Hillsborough County Board of County Commissioners
Parks and Recreation Department ADA Transition Plan

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This Transition Plan was prepared by McCloud Transportation + Associates of Odessa, Florida in association with Jerel McCants Architecture, Inc. of Tampa, Florida and DBC Design, LLC of Valrico, Florida.

Disclaimer: This entire document serves only as information and is not intended to reflect the legal opinion or position of McCloud Transportation. For legal issues, the County’s legal advisor should be consulted.

Cover Page Photo Credits: Andrew Chasanoff-Wheelchair Basketball at All People’s Life Center and Wheelchair Waterskiing, and Bezaleel Yisrael-Playground at Skyway Sports Complex.
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HILLSBOROUGH COUNTY
PARKS AND RECREATION DEPARTMENT

Mission Statement

“Enhancing lives through people, parks, and enjoyable experiences.”

Vision Statement

“To be the best parks and recreation department in the country.”

Guiding Principles

• An Atmosphere of Excellence
• Resident Satisfaction
• An Assortment of Services for a Diverse Population
• Health & Wellness
• Develop Partnerships to Maximize Facility and Program Opportunities
• Integrity
  ➢ “Be Honest; Be Fair; Tell the Truth; Keep Your Word; Exercise Integrity.”
• Safe, Secure, and Welcoming Parks for Everyone
• Innovation
• Education
1. Introduction and Background

The Hillsborough County Parks and Recreation Department has a rich history of accessibility and compliance with the Americans with Disabilities Act (ADA). All People’s Life Center, which opened in 2007, is one of Hillsborough County’s showcase facilities for inclusion. On February 22, 2018, the Hillsborough County Board of County Commissioners released an Invitation to Bid (No. 16961) to conduct the ADA Parks Consulting Services project. The purpose of the solicitation was to obtain a qualified contractor to evaluate and consult on compliance with the ADA at 144 parks located through the County as the Parks and Recreation Department transitions all park properties to meet the U.S. Department of Justice’s (DOJ) 2010 ADA Standards for Accessible Design. In May of 2018, McCloud Transportation & Associates, LLC located in Hillsborough County, was selected to conduct the project, which was performed by a team of ADA, architect and design professionals.

1.1 ADA Requirements

The ADA is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. Hillsborough County has undertaken a comprehensive re-evaluation of its Parks and Recreation Department policies, programs, and facilities to determine the extent to which individuals with disabilities may be limited in their access to Parks and Recreation programs, services and activities.

Title II of the ADA (28 CFR Part 35.150) requires local governments such as Hillsborough County having responsibility for or authority over facilities and services to develop a Transition Plan to ensure their facilities meet the standards for accessibility. Program accessibility means that a program; when viewed in its entirety is readily accessible to and usable by individuals with disabilities. The ADA also states that a public entity must reasonably modify its policies, practices, or procedures to avoid discrimination against people with disabilities. Title II requires a public entity to make its programs accessible in all cases except where to do so would result in a fundamental alteration in the nature of the program, or in undue financial and administrative burdens.

Per the Title II requirements of the ADA, a Transition Plan shall achieve the following:

1) Identify physical obstacles in the public entity’s facilities that limit the accessibility of its programs or activities to individuals with disabilities;
2) Describe in detail the methods that will be used to make the facilities accessible;
3) Specify the schedule for taking the steps necessary to achieve compliance. If the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period; and
4) Indicate the official responsible for implementation of the plan.
1.2 Project Scope of Work

The Hillsborough County project Scope of Work was comprised of the following three key tasks:

- **Task One**: Develop a Self-Evaluation Survey consistent with the 2010 ADA Standards for Design for use in conducting a survey of 144 designated park sites located throughout Hillsborough County. Review Parks and Recreation Department policies and procedures, program processes to identify those that may limit access and participation by persons with disabilities to programs and services. Conduct surveys of all public use interior and exterior features of all park sites. Identify physical barriers to accessibility of all park programs and services.

- **Task Two**: Develop an ADA Self-Evaluation Report that includes the results of the Self-Evaluation Survey. Provide a prioritized listing of all structural and non-structural barriers preventing access to programs, services and amenities. Include deficiencies in policies and procedures needing to be modified and those areas identified which do not currently have policies and procedures in place.

- **Task Three**: Develop an ADA Transition Plan to serve as the County’s roadmap to compliance with the ADA’s rules and regulations for any deficiencies noted within the ADA Self-Evaluation Report. Include visual representations of the location and all structural and non-structural barriers, and provide a conceptual solution to resolving each barrier, and planning level cost estimates for the removal of each barrier. Rank each barrier according to priority from the highest to the lowest and develop model policies and procedures recommended for use by the County based on the review of policies and procedures findings from the ADA Self Evaluation Report.

1.3 ADA Self-Evaluation Report (Tasks 1 and 2)

Title II of the ADA also requires local governments to conduct a Self-Evaluation Survey to evaluate its current services, policies and practices, and the effects thereof, that do not or may not meet the requirements of the ADA, and to the extent modification of any such services, policies and practices is required, the public entity shall proceed to make the necessary modifications.

Hillsborough County has already complied with the self-evaluation requirements of the regulations when it conducted a County-wide ADA Self Evaluation; however Parks and Recreation Department policies, procedures and practices were not fully addressed in the previous evaluation, which was conducted in January 2005.

McCloud Transportation & Associates conducted an ADA Self-Evaluation Survey of 144 designated park sites selected by the County and located throughout Hillsborough County. The survey was conducted using the ADA Checklist for Existing Facilities, and the DOJ’s ADA Title II regulations 28 CFR Part 35.150, which sets forth the requirements for state and local governments. The Self-Evaluation Survey was conducted consistent with the 2010 ADA Standards for Accessible Design as required in the Scope of Work.
The ADA Self-Evaluation Report included the formal results of the Self-Evaluation Survey. Parks and Recreation Department policies and procedures were reviewed to identify those that may limit access and participation by persons with disabilities to programs and services. Physical barriers to accessibility of the park programs were identified. A prioritized listing of all structural and non-structural barriers preventing access to programs and services was provided, and deficiencies in policies and procedures were identified. The ADA Self-Evaluation Report was submitted to the Parks and Recreation Department on September 20, 2018.

1.4 Hillsborough County 2001 ADA Transition Plan

On October 17, 2001, Hillsborough County Board of County Commissioners adopted the County-wide ADA Transition Plan as required by the ADA law. The Parks and Recreation Department was one of six Hillsborough County facility categories included in the Transition Plan:

1. Parks and Recreation
2. Government Facilities
3. Libraries
4. Fire and Rescue
5. Water Department
6. ADA Curb-Ramp/Sidewalk Program

The 2001 Transition Plan focused on four areas of improving accessibility for Parks and Recreation:

1. Parking and sidewalks
2. Drinking fountains
3. Building modifications
4. Regional parks

Although the 2001 Transition Plan included the Parks and Recreation Department, the review of the Department’s policies, procedures and program processes to identify those that may limit access and participation by persons with disabilities to programs and services was somewhat limited. The 2001 ADA Transition Plan included an Action Plan for 178 recommended County-wide projects (including Parks and Recreation) by priority, estimated costs and completion dates. Construction scopes were prepared consistent with the ADA Architectural Guidelines (ADAAG) and other Florida Accessibility Codes for Building Construction. Total cost for the recommended 178 County-wide projects was $4.83 million.

The 2001 Transition Plan identified 216 Priority One Parks and Recreation Department projects, 239 Priority Two projects, 439 Priority Three Projects and 382 Priority Projects for a grand total of 1,276 projects. The 2001 Transition plan pre-dated the passage of the 2010 Standards for Accessible Design that became effective on March 15, 2012.
1.5 Parks and Recreation Department 2018 ADA Transition Plan (Task 3)

The DOJ published revised regulations for Title II of the ADA on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design. On March 15, 2012, compliance with the 2010 Standards was required for new construction and alterations under Titles II (and III). March 15, 2012, is also the compliance date for using the 2010 Standards for program accessibility and barrier removal.

Currently, Hillsborough County Parks and Recreation Department is transitioning all park properties to meet the 2010 ADA Standards for Accessible Design. The goal of the 2018 Transition Plan for the Parks and Recreation Department is to serve as a roadmap to compliance with the ADA’s rules and regulations for any deficiencies noted within the September 2018 ADA Self-Evaluation Report, which included the results of the Self-Evaluation Survey of 144 park facilities throughout Hillsborough County, and identified barriers to accessibility of all park programs and services. A total of 1,852 non-compliant items were identified.

1.6 ADA Design Standards

The DOJ published revised regulations for Titles II (and III) of the Americans with Disabilities Act of 1990 “ADA” in the Federal Register on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design “2010 Standards” or “Standards”. The 2010 Standards set minimum requirements – both scoping and technical for newly designed and constructed or altered State and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities.

Adoption of the 2010 Standards also establishes a revised reference point for Title II entities that choose to make structural changes to existing facilities to meet their program accessibility requirements. State and local government facilities must follow the requirements of the 2010 Standards, including both the Title II regulations at 28 CFR 35.151; and the 2004 ADAAG at 36 CFR part 1191, appendices B and D. In the few places where requirements between the two differ, the requirements of 28 CFR 35.151 prevail.

The Department has assembled this online version of the official 2010 Standards to increase its ease of use. This version includes:¹

2010 Standards for State and Local Government Facilities Title II

State and Local Government Facilities: Guidance on the Revisions to 28 CFR 35.151

There are three types of circulation that can provide accessibility and each must begin at a point of arrival; i.e. a parking space: The basic building blocks for accessible parks include:

1. **Exterior route of travel** – A continuous, unobstructed path connecting accessible elements and spaces in a building or between exterior elements of a facility. Exterior and accessible routes are safe and useable by persons with disabilities, including pedestrians and visitors requiring the use of mobility devices. These paths or routes may include walks, sidewalks, ramps, corridors and other such improved areas.

2. **Outdoor recreation access route** – Paths that connect and provide access to elements within a picnic area, camping area or designated trailhead.

3. **Trails** – Paths that provide access to a site’s remote settings or that are constructed primarily for outdoor recreational purposes. Trails enhance the visitor’s experience of natural and cultural features of a site, allowing varied levels of accessibility without negatively impacting the recreational activity or resources.

In the event that a park program or facility is not, or cannot be made physically accessible, parks staff must make reasonable modifications in policies, practices and/or procedures when necessary to ensure that people with disabilities are afforded an equal opportunity to benefit from the program or activities provided.
2. Methodology for ADA Transition Plan and Components

The process utilized to develop the ADA Transition Plan mirrored the regulatory requirements of Title II of the ADA. The plan represents over six months of comprehensive and collaborative work with the County. The development of the Transition Plan was preceded by two key tasks:

1. Self-Evaluation Survey – The survey was conducted consistent with the 2010 ADA Standards for Accessible Design. A survey was conducted of 144 designated park sites located throughout Hillsborough County. Parks and Recreation Department policies and procedures were reviewed, and program processes to identify those that may limit access and participation by persons with disabilities to programs and services. The survey was conducted of all public use interior and exterior features of all park sites and physical barriers to accessibility were identified of all park programs and services. Using the ADA Checklist for Existing Facilities, a total of 1,852 items of non-compliance were identified.

2. ADA Self-Evaluation Report – The report included the results of the Self-Evaluation Survey. A prioritized listing was provided of all structural and non-structural barriers preventing access to programs, services and amenities. Deficiencies in policies and procedures were included in the report, policies needing modification and those areas within Parks and Recreation which did not have policies and procedures in place. The prioritization of components within facilities and parks was based on the recommendations of Title II of the ADA. Priorities were ranked from one to four with one being the highest priority and four being the lowest level of priority. The ADA Self-Evaluation Report was submitted to the Parks and Recreation Department on September 20, 2018.

The approach and methodology to developing the Transition Plan included, but were not limited to the following key elements:

- Literature Review – Relevant documents reviewed included Parks and Recreation’s existing policies, procedures and program guidelines, handbooks, training programs, and program contracts and agreements.
- Staff Interviews – Over 35 staff interviews were conducted during Task Two and Task Three to obtain feedback on existing practices and to identify policies that are lacking, deficient and requiring modification.
- Review of Parks and Recreation Department Webpage – A comprehensive review was conducted of the Department’s public website to examine policies, procedures and program processes currently used.
- Bi-Weekly Meetings with County Staff – Every two weeks, meetings were conducted at All People’s Life Center with the project management team to provide project updates, discuss milestones, and to exchange information.
Planning level cost estimates were developed and are based on industry estimating websites and proprietary software used by developers, architects, engineers and contractors. Model policy recommendations were developed based on the following:

- Parks and recreation industry best practices
- Peer interviews, peer reviews, lessons learned and DOJ case studies
- Staff interviews to identify policies that needed revision or those that were lacking
- Hillsborough County Parks and Recreation Department’s existing website
- 2010 Department of Justice (DOJ) ADA Standards for Accessible Design (ADASAD)
- 2013 U.S. Access Board (ABA) Accessibility Guidelines for Outdoor Developed Areas, 36 Part 1191 (AODA)

2.1 Key Components of the ADA Transition Plan

The 2018 ADA Transition Plan is a companion document to the Parks and Recreation Department’s ADA Self-Evaluation Report and includes the following key components:

- Visual representations of the location of all structural and non-structural barriers
- Conceptual solutions to resolving each barrier
- Planning level cost estimates for the removal of each barrier
- Ranking of each barrier according to priority from the highest to the lowest
- Model policies and procedures recommended for use by the County based on the review of policies and procedures findings from the ADA Self-Evaluation Report

The Transition Plan represents the final task (Task Three) which is to develop an ADA Transition Plan to serve as the County’s roadmap to compliance with the ADA’s rules and regulations for any deficiencies noted within the ADA Self-Evaluation Report.
3. Priority Rankings, Barriers, Solutions and Cost Estimates

Visual representations are included in this report of the structural and non-structural barriers at the 144 park locations surveyed. For each park facility, exterior and interior (where applicable) features were surveyed to identify barriers to accessibility. Photos were taken, and field as-built drawings and computer-aided drawings of bathrooms were developed to conceptualize and provide visual representations of the barriers. Please see Appendix A: Barriers, Solutions, Priority Rankings, Cost Estimates, Photos and As-Built Drawings.

Feasible conceptual solutions and planning-level cost estimates were developed for resolving each barrier, which was ranked according to priority from the highest to the lowest. Findings were re-examined from the previous review of Parks and Recreation Department policies included in the Self-Evaluation Report. Model policies and procedures based on these findings were developed for use by the County.

3.1 Prioritization and Ranking of Barriers

The prioritization of components within existing park facilities was developed based on the requirements of Title II (State & Local Government Facilities) and Title II (Places of Public Accommodation). Structural and non-structural barriers were prioritized that prevent access to amenities, programs and services at park facilities, and ranked from the highest to the lowest number of barriers using a scale of one to four.

One was the highest priority featuring barriers that provided accessibility at the main entrance of a facility or improved a path of travel to the portion of the facility where program activities take place. A second priority featured barriers that enhanced access to a program. A third level priority was placed on barriers that improved access to amenities serving program areas such has restroom facilities. Fourth level priority ranking was assigned to areas or features that are not required to be modified for accessibility, or where other measures can be taken to provide access to the goods, services or facilities. Prioritization is required to understand the ADA requirements.

Dover Park had the highest number of non-compliant items at 52. Westgate Park and Roy Henley Park were in full compliance. Three parks were undeveloped properties; Valencia Lakes Park, Shadow Run Park and Panther Trace Park.

The ADA urges that measures are taken to comply with the barrier removal requirements in accordance with the following order of four priorities, which are listed in the DOJ’s ADA Title III regulations (28 CFR 36.304); however these priorities are “equally applicable” to Title II state and local government facilities.
- **Priority 1:** Accessible approach and entrance – The highest priority is placed on those barrier removal items that provide accessibility at the main entrance of a facility or improve a path of travel to the portion of the facility where program activities take place (for example, parking, walks, ramps, stairs, doors, corridors). The County takes measures to provide access to parks and recreation facilities from public sidewalks, parking, or public transportation. These measures include, for example, installing an entrance ramp, widening entrances, and providing accessible parking spaces.

- **Priority 2:** Access to goods and services – A second level priority is placed on those barrier removal items that improve or enhance access to program use areas (for example, meeting rooms, public offices, and restrooms. The County takes measures to provide access to those areas where goods and services are made available to the public. These measures include, for example, rearranging tables, widening doors, and installing ramps.

- **Priority 3:** Access to public toilet rooms – A third level priority is placed on those barrier removal items that improve access to amenities serving program areas (for example, drinking fountains, telephones, site furnishings, and vending machines) The County takes measures to provide access to restroom facilities. These measures include, for example, removal of obstructing furniture or vending machines, widening of doors, installation of ramps, providing accessible signage, widening of toilet stalls, and installation of grab bars.

- **Priority 4:** Access to other items such as water fountains – A fourth level priority is given to areas or features not required to be modified for accessibility (for example, no public programs located in this area or duplicate features where accessibility is already provided). The County takes any other measures necessary to provide access to the goods, services, facilities, privileges, advantages, or accommodations.

In facilities, top priority focus on providing access into the facility. These elements include exterior routes of travel and accessible routes of travel. This includes a continuous unobstructed path connecting accessible elements and spaces in a building or between exterior elements of a facility. Exterior and accessible routes should be safe and useable by persons with disabilities, including pedestrians requiring the use of mobility devices. These paths or routes may include walks, sidewalks, ramps, corridors and other such improved areas.

In parks, top priority focus on providing access into the park. These elements include exterior routes of travel and accessible routes of travel. Outdoor recreation access routes include paths that connect and provide access to elements within a picnic area, camping area or designated trailhead.
### Figure 1: Barrier Removal Priorities (Facilities)

<table>
<thead>
<tr>
<th>Facilities Priorities</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td><strong>Inaccessible approach and exterior, parking, routes from public rights of way/sidewalk, public transportation, building entrance, and exterior doors.</strong> The County should take measures to provide access to a place of public accommodation such as parks and recreation facilities from public sidewalks, parking, or public transportation. These measures include, for example, installing an entrance ramp, widening entrances, and providing accessible parking spaces.</td>
</tr>
<tr>
<td>2</td>
<td><strong>Inaccessible interior routes and interior doors.</strong> The County should take measures to provide access to those areas where goods and services are made available to the public. These measures include, for example, adjusting the layout of display racks, rearranging tables, providing Braille and raised character signage, widening doors, providing visual alarms, and installing ramps.</td>
</tr>
<tr>
<td>3</td>
<td><strong>Inaccessible public toilet rooms.</strong> The County should take measures to provide access to restroom facilities. These measures include, for example, removal of obstructing furniture or vending machines, widening of doors, installation of ramps, providing accessible signage, widening of toilet stalls, and installation of grab bars.</td>
</tr>
<tr>
<td>4</td>
<td><strong>Inaccessible drinking fountains and lack of access to other measures.</strong> The County should take any other measures necessary to provide access to the goods, services, facilities, privileges, advantages, or accommodations.</td>
</tr>
</tbody>
</table>

### Figure 2: Barrier Removal Priorities (Parks)

<table>
<thead>
<tr>
<th>Parks Priorities</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td><strong>Inaccessible approach and exterior, parking, routes from public rights of way/sidewalk, public transportation, building entrance, and exterior doors.</strong> The County should take measures to provide access to a place of public accommodation such as parks and recreation facilities from public sidewalks, parking, or public transportation. These measures include, for example, installing an entrance ramp, sidewalks, widening entrances, and providing accessible parking spaces.</td>
</tr>
<tr>
<td>2</td>
<td><strong>Inaccessible playscapes or sports courts.</strong> The County should take measures to provide access to those areas where goods and services are made available to the public. These measures include, for example, installing ramps, curb cuts, and sidewalks.</td>
</tr>
<tr>
<td>3</td>
<td><strong>Inaccessible public toilet rooms.</strong> The County should take measures to provide access to restroom facilities. These measures include, for example, removal of obstructing furniture or vending machines, widening of doors, installation of ramps, providing accessible signage, widening of toilet stalls, and installation of grab bars.</td>
</tr>
<tr>
<td>4</td>
<td><strong>Inaccessible drinking fountains and lack of access to other goods and services.</strong> The County should take any other measures necessary to provide access to the goods, services, facilities, privileges, advantages, or accommodations.</td>
</tr>
</tbody>
</table>

Since not all barriers must be removed in order to provide program access, those barriers that limit access to public programs, services, and activities are given first priority. These criteria should also be used for prioritizing the removal of barriers in future projects.
3.2 Conceptual Solutions to Resolving Each Barrier

For each park facility, barriers are identified and feasible conceptual solutions to each barrier are provided based on the 2010 ADA Design Standards for Accessible Design. Please see Appendix A: Barriers, Solutions, Priority Rankings, Cost Estimates, Photos and As-Built Drawings.

Note: This report is accompanied by a USB Drive with 144 completed ADA Checklists for Existing Facilities based on 2010 ADA Standards for Accessible Design.

3.3 Planning-Level Cost Estimates for Removal of Barriers and Methodology

The methodology used to determine planning-level cost estimates for the removal of each barrier was developed utilizing a number of estimating websites and proprietary software used by developers, architects, engineers and contractors. The websites were www.Homewyse.com; www.Fixr.com and www.Remodelingexpense.com.

The proprietary software used was R.S. Means Construction Cost Estimating Data. This estimating software provides up-to-date cost information to assist in developing competitive estimates for projects. Computations were developed for cost data on construction materials, equipment and labor. The software database includes a construction cost database of over 85,000 unit prices, 25,000 building assemblies and 42,000 facilities repair and remodeling costs covering each and every category of construction.

A spreadsheet was created to itemize each deficiency identified during the Self-Evaluation Survey of the 144 park facilities while completing the ADA Checklist for Existing Facilities. This spreadsheet was further subdivided into categories that could be cross-referenced back to the sections within the checklist. Separate columns were created for barriers/deficiencies, solutions, cost and unit price columns to outline the process towards arriving at the planning-level cost estimate per subsection. Each solution was determined by architects to assist the surveyors by referencing the websites and software listed above.

Upon completion of this analysis, the surveyors extracted the cost to repair/replace or install items to bring existing park and/or facilities into compliance using the priority sheets, that contain a final sheet that outlines the total cost implications per park and facility. Key elements of the planning-level cost estimates include the following:

1. **Cost Estimate Subtotal** – The sum of the itemized repair/replace or install per violation.

2. **Design Cost** - Professional design cost for preparation of permit documents for “considerably less than average complexity” per the Florida Department of Management Services (DMS) Fee Guidelines.²

² DMS – The Florida Department of Management Services is a resource for businesses operating within the State of Florida. Part of its mission is to provide a fair cost rationale for Design Professionals through the competitive
3. **Contractor Overhead and Profit (O&P)** – Typically contractors’ charge O&P to cover time and expenses incurred during a project in the range of 15% - 20%.

4. **Contingency Cost** – Cost used for unforeseen conditions incurred on a project for issues beyond the project Scope of Work that must be resolved in order to complete the project. Typically, this fund is estimated for projects at a rate of 15%. If this fund is not used, then it remains in the owners’ possession.

5. **Total Estimated Cost** – Grand total of all associated estimated costs.

**Note:** Cost Estimates are based on current dollars at time of initial production of this report and are valid up to 90 days beyond issuance of this report.

Below are links to the resources utilized to develop cost estimates:

- [https://www.homewyse.com/](https://www.homewyse.com/)
- [https://www.fixr.com/costs](https://www.fixr.com/costs)
- [https://www.remodelingexpense.com](https://www.remodelingexpense.com)
- [https://www.rsmeansonline.com](https://www.rsmeansonline.com)
- [https://www.rsmeansonline.com/](https://www.rsmeansonline.com/)

Of the 144 parks surveyed, a total of 1,852 items of non-compliance were identified. The cost estimate to remove these barriers is $3,352,445.28. Please see **Figure 3: Non-compliant Items by Park and Cost Estimates.**

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*negotiation of A/E fees. The fee used for this project was computed under the DMS “Fee Calculator” Formula under “F” Curve - “considerably less than average complexity.”*
## Figure 3: Non-Compliant Items by Park and Cost Estimates

<table>
<thead>
<tr>
<th>Park Name</th>
<th>Park Address</th>
<th>Non-Compliant Items</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alexander Park</td>
<td>5602 N. Lois Ave.</td>
<td>11</td>
<td>$56,415.40</td>
</tr>
<tr>
<td>All People's Life Center</td>
<td>6105 E. Sligh Ave.</td>
<td>25</td>
<td>$46,159.16</td>
</tr>
<tr>
<td>All Persons Rotary Park</td>
<td>800 S. Parsons Ave.</td>
<td>13</td>
<td>$20,144.88</td>
</tr>
<tr>
<td>Antioch Sports Complex</td>
<td>8510 Franklin Rd.</td>
<td>25</td>
<td>$44,697.24</td>
</tr>
<tr>
<td>Apollo Beach Park &amp; Comm. Ctr</td>
<td>664 Golf and Sea Blvd.</td>
<td>23</td>
<td>$50,788.08</td>
</tr>
<tr>
<td>Audrey Lane Park</td>
<td>8811 Audrey Lane</td>
<td>2</td>
<td>$945.00</td>
</tr>
<tr>
<td>Balm Park &amp; Comm. Ctr.</td>
<td>14747 Balm Wimauma Rd.</td>
<td>23</td>
<td>$32,656.06</td>
</tr>
<tr>
<td>Beacon Meadows Park</td>
<td>4824 Ridge Pointe Dr.</td>
<td>16</td>
<td>$39,446.22</td>
</tr>
<tr>
<td>Beallsville Comm. Ctr. &amp; Sport Complex</td>
<td>5009 Nesmith Rd.</td>
<td>29</td>
<td>$90,737.64</td>
</tr>
<tr>
<td>Bethune Park &amp; Comm. Ctr.</td>
<td>5809 Edina Street</td>
<td>18</td>
<td>$40,158.72</td>
</tr>
<tr>
<td>Bloomingdale East Park</td>
<td>12211 Nature’s Way Blvd.</td>
<td>22</td>
<td>$53,046.00</td>
</tr>
<tr>
<td>Bloomingdale Hills Park</td>
<td>11020 Peppersong Dr.</td>
<td>12</td>
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*Hillsborough County Parks Sorted by Total Number of Deficiencies Updated: 10/21/18*
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<td>7605 Destin Dr.,</td>
<td>5</td>
<td>$ 10,817.18</td>
</tr>
<tr>
<td>Woodlake Park</td>
<td>9207 Woodlake Blvd</td>
<td>4</td>
<td>$ 10,117.80</td>
</tr>
</tbody>
</table>

1852 $ 3,352,445.28

Paralympic Sports Tampa Bay Participants
4. Recommended Policies and Procedures

A review was conducted of the findings from the Parks and Recreation Department’s policies and procedures from the ADA Self-Evaluation Report submitted on September 20, 2018. Model policies and procedures were developed and recommended for use by the County and are included in this Transition Plan.

4.1 Review of Department Policies from ADA-Self-Evaluation Report

A review was conducted of the Parks and Recreation Department’s existing policies, procedures and program processes (Task 2). The purpose of the review was to identify policies that may limit access and participation by persons with disabilities to programs and services. Deficiencies in policies were identified, along with policies needing modification and areas which did not have policies in place at the time of the review. Below is a summary of the key findings. Detailed findings are included in the ADA Self-Evaluation Report:

1. Camp SPARKS (Inclusion Program)
   Camp Sparks offers after school and summer camps for youth with disabilities between the ages 5-22. The program is designed to offer age/ability appropriate recreation activities to people with various disabilities such as autism, cerebral palsy, spinal cord injuries and learning disabilities. The Inclusion Program provides opportunities for children with disabilities to interact alongside their non-disabled peers in a recreational setting.

   Finding: In 2017 Hillsborough County revised some of the eligibility requirements of the Camp SPARKS program; however, there are no written policies that reflect those changes. Few to none of the Camp SPARKS personnel are Certified Therapeutic Recreation Specialists, which could limit successful participation in the program by persons with disabilities. Staff indicated that training is provided; i.e. First Aid, Concussion, etc. however, there is limited program-related training specific to the Camp SPARKS and Inclusion program policies and program processes.

2. Special Olympics
   This therapeutic recreation program offers training and competition in sports for athletes interested in competing in the Special Olympics, which is a program that offers year round training and competition on a variety of Olympic-type sports for people with intellectual disabilities that includes:
   - Volleyball
   - Swimming
   - Basketball
   - Bocce
   - Bowling
   - Cycling
   - Flag football
Finding: This program is governed by Special Olympics Florida, which identifies eligibility for competition and established the Medical Release Form; however, Parks and Recreation Department-level policies for execution of these state policies are limited. Formal, consistent scheduled program-specific training on execution of these program processes is also limited.

3. **Paralympics Sports Tampa Bay (PSTB)**

This signature program at Hillsborough County Parks and Recreation was established by the Paralympic Division of the United States Olympics Committee. PSTB provides a variety of year round sports and recreation that promotes health, independence and personal growth through sports for people with physical disabilities that includes:

- Wheelchair basketball
- Track and field
- Tennis
- Swimming
- Archery

Finding: Although this program is governed by the Paralympic Division of the United States Olympics Committee, Department-level policies for execution of these national policies are limited. There was no department-level training curriculum that documents topics by hour for new or existing employees. Program training is “on-the-job,” very informal and has limited structure. Training is not mandatory and staff can visit the website of Paralympic Division of the United States Olympics Committee on an optional basis to take classes which generates a letter of completion and continuing education units (CEUs).

Over 35 interviews were conducted with County and Parks and Recreation Department personnel to identify existing policies and procedures and to obtain feedback on policies that limited access to persons with disabilities. A review of the Parks and Recreation Department’s webpage was also conducted to identify policies and procedures and program processes.

4. **Summer Camp 2018 Parent Handbook**

This handbook does not include a table of contents, or frequently asked questions and answers.


This handbook does not include a table of contents, or frequently asked questions and answers.


This plan was created on June 30, 2015 and was updated on January 23, 2018. Training requirements by job classification is included; however the training schedule was not included. The training outline is very general and has limited specificity to policies, procedures and program processes for the Camp SPARKS, Inclusion, Special Olympics, and PSTB programs such as eligibility requirements.
4.2 Policies Requiring Modification

The following Parks and Recreation Department policies, procedures and program processes require modification, and may limit access and participation by persons with disabilities to services:

- Camp SPARKS/Inclusion Program
- Special Olympics
- Paralympics Sports Tampa Bay

4.3 Recommended Policies and Procedures

The following recommended policies and procedures were developed working collaboratively with Parks and Recreation staff and are recommended for use by the County’s Parks and Recreation Department for the following key programs that were identified as having policies and procedures, and program processes that are deficient, require modification or are lacking:

- Camp SPARKS/Inclusion Program
- Special Olympics
- Paralympics Sports Tampa Bay (PSTB)

A review was also conducted of the following Parks and Recreation Department’s documents:

- Summer Camp 2018 Parent Handbook

Interviews were conducted with personnel with direct responsibility for policies, procedures and program processes. The following staff interviewed represented community centers, the Recreation Division, and the Athletics Division:

1. Debbie Robinson, Manager Recreation (South)
2. Adrienne Rouse, Manager Recreation (West)
3. Andy Chasanoff, Senior Recreational Therapist, PSTB Program
4. Sheila Hill, Recreational Therapist, Special Olympics Program
5. Melinda Wheatley, Senior Recreational Specialist, APLC/SPARKS
Key resources used for the development of the recommended policies and procedures include the following:

- Parks and Recreation Industry Best Practices
- Peer Reviews
- Staff interviews with Parks and Recreation Department personnel

The following pages provide recommended policies and procedures for use by the County.

*ADA Sensitivity Training at Northdale Facility*
4.3.1 Camp SPARKS/Inclusion Program

Below are recommended policies to strengthen existing Camp SPARKS/Inclusion Program policies, procedures and program processes.

a. General Payment Information

Fall and Spring Session (afterschool) monthly payments and outstanding balances are due to the Hillsborough County Parks and Recreation Department program site by 5:00 p.m. on the first of the month. Postmark dates are not accepted. If the first of the month falls on a weekend or holiday, payment is due the following business day by 5:00 p.m. Your child will be removed from the program and registration will be offered to another child on the waiting list if payment is not made by 5:00 p.m. on the first of the month.

Summer Camp session payment is due by 5:00 p.m. 21 days prior to the start of camp. Your child will be removed from the program and registration will be offered to another child on the waiting list if payment is not made by 5:00 p.m. 21 days prior to the start of camp.

Participants that pay a deposit for either after school or summer camp sessions are secured a position in that session until the remaining balance is due. Full payment instead of deposits is greatly encouraged. If you fail to pay the remaining balance, you will lose your deposit and forfeit your child’s placement in that session to another child on the waiting list.

<table>
<thead>
<tr>
<th>Deposit Due Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fall Session</td>
</tr>
<tr>
<td>Spring Session</td>
</tr>
<tr>
<td>Summer Camp Session</td>
</tr>
</tbody>
</table>

Please Note: All checks received by Hillsborough County Program sites are promptly processed. A fee will be charged for returned checks.

ALL DEPOSITS ARE NON-REFUNDABLE AND NON-TRANSFERABLE

b. Cancellations and Refunds

1. Failure to attend a class does not entitle you to a credit, proration, refund or transfer.
2. Registration cancellations requests received up to seven days prior to the first program meeting will receive a refund minus the processing fee at the Parks and Recreation program site, as well as any deposits. If the cost of the program is less than the processing fee, half the registration cost will be refunded.
3. Registration cancellations received less than seven days prior to the first class meeting will not be issued a refund.
4. Refunds will be issued to the credit card used in the initial transaction, by check from Hillsborough County (please allow 4-6 weeks for processing) or you can request to have the refund applied to your account.
5. Refunds will be applied to outstanding account balances before funds are released. Registration fees will be fully refunded if Parks and Recreation cancels the class.

c. Program Registration and Waiver Form
A Program Registration and Waiver Form must be completed and signed by a parent/guardian before a child may participate in a Parks and Recreation Department program. This form contains important contact and medical information about your child that is kept on file. Please include any requested accommodations.

d. Financial Aid
Our goal is to create positive experiences for Hillsborough County’s youth through access to Parks and Recreation Department programs. Financial assistance is available to households that qualify. Financial assistance can take up to three weeks to process, so apply in advance of program registration. Financial assistance cannot be applied to payments that have already been received. For more information about financial aid, visit our website at https://www.hillsboroughcounty.org/en/residents/recreation-and-culture/kids/after-school-and-summer-camp-financial-assistance or email us at _______.

e. Minimum Registration
Parks and Recreation Department reserves the right to cancel a class that does not meet the minimum enrollment requirement prior to the start date. If this occurs, you will be notified and a full refund will be issued.

f. Wait List
In accordance with the Local Standards of Care for Youth Recreational Programs, the maximum number of participants a program may serve is determined by a staff-to-participant ratio. When a program reaches full enrollment, interested participants are placed on a wait list and are notified, in the order they were placed on the wait list, as openings become available.

g. Childcare Licensing
Reference Florida’s Administrative Code.

Please Note: Hillsborough County Parks and Recreation staff is required to report any suspicion of abuse or neglect. If you have any questions regarding this policy, please contact your Hillsborough County program site.

h. Field Trips
If a field trip is scheduled, parents/guardians will be notified in advance. Participants must arrive before the departure time in order to participate in the program that day.
Participants will not be allowed to stay behind at the site if they arrive late or do not want to participate in the field trip. Fees for field trips may be an additional expense and must be paid in full. Schedules and destinations are subject to change.

i. Swimming
Parks and Recreation programs with swimming components will have schedules posted at the site. Participants will have an opportunity to pass a swim test allowing them to swim in the deep end and utilize the diving board. Participants that are unable to pass the swim test will be restricted to the shallow water. If a parent/guardian wants to join swim time, the child must be signed out of the program before swimming. Swimming schedules are subject to change.

j. Safety and Fire Drills
Parks and Recreation has emergency plans in effect at each program site in the event of inclement weather or other hazardous situations. Additionally, program sites conduct random fire drills. Staff is trained to provide cardio pulmonary resuscitation (CPR) and First Aid and staff at facilities with swimming activities is also trained in Basic Water Rescue.

k. Lost Participant Prevention
Staff is trained to prevent a lost participant, and to react timely and professionally. The opportunity for a lost participant incident to occur is greatly reduced by adhering to appropriate leader-to-participant ratios, the buddy system, and frequent head counts and rolls calls. As soon as staff realizes a participant is missing from the group, the following procedures are immediately activated:

1. Staff notes the exact time a participant was no longer with the group.
2. Staff identifies the participant who is lost and gathers details.
3. Staff informs the program supervisor of the situation.
4. While program staff continues to keep other participants together and safe, remaining staff searches for the participant, checking with the larger group often to determine if the participant has returned.
5. If the participant is not located within 10 minutes of the search, staff will contact 911 while the search continues.
6. Immediately following contacting 911, staff contacts the parent or guardian of the lost participant and informs them.

l. Sign-in/Sign-Out
Your child’s safety is our primary concern. Parents/guardians are required to escort participants into and out of the program site each day and sign each child in and out of the day’s activities. Other than a parent/guardian, only persons listed as “emergency and non-custodial release contacts” on the Registration and Waiver Form may pick up and sign out a child. Contact the program site for instructions on adding to the “non-custodial release contacts” list after the form has been submitted. Proper ID is required before staff will release a child. Teen participants are not allowed to leave without written permission.
m. Absence/Attendance
If your child is not attending the program on a given day, please inform the site. If Parks and Recreation have not been contacted by you, a courtesy call may be placed to confirm your child’s absence.

n. Personal Hygiene
Parks and Recreation staff is not permitted to physically assist with personal hygiene or the changing of a participant’s clothing. After a bathroom accident, staff will verbally guide a participant through the process of cleaning and changing while maintaining the participant’s privacy.

o. Items to Bring to Camp
Please bring a water bottle, sunscreen, insect repellant, lunch and two healthy snacks with your child. On days with pool activities, please bring swim clothing, towels and a change of clothes. Please label all personal items. Note: After-school participants that are transported from school to a Parks and Recreation program will be signed on by staff. If participants are not picked up by the program end time, a $1 per minute late fee may be charged.

p. Lunch/Snack
Participants must bring their own non-microwaveable, non-refrigerated lunch in a bag or cooler each day of camp. It is recommended that you provide your child with two healthy snacks to eat during daily designated snack times. Please mark your child’s lunch clearly with first and last name. Participants are not allowed to leave during lunch without a parent/guardian. Please do not bring glass containers.

q. Personal Belongings
Hillsborough County Parks and Recreation is not responsible for lost, damaged or stolen property. Participants shall NOT bring any valuable items to the program. Staff requires the attention of each participant; therefore participants are not allowed to use the following:

- Cell phones
- MP3 players and headphones
- Tablet or laptops
- Pocket or hand-held games
- Training or playing cards
- Other disruptive items

Digital or electronic devices may be used for some activities. This will only be on pre-determined days and advance notification will be provided.
r. **Appropriate Attire**
Participants are required to wear appropriate attire for program activities. Participants should NOT wear expensive clothing as many projects and activities may get wet or soiled. Closed-toe shoes are required for safety except for swim activities.

s. **Behavior Management Policy**
It is the policy of Hillsborough County Parks and Recreation Department to provide youth program participants a safe and hostile-free environment during their participation in Parks and Recreation Department programs. Participants are encouraged to participate in all activities. At all times, participants are expected to respect themselves, other participants, staff and Parks and Recreation Department property. Behaviors that endanger one oneself, other participants or staff are prohibited. Participants are expected to keep their hands and feet to themselves. Foul, vulgar or abusive language, disruptive behavior, running and/or shouting within buildings will not be allowed.

| The Parks and Recreation Department reserves the right to dismiss any youth from a program or facility without warning when it is determined that the youth’s unsafe behavior is a threat or places other participants or themselves and/or staff in danger. |

| t. **Disruptive Behavior Policy** |
This policy is designed to provide guidance as to handling youth disruptive and unsafe behavior displayed during a Parks and Recreation program or service. Guidance of youth must be consistent and based on an understanding of the program and individual needs. For the safety and consideration of all participants, Parks and Recreation expects youth program participants to follow program rules and respect other participants, staff and property.

The following guidelines will be used by Parks and Recreation Department staff to promote safety:

1. Staff will not use harsh, cruel corporal or humiliating punishment.
2. Staff will not use profane or abusive language in any circumstance.
3. Staff will not physically restrain a youth or place a youth in a locked, unsupervised room.
4. Staff may use brief, unsupervised separation from the group if necessary.
5. For any youth participant who demonstrates disruptive behavior or does not adhere to facility rules, the following procedure will be followed staff:
   a. Provide the youth participant a verbal warning and document the warning and the nature of the disruptive behavior in writing.
   b. Complete an Incident Report.
   c. Notify the participant’s parent/guardian or caregiver and provide details regarding the incident.
6. If a youth participant is removed from a program or facility for disruptive or unsafe behavior, then the Parks and Recreation Department reserves the right to:
   a. Withhold a refund of any fees for time remaining in a program to a participant that has been removed from the program or facility.
b. After multiple recorded incidents, prohibit further participation in Hillsborough County Parks and Recreations youth programs

u. Medication Release and Standards
Staff may not administer medication to a participant without a signed “Permission to Give Medication” form on file. Medication must be stored in its original container with the child’s given name, valid expiration date and correct dosage.

1. Staff may not accept more than a week’s worth of medication for a participant, not to exceed a 5-day supply. To clarify, if a program meets once a week, staff can only accept medication in the quantity necessary to that single occurrence. Any unused medication shall be returned to the parent/guardian on the last day of the program.

2. Staff may not administer an injection except for an epinephrine auto injector device, which can only be administered during an emergency by trained staff. In addition, medication that is inconsistent with the prescribed dosage cannot be administered by staff.

3. Staff must keep medication in a secured location that is only accessible by staff.

4. Staff will maintain a medication log that includes the name of the child to whom the medication is administered, the time the medication is dispensed and the name of the person dispensing the medication.

v. Illness/Injury
If a child becomes ill or has an oral temperature of 100.4 degrees or greater, staff will call the phone number listed on the Registration and Waiver Form so that your child can be picked up from the program. If a child becomes seriously injured, staff will contact the parent/guardian and call 911 for emergency assistance.

Paralympic Sports Tampa Bay Program Participant
### Figure 4: Illness Reference Chart

<table>
<thead>
<tr>
<th>Illness/Infection Symptom</th>
<th>Should You Stay Home?</th>
<th>When Participant Can Return?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chicken Pox</td>
<td>YES</td>
<td>When all pox are scabbed</td>
</tr>
<tr>
<td>Cold</td>
<td>No (without fever)</td>
<td>See fever</td>
</tr>
<tr>
<td>Coxsackie (hand, mouth and foot disease)</td>
<td>YES (with fever)</td>
<td></td>
</tr>
<tr>
<td>Diarrhea</td>
<td>YES</td>
<td>12 hours after last diarrhea</td>
</tr>
<tr>
<td>Ear Infection</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Fever (undiagnosed illness) 100.4 or greater</td>
<td>YES</td>
<td>24 hours after fever subsides and fever reducing medications have not been given in the past 8 hours</td>
</tr>
<tr>
<td>Giardia</td>
<td>YES</td>
<td>When diarrhea subsides or when doctor approves return</td>
</tr>
<tr>
<td>Impetigo</td>
<td>YES</td>
<td>When treatment has begun</td>
</tr>
<tr>
<td>Lice</td>
<td>YES</td>
<td>When one treatment has been given</td>
</tr>
<tr>
<td>Pink Eye</td>
<td>YES</td>
<td>24 hours after treatment has begun</td>
</tr>
<tr>
<td>Unidentified Rash</td>
<td>YES</td>
<td>When rash is gone unless doctor approves return</td>
</tr>
<tr>
<td>Ring Worm</td>
<td>No (keep area covered)</td>
<td></td>
</tr>
<tr>
<td>Roseola</td>
<td>YES (with fever)</td>
<td>See fever</td>
</tr>
<tr>
<td>Rotavirus</td>
<td>YES</td>
<td>When diarrhea subsides or doctor approves return</td>
</tr>
<tr>
<td>Strep Throat/Scarlet</td>
<td>YES</td>
<td>24 hours after treatment has begun and fever-free</td>
</tr>
<tr>
<td>Thrush</td>
<td>No (seek treatment)</td>
<td></td>
</tr>
<tr>
<td>Vomiting</td>
<td>YES</td>
<td>12 hours after vomiting</td>
</tr>
</tbody>
</table>
FREQUENTLY ASKED QUESTIONS

1. If my child does not attend the program every day, can my fee be prorated?
   No. Attendance is the responsibility of the participant. Failure to attend a class does not entitle you to a refund. Make-ups are not available and fees are not prorated for absences.

2. How should I dress my child?
   Wear comfortable clothing appropriate for activities and movement such as t-shirts, pants or shorts and sneakers.

3. Do I need to sign-in my child in and out every day?
   Yes. Safety is our first concern; therefore we require that you sign-in and sign-out your child every day.

4. Can a neighbor, friend or relative pick up my child?
   Yes, but the child must be signed in/out by a designated person on the child’s Registration and Waiver Form (photo ID required). Changes or additions to the “Emergency and Non-Custodial Release Contact” list can only be made by the instructions provided by the Hillsborough County Parks and Recreation program site.

5. If I am in a hurry, can you send my child out to meet me at the curb?
   No. Safety is our first concern; therefore, we require you to sign-in and sign-out your child every day. Participants will not be allowed to run out to the car or wait at the curb.

6. Can you give my child aspirin for a headache?
   No. If your child needs to take any type of medication (prescribed or non-prescribed), a Permission to Give Medication form must be provided by the parent/guardian.

7. Why can’t my child bring his/her digital device?
   Hillsborough County Parks and Recreation is not responsible for any lost, damaged or stolen property. Our staff requires your child and electronics devices brought from home can also be distracting to other students and staff. Exceptions may apply to teen programming. Please check with your program site for more information.

8. Under what circumstances can my child be removed from a program?
   While Hillsborough County Parks and Recreation makes every effort to ensure the success of each participant, staff reserves the right to remove any participant from a program or facility that participates in disruptive, threatening or unsafe behavior that places the participant, other participants or staff in danger.
4.3.2 Special Olympics

The following is a general policy statement that should be used by the County for the Special Olympics Program:

“The Hillsborough County Parks and Recreation Department will adhere to Special Olympics Florida guidelines for administration of the program. These guidelines include Identification for Eligibility Competition as set forth in Special Olympics Florida Sports Information Guide 2010 – 20100 Section 2. Applications and the Athlete Medical Waiver Forms and General Orientation prescribed by Special Olympics will be utilized.

Training of Parks and Recreation staff will adhere to the Special Olympics of Florida and a curriculum will be developed by the Parks and Recreation Department that mirror these requirements. Initial training for new employees and on-going training of program personnel shall be conducted and documented by topic and by hours and acknowledged (signed and dated) by the trainer.”


---

3 Special Olympics Florida Sports Information Guide 2010-2011 Section 2
ATHLETE ELIGIBILITY

ATHLETE OATH: “Let me win. But if I cannot win, let me be brave in the attempt.”

SECTION I - STATEMENT OF ELIGIBILITY FOR SPECIAL OLYMPICS
(excerpt from the Official Special Olympics Sport Rules)

1. General Statement of Eligibility. Special Olympics training and competition is open to every person with intellectual disabilities who is at least eight years of age and who registers to participate in Special Olympics as required by the General Rules.

2. Age Requirements. There is no maximum age limitation for participation in Special Olympics. The minimum age requirement for participation in Special Olympics competition is eight years of age. An Accredited Program may permit children who are at least six years old to participate in age-appropriate Special Olympics training programs offered by that Accredited Program, or in specific (and age-appropriate) cultural or social activities offered during the course of a Special Olympics event. Such children may be recognized for their participation in such training or other non-competition activities through certificates of participation, or through other types of recognition approved by SOI which are not associated with participation in Special Olympics competition. However, no child may participate in a Special Olympics competition (or be awarded medals or ribbons associated with competition) before his or her eighth birthday.

3. Degree of Disability. Participation in Special Olympics training and competition is open to all persons with intellectual disabilities who meet the age requirements, regardless of the level or degree of that person’s disability, and whether or not that person also has other intellectual or physical disabilities, so long as that person registers to participate in Special Olympics as required by the General Rules.

4. Identifying Persons with Intellectual Disabilities. A person is considered to have intellectual disabilities for purposes of determining his or her eligibility to participate in Special Olympics if that person satisfies any one of the following requirements:
   a. The person has been identified by an agency or professional as having intellectual disabilities as determined by their localities; or
   b. The person has a cognitive delay, as determined by standardized measures such as intelligent quotient or "IQ" testing or other measures that are generally accepted within the professional community in that Accredited Program’s nation as being a reliable measurement of the existence of a cognitive delay; or
   c. The person has a closely related developmental disability. A "closely related developmental disability" means having functional limitations in both cognitive skills and practical adaptive skills (such as in conceptual skills, social skills, recreation, work, independent living, self-direction, or self-care). However, persons whose functional limitations are based solely on a physical, behavioral, or emotional disability, or a specific learning or sensory disability, are not eligible to participate as Special Olympics athletes, but may be eligible to volunteer for Special Olympics as partners in Unified Sports®, if they otherwise meet the separate eligibility requirements for participation in Unified Sports® set forth in the Sports Rules.
5. Preserving Flexibility in Identifying Eligible Athletes. An Accredited Program may request limited permission from SOI to depart from the eligibility requirements specified above if the Accredited Program believes that there are exceptional circumstances that warrant such a departure and so notifies SOI in writing. SOI will consider such requests promptly, but shall have the final authority to determine whether any departure or exception is appropriate.

6. Multiple Handicaps. Persons who have multiple handicaps may participate in Special Olympics provided they are eligible under Section L of the Special Olympics Sports Rules.

Participation by Individuals with Down Syndrome Who Have Atlanto-axial Instability. (article I, Section F, Special Olympics Sports Rules)

In light of medical research indicating that up to 15% of individuals with Down syndrome have a mal-alignment of the cervical vertebrae C-1 and C-2 in the neck known as Atlanto-axial instability, exposing them to possible injury if they participate in activities that hyperextend or radically flex the neck or upper spine, all Accredited Programs must take the following precautions before permitting athletes with Down syndrome to participate in certain physical activities:

1) Athletes with Down syndrome may participate in most Special Olympics sports training and competition, but shall not be permitted to participate in any activities which, by their nature, result in hyper-extension, radical flexion or direct pressure on the neck or upper spine, unless the requirements of subsections (2) and (3) below are satisfied. Such sports training and competition activities include: butterfly stroke and diving starts in swimming, diving, pentathlon, high jump, squat lifts, equestrian sports, artistic gymnastics, football (soccer), alpine skiing and any warm-up exercise placing undue stress on the head and neck.

2) An athlete with Down syndrome may be permitted to participate in the activities described in subsection (1) above if that athlete is examined (including x-ray views of full extension and flexion of neck) by a physician who has been briefed on the nature of the Atlanto-axial instability condition, and who determines, based on the results of that examination, that the athlete does not have an Atlanto-axial instability condition.

3) An athlete with Down syndrome who has been diagnosed by a physician as having an Atlanto-axial instability condition may nevertheless be permitted to participate in the activities described in subsection (1) above if the athlete, or the parent or guardian of a minor athlete, confirms in writing his or her decision to proceed with these activities notwithstanding the risks created by the Atlanto-axial instability, and two (2) Licensed Medical Professionals certify in writing that they have explained these risks to the athlete and his/her parent or guardian, and that the athlete’s condition does not, in their judgment, preclude the athlete from participating in Special Olympics. These statements and certifications shall be documented and provided to Accredited Programs using the standardized form approved by SOI, entitled “Special Release for Athletes with Atlanto-axial Instability,” and any revisions of that form, approved by SOI (the “Special Release Concerning Atlanto-axial Instability”).
IDENTIFICATION FOR ELIGIBILITY FOR COMPETITION

The person is 8 years of age or older and...

Is identified by agency or professional as having Intellectual Disability?

Has a cognitive delay determined by acceptable standardized test or other measures?

Is identified as having closely related developmental disability with functional limitations in both general learning skills and adaptive skills?

YES

YES

NO

NO

YES

NO

IF YES, IS ELIGIBLE for Special Olympics

But the functional limitations are only due to:
physical disabilities, emotional disturbances, behavior disorders, specific learning disabilities, visual impairments, or sensory disabilities?

IF NO, IS ELIGIBLE for Special Olympics

IF YES, IS NOT ELIGIBLE for Special Olympics

Special Olympics Florida Sports Information Guide 2010-2011 Section 2
### 4.3.3 Paralympic Sports Tampa Bay (PSTB)

The following is a general policy statement that should be used by the County for the Paralympic Sports Tampa Bay program.

“The Hillsborough County Parks and Recreation Department will adhere to guidelines of the Paralympic Division of the United States guidelines in the execution of this program. Training of Parks and Recreation staff on these guidelines will adhere to the guidelines of the Paralympic Division of the United States. A schedule and training curriculum will be developed by the Parks and Recreation Department and will be adhered to for initial training of new employees and on-going training of existing program personnel. This training will be documented by topic and ours and acknowledged (signed and dated) by the trainer.”

*PSTB Wheelchair Basketball Participants*
4.3.4 Summer Camp 2018 Parent Handbook and Camp SPARKS Parent Handbook

The Camp SPARKS/Inclusion Program recommendations can also be used to update and strengthen the existing Summer Camp 2018 Parent Handbook and the 2016-2017 Camp SPARKS Parent Handbook as follows:

A Table of Contents and Frequently Asked Questions should be added to both documents for quick reference. Currently, neither of the two documents have a Table of Contents. The two documents could be combined into one and referred to as “Youth Programs Parent/Guardian Handbook.”

**Cover Page (Page 1)**

1. Change the name of the document to include all youth programs; i.e. “Youth Programs Parent/Guardian Handbook.”

2. Add the CAPRA accreditation logo to the lower right corner of the handbook.

**Inside Cover Page Welcome Letter (Page 2)**

3. Change the salutation to “Dear Parents and Guardians:“

Welcome and thank you for choosing Hillsborough County Parks and Recreation to be a part of your family’s recreation activities. Our goal is to provide your child with new and exciting experiences through supervised and structured activities in a safe and welcoming environment.

We have assembled an outstanding team of dedicated staff to care for and engage your child to promote a positive experience. On any given day, your child may participate in arts and crafts, theatre, sports, dance, outdoor adventures, nature exploration and strategic games. It is our hope that your child develops lasting relationships with new friends and mentors.

This handbook is designed to assist you in preparing your child for our youth programs and to answer a variety of frequently asked questions. We encourage you to read the handbook and use it as a helpful resource.

Again thank you for choosing Hillsborough County Parks and Recreation!

Sincerely,

Rick Valdez, Director
Hillsborough County Parks and Recreation Department

**Note:** The publication should be developed using Hillsborough County branding guidelines for publications. The online version of Table of Contents should adhere to Website Accessibility guidelines under Title II of the ADA.
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5. Parks and Recreation Mission, Vision, Guiding Principles (Page 4)
4.4 Additional Recommendations for Model Policies

Below are additional recommendations for model policies based on the Self-Evaluation Survey findings of the 144 parks surveyed and items of deficiency. Key resources utilized for developing these recommendations include the following:

- 2010 Department of Justice (DOJ) ADA Standards for Accessible Design (ADASAD)
- 2013 U.S. Access Board (ABA) Accessibility Guidelines for Outdoor Developed Areas, 36 Part 1191 (AODA)

### PLAY AREAS -1

**I. Preamble**

A. All park locations that have any number of play components designed and constructed for play, socialization, or learning by children is considered a play area. In play areas it is important that accessible equipment be integrated with non-accessible equipment. While not every piece of play equipment needs to be accessible, when non-accessible components stand alongside accessible ones, it promotes social interaction between children.

B. Play components can be either elevated or ground level, made of manufactured or natural materials, and may be “stand alone” or part of a composite play structure.

1. Ground level play components are those that are approached and existed at ground level (i.e. spring rockers, swings, diggers, free-standing slides, and climbers).
   **ADA SAD 240.2.1 Advisory**

2. Play components that are attached to a composite play structure which provides more than one play activity, and can be approached above or below grade from a platform or deck are considered elevated play components.
   **ADASAD 240.2.2 Advisory**

3. Soft, contained play structures are made up of one or more components where the user enters a fully enclosed play environment that utilizes pliable materials such as plastic, netting or fabric.

C. Accessible surfaces and routes inside play areas have different criteria than accessible surfaces and routes elsewhere. Certain surfaces must meet stringent safety standards put forth by the American Society for Testing and Materials. To ensure compliance with all codes and standards it is important Hillsborough County Parks and Recreation Department leaders and project managers collaborate with the County’s ADA Office for guidance whenever work on a new or existing play areas is planned.
II. General
   A. All newly constructed play areas designed for children ages two and over or altered portions of existing play areas shall be accessible.
      ADASAD 202.1, 240.1

      1. Where play components are relocated in existing play areas for the purpose of creating safe zones or where play components are altered and the ground surface is not altered, the ground surface inside the play area shall not be required to be modified for accessibility.
      ADASAD 240.1 Exception 2

   B. Where ground level play components are provided, at least one of each type shall be on an accessible route.
      ADASAD 240.2.111

   C. Where elevated play components are provided, at least 50% shall be on an accessible route.
      ADASAD 240.2.2

   D. Accessible routes serving play area shall comply with Routes of Travel.
      ADASAD 1008.2

   E. Depending on the total number of play components provided, additional requirements may be necessary.

III. Accessible Routes in Play Areas
      ADASAD 1008.2.6.1

   B. The use zone is the ground level area beneath and immediately adjacent to a play structure or play equipment. This is the surface upon which it is predicted a user would land on when falling or exiting the equipment and these surfaces are required to comply with the ASTM “F 1292 Standard Specifications for Impact Attenuation of Surface Systems Under and Around Playground Equipment.”
      ADASAD 1008.2.6.2

   C. Ground Level Accessible Routes
      1. Accessible routes serving ground level play components shall have a vertical clearance of 80” high minimum.
         ADASAD 1008.2
2. The clear width of the ground level accessible route shall be 60” minimum with the following exceptions:
   a. In play areas less than 1,000 square feet, the clear width may be reduced to 44” minimum, if at least one turning space that is a 60” diameter circle or T-shape, is provided every 30’.
   ADASAD 1008.2.4.1 Exception 1

   ![Figure 6: Play Area T-Shape Turning Space](image)

   b. The clear width of accessible routes may be reduced to 36” minimum for a distance of 60” maximum provided that multiple reduced width segments are separated by segments that are 60” wide minimum for at least 60” in length minimum.
   ADASAD 1008.2.4.1 Exception 2

D. Elevated Accessible Routes
   1. Where transfer systems are provided, an elevated play component shall be permitted to connect to another elevated play component as part of an accessible route. However, where 20 or more elevated play components are provided, no more than 25% of the elevated components are permitted to be connected by transfer systems.
   ADASAD 1008.2.1 Exception 1 and 2

   2. Platform lifts in compliance with all other applicable state and local codes shall be permitted to be used as part of an accessible route.
   ADASAD 402.2

   3. The clear width of accessible routes connecting elevated play components shall be 36” minimum with the following exceptions:
a. The clear width of accessible routes connecting elevated play components may be reduced to 32” minimum for a distance of 24” maximum, provided that reduced width segments are separated by segments that are 48” long minimum and 36” wide minimum. 
**ADASAD 1008.2.4.2 Exception 1**

b. The clear width of transfer systems connecting elevated play components shall be permitted to be 24” minimum. 
**ADASAD 1008.2.4.2 Exception 2**

### IV. Ramps in Play Areas

A. Within play areas, ramps connecting ground level play components shall comply with the following:

1. The maximum slope on ramps connecting ground level play components shall be 6.25%
   **ADASAD 1008.2.5.1**

2. The maximum rise for any ramp run shall not exceed 12”.be 6.25%
   **ADASAD 1008.2.5.2**

3. Where required on ramps serving play components, the handrails shall comply with Ramps.

### V. Handrails in Play Areas

A. Handrails shall comply with Ramps except as follows:

1. Handrails are not required on ramps located within ground use zones.
   **ADASAD 1008.2.5.3 Exception 1**

2. Handrail extensions are not required in play areas.
   **ADASAD 1008.2.5.3 Exception 2**

3. Handrail gripping surfaces with a circular cross section shall have an outside diameter of 0.95” minimum and 1.55” maximum. Where the shape of the gripping surface is non-circular, the handrail shall provide an equivalent gripping surface.
   **ADASAD 1008.2.5.3.1**

4. The top of the handrail gripping surface shall be 20” minimum to 28” maximum above the ramp surface.
   **ADASAD 1008.2.5.3.2**

### VI. Transfer Platforms in Play Areas

A. Where transfer is intended to be from a wheelchair or other mobility device, transfer platforms shall be provided.
   **ADASAD 1008.3.1**
B. Transfer platforms shall have level surfaces 14” deep minimum and 24” wide minimum. Height of transfer platforms shall be 11” minimum and 18” maximum above the ground or floor surface. 

ADASAD 1008.3.1.1-2

C. A clear and level 30” by 48” transfer space shall be provided to the transfer platform. The 48” long dimension of the transfer space shall be centered parallel to the 24” side of the transfer platform. The side of the transfer platform serving the transfer space shall be unobstructed.

ADASAD 1008.3.1.3

D. A means of support such as handrails, handgrips or custom designed handholds shall be provided at each level where transferring is the intended method of access.

ADASAD 1008.3.1.4

VII. Transfer Steps

A. Transfer steps shall be provided where movement is intended from a transfer platform to a level with elevated play components that is required to be on an accessible route.

ADASAD 1008.3.2

B. Transfer steps shall have level surfaces, 14” deep minimum, 24” wide minimum and each step shall have a maximum height of 8”.

ADASAD 1008.3.3.1-2

C. A means of support such as a loop type handle, poles, bars or customer designed handholds shall be provided at each step where transferring is the intended method of access.

ADASAD 1008.3.2.3

VIII. Play Components

A. Where elevated play components are provided, ground level play components shall be provided in accordance with Figure 5: Number and Types of Ground Level Play Components Required to be on Accessible Routes:

ADASAD 240.2.1.2
Figure 7: Number and Types of Ground-Level Play Components Required to be on Accessible Routes

<table>
<thead>
<tr>
<th>Number of Elevated Play components Provided</th>
<th>Minimum Number of Ground Level Play Components Required to be on Accessible Route</th>
<th>Minimum Number of Different Types of Ground Level Play Components Required to be on Accessible Route</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>2 to 4</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>5 to 7</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>8 to 10</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>11 to 13</td>
<td>4</td>
<td>3</td>
</tr>
<tr>
<td>14 to 16</td>
<td>5</td>
<td>3</td>
</tr>
<tr>
<td>17 to 19</td>
<td>6</td>
<td>3</td>
</tr>
<tr>
<td>20 to 22</td>
<td>7</td>
<td>4</td>
</tr>
<tr>
<td>23 to 25</td>
<td>8</td>
<td>4</td>
</tr>
<tr>
<td>More than 25</td>
<td>8 plus 1 for each additional 3 over 25, or fraction thereof</td>
<td>5</td>
</tr>
</tbody>
</table>

**Exception:** If at least 50% of the elevated play components are connected by a ramp and if at least 3 of the elevated play components connected by the ramp are different types of play components, the above chart shall not apply. **ADASAD 240.2.1.2 Exception**

B. Where two or more required ground level play components are provided, they shall be dispersed throughout the play area and integrated with other play components.

**ADASAD 240.2.1**

1. Where a stand-alone slide is provided, an accessible route must connect the base of the stairs at the entry point to the exit point of the slide. Where a sandbox is provided, an accessible route must connect to the border of the sand box.

**ADASAD 240.2.1 Advisory**

C. At least one turning space shall be provided on the same level as play components

**ADASAD 1008.4.1**

D. A clear floor or ground space shall be provided at each play component.

**ADASAD 1008.4.2**

E. Where play tables are provided, knee clearance 24” high minimum, 17” deep minimum, and 30” wide minimum shall be provided. The top of table rims, curbs or other obstructions shall be 31” high maximum.

**ADASAD 1008.4.3**

1. Play tables designed or constructed primarily for children ages 5 and under shall not be required to provide knee clearance if the clear floor or ground space is arranged for a parallel approach.

**ADASAD 1008.4.3 Exception**
F. With the exception of entry points on slides, where play components require transfer to entry points or seats, the entry points or seats shall be 11” minimum and 24” maximum from the clear floor or ground space. Where play components require transfer to entry points or seats, at least one means of support for transferring shall be provided.

ADASAD 1008.4.4-5

CONCESSIONS - 2

I. Preamble

A. All concessions in Hillsborough County parks must provide access for visitors with disabilities.

B. Concession operators are responsible to remove physical barrier to accessibility at the facilities they operate and to provide access to programs and services they offer.

C. The Parks and Recreation Department is responsible to monitor concessionaire progress toward achieving accessibility compliance.

II. General

A. All new concessions, whether in a new or existing facility, shall be fully accessible prior to beginning operations.

B. All existing concessionaires shall actively pursue barrier removal utilizing the approval processes described in their concession contract.

C. All new concessionaires that take over operation of an existing non-compliant concession must remove all barriers to access within one year of beginning operations.

D. Parks and Recreation shall ensure that construction projects undertaken by concessionaires are reviewed for compliance by the accessibility division or the County’s ADA Compliance Officer.

E. Activities offered by concessions, such as but not limited to, walking tours, equipment rentals and educations programs, must provide access or equivalent facilitation to ensure opportunities for equal participation by people with disabilities.

F. Services machine used in concessions, including fee collection machines, vending machines, and interactive computers, must comply with appropriate standards.

G. All concessions contracts held by the County will be in compliance with accessibility standards established by Federal, State and County mandates. All new or renewed concession contracts must include the following paragraphs:
“Without limiting concessionaire’s responsibility under this contract for compliance with all laws, with regards to all operations and activities that are the responsibility of the concessionaire under this contract, Concessionaire shall be solely responsible for complying with the requirements of the Americans with Disabilities Act of 1990 (ADA) (Public Law 101 336, commencing at Section 12101 of Title 42, United States Code; and including Titles I, II and III of that law) and the Rehabilitation Act of 1073, and all related regulations, guidelines, and amendments to both laws.”

“With regard to facilities for which Concessionaire is responsible for operation, maintenance, construction, restoration, or renovation under this Contract, Concessionaire also shall be responsible for compliance with Hillsborough County’s codes and other applicable laws including the 2010 ADA Design Standards. Written approval from the County is required prior to implementation of any plans to comply with accessibility requirements. These facilities must be compliant with the 2010 Standards for Accessible Design.”

### DRINKING FOUNTAINS - 3

**I. Preamble**

A. Where drinking fountains are provided, there shall be accessible drinking fountains.  
   ADASAD 602.1

B. The drinking fountain must be on an accessible path of travel.

**II. Wall-Mounted Units and Post-Mounted Units**

A. Where only one drinking fountain is provided, at least 50% must be accessible.  
   ADASAD 211.2 Exception

B. If more than one drinking fountain is provided, at least 50% must be accessible.  
   ADASAD 211.3

C. The fountain shall not encroach into an accessible route.

D. There shall be a clear, level space of at least 30” x 48” in front of the fountain to allow for a forward approach.  
   ADASAD 602.2
E. The fixture shall be a minimum 18” deep, maximum 19” deep

F. Clear knee space beneath the fountain shall be a minimum of 27 “ high

<table>
<thead>
<tr>
<th>FIXED BENCHES - 4</th>
</tr>
</thead>
</table>

I. Preamble

A. Fixed Benches, where provided must be made accessible for users with various types of disabilities.
   AGODA 1011.1

B. At least 20%, but not less than one, of the fixed benches being provided in a facility or building shall be accessible and shall be dispersed among the types provided.
   AGODA F245.3

C. Benches required to be accessible shall be adjacent to an accessible route of travel.

II. Clear Spaces

A. The surface around the accessible bench shall be firm and stable.
   AGODA 1011.2.2

B. A minimum area of 30” x 48” shall be provided at one end of the fixed bench so that a wheelchair user may be seated shoulder-to-shoulder with an individual seated on the bench (shoulder alignment point of the wheelchair space shall be measured 36” from the front of the wheelchair space.
   ADASAD 903.2

C. Clear spaces shall have a slope that does not exceed 2% in any direction (if necessary for proper drainage, when the surface is other than asphalt, concrete or boards, 5% maximum is allowed).
   AGODA 1011.2.3
There shall be a clear, level space of at least 30” x 48” in front of the fountain to allow for a forward approach.

**ADASAD 602.2**

### EXHIBITS - 5

#### I. Preamble

A. Exhibits are a fundamental means to inspire and educate. Making exhibits accessible requires careful planning to ensure that visitors can not only physically access the information provided, but that the information provided meets the varied abilities if visitors.

#### II. Exhibit Placement

A. Exhibits shall be placed along an accessible route.
   a. Exhibits at non-accessible features shall have an alternate format of the exhibit available at an accessible location.

B. Exhibits shall be placed adjacent to a clear floor or ground space for whether a forward or parallel approach.
   a. Clear space for exhibits placed outdoors along accessible routes should be adjacent to and outside the regular path of travel so that people who stop to examine the exhibit do not impede the passage of others.

C. Exhibits shall be within prescribed protrusion limits.

D. Exhibit protective railings shall not be higher than 36” and shall not obstruct the line of vision of a person in a wheelchair.

#### III. Exhibit Content

A. Layout
   1. Text must be well-balanced with graphics or pictures and empty space. Language used in exhibits should not be overly wordy or technical. It should be straightforward, relevant, and easy to comprehend for people of all abilities.

   2. Words are easier to read in horizontal lines. Artistic word shapes must be kept to a minimum or repeated in linear format.
3. Letter spacing shall be measured between the two closest points of adjacent letters, excluding words spaces. Spacing between individual letters shall be 10% minimum and 35% maximum of font height.

**ADASAD 703.5.8**

4. Spacing between the baselines of sentences within a body of text (leading) shall be 135% minimum and 170% maximum of font height.

**ADASAD 703.5.9**

5. Maintain a line length between 45 and 60 characters with margins flush left and ragged right is optimal. Where columns of text are used, space between the columns must be large enough so viewers do not read across columns.

6. Finishers shall be non-glare, eggshell or matte. Text screened directly onto clear glass or Plexiglas is very difficult to see and shall not be used.

7. Exhibit labels in cases or on shelves shall be placed at readable heights and angles for persons who are seated or standing. Avoid placing labels flat on horizontal shelf surface. Labels placed at 45 degree angles to front plane of case are generally easier to see.

B. Font

1. Font Family – The font family used for exhibits, panels, labels, maps, audiovisuals, and digital media shall be legible for persons with varied levels of vision.

   a. Preferred font families include sans serif fonts. Some examples of sans serif font families include: Arial, Franklin Gothic Book, Lucida Sans, Myriad Pro, Tahoma, and Trebuchet MS.

   b. Some examples if serif font families that work well include: Adobe Caslon, Pro, Bodoni MT, Century Schoolbook, and Garamond.

   c. The number of font families in a given exhibit should not exceed two or three.

2. Font Styles – All caps, bold, and italic are difficult to read when used for entire blocks of text. Instead, limit the use of these styles to accent or emphasize important information.

**ADASAD 703.5.3**

**Note:** Hillsborough County has branding guidelines that are limited to Calibri Regular, Soleto Regular, Museo Sans, Freight Sans Pro, and Segoe UI.
3. Font Proportions – Avoid fonts that are very heavy, very thin, or decorative and those with letters that are either very close together or widely spaced.

C. Contrast
1. Font and their background shall have a non-glare finish. Fonts shall contrast with their background with either dark fonts on a light background or light fonts on a dark background.

ADASAD 703.5.1

2. Placing text over images or patterns forces the readers’ eyes to constantly adjust to varying contrasts and greatly reduces legibility for those with visual or learning disabilities. Use screens or place text over a solid background to achieve the recommended minimum contrast.

4.5 Design Process Recommended Policy

If it has not already done so, the Parks and Recreation Department should revise its consultant contracts to include specific information regarding ADA compliance as part of the design process. The following are recommendations:

Scope of Work and Consultant’s Services and Responsibilities

“Comply with the 2010 Americans with Disabilities Act (ADA) Standards for Accessible Design or the most current ADA Standards. If a conflict exists between any code or standard the most stringent solution will be adopted. The consultant will utilize the County’s compliance team. All park elements/design features must be on an accessible route. Final bid documents shall have all ADA compliance documented including but not limited to accessible routes of travel, clear zones and slopes. All landscape, structural, mechanical, electrical system, known utilities, ADA issues and LEED directions shall be defined with specificity and shall be compatible with each other and the completed project.”
5. Conclusion

Hillsborough County Department of Parks and Recreation Department plays an important role in the life of the community. The Transition Plan provides a roadmap to compliance with the 2010 ADA Standards for Accessible Design and combines the findings of the Self-Evaluation Survey of 144 park facilities and the ADA Self-Evaluation Report.

Specific policy and program recommendations are included in this Transition Plan. Architectural modifications required to make programs accessible are also included. Each one of the 144 facility reports contains a complete listing of architectural barriers and barrier removal actions. Not all of these barriers must be removed to provide program access. The first priority is to remove those barriers limiting access to programs and services.

As Hillsborough County continues the process of modifying its park facilities to transition to the 2010 ADA Standards for Accessible Design to enhance program accessibility, it is important to note that if there is more than one facility available (such as when several ball fields are provided) only some of the facilities may need to be accessible. However, when only some of the ball fields are accessible, the scheduling policies for their use will need to accommodate requests for accessible fields, player areas, or spectator seating.

When facilities are built or altered, they must comply with the ADA 2010 Design Standards, which have technical requirements for elements and spaces, such as accessible parking spaces, accessible routes, toilet facilities, and spectator seating. For elements and spaces without technical standards, such as ball fields or playing areas, the County should use the ADA 2010 Design Standards as a guide, providing a reasonable number, but at least one that is accessible and providing an accessible route to the area of play and the spectator areas.

The 2010 ADA Design Standards provide guidelines for features in park environments. Park features should be integrated into an overall park site plan and be considered as part of a larger planning process for accessibility. Site planning is important to the process of providing access to all programs and services that the park offers. Each site should be planned as a whole to form a well-integrated, accessible network of facilities and programs. A key goal should be to provide all visitors with optimum experiences through individual choice. For example, if picnic areas provide some sites in the sun, some in the shade and some over-looking a lake, then accessible sites should be developed in each location rather than offering a limited selection. Partial accessibility does not provide for optimum experiences through individual choice.

No program or facility can function independent of its linkages to the natural, social and physical environment to which it belongs. Similarly, no program or facility can be accessible by itself. If a park provides major programs in different areas, accessible circulation must be provided to connect each of these areas, facilities and activities, rather than restricting visitors with disabilities to using only selected areas and programs.
As Hillsborough County Parks and Recreation transitions its park facilities to meet the requirements of the 2010 ADA Design Standards, all public use facilities, furnishings and equipment (i.e., shelters, picnic tables, drinking fountains, etc.) when purchased, leased or rented by the Department must be of the accessible variety. In addition, new development, including modifications to existing facilities should be designed in accordance with these guidelines.

5.1 Adoption of the ADA Transition Plan

The ADA Transition Plan should be formally adopted by the Hillsborough County Board of County Commissioners.

5.2 Facility Improvements Schedule and Action Plan for Removal of Barriers

The County Parks and Recreation Department will need to develop an action plan with a schedule based upon the priority ranking of the barriers, parks that are highly used, projects that may have generated accessibility complaints projects, and the County’s budget. A proposed schedule for implementation should be identified and an ADA project status timeline should be developed.

Title II regulations state that if a Transition Plan will take more than one year to fully implement, it must contain interim steps that will be taken during each year of the transition period to provide program accessibility and compliance with the regulations. The County will need to develop a strategy for removing barriers at park facilities identified. The County should reserve the right to modify barrier removal priorities to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in County programs, and funding opportunities and constraints. The barrier removal strategy should incorporate flexibility in the process and allow the County to respond to new opportunities as they arise.

A schedule of completion should also be completed along with budget impact. At a minimum, the Action Plan should have a designated coordinator and the plan should assign responsibilities to individuals to coordinate removal of barriers identified at each park facility.

5.3 Departmental ADA Coordinator

Hillsborough County has appointed a County-wide ADA Officer as required by the ADA law; however due to the numerous recreation programs for persons with disabilities, the County should create a position designating a Parks and Recreation Department ADA compliance coordinator to work closely with the County-wide ADA Office to continue to identify Department policies that may pose barriers to persons with disabilities from participation in Parks and Recreation programs and services. The Parks and Recreation Department ADA compliance coordinator should also review policies on an on-going basis to ensure that training of frontline personnel on Department’s policies and procedures is conducted. The ADA Coordinator should also proactively conduct ongoing scheduled site visits (quarterly) to park facilities to proactively identify barrier to accessibility before complaints are made by visitors. The County’s ADA Compliance Office and the Department’s ADA compliance staff person should be responsible for ensuring barrier removal at each park facility.
5.4 Implementation and Update of the ADA Transition Plan

The ADA Transition Plan should be considered a dynamic document that should be updated each year by the Department’s compliance official in coordination with the County’s ADA Office. A formal report should be provided to the Board of County Commissioners periodically to provide an update on progress and milestones achieved. With the completion of the Self-Evaluation Survey and the Transition Plan, Hillsborough County must continue to maintain staff understanding of ADA needs and laws.

The County will need to begin funding the tasks that can be completed through the maintenance program. In addition, the County will designate the Parks and Recreation Department official responsible for implementation of the plan. This Department’s compliance official should also be responsible for coordinating the implementation of the Plan.

The County’s Budget Office should be a critical part of funding the projects identified in the ADA Transition Plan that do not meet compliance with the 2010 Standards for Accessible Design in order to accurately budget and plan future accessibility projects as the Parks and Recreation Department transitions all parks to meet the 2010 ADA Standards for Accessible Design.

As new projects are proposed for ADA-focused improvements beyond the items included in this Transition Plan, the Parks and Recreation Department should consider a project scoring criteria, to help determine project prioritization. Below is a sample description of the proposed scoring criteria:

**Figure 9: Sample Scoring Criteria and Weight Factor**

<table>
<thead>
<tr>
<th>Scoring Criteria</th>
<th>Weight Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Impact of Increased accessibility</td>
<td>100 75 50 40</td>
</tr>
<tr>
<td>2. Facility, Program or Activity Offering</td>
<td>100 80 60</td>
</tr>
<tr>
<td>3. Compliance and Transition Plan Correlation</td>
<td>60 45 30 20 10</td>
</tr>
<tr>
<td>4. Number of People Visits Per Year</td>
<td>45 30 20</td>
</tr>
<tr>
<td>5. Disabled, Elderly and Underserved Populations</td>
<td>40 25</td>
</tr>
<tr>
<td>6. Most Recent Construction/Alteration Activity</td>
<td>30 15 5</td>
</tr>
</tbody>
</table>
### Figure 10: Sample ADA Park Facilities Project Scoring Summary

<table>
<thead>
<tr>
<th>Scoring Criteria</th>
<th>Weight Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Elderly, Disabled and Underserved Populations</strong></td>
<td></td>
</tr>
<tr>
<td>Parks &amp; Recreation programs and facilities that serve these populations constitute a higher need for barrier free design.</td>
<td></td>
</tr>
<tr>
<td><strong>High (≥30%)</strong></td>
<td>30% or less of the population that frequents the facility, program or activity is elderly or disabled.</td>
</tr>
<tr>
<td><strong>Low (&lt;30%)</strong></td>
<td>The facility, program or activity has a high number of people visits per year within Parks &amp; Recreation’s range of programs and activities.</td>
</tr>
<tr>
<td><strong>Number of People Visits Per Year</strong></td>
<td></td>
</tr>
<tr>
<td>Frequency of use for a particular facility, program or activity would be an important factor to consider in determining priority projects for accessibility improvements</td>
<td></td>
</tr>
<tr>
<td><strong>High</strong></td>
<td>The facility, program or activity has an average number of people visits per year.</td>
</tr>
<tr>
<td><strong>Med</strong></td>
<td>The facility, program or activity has a low number of people visits per year.</td>
</tr>
<tr>
<td><strong>Low</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Facility, Program or Activity Offerings</strong></td>
<td></td>
</tr>
<tr>
<td>Title II requires that public entities must provide programmatic access to all programs and activities, when viewed in their entirety.</td>
<td></td>
</tr>
<tr>
<td>Unique building or program (1 location) Or there are no other alternate accessible programs in the County.</td>
<td>Criteria defines the special purpose of a unique building or program where no other accessible alternatives are available.</td>
</tr>
<tr>
<td>Program offers unique equipment or services specifically for the use of individuals with disabilities.</td>
<td>Criteria differentiates locations of special purpose equipment for specific types of disabilities which may not be related to a unique facility or unique program.</td>
</tr>
<tr>
<td>Accessible programs exist at alternate locations within the County, however the distance is greater than 2 miles from the proposed project.</td>
<td>Criteria designates those activities, facilities, or programs that occur in more than one location. While the proposed project location might not be accessible, there are alternate accessible locations but the distance between locations would require one to walk, drive, cycle, etc. beyond a 2-mile radius to reach the alternate location.</td>
</tr>
<tr>
<td>Most Recent Construction / Alteration Activity</td>
<td>Criteria relates to the opportunities to improve accessibility in existing park facilities</td>
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<tr>
<td>Impact of Increased Accessibility</td>
<td>Accessible route to the entrance</td>
</tr>
<tr>
<td>-----------------------------------</td>
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</tr>
<tr>
<td></td>
<td>Accessible path of travel from entrance to services, programs, activities</td>
</tr>
<tr>
<td></td>
<td>Accessible Restrooms and Drinking Fountains</td>
</tr>
<tr>
<td></td>
<td>Accessible communication Devices (i.e.- telephones, assistive devices, and effective communication devices)</td>
</tr>
<tr>
<td></td>
<td>Accessible common use areas (kitchens, conference rooms, meeting rooms)</td>
</tr>
<tr>
<td></td>
<td>Accessory Elements</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Impact of Increased Accessibility</th>
<th>Accessible route to the entrance</th>
<th>The greatest impact to improve accessibility occurs when projects create accessible means for individuals with disabilities to enter park facilities.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Accessible path of travel from entrance to services, programs, activities</td>
<td>The path of travel within a facility to the primary areas of function are the next most important type of project.</td>
</tr>
<tr>
<td></td>
<td>Accessible Restrooms and Drinking Fountains</td>
<td>Restrooms are secondary functions that support the majority of primary functions. They are located within an accessible building and do not represent a barrier to the program, but the ability to use these elements is of higher importance than other elements.</td>
</tr>
<tr>
<td></td>
<td>Accessible communication Devices (i.e.- telephones, assistive devices, and effective communication devices)</td>
<td>These are secondary functions that support the programs or services. They are located within an accessible building and provide access to the same type of information in the facility that individuals without disabilities have. Examples are TTY, assistive listening devices, audible and visual signage, etc.</td>
</tr>
<tr>
<td></td>
<td>Accessible common use areas (kitchens, conference rooms, meeting rooms)</td>
<td>These are secondary functions that support restrooms or other functions. They are located in an accessible park facility and do not represent a barrier to the program, but the ability to use this element is of higher importance than smaller elements. They may be elements located in non-public areas that are frequented by employees with disabilities or are spaces where an occasional visitor may attend a function.</td>
</tr>
<tr>
<td></td>
<td>Accessory Elements</td>
<td>Elements such as alarms, coat hooks, and storage are in spaces that are accessible. As such they do not deny access to a program, facility or activity and are a lower priority.</td>
</tr>
<tr>
<td>Impact of Increased Accessibility</td>
<td>Criteria relates to the impact of a proposed project to increase accessibility. Title II regulations in effect implement Path of Travel requirements previously not required and prioritize the scope of alterations to increase accessibility.</td>
<td>Accessible route to the entrance</td>
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</tr>
<tr>
<td>Compliance and Transition Plan Correlation (cont.)</td>
<td>Criteria defines the nature of the reason for the improvement.</td>
<td>Adds scope and corresponding funding to a planned CIP project to addresses an element recommended for improvement as the result of Self-Evaluation Survey or provides funding for additional phases of previously funded ADA work.</td>
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<tr>
<td>Addresses specific public access element recommended for improvement by Self-Evaluation Survey</td>
<td>This category is for projects that were unplanned in the CIP and for which a dedicated project is created to address items in the Self-Evaluation Survey.</td>
<td>Addresses an element recommended for improvement in the Self-Evaluation and incorporates additional requirements listed in 2010 Standards.</td>
</tr>
<tr>
<td>Compliance and Transition Plan Correlation (cont.)</td>
<td>Criteria defines the nature of the reason for the improvement.</td>
<td>Addresses an element recommended for improvement as a result of the Self-Evaluation Survey.</td>
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<th><strong>Category</strong></th>
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<tbody>
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<td></td>
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<td></td>
<td><strong>Adds scope and corresponding funding to a planned CIP project to addresses an element recommended for improvement as the result of Self-Evaluation Survey or provides funding for additional phases of previously funded ADA work.</strong></td>
</tr>
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<td><strong>This category is for projects for the CIP that are proposed capital improvements to facilities on the Program Access Lists. By providing additional funding to an in-progress project, the project will be able to increase scope to accommodate addressing non-compliance. This category also provides higher prioritization to complete previously authorized projects that were funded for feasibility or partially funded under ADA County-wide funds.</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Addresses specific public access element recommended for improvement by Self-Evaluation Survey.</strong></td>
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<td><strong>This category is for projects that contain elements recommended by the survey of facilities. These facilities have requirements under the 2010 ADA Standards for Accessible Design.</strong></td>
</tr>
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<td><strong>This category is for those areas in park facilities that should be made accessible through the Transition Plan. These spaces are subject to Title I accommodation procedures if there is a request for accommodation outside of the scope of a planned project.</strong></td>
</tr>
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<td><strong>This category is for those areas in park facilities that should be made accessible through the Transition Plan.</strong></td>
</tr>
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</table>
5.5 Accessibility Compliance Team

To meet the challenge of transitioning all park properties to meet 2010 standards and items identified in this Transition Plan, the Parks and Recreation Department should establish an internal Hillsborough County Parks and Recreation Accessibility Compliance Team facilitated quarterly by the Department’s designated compliance official.

This inter-divisional team should bring together staff from the Parks and Recreation Department, Athletics, Therapeutics, Parks Maintenance and Facilities Division, and the Planning and Development Division to promote coordination and communication of potential and planned accessibility projects.

The team should also review programming needs and implementation processes to improve accessibility for both Parks and Recreation programs and facilities. In some cases, this team may decide it is more reasonable to move a program to an accessible location rather than attempt remediation of barriers to accessibility.

Staff for the compliance team should include, but not be limited to:

1. **Administration**
   1. Parks and Recreation Director (Rick Valdez)
   2. Business Manager (Horace Lynch)
   3. Administration Manager/Recreation Manager (Julian Garcia)
   4. Planning/Development Manager (Kyla Booher)
   5. Maintenance Manager (Greg Brown)
   6. Operations/Athletics (Billy Graham)

2. **Business Administrative**
   1. Administrative Services Coordinator (James Crouch)
   2. Event Coordinator (April Young)
   3. Program Coordinator (Steven Feliciano)

3. **Recreation Administration**
   1. Senior Recreation Specialist (Camp SPARKS)
   2. Recreation South (Debbie Robinson)
   3. Recreation North (Adrienne Rouse)

4. **Other**
   1. County ADA Officer (Carmen LoBue)
   2. County Attorney
5.6 Approval of Recommended Policies and Procedures

An internal review of the recommended policies should be conducted and formal approval should be obtained. The policies should be reviewed annually by Parks and Recreation and the ADA Office.

5.7 ADA Compliant Webpage

The Parks and Recreation Department’s webpage should be designed so that it is accessible to individuals with vision, hearing and physical disabilities. Parks and Recreation’s webpage should be evaluated to ensure accessibility to persons with visual and hearing impairments. Hillsborough County should ensure that its customers have access to the same services, regardless of their disabilities. Features of an ADA compliant website include easily resizable text with a high contrast mode option to make text easier to read for visitors with sight impairments. Photos should have text descriptions, and the videos on the County’s website and social marketing strategies should include audio descriptions and captions. The County should select a qualified web design firm to identify any violations of the ADA website compliance rules and outline a plan for updating the online content and properties. Please see Website Accessibility under Title II of the ADA at: https://www.ada.gov/pcatoolkit/chap5toolkit.htm, and https://www.ada.gov/websites2.htm.
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