CONSUM	NEW JERSEY DEPARTMENT OF HEALTH CONSUMER, ENVIRONMENTAL AND OCCUPATIONAL HEALTH SERVICE PUBLIC HEALTH FOOD PROTECTION PROGRAM P.O. BOX 369, TRENTON NJ 08625-0369 609-826-4935 youth.camps@doh.nj.gov								REPORT OF INSPECTION Youth Camp Safety Standard Assignment No. 19199					
CAMP ID					ijigi	<u></u>		AC	τινιτ	Υ ΤΥΡΕ				
1368	1368KumSung Youth Camp									SATIS	FACTORY			
CAMP OWN	ER					PHON	e nume	BER		E-MAI	L			
John Down	ning					732-3	41-880)0		info@	ykur	nsungka	trate.com	
STREET AD	DRESS					CITY				ZIP		COUNT	Y	
950 Hoope	ber Avenue				Toms	River			08753 Ocean					
MAILING AD	DRESS					CHAN	GES					PREVIO	US INFORM	TION
CAMP DIRE	CTOR NAME			HEALT	h dii	RECTOR	R NAME			FOOD	SER		NDOR	
Charhee Y	oon			Elizab	eth]	Ferrise				n/a				
INSPECTOR	NAME				RE	EHS LIC	•			REINS	PEC	TION ON	OR AFTER	
Ellie Ginsb	erg				B	-17397	0							
	Тіме/Аст	IVITY REPORT (1-Tra	AVEL, 2-I N	ISPEC	TION, 3-A	Administi	RATIO	N, 4-1	PERSONA	L)	TOTAL HO	urs: 3.5	
DATE	CODE	BEGIN	E	END	С	ODE	BEG	iN		END	(CODE	BEGIN	END
8/16/23	1	1030	1	100		2	110)0		1230		1	1230	1300
	3	1300	1	400										

#	N.J.A.C. 8:25		IN	OUT	Severity	cos	N/A	N/O
		ADMINISTRATIVE						
1.	2.1	Camp has a current certificate of approval (camp license) from the NJDOH.	\boxtimes					
Con	nments:							
2.	DFD	If accepting children under 2.5 years of age – the facility is licensed by the NJ Dept. of Children and Families Office of Licensing.					\boxtimes	
Con	Comments:							
3.	3. Is the camp enrolled in the Division of Family Development (DFD)/Child Care Resource & Referral Agency (CCR&R) Childcare Subsidy Program?				S 🗌	NO 🖂		
Con	nments:							
4.	2.5	Camp has obtained liability insurance in an amount consistent with the expected risks.	\square					
Con	nments:							
		GENERAL CARE OF CAMPERS						
5.	3.1(a)	Discipline policies and practices are stated in writing. Camp staff are prohibited from taking means of corporal punishment toward children.	\boxtimes					

# N.J. 8:	C. 5	IN	OUT	Severity	COS	N/A	N/O
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Con	nments:							
		STAFF						
6.	3.2(c)	Staff pre-season orientation and training has been conducted and documented. At minimum, the following has been included in the orientation: personnel policies and practices, job descriptions, disciplinary policies, basic principles of emergency first aid, blood-borne pathogens, infection control, and hand washing, emergency procedures, daily health surveillance procedures, lost camper and lost swimmer policies.			Minor			
	nments: or sumented b		ed are	e availa	able, howe	ver not	tsigne	ed/
7.	DFD	Age-appropriate pediatric first aid and Cardiopulmonary Resuscitation (CPR) training and required health and safety child growth development coursework has been completed and documented for caregivers, teachers, and directors, and any individuals responsible for the direct care/ supervision of children for a provider that receives DFD funds.						
Con	nments:							
8.	3.1(c)	Camp staff, with reason to believe a camper is being abused, have been advised to immediately report observations to Department of Children and Families hotline at (877)-652- 2873.						
Con	Comments:							
9.	3.2(d)2	Camp has developed and implemented staff training on issues related to child abuse and neglect, such as, but not limited to, understanding the staff members' responsibilities, reporting, recognition and observation of campers.						
		mp staff complete the "School age youth programs: health	and s	afety l	best practio	ces from	m Per	n
Stat	te extensio	on "Better kid care program.						
	1	STAFF BACKGROUND CHECK						
10.	DFD	Federal Bureau of Investigation (FBI) criminal history (fingerprint check), National Sex Offender Registry (NSOR), State criminal history (fingerprint check), and State Sex Offender Registry completed for all staff members. This check also includes Out-of-State State criminal history and Out-of- State Sex Offender Registry for any staff that have lived out of state within the past five years. (<i>Only for DFD Camps</i>)		YI	ES 🗌	NO		
Con	nments:							
11.		Child Abuse Record Information (CARI) check has been conducted including Out-of-State child abuse registry checks for any staff that have lived out-of-state within the past five years (applicable to all staff and volunteer members of a provider that receives DFD funds)		YI	ES 🗌	NO		
Con	Comments:							
12 .	3.2(j)	Criminal History Name Check has been conducted/completed for all adult (ages 18+) staff member.	\square					
Con	Comments:							

#	N.J.A.C. 8:25		IN	OUT	Severity	cos	N/A	N/O
13.	3.2(k)2	Written and notarized statement, provided by continuously employed or returning adult staff, indicating that there has been no change in criminal history status since the criminal history name check was conducted is maintained by the camp operator.	\boxtimes					
Con	nments:		1				1	
14.	3.2(I)	Sex offender registry check conducted annually for all staff 16 and older.						
Con	nments:							
		CAMP ACTIVITIES						
15.	3.2(n)	High-risk activities are conducted by a qualified adult activity specialist (18 years of age and older).	\square					
Con	nments: sw	vimming, lifeguard cert American REd Cross, Rohan Kumar	r exp	ires 6/2	12/2024			
		SUPERVISION OF CAMPERS						
16.	3.2(o)	Camp supervision ratios are observed for <u>ages 5-17</u> : 1 adult: 1 counselor: 20 campers? (<i>Note: each additional group of 10 campers requires at least one additional staff</i>)						
Con	nments:		1					
		Camp supervision ratios are observed for ages 2 1/2 -4: 1						
17.	3.2(p)	adult: 1 counselor: 14 campers? (Note: each additional group of 7 campers requires at least one additional staff)						
Con	nments:							
18.	3.2(q)	Camp supervision ratios are observed for <u>ages birth to 2:</u> 1 adult: 1 counselor: 8 campers? (<i>Note: each additional group</i> of 4 campers requires at least one additional staff)					\boxtimes	
Con	nments:							
		SITE AND BUILDINGS						
19.	4.1(a)	Location does not present fire, health and safety hazards. All hazardous areas, bodies of water, and vehicular traffic areas are guarded or fenced off and warning signs are posted.	\boxtimes					
Con	nments:							
20.	4.2(a)	All structures and facilities are in compliance with local building, zoning and health codes and ordinances; further letters of approval or a certificate of occupancy (CO) issued by the local authority has been received.						
Con	nments:							
21.	13.2	Buildings are in compliance with the requirements of the New Jersey Uniform Construction Code, N.J.A.C. 5:23 and the New Jersey Uniform Fire Code, N.J.A.C. 5:70, as applicable.						
Con	nments:							
22.	14.1(c)	Shelter, which may be temporary (ex: canopy or tent) shall be provided in case of inclement weather at a single sport youth camp (SSYC)					\boxtimes	
Con	nments:							
23.	4.4	Power and or other hazardous equipment stored on-site are adequately protected and out of the reach of potential curious campers.	\boxtimes					
Con	nments:							
		HEALTH						

#	N.J.A.C. 8:25		IN	OUT	Severity	cos	N/A	N/O
	T		1		-		1	
24.	5.2(b)	Health Director at a <u>day camp</u> is on duty at all times and certified in standard-level First Aid from a certification agency <u>approved by the Department.</u>	\square					
Com	nments: all	counselors are cpr certified with two as BLS provider						
25.	5.2(a)	 Health Director, <u>at a resident camp</u>, is on duty at all times and holds <u>at least one</u> of the following certifications: a. Physician licensed in New Jersey b. Registered nurse licensed in New Jersey c. Certified athletic trainer by the <u>Board of Certification</u> d. Individual certified in either <u>one</u> of these certifications 1. Advanced Level F/A 2. Paramedic 3. EMT 4. First Responder/CIM 						
Com	ments:	· · ·						
26.	5.2(c)	Health Director is certified in <i>professional-level</i> infant, child, and adult cardiopulmonary resuscitation (CPR) from a certification agency <u>approved by the Department</u> .	\boxtimes					
Com	ments: BI	_S provider, expires 4/2024						
27.	5.1(d)	A written procedure for routine daily surveillance of campers and staff has been established. (Note: this check can be conducted as a roll call activity; should be an activity that alerts the staff member of bruises, illness, etc. Any signs of child abuse should be reported)	\boxtimes					
Com	ments:							
28.	5.1(d)2	Health Director has developed a system (forms, logs) for documenting all obvious and unusual observations made during the daily health surveillance and communicating suspected and/or confirmed illness of a camper to parents ASAP.	\boxtimes					
Com	nments:							
29.	5.3(b)	Health director has established written medical policies and procedures on the treatment of illness and injury and the administration of non-Rx drugs.					\boxtimes	
Com	nments:							
30.	5.5(b)	Written health histories for each staff/camper are maintained on file.	\square					
Com	iments:		T	-			n	n
31 .	5.5(g) ments:	Campers' immunization records and/or religious exemptions are maintained on file.	\square					
	_							
32.	DFD	Families (including foster families) of children in foster care and homeless children are permitted a 30-day grace period to take any necessary action to comply with immunization requirements consistent with the provisions of N.J.A.C. 3A:52- 7.3 and N.J.A.C. 3A:54-6.8. (For DFD Funded Families)		YE	ES 🗌	NO		
Com	iments:						I	1
33.	5.4(b)	Minimum first aid supplies set forth in Appendix E "Health Center Supplies" are maintained.		\square	Minor	\boxtimes		

#	N.J.A.C. 8:25		IN	OUT	Severity	cos	N/A	N/O
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Com	Comments: missing 5 pocket cpr masks, ordering masks at time of inspection									
34.	4.2(f)	Health center is established for the temporary isolation and treatment of sick or injured campers and/or staff members.	\square							
Com	ments:		·							
35.	5.1(b)	Written documentation for treatment and transport for campers/staff with serious injuries and/or illnesses have been organized with Emergency Medical Service (EMS) or ambulance squad.	\boxtimes							
Com	ments:									
36.	5.3(e)	Medications are labeled, stored appropriately and inaccessible to campers. Medication administration is documented to include the child's name, time and initials of the person administering the medication.								
Com	ments:									
37.	DFD	Medication is administered consistent with standards for parental consent. (for DFD funded camps)		YE	S 🗌	NO				
Com	ments:									
38.	DFD	The camp ensures staff are trained and prepared to prevent, recognize, and respond to emergencies due to food-related allergies and other allergic reactions.		YE	S 🗌	NO				
Com	ments:									
		SAFETY								
39.	6.1(a)	Written emergency procedures address, at a minimum, evacuation of camp, plan for lockdown, shelter in place, fires, natural disasters, serious accidents, illness or injury, and lost camper(s).	\square							
Com	ments:									
40.	DFD	Written emergency procedures address relocation, communication and reunification with parents, continuity of operations, accommodations for children with disabilities and children with chronic medical conditions during an emergency.		YE	S 🗌	NO				
Com	ments:									
41.	6.1(b)	Fire and emergency drills are conducted at least once a camp period or every two weeks, whichever is more frequent.	\square							
Com	ments:									
42.	DFD	Hazardous materials are handled and stored appropriately. Bio-contaminants are properly disposed of.		YE	:S 🗌	NO				
Com	ments:									
43.	6.1(c)	Emergency phone numbers be provided and posted at a minimum in the main office, the health center, and waterfront area, if applicable.								
Com	ments:									
44.	6.3(a)	Fire extinguishers meet the requirements of the Fire Underwriters Association and are strategically placed so that they are easily accessible.	\square							
Com	ments:									
45.	7.2(b)	Policy and procedure for safety evacuation drills (bus/fire) performed by campers and staff which indicate the frequency of such activity.	\square							

Com	ments:								
46.	6.4(a)	Documented certification of compliance with all local and State fire codes and rules.	\boxtimes						
Com	ments:								
47.	6.4	Smoke detectors are operable, checked and in good working order where applicable.	\square						
Com	ments:								
48.	DFD	The camp operator has developed and documented an emergency preparedness procedure that covers continuity of operations, staff and volunteer training in the event of an emergency.							
Com	ments:								
		NUTRITION AND MEAL SERVICE							
49.	7.1(a)	Foods and food service conform to the Sanitation in Retail Food Establishments and Food and Beverage Vending Machines, N.J.A.C. 8:24.					\boxtimes		
Com	ments:								
		POTABLE WATER							
50.	7.2(a)	Potable water supply meets the New Jersey Safe Drinking Water Act, N.J.S.A. 58:12A-1 et seq. regarding construction, operation, and water quality (<i>Note: Ex. of appropriate</i> <i>documentation could be a water bill or water testing</i> <i>documentation</i>)	\boxtimes						
Com	ments:								
51.	7.2(b)	Camp that is open for less than a calendar quarter every year has provided evidence of a water bacteriological and nitrate analysis deemed satisfactory by the standards of New Jersey Safe Drinking Water Act, <i>N.J.S.A.</i> 58:12A-1 et seq. prior to opening for the season.	\boxtimes						
Com	ments:								
52.	7.3	Water sampling results are maintained on site and available for review.	\square						
Com	ments:								
		TRANSPORTATION	r - r						
53.	8.1	Transport vehicles conform to the requirements of Motor Vehicles and Traffic Regulation, N.J.S.A. 39:1-1 et seq., and the Motor Vehicle Commission rules promulgated thereunder at N.J.A.C. 13:21 and have been inspected and maintains a sticker of inspection by the <u>MVC School Bus Safety Team</u> .	\boxtimes						
Com	ments: cen	tral regional school district bussing							
54.	8.2(b)	Written policy has been established for transportation.	\square						
Com	ments:								
55.	8.3	Youth camp, person(s), or agency which provides transportation for campers maintains vehicle liability insurance.	\bowtie						
Com	ments:								

#	N.J.A.C. 8:25		IN	OUT	Severity	cos	N/A	N/O
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56.	8.4	 The following records are maintained: Transportation routes; Names of the campers being transported; The name and address of the driver; A photo static copy of his or her valid school bus driver license; If a contractor is used to provide transportation services, the name and address of the contractor. 	\boxtimes					
Com	iments:							<u> </u>
57 .	8.4(b)	Drivers are appropriately licensed for the vehicle being driven to transport campers.	\square					
Con	intents.							
		SPORTS AND OTHER RECREATIONAL ACT	ΓΙνιτι	ES	[1
58.	3.2(n)	Policy documenting that high risk activities are conducted by staff knowledgeable of measures used to ensure the safety of participants; if the activity is specialized documentation should be available of the most recent guidelines of the safe execution of such specialized activity; specialized high risk activities should be overseen by an activity specialist.	\boxtimes					
Corr	nments: life	e guard for swimming						
59.	9.1(a)	Swimming pools and bathing beaches, used by camp, conform to the Public Recreational Bathing rules, N.J.A.C. 8:26.	\boxtimes					
Com	nments: Oc	ean County Health Department June 14 2023						
60.	9.2(f)	Policy documenting <u>off-site</u> swimming activities require prior notification of arrival to the operator of the public recreational bathing facility. Policies and procedures for the monitoring of campers and swimmer ability assessment during <u>off-site</u> swimming is documented. (<i>Note: if no, please indicate</i> <i>which part of the question is not in compliance</i>)					\boxtimes	
Com	iments:							
61.	9.2(g)	Written policies and procedures are maintained for lifeguarding, monitoring and supervision, swimming ability assessment and waterfront activities for <u>on-site</u> swimming activities.	\boxtimes					
Corr	nments:							
62.	9.4(b)	On-site waterfront activities are equip with inherently buoyant Type I,II,III or V personal flotation devices that are in good repair, varied sizes and in quantities sufficient for each staff and camper. (Note: Inquire about how many will be allowed to participate in a waterfront activity at a time. Use the count as a gauge of sufficient quantity)						
Corr	iments:							
63.	9.4(c)	A lifeboat or rescue craft is observed for use during <u>on-site</u> waterfront activities. Accompanying safety equipment (rescue ring with 25 ft. of rope)					\boxtimes	
Corr	nments:						1	T
64.	9.2(a)	Lifeguards are certified by an agency <u>approved by the</u> <u>Department.</u>	\boxtimes					
Com	nments:							

#	N.J.A.C. 8:25		IN	OUT	Severity	cos	N/A	N/O			
65.	9.3(d)	A system of supervising and monitoring bathers consistent with a buddy check to ensure bather safety has been documented and implemented.									
Corr	ments:										
	MAINTENANCE AND SANITATION										
66.	13.5(a)	Camp and recreational equipment evaluated and documented to be maintained in a clean, safe, and sanitary condition weekly.	\square								
Corr	iments:	woony.									
67.	13.5(a)	Recreational equipment is maintained in safe operating condition.	\boxtimes								
Corr	ments:										
68.	13.5(a)	Safety inspection of recreational equipment, including playground, is established and a way of documenting the weekly inspection has been developed.	\boxtimes								
Com	nments:										
-		INSECT, RODENT, AND WEED CONTR	OL								
69.	13.3(a)	Mosquito breeding is controlled by keeping the grounds free of cans, jars, buckets, old tires, and other articles, which may hold water.	\boxtimes								
Corr	Comments: L&D exterminating LLC, treats weekly for prevention										
70.	13.3(b)	Fly breeding is controlled by eliminating unsanitary practices. Every door, window, or other opening to the outside, which is used for ventilation, is outfitted with a screen of at least 16 mesh.	\boxtimes								
Com	ments:		•								
71.	13.3(c)	All enclosed buildings are maintained so as to eliminate rodent harborage, including buildings where food is stored or served.									
Com	nments:										
72.	13.3(d)	Weed growth is controlled along pathways and within each campsite to reduce tick and chigger populations.									
Corr	nments:										
		ADDITIONAL PROVISIONS									
73.	11.1(a)	Buildings housing showers are adequately constructed, in good repair, clean and have adequate lighting and ventilation.					\square				
Corr	nments:										
74.	12.1(a)	Operators have made adequate arrangements for the storage, collection and disposal of solid waste. Receptacles are observed onsite, centrally located for anticipated activities and in sufficient supply and frequency to address anticipated number of campers and staff over the period of operation.									
Corr	nments:										
75.	13.4	Living quarters, mess halls and/or kitchens are not located within 100 feet of housing for farm animals.					\boxtimes				
Com	nments:										

#	N.J.A.C. 8:25		IN	OUT	Severity	cos	N/A	N/O
		Comp activities being conducted on site a form or any appear						
76.	13.4 (a-e)	Camp activities being conducted on site a farm or any space where campers may come into routine contact with farm animals have documented the policies and procedures to minimize the potential of illness and injury.					\boxtimes	
Comments:								

ASSESSMENT QUESTIONS							
77.	Has staff with supervisory authority responsibilities for children completed the Division of Family Development's pre-service health and safety trainings as required?		YES 🖂	NO 🗌			
Comments:							
78.	 Is the camp director aware that on or before September 15, of each year, the camp director shall submit an 'Accident Annual Report Youth Camp Safety' (<u>CB-15</u>) form via Mail or email to the Department at: <u>youth.camps@doh.nj.gov</u> 			ΝΟ			
Comments:							
79.	Has your camp implemented COVID-19 mitigation measures? If yes, which COVID-19 mitigation measures were implemented? (Ex: masking, social distancing, handwashing, testing)		YES 🗌	NO 🖂			
Comments: implemented during covid, no longer in use							
Remarks							
Name of Inspecting Official		Name of the Person Receiving Copy of Report					
Ellie Ginsberg		Charhee Yoon via email					

Youth Camps Waterfront Activities Inspection Form

N.J.A.C. 8:25 Youth Camp Safety Standards Evaluation youth camp waterfront standards (Subchapter 9 Waterfront Safety)

Instructions for completing the form: Please complete the assessment form while swimming activities are actively being conducted on site a youth camp and/or childcare center. If waterfront activities are not active during the time of inspection either wait or revisit the noted facility without prearranging a return with the camp operators. This assessment form is designed to ensure swimming activities are in line with the requirements.

Please provide responses to each of questions 1-13. Questions 14-17 only require responses if the youth camp's on-site activities include watercraft activities.

Which of the following is the facility:
 a. Licensed Youth Camp

a.	Licensed Youth Camp	CAMP ID:1358	
b.	Licensed Child Care Facility	OOL #:	

- c. Both
- d. Neither
- The waterfront facility is observed in conformance with N.J.A.C. 8:26 Public Recreational Bathing rule. (Note: operator may verify conformance by providing a copy of the facilities' most recent PRB inspection report conducted by the local health authority)
 - a. In Compliance
 - b. Out of compliance
 - c. Other please describe:_____

3. Review the lifeguards credentials. Is the person at minimum 16 years of age?

- a. In Compliance
- b. Out of Compliance
- c. Other please describe:______

4. Lifeguard personnel on site are certified (<u>Current Recognized Certifications</u>) and have appropriate documentation as verification?

- a. In Compliance
- b. Out of Compliance
- c. Other please describe:____

- 5. Have the camp operators developed a system which sections the bathing area into separate areas for non-swimmers, beginner swimmers and proficient swimmers? This practice aids in drowning prevention.
 - a. In Compliance
 - b. Out of Compliance
 - c. Other please describe:___suggestion to add better visual aid/ throw rope or more obvious colored line on pavement_____
- Are inspectional activities taking place during instructional or non instructional (open) swimming? ______no_______
- Are lifeguard supervisor(s) (age 18+) in attendance for <u>non-instructional</u> (open) swimming and watercraft activities?
 - a. In Compliance
 - b. Out of Compliance
 - c. Other please describe: ______
- Do supervision ratios for <u>non-instructional</u> (open) swimming/waterfront activities include one
 (1) lifeguard supervisor (age 18+) and one (1) lifeguard (age 16+) for 30 or fewer campers?
 (Note: one additional lifeguard on duty for every additional 30 campers or portion thereof)
 - a. In Compliance
 - b. Out of Compliance
 - c. Other please describe: ______
- Are instructional swimming/waterfront activities supervised by either: one (1) lifeguard (age 16+) and two adults OR one (1) lifeguard supervisor (age 18+) and two (2) counselors when there are 30 or fewer campers in the water? (Note: one additional lifeguard is required for every additional 30 campers or portion thereof)
 - a. In Compliance
 - b. Out of Compliance
 - c. Other please describe: ______
- 10. Has management developed a system to assess and classify a swimmer's ability (non-swimmer, beginner swimmer, swimmer)?
 - a. In Compliance
 - b. Out of Compliance
 - c. Other please describe: ______

- 11. Do operators utilize the following criteria to classify a camper as a swimmer:
 - a. Camper has demonstrated the ability to jump feet first into water over their head and come back to surface
 - b. Camper has demonstrated the ability to swim 25 ft. and change directions using different strokes
 - c. Camper has demonstrated the ability swim an additional 25 ft., stop and float or tread water for one (1) minute

i. In Compliance

- ii. Out of Compliance
- iii. Other please describe: ______
- 12. Are those in the water observed swimming in an area identified by the lifeguard (s) on duty as commensurate with their swimming ability?

a. In Compliance

- b. Out of Compliance
- c. Other please describe: ______
- 13. Has a buddy check system has been developed and is observed to be conducted at least every 10 minutes?
 - a. In Compliance
 - b. Out of Compliance
 - c. Other please describe: _____
- 14. The facility has developed a written swimmer plan which is observed and details the roles and responsibilities of staff in the case of a waterfront emergency and the frequency of the lost swimmer drill?
 - a. In Compliance
 - b. Out of Compliance
 - c. Other please describe: ______
- 15. Do the camp's waterfront activities include any watercraft (boating, kayaking, surfing etc.) activities?
 - a. Yes (if yes, answer questions 15-18)
 - b. No (if no you do not need to answer any further questions)
 - c. Other please describe: _____

- 16. Are supervisors of watercraft activities appropriately trained? (**Note:** verbal confirmation from a watercraft supervisor would be sufficient as verification of skill and experience)
 - a. In Compliance
 - b. Out of Compliance
 - c. Other please describe: ______

17. Are personal floatation devices worn by the occupant of a watercraft?

- a. In Compliance
- b. Out of Compliance
- c. Other please describe: ______
- 18. During watercraft activities, were a lifeguard in a lifeboat or rescue craft on the water AND an adult (age 18+) on the shore observed for the supervision of watercraft activities?
 - a. In Compliance
 - b. Out of Compliance
 - c. Other please describe: _____
- 19. Are lifeboat and/or rescue craft equipped with a rescue ring or similar tube attached to 25 ft of rope for the safe recovery of those in distress?
 - a. In Compliance
 - b. Out of Compliance
 - c. Other please describe: ______