

Appendix 4
Analysis of Existing
Policies and Procedures

Missing Policies & Procedure	
Lack of grievance process organization-wide & departmental	
Lack of ADA accessible website organization-wide and for any departments with individual websites	
Lack of alternate forms of communication via social media outlets*	
Lack of ADA training; Reference each department for unique recommendations.	
Lack of Notice of Compliance	
Lack of emergency evacuation plan	
Lack of policy for Alternative Formats of Communications	
Lack of policy for service animals	
Lack of procedures to address architectural barriers in facilities	
Lack of procedure for public meetings	
Lack of traffic control plan standards for maintaining access during construction	
Lack of ADA Specific committee, task force, and/or citizen advisory group	Recommend creation of a group, however, not required

Missing Policies & Procedure	
Lack of vendor list for departments to pull from for interpretation, captioning, software products, etc.	Recommend creation of approved vendor list by ADA coordinator
Lack of language within contracts and/or lack of existence of contracts	Title II entities such as, state and local governments have the obligation to ensure that contractors and third party vendors provide services in an accessible manner and don't discriminate on the basis of disability. By contracting with Title II entities, the responsibilities of these contractors and third party vendors rise to the higher standards of Title II organizations. Additionally, if a complaint or lawsuit is filed, the state or local government would also be in the line of fire, due to the contractual relationship.
Lack of reasonable accommodation policy	Recommend at a minimum to include the following which is not all inclusive:
	Definitions of key elements according to Title I: Person with a disability, reasonable accommodation, undue hardship, direct threat, interactive process
	Roles and responsibilities of both employer and employee
	Accommodations at the Application and Interview Processes
	Accommodations for Employees
	Denying an accommodation
	Timelines for process



Analysis of Policies & Procedures

Summary of Findings for Organization-Wide Policies

Missing Policies & Procedure	
Appeals	
Request for Reasonable Accommodation Form	
Medical Information Request Form	
Establish a budget	



Analysis of Policies & Procedures

BREC's Baton Rouge Zoo

Document Title	Comments
Lack of ADA training	Ensure training is provided.
Assistance animals policy	Recommended training includes: reasonable accommodations, ADA basics, training for volunteers and seasonal staff, understanding the technical standards, & technology and the ADA.
Site visits include Keeper Chats, Wildlife Safari Theater, Safari Post Gift Shop	Revise policy to ensure ADA compliance including definitions, clear step-by-step direction for staff and allowance for safety of both zoo and service animals. Ensure Notice of Compliance and process for alternative forms of communication. Ensure routes for the tour are physically accessible. See Self-Evaluation Report for specific violations.
Holiday Camp, Summer Camp	Ensure Notice of Compliance and process for alternative forms of communication. Ensure routes for the tour are physically accessible. See Self-Evaluation Report for specific violations.
Zoo and Me Program	Ensure Notice of Compliance and process for alternative forms of communication. Ensure routes for the tour are physically accessible. See Self-Evaluation Report for specific violations.
Volunteers working on Zoo programs	Ensure process for reasonable accommodations for volunteer assignments/ activities. Ensure proper ADA training be provided to volunteers.
Daytime Zoo Facility Rental Contract	Consider including a process for alternative forms of communication to be the responsibility of the Zoo or of the Renters within agreements. Ensure routes for the tour are physically accessible. See Self-Evaluation Report for specific violations.

The term *accessible* means ADA compliant and ADA accessible.



Analysis of Policies & Procedures

BREC's Baton Rouge Zoo

Document Title	Comments
Education Building Rental Contract	<p>Process for alternative forms of communication including ASL as renters responsibility.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
Evening Facility Rental Contract	<p>Process for alternative forms of communication as Renters responsibility.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
Birthday Party Registration	<p>If BREC sponsored, ensure Notice of Compliance and process for alternative forms of communication.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
Zoo Mobile	<p>Recommend development of a contract to include ADA compliance language.</p>
	<p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
	<p>Ensure lines of sight for people with disabilities.</p>
	<p>Process for alternative forms of communication as Renters responsibility.</p>



Analysis of Policies & Procedures

Golf Department

Document Title	Comments
Lack of ADA training	Recommended training includes: reasonable accommodations, ADA basics, training for volunteers and seasonal staff, & technology and the ADA
BREC Event Contract	Recommend to add ADA Reasonable Modification section in contract.
First Swing, Full Swing For Public/ For Seniors / For Intermediate Players	Ensure Notice of Compliance and process for alternative forms of communication. Ensure physically accessible. See Self-Evaluation Report for specific violations.
Santa Maria Private Event Contract	Process for alternative forms of communication as Renters responsibility. Ensure physically accessible. See Self-Evaluation Report for specific violations.
Chapter 1C: Electric Golf Cars, Pull Carts, and ADA Protocol	Describe the process or requirements to show "an ADA recognized or medically documented disability". Provide notice of availability of carts on website and at courses. Lack of policy to include a reasonable preferred timeline for requests for ADA golf carts due to the need to relocate.
Policy for Carts to Remain on Path	Verbal policy exists to not allow golf carts off the path when wet. Recommend formalizing this policy. Recommend developing a stance on if modifying this policy would be a reasonable modification or an undue burden or fundamental alteration.
Rental Agreements-Santa Maria example	Lack of language regarding ADA Compliance.
Tournament Contract	Lack of language regarding ADA Compliance.

Document Title	Comments
<p>Site Visits incl live animal enclosures, photographic displays, special exhibits, interactive games & reading in Bird Lounge & Pollywog Pond.</p>	<p>Ensure Notice of Compliance and process for alternative forms of communication.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
<p>Site visit: gift shop, gravel trails, and boardwalks available during operating hours.</p>	<p>Ensure Notice of Compliance and process for alternative forms of communication.</p> <p>Ensure physically accessible as appropriate on trails. See Self-Evaluation Report for specific violations.</p>
<p>Swamp Bird Walk</p>	<p>Ensure Notice of Compliance and process for alternative forms of communication.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
<p>Swamp Bird Talk</p>	<p>Ensure Notice of Compliance and process for alternative forms of communication.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
<p>Frog Watch, Art Classes, Art Shows, Art Show Receptions, Art Show Field Days , Flashlight Nights, Great Backyard BirdCount</p>	<p>Ensure Notice of Compliance and process for alternative forms of communication.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
<p>Volunteer Days</p>	<p>Ensure Notice of Compliance and process for alternative forms of communication.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p> <p>Ensure process for reasonable accommodations for volunteer assignments/activities.</p>
<p>Haunted Hikes for Kids, Swamp Birthday, Big Swamp Birthday Bash</p>	<p>Ensure Notice of Compliance and process for alternative forms of communication.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>

Document Title	Comments
Trail Time for Toddlers, Swamp School, Holiday Camps, Summer Camps, Rockin at the Swamp, Duck Duck Goose Day	<p>Ensure Notice of Compliance and process for alternative forms of communication.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p> <p>Ensure web access to applications where appropriate.</p>
Dog Days	<p>Ensure Notice of Compliance and process for alternative forms of communication.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
Volunteers working on Blue Bonnet Swamp Nature & Conservation Center programs	<p>Ensure process for reasonable accommodations for volunteer assignments/ activities.</p>
Field trips, Special Group Programs, Birthday Outings, Fee Based Offsite Program, Swamp Sleepovers	<p>If BREC sponsored, ensure Notice of Compliance and process for alternative forms of communication.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
Facility Rentals	<p>Ensure process for alternative forms of communication as Renters responsibility.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
Accessible School Bus	<p>Recommend purchase of an accessible school bus or develop a process with an approved vendor, First Student, to provide wheelchair accessible transportation, when needed.</p>



Analysis of Policies & Procedures

Blue Bonnet Swamp Nature & Conservation Center

Document Title	Comments
Kayaks	Ensure kayak programs are physically accessible. See Self-Evaluation Report for specific violations.

Document Title	Comments
Recommend defining responsibility of who should be providing Alternative forms of communications. Many departments stated they would rely on communications but this was not formalized.	
Recommend defining responsibility of ADA compliance for websites that runs through communications or any other departments that may have their own websites. Many departments stated they would rely on ocommunications but this was not formalized.	
Lack of ADA training	Ensure training is provided.
	Recommended training includes: ADA basics, understanding the technical standards, website accessibility & technology and the ADA.

Document Title	Comments
Lack of ADA training	Recommended training includes: hiring procedure, reasonable accommodations, ADA basics, architectural barriers, training volunteers and seasonal staff, service animal, understanding the technical standards, & technology and the ADA
Recreation and Park Commission for The Parish of East Baton Rouge - Facility Rental Contract	Process for alternative forms of communication as Renters responsibility.
Recreation and Park Commission for The Parish of East Baton Rouge - Facility Rental Contract - Public Meetings	Ensure physically accessible. See Self-Evaluation Report for specific violations.
BREC's Independent Park Theater	Include a section for public meetings stating ADA compliance will be ensured; including alternative forms of communication as Renters responsibility.
BREC's Independent Park Theater Summer Camp: Musical Theater, Play Production for Kids Camp	Reasonable efforts to ensure accessibility on stage for people with disabilities.
BREC's Independent Park Theater & Cultural Center Rental Info and Form	Ensure Notice of Compliance and process for alternative forms of communication. Include Behavior Management Policy /Assessment.
BREC Pavilion Rental Information and Application	Ensure physically accessible. See Self-Evaluation Report for specific violations.
BREC Aquatics Programs and Registration Card	Include a section for rental form stating ADA compliance will be ensured; including alternative forms of communication as Renters responsibility.
	Ensure physically accessible. See Self-Evaluation Report for specific violations.
	Include a section for rental form stating ADA compliance will be ensured; including alternative forms of communication as Renters responsibility.
	Ensure physically accessible. See Self-Evaluation Report for specific violations.
	Ensure there are therapeutic aquatics programs at some locations.



Analysis of Policies & Procedures

Recreation Department

including Special Facilities, Outdoor Recreation, and CORE Divisions

Document Title	Comments
Recreation & Park Commission Special Events Application	<p>Include a section for rental form stating ADA compliance will be ensured; including alternative forms of communication as Renters responsibility.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
Cooperative Agreement YMCA and BREC Recreation & Park Commission	<p>Include a section in agreement stating ADA compliance will be ensured; including alternative forms of communication as Renters responsibility.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
Baton Rouge Gallery Facility Rental Contract	<p>Include a section for rental form stating ADA compliance will be ensured; including alternative forms of communication as Renters responsibility.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
Baton Rouge Gallery: Movies & Music on the lawn, ARTICulate Gallery Talks, Opening Receptions, Studio Art Classes, Arty Party Birthday Parties	<p>Ensure Notice of Compliance and process for alternative forms of communication.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
Baton Rouge Gallery: Summer Camps	<p>Ensure Notice of Compliance and process for alternative forms of communication. Include Behavior Management Policy /Assessment.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
Baton Rouge Gallery: Facility Rentals	<p>Include a section for rental form stating ADA compliance will be ensured; including alternative forms of communication as Renters responsibility.</p> <p>Ensure physically accessible. See Self-Evaluation Report for specific violations.</p>
Art Classroom 2006 used for	<p>Ensure Notice of Compliance and process for alternative forms of communication. Designate service animal relief area.</p>

The term *accessible* means ADA compliant and ADA accessible.



Analysis of Policies & Procedures

Recreation Department

including Special Facilities, Outdoor Recreation, and CORE Divisions

Document Title	Comments
emergency shelter for hurricane	Ensure physically accessible. See Self-Evaluation Report for specific violations.
Baton Rouge Gallery, Incorporated monthly board meetings	Ensure Notice of Compliance and process for alternative forms of communication. Ensure physically accessible.
January Woods, February Woods, March Woods, October Woods & December Woods Walks; Nature Hike with Outdoor Adventure	Ensure Notice of Compliance and process for alternative forms of communication.
Birds & Beyond Hike & Paddle, Summer Ends Night Hike,	Ensure physically accessible. See Self-Evaluation Report for specific violations.
Bio Blitz, Back to Nature Photo Contest	Ensure Notice of Compliance and process for alternative forms of communication.
Blueway Trails	Ensure physically accessible. See Self-Evaluation Report for specific violations.
Capital Area Pathway Trails, Concrete Walk Ways, Indoor Walking Tracks, Multi-use Pathways & Walking Loop	Ensure physically accessible. See Self-Evaluation Report for specific violations.
Nature Trail	Ensure physically accessible. See Self-Evaluation Report for specific violations.
Primitive Trail	Consider making an educational video to provide to patrons unable to traverse these trails.



Analysis of Policies & Procedures

Recreation Department

including Special Facilities, Outdoor Recreation, and CORE Divisions

Document Title	Comments
Revive your Mind Hikes	Ensure Notice of Compliance and process for alternative forms of communication.
Fishing Rodeo	Ensure physically accessible. See Self-Evaluation Report for specific violations.
Extreme Green 5K & Fair; Run, Ride Row Triathlon & Fair	Ensure physically accessible. See Self-Evaluation Report for specific violations.
Public Outreach events; Earth Day, Ocean Commotion, park opening, conferences, school events, Festivals	Ensure Notice of Compliance and process for alternative forms of communication; Access to 5 K & Triathlon and related Fairs.
Green Force Volunteer Training	Ensure Notice of Compliance and process for alternative forms of communication.
Volunteer Projects	Ensure physically accessible. See Self-Evaluation Report for specific violations.
Service Learning Field Program	Ensure process for providing alternative forms of communication.
Presentations - present generally off site on conservation program topic	Ensure physically accessible. See Self-Evaluation Report for specific violations.
BREC Programming Assessment	Ensure process for reasonable accommodations for volunteer assignments/ activities.
Camper Assessment	Ensure Notice of Compliance and process for alternative forms of communication. Ensure physically accessible. Include Behavior Management Policy /Assessment.
Missing Documents	Ensure Notice of Compliance and process for alternative forms of communication. Ensure physically accessible at presentation locations.
	Consider rewording the phrase "Diagnosed Disability" and target possible accommodations for participation instead of general disabilities such as hearing, visual or
	Recommend to consider rewording the section on "Medical Diagnosis" and request information directly related to accommodations needed for participating in camps. It may
Missing Documents	Comments



Analysis of Policies & Procedures

Recreation Department

including Special Facilities, Outdoor Recreation, and CORE Divisions

Document Title	Comments
Knock Knock Children's Museum	No policies or procedures received
Highland Observatory	No policies or procedures received
Liberty Lagoon Aquatic Center	No policies or procedures received
Independence Park Theater	No policies or procedures received
Greenwell Springs Equestrian Center	No policies or procedures received
Airline Highway Fairgrounds	No policies or procedures received
Farr Park Equestrian Center	No policies or procedures received
Magnolia Mound Plantation	No policies or procedures received



Analysis of Policies & Procedures

Finance

Document Title	Comments
Lack of ADA training	Recommended training includes: hiring procedure, reasonable accommodations, & ADA basics.
Independent Contractor Agreement (under \$10,000)	Consider adding statement identifying the limits of reasonable accommodations that can be extended to the contract employee.
Independent Contractor Agreement (over \$10,000)	Consider adding statement identifying the limits of reasonable accommodations that can be extended to the contract employee.
BREC Independent Contract Agreement (Over \$10,000)	Add ADA Compliance section in contract as contractors responsibility.
BREC Independent Contract Agreement (Under \$10,000)	Add ADA Compliance section in contract as contractors responsibility.
Agreement for Understructure Use Recreational Area	If renewable, add ADA Compliance requirements.
Memorandum of Understanding BREC & City of Baker	If possible, ensure ADA compliance requirements met on agreed upon improvements.



Analysis of Policies & Procedures

Human Resources

including Risk Management Division

Document Title	Comments
Lack of ADA training	Recommended training includes: hiring procedure, reasonable accommodations, ADA basics, architectural barriers, training volunteers and seasonal staff, service animal, understanding the technical standards, & technology and the ADA.
Lack of a Return to Work Policy	Recommend creation of a policy.
New Hire Orientation Process	Include training for new hires specifically focusing on the proposed new ADA policies and procedures.
Training Course Offerings	Consider including ADA training on an on-going basis. Ensure all contractors that provide training are aware of their responsibilities to provide accessible trainings under ADA. Recommend this to be included in contracts.
HR Admin Rules & Regulations: Chapter 7: Recruitment, Examinations & Appointments	Add ADA Compliance section as it pertains to Reasonable Accommodations for the application and interview stages of recruitment.
HR Admin Rules & Regulations: Chapter 10 Disciplinary Actions, Separations & Appeals	Develop a separate ADA Grievance Process for ADA complaints from citizens.
HR Admin Rules & Regulations: Chapter 2 By Laws	Ensure Notice of Compliance and process for alternative forms of communication. Ensure physically accessible.
Supervisory Training	Enhance ADA Title I information especially include Reasonable Accommodation Process & Definition of Disability
New Employee Orientation	Add Basic ADA info regarding Title I & Title II



Analysis of Policies & Procedures

Human Resources
including Risk Management Division

Document Title	Comments
HR Admin Rules & Regulations: Light Duty	Consider adding a statement regarding accommodation under Title I ADA for reassignment to another position within this section.
Special Provision for Separation of Sick or injured employees	Prior to separation, ensure efforts are made to ensure that accommodation options have been offered to allow employee to perform the essential functions of their job, given that employee meets the definition of disability and is covered under Title I of the ADA.
Job Applications	Recommend to include a statement on Equal Employment Employer. A sample statement is below:
	"BREC does not discriminate on the basis of disability in the admission or access to, treatment or employment in, its programs or activities." Reasonable accommodations will be provided upon request in the employment process.
	For contractors sample statement: Contractors are prohibited from discriminating in employment on the basis of race, creed, color, religion, national origin, sexual orientation, gender identity, disability, sex, or age during an employment action, including recruiting, advertising, hiring, layoff, termination, classification, training or selection for training, promotion, demotion, transfer, or compensation. Contractors shall not retaliate against any person who files a complaint or participates in an investigation of a complaint.

Missing Policies	
Lack of procedure or person responsible for providing Alternate Forms of Communication.	
Lack of responsibility to ensure Webtrack is Accessible.	
Lack of responsibility for ensuring all software and hardware purchased and used by any department is accessible.	
Lack of ADA training	Recommended training includes: reasonable accommodations, ADA basics, service animal, & technology and the ADA



Analysis of Policies & Procedures

Planning and Engineering

including CIP and Natural Resource Management Divisions

Document Title	Comments
Lack of ADA training	Recommended training includes: reasonable accommodations, ADA basics, architectural barriers, service animal, understanding the technical standards, & technology and the ADA.
Lack of Inspection to verify compliance with maintenance and/or new construction	Recommend including a responsibility in construction/acceptance checklist protocol for ensuring ADA compliance and/or for accepting contractors work.
Permit Review	Responsibility is currently on the State Fire Marshall. Consider including an internal review requirement.
Acquisition Policy	No criteria for ensuring ADA compliance for acquisitions.
Cooperative Endeavor Agreement- Independence as example	No language regarding ADA compliance obligation.
	Recommend revision and/or alteration to all future agreements.
	Recommend designation of responsibilities in Parking for both the Park & Library.
Copy of Planset-Hooper Example	Recommend the following items to clarify on drawings for future projects:
	Running slope not to exceed 1:20 (5%). Consider reducing this to allow for a margin of error.
	Minimum widths of accessible routes to be 36". Consider exceeding this to allow for a margin of error.
	Trees that overlap the circulation path shall not be lower than 80".



Analysis of Policies & Procedures

Planning and Engineering

including CIP and Natural Resource Management Divisions

Document Title	Comments
Standard Details	Recommend the following items to clarify on standard details for future projects:
	Waste Receptacles: 30" x 48" area with slopes not to exceed 2% in any direction shall be provided adjacent to receptacle. Consider reducing this to allow for a margin of error.
	Parking space and access aisle slopes not to exceed 1:50 (2%) in any direction. Consider reducing this to allow for a margin of error.
	Cross slope to not exceed 1:50 (2%). Consider reducing this to allow for a margin of error.
	Add curb ramp details.
	Add Detectable warning details
CIP Work Orders	Add detail for driveways approach showing sidewalk through with compliant cross slope.
	If you use consistent fixtures, consider including the specs and/or details. Such as drinking fountains, picnic tables, trash receptacles, recycling, bike racks, kiosks, etc.
	No work orders were reviewed. Ensure work orders consider ADA compliance as a factor.



Analysis of Policies & Procedures

Park Operations
including Maintenance Division

Missing Documents

Lack of standard details.

Lack of responsibility to review work orders and final maintenance alterations for ADA compliance.

Lack of process for winterizing aquatic facilities to ensure pool lifts are maintained.

Document Title	Comments
Denial Policy for Applicants	Only exists for summer camps. Recommendation to produce a policy for all programs.
Online Registration	<p>Summer Camp Registrations are available online only. Revise website to be fully accessible.</p> <p>Reccomendation to provide alternate means of registration.</p>
Frenchtown	<p>Informal policy that does not allow wheels including bicycles or wheelchairs on trails.</p> <p>Recommend developing a stance on if modifying this policy would be a reasonable modification or an undue burden or fundamental alteration.</p>
Conservation Sites	No policy identifying that conservation is #1 priority and recreation is secondary. This is recommended in order to determine if potential accomodation or modication would provide a fundamental alteration to the program.
Natural Explorers Application	Stated a policy not to administer medication. It is recommended to research recent court rulings which have ruled that administering medication may be a reasonable modification that is practical. Recommend developing on this policy.



Analysis of Policies & Procedures

Park Rangers

Document Title	Comments
No documents received	Need to Review any Programs/Policies