

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

Winnwald Day Camp is committed to making its programs and activities available on a nondiscriminatory basis as required under Title III of the Americans with Disabilities Act (ADA). Winnwald will not discriminate against any individual on the basis of disability, including a child with diabetes, with regard to the full and equal enjoyment of its programs, services and activities in its summer day camp. Winnwald will make reasonable modifications for children with diabetes, both applicants and those already enrolled, on a case-by-case basis, to permit them to participate in its summer camp, unless Winnwald can demonstrate that making the modifications would fundamentally alter the nature of its summer camp.

Winnwald recognizes that children with insulin-dependent diabetes who participate in summer camp may require assistance with diabetes management. The management regime of every child with diabetes may be different and, therefore, one policy cannot dictate the particular protocol for all individuals.

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

Winnwald will provide this Policy; the procedure to request reasonable modification; a Diabetes Management Plan Form; and a Physical Examination Form, on its website. When informed that a child with diabetes has applied to a particular session of the summer day camp, Winnwald will provide the parent/guardian of such child notice of this Policy. Winnwald will provide a written copy of the Policy, Diabetes Management Plan form, and Physical Examination Form upon request.

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

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

Reasonable modifications shall include, but are not limited to supervising, monitoring and assisting children with diabetes while using blood glucose monitoring tests, insulin pumps, syringes, and other diabetes-related medical equipment, and permitting such children to eat and drink as required to address their diabetic management, while participating in any program, service or activity sponsored by Winnwald.

Notwithstanding the foregoing, in all cases Winnwald will allow the parent/guardian or authorized agent to enter the summer camp premises to monitor the child's blood glucose levels and take appropriate action in response to those levels. Winnwald staff will also allow the child to monitor his or her own blood glucose levels and take appropriate action, when the parent/guardian has authorized Winnwald to do so.

If the child self-identifies, or staff recognizes symptoms of hyperglycemia or hypoglycemia, the Winnwald camp staff will assist the child to check blood sugar and treat the symptoms, and take steps reasonably consistent with the Diabetes Management Plan.

### **Training**

If a child with diabetes applies for any session or program, Winnwald will arrange for a qualified healthcare professional to provide training that enables the camp to provide all care required to comply with applicable law to any staff who may be responsible for or may be working directly with a camper with diabetes. The training will include an overview of diabetes, general information on how to recognize signs and symptoms of hypoglycemia and hyperglycemia, how to get help quickly, and diabetic care practices related to glucose monitoring and regulating glucagon and insulin administration, including by insulin pump.

In addition, at the request of the parent or guardian of a child with diabetes, Winnewald will arrange for training of appropriate staff regarding the particular needs of the child as identified in the child's Diabetes Management Plan. This child-specific training may be given by the parent or guardian, or by a qualified person agreed upon by the parents.

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

Within 30 business days prior to the beginning of any session or program, the parent/guardian of a child with diabetes will provide the Summer Camp with the following:

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

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

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

The parent/guardian will provide specific information and training about the child's diabetes and particular needs related to diabetes care to Winnewald and will permit the child's personal health care providers to share information with staff and other health care personnel to assure the child's safety and compliance with the child's Diabetes Management Plan. The parent/guardian will promptly inform Winnewald of relevant changes in the child's health status.

The parent/guardian will provide, along with instructions about proper maintenance or use of all items, all supplies and equipment necessary for the child's safe participation in camp activities. The parent/guardian will provide and properly maintain all supplies and equipment for the child's diabetes and assist with proper disposal of equipment and supplies. Children may carry their own medical supplies and snacks in a safe fashion that meets local code or safety standards for the care and disposal of medical supplies so that these supplies are in close proximity to the child. When the child cannot hold these supplies, the supplies will be held at the administrative office or health office, or by a staff member.

As applicable, the parent/guardian will furnish meals and snacks not regularly provided by Winnewald that are necessary to meet the child's needs. The parent/guardian will also ensure that the carbohydrate content falls within the proper amounts set forth in the Diabetes Management Plan so that the totals will be predetermined and calculated by the parent/guardian. Carbohydrate values will be calculated and provided on labels on each food item provided by the parent/guardian so that the staff or qualified health care professional may monitor the appropriate use of insulin and insulin pumps or other equipment to administer insulin.

The parent/guardian will check the child's blood sugar levels each morning before the child arrives at camp to ensure they are within the established "target range" in the child's Diabetes Management Plan.

If you have any questions about this Policy, please contact the Director of Winnewald Day Camp.