

**Questions and Answers about the New Wisconsin Recreational and Educational Camp Rule, ATCP 78,
Effective September 24, 2023**

Question	Answer	Notes	Code Reference, ATCP
Please provide the link to the webpage so that we all know exactly where we should be looking for these revision resources.	Link to the Department’s recreational and educational camps home page is: DATCP Home Recreational and Educational Camps (wi.gov)		
Clarify examples of “camp staff” as it relates to background checks	<p>After reviewing the definition of “camp staff”, that <i>means paid or unpaid personnel involved with camp operations. Camp staff does not mean a parent or guardian that accompanies a child to camp as a participant and does not have unsupervised activity with other campers.</i></p> <p>Consider asking if the staff or volunteer has unsupervised time with campers. Adults counted within ATCP 78.25 adult camp staff to camper ratio are considered camp staff and must meet background check requirement.</p> <p>Examples:</p> <ul style="list-style-type: none"> • Mayor comes to camp for an hour and present on special topic-no* • Camp counselors/teachers who provide lunch coverage while routine counselors have time away-yes • Additional volunteers that may spend time with campers, but where counselors remain present, day trips extra sets of eyes-no* • Ground folks mow lawns, water plants-no* • Food service staff dining halls-no* • Campus public pool lifeguard-no* • Residence hall staff (custodians, event organizers)-no* <p>*For any of these answered with no, background check consideration should be given if there is any unsupervised time with campers.</p>		ATCP 78.03 (13) & ATCP 78.26 (1) (a)
What is the difference between “playground” and “low element”? Is there a definition for “facilitated”?	There is no formal definition for “facilitated”. What we mean is an activity that is led or instructed by camp staff. Ask for clarification if this area is used as a free time or an off-time option (then playground). Does a leader need to guide campers how to complete the safe use of each station? If it is part of an organized activity on the camp schedule (then low element)?		ATCP 78.03 (40) & (49)
The second part of the definition of “low element” is confusing. It says, “spotted if needed”. Pushing	Refer to above answer regarding the difference between playground and low element. Camp staff pushing a camper on a swing is an example used in our definition of “playground” used in ATCP 78.03 (49) <i>means an area used for unfacilitated activity including outdoor play or recreation by</i>		ATCP 78.03 (49)

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<p>someone on a swing could be considered spotting.</p>	<p><i>campers with equipment including slides, play sets, horizontal bars, swings.</i></p>		
<p>Can you please explain the hospitality add-on, and reference the Subchapter number? How exactly do you qualify for the requirements of that add-on?</p>	<p><i>“Hospitality activity” means an additional activity offered by a camp operator including a retail food establishment, campground, hotel, motel, bed and breakfast establishment, or tourist rooming house within the confines of the camp, utilizing the same camp structures to serve other adult guests and their families. “Hospitality activity” does not include the operation of a retail food establishment, campground, hotel, motel, bed and breakfast establishment, or tourist rooming house that is solely operated independently and separately from the recreational and educational camp operation.</i></p> <p>Simply put, if a rec ed camp’s facilities are utilized by other groups or individuals when the rec ed camp is not in session, then yes, that qualifies for this add-on.</p> <p>Inversely, when there are independently run establishments that are not a part of normal rec ed camp operations and facilities then the add-on does not apply, and a separate license is required for that activity.</p> <p>Examples:</p> <ul style="list-style-type: none"> • If we rent our cabins and dining hall to adult groups such as weddings and retreats when camp is not in session, do we need a hospitality add-on? Yes, these are facilities normally utilized during rec ed camp sessions. • If our camp facilities are rented out to outside groups for special events or meetings, do we need the hospitality add on-Yes, if these are the same facilities that are used during rec ed camp sessions. Do we also need to keep our Tourist rooming house license? No, because this is now considered a hospitality activity, a separate license is no longer required. • If a food/banquet inspection is already done by the health department through a separate license, then is it still a hospitality add-on for the purposes of ATCP 78 license Yes or would it be counted/costed in two different licenses? No. As provided in the notes under ATCP 78.07 (1) (a) 7.: <i>A university campus kitchen prepares and serves food to campers and campus students, because the kitchen does not solely operate independently but in conjunction with student food service, no additional retail food establishment license is required.</i> • A tourist rooming house or cabin is operated independently from the rec ed camp. Does the hospitality add-on apply? No. The tourist rooming house is not considered a part of the rec ed camp facilities or operations so a separate lodging license would be required. 		<p>ATCP 78.07 (1) (a) 7. & ATCP 78.03 (35)</p>

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	*If you encounter a situation where you need additional guidance, please reach out to the DATCP rec team inbox, datcpdfsrec@wisconsin.gov .		
Does the lodging provided under the hospitality add-on need to meet ATCP 72? That is, a lodging license is not required but the facility needs to meet the lodging code requirements.	Yes , as provided in ATCP 78.07 (1) (a) 7.: <i>A person that operates a... hotel, motel, or tourist rooming house under a camp license shall follow and is subject to the applicable administrative rules for that activity...</i>		ATCP 78.07 (1) (a) 7.
If the program is only for two nights and does not meet the definition of camp as an activity of four overnights or greater, does it fall outside the scope of ATCP 78 regulations?	No , to clarify the exemption, the length of stay licensing exemption only applies to a situation where there is fewer than four consecutive nights and there are not permanent facilities for food and lodging. An example of this exemption is a weekend experience with rustic tent camping and packing a cooler of food to cook over a fire in forest or field. A program for two nights does meet the definition of a rec ed camp if there are permanent facilities for food or lodging.		ATCP 78.07 (1) (c) 2.
Can you direct us to the regulations for day camps with Department of Children & Families?	Yes , day camps are defined in part as having no overnight stay, so they are not considered a Rec Ed Camp activity, but they have their own license from Children and Families. Day camps are regulated Department of Children & Families regulations .	DCF 252	
If a youth activity is happening in a commuter format (day only program) but the youth participants are staying in a hotel nearby with chaperones (i.e., they come to our facilities for day-programs only and are signed out to parent/chaperones between 4 p.m. and 9 a.m.) - Can you confirm that the overnight portion of the program is exempt from ATCP 78 regulations since they are not in our facilities	No , if the activity does not involve overnight sleeping accommodations, this is considered day camp regulated by the Department of Children and Families. This would not fall under the scope of rec ed camp, ATCP 78. See link above in previous question.		

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and not in the care of our staff?			
If a camp sleeping lodge has six separate lockable rooms/apartments is this still considered one stand-alone sleeping structure per license category assessment?	<p>If this lodge is one overall building, count it as one stand-alone sleeping structure. The lockable rooms do not factor into the calculator for the rec ed camp licensing assessment.</p> <p>The rule only calls out college dorm buildings for counting individual rooms.</p>		ATCP 78.08 Table A
A camp has four wells on the property and all four are sampled and inspected by DNR. However, one of the wells does not serve campers. Does it still count because it is on the property? It potentially could serve campers as it is a water source and approved safe for consumption.	Yes. Review in the table it says the camp utilizes more than three private wells to supply camp drinking water. Count all wells on the licensed premises.		ATCP 78.08 Table A
For camps that have elected to do the delayed inspections (three years), do they need to be inspected this years since there is a new revision to the rule?	Yes. A camp must demonstrate active managerial control outlined in the rule before the Department or its agent may elect not to perform a routine inspection. Be aware that the provision in the rule indicates that the Department or its agent “may” elect to waive an annual inspection 2 out of every three license years or they may choose to continue performing annual inspections. This is a conversation between each camp and the Department or its agent.		ATCP 78.15
Are parents who come along with campers as participants in a rental group applicable to background check verification on the written agreement?	No. Per the definition of “camp staff” <i>means paid or unpaid personnel involved with camp operations. Camp staff does not mean a parent or guardian that accompanies a child to camp as a participant and does not have unsupervised activity with other campers.</i>		ATCP 78.16 (c) (9.) & ATCP 78.03 (13)
As a rental facility what are the implications of an organized group arriving and not meeting the 1:10 adult to youth ratio if we	The licensed rec ed camp operator is responsible for validating that the rental group is meeting all the requirements of the written use agreement. During a routine inspection, violations that are considered to be an immediate danger to health could result in temporary orders being issued to cease operation.		ATCP 78.05 & ATCP 78.16 (1) (d)

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have reiterated the need to meet this ratio prior to arrival?			
We are a rec ed camp that rents out our facilities only. Are we supposed to ask groups if they have serious injuries so we can report them?	Yes , use the written agreement to clearly identify the responsibility of the licensee and the rental group including the reporting of death, injury or illness incidents to the department or its agent.		ATCP 78.16 (1) (d)
As a university, we have camp staff that live on-site. Several have spouses/partners that are not employed by the University but live on campus. Will those spouses/partners need background checks as well?	This depends, at any recreational and educational camp, if any individuals 14 years or older reside on the camp premises and have access to campers, they are required to have a criminal background check. If they reside in an area where they do not have access to campers, a background check would not be required. See ATCP 78.26 (1) (a).		ATCP 78.26 (1) (a)
Does the requirement for artificial lighting apply to privies?	No , only toilet facilities that apply to state building code require interior lighting. SPS 391.12 does not mandate lighting in privies or portable restrooms. The intent in the revised rule for proper lighting is to ensure camper safety during nighttime hours. Possible options for consideration during evening privy use include flashlight availability for campers, dusk-to-dawn exterior lighting, or solar lights.		ATCP 78.20 (1) (c) & (f)
Do hand dryers qualify for acceptable toweling or does the update require hand towels/paper towels to be available?	Yes , hand dryers are acceptable referred to in rule language as a hand drying device. See ATCP 78.20 (1) (h) (3.) <i>Single-use toweling or a hand drying device in locations that are accessible to all campers, staff and visitors.</i>		ATCP 78.20 (1) (h) (3.)
What is considered a non-slip surface for showers? We currently have non-slip tile in our main cabins would this meet the standard?	The purpose of non-slip surface in the rule is to prevent slips, trips and falls in the shower area. There are several options to meet this requirement. A camp could have textured flooring, nonslip tub grip, matting or provide documentation that the flooring in place qualifies as non-slip.		ATCP 78.20 (1) (i) (2.)
Does an individual "bed" need to be provided for each camper if the group stays at a hotel during	Yes . The intent of the rec ed camp rule is to provide the parental-type supervision of the child (camper). Just because the youth are staying off campus at a hotel environment, the separate bed provision applies.		ATCP 78.21 (1) (a) 1.

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their youth camp programming?			
Would it be considered a violation of ATCP 78 if a licensed camp developed an internal policy on youth participants sleeping room assignment that best aligns with their gender identity?	No , sleeping quarters per ATCP 78.21 does not address designation. This is a camp-based decision using internal policies and procedures.		N/A
Do side openings for ramps also need to be enclosed, or at least "spindled" to the requirements of the code for stairs?	Yes , for slip, trip and fall injury prevention. Consult with DSPS for ADA ramp specifications.		ATCP 78.24 (2) (b)
If our staff has been trained by a fire alarm system service company, can we inspect and test our own fire alarm system annually, or does it need to be done by a service company?	It is always recommended that you perform routine testing of your fire alarm system. Regarding requirements for annual testing by a fire alarm service company or local fire department, the Department of Safety and Professional Services has the primary responsibility for fire alarm system requirements. Refer to DSPS or local fire department for clarification regarding testing requirements.		ATCP 78.24 (8) (e)
In the adult -camper ratio, if a staff member is always present, can a volunteer be counted in the ratio? Example: if we want to have a group of 12 campers who are all seven years old, can we have a camp staff and a volunteer working together to meet ratio requirements?	Yes , adult volunteers count as "camp staff" per ATCP 78.03 (13). See response on page 1.		ATCP 78.25 & ATCP 78.03 (13)
For programs that take place within our organization that do not meet the definition of "camp" and are not	No , if the activity does not involve overnight sleeping accommodations, this is considered day camp regulated by the Department of Children and Families. This would not fall under the scope of rec ed camp, ATCP 78. *Important to remember camp must follow the rule requirements based on the activity that you are providing.		ATCP 78.25

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<p>residential/overnight (e.g., a one-hour visit with a school group) are we required to follow the supervision standards of the ATCP 78 regulations for those programs that fall outside of the definition of "camp"? Example: a school group with school chaperones coming for a one-hour tour and arrives with a 1:12 ratio.</p>			
<p>Has DATCP legal counsel completed guidance regarding how ATCP 78.26 (1) (c) background check threshold policy section relates to the Wisconsin Fair Employment Act? If so, where is it published?</p>	<p>Yes, see the Department’s recreational and educational camps home page, or click this link: Background Check Findings & the Wisconsin Fair Employment Act Interpretive Memo</p>		<p>ATCP 78.26 (1) (c)</p>
<p>Is ex-military enough to qualifications to be a firearms supervisor?</p>	<p>Yes. See definition of “trained adult” is applicable through certification OR documented training or experience in a specific area or field, such as a resume.</p>		<p>ATCP 78.26 (3) (a) & ATCP 78.03 (74)</p>
<p>Does the code say we need to conduct a background check on everyone every year?</p>	<p>No, ATCP 78.26 (1) (d) requires that all existing and new hires prior to extending employment shall have a background check performed every two years.</p>		<p>ATCP 78.26 (1) (d)</p>
<p>Clarify initial acceptance inspections: 1. For new challenge course builds, if Vendor A does the build, Vendor A can then NOT do the acceptance inspection and must employ Vendor B, correct?</p>	<ol style="list-style-type: none"> Yes, see ATCP 78.26 (3) (b) 6. <i>Any newly constructed challenge course after July 1, 2023, shall complete an initial acceptance validation inspection by a qualified third party from the Association for Challenge Course Technology, Professional Ropes Course Association or a structural engineer licensed in Wisconsin, before beginning operation.</i> It depends, if the major modification only includes repair to an existing element, then No. If the major modification results in a newly constructed course different from what was initially installed, then, Yes, this would be considered newly constructed 		<p>ATCP 78.26 (3) (b) 6.</p>

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<p>2. If a major modification is made to an existing challenge course element by Vendor A, an acceptance inspection can be done by Vendor A in that instance, correct?</p>	<p>and be required to have an initial acceptance validation inspection by a qualified third party.</p>		
<p>1. Who conducts the pre-inspections and inspections? 2. If a camp builds a ropes course or major addition to a ropes course is an independent inspector needed to certify the course? 3. What are the specific requirements for staff operating a challenge course? 4. How were these revisions developed? 5. Was it done by DATCP only? 6. Was there consultation with affected parties? 7. Was there a public comment period?</p>	<p>1. The Department is unclear of the context of this question. If you are referring to inspections of rec ed camps, this would be done by the Department or its Agent. If you are referring to the initial acceptance validation inspections, then a qualified third party from the Association for Challenge Course Technology, Professional Ropes Course Association or a structural engineer licensed in Wisconsin would perform the challenge course inspection. 2. Yes, see the response above in 1. 3. The requirements for supervision, staff training and recordkeeping are found in ATCP 78.26 (3) (b) 3.-5. 4. The revisions were developed by the recreational educational camp rule revision workgroup that included participants from regulatory and the rec ed camp industry. 5. No, see response above in 4. 6. Yes, see response above in 4 and subject matter experts from the Association for Challenge Course Technology and Professional Ropes Course Association were also consulted. 7. Yes, a public comment period for the scope statement occurred February 14 & 17, 2020. The public hearing for the rule occurred February 15, 16, 17, 2022 and March 2 and 3, 2022.</p>		<p>ATCP 78.26 (3) (b) 6. ATCP 78.26 (3) (b) 3.-5.</p>
<p>1. What type of training and how much training is appropriate for challenge course staff? 2. Who has to do the assessments for the annual site-specific hands-on skills? Is that just the "qualified"</p>	<p>1. The details or length of training depends on each challenge course. Trainers are expected to follow ACCT or PRCA standards. The camp should expect to be asked questions during a routine inspection and be able to show documentation of what training was completed, who conducted the training, roster of participants, and the date it occurred. For example, if there is a zip line offered to campers, the documentation must include training on those site-specific features. 2. Yes, it is the camp's challenge course supervisor's role to lead their staff training.</p>		<p>ATCP 78.26 (3) (b) 3.-5.</p>

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<p>staff that has received outside training?</p>			
<p>1. NAARSO and AIMS are not listed, these certifications are more complex and require more of the applicant and sponsor company than ACCT, does the state accept NAARSO and AIMS certified inspectors as qualified to perform the inspections?</p> <p>2. ACCT in addition to certifying inspectors - offers a Level 3 Supervisor Endorsement, which basically is an advanced certification for an inspector that may supervise non-certified inspectors (review their inspection reports and sign off on their inspections - even though the signer was never onsite. What is your department's stance on this?</p>	<p>1. No, currently, the rule only includes qualifications from ACCT, PRCA or a structural engineer licensed in Wisconsin. If NAARSO or AIMS inspector holds qualifications from ACCT, PRCA or a Wisconsin licensed structural engineer they would be considered a qualified inspector. The Department will research both NAARSO and AIMS to determine if they meet comparable compliance. If so, a guidance document will be created accepting those credentials for performing qualified third-party inspections.</p> <p>2. No, we would expect that the individual performing the inspection is certified from the Association for Challenge Course Technology and indicate their certification number on the inspection report.</p> <p>Note: ACCT provides individual certification while PRCA provides accreditation to a vendor that involves an in-depth peer-review process, to ensure and validate that their design, installation, training, inspection, and other services comply with the ANSI 1.0-3- 2014 American National Safety Standards.</p>	<p>Department to research NAARSO, AIMS, and climbing wall industry inspector certification programs. Review DATCP website for future additions to approved 3rd party inspection providers.</p>	<p>ATCP 78.26 (3) (b)</p>
<p>Clarify regulation when a challenge course was installed right before the revised rule went into effect. Would it be my understanding that that vendor could</p>	<p>It depends, any challenge course that were built and installed before the effective date of the rule are not required to complete an initial acceptance validation inspection. After the effective date of the rule, existing challenge courses are required to complete a third-party inspection every 24 months. The installation vendor could be considered the third party as long as the vendor's inspector meet the minimum qualifications, per ATCP 78.26 (3) (b) (1.) a.</p>		<p>ATCP 78.26 (3) (b) (1.) a.</p>

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<p>continue to do inspections on that structure as long as the structure was installed before the September implementation of the law?</p>			
<p>1. There is no definition for "Third Party" 2. I understood as a vendor, we could inspect our own work and could take care of the clients that we installed courses at their facilities. Now this may be interpreted that if we build a new course for a camp that we need to have another entity do the commissioning inspect or all inspections after installation. 3. Have you heard from any camps that their insurance companies are okay with inspections every 24 months?</p>	<p>1. The definition for "third party" is referenced in ANSI/ ACCT 03-2019 standard, meaning a qualified person not directly employed by the challenge course owner or by the manufacturer at the time of installation and prior to commissioning. 2. The initial acceptance validation inspection that is performed after a challenge course is constructed must be completed by another entity that is not the owner or the manufacturer at the time of installation. However, that only applies to the initial acceptance validation inspection. A manufacturer could conduct the inspection every 24 months thereafter as long as the vendor's inspector meet the minimum qualifications, per ATCP 78.26 (3) (b) (1.) a. 3. Insurance companies may have more strict inspection requirements, so camps are advised to follow whatever is most strict.</p>		
<p>Please explain the number of lifeguards I will need to staff water activities. From what I understand, I will need one lifeguard for every 50 participants or a fraction thereof for</p>	<p>ATCP Table 78.26 Lifeguard and Attendant Staffing Per Activity applies to waterfront activity at a camp. For a licensed public swimming pool located on camp premises refer to ATCP 76 for swimming pool staffing requirements. Yes, one lifeguard and one attendant per 50 people or fraction thereof is the minimum staffing for rec ed camp aquatic program activity. See definition of "aquatic program activity" per ATCP 78.03 (6) <i>means any</i></p>		<p>ATCP Table 78.26</p>

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<p>each activity. I am assuming that two pools would constitute two different activities, with one lifeguard needed for each pool if there are less than 50 people in that pool regardless of the number of slides or diving boards in that pool.</p>	<p><i>recreational or instructional activity occurring in or on a natural or man-made body of water.</i></p>		
<p>If the CPR certification is not connected to lifeguarding, does it need to be renewed annually? Is Red Cross changing the requirements for CPR?</p>	<p>No, annual CPR updated impact is lifeguards only. Red Cross is aware of the change.</p>		<p>ATCP 78.26 (3) (c) 3.</p>
<p>Just want to make sure that I heard you correctly, is child neglect/abuse and sexual abuse training also required annually?</p>	<p>Yes, per ATCP 78.26 (5) (c) camper sexual abuse prevention training shall be conducted annually.</p>		<p>ATCP 78.26 (5) (c)</p>
<p>How frequently is Sexual Harassment/Violence (Title IX) training now required? Is it required annually along with Mandated Reporter for child abuse/neglect training?</p>	<p>See above answer related to camper sexual abuse prevention training frequency. Title IX and mandated reporter training are outside the scope of ATCP 78.</p>		<p>ATCP 78.26 (5) (c)</p>
<p>Is there a specified content program to provide for the camper sexual abuse prevention training?</p>	<p>No. The rule only provides the required content topics. It does not specify the format in which the training should be given. Training can be provided from a variety of sources, including in-house training, insurance company training, private vendor or online training as long as the required content topics are covered.</p>		<p>ATCP 78.26 (5) (c)</p>
<p>1. What requirements are on the camper health history forms? Please clarify about:</p>	<ol style="list-style-type: none"> 1. See ATCP 78.27 (1) (d) for all required contents on a camper health history form. 2. A written report of a physical examination performed within the preceding 24 months by a physician, physician assistant, or a nurse practitioner is included as a note, it is not a requirement, but as a recommendation. 3. Immunization information is clarified in ATCP 78.27 (1) (d) 1. d. 		<p>ATCP 78.27 (1) (d)</p>

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<p>2. Signed physical exam 3. Vaccination records</p>			
<p>The revision training webinar mentioned an explanation memo related to camp staff health history. Could you share the link to that?</p>	<p>Yes, see the Department’s recreational and educational camps home page, or click this link: Camp Staff Medication Administration Compliance with ADA Federal Law Interpretive Memo</p>		<p>ATCP 78.27 (1) (e)</p>
<p>If emergency phones automatically dial 911 and the dispatcher can automatically identify the location, does location/address info need to be attached to/posted near the phone?</p>	<p>Yes. We would not rely on automatic info to the 911 operator, what if that info relies on a network that could be down? Also, could that system have info that is not reliable, especially for large buildings and those with multiple entrances. It can be very chaotic when injuries or incidents arise, so posting location is a basic help for any caller to ensure EMS response gets to the correct place.</p>		<p>ATCP 78.27 (1) (h)</p>
<p>I want to confirm that I understand this correctly. So, a minimum of one (for under 30 mins response time) overnight health staff needs ALL the following: CPR/AED/First Aid, Medication Administration, AND anaphylaxis training?</p>	<p>For overnight health service coverage, see ATCP Table 78.27 for clarification.</p> <p>If you need additional guidance, please reach out to the DATCP rec team inbox, datcpdfsrec@wisconsin.gov.</p>		<p>ATCP Table 78.27</p>
<p>1. Is it true that we are meeting the spirit of the code if all camp staff have CPR/first aid, AED, and med dispensing and anaphylaxis training? 2. Can a local medical facility provide AED, and 3. Epi-pen training?</p>	<p>1. Yes, in addition to the camp health supervisor, all these camp staff could be considered health services staff for coverage. 2. See job aid for listing of all Department approved equivalents for CPR/AED certification. AED training is provided with CPR certification. 3. Epi-pen training, known as anaphylaxis training would be acceptable if provided by a local medical facility if the training is in compliance with s. 255.07 (5) and a training certificate is provided.</p>		<p>ATCP 78.27 (2) (b)</p>

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<p>Please confirm the required frequency of medication administration and epi-pen training.</p>	<p>The Department of Public Instruction medication administration principles online course is required on an <u>annual</u> basis per ATCP 78.27 (2) (b) 4.</p> <p>Epi-pen training is included in ATCP 78.27 (2) (b) 5., referred to as anaphylaxis training, and is required at least every <u>4 years</u> per s. 255.07 (5) if the camp is an authorized entity.</p>		<p>ATCP 78.27 (2) (b) (4.-5.)</p>
<p>Can you clarify if epi-pen/anaphylaxis training is a requirement or rather a recommendation?</p>	<p>It depends. If the camp is prescribed epinephrine as an authorized entity that is not patient specific or the camp plans to have health services staff help administer epinephrine then this training is required.</p>		<p>ATCP 78.27 (2) (b) 5.</p>
<p>Is there an epi pen training module that you suggest?</p>	<p>No, See Required Emergency Care Courses and Certificates for Recreational Programs Staff for list of options.</p>		<p>ATCP 78.27 (2) (b) 5.</p>
<p>For camps with many staff including international staff is there a way to do our medication administration online course as a group? Or should each summer staff be sent the link and provide proof of completion? Same with epi training?</p>	<p>Yes, just retain roster of names of group attendees as documentation of training including the date completed.</p> <p>Keep in mind the DPI medication administration training is required annually whereas, anaphylaxis is on a four-year cycle.</p>		<p>ATCP 78.27 (2) (b) 4.-5.</p>
<p>Can a camp counselor with CPR/first aid and the med dispensing class, administer medications if the health supervisor is off?</p>	<p>Yes, that is the intention for the health services coverage.</p>		<p>ATCP 78.27 (2) (c)</p>
<p>In the 9/19/23 session, the presenter brought up the use of an epi pen that had been prescribed to a camp as an entity, not to a person. How is this done? Locally, the pharmacy that we tried wouldn't allow this. In addition, w/o the prescription written to a person,</p>	<p>The statewide epinephrine standing order for pharmacies is outside the scope of ATCP 78. This rule covers the camp staff training requirements. See ATCP 78.27 (2) (b) (5.): <i>If a camp is prescribed an epinephrine auto-injector or pre-filled syringe as an authorized entity that is not patient-specific or the camp plans to have health services staff help administer epinephrine to a camper, health services staff shall complete an anaphylaxis training program required pursuant to s. 255.07 (5).</i> See attached link for Department of Health Services statewide standing order for pharmacists.</p>	<p>Statewide Epinephrine Standing Order for Pharmacists</p>	<p>ATCP 78.27 (2) (b) (5.)</p>

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there is no insurance to share the cost, so even if possible, it would have been the cash price, >\$400.			
Is there a specific document that should be used when asking for written documentation of EMS response time? How should we handle refusal from local EMS services to put that response time into writing?	No , no specific form or template exists. It is voluntary, if there is nothing in writing, then the minimum number of health services staff available at all times during camp operations must follow ATCP Table 78.27 for when response time is greater than 30 minutes.		ATCP 78.27 (2) (b)
Also related to EMS response time, what about camps that already have emergency certified rescue professionals on-staff? Is the target response time zero?	No , it is also about the ability to transport to a higher level of care. See definition of "EMS response" <i>means a Wisconsin emergency medical service that provides ambulance service response in a geographic area and is staffed by certified rescue professionals such as an emergency medical technician or emergency medical response.</i>		ATCP 78.27 (2) (b) & ATCP 78.03 (24)
What are the minimum qualifications for other staff overnight coverage?	See ATCP Table 78.27. The minimum number of staff and qualifications are detailed in this table and are dependent on EMS response time.		ATCP Table 78.27
What are the acceptable recordkeeping options now? The revision training recording noted we are not able to use medication logs that we create as a camp - what form should we use instead?	The revision allows for 3 options per ATCP 78.27 (5) (b): 1. In a bound book with preprinted page numbers. See fact sheet, What is a Bound Book . 2. By electronic entry into a software program that documents each change to the health record and that does not allow previous changes to the health record to be edited or deleted. 3. By making an electronic medication administration record, printed with the date and time stamp, from a health software program to be used for manual recording with a signature on the form of the individual making entries.		ATCP 78.27 (5) (b)
If blister packs are made up in the health center for each individual camper, can a camper's name and medication be	Yes . This could be acceptable with a variance issued by the Department.		ATCP 78.27 (4)

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handwritten on the inside cover of the blister pack.			
We have minors from other countries attending camps. If I understand correctly, their medication packaging is sometimes labeled differently than in the US. If a minor from a foreign country comes with meds that are not labeled exactly as they would be in the US, what do you recommend that we do?	The Department would consider a variance for comparable compliance for camps who offer programming to international campers with medications based on your health services team’s development of a SOP including your consulting physician sign off if medication labeling does not align with ATCP 78.27 (4) (a) requirements.		ATCP 78.27 (4) (a)
Do staff over 18 years old, for example counselors staying in the dorms with campers, who are able to administer their own meds have to keep their meds in a locked container? i.e. Tylenol or allergy meds?	Yes , securing them on your person during the day such as carrying medications in a purse or bag worn is considered secured. The locked storage is meant for the medication that is not kept on the person. A locked bedroom is considered secured storage. Other common examples include lockable bank bags or a tackle box with a lock.		ATCP 78.27 (4) (d)
Regarding adults in dorms administering their own meds, what if the adults are in their own locked rooms that campers do not have access to? Do they still need a locked box in that locked room?	No , see answer in above question.		ATCP 78.27 (4) (d)
Would regular adult teaching staff in classrooms who carry medications in their purse comply with this secured storage section?	Yes , medication can be secured on your person.		ATCP 78.27 (4) (d)

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<p>Clarify about camp health service's use of a three-ring binder, is it acceptable for injury logs and treatment logs in addition to the medication logs, only if it is typed and printed online? Or could we print these sheets and write them in?</p>	<p>See below for the three options for documentation of medication and treatment provided.</p> <p>A three-ring binder could be utilized if a camp follows the requirements under option 3:</p> <ol style="list-style-type: none"> 1. In a bound book with preprinted page numbers. See fact sheet, What is a Bound Book. 2. By electronic entry into a software program that documents each change to the health record and that does not allow previous changes to the health record to be edited or deleted. 3. By making an electronic medication administration record, printed with the date and time stamp, from a health software program to be used for manual recording with a signature on the form of the individual making entries. 		<p>ATCP 78.27 (5) (b)</p>
<p>For rental groups that stay three nights or less, would it be acceptable to have the group fill out a standard incident report for any first aid treatment given during their stay?</p> <p>In regards to medications, we would like to create a medication log form where the parent is able to fill out the medication name, route, dose and time to administer before arriving at camp then the health supervisor would just initial when it is given and add the time. This form would be kept with the campers medications and saved for the required time. Would this be acceptable?</p>	<p>Rental groups designated to provide health services for any length of stay are required to comply with ATCP 78.27. See the written agreement contents, ATCP 78.16 (1) (c) 5. for documentation of medication <u>and treatments</u> for campers is pursuant to ATCP 78.27 (5) (b) that details the three options for documentation of medication and treatment that addresses both of your questions, loose pages would only be acceptable if they are printed from the camp's electronic health software per #2 here using option 3:</p> <ol style="list-style-type: none"> 1. In a bound book with preprinted page numbers. See fact sheet, What is a Bound Book. 2. By electronic entry into a software program that documents each change to the health record and that does not allow previous changes to the health record to be edited or deleted. 3. By making an electronic medication administration record, printed with the date and time stamp, from a health software program to be used for manual recording with a signature on the form of the individual making entries. 		<p>ATCP 78.27 (4) (f)</p>
<p>We serve campers with disabilities from an agency that sends</p>	<p>If this is a rental group using a camp's facilities and providing their own health services staff, they shall maintain the health histories and treatment records for their campers and staff, the records shall be</p>		<p>ATCP 78.27 (5) (f)</p>

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<p>their own nurse to administer the medication. Can we make a copy their medication documentation form and put it in our medication logbook or do we have to rewrite every medication that has been administered?</p>	<p>accessible, upon request from the department or its agent. No, the camp does not need to rewrite it.</p> <p>The responsibility for who provides health services is now required to be in a written agreement between the license holder camp and the incoming group, read more in ATCP 78.16.</p> <p>If the answer provided does not address your specific situation, and you need additional guidance, please reach out to the DATCP rec team inbox, datcpdfsrec@wisconsin.gov.</p>		
<p>Clarify what is considered a “treatment” such as an UW athletic camp where bags of ice, taping ankles, grip tape for hands that occur in the gym environment without an overall examination?</p>	<p>There is no definition in ATCP 78 for treatment. Address this clarification in the standing orders with camp physician or consulting physician.</p>		<p>ATCP 78.27 (5) (b)</p>
<p>If a counselor (not the health supervisor) applies first aid on a camper while walking the trails at camp, how should that be recorded in the bound book?</p>	<p>Yes, at the first opportunity when returning to camp. The counselor shall notify health services staff and the treatment provided shall be entered in the bound book or in the camp’s health software system. See ATCP 78.27 (5) (b). It is important that any treatment provided by camp staff is brought to the attention of health services staff and is accurately documented.</p>		<p>ATCP 78.27 (5) (b)</p>
<p>Do PRN meds that are given at the health center need a logbook? Are sheets of paper ok if the information is logged in the computer eMAR within an hour of administering the medication?</p>	<p>Yes, any medication administered shall be included in the medication and treatment log. The code itself does not specify a timeframe, however it does indicate as soon as possible health services staff shall make a record. See ATCP 78.27 (5) (b).</p> <p>Sheets of paper are ok if that information is logged into the health software system as soon as practical.</p>		<p>ATCP 78.27 (5) (b)</p>
<p>Where can I find the standardized form to report death, injury, or illness? If an ambulance responds for any injury no</p>	<p>Yes, the reporting in ATCP 78.29 is only for incidents associated with a camp activity on or off the camp premises that resulted in bodily harm. This also includes when an incident occurs by a rental group staying on premises. See s. ATCP 78.16 (1) (c) (12.), the written agreement with rental groups contents shall include: <i>The rental group has been informed</i></p>	<p>Link</p>	<p>ATCP 78.29</p>

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<p>matter who called, is it the camp's responsibility to report it. Whether the injured person is transported by EMS or not?</p>	<p><i>of the reporting requirements for death, injury or illness to the department or its agent as required pursuant to s. ATCP 78.29.</i></p> <p>If 911 is accidentally called and an ambulance responds to camp, there is no report needed.</p>		
<p>1. If a camp counselor has ambulatory services called does the DII form need to be completed? 2. What about maintenance staff mowing the grass that require 911 medical emergency?</p>	<p>1. Yes. The reporting in ATCP 78.29 is only for incidents associated with a camp activity on or off the camp premises that resulted in bodily harm.</p> <p>2. No. The reporting in ATCP 78.29 is only for incidents associated with a camp activity on or off the camp premises that resulted in bodily harm. Maintenance operations are not considered a camp activity concerning death, injury and illness data collected by the Department.</p>		<p>ATCP 78.29</p>
<p>Will using an unbound medication administration log for primitive trips and then uploading that documentation to an electronic program be allowed with the revised code or will they still need to provide a bound book for the primitive trips?</p>	<p>The bound book is still an option, but not the only option used for documentation of medical treatment and medication administration provided to campers while on primitive camping trips. Also, see alternative documentation method for primitive camping trips per s. ATCP 78.32 (2) (b) (2.) a.-d.:</p> <ul style="list-style-type: none"> <i>a. Required information pursuant to s. ATCP 78.27 (c).</i> <i>b. Maintain documentation of medical treatment including medications administered to campers while away from camp and submitted to the camp health services supervisor by the trip leader upon return to camp.</i> <i>c. Documentation from this record shall be transferred to the camps medication and treatment log and be made available for review by the department or its agent upon request.</i> <i>d. The original primitive camping medication and treatment documentation shall be kept by the camp health services supervisor and be made available for review by the department or its agent upon request.</i> 		<p>ATCP 78.32 (2) (b) (2.) a.-d.</p>
<p>How long does primitive camping medication and treatment documentation need to be kept for?</p>	<p>Record retention for medication and treatment records is required for at least three calendar years, see ATCP 78.27 (5) (e).</p>		<p>ATCP 78.32 (2) (b) & ATCP 78.27 (5) (e)</p>
<p>After using alternative methods to document medications while on a primitive trip, do you need to document in</p>	<p>The code does not address that, but it would be best practice to note in the system regarding the primitive trip as the reason why there is a gap from when the medication was administered to when it was recorded.</p>		<p>ATCP 78.32 (2) (b) (2.) a.-d.</p>

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<p>the approved records that the medication was dispensed on a primitive trip and the record was entered at a later time?</p>	<p>This would also be a good idea if you had to look back at previous year's medication and treatment logs in answering any questions pending legal matters.</p>		
<p>Should each camper have their own treatment log while on a primitive camping trip?</p>	<p>No, an individual camper log is not required. See ATCP 78.32 (2) (b) for acceptable methods to be used by camp staff for documentation of medical treatment and medication administration while off-premises camping.</p>		<p>ATCP 78.32 (2) (b)</p>
<p>1. If we print a medication log directly from eMAR, does it need to be in a bound book for primitive trips? 2. Can the log be placed directly with the camper's medications while on trip?</p>	<p>1. No, the bound book is still an option, but not the only option used for documentation of medical treatment and medication administration provided to campers while on primitive camping trips. Also, see alternative documentation method for primitive camping trips per s. ATCP 78.32 (2) (b) (2.) a.-d. 2. Yes, this would not be an issue as long as the medication and treatment log is secure and maintained in good condition.</p>		<p>ATCP 78.32 (2) (b)</p>

Tasks

This workflow created the following tasks. You can also view them in [Approval \(New\) Tasks](#).

Assigned To	Title	Due Date	Status	Related Content	Outcome
Sprecker, Troy S	Please approve 78changesQ and A DRAFT	1/29/2024	Completed	78changesQ and A DRAFT	Approved

Workflow History

The workflow recorded these events.

Date Occurred	Event Type	User ID	Description	Outcome
1/25/2024 9:52 AM	Workflow Initiated	Northwood, Andrea M	Approval was started. Participants: Sprecker, Troy S	
1/25/2024 9:52 AM	Task Created	Northwood, Andrea M	Task created for Sprecker, Troy S. Due by: None	
1/25/2024 5:07 PM	Task Completed	Sprecker, Troy S	Task assigned to Sprecker, Troy S was approved by Sprecker, Troy S. Comments:	Approved by Sprecker, Troy S
1/25/2024 5:07 PM	Workflow Completed	Northwood, Andrea M	Approval was completed.	Approval on 78changesQ and A DRAFT has successfully completed. All participants have completed their tasks.