



July 9, 2021

Dear Governor Cuomo,

The NY Water Safety Coalition and the United States Swim School Association wholly and enthusiastically support S.7129 Kennedy/A.7734 Amato which establishes a Commission to study childhood drowning prevention and improve safety in NYS bathing and swimming venues. **This work is essential as drowning is the number one killer of children under four, over every other form of accidental death.** If you sign this bill and the Commission is created, New York will take a crucial step towards addressing childhood water safety.

We are a growing coalition of seven privately-operating swim schools throughout the state. Swim Schools instruct an estimated 50,000 students annually providing a major resource to parents for childhood water safety. This document addresses the Commission's outline, and offers knowledge that can make the Commission more effective for all New Yorkers.

**Appropriate Age/Content:** The American Academy of Pediatrics (AAP) states that “five major [drowning prevention] interventions are evidence-based: 4-sided pool fencing, life jackets, swim lessons, supervision, and lifeguards<sup>1</sup>.” The policy statement also says, “To protect their children, parents need to think about layers of protection. **Children need to learn to swim.** Swimming lessons can be an important part of the overall protection.” The AAP further states that new evidence shows that children ages 1 to 4 have significantly less drowning risk after formal swimming instruction. From our decades of experience and results we support these statements. We also know that water acclimation as young as 2 months significantly improves a child’s readiness for swim lessons. Early intervention works.

**Statewide Standards:** The United States Swim School Association (USSSA) partners with the National Drowning Prevention Alliance as well as other drowning prevention associations and safety programs. All USSSA members adhere to a national Code of Ethics,<sup>[3]</sup> with a focus on integrity and service to the lives of their students, communities, and the public at large. The Code also requires members to thoroughly screen, train, and qualify their teams to work with the public. The USSSA recently developed minimum standards<sup>2</sup> for members and also endorses the International Swim Schools Association Position Statement on Minimum Standards for Swim Schools.<sup>3</sup> Swim schools differ from the public park and recreation pools in that our swim instruction is our sole focus.

**Incentivizing Parents to Enroll Students:** As experts in learn-to-swim and drowning prevention, our national network of experts can share best practices, including other state initiatives with organizations specializing in drowning prevention. For example, Florida is testing a program where insurance companies cover a portion of swim lesson fees. Florida also recently passed a bill that will have public schools inquire at kindergarten registration if the child has had swim lessons. A “yes”, offers an opportunity to upload a certificate. A “no” means the parent receives a list of local swim lesson providers. The national Water Smart Babies program offers pediatricians resources encouraging new parents to get swim lessons for their babies.<sup>4</sup> We are working with the AAP’s NYC chapters to roll this out locally.

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<sup>1</sup> [American Academy of Pediatrics Journal : Drowning Prevention](#)

<sup>2</sup> [US Swim School Assn : Minimum Membership Standards](#)

<sup>3</sup> [International Swim School Assn : What to Look For In A Swim School](#)

<sup>4</sup> [Water Smart Babies Program](#)

**Public Private Partnerships:** Access to pools is a critical hurdle which prevents children particularly in underserved communities from learning to swim. Because of pools' specialized technical needs and costs, many pools in public schools have been closed. Other forms of public access have been unintentionally undeveloped or reduced. We see opportunities that could change that. As the commercial property landscape in New York is rapidly evolving, tax incentives for commercial properties that install pools may be very successful. These facilities could include swim lessons and we have other models to further offset developer and taxpayer costs. A second opportunity is for New York State to subsidize the transportation to swim lessons for the underserved. Capacity and access is the issue here.

**Ensure Instruction in Underserved Communities:** As mentioned above, these strategies will take a village to accomplish and will rely heavily on public-private partnerships. A number of nonprofits help organizations offer learn-to-swim scholarships. Others focus specifically on young POC people. New York State grants offered to these organizations would increase access for underserved New York children and families.

**Employment and Vocational Training Opportunities:** This time each year, the media reports the shortage of lifeguards nationally and in New York State. This is particularly dire in New York State as lifeguards on-duty are required at all public bathing establishments<sup>5</sup>. Our coalition can offer training, education and employment opportunities in lifeguarding, which can lead to careers in public safety, health and athletics. Underserved communities will benefit most from these initiatives and can support public-private partnerships mentioned above.

**Public Awareness Campaign:** Many resources exist for educating the public about drowning prevention. The key is consistent ongoing distribution to the public. Imagine a Smokey the Bear for drowning risk awareness. Imagine the success of seatbelt, anti-smoking and nutrition campaigns. The AdCouncil tells us that drowning prevention is a social problem they could support effectively. Facts we provided the AdCouncil are that drowning is consistently the leading cause of death for kids aged one to four; it is also a leading cause of death for POC youth.<sup>6</sup> Stop Drowning Now works with California community leaders via their No Drown Town grassroots program.<sup>7</sup> New York communities can utilize these educational tools until kids receive swimming lessons. Drowning can happen in an instant. It is silent. It is not like a Baywatch dramatization. Nine out of ten drowning deaths happen when a supervising caregiver is not paying attention. 77% of at-home drowning accident victims were missing for less than five minutes. New Yorkers do not know these facts. Consider how these important messages in public awareness campaigns can save lives.

The NY Water Safety Coalition urges you to sign the bill into law. We ask that the Commission include all stakeholders in water instruction, including private swim schools.

We request that our Coalition be included on the Commission. We request a meeting with you or a member of your team to show you how we can help reduce childhood drowning.

With thanks, gratitude and respect,

The New York Water Safety Coalition

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<sup>5</sup> [NY Post : NYC Hit By Lifeguard Shortages](#)

<sup>6</sup> [American Academy of Pediatrics Drowning Prevention Toolkit](#)

<sup>7</sup> [Stop Drowning Now Cities Drowning Prevention Program](#)