



Emergency Plan Deficiency Letter

133010 – Camp Mystic Inc

Dear Camp Director,

This correspondence serves to notify you of the findings from the compliance review conducted for your camp's Emergency Plan that was submitted with your application for licensure. The review was conducted in accordance with newly established requirements found in Texas Health and Safety Code, Chapter 141, also known as the Texas Youth Camp Safety and Health Act, and the Texas Youth Camp Safety and Health Rules, Title 25 Texas Administrative Code Chapter 265, Subchapter B.

The review determined that while your camp has complied with certain requirements, several areas require attention to meet full compliance.

Audit Category	Code Reference	Deficiency	Recommendation
Floodplain Location	HSC §141.0052	Missing	Section 1.2 Camp Footprint, Facilities, and Operational Assumptions states, "The official floodplain map, camp-specific site overlay, and current labeled muster zone/evacuation map shall accompany this plan and be maintained together in the EAP Compliance Binder for inspection and use." The FEMA floodplain map is required to be submitted with the EAP or provided as an attachment. The FEMA floodplain map needs to clearly provide an outline of the campground property and clearly identify each cabin in relationship to the floodplain and floodway (if indicated). Revise the plan to include: -Map of location of cabins showing compliance with requirements (not within a floodplain) or -If within a floodplain, map of camp area with cabins in relationship to floodway (1,000 feet away)
Designated Emergency Preparedness Coordinator	HSC §141.0091	Insufficient	Section 2.2.1 Designation of Camp Emergency Preparedness Coordinator (EPC) states that the camp "shall" designate a Camp Emergency Preparedness Coordinator

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			(EPC). Section 2.3 Chain of Authority and Succession identify Glenn A. Juenke as the EPC. The statements are somewhat conflicting and EPC contact information is missing. Revise the plan to include: -Identify name and/or position and contact information for EPC
Fire Plan	HSC §141.0091	Insufficient	Section 5.15 Fire Response Procedures and section 5.16 Wildfire and Brush Fire Response Procedures do not comprehensively address all required elements within the fire response section. Staff responsibilities are not assigned to specific roles beyond general staff, and key command roles are not defined. Additionally, muster zones, coordination with local authorities, and parent/guardian notification are not clearly included or referenced within this section for ease of use during an emergency. Revise the plan to include: -Staff responsibilities in a fire emergency -Evacuation procedure in the event of a fire and identification of muster zones -Process for coordination with local authorities (9-1-1) and emergency management -Process for notification of family/guardian
Severe Injury/Severe Illness/Serious Injury/Death Plan	HSC §141.0091	Insufficient	Section 6: Medical Emergency and Mass Casualty Response Procedures and Section 6.7 Serious Accident or Death Response Procedures do not clearly assign responsibility for initiating 9-1-1 contact. Section 6.5 Emergency Medical Services (EMS) Activation states EMS "shall" be activated immediately when Directed by the Medical Lead or IC but does not state the staff to which the direction is provided to. Section 2.2 Incident Command Structure states under the Duties of the Camp Emergency Preparedness Coordinator, "Coordinate emergency communication procedures with local emergency-management services, camp administrative

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			staff, camp medical staff, and parents or legal guardians of affected campers” but local emergency management services are not defined as fire, law enforcement, or EMS as being initiated by 9-1-1 contact. This lack of role clarity may delay emergency response and impact timely coordination with emergency services. The plan becomes disjointed to a user when complete instructions are not included within each hazard section. Revise the plan to include: -Process for coordination with local authorities (9-1-1) and emergency management
Aquatic Emergency Plan	HSC §141.0091	Insufficient	Section 6.15 Aquatic Emergency Response Procedures does not comprehensively address all required elements within the aquatic emergency section. The plan does not assign responsibilities to specific roles or identify trained personnel. Key command roles are not referenced, and processes for coordination with local authorities and parent/guardian notification are not clearly included or referenced within this section to ensure staff can rapidly execute assigned responsibilities with clearly defined roles and expectations during an incident. Revised the plan to include: -Staff responsibilities during aquatic emergencies -Process for coordination with local authorities (9-1-1) and emergency management -Process for notification of family/guardian
Epidemic Plan	HSC §141.0091	Insufficient	Section 6.16 Epidemic or Outbreak Response Procedures does not comprehensively address the criteria below. The plan does not address staff use of personal protective equipment and does not clearly define reporting, coordination, or parent notification processes with assigned roles. Required actions are described but are not clearly included or referenced within this section for

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			ease of use during an emergency. Revise the plan to include: -Staff use of personal protective equipment -Isolation process -Reporting process for contagious diseases -Process for coordination with local health authorities and emergency management if warranted -Process for notification of family/guardian
Unauthorized Individual Plan	HSC §141.0091	Insufficient	Section 8: Active Threat and Security Response Procedures contain an incorrect reference to Section 3.6.2 (Pg.40), which does not exist, potentially impacting usability during an emergency. The plan needs to be updated to correct or remove the reference and to ensure all internal references are accurate and correspond to existing sections for clarity and usability. This section does not include how to identify an authorized vs unauthorized person (e.g., visitors wear visitor badge or wristband, visitors are accompanied by staff, camp staff wear uniform shirts). Revise the plan to include: -Plan details a process for identifying unauthorized individuals
Transportation Emergency Plan	HSC §141.0091	Incomplete	Plan does not clearly assign responsibility to specific roles for initiating 9-1-1 contact or parent/guardian notifications and is not clearly defined within this section for ease of use during an emergency. Again, the plan is disjointed without even a reference to a section that states who is responsible for these actions. Revise the plan to include: -Process for coordination with local authorities (9-1-1) and emergency management -Process for notification of family/guardian
Natural Disaster Plan	HSC §141.0091 HSC §762.002	Insufficient	Plan does not clearly delineate staff responsibilities, as responsibilities are not consistently assigned to specific roles across disaster types. Additionally, coordination with local authorities (9-1-1) and parent/guardian

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			notification are not clearly defined or consolidated within a single, accessible section to support timely execution during an emergency. Revise the plan to include: -Staff responsibilities during natural disaster emergencies -Process for coordination with local authorities (9-1-1) and emergency management -Process for notification of family/guardian
Flash Flood Warning Evacuation Plan	HSC §762.002	Insufficient	FEMA floodplain map not submitted. The FEMA floodplain map is required for campgrounds with any part of the property within a floodplain. If the submitted floodplain map identifies campground property and cabins are not located within a floodplain this finding can be revised to N/A. The plan does not fully address all required evacuation elements within the flood and flash flood response section. While general evacuation actions are described (Section 5.7, Pg. 26), the plan does not clearly define the process for assisting persons with disabilities and others with access and functional needs. Appendix E includes procedures for assisting campers who are deaf or hard of hearing during nighttime evacuation; however, the plan does not address other disability types (e.g., mobility, visual) or daytime evacuation conditions. The plan should include clearly defined procedures for assisting individuals with access and functional needs, such as assigning specific staff to provide assistance, establishing a buddy system, ensuring accessible evacuation routes, accommodating assistive devices, addressing transportation needs, and ensuring emergency warnings are accessible. Revise the plan to include: -Evacuation route maps -Staff responsibilities during the evacuation -Process for assisting persons with disabilities

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			and others with access and functional needs to evacuate -Process for accounting for campers at assembly location -Notification process for families -Coordination process for requesting transportation in an emergency if camp resources are not available -Process for evacuating campgrounds and notification of authorities (9-1-1) and emergency management -Reunification plan for families and campers
Evacuation Plan	HSC §762.002	Insufficient	Section 4: Evacuation, Shelter-in-Place, and Accountability Procedures does not assign staff responsibilities consistently to specific roles, and key actions such as initiating evacuation, contacting emergency services, and coordinating parent/guardian notification are not clearly defined within this section or explicitly assigned, limiting usability during an emergency. Additionally, the plan does not clearly define the process for assisting persons with disabilities and others with access and functional needs. While Appendix E includes procedures for assisting campers who are deaf or hard of hearing during nighttime evacuation, it does not address other disability types (e.g., mobility, visual) or daytime evacuation conditions. The plan should include clearly defined procedures for assisting individuals with access and functional needs, such as assigning specific staff to provide assistance, establishing a buddy system, ensuring accessible evacuation routes, accommodating assistive devices, addressing transportation needs, and ensuring emergency warnings are accessible. Revise the plan to include: -Staff responsibilities during the evacuation -Process for assisting persons with disabilities and others with access and functional needs to evacuate -Notification process for families

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			-Coordination process for requesting transportation in an emergency if camp resources are not available -Process for evacuating campgrounds and notification of authorities (9-1-1) and emergency management
Evacuation Plan for NWS Notice	HSC §762.002	Incomplete	Section 4: Evacuation, Shelter-in-Place, and Accountability does not assign responsibility to specific roles for initiating evacuation or contacting emergency services and is not clearly defined within this section for ease of use during an emergency. Revise the plan to include: -Process for evacuating the campground upon issuance of a flash flood warning issued by the National Weather Service -Coordination with local authorities (9-1-1) and local emergency management
Shelter in Place Plan	HSC §762.002	Incomplete	Section 4: Evacuation, Shelter-in-Place, and Accountability Procedures does not clearly assign responsibilities to specific staff roles or identify command authority for initiating and managing shelter-in-place operations. Additionally, shelter-in-place procedures and locations are not clearly defined within this section, limiting the ability of staff to rapidly execute assigned responsibilities during an incident. Revise the plan to include: -Process for sheltering in place upon issuance of a tornado warning or shelter in place order by local emergency authority -Staff roles at shelter in place location and process for accounting for all campers in shelter
Cabin Ladder	HSC §762.002	Incomplete	FEMA floodplain map not submitted. The FEMA floodplain map is required for campgrounds with cabins located in a floodplain. If the submitted floodplain map identifies cabins are not located within a floodplain this finding can be revised to N/A. The plan should include clearly defined procedures for assisting individuals with access and functional needs, such as

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			assigning specific staff to provide assistance, establishing a buddy system, ensuring accessible evacuation routes, accommodating assistive devices, addressing transportation needs, and ensuring emergency warnings are accessible. Revise the plan to include: -Identify location, type and specification of emergency ladder (fixed exterior, roof access, fixed stair combination, interior latch, or free standing) -Affirm staff have training in ladder use and assisting individuals to use ladder -Contains back up plan for individuals who are unable to utilize ladders (due to age, disability, etc.)
Emergency Plans to Staff	HSC §141.0091	Missing	Plan does not clearly define the process for providing a copy of the Emergency Plan to staff and volunteers or assign responsibility for distributing it. Revise the plan to include: -Process for providing a copy of Emergency Plan to staff and volunteers
Parent Notification of Floodplain	HSC §141.0091	Insufficient	Section 2.6 External Communications Protocols; subsection Parent and Guardian Communications; item 2. Issue of floodplain notice when required states, "If any area of the CMCL campus is located within a floodplain, provide written notice of that condition to the parent or legal guardian of each camper described above." This does not meet the criteria below. FEMA floodplain map not submitted. The FEMA floodplain map is required for campgrounds with any part of the property within a floodplain. If the submitted floodplain map identifies campground property and cabins are not located within a floodplain this finding can be revised to N/A. Revise the plan to include: -Process for notifying parents/guardians if any part of the camp is located within a floodplain -Process for maintaining forms and

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			acknowledgement and who is responsible for this
Parent Emergency Plan Provision	HSC §141.0091	Incomplete	Plan does not define the process, including the method (e.g., provide hard copy in person, email PDF copy) and timing of EP distribution. Revise the plan to include: -Process for providing emergency plans to the parents or guardians participating in a camp session or a prospective camper who is registered to participate in a future camp session
Emergency Warning System / Public Address System	HSC §141.0091	Insufficient	Plan does not identify specific staff responsible for maintaining and operating the emergency warning system, including backup personnel. Section 3.2.1 Emergency Warning System states that CMCL "shall" install, maintain, and keep an emergency warning system in operable condition; however, the plan does not affirm that the camp has and maintains an emergency warning system. Additionally, while Appendix E includes procedures for assisting campers who are deaf or hard of hearing during nighttime evacuations, the plan does not clearly define the process for alerting individuals who are deaf or hard of hearing to emergency warnings. For this category that includes criteria for providing a warning system capable of alerting all occupants, including those who are deaf or hard of hearing, consider including statements that validate how warnings are communicated to these individuals. This may include the use of one-to-one notification (e.g., assigned staff or runners) or visual alerting methods such as flashing lights. Revise the plan to include: -Affirm the camp has a working emergency warning system capable of alerting all occupants of an emergency, including those who are deaf or hard of hearing -Identify staff responsible for maintaining emergency warning system

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			-Identify staff responsible for operating the alert system and back up if that staff is unavailable
Monitoring Safety Alerts	HSC §141.0091	Insufficient	Section 3.2 Emergency Warning, Weather Alerting and Hazard Monitoring and section 3.2.3 Hazard Monitoring and Escalation Procedures do not clearly designate specific staff responsible for monitoring safety alerts or define a detailed process for communicating alert information to appropriate staff and administration. Section 3.2.3 Hazard Monitoring and Escalation Procedures states that the camp “shall” monitor National Weather Service (NWS) alerts and other emergency notifications; however, the plan does not affirm that the camp is actively monitoring these alerts. Revise the plan to include: -Process for monitoring safety alerts, including who is responsible for monitoring safety alerts, and how that information is relayed to appropriate staff and administration
Operable Radio	HSC §141.0091	Insufficient	Plan does not clearly identify specific staff responsible for monitoring and maintaining the weather-alert radio system or define how alert information is relayed to appropriate staff and administration. Section 3.2.2 Weather Alert Radio Requirement states that the camp “shall” maintain operable weather-alert radios onsite; however, the plan does not affirm that the camp has and maintains a weather-alert radio. Revise the plan to include: -Identify staff responsible for maintaining radio and how that information is relayed to appropriate staff and administration
Internet Service / Broadband Service	HSC §141.0092	Incomplete	Section 3.2.4 Broadband and Internet Continuity does not specify staff responsible for monitoring and maintaining internet services. Revise the plan to include: -Identify which staff is responsible for monitoring internet services

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Camper Safety Training	HSC §141.0091	Incomplete	Section 9: Staff Training, Drills, and Compliance Documentation does not clearly assign responsibility to a specific staff role for delivering and updating camper training and is not clearly defined within this section to ensure staff can rapidly execute assigned responsibilities without ambiguity during an incident. Revise the plan to include : -Training is developmentally appropriate instruction for the campers receiving the training (age, reading level, comprehension level) and details staff responsible for providing training and updating training when needed

This review is based only on the documentation submitted and evaluates alignment with applicable statutory requirements. It will include compliance notes and recommendations for deficiencies identified. The assessment does not verify operational capability, staff training, or real-world implementation. Responsibility for implementation, operational readiness, and compliance remains with the camp operator.

We recommend addressing these issues promptly and resubmitting the corrected Emergency Plan within 45 days. Please use the "[Corrective Actions](#)" folder to submit your corrected Emergency Plan.

We appreciate your commitment to providing a safe and enjoyable environment for campers. If you have questions or need assistance in implementing these recommendations, please contact the Youth Camp Program at 512-834-6788 or PHSCPS@dshs.texas.gov.

Sincerely,
Youth Camp Program
Texas Department of State Health Services