



American Therapeutic Recreation Association

founded in 1984

June 17, 2005

Office of Special Education and Rehabilitative Services
US Department of Education
400 Maryland Ave SW
Potomac Center Plaza, room 5126
Washington, DC 20202

RE: Changes to 34 CFR parts 300 and 303

On behalf of the members of the American Therapeutic Recreation Association and recreational therapists working in school systems, we are pleased to provide our comments regarding the definition of recreational therapy in IDEA regulations.

Recreational therapists play a critical role in the education, (re) habilitation and health of children who require special education and subsequent related services. Recreational therapists provide essential services to children with disabilities and are active participants in the education of children with special needs. Therapeutic recreation is a related service for children receiving special education and may be required to assist a child with a disability to benefit from special education, including early identification and assessment of disabling conditions. Recreational therapists are highly trained and credentialed professionals with expertise in assessing needs, implementing effective interventions, and evaluating outcomes for children with disabilities to enhance functional performance and facilitate participation in educational, home, and community environments.

As such, the regulations in the IDEA '97 do not reflect current practice of recreational therapy as a related service. We request revision of the regulations reflected below.

300.24 Related Services

300.24(b)(10) Therapeutic Recreation, including recreational therapy

- (i) Services provided by a qualified recreational therapist, one who is nationally certified by the National Council for Therapeutic Recreation Certification (NCTRC); and

- (ii) Services that restore, remediate, or (re)habilitate in order to improve functioning and independence as well as reduce or eliminate the effects of illness or disability; and
- (iii) Services that include initial assessment, education, planning, designed interventions, evaluation and transition services.

303.12 (e) Early Intervention Services

- Identify Recreational Therapy service as an early intervention service for infants and toddlers with disabilities.

Rationale: Recreation Therapy has much to offer families, infants and toddlers with disabilities since play is the learning medium of children. Recreational therapists help aid in identifying infants and toddlers who have developmental delays, enhance the development of infants and toddlers with disabilities to minimize developmental delay, provide services in natural environments, minimize the likelihood of institutionalization, and enhance the capacities of families to meet the needs of their infants and children with disabilities.

Recreational therapy services specifically include but are not limited to:

- Social skills training for the establishment of interpersonal relationships and enhancing community integration;
- Choice making skills that facilitate sound decisions;
- Turn taking skills to control impulsivity and promote effective classroom behavior;
- Following directions to increase educational effectiveness;
- Exposure to new environments including community involvement, and inclusion with peers with non-disabilities to promote effective transition into the community;
- Recreational therapists also educate families on community resources available within their community.

We look forward to working with the Office of Special Education and Rehabilitative Services to develop appropriate criteria for the IDEA 2004 regulations. Thank you for the opportunity to comment on this proposed rule. If you require further information, please contact me directly at (703) 683-9420.

Sincerely,
s/adh

Ann D. Huston, MPA, CTRS
Executive Director

Cc: ATRA Board of Directors
Peter Thomas, ATRA Legislative Counsel