

December 19, 2011  
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Jim McGowan, Executive Director  
California Building Standards Commission  
2525 Natomas Park Drive  
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**Subject: Proposed Express Terms for Title 24 Regulations regarding Public Swimming Pools, dated 10/5/11**

Mr. McGowan,

I have comments to make regarding the Title 24 Proposed Public Pool Regulations "Final Express Terms" that are dated October 5, 2011.

**Section 3120B.5 Artificial respiration and CPR sign.**

*An illustrated diagram with text at least ¼ inch (6 mm) high of artificial respiration and CPR procedures shall be posted.*

This requirement seems to make sense and to be reasonable according to modern emergency medical services practices and procedures. However, the requirement will cause confusion, it will waste resources, and it will not help to save the lives of drowning victims.

I have been a certified EMT since January 2006 and I am a strong advocate for CPR training. In fact, I was recently honored by being selected as the "2011 EMT of the Year" by the California Emergency Medical Services Authority due to my advocacy efforts for public CPR / Automated External Defibrillator programs, especially in California K-12 schools. However, in my opinion, it is not advisable to post signage for CPR procedures at every public swimming pool in California, as the updated section would require.

The proposed "CPR procedures" signage requirement raises several issues:

- 1) The proposed requirements to post instructions for "CPR procedures" do not specify a CPR procedure standard. The standard that should be used is the

“latest” CPR Guidelines published by the International Liaison Committee on Resuscitation (ILCOR), of which the American Heart Association is a member. [www.ilcor.org](http://www.ilcor.org). In addition, the ILCOR Guidelines for CPR tend to be updated every so often. The latest update occurred in 2010. By requiring that a sign be posted at every public swimming pool, the State of California is placing an extra burden for the pool operators to replace the signage every time that there is an update to CPR procedures.

- 2) The proposed requirements are vague. Does the State of California require detailed CPR procedures to be followed by someone who has never learned about CPR before, or would a shorter summary of CPR procedures be sufficient? Please refer to the attached “Adult CPR” (panel 6) and “Child and Infant” CPR (panel 7) instructional panels that are published by the American Red Cross. They are very detailed and it is helpful to also have the color photographs that illustrate the various steps.
- 3) CPR skills involve several steps. The skills required for CPR involve providing chest compressions, opening the airway, and providing rescue breathing (artificial respiration). It is necessary to learn the techniques in a hands-on class, which requires approximately three man-hours to complete. For lay rescuers the training must be repeated every two years. It is not advisable to post detailed CPR procedural instructions from such a class on a sign with the expectation that any person can read the instructions and then apply CPR skills to a drowning victim. In addition, if the CPR procedure instructions are too detailed, then the rescuer will spend too much time reading the instructions – while the patient is lying on the ground and not receiving life-saving care.
- 4) There are three types of CPR: The techniques for CPR chest compressions are different for adults, for children, and for infants. The techniques are different because they require different depths of compressions that correspond to different levels of force on the chest. If “CPR Procedure” instructions are to be posted, then they must cover all three types of CPR.
- 5) The Language to post CPR procedure instructions in: It is assumed that the posted CPR instructions will be English. What about in Spanish? And what about all of the other languages that Californians may be familiar with? It is not practical to post CPR instructions at every public swimming pool in California in English-only because so many people will be excluded from the information. And to post the instructions in more than one language will be expensive and burdensome on the swimming pool operators.

## So what should be done instead?

As I suggested in a previous letter, the signage should include a copy of the American Heart Association's (Adult) "Cardiac Chain of Survival." It is a visual graphic that can be understood by anyone, regardless of the language spoken.

The first link of the chain has a graphic of a telephone. This prompts the person to contact 911 or the local EMS provider. At the other end of the phone there will be a dispatcher. Many medical dispatchers in the State of California have the ability to talk someone through providing CPR skills, even if the person providing the care has never taken a CPR class before. In my opinion, it is preferable to rely on emergency medical dispatchers to provide oral CPR instructions – than to expect a bystander to read a lot of complicated text in order to learn CPR skills and then be expected to apply those skills to the patient.

Instead, the emergency medical dispatcher can provide the proper instructions step by step. This will lead the rescuer to the second link in the AHA Chain of Survival, which is "CPR." And if the rescuer experiences a problem, then the dispatcher can help the rescuer to work through it or around it. In addition, if the rescuer speaks Spanish or some other language, then it is likely possible to transfer the initial call to an emergency medical dispatcher who can speak the same language as the rescuer. Once CPR has been established, then the dispatcher can ask if there is an Automated External Defibrillator (AED unit) available. If one is available, then the rescuer can move to the third link in the chain, which is for "defibrillation."

In my previous correspondence, I had suggested that instructions be posted for "Hands-only CPR." However, according to the attached "Highlights of the 2010 American Heart Association Guidelines for CPR and ECC," Hands-only CPR is not recommended for drowning victims. Drowning victims require "conventional" CPR to include rescue breathing and chest compressions, whereas Hands-only CPR only involves chest compressions. On page 6 of the attached AHA Guidelines it is stated:

*Dispatchers should provide instructions in conventional CPR for victims of likely asphyxia arrest [e.g. drowning].*

Therefore, that suggestion was not in agreement with the AHA Guidelines. Please disregard it.

In my opinion, relying on Emergency Medical Dispatchers to provide the proper verbal coaching is one solution to the issue at hand. Requiring signage for detailed "CPR procedures" will be impractical and ineffective. Requiring detailed signage for CPR procedures will not save lives. We already have 911 systems and emergency medical dispatchers in place throughout the state – and that is the way to save the lives of drowning victims. Thus, we already have the necessary resources and we can and should use them to their full potential via simple signage in order to activate the local 911 system.

If the California Department of Public Health is committed to posting "CPR Procedure" signage at California public swimming pools, then I would suggest that the American Heart Association and the American Red Cross be consulted. If universal signage can be developed to be shared with the public pool operators in a convenient way, such as via a website, then that may create a viable solution to the various issues I have raised.

Thank you for your consideration.

Sincerely,



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**Attachments:**

- 1) "Highlights of the 2010 American Heart Association Guidelines for CPR and ECC"
- 2) American Heart Association (Adult) "Cardiac Chain of Survival" (also on page 2 of Guidelines)
- 3) Section 3120B.5 Artificial respiration and CPR sign, page 58, "Final Express Terms for Proposed Building Standards..." Revised 10/5/11.
- 4) California EMS Awards Program, 12/7/2011, "EMT of the Year"
- 5) "Adult First Aid / CPR / AED Ready Reference," panel 6, copyright 2011
- 6) "Pediatric First Aid / CPR / AED Ready Reference," panel 7, copyright 2011

**Copies to:**

Howard Backer, Director, California EMS Authority  
Robin Belle Hook, REHS, Environmental Health Services Section Chief  
Linda Mayo, VP of Health, California State PTA  
Barry Brokaw, American Red Cross  
Jamie Morgan, American Heart Association