



February 3, 2021

The Honorable William C. Smith  
Senate Judicial Proceedings Committee  
2 East Miller Senate Office Building  
11 Bladen Street  
Annapolis, Maryland 21401

**Re: Consideration of the International Swimming Pool and Spa Code**

Dear Chairman Smith:

This letter is in regard to the state of Maryland's consideration of the International Swimming Pool and Spa Code (ISPSC). The Pool and Hot Tub Alliance (PHTA) (formerly the Association of Pool & Spa Professionals (APSP)) partnered with the International Code Council (ICC), the body responsible for many of our national building codes, to create the first ever national code for swimming pools and spas in 2012.

According to a 2015 Maryland Department of Health report, drowning was the 2nd leading cause of death for children 0-4 and the third leading cause of death for children aged 5-14. While most Jurisdictions in Maryland have some form of existing pool and spa regulations, most lack a comprehensive code or laws that address design, construction, and safety of pools and spas leaving a patchwork of regulations across Maryland. SB 254 will remedy this by adopting the International Swimming Pool and Spa Code (ISPSC) which is the only code that is coordinated and correlated with the other building codes adopted in Maryland. The ISPSC is the first national code for swimming pools and spas ever created and the only code to address all aspects of public and residential pool and spa design and construction addressing quality, safety, and energy and conservation.

The ISPSC will establish minimum regulations for public and residential pools, spas, and hot tubs using prescriptive and performance-related provisions. Additional benefits of the ISPSC include:

- Seamless integration with the most widely used model codes in North America, the International Building Code® (IBC®) and International Residential Code® (IRC®).



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- Meets or exceeds the requirements of the federal Virginia Graeme Baker Act for suction entrapment avoidance.
- Covers fencing, decks, lighting, heaters, circulation systems, pumps, accessibility, diving, sanitizing equipment, filters, and suction fittings.
- Includes provisions for pools and facilities geared specifically for water parks, along with provisions based on the latest research for diving, barriers, general design, and water quality safety.
- All necessary provisions in one book. The ISPSC combines the provisions of the relevant sections of the IRC, IBC, IPC®, and IMC®, and the APSP standards, serving as a fully-integrated document for pool and spa safety.

We look forward to positive consideration of the ISPSC in Maryland and hope to be of assistance in your code development process.

Sincerely,

Jason Davidson

PHTA, Director of Government Relations

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#### About Us

The Pool & Hot Tub Alliance was formed in 2019, combining the Association of Pool & Spa Professionals (APSP) and the National Swimming Pool Foundation (NSPF). With the mission to “Celebrate the Water,” PHTA facilitates the expansion of swimming, water safety and related research and outreach activities aimed at introducing more people to swimming, making swimming environments safer and keeping pools open to serve communities.

APSP, now the PHTA, is the world’s oldest and largest association representing swimming pool, hot tub, and spa manufacturers, distributors, manufacturers’ agents, designers, builders, installers, suppliers, retailers, and service professionals. Dedicated to the growth and development of its members’ businesses and to promoting the enjoyment and safety of pools and spas, PHTA offers a range of services, from professional development to advancing key legislation and regulation at the federal and local levels, to consumer outreach and public safety. PHTA is the only industry organization recognized by the American National Standards Institute to develop and promote national standards for pools, hot tubs, and spas. For more information, visit [APSP.org](http://APSP.org) or [NSFP.org](http://NSFP.org).



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