



National
Center on
Accessibility

*Best Practices of Accessibility
in Parks and Recreation:
A Delphi Survey of National Experts
in Accessibility*

May 2008

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Department of Recreation, Park, and Tourism Studies
Bloomington

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Introduction

While the Americans with Disabilities Act (ADA) of 1990 has led to greater access to employment, transportation, public services and public accommodations for people with disabilities, some of the esoteric regulations related to program access have been more challenging to apply to public park and recreation settings. For the practitioner, it has not been easy to translate the abstract concept of “program access” into practice. Federal accessibility standards for buildings and facilities exist and continue to evolve with very specific scoping and technical provisions. These standards can be applied to the design and construction of recreation facilities, visitor centers and even outdoor areas for recreation. However, the requirements for “program access” under Title II of the ADA are not as specific. This often leaves park and recreation professionals to their own accord to make programmatic and administrative decisions based on what information is readily available to them at the time. The “program access” standard requires entities to either modify their policies, practices and procedures, or provide auxiliary aids and services to ensure access for people with disabilities. Program access includes access to goods, services, activities or any other offering of a federal, state and local government or business. “Programs” under the program access standard do not necessarily have to be structured or staffed. Programs could range from structured and staffed tennis lessons to an unstructured walk along a nature trail with wayside exhibits. While federal technical assistance materials provide some examples of program access for guidance, the concept of program access is still quite abstract. Moreover, what constitutes accessible “programs” or the “best practice” to ensure persons with disabilities will have equal access to recreation and leisure programs, has

become increasingly more complex and difficult to ascertain, as the demand for inclusive recreation programs continues to grow. Best practices in accessibility, as defined for the purposes of this study, are: *those common, identifiable procedures, attitudes and behaviors, which exceed the minimum standard represented in the practice and delivery of accessible recreation programs and facilities.*

Striving to deliver accessible recreation and leisure programs that exceed minimum accessibility standards is often difficult for professionals to implement. The literature is limited to ADA technical assistance manuals issued by the U.S. Department of Justice with few examples related to recreation. To date, there has been a lack of documentation emphasizing a best practices approach which goes above and beyond the minimum requirements to achieve a greater degree of accessibility that results in full inclusion of people with disabilities. In addition, many recreation and park personnel have little or no background or training in how to accommodate persons with disabilities. Exceeding the minimum accessibility standards for physical access to accommodate the widest spectrum of users and their various abilities is considered universal design. As such, principles of universal design have emerged and provide a foundation for practitioners and educators. An exemplar in universal design may use one or all seven of the principles of universal design. While universal design pushes the envelope of accessible design in the concrete, physical, built environment, it could be hypothesized that best practices guide the more abstract concept of program access for a comprehensive accessibility management system in parks and recreation.

According to the U.S. Census Bureau (2002-2006), there are an estimated 52 million Americans with at least one disability. This means that one in five Americans has a physical or mental impairment that substantially limits him or her in one or more major life activities. For

park and recreation managers and administrators, it is critical that they understand the characteristics, needs and legislative mandates necessary to successfully include and accommodate the 20 percent of the U.S. population that could be disabled and visiting their parks or participating in their recreation programs. Consequently, any failure on the part of the practitioner or administration to provide an accessible environment, or a disability-related accommodation, not only has a negative impact on the individual with a disability, but also impacts the family members and friends who may accompany the individual to the recreational opportunity.

The National Center on Accessibility (NCA) was established at Indiana University in 1992 with the directive to provide training, technical assistance and research on the inclusion of people with disabilities in parks, recreation and tourism. Thousands of professionals throughout the United States and abroad have utilized NCA for assistance with program access issues that arise at their programs and facilities. Over the last five to 10 years, the NCA professional staff has witnessed a dramatic shift in attitudes toward the implementation of the ADA regulations. After the ADA was passed, there was a degree of negative perception amongst practitioners where the regulations were viewed as an unfunded mandate with unrealistic timelines and compliance procedures. Most resistance was embedded in fear and lack of understanding on what accessibility meant (NCA, 2007). According to NCA training course instructors and accessibility specialists, a significant shift in attitudes has emerged where the negative perception is no longer as prevalent and practitioners are more likely to seek best practices not solely because compliance is the law, but because full inclusion of people with disabilities is the right thing to do to promote health and wellness and build strong communities (NCA). More and more, recreation professionals contact NCA already armed with information on the minimum

compliance requirements, but are now seeking information on best practices that exceed the minimum requirements, and are therefore more likely to achieve full inclusion. The need for specific information regarding the best method or that which exceeds the minimum standard has warranted this research study. Currently, no formal document with best practices information exists for practitioners seeking to exceed the minimum compliance requirements set forth under the ADA and other disability-related legislation. As a result of frequent inquiries regarding best practices from practitioners, NCA initiated this research study in order to ascertain which practices in the field of parks and recreation accessibility management exceed the minimum standards set forth by the ADA and other disability-related legislation. The final purpose of the research was to create a document that details “best practices” in the delivery of recreation and leisure service in a variety of settings. The study was coordinated by NCA with support from faculty and staff from the Department of Recreation, Park and Tourism Studies and the Eppley Institute for Parks and Public Lands, at Indiana University-Bloomington.

Methodology

In order to glean information that would reflect those practices in accessibility management that *exceed* the minimum standard, a national panel of experts was assembled. The experts were selected according to their national profile as professionals in the fields of accessibility, disability, and/or recreation services. A total *N* of 26 experts was originally selected to participate in a modified Delphi survey consisting of four rounds of query. Of those that were able to participate in the study, 15 had more than 20 years experience, two had 11-15 years experience, and only one participant had less than 10 years experience. The panel’s expertise ranged from community recreation and therapeutic recreation to legal compliance. Their major

job responsibilities included administrator/director (4), educator/instructor/trainer (4), accessibility/ADA/504 coordinator (3), program manager (3), consultant (2), technical assistance director (1), and engineer (1). The panel also represented various organizations including federal agencies (8), state government (1), local/municipal government (1), not-for-profits (3), private business (1), and university/colleges (4). The panel consisted of individuals from ADA resource centers, enforcement and rulemaking entities, land management bureaus, recreation providers, and disability and/or therapeutic recreation scholars.

A modified Delphi process was selected as the best means of soliciting and analyzing data from the panel of experts. The Delphi process is a method used for creating communication between panel members for the purpose of discussing complex issues, using informed judgment, to ultimately form a consensus regarding the issues (Dalkey, 1969; Linstone & Turoff, 1975). The modified Delphi process extends the main Delphi definition where the group panel is forced to think about the subject in a more complex way (Weaver, 1972). The modified Delphi process allows all the panel experts to reevaluate and refine their responses to certain questions during each round, anonymously, as their time permits.

The panel of experts was asked to volunteer their time as participants in an estimated four rounds of surveys. The total time was estimated at 2 hours (Round 1 taking approximately 30 minutes, and Rounds 2-4 approximately 15 minutes each). Approximately two weeks were allotted between each round, except for the third round, where an extra week was given. The survey was delivered online through a survey tool administered by the Eppley Institute. In this particular study, the question examined was, “What constitutes ‘best practices’ in accessibility in recreation and park environments?” In the first round the participants were asked to agree or disagree to 12 original best practices, proposed by the research team, for accessibility in

recreation and park settings and to provide rationale for their response. (See Appendix A for the original survey questions and original 12 proposed best practice statements.) After the 12 best practices were reviewed, the participants were then asked to identify any additional best practices that they thought should be considered by the group.

In the second and subsequent rounds, the participants were asked to rate the original best practices and those proposed by the participants for which consensus had not been reached. Consensus was defined as an agreement of 80 percent or higher. After consensus was reached the participants were not asked to consider the best practice again.

The total timeline for the modified Delphi process took approximately five months to complete all four rounds of questions. Any best practice statement where consensus was not reached was sent back to the panel, along with all the comments that were provided in the previous round.

Data Analysis

Eighteen of the 26 identified experts participated in Round One of the modified Delphi survey. In order for an 80% consensus to be reached on each best practice item, 14 of the 18 content experts would have to agree on each of the 12 best practices given. According to data results, consensus was reached on all but three of the original 12 best practice did not have an 80% consensus from the panel of content experts. (See Appendix B for Round One data analysis results.)

Round Two of the modified Delphi survey consisted of three of the original best practice items listed previously, from Round One, where consensus was *not* reached, and nine *new* best practice items suggested from the panel. (See Appendix C for Round Two responses). The

number of participating subject panel experts dropped from 18 in the original Round One to a total *N* of 14 participants. The threshold for consensus among the 14 participants, for each best practice item, remained at 80 percent.

The total number of panel experts participating in Round Three was 12. A total of eight best practice items were sent to the subject panel experts for review and discussion. (See Appendix D for Round Three results).

In Round Four, the panel of experts totaled nine participants. The panel did not reach consensus on any of the six items from Round Three. (See Appendix E for Round Four results). Based on the non-consensus items from Round Four, a total of 13 best practices in accessibility evolved from the modified Delphi study. Table 1 shows the final 13 best practices in accessibility based on four rounds of the Delphi process.

Table 1. Best Practice Items Reached through Consensus by Expert Panel

Best Practice Item	Consensus %
1. A best practice in accessibility includes the provision of accessible information to patrons, in alternative formats, recognizing persons with visual, hearing, or cognitive impairments.	89
2. A best practice in accessibility includes practices that exceed the minimum standards/guidelines for accessibility established by the Americans with Disabilities Act Accessibility Guidelines (ADAAG).	94
3. A best practice in accessibility includes an established set of policies which facilitate and promote inclusive and accessible programs, and facilities, in the delivery of recreation and leisure services.	89
4. A best practice in accessibility includes the establishment of an ongoing, periodic training program for agency personnel and volunteers regarding accessible and inclusive concepts and practices for people with disabilities.	89
5. A best practice in accessibility includes the establishment of an Accessibility Advisory Board (or similar group) which includes persons with disabilities.	100
6. A best practice in accessibility includes demonstrated support by administrators regarding accessible recreation programs.	89
7. A best practice in accessibility promotes the delivery of integrated recreation programs and activities for persons with and without disabilities if applicable, feasible, or desirable.	83
8. A best practice in accessibility includes marketing materials and program brochures that are accessibility-oriented for the promotion of inclusion of persons with disabilities.	89
9. A best practice in accessibility includes recruiting staff and volunteers with disabilities to develop and deliver public programs.	93
10. A best practice in accessibility fosters an organizational culture and attitude where recreation staff recognizes and promotes the rights of all persons to access fulfilling and enjoyable recreation activities, regardless of ability or disability.	83
11. A best practice in accessibility includes expenditures related to the purchase of adapted equipment, services, and/or accessibility improvement projects in the financial planning and budgeting process.	100
12. A best practice in accessibility includes public programming that reflects the diversity of communities to include people with disabilities.	92
13. A best practice in accessibility includes a policy to exceed minimum scope of requirements.	83

The modified Delphi process allowed the expert panelists to comment on each proposed item by giving examples of the best practice, as well as rationale for why the item *should* or *should not* be considered a best practice.

1. A best practice in accessibility includes the provision of accessibility information to patrons, in alternative formats, recognizing persons with visual, hearing or cognitive impairments.

This best practice would suggest that traditionally *written* information is available in audio format for persons with visual impairments; traditionally *audio* information is available in written format for people who are deaf or hard of hearing; and that all information is presented in clear and concise formats, including tactile experiences, for persons with a range of cognitive impairments. The expert panelists gave examples of alternative formats such as captioning on audio presentations in the park visitor center; complimentary alternatives to written exhibit information that can also be available in audio format; and providing a tactile relief map of the park that people can touch. The implementation of this best practice would also suggest that information provided in multiple modes or formats can benefit a wider range of people, and not just people with disabilities. Large print could benefit the aging population, as well as young children learning to read, while the same information provided in clear, concise language could benefit people with cognitive disabilities, and individuals learning English as a second language. The provision of the exhibit information through an audio tour would benefit not only people with visual impairments but also those individuals that could become preoccupied such as parents or teachers that are supervising children through the museum.

2. A best practice in accessibility includes practices that exceed the minimum standards/guidelines for accessibility established by the Americans with Disabilities Act Accessibility Guidelines (ADAAG).

One expert panelist gave the example and rationale, “The accessibility standards/guidelines should be exceeded to the extent possible in all design. For instance, whenever possible, entrance ramps should be designed to exceed the minimum 1:12 standard, making it longer, less steep and, subsequently, easier for a greater number of people to use.” Another panelist added, “In a program context, our agency frequently exceeds the minimum Title II requirements by regularly providing one-to-one program aides (which DOJ says isn’t necessarily required). This summer we have hired a nurse of a boy with autism and diabetes. In both situations, our rationale is the same: without the one-to-one aide or nurse that person cannot enjoy the recreation [experience].” A third panelist summarized the rationale for the best practice by stating, “To merely comply with the law means that the total range of individuals with disabling conditions, who would not necessarily identify themselves or be identified as "disabled" by legal definition, are cut out of participation and inclusion. Going beyond compliance means viewing accessibility as an asset to the institution and as basic good customer service. This is the most inclusive approach to accessibility.”

3. A best practice in accessibility includes an established set of policies which facilitate and promote inclusive and accessible programs, and facilities, in the delivery of recreation and leisure services.

Comments from this item suggest that an established set of policies is necessary to serve as guidance for staff, and ultimately, to measure the agency’s success/failure to promote inclusive and accessible programs and facilities. One panelist commented, “Having established policies in place, taught at initial entry into a position, and referred to often affirm the importance of accessibility, directs employees on methods of implementation, and informs the public about

what people have the right to expect.” Another panelist commented that a lack of established policies can lead to confusion among staff and those with accessibility management responsibilities, which in turn can result in bad choices for the agency.

4. A best practice in accessibility includes the establishment of an ongoing, periodic training program for agency personnel and volunteers regarding accessible and inclusive concepts and practices for people with disabilities.

Panelists believed that training was necessary to introduce new information and reinforce relevant information for employees and volunteers. One of the expert panelists tied the importance of this item to the previous item by stating, “It does an agency/institution no good to have accommodations, policies and procedures if those individuals who must implement them are unaware of the existence of the accommodations.”

5. A best practice in accessibility includes the establishment of an Accessibility Advisory Board (or similar group) which includes persons with disabilities.

This proposed best practice was the first of two items to receive 100 percent consensus from the expert panel. The range of comments suggested that the inclusion of people with disabilities in an advisory board capacity could bring personal experiences to the group, new insights that could result in better decisions, credibility and greater support from the community. A panelist suggested, “Having a group that is knowledgeable and has experience in areas of accessibility related to the agency is important when making changes to program structures, adding new programs, entering into joint ventures with other agencies, creating new facilities, updating facilities, purchasing adapted equipment, generating policies and procedures, developing marketing strategies and materials.” Comments from the expert panelists included whether or

not the advisory board should have a broad or narrow focus. However, there were a number of comments suggesting that the advisory board should have a function and purpose, prohibiting it from serving as a “token effort to rubber stamp access decisions that have already been made.”

6. *A best practice in accessibility includes demonstrated support by administrators regarding accessible recreation programs.*

Comments from this item illustrated how support by administrators can affect the organizational philosophy, culture and approach toward accessibility and inclusion of people with disabilities. “If the manager doesn’t fully believe in inclusion, staff won’t either and will do it poorly,” commented one panelist. Another added, “Only when administrators make access policy and require full integration does permanent, dependable access occur.” Several panelists connected demonstrated support by administrators to the financial planning and budgeting processes for inclusion support, retrofits and accessibility improvements. One panelist commented, “The agency budget should reflect support for accessible recreation programs through specific line item funding of accessibility projects.” Panelists alluded to the fact that if there was no support from administrators for accessibility and inclusion, it would not receive the necessary budgetary and staff resources for implementation and, as a result, accessibility would not be viewed as a priority compared to other issues, ultimately leading any accessibility efforts to fail.

7. *A best practice in accessibility promotes the delivery of integrated recreation programs and activities for persons with and without disabilities if applicable, feasible, or desirable.*

Several panelists commented on the importance of providing integrated programming experiences. Said one panelist, “Integrated programming acknowledges that all people have

varied learning styles, different levels of understanding and experience in different subject areas, and usually come to recreation programs with family and friends who are at different levels or may have different disabilities than they do. Integration is both the most educationally sound and cost-effective approach to programming.” Panelists felt that programming emphasis should be placed on making existing programs and experiences accessible to the widest audience possible, without duplicating services or segregating groups of users.

8. A best practice in accessibility includes marketing materials and program brochures that are accessibility-oriented for the promotion of inclusion of persons with disabilities.

Expert panelists felt that if enough detail was provided on the accessibility features of the program or facility, people with disabilities would have adequate information to make a more informed decision regarding their ability to participate in the program or facility. This could be done through the general program/facility brochure, a brochure specific to accessibility features, or even a special accessibility section of the agency/facility web site. For example, a campground brochure might include information on the type of accessible camp sites, location and proximity to the accessible shower facilities. A museum web site might include information on the availability of audio described tours, or sign language interpreters, and contact information on how to request a more specific accommodation for a museum visit. Some panelists also suggested that the use of testimonials and photos of people with disabilities enjoying the program or facility could market a positive message about the agency’s commitment to accessibility and the inclusion of people with disabilities.

9. A best practice in accessibility includes recruiting staff and volunteers with disabilities to develop and deliver public programs.

The expert panelists suggested that the inclusion of staff and volunteers with disabilities is a universal best practice where the agency profile should reflect the profile of the community it serves. They added that qualified individuals with disabilities will be able to contribute to program planning and design based on their personal experiences, while at the same time, they may be able to help others with, and without, disabilities to feel more comfortable participating in the program.

10. A best practice in accessibility fosters an organizational culture and attitude where recreation staff recognizes and promotes the rights of all persons to access fulfilling and enjoyable recreation activities, regardless of ability or disability.

This item concludes that the agency's core values should include a philosophy toward inclusion where everyone in the community, regardless of ability, is encouraged to participate. It also suggests that support of inclusion should be a responsibility of all staff as specified by their job description. Some panelists commented on how fostering a positive culture can be challenging if it is a philosophy that is only practiced by a few people in the organization and when/if there are staff changes, this practice may or may not be carried forward depending upon the new individuals in the positions. This reiterates the need for of philosophy of accessibility to be part of the organizational culture and best practice, and not necessarily just a practice of a few individuals in the agency.

11. A best practice in accessibility includes expenditures related to the purchase of adapted equipment, services, and/or accessibility improvement projects in the financial planning and budgeting process.

This item emerged as a theme in Round One, and when presented as a proposed best practice in Round Two, it was the second of only two items to receive 100 percent consensus. Comments from this item suggests that planning for accessibility is more cost-effective when adapted equipment, services and accessibility improvements are considered as part of the original planning process and not as afterthoughts. Prioritization of funding for specific projects or improvements can ensure that dollars are allocated based on needs.

12. A best practice in accessibility includes public programming that reflects the diversity of communities to include people with disabilities.

While some expert panelists viewed this practice as a “no brainer” that should be common place among practitioners, others saw more global implications. One panelist commented, “A narrow view of best practice would see accessibility isolated from other practices. It is important to see and encourage the interrelated nature of accessibility with events that expand community awareness of its diversity. Fundamentally we are talking about human differences and what communities believe and do in regard to acceptance and inclusion. This potentially impacts local decisions about resource allocation and other policies regarding accessibility.”

13. A best practice in accessibility includes a policy to exceed minimum scope of requirements.

One panelist remarked, “Best practices always exceed minimum requirements. That is what makes them exemplary.” This item evokes comments on the assumed correlation between best practices in accessibility with best practices of Universal Design. Another panelist suggested that policies that support Universal Design go above the minimum standard and this is what entities should strive for.

Eight Non-Consensus Items

There were a total of eight best practice items presented that did not receive consensus by the panel. Two items that did not reach consensus as best practice by the panel of experts focused on the “undue burden” provision in the ADA as a reason for not making programs and/or facilities accessible for persons with disabilities. Specifically, the two items were stated as follows:

- 1. A best practice in accessibility includes the goal that recreation and leisure programs are accessible for persons with disabilities, unless an undue burden is imposed on the agency.***
- 2. A best practice in accessibility includes the goal that the majority of the facility (building) is accessible for persons with disabilities, unless an undue burden is imposed on the agency.***

In both cases, panelists indicated quite strongly that the use of the “undue burden” provision was not appropriate when considering best practice. Panelists reiterated that undue burden is a term used as a legal defense and that it did not constitute best practice, rather only meeting minimum requirements.

It is interesting to note that these two items had over a 50 percent consensus as best practice in Round One, but only 14 percent in Round Two. It is obvious that comments by other panelists had a significant influence, so much so that in Round Two, 86 percent of the responses were negative, thus dropping the items from consideration in subsequent rounds. This indicates that the panelists were influenced by the comments of others within the Delphi process, and that they were open to considering others’ thoughts on a particular issue.

The third item originally proposed by the research team went through all four rounds of the process and did not reach consensus. In fact, the ratings changed very little through the four

rounds, with those favoring, and those opposing the statement as a best practice, was evenly split. The proposed best practice statement read as:

- 3. *A best practice in accessibility includes practices to reasonably accommodate persons with disabilities in recreation and leisure activities through the provision of adaptive equipment and program modifications.***

Those disagreeing with this statement did so largely because of a) they felt it was a minimum requirement and b) they were concerned about the wording in the statement, specifically using the words “reasonably accommodate.” While this statement did not reach consensus it was not so much that the panelists disagreed with the content, but with the wording and because it is a minimum requirement.

Those agreeing with the statement looked at it quite differently, citing examples of specific venues, equipment and services that may not be interpreted as being required by the law, but by doing so, would elevate the provision of these services to best practice. Additionally, those supporting this statement indicated that when agencies provide as many accessible features as possible, beyond the minimum requirements (e.g. Universal Design) they are using best practice.

The following five items were proposed best practices generated by the panel in Round One and presented for consideration in Round Two. The following were items generated by the panel, but did not reach consensus:

- 4. *A best practice in accessibility includes accommodations based on research and program outcomes about the needs of people with disabilities.***

Over half of the experts agreed with this statement, and there was not much change in the three rounds in which it was rated. The item did not reach the 80 percent consensus threshold. Some panelists, once again, got “hung up on” semantics (such as the use of the word

“accommodation”). This was the primary reason the panel did not reach consensus. The word “accommodate” was used in the survey in the generic sense, and was not meant to be confused with how the word is used in the ADA. Unfortunately, it did create issues that influenced the outcome of the study. It is also interesting to note that some of the panelists did not agree with this statement because of the assumption that the research did not include people with disabilities. There was nothing in the statement that would have suggested that. Those agreeing with the statement stated that collecting objective data was important for agencies to continue to strive for best practice. They indicated it was particularly important in shaping policy and making evidence based decisions.

5. A best practice in accessibility includes phasing out adaptations when appropriate.

Almost two-thirds of the panel agreed with this statement on the first two rounds, but those agreeing dropped to under 50 percent in the final round. Those agreeing that this was a best practice statement cited that it was necessary in order for people not to become dependent on adaptations, and that too often adaptations are used when they are unnecessary. On the other hand, those opposing this statement as a best practice, mentioned the permanency of disability, therefore phasing out adaptations is not an option, and that it is a dangerous concept. Again, in this question, it was evident that panelists viewed the statement differently and with different frames of reference. Some chose not to respond to the broad meaning of the statement but only to a narrow interpretation. In this case it is likely that this statement would have reached consensus with some wording changes.

6. A best practice in accessibility includes full survey of facilities, programs, communication plans, and outreach on at least a five year basis.

This item received just under 50 percent favorable vote on the first two rounds and just over 50 percent in favor on the last round. Those supporting the statement indicated that this definitely exceeds the minimum and that it is needed to make best practice adjustments in programs and facilities. Those voting against it as a best practice did not disagree on the need to conduct surveys, and felt that “ongoing surveys were important.” However, there were differences of opinion as to how often surveys were undertaken. The specific time listed was likely the major reason for this item not reaching consensus.

7. A best practice in accessibility includes one person designated to have the authority to provide, modify, and assist staff in provision of services and receive complaints.

This item generated many comments and much disagreement among panelists. Essentially the disagreements revolved around the concept that it is very important to have an identified person who is visible to the public, and who does not have to wade through many administrative layers to get accessibility projects completed. The other perspective was that having one person as the authority was a dated practice, and that it was important to have many people involved in decision-making on accessibility.

8. A best practice in accessibility includes integrating (as appropriate) information about people with disabilities into the content of exhibitions, tours, and public programs.

This item missed receiving a consensus vote from the panel by 1 percent in the first round and 2 percent in the final round. Those disagreeing that this statement was best practice did so because they did not know what “information about people with disabilities” meant or that they did not

understand how including information would make them accessible. On the other hand, the majority of panelists felt that it was a best practice statement because a) including the information about the availability of accessible seating, listening devices, captioning, etc., not only provides assurance to people with disabilities but is a good way for the public to understand that all people are welcomed; and b) the inclusion of information about people with disabilities enhances the inclusion of all people into these programs and venues.

Discussion

Limitations of the Delphi Process

The following list describes several of the challenges that the Research Team at Indiana University readily concedes as limitations of the research study:

1. The Panel of Experts was selected by the Research Team at Indiana University. The panel members needed to have a minimum of five years of experience in the recreation, inclusion and/or accessibility field and a demonstrated understanding of the laws and issues related to access for people with disabilities. The Research Team attempted to identify individuals who all agreed would be considered content experts.
2. The response rate of the panel dropped by 50% from Round 1 to Round 4 and therefore diminished the effectiveness of the Delphi consensus building process.
3. No pilot testing of the instrument/content was undertaken. A review of the responses indicates that a few of the items may have reached consensus had some of the wording been more carefully chosen, i.e., lack of clarity or misuse of terminology.

Summary and Conclusion

A total of 21 possible “best practices in accessibility” were identified by the research team and the panel of experts. Of the twelve statements originally proposed by the research team as best practices, nine were agreed upon by the panel as “best practices.” All nine were accepted as best practices by the panel of experts on the first round of the Delphi process. Of the nine additional statements proposed by panel members, four of these were ultimately determined to be “best practices” by the panel. Two of these four were accepted by a consensus of the panel the first time they had the opportunity to rate them. Two of the four accepted items took two rounds of consensus building to reach the best practice threshold. As stated earlier, the research team had set eighty percent (80%) consensus as the threshold for accepting the statement as a best practice. It is important to note that in most cases, the items that did not reach consensus by the panel, did not reach that threshold for the following reasons, as stated by panelists:

1. The item(s) represented a requirement by law or standard, or that they represented a minimum expectation (core principle of an agency) and therefore should not be identified as best practice.
2. The item(s) were generally agreed to as best practice but were not included because panel members felt that there were one or more “words” in the descriptions (semantics) that needed to be changed or clarified, e.g. accommodations, reasonableness. Some panel members seemed to interpret this question differently than others, based on “wording and not concept.”

3. The two items that included “undue burden” as a reason to not comply with accessibility was generally viewed as an illegitimate reason to not provide accessibility, and using it as a defense was certainly not best practice.
4. The two questions focusing on adaptive equipment/programming drew the biggest as to whether or not it should be included as a best practice. In both cases, each item received less than 50% agreement by the panelists as best practices, primarily for the following reasons:
 - a. Determining when modifying programs/facilities is best practice or creating dependency
 - b. Best practice goes beyond modifications and/or adaptations
 - c. Wording issues with the statements
 - d. Completely phasing our adaptations/modifications is not possible

Value of the Research Approach using the Delphi Process

As a research technique, the Delphi has been successfully used by researchers to reach consensus among experts on issues where the opportunity for face-to-face dialogue may not be practical. In this study, it does appear that sharing expert opinion among panelists did influence decisions on a few of the survey items. It appeared that the most influential aspect of the process was the panelists’ ability to review other responses and to clarify or add to the thoughts of the group. On at least five items, based on ratings and expert comments, other panel comments did appear to influence ratings on subsequent rounds of the study. However, only two items moved over the 80% threshold to qualify them as a best practice. Because the number of experts participating in each round was lower, it is difficult to measure the cumulative effect of expert comments on the other panelists.

Conclusion

This study should be considered the first of many that could explore the concepts and guiding principles for further defining best practices of accessibility in parks and recreation. As practitioners, consumers and researchers review the 13 best practices presented here, it is likely that they will find many that could be considered common practice and intuitive to establishing a successful accessibility management program. It is also important to note that the broad language used to describe the 13 best practices could enable these to be applied to industries outside the fields of recreation, park and tourism administration. Future research is needed to investigate the broad application of the best practices, or narrow benchmarks that could measure outcomes as a result of implementation of one, or several, best practices.

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APPENDIX A

Round 1 - Best Practices Survey

Background and experience

Please answer the following questions to describe your background and experience.

1. The following title best describes my professional position: (Check only one.)

- Administrator/Director
- Accessibility/ADA/504 Coordinator
- Advocate
- Consultant
- Educator/Instructor/Trainer
- Program Manager
- Therapeutic Recreation Specialist
- Other, please describe_____

2. The following category best describes my organization: (Check only one.)

- Federal agency
- State government
- Local/municipal government
- Non-profit
- Private business
- University/college

3. My professional experience is best described as: (Check only one.)

- Less than 5 years in the field
- 6-10 years in the field
- 11-15 years in the field
- 16-20 years in the field
- More than 20 years in the field

I. Best Practices

Yes,
I agree

No,
I disagree

For the purposes of this study, "Best Practices in Accessibility" are defined as those common, identifiable attitudes, behaviors, theories, policies, interventions, and outcomes that represent a set of ideal (desirable) elements in the practice and delivery of accessible recreation programs and facilities, based on the best knowledge available to date.

Please answer the following questions.

4. A best practice in accessibility includes the provision of accessible information to patrons, in alternative formats, recognizing persons with visual, hearing, or cognitive impairments. Yes, I agree No, I disagree

If you agree, please give examples:

5. A best practice in accessibility includes practices that exceed the minimum standard guidelines for accessibility established by the Americans with Disabilities Act Accessibility Guidelines (ADAAG). Yes, I agree No, I disagree

If you agree, please give examples:

6. A best practice in accessibility includes an established set of agency policies which facilitate and promote inclusive and accessible programs, and facilities, in the delivery of recreation and leisure services.

If you agree, please give examples:

7. A best practice in accessibility includes the establishment of an ongoing, periodic training program for all agency personnel and volunteers, regarding accessible and inclusive concepts and practices for people with disabilities.

If you agree, please give examples:

8. A best practice in accessibility includes the establishment of an Advisory Board which includes persons with disabilities.

If you agree, please give examples:

9. A best practice in accessibility includes demonstrated support by administrators regarding accessible recreation programs.

If you agree, please give examples:

10. A best practice in accessibility includes the goal that 100% of programs and activities delivered are integrated programs for persons with and without disabilities if applicable, feasible or desirable.

If you agree, please give examples:

11. A best practice in accessibility includes marketing materials and program brochures that are accessibility-oriented for the promotion of inclusion of persons with disabilities.

If you agree, please give examples:

12. A best practice in accessibility includes the goal that the majority of programs are accessible for persons with disabilities, unless an undue burden is imposed on the agency.

If you agree, please give examples:

13. A best practice in accessibility includes the goal that the majority of the facility (building) is accessible for persons with disabilities, unless an undue burden is imposed on the agency.

If you agree, please give examples:

14. A best practice in accessibility fosters an organizational culture and attitude where recreation staff recognizes and promotes the rights of all persons to access fulfilling and enjoyable recreation activities, regardless of ability or disability.

If you agree, please give examples:

15. A best practice in accessibility includes practices to reasonably accommodate persons with disabilities in recreation and activities through the provision of adaptive equipment and program modifications.

If you agree, please give examples:

16. A best practice in accessibility also includes: (please give examples)

APPENDIX B

Round 1 Data Analysis

Total Number of Respondents: 18

About the Respondents:

1. The following title best describes my professional position:	Respondents	%
Administrator/Director	4	22%
Accessibility/ADA/504 Coordinator	3	17%
Advocate	0	0%
Consultant	2	11%
Educator/Instructor/Trainer	4	22%
Program Manager	3	17%
Therapeutic Recreation Specialist	0	0%
Other, please describe: (Technical Assistance Director, Engineer)	2	11%

2. The following category best describes my organization:	Respondents	%
Federal agency	8	44%
State government	1	6%
Local/municipal government	1	6%
Non-profit	3	17%
Private business	1	6%
University/college	4	22%

3. My professional experience is best described as:	Respondents	%
6-10 years in the field	1	6%
11-15 years in the field	2	11%
16-20 years in the field	0	0%
More than 20 years in the field	15	83%

4. A best practice in accessibility includes the provision of accessible information to patrons, in alternative formats, recognizing persons with visual, hearing, or cognitive impairments.

Yes, I agree	%
16	89%

- Providing captioning on audio presentations in the park visitor center or on tour for people who are deaf or hard of hearing. Providing a tactile relief map of the park that people with visual impairments can feel. Providing an audio tour of a nature trail for individuals who are not only visually impaired but have cognitive disabilities.
- Accessible web information, large print, Brailled,
- Raised print signage for people with visual impairments.
- Our aging population often needs large print materials to make reading easier. The burgeoning use of text messages has also been invaluable as a alternative communication method for people with impaired hearing
- The provision of assistive listening devices and captioning.
- Exhibition labels that are written "reverse pyramid" format: (first line/paragraph) introductory, clear language, in precise sentences presenting key information on the object or exhibit; following paragraphs containing increasingly more detailed information for those who want to read further. Legible label text with label design facilitating easy reading; label within reading distance/height for viewers both seated and standing. Label text also available in audio format, either right at the label location or in a format carried with the viewer.
- Audio tours, tactile maps, interpreted or captioned visual presentations, accessibility included in program policy and procedures, assignment of guides.
- Using symbols of accessibility in promotional, marketing and informational material such as brochures, flyers and websites to indicate what programs and activities are particularly accessible. Website accessibility per W3c WAI guidelines or Section 508 standards.
- All exhibit design must ensure the information is available to and understandable by persons who may have visual, hearing, or cognitive impairments. For

instance, providing written information in audio format for persons with visual impairments; providing audio information in written format for deaf or hard of hearing persons; and providing information in clear, concise formats, including tactile experiences, for persons with the range of cognitive impairments.

- Providing an audio tape for an exhibit area. Not only provides information to persons with visual or cognitive impairments, but also to others who may be preoccupied with other things (I have talked to parents with young children who prepare audio - allows them to watch their children and still receive info.
- Universal design of museum exhibitions where primary information is provided redundantly in alternative ways, e.g., print labels, audio, graphics, tactiles.
- We provide web access, Braille, large print info in audio formats, read and describe when necessary.
- Including language on brochures, fliers or other materials distributed to the public that includes a statement such as "Alternative Formats are available upon request" and if appropriate including a phone # or person to contact.

No, I disagree	%
2	11%

- It's required by law! If an entity is not complying with the ADA if they fail to provide alternative formats of their programs and services.
- I believe it is more than a best practice, I believe it is the law

5. A best practice in accessibility includes practices that exceed the minimum standards/guidelines for accessibility established by the Americans with Disabilities Act Accessibility Guidelines (ADAAG).

Yes, I agree	%
17	94%

- Providing a brochure on site which provides information about the slope, cross slope, surface, etc. of trails.
- Making sure the CONNECTIONS between accessible spaces adhere to standards as well.
- Program that is cooperative, and not competitive, in nature
- In a program context, our agency frequently exceeds the minimum title II requirements by regularly providing one-to-one program aides (which DoJ says isn't necessarily required) and this summer we have hired a nurse for one boy with autism and diabetes. In both situations our rationale is the same...without the 1 to 1 or the nurse, that person cannot enjoy recreation.
- The provision of automatic door openers.
- While the ADA's Standards for Accessible Design (the enforceable standards drawn from the ADAAG) give general standards for paths of travel and turning spaces, the Standards are not specific enough to address issues of trying to navigate a crowded visitors' center to see exhibition labels, pick up books in the shop, or maneuver in and out of the theater. Parks and recreation areas must consider the ADA Standards in the context of their knowledge of crowds, viewing requirements, viewing heights, and consider providing much larger spaces than the ADA requires.
- ADAAG requires an ambulatory accessible stall when 6 or more stalls are constructed or altered, however we recommend this type of staff even when fewer than 6 stalls are constructed and altered. Including single user/family restrooms so that water is available with toilet and there's room for human assistance (of either gender) and assistive device. ADAAG does not include guideline for access to and on beaches and many other outdoor recreation areas. Best practices are critical for those areas.
- The accessibility standards/guidelines should be exceeded to the extent possible in all design. For instance, whenever possible, entrance ramps should be designed to exceed the minimum 1:12 standard, making it longer, less steep and, subsequently, easier for a greater number of people to use.

- To merely comply with the law means that the total range of individuals with disabling conditions, who would not necessarily identify themselves or be identified as "disabled" by legal definition, are cut out of participation and inclusion. Going beyond compliance means viewing accessibility as an asset to the institution and as basic good customer service. This is the most inclusive approach to accessibility.
- Exceed YES, MEET NO! (This is a confusing question since you mix standards and guidelines (which are different) and they are not "established by ADAAG".
- Make all walkways 60 inches wide. Not only allows comfortable walking room for everyone, include parents with strollers, but allows owner to "cheat" on maintenance - bushes growing next to walkway do not have to be trimmed as often since a 36-inch path should always be available
- Many times the minimum requirements need to be exceeded to provide persons with disabilities independent access.
- Extra accessible parking, more than one accessible restroom stall, having adapted recreation equipment available for use or rent, such as water skis, monoskis, hand cycles.
- Providing companion care/family restrooms in addition to standard accessible restrooms.
- A better ramp would be one closer to level, thus exceeding 1 in 12.
- The minimum standard for a ramp under the ADA is 1/12. Architects and designers tend to design to the minimum which does not take into account the spectrum of users. A 1/12 ramp is still difficult to do for many people with disabilities. A ramp that is 1/15 -1/20 would be more useable to a wider variety of individuals needs. Not designing to the minimums or maximums rather looking at spectrum of user and choosing options that will serve greatest # of people optimum.

No, I disagree	%
1	6%

- Exceeding the minimum standards in many cases is exceedingly helpful, but too many people are falling short of even meeting the standards, so I think that a "best practice" at this point in time would include meeting the standards.

6. A best practice in accessibility includes an established set of policies which facilitate and promote inclusive and accessible programs, and facilities, in the delivery of recreation and leisure services.

Yes, I agree	%
16	89%

- Establishing a policy for the provision of auxiliary aids, when requested, to access programs and services.
- Inclusive to the greatest extent possible, given the person's abilities and limitations. People are more than just the disability; services are individualized to the fullest extent possible.
- All facilities will be architecturally accessible
- Our inclusion policy covers everything from how requests for support are made to how we provide the support to how we fund the support.
- The provision of a notification policy to include information related to signage, requesting sign language interpreters, where to file a complaint, etc.
- Human error is a common problem for organizations, especially those with seasonal employees, volunteers, and high staff turnover. Having established policies in place, taught at initial entry into a position, and referred to often affirms the importance of accessibility, directs employees on methods of implementation, and informs the public about what people have the right to expect. Ticketing policies -- addressing issues ranging from whether people with mobility impairments have to stand in long lines for tickets, to if there is a provision for reduced ticket prices, or to who can use accessible seating -- all benefit by clearly delineated rules and line of authority for answering questions.
- At this point probably an established set of policies would be helpful. For some organization including and developing accessible programs and facilities is or will be second nature and policies won't be needed.
- Policy which incorporates Universal Design in all aspects of planning. For instance, policy which directs that all (not just a percentage) outdoor elements (e.g., picnic tables, fire grills, vault toilets, etc.) are designed to be accessible to people with disabilities.
- Policy choices infuse all decisions and practices of an institution. Without an inclusive policy or a welcoming policy or a simple statement of policy there is no

measure or guidance on which to base future procedural decisions. This leads to confusion amongst staff and those who need to implement accessibility measures which in turn leads to bad choices.

- Have policy that only accessible picnic tables will be purchased or start with a goal that all campsites will be accessible and back off only when not feasible.
- Policy should specifically indicate how staff are to respond to questions regarding the availability of programs/services to persons with disabilities. The response should be one that specifically indicates how they are accessible, and if not, what the reasonable alternatives are.
- The Smithsonian Institution accessibility policy.
- Programs that are built around the possible inclusion of all different types of disabilities. Providing interpreter if needed, defining the type of agility needed to become involved in an activity so those with limitations can self select a hike that is on a paved trail to allow those with mobility challenges to participate and stated as a paved trail.
- Practices within a program that would support people who have additional needs (i.e. assistance to get in/out of pool and/or assistance with clothing management, communication issues, etc.) to participate within the regular programming versus referring these individuals to "specialized" programming strictly because they have a disability. This would include notifying participants of the availability of accommodations/modifications and training staff to respond appropriately when requested.

No, I disagree	%
2	11%

- This sounds like program or service delivery...not necessarily best practice. The policies themselves may include some "best practices".
- If the practice is not written down or communicated to staff, policies are not incorporated into the day to day activities of the facility. I think this is a current requirement and not necessarily a best practice.

7. A best practice in accessibility includes the establishment of an ongoing, periodic training program for agency personnel and volunteers regarding accessible and inclusive concepts and practices for people with disabilities.

Yes, I agree	%
16	89%

- Training park staff on the use of beach chairs to provide access into the water for wheelchair users.
- MUST be ongoing, must be hands-on, should include people with disabilities as trainers
- All summer camp staff will be oriented on inclusive service delivery prior to the beginning of camp
- The provision of annual training for seasonal staff, who provide direct information or services to visitors and other participants (i.e. camp counsels, visitor information desk staff)
- Ongoing training is essential to maintaining accessible programs and facilities. Facilities staff get caught up in the day-to-day maintenance of a visitors' center and forget to relocate stanchions to maintain a 3' wide path of travel; interpreters handle large summer crowds and forget to face the older adults with hearing loss when talking; and new techniques in the evolving practice of providing audio description need to be introduced. Employees and volunteers need to be introduced, reinforced, and reintroduced to information to keep access skills fresh and in the forefront of their minds, especially if the employees are not reinforcing the practices themselves with daily use.
- In order to cover employee and volunteer turnover, as well as keeping current staff trained in the latest accessibility features available to existing as well as future programs.
- See response to previous question. At this point in our society training is probably needed. However, I've been encouraged by the different reaction from participants for training I did 15 years ago to training I've done more recently. Recent participants have more of an "of course" attitude when discussing the inclusion of people with disabilities.

- Agency policy should require training programs/sessions for current and new personnel and volunteers to include sections on accessibility, attitudinal barriers to people with disabilities, universal design, and accessibility guidelines and standards.
- It does an agency/institution no good to have accommodations, policies and procedures if those individuals who must implement them are unaware of the existence of the accommodations. Staff and volunteers are the conduit and public face of the agency/institution and if they don't know what accommodations are available, how to access the accommodations, then the opportunities for mistakes are rife in communicating the institutions policies and processes to the public.
- The frequency of how often you provide this may be the "best practice".
- Have been at visitor centers where the staff either did not know how to operate captioned videos or did not know where assistive listening devices were located (even though they knew that they were available) - periodic training would help to avoid these issues
- This type of training could only target accessibility for people with disabilities, or the topic of accessibility and otherwise meeting the needs of persons with disabilities could be infused into all training topics as appropriate. Topics would include teaching recreation or sport skills, use of fitness equipment, interacting with patrons, emergency procedures.
- At the Smithsonian, the Accessibility Program provides training for staff on accessibility and disability issues. Training sessions are developed for and delivered to new Security Officers, museum docents, information desk specialists, exhibition designers, architects and engineers, educators, human resource staff, etc.
- Regardless of the [proficiency of the staff, training is essential. The standards for access and inclusion evolve and training on the latest way to include is essential. New materials for trails, etc.
- Incorporating disability awareness into all orientation materials for staff and holding a session at least once yearly for all existing staff to review various policies/practices. This should include sharing best practices that have been used by employees who have worked with program participants with disabilities to share strategies and experiences. This decreases fear of the unknown.

No, I disagree	%
2	11%

- I believe that this is a current requirement to make programs inclusive and accessible.
- It is hard to argue against training, but here I respond only to the notion of ongoing and periodic training. We certainly deliver and receive a lot of training, but I wouldn't view it as a schedule.

8. A best practice in accessibility includes the establishment of an Accessibility Advisory Board (or similar group) which includes persons with disabilities.

Yes, I agree	%
18	100%

- City and County of Honolulu Advisory Committee on Beach access helped to determine the location of beach access chairs.
- This is imperative for the initiative to have credibility and relevance. People with a variety of disabilities should be included.
- Inclusive recreation advisory board at the Jewish Community Center of St Paul that includes family members that have children with disabilities
- We use a Program Advisory Committee for advice regarding programs. For a city system or general purpose parks and recreation agency, an advisory board specifically formed to address physical access would be a good idea.
- The City of Dunedin, FL has an Accessibility Advisory Committee.
- Whether met with as a group on a regular basis or used to consult on a project-by-project basis, advisors with knowledge about and personal experience with the kinds of barriers that people with different disabilities face in parks are essential. Advisors lend credibility to recommendations made by staff to directors and curators (e.g., including appropriate information on people with disabilities in exhibition content), provide new insights to solving difficult problems in exhibitions and programming (e.g., how to provide access to people who are blind or have low vision in a photography exhibition), help spread the word about the parks' programs and access efforts, and provide support and knowledge when a complaint comes to the parks.
- Advisory Boards/committees work well if they include people with various disabilities to bring in multiple perspectives on access that others may not have considered. People with disabilities are more qualified than anyone to come up with valuable input and solutions for inclusive recreation opportunities.
- Depends on the organization. Again the more ingrained inclusion is the less need for an accessibility advisory board.
- Agency policy should require the establishment of a local committee (feds can't call it an Advisory Board) by field offices to consult with the agency on local design and planning issues. The committee must include persons with disabilities or their representatives to insure inclusive planning.
- I agree, but only to the extent that the idea of an "advisory board" be quite broadly defined. The old idea of a standing committee that meets quarterly or

yearly is useless in addressing the immediate needs and concerns that need to be addressed on a daily basis. In addition, merely having an "advisory board" is not the same as taking their advice. If having an "advisory board" is a token effort to rubber stamp access decision already made, or if the advisory boards advice is treated dismissively and/or never integrated into the broader agenda/mission/purpose/goals, and/or never presented or considered by the highest level of management then it is a waste of time, energy and staff resources. IF - a board or task force, is used to develop and build actual policy adopted by an agency/institution and/or if they are available for consultation to deal with daily issues to provide technical consultations, etc. then these groups, definitely inclusive of people with disabilities in a meaningful and significant way are absolutely essential to successful best practices in accessibility.

- This is the first thing that sounds like a "best practice". It's not required by law, but could enhance and improve service delivery. I think entities could benefit from suggestions on the make-up of such a Board. Too often, entities expect an advisory board like this to tell them what to do and provide direction on specific accessibility standards. This works if the person or persons are knowledgeable. If not, they might suggest that a certain design be used that meets "their" needs and make the entity vulnerable with respect to compliance.
- This board would not only be able to address issue, but allow promote awareness. Inclusion of persons with disabilities on this board would allow the board to address issues with real life answers instead of textbook answers
- Having an advisory board can help an organization make sure that they are incorporating policies that do not restrict access and review facilities for compliance.
- Having a group that is knowledgeable and has experience in areas of accessibility related to the agency is important when making changes to program structures, adding new programs, entering into joint ventures with other agencies, creating new facilities, updating facilities, purchasing adapted equipment, generating policies and procedures, developing marketing strategies and materials.
- I agree but an Advisory Board can be a network of people one contacts as s need arises rather than a group that meets on a regular basis.
- Having a blind person on an advisory board will highlight the need for better audio communication, transportation to recreation facilities.
- City/County such as Joliet, IL establishes a committee comprised of individuals with disabilities who are users of their programs and facilities to provide guidance on the need for new programming, policies that support inclusion of people with disabilities etc. and input on barriers that exist in current facilities and programming. These individuals serve as "content experts" on issues associated with providing accommodations, incorporating accessibility into new

construction or alterations and when making decisions of budgetary nature that may affect services (prioritization) when needed. This should not be token only. There should be real buy-in from the entity leadership and a meaningful role should be established for this group.

9. A best practice in accessibility includes demonstrated support by administrators regarding accessible recreation programs.

Yes, I agree	%
16	89%

- State of Hawaii Department of Land and Natural Resources' policy for persons with disabilities who are hunters to be able to shoot from a truck instead of walking, to the extent that vehicles will not damage the environment and are on an established route other permitted for maintenance vehicles.
- Sometimes this is money; sometimes this is practice by example. If the manager doesn't fully believe in inclusion, staff won't either and will do it poorly. Inclusion should be based on needs, rather than mandates or quotas. How managers implement policy indicate their overall philosophy, which then other staff will adopt.
- An agency administrator that hires general programmers with skills and interest in serving people with disabilities
- Line staff follow the lead of administrative staff and supervisors. When admin not only professes the value of access and inclusion but leads the discussion and actively supports it him or herself.
- The provision of a policy providing increased staff ratio for afterschool programs, which include individuals with disabilities.
- While much can be accomplished by grass roots accessibility efforts, they are often hit-or-miss, depending on individual staff, and often disappear when the initiating staff member leaves. Only when administrators make access policy and require its full integration does permanent, dependable access occur.
- The administrators must demonstrate support for accessible recreation programs in order to get buy-in from the staff as well as consumers with and without disabilities, and to include the accessibility as part of the mainstream program - not a special program.
- Always best to have support from the very top.
- The agency budget should reflect support for accessible recreation programs through specific line item funding of accessibility projects.
- Yes. No support, no money, no staff resources, no weight given to choose access over other issues. Without support and concrete commitments from upper level management access efforts are doomed to failure.

- Providing funds specifically earmarked for accessibility retrofits
- Administrators could demonstrate support by being part of a marketing campaign that emphasizes a commitment to accessibility, or they could visit local disability organizations and communicate their support.
- One example might be an administrator inviting advisors with disabilities to participate on an Advisory Board and the administrator attending some or all of the Board meetings.
- Without administration support the ongoing of provision of financial support, as well as the culture of access within the program will not be supported
- City of Chicago hired a Disability Policy specialist in the park district for the 1st time and this position is located within the administrative offices and reports directly to the administrator. This gives a direct line of reporting and accountability to the issues affecting program participants with disabilities within the administrative offices versus within a "specialized" program only that has layers of administrative above it.

No, I disagree	%
2	11%

- I believe that this is needed to make sure that programs and facilities are accessible and useable by all.
- This is should be part of an administrator's job! A best practice might be how to work with administrators to gain support.

10. A best practice in accessibility promotes the delivery of integrated recreation programs and activities for persons with and without disabilities if applicable, feasible, or desirable.

Yes, I agree	%
15	83%

- County of Hawaii adapted recreation specialist promotes inclusion in regular programs.
- Again, service based on larger need, not by disability per se, but by individual, whenever and wherever possible.
- Series of recreation programs at Jewish Community Center of St Paul that regularly includes participants with disabilities
- Invitations in brochures and mission language must stress the availability to all of recreation programs.
- The provision of an accessible facility for all recreational classes.
- The days of "we don't do the blind programs this week," have to be long gone. Segregated programming is more expensive to develop, gets less use, separates families at the door (e.g., dad is deaf so he gets a tour separate from the rest of the family), and requires more staff-intensive work (development, training, and scheduling). Most importantly, integrated programming acknowledges that all people -- have varied learning styles, different levels of understanding and experience in different subject areas, and usually come to recreation programs with family and friends who are at different levels or may have different disabilities than they do. Integration is both the most educationally sound and cost-effective approach to programming.
- Life is rarely either agree or disagree. The survey is forcing answers - what about a range from strongly agree to strongly disagree? Generally integrated programs are best however I've seen instances where people with disabilities have requested separate programs, for example a time slot in the pool/shower/locker rooms that's just for women with disabilities. A hike and nature interpretation that's for people who are blind.
- An agency should have policy not to duplicate programs for the sake of accessibility. Emphasis should be on making programs and experiences available to the widest possible audience without creating separate, duplicative programs.
- However, there is definite value to programs that focus on or are provided to select groups defined by their disabilities. For example: Tours. Integrating individuals with disabilities into general tours open to the public is essential since

most individuals with disabilities visiting a museum; recreation program, etc. do so with their non-disabled companions, family, friends, etc. The social aspects of recreation can't be ignored and thus the disabled individual wants, like everyone else, to do things with their friends. At the same time, this may mean that they won't get quite the in depth or intense experience they might be able to access in a targeted crafted tour such as a "touch tour". Another example might be a sports program - individuals with intellectual disabilities or certain kinds of physical disabilities may feel shut out of an integrated sports program if they can't be competitive, they also may loose out on the value of having peers around. The key, of course, is to giving people the choice to participate in the type of programming in which they are going to be the most comfortable and get the maximum benefit. This is a choice best made by the individual and it may vary depending on the type of activity/recreation being experienced.

- If all picnic areas are accessible, allows all users of recreational programs to use whichever picnic area they want to
- Provide programs that offer participants with disabilities the option of being included with all other registrants, such as with and exercise or fitness program.
- Designing an accessible playground where kids with and without disabilities can play together.

No, I disagree	%
3	17%

- I believe that this is a current requirement, not a best practice.
- This should be one of the core principles of an agency.
- There are a lot of "ifs" in your question. The best practice is always applicable and desirable. If certain aspects of accessibility are not feasible, then it should be the responsibility of the program to find a delivery that provides the consumer with an experience as inclusive and integrated as is feasible.

11. A best practice in accessibility includes marketing materials and program brochures that are accessibility-oriented for the promotion of inclusion of persons with disabilities.

Yes, I agree	%
16	89%

- No example
- Absolutely essential. Must be truthful, must be informational. Provide as much information as possible and let ME decide whether to enter the program/facility. For example, hotels are FINALLY having 'accessible rooms' as an option to choose when making reservations - that is new THIS YEAR (no kidding!); pictures of the4 accessible features would be better as I often don't trust their judgment of "accessible."
- Marketing materials (brochures, for example) that contain photos of people with and without disabilities playing together
- A separate piece regarding accessibility is a great idea and calls attention to the fact that your agency believes it is a priority.
- The provision of a statement as to the contact to receive reasonable modifications necessary to participate in a program.
- With the burgeoning baby boomer population, using larger, legible type; high-contrast color combinations; glare-free paper; and larger, sharp images helps any marketing and program materials reach and serve millions more in the audience.
- Yes see response to previous question about using symbols of accessibility.
- There are two issues here: Program information, materials, and brochures should be created in alternative formats, i.e., large print, Braille, CD. In addition, program brochures, site materials, and websites should include information on the accessibility of programs featured.
- Inclusion of accessibility information in general marketing materials is essential. But there is rarely enough space/money to include the depth of detail that many individuals with disabilities want to know before taking the risk to go some place or participate in some activity they never done before. Information up front prevents unpleasant surprises later. For example: a general brochure may say "Accessible Campsites are available, for more information call" An accessibility oriented brochure will go into details about whether or not their is an accessible platform; is camping on dirt or other surface; how far are restrooms, showers and other facilities, and to what degree are those accessible; can one drive directly up to a campsite or must they park and walk in, etc.

- All marketing materials should be available in alternate formats and websites should be accessible
- Include pictures of participants with disabilities, include statements by participants with disabilities, and indicate your staff willingness and competence at including participants with disabilities.
- A general museum brochure that includes information on the accessibility of the facility and programs, with contact information to request services or ask questions. The brochure should state that alternate formats of the publication are available and the alternate formats should be in stock at the museum information desks.
- Having a TTY number on a document doesn't just say we promote inclusion but demonstrates it
- Including pictures/photos of program participants including individuals with disabilities that would put forth the message that people with disabilities are a part of the programming available. Including language on brochures/flyers that identify any disability related issues (i.e. accessible entrances, parking, etc.) as well as proactive statement that accommodations are available upon request with information on how to request it. Including information on websites, etc. that allow individuals to check out the accessibility features that may be of most interest/greatest need for them (i.e. physical accessibility, etc.) of a facility in advance. This information benefits not only people who have a disability but those planning activities that may include people with disabilities, individuals who may need accessibility features but don't necessarily have a defined disability (elderly, mothers with kids in strollers, etc.)

No, I disagree	%
2	11%

- I believe that this is a current requirement, not a best practice.
- This should be one of the core principles of an agency.

12. A best practice in accessibility includes the goal that recreation and leisure programs are accessible for persons with disabilities, unless an undue burden is imposed on the agency.

Yes, I agree	%
11	61%

- People are people first.
- Appropriate marketing, needs assessment, preparing nondisabled peers, cooperative programs
- ? Totally agree! Actually this is a minimum requirement so perhaps it isn't a best practice.
- The provision of a policy statement that an entity will provide access in conformance with various Federal and State requirements including a reasonable modification to ensure an equal opportunity to receive the benefits of the program.
- Budgeting is probably the best way to achieve this goal. Also targeted fundraising. For example to request funds for sign language interpreters for a program and provide credit for the fund givers.
- (If accessibility is included in the initial planning and design, few efforts to make programs accessible would result in an undue burden to the agency.)
 1. Persons with disabilities should be consulted in the planning and design of programs.
 2. When looking at existing programs, efforts to make them accessible should start at the highest level of access, with alternative solutions considered if enough resources are not available for full accessibility or there is an undue burden on the agency.
- I support the notion of undue burden when talking about pre-ADA programs and facilities, and when the financial burden would be high for a small operation that provides highly specialized programs. Even then the bar should be set high to for allowing an undue burden reason for noncompliance. New programs should have a more difficult burden of proof, and only then after they consult with accessibility experts in their field.
- All citizens have the right to recreate. Full inclusion is the only way to ensure that each citizen has the opportunity to interact with those that may be different then themselves.
-

- Undue Burden should be narrowly defined by most entities. Public entities have a very high burden to provide accessible programs/services and a very narrow exception would ever be at play. Seventeen years after the implementation of the ADA it is very difficult to support any claim of undue burden (financial). There may still be issues that would create a fundamental alternation in the program and service but even those are rare anymore, especially if creativity is incorporated into addressing a potential barrier.

Specific steps: Identify any barriers that currently exist to accessible programming and define "why" something may be an undue burden.

Identify what options are available for providing the program/activity that would eliminate or significantly reduce the barrier

Solicit feedback from participants in areas where an undue burden may be perceived by staff/administration to determine if this is an area of priority for the participants and involve them in the problem-solving and solution process

Budget appropriately or seek additional funds for the removal of whatever barriers exist that constitute an undue burden (if applicable)

Establish a system for reviewing situations that may be claimed as "undue burden" so that an objective process is undertaken when determining if something is an undue burden. Provide an additional "objective" review of the situation before final determination is made.

No, I disagree	%
7	39%

- I don't think a best practice goal should include undue burden considerations.
- I believe that this is a current requirement, not a best practice.
- Obviously a goal that recreation and leisure programs are accessible is a best practice. However I have issues with the "unless an undue burden is imposed on the agency". Too often agencies use this excuse to avoid making programs accessible. Undue burden needs to be an extreme case that requires detailed justification. If there is an undue burden, an alternative should be developed to still meet the goal.
- Same as above...this is required! If the public entity can demonstrate that the modifications would fundamentally alter the nature of its service, program, or activity, it is not required to make the modification. The determination that undue burdens would result must be based on all resources available for use in the program. If an action would result in such an alteration or such burdens, the public entity must take any other action that would not result in such an

alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity.

- No, this is a legal defense position, not a best practice.
- Perhaps the statement worked for existing programs that had to become accessible years ago, but today new programs and services should be planned with accessibility incorporated into the program, not included as an afterthought to the design of the program. Yes, the law gives us the relief under undue burden for extraordinary requests of a program, but our GOAL should be inclusive accessibility.
- This is a minimum standard, not necessarily a best practice.

13. A best practice in accessibility includes the goal that the majority of the facility (building) is accessible for persons with disabilities, unless an undue burden is imposed on the agency.

Yes, I agree	%
10	56%

- State of Hawaii Department of Land and Natural Resources Transition Plan for providing access.
- Just no question at all to this one. PWD should be able to enter the FRONT DOOR and move about the same as anyone else. Period. The only exceptions (to me) are historical buildings/sites, or those whose geography/topography just won't permit it.
- Making certain that all programs within a facility are architecturally accessible
- At minimum 1/3 to 1/2 of existing redundant sites, e.g., 20 playgrounds should be made accessible under the program access approach. More would be better.
- More budgeting. Again, specific, targeted fundraising. Ask for money to make the pond accessible. Grants, targeted donations.
- Persons with disabilities should be consulted in the planning and design of facilities. Full access to all areas of a facility should be available to persons with disabilities. If full access is not possible due to lack of resources or an undue burden to the agency: (a) access to the primary programs areas must be provided; (b) alternative solutions and experiences should be provided in place of other program areas.
- With new construction, all areas open to the public should be accessible unless there is a clear burden imposed, such a small, multi-story building and the elevator would be too costly. In this case, no programming should be planned for the upper level that is not otherwise available to people with disabilities unless there is a very good reason. Consideration also has to be given to the employment of people with disabilities, which means areas for employees only should also be accessible.
- Providing ramps, good signage, enough well marked parking. color contrast, pictograms as well as words
- 17 years after the implementation of the ADA and over 30 years since implementation of Section 504 of the Rehabilitation Act of 1973 leads me to support the notion that no portion of a facility should be inaccessible to people with disabilities at this point in time. If there are facilities that remain inaccessible then they should no longer host programming that is open to the public or an

alternative location should be identified to facilitate inclusion of individuals with disabilities who cannot access the inaccessible area of the facility.

Review facilities and identify all barriers within the facility

Identify potential solutions to removing the barriers or relocating the programs/activities that take place in the area that is not accessible

Identify resources for removing the barrier, if none, relocate the activity to an accessible location.

If resources are identified but the barrier cannot be removed immediately then a temporary option for relocating the activity should be established and implemented until the barrier can be removed.

Seek input from the public using the facilities and who have a stake in the accessibility of the facility to get their feedback regarding prioritization of any plans/use of resources needed to achieve accessibility of the program

No, I disagree	%
8	44%

- Again, a best practice goal wouldn't include the undue burden consideration.
- I believe that this is a current requirement, not a best practice.
- All parts of the facility that are part of the programs should be accessible. If meeting that goal produces an undue burden (needs to be an extreme case that requires detailed justification), then an alternative should be developed to still meet the goal.
- You can't lump all facilities together. The standards have been required since 1992!
- Again, this is not a best practice it is a legal defense position. The best practice position would be to have a goal that all facilities will be made accessible to persons with disabilities to the maximum extent feasible at any given time -- i.e. as resources and circumstances change accessibility will always be a priority in improvements, alterations, additions, etc to the built facilities and environments. If you can't build that ramp today, it merely means that you will look at building the ramp tomorrow -- not that you simply will never build a ramp.

- All buildings where programs are being offered must be accessible, or the program shouldn't be in that building.
- This is a minimum standard, not necessarily a best practice.
- The provision of accessible features in a facility must be provided in accordance with applicable laws and other requirements, not based on a goal that the "majority" is accessible. Especially in new construction, must ensure that all water fountains, restrooms, and other features as required are accessible.

14. A best practice in accessibility fosters an organizational culture and attitude where recreation staff recognizes and promotes the rights of all persons to access fulfilling and enjoyable recreation activities, regardless of ability or disability.

Yes, I agree	%
15	83%

- City and County of Honolulu Therapeutic Recreation Program
- Yes, again, this is just a must. Staff attitude is everything. Negative staff attitude can ruin the 'most accessible' facility and experience. Staff should ASK individuals IF and HOW help should be given...and then LISTEN to that!
- Staff and administrators speak of good customer service across the agency
- Supporting inclusion is a part of everyone's job description.
- The provision of staff training related to service animals.
- Outdoor Explorations is an organization that promotes integration in all activities.
- The agency has a mission, goals, and objectives that promote inclusiveness in all programs, practices, and policies.
- Participation in events like CAST-For-Kids helps staff see that persons with disabilities want to and enjoy activities that they may otherwise not be able to participate in and should encourage the staff to promote this on an everyday basis, not just on special days
- Organization core values should indicate a philosophy that all people in the community, including persons with disabilities have a right to access and participate in recreation services and have the ability to benefit from them in the same way as people without disabilities.
- To achieve such an organizational culture and attitude, you need to have many of the things discussed earlier in the survey in place, i.e., policy, training, facility and program access, etc.
- An organizational mission which includes the inclusion of all and encourages the practice.

- City of Rockford, IL has inclusive programming where the management/organization has worked to ensure that all staff are aware of disability related issues and that all programming involves people with/without disabilities. They have worked to eliminate the "special" title in their programming so that individuals can easily access any programs available and adaptations can be made within an inclusive setting. The staff within this agency have worked hard to bring this about and continue to do so in order to maintain the programming philosophy. It think that this is a struggle when management, staff change because it is not always institutionalized to approach these issues in the same way from one administration to another. It is important that programming policies/procedures are establish to institutionalize these issues so that it is not dependent upon the individuals in the position but that the organizational culture is such that no matter who works in any position there remains an understanding that this is how things are done at that facility or within that entity. Disability is no longer the add on or "special" consideration and that needs associated with inclusion of people with disabilities are addressed from the development of any program and that budgeting, etc. is inclusive of the costs that may be associated with accommodations, etc. instead of looking for the money after the program is planned and it is determined that it may cost more to accommodate.

No, I disagree	%
3	17%

- I believe that this is a current requirement, not a best practice.
- At face value, this is minimum standard, not a best practice. It could become a best practice, depending on what that culture and attitude promotes.

15. A best practice in accessibility includes practices to reasonably accommodate persons with disabilities in recreation and leisure activities through the provision of adaptive equipment and program modifications.

Yes, I agree	%
14	78%

- City and County of Honolulu provision of beach chairs. City and County of Honolulu golf course provision of carts for persons with disabilities and modification of policy to allow people with disabilities to use a cart to ride on the course.
- If people with disabilities have highly specialized or individualized expensive equipment needs (Dragon Naturally Speaking software), then they should supply their own, but if equipment - such as bowling ramps - can be used by a number of individuals, then the program should provide it.
- Sit-down/Stand-up tennis
- Of course...actually, again, this is the minimum requirement.
- The provision of audio loops in museums and classrooms.
- Allowing service animals where animals would otherwise not be allowed. Providing personal care assistance even though it's not required under the ADA.
- The agency has policy to acquire accessible/adaptive equipment where available and strives to modify programs where possible to include persons with disabilities without creating a separate program.
- This is all a part of having good policies and procedures in place to make accommodations as needed or requested.
- Providing as many accessible campsites as possible (not just try to meet minimum number of sites), purchasing only accessible picnic tables, providing at least one accessible play area.
- A program that provides bicycles for rent should have hand cycles available as well. A bowling alley should provide ball ramps and have retracting handle balls available. Theaters should have equipment available to enhance sound for individuals with hearing impairments.

- accessible trails and descriptors of suitability, provision of an interpreter when needed, providing a buddy to assist in the activity
- Availability of sit ski's and other adaptive equipment at ski resorts for rent/lease the same as someone is able to rent standard ski equipment. Some of the ski resorts in Colorado have this option available. Very few in the mid-west that I am aware of (Duluth City Ski Hill (Can't recall the name), Granite Peak (Wausau) that I am aware of. Duluth also has ski instruction available for people with disabilities similar to what they have available for individuals without disability which encourages someone who may not have tried it before to venture out and enables families with individuals with disabilities to participate equally in the activity without having the family member with the disability having to go somewhere else to learn, etc. Everything can be done collaboratively/inclusively with friends, family, etc. Specialized staff are available but they also work with the resort staff to make them more comfortable with the issues/equipment, etc. so that they are able to problem-solve when specialized staff are not available. Does not limit someone from using the equipment/services to only when "specialized staff" are available.

No, I disagree	%
4	22%

- I primarily disagree with the wording. Reasonable accommodation is an employment term. An organization can make reasonable modifications to policies, practices, or procedures unless the modification would fundamentally alter the program.
- I believe that this is a current requirement, not a best practice.
- Required!
- This is a minimum standard, not a best practice.

16. Please identify any additional best practices that should be included.

- Providing accommodations based on RESEARCH and PROGRAM OUTCOMES about the needs of people with disabilities. Evidence-based practice is sorely needed. Model programs need to be conceptualized, developed, implemented, and evaluated...and disseminated to be adopted by others.
- Phase adaptations when appropriate
- The provision of beach wheelchairs, accessible parking closest to program access route, integrated pest management, and accessible restrooms/entrances/routes in all existing facilities
- Recruiting staff and volunteers with disabilities to develop and deliver public programs brings the organization's commitment to access to a higher level and obliterates the "us doing for them" appearances.

Also integrating (as appropriate) information about people with disabilities into the content of exhibitions, tours, public programs lets all of the public know about the roles and contributions of people with disabilities in American, state, and local history as well as in parks and recreation in general.

- Inclusion of accessibility accommodations and improvements in financial planning and budgeting.

Recruiting potential employees with disabilities.

Developing public programming that reflects the diversity of communities to include people with disabilities.

- You are doing a disservice to any park and recreation agency to lead them to believe that their requirements under the ADA are simply "best practices".
- a. A policy to exceed minimum scope of requirements would increase the use of a site. As the population ages, an accessible site, facilities, or program allows aging persons who may not have a specific disability to use and enjoy our site and programs. As has been said many times - we are in position to make these sites useable for ourselves in ten years.
- Preparation and employment of recreation workers with disabilities.
- Full descriptions of activities, one person designed to have the authority to provide, modify, assist staff in provision of services and receive complaints. Full survey of site and activities as well as communications plans and outreach, on at least a five year basis. Appropriate staff should all be involved in review.

APPENDIX C

Round 2 Data Analysis

Total Number of Respondents: 14

Part 1 of 2: In Round One, consensus was not reached on three best practices in accessibility.

- 1. A best practice in accessibility includes the goal that recreation and leisure programs are accessible for persons with disabilities, unless an undue burden is imposed on the agency.**

Yes, I agree	%
2	14%

- As a goal, this is an acceptable statement. It also acknowledges the reality of an occasional undue burden in the making of programs accessible and inclusive for one person in one instance, but not as a whole approach. In other words, a city should not be allowed to say "It is an undue burden for the City of Greenacre to make recreation accessible and inclusive". But the City of Greenacre could say that "John Smith's participation in our golf program is an undue burden because..."
- While it may be a goal to achieve accessibility in all recreation services, and I support this goal, in some cases it may not be achievable. While I think it needs to be interpreted very narrowly, there may be situations where attempting to create accessibility may impose an undue burden as indicated in ADA. For example, a small, remote wilderness camping outfitter program may not be able to make the adaptations necessary for accessibility.

No, I disagree	%
12	86%

- I have changed my answer. "Best Practice" can be defined as a "commitment to using all the knowledge and technology at one's disposal to ensure success." Based on this definition, I agree with some respondents who said this was a minimum standard, not a "best practice" where you would expect a higher level of access without regard to burden.
- An undue burden for one agency may not be an undue burden for another. A best practice, I believe, is an example of an efficient method to provide accessibility. Other agencies may or may not use it as they see fit. Thus, undue burden considerations should not be a factor.

- Undue burden is an exception, primarily for existing conditions. Best practice should not address exceptions
- I continue to agree with those who disagreed. This statement indicates basic compliance with the minimum requirements of the law, not best practice. While even best practice should not create an undue burden on an organization, a best practice should produce OPTIMAL accessibility -- through the best means possible -- for the audience of people with disabilities.
- Same reason as before... a "best practice" and a "legally acceptable practice" are not the same thing. I believe that there are situations where an entity can state that something is an "undue burden" but that is a very high standard, difficult to reach and should be used only under extreme conditions. When looking at "best practices" you look at examples and situations where even if something was an "undue burden" the entity figured out a way around it.
- "Undue burden" merely provides agencies with an "out" and prompts many agencies to figure out ways to avoid being accessible to all. Would not include this component in a best practice statement.
- This is a legal standard per the requirements of the ADA and not a best practice. Would be the same as saying a 'best practice' is to follow FLSA or OSHA standards.
- I agree with respondents that this is a legal/minimum standard but at the same time recognize that there is a very high burden of proof that something is an undue burden so that using this defense should be the "exception" rather than the rule. Entities have used this excuse not to create access because of a lack of consequence for not being accessible. The enforcement system is flawed and has allowed many entities to avoid compliance for a lack of effective enforcement. Not because they are in compliance or can defend an "undue burden" claim. Removing the statement "unless an undue burden is imposed on the agency" would better articulate the "best practice" of full inclusion and access for everyone.
- For all the reasons listed below. When a public entity offers a special program for individuals with a particular disability, but an individual with that disability elects to participate in the regular program rather than in the separate program, the public entity may still have obligations to provide an opportunity for that individual to benefit from the regular program. The fact that a separate program is offered may be a factor in determining the extent of the obligations under the regular program, but only if the separate program is appropriate to the needs of the particular individual with a disability.
- The ADA requires that government agencies provide program access, but private entities are not required under the ADA to provide services unless it would create an undue burden. This standard should not be considered a best practice. Best practice can go beyond what the current law requires to a standard of full accessibility. Entities should be encouraged to consider the ADA

and other accessibility laws as a baseline for compliance, not the maximum effort an entity should be encouraged to provide.

- The goal is full inclusion and integration of people with disabilities. Leave the budgeting and financial considerations to the managers to figure out. Undue burden is specifically a legal term and is not needed in a best practice statement.

2. **A best practice in accessibility includes the goal that the majority of the facility (building) is accessible for persons with disabilities, unless an undue burden is imposed on the agency.**

Yes, I agree	%
2	14%

- Areas of the facility necessary for the program and all of its support components (at a minimum) should be accessible. This is certainly true for a post 1992 facility. The term "majority" has little meaning when considering what should be or needs to be accessible. Areas of no consequence to the services being provided are generally of no concern to the participant with a disability. I don't see how this would be different when thinking in terms of best practice.
- The best practice comes into play here when you are looking at all of the programs offered by the entity are accessible. Not every facility may be accessible for a variety of reasons given the sheer magnitude of facilities out there. If an entity can ensure that all of its programs are accessible through relocation, etc. then they have achieved the best practice of having all of their programs/services accessible. Looking only at the physical structure sells many entities short on whether or not they have achieved best practice. New construction definitely but I have seen even new construction that meets the "letter of accessibility" but the programs remain inaccessible due to policy/procedural issues, etc.

No, I disagree	%
12	86%

- Once again, I have changed my answer with the same reasoning at the previous question. A higher level of access should be expected as a "best practice," without regard to burden. Better planning and creative thought would in most cases, I believe, negate a possible undue burden.
- An undue burden for one agency may not be an undue burden for another. A best practice, I believe, is an example of an efficient method to provide accessibility. Other agency's may or may not use it as they see fit. Thus, undue burden considerations should not be a factor.
- Undue burden is an exception, primarily for existing conditions. Best practice should not address exceptions
- I continue to disagree. I think the term "majority of the facility" is too broad a term to be useful; the statement doesn't account for new construction vs. existing building vs. historic site; and it still reads as a minimum requirement. I think these details would have to be spelled out, the ante raised above the

minimums, and the interaction of the building and the accessible programs (e.g., the ease of use by people with disabilities of the space and its amenities) will have to be explained to fall within the realm of best practice.

- This question still confuses "best practice" with "legal practice". A best practice doesn't include an "exception because of undue burden". The ultimate goal is all facilities being made accessible not just the majority. Can't say I've done 80% and now I can stop, must strive for 100%.
- The best practice should state that the facility is architecturally accessible. At the least, a program originally designed for an inaccessible location must be relocated to an accessible one.
- I am persuaded by the arguments here and would delete the "undue burden" clause here.
- The best practice and goal (it's sort of redundant, either it's a best practice or it's a goal, simplify language) is to make all facilities fully accessible. In the process of doing that make sure the programs, services and activities are fully accessible. Leave financial considerations to management. As previously stated undue burden is a legal term, not needed in a best practice statement.
- The word majority is giving me pause; it is so hard to align this with current new building requirements. Best practice can again exceed the current legal requirement and as a best practice I would want to say something more affirmative such as all programmatic areas are accessible for people with disabilities.
- As previously stated...you cannot view all facilities the same. This assumption could find a professional on the wrong side of compliance.
- The word majority is giving me pause; it is so hard to align this with current new building requirements. Best practice can again exceed the current legal requirement and as a best practice I would want to say something more affirmative such as all programmatic areas are accessible for people with disabilities.
- The best practice and goal (it's sort of redundant, either it's a best practice or it's a goal, simplify language) is to make all facilities fully accessible. In the process of doing that make sure the programs, services and activities are fully accessible. Leave financial considerations to management. As previously stated undue burden is a legal term, not needed in a best practice statement.

3. A best practice in accessibility includes practices to reasonably accommodate persons with disabilities in recreation and leisure activities through the provision of adaptive equipment and program modifications.

Yes, I agree	%
7	50%

- OK, I believe before I was one who said this is a minimum standard. But I'll also say it is a best practice since this statement has no undue burden clause.
- A legal standard. However, 'how' one provides adaptive equipment or program modifications might have a 'best practice' within it.
- a softball field that has a firm and stable surface, accessible dugouts, bases outlined on the field, no abrupt changes in level
- A best practice, I believe includes such general provisions. But the specific practices such as the provision of automatic door openers or providing a greater staff to camper ratio when participants have a disability are necessary to define the best practice.
- Best practice does not necessarily mean going beyond what is required or expected, unless it would substantially raise the quality of or access to, etc. the experience. When the participant with a disability is afforded all the same opportunities as other patrons then this could be considered best practice. There are too many examples of recreation agencies/programs not meeting an expected accessibility minimum. When an agency achieves the equal access/equal opportunities threshold, it puts them in the higher percentile.
- I stick by my first answer and agree to this statement, although I don't like using the term "reasonable accommodation" which is in actuality an employment term. Using adaptive equipment and program modifications, without changing the fundamental nature of the activity, to include the greatest number of participants, including those with disabilities, would be a best practice in my mind.
- Many respondents commented about the issue of "minimum standard" versus best practice but I'm at a loss to define what would be a higher standard than this? I believe the statement reflects best practice, even if it is the legal standard as stated.

No, I disagree	%
7	50%

- "Reasonable accommodation" is a legal term in Title I (employment) of the ADA and the Fair Housing Act, the term does not apply in this context and is confusing. The best practice is inclusion and integration of people with disabilities however that needs to occur. The minimum requirement is providing auxiliary aids and services (unless undue burden) and reasonable modifications of policies, practices and procedures.
- I would want to change the concept from providing accommodations to modifying the program to provide accessible features to allow all to participate, including the provision of adaptive equipment.
- This still reads as a minimum, and, I agree with one of the respondents who disagreed, the term "reasonably accommodate" confuses the issue. While "reasonableness" doesn't have to be discounted even in best practices, the emphasis should be on the level of accessibility the adaptive equipment and program modifications provide. You can spend a small fortune on equipment and still not provide best-practice (or minimum requirement) access.
- Perhaps this is just a semantics issue- but providing readily achievable or reasonable accommodations is the minimum requirement. Certainly, a best practice would include making accommodations, but that is what we are required to do.
- Minimum requirement...not a best practice.
- I would want to change the concept from providing accommodations to modifying the program to provide accessible features to allow all to participate, including the provision of adaptive equipment.
- "Reasonable accommodation" is a legal term in Title I (employment) of the ADA and the Fair Housing Act, the term does not apply in this context and is confusing. The best practice is inclusion and integration of people with disabilities however that needs to occur. The minimum requirement is providing auxiliary aids and services (unless undue burden) and reasonable modifications of policies, practices and procedures.

Part 2 of 2: In Round One, respondents were asked to provide additional examples of best practices. The following questions reflect the examples given by the panel of experts.

1. A best practice in accessibility includes accommodations based on research and program outcomes about the needs of people with disabilities.

Yes, I agree	%
9	64%

- Research supports cooperative learning as a means to facilitate skill development and socialization.
- Sometimes, we see shiny new things or cool technologies, and we invest a lot of resources in them only to find out they don't work. Appropriate background research, market testing, including a measured approach will avoid costly mistakes.
- The change in ADAABAAG that did not differentiate between side and front reach was based on the needs of people with disabilities.
- A ramp as opposed to steps.
- This would be true of any recreation program. Too many programs make decisions without the evidence to support them.
- This sentence can be read and interpreted a couple of different ways. First of all, if "needs" of people with disabilities equates with "desires," the needs would be the same as those of people without disabilities. However, "needs" interpreted as what is necessary to make an accommodation or adaptation for an activity would be different. In that case, I would agree with this statement. An example might be adapting a fitness program and equipment to accommodate a person with a disability. To ensure a "best practice" and success, it would be advisable to base those adaptations on research of equipment and program outcomes

No, I disagree	%
5	36%

- Again, the term accommodation is confusing here since it has legal meaning elsewhere. I know what research is, and I think providing adaptations that are

research based is a good idea, but I don't know what the phrase "program outcomes about the needs of people with disabilities" means.

- My disagreement may be based more on semantics than content. A best practice includes program and facility DESIGN (with the accommodations seamlessly included) based on input of people with disabilities, research, and program outcomes.
- I know what research is and I know what program outcomes are but I am uncertain how they apply to best practices in this context.
- Best practice should incorporate input from people with disabilities about their needs and what works/does not work for them. Establishing "outcomes" can only be done when people with disabilities are consulted regarding what the best outcomes for them may be. This will differ by populations and may differ within the same populations based on age, ethnicity, etc. in addition to disability status. I don't necessarily agree that determining what accommodations are needed necessitates a research project. Involving people with disabilities in the development, planning, etc. provides rich data for establishing programming needs and what accommodations are needed to ensure that everyone can participate. Research with a little "r" versus big "R" may be relevant to identify those entities that have engaged in programs/activities that meet the needs of various groups would be valuable information for any program to have and something that they should already be doing.
- Again, the term accommodation is confusing here since it has legal meaning elsewhere. I know what research is, and I think providing adaptations that are research based is a good idea, but I don't know what the phrase "program outcomes about the needs of people with disabilities" means.

2. A best practice in accessibility includes phasing out adaptations when appropriate.

Yes, I agree	%
9	64%

- Do not want to make participants dependent on adaptations, if possible.
- Adaptations are just band aids - Installing an accessible working surface at a reception desk instead of having a sign up stating that staff can provide assistance
- If adaptations are being provided, they should have been implemented based on findings from an assessment or the expressed input from the participant or his/her care provider. Continuing the adaptation should be based on similar evaluative information. If the program is intended to develop skill or ability, then it would probably be a goal to phase out or lessen the use of adaptations.
- If accessibility and full inclusion can be achieved in a program without adaptations, then they should be phased out. Then the program experience is the same for everyone.
- Assessment of individuals and what they need on an ongoing basis is important. Someone may no longer need an adaptation.
- Adaptations needed can be minimized when the barriers in the environment are removed. This includes making sure that all instructional information (i.e. video's, manuals, etc.) are accessible from the initial design versus requiring a request for accommodation on a case by case basis. Having automatic doors, alarms/systems, information kiosks, etc. that are multi-modal (not solely reliant upon vision, speech or physical ability to operate or access) creates an environment that everyone can access and does not require special accommodation on case by case basis.
- Assessment of individuals and what they need on an ongoing basis is important. Someone may no longer need an adaptation.

No, I disagree	%
5	36%

- A qualified disability is usually permanent. I don't see phasing out adaptations for access as an option.
- I don't understand what "phasing out adaptations when appropriate" means. Is this about programs or facilities? Does it mean the original design is itself so accessible that no adaptations are needed? If that is the meaning (which sounds very much like universal design), even then modifications of policy and practices may be needed based on unique individual requirements. As it now reads, it sounds as if not adapting the program (which, to some, may mean not trying to make it accessible) leads to better accessibility.
- I'm not sure how to interpret this question - it is ambiguous. What does it mean "when appropriate"? Does that mean with a certain percentage of people don't need it anymore? Or does it mean when no-one needs it anymore? A better statement is "A best practice in accessibility involves evaluating and re-assessing adaptations for effectiveness."
- No. Phasing out adaptations or supports is a very dangerous concept.

3. A best practice in accessibility includes full survey of facilities, programs, communication plans, and outreach on at least a five year basis.

Yes, I agree	%
6	43%

- Good one. The Title II requirements don't include this so it is something that exceeds the minimum requirements.
- Need to understand the demands of facilities and programs, in order to make the appropriate adjustments.
- Things change over time, such as caused by erosion or new devices for effective communication. Re-evaluation is a must.

No, I disagree	%
8	57%

- I vote for every three years.
- A full initial facility and programmatic survey would be a best practice for any program. Additionally, those surveys must be updated at the very least periodically and whenever new programs, facilities, etc. are added. I disagree on the time frame. I think a review at least every three years, maybe not a full accessibility survey, should be done.
- I think five years is too long between evaluations/surveys. I think there should be ongoing evaluation of some accessibility related components, such as available communication technology, adapted equipment or identifying changes in the community constituencies.
- A best practice should include a "Readers Digest" survey every 3 years
- I think this needs to be qualified to include at least some ongoing assessment. Lack of maintenance of accessible features, introduction of new (inaccessible) technologies, new (inaccessible) programming, and staff turnover can ruin accessibility, not to mention best practices, in much less than a five-year period.
- Again, the question is not answerable. Yes - a best practice is to continuously assess the effectiveness of programs/accommodations and physical facilities but

does it have to be a "full survey"? Does it have to happen on a five year basis? All of that would depend on the specific situation and circumstances.

- Best practice includes incorporating accessibility into all operations of an entity so that accessibility is considered along with all other relevant issues when reviewing a program, addressing facility related issues, planning new programs, etc. If these issues are not institutionalized and become part of the overall operations of an organization a periodic review every 5 years is meaningless. An entity will constantly be playing catch up. Policies and procedures need to be reviewed, modified and implemented to assure that accessibility and inclusion are a part of all discussions relevant to a program/activity throughout the life of that activity. No change, modification, repair, etc. of a facility should occur without accessibility as one of the "check offs". In addition, no new program should be created without accessibility front and center in the creation. No existing program should be reviewed/modified without accessibility front and center in that review. It should not be "special" or an afterthought.
- The time frame may not be appropriate for all agencies and/or programs. It should be based on the needs of the agency, work completed, changes in policies, etc.

4. A best practice in accessibility includes one person designated to have the authority to provide, modify, and assist staff in provision of services and receive complaints.

Yes, I agree	%
7	50%

- In an ideal world, it would be nice if everyone on staff takes full responsibility for accessibility. But in reality, training all staff is best, when they know that there is one person to whom they can turn who has the expertise, knowledge and experience in the field of accessibility and who has the ultimate authority to make a decision regarding the provision of services and accommodations. Additionally, complaints really do have to be handled by one (or two or three - but specifically designated individual(s)) person who is specifically trained to deal with complaints and who has the authority and resources to resolve the issues.
- Having one person as the point of contact not only shows the public that the owner takes this issue seriously (who is in charge here), but also helps staff know who to go to if there are problems. Most other services provide a point of contact
- An "expert" with authority. (i.e. to evaluate new facilities, training, part of job to keep up with new requirements for access)
- Without one individual there is usually confusion from the public, an unfocused response and concern and lack of attention. There can be a whole team of Specialists but with one single "leader" who is the contact person. This individual should also have the authority to make basic decisions and to oversee the service provision and complaint process.
- Many agencies and organizations have disability coordinator, ADA coordinator, and Section 504 coordinator. At this point having such a person is helpful so that other staff know where to go to hire sign language interpreters, get adaptive equipment, and get ideas. As agencies and organizations become more knowledgeable about what people with a variety of disabilities might need to participate the one person coordinator could be phased out.
- And it is required that there be a system in place...
- Without one individual there is usually confusion from the public, an unfocused response and concern and lack of attention. There can be a whole team of Specialists but with one single "leader" who is the contact person. This individual

should also have the authority to make basic decisions and to oversee the service provision and complaint process.

No, I disagree	%
7	50%

- I don't think one person should have the sole authority. I think staff should be empowered to provide or modify services to enhance accessibility through creative planning and consultation with participants and other staff members.
- This is a dated practice. Accessibility is the concern of any number or administrators, supervisors or even front-line staff. Accessibility suggestions/complaints or strategies should be integrated into typical channels for all such communications. If there is not an acceptable response, then it should move up the ladder as usual.
- Again, I may be arguing wording more than intent. I think a best practice includes a permanent position or at least part of a position with "the authority to provide modify, and assist. . . ." That position must be filled by a qualified individual who has experience and understanding about providing access. We all know about the 504 coordinator who is really an accountant and has this assigned as a collateral duty (and knows nothing about it); or the dedicated person who develops a grassroots program, leaves the organization, and has no one remaining in the organization to take up the carefully built program. This position must also have the full support of senior management to be successful.
- Not necessary if all staff have the skills to accommodate.
- This is already required and is called the designated responsible employee.
- I don't necessarily believe that having all power/responsibility resting with one person is necessarily best practice. In large systems it may not be realistic to have only one person in this role. There may need to be someone identified with authority within different aspects of programs/facilities (i.e. Outdoor facilities, water related facilities, classes/courses, etc.) in order to assure that the workload is realistic and that adequate expertise in these areas is available. Someone with facility expertise may not necessarily be expert in program access and I don't believe it's realistic to expect that as a best practice. Overloading someone so that they can't respond to anything in a timely manner is not best practice. Infusing the expertise across many aspects of the management of a program is likely to have more systemic affect. The size of an entity may make the difference here more than anything.

5. A best practice in accessibility includes recruiting staff and volunteers with disabilities to develop and deliver public programs.

Yes, I agree	%
13	93%

- Yes. Just as women in parks and recreation are effective in serving female customers, so will be recreation specialists with disabilities.
- It is always a best practice to include members of the community one is attempting to serve to develop and deliver programs. However, the individuals must still be qualified to fill the positions for which they are being recruited.
- NPS's park rangers and superintendents with disabilities send a strong message to the public that accessibility is important and not only a token or transient consideration.
- It is always important to have the actual users involved in the development and selection of programs and services. Including people with disabilities to a design or survey team will ensure that issues that may not be known to people without disabilities are addressed. However, you do need to be careful not to get tunnel vision - all people have different levels of ability, interest, etc. and what may work for one person may not work for another.
- Involvement of individuals with disabilities in program planning and as staff provides user opinions and insights into cost effective and efficient methods.
- I think this is a form of affirmative action for persons with disabilities, and have no problem with it. Based on my experience, a qualified person with a disability in a position of program planning and delivery has numerous positive benefits that might not otherwise be achieved without him/her.
- Yes, definitely, qualified people with disabilities should be considered for inclusion as staff and volunteers for any program.
- As with other minority groups sensitivity and "walking the walk" is very important with the disability community as well.
- Yes, people with disabilities will have the personal experience and may help others with disabilities to feel more comfortable participating.
- Staff/volunteers in any program should reflect those that are served by that program and serve to mentor/teach, etc. where applicable. This is a universal best practice across all aspects of age, disability, cultural differences, etc. Including people with disabilities in the mix of

staff/volunteers is logical. More important is having "qualified" individuals within these positions which also includes having programs that pro actively develop opportunities for people with disabilities (kids, youth, and older adults) to have opportunities to be volunteers and that may eventually lead to paid staff positions. Many volunteer programs do not adequately accommodate/recruit people with disabilities because they don't know how to accommodate them.

- IF...the staff and volunteers with disabilities ARE QUALIFIED.
- As with other minority groups sensitivity and "walking the walk" is very important with the disability community as well.

No, I disagree	%
1	7%

- Not necessary, but good practice.

6. A best practice in accessibility includes integrating (as appropriate) information about people with disabilities into the content of exhibitions, tours, and public programs.

Yes, I agree	%
11	79%

- An excellent way to market inclusive programs.
- People connect with things that are reflective of their own experiences or which they can identify with in some way or another. We like to see ourselves, people like us, in programs, exhibitions, performances, films, etc.
- The dispute over the FDR memorial in DC -- whether the memorial should show FDR's disability -- made clear how important it is to include information about people with disabilities, as appropriate, but also in appropriate ways.
- Individuals with disabilities may be participants, so we must have information and resources available to effectively modify the program.
- Program information used for marketing and public relations often depicts a desired outcome or situation. If you want to be an inclusive program then it would be reasonable to indicate this in your materials.
- Yes, definitely again. For instance, the tours and exhibitions at Ellis Island would not be accurate if they did not include the story of how immigrants with disabilities were "weeded out" and denied entry into the U.S. The same goes for the Holocaust and the numbers of people with disabilities who were singled out and murdered, tortured, and used in experiments based solely on the presence of their disability. The "story of disability" is often a key part in many presentations.
- Again universal design and provision of information that can be useful not only to those who consider themselves to be a member of "those with disabilities", but also an individual who maybe older or who considers themselves just to be unable to walk, talk, move a certain way, etc., but not severely enough to be considered in their mind to be disabled.
- Information and materials used by the program to demonstrate services through exhibitions, photographs, visual media of any kind (video, etc.) should represent the range of clients served by the program which would include people with disabilities.

No, I disagree	%
3	21%

- Can't answer this because I don't know what "information about people with disabilities" means in the context of a recreation program's exhibitions, tours and public programs.
- Do not think that this is a best practice. Obviously accomplishments of people with disabilities should be acknowledged. But often it comes across as "amazing what those people can accomplish". Content of programs should be transparent
- How does providing information about people with disabilities into the content of exhibitions or tours make them more accessible? It may promote a positive attitude but does not really address accessibility.

7. A best practice in accessibility includes expenditures related to the purchase of adapted equipment, services, and/or accessibility improvement projects in the financial planning and budgeting process.

Yes, I agree	%
14	100%

- Once disability equipment is in the budget it becomes a less debatable issue. Many folks feel that to take money out of "their" budget is a hardship but do not mind spending "other peoples' money"
- Any program should examine all associated costs and determine what they are and how they will be paid for. This includes understanding how costs that may not be consistent (i.e. sign language interpreters) play into planning or classes, etc. and if the entity is charging for services how these costs would be built into the overall fees associated with the program. Capital costs associated with new construction that may include some elements required to ensure accessibility should be reflected in the overall costs of the project and anything attributed to accessibility should not be identified as a separate cost. Long term planning should include costs associated with making necessary modifications to existing facilities that improve accessibility. Best practice would be to establish a long term plan with associated costs related to achieving full accessibility in all facilities, even if a program can be relocated, etc. The eventual goal should be to achieve full accessibility in all facilities over time while maintaining program accessibility through alternative methods until the facilities can become fully accessible.
- Maintenance and upgrades should be incorporated. Technology changes that enhance accessibility should be anticipated so that when new technologies are available which enhance accessibility there are funds available to purchase them.
- Expenditures for accessibility MUST be included in the original budget planning process for any project. For instance, the budget for production of a film or other AV program must include the cost of captioning, not as an afterthought or add-on when the film is printed. That is the only way to be assured that accessibility will be included in projects.
- While accessibility tends not to be high-cost, it does need to be part of budget planning. For example, a snow skiing program should have equipment available for participants with disabilities. These are not inexpensive items. They should also pay for the training of staff to serve the needs of these participants.
- Funding specifically budgeted (line item) for access related devices, facility rehab, etc. establishes a priority and hopefully ensures that money will be spent on needed access.

- Not sure if this is a "best practice in accessibility". The planning and budgeting process should ensure that expenditures for all issues - accessibility, safety, life safety - are accounted for in the process. If you need an accessible picnic table, then an accessible picnic table needs to be purchased.
- The Smithsonian's Accessibility Program has a standing budget to cover auxiliary aids and services to ensure that interpreter, real-time captioning, alternate format production, and other services are consistently available to visitors with disabilities.
- No brainer. Best practice or not, access starts with budgeting and anticipating expenses.
- It may be the only way to get it done, and certainly an outcome of an accessible agency mission.
- Without expenditures as evidence, it might be hard to prove compliance. I'd strengthen this by saying "centralized" information related to the purchase of...
- Having a budget for interpreters, alternate formats, etc. is essential to ensuring that needs are met.

8. A best practice in accessibility includes public programming that reflects the diversity of communities to include people with disabilities.

Yes, I agree	%
11	79%

- Programs should always reflect the diversity of the community, which inevitably, will include people with disabilities.
- This seems obvious, that people with disabilities are a part of all communities.
- And reflects diversity within the disability community.
- Individuals with disabilities have interests and skills as varied as anyone else. (i.e. sports, classes, travel, etc.)
- Public programs should engage in outreach to local disability organizations to be sure their needs are being met. This is particularly true if it is apparent that people with disabilities are underrepresented in their programs. An assessment of needs and services being provided should be done.
- People with disabilities are part of the community, not a separate feature of one. Accessibility should be included in public programming as a matter of course, not an additional thought, to insure participation by community members with disabilities.
- People with disabilities need to be considered part of the diversity programming and not just a separate category.

No, I disagree	%
3	21%

- Again, do not think that this is a best practice in accessibility - it is a best practice for programming. Public programming should include all people, not single out people with disabilities (again - need to avoid perception that it is amazing that those people were able to do this or that).
- I am not sure if this is best practice anymore. There is an expectation of all entities that they should reflect their constituency and community membership which is inclusive of people with disabilities. This should be a minimum expectation.

9. A best practice in accessibility includes a policy to exceed minimum scope of requirements.

Yes, I agree	%
10	71%

- Must go well beyond the laws which are merely minimal standards.
- To quote Ray Bloomer, "Minimum requirements are the WORST you can do." By definition, BEST practices exceed that. A 1:12 ramp is the minimum; a 1:16 ramp better serves more people and is, therefore, better practice. A policy makes that happen consistently.
- Minimum scope does not provide for everyone with a disability. The policy should indicate that the needs of every person with a disability will be met in order for them to participate if that is possible within reasonable resource and safety considerations. The intent of the policy should be understood that it will be interpreted whenever possible to create access for individuals.
- Every program should have a policy to exceed minimum requirements whenever possible and desirable. For instance, in construction or renovation of a facility, slopes, entrances, restrooms, etc. should exceed those minimums -- use less steep slopes and ramps, wider entrances, etc.
- Minimum scoping such as the ADA should always be considered the baseline or minimum, not the maximum that should be done! A policy that expects a greater level of accessibility challenges those responsible for services to evaluate how to better provide services and not just meet the stated minimum.
- Incorporating policy and practice that looks beyond the legal requirements is essential to a best practice in accessibility. Doing more than required in facility access means that you look beyond 1 stall in the toilet room that is accessible and that the ramps are usable, not just minimally accessible (1:12 slope) and that sign language interpreters are scheduled for all activities and only canceled when someone does not request them, not visa versa when entities scramble to find an interpreter when it's requested and often can't because of timing, etc. Being proactive versus solely reactive is a measure of best practice in accessibility. Build it and they shall come versus build it when they do come.
- Must go well beyond the laws which are merely minimal standards.

No, I disagree	%
4	29%

- Would agree with this statement if the phrase "wherever possible" was added. While a goal to exceed minimum scoping should be considered in any design or development of facilities or programs, to require an owner by policy to exceed requirements may not be doable due to site conditions, funding issues, or program goals.
- Exceeding the requirements, such as providing automatic door openers on all outside doors, is of course a best practice. Also, there may be many ways to provide the required access. Some may be more effective than others. So all should be eligible.
- Not sure you need policy to exceed min requirements.
- What does "minimum scope of requirements" mean? As stated, this best practice does not offer much guidance.

APPENDIX D

Round 3 Data Analysis

Total Number of Respondents: 12

In Round Two, eight questions were asked where the expert panel did not reach consensus.

1. A best practice in accessibility includes practices to reasonably accommodate persons with disabilities in recreation and leisure activities through the provision of adaptive equipment and program modifications.

Yes, I agree	%
6	50%

- I still agree. I wonder if those who disagree don't believe a program could be a "best practice" if it included accommodations through adaptive equipment and program modifications? Or do they think that provision of such would just be a "minimal" practice?" I disagree with both opinions. I've seen "best practices" defined as practices that the provision of assistive listening devices, accessible playground equipment with a variety of elements, 508 accessible computers.
- Have produced outstanding results in one situation that could be adapted in another situation. I certainly think a program that may be designed with the use of adaptive equipment/program modifications could produce outstanding results and should not be dismissed as a model for other program providers.
- Best practice may be a different way of providing accessibility. Reasonably accommodate has too often related directly to dollars spent or work effort needed. best practice allows a different thought process and mind set to consider other factors in solutions
- The concept of reasonable accommodation is relevant to any considerations of creating accessibility, not just employment at least that has always been my understanding. And, the way this statement is worded, it includes reasonable accommodation as part of the practice, not necessarily as its primary or only consideration. I don't think we can boil best practice down to one way of doing something, particularly while we are still experimenting with how to interpret the law and what is best in so many specific activities and for such diverse populations. As we continue to experiment, the boundaries of what is reasonable will be pushed out further.
- I realize that many respondents have expressed that providing equipment is already required and thus, this statement is a minimal compliance issue but best practice is actually having a range of equipment available across the wide

variety of programs/service available to enable someone to learn how to use the equipment if they are not familiar with it already and to not have to purchase their own equipment (i.e. having a variety of sit ski's or other type of ski equipment available at a ski hill for someone to use) even though from a legal standpoint it could be argued that providing specialized equipment was not necessarily legally required but modifying the policy to allow someone to take their own sit ski on the ski lift would be required. The range of equipment that would be needed to accommodate a wide variety of users in recreational settings is extensive and best practice would be having that range available as that would demonstrate going beyond the minimum of the law.

No, I disagree	%
6	50%

- Modifying programs and providing adaptive equipment are minimums. How you do it and with what may be best practices.
- If it read "include" instead of "reasonably accommodate" and "program modifications" was changed to "accessible program design," I think it would better describe best practices.
- The statement is too limiting and confusing. How about...The use of adaptive equipment and other program modification are possible ways to accommodate persons with disabilities in recreation and leisure activities.
- Reasonably accommodate is not the correct term. Should be to include PWDs by providing adaptive equipment and program modifications.
- This question asks for "best practices" through the provision of adaptive equipment and program modifications.....normally I would say "best practices" go above and beyond what is expected or required but as it relates to program modification.....I would expect the best modification to be considered when including a person. "Best practices" might be more easily recognized in the example of a playground. There is a minimal level required for accessibility but there are many more implements that can be added to increase the level of accessibility.
- My disagreement continues to be with the use of the words 'reasonably accommodate' as an employment term. I would agree with the following, if changed: A best practice in accessibility includes policies and procedures to provide adaptive equipment and program modifications.

2. A best practice in accessibility includes accommodations based on research and program outcomes about the needs of people with disabilities.

Yes, I agree	%
7	58%

- The provision of "modifications", which meets the need of the various degrees of disability. For example, individuals, who are hard of hearing are not deaf and must be able to use what hearing they do have in the program setting. Therefore we should have available at least three types of "modifications"- Assistive listening devices, captioning, and sign language interpreters.
- Yes, a best practice 'includes' accommodations based on research and program outcomes but that is just one slice of the pie.
- If you do not include the individuals into the decisions of how to solve issues and ASSUME what works best you often are wrong. Proper research includes samplings of a wide range of individuals, their specific "modifications" and its success. To sell products you do market research. If your research was sound the product is more likely to sell. if you have no, or poor research, i.e. ask the wrong questions you will get the wrong answers and the likelihood of failure increases dramatically
- Using data to validate your program or to improve it is a best practice.
- I think it includes data-based evidence when such evidence is available and can reasonably be expected to exist. At the same time, I think we need to raise expectations that such data should be available and provide the resources to do such research.
- Research can inform policy makers and assist in making an argument "why" something is needed, especially if that research is participatory action research where the individual is included in determining the problem(s) and shaping the process for determining the outcomes. For example, examining how people who use electric scooters experience various features (i.e. lifts on buses, turning radius in bathrooms, etc.) leads to information that informs those involved with establishing relevant standards/guidelines. People with disabilities should be central to any decisions about them and thus, any programs that may be considered should incorporate feedback from people with disabilities (program design, implementation as well as evaluation of effectiveness once implemented).

No, I disagree	%
5	42%

- After reading what other respondents wrote, I disagree with the statement as written because it implies that people with disabilities themselves are not consulted about what accommodations might be best for them. I agree that decisions on accommodations based on research and "perceived" outcomes are also vitally important, but the statement should, as pointed out by others, include input by program participants (people with disabilities) themselves. Initial program planning could be done based on research and perceived outcomes, but must leave room for "tweaking" based on individual needs.
- I still feel that this one smacks of "we'll decide what to do for them," which doesn't say "best practice" to me. I'll stay with the following: A best practice includes program and facility DESIGN (with the accommodations seamlessly included) based on input of people with disabilities, research, and program outcomes.
- As stated I don't think this gives much direction. Should you research ways to accommodate the needs of people with disabilities...yes! Should you have program outcomes...yes! But shouldn't you have "program outcomes" regardless?
- I think that utilizing the experiences of people with disabilities is a must in addition to research and identifying program outcomes.
- My disagreement continues to be with the use of the words 'reasonably accommodate' as an employment term. I would agree with the following, if changed: A best practice in accessibility includes modifications based on both research and program outcomes about the needs of people with disabilities as well as modifications for specific individuals on a case-by-case basis.

3. A best practice in accessibility includes phasing out adaptations when appropriate.

Yes, I agree	%
8	67%

- I agree, even though I am making assumptions about the statement. I'm assuming "when appropriate" means when they are no longer needed in order for everyone (full inclusion) to benefit from the program -- not when someone decides that MOST people don't need them anymore. An example might be captioning a visitor center video instead of handing out a written script for the production.
- If an adaptation is a temporary measure such as a portable accessible ramp or a portable accessible toilet, these must be phased out as soon as permanent accessible facilities are constructed.
- It is important to determine when full inclusion can be accomplished, either by the proficiency of the individual, design (of equipment and or facilities) or by advances in all of the above. Pushing an entity to consider phasing out or removing adaptations is rarely on the radar screen.
- When appropriate surely seems to mean when it is in the best interest of the participant with a disability (other considerations aside). Through specific observations and other evaluations, a service provider should be able to determine when an adaptation is still serving a needed purpose and when it is or has become a barrier to progress or just not needed anymore.
- I agree with this as it relates to the progress of a participant in an inclusive situation. i.e. a gymnastic class for a young child with a disability. Over time, the child may become more comfortable with the class and the instructor and the instructor may become more comfortable teaching the child that the support may be lessened and eventually eliminated. It depends upon the situation.
- I interpret this question to mean that adaptations are often needed because a barrier exists within a certain environment or program. Adaptations are at the individual level but can also be applied at a macro level. For example, temporary adaptations may be made in environments that are not currently accessible but once renovation is done to a site/facility then the adaptation may no longer be needed (i.e. beach mats may be used in areas where there are no walkways that are accessible but when renovations are made to the area the path of travel is developed that meets the Accessibility standards and then the adaptation of the beach mats as an accessible surface is no longer needed.

No, I disagree	%
4	33%

- I agree with all the disagreement comments. I think this has to be re-done or eliminated.
- The question is difficult to answer in its wording. Another respondent stated the disagreement very well. "What does it mean ...a certain number of people do not need it or percentage, it could also include no one is participating anymore, there is new or better products or designs and the adaption is no longer needed for anyone. i.e. electric sensor faucets vs. levers or knobs. or computer e mail web registration for programs from home vs. driving to and inaccessible site to be in line and unable to fill out a form because the counter is too high
- Don't agree or disagree. The "best practice" would need to define what is considered an "adaptation" and a best practice on "when it is appropriate"
- I think this needs to be reworded to take a positive approach -- that a best practice means designing universally and including adaptations only when necessary.

4. A best practice in accessibility includes full survey of facilities, programs, communication plans, and outreach on at least a five year basis.

Yes, I agree	%
5	42%

- We build or alter facilities on a continuing basis and often forget about required directional signage to accessible elements. A regular survey of facilities should identify these oversights. Also, a system of for survey of newly constructed facilities must be established to ensure that contractors have met requirements before we sign off as completed.
- Five years could be a good time frame for many. Other factors may require a shorter time frame, new facilities, a significant change in the population, i.e. a new sport or activity which has brought greater participation in individuals with disabilities participating; Staff change overs with the program provider may make revisiting the facility and reevaluating the program necessary. Accountability of accessibility to buildings, structures, sites, programs etc all may have different time frames. It may very well depend on the size and or budget of a provider. Possibly linking it to the schedule for budget requests, and requiring an accessibility accountability/update is a better way to track.
- I think the idea of a FULL survey as described is best practice and would be a big undertaking, requiring a lot of knowledge about accessibility in all of these areas. Attempting to do this more frequently than 5 years would be unrealistic. At the same time, a mechanism should be in place that triggers a review when an accessibility concern arises at any time.

No, I disagree	%
7	58%

- After reconsideration, I disagree with the statement as written. I believe an initial COMPREHENSIVE accessibility survey should be completed with action plans to correct deficiencies completed in a timely manner. From that point on, new construction must be accessible, new programs must be designed to be accessible, new policies and procedures must be designed to not discriminate against people with disabilities, and new staff must be trained with regard to access and disability issues. A review of programs, facilities, practices and procedures should then be undertaken, not a comprehensive accessibility evaluation, at least every three years.

- If accessibility is incorporated into the on-going operations of the organization and if accessibility is something ingrained in the organizations structure/philosophy and operations then periodic review of "accessibility" such as identified in this question should not be necessary. Best practice is when accessibility is no longer "special" and that the issues that are typically singled out as only related to accessibility become viewed as part of the overall operations and are reviewed/assessed/etc. at the same time any other issues are addressed. Removing this issue as a "special" consideration that requires a separate structure to review it will mean that you have achieved best practice.
- A best practice in accessibility includes a periodic survey and assessment as the program changes.
- I believe that "best practices" includes an assessment on an ongoing basis.
- Every three years
- Five years is arbitrary. The frequency is dependent on many factors including level of alteration and new construction, changes in department policy, etc.
- I think this must be qualified by an ongoing assessment requirement.

5. **A best practice in accessibility includes one person designated to have the authority to provide, modify, and assist staff in provision of services and receive complaints.**

Yes, I agree	%
3	25%

- A focal point with authority to get it done or complain to must be identified on brochures, signage, web sites, posters, etc.
- As long as there is a team that works with the designated person that has the needed expertise in a variety of areas such as facilities. If there is no one person that is assigned this task and to assure that accessibility is provided, then often, even in the most well intentioned facilities, it can become overlooked or underfunded.
- I think size is very important here. In a small agency, having one person in that position of authority would be sufficient. In a large agency with multiple operations and facilities, one person would probably not be sufficient. I also do not support the approach of one person having absolute authority in this position. More people need to be involved in the decision making process. I am more comfortable with a coordinator that educates, facilitates, organizes, etc.

No, I disagree	%
9	75%

- I still disagree that one sole person should have the authority to do all that this statement suggests. (Here is where wording becomes misleading.) I believe all staff should be empowered to "provide, modify, and assist staff in the provision of services." But I would agree that at least one person on staff should have the knowledge and authority to address complaints in a positive manner. Additionally, while all staff should have knowledge of accessibility and disability issues, at least one person should have additional expertise and knowledge, as well as authority to make agency decisions, to serve as the point of contact and resource person for issues or needs that may arise.
- The "one-person" rule may interfere with others throughout the agency coming on board.
- Perhaps if it is modified to state that the person is in senior management and trained in access issues.

- This combines too many issues. Yes...one office place needs to be designated for complaints. Other issues may benefit with a "coordination" role, but the responsibility (as other respondents have explained) rests with everyone - the landscape architect, program leader, or bus driver.
- Given the incredibly large range of accommodations, modifications I have never worked with anyone who has that much authority, knowledge or budgets to take full responsibility. Accommodations in transportation, site modifications, i.e. trails, benches, swimming facilities, size or style of type on brochures, locations of sign language interpreters, training of staff and access to budgets. perhaps a designated leader but a committee, which involves persons knowledgeable in disabilities, budgets, construction, technology, marketing, equipment, and users, community participants. is likely to be more successful
- I believe it is the responsibility of the instructor, inclusion assistant, facility administrator etc. Whoever is in charge of the area/program. If it is a yoga class then it is that instructor. It is gymnastics it is that instructor etc. Having a knowledgeable TR folk working in the situation is best practice but the reality is not all community settings have a TR staff. All should be educated on the process and documentation necessary.
- Decision making should not rest with just one person. There should be an ADA Coordinator for a program to help facilitate and resolve difficult questions but not be the only one to make decisions.
- The practice of a designated person is a "legal" obligation and not necessarily best practice. Best practice would be when all staff are trained and knowledgeable about accessibility and issues concerns modification of policy/procedure, etc. are address the same way any request is handled within the organization. Individual staff should be empowered/trained to make decisions regarding what is needed and authorizing modifications/accommodations based on the need of an individual user. Gray areas exist within all policy interpretations so management should be consulted when necessary the same as they would for any issues that cross over into gray areas for their staff.

6. A best practice in accessibility includes integrating (as appropriate) information about people with disabilities into the content of exhibitions, tours, and public programs.

Yes, I agree	%
8	67%

- I still agree with this statement. The content of exhibitions/tours/public programs would not be the best it could be if it did not include information about people with disabilities WHEN APPROPRIATE.
- Accessible facilities and the availability of assistive listening devices, captioning, and sign language interpreters at visitor centers and museums.
- I think including information in exhibits about the disabilities of famous people, that people with disabilities lived in an historic area, disability rights issues in the context of the greater civil rights movement, etc. is important for visitors with disabilities to see themselves in exhibitions as well as for visitors without disabilities to see people with disabilities as part of the fabric of our society -- then and now.
- Persons with disabilities must be integrated into exhibits, tours, etc. The accurate depiction is also important, WHY didn't we see so many folks using wheelchairs in the past, weren't as many, they couldn't get there! or get in, its all valid, hopefully depicting individuals with disabilities into all programs, marketing will be a standard very soon, and not just showing "super gimp" or oh poor pathetic we feel bad for you image either
- PWD's are a part of society and as such should be included as appropriate.
- It is absolutely appropriate to consider people with disabilities and their stories/needs/accomplishments/etc. as noteworthy. If we are allowed to hide PWD from our conversations then we are encouraging their exclusion in all other ways. It is certainly related to accessibility, particularly when you consider that attitudinal barriers are the biggest barriers to access and inclusion for PWD in this and other countries.
- This depends.....I agree that bringing attention to accomplishments is not necessary but advertising how accessible a facility or a playground is does help.
- Pictures, video's, demonstrations, etc. should include people with disabilities as part of the diversity of participants the same as you would consider diversity in terms of age, sex and racial/ethnicity. Best practice is recognizing people with disabilities as part of the overall diversity within a program and including them in ways that are meaningful to the audience that is targeted and ensuring that people with disabilities are not held out as "special".

No, I disagree	%
4	33%

- I don't know what this means. A best practice includes ensuring that people with disabilities are represented equally as users in the content of exhibitions, tours, etc. to show inclusiveness.
- What is meant by "information about people with disabilities?"

7. A best practice in accessibility includes public programming that reflects the diversity of communities to include people with disabilities.

Yes, I agree	%
11	92%

- I still agree. While this should be a "minimum expectation," it is still a best practice to make sure it happens.
- The provision of both integrated and non-integrated program experiences such as accessible facilities and assistive devices for all programs and a wheelchair basketball or Special Olympic program.
- People with disabilities are part of the diversity of our country and should be reflected as such.
- Inclusive programs, buildings and sites is the point. Focusing only on wheelchair access as an after thought or equipment for individuals as a way to accommodate after the program exists is the backwards way of including persons. Understanding the communities broad diversity , age, ethnic, religious, and disability are all part of successful programs
- Full inclusion in programming is still rare and thus a best practice.
- A narrow view of best practice would see accessibility isolated from other practices. I think it is important to see and encourage the interrelated nature of access with events that expand community awareness of its diversity. Fundamentally we are talking about human differences and what communities believe and do in regard to acceptance and inclusion. This potentially impacts local decisions about resource allocation and other policies regarding accessibility.
- I would like to think that all communities should/would serve their constituents but the reality is that not all communities do address the needs of people with disabilities. So, best practices are a community that offers programs. Hopefully this will change with time.
- Example - A brochure would show a full range of users to the program.
- People with various types of disabilities should see themselves in the programming that is provided. This includes integrating children with physical disabilities that use wheelchairs into all programming as appropriate but at the same time look at options of offering wheelchair basketball programs, quad rugby, etc. Communities need to recognize that people with disabilities are

looking for sports opportunities that allow them to maximize their skills/talents within competitive and non-competitive arenas.

No, I disagree	%
1	8%

- What is meant by "public programming"?

8. A best practice in accessibility includes a policy to exceed minimum scope of requirements.

Yes, I agree	%
10	83%

- Still agree with this statement. I would concede to adding the wording "whenever possible" to the end of the statement, although I think it would be assumed.
- The provision of automatic doors, beach wheel chairs, and single rider golf-carts are not believed to be required but should be.
- I too must quote Ray Bloomer, as I often do, minimum standards are the WORST you can do the difficult part is to have a policy? I am not sure that it is the best way to ensure achieving best practice yet I can not think of a better way.
- Often min requirements are seen as the maximum needed to do for accessibility.
- Assuming that practice follows policy, and an agency wants to create the most accessible environment/services they can, then a policy that provided guidelines for exceeding minimum standards would be necessary. In this way, the policy would be rewriting the standards to establish a new minimum expectation. Such a policy would need to be as specific as possible.
- Policy that supports use of universal design goes above the minimum standards and should be what entities strive for. For example, a design that offers both a stairway and a ramp as options to enter the building does not reflect universal design. A policy that requires that any feature be able to be used by "everyone" would support universal design and go beyond the minimum of legal compliance.

No, I disagree	%
2	17%

- "Best practices" always exceed minimum requirements. That is what makes them exemplary.
- What is the minimum scope of requirements" This needs to be more specific. Are you talking about "design" requirements? Program, etc.

APPENDIX E

Round 4 Data Analysis

Total Number of Respondents: 9

In Round Three, six questions were asked where the expert panel did not reach consensus.

- 1. A best practice in accessibility includes practices to reasonably accommodate persons with disabilities in recreation and leisure activities through the provision of adaptive equipment and program modifications.**

Yes, I agree	%
4	44%

- We can continue to argue semantics, but the intent is this: does best practice INCLUDE the provision of adaptive equipment and program modifications. It must!
- The provision of access related policies and procedures such as for obtaining signers and for identifying access coordinators. To me, best practices are not maximums but rather successful ways to provide at least the minimum access. If more than the minimum is provided that is great. For example a very well written easily understood and artistic brochure or newsletter to inform users with disabilities of the access policies and procedures or the location of accessible facilities is a best practice and may be used as a guide to others for providing required access notification.
- single rider golf cars, water chairs at pools

I DO AGREE WITH THE non-agreeing respondent...call this "making reasonable modifications for a person with a disability by providing adaptive equipment"

I DO AGREE that this is a minimum...but let's get on with it

No, I disagree	%
5	56%

- My same concern about the use of the term 'reasonable accommodation' remains.
- I continue to disagree. I believe a best practice requires accessible program design first and only then additional modifications and equipment to make activities accessible to individuals, if needed.
- The best practice should represent the possible ways to reasonably accommodate persons with disabilities. It is NOT an option. It is required.
- I can go along with the statement that a best practice "includes" reasonable accommodation individuals with disabilities if the sentence doesn't stop there. It must explicitly state that reasonably accommodating someone by itself is not a "best practice". Best practice must mean to go above a minimum requirement to be an exemplary.

2. A best practice in accessibility includes accommodations based on research and program outcomes about the needs of people with disabilities.

Yes, I agree	%
5	56%

- At least part of the argument against this statement has been that it doesn't provide for input of people with disabilities. First, good research and program outcomes on accessibility would have to include people with disabilities. Second, the statement only says "includes accommodations base on research and program outcomes", it doesn't exclude anything else.
- I interpret this to mean "includes" but is not limited to...
- Research and successful program outcomes should be included in the provision for any reasonable modification for access. New technology (i.e. assistive listening devices, voice recognition software) is being developed everyday to allow individuals with disabilities to better receive the benefits of our programs. Also, the Access Board, NCA, and others have provided in depth research as to the most effective dimensions, scoping, and other elements for accessible programs. We should not have to re-invent the wheel.
- BUT...it is not really an option. In other words, does this statement suggest that accommodations do not need to be provided IF they are not based on research and program outcomes?

No, I disagree	%
4	44%

- I don't necessarily agree or disagree but I continue to dislike the language.
- While research and program outcomes can be done and documented by people with disabilities about other people with disabilities, I continue to believe that the statement's tone and message needs to be clearer that people with disabilities must be involved with the development of the programs and services.
- I like the idea that customer feedback is what drives this...also don't use accommodations here either...so I'd replace "research and program outcomes" with "customer opinions and experiences"
- Yes, a best practice is to do research instead of flying by the seat of ones pants. But, given the variation and diversity of people with disabilities the research should acknowledge that what it can identify what works for most people but not all people.

3. A best practice in accessibility includes phasing out adaptations when appropriate.

Yes, I agree	%
4	44%

- Yes, there are some best practices that include phasing out adaptations.
- The beauty of accessibility is that it isn't static. Accommodations/adaptations may indeed be rendered unnecessary as the environment changes, as newer/better/different technologies become available. Thus, a best practice always is to review and re-assess the effectiveness of an adaption/accommodation and to improve it, change it or phase it out.
- Temporary and portable facilities should be replaced with permanent facilities as soon as possible. When it comes to inclusion, I believe, we need to take a much closer look at the consequences before removing additional trained staff or other modifications.

No, I disagree	%
5	56%

- The statement is too ambiguous and allows for interpretations that are clearly not best practices.
- The best practice related to this should include the need to systematically evaluate adaptations that are being provided to ensure that they are still meeting needs.
- ABSOLUTELY DISAGREE...some participants will always need the same modification...why provide it in 2007 and then tell them in 2008 or 2009 that it has been phased out for their own good? Ongoing assessments of the needs of registrants should dictate what is and isn't provided.
- As stated below: I think this needs to be reworded to take a positive approach -- that a best practice means designing universally and including adaptations only when necessary.
- This statement does not mean anything when you add in the words "when appropriate". I think it is meaningless and should be deleted, not because I disagree but because it really does not convey anything.

4. A best practice in accessibility includes full survey of facilities, programs, communication plans, and outreach on at least a five year basis.

Yes, I agree	%
5	56%

- While five years is arbitrary, the intent of continual reassessment of accessibility is important.
- Many of our surveys are found to be incomplete and many of our newly constructed facilities are found to not have met the required access design. Regular periodic surveys are a must because of the many existing structural and non-structural programs, which are not completely evaluated for appropriate accessibility in the planning stage. This may be due to lack of knowledgeable evaluators or lack of total resources.
- I'd replace "full" with "initial comprehensive" and am okay with this.

No, I disagree	%
4	44%

- I agree with the other respondents who disagree. "Five years" seems arbitrary, substituting "as needed" is too vague and too subjective, but the idea is, again, that access isn't static, and that one must review, re-assess and revisit accessibility of facilities and programs and communications plans and that the timeframe is probably best determined on a case-by-case basis.
- Five years is arbitrary.
- For this to be true, it needs a qualifier to state that there is ongoing assessment (if not a full survey). Maintenance of accessible features is an ongoing, day-to-day responsibility.
- I prefer to say "ongoing" rather than 5 years.

5. A best practice in accessibility includes one person designated to have the authority to provide, modify, and assist staff in provision of services and receive complaints.

Yes, I agree	%
5	56%

- Designating a person who would have responsibility for assuring programs and facilities are accessible is a best practice.
- Not sure if it is "the best practice" but it is a common practice and sometimes the envy of agencies that have nothing.
- Although I actually agree with the people who 'disagree' on this one -- I have to say that in reality having at least one person (or one office) is very important. Otherwise it is too easy for things to fall thru the cracks and not get done, or for there to be no clear lines of authority at all to address accessibility.
- EEOC requires that Federal agencies have a "Disability Program Manager" to coordinate reasonable modifications for employees with disabilities. The 504 and ADA regulations provide that public entities have a designated person to focus on access. Only with the proper authority can they be successful.
- Make it one! Committees are great but every one of us has been on a work committee that failed because of diluted authority.

No, I disagree	%
4	44%

- I think that the authority should be dispersed. You need one person as an ADA Coordinator but not only one person with authority to approve.
- This leaves too many loopholes: If the one person has the authority to provide services and receive complaints but has no say in the design of programs, activities, and facilities, or any say over budget, he/she cannot do the job. If it is one person in a multi-faceted organization, how does he/she do it all? What happens when that one person leaves?
- Yes, one person is required to be designated...but the responsibility needs to be shared by ALL.

- I don't understand why "the number of people" needs to be identified, since typically in systemic and sustainable change, many individuals throughout the agency may take on these responsibilities.

6. A best practice in accessibility includes integrating (as appropriate) information about people with disabilities into the content of exhibitions, tours, and public programs.

Yes, I agree	%
7	78%

- Would an exhibit on Mt. Everest be complete without the inclusion of people with disabilities who have reached the summit? Was the FDR Memorial complete without the inclusion of FDR in a wheelchair?
- Yes, could be a best practice but would need to know more about the "how" this is done.
- Yes.
- Including information about individuals with disabilities, such as how many immigrants with disabilities came through Ellis Island, and that there are certain requirements for access, which must be followed, is very important. When signers, assistive listening devices, captioning and other access for effective communication is provided, all participants can learn about access. Universal access (i.e. all tour participants have headsets and receivers and the guide has a transmitter) or allowing those without a qualified disability to use assistive devices to better receive the benefits of the program allows for even a better experience.
- People with disabilities are part of society, history, and everyday life. One of the most important aspects of exhibits is to allow the viewer to see him/herself in the content. People with disabilities should be included positively and appropriately.

No, I disagree	%
2	22%

- This seems a bit like tokenism. Why force or integrate information about disability if it isn't germane to the display? If you mean accessible facilities and assistive listening systems, sure, of course...but that's not the way this reads.
- I'm still not sure what this means.