

Including People with Disabilities in Parks & Recreation

Winter-Spring Guide 2020

MOBILE PARKS AND RECREATION FOR INTERDEPENDENT PLAYERS

The ADA, Program Access & Customer Service

Presented by
Jennifer Skulski
Skulski Consulting
jennifer@skulskiconsulting.com
www.accessibilitymanagementnews.com

1

Permission for Individual Educational Use

The following presentation is the intellectual property of [Skulski Consulting LLC](#). Permission is granted to the training participant to use the document as a learning aid for professional development. No form of this document may be distributed to other individuals or agencies, reproduced or used by other agencies, businesses, consultants, or competitors; reproduced for presentations, training, or marketing; or any other such activities, without the express written consent of Skulski Consulting LLC.

Disclaimer

The sites or features represented in the following document, in some instances, may not meet the minimum accessibility standards and guidelines under the Americans with Disabilities Act.

© 2024 Skulski Consulting LLC

2

Why are we here?

Where does the individual with a disability fit into the picture of your programs, services and activities?

3

- Phase 1: Accessibility Assessment of Parks & Recreation Facilities
- Phase 2: Comprehensive Review of Policies Practices and Procedures
- Phase 3: ADA Training
- Phase 4: Community Engagement
- Phase 5: Ongoing Technical Support and Facilitated Transition Planning

ADA Evaluation
City of West Lafayette Project Scope

© 2024 Skulski Consulting LLC

4

City of West Lafayette ADA Evaluation

- Part 1: Policy, Practices & Procedures
 - Title II Administrative Requirements
 - Policies & Practices
- Part 2: Accessibility Assessment
- Part 3: ADA Action Plan

City of West Lafayette ADA Evaluation

© 2024 Skulski Consulting LLC

5

ID	Description	Lead Department	Lead Staff	Target	Budget Note	Status Update
The following ADA Action Plan will be monitored and updated by the ADA Coordinator.						
1. Title II Administrative Requirements						
1	Designated Official Required: Formally appoint the Designated Responsible Employee with the final decision-making authority for ADA compliance, and, as a best practice, an ADA Coordinator for daily operations. Distinguish the DRC role from that of the ADA Coordinator.					
	Required: Publicize the contact information for the ADA Coordinator through the web site, all ADA Notices to the public, and other communication vehicles.					
	Formally designate members of an accessibility management team. Support continuing education for the ADA Coordinator and members of the accessibility management team. Support ADA Coordinator to complete the ADA Coordinator Training Certification Program.					
2	Public Notice Update the ADA Notice to follow the DOJ template.					

© 2024 Skulski Consulting LLC

6

Cumberland Park & M. Sinninger Nature Preserve Assessment Date: 8/18/2022
City of West Lafayette Accessibility Assessment Conditions Report

Location	Solution / Description and Recommendation	Priority	Cost Estimate
1 2 3 4 5 6 7 8 9	<p>Playground Modify accessible route to playground/play components. There is no accessible point of entry into the 3 play areas. There is up to a 3 inch change in level from the concrete path into the play surface. Provide an accessible point of entry into each of the 3 play areas. Remove a section of the concrete path and install, preferably, a blended transition with a running slope not to exceed 1% or a curb ramp not to exceed a running slope of 6.25% for playgrounds.</p> <p>Reference: ADA 208.2.2.7 Photo: Cumberland Park 088 Record #: 179 Cost Note: Estimate to install concrete blended transition x 3.</p>	Priority 1 - Critical	\$8,000
	<p>Ball Field Provide accessible route to sports field/ourt. There is no accessible route to the ball field, team seating, or spectator viewing areas. The current path is through grass. Provide an accessible route connecting the site arrival point/accessible parking to the ball field, team seating areas, and spectator viewing areas. (See 700 f)</p> <p>Reference: ADA 208.2.2.4, 402 Photo: Cumberland Park 073 Record #: 181 Cost Note: Estimate for design services.</p>	Priority 1 - Critical	\$4,500

Skulski Consulting LLC Cumberland Park & M. Sinninger Nature Preserve Page 1 of 24

7

61 million adults in the United States live with a disability

26% of adults in the United States have some type of disability (1 in 4)

Percentage of adults with functional disability types

MOBILITY	13.7%	COGNITION	10.8%	INDEPENDENT LIVING	6.8%	HEARING	5.9%	VISION	4.6%	SELF-CARE	3.7%
----------	-------	-----------	-------	--------------------	------	---------	------	--------	------	-----------	------

Source: National Center on Birth Defects and Developmental Disabilities, Centers for Disease Control and Prevention (2018).

8

U.S. Population

People with disabilities have

\$175 billion

in discretionary spending power

Source: U.S. Census Bureau's Americans with Disabilities: 2010 (July 2012).

© 2024 Skulski Consulting LLC

9

ADA Definition of a Disability

- A physical or mental impairment that substantially limits one or more major life activities;
- A record of such an impairment; or
- Regarded as having such an impairment.

© 2024 Skulski Consulting LLC

10

Physical & Mobility Impairments

- Arthritis
- Cerebral palsy
- Spinal cord injury
- Head injury
- Stroke
- Loss of limb/digits
- Parkinson's Disease
- Muscular Dystrophy
- ALS

Functional Limitations

- Ambulation
- Stamina
- Balance
- Reach
- Manual dexterity / fine motor skills

© 2024 Skulski Consulting LLC

11

Visual Impairments

- Glaucoma
- Cataracts
- Macular Degeneration
- Diabetic Retinopathy

Functional Limitations

- Visual acuity
- Visual processing
- Orientation
- Navigation

© 2024 Skulski Consulting LLC

12

Hearing Impairments



- Heredity
- Infections
- Tumors
- Accidents
- Aging

Functional Limitations

- Acuity
- Frequency
- Auditory processing

© 2024 Skulski Consulting LLC 13

13

Cognitive, Learning and Neurological Impairments



- Down Syndrome
- Autism
- Alzheimer's Disease
- Stroke
- Head injury
- Depression
- Anxiety
- Post Traumatic Stress Disorder

Functional Limitations

- Perception
- Conceptualization
- Processing
- Memory
- Problem solving
- Concentration
- Interacting with others
- Responding to change

© 2024 Skulski Consulting LLC 14

14

U.S. History of Disability Discrimination

- Every state had a law prohibiting people with disabilities
 - Employment
 - Segregated Education
 - Voting
 - Travel / Transportation
 - Institutionalization
 - Marriage
 - Sterilization



© 2024 Skulski Consulting LLC 15

15


Attitudes & Behaviors Contributing to Disability Discrimination

- Stereotyping
 - "Blind people have good hearing to make up for their vision."
- Stigmatization
 - "Hanging out with a depressed person is a total drag."
- Psychological discomfort
 - "It's gross that she drools when she talks."
- Paternalization
 - "Those poor people depend on us."
- Pity
 - "It's sad that she will never have a full life being confined to a wheelchair."

© 2024 Skulski Consulting LLC 16

16

Communicating & Interacting with People with Disabilities



© 2024 Skulski Consulting LLC 17


17

People First Language

- Refer to the Person First...

...the disability next, and only when pertinent

- Person who uses a wheelchair
- Person with a visual impairment
- Person with Cerebral Palsy
- Person who is deaf or hard of hearing



© 2024 Skulski Consulting LLC 18

18

Terms to Avoid

- Afflicted
- Confined to
- Invalid
- Retard
- Crippled, lame
- Crazy, nuts
- Suffers from

- Special
- Handicapped
- Has overcome
- Victim of
- Normal person
- Courageous
- Challenged

© 2024 Skulski Consulting LLC 19

19

Trendy Terms

- Physically challenged
- Able disabled
- Handicapped
- Special
- Rarely used by activists & scholars
- Considered well-meaning attempts to inflate value of people with disabilities
- Often viewed as paternalistic


Source: Center on Human Policy; Linton, S. (1998) Claiming Disability: Knowledge & Identity

© 2024 Skulski Consulting LLC 20

20

Interacting with People with Disabilities

- Relax
- Extend the same courtesies that you give to everyone
- Make eye contact
- Speak directly to the person
- Ask before giving assistance
- If you do not understand what someone is saying, ask them to repeat it.
- Stay current on terminology; appropriate terminology shows respect to the person you are communicating with.



© 2024 Skulski Consulting LLC 21

21


Accessibility Management News

CONFESSION: We LOVE a good TED Talk. Even better...we LOVE LOVE LOVE a good TED Talk on disability rights and inclusion of people with disabilities.

So...we thought we would share some of our favorites here:

Our fight for disability rights and why we're not done yet
Judith Heumann | TEDxMidlands

It's incredibly important for people with disabilities and advocates for inclusion to understand the history of the disability rights movement in order to know where we've been and recognize the challenges that still exist. **Judith & Judy Heumann** is a pioneer in the American disability rights movement. There's a page dedicated to her career at [TEDGlobal](#). Here she talks her story about trying to get hearing aides, the impact of the disability rights movement, and the global issue of civil rights for people with disabilities. If there is only one TED Talk on this list that you can watch, THIS IS THE ONE!



Why design should be for everyone
Streed Burke | TED Talk

"I often forget that I am a little person," says Streed Burke. "It's the physical environment and society that remind

Search Posts

Recent Posts

Categories

Accessibility Standards
 Assessments
 Business
 Disability
 Inclusion

<https://skulskiconsulting.com/2019/04/our-favorite-ted-talks-on-disability-accessibility-and-inclusion/>

© 2024 Skulski Consulting LLC 22

22

Person-centered.


Customer Service

...putting the customer first.

© 2024 Skulski Consulting LLC 23

23

Good Customer Service VS Bad Customer Service



© 2024 Skulski Consulting LLC 24

24

Good Customer Service Starts with **Attitude**

© 2024 Skulski Consulting LLC 25

25

Attitudes

- A point of view about a situation
What you think*, do* and feel
- Attitudes toward people with disabilities
- Attitudes toward accessibility

© 2024 Skulski Consulting LLC 26

26

Customer-focused Customer Service

- Patience
- Empathy
- Attentive
- Clear communication
- Knowledge of the program or service
- Positive information
- Responsive
- Flexible
- Empowered



© 2024 Skulski Consulting LLC 27

27

Why do we do what we do?

What experiences do we want our participants to have?

What benefits do we want them to gain?

© 2024 Skulski Consulting LLC 28

28

Recreation 101

Benefits of Parks, Recreation & Tourism

Health Benefits

- Improves quality of life
- Boosts self esteem
- Relieves stress
- Reduces depression
- Enhances personal & spiritual growth
- Contributes to life satisfaction
- Boosts immune system
- Lowers risk of chronic disease
- Reduces obesity
- Increases life expectancy

Social Benefits

- Unites families
- Supports diversity & social bonds
- Develops youth
- Enhances education
- Deters negative behavior
- Reduces crime
- Encourages volunteerism
- Promotes stewardship
- Strengthens communities

© 2024 Skulski Consulting LLC 29

29

The Benefits for People with Disabilities

- Social, emotional, physical and intellectual development
- Understanding of similarities and differences
- Development of positive attitudes toward disability
- Acceptance among non-disabled peers
- Personal growth
- Healthy communities, diverse citizens, respect

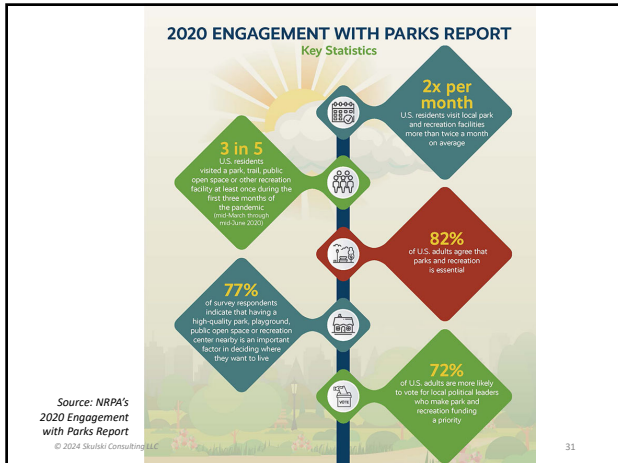
Benefits for People with Disabilities

Everyone



© 2024 Skulski Consulting LLC 30

30



31



32

Barriers to Participation Experienced by People with Disabilities

- Attitudinal
- Communication
- Physical
- Policy
- Programmatic
- Social
- Transportation

© 2024 Skulski Consulting LLC
Source: National Center on Birth Defects and Developmental Disabilities, Centers for Disease Control and Prevention.

33

Americans with Disabilities Act of 1990

- Title I - Employment
- Title II - State & Local Government
- Title III - Public Accommodations
- Title IV - Telecommunications
- Title V - Miscellaneous

© 2024 Skulski Consulting LLC

34

Title II Administrative Requirements

Designate a responsible employee (Entities w/50+ employees)	Notice to the public (All public entities)	Grievance procedure (Entities w/50+ employees)	Self-Evaluation (All public entities)	Transition Plan (Entities w/50+ employees)

© 2024 Skulski Consulting LLC

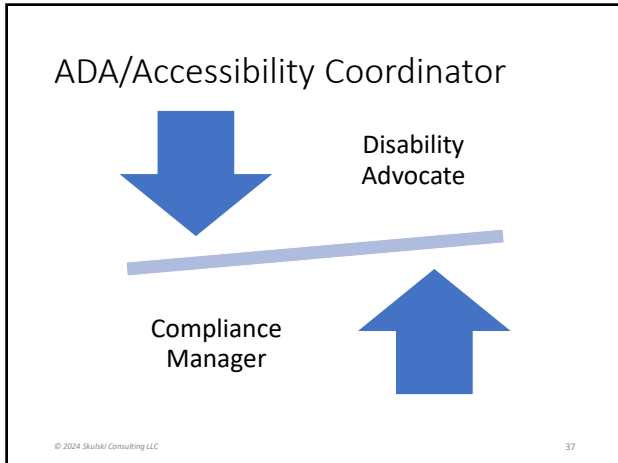
35

1. Responsible Employee

- ADA Coordinator vs CEO
- Purpose ⇄ public liaison
- Decision-making authority
- Role
 - Planning & coordinating compliance activities
 - Overseeing the 5 administrative requirements
 - Receiving & investigating complaints
- Originating department?
 - Human Resources
 - Planning
 - Safety / Risk Management
 - Community Engagement

© 2024 Skulski Consulting LLC

36



37

2. Notice to Public

- Communicated message to applicants, employees, participants, beneficiaries, and other interested parties
- Ongoing communication
- Multiple modes of delivery
 - Newspaper
 - Public service announcements
 - Web site
 - Program brochure
 - Announcements/press releases for meetings, special events
 - Postings at facilities

© 2024 Skulski Consulting LLC 38

38

2. Public Notice

- Intent to comply with the ADA
- ADA Coordinator
 - Name
 - Address
 - Phone
 - (E-mail)

© 2024 Skulski Consulting LLC 39

39

3. Grievance Procedure

- Purpose ⇨ mechanism for resolution
- Existing procedure vs separate for ADA
- Employment process vs Public process
- Procedure
 - Description of procedure to submit grievance
 - 2-step review process that allows for appeal
 - Reasonable time frames for review & resolution
 - Good record-keeping for all complaints and documentation of steps taken toward resolution

© 2024 Skulski Consulting LLC 40

40

4. Self - Evaluation

- Comprehensive review of policies and practices
- The public entity must
 - Identify non-compliance policies and practices
 - Modify policies and practices to bring them into compliance
- Opportunity for people with disabilities and interested parties to review and comment
- On file for public inspection for 3-years (for entities w/50+ employees)
 - List of interested persons consulted
 - Description of areas examined and identified problems
 - Description of modifications

© 2024 Skulski Consulting LLC 41

41

5. Transition Plan

- Where structural changes to existing facilities are necessary to achieve Program Access
- Transition Plan components
 - Identification of physical & communication barriers to programs, goods or services
 - Identification of solution for barrier removal
 - Prioritization and targeted timelines for barrier removal
 - Assigned responsibility
- On file for the public until completed


© 2024 Skulski Consulting LLC 42

42

ADA Title II

§ 35.130 General prohibitions against discrimination

- No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the **services, programs, or activities of a public entity**, or be subjected to discrimination by any public entity.



© 2024 Skulski Consulting LLC 43

43

What **PROGRAMS** do you offer?



© 2024 Skulski Consulting LLC 44

44

Program Access is a foundational principle of Title II



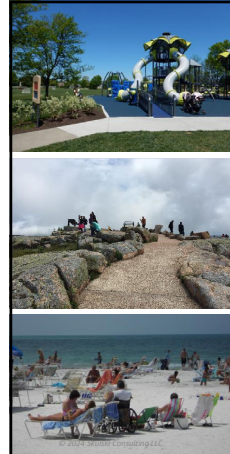
© 2024 Skulski Consulting LLC 45

45

Americans with Disabilities Act

Program Access

§35.149
No qualified individual with a disability shall, because a **public entity's facilities** are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.



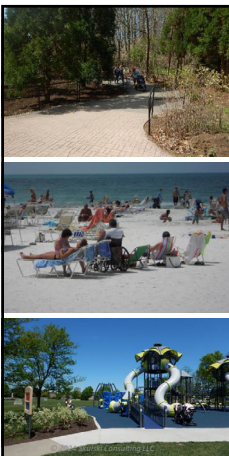
© 2024 Skulski Consulting LLC 46

46

Americans with Disabilities Act

Program Access

§35.150
A public entity shall operate each service, program, or activity so that the service, program, or activity, **when viewed in its entirety**, is **readily accessible to** and **usable by** individuals with disabilities.

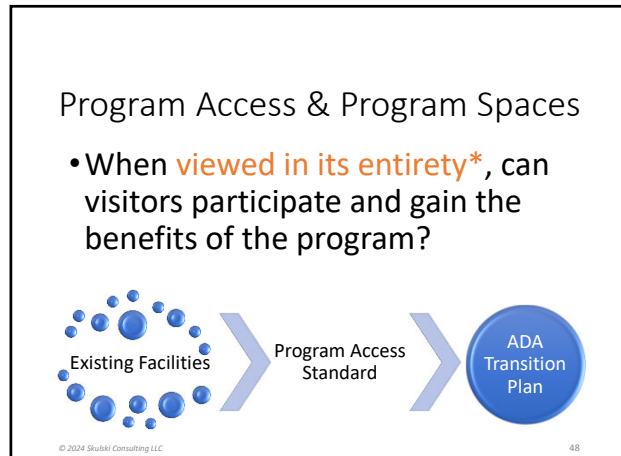


© 2024 Skulski Consulting LLC 47

47

Program Access & Program Spaces

- When **viewed in its entirety***, can visitors participate and gain the benefits of the program?




© 2024 Skulski Consulting LLC 48

48

ADA Title II
Program Access – Key Principles

- Equal opportunity to participate & benefit
- Most integrated setting
 - Least restrictive environment
 - Separate is not equal
- Reasonable modification of policies, practices and procedures
- Eligibility criteria
- Effective communication
- Auxiliary aids and services

© 2024 Skulski Consulting LLC




49

Key Principles of the ADA
Reasonable modifications

- Changes to policies, practices and procedures to ensure people with disabilities can participate and benefit from the program, service or activity
- Required unless the modification would fundamentally alter the nature of its service, program, or activity.

© 2024 Skulski Consulting LLC




50

Key Principles of the ADA
Eligibility Criteria

- Cannot screen out or tend to screen out persons with disabilities...unless it can show that such requirements are necessary

For example, requiring presentation of a driver's license as the sole acceptable means of identification for purposes of paying by check could constitute discrimination against individuals who are blind or have low vision. This would be true if such individuals are ineligible to receive licenses and the use of an alternative means of identification is feasible.
(ADA Questions and Answers, ADA National Network, 2013)

© 2024 Skulski Consulting LLC




51

Key Principles of the ADA
Unnecessary disability-related inquiries

- Cannot ask:
Do you have a disability?
- Can ask:
Do you have a disability-related need?

© 2024 Skulski Consulting LLC



52

Sample
Registration Form

Do you have a disability-related need?

No

Yes, I require _____

- Wheelchair accessible facility
- Sign language interpreter
- Assistive listening system
- Braille or large print
- Additional assistance with instructions or processing information
- Other _____

If you answer yes, a staff will contact you for more information

© 2024 Skulski Consulting LLC



53

Sample 2: Advance Registration Form

I require assistance for a disability related need (check all that apply):

- wheelchair accessible program location
- sign language interpreter
- real-time captioning
- assistive listening system
- audio description / live descriptive services
- braille
- large print
- advance information in electronic format
- other (please explain _____)

If you need alternative communication, please indicate which type:

- Sign Language interpreter
- CART (Real Time Captioning)

If you require materials in alternate formats, please indicate which format:

- Large Print
- Braille
- Electronic

If you use a wheelchair, please indicate which type:

- Manual
- Power

Will you have a service animal with you?

Yes

Do you have special dietary restrictions? If so, please indicate which type:

- No nuts
- Vegetarian
- Vegan
- No Pork
- No Beef
- No Shellfish
- Gluten-Free
- Other

© 2024 Skulski Consulting LLC

54

Registration Form vs Non-Registration Programs

Do you have a disability-related need?

- No
- Yes, I require _____
 - Wheelchair accessible facility
 - Sign language interpreter
 - Assistive listening system
 - Braille or large print
 - Additional assistance with instructions or processing information
 - Other _____

If you answer yes, a staff will contact you for more information

Accessibility information in program/event description

For disability-related accommodations, contact Shelley at (555) 555-5555.

© 2024 Skulski Consulting LLC 55

55

Key Principles of the ADA Surcharges

- The costs for auxiliary aids and services, barrier removal, alternatives to barrier removal or other modifications cannot be passed on to the individual with a disability.




© 2024 Skulski Consulting LLC 56

56

Key Principles of the ADA Effective Communication

- Communication must be as effective for person with a disability as it is for others
 - Nature of the communication
 - Length/duration
 - Complexity
- Primary consideration given to individual with disability




© 2024 Skulski Consulting LLC 57

57

Key Principles of the ADA Auxiliary Aids and Services

- Sign language interpreters
- Readers
- Assistive listening systems
- Audio / video description
- Captioning / real-time captioning
- Alternate Formats
 - Braille
 - Large print
 - Electronic format..... etc

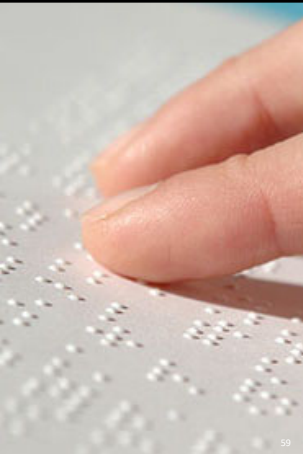


© 2024 Skulski Consulting LLC 58

58

Key Principles of the ADA Alternate Formats

- Braille
- Large print
- Electronic format




© 2024 Skulski Consulting LLC 59

59

Key Principles of the ADA Service Animals

- ADA revised definition: any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability.
- Exception for use of miniature horses




© 2024 Skulski Consulting LLC 60

60

Key Principles of the ADA
Service Animals

- Cannot ask: "What's your disability?"
- Can ask: "Is the animal required because of a disability?" and "What work or task the animal has been trained to perform?"
- Documentation is not required.
- Must be under the handler's control.




© 2024 Skulski Consulting LLC

61

Key Principles of the ADA
Other Power-Driven Mobility Devices (OPMD's)


- Reasonable modification of policy to allow OPMD's
- Assessment factors
 - Type, size, weight & speed of device
 - Volume of pedestrian traffic
 - Facility design & characteristics
 - Legitimate safety requirements
 - Substantial risk of serious harm to the immediate environment or natural or cultural resources
- Inquiry
 - Cannot ask "What's your disability?"
 - Can ask the person "provide a credible assurance that the mobility device is required because of the person's disability."



© 2024 Skulski Consulting LLC

62

Before you say...

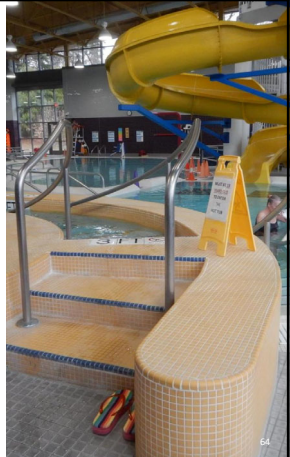


© 2024 Skulski Consulting LLC

63

ADA Defenses

- **Direct threat** to the health or safety of others
 - Individualized assessment; nature; duration; severity of the risk; probability that the potential injury will actually occur; can the reasonable modifications, auxiliary aids or services mitigate the risk?
- **Fundamental alteration** to the nature of the service, program, or activity
- **Undue financial and administrative burden**
 - Public entity has burden of proof
 - Decision made by CEO




© 2024 Skulski Consulting LLC

64

Reality Check: Before You Say "No"

- What is the process to evaluate the request for a reasonable modification of policy or a disability-related auxiliary aid/service?
- Does "NO" include the ADA Coordinator (Designated Responsible Employee) in the determination process?
- Is the rationale for "NO" documented?




© 2024 Skulski Consulting LLC

65

Key Principles of the ADA
Going Above and Beyond

- Public entities are not prohibited from going above and beyond the provisions to better serve people with disabilities.
- Inclusion and Universal Design



© 2024 Skulski Consulting LLC

66



67



68

Visitor Information

- What information can you provide to park visitors and program participants in advance?
- Physical access to facilities
- Auxiliary aids and services
- How to make a disability-related request
- Contact information for additional questions

69

Frontline Staff

- Trained on accessibility features, policies and procedures
- Refreshers for seasonal/full-time staff
- Empowered and flexible to provided quality customer service
- Avoiding the “Knee-jerk No” response

70

Welcome Statement

We welcome the opportunity to serve guests with disabilities to enjoy ALL of our facilities, programs and services. For assistance and information on accessibility, contact Customer Service at (614) 555-5555.

71

City of Eugene Oregon

72

City of San Francisco Mayor's Office on Disability

© 2024 Skulski Consulting LLC 73

City of Milwaukee

© 2024 Skulski Consulting LLC 74

National Park Service

Discrimination on the basis of disability in the Federally conducted programs or activities of the Department of the Interior is prohibited.

For more information or to file a complaint of discrimination please contact:
 800 Program Manager
 U.S. Department of the Interior
 National Park Service
 1666 L Street, NW, Box 3800
 Washington, DC 20540
 website: www.nps.gov/access/

© 2024 Skulski Consulting LLC 74

73

74

Austin Parks and Recreation

INCLUSION UNIT
 The Austin Parks and Recreation Department provides opportunities for all individuals to be included and welcomed to participate, play, and enjoy together. Individuals interested in additional services are encouraged to request modifications to participate in our programs.

TOP CONTENT

- Barton Springs Pool
- Pope & Green Park
- Zilker Metropolitan Park
- Austin Nature & Science Center
- Get it?

© 2024 Skulski Consulting LLC 75

75

Rockford Park District

Welcome Statement

We welcome the opportunity to assist guests with disabilities to enjoy ALL our facilities, programs, and services. For assistance and information on accessibility, contact Customer Service at 815-987-8800 (call or text).

TESTIMONIALS

"We are so grateful for this program; it is the only summer program I can send my son to and have peace of mind knowing the staff can handle my son's issues. The staff did everything they could to make it a successful experience."

"The inclusion staff were great, super enthusiastic, high energy, and great communication."

"My son has a great summer having the ability to participate in golf and tennis. I am truly at ease when he is there because of the level of understanding that the staff have. Thank you so much!"

Inclusion within the Rockford Park District means individuals with disabilities are welcome to participate in the same recreation programs and activities as their peers. Reasonable accommodations are provided to enable an individual's successful participation in a program

© 2024 Skulski Consulting LLC 76

76

Rockford Park District

INCLUSION SERVICES

Inclusion within the Rockford Park District means individuals with disabilities are welcome to participate in the same recreation programs and activities at no additional cost as their peers. Reasonable accommodations are provided to enable an individual's successful participation in a program.

The Rockford Park District requests a minimum of two (2) weeks notice, so necessary supports may be set up.

INCLUSION SUPPORT IS A TEAM EFFORT:

Examples of reasonable accommodations:

- Activity modification
- An increase in staff/participant ratio
- Visual systems
- Sensory items or equipment
- Behavior management supports
- Assistance in the provision of health services which are not inclusive or require medical training
- Sign language interpreter
- Individualized support and care plans

How will I know which Rockford Park District programs offer inclusion support? Look for this icon in the Rockford Park District guide

AVAILABLE

Note: Various levels of support offered based on participants' needs and nature of the program.

Check our website for current eligibility requirements.

© 2024 Skulski Consulting LLC 77

77

Recreation Program Planning


- Staff are prepared to make reasonable modifications of policies, practices and procedures.
- Staff are ready to provide auxiliary aids and services like sign language interpreters, real-time captioning, live audio description and additional staff supports.
- The program is designed to use the accessible locations of the park or recreational facility.
- When inaccessible locations/features are used, staff are prepared to make modifications for equivalent facilitation.

© 2024 Skulski Consulting LLC 78

78

Disability-Related Request In-take Process

- Designated staff to contact participant for follow-up
- Coordination of program support prior to Day 1
 - Service providers & contracts in place
 - Sign language
 - Real time captioning
 - Live audio description
 - Inclusion support staff
 - Equipment
 - Assistive listening system
 - Adaptive equipment
 - Alternate formats




© 2024 Skulski Consulting LLC 79

79

Frequently requested disability-related accommodations in youth programs


- Physical access at the program site, park, or recreation facility
- Sign language interpreter
- Reader, large print, braille, audio information
- Assistive listening system
- Captioning
- Adaptive equipment like trail or aquatic wheelchair
- Adjustment to lesson plan like a modification or adaption of the activity
- Change of environment like a quiet space
- Modification of schedules and social supports
- Behavior supports
- Sensory supports
- Allow for personal care attendant/assistance
- Allow for or assist with medical support
- Additional staff to facilitate activity



© 2024 Skulski Consulting LLC 80

80

Going above and beyond the minimum requirements of the ADA



Americans with Disabilities Act

- Modification of policy, practice or procedure to enable individual to equally participate and enjoy the benefits of the program, service, or activity.
- Provision of auxiliary aid or service to support disability-related need.
- **Specifics on the disability is NOT known by the service provider.**

Therapeutic Recreation

- A systematic process that utilizes recreation and other activity-based interventions to address the assessed needs of individuals with illnesses and/or disabling conditions, as a means to psychological and physical health, recovery and well-being.
- The purpose of the TR process is to improve or maintain physical, cognitive, social, emotional and spiritual functioning in order to facilitate full participation in life.
- **Specifics of disability are made known during the assessment by a Recreation Therapist (RT).**
- Individualized plan is prepared and different for each person.
- Prescribed activity assists individuals in coping with the stress of illness and disability and prepares them for managing their illness and/or disability so they may achieve and maintain optimal levels of independence, productivity, well-being, and quality of life.

Source: *Applied Recreational Therapy*. American Therapeutic Recreation Association (ATRA) <https://www.atra-online.com/page/about-the-therapy>

© 2024 Skulski Consulting LLC 81

81

Inclusion Services is a Team Effort

Parent/Guardian Parent/guardian of an individual with a health/disability related need during registration.	Indicate participant has a health/disability related need during registration.	Complete an Annual Information Form.	Openly communicate with the TR Coordinator. Provide input on needed supports, goals and desires.	Communicate obstacles, feedback on supports, inclusion efforts, and participant experience.
TR Coordinator Coordinator who is responsible for coordinating and developing inclusive supports.	Contact parent/guardian within 48 hours of registration.	Determine appropriate start date and level of support (NOTE: consider program environment, participant assessment, parent goals, and available supports).	Contact parents to share determined start dates and supports.	Communicate info and supports to program and inclusion staff.
Program Director Recreation supervisor who runs and oversees those registered for program.	Provide TR coordinator with program info.	Meet with TR coordinator to learn about participant and supports.	Implement supports.	Communicate with TR coordinator and inclusion staff to help support participant.
Inclusion Staff Staff trained and employed by TR department.	Meet with TR coordinator to learn about participant and supports.	Implement supports as determined by TR coordinator.	Work and communicate with program staff and TR coordinator to support participant.	Consistently and openly communicate with parent/guardian on participant's progress.
Participant 890 participant who needs additional support to successfully participate in program.	Meet program registration requirements (i.e., age, prerequisites, etc.).	Participate on determined start dates.	Follow program/facility rules and code of conduct with determined support.	HAVE FUN!

Source: *Rockford Park District*

© 2024 Skulski Consulting LLC 82

82

Sample Inclusion Questionnaire 1

Therapeutic Recreation Assessment

- Describe child's functional ability
- Describe fine and gross motor skills/limitations
- Describe special medical needs
- May medication schedule conflict with the program schedule?
- Does child have special handling for movement difficulties (positioning, transferring)?
- How does your child communicate (verbally, non-verbally, sign language, communication board)

Type of inclusion support you are seeking (check all that apply):

- Inclusion Facilitator (1:1 ratio) – must contact Inclusion Coordinator at (555) 555-5555, at least 2 weeks prior to program start date.
- Extra support staff (lower staff to child ratio)
- Auxiliary aids or services
- Parent Meeting with Recreation Specialist on site and Inclusion Coordinator
- Behavior Management Plan
- Material Adaptation (Picture schedule, written schedule, picture emotion chart, etc.)
- Other _____

Source: *Minneapolis Park & Recreation Board*

© 2024 Skulski Consulting LLC 83

83

Sample Inclusion Questionnaire 2

Therapeutic Recreation Assessment

- Participant profile, describe:
 - Likes / Interests
 - Dislikes / Triggers
 - Communication
 - Social interacting with peers & adults
 - Physical needs & skills
 - Emotional how copes
 - Sensory
 - Self-Care / Bathroom

Source: *Rockford Park District*

© 2024 Skulski Consulting LLC 84

84

Principles for Adapting Activities in Recreation Programs and Settings

- Adapt only when necessary
- Adapt on an individual basis
- View any adaptations as temporary
- Adapt for congruence/coherence
- Adapt for availability



Principles for Adapting Activities in Recreation Programs and Settings by Tip Ray M.Ed., CTBS

© 2024 Skulski Consulting LLC

85

Inclusion Support Staff

- Aide in the assessment
- Facilitate participation in the program
- Provide structure, details and consistency for the program session
- Provide direction and guidance to stay on task
- Encourage participants to develop friendships
- Emphasize the individual's abilities and similarities while de-emphasizing the differences
- Support behavioral guidelines and safety



© 2024 Skulski Consulting LLC

86


Medication

What medication may be administered by Recreation District Staff?

- Daily oral medication

What about specialized medications that may require personalized training with the parent/guardian?

- Allergy care
- Seizure care
- Medical marijuana patch
- Diabetes care
- Catheterization
- Tracheostomy care
- G-Tube



Policy example:

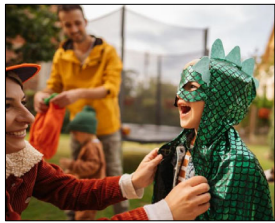
- **What We Do:**
 - Assist with diabetic finger pricks.
 - Carry or allow participant to carry epi-pens or inhalers.
 - Keep emergency medications on site for EMS (glucagon injections, some seizure medications).
- **What We Don't Do:**
 - Insulin injections.
 - Administer medication that requires medical judgment, medical training or is invasive.

© 2024 Skulski Consulting LLC

87

Personal Care & Personal Care Attendants

- Broadly, personal care may include assistance with personal belongings, eating, dressing, grooming, bathing, toileting, and other activities of a personal nature.
- **§ 35.135 Personal devices and services.** This part does not require a public entity to provide to individuals with disabilities personal devices, such as wheelchairs; individually prescribed devices, such as prescription eyeglasses or hearing aids; readers for personal use or study; or services of a personal nature including assistance in eating, toileting, or dressing.
- ADA - modification of policy to allow individual with a disability to participate accompanied by a personal care attendant.



Will staff provide assistance with:

- Feeding
- Dressing
- Toileting
- Medication

Do staff provide assistance for non-disabled participants?

© 2024 Skulski Consulting LLC

88

Behavior

Policy is applicable to all participants.

Example:

All participants are expected to abide by the Behavior Code of Conduct at all times.

- Show respect to all participants, staff and members of the public.
- Refrain from unwanted and/or harmful physical contact.
- Refrain from using abusive, threatening or foul language.
- Show respect to equipment, supplies and facilities.
- Remain within the established program boundaries.



What are the consequences?

Are participants/parents/guardians made aware of policy in advance of program?

© 2024 Skulski Consulting LLC

89

Contracted Programs/Partnerships

- Agreements include ADA responsibilities and expectations, such as:
 - The contractor/partner will comply with the spirit and intent of the Americans with Disabilities Act by conducting programs so that people with disabilities are included in the most integrated setting;
 - The contractor/partner will train staff and volunteers on ADA compliance;
 - The contractor/partner will be responsible for the cost of reasonable modification, including but not limited to extra staff training, extra staff in programs, providing adaptive equipment, changing rules and policies, conducting assessments of registrants, providing sign language interpreters, and other auxiliary aids or services, without passing any surcharges on to individuals with disabilities; and
 - The contractor/partner will comply with the federal 2010 Standards for Accessible Design for all new construction and alterations to existing facilities.




© 2024 Skulski Consulting LLC

90

Program Planning

- Inclusion and accessibility considerations should start with program development.
- How will you meet the needs of people with disabilities?
 - Mobility impairments / Physical impairments
 - Hearing impairments
 - Visual impairments
 - Sensory / Cognitive impairments



© 2024 Skulski Consulting LLC 91

91

Program Planning

Modifications / Auxiliary Aids & Services
What modifications to the procedures or use of auxiliary aids & services have been put into place to meet the needs of people with disabilities?

- People with Physical Disabilities
- People with Visual Impairments
- Other requests that may be received
- People with Hearing Impairments
- People with Cognitive, Learning and Neurological Impairments

© 2024 Skulski Consulting LLC 92

92

Designated Responsible Employee / CEO

ADA Compliance / Accessibility Management Team

- ADA Coordinator**
 - Manage daily ADA compliance
- Engineering / Planning / Design**
 - Prioritize and implement accessibility improvements identified in ADA Transition Plan
- Operations / Public Works**
 - Make ADA improvements through routine maintenance. Ensure daily facility access
- Programs / Services**
 - Provide reasonable modifications, auxiliary aids and services in the most integrated setting.
- Marketing / Communications**
 - Ensure effective communication for all programs, services and activities
- Purchasing**
 - Ensure new products, services and contracts include ADA compliance.
- Information Technology**
 - Ensure new technologies for the public, employees and volunteers are accessible
- Human Resources**
 - Facilitate reasonable accommodations for applicants, employees and volunteers
- Finance**
 - Support creative approaches to steward accessibility improvements
- Risk Management**
 - Assess safety concerns related to ADA compliance
- Legal**
 - Engage proficient resources to support good faith efforts for ADA compliance

© 2024 Skulski Consulting LLC
Source: Skulski, J. (2017) Implementing an Accessibility Management Program 93

93

Accessibility Management Team

- Inclusive with representatives from all departments
- Everyone has an equal voice at the table
- Involvement of Facility Managers, Maintenance/Public Works, Procurement
- Meets at least 2 – 4 times per year to address Transition Plan (re)prioritization and policy issues



© 2024 Skulski Consulting LLC 94

94

Community Engagement

- Listening sessions
- ADA Updates
- Perceptions & needs surveys
- Disability/Accessibility Advisory Committee
 - Role? Functions?
 - Disability awareness or policy directives?
 - Volunteer or appointments?
- Focus groups
 - Input on specific questions
- Task-specific work groups
 - Example: Greenways & Trails, Water Access, Playgrounds




© 2024 Skulski Consulting LLC 95

95

Ongoing Evaluation

- How is this working?
- How can we make this work better?
- Ask visitors and participants with disabilities for feedback
- Seek input from local disability/advocacy organizations



© 2024 Skulski Consulting LLC 96

96

Questions

Jennifer Skulski
Skulski Consulting
(317) 408-4424
jennifer@skulskiconsulting.com
www.accessibilitymanagementnews.com



© 2024 Skulski Consulting LLC

97