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10/20 Protection Rule – Make It Work For You

Volume 4 Issue 4 (2001)

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Lifeguards must scan their zone of coverage in 10 seconds and respond to persons in need within the next 20 seconds. The “10/20 Protection Rule” (1) attempts to set a black-and-white standard for lifeguard surveillance at public pools. Arguably, lifeguards who cannot scan every person within their zone of coverage within 10 seconds or who cannot get to a person in distress within 20 seconds are not providing proper protection. This rebuttable presumption, which traces back to the 1970s and 1980s, has since been adopted by at least one lifeguard training agency and has even found its way into state health codes where it now forms part of the local standard of care. But is codification of the 10/20 Rule reasonable, and how does this rule come into play following an incident?

The 10/20 Rule is a two-pronged approach to reduce drowning rates by enforcing a vigilant surveillance standard while also positioning lifeguards for rapid response to an incident. Aquatic facility managers faced with codification of the 10/20 Rule must find a way to measure whether lifeguards can meet the requisite standards. While I am not aware of any litigation that has centered on the applicability or enforcement of the 10/20 Rule, aquatic-facility managers nevertheless must make reasonable attempts to document their compliance with the local health code.

By incorporating the 10/20 Rule into a standard method of scanning, such as the 5-Minute Scan (2) developed by Dr. Tom Griffiths of Penn State University, you will demonstrate an attempt to not only comply with the state code, but also an effort to keep lifeguards alert and focused on the task at hand. Lifeguards who proactively scan their zones and change their posture and position every five minutes send a very professional message to pool patrons. While patrons may not recall whether lifeguards were scanning their zone every ten seconds, they will undoubtedly remember that the lifeguards' heads were moving and that the lifeguards chose to sit, stand or stroll in frequent intervals.(3)

In states that have codified the 10/20 Rule (such as Texas), aquatic-facility managers must take steps to ensure that their lifeguards not only understand the meaning of the 10/20 Rule, but that they also know how to practice it while scanning. Lifeguards must be able to scan their zones within 10 seconds, and this includes not only the people on the surface of the water, but those beneath the surface as well. Scanning a zone may take more than 10 seconds either when distances between stations are too great or when bather loads are too high. In these instances, lifeguards must be trained to request backup coverage to assist in patron surveillance.

To help monitor that lifeguards are scanning their zones within the allotted time period, aquatic-facility managers can simply watch the heads of the lifeguards. A lifeguard's head, not just their eyes, should be moving from side to side. Scanning a zone should not take longer than 10 seconds. Do not forget to watch whether lifeguards check the spot directly beneath their lifeguard station. This “blind spot” takes extra effort to monitor. Also, remember to train lifeguards to look through the water and scan from the bottom up. It is

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not enough to just look at those people on top of the water – sometimes a guard will notice someone struggling underwater. Some of these victims, such as a small child who falls into deep water and cannot resurface will make no noticeable sound or cry for help.

The second element of the 10/20 Rule is that lifeguards must be able to respond to a victim in distress within 20 seconds. This requires that lifeguard stations be positioned so a lifeguard can reach all areas of his or her zone within 20 seconds. In recent years we have seen a decline in the swimming abilities of many lifeguard applicants. Many novice lifeguards lack the strength and speed required to meet the 20-second requirement. It is therefore incumbent upon managers to train and condition lifeguards to become stronger and faster swimmers, especially when working in a waterpark environment where wave pools create surf-like conditions. Routine inservice training should help strengthen weaker lifeguards and enable them to swim their zone within 20 seconds. Finally, document all inservice training to help record each lifeguard's progress. This will help provide strong documentation of the lifeguard's swimming ability as well as his or her ability to meet the time requirement.

Aquatic-facility managers should prescreen all lifeguards and assess each lifeguard's knowledge, skills, and abilities prior to their hiring. Lifeguards with weak swimming skills should be stationed in shallow water areas (for instance, in or around play structures and winding rivers) or these lifeguards should be assigned smaller zones of coverage until they demonstrate the ability to meet the 20-second requirement. In most adequately staffed pool facilities, however, the 20 second requirement should not prove problematic, as the average lifeguard should be able to swim a distance of 25 yards (the length of a standard competition pool) in under 20 seconds.

Following an incident at an aquatic facility, it is unlikely that each second of a rescue will be analyzed. In fact, without video monitoring at the time of the incident, it will be extremely difficult to go back and try to prove that a lifeguard scanned a zone in ten seconds or swam to a victim within 20 seconds. Thus, the 10/20 Rule will never be the sole or main issue litigated in a case. There will always be a greater issue of negligence that will take precedence. For these reasons, I will argue against writing the 10/20 Rule into state codes. There is really no way to affirmatively prove that lifeguards are meeting the standard. The best that aquatic managers can do is to train staff in what the 10/20 Rule means and establish zones that are reasonably sized so lifeguards can respond rapidly to an incident.

In the case of prolonged submersions, it will be obvious that the lifeguards were not providing proper coverage. In an aquatic facility, there is no reason why a lifeguard should miss a body underwater if properly scanning his or her zone. Further, cases reinforce the fact that most drownings at facilities that provide lifeguard services occur because the lifeguards failed to recognize persons in distress were assigned secondary duties that interfered with scanning or were distracted by friends, patrons, phone calls etc (4) . In these cases, again it is obvious that lifeguards were not providing proper coverage, thus obviating the need to further breakdown the time element.

Given all of this, Dr. Griffiths agrees that three key strategies come into play in providing proper coverage. The 5-Minute Scan is a useful tool to teach lifeguard how to scan and keep them alert and focused on the job. The 10/20 Rule becomes an important training tool for lifeguards to use while scanning. Lastly, the RID Factor (Recognition, Intrusion, Distraction) is the why of scanning. With proper documentation and training in these three areas as part of your standard pre-service training program, you will not only help make your pool a safe area for swimming, but you might also save a life.

1 The phrase "10/20 Protection Rule" is copyrighted by Ellis and Associates, Inc.

2 Copyright 2000 Tom Griffiths, Ed.D.

3 "Sit, Stand and Stroll" is a strategy for altering lifeguard posture as advocated in the 5-Minure Scan.

4 RID Factor, Frank Pia 1972.