

## **POLICY AND PROCEDURES ON PROHIBITION OF DISCRIMINATION ON THE BASIS OF DISABILITY**

Briarwood Day Camp (“Briarwood”) remains committed to making its programs and activities available on a nondiscriminatory basis as required under Title III of the Americans with Disabilities Act (ADA). Briarwood will not discriminate against any individual on the basis of disability, including a child with diabetes, with regard to the full and equal enjoyment of its goods, services, facilities, privileges, advantages and accommodations, including but not limited to participation in the Summer Day Camp (collectively, “Briarwood’s Programs”). Briarwood will make reasonable modifications for children with disabilities, both applicants and those already enrolled, on a case by case basis, to permit them to participate in Briarwood’s Programs, unless Briarwood can demonstrate that making the modifications would fundamentally alter the nature of its goods, services, facilities, privileges, advantages and accommodations or that the individual poses a direct threat to the health or safety of others. Briarwood recognizes that children with insulin-dependent diabetes who participate in Briarwood’s Programs may require assistance with diabetes management. The management regime of every child with diabetes may be different and therefore one policy cannot dictate the particular protocol for all individuals.

Briarwood affirms that successful participation of the child and accommodation of the child’s needs depend on an actively cooperative relationship and ongoing communication between the parent/guardian and Briarwood.

### **Individualized Assessment and Reasonable Modification**

Briarwood will provide this Policy; the procedure to request reasonable modification; a Diabetes Management Plan Form (Attachment A); and a Physical Examination Form (Attachment B), on Briarwood’s website (<https://www.briarwooddaycamp.com>). When informed that a child with diabetes has applied to a Briarwood Program, Briarwood will provide the parent/guardian of such child notice of this Policy. Briarwood will provide a written copy of the Policy, including the attachments, upon request.

Absent extenuating circumstances, within 8 weeks prior to the first day of Briarwood’s Summer Camp season, Briarwood will individually assess the needs of each child with diabetes on a case-by-case basis and work with families to provide reasonable modifications in accordance with this Policy and applicable laws. Briarwood will assess the level of assistance or supervision that is reasonable and provide assistance that is appropriate and consistent with the Diabetes Management Plan (Attachment A). Briarwood may request additional information or guidance from the child’s healthcare provider or parent/guardians as necessary.

If an agreement cannot be reached for Briarwood to provide reasonable modifications, Briarwood will notify the parent/guardian of its final determination. The determination will document which modifications Briarwood will provide and which modifications it will not provide, demonstrating that the modification not provided would fundamentally alter the nature of its service, program, or activity.

Notwithstanding providing reasonable accommodations, in all cases Briarwood will allow the parent/guardian or authorized person to enter Briarwood’s premises to monitor the child’s blood glucose levels and take appropriate action in response to those levels. Briarwood staff will also

allow the child to monitor his or her own blood glucose levels and take appropriate action if all parties agree that it is appropriate for the child to do so.

If the child self-identifies, or staff recognizes symptoms of hyperglycemia or hypoglycemia, Briarwood staff will take steps consistent with the Diabetes Management Plan.

### **Training**

If a child with diabetes applies for and is enrolled at Briarwood, Briarwood will arrange for a qualified healthcare professional to provide training to all Briarwood staff who may be responsible for or may be working directly with a camper with diabetes on a daily basis. The training will include an overview of diabetes, general information on how to recognize signs and symptoms of hypoglycemia and hyperglycemia, training on blood sugar testing (including the use of a Dexcom continuous glucose monitor or other similar continuous monitoring system as an enrolled child may have); how to get help quickly, and diabetic care practices.

In addition, Briarwood will arrange for training of appropriate staff regarding the particular needs of the child as identified in the child's Diabetes Management Plan.

### **Parent's/Guardian's Responsibilities**

Between May 1 and June 1 of a given camp year, the parent/guardian of a child with diabetes will provide Briarwood with the following:

- (1) a completed Diabetes Management Form, legible and in easy to understand terms, detailing any and all care necessary for the child's management, which is signed by the child's health care provider and signed by the child's parent/guardian to permit Briarwood to undertake steps indicated on the Diabetes Management Form (Attachment A),
- (2) a completed Physical Exam Form and any other health-related documents deemed relevant by the child's medical provider (Attachment B), and
- (3) a signed general release, if applicable.

For children currently attending a Briarwood Summer Camp program who would require diabetes management for the first time during any session, the parent/guardian must immediately submit the completed Diabetes Management Plan as set forth above, and comply with the remaining aspects of this Policy with sufficient time to allow Briarwood to make good faith efforts for continuation of the camp program consistent with this Policy.

The parent/guardian will be available at Briarwood's request to attend and participate on the first day of a camp session with the child and, if deemed necessary by either party, to attend a run-through prior to the first day, and to continue to meet with and advise the staff working with the child about proper diabetes care. The parent/guardian or other emergency contacts, which includes the child's health care provider, will be available by phone each day that the child participates in a camp session.

The parent/guardian will provide specific information and training about the child's diabetes

and particular needs related to diabetes care to Briarwood and will permit the child's personal health care provider(s) to share information with staff and other health care personnel to assure the child's safety and compliance with the child's Diabetes Management Plan.

In addition, the parent/guardian will:

- 1) promptly inform Briarwood of relevant changes in the child's health status;
- 2) provide all supplies and equipment necessary, including instructions about proper maintenance or use of all items, for the child's safe participation in all activities. The supplies and/or equipment will be held at the administrative office or health office, or by a staff member;
- 3) furnish meals and snacks not regularly provided by Briarwood that are necessary to meet the child's needs. The parent/guardian will also ensure that the carbohydrate content falls within the proper amounts set forth in the Diabetes Management Plan. Carbohydrate values will be calculated and provided on labels on each food item provided by the parent/guardian so that the staff or qualified health care professional may monitor the appropriate use of insulin and insulin pumps or other equipment to administer insulin;
- 4) check the child's blood sugar levels each morning before the child arrives at camp to ensure they are within the established "target range" in the child's Diabetes Management Plan.

If you have any questions about this Policy, please contact the ADA Compliance Officer and Co-Owner, Mike Green at (215) 598-7143.