



Illinois Valley YMCA Guidelines for Evaluating Requests for Modifications/Auxiliary Aids and Services

The Illinois Valley YMCA is a place of public accommodation and is proud to serve a diverse community of individuals, including those with disabilities. The YMCA will work with prospective and current participants with disabilities, and/or their parents/guardians, to ensure that individuals with disabilities are offered full and equal enjoyment to the YMCA's goods, services, facilities, privileges, advantages and accommodations.

Prospective or current participants with disabilities, and/or their parents/guardians may, at any time, request modifications to the YMCA's policies, practices and procedures and/or request auxiliary aids or services. Reasonable modifications and auxiliary aids and services can be wide-ranging. A few examples include: working with children who have diabetes to administer the necessary care they need, allowing a program participant to have a service animal, and providing sign language interpreters.

1. A prospective or current participant with a disability, and/or the participant's parent/guardian, may request modifications or auxiliary aids and services at any time with an oral or written request. Requests should be directed to the applicable Program Director, the Branch ADA Compliance Officer or the Association Office ADA Compliance Officer.
2. Whoever receives the initial request (applicable Program Director, the Branch ADA Compliance Officer or the Association Office ADA Compliance Officer) shall promptly advise the other two individuals involved in the evaluation of requests (i.e., applicable Program Director, the Branch ADA Compliance Officer and/or the Association Office ADA Compliance Officer). It is important that the applicable Program Director, the Branch ADA Compliance Officer and the Association Office ADA Compliance Officer all are aware of the request as soon as reasonably practicable.
3. The Program Director (or the Branch ADA Compliance Officer in the Program Director's absence) is responsible for monitoring the status of the request. Specifically, the Program Director shall work with those involved to ensure that the request is promptly addressed, and that a determination is made and communicated to the prospective or current participant in our programs, and/or the participant's parent/guardian, within ten (10) calendar days after the receipt of the request, absent extenuating circumstances.
4. The Branch ADA Compliance Officer is responsible for promptly reaching out to the prospective or current participant, and/or the participant's parent/guardian, to initiate a discussion of the

request. All communications with the prospective or current participant, and/or the participant's parent/guardian, concerning the modification or auxiliary aids and services should be summarized, to the extent reasonably possible, in the Request for Modifications/Auxiliary Aids and Services Case Management Form.

5. All requests for modifications/auxiliary aids and services require individualized assessments. Specifically, the Branch ADA Compliance Officer, in conjunction with the Association Office ADA Compliance Officer, should determine whether the prospective or current participant has a disability for which he or she needs modifications/auxiliary aids and services. If the prospective or current participant has a disability, the Branch ADA Compliance Officer, in conjunction with the Association Office ADA Compliance Officer, should explore what reasonable modifications/auxiliary aids and services may be available. The Branch ADA Compliance Officer, in conjunction with the Association Office ADA Compliance Officer, may make a narrowly tailored request for medical documentation relating to the disability and any necessary modifications/auxiliary aids and services if needed.
6. If the Branch ADA Compliance Officer, in conjunction with the Association Office ADA Compliance Officer, determines that the YMCA can provide the requested modification or auxiliary aids and services, the Branch ADA Compliance Officer must promptly work with the prospective or current participant, and/or the participant's parent/guardian, to develop and execute an action plan, using the YMCA's Action Plan for Modifications/Auxiliary Aids and Services ("Action Plan").
7. The Branch ADA Compliance Officer is responsible for facilitating the implementation of the Action Plan. The Program Director, in conjunction with the Branch ADA Compliance Officer, is responsible for the actual implementation of the Action Plan with the appropriate YMCA staff. Depending upon the modification or the auxiliary aids and services, staff training may be required. It is the responsibility of the Branch ADA Compliance Officer, in conjunction with the Program Director, to ensure that any such training takes place as promptly as possible.
8. If the Branch ADA Compliance Officer and/or the Association Office ADA Compliance Officer has concerns that the requested modifications or auxiliary aids and services may not be available, the Branch ADA Compliance Officer, in conjunction with the Association Office ADA Compliance Officer, must determine (a) if the provision of the modification or auxiliary aids and services would require a fundamental alteration in the nature of the YMCA's services or programs; (b) if the provision of any auxiliary aids or services, if applicable, would constitute an undue burden (i.e., significant difficulty or expense); and/or (c) if the provision of the modification or auxiliary aids and services would present a direct threat to the health and safety of others.
9. If the Branch ADA Compliance Officer, in conjunction with the Association Office ADA Compliance Officer, answers "no" to all of the applicable inquiries in no. 8 above, then the modification or auxiliary aids and services must be provided and the Branch ADA Compliance

Officer should reach out to the prospective or current participant, and/or the participant's parent/guardian, to develop and execute an Action Plan.

10. If the Branch ADA Compliance Officer, in conjunction with the Association Office ADA Compliance Officer, answers "yes" to one or more of the applicable inquiries in no. 8 above, then the Branch ADA Compliance Officer and the Association Office ADA Compliance Officer must consider, in conjunction with the prospective or current participant, and/or the participant's parent/guardian, whether alternative modifications or alternative auxiliary aids and services may be available.
11. If reasonable alternatives are identified and the prospective or current participant, and/or the participant's parent/guardian, agrees to them, an Action Plan must be developed and executed.
12. If (a) no reasonable alternatives appear available or (b) the prospective or current participant, and/or the participant's parent/guardian, reject the alternative modification or auxiliary aids, the Association Office ADA Compliance Officer must promptly notify the Program Director, the Branch ADA Compliance Officer, and the YMCA's attorneys.
13. If, after consultation between the Branch ADA Compliance Officer, the Program Director, the Association Office ADA Compliance Officer and the YMCA's attorneys, a determination is made to deny the requested modification and/or auxiliary aids and services, the YMCA must advise the affected prospective or current participant, and/or the participant's parent/guardian, in writing, noting each and every reason for the denial of the request. If, after consultation, an agreement is reached with the prospective or current participant, and/or the participant's parent/guardian, an Action Plan must be developed and executed.
14. For all denials made before May 19, 2018, the Association Office ADA Compliance Officer (in conjunction with the YMCA's attorneys) shall provide the Department of Justice with documents related to the decision, the identities of individuals who participated in the decision and all reasons underlying the decision. The provision of the above items to the Department of Justice must occur within seven (7) business days after the final decision to deny modifications or auxiliary aids and services is made.
15. The Branch ADA Compliance Officer will maintain all records regarding approved requests for modifications and/or auxiliary aids and services. The Association Office ADA Compliance Officer will have responsibility for maintaining records of all denied requests for modifications and/or for auxiliary aids and services and of any decisions to exclude a child with a disability from enrollment in a YMCA program.