



# NCAP Circular No. 23

NCAP elevates camps to new levels of excellence...

National Council, Scouting America

January 13, 2025

## Demonstrating Compliance with Standards PS-213/214

In **NCAP Circular No. 21**, the National Camp Accreditation Program (NCAP) announced that Scouting America had undertaken a comprehensive review of range and target activities, formerly known as shooting sports, that Scouting America provides as part of the Scouting program for youth. That review concluded:

The purpose of Scouting America's range and target activities is, first and foremost, centered around teaching range and firearm safety. Scouting America's range and target activities are developed and implemented through age-appropriate training and experiences. Scouting America adheres to a longstanding policy of teaching its youth and adult members the safe, responsible, and intelligent handling, care, and use of firearms, archery, slingshots, and hand-held throwing sports through planned, carefully managed, and supervised programs for each youth who chooses to participate.

Additionally, Scouting America believes that participating in range and target activities provides Scouts the opportunity to learn responsibility, self-discipline, problem solving, concentration, sportsmanship while acquiring lifelong skills and possible hobby interest.

Given that Scouting America's interests are centered on introducing the safe handling of firearms, bows and arrows, slingshots and similar hand-thrown sports, Scouting America is implementing the following program adjustments to simplify range and target activities

focusing on a safe and quality program and enhancing the overall experience for Scouts and Scouters alike when participating in these activities.

In **NCAP Circular No. 23**, NCAP is providing further guidance to councils on how to demonstrate compliance with revised Standards PS-213 and PS-214 while reducing the demonstration burden as much as possible.

### Brief Summary of Revised Standards PS-213 and PS-214

In general, both Standard PS-213 and Standard PS-214 require the council to identify acceptable ranges; supported program and equipment types; and ensure that Standard Operating Procedures (SOPs) are adopted for each council operated range whether at a camp property or a camp. If a specialty program will be offered, the Standards require the council to take additional steps, including a risk review and listing the specialty program in the Intent to Operate filed with the National Council, to ensure that the program can be offered safely and appropriately.

**Standard PS-213.** There are four major questions that a council must decide about the archery and throwing sports it will offer. These are:

1. Will the council authorize archery and throwing sports at "off-camp property" events and, if so, which types of activities will be allowed? Some throwing sports lend themselves well to performance at short-term camps and events not held at a camp property.

2. Will the council authorize the use of "compound bows" at all, some or none of its ranges and activities? Standard PS-213 requires a risk assessment pursuant to Standards PD-111 and PD-112 if the council desires to use compound (e.g., bows with pulleys or similar systems) as part of its activities.

3. Will the council authorize "sporting arrows" in the council. If so, the council should assess the budgetary impact and must meet the risk review and SOP requirements in Specific Requirement D and must indicate that a camp will offer the specialty program(s) in the Intent to Operate filed with the National Council (which replaces the prior application procedure).

4. While not required by Standard PS-213, will the council require that bows, arrows, and perhaps other throwing sport equipment used at council operated camps and events be council-owned or leased from a qualified vendor? This decision provides the council with a greater level of

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## Demonstrating Compliance with Standards PS-213/214

assurance that the provided equipment is in good condition and Scout-appropriate. The council's decision should be reflected in the standard operating procedures.

An additional step that a council could take would be to identify the various archery and throwing sports activities that the council will offer at its camp properties and camps. This helps camp participants to choose the camps and activities that interest them.

**Standard PS-214.** There are five major questions that a council must decide about the BB device and firearms programs it will offer. These are:

1. What BB device and firearms will the council authorize for program use at its camp properties and commercial ranges? Standard PS-214 sets forth limitations on the types of firearms that may be used for Scouting America program use but the council can adopt more restrictive policies for ranges at its camp properties and camps.

2. Will the council authorize any of the "specialty programs" in Standard PS-214? If so, the council should consider budget impacts, risk review requirements in Spe-

cific Requirement F, which must be completed before the specialty program is offered, and must indicate that a camp will offer the specialty program(s) in the Intent to Operate filed with the National Council (which replaces the prior application procedure).

3. Will the council authorize BB device use at locations other than commercial facilities and approved camp properties?

4. How will the council demonstrate compliance with the "council ownership" of firearms and ammunition for Scouting America program use at council owned or operated facilities? This requirement can be challenging where local law prohibits corporate ownership. Additional details on this requirement are found later in this NCAP Circular.

5. Will the council allow use of personal firearms and ammunition for program use at commercial ranges? Standard PS-214, Specific Requirement D.6 gives councils a choice in this matter.

An additional step that a council could take would be to identify firearms programs that the council will offer at its camp properties and camps. This helps camp participants to choose the camps and activities that interest them.

### Demonstrating "Council Ownership" of Firearms and Ammunition

A council may demonstrate compliance with the requirement that the council own the firearms and ammunition used in its programs in one of the following ways:

1. Direct council ownership in the council's name.
2. Beneficial ownership, where

legal title of the firearms is in the hand of two or more trustees for the benefit of the council under a trust agreement approved by legal counsel.

3. The council holds firearms under a Federal Firearms License and complies with the terms of its license.

4. The council designates a "nominee" to hold the council's firearms subject to a contractual agreement approved by legal counsel.

5. The council leases all firearms needed for program use when and as needed from a Federal Firearms Licensee who is also a commercial vendor pursuant to a long-term leasing agreement approved by legal counsel.

6. The council obtains a variance from NCAP authorizing an alternative arrangement.

As indicated above, the first step that the council must take is to determine what bows, throwing sports equipment, BB devices and firearms that the council will own or use in its program. The second step is to identify how the council will maintain "ownership" and control over the firearms using one of the six steps listed above. The third step is to determine what persons or groups in the council will be responsible for maintaining the inventory of approved firearms, assuring that only approved firearms and ammunition are procured and provided for program use, checking the firearms and ammunition in and out, and providing for its proper maintenance, as appropriate. The council may, and probably should, consider extending these provisions to the bows, BB devices and throwing sport equipment as well.

### NCAP Circular No. 23

PUBLICATION OF THE  
NATIONAL CAMP ACCREDITATION PROGRAM  
BOY SCOUTS OF AMERICA

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## Demonstrating Compliance with Standards PS-213/214

### Implementing Standards PS-213 and PS-214

Some of the decisions discussed in the prior paragraphs likely should be made by the council's executive board while others are more appropriately delegated to staff and/or a committee consistent with the executive board's action. Here are NCAP's recommendation for a simple procedure to achieve initial compliance with Standards PS-213 and PS-214.

1. The Executive Board discusses and determines which range and target activities it will offer at council properties and at council events and which types of equipment and firearms the council will authorize for its program activities. The Executive Board then selects which of the six "ownership" options the council will use, with NCAP's expectation being that most councils should select #1 when possible. Finally, the Executive Board should authorize an existing committee, a new committee or task force, or an individual responsible for overseeing the range and target activities. The Executive Board could delegate to this committee responsibility for maintaining the inventory, assuring that newly obtained equipment is consistent with the board's direction and Scouting America policy, and drafting and adopting the SOPs for each range and for how the council will handle check in, check out, ammunition supply and related details.

2. The delegated committee then undertakes any reviews required for any Specialty Programs that the council wishes to offer and, if within its delegation, approves the start of the program

or provides a recommendation to the Executive Board if beyond its delegation. The delegated committee adopts the SOPs for how the council will maintain its firearms inventory, firearms procurement and disposition, ammunition supply, firearms check in and check out, and responsibility for maintenance. This committee could also determine which ranges are authorized for which programs and either write the SOPs itself or delegate that to a smaller team, which would develop the SOPs and then have them approved by the delegated committee or executive board as the council sees fit.

3. For each camp property or camp, pursuant to the approved SOPs, the council would issue a check out inventory of firearms and ammunition (and other equipment, at the council's discretion) and the applicable range SOPs to the program leader. The program leader is then responsible for the safe use of the firearms (and other equipment) in accordance with the range SOPs until the firearms and ammunition are checked back in. NCAP recommends that the council's SOPs provide a time within which the check out and check in will occur.

### Demonstration of Compliance

In order to simplify the demonstration of compliance, NCAP is providing, at [www.scouting.org/NCAP](http://www.scouting.org/NCAP) and attached to this NCAP Circular a certificate of compliance that the council may use to demonstrate its compliance with Standard PS-214's council ownership requirement. The certificate reflects the council's decision on which ownership option the coun-

cil has selected and also lists any additional restrictions on range and target activities equipment, devices or firearms that the council has adopted. The NCAP assessment team will then base its determination of compliance based on the certificate, a review of the range SOP for the range(s) in use, and whether the requirements of the standard are met.

NCAP hopes that this Circular assists councils as they plan their range and target activities for the future. If you have any additional questions, please contact NCAP at [NCAP@scouting.org](mailto:NCAP@scouting.org) or National Outdoor Program staff for additional assistance.

### Looking for Guidance and Help with Scouting America Range and Target Activities?

The National Range and Target Activities Subcommittee has released the Scouting America *National Range and Target Activities Manual*, which provides additional explanation of Scouting America policies and procedures for range and target activities, explains the differences between range and target activities conducted at council camps and camp properties and what units may undertake on their own, and provides general guidance on operating a safe, fun, and challenging range and target activities program that will interest in the youth in your councils program. This resource can be downloaded from the range and target activities webpage at:

<https://www.scouting.org/outdoor-programs/range-activities/>

The 2024 *Manual* replaces all prior editions.

## NCAP National and Zone Leadership

NCAP Position	Name	Email Address
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<b>Assessment Chair Vice Chair Lead Zones 1-8 Lead Zones 9-16 Zone 1 Coordinator Zone 3 Coordinator Zone 4 Coordinator Zone 5 Coordinator Zone 6 Coordinator Zone 7 Coordinator Zone 8 Coordinator Zone 9 Coordinator Zone 10 Coordinator Zone 11 Coordinator Zone 12 Coordinator Zone 13 Coordinator Zone 14 Coordinator Zone 15 Coordinator Zone 16 Coordinator</b>	Barry Simays* Randy DeFrank* Brent Worley* Jay Cash* Lee Welch Cap Casperson Chuck Gitzen Rob Richardson Peter Erdelyi Fritz Maxwell Gray Strickland David Ehrlich George Bacalles John Willemain Dave Carlson Jim Korcienski Bobby Bloodworth Jeff Irving Matt Kamat	barry.simays@gmail.com rrdefrank@gmail.com brentw@wallties.com jayhcash@gmail.com leland4811@gmail.com casperc@p@gmail.com cfgitzen@usfamily.net richardsonbrothersdevelopment@gmail.com perdelyi@cromedesign.com fritz.maxwell@sbcglobal.net gray@graystrickland.com dehrlich2@gmail.com gbacalles@gmail.com johnwillemain@comcast.net carlsonbsa@gmail.com jimmyk@ptd.net rbloodworth@reagan.com jeffreyirving@cox.net matthew.kamat@gmail.com

\*National Camp Accreditation Committee

## Future NCAP Developments

**January 20, 2025. Requested date for consideration of changes to the 2026 National Camp Standards.** Please send requests to Eric Hiser at Eric.Hiser@scouting.org with a copy to NCAP@scouting.org.

NCAP is always open to feedback and questions. If you have questions that cannot be answered by your council NCAP chair or zone NCAP coordinator, please email **NCAP@scouting.org** or reach out to a relevant member of the NCAP national leadership team.

*Please always download and use current NCAP forms from [www.scouting.org/NCAP](http://www.scouting.org/NCAP)*



NATIONAL CAMP  
ACCREDITATION PROGRAM

# Certification of Council Control and Ownership of Firearms

**Instructions:** This certificate may be used by a council to demonstrate compliance with Scouting America National Camp Standard PS-214, Specific Requirement C.6, which requires that the council own the firearms and ammunition used for Scouting program purposes. The certificate should be completed annually and is effective for 13 months from the date of signature. The certificate (or a copy thereof) may be used at all camps and camp properties operated by the council to demonstrate compliance during the 13-month period.

**Council name:** \_\_\_\_\_

On \_\_\_\_\_, the council adopted a Resolution authorizing council ownership of firearms pursuant to the NCAP-approved option indicated by an X:

- Direct council ownership in the council's name.
- Beneficial ownership, where legal title of the firearms is in the hand of two or more trustees for the benefit of the council under a trust agreement approved by its legal counsel.
- The council holds firearms under a Federal Firearms License and complies with the terms of its license.
- The council designates a "nominee" to hold the council's firearms subject to a contractual agreement approved by its legal counsel.
- The council leases all firearms needed for program use when and as needed from a Federal Firearms Licensee who is also a commercial vendor pursuant to a long-term leasing agreement approved by its legal counsel.
- The council obtains a variance from NCAP authorizing an alternative arrangement.

The Resolution authorized use of all Scouting America approved firearms with the following additional restrictions (list additional restrictions or write "none"):

\_\_\_\_\_  
\_\_\_\_\_

The council maintains an inventory of firearms that it controls, standard operating procedures to ensure that new firearms and ammunition comply with the Resolution and Scouting America standards, and a check in/check out protocol for both firearms and ammunition.

We certify that the foregoing is true and correct.

\_\_\_\_\_  
President or Board Officer

\_\_\_\_\_  
Scout Executive

Date of Certification: \_\_\_\_\_

**This certification is good for 13 months from the date of signature.**

