

Dear Chair Anderson and Vice Chair Mitchoff:

My name is Liz Claytor, and I am the owner of Splash Swim School, a learn to swim and water safety program, with commercial facilities in San Ramon and Walnut Creek, California. We provide year-round, indoor swim lessons to children, ages six months and up, and we have taught thousands of children to swim since we opened for lessons in 2006.

I am writing regarding Contra Costa County Health Services' Updated Frequently Asked Questions – 5/5; <https://www.coronavirus.cchealth.org/frequently-asked-questions> (the "FAQs"). Specifically, the following two FAQs under the heading of Caretaking and Education:

Will summer camps for children be allowed to operate?

Yes, but they should follow our guidelines for other types of childcare settings. We recommend that children be in the same camp (with the same fixed cohort of 12 children or less) for at least four weeks at a time, and not switch camps every week. Click to view the Guidance for Modified Childcare During COVID-19 Pandemic.

Are swimming and contact sports allowed in a camp?

Swimming, use of shared equipment and close contact like in contact sports (including gymnastics) are allowed during a child/youth educational or recreational activity if the rules regarding stable groups of 12 or fewer children contained in the health order are followed. Cohorts of the same 12 people at a camp or on a team can swim as long as they function like a camp. They cannot compete with other teams or have members who come and go from one group to another...

At Splash, our primary mission, along with the swim school industry as a whole, is to educate children in the areas of life-saving swim skills and water safety awareness. This mission is especially critical in Contra Costa County where there are swimming pools and bodies of water everywhere.

Drowning is the number one cause of death for children ages 1-4, and a leading cause for kids up to 14 years oldⁱ. In California alone, we average 51 deaths each year of children under four due to drowningⁱⁱ, and the CDC believes that for every child who dies from drowning, another five receive emergency care for near drowningⁱⁱⁱ. The most tragic thing of all is that drowning is preventable. We know that swim lessons add an important layer of protection, and the NIH has found that formal swim lessons decrease the risk of drowning for young children by 88%^{iv}. May is National Water Safety Month, and as the current shelter order stands, this will be the first time in nearly 15 years that Splash will not be able to practice this message with our children. Water safety and drowning prevention is our passion and life's work, and we need to get back to it.

We believe this to be more true than ever in the face of the COVID-19 pandemic. This has been a very uncertain time for a number of reasons, but what is certain is that our children are more at risk than ever. Shelter in place orders mean that children now have an abundance of time to find bodies of water both in and out of the home, and we know that all it takes is a couple of inches^v. Compounding the problem, parents now have a whole host of added distractions, such

as managing a full-time household, being forced into the role of a homeschool teacher, trying to telework and/or restructuring to survive in the face of unemployment. Any of these distractions alone is enough to create opportunity for a child to get to water unsupervised.

Given the life-saving nature of our business, Splash respectfully requests that it be allowed to teach swim lessons under the category of summer camps for children with the same fixed cohorts of 12 children or less in accordance with the FAQs.

If allowed to resume operations, Splash is prepared to adopt various mitigation measures to protect our children, parents and staff. We are willing to engage in a science-based dialogue with health officials regarding which measures might be appropriate for our industry.

Lastly, guidance issued by the CDC suggests that chlorine kills the virus that causes COVID-19, and there is no evidence that the virus can be spread through pools^{vi}. By working in properly chlorinated water, a swim school environment may be safer from COVID-19 than other business environments where critical work surfaces and equipment are not in constant contact with a disinfecting substance.

In closing, we believe there is currently a void in services crucial to the safety of the children in our communities, and we appreciate your consideration that we be permitted to resume teaching these crucial life-saving swimming skills. I am available to discuss further at your convenience. Thank you in advance for your consideration.

Sincerely,

Liz Claytor
President & CFO
Splash Swim School, Inc.

ⁱ "Drowning Prevention Toolkit - AAP.org." <https://www.aap.org/en-us/about-the-aap/aap-press-room/campaigns/drowning-prevention/Pages/default.aspx>. Accessed 28 Apr. 2020.

ⁱⁱ "2019 Drowning Prevention Message From Governor Gavin" <https://www.dds.ca.gov/wp-content/uploads/2019/05/2019-Drowning-Prevention-Message-From-Governor-Gavin-Newsom.pdf>. Accessed 28 Apr. 2020.

ⁱⁱⁱ "Unintentional Drowning: Get the Facts | Home and ... - CDC." <https://www.cdc.gov/homeandrecreationalafety/water-safety/waterinjuries-factsheet.html>. Accessed 28 Apr. 2020.

^{iv} "Association Between Swimming Lessons and Drowning in" <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4151293/>. Accessed 29 Apr. 2020.

^v "Water Safety (for Parents) - Nemours KidsHealth." <https://kidshealth.org/en/parents/water-safety.html>. Accessed 29 Apr. 2020.

^{vi} "Water and COVID-19 FAQs | CDC." 23 Apr. 2020, <https://www.cdc.gov/coronavirus/2019-ncov/php/water.html>. Accessed 28 Apr. 2020.