

NCAP Circular No. 17

NCAP elevates camps to new levels of excellence...

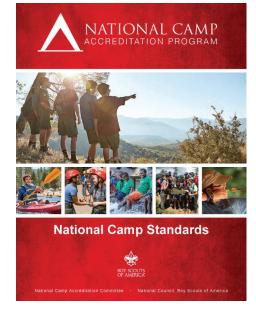
National Council, Boy Scouts of America

February 1, 2023

NCAP Announces 2023 Standards Revisions

Each year the National Camp Accreditation Committee reviews the National Camp Standards to determine if any changes should be made to simplify them, enhance program or safety, or address new issues. Changes to the National Camp Standards originate in several ways. The most common are changes resulting from new BSA youth protection, safety or administrative standards with which NCAP must comply as part of the National Council. Other changes are recommended to the committee by Outdoor Programs subcommittees with subject matter expertise in the various outdoor adventures and activities covered by the National Camp Standards. Some changes in NCAP program administration are initiated by NCAP to simplify the process or clarify coverage. Finally, NCAP receives comments from the field on areas where improvements could be made.

Proposed changes are reviewed by the NCAP standards team, National outdoor programs staff, and NCAP leadership. Significant changes are circulated to the National Council's Health and Safety team, Outdoor Programs subcommittees, risk management, legal and related entities. After all changes are reviewed and comments received from the reviewers, the standards team reviews the comments and proposed changes, determines which are worthy of adoption, and prepares a recommendation to the National Camp Accreditation Committee. The full committee reviews the standards, amends them as necessary, and then adopts any necessary changes.



The 2023 edition of the BSA's National Camp Standards sports a red cover and is available at https://pdscouting.wpenginepowered.com/wp-content/uploads/2022/12/2023-NCAP-Standards-430-056-web.pdf

NCAP Circular No. 17 presents the results of this deliberative process resulting in changes to the National Camp Standards taking effect in 2023. Starting on page 3, a Section-by-Section review of the 2023 Standards changes is presented that sets forth the changes using underline for new and changed text and strikeout to show deleted material. After the text of each standard is presented, a brief explanation is presented as to why the change is made and provides guidance on proper interpretation of the standard.

In addition to the standards changes, page 2 of the NCAP Circular presents a discussion of the scoring system and how "upgraded from noncompliant" ("UNC") and deviations are used to assess accreditation status. Please review this page to understand the scoring system and its potential implications for camps.

Clarification of Trained Belayer

NCAP wishes to clarify, after discussion with the National COPE and Climbing subcommittee, that in the Interpretation to Standard PS-206, when it states "using trained belayers to belay with an assisted braking device or assisted braking hitch is allowed." it should be interpreted as follows: "Trained" means that the individual is trained on that specific type of device being used. COPE and Climbing Instructor and Director training should include instruction in the use of assisted braking devices or assisted braking hitches so that if a situation arises with insufficient space, staff, or participants for a backup belayer, the staff are proficient in the use of these devices or hitches.

In short: when camps may need to use such devices, they should arrange for appropriate training in the use of the specific devices that they will use.

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Understanding and Using the "Upgraded from Noncompliant" Score

Camps and assessment teams have requested additional guidance on the new "upgraded from noncompliant" ("UNC") score, how it should be used and how it differs from a deviation.

Non-Discretionary Aspect

A UNC score is issued when a camp corrects a noncompliant finding with a standard, term or condition of its Authorization to Operate (including a commitment), currently effective variance or a current waiver (although a camp can always comply with the original condition for which it received a waiver). NCAP recognizes that the camp may be able to quickly correct the noncompliant condition and return the camp to compliance. NCAP does not wish to unduly penalize a camp for an inadvertent oversight. NCAP therefore created the UNC score which allows the assessment team to acknowledge the correction (1) if completed while the team is at the camp or (2) under a corrective action plan approved by the National NCAP Staff Advisor.

Discretionary Aspect

On the other hand, NCAP does

NCAP Circular No. 17

PUBLICATION OF THE NATIONAL CAMP ACCREDITATION PROGRAM BOY SCOUTS OF AMERICA

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Published for the use and guidance of BSA camping and camp accreditation personnel.

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What the Standards say:

Deviation. A standard, authorization term or commitment, variance, or waiver is scored as a "deviation" if the exact terms are not met, but the facility has met the substantial intent of the standard, authorization term or commitment, variance, or waiver with adequate levels of safety and quality. Deviations are particularly appropriate where the camp property or camp has incidentally missed an item, but other aspects of the camp suggest that the camp's program is generally in good shape. An example might be a single incidence of a dead battery or a single missing utility cut-off drawing. Multiple instances, which suggest a systemic problem, should be scored noncompliant.

Upgraded from noncompliant. A standard, initially scored as noncompliant, is corrected by the camp prior to the departure of the assessment team to the assessment team's satisfaction. If the deficiency cannot be corrected prior to departure, but the camp has a corrective action plan approved by National NCAP staff advisor, this score may also be used.

Standards Manual, page 11

not wish to encourage such oversights. Therefore, assessment teams retain discretion to conditionally accredit a camp when there is a UNC score. NCAP anticipates that assessment teams will conditionally accredit when the camp has a history of failing to fully meet the particular standard (e.g., past UNCs or deviations for the same standard), when the violation was particularly egregious (e.g., an imminent life safety issue), or when the combined number of UNCs and deviations suggest poor performance

UNC versus Deviation.

A UNC differs from a deviation as follows: prior to the corrective action taken by the camp during or after the assessment, the camp was noncompliant with the standard. For a deviation to be issued, the camp must have been "compliant" prior to any corrective action that it took while the

assessment team was present. Thus, the touchstone for use of a UNC is whether the camp was noncompliant prior to correction.

Some standards, such as FA-703, Fire Protection, often have a single incident or two of an expired fire extinguisher. That would, in appropriate circumstances, be a deviation. More frequent misses or a particularly egregious one (e.g., no inspection by a qualified person in a camp kitchen with deep fat fryers and a commercial hood fire suppression system) may require a noncompliant finding. A noncompliant that is corrected becomes a UNC; a deviation that is corrected remains a deviation.

For both deviations and UNCs, the problem area should be identified on the score sheet. For UNCs the correction also should be identified.

The National NCAP committee has approved the following changes to the National Camp Standards effective January 1, 2022. Many of these changes reflect the BSA reorganization in 2021; others reflect efforts to simplify or clarify the operation of the national camp standards. Additions to the standards are <u>underlined</u>; deletions are <u>struckthrough</u>, and explanatory notes are in *italics*.

Questions on these changes should be directed to Eric Hiser, National Standards Chair, at ehiser.BSA@gmail.com or Brian Gray, NCAP staff advisor, at Brian. Gray@scouting.org.

Front Matter—The Accreditation Decision

Revise Accredited #2 as follows:

2. A camp may be accredited if it has one "upgraded from noncompliant" (UNC) score in accordance with Standard SA-004 and has four-five or fewer deviations and UNC findings or if it has 2 UNC scores and no deviations.

Revise Conditionally Accredited #2 as follows:

2. More than 10 standards, terms, conditions, or commitments are scored "upgraded from noncompliant" or "deviation," with any "upgraded from noncompliant" being counted as equivalent to 5 deviations.

Rationale for the changes

There is a current inconsistency in the NCAP Standards Manual on how "upgraded from noncompliant" or UNC scores are handled with deviations. The intended approach is that a camp can have 2 UNCs and no other deviations; 1 UNC and from 0-5 deviations.

or no UNCs and from 0-10 deviations. In essence, a UNC is being treated a the equivalent to five deviations. The rationale is that at the time of the assessment, the camp was noncompliant with the National Camp Standards, which is a more serious case than a deviation from the requirements, even if corrected during the assessment.

The **boldfaced and underlined text** was inadvertently omitted from the Standards Manual and will appear in the 2024 edition.

SA-001 National Camp Standards Applicability

STANDARD:

The BSA National Camp Standards apply to any BSA-branded camp property or camp. All camp properties and camps, regardless of type, must comply with the standards applicable to the facilities and programs offered. When applicable, at camp properties and camps, the National Camp Standards take precedence over other National, National Service Territory, or local council policy or requirements except as provided herein.

Add new Specific Requirement D as follows:

D. Precedence. At camp properties and camps, the National Camp Standards take precedence over inconsistent statements in other BSA policy statements, manuals and guides, regardless of whether issued at the national or local council level, except in the following circumstances:

- 1. The National Camp Accreditation Committee issues an NCAP Circular that states it supersedes certain sections of the National Camp Standards.
- 2. The National Camp Accreditation Committee issues a variance, waiver, equivalency determination or other relief in accordance with Standard SA-005, which is binding upon the parties covered.
- 3. The National Camp Standards expressly reference and adopt another policy, manual or similar document, such as the Guide to Safe Scouting, as controlling for certain issues. Additionally, the National Camp Standards explicitly allow councils and camps to adopt more stringent requirements. Where a council or camp exercises that authority, the more stringent requirement prevails.
- 4. The National Camp Standards take precedence only over inconsistent statements in other BSA publications only at camp properties and camps. For activities not at camp properties or camps, other BSA publications provide the applicable requirements.
- 5. Notwithstanding the above, camp properties and camps must always operate in compliance with federal, state and local laws, regulations and permits. Those legal requirements prevail over inconsistent Standards. Camp properties and camps are expected to comply with both law and the Standards

to the extent consistent and possible. Councils facing this situation should apply for a variance pursuant to Standard SA-005 to eliminate inconsistency or tensions.

INTERPRETATION:

BSA council includes the National Council and its <u>service territories</u>, subdivisions and subsidiaries and any BSA-chartered local council and its <u>districts</u>, subdivisions and subsidiaries.

A long-term camp is a camp of four or more nights. A short-term camp is one to three nights. The question arises of how to distinguish them when the camp is repeated. The answer is that the total number of nights of the program using essentially the same leadership and staff and within less than five days of each are counted to determine program length. Examples:

[Revise third and fourth bullets as follows]

- The council offers a campmaster program where a varying staff offers a generally consistent program each weekend.
 Because these programs are more than five or more days apart, they are separate camps.
 This is a short-term camp.
- A Cub Scout camp is offered for four <u>or more</u> night sessions using the same program and staff. This is a long-term camp.

Rationale for the Changes:

New subsection D, precedence, is added to clarify the governing standard when there are inconsistencies in Scouting publications or between National, National Service Territory and local council requirements. Except as provided

in D. the National Camp Standards set the minimum level of performance that must be met at all BSA-branded camps and camp properties. Local councils may be more stringent but may not be less stringent. If there are changes, the National Camp Accreditation Committee will issue an NCAP Circular to inform the field of changes until the Standards are next revised. NCAP Circulars supersede inconsistent provisions of the National Camp Standards and are used to update the Standards and to provide faster response time, when necessary and appropriate.

The Interpretation of a long-term camp is revised to clarify that all nights within less than five days (e.g., 4 days, 23 hours and 59 minutes) are counted to determine whether a camp is a long-term camp. Camps separated by five or more days, as is typical of most campmaster programs, are not counted together to determine camp status.

Council is clarified to make clear that National Service Territories are part of the National Council and districts are part of the local council.

SA-003 Assessment Required

Revise A.2 as follows

2. Each COPE/climbing course shall be assessed at least annually receive a professional inspection pursuant to ANSI/ACCT Standard 03-2019, Chapter 1, Sections B.1.2 and B.2. In addition, each COPE/climbing course shall be assessed annually

by and the local council using NCAP trained personnel. These assessments should could be at separate times. The council self-assessment may be coordinated with a long-term camp assessment by the assigned zone assessment coordinator, if applicable.

Revise C.1 as follows:

- **C. Reporting.** Each assessment shall be reported as follows:
 - Camp properties <u>and</u> <u>COPE/Climbing courses</u>. A copy of each camp property assessment

INTERPRETATION:

Revise Interpretation as follows by adding at end:

Local council inspections, under specific requirement A.2, may use a mix of NCAP-trained and otherwise qualified presonnel, but the team lead must have the required NCAP training.

Revise Verification by striking the following bullet:

• Verification of compliance with AO-812

Rationale for the Changes

The revision clarifies that the ACCT inspection required is a "professional inspection" pursuant to ANSI/ACCT Standard 03-2019, Chapter 1, Sections B.1.2 and B.2. The change conforms to the governing standard and provides clarity on what is required.

Under the standard as revised, facilities compliance with the ANSI/ACCT Standard and life safety is primarily addressed by the ACCT professional inspection under Standard FA-715. The

NCAP assessments address qualifications of program staff, whether the program offered to campers matches the program documentation, and that all required operational paperwork is maintained. The NCAP assessment under Standard FA-715 also confirms that the ACCT professional inspection occurred and that the council has either addressed or is addressing all deficiencies.

The Verification is changed to drop the specific reference to AO-812. Compliance with AO-812 is specifically addressed by the program administration reporting mechanism and by the short-term camp administrator or self-assessment team noting whether an appropriate local council authorization and assessment declaration was prepared properly during the assessment of short-term camps or day camps.

SA-004 Accreditation of Camps and Camp Properties

Revise Specific Requirement B as follows:

B. **Accredited.** A camp or camp property *shall* be accredited if it receives no noncompliant findings and not more than 10 deviation findings. A camp or camp property *may* be accredited if it receives not more than one two "upgraded from noncompliant" findings or not more than two "upgraded from noncompliant" findings and no deviations if and only if:

...

3. Notwithstanding Specific Requirements B.1 and B.2,

if the total number of UNC and deviation <u>findings scores</u> exceeds 10, <u>with each UNC finding counting 5</u>, the camp or camp ...

C. Conditionally Accredited...

2. If there are more than 10 deviations or UNCs scored, with each UNC counting 5.

INTERPRETATION:

[Add new paragraph at end]

For purposes of Specific Requirements B.3 and C.2, each deviation is counted as a finding and each UNC is counted as five findings.

So, a camp with 2 deviations and 1 UNC has seven findings.

Rationale for the change:

This change is made to eliminate an inconsistency in the prior language. Essentially, a UNC is treated as the equivalent of 5 deviations. The reason for this is that at the time of assessment, the camp was noncompliant (as opposed to being in substantial compliance) and noncompliant is a more serious condition.

SA-006 NCAP Trained and Certified Personnel

Revise Specific Requirement A as follows:

A. Assessment Team Leaders
Lead Assessors. All NCAP
zone assessment team leaders lead assessors shall have completed current-year team leader lead assessor training from the National Council and hold a current NCAP assessor certification. Assessment team leaders lead assessors at a local council shall have completed assessor training from

the National Council and hold current NCAP assessor certification.

INTERPRETATION:

NCAP zone <u>assessment team</u> <u>leader</u> Lead means a zone assessment coordinator, council camp assessment chair, or the team leader of a camp assessment team at any camp.

Rationale for the change:

The change is made for consistency in terminology through NCAP.

RP-153 Adult Participant Training Opportunities

Revise Recommended Practice by striking A and renumbering:

A. Youth Protection Training

Rationale for the change:

BSA has moved its Youth Protection Training online where all members are assured a consistent, up-to-date message. Training at camp is no longer necessary and may introduce inappropriate drift.

PS-201 Aquatics: General

Revise Specific Requirement G as follows

G.All motorboats, sailboats, and watercraft are in good repair, are licensed if required, and meet U.S. Coast Guard regulations. Disposable fire extinguishers, if used, must be less than 12 years old and appropriate for the use. Council-owned boats 26 feet or greater in length and/or 40 HP or greater must be registered with Risk Management at the National Council.

Rationale for the Change

U.S. Coast Guard regulations were revised and the change is made to call this new requirement to camps' attention.

PS-203 Aquatics: Scuba Programs

Revise Specific Requirements G and I as follows:

- G. Venturing and Sea Scouting groups may participate in introductory and certification scuba programs conducted by recognized agencies appropriate to their age and current level of certification.
- I. Scouts BSA members, Sea Scouts and Venturers may participate in recreational group dives as unit, district, or council activities, provided such dives are consistent with their certifications and are under direct, on-site supervision of a responsible adult currently certified as a divemaster, assistant instructor, or higher rating from a recognized agency. All such activities must meet all requirements of the scuba policy in the Guide to Safe Scouting.

Rationale for the Change:

The change clarifies that Sea Scouts may participate in scuba programs.

PS-206 COPE and/or Climbing Programs

Revise Specific Requirement C.11 as follows:

11. At least one person at the program site must have a valid certificate of training in first aid and American Red Cross
Adult CPR/AED training or
equivalent, and be physically present whenever the
program is in operation. If
the program site is more
than 60 30 minutes away
from emergency medical
services (EMS) an emergency vehicle-accessible
roadway, then a person
trained to a minimum level
of wilderness first aid must
be present on the program
site.

Revise Verification by striking the following bullet:

-Course, element, or artificial surface inspection documents

Rationale for the Change

Specific Requirement C.11 is revised to conform to general BSA policy as set forth in Standard SQ-405, which requires Wilderness First Aid if 60 minutes or more away from EMS.

The inspection of course, element or artificial surface documents is assessed under Standard FA-715. Its inclusion in PS-206 is duplicative.

PS-214 Target and Range Sports: Firearms Programs

Revise Specific Requirement B.5 as follows:

5. Venturing youth and Sea Scouts may use BB guns; pellet rifles; any cartridge-firing rifle with open, scope or dot sights; shotguns; pistols; and muzzle-loading rifles, muzzle-loading shotguns, and muzzle-loading pistols.

Rationale for the change:

The change is made to clarify that Sea Scouts may participate now that they are a separate program from Venturing. In addition, muzzle-loading shotguns are added to clarify that their use is appropriate for Venturing and Sea Scouting youth.

All SQ Standards

Update the applicability language only (other changes below) as follows:

SQ-401 & SQ-402

Should apply to: Long-Term Camps; Day Camps

SQ-403, SQ-405, SQ-406, SQ-407, SQ-408, SQ-409, SQ-410, SQ-411, SQ-412

Applies to: Long-Term Camp, Day Camp, Short-Term Camp

SQ-404

Applies only to: Camp Properties

SQ-406

Applies to: Long-Term Camp, Day Camp, Short-Term Camp, Camp Properties

SQ-407

Delete "Family camp" on page 6 and conform other pages

SQ-401 Camp Staff Qualification: General

STANDARD:

Add new 3 under Specific Requirement A as follows:

3. Long-term camp staff and personnel at a National High Adventure Base must complete an adult application using Code E3 or a youth application using Code NCSY, even if the

adult or youth is registered in another capacity.

INTERPRETATION:

Add new introductory language and revise bullets as follows:

Camp staff and personnel must be registered each year using Code 68, 49, **E3 or** NCSY as appropriate. For purposes of the National Camp Standards:

- Camp staff includes all personnel, paid or volunteer, working under the direction of retained by the council or camp management, who interact with camp participants. Camp staff includes employees, CITs, and continuing volunteers (e.g., camp commissioners, volunteers asked by the camp management to assist program on an ongoing basis).
- Camp personnel includes all other personnel, working under the direction of retained by the council or camp management or by contractors working at the camp, who do not typically interact with camp participants as part of their assigned duties. Examples might include kitchen staff, commissary or warehouse staff, or ranger staff without program responsibilities.
- Camp staff and camp personnel do not include (1) third parties who come on-site to offer a program to camp participants, are accompanied by camp staff while present, and do not remain on-site overnight; and (2) parents and volunteers in day camps and who assist in

program while staff are present and provide supervision. In any camp, an unsupervised volunteer must meet the requirements for camp staff.

Rationale for the change:

These changes implement revisions to BSA's youth protection policies. The change to Specific Requirement A provides for clearer tracking of National Council seasonal employees. The change to the Interpretation clarifies when the requirements of Standard SQ-401 apply in easier to understand and apply language. The **bold-face and underline** text was inadvertently omitted from the Manual.

SQ-405 Camp Health Officer

Revise Specific Requirement C as follows:

C . When access to emergency medical services (EMS) is greater than 60 minutes, the camp health officer must additionally have a current certification in American Red Cross Wilderness and Remote First Aid, Emergency Care and Safety Institute Wilderness First Aid, or equivalent.

Rationale for the Change

"Wilderness" was inadvertently omitted from the name of the Emergency Care and Safety Institute course.

SQ-407 Target and Range Sports: Firearms and Throwing Sports

There are two Specific Requirements "C". Renumber accord-

ingly.

SQ-411 Adventure Program and Activity Staff

Revise Specific Requirement A.2.c as follows:

c. If large boat, training satisfying the requirements of Standard PS-202 203

Rationale for the Change:

The change is made to correct an incorrect cross-reference.

HS-502 Unit Leadership

Replace Interpretation with the following:

Specific Requirements of the Standard:

- A. A unit leader has no other duties that would detract from responsibilities as the unit leader.
- B. Minimum leadership requirements.
 - 1. The minimum leadership
 requirements for any Cub
 Scout unit attending longterm camp is a ratio of two
 adults to a maximum of eight
 youth and one additional
 adult for each four additional
 youth (or part thereof).
 - 2. The minimum leadership
 requirement for other unitbased camps and programs
 is two leaders with each unit
 as provided in BSA's Youth
 Protection Policies, including
 having one registered female
 adult, age 21 or older, in every unit serving female youth.
 If a unit cannot meet these
 standards, then the camp
 may arrange leadership.
- C. A camp that is not organized to provide service to BSA units, but rather to serve individuals,

must provide for adequate adult supervision given the age of the youth and planned activities.
Supervision can be provided by a combination of staff and volunteers so long as the National Camp Standards and BSA's Youth Protection Policies are met.

INTERPRETATION:

In cases of doubt, councils and camps are urged to seek a variance or letter of interpretation from the National Council confirming the appropriateness of proposed adult supervision arrangements for non-traditional camps.

VERIFICATION:

- Observation
- Discussion with camp director, staff members, and others

REFERENCES:

BSA's Youth Protection Policies are available at:

https://www.scouting.org/training/
youth-protection/

Rationale for the Change:

The revision is made to clarify that the former Interpretation sets forth the minimum standard for BSA camps. In cases of doubt, councils and camps are encouraged to engage with National Outdoor Programs staff, Youth Protection Staff, or the National Camp Accreditation Committee, as appropriate, to seek guidance.

RP-551 Mental, Emotional and Social Health (MESH) Support

Applies to: Long-term camps;
Day camp

Effective January 1, 2023

RECOMMENDED PRACTICE

The camp has access to an appropriate support network to assist in responding to staff and camper mental, emotional and social health (MESH) needs. This support network is approved by the council's health supervisor and reflected in the camp's on-site treatment procedures.

INTERPRETATION:

An appropriate network is one that is supervised by a relevant mental health professional with network members operating under supervision. For long-term camps, camp leadership should be able to access the support network as needed, preferably including emergency access.

NCAP recommends that councils consider some level of staff training, a protocol for involvement of the MESH support network, and an in-camp response team that is trained to provide immediate support pending further direction from the support network.

RP-551 will become a standard within two to three years.

VERIFICATION:

- Review of mental health network resources and discussion with camp leadership regarding engagement of these approved individuals.
- Review of written treatment procedures that includes mental health care needs.

REFERENCE:

Additional guidance may be found at the ACA public website:

https://www.acacamps.org/resourcelibrary/mental-health-resources-tips-

camps

Rationale for the change:

According to data gathered by the American Camp Association (ACA), youth mental health incidents at ACA accredited camps have increased substantially over the last decade. Youth at BSA camps are not immune from this trend. BSA believes that MESH is an important and evolving issue and gives notice that RP-551 will likely become a Standard in the next several years as BSA and partner organizations develop best practices.

Initially, RP-551 requires a council/camp to identify an appropriate mental health professional or network to help support the camp in the event of a mental health incident. Resources for councils to consult may include state departments of health, county or municipal health authorities, and universities or hospitals with mental health professionals. The council's health supervisor should be consulted to help identify relevant professionals and to help identify boundaries between MESH and traditional medical assistance to assist camp leadership in determining when to involve MESH support.

For long-term camps, BSA recommends that the council or camp seek to identify a service or network that can provide emergency support in the event that there is a possible mental health incident occurring after hours.

If your council has already started to address MESH issues, please feel free to share your ideas with Eric Hiser at ehiser. BSA@gmail.com for consideration as NCAP considers next steps in

addressing this key area.

FS-603 Camps/Programs Without Dining Halls

Revise "Applies to" to replace "Family Camp" with "Short-term camp" on page 2.

Revise Specific Requirement D.2 as follows:

2. The camp makes adequate provision, either at the trek location or by portable methods, for food storage that will maintain food reasonably safe from reasonableanimal or vermin intrusion.

Rationale for the Change:

NCAP was asked about what is a "reasonable" animal. The correct interpretation is that food should be maintained reasonably safe from animal or vermin intrusion and the sentence is reworded to make this intent clearer.

FA-709 Refrigeration Unit Maintenance and Temperature Control

Revise the Interpretation as follows

INTERPRETATION:

This standard does not cover kitchen and dining hall refrigeration equipment, health lodge-medical refrigeration equipment, or trading post perishable food refrigeration equipment, which are covered by Standards FS-601 through FS-603. This standard covers health lodge medical refrigeration equipment and other refrigeration that is used for program purposes or community refrigerators made available to participants. This standard does not cover vending machines

(unless containing perishable items), or personal ice machines or refrigeration appliances (e.g., a refrigerator in a family or staff cabin), unless also used for food service or program purposes by camp participants covered above. Original equipment supplied thermometers are acceptable if they are nonmercuric, accurate, and visible, and can meet the range requirements in Specific Requirement A.

Rationale for Change:

Brings Interpretation closer to intent after most refrigeration equipment for food service purposes moved to Standards FS-601 through FS-603.

FA-715 COPE and Climbing Facilities

STANDARD:

All constructed facilities for COPE and climbing facilities programs are properly installed and inspected in compliance with the policies of the Boy Scouts of America; Association for Challenge Course Technology Standards; and other governing jurisdiction regulations.

Specific Requirements of the Standard:

Revise Specific Requirement C as follows:

- C. All COPE course and artificial climbing structures shall receive a professional inspection pursuant to ANSI/ACCT Standard 03-2019, Chapter 1, Sections B.1.2 and B.2 annually. Shall be inspected annually by a qualified professional inspector
 - 1. This inspection shall be documented by a written

report.

- 2. The council shall prepare
 a written response to the
 inspection report within 60
 days setting forth a schedule
 to correct any deficiencies.
- 3. A council or camp may not operate a COPE or climbing course element after a professional inspection finding of an imminent life safety deficiency until any such deficiency is corrected and the correction is approved by a qualified person.
- D. Portable challenge structures
 (e.g., portable climbing walls,
 portable challenge courses)
 shall be set up, operated,
 maintained, inspected, and
 recertified according to manufacturer's recommendations.
 All custom fabricated portable
 challenge structures shall be
 inspected by a qualified professional inspector prior to use and
 annually thereafter.
 - 1. All custom fabricated portable challenge structures shall receive an acceptance inspection pursuant to ANSI/ACCT Standard 03-2019, Chapter 1, Section B.1.1 and B.2 prior to use.
 - 2. All custom fabricated portable challenge structures shall also comply with Specific Requirement C.

- - -

F. All newly constructed COPE and climbing facilities must have an initial acceptance inspection <u>pursuant to ANSI/ACCT Standard 03-2019, Chapter 1, Section B.1.1 and B.2 prior to use. BSA requires that an independent qualified</u>

person conduct this inspection.

INTERPRETATION:

Revise the Interpretation as follows, by adding new paragraphs at beginning:

A COPE/climbing course or portable challenge structure should receive at least the following inspections annually under NCAP: a precamp/postcamp inspection by the council; an annual professional inspection under the ANSI/ ACCT Standard 03-2019, and an annual NCAP inspection (this will occur at least twice if the program is located at a long-term camp once by the council and once by the zone). Some states may regulate zip lines or other COPE course elements as amusement rides, which may also require an inspection. Councils are responsible for ensuring compliance with all state and local laws.

The purpose of the precamp/postcamp inspection is for the council to assess what needs to be done to prepare the course for the next season. This fulfills requirements under Standard FA-701. It could also fulfill Specific Requirement B.

The purpose of the professional inspection is to ensure that the COPE/climbing course or customfabricated portable challenge structure physically meets life safety requirements under ANSI/ ACCT Standard 03-2019. The inspector must prepare a written report confirming that the inspection conforms to Standard 03-2019, that the inspector is a gualified person, and setting forth any deficiencies and recommendations. The council has 60 days to prepare a written response setting forth the proposed corrective action (or disputing the finding)

and a schedule by which it will be implemented. Corrective action must be verified by a qualified person or a competent person acting for a qualified person. This may occur during the inspection.

The purpose of the NCAP assessment is primarily to view the course in action to assess whether the staffing and program requirements of Standard PS-206 and SQ-409 are met and are primarily addressed in that standard. However, the NCAP assessment must also confirm that the professional inspection has occurred, that the council has responded, and that the review of the paperwork shows that the course is being maintained as necessary to protect life safety. If, based upon the written report and response, the NCAP assessment team has concerns that life safety may not be protected (for example, the report identifies a life safety issue that the response does not address at all), it should immediately contact the National NCAP staff advisor and identify those concerns in its report.

Add the following to the definition of Qualified Person at the end

Possession of a National Camping School certificate, standing alone, does not make a person a "qualified person" under the ANSI/ACCT standard for purposes of assessing course facilities and life safety.

Revise Verification as follows by adding a new bullet at the beginning:

<u>During an NCAP assessment</u>
 of a COPE/climbing course,
 the assessment team shall
 verify that the ANSI/ACCT

inspection has occurred within the past year (within 12 months) by reviewing the professional inspection report and the council's response. If the report is not available, or does not state that it was conducted in accordance with ANSI/ACCT Standard 03-2019, or does not state that the inspector is a qualified person, or the council's response appears inadequate to address a health or safety concern, then the assessment team should notify NCAP@scouting.org.

Add to reference section:

A list of professional ACCT vendors is found at https://www.acctinfo.org/page/PVMList

Rationale for the change:

This change implements revisions to Standard FA-715 to clarify the required inspections for the various types of COPE and climbing courses. This change is consistent with the changes made to Standard SA-003 and are meant to be read in conjunction with those changes.

First, there is a professional inspection report; Second, the council closes any element with a life safety deficiency; Third, the council prepares a written response to that professional report; Fourth, the council must correct any life safety deficiencies before reopening a course element. Corrections must be approved by a qualified person. Note the **boldface** additions in Specific Requirement C.3., omitted from the published text, which only requires closing the specific element(s) that are flagged as deficient in the ACCT profesional

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inspection. The elements may be reopened once they are corrected and the correction is approved by a "qualified person" as described in this paragraph.

Any COPE course and any constructed portable course are "artificial climbing structures." NCAP recognizes that certain mass-produced climbing structures do not require an initial acceptance inspection under the ANSI/ACCT standard. Any custom-designed course or climbing structure requires an initial acceptance inspection.

BSA requires that initial acceptance inspections be conducted by independent qualified persons, which means (a) a competent person under the direction of a qualified person, or (b) a qualified person, where (a) or (b) are without financial interest in the initial construction of the course.

Finally, BSA and NCAP wish to be clear that BSA-issued COPE/ Climbing certifications (e.g., National Camping School cards, Level I, Level II instructor cards) do not qualify an individual as a "qualified person" to conduct a "professional inspection" as that term is used in the ANSI/ACCT Standard. A "qualified person" must have other training and/or experience to fulfill those requirements. Conversely, a person with a BSA-issued COPE/Climbing credential would be an appropriate member of a council assessment team conducting the annual assessment by NCAP trained personnel, so long as individuals holding appropriate NCAP assessor training are leading the assessment.

2022 Assessment Findings Overview

In 2022, the National Council through its zones conducted 434 assessments. The following results were obtained:

 Noncompliant
 5
 0.01%

 UNC
 53
 0.12%

 Deviation
 216
 0.51%

The **Noncompliant** findings were made on the following standards:

- 3 AO-802, BSA Authorization
- 1 AO-801, Comply w/Law
- 1 SQ-412, Other Staff Qual.

For the **Upgraded from Non-compliant (UNC)** score, Standard FA-703, Fire Prevention and Detection, accounted for 8 of the 53 findings.

For the **Deviation** findings, the following standards accounted for a disproportionate number of findings:

- 17 FA-703, Fire Prevention
- 14 AO-810, CCIP
- 9 HS-505, Medical Policies
- 9 HS-506, Treatment Procs.

where CCIP stands for the Continuous Camp Improvement Program.

While at one level NCAP is pleased that it appears BSA camps are performing so well compared to the National Camp Standards, at another level NCAP is concerned that assessment teams are not enforcing the standards strictly enough and may be accepting "substantially" in compliance with standards, terms and conditions or waivers/variances as meeting the intent of the NCAP program. If it is the latter, then the assessment program is not meeting the intent of the NCAP

program, which calls for NCAP to result in "elevating the performance" of BSA camps.

In order to meet this objective and ensure a safe and high quality BSA camping program for all participants, it is critical that assessment teams -- regardless of whether zone or council -- be honest in their assessment or it makes it difficult for camps and local councils to improve their programs. One of the benefits of assessment is bringing in "third party eyes" to look at the program. If we work at a camp, we tend to see the camp as it has always looked and that is "ok." A third party may see items we do not. that is why the assessment is so important.

Assessors are often concerned that marking a potential deviation may result in loss of accreditation. NCAP assures both assessors and camps that this is not the case. Accreditation can only be lost if there is a repeated problem that continues for multiple seasons.

Similarly, marking a noncompliant or deviation does not necessarily require conditional accreditation. A camp can have up to two UNCs, or 10 deviations (with a UNC counted as the equivalent of 5 deviations) before conditional accreditation is required. Even if conditional accreditation is reguired, if the camp completes its corrective action plan promptly and reports those corrections with appropriate documentation to the zone assessment coordinator. the conditional accreditation may be changed to fully accredited. NCAP's goal is to return camps quickly to fully accredited status.

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AO-808 Requirements for Council Reporting

Revise "Applies to" on page 808-4 to replace "Family Camp" with "Short-Term Camp."

SPECIAL NOTICE: Missing Text in Standards

NCAP noted three clarifying changes that did not make it into the National Standards Manual. These are as follows and are shown in **bold face and under- line** in the standard-by-standard discussion. The missed text may be found in the followingparts:

- Opening material, "The Accreditation Decision" clarification on how UNC counted.
- Standard SQ-401, omitted the national staff code "E3".
- Standard FA-715, omitted clarifying text that course <u>elements</u> with life safety deficiencies must close.