techniques and patterns for each stroke.
 - b. Skills needed for other aquatic activities and sports, such as entries, starts, and turns for fitness or competitive swimming;

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.1 Swim Instructor Qualifications

8.0.1.1 Course Content

8.0.1.1.5 Swimming Curriculum Components

Curriculum familiarity training that includes instruction on:

1. Curriculum and skill progressions throughout all ages and stages of swimming lessons.
2. Lesson and lesson planning resources.
3. Program skill progressions and how it supports age and skill appropriate lessons.

8.0.1.1.6 Instructional Techniques

Training in the following instructional techniques skill set:

1. Understand developmental readiness and individual learning differences, including the ability to apply adaptive strategies for varied cognitive, physical, sensory, behavioral, communication, or emotional needs.
2. Provide progressive, developmentally appropriate instruction, using stepwise skill progressions and scaffolding suitable for all ages and ability levels.
3. Plan and deliver structured, goal-oriented lessons, adjusting content, pacing, and teaching methods to meet the needs of diverse learners.
4. Build water comfort and confidence through safe, gradual, and supportive introduction to aquatic environments.
5. Communicate clearly and positively, offering constructive feedback, motivation, and age-appropriate explanations.
6. Maintain an effective learning environment through appropriate behavior-management and participant-engagement techniques.
7. Assess participant skills and progress using consistent, objective criteria aligned with the instructional curriculum, maintain records appropriate to the program, and apply standardized methods for evaluating participant readiness and skill progression.

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.1 Swim Instructor Qualifications

8.0.1.1 Course Content

8.0.1.1.7 Specialized and Adaptive Program Techniques

Training shall include instructional techniques and competencies that ensure QUALIFIED SWIM INSTRUCTORS are able to:

1. Understand developmental readiness, individual learning differences, and special considerations, including the ability to recognize and appropriately accommodate varied cognitive, physical, sensory, behavioral, communication, emotional, and medical needs of individuals with disabilities and special needs.
2. Apply adaptive and inclusive teaching strategies to support meaningful participation, skill acquisition, safety, and success for swimmers of all ages, abilities, and support needs.
3. Provide progressive, developmentally appropriate instruction using stepwise skill progressions, individualized support techniques, and scaffolding techniques suited to diverse learners and varying functional abilities.
4. Plan and deliver structured, goal-oriented lessons while adjusting instructional content, pacing, communication methods, environmental factors, and teaching approaches to meet the individualized needs of participants.
5. Build water comfort, confidence, trust, and participation through safe, gradual, supportive, and sensory-considerate introduction to aquatic environments.
6. Communicate clearly, respectfully, and positively with participants, caregivers, and support persons, using constructive feedback, motivational strategies, and age- and ability-appropriate instruction.
7. Maintain a safe, inclusive, and effective learning environment through appropriate behavior-support, participant-engagement, and risk-management techniques.
8. Assess swimmer skills, participation, safety awareness, and progress; document required records; and evaluate and refine instructional practices to improve outcomes and accessibility for all participants.

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.1 Swim Instructor Qualifications

8.0.1.1 Course Content

8.0.1.1.8 Professional and Ethics Training

Professionalism and ethics training shall include:

1. Code of Ethics: Upholding ethical behavior, maintaining professionalism, including in interactions with children and their parents/caregivers, and setting a positive example for swimmers.
2. QUALIFIED SWIM INSTRUCTOR Expectations: Adhering to safety regulations, facility rules, and continuing education requirements.

8.0.1.1.9 Teaching Performance Evaluation

QUALIFIED SWIM INSTRUCTOR candidates shall complete a teaching performance evaluation demonstrating the ability to deliver instruction, manage participant safety, and apply instructional methodology.

8.0.1.2 Swim Instructor Training Delivery

8.0.1.2.1 Standardized and Comprehensive

QUALIFIED SWIM INSTRUCTOR training shall utilize standardized student and instructor materials to include all topics including but not limited to those listed per MAHC 8.0.1.1

8.0.1.2.2 Cognitive and knowledge components

QUALIFIED SWIM INSTRUCTOR courses shall be delivered through in-person, online or blended instructional delivery. Cognitive and knowledge components may be delivered online if:

1. Student identity is verified via proctored online or in-person examination.
2. Evaluation procedures verify mastery of required knowledge and skills.
3. Documentation of successful completion is retained according to training-agency policies.

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.1 Swim Instructor Qualifications

8.0.1.2 Swim Instructor Training Delivery

8.0.1.2.3 Skills Practice

Physical training of QUALIFIED SWIM INSTRUCTOR skills shall include in-water and out of water skill practice lead by an individual currently certified as a QUALIFIED SWIM INSTRUCTOR trainer by the AUTHORIZED TRAINING AGENCY which developed the QUALIFIED SWIM INSTRUCTOR course materials.

8.0.1.2.4 Sufficient Time

Course length shall provide sufficient time to teach content, practice skills, and evaluate competencies identified in MAHC 8.0.1.1.

8.0.1.2.5 Swim Instructor Trainers

QUALIFIED SWIM INSTRUCTOR courses shall be conducted only by a QUALIFIED SWIM INSTRUCTOR TRAINER certified by the agency that developed the curriculum and QUALIFIED SWIM INSTRUCTOR course materials.

8.0.1.2.5.1 Minimum Prerequisites

The AUTHORIZED TRAINING AGENCY shall establish minimum prerequisites consistent with the knowledge and skills outlined in MAHC 8.0.1 and 8.0.1.1

8.0.1.2.5.2 Completed Swim Instructor Trainer Preparation

Before leading QUALIFIED SWIM INSTRUCTOR training, the QUALIFIED SWIM INSTRUCTOR TRAINER shall complete:

1. A QUALIFIED SWIM INSTRUCTOR course from the AUTHORIZED TRAINING AGENCY; and
2. A QUALIFIED SWIM INSTRUCTOR TRAINER level program that includes:
 - a. Mastery of course content
 - b. Demonstrated instructional delivery ability
 - c. Instructor candidate evaluation
 - d. Presentation-skills evaluation and feedback
 - e. Course administration and management
 - f. Testing and evaluation procedures

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.1 Swim Instructor Qualifications

8.0.1.2 Swim Instructor Training Delivery

8.0.1.2.5 Swim Instructor Trainers

8.0.1.2.6.3 Swim Instructor Renewal / Recertification

The AUTHORIZED TRAINING AGENCY shall maintain a renewal or recertification process for the QUALIFIED SWIM INSTRUCTOR.

8.0.1.2.6.4 Swim Instructor Trainer Renewal / Recertification

Training agencies shall maintain a renewal or recertification process for the QUALIFIED SWIM INSTRUCTOR TRAINER.

8.0.1.2.6.5 Quality Control

The AUTHORIZED TRAINING AGENCY shall maintain a quality-control system for evaluating QUALIFIED SWIM INSTRUCTOR TRAINER performance.

8.0.1.2.7 Training Equipment

All QUALIFIED SWIM INSTRUCTOR training courses shall have the following equipment or resources available in safe and functional condition and appropriate student-to-equipment ratios during the course:

1. AUTHORIZED TRAINING AGENCY curriculum resources
2. Instructional teaching aids
3. Aquatic instructional equipment
4. Rescue and safety equipment
5. WATER COMPETENCY and skill assessment tools
6. Administrative and documentation materials

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.1 Swim Instructor Qualifications

8.0.1.3 Competency and Certification

8.0.1.3.1 Proficiency

QUALIFIED SWIM INSTRUCTOR skills per MAHC 8.0.1.1 shall be tested by a QUALIFIED SWIM INSTRUCTOR TRAINER to a level of proficiency accepted by the AUTHORIZED TRAINING AGENCY.

8.0.1.3.2 Trainer Physically Present

The QUALIFIED SWIM INSTRUCTOR TRAINER of record shall be physically present at all classroom and in-person contact time, skills evaluation, and testing during the course.

8.0.1.3.3 Certification

QUALIFIED SWIM INSTRUCTOR and QUALIFIED SWIM INSTRUCTOR TRAINER CERTIFICATIONS shall be issued to recognize successful completion of the course as per the requirements of MAHC 8.01.

8.0.1.3.4 Number of Years

Length of valid CERTIFICATION shall be a maximum of 2 years for QUALIFIED SWIM INSTRUCTOR.

8.0.1.3.5 Documentation Retention

The AUTHORIZED TRAINING AGENCY shall maintain documentation sufficient to verify QUALIFIED SWIM INSTRUCTOR and QUALIFIED SWIM INSTRUCTOR TRAINER candidate identity, instructor training completion, and CERTIFICATION records according to organizational policy. Course documentation shall include the following:

1. Name of trainee
2. Level of training
3. Expiration date
4. Identifier of QUALIFIED SWIM INSTRUCTOR TRAINER of record
5. Any restrictions that may be applied by AUTHORIZED TRAINING AGENCY, and
6. Identifier of the AUTHORIZED TRAINING AGENCY providing CERTIFICATION

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.1 Swim Instructor Qualifications

8.0.1.3 Competency and Certification

8.0.1.3.6 Expired Certificate

When a CERTIFICATION has expired for more than 45 days, the QUALIFIED SWIM INSTRUCTOR shall retake the course

8.0.1.3.6.1 Expired Less than 45 Days

When a certificate has expired for more than 45 days or less, the QUALIFIED SWIM INSTRUCTOR shall retake the course or complete a challenge program

8.0.1.3.7 Challenge Program

A QUALIFIED SWIM INSTRUCTOR challenge program, when utilized, shall be completed in accordance with the training of the original AUTHORIZED TRAINING AGENCY, by a QUALIFIED SWIM INSTRUCTOR TRAINER certified by the original AUTHORIZED TRAINING AGENCY, and include but not be limited to:

1. Pre-requisite screening;
2. A final practical evaluation, with certified trainer present, demonstrating all skills, in and out of the water required in the original QUALIFIED SWIM INSTRUCTOR course for CERTIFICATION, which complies with MAHC 8.0.1.

8.0.1.3.8 Swim Instructor and Swim Instructor Trainer Renewal, Suspension, and Revocation

SWIM PROGRAMS shall establish processes for renewal, continuing education, and suspension or revocation of QUALIFIED SWIM INSTRUCTOR and QUALIFIED SWIM INSTRUCTOR TRAINER authorization.

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.1 Swim Instructor Qualifications

8.0.1.3 Competency and Certification

8.0.1.3.8 Swim Instructor and Swim Instructor Trainer Renewal, Suspension, and Revocation

8.0.1.3.8.1 Certificate Renewal

Certificate renewal, when used, shall include the following:

1. Completion no later than 45 days after certificate expiration;
2. Conducted in accordance with the training of the original certifying agency;
3. Taught by a trainer certified by the original certifying agency;
4. Conducted with a demonstration of skills, in and out of the water, required in the original course, which complies with MAHC 8.0.1;
5. A final practical exam with a certified trainer(s) of record present and actively administering the practical testing; or
6. Completion of a Challenge Program in accordance with MAHC 8.0.1.2.5.2, no later than 45 days after certificate expiration.

8.0.1.3.8.2 Curriculum Review and Update

The AUTHORIZED TRAINING AGENCY shall review and update QUALIFIED SWIM INSTRUCTOR and QUALIFIED SWIM INSTRUCTOR TRAINER course curricula as appropriate to align with current MAHC standards and evidence-based practices.

8.0.1.3.8.3 Candidate Remediation

AUTHORIZED TRAINING AGENCY shall provide procedures for remediation, retraining, or reevaluation of candidates who do not demonstrate the competencies needed to complete the training.

8.0.1.3.8.4 Certificate Suspension and Revocation

The AUTHORIZED TRAINING AGENCY shall have procedures in place for the suspension or revocation of certificates.

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.2 Aquatic Facility Requirements for Swimming Instruction Swim Programs

8.0.2.1 Lifeguard Requirement for Instructional Swim Programs

AQUATIC FACILITIES offering group swimming instruction SWIM PROGRAMS shall comply with the QUALIFIED LIFEGUARD deployment requirements outlined in MAHC 6.3.2 and 6.3.2.1.

8.0.2.1.1 Lifeguard Staffing

The presence of QUALIFIED SWIM INSTRUCTORS shall not replace or reduce required QUALIFIED LIFEGUARD staffing levels.

8.0.2.2 Swim Lessons and Safety-Related Equipment

8.0.2.2.1 Identifying Uniform

QUALIFIED SWIM INSTRUCTORS shall be clearly identifiable as instructional staff of the AQUATIC FACILITY.

8.0.2.2.2 Required Communication, First Aid, and Rescue Equipment

AQUATIC FACILITIES offering swimming instruction SWIM PROGRAMS shall comply with the following MAHC equipment requirements:

1. Communication equipment as required by MAHC 5.8.5.2.1
2. First aid supplies as required by MAHC 5.8.5.2.2
3. Rescue equipment as required by MAHC 5.8.5.3.2.1 and MAHC 5.8.5.3.3

8.0.2.2.3 Reaching Pole

AQUATIC FACILITIES with one QUALIFIED LIFEGUARD present during instruction shall provide and maintain a reaching pole meeting the specifications of MAHC 5.8.5.4.2.

8.0.2.2.4 Sun-Blocking Methods for Outdoor Instruction

AQUATIC FACILITIES where QUALIFIED SWIM INSTRUCTORS may be exposed to UV radiation shall train instructional staff on the use of:

1. Protective clothing
2. Hats
3. Sun-blocking umbrellas
4. Sunscreen meeting or exceeding SPF 15

8.0.2.2.4.1 Training

Training shall include risks associated with using or not using protective measures.

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.2 Aquatic Facility Requirements for Swimming Instruction Swim Programs

8.0.2.3 Safety Plan Requirements for Instructional Swim Programs

8.0.2.3.1 Safety Plan

The AQUATIC FACILITY'S SAFETY PLAN, as required in MAHC 6.0, shall address swimming instruction SWIM PROGRAMS.

8.0.2.3.1.1 Safety Plan Instructional Activities Components

The AQUATIC FACILITY SAFETY PLAN shall identify risks specific to instructional activities, including:

1. Mixed swimming abilities
2. Instructor in-water engagement and class ratios
3. Class transition periods
4. Use of platforms or teaching aids
5. Deep-water instruction for non-swimmers

8.0.2.3.1.2 Safety Plan Hazard Mitigation Strategies Components

The AQUATIC FACILITY SAFETY PLAN shall include hazard mitigation strategies and clearly defined responsibilities for QUALIFIED LIFEGUARDS and QUALIFIED SWIM INSTRUCTORS.

8.0.2.4 Facility Specific Training

8.0.2.4.1 Emergency Action Plan Training for Swim Instructors

QUALIFIED SWIM INSTRUCTORS shall receive training on the AQUATIC FACILITY EAP consistent with MAHC 6.3.5.1 and 6.3.5.2. EAP training shall be completed prior to independent teaching and at least annually or whenever procedures change.

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.2 Aquatic Facility Requirements for Swimming Instruction Swim Programs

8.0.2.4 Facility Specific Training

8.0.2.4.2 Pre-service Training For Swim Instructors

QUALIFIED SWIM INSTRUCTORS shall complete pre-service training specific to the AQUATIC FACILITY prior to independently conducting swimming instruction.

Pre-service training shall include, at a minimum:

1. Facility orientation which reviews the AQUATIC FACILITY layout, including water depths, entry and exit points, emergency equipment locations, evacuation routes, and designated instructional areas.
2. SAFETY PLAN integration which includes Instruction on the AQUATIC FACILITY SAFETY PLAN, including emergency action procedures, communication protocols, and roles and responsibilities during normal operations and emergency situations.
3. Supervision and risk management practices which includes identification of risks specific to instructional SWIM PROGRAMS, including mixed swimming abilities, class ratios, instructor in-water engagement, and transition periods, and the application of mitigation strategies.
4. Coordination with QUALIFIED LIFEGUARDS which includes procedures for communication and coordination with QUALIFIED LIFEGUARDS, including role differentiation, activation of the EAP, transfer of care, and incident reporting.
5. Instructional program standards which includes a review of program expectations, including class structure, participant management, instructional progression, and the use of approved teaching methods and equipment.
6. Equipment use and limitations which include the proper use, purpose, and limitations of instructional equipment, flotation devices, and teaching aids used within the program.
7. Participant safety and inclusion considerations which include strategies to support safe participation for individuals of varying ages, abilities, and needs, including recognition of distress, class control during emergencies, and appropriate response within the instructor's scope.
8. Documentation and reporting requirements which includes procedures for attendance tracking, incident and injury reporting, and communication with supervisors or program leads.

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.2 Aquatic Facility Requirements for Swimming Instruction Swim Programs

8.0.2.4 Facility Specific Training

8.0.2.4.2 Pre-service Training For Swim Instructors

8.0.2.4.2.1 Documented

Pre-service training shall be documented and completed in accordance with AQUATIC FACILITY policies prior to assignment of independent instructional duties.

8.0.2.4.3 Inservice Training For Swim Instructors

QUALIFIED SWIM INSTRUCTORS shall participate in a documented, ongoing in-service training program conducted by the AQUATIC FACILITY to maintain instructional COMPETENCY, reinforce safety practices, and ensure readiness to support safe program delivery.

8.0.2.4.4 Emergency Drills Involving Instructional Staff

AQUATIC FACILITIES shall include instructional staff in required emergency drills per MAHC **6.3.5.3**.

8.0.2.4.4.1 Training and Drill Components

Training and drills shall address scenarios specific to swimming instruction environments and shall include, but not be limited to, the following:

1. Participant illness, injury, distress, or drowning during instruction
2. Missing or unaccounted-for participant during instructional activities or transitions
3. Distress recognition and response for novice or non-swimmers
4. Hazardous or changing aquatic conditions
5. Assistance and retrieval from instructional equipment or platforms
6. Emergency communication and coordination

8.0.2.4.4.2 Training and Drill Documentation

Training and drills shall be documented and reviewed for continuous improvement.

Section 2.0: Code Language (cont.)

8.0 Swim Instructor Training

8.0.2 Aquatic Facility Requirements for Swimming Instruction Swim Programs

8.0.2.4 Facility Specific Training

8.0.2.4.5 Coordination of Roles Between Lifeguards and Swim Instructors

8.0.2.4.5.1 Written Procedures

AQUATIC FACILITIES shall establish written procedures describing the distinct responsibilities of QUALIFIED LIFEGUARDS and QUALIFIED SWIM INSTRUCTORS during routine operations and emergencies.

8.0.2.4.5.2 Lifeguard Responsibilities During Instructional Swim Programs

QUALIFIED LIFEGUARDS shall maintain uninterrupted scanning responsibilities.

8.0.2.4.5.3 Swim Instructor Responsibilities During Instructional Swim Programs

QUALIFIED SWIM INSTRUCTORS shall be responsible for class instruction, participant management, and cooperation with QUALIFIED LIFEGUARDS during emergencies.

8.0.2.5 Instructor Competency and Safety Verification

8.0.2.5.1 Instructor Competency Demonstration

Before independently leading instruction, QUALIFIED SWIM INSTRUCTORS shall demonstrate COMPETENCY to the AQUATIC FACILITY in:

1. Emergency communication
2. Participant grouping and supervision
3. Equipment use and hazard recognition
4. Safe class entry and exit procedures
5. Coordination with QUALIFIED LIFEGUARDS during EAP activation

8.0.2.5.2 Instructor Competency Documentation

Competencies shall be evaluated and documented according to the facility's training and safety policies.

Section 3.0: Annex Language

8.0 —Swim Instructor Training

This portion of the MAHC deals directly with providing QUALIFIED SWIM INSTRUCTORS in an AQUATIC FACILITY to first reduce risk that could lead to injury, and secondly provide high quality instructional SWIM PROGRAMS for those learning to swim. The goal of this section is to give POOL and SWIM PROGRAM owners and operators best practice guidelines as tools to make SWIM PROGRAMS and AQUATIC FACILITIES safer for the general public.

8.0.1 —Swim Instructor Qualifications

Every day, about ten people die from unintentional drowning (324). Of these, one is a child ages 1–4 years. Drowning is the fifth leading cause of unintentional injury death for people of all ages, and the second leading cause of unintentional injury death for children ages 1–14 years.(324) From 2010-2019, there were on average 3,619 fatal unintentional drownings (non-boating related) in the United States per year and more than one in six people who die from drowning are children ages 0–14 years(324). Nonfatal drowning can cause brain damage that can result in long-term disabilities including memory problems, learning disabilities, and permanent loss of basic functioning (e.g., permanent vegetative state).(325, 326). Participation in formal swim lessons was associated with an 88% reduction in drowning risk among children ages 1–4 ¹. Appropriately trained and QUALIFIED SWIM INSTRUCTORS are one way to reduce drowning risk at public AQUATIC VENUES and also provide community impact in drowning prevention. Additionally, a minimum CERTIFICATION age of 15 aligns with federal child labor provisions under the Fair Labor Standards Act (FLSA)², which permit 15-year-olds to perform lifeguarding and certain swim instruction duties in traditional aquatic environments. These provisions establish a federal benchmark for the maturity, judgment, and physical capability necessary to carry out safety-sensitive responsibilities, supporting the protection of both participants and young workers.

To create a culture of aquatics safety in an AQUATIC FACILITY, QUALIFIED SWIM INSTRUCTORS shall receive preservice training on CPR/AED, First AID, and Child Protection. Requiring QUALIFIED SWIM INSTRUCTORS to hold current professional-level CERTIFICATION in CPR/AED and First Aid ensures alignment with nationally and internationally recognized, evidence-based resuscitation and emergency care standards, including those established by the International Liaison Committee on Resuscitation (ILCOR) and Occupational Safety and Health Administration (OSHA). This requirement supports rapid, appropriate response to aquatic and non-aquatic emergencies across all age groups, reinforces consistency in lifesaving techniques among staff, and reduces risk by ensuring instructors are prepared to act as first responders within the aquatic environment while awaiting advanced care. Requiring criminal background checks for individuals over 18, along with training in child abuse prevention, supports a comprehensive approach to youth protection within aquatic SWIM PROGRAMS. These measures help reduce the risk of harm by promoting safe hiring practices and ensuring instructors are prepared to recognize, prevent, and appropriately respond to signs of abuse, including fulfilling mandated reporting obligations. Inclusion of child protection training—such as SWIM PROGRAMS aligned with SafeSport principles or equivalent—reinforces a culture of safety by addressing boundaries, preventing inappropriate conduct (including grooming behaviors), and establishing clear expectations for adult–child interactions in aquatic environments.

Section 3.0: Annex Language (cont.)

8.0.1.1 — Course Content Swim Instructor Qualifications

Establishing explicit course-content requirements for QUALIFIED SWIM INSTRUCTOR training within the Model Aquatic Health Code (MAHC) creates a framework swim instruction SWIM PROGRAMS meet a consistent, evidence-based standard for safety, effectiveness, and public health protection. Because swimming lessons are a key drowning-prevention strategy, clear training expectations support the MAHC's mission to reduce aquatic-related injury and illness risk in public facilities.

8.0.1.1.1 Physical Competency and Swim Skill Proficiency

The Model Aquatic Health Code (MAHC) recommends that QUALIFIED SWIM INSTRUCTORS meet physical and instructional standards to support quality programming.

1. QUALIFIED SWIM INSTRUCTORS need to demonstrate strokes, skills, and drills accurately.
2. Physical COMPETENCY helps:
 - a. Ensures QUALIFIED SWIM INSTRUCTORS can maintain control in the water, support swimmers in distress, and, as needed, perform rescues.
 - b. Allows them to correct form, show progressions, and adapt techniques for different levels. Additionally, facilities reduce liability by ensuring instructors are qualified and physically prepared.
 - c. Helps prevent incidents caused by instructor fatigue, poor technique, or inability to assist swimmers in need.
3. Organizations like the American Red Cross and YMCA require instructors to pass swim skill assessments as part of CERTIFICATION.

When AUTHORIZED TRAINING AGENCIES do not have adequate water depth to allow for safe jumping in water over the head for the "safe water entry skill" it is acceptable to have QUALIFIED SWIM INSTRUCTOR walk into water until they can no longer stand get into a float or tread position to continue to assess swimming skills of WATER COMPETENCY. The goal would be for the QUALIFIED SWIM INSTRUCTOR to demonstrate safe entry into water appropriate to the INSTRUCTIONAL ENVIRONMENT and return safely to the surface.

8.0.1.1.2 —Hazard Identification and Injury Prevention

QUALIFIED SWIM INSTRUCTOR training should include hazard identification and injury prevention because these components are essential to creating a safe and effective aquatic learning environment. Instructors play a critical role in recognizing and mitigating risks associated with aquatic settings, including environmental hazards, participant behaviors, and skill-level mismatches. Training that emphasizes hazard awareness and proactive prevention strategies supports the ability to anticipate potential incidents and implement appropriate controls before they result in injury. Integrating these principles into instruction promotes safer participant behaviors, reinforces water safety knowledge, and complements supervision systems already in place. Emphasis on hazard identification and injury prevention aligns with a layered approach to drowning prevention and helps ensure that instruction is delivered in a manner that prioritizes both learning and safety.

Section 3.0: Annex Language (cont.)

8.0.1.1.3 —Emergency Response Skill Set

QUALIFIED SWIM INSTRUCTORS work in aquatic environments where participant distress, unsafe behaviors, and emergencies may occur. Emergency response preparation helps instructors recognize concerns early, maintain participant safety, activate emergency procedures, and support coordinated facility response.

Emergency preparedness training for QUALIFIED SWIM INSTRUCTORS should be appropriate to the INSTRUCTIONAL ENVIRONMENT and aligned with the instructor's role within the facility's safety systems, including the Emergency Action Plan (EAP) and SAFETY PLAN. Emergency response preparation supports:

- **Recognition and Prevention**
 - Instructors should be able to recognize signs of participant distress, unsafe behaviors, and changing aquatic conditions in order to support early intervention and participant safety.
- **Emergency Communication and Response Activation**
 - Instructors should understand how to activate emergency procedures, communicate with QUALIFIED LIFEGUARDS or emergency personnel, and manage participants during an emergency.
- **PARTICIPANT SUPERVISION and Class Management**
 - Emergency preparedness training helps instructors maintain safe PARTICIPANT SUPERVISION, organize class movement, and support orderly evacuation or transfer of care when necessary.
- **Coordination with Facility Safety Systems**
 - Integrating QUALIFIED SWIM INSTRUCTORS into facility emergency procedures supports consistent communication, role clarity, and coordinated response during emergencies.

Emergency response preparation for QUALIFIED SWIM INSTRUCTORS is intended to support recognition, activation of emergency procedures, participant management, and coordination with QUALIFIED LIFEGUARDS or emergency responders, and is not intended to replace QUALIFIED LIFEGUARD training or CERTIFICATION requirements.

8.0.1.1.4 —Basic Swimming Knowledge Skill Set

QUALIFIED SWIM INSTRUCTORS should have basic swimming knowledge because it forms the foundation of their ability to teach, supervise, and minimize risk in aquatic environments. This begins with the foundational skills of WATER COMPETENCY and water safety. For those who are teaching intermediate and higher-level skills, instructors should be able to model strokes, breathing techniques, and body positions accurately, or be able to identify another individual who can, as well as skills such as entries, starts, and turns, and other skills specific to the stage or level of instruction being taught. QUALIFIED SWIM INSTRUCTORS should also be able to understand skill progressions, be able to breakdown complex skills into manageable steps, and recognize when a swimmer is ready to advance or needs more support.

Section 3.0: Annex Language (cont.)

8.0.1.1.5 —Curriculum Familiarity

It is important for QUALIFIED SWIM INSTRUCTORS to be familiar with the swim lesson curriculum they teach because it directly impacts the quality, consistency, and safety of instruction. Curriculum familiarity ensures that instructors understand the intended progression of skills, learning objectives, and instructional methods, allowing them to deliver lessons as designed and appropriate to participant age and ability. Consistent implementation of a recognized curriculum supports the development of WATER COMPETENCY, reinforces critical water safety concepts, and reduces variability in instruction that may lead to skill gaps or unsafe practices. Additionally, familiarity with the curriculum enables instructors to effectively assess participant progress, make appropriate modifications, and maintain alignment with organizational standards and recognized best practices.

8.0.1.1.6 —Instructional Techniques Skill Set

QUALIFIED SWIM INSTRUCTORS shall have strong instructional techniques because they are expected to teach people of varying ages and stages of mental and physical development. They must be able to understand their students' current skill levels, provide skill progressions and scaffolding suitable for all ages and ability levels, and assess their progress.

8.0.1.2 —Swim Instructor Training Delivery

QUALIFIED SWIM INSTRUCTOR training delivery should be structured, comprehensive, and COMPETENCY-based to ensure that instructors are prepared to safely and effectively deliver aquatic instruction. Training that incorporates standardized materials, qualified instructional leadership, and sufficient practice opportunities supports consistent program quality and reinforces the development of WATER COMPETENCY and water safety behaviors among participants.

8.0.1.2.1 — Standardized and Comprehensive

The use of standardized curriculum materials ensures consistency in the delivery of QUALIFIED SWIM INSTRUCTOR training across instructors, facilities, and geographic locations. Comprehensive coverage of required topics supports alignment with recognized standards and promotes instructional fidelity. Consistent training reduces variability in teaching practices, helps ensure that essential water safety and skill development components are addressed, and supports a shared baseline of instructor COMPETENCY.

8.0.1.2.2 — Cognitive and Knowledge Components

Flexible delivery methods, including online and blended learning, may enhance access to QUALIFIED SWIM INSTRUCTOR training while maintaining educational effectiveness when appropriate controls are in place. Verification of student identity, validated assessment processes, and proper documentation help ensure the integrity of training and confirm that required knowledge has been achieved. Maintaining rigor in cognitive and knowledge components supports informed decision-making and reinforces safe instructional practices.

Section 3.0: Annex Language (cont.)

8.0.1.2.3 — Skills Practice

In-water and out-of-water skills practice is essential to the development of effective QUALIFIED SWIM INSTRUCTORS. Practical application of instructional techniques, skill demonstrations, and participant management strategies allows instructor candidates to translate knowledge into practice. Training led by a qualified instructor trainer ensures that skills are demonstrated correctly, feedback is provided in real time, and candidates are prepared to manage dynamic aquatic environments.

8.0.1.2.4 — Sufficient Time

Providing sufficient time within QUALIFIED SWIM INSTRUCTOR training courses allows for thorough coverage of content, meaningful practice, and valid COMPETENCY evaluation. Condensed or accelerated training without adequate time for skill development may limit instructor readiness and increase the likelihood of inconsistent or unsafe instructional practices. Adequate course duration supports skill mastery, confidence, and the ability to apply knowledge in real-world settings.

8.0.1.2.5 — Certified Swim Instructor Trainers

QUALIFIED SWIM INSTRUCTOR TRAINERS play a critical role in ensuring the effectiveness and integrity of training SWIM PROGRAMS. Trainers who are certified by the curriculum-developing agency are more likely to deliver instruction in accordance with established standards and expectations. This consistency helps ensure that instructor candidates receive accurate information, appropriate skill modeling, and reliable evaluation.

8.0.1.2.6 — Instructor and Instructor Trainer Qualifications, Prerequisites, and Quality Systems

Establishing minimum prerequisites for instructor trainer candidates helps ensure that participants enter training with the foundational skills necessary to succeed. Requiring instructor trainers to complete formal preparation—demonstrating content mastery, instructional ability, evaluation COMPETENCY, and course management skills—supports high-quality training delivery.

Ongoing renewal or recertification processes for both QUALIFIED SWIM INSTRUCTORS and instructor trainers help ensure that knowledge and skills remain current with evolving standards and practices. Quality-control systems, including instructor trainer evaluation and feedback mechanisms, promote continuous improvement and consistency across training SWIM PROGRAMS. These systems align with a risk management approach by verifying that those responsible for training others maintain the COMPETENCY necessary to deliver safe and effective instruction.

Section 3.0: Annex Language (cont.)

8.0.1.2.7 — Training Equipment

Access to appropriate training equipment and resources is essential for effective QUALIFIED SWIM INSTRUCTOR preparation. Training that includes the use of curriculum materials, instructional aids, aquatic teaching equipment, and safety resources supports both knowledge development and practical skill application. Adequate student-to-equipment ratios ensure that all instructor candidates have meaningful opportunities to practice and demonstrate required skills. Examples of equipment used during the course of instruction includes, but is not limited to:

1. **AUTHORIZED TRAINING AGENCY curriculum resources**

- a. Current, approved instructional materials, lesson plans, and course content provided by the certifying or AUTHORIZED TRAINING AGENCY, ensuring alignment with established standards and learning objectives.

2. **Instructional teaching aids**

- a. Visual, auditory, and physical teaching tools used to support skill demonstration, participant engagement, and effective instruction, such as diagrams, demonstration equipment, and communication tools.

3. **Aquatic instructional equipment**

- a. Equipment necessary to teach and practice foundational and progressive swimming skills, which may include kickboards, pull buoys, lifejackets or personal flotation devices (PFDs), noodles, and other buoyancy or support equipment appropriate to the instructional setting and participant ability.

4. **Rescue and safety equipment**

- a. Equipment used to demonstrate and practice water safety, supervision, and emergency response skills, including reaching and throwing assist devices, rescue tubes (where applicable), and access to emergency communication systems consistent with facility requirements.

5. **WATER COMPETENCY and skill assessment tools**

- a. Resources used to evaluate participant skill progression and COMPETENCY, such as skill checklists, evaluation forms, and standardized assessment criteria aligned with the AUTHORIZED TRAINING AGENCY's curriculum.

6. **Administrative and documentation materials**

- a. Materials necessary to track attendance, performance, and CERTIFICATION requirements, including rosters, evaluation records, and CERTIFICATION documentation systems.

The inclusion of rescue and safety equipment reinforces the integration of water safety principles within instructional settings. Assessment tools and administrative materials support the evaluation and documentation of COMPETENCY, contributing to program accountability and quality assurance. Ensuring that equipment is safe, functional, and appropriate to participant needs supports a training environment that reflects real-world instructional conditions and promotes safe program delivery.

Section 3.0: Annex Language (cont.)

8.0.1.3 — COMPETENCY and CERTIFICATION

COMPETENCY and CERTIFICATION processes are critical to ensuring that QUALIFIED SWIM INSTRUCTORS and QUALIFIED SWIM INSTRUCTOR trainers possess the knowledge, skills, and judgment necessary to deliver safe and effective aquatic instruction. Establishing clear expectations for proficiency, evaluation, CERTIFICATION validity, and ongoing oversight supports consistency across training SWIM PROGRAMS and aligns with a risk management approach to drowning prevention and participant safety.

8.0.1.3.1 — Proficiency

Verification of proficiency ensures that QUALIFIED SWIM INSTRUCTOR candidates and QUALIFIED SWIM INSTRUCTOR trainers can consistently demonstrate the knowledge, skills, and instructional behaviors required for effective teaching.

Evaluation of a QUALIFIED SWIM INSTRUCTOR candidate by a qualified instructor trainer provides an objective measure of readiness and helps ensure that instructors can safely apply skills in a variety of instructional settings. Establishing proficiency standards through training agencies allows for consistency while accommodating program-specific delivery models and participant needs.

8.0.1.3.2 — Trainer Physically Present

Requiring the trainer of record to be physically present during instructional time, skills evaluation, and testing helps ensure the integrity and validity of the training process. Direct oversight allows trainers to observe candidate performance, provide immediate feedback, and verify that evaluations are conducted accurately and consistently. This presence supports accountability and reinforces the quality and credibility of CERTIFICATION outcomes.

8.0.1.3.3 — Certification

CERTIFICATION serves as formal recognition that an individual has met established training and COMPETENCY requirements. Requiring QUALIFIED SWIM INSTRUCTORS and instructor trainers to hold valid CERTIFICATIONS confirms that they have successfully completed standardized training aligned with MAHC expectations.

Additionally, maintaining current CPR/AED and First Aid CERTIFICATIONS supports preparedness for emergency response and reinforces a layered approach to safety within aquatic environments.

8.0.1.3.4 — Length of Certification

Limiting the duration of CERTIFICATION helps ensure that instructor knowledge and skills remain current with evolving standards, practices, and safety guidance. Regular renewal cycles encourage ongoing engagement with training content, reinforce critical skills, and reduce the likelihood of skill degradation over time. Aligning CERTIFICATION timeframes with CPR/AED and First Aid validity further supports readiness to respond to emergencies.

Section 3.0: Annex Language (cont.)

8.0.1.3.5 — Documentation Retention

Maintaining accurate and complete documentation of training and CERTIFICATION supports verification, accountability, and program oversight. Documentation of participant identity, training completion, CERTIFICATION status, and trainer information allows organizations and regulatory authorities to confirm compliance with established requirements. Effective documentation systems also support quality assurance, audit processes, and continuous improvement efforts.

8.0.1.3.6 — Expired Certification

Establishing clear requirements for expired CERTIFICATIONS helps ensure that instructors returning to the role have maintained or reestablished COMPETENCY. When CERTIFICATION has lapsed beyond an acceptable timeframe, requiring full retraining helps ensure that individuals are reintroduced to current standards, instructional practices, and safety expectations. This reduces risk associated with outdated knowledge or skill degradation.

8.0.1.3.6.1 — Expiration Within Limited Timeframe

Allowing a limited grace period for recently expired CERTIFICATIONS provides flexibility while maintaining safety and COMPETENCY expectations. During this period, options such as retraining or completion of a challenge program allow individuals to demonstrate retained COMPETENCY without requiring full course repetition, while still ensuring that skills and knowledge are validated.

8.0.1.3.6.2 — Challenge Program

Challenge SWIM PROGRAMS provide an alternative pathway for experienced instructors to demonstrate continued COMPETENCY. These SWIM PROGRAMS emphasize rigorous evaluation, including prerequisite screening and comprehensive practical assessment of instructional and water-based skills. Requiring alignment with the original certifying agency and oversight by a qualified trainer helps ensure that COMPETENCY standards are maintained and that CERTIFICATION remains credible and consistent.

8.0.1.3.6.3 — Renewal, Suspension, and Revocation

Processes for renewal, continuing education, and potential suspension or revocation of CERTIFICATION are essential for maintaining the integrity of QUALIFIED SWIM INSTRUCTOR SWIM PROGRAMS. Renewal ensures that instructors remain current with evolving practices, while suspension or revocation procedures provide mechanisms to address performance concerns, policy violations, or safety risks. These processes support accountability and protect participant safety.

8.0.1.3.6.4 — Certificate Renewal

Structured renewal processes reinforce the importance of ongoing COMPETENCY and provide opportunities for instructors to refresh and demonstrate required skills. Incorporating practical skill evaluation, alignment with original training standards, and trainer oversight ensures that renewal is meaningful and reflects current expectations. Allowing completion through a challenge program within a defined timeframe offers flexibility while maintaining rigor.

Section 3.0: Annex Language (cont.)

8.0.1.3.7 — Curriculum Review and Update

Regular review and updating of training curricula help ensure alignment with current MAHC standards, emerging evidence, and evolving best practices in aquatic instruction and drowning prevention. This process supports continuous improvement and ensures that training remains relevant, effective, and responsive to changes in the field.

8.0.1.3.8 — Candidate Remediation

Providing structured remediation pathways allows candidates who do not initially demonstrate required competencies to receive additional training, feedback, and reevaluation. This supports skill development while maintaining standards, ensuring that CERTIFICATION is awarded only when COMPETENCY is achieved. Remediation processes also promote fairness and consistency in evaluation.

8.0.1.3.9 — Certificate Suspension and Revocation

Establishing procedures for certificate suspension and revocation provides a mechanism for addressing situations in which an instructor no longer meets required standards or poses a potential risk to participant safety. These processes reinforce accountability, support program integrity, and ensure that only qualified individuals are authorized to deliver swim instruction.

8.0.2 — Aquatic Facility Requirements for Swimming Instruction Swim Programs

Aquatic facilities providing swimming instruction SWIM PROGRAMS should ensure that staffing, supervision, and operational practices support a safe and effective learning environment. Instructional SWIM PROGRAMS introduce participants with varying levels of skill and WATER COMPETENCY, often including beginners and non-swimmers, which may increase risk without appropriate safeguards. Aligning instructional program operations with established QUALIFIED LIFEGUARD deployment and supervision requirements supports a layered approach to drowning prevention and reinforces participant safety during instructional activities.

8.0.2.1 — Lifeguard Requirement for Instructional Swim Programs

Requiring aquatic facilities that offer group swimming instruction SWIM PROGRAMS to comply with QUALIFIED LIFEGUARD deployment requirements ensures that a dedicated layer of surveillance and emergency response is maintained. While QUALIFIED SWIM INSTRUCTORS are actively engaged in teaching and participant interaction, QUALIFIED LIFEGUARDS provide focused supervision of the entire aquatic environment, enabling early recognition of distress and rapid response to incidents. This separation of responsibilities supports a more effective safety system by allowing instructors to focus on instruction while QUALIFIED LIFEGUARDS maintain continuous scanning and surveillance responsibilities.

8.0.2.1.1 — Lifeguard Staffing

The presence of qualified SWIM INSTRUCTORS should not replace or reduce required QUALIFIED LIFEGUARD staffing levels, as instructional duties inherently limit an instructor's ability to provide continuous surveillance of all participants and the aquatic environment. Maintaining required QUALIFIED LIFEGUARD staffing ensures that supervision remains consistent and uninterrupted, even during active teaching, skill demonstration, or individual assistance. This approach reinforces a layered safety strategy by ensuring that instruction and surveillance functions are performed concurrently and independently, reducing the likelihood of delayed recognition or response to an emergency.

Section 3.0: Annex Language (cont.)

8.0.2.2 — Swim Lessons and Safety-Related Equipment

Aquatic facilities providing swimming instruction SWIM PROGRAMS should ensure that instructional staff are clearly identifiable and that required safety, communication, and rescue equipment is readily accessible and properly maintained. These elements support effective supervision, timely emergency response, and overall program safety, particularly in environments where participants may have limited WATER COMPETENCY.

8.0.2.2.1 — Identifying Uniform

Clearly identifying qualified SWIM INSTRUCTORS as instructional staff helps participants, caregivers, and other facility users quickly recognize those responsible for instruction and assistance. Visible identification supports effective communication, enhances participant confidence, and reduces confusion during both routine instruction and emergency situations. Distinguishing instructional staff from QUALIFIED LIFEGUARDS also reinforces the separation of roles and responsibilities within a layered safety system.

8.0.2.2.2 — Required Communication, First Aid, and Rescue Equipment

Access to communication systems, first aid supplies, and rescue equipment is critical for timely and effective response to incidents that may occur during swim lessons. Aligning instructional SWIM PROGRAMS with established MAHC equipment requirements ensures that facilities maintain a consistent level of preparedness across all aquatic operations. These resources support rapid activation of emergency action plans, immediate care for injuries, and effective assistance to participants in distress, reinforcing a comprehensive approach to risk management.

8.0.2.2.3 — Reaching Pole

Providing a reaching pole in facilities operating with a single QUALIFIED LIFEGUARD during instruction offers an additional layer of safety by supporting rapid, non-contact rescues. Reach equipment allows for safer assistance to participants in distress while minimizing risk to rescuers and maintaining surveillance of the aquatic environment. Ensuring that such equipment meets established specifications and is readily accessible enhances response capability, particularly in instructional settings where participant skill levels may vary.

8.0.2.2.4 — Sun-Blocking Methods for Outdoor Instruction

Training QUALIFIED SWIM INSTRUCTORS on sun protection measures helps reduce the risk of UV-related injury and supports staff health and performance during outdoor instruction. Instructors often experience prolonged exposure to sunlight, which can lead to fatigue, decreased attentiveness, and increased health risks if not managed appropriately. Providing education on the use of protective clothing, hats, shade structures, and sunscreen supports staff well-being and helps maintain instructional effectiveness and vigilance. Emphasizing both the risks of exposure and the proper use of protective measures contributes to a safer and more sustainable INSTRUCTIONAL ENVIRONMENT.

Section 3.0: Annex Language (cont.)

8.0.2.3 — Safety Plan Requirements for Instructional Swim Programs

SAFETY PLANs (ASPs) for facilities offering swimming instruction SWIM PROGRAMS should incorporate the unique risks and operational considerations associated with instructional activities. Swim lessons often involve participants with varying levels of WATER COMPETENCY, increased instructor engagement, and dynamic transitions between activities. Integrating instructional program considerations into the ASP supports a comprehensive and proactive approach to risk management, enhances supervision effectiveness, and reinforces a layered system of drowning prevention.

8.0.2.3.1 — Safety Plan

Including swimming instruction SWIM PROGRAMS within the SAFETY PLAN ensures that policies, procedures, and emergency response protocols reflect the full scope of facility operations. Instructional settings present distinct supervision and risk management challenges that differ from general recreational swimming. Addressing these elements within the ASP helps ensure alignment between instructional practices, QUALIFIED LIFEGUARD deployment, and emergency action planning, and supports consistent implementation of safety measures across all aquatic activities.

8.0.2.3.1.1 — Instructional Activities Components

Swimming instruction SWIM PROGRAMS introduce specific risk factors that should be identified and addressed within the SAFETY PLAN. Participants may have mixed swimming abilities, requiring differentiated supervision and instruction to ensure safety. Instructor in-water engagement and class ratios may limit the instructor's ability to maintain broad visual surveillance, reinforcing the need for dedicated QUALIFIED LIFEGUARD oversight.

Transition periods between activities or classes can present increased risk due to movement, distraction, and changes in supervision coverage. The use of platforms, teaching aids, or shallow-water supports may create additional environmental hazards if not properly managed. Additionally, deep-water instruction involving non-swimmers requires careful planning, appropriate skill progression, and enhanced supervision to reduce risk. Identifying these factors within the SAFETY PLAN supports proactive planning and safer instructional delivery.

8.0.2.3.1.2 — Hazard Mitigation Strategies Components

Hazard mitigation strategies within the SAFETY PLAN should clearly define the roles and responsibilities of QUALIFIED LIFEGUARDS and QUALIFIED SWIM INSTRUCTORS to ensure effective supervision and response. Distinguishing responsibilities helps ensure that QUALIFIED LIFEGUARDS remain focused on surveillance and emergency response, while instructors concentrate on teaching and participant engagement.

Mitigation strategies may include adjustments to class size and ratios, designated instructional zones, enhanced QUALIFIED LIFEGUARD coverage during instructional periods, structured transition procedures, and clear communication protocols between instructors and QUALIFIED LIFEGUARDS. Establishing these controls reduces the likelihood of incidents and supports timely recognition and response when needed. Clearly defined responsibilities and procedures also promote consistency, accountability, and coordination among staff, contributing to a safer aquatic environment.

Section 3.0: Annex Language (cont.)

8.0.2.4 — Facility-Specific Training

Facility-specific training for QUALIFIED SWIM INSTRUCTORS should ensure that instructional staff understand how to apply their training within the unique environment, operations, and risk profile of the aquatic facility. While instructor CERTIFICATION establishes baseline COMPETENCY, facility-specific training integrates those competencies with site-specific procedures, supervision systems, and emergency response protocols. This integration supports a layered approach to drowning prevention and ensures that instructional staff can effectively contribute to both participant learning and facility safety.

8.0.2.4.1 — Emergency Action Plan Training for Swim Instructors

Training QUALIFIED SWIM INSTRUCTORS on the facility's Emergency Action Plan (EAP) ensures that instructional staff understand their roles and responsibilities during emergency situations. Although QUALIFIED LIFEGUARDS are primarily responsible for surveillance and rescue, QUALIFIED SWIM INSTRUCTORS often serve as first points of contact for participants and must be prepared to recognize emergencies, initiate response protocols, and assist within their scope. Requiring initial and ongoing EAP training helps ensure timely, coordinated responses and reinforces consistency between instructional staff and QUALIFIED LIFEGUARDS.

8.0.2.4.2 — Pre-Service Training for Swim Instructors

Pre-service training prepares QUALIFIED SWIM INSTRUCTORS to safely deliver instruction within the specific operational and environmental context of the aquatic facility. Orientation to the facility layout, SAFETY PLANS, and program expectations supports situational awareness and reduces uncertainty during both routine instruction and emergency situations. Emphasizing supervision practices, coordination with QUALIFIED LIFEGUARDS, and participant risk factors helps instructors understand how their role fits within the broader safety system.

Pre-service training also provides an opportunity to align instructors with program standards, equipment use, and documentation expectations. This alignment promotes consistency in instructional delivery, reinforces safe practices, and ensures that instructors are prepared to meet both program and safety requirements prior to independent teaching.

8.0.2.4.3 — In-Service Training for Swim Instructors

Ongoing in-service training supports the maintenance and advancement of instructional COMPETENCY over time. Regular training reinforces key instructional techniques, safety practices, and facility procedures, while also allowing instructors to adapt to changes in programming, staffing, or risk conditions. Incorporating scenario-based training and COMPETENCY verification helps ensure that instructors are prepared to respond effectively in dynamic INSTRUCTIONAL ENVIRONMENTS.

In-service training also promotes continuous quality improvement by providing opportunities for feedback, evaluation, and skill refinement. Regular engagement in training helps reduce skill degradation, enhances coordination with QUALIFIED LIFEGUARDS, and supports consistent application of safety and instructional standards.

Section 3.0: Annex Language (cont.)

8.0.2.4.4 — Emergency Drills Involving Instructional Staff

Including QUALIFIED SWIM INSTRUCTORS in emergency drills ensures that all personnel involved in aquatic operations are prepared to respond effectively during incidents. INSTRUCTIONAL ENVIRONMENTS present unique challenges, such as managing groups, assisting participants with varying skill levels, and coordinating during transitions. Participation in drills helps instructors practice their roles in emergency situations, improves communication with QUALIFIED LIFEGUARDS, and reinforces the application of the Emergency Action Plan. Drills may happen in in-service training, pre-service training or on-the-job training.

8.0.2.4.4.1 — Training and Drill Components

Drills for instructional staff should reflect scenarios that are specific to swimming lesson environments. These may include participant illness or distress during lessons, missing participants during transitions, and the management of novice swimmers exhibiting distress behaviors. Additional considerations include responding to hazardous conditions, safely managing instructional equipment, and coordinating communication between instructors and QUALIFIED LIFEGUARDS.

Incorporating these scenarios into drills helps ensure that instructors are prepared to recognize risks, take appropriate action within their scope, and support coordinated emergency responses. Scenario-based practice strengthens readiness and reinforces the integration of instructional and safety responsibilities.

Specific components can include:

1. Participant illness, injury, distress, or drowning during instruction

- a. Response to medical or water-related emergencies occurring during active lessons, including recognition, activation of the emergency action plan, and coordination with QUALIFIED LIFEGUARDS.

2. Missing or unaccounted-for participant during instructional activities or transitions

- a. Procedures for identifying, reporting, and responding to a missing participant, including headcounts, supervision transitions, and facility search protocols.

3. Distress recognition and response for novice or non-swimmers

- a. Identification and management of distress behaviors commonly exhibited by participants with limited WATER COMPETENCY, including appropriate instructor actions within scope.

4. Hazardous or changing aquatic conditions

- a. Response to conditions that may impact participant safety, including water clarity issues, weather impacts (for outdoor facilities), overcrowding, or equipment hazards.

5. Assistance and retrieval from instructional equipment or platforms

- a. Safe management and removal of participants from teaching aids, platforms, or shallow-water supports in both routine and emergency conditions.

6. Emergency communication and coordination

- a. Communication procedures between QUALIFIED SWIM INSTRUCTORS and QUALIFIED LIFEGUARDS, including notification of incidents, activation of emergency protocols, and role clarity during response.

Section 3.0: Annex Language (cont.)

8.0.2.4.4.2 — Drill and Training Documentation

Documenting and reviewing all training and emergency drills supports continuous improvement and accountability within aquatic SWIM PROGRAMS. Records of training, drill participation, scenarios practiced, and performance outcomes allow facilities to identify strengths, address gaps, and refine training procedures over time. Regular review of training and drill outcomes helps ensure that training remains relevant, effective, and aligned with current facility operations and risk conditions.

8.0.2.4.5 — Coordination of Roles Between Lifeguards and SWIM Instructors

Clear coordination between QUALIFIED LIFEGUARDS and QUALIFIED SWIM INSTRUCTORS is essential to maintaining an effective layered safety system in aquatic facilities. While both roles contribute to participant safety, their primary responsibilities differ. QUALIFIED LIFEGUARDS are responsible for continuous surveillance and emergency response, while QUALIFIED SWIM INSTRUCTORS are responsible for instruction, class safety management, and participant engagement. Clearly defining and reinforcing these roles helps prevent gaps in supervision, reduces confusion during emergencies, and supports timely recognition and response to incidents.

8.0.2.4.5.1 — Written Procedures

Establishing written procedures that define the roles and responsibilities of QUALIFIED LIFEGUARDS and QUALIFIED SWIM INSTRUCTORS promotes consistency and accountability across staff. These procedures provide clear expectations for routine operations and emergency situations, including communication protocols, transfer of responsibility, and activation of the Emergency Action Plan (EAP). Written guidance helps ensure that all staff understand their roles prior to instruction, reducing variability in practice and improving coordination during both normal and high-risk situations.

8.0.2.4.5.2 — Lifeguard Responsibilities During Instructional Swim Programs

Maintaining uninterrupted scanning is critical to effective QUALIFIED LIFEGUARD performance, particularly during instructional SWIM PROGRAMS where instructors may be focused on individuals or small groups. QUALIFIED LIFEGUARDS provide a dedicated layer of surveillance over the entire aquatic environment, enabling early recognition of distress and rapid response. Reinforcing uninterrupted scanning ensures that supervision is not compromised by instructional activities and that a vigilant safety presence is consistently maintained.

8.0.2.4.5.3 — Swim Instructor Responsibilities During Instructional Swim Programs

QUALIFIED SWIM INSTRUCTORS are responsible for delivering instruction, managing participants, and supporting a safe learning environment within their assigned class. Because instructors are actively engaged in teaching and participant interaction, their ability to provide comprehensive surveillance is limited. Clearly defining instructor responsibilities helps ensure that instructional duties do not conflict with QUALIFIED LIFEGUARD responsibilities and that instructors understand their role in recognizing distress, maintaining class control, and supporting emergency response within their scope.

Effective coordination between instructors and QUALIFIED LIFEGUARDS—including clear communication, mutual awareness of participant risk levels, and practiced response procedures—enhances overall safety and supports a cohesive approach to aquatic risk management.

Section 3.0: Annex Language (cont.)

8.0.2.5 — Instructor Competency and Safety Verification

Instructor COMPETENCY and safety verification processes should be integrated into pre-service training, onboarding, and/or structured shadowing experiences to ensure that QUALIFIED SWIM INSTRUCTORS can safely apply their skills within the specific operational context of the aquatic facility. While CERTIFICATION establishes baseline COMPETENCY, facility-level verification confirms that instructors can effectively perform critical tasks in real-world instructional settings, consistent with facility policies, supervision systems, and safety expectations.

8.0.2.5.1 — Instructor Competency Demonstration

Requiring QUALIFIED SWIM INSTRUCTORS to demonstrate COMPETENCY prior to independently leading instruction helps ensure readiness to manage participants, apply safety practices, and coordinate effectively with QUALIFIED LIFEGUARDS. These demonstrations are most effective when conducted as part of hands-on, scenario-based training during onboarding or shadowing, where instructors can apply skills in conditions that reflect actual program delivery.

COMPETENCY areas such as emergency communication, participant grouping and supervision, equipment use, and safe entry and exit procedures are directly tied to participant safety and instructional effectiveness. Verifying these skills in the facility environment ensures that instructors can adapt their training to local conditions, including water features, class structures, and supervision systems. Demonstrated ability to coordinate with QUALIFIED LIFEGUARDS during Emergency Action Plan (EAP) activation further reinforces role clarity and supports a coordinated response during emergencies.

8.0.2.5.2 — Instructor Competency Documentation

Documenting instructor COMPETENCY verification supports accountability, consistency, and program oversight. Recording the completion of COMPETENCY demonstrations—whether during pre-service, onboarding, or shadowing—provides evidence that instructors have met facility-specific expectations prior to independent teaching.

Documentation processes also support quality assurance by allowing supervisors to track instructor readiness, identify training needs, and ensure alignment with organizational policies. Maintaining clear records of COMPETENCY evaluations contributes to a continuous improvement approach and helps ensure that only individuals who have demonstrated the ability to safely apply required skills are assigned instructional responsibilities.

MAHC References

¹Brenner, R.A., Taneja, G.S., Haynie, D.L., et al. Association Between Swimming Lessons and Drowning in Childhood: A Case-Control Study. Archives of Pediatrics & Adolescent Medicine. 2009;163(3):203–210.

²Fact Sheet # 60: Application of the Federal Child Labor Provisions of the Fair Labor Standards Act (FLSA) to the Employment of QUALIFIED LIFEGUARDS. https://www.dol.gov/agencies/whd/fact-sheets/60-child-labor-QUALIFIED_QUALIFIED_LIFEGUARDS