

# MONTROSE RECREATION DISTRICT ADA EVALUATION



October 2022

Prepared by

**Skulski** Consulting LLC

# MONTROSE RECREATION DISTRICT

## ADA EVALUATION

### TABLE OF CONTENTS

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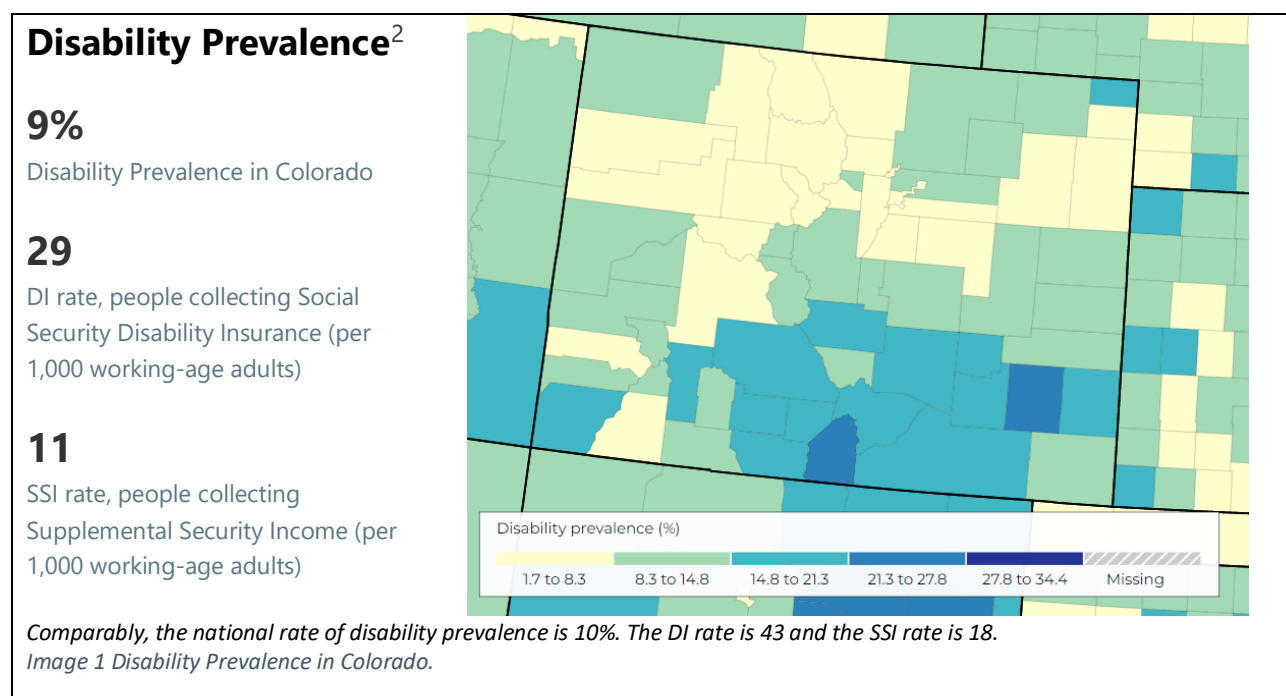
Part 1 – Review of Policies, Practices and Procedures .....	2
Title II Administrative Requirements.....	5
1. Designated Official.....	5
2. Notice.....	8
3. Grievance Procedure.....	10
4. Self-Evaluation.....	11
5. Transition Plan.....	11
6. Participation by People with Disabilities.....	14
Modification of Policies, Practices and Procedures .....	16
7. Rules and Regulations.....	16
8. Requests for Auxiliary Aids and Services.....	20
9. Effective Communication.....	24
10. Employment.....	26
Part 2 – Effective Communication: Information Technology.....	33
Part 3 - Accessibility Assessment .....	41
Key Findings and Recommendations.....	49
1. New Construction and Alterations to Existing Facilities .....	50
2. Doors.....	51
3. Swimming Pools.....	52
4. Sports Fields .....	52
5. Playgrounds.....	53
6. Picnic Facilities: Picnic Tables, Grills, and Trash Receptacles .....	53
7. Scenic Viewing Areas and Benches.....	54
8. Visitor Information, Orientation, and Wayfinding.....	54
9. Trails and Shared Use Paths .....	55
Action Planning .....	56
Resources.....	56
Appendix – Community Focus Groups .....	57
Appendix – Online Community Survey.....	60
Appendix – ADA Action Plan	
Appendix – ADA Transition Plan	
Appendix – Park / Site Accessibility Assessment Conditions Reports	

# PART 1 – REVIEW OF POLICIES, PRACTICES AND PROCEDURES

Inclusively serving people with disabilities has evolved as a central goal for park and recreation agencies since the passage of the Americans with Disabilities Act (ADA) more than 30 years ago. As a best practice, public entities are assessing their programs and exploring opportunities to strengthen their services so that people with disabilities may fully participate and enjoy the same benefits made available to the non-disabled public. This project has been organized to support the public entity, the Montrose Recreation District, through the ADA self-evaluation process whereby an action plan is drafted with specific tasks for improving access for people with disabilities.

The Montrose Recreation District was established as a special district in 1956 to provide recreation facilities, programs, and services. The Recreation District serves the eastern side of Montrose County, roughly 500 square miles that include 14,675 households. The Recreation District boundary has a population over 31,512 while greater Montrose County has an estimated population of 42,758.<sup>1</sup>

National statistics indicate there are 41-61 million people with disabilities in the United States.<sup>3</sup> Since people experiencing functional limitations do not always identify as having a disability, a wide range of data is used to understand the Montrose County population in comparison with national averages. According to the U.S. Census Bureau, approximately 14.5 percent<sup>4</sup> of residents in Montrose County has identified as



<sup>1</sup> U.S. Census Bureau. (2019).

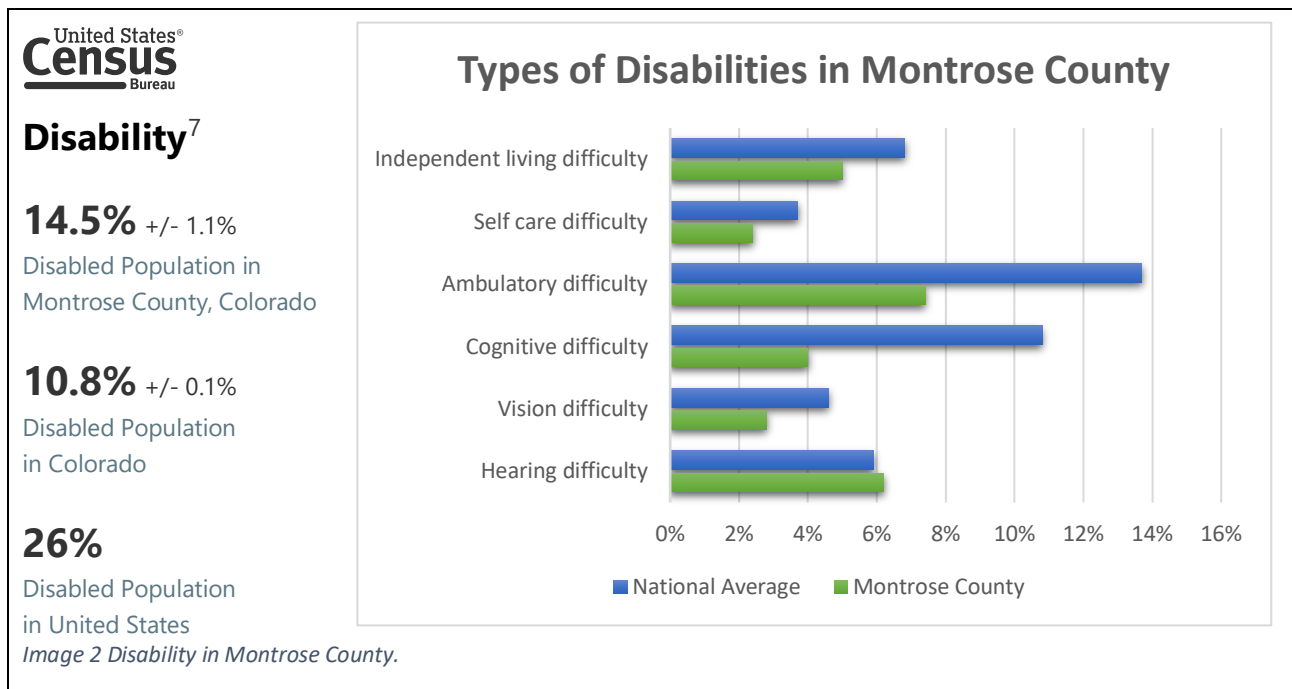
<sup>2</sup> [University of New Hampshire Institute on Disability generated population statistics](#) from the 2018 American Community Survey. SSI and DI program participation statistics come from 2018 data published by the Social Security Administration.

<sup>3</sup> The [U.S. Census Bureau, American Community Survey](#) (ACS) from 2019 indicates there are 41.9 million Americans with disabilities, while the [Centers for Disease Control and Prevention](#) estimate as many as 61 million adults are living with disabilities in the United States.

<sup>4</sup> U.S. Census Bureau, American Community Survey (ACS) 2020 5-year Estimates.

having at least one functional impairment that affects their daily life activity.<sup>5</sup> Montrose is considered as one of the select communities along Colorado’s western slope for families. The American Community Survey estimates that of children under age 18, 5.9 percent of Montrose youth may have at least one functional impairment. Montrose has also grown to become a desirable retirement destination. The same American Community Survey estimates that of adults over age 65, approximately 38.5 percent identify as having at least one functional impairment. Nationally, disability can affect one in every five individuals; and two out of every seven families.<sup>6</sup> Thus, in Montrose County, it is likely that 20-25 percent of the population is affected directly either as an individual with a disability or as a family member of someone with a disability. Of the different types of functional impairments, ambulation is reported as the largest segment both in Montrose County and nationally. The reported population of people with cognitive impairments is significantly less than the reported national average. Local health and human service providers should further analyze this data to determine the cause of this phenomenon.

The Montrose Recreation District has experienced tremendous growth in recent years, expanding programs and opening an 82,000 state-of-the-art recreation center in 2017. The Recreation District also manages a field house with indoor turf soccer field and three parks totaling 65 acres of outdoor recreation space. The Board of Directors and staff have just concluded a whirlwind 12-month community engagement process to develop a master plan for the future. Adopting best practices for fully including people with disabilities has emerged as a priority as the leadership team charts a path forward that may include new programs, new



<sup>5</sup> It is important to note that the U.S. Census Bureau and statistical researchers in disability have long held that the definition of disability is both broadly and narrowly defined based on the context, whether it be as an expansive demographic category or a much more specific criteria for a federal benefit. Accounting for the vast population of people that may have a functional impairment along a spectrum and may not necessarily identify as having a disability per se, the Census Bureau estimates 18 to 20 percent of the population to have a disability in either the communicative, mental or physical domains.

<sup>6</sup> [Disability and American Families: 2000](#). U.S. Census Bureau. (July 2005).

<sup>7</sup> 2020 ACS 5-Year Estimates.

facilities, and prestigious accreditation by the Commission for Accreditation of Park and Recreation Agencies (CAPRA).

To support efforts to comply with the Americans with Disabilities Act and expand inclusive recreation opportunities within the Montrose Recreation District, Skulski Consulting was contracted to conduct an evaluation of policies and accessibility assessment of parks and facilities. A comprehensive review of policies regarding inclusion of people with disabilities and an updated transition plan are also required as part of the process for continuing accreditation through CAPRA. The purpose of this project was to identify areas for accessibility improvements and instances where policies, practices, and procedures may necessitate reasonable modifications to ensure people with disabilities can fully gain access to programs, services, and activities. Recommendations are presented here in order that the Recreation District ensures ADA compliance, expands its accessibility management program, and strives above and beyond the minimum standards toward model best practices to more fully include people with disabilities in all facets of community life.

## METHODOLOGY

For the purposes of this ADA evaluation, data was collected through various methods that would paint a comprehensive landscape of the Montrose Recreation District's ADA compliance. More than 30 policies were reviewed and 12 hours of interviews were conducted across all departments to capture a current snapshot of how people with disabilities are served in Recreation District programs, services and activities. The staff interviews identified instances where modifications have been made to procedures and how auxiliary aids and services are utilized to facilitate participation for people with disabilities. The staff interviews also included discussion of areas where ADA compliance challenges exist and opportunities to strengthen service delivery to better meet the needs of residents and visitors with disabilities.

## HOW TO USE THIS REPORT

The following sections of this report present the findings from the ADA evaluation of policies, procedures, programs, services, and activities offered by the Montrose Recreation District. Proposed action items are presented as either REQUIRED or RECOMMENDED as defined:

*REQUIRED: The action is essential and necessary to achieve minimum compliance with the Americans with Disabilities Act.*

*RECOMMENDED: The action is recognized as a best practice, above and beyond the minimum ADA standards and regulations, to create a community more inclusive of people with disabilities.*

This report is designed to give the District's accessibility management team the information and tools necessary to implement an ADA Action Plan that can serve as a dynamic working document to guide future planning and program delivery to more fully include people with disabilities who live, work and play in Montrose.



# TITLE II ADMINISTRATIVE REQUIREMENTS

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The ADA Title II regulations require units of state and local government, depending on size, take certain administrative measures to implement the regulations and make the information available to constituents with disabilities.

## Title II Administrative Requirements



Designate a responsible employee

(Entities w/50+ employees)



Notice to the public

(All public entities)



Grievance procedure

(Entities w/50+ employees)



Self-Evaluation

(All public entities)



Transition Plan

(Entities w/50+ employees)

This section serves to provide an update on the administrative requirements completed by the Montrose Recreation District while also outlining follow-up tasks to create greater access for people with disabilities, above and beyond the minimum regulations set forth in the ADA (*28 CFR Part 35 Nondiscrimination on the Basis of Disability in State and Local Government Services*).

### 1. DESIGNATED OFFICIAL

Title II, § 35.107(a) Designation of Responsible Employee (DRE), requires a public entity to appoint an employee to coordinate and carry out the District's compliance efforts, including investigation of complaints. Further the contact information for the designated official is required to be made available through the public notice. The ADA regulations do not require an "ADA Coordinator" per se. Instead, the appointment of an ADA Coordinator is viewed as a best practice to orchestrate day-to-day compliance activities. The DRE and ADA Coordinator responsibilities, most often, are separate roles respectively lying with the chief executive and a director/manager.

While the ADA does not require a formal compliance team, the team approach can be incredibly effective to ensure compliance across departments. This team approach can drive disability policy and inclusive organizational practices. An effective accessibility management team includes representation of key functions within the public entity.

Informally, the Executive Director of the Montrose Recreation District has assumed the role of the DRE and the Recreation Manager has taken on ADA coordination for day-to-day operations. District leadership has convened a team to discuss ADA issues. As this process continues, the team should be able to take on a formal role and specific charge.

**Required:** Formally appoint the Designated Responsible Employee with the final decision-making authority for ADA compliance, and, as a best practice, an ADA Coordinator for daily operations. Distinguish the DRE role from that of the ADA Coordinator.

**Required:** Publicize the contact information for the ADA Coordinator through the web site, all ADA Notices to the public, and other communication vehicles.

**Recommended:** Formally designate members of an accessibility management team. The further development of the accessibility management/compliance team is recommended to facilitate the flow of ADA compliance information, direct policy, and prioritize corrective actions while maintaining a consistent level of expectation among residents with disabilities. The accessibility management/compliance team should provide a structure for determining the appropriateness of reasonable modifications of policies, practices, and procedures, or other instances that may pose a direct threat, fundamental alteration to the nature of the program, or undue burden to the entity. At a minimum, the accessibility management/compliance team should include representation from Programs, Customer Service, Facility Operations, Risk Management, Marketing/Communications, and Human Resources.

**Recommended:** Support continuing education for the ADA Coordinator and members of the accessibility management team. It is recommended that the ADA Coordinator complete the [ADA Coordinator Training Certification Program](#) offered through the Great Plains ADA Center and supported through the educational offerings of the National Network of ADA Centers and the [National ADA Symposium](#).

# ADA Compliance / Accessibility Management Team

## Designated Responsible Employee / Executive Director

- Authorized with final decision-making authority

## ADA Coordinator

- Manage daily ADA compliance

## Engineering / Planning / Design

- Prioritize and implement accessibility improvements identified in ADA Transition Plan

## Operations / Public Works

- Make ADA improvements through routine maintenance. Ensure daily facility access

## Programs / Services

- Provide reasonable modifications, auxiliary aids and services in the most integrated setting.

## Marketing / Communications

- Ensure effective communication for all programs, services and activities

## Purchasing

- Ensure new products, services and contracts include ADA compliance.

## Information Technology

- Ensure new technologies for the public, employees and volunteers are accessible

## Human Resources

- Facilitate reasonable accommodations for applicants, employees and volunteers

## Finance

- Support creative approaches to steward accessibility improvements

## Risk Management

- Assess safety concerns related to ADA compliance

## Legal

- Engage proficient resources to support good faith efforts for ADA compliance

*\*Representation on the accessibility management team is recommended, but not limited, to these roles.*



## 2. NOTICE

Title II, § 35.106 Notice, requires public entities to make available a public notice to applicants, participants, beneficiaries, and other interested parties the applicability of the ADA provisions and to apprise them of the protections afforded to them under the federal law. The manner by which the information is made available is left to the discretion of the head of the agency. The U.S. Department of Justice interprets the ADA Notice requirement as an ongoing responsibility of the public entity and recommends ADA Notice placement in job applications; periodically in local newspapers; public service announcements on local radio and television stations; published on the government entity's website; posted at all facilities, included in program handbooks and activity schedules; announcements for meetings of programs, services, and activities; published as a legal notice in local newspapers; and posted in bus shelters or other public transit stops.

At this time, the District does not have an ADA Notice. It does, however, have an inclusion statement in the guidebook and a website accessibility statement published online. The inclusion statement reads:

*The Montrose Recreation District is committed to making all of our programs and leisure services in compliance with the Americans with Disabilities Act of 1992. If you have a need for an ADA modification, please notify our staff at the time of registration. For comments or concerns, please call Jeremy Master, Recreation Manager, at 970-249-7705.*

A welcome statement encouraging participation by people with disabilities is considered a best practice by which the public entity can further communicate its commitment to inclusion. The website accessibility statement is not required under the ADA, but is considered a best practice indicating the public entity's intent to provide an accessible website and contact information for inquiries.

The ADA Notice and obligation of the District's responsibilities to comply with Title II should not be confused with the welcome statement, website accessibility statement, or other information directing an individual on the process to request a reasonable modification, alternate format, auxiliary aid or service for participation. Placing the welcome statement upfront to the ADA Notice and throughout other publications encourages people with and without disabilities to take a deeper interest in the District's intent to comply with the ADA.

**Required:** Adopt an ADA Notice and publish to the MRD's website along with periodic placement in the seasonal program guidebook.

**Recommended:** Consider developing the ADA Notice to follow the template recommended by the U.S. Department of Justice in the [ADA Best Practices Tool Kit for State and Local Governments](#) as modified in the example at the end of this section.

**Recommended:** Promote the web page with the ADA Notice so it can easily be found and navigated to from the MRD's main web page. Consider combining the website accessibility page and the ADA compliance program page into a single page accessed from the main web site landing page. It would also be considered acceptable to move the ADA Notice to an umbrella non-discrimination web page.

**Recommended:** Develop a schedule to broaden the outreach of the District's ADA Notice such as through major District publications, public service announcements, and as a legal notice in the local newspaper.

**Recommended:** Design a poster that can be used as a public notice on display at all MRD facilities and locations of MRD programs, services and activities.

**Recommended:** Consider adding a welcome statement to preface the MRD's ADA Notice on the web page.

## **Proposed ADA Notice – Montrose Recreation District**

*The following statement is modified from the DOJ Tool Kit and proposed for use by MRD.*

The Montrose Recreation District is committed to making all of our programs and leisure services fully inclusive of individuals with disabilities. If you have a disability-related need for a modification, auxiliary aid, or service, in order to participate in a program, please notify our staff at the time of registration. For comments or concerns on MRD policies or the accessibility of facilities, please call the MRD ADA Coordinator and Recreation Manager, Jeremy Master at (970) 249-7705.

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the Montrose Recreation District will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

**ADA Self-Evaluation and Transition Plan:** With the assistance of an independent consultant, the Montrose Recreation District has conducted an accessibility assessment of all parks and facilities, along with an evaluation of policies, practices, and procedures. As a result, a dynamic, working Transition Plan has been developed to make physical accessibility improvements at parks and facilities. Further, an ADA Action Plan is utilized by our Accessibility Management Team to implement policies, practices, and procedures that are more fully inclusive of people with disabilities. Inquiries on the ADA Transition Plan and ADA Action Plan can be directed to the ADA Coordinator.

**Public Input:** The Montrose Recreation District hosts a variety of public events throughout the year to gather input from the community. People with disabilities, family members, and disability advocates are invited and encouraged to participate in community engagement sessions, public meetings, focus groups, surveys, and other special events. Individuals interested in MRD inclusion initiatives are also invited to subscribe to our newsletter. Public comments specific to accessibility of parks, facilities, and programs can be directed to the ADA Coordinator at any time.

**Modifications to Policies and Procedures:** The Montrose Recreation District will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in MRD offices, even where pets are generally prohibited.

**Employment:** The Montrose Recreation District does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

**Effective Communication:** The Montrose Recreation District will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in MRD programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

**Requesting Assistance:** Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity, should indicate so at the time of registration or contact the office of the ADA Coordinator and Recreation Manager, Jeremy Master at (970) 249-7705 as soon as possible but no later than 72 hours before the scheduled event.

The Montrose Recreation District will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

The ADA does not require the Montrose Recreation District to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

ADA and Disability-Related Complaints: Inquiries or complaints that a program, service, or activity of the Montrose Recreation District is not accessible to persons with disabilities should be directed to the ADA Coordinator and Recreation Manager, Jeremy Master at (970) 249-7705.

### 3. GRIEVANCE PROCEDURE

Title II, § 35.107(b) Complaint Procedure, requires a public entity to adopt and publish grievance procedures providing for prompt and equitable resolution of ADA-related complaints. The purpose of the ADA grievance procedure is to provide people with disabilities an informal process to contact an entity regarding an access issue so that the individual and the public entity may work together toward a mutual and timely resolution.

The MRD leadership team takes pride in its ability to respond and implement solutions based on public inquiries. Members of the public are encouraged to provide feedback through the District program guide, web site, suggestion box at facilities, and HappiFeet Montrose app by available by PROS Consulting during the master planning process. Public inquiries have sparked actions such as the installation of a doorbell at the lifeguard station for patrons that have difficulty opening the heavy doors to the pool; acquisition of a slide board for transfer to the aquatic chair from a wheelchair; and additional signed accessible parking spaces at the CRC. While these are open-ended opportunities for the public to make inquiries or complaints, the District does not currently have a published formal grievance procedure either for ADA-specific complaints or general issues.

**Required:** Adopt a grievance procedure to receive, investigate, and follow-up on ADA-related complaints and make the procedure known to the public.

**Recommended:** Establish a system for the ADA Coordinator to intake, update, monitor, track, and report all ADA-related inquiries and complaints. This will enable staff to pinpoint specific facility access issues that may need to be reconsidered when prioritizing the ADA Transition Plan; policy issues that may need further modification; and corrective actions should the complaint proceed as a formal complaint to DOJ or private right of action in federal court.

**Recommended:** Continue to encourage and promote informal processes for inquiries whereby individuals with concerns can contact staff directly to talk through the issue, staff can make inquiries with specific departments and then follow up with individuals with a win-win resolution. Consider adding information to the ADA grievance procedure encouraging open communication with constituents:

*Many disability-related concerns can be resolved internally without resorting to lengthy and costly grievance procedures. Before filing your complaint, contact the District's ADA Coordinator to discuss your concerns. The ADA Coordinator can look into the issue and try to come up with an acceptable resolution to the situation.*

**Recommended:** Establish a timeline for the grievance procedure with input from people with disabilities or an organizational disability advisory committee/board as to their expectations for a timely response to complainants with disabilities. The following timeline is considered a best practice that could be adopted.

- The complaint should be submitted by the complainant(s) and/or his/her/their designee as soon as possible—but no later than 60 calendar days—after the alleged violation to the ADA Coordinator.
- Within 10 calendar days after receipt of the complaint, the ADA Coordinator or their designee will meet with the complainant to discuss the complaint and the possible resolutions.
- Within 10 calendar days of the meeting, the ADA Coordinator or their designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the District and offer options for substantive resolution of the complaint.
- If the response by the ADA Coordinator or their designee does not satisfactorily resolve the issue, the complainant and/or their designee may appeal the decision within 10 calendar days after receipt of the response to the Executive Director or their designee.
- Within 10 calendar days after receipt of the appeal, the Executive Director or their designee will meet with the complainant to discuss the complaint and possible resolutions.
- Within 10 calendar days after the meeting, the Executive Director or their designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.
- All written complaints received by the ADA Coordinator or their designee, appeals to the Executive Director or their designee, and responses from these two offices will be retained by the District for at least three years.

## 4. SELF-EVALUATION

Title II, 35.105 Self-Evaluation, requires a public entity to evaluate its current services, policies, and practices to the extent modification of any such services, policies, and practices are necessary to enable participation by people with disabilities. As MRD has experienced tremendous growth since the passage of the ADA, this process is to serve as the District’s most current self-evaluation and action plan.

**Recommended:** A successful public entity is attentive, flexible, and responsive to the ever-changing needs of the community it serves. As such, District policies, programs, and services will continue to evolve. Recognizing the fluidity of the enterprise, it is recommended that the expertise of the District ADA Coordinator be utilized to continually self-evaluate programs, services, policies, and procedures; and work with departments to make reasonable modifications to ensure people with disabilities have the equal opportunity to participate and enjoy the benefit of MRD programs, services and activities.

**Recommended:** Utilize the coordination of an accessibility management team to implement an ADA Action Plan that specifies tasks, leads and timelines.

**Recommended:** Communicate the MRD ADA compliance initiatives through annual updates, staff training and new employee orientation.

## 5. TRANSITION PLAN

Title II, § 35.150(d) Transition Plan, requires a public entity to develop a transition plan if structural changes to facilities are necessary in order to achieve program accessibility. It is not out of the ordinary for a Title II entity to have an existing ADA Transition Plan that does not fully address parks and recreation facilities as

the original accessibility standards did not address these types of environments. In 2010, DOJ issued revised accessibility standards that, for the first time in standards history, outlined scoping and technical provisions for recreation facilities including swimming pools, golf course, playgrounds, boating facilities, fishing areas, and sports fields. In 2013, the U.S. Access Board issued accessibility standards for outdoor developed areas including trails, scenic viewing areas, beaches, campgrounds, and picnic areas at federal facilities covered under the Architectural Barriers Act (ABA). While these accessibility standards only apply to federally owned and funded projects, they serve as guidance to Title II entities. With the release of both the 2010 ADA Standards for Accessible Design and the 2013 addition of outdoor developed areas to the ABA, it has become necessary and prudent for all Title II public entities that provide outdoor recreation spaces and facilities to reassess barrier removal and accessibility improvements consistent with the new standards, thereby folding that data into an ADA Transition Plan. This process is to serve as the MRD's working ADA Transition Plan.

## 5.1 Program Access

Title II, § 35.149 states that *no qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.* This is known as the "program access" standard in Title II. Program access is the foundational principle for Title II of the ADA. When viewed in its entirety, programs, services and activities must be accessible to people with disabilities. The Title II "program access" standard does not require that ALL **existing facilities** are accessible. Instead, it requires that ALL **programs, services and activities** are accessible. At sites where programs, services and activities are offered but that currently are not physically accessible, the public entity is tasked with either 1) making the physical environment accessible to facilitate participation in the program, service or activity; OR 2) relocating the program, service or activity to an accessible location until such time that the existing inaccessible site is made accessible.

**Recommended:** Prioritize and schedule corrective actions that are necessary to achieve PROGRAM ACCESS. These are corrective actions that can ensure people with disabilities have the equal opportunity to participate in and benefit from the activities and experiences associated with the program, service or activity offered by MRD, whether it be structured and staffed or non-structured and self-guided.

## 5.2 Prioritizing, Scheduling, and Updating Accessibility Improvements

Informally, the District has addressed accessibility improvements as a component of scheduled alterations, renovations, or capital projects. The completion of the accessibility assessment now gives MRD the essential data to prioritize accessibility improvements through a dynamic, working ADA Transition Plan. As projects are scheduled, decision-makers should have a thorough understanding of visitor use patterns, including primary and secondary experiences, length of time at a site, volume of use and frequency of use. This data will help to guide prioritization of accessibility improvements.

**Recommended:** Designate lead staff to drive the prioritization and scheduling of accessibility improvements, coordinating ADA compliance for the physical environment at MRD facilities and parks.

**Recommended:** Convene the responsible units for transition planning semi-annually to report progress on accessibility improvements along with updates on upcoming projects.

**Recommended:** Develop a process to track and report on completed accessibility improvements. This process should also include tracking actions in lieu of barrier removal necessary to achieve program access.

### 5.3 Planning, Design, and Inspection

MRD is moving into a new chapter of accelerated growth, noted by the construction of a new community recreation center, refurbishment of Holly Park, and development of a comprehensive master plan. This new chapter will likely include the acquisition of new park land and design of new facilities to support community needs for recreation programs and spaces. As plans are made to refurbish existing sites and develop new sites, access for people with disabilities should be an essential component of all projects.

**Recommended:** Provide training on the accessibility standards for the accessibility management team and staff with responsibility that oversee and implement accessibility improvements.

**Recommended:** Develop a process to draw on the expertise of staff with knowledge of the building codes, accessibility standards, universal design, and inclusion of people with disabilities in the conceptual planning phase, drawing review, mid-point and final project inspections.

**Recommended:** Adopt a process by which construction drawings are reviewed at 50-60% and 90-95% completion for compliance with the accessibility standards.

**Recommended:** Adopt a process by which repairs, alterations, renovations, and new construction projects are inspected for compliance with the accessibility standards prior to receiving ownership of the final completed project/building/site. During this process, an element found out of compliance with the accessibility standards should be corrected at the expense of the contractor.

**Recommended:** Utilize the ADA Coordinator on specific projects and planning teams to research the latest technology advancements and design innovations to ensure the needs of people with disabilities from the onset of the project planning process.

### 5.4 Maintenance of Accessible Features

Title II, § 35.133 Maintenance of Accessible Features requires a public entity to maintain in operable working condition those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities. The operations and facility management staff are instrumental to the maintenance of accessible features and equipment.

**Recommended:** Provide training on the 2010 ADA Standards for Accessible Design to facility and operations staff responsible for maintaining parks and facilities. Foundational knowledge of the accessibility standards will enable staff to more efficiently perform routine maintenance in compliance with the standards.

**Recommended:** Adopt a process whereby daily/weekly/monthly/seasonal inspections ensure that accessible features of facilities and equipment are fully functional and independently usable by people with disabilities.

**Recommended:** Utilize input from a disability advisory committee and disability service providers on the selection of furnishings for public use.



## 6. PARTICIPATION BY PEOPLE WITH DISABILITIES

Title II, § 35.105(b) Self-Evaluation and § 35.150(d) Transition Plan of the ADA requires a public entity provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process and the development of the transition plan by submitting comments.

### 6.1 Public Input

MRD has recently undergone more than 12 months of master planning with strategic community engagement initiatives including in-person meetings and surveys. This master planning process generated a wealth of input from residents. Through the ADA evaluation process, two focus groups more specific to accessibility and inclusion of people with disabilities were conducted in July 2022 and a voluntary online survey was administered in August 2022 for those that could not attend the in-person focus groups (See *Appendix-Online Community Survey*).

**Recommendation:** Continue to provide opportunities for public input specific to accessibility issues in parks, facilities, and programs with local disability advocacy organizations, individuals with disabilities, and a proposed disability advisory committee.

**Recommendation:** Utilize events such as the anniversary of the ADA to update residents and disability advocacy organizations on the efforts MRD has made to achieve compliance with the ADA and provide inclusion supports to facilitate participation in MRD programs, services and activities.

**Recommendation:** Consider developing a publication such as a brochure or e-newsletter to inform residents on the accessibility of MRD facilities and the availability of disability-related accommodations in MRD programs, services and activities.

### 6.2 Boards, Committees, and Work Groups

The Montrose Recreation District is governed by a 7-member board of directors. Representatives are elected at large for 3-4 year terms. While the board does not have specific representation of people with disabilities, one current board member is a special education teacher with a background and professional expertise on the needs of the local disability community. MRD has advisory committees and community work groups most often associated with long range tasks. The District does not have an advisory committee for disability/accessibility issues. Staff interviews and community engagement sessions suggested that while there is no known disability network or advisory group coordinated at the local level, MRD might be the ideal candidate to bring service providers together to share information and facilitate collaboration.

**Recommended:** Ensure representation of people with disabilities on various boards and committees guiding MRD priorities. As commissions, advisory teams, and work groups meet on specific topics, it is important to ensure that accessibility and disability-related issues are addressed in the earliest stages of planning. Representation of people with disabilities should be balanced, first, because the person has an interest in the overall topical area or project; and second, because the person also has expertise with the disability issues, ADA regulations and standards. If the individual does not have a working knowledge of the ADA, membership should be cultivated to ensure that knowledge is represented in the planning process and as part of the whole of the group.

**Recommended:** Actively engage with local disability advocacy organizations and individuals with disabilities to develop relationships and recruitment channels to communicate open leadership positions.

**Recommended:** Consider convening a disability advisory committee to advance District policies that are welcoming and inclusive of people with disabilities. Seek input from this committee regarding the development and implementation of an ADA Transition Plan specific to parks and recreation. Encourage staff to seek input from the advisory committee while planning new parks, recreation facilities and programs.

**Recommended:** Consider organizing the development of a community network of disability advocates and service providers to maximize resources.

# MODIFICATION OF POLICIES, PRACTICES AND PROCEDURES

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Title II, § 35.130(b)(7), requires a public entity to make reasonable modifications to policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity. When an individual with a disability encounters barriers to programs and the environment it not only affects the individual, it affects the group, the family and friends who are also seeking to participate with the individual. Therefore, initiatives should be purposeful to meet the needs of individuals along a spectrum of functional limitations as well as facilitate a positive experience for the entire group, for people with disabilities and people without disabilities. The following findings and recommendations are based on a broad review of the enterprise and those policies, practices and procedures that most immediately impact participation by people with disabilities in District programs, parks, and facilities.

## 7. RULES AND REGULATIONS

The Montrose Recreation District does not issue its own set of park or facility governing regulations, instead it refers to ordinances issued by the City of Montrose, County of Montrose, and State of Colorado. As such, a broad review of City ordinances was conducted to identify areas where policy may unintentionally pose a barrier to participation for people with disabilities. City ordinances could have the most immediate impact on programs, services, parks, and facilities offered through the Montrose Recreation District. This review found the City ordinance on “animal control” to be inconsistent with the ADA regulations.

MRD may also post informal rules or policies specific to a program or recreation space. Approximately 33 District policies were reviewed for this evaluation. The need for reasonable modifications to policies will be further discussed here and in the corresponding sections of this report.

**Recommended:** Develop a practice to consult with the ADA Coordinator on additions or revisions to District policies to ensure the language is consistent with the federal ADA regulations.

### 7.1 Service Animals

Informally, the District allows service animals in recreation facilities and programs. The Community Recreation Center (CRC) Patron Code of Conduct reads that “Pets and animals are not allowed at the CRC, except for certified service animals.” The ADA regulations do not require service animals to be certified or licensed. The pool rules at the CRC and Field House also make the exception that “No animals are allowed on the pool deck except service animals.” There are no posted signs at District parks requiring dogs to be on leash or stating exceptions for service animals.

The City of Montrose ordinance on “animal control” prohibits animals at sports fields and playgrounds owned or maintained by the City. This ordinance poses a conflict with the ADA regulations as it does not include an exception for service animals or clarification for non-City properties. The ordinance reads:

*Sec. 6-2-5. - Animals prohibited. It shall be unlawful for the owner or custodian of any animal to possess or allow that animal on the premises of cemeteries, sports fields, and non-grass playgrounds owned and maintained by the City, or for the owner or custodian to possess or allow any animal within the premises of any special event hosted within the City where posted any animal is not permitted, unless specifically authorized by the City Manager or his designee. (Ord. No. 2477, § 6-2-5, 5-21-2019)*

**Required:** Work with the City of Montrose officials to revise the local ordinance Chapter 6.2 Animal Control Regulations to include a definition of service animals and an exception for the use of service animals under the handler’s control consistent with the ADA regulations.

**Required:** Adopt a policy to allow service animals in parks and recreation facilities and publish the policy for public reference. A proposed policy is included at the end of this section.

**Recommended:** In the CRC Patron Code of Conduct, remove the “certified” terminology in reference to service animals.

**Recommended:** Provide training to new employees on the ADA requirements for service animals.

### **Sample Service Animal Policy**

The Montrose Recreation District welcomes people with disabilities using service animals at all of our parks and facilities. We recognize that individuals with disabilities rely on their service animals to independently access the community including our parks and recreation programs.

The MRD policy defines a service animal as a dog that has been individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. The tasks performed by the service animal must be directly related to the person’s disability. Staff may ask (1) if the dog is a service animal required because of a disability, and (2) what work or task has the dog been trained to perform. Staff will not ask about the person’s disability or request medical documentation, a special identification card, or training documentation for the dog. The service animal must be under the control of its handler. The service animals must be harnessed, leashed, or tethered, unless the individual’s disability prevents using these devices or these devices interfere with the service animal’s safe, effective performance of tasks. If the dog is out of control and the handler does not take effective action to control it or if the dog is not housebroken, staff may ask that the service animal be removed from the premises. When there is a legitimate reason to ask that a service animal be removed, staff will offer the person with the disability the opportunity to participate in the program without the animal’s presence. Staff will not provide care or supervision of a service animal.

Service animals are not pets. For many individuals with disabilities, separation from a service animal has the same effect as having a wheelchair or communication device taken away. This policy does not extend to emotional support, therapy, comfort, or companion animals. While these animals may provide a calming effect, they do not qualify as service animals because they have not been trained to perform a specific job or task.

Inquiries or complaints that a program, service, or activity of the Montrose Recreation District is not accessible to persons with disabilities should be directed to the ADA Coordinator and Recreation Manager, Jeremy Master at (970) 249-7705.

## 7.2 Other Power-Driven Mobility Devices

The DOJ revised 2010 ADA regulations require people with disabilities using other power-driven mobility devices (OPDMD) be allowed in the same areas open for pedestrian use unless the public entity can demonstrate that the class of other power-driven mobility devices cannot be operated in accordance with legitimate safety requirements that the public entity has adopted pursuant to §35.130(h). The DOJ regulations state that the public entity shall consider the assessment factors such as the type and size of the device; the facility's volume of pedestrian traffic, characteristics and design; safety requirements that may need to be established; and whether the use of the other power-driven mobility device creates a substantial risk of serious harm to the immediate environment or natural or cultural resources.

The District does not have a specific policy on the use of other power-driven mobility devices at recreation facilities, athletic fields, park trails, or shared use paths. The Uncompahgre Riverway Trail is a shared use path for pedestrians and bicyclists that runs along the western boundaries of McNeil Fields and Ute Park. This section of the path is part of the City's master plan for the riverway. There is no posted sign for rules and regulations governing the shared use path on the section bordering the properties managed by the Montrose Recreation District. The lack of published policy on the shared use path can lead to confusion when users begin driving faster moving vehicles on the multi-user trail like golf carts, electric vehicles, and e-bikes.

**Required:** Adopt a policy on the use of other power-driven mobility devices at MRD parks and facilities with input from a disability advisory committee.

**Recommended:** Work with the governing entities for the Uncompahgre Riverway Trail to post regulatory signage at the trailheads at McNeil Fields and Ute Park.

### Sample OPDMD Policy

The Montrose Recreation District welcomes individuals with mobility disabilities to use wheelchairs and manually powered mobility aids, such as walkers, crutches, canes, braces, or other similar devices designed for use by individuals with mobility disabilities in any areas open to pedestrian use. As a reasonable modification of policies, practices, or procedures under the ADA, the use of other power-driven mobility devices (OPDMDs) by qualified individuals with mobility disabilities shall be permitted, unless the class of other power-driven mobility devices cannot be operated in accordance with legitimate safety requirements adopted by the Montrose Recreation District. Indoor use of fuel-driven engines that produce fumes will not be permitted. Use of OPDMDs will be assessed on a case-by-case basis with consideration of the following factors:

1. The type, size, weight, dimensions, and speed of the device;
2. The volume of pedestrian traffic (which may vary at different times of the day, week, month, or year);
3. The facility's design and operational characteristics;
4. Whether legitimate safety requirements can be established to permit the safe operation of the OPDMD; and
5. Whether the use of the OPDMD creates a substantial risk of serious harm to the environment or natural or cultural resources, or poses a conflict with federal land management laws and regulations.

On occasion, during the assessment process, it may be necessary for staff to ask a person using an OPDMD for a “credible assurance” that the device is required because of a mobility disability. A valid, disability parking placard or card, or other State-issued proof of disability is a credible assurance. The individual’s word that he/she uses the OPDMD due to a mobility disability is also a credible assurance, as long as it’s not contradicted by observable fact. Staff will not ask about the nature and/or extent of the individual’s disability.

It should be noted that this policy may be modified over time to include set speed and other limits at specific parks, facilities, and other properties managed by the Montrose Recreation District.

Inquiries or complaints that a program, service, or activity of the Montrose Recreation District is not accessible to persons with disabilities should be directed to the ADA Coordinator and Recreation Manager, Jeremy Master at (970) 249-7705.



## 8. REQUESTS FOR AUXILIARY AIDS AND SERVICES

Title II, § 35.160(b)(1), requires a public entity to furnish appropriate auxiliary aids and services where necessary to afford qualified individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity of a public entity. The Montrose Recreation District provides programs ranging from youth sports, aquatics, and fitness classes to after school youth enrichment and day excursions for older adults. These programs are offered seasonally and require advance registration. MRD also offers open programs and activities that do not require advance registrations or reservations. The public can simply show up to activities like open swimming, open gym use, Saturday night dances, crafting groups, and jam sessions/sing alongs.

### 8.1 Welcome Statement

The District publishes an inclusion statement within the first four pages of the seasonal guidebook. As previously discussed, the administrative requirement for a public notice should have much more detail on the public entity's intent to comply with the ADA. On the contrary, a welcome statement or inclusion statement is far less formal and far more inviting. This shorter statement inviting people with disabilities to participate in recreation programs and make requests for disability-related supports has become a recognized best practice in park and recreation administration. However, the challenge with a welcome statement or inclusion statement is getting it to resonate with the intended audience. While the District inclusion statement is a good starting point to communicate the availability of ADA accommodations, the statement may not necessarily connect immediately with groups less versed in the ADA or a public entity's responsibility to provide auxiliary aids and services. People newly experiencing disability may have limited knowledge of the ADA provisions and the options to make a request of a public entity; while parents of children with disabilities may only have familiarity with the special education process through the school district, which is very different from the ADA process. If a person has never asked for a disability-related accommodation before, they may not be aware that the request is within their rights under the ADA. Alternatively, if a person with a disability or a parent of a child with a disability has been frustrated by the process associated with other service providers, they may be too weary of making the request to a new organization. Community recreation providers are poised to create greater awareness of accessible recreation options by building upon a welcome or inclusion statement with more explanation on the types of auxiliary aids and services that are available and could support individual participation in various programs.

**Recommended:** Consistently utilize the inclusion statement to invite participation by people with disabilities in marketing materials for programs, services, and activities including the seasonal guidebook, program brochures, the District web site, social media, and other communication vehicles. Example: *People with disabilities are welcome to participate in all programs. Requests for disability-related services can be made during registration or by calling (555) XXX-XXXX at least two weeks prior to the start of the program.*

**Recommended:** Grow awareness of accessible recreation opportunities and the process to make disability-related requests for auxiliary aids and services. Awareness efforts could include leisure education on the benefits of recreation for people with disabilities with health care providers, social service agencies, schools, neighborhood groups, and disability advocacy organizations.

### 8.2 Program Information and Eligibility Criteria

Title II, § 35.130(b)(8), states a public entity shall not impose or apply eligibility criteria that screen out or tend to screen out an individual with a disability or any class of individuals with disabilities from fully and

equally enjoying any service, program, or activity, unless such criteria can be shown to be necessary for the provision of the service, program, or activity being offered. The eligibility criteria for youth programs are based on age and timely registration. Some classes, like swim lessons, are designed using the proficiency in a learned skill set as the eligibility criteria to advance to the next level. As programs are designed and marketed, it is important that any requisite skill or other eligibility criteria is clearly stated in the program description.

During this evaluation, staff expressed concerns about the physical efforts necessary for some excursions offered in the 50+ programs. The excursions were mostly related to trail hikes that might span four or more miles and a change in elevation of 1,000 ft or more. Most of these types of programmed trail hikes were “rated” as “moderate” hikes. It is worth noting that the U.S. does not have a uniform system for classifying or categorizing hiking trails as easy, moderate, or difficult. Trail ratings systems have evolved from organizations like the Sierra Club, USDA Forest Service, and AllTrails crowd-sourced mobile app. But no single system has emerged as the standard adopted and implemented by the majority of trail management agencies. Thus, a trail could be categorized as either easy, moderate, or difficult depending on the system used to rate it.

The program description plays a critical role in attracting prospective participants and enabling people to make informed choices as to whether the program is appropriate for their individual ability. The program description should include characteristics of the environment should those characteristics pose barriers to participation. In the example of the trail excursions, the program descriptions include both the subjective “easy, moderate, or difficult” trail rating along with objective information like the total distance for the hike and the expected change in elevation. Similarly, the program description for an excursion to a historic home may indicate that the second floor is not accessible, but that images or real-time video of the layout and artifacts will be made available during the tour. When planning a new season of programs, the variety of programs offered to the public at large should balance the intended user experience, desired outcomes, and prospective participant needs. That doesn’t mean a recreation agency should only offer “easy” trail hikes. It’s to say that if a moderate or difficult trail hike is offered, program designers should examine the intended user experience and outcomes to determine if a similar program could be offered as a more accessible and inclusive experience for people with disabilities alongside participants without disabilities.

**Recommended:** Utilize an internal program committee to review proposed eligibility criteria, ensuring requisite skill sets are accurately defined without screening out prospective participants based on assumed functional limitations.

**Recommended:** Adopt a process to select program locations that can offer an accessible experience when viewed in its entirety. Should a site be selected based on distinguishing features that are integral to the intended program experience, ensure the program description reflects the characteristics of the physical environment so a prospective participant can make an informed choice as to whether the program is appropriate for their individual ability.

### 8.3 Open Programs and Advance Registration Programs

Advance registration for programs, services, and activities gives staff lead time to plan for auxiliary aids and services that may be requested to accommodate a disability-related need. MRD program registrations are centrally coordinated online by customer service staff using the Vermont Systems RecTrac platform. Once a program is selected and the user is ready to checkout, the online cue makes the inquiry:

“Does your child have any special needs or requests?”

The ADA prohibits unnecessary disability inquiry. It is not permissible to ask an individual if they have a disability. The phrasing of this question may solicit an individual to disclose private information about their disability or diagnosis. Great care must be taken to protect the privacy of the individual while gathering information to support the provision of an auxiliary aid or service. Any inquiry should be specific to the type of accommodation the individual needs, not the nature of the disability or diagnosis. **The online registration question should be rephrased to say, “Do you require a disability-related accommodation?”** Best practices suggest this question is more effective using a framework of options to choose from various auxiliary aids and services. For some people with disabilities and parents of children with disabilities, this may be the first time that they make a request for a disability-related accommodation. The list of options gives prospective participants a better understanding of the types of aids and services they can request.

Once the special need is indicated on the registration, the information is forwarded to the program coordinator. Then the program coordinator may contact the participant and make program adjustments as needed. Disability-related modifications, auxiliary aids, and services are decentralized and provided through the individual program coordinator. Through this evaluation, program staff described the limited number of disability-related requests they have received. Relative to the number of programs offered, MRD has had less than 20 instances of disability-related requests in the last three years. These instances are only offered as anecdotes since there is no system for documenting disability supports. Some policy modifications, aids, and services have included:

- Additional supportive instruction from volunteer coaches.
- Specialized equipment like an aquatic wheelchair and floatation devices.
- Accessible transportation for excursions.
- Allowing a participant to attend the program with a personal care attendant.
- Allowing a participant to play down an age-level so as to be accompanied in the program by a younger sibling.

Policy modifications should be made as long as the modification does not fundamentally alter the nature of the program or result in a safety risk for the participant or others. Each of these modifications, aids, and services should be centrally coordinated and assessed on a case-by-case basis. Allowing a participant to play down an age-level may be appropriate at age 7 or 8; but doing so at older age levels may pose a safety risk in contact sports where one participant is physiologically larger than other participants. Centrally coordinating disability-related requests can provide consistency in service delivery among various programs. Requests that may pose a direct threat, fundamental alteration, or undue burden would then be reviewed by the program committee or accessibility management team and forward a recommendation to the executive director (designated responsible employee) for a final decision.

While advance registration programs enable staff to set up disability related supports for the first day the program meets, open/drop-in programs pose their own challenges. Open programs without advance registrations allow members of the public to show up for the event or activity. Therein lies the challenge for staff: what disability-related supports should be ready to go on site? What auxiliary aids or services may require more lengthy planning based on the availability of local resources? Can a public entity ask that people with disabilities call in advance to request auxiliary aids and services? How far in advance? 3-days or 3-weeks? Does this advance request create a situation of disparate impact on people with disabilities by requiring them to take additional measures when people without disabilities can spontaneously show up to the open program without making advance requests? The District inclusion statement may be omitted from individual program brochures, fliers, and other online marketing content for open/drop-in programs. The information gap poses a challenge for people with disabilities to connect to the process for making requests

for auxiliary aids or services in programs and activities that are open and do not require pre-registration. Thus, it is necessary to include a statement on how to make requests for auxiliary aids and services within each individual open program marketing initiative.

**Required:** Revise the registration processes to include an option for individuals to request an auxiliary aid, service, or other disability-related accommodation. The section should NOT make unnecessary inquiry to the specifics of a disability. Instead, it should offer examples of what types of auxiliary aids, services and accommodations might elicit a response. An example:

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

- wheelchair accessible program location
- sign language interpreter
- reader
- real-time captioning
- assistive listening system
- audio description or descriptive services
- allergy or dietary accommodation
- behavioral support
- inclusion support (i.e. activity modifications, assistance with tasks)
- braille
- large print
- advance information in electronic format
- other (please explain \_\_\_\_\_)

**Recommended:** Centrally coordinate the process to provide auxiliary aids and services to establish consistency among programming units, maximize resources, track, and evaluate disability supports.

**Recommended:** Adopt a practice to publish information on how individuals with disabilities can request disability-related accommodations for programs, activities and events that do not require advance registration. Include a statement in all marketing initiatives for open programs, such as:

Requests for disability-related services can be made by calling [insert program coordinator name] (555) XXX-XXXX at least [insert timeframe] in advance.

If you have a disability and require an auxiliary aid or service for the program, activity, or event, please call [insert program coordinator name] (555) XXX-XXXX at least [insert timeframe] in advance so we can have that set up for your arrival.

## 8.4 Emergency Contact and Medical Information

It is common practice for program providers to ask for emergency contact and medical information from participants in programs that are longer than one hour in duration and the parent/guardian is not physically on site. In the event of an emergency, the program provider may need to convey medical information for a minor child in their care. Medical information is private. As such, medical information should not be blanketly collected from all program participants. Each program should be evaluated individually to determine the business necessity for collecting any type of medical information. If collected, the medical information should be kept separate and confidential from other files.

**Recommended:** Establish a policy for the collection of medical information. If it is necessary to collect medical information for minor participants, that information should be kept on a paper completely

separate from a registration form. It should be secured and only shared with staff on a need to know basis. Each program should evaluate whether or not the collection of medical information is necessary.

## 8.5 Inclusion Support

As the availability of disability-related auxiliary aids and services become more widely known, and as program staff become more versed in supporting people with disabilities programmatically, it is likely that requests will get more complex. Including people with mobility impairments may be as easy as providing an accessible location or accessible equipment; and accommodating participants who are deaf may range from writing notes back and forth to having a sign language interpreter on site or via remote video. Including youth with developmental disabilities in recreation programs has evolved as one of the more staff-intensive services since auxiliary aids and services for this population are not always as concrete. Disability-related supports for people with cognitive impairments may include giving directions in simple terms or shorter sequences, providing directions after each step or assistance staying on task, practicing skill development, giving positive reinforcements, facilitating communications to develop friendships, and guiding modifications for improved behavior. In the field of community recreation, the *certified therapeutic recreation specialist* (CTRS) has emerged as the go-to practitioner to assess the needs of individual participants, identify interventions for maintaining or improving health, and implement inclusion supports to achieve those desired outcomes. The CTRS has a background in recreation with a specialization for understanding the needs of people with disabilities and the adaptations that will enable them to be successful in their leisure pursuits. The CTRS can train staff on disability needs and modifications, make recommendations for staff ratios, and coordinate inclusion staff to facilitate program goals for participants with disabilities. Having a CTRS on staff has become an accepted best practice in park and recreation administration. This TR professional can guide program staff in the securement of auxiliary aids and services; implement leisure education strategies for recruiting participation among people with disabilities; and connect the recreation agency with other service providers to collaborate and build community wellness. Considering the growth underway, the MRD team could benefit from the expertise of a CTRS on staff.

**Recommend:** Explore options to add a *certified therapeutic recreation specialist* (CTRS) to the MRD team to coordinate inclusion support, specialty programs, and community collaboration benefitting residents with disabilities.

## 9. EFFECTIVE COMMUNICATION

Title II, § 35.160(a)(1), requires a public entity take appropriate steps to ensure that communications with people with disabilities are as effective as communications with others. Further, the Title II regulation states the type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the method of communication used by the individual; the nature, length, and complexity of the communication involved; and the context in which the communication is taking place. In determining what types of auxiliary aids and services are necessary, a public entity shall give primary consideration to the requests of individuals with disabilities. In order to be effective, auxiliary aids and services must be provided in accessible formats, in a timely manner, and in such a way as to protect the privacy and independence of the individual with a disability (§ 35.160(b)(2)). Discussion of electronic and information technology will be addressed in Part 2 of this report.

## 9.1 Interpretive Services

The District has not received requests for in-person sign language interpreters, video remote interpreting services, or real-time captioning within the last three years. The availability of sign language interpreters can be challenging based on the remoteness of Montrose from metropolitan centers where their services are in greater demand. Video remote interpreting services have gained in popularity and showed great promise during the community engagement sessions when local in-person interpreters were not available. During the focus groups, community members suggested connecting with the school district as another resource for sign language interpreters. In terms of recreation programming, there is likely a need to provide balance between in-person interpretive services and when it is done via remote video. For special events, board meetings and longer programs, in-person interpretive service may be most effective. Use of video remote interpretive services may be more appropriate for internet-based program delivery and those unexpected circumstances that spring up when an in-person interpreter may not be available.

**Recommended:** Identify interpretive service providers; establish agreements with the providers; maintain the list of providers making it available to staff in each department; and ask participants to evaluate the quality of the interpretive services following the program.

**Recommended:** Continue to explore the new technology options for sign language interpreters; and provide an in-service to departments on the circumstances, advantages, and disadvantages of in-person interpretive services versus use of the online service.

## 9.2 Alternate Formats

MRD employs multiple communication vehicles to disseminate information to residents, visitors, and businesses. These can include publications, brochures, reports, surveys, newsletters, bulletins, web sites, and social media. Traditionally under the ADA, alternate formats have been known to include Braille, large print, audio recordings, and electronic files in text or rich text format. Technology has made it much easier to provide alternate formats, especially electronic files. As such, requests for audio recordings are no longer as prevalent since electronic files can be read aloud with screen reading software.

The District publishes a seasonal program guide that is mailed to residents and posted electronically on the District web site. Staff do not recall specific requests for accessible program guides or other documents in recent years. A top-level review of documents for the public revealed that publications do not state that the document can be provided in alternate formats. The lack of information on the availability of alternate formats may be attributed to the lack for requests. Making publications available in Braille and large print requires more planning. As a best practice, many entities order their primary publications in Braille and large print upfront to make them readily available alongside the print versions. This approach should be evaluated on a case by case basis with considerations to the use of the publication and the audience.

**Required:** Ensure all new publications include a statement “This publication available in alternate format (large print, braille, electronic, etc.) upon request” (*§35.149 Program accessibility; §35.160 Communications*).

**Recommended:** Identify service providers that can translate documents to Braille and establish agreements for use of their professional services.

**Recommended:** Gather input from community members with visual impairments and participants in the 55+ programs to assess the need to make a run of seasonal program guides and other documents formatted for large print.



## 10. EMPLOYMENT

The District employs 23 full-time staff and more than 300 part-time/seasonal staff. The Human Resources Department supports the employment functions for the public entity including recruitment, training and development, employee benefits, compensation, job classifications, and policy development. MRD publishes an employee handbook and a non-discrimination statement that is specific to “physical” disability rather than the broad types of disability such as visual impairment, cognitive impairments, and hearing impairments:

*The Montrose Recreation District is an equal employment opportunity employer and is committed to a non-discrimination program. All recruitment, hiring, placements, transfers, and promotions are based on the qualifications of the individual for the position being filled. Regardless of race, color, religion, ancestry, national origin, age, gender, marital status, medical condition, sexual orientation, pregnancy, or **physical disability** unless the necessary accommodation places an undue hardship on MRD.*

The District subscribes to the [www.workbright.com](http://www.workbright.com) web service to post position announcements, accept job applications, and screen prospective candidates. The web service provides templates for employers and limited customization of forms. Job postings for MRD include a form on the voluntary self-identification of disability. While it may be permissible to collect this type of information for federal reporting, the voluntary form should not be associated with the job candidate’s personal information or application. It is not clear from the Workbright user guide how the data from the voluntary form is stored and whether it is disassociated from the candidate’s profile.

## Voluntary Self-Identification of Disability

Form CC-305

OMB Control Number 1250-0005

Expires 05/31/2023

Your Name

Today's Date

Employee ID (if applicable)

### Why are you being asked to complete this form?

We are a federal contractor or subcontractor required by law to provide equal employment opportunity to qualified people with disabilities. We are also required to measure our progress toward having at least 7% of our workforce be individuals with disabilities. To do this, we must ask applicants and employees if they have a disability or have ever had a disability. Because a person may become disabled at any time, we ask all of our employees to update their information at least every five years.

Identifying yourself as an individual with a disability is voluntary, and we hope that you will choose to do so. Your answer will be maintained confidentially and not be seen by selecting officials or anyone else involved in making personnel decisions. Completing the form will not negatively impact you in any way, regardless of whether you have self-identified in the past. For more information about this form or the equal employment obligations of federal contractors under Section 503 of the Rehabilitation Act, visit the U.S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) website at [www.dol.gov/ofccp](http://www.dol.gov/ofccp).

### How do you know if you have a disability?

You are considered to have a disability if you have a physical or mental impairment or medical condition that substantially limits a major life activity, or if you have a history or record of such an impairment or medical condition. *Disabilities include, but are not limited to:*

- Autism
- Autoimmune disorder, for example, lupus, fibromyalgia, rheumatoid arthritis, or HIV/AIDS
- Blind or low vision
- Cancer
- Cardiovascular or heart disease
- Celiac disease
- Cerebral palsy
- Deaf or hard of hearing
- Depression or anxiety
- Diabetes
- Epilepsy
- Gastrointestinal disorders, for example, Crohn's Disease, or irritable bowel syndrome
- Intellectual disability
- Missing limbs or partially missing limbs
- Nervous system condition for example, migraine headaches, Parkinson's disease, or Multiple sclerosis (MS)
- Psychiatric condition, for example, bipolar disorder, schizophrenia, PTSD, or major depression

### Please select one of the options below:

I Don't Wish To Answer



**PUBLIC BURDEN STATEMENT:** According to the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. This survey should take about 5 minutes to complete.

Image 3 Voluntary self-identification of disability form that accompanies online employment application.

The posted job descriptions broadly list responsibilities and tasks as “essential duties.” The job descriptions are not formatted to differentiate between essential functions and marginal functions. Essential functions are the basic job duties that an employee must be able to perform, with or without reasonable accommodation.<sup>8</sup> A marginal function is a job-related task that is not an essential aspect of the job. Because this task is non-essential, it could be removed from an employee's job responsibilities if the employee were unable to perform the task due to a disability. Presenting job descriptions that outline essential and marginal functions along with physical requirements communicates the employer's expectations with prospective new hires and current employees. Some job descriptions include “physical conditions.” Similar to the description of essential duties, the “physical conditions” are broadly defined or omitted on some job descriptions. In this job description, “walking” and “standing” are listed in the physical conditions.

*Primary functions may require maintaining the physical condition necessary for walking, standing, or sitting for prolonged periods. This position will require moderate lifting, and heavy lifting on occasion, and working in outdoor weather conditions.*

The actual physical demand for the person in this job may be that they are always on the move leading recreation activities. Rather than describing this section as “physical conditions” and terms like stand, sit, or talk; it would be more acceptable to refer to it as “physical requirements” with terms like move, stationary position, and communicate.

As a best practice, organizations will conduct a job analysis at 5–10-year intervals to identify the job responsibilities, the relationship to other positions, and the qualifications for the position, while determining if the nature of the positions have changed at all. During the job analysis, the physical requirements would also be identified along with the percentage of time allotted to each function. The completion of the job analysis process can give an organization assurance that each position has been accurately and consistently described and categorized among the broad roles it must employ.

Both the employee handbook and the online application include information directing applicants and employees to request reasonable accommodations. The online information for applicants follows the

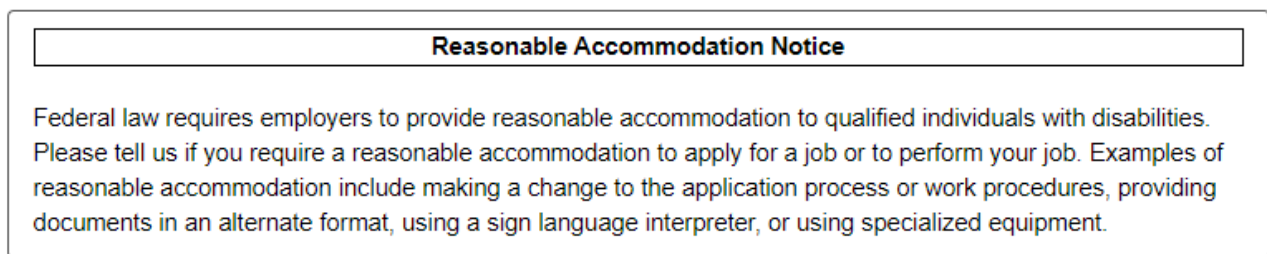


Image 4 Reasonable accommodation notice from online employment application.

<sup>8</sup> EEOC describes seven factors to determine whether a function is an essential function of the job.

1. Whether the reason the position exists is to perform that function.
2. Number of other employees available to perform the function or
3. among whom the performance of the function can be distributed.
4. Degree of expertise or skill required to perform the function.
5. Actual work experience of present or past employees in the job.
6. Time spent performing a function.
7. Consequences of not requiring that an employee perform a function.
8. Terms of a collective bargaining agreement.

voluntary form on self-identification of disability and lack specifics on how/who/when to contact to request an accommodation during the application and interview processes:

The employee handbook states that employees can request disability-related accommodations in two sequential sections, however the process in the first begins with the supervisor and in the second begins with Human Resources:

*1.30 EQUAL EMPLOYMENT OPPORTUNITY AND COMMITMENT TO DIVERSITY Any applicant or employee who requires an accommodation in order to perform the essential function(s) of the job should request such accommodation from Human Resources. If already employed, the employee should request such accommodation(s) from his or her supervisor or manager. It is the responsibility of the individual with the disability to specify the accommodation(s) needed to perform the essential function(s) of the job. MRD retains the right to deny an accommodation(s) if the accommodation(s) are unreasonable or place an undue hardship on the organization.*

*1.40 AMERICANS WITH DISABILITY ACT (ADA) AND REASONABLE ACCOMMODATION In accordance with the ADA, reasonable accommodations will be provided to qualified individuals with disabilities to enable them to perform the essential functions of their jobs or to enjoy the equal benefits and privileges of employment. An employee with a disability may request an accommodation from the HR department and engage in an informal process to clarify what the employee needs and to identify possible accommodations. If requested, the employee is responsible for providing medical documentation regarding the disability and possible accommodations. All information obtained concerning the medical condition or history of an applicant or employee will be treated as confidential information, maintained in separate medical files, and disclosed only as permitted by law.*

There are no specific forms for the employee to complete. Medical documentation of the disability may be required by Human Resources. Miscommunication between the employer and the employee is more likely to occur when the accommodation process is not clearly outlined. Employees should have information on who the request should be made to, whether it be the supervisor or human resources; any necessary paperwork that should be completed in advance; examples of disability-related accommodations; and any appeal process should the accommodation request be denied. It is a good idea for employers to describe how the reasonable accommodation is determined, preferably with input from the employee, supervisor, and HR accommodation specialist.

New employee orientation includes aural description of the accommodation process. There is no specific training or requirement for employees, supervisors, or supervisors conducting interviews, to complete training on ADA compliance. The District has not instituted a specific practice for recruiting applicants with disabilities.

**Required:** Update individual job descriptions to be formatted with the essential functions, marginal functions and physical requirements for each employment position. Job descriptions formatted in this manner should serve as guidance to clearly define which essential functions must be performed either with or without a reasonable accommodation, which marginal functions may be reassigned, and how the essential functions are related to physical tasks (§35.140 Employment).

**Recommended:** Edit the non-discrimination statement to remove “physical” before disability so as to address the broad range of disabilities.

**Recommended:** Update the employee handbook to outline the procedure for employees to request ADA accommodations. Ensure the procedure includes information on timelines the employee should expect are followed, documents to be completed, medical documentation required, and the appeals process should a request be denied.

**Recommended:** Utilize and designate an HR specialist as an accommodation specialist to support employees and supervisors through the ADA accommodation process.

**Recommended:** Develop a system to track the receipt, documentation, review process, accommodation provided/denied, and outcome of the appeals for ADA accommodations in the new HR system.

**Recommended:** Review the District's recruitment/hiring practices to ensure that sources for recruitment include organizations that train and place people with disabilities and that job announcements, job fairs, etc. are accessible to persons with disabilities.

**Recommended:** Conduct annual disability awareness training for ALL District personnel to build a culture whereby disability is understood to be a part of the diversity of the District's workforce.

**Recommended:** Develop a training calendar and training modules for supervisors and managers on ADA accommodations; and the interplay between the ADA and FMLA, reassignment, and collective bargaining agreements. Consider use of an online learning manager system to document completion of required and elective training.

**Recommended:** Provide support for professional development to staff interested in completing the [ADA Coordinator Training Certification Program](#) offered through the Great Plains ADA Center and participating in the monthly webinars presented by the [National Network of ADA Centers](#).

### **SAMPLE - EMPLOYEE REASONABLE ACCOMMODATION REQUEST<sup>9</sup>**

To be eligible for a reasonable accommodation under the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973, you must (1) be qualified to perform the essential functions of your position and (2) have a qualifying disability that limits a major life function. A detailed explanation of the rights and obligations of employees under the ADA is contained in The Americans With Disabilities Act: Your Employment Rights as an Individual with a Disability, <http://www.eeoc.gov/facts/ada18.html>

In order to complete this form, you will need to discuss the essential functions of your job with your supervisor and the supervisor should provide the employee with a list of essential functions for the position held. You may also contact the Director of Human Resources if you have questions or need information about the ADA or the process for requesting reasonable accommodation. All information submitted through this process will remain confidential. Completed request forms should be submitted to the Director of Human Resources.

#### Employee Information

Name:

Job Title:

Department/Unit:

Telephone:

E mail:

Supervisor's Name:

1. Describe your disability and how it limits a major life function (s).
  
2. Describe any mitigating measures (medication, assistive technologies such as wheelchairs, etc.) you are using because of the disability, and the effect of those measures on the disability.
  
3. Describe how the disability limits your ability to perform the essential functions of your job. Identify the essential functions affected and be specific about how the disability impairs your ability in each instance.
  
4. Describe the accommodation you are requesting.
  
5. Explain how the accommodations you are requesting will enable you to perform the essential functions of your job. Be specific.

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<sup>9</sup> This sample form has been modified, with permission, from the Great Lakes ADA Center, University of Illinois at Chicago.

6. Will you be able to perform all of the essential functions of your job if you receive the requested accommodation? If not, describe the specific functions you will not be able to perform.

7. Do you need assistance to identify accommodations that will enable you to perform the essential functions of your job? If you do, explain what type of assistance you need.

8. Provide any information or suggestion you can on how the requested accommodation(s) can be provided. If known, include the names, addresses and telephone numbers of vendors and the model number and approximate cost of any equipment requested.

9. Additional Information you would like to have considered related to your request for a reasonable accommodation.

\_\_\_\_\_  
Employee Name (Please print)

\_\_\_\_\_  
Work Telephone

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

SUBMIT THE COMPLETED FORM TO THE DIRECTOR OF HUMAN RESOURCES.

Questions regarding this form or the reasonable accommodation process should be directed to the Director of Human Resources or for more information on the ADA contact the Rocky Mountain ADA Center at (800) 949-4232.

All information submitted for consideration as part of the reasonable accommodation process will remain confidential.

## PART 2 – EFFECTIVE COMMUNICATION: INFORMATION TECHNOLOGY

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When the original ADA regulations were issued in the 1990s, it did not include electronic and information technology such as web sites, mobile apps, streaming videos, e-books, digital visual files, and social media, because the formats did not yet exist. The U.S. Department of Justice, as the federal enforcement agency under Title II and Title III of the ADA, has issued multiple guidance documents and intervened in numerous cases of litigation asserting the ADA applies to web sites and other information technology. In an effort to guarantee people with disabilities access to state government, in 2021 the Colorado legislature passed HB21-1110 updated existing state law making it a state civil rights violation for a government agency to exclude people with disabilities from receiving services or benefits because of lack of accessibility. In addition, HB21-1110 gave the [State Office of Information Technology](#) (OIT) authority to issue rules for state and local government websites and oversee the implementation of web accessibility plans for departments within the state government. Most notable, HB21-1110 makes non-compliance with the OIT rules by state agencies or local governments subject to injunctive relief, monetary damages; or a fine of \$3,500 payable to the plaintiff, who must be someone from the disability community.

A broad review of the District’s public facing electronic and information technology was assessed for compliance with the international voluntary standard, the [Web Content Accessibility Guidelines](#) (WCAG) version 2.1 at level AA. Evaluation of web pages was performed with [WAVE, the Web Accessibility Evaluation Tool developed by WEBAIM](#). Evaluation of PDFs, social media, videos and other content was performed with a screen reader and other manual tools like tabbing through navigation, reviewing caption settings, and turning images off. The following discussion notes some of the barriers that may be encountered by people with disabilities gaining access to content and trying to perform certain tasks like registering for a program or applying for a job.

### [www.montroserec.com](http://www.montroserec.com), MRD Website

The District web site is designed and hosted by CivicPlus, an online service that allows the client to post content without needing to know the technical programming. This type of content management system also enables a staff lead to serve as the publisher for the main pages and program staff to be responsible for individual pages where content changes are approved by the lead publisher. The WAVE evaluation did not show any significant compliance errors on the main pages, but there were several in the sub-pages. Non-compliance issues on sub-pages included:

- Empty headings.<sup>10</sup>
- Empty links.<sup>11</sup>
- Empty table headers for the family/open swim matrix.

WAVE identified issues with the overall site design including:

- Contrast errors with very low contrast between the blue side navigation and the black text.
- The text title and the alternative text are redundant.

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<sup>10</sup> WAVE explains, “Some users, especially keyboard and screen reader users, often navigate by heading elements. An empty heading will present no information and may introduce confusion.”

<sup>11</sup> WAVE states, “If a link contains no text, the function or purpose of the link will not be presented to the user. This can introduce confusion for keyboard and screen reader users.”



- Redundant links<sup>12</sup>.
- Redundant alternative text.
- No script elements.<sup>13</sup>

Other website components:

- An interactive map was created in Google Maps to accompany the list of MRD facilities and parks. While the interactive map may be a preference for some users, the dynamic map is not navigable by people using screen readers or adaptive technology that is not compatible with the script. A printable image and also be used in the seasonal program guide.
- The Baldrige Disc Golf Course was created as a Google Map. While the interactive map may be a preference for some users, the dynamic map is not navigable by people using screen readers or adaptive technology that is not compatible with the script. A printable image with text description could provide an accessible option for those users.

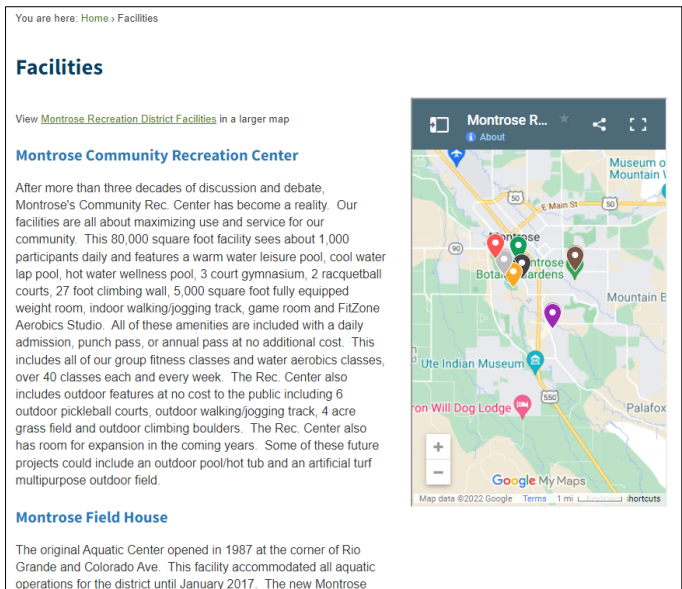


Image 5 Interactive map showing location of parks and facilities.

- PDF forms like the scholarship application and the liability waiver for the climbing wall are posted to the website. The forms do not allow the user to complete the fields electronically. Consider formatting the online PDF forms as accessible fillable forms that can be filled out electronically and then printed. Some online web services also allow for tailoring waivers that can be completed and submitted electronically.

The federal government must comply with Section 508 of the Rehabilitation Act and ensure that any electronic and information technology developed or procured by a federal agency must be accessible to people with disabilities. The General Services Administration hosts an online [Section 508](#) resource that offers a wide variety of technical guides and training options that can also be of benefit to IT specialists working in state and local government. Immersion in these free online resources can help to address many of the corrective actions necessary for components of the District website.

<sup>12</sup> WAVE states, "When adjacent links go to the same location (such as a linked product image and an adjacent linked product name that go to the same product page) this results in additional navigation and repetition for keyboard and screen reader users."

<sup>13</sup> WAVE states, "Content within <noscript> is presented if JavaScript is disabled. Because nearly all users (including users of screen readers and other assistive technologies) have JavaScript enabled, <noscript> cannot be used to provide an accessible version of inaccessible scripted content."

# Seasonal Activity Guidebook & PDFs

The seasonal activity guide is printed and distributed to households throughout the District. In addition, it is provided electronically as PDFs published online in an “interactive flipbook” format through the Calaméo online platform. The complex design of the original document has resulted in PDFs that are not accessible. Most commonly, images lack text descriptions and text boxes are indexed out of order, so the document then reads headlines and paragraphs aloud out of order. As originally designed in desktop publishing applications like Adobe InDesign, additional programming is required to render the PDFs as accessible and compatible for screen readers. Interactive flipbooks use intensive JavaScript which is not compatible with screen reading software like [JAWS](#) by Freedom Scientific, which is the most common application used by people with visual impairments. The free version of Calaméo does not even allow users to download a PDF that could be formatted as the accessible version.



Image 6 MRD seasonal guidebook displayed as flipbook on Calameo platform.

Swim levels are posted to the website as a PDF.

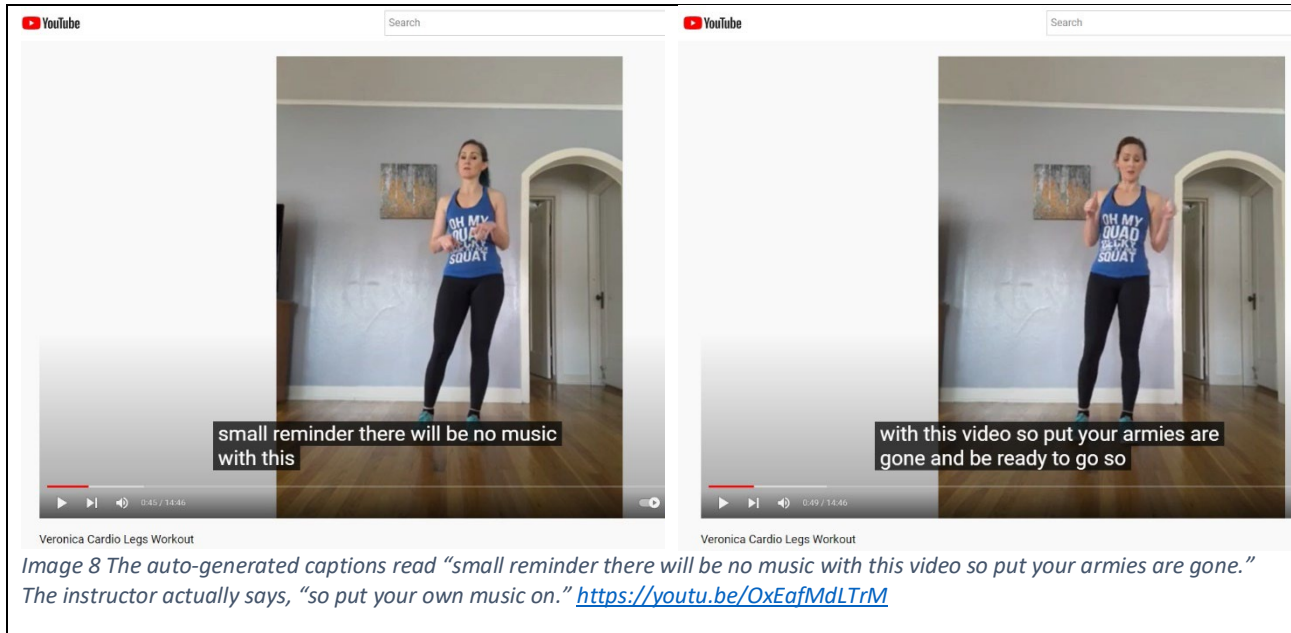
The document renders as an image without equivalent alternative text, thus the content is not accessible.

<p><b>LEVEL 1</b> <i>Introduction to Water Skills</i></p> <p>The objectives of Level 1 are to learn basic personal water safety information &amp; skills; to help participants feel comfortable in the water &amp; to enjoy the water safely. Participants will also learn to enter/exit water safely, submerge mouth, nose &amp; eyes, exhale &amp; open eyes underwater, roll over from front to back &amp; back to front with support, explore floating on front/back with support, explore swimming on front/back using arm &amp; leg actions with support &amp; use of a life jacket.</p> <p><b>Fee: \$42</b></p>	<p><b>LEVEL 2</b> <i>Fundamental Aquatic Skills</i></p> <p>The objective of Level 2 is to give participants success with fundamental skills. Participants learn to float without support and to recover to a vertical position. This level marks the beginning of true locomotion skills. Participants continue to explore simultaneous and alternating arm and leg actions on the front and back to lay the foundations for future strokes.</p> <p><b>Fee: \$42</b></p>	<p><b>LEVEL 3</b> <i>Stroke Development</i></p> <p>The objectives of Level 3 are for participants to learn the survival float, the elementary backstroke and to coordinate the front crawl. They are introduced to the scissors kick and the dolphin kick and build on the foundations of treading water. Participants also learn rules for headfirst entries and begin to learn to enter the water headfirst from the side of the pool.</p> <p><b>Fee: \$42</b></p>
<p><b>LEVEL 4</b> <i>Stroke Improvement</i></p> <p>The objectives of Level 4 are to develop confidence in the strokes learned thus far and to improve other aquatic skills. Participants improve their skills and increase their endurance by swimming familiar strokes (front crawl, elementary backstroke) for greater distances. Students also continue to build upon the scissor kick and the dolphin kick by adding arms for the sidestroke and butterfly. The back crawl and the breaststroke are introduced in Level 4, as well as the basics of turning at a wall.</p> <p><b>Fee: \$42</b></p>	<p><b>LEVEL 5</b> <i>Stroke Refinement</i></p> <p>The objectives of Level 5 are to coordinate and refine strokes. Participants refine their performance of all the strokes (front crawl, back crawl, butterfly, breaststroke, elementary backstroke and sidestroke) and increase their distances. Flip turns on the front and back are also introduced.</p> <p><b>Fee: \$42</b></p>	<p><b>LEVEL 6</b> <i>Swimming &amp; Skill Proficiency</i></p> <p>The objective of Level 6 is to refine the strokes so students swim them with ease, efficiency, power and smoothness over greater distances. Level 6 is designed with "menu" options that focus on preparing students with a variety of activities. Options include: Personal Water Safety, Lifeguard Readiness, Fundamentals of Diving and Fitness Swimmer.</p> <p><b>Fee: \$42</b></p>
<p><b>PARENT &amp; TOT</b></p> <p>This course is designed for children 6 months to 3 years of age and their parents. Parent and Child Aquatic classes build swimming readiness by emphasizing fun in the water.</p> <p><b>Fee: \$42</b></p>	<p><b>PRESCHOOL</b></p> <p>(Ages 3 to 5 years) This class teaches the foundation for learning to swim. Children learn the ready position, floating, kicking, blowing bubbles and rhythmic breathing.</p> <p><b>Fee: \$42</b></p>	<p><b>ADULT</b></p> <p>We will be forming a waiting list of interested adults for an adult only swim class. Please contact Liz at the Aquatic Center for more information.</p> <p><b>Fee: \$42</b></p>

Image 7 Swim levels displayed as an image in a PDF file.

## Streaming Videos

The District website includes links to staff created exercise videos posted to YouTube. Quick videos are also posted to social media. Most videos either lack captions or use the YouTube auto-generated caption feature. It should be noted that auto-generated captions have an accuracy rate around 80 percent. The use of auto-generated captions requires extra steps to check spelling, add punctuation, and change placement of captions so as not to overlay other intentional graphics. Videos should include accurate captions to communicate the content for people who are deaf or hard of hearing.



## Vermont Systems RecTrac Online Registration

<https://register2.vermontsystems.com/wbwc/comontrose.wsc/splash.html>

The online registration system is an online subscription service where the recreation agency subscribes to preset modules like class registration, meeting space, sports facility scheduling, and other widgets. Some of the preset modules can be tailored by editing labels, but the overall function is not really flexible. The initial setup for the online registration is very timely to input all classes and form fields. It also involves a learning curve for the end user to know in advance to set up the accessibility features, like form labels and alternative text, at the same time. WAVE identified multiple issues of non-compliance on the landing page for the online registration. There were eight images that lacked alternative text and contrast errors between the background and similar colored foreground text.

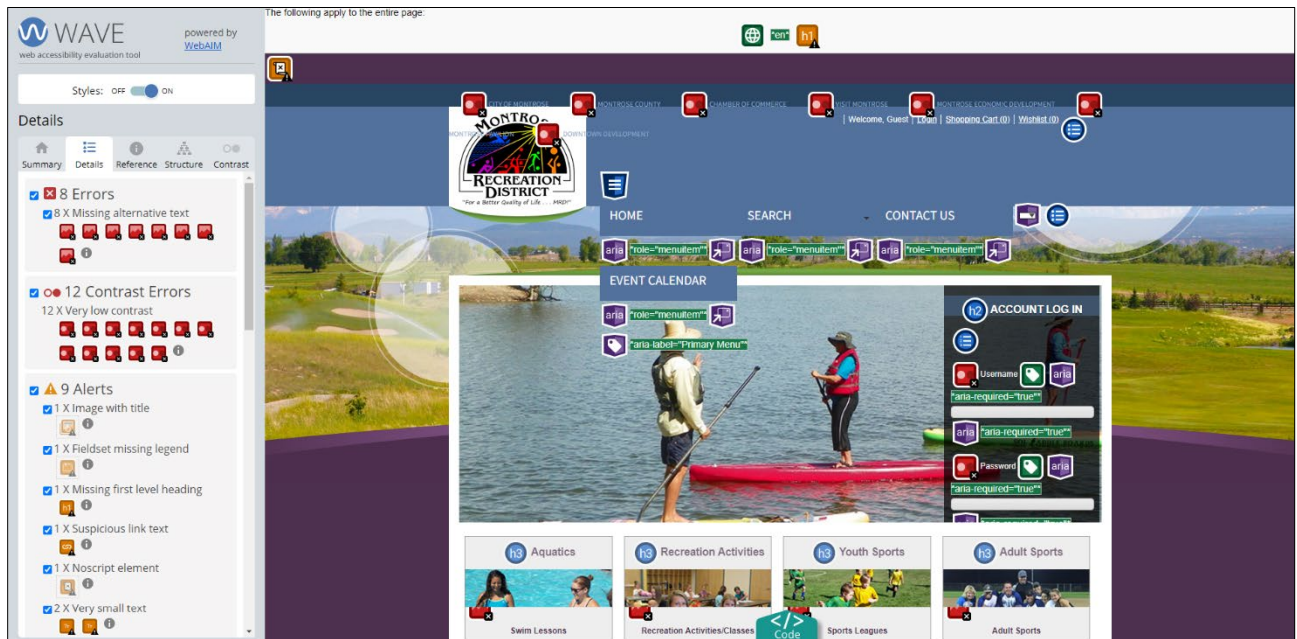


Image 9 WAVE evaluation results for landing page of online registration platform.

## Online Job Applications / Postings

The District subscribes to the [www.workbright.com](http://www.workbright.com) web service to post position announcements, accept job applications, and screen prospective candidates. Similar to the online program registration service, some of the preset modules can be tailored by editing labels, but the overall function is not really flexible. The initial setup requires the end user to know in advance to set up the accessibility features, like form labels and alternative text. There were several instances through the application process where the form fields were missing labels.

The screenshot shows the Wave accessibility evaluation tool on the left side of the browser window. The tool's interface includes a 'Details' tab with a list of errors and alerts. The errors listed are: 7 total errors, including 1 missing form label, 6 multiple form labels, 8 contrast errors (8 very low contrast), and 14 alerts (2 skipped heading levels, 1 redundant link, 1 JavaScript jump menu, and 10 tabindex issues). The main content area of the browser shows the 'Applying for Recreation Coordinator - Youth' application page. The page has a 'Date: Until Filled' field and a navigation menu with options like 'Instructions', 'Voluntary Disclosure', 'General', 'Education', 'Employment History', 'References', 'Affidavit, Consent, & Release', 'Source', 'Resume & Cover Letter', and 'Submit Application'. The 'Employment History' section is active, displaying instructions and a form to add employers. The form includes fields for 'Company Name\*' and 'Company Address\*', both marked as required (aria-required="true").

Image 10 Wave evaluation results for a section of the online employment application.



## Social Media

Like many other organizations trying to navigate opportunities to expand communications through social media, MRD has multiple social media profiles with an active calendar of posts on events, news items, and public service announcements. Photos and infographics are common tools to attract more engagements. However, many of the visual images lack the equivalent text descriptions. Without alternative text descriptions, the content is not accessible to people with visual impairments or users who have turned images off in their browser. In these posts, the screen reader software simply reads “image” aloud and misses the important content within the image like the hours and location of the outdoor pool, upcoming dates for the youth hiking club, or opportunities to register for the stick mobility program to improve your mobility and movement quality. As such, it is critical that the graphical information is communicated effectively for people with visual impairments by adding alternate text to the images or a longer description of the image at the end of the text within the post.

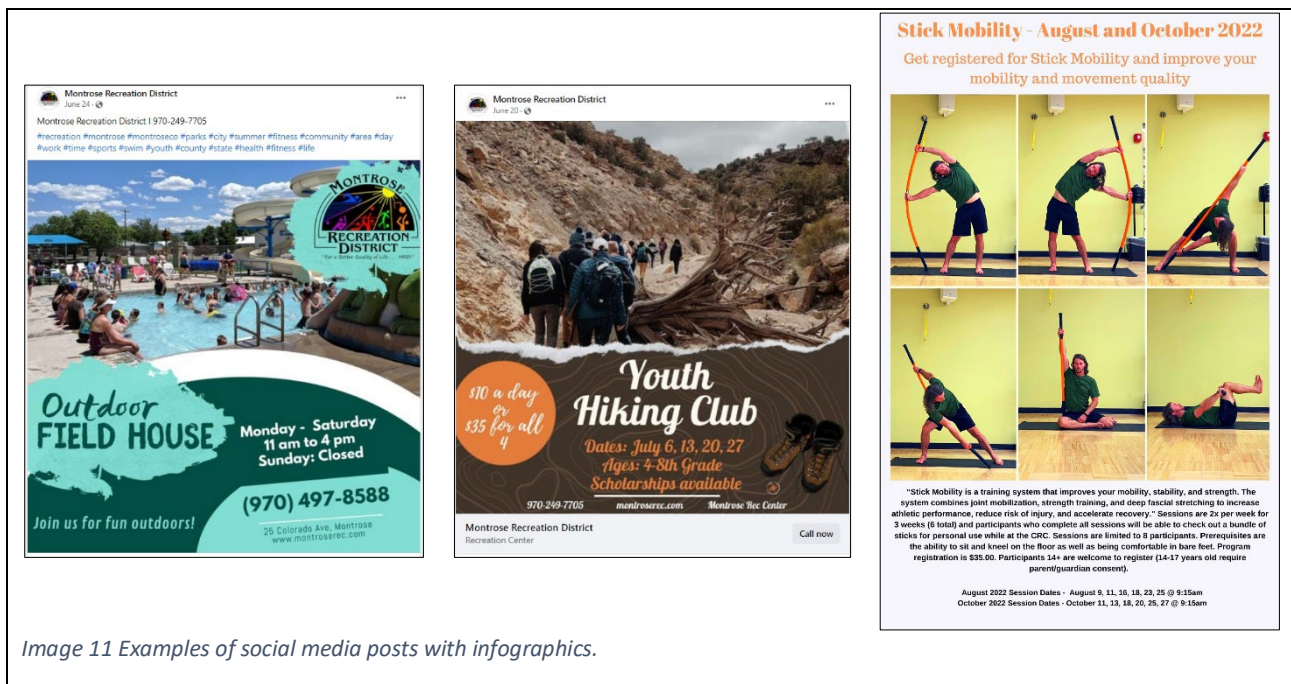


Image 11 Examples of social media posts with infographics.

The process to make electronic and information technology can be complex and overwhelming without a systematic approach. All state agencies and local governments must be compliant with the Colorado HB21-1110 state standards by July 1, 2024. This should provide enough lead time for the District to develop a comprehensive approach and implement some key strategies. First, leadership should determine the remaining lifecycle for current technology like the main website, online registration platform, job application platform, social media content, mobile apps, and other technologies. For example, if there are plans to update the design and structure of the District website over the next year, energies should go toward making the new website accessible and publishing it live rather than updating old content that will be overwritten by the new site. Having a lead marketing or IT specialist to drive this process would be of great benefit to efficiently expedite accessibility improvements.

**Required:** Develop a comprehensive information technology accessibility plan to ensure the current main District web site, online job applications, online registration forms, and all new web sites, mobile apps, and other technologies are accessible to people with disabilities.

**Required:** Adopt a District standard for accessible electronic and information technology referencing the WCAG 2.1 or later.

**Required:** Make corrective actions to the main website, sub-pages, and auxiliary web sites like the online registration and employment pages to comply with the WCAG 2.1 level AA standards.

**Required:** Adopt a standard practice to create accessible PDF files for primary publications; and prepare to provide other electronic formats if requested.

**Required:** Ensure all new social media posts are accessible with alternative text for images and captions for videos.

**Required:** Ensure all new PSA videos are produced with open captions. If auto-generated captions are utilized, they should be proofread for spelling, punctuation, and screen placement.

**Recommended:** Appoint a lead Communications and/or IT staff as the accessibility compliance coordinator to ensure all new projects are designed to be accessible to people with disabilities using various adaptive technologies from the conceptualization and onset of development. This lead staff should drive usability testing of new District technologies specifically with a designated group of people with disabilities who use different types of adaptive technologies including screen readers, screen magnifiers, braille keyboards, alternate touch or mouse control devices, and other emerging adaptive technologies. This lead staff should also be trained to provide support to personnel and departments using contractors for IT development to ensure all new contracted IT projects are accessible and, at a minimum, compliant with the WCAG 2.1 or later.

**Recommended:** Provide training to staff responsible for communications within their respective departments on the application of the ADA to electronic information; how people with disabilities use adaptive technology to access information; and considerations for making electronic information like PDFs, web sites, videos, and social media accessible to people with disabilities.

**Recommended:** Identify and support continuing education on accessible publications and information technology for Communications, IT, and content management staff.

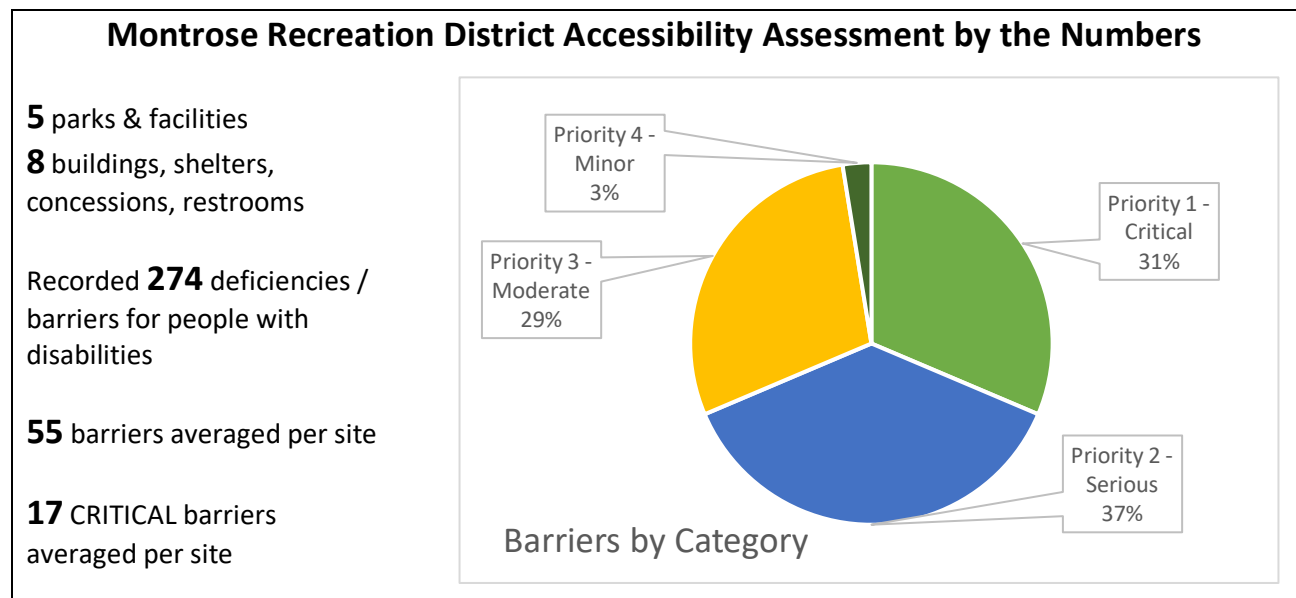
## PART 3 - ACCESSIBILITY ASSESSMENT

The ADA Evaluation of the Montrose Recreation District also included an accessibility assessment of parks and facilities. The purpose of the accessibility assessment was to identify physical and communication barriers to programs, services, and activities available to the public at supporting facilities. The resulting data is to form the foundation for the District’s ADA Transition Plan.

The accessibility assessment analyzed 5 parks and recreation facilities, including 9 buildings, for compliance with the federal accessibility standards, the state accessibility code, and the Title II “program access” requirement. Approximately 274 deficiencies were identified that pose physical or communication barriers for people with disabilities to successfully participate or gain the benefits of the programs, services or activities within the park or recreation facility.

Barriers for people with disabilities were categorized (*Critical, Serious, Moderate or Minor*) by the degree by which the barrier prohibits participation in recreational programs, activities, or experiences such as use of fishing areas, playgrounds, picnic areas, swimming pools, and sports fields. Corrective actions to improve access for people with disabilities at the 5 parks and recreation facilities are estimated at \$413,425; 31% of which are associated with CRITICAL barrier removal necessary to achieve “program access” under Title II of the ADA.

Every identified barrier, referred to as a “deficiency” has an associated recommendation for corrective action to improve access for visitors with disabilities and achieve “program access” in compliance with Title II of the ADA. This executive summary outlines the process for the assessment, the categorization of barriers, key findings, and recommendations for administrators to incorporate this data into an ADA Transition Plan for the District. The appendix includes an accessibility assessment detail report for each park and facility. The detailed reports, describing the barriers for visitors with disabilities and recommendations for corrective actions, should be utilized for setting priorities within the ADA Transition Plan, routine maintenance, and long-term capital planning.





# PROGRAM ACCESS & ACCESSIBILITY ASSESSMENT METHODOLOGY

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“Program Access” is the foundational principle for Title II of the ADA. When viewed in its entirety, programs, services, and activities must be accessible to people with disabilities. Sometimes in parks and recreation, the standard is misinterpreted to only include programs that are structured, staffed and require registrations. This is not the case. The term “program” under the ADA is very broad and really extends to all the experiences offered in parks and recreation settings including, but not limited to:

Archery	Exercise	Pavilion use
Baseball/softball	Fishing	Picnicking and grilling
Basketball	Fitness course	Pickleball
Biking	Golf	Playground
Birding	Handball	Restroom
BMX	Hiking	Skateboarding
Canoeing and kayaking	Historic preservation	Skiing and sledding
Community gardens	Horseback riding	Sports field
Concessions	Horseshoe pits	Swimming
Disc golf	Ice skating	Tennis
Dog park	Interpretation of nature and	Volleyball
Environmental education	history	Water playgrounds
	Nature area use	

These activities are the experiences or “programs” by which the public engages in at a park or recreation facility. At some sites a program like baseball may be the primary activity or reason that people come to that park and hiking trails may be a secondary experience. At other sites, there may be more than one or even several primary activities or reasons that people come to that site. The public entity should have a thorough understanding of visitor use patterns, including primary and secondary experiences, length of time at a site, volume of use and frequency of use. This data will help to guide prioritization of accessibility improvements.

The Title II “program access” standard does not require that ALL **existing facilities** are accessible. Instead, it requires that ALL **programs, services, and activities** are accessible. At sites where programs, services, and activities are offered but that currently are not physically accessible, the public entity is tasked with either 1) making the physical environment accessible to facilitate participation in the program, service or activity; OR 2) relocating the program, service or activity to an accessible location until such time that the existing inaccessible site is made accessible. **The focus of the accessibility assessment is to determine what corrective actions are necessary to achieve PROGRAM ACCESS, these are corrective actions that can ensure people with disabilities have the equal opportunity to participate and benefit from the activities and experiences associated with the park or recreation facility.**

The assessment team evaluated public spaces for program access and compliance with the accessibility standards and guidelines. The approach to the accessibility assessment is one where the sequence for data collection follows the visitor from the point of entrance to the park or facility and through the use of various programmatic experiences. Common elements for assessment included parking, exterior routes, entrances, interior routes, spaces where programs, services, and activities are conducted, service counters, concessions, restrooms, and outdoor recreation spaces such as picnic areas, viewing areas, trailheads, sports fields, playgrounds, swimming pools, and tennis facilities. Barriers to participation for visitors with disabilities were identified as deficiencies and corrective actions were recommended in the form of work orders/plans and capital improvements. Recommendations for corrective actions are based upon compliance with federal mandates; the state building code in instances where the building code is more

stringent; federal rulemaking under development for outdoor developed areas, public rights of way, and shared use paths in order to achieve program access; and recognized best practices for interpretive environments and universal design.

The 2010 ADA Standards for Accessible Design and the ABA Accessibility Standards specific to trails, picnic areas, and scenic viewing areas were the primary referenced standards. Proposed rules were referenced for guidance along with publications of noted best practices.

Referenced Standards & Guidelines	Compliance is REQUIRED.	Referenced Guidance	Best Practice
<a href="#">2010 Americans with Disabilities Act Standards for Accessible Design</a>	✓		
<a href="#">Title II of the Americans with Disabilities Act: State and Local Government</a>	✓		
State of Colorado referenced building codes: - International Building Code (IBC)(2018) - ANSI A117.1 Accessible and Usable Buildings and Facilities (current edition as referenced in IBC)	✓		
<a href="#">Outdoor Developed Areas</a> incorporated into the Architectural Barriers Act (ABA) Accessibility Standards (2013)		✓	
<a href="#">Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way</a> (PROWAG)(2011)		✓	
Advanced Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way - <a href="#">Shared Use Paths</a> (2013)		✓	
<a href="#">Smithsonian Guidelines for Accessible Exhibition Design Smithsonian Accessibility Program</a>			✓
<a href="#">Programmatic Accessibility Guidelines for National Park Service Interpretive Media</a>			✓
<a href="#">Principles of Universal Design</a>			✓

The 2010 ADA Standards for Accessible Design were issued after years of work by the U.S. Access Board to harmonize the standards with the International Building Code (IBC) and the ANSI A.117.1 Accessibility Standards. Periodic updates to the IBC and ANSI A.117 are issued on a 3-5 year cycle and adopted at the state and local levels. The revision and adoption process under the ADA are significantly longer. Thus, the ADA standards and building codes are quick to fall out of sync in the next cycle of revisions. It will be critical for planners, project managers, contractors, and maintenance personnel to stay abreast of the most current and most stringent accessibility standards for efficient implementation of an ADA Transition Plan. It is recommended that the agency follow the most stringent technical provisions when alterations and corrective actions are made.

The 2010 ADA Standards do not yet address the scoping and technical provisions for trails, scenic viewing areas, picnic areas, campgrounds, and beaches. The accessibility standards for these features have been

adopted under the Architectural Barriers Act and apply to federal land management agencies such as the National Park Service, the U.S. Fish and Wildlife Service, and the USDA Forest Service. **The ABA Accessibility Standards specific to outdoor developed areas have been referenced in this accessibility assessment as a means to achieve program access.** When accessibility improvements are made to trails, scenic viewing area, picnic areas and beaches, the more stringent of the ABA, ADA or state codes should be utilized. For example, the scoping requirement for picnic areas and the minimum number of accessible picnic tables under the ABA is more stringent (a minimum of 1, 2 or 20%) than the ADA requirement for dining areas (a minimum of 5%). Unfortunately, since the provisions for outdoor developed areas are not part of the ADA accessibility standards yet, public entities are not able to opt to the less stringent standards from the ABA. For example, the ABA standards specific to outdoor developed areas introduce a concept for an “outdoor recreation access route” that connect the accessible features in picnic areas and campgrounds. This outdoor recreation access route allows for a steeper slope, up to 10% for 30 ft. Typically, the maximum slope for an accessible route is up to 5% and anything 5 to 8.33% maximum is a ramp requiring handrails, landings and edge protection. Because the rulemaking on outdoor developed areas is not yet part of the ADA standards adopted and enforced by DOJ, it is not yet permissible for an entity covered by the ADA to use this lesser standard.

# HOW TO USE THIS REPORT AND DATABASE

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The supplemental detail reports for each site follow this section in the appendix. The detail reports, also titled “Accessibility Assessment Conditions Reports,” provide a description of each deficiency, location, recommendation for barrier removal, conceptual projected cost, impervious area that may be affected by the corrective action and digital image. The deficiencies and corresponding corrective actions have been categorized by priorities. The priority definitions are based upon criticality and effect on the disabled visitor’s opportunity to equally participate and benefit from the experience like non-disabled users. The priorities were developed by the project team as follows:

<b>Priorities</b>
<b>Priority 1 – Critical</b>
A Priority 1 is a critical and urgent classification given to those barriers/deficiencies that significantly prohibit people with disabilities from utilizing the program, service or activity to equally participate and benefit from the experience when viewed in its entirety. These locations are likely to have the highest volume of visitor use and be considered integral to the reason people come to the park or facility. Corrective action here is necessary to achieve “Program Access.” In some instances, a safety concern may also be addressed in this category. Examples: <i>The swimming pool lacks a pool lift that is independently operable. The park lacks an accessible route to the sports field, team seating and spectator viewing area. The accessible parking is surfaced with large stone gravel. There is no accessible picnic unit.</i>
<b>Priority 2 – Serious</b>
A Priority 2 is a serious and urgent classification given to those deficiencies that effectually inhibit a person with a disability from utilizing the facility independently. The deficiency is considered a barrier to a significant number of people with disabilities; the location has a high volume of use and is considered a unique feature to the park or facility. A person with a disability may be able to participate in a limited capacity or with some assistance but is still prevented from receiving the full benefit of the program, service or activity. Examples: <i>A section of the asphalt park path has a slope 6 to 12%, changes in level or openings in the surface. The restroom lacks accessible room identification signage. There is a change in level at the door threshold. The lock requires twisting, pinching, or grasping.</i>
<b>Priority 3 – Moderate</b>
A Priority 3 is a moderate classification given to those deficiencies that affect the convenience of accessibility for visitors with disabilities. At least one of these features or elements are already considered accessible somewhere else in the park or facility. Corrective action here would provide greater convenience for users. Example: <i>The trash receptacle is located outside of the accessible route and accessible reach range. The accessible toilet stall lacks a door pull on the interior.</i>
<b>Priority 4 – Minor</b>
A Priority 4 is a minor non-urgent deficiency that would be required to meet the new construction standards should the element undergo alternation or renovation. In most instances, the element is a duplicate and already provided as accessible in another location within the park or facility; or it is considered an area primarily used by employees. Example: <i>The light switch is 52 inches above the finish floor, compliant with the older accessibility standards, but not compliant with the newer 2010 ADA Standards required not to exceed 48 inches.</i>

The detail reports are grouped by open space and then by building. Each grouping is sorted by priority. Thus, all open space recreation areas will be listed at the top of the report and followed by any buildings on site like a visitor center, concession, or restroom. A green dividing line will separate each building and each building is identified with its corresponding asset number. The asset number has been sequentially assigned by the existing Component Number assigned in the Life Cycle Inventory by Park Operations. The detail report components include:

1. Header and Footer
2. Building and asset number
3. Location at the site
4. Solution short description, long description of barrier, and corrective action
5. Priority
6. Conceptual projection cost and note
7. Referenced standard citation
8. Photo
9. Record ID



Holly Park		Assessment Date:	11/14/2021
Montrose Recreation District		Accessibility Assessment Conditions Report	
1	Location	Solution / Description and Recommendation	Priority Cost Estimate
2		<p><b>Parking</b> 3</p> <p><b>Install/raise sign designating accessible parking space with ISA</b> 4</p> <p>There are 52 standard parking spaces and 4 designated accessible parking spaces. The 2 accessible parking spaces at the south side of the park lack signs.</p> <p>For this size parking lot, only 3 accessible parking spaces are required. It is recommended that the 4 accessible parking spaces be maintained and dispersed to serve both the ball field and restroom building at the north side of the park and the playground and sports courts at the south side.</p> <p>At the south accessible parking spaces, install signs designating the accessible parking spaces including the International Symbol of Accessibility. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign.</p> <p>Reference: ADA 502.6            Photo: HollyPark-025            Record #: 1</p>	<p>5 Priority 2 - Serious</p> <p>6 \$800</p>
		<p><b>Playground</b></p> <p><b>Provide accessible play surface</b></p> <p>The play area at the track ride is surfaced with engineered wood fiber. The play area adjacent to the composite play structure is also surfaced with engineered wood fiber that was designed to transition to the poured in place rubber surface. Lack of maintenance of the loose fill surface has resulted in a change in level at the transitions to other surfaces and the clear floor space for accessible play components. The undulation of the surface material exceeds the maximum allowable 6.25% slope for the accessible route to play components and the maximum allowable 2.08% clear floor space at play components.</p> <p>Rake the engineered wood fiber level, replenish the surface material as necessary and compact the surface system to eliminate the undulation. Refer to the manufacturer's recommendations for installation and maintenance to ensure a level, accessible play surface not to exceed 6.25% for the accessible route and 2.08% in the clear floor spaces for accessible play components.</p> <p>Reference: ADA 240, 1008            Photo: HollyPark-026            Record #: 6</p>	<p>Priority 2 - Serious</p> <p>\$3,000</p>

Image 12 Detail of the accessibility assessment conditions report.

Upon receipt of this report, planners, programmers and facility managers are encouraged to review the data and begin analyzing how the findings and recommendations fit into the master plans and programmatic goals for each park or facility. The detail reports should be consulted whenever:

- ✓ Routine maintenance is performed.
- ✓ Capital projects are planned.
- ✓ Corrective actions are implemented per the ADA Transition Plan.

This accessibility assessment should be considered as a conditions assessment, a snapshot in time recording the conditions for visitors with disabilities on that day. Conditions may change due to events such as maintenance, vandalism, and storm damage. Thus, the planning team should always visit the site prior to making corrective actions to verify the present conditions.

The priorities DO NOT dictate the order to which corrective actions should be made. Instead, they are defined to give decision-makers a better understanding of the magnitude by which the barrier prohibits a person with a disability from fully experiencing the program or activity offered at the park or facility. It will be at the discretion of administrators to determine the order by which corrective actions are made.

A fully customizable database has been developed in MS Access to facilitate the management of a dynamic, flexible ADA Transition Plan. The ADA Coordinator will be able to update and maintain the data as corrective actions are prioritized and completed.

Within the database, planners can update deficiencies by assigning the target date, budget cycle and lead department/staff. Planners can differentiate if the project is a capital project or should be submitted as routine maintenance through a work order. Conceptual projection costs can be updated.

The ADA Coordinator can document projects that have been completed or steps that have been taken in

**Update Transition Plan**

DeficiencyID 1 Priority **Priority 2 - Serious** FY Budget Target Date

Property **Holly Park** Lead Dept/Staff

Asset Location **Parking** Capital Project

Solution **Install/raise sign designating accessible parking space with ISA** Submit for Work Order

Deficiency Description: There are 52 standard parking spaces and 4 designated accessible parking spaces. The 2 accessible parking spaces at the south side of the park lack signs.

Recommendation: For this size parking lot, only 3 accessible parking spaces are required. It is recommended that the 4 accessible parking spaces be maintained and dispersed to serve both the ball field and restroom building at the north side of the park and the playground and sports courts at the south side. At the south accessible parking spaces, install signs designating

Transition Planning Note

Cost Estimate **\$800** HollyPark-025

Cost Estimate Note: Estimate to install accessible parking signs x 2.

Corrective Action Complete Completed Date Actual Cost **\$0.00**

In Lieu of Barrier Removal

Description of Corrective Action

*Should a corrective action not be made, please describe the alternative means of access in lieu of barrier removal. [Required for ADA Transition Plan]*

Image 13 The database to update and maintain the ADA Transition Plan.

lieu of barrier removal including relocating a program to an accessible site. The documentation of

scheduled and completed projects can demonstrate the public entity's good faith<sup>14</sup> effort in achieving ADA compliance. The ADA Coordinator can update the following fields:

- Corrective Action Complete
- Completed Date
- Actual Cost
- Description of Corrective Action
- In Lieu of Barrier Removal
- Description of alternative means of access in lieu of barrier removal

Reports can be generated to include upcoming projects and completed projects available for inspection by the public and presented annually to executive leadership.

An effective ADA Transition Plan is a dynamic working document. It provides a framework and structure for barrier removal; yet it is flexible and fluid to meet the unique needs of the community as public input is gathered, challenges arise, and new opportunities are presented. Rather than simply provide a static written report, an agile database was designed to aid the City in ADA Transition Planning. If properly utilized and maintained, it can facilitate planning for annual accessibility projects, track progress, record decisions in lieu of barrier removal and provide the most up to date information for public inquiries regarding accessibility improvements at a particular site.

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<sup>14</sup> The general presumption under contract law that the entity will deal honestly and fairly. The Title II and Title III Technical Assistance Manuals describe documentation of planned barrier removal and policy modifications as evidence of good faith.

## KEY FINDINGS AND RECOMMENDATIONS

Approximately 274 deficiencies were identified within the 5 parks and recreation facilities that were assessed. The deficiencies were analyzed and recommendations for corrective actions were developed to achieve compliance with the accessibility standards and the “program access” requirement of Title II. The 10 most frequently cited recommendations for improving access for visitors with disabilities were:

Most Frequently Cited Recommendations	#
1. Adjust the opening force for interior doors	27
2. Raise/lower or relocate paper towel dispenser/hand dryer	23
3. Install/remount grab bars	17
4. Raise/lower or relocate soap dispenser	12
5. Install coat hook within reach range	11
6. Install/remount restroom identification signage with braille and raised characters	10
7. Lower mirror or provide a full-length mirror	9
Modify existing interior route/ramp	9
8. Adjust door opening force and/or evaluate for installation of automatic/power-assisted door system (exterior doors)	8
9. Modify clear floor space at fixtures	7
Provide integrated accessible seating at spectator viewing area	7
Modify existing pathway	7
10. Install/reconfigure for accessible toilet compartment	5
Add/replace existing drinking fountain with high-low unit	5

Broad conceptual projection costs<sup>15</sup> were assigned based on the *RS Means ADA Compliance Pricing Guide* and input from the project team. The projected cost for individual corrective actions ranges from relocating a paper towel dispenser that protrudes into the circulation route at \$50 to remodeling a restroom to include a wheelchair accessible toilet compartment at \$15,000. Some projected costs have been reserved for corrective actions that require additional planning and design decisions and/or may be considered capital improvements.

#	Deficiencies & Recommended Corrective Actions	Estimate*
86	Priority 1 – Critical	\$177,750
102	Priority 2 – Serious	\$189,760
79	Priority 3 – Moderate	\$ 44,885
7	Priority 4 – Minor	\$ 1,030

*\*Estimates are broad-based conceptual estimates and likely to change as more detailed decisions are made addressing construction techniques, materials and finishes.*

<sup>15</sup> Design services were estimated when new paths would exceed 250 linear feet to enable planners to address the opportunity for the path to be used as a recreational shared use path for pedestrians and bicyclists. In some instances, projected costs for design services may have been split across several corrective actions that need to be addressed at the same time.



#	Deficiencies & Estimated Costs for Corrective Actions by Site	Estimate*
24	Holly Park	\$ 29,340
58	McNeil Fields	\$ 135,958
92	Montrose Community Recreation Center	\$ 92,710
69	Montrose Field House	\$ 100,260
31	Ute Park	\$ 55,130

*\*Estimates are broad-based conceptual estimates and likely to change as more detailed decisions are made addressing construction techniques, materials and finishes.*

When a comprehensive accessibility assessment is conducted for an organization at this scale, certain reoccurring issues begin to emerge. Gaining an understanding of these common issues can help clarify “the big picture” of access across multiple sites and direct resources for transition planning. The following items were identified as common themes that affect the experience of a person with a disability to visit, fully participate and enjoy the benefits of programs, services and activities within the Montrose Recreation District parks and facilities.

## 1. ADA TRANSITION PLANNING

An ADA Transition Plan should be a dynamic working document that continues to evolve based on the needs of the community and the resources available to the public entity.

**Recommended:** Conduct an interactive review of the assessment data specific to program locations with program directors/coordinators and planners. Identify program locations that are integral to the delivery of the program and update the schedule of corrective actions within the ADA Transition Plan.

## 2. NEW CONSTRUCTION AND ALTERATIONS TO EXISTING FACILITIES

The Montrose Community Recreation Center (CRC) is the District’s premiere facility. Funded by a community referendum, the CRC serves as a gathering place for families, groups, and individuals interested in improving their overall health and wellness. The CRC celebrated its fifth anniversary this summer and sports some notable examples of universal design including:

- ✓ Additional accessible parking spaces and curb-less access aisles.
- ✓ Power-assisted doors at the main entrance.
- ✓ A multi-height reception counter to serve customers and employees.
- ✓ High-low drinking fountains with bottle fillers within the reach range.
- ✓ Nine accessible cabanas with toilets, lavatories, showers, and dressing benches.
- ✓ A zero-depth entry leisure pool.
- ✓ An assigned swimming pool lift for each pool.
- ✓ Elevator.
- ✓ Fitness track.
- ✓ Accessible route to fitness equipment.

Unfortunately, the accessibility assessment identified 92 deficiencies totaling more than \$92,000 in estimated corrective actions where the component was not compliant with the current accessibility standards. Some of the most prominent barriers include:

- ✗ The passenger loading zone at the front entrance lacks a curb cut. The nearest accessible points of entry to the raised sidewalk are at the accessible parking spaces.
- ✗ There are 21 interior doors with opening force exceeding 5 lbs.
- ✗ The sitting area with café tables lacks accessible units with knee and toe clearance.

- ✘ The raised counter that serves as a spectator viewing area of the basketball courts lacks a lower section for wheelchair seating.
- ✘ The swimming pool lifts are missing parts including the controls for independent operation.
- ✘ Six out of the nine cabanas have drains resulting in excessive slopes from 3.7% to 6.9% at fixtures when the maximum allowable slope at the clear floor space is 2.08%.
- ✘ The interior ramp from the lobby to the gym corridor has a running slope up to 8.9% for a 5-10 ft distance, exceeding the maximum allowable slope of 8.33%.

Some of these issues may have been identified either during the plan review process or inspection during construction. The volume and cost of the corrective actions on a new facility illustrate the importance of including accessibility as part of both processes.

**Recommended:** Assign accessibility and universal design as essential criteria in the design process to ensure equitable access for all park visitors.

**Recommended:** Utilize the expertise of the ADA Coordinator, the accessibility management team, and building code officials/inspectors to review the initial plans for compliance with the accessibility standards.

**Recommended:** Equip the ADA Coordinator, the accessibility management team, and project supervisors with evaluation tools to monitor and confirm compliance, including a tape measure, a door pressure gauge, and a 2 ft. digital level.

**Recommended:** Adopt a process and clarify roles for all projects, in-house and by contractors, to be inspected for compliance with the 2010 ADA Standards and other guidelines adopted by the City and County. If it is not feasible for staff to fulfill this responsibility, consider using an independent contractor to perform final project inspections for ADA compliance.

**Recommended:** Adopt a procedure for the construction phase to conduct periodic inspections confirming the project is being built to plan and in compliance with the accessibility standards.

**Recommended:** Adopt a procedure to conduct a final inspection on all projects, capital improvements, and repairs for compliance with the accessibility standards. In instances where elements do not comply with the accessibility standards, the contractors should be required to correct the element prior to the District receiving and signing off on the completed project.

### 3. DOORS

Under the ADA, the maximum opening force for interior doors on the accessible route is 5 lbs. There were 21 interior doors at the CRC and another 6 at the Field House with opening force exceeding 5 lbs. The opening force for exterior doors is not specified in the 2010 ADA Standards. Rather, the provision refers the building owner to other model codes, along with state and local jurisdictions. The Colorado building code references the IBC and states a maximum of 15 lbs for exterior and fire exit doors. The state reference does not preclude the building owner from the ADA requirement of an accessible route connecting the site arrival point to the accessible features within the site in order to achieve “program access.” In instances where the closers cannot be adjusted so as not to exceed the maximum range of the standard, the door should be evaluated for a new closer, lighter door, or installation of an automatic or power assisted door system.

The double doors from the cabanas to the pool at the CRC were the most discussed issue of physical access during the focus group meetings. Many of the individuals were daily users of the facility and noted the heavy opening force was a barrier to accessing the pool. They also noted that the aquatic wheelchair is a bariatric-sized wheelchair and the extra width requires both doors to be opened in order to pass through. A doorbell had been installed on the cabana side of the doors, but community members stated it did not

work or could not be heard in the lifeguard office to allow for a timely response for staff to assist opening the door. There is a perception among staff that a power-assisted door system would enable children unsupervised to enter the pool. This explanation was not well received by some community members.

**Recommended:** Utilize a task group of staff, community members with disabilities that use the CRC, and the original architecture firm to identify and implement an acceptable solution for an accessible route from the cabanas to the pool area.

**Recommended:** Adopt a preventative maintenance schedule to measure and adjust the opening force for all doors. Interior doors with closers should not exceed an opening force of 5 lbs. Exterior doors have been recommended for evaluation as to whether the door closers can be adjusted to alleviate the opening force. Many state and local jurisdictions have adopted a more stringent technical provision of 5-8 lbs opening force for exterior doors. Thus, this emerging practice was cited as a target range to adjust the door closers. If this is not feasible, the installation of an automatic door or power-assisted door system is recommended. Some facilities may have multiple public entrances. In these situations, the 2010 ADA Standards call for 60% of those entrances to be accessible. Therefore, it may be necessary to install automatic or power assisted doors at multiple entrances for a single facility. This may be a phased approach outlined in the ADA Transition Plan and beginning with the main or most frequently used buildings/entrances.

## 4. SWIMMING POOLS

The Spectrum swimming pool lift that have been installed at the CRC and the outdoor pool at the Field House lack the required footrest and control for independent unassisted operation from both the deck and water level. The units are also missing the optional armrests. Input from the community focus groups concluded that if corrective actions need to be scheduled over multiple budget cycles, the first priority would be the wellness pool at the CRC.

**Recommended:** Consult with the pool lift manufacturer to install replacement parts including the footrest, folding armrests, and handheld control that can clip to the armrest. If the parts cannot be replaced due to the age of the units, schedule the pool lifts for replacement.

## 5. SPORTS FIELDS

There were sports fields, such as baseball diamonds, batting cages, and multipurpose fields, that lack accessible routes connecting the main paths/circulation routes for the park or facility to the field of play, team seating and spectator viewing areas. In many instances, users must leave the main path and traverse through grass to get to the sports fields or team seating area. Where accessible routes are provided, instances were noted with changes in level at transitions between the accessible route and the sport field surface. Spectator viewing areas with bleachers may lack connection to an accessible route and space for wheelchair seating.

The ball fields at Ute Park have a 2-story press box/scorer booth that lacks vertical access. The lack of vertical access poses “program access” issues for people with mobility impairments, such as employees, volunteers, coaches, officials, visitors, and others that may not be able to climb the stairs for functions within the elevated rooms. It may be considered impractical to install an elevator or limited use/limited application lift (LULA) in the structures.

**Recommended:** Provide an accessible route to each sports field, team seating area and spectator viewing area. Options might include either permanent paved paths or the installation of temporary path systems.

Factors influencing the prioritization of barrier removal may include the type of play, whether it be organized league play, tournaments, or pick-up games with picnic shelter rentals.

**Recommended:** Provide wheelchair accessible seating and companion seating at each spectator viewing area. This may require the addition of an accessible route and widening of an existing concrete or asphalt pad to include the clear floor spaces for wheelchair seating and approach/turning space. When the bleachers are replaced, select a design that accommodates wheelchair accessible seating with adjacent shoulder to shoulder companion seating.

**Recommended:** Implement a procedure to immediately relocate the functions for the upper floor of the press box/scorer building to the ground floor upon request of an individual with a disability who may be an employee, volunteer, coach, official, visitor or other. This may require the acquisition or installation of new technology to remotely operate the score board or use the public address (PA) system from the ground floor. All new construction spaces purposed to serve as a press box/scorer building should be designed for an accessible route and accessible entrance, especially since the ADA "elevator exemption" does not apply to Title II public entities.

## 6. PLAYGROUNDS

District playgrounds are surfaced with engineered wood fiber (EWF). The playgrounds at Holly Park, McNeil Fields, and the CRC lack an accessible point of entry into the play surface. Most often the undulation of the EWF surface material exceeds the maximum allowable 6.25% slope for the accessible route to play components. It is critical that EWF be installed and maintained following the recommended installation technique of the International Playground Equipment Manufacturers Association (IPEMA) to ensure an accessible route with a slope less than 6.25% and clear floor space at accessible play components not to exceed a slope of 2.08% in all directions. EWF requires frequent and consistent maintenance such as raking the surface level, replenishment of the surface material and compaction for both accessibility and impact attenuation. It is likely the frequency by which the EWF is replenished and compacted must increase in order to provide playground locations that are accessible during all days/hours the sites are open for public use.

**Recommended:** Adopt a new design for the point of entry into the play area, preferably utilizing a concrete blended transition with a running slope less than 5%, but not to exceed 6.25%.

**Recommended:** Adopt a more frequent maintenance schedule for EWF surfaced playgrounds including top dressing and compacting the surface at the beginning of each spring. Conduct seasonal safety inspections that also factor in accessibility issues such that site improvements complement both safety and accessibility.

## 7. PICNIC FACILITIES: PICNIC TABLES, GRILLS, AND TRASH RECEPTACLES

Opportunities for picnicking are available at all MRD sites. Most commonly cited deficiencies were lack of accessible picnic tables; lack of clear ground space around all usable sides of the picnic table; lack of minimum clear width at the wheelchair seating locations; and grills with cooking surfaces too high or lack of required minimum clear width around the usable sides of the grill. Very few open areas with picnic tables and grills were found to be accessible and located on an accessible route.

**Recommended:** Utilize the ABA accessibility standards as guidance to designate accessible picnic areas and achieve program access at each recreation site. While the 2010 ADA Standards do not specifically address

access to picnic areas yet, the ABA accessibility standards for outdoor developed areas should be referenced to achieve program access. Accessible picnic units should be dispersed throughout each park. Existing sites should be selected and prioritized to be made accessible based upon location, popularity amongst visitors, and proximity to other unique features within the park. As picnic units are made accessible, they should be noted on maps and the park website.

**Recommended:** Ensure that park maintenance personnel are well-trained on the accessibility standards. Staff should be proficient on the placement of picnic tables on the accessible routes and the need to maintain clear widths around the usable sides; heights for the cooking surfaces on fire rings and grills; and locations of trash receptacles so that they are within the reach range but do not obstruct other outdoor constructed features.

## 8. SCENIC VIEWING AREAS AND BENCHES

Scenic viewing areas and benches are located throughout parks. The ABA standards specific to outdoor developed areas should be referenced as a best practice for the installation of accessible benches. The advisory note recommends benches with back supports and at least one arm rests. Clear ground space should be provided adjacent to the bench, 36 by 48 inches positioned near the bench with one side of the space adjoining an outdoor recreation access route or trail, as applicable. The clear ground space may not overlap the outdoor recreation access route or trail or another clear ground space.

**Recommended:** As benches are installed along park paths, trails, picnic areas, scenic viewing areas, playgrounds, and other outdoor developed areas, it is recommended they be installed with adjacent clear ground space for shoulder-to-shoulder companion wheelchair seating as standard operating practice. The addition of the clear ground space adjacent to all newly installed or resurfaced paths creates access for strollers, coolers, tackle boxes, bicycles and other gear. As benches are replaced, it is recommended that a minimum 25-50% of new benches include a back support and at least one armrest. It is understood that benches come in all shapes and sizes. This approach gives planners the flexibility to select multiple designs or stick with one standard design.

**Recommended:** Where scenic viewing areas are located at decks, platforms or overlooks, ensure the prominent feature can be viewed from a seated position that is not obstructed by the guardrail. The viewing space must be clear of obstructions 32 to 51 inches above the ground. This may require the use of different materials at locations with guardrails such as the use of steel cable railing systems or railings lowered to 32 inches at the viewing space. Where viewing scopes are provided, a minimum of 20% should be accessible, installed on the accessible route with knee clearance and the eyepiece 43 to 51 inches above the ground surface.

## 9. VISITOR INFORMATION, ORIENTATION, AND WAYFINDING

It often takes people with disabilities, family members, and friends longer to plan an outing as they need to collect information on the accessibility of a site, location of accessible parking, accessible routes, availability of restrooms, water, sitting areas, service animal relief areas, auxiliary aids, and other features. There may be limited information on the District website and in the seasonal guidebook regarding the accessibility of parks and facilities.

At sites, there is limited information posted as regulatory signs, maps, and information kiosks to orient visitors to the location of features and amenities. Understanding and navigating a large space like a park can be challenging for people with visual and cognitive impairments. In large parks with multiple amenities, tactile maps and signs provide orientation and wayfinding cues. A tactile map can help a person with a visual impairment understand the site and the location of features like picnic shelters, restrooms,

playgrounds, ball fields, and fishing areas. The map can also provide information on the accessible routes and features for people with mobility impairments. The accessibility standards do not specifically address visitor orientation or wayfinding. Thus, we must look to the best practices in universal design, visitor use, and parks for guidance.

**Recommended:** Adopt a sign plan and style guides for informational kiosks, exterior directional signs, and roadside signs to provide orientation and wayfinding information to park visitors. Consider the consistent use of colors, textures, and symbols to convey locations of prominent park features and amenities. A tactile map outlining the park boundaries and prominent features is helpful for orientation to people with low vision or no vision. Consistent use of colors and symbols for ball fields, playgrounds, concessions, picnic areas and restrooms is helpful for people with cognitive impairments.

**Recommended:** In mid- to large size parks, install redundant park maps at information kiosks so visitors can orientate to their new location and in relation to other park features.

**Recommended:** Utilize a web page for each park and on-site information kiosk to provide visitors with information on accessibility features. At sites where features are not accessible, make recommendations to other parks that provide accessible features.

## 10. TRAILS AND SHARED USE PATHS

The Uncompahgre Riverway Trail passes along the border of Ute Park and McNeil Fields. This is a shared use paths as it has been designed for pedestrian and bicycle uses. There is no trailhead information at these sites that may serve as points of entry to the shared use path. Thus, there is no information on the trail distance, average and maximum grades, trail width, or prominent features. At this time, the District does not maintain any designated pedestrian trails for the express purpose of recreational hiking.

**Recommended:** Collaborate with the City, County and other agencies responsible for sections of the shared use path to develop a trailhead sign standard for the points of entry to shared use paths that also include objective information on the path including the length of the path or path segment; surface type; average and minimum tread width; average and maximum running slope; average and maximum cross slope; and location of accessible features such as restrooms.

**Recommended:** If and when the District plans to install recreational hiking trails, adopt a design standard for accessible trails so that, when viewed in its entirety, the accessible trails are representative of the cultural, historic and geographic significance of the site and connect to prominent features of the site. Essentially, the accessible trail should tell the story as to “why” the site is important.

## ACTION PLANNING

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Successful inclusion of people with disabilities starts with a commitment from the top, quality customer service on the frontline and a thorough understanding of the standards, regulations, and emerging best practices. An effective accessibility management/compliance program utilizes a team approach that includes representation of key decision-makers. Simply, ADA compliance is not just one person's, the ADA Coordinator's job, it must be everyone's responsibility. Leadership for the Montrose Recreation District has made an incredible commitment to initiate this project, build foundational knowledge of ADA compliance among full-time staff, and receive public input to better serve people with disabilities in all aspects of recreation programming. Upon receiving the recommendations set herein, staff will commence with true heavy lifting to implement an ADA Action Plan. Tasks include both a micro and macro approach to prioritize specific barriers, procedures, and systems. A comprehensive approach by the accessibility management team will enable the MRD to grow recreation opportunities that are welcoming and inclusive of people with disabilities.

## RESOURCES

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For questions about the policy review or technical assistance on the ADA regulations under Title II, the accessibility standards or best practices of universal design, contact:

Jennifer Skulski, Principal  
Skulski Consulting LLC  
(317) 408-4424  
[jennifer@skulskiconsulting.com](mailto:jennifer@skulskiconsulting.com)

U.S. Department of Justice  
(800) 514-0301  
[www.ada.gov](http://www.ada.gov)

U.S. Access Board  
(800) 872-2253  
[www.access-board.gov](http://www.access-board.gov)

Job Accommodation Network (JAN)  
(800) 526-7234  
[www.askjan.org](http://www.askjan.org)

## APPENDIX – COMMUNITY FOCUS GROUPS

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Two community focus groups were held in July 2022 to gather input on the accessibility of programs, services, activities, facilities, and parks offered by the Montrose Recreation District. The following comments were noted among the facilitated discussions with people with disabilities, family members, and disability advocates.

### ***What do you like about the accessibility of MRD programs and facilities?***

- Everything about the pool, community center is very well equipped.
- Zero entry into pool, and ramp into pool.
- Pool lifts.
- Therapy equipment used in pool.
- Accessibility of CRC.
- Auto door at entrance of CRC.
- Holly Park improvements.
- You can tell how much time and effort went into the design of the CRC.
- "You should be able to find something to do at the CRC."
- Able to go to a park to walk safely as opposed to using city sidewalks.
- The walking track at CRC and being able to hold onto a railing.
- Handcycle that is wheelchair accessible in fitness area of CRC.
- Chair yoga - awesome program for seniors.
- Rec does good job partnering with other organizations.
- The swimming pool and physical therapy program for the pools.
- The staff have been exceptional, skilled, and qualified, Jack the head lifeguard has been awesome.
- Onset of disability has been a more helpful and pleasant experience due to staff.
- Clean facility.
- Collaboration with Telluride adaptive to bring equipment into facility for programming.
- Family cabanas.
- Cabana #1 is the perfect roll in size because it doesn't have a folding bench.

### ***What challenges/barriers do you experience specific to access for people with disabilities at MRD programs and facilities?***

- ➡ Pool doors, one ambulatory person has been caught. There should be an automatic door, no excuse should be used about children being able to get out the door. Another woman with MS using wheelchair cannot push door open to get out of pool.
- ➡ Need at least one cabana that has an accessible door. Can the rubber door stoppers at bottom of the door be changed to a magnetic stopper at the lever or top of the door?
- ➡ Doorbell at pool door from the cabanas is not conveniently located and cannot be heard by lifeguards.
- ➡ There is no curb cut for the loading zone at the CRC.
- ➡ Maybe use a key fob to only open some doors automatically.
- ➡ Non-disabled patrons using the accessible cabanas, instead of using the main lockers.
- ➡ Not enough curb cuts at McNeil Fields.
- ➡ There is no ramp to at least the first level of the splash play composite in the pool.
- ➡ Adults can only get to the first level of the soft play area to interact with their child.
- ➡ Someone forgot to turn the pool lift off and the battery was exhausted when it needed to be used.



- The pool lift doesn't lift high enough, the batteries are not always charged.
- Group agreed that the therapy pool lift replacement would be the higher priority if not all lifts were replaced at the same time.
- The aquatic pool chair does not allow for a smooth transition because of the rough PVC post that is exposed when the arm rest is removed. The pool wheelchair is bariatric size so both pool doors need to be opened.
- Pool doors need to have an automatic door opener.
- Cabana #5 has a bigger bench that reduces the turning space.
- The elevator is toward the back of the building instead of upfront and a lot of people don't know that it is available.
- There aren't inclusive programs like soccer, the program is based on volunteers' willingness to include children with disabilities.
- Parent expectation that a para-aid be available to her child for camp.
- Orientation to rec center is through an able-bodied mindset.
- There is no central coordination of disability-service providers that come together to network at a city/county level.

***What accessibility improvements are needed, if any, at any park or facility?***

- The POOL LIFTS need replacement.
- Possibly add signage about reserved for families and special needs at cabanas or orientation during the new member tour.
- Possibly increase the number of wider van accessible parking spaces or restriping to universal parking spaces, but without reducing the total number of parking spaces.

***What accessibility features would be included in your ideal park, facility, or program?***

- Would like to see adaptive equipment for climbing wall.
- Lower dressing benches.
- Wheelchair swing, the Landscape Structures We-Go-Swing at playgrounds.
- Specialized life jackets for larger students, and adaptive features, wider variety.
- Signs that lifeguards could use to communicate with deaf students.

***What have you seen elsewhere that you would like to see here?***

- Would like a playground like the one at Grand Junction, John Layne playground - poured in place, all contained by fence, multiple accessible pieces, wheelchair swings
- Wheatridge Community Center

***What information do you receive on accessibility for people with disabilities, is it easy to find, and communicated well?***

- Welcome statement at front of activity guide.
- Would like a list of accessibility features for each site.
- Would like advance information to prepare families to visit CRC.

***What organizations should the district extend its outreach to maximize resource and collaborative opportunities?***

- Young moms, MOPs group
- Community Options - Elaine

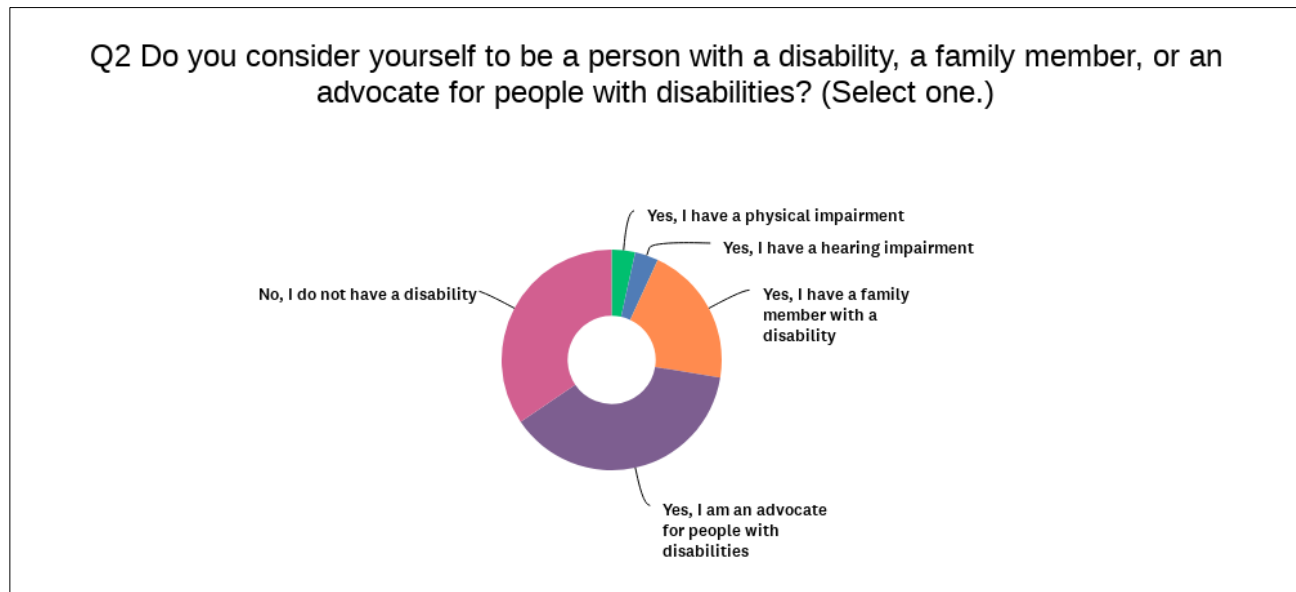
- Over the Rainbow behavior consulting
- Colorado Autism
- Hospital therapy program - collaborative training, disability services how to transfer safely
- School district
- Special Olympics and trend to move to Unified Sports
- Tri-County
- DHS - medicaid waivers program coordinator - Kendra
- Telluride Adaptive
- Discoverability in Grand Junction

***Is there anything else you would like us to know about accessibility and inclusion for people with disabilities specific to the Recreation District?***

- The availability of local sign language interpreters through school district.
- Make sure that the carpets are taped down. Someone tripped over the carpet.
- The fact that we having this discussion is very progressive and informative.
- This community engagement should be a gold star standard for bringing people together.
- Making sure people know scholarships are available if they qualify.
- I am very proud of the Montrose Recreation District for bringing people together to have this conversation.

## APPENDIX – ONLINE COMMUNITY SURVEY

An online community survey was made available for public input during the month of August 2022. The purpose of this survey was to assess the perceptions of residents with disabilities and advocates regarding compliance with the ADA and inclusion in programs and facilities. An invitation to participate in the survey was e-mailed to individual constituents and service providers identified with possible interests in disability issues and those who could not attend the in-person focus groups. Approximately 29 responses were received. All but 2 of the respondents lived within the City of Montrose. Survey respondents were asked to select only one statement that most closely represented their association with disability: 11 identified as being an advocate for people with disabilities, 6 identified as having a family member with a disability, one identified as having a physical impairment, and one identified as having a hearing impairment. The remaining 10 respondents identified as not having a disability.



Respondents were asked to describe their knowledge of the Americans with Disabilities Act. Approximately 75% of the respondents identified as having a basic, moderate, or advanced knowledge of the ADA. When asked about use of parks and facilities managed by the Montrose Recreation District, 62% used the Montrose Community Recreation Center, while 31% had used McNeil Fields, and 28% had used the Field House, Holly Park, and Ute Park. 28% of the respondents had not used any MRD park or facility within the last year. More specifically, survey participants were asked about participation in MRD programs. Approximately 25 of the 29 respondents had participated in MRD programs within the last year. Fitness programs were the most common for participation (60%), followed by aquatics (52%), adult sports (16%), youth sports (12%), 50+ activities (12%), and enrichment camp (8%).

When participating in a MRD program, service, or activity, 46% of respondents reported using the accessible features of the facility and 21% reported using extra assistance. When asked, “What do you or your family member with a disability like about the accessibility of Montrose Recreation District programs, parks, and facilities for people with disabilities?” survey participants stated:

- CRC pool is accessible, FH is not as accessible, Holly Park could be more accessible, McNeil and Ute need to be more accessible.

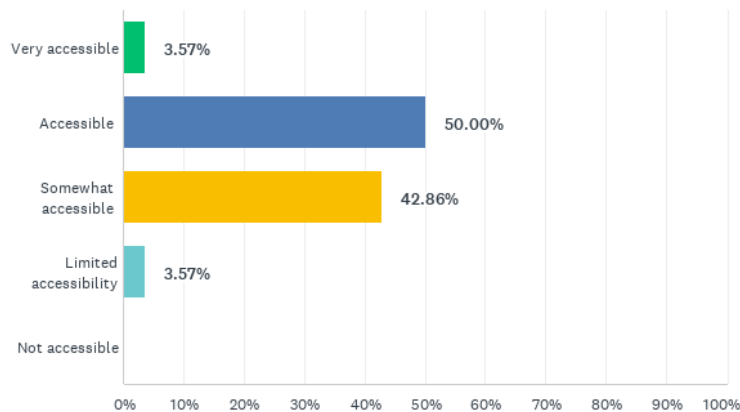
- We feel it is very mixed. The pool is very accessible. However there are very few sport groups specifically for ppl with disabilities. And the none of the parks have inclusive play equipment for children that use ambulatory aides or wheelchairs.
- Most of them are well maintained and generally accessible. Staff is usually friendly and helpful.
- Handicapped parking
- ADA friendly
- Like the automatic doors into/out of CRC.
- Multiple opportunities for individuals with differing abilities (eg chair yoga)
- Ramps, automatic doors, friendly and helpful staff
- Most new spaces have already included a lot of ADA compliant amenities
- Great access to the pool.
- People
- Availability of assistance
- Easy access
- Basic accessibility. Could provide more accessibility.
- Automatic doors, ADA restrooms and shower rooms. Ramp in the pool
- We like that there are some decent progress [programs?] for people that require assistance
- Some of your programs are great for persons with disabilities - both water classes and land classes.
- Accessible parking, pool lift, elevator

Survey participants were also asked “What challenges/barriers do you experience specific to access for people with disabilities at Montrose Recreation District programs, parks, and facilities?” The responses include:

- Lack of programs and services that are accessible.
- Attention is focused on younger people. The facilities are great for older people if facility aids work. The ADA women's shower has been broke which is a great risk to older people or people with disabilities - they need the grab bars in the handicap stall. Perhaps grab bars could be installed in more shower stalls in the event that one is out of service.
- The equipment is not friendly for children with disabilities. The grounds to the playground are difficult to access also. It's very difficult for children, or even parents with disabilities, to access all of the play equipment and play areas. They either have to go across grass, gravel, or wood chips.
- Clarify - physical access is good. Inclusivity in programs for youth needs work.
- Like the handicap access in parks and facilities, elevator in Rec Center and Field House. Ramps at River Bottom Park are great.
- As with all fitness facilities, the low impact classes are all during the business day (aimed I guess at senior citizens who aren't working) which means that those of us who work but need low impact/modified classes/disability/arthritis/joint friendly classes can't participate. Additionally, it doesn't seem or is advertised that any of your personal trainers have specific knowledge and experience dealing with people who have physical limitations.
- Lack of electronic, door opener accessing the pool and aquatic center at the Montrose Rec Center as well as lifts in to the pool that do not go high enough and feel unstable for a larger person
- Heavy doors into & out of pool area near cabanas, hindering ability to get to this area if using an assistive device of any kind.
- Distance of elevator from entrance to the Montrose Recreation Center is a complaint which I have heard often.

- I don't know.
- Heavy doors, limited parking
- Long walk in from the parking lot and inside the building to get to the locker rooms.
- Wheelchair access at parks is difficult.
- Spanish language.
- Education and training!
- Is help available to help someone who is sight impaired to get upstairs?
- There are not enough programs that allow kids with developmental delays to participate without bringing their own para.
- Getting from the car to my activity in the CRC can be a challenge. This is a high energy place and moving slow means I am often in the way.

Q10 Overall, how would you rate the accessibility of Montrose Recreation District programs, services, parks, and facilities for people with disabilities?



Survey participants were then asked to rate the accessibility of MRD programs, services, parks, and facilities for people with disabilities on a 5-point scale of very accessible to not accessible. Of the 28 respondents, 93% found the MRD programs, services, parks, and facilities to be either accessible or somewhat accessible for people with disabilities.

Finally, survey participants were asked “How could the Montrose Recreation District improve access for people with disabilities?”

- Build new sidewalks with accessibility in mind. More accessible trails, and programs for kids and adults with disabilities.
- For special events, think specifically about what elderly or disabled people might need. The elderly love their rec center and want to use it. They also help pay for it.
- Add sidewalks to the equipment. Start adding equipment that is easier for children to use, ie platform swings, adaptive swing seats, etc. Also, sports activities specifically for disabled. Also, training for climbing wall staff so that people with disabilities can feel comfortable using the wall without having to wait for a special day.
- Step up the trail and sidewalk maintenance. Make sure they are wide enough for at least two wheelchairs side by side."

- It would be nice to have a private studio room with a table to work with personal training clients who cannot get down to the floor and back up again. Great access and inclusion at the rec center.
- Install electric doors to access the pool and upgrade the 2 lifts into the therapy and lap pool, as well as install one for the leisure pool.
- Use of push button opening to & from the pool area near the cabanas at CRC.
- Additional opportunities for accessible transportation.
- Continue to update facilities and spaces with current ADA guidelines and exceed those guidelines.
- Specific parking for rehab patients only very close to building.
- Need to update things.
- Need easier handicap access to restrooms at the parks.
- Spanish signs.
- ADA designs moving forward.
- More equipment on the main level of the rec center.
- Bathrooms at Ute park are not accessible.