

MEMORANDUM

TO: Members of the York Region Accessibility Advisory Committee (YRAAC)

FROM: Margaret Gaukel, Vice-Chair
YRAAC-*Accessibility for Ontarians with Disabilities Act, 2005* (AODA) Subcommittee

DATE: February 11, 2010

RE: **Draft Accessibility Report on the Accessibility Standards for Customer Service, Ontario Regulation (429/07)**
Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

As Vice Chair of the York Region Accessibility Advisory Committee (YRAAC) - AODA Subcommittee, I submit the following report to the YRAAC on the Subcommittee's review of the draft Accessibility Report on the Accessibility Standards for Customer Service, Ontario Regulation (429/07) under the AODA. Please find attached the YRAAC – AODA Subcommittee Summary of Feedback chart and the draft Accessibility Report for your review and consideration.

Under the AODA, municipal accessibility advisory committees have the role to advise municipal councils on the requirements and implementation of accessibility standards and compliance reports. To assist the YRAAC in meeting its mandate, the YRAAC-AODA Subcommittee is responsible for monitoring and assessing the Region's implementation of the AODA requirements.

As legislated under the AODA (Section 29.4), municipal accessibility advisory committees have the role to advise municipal councils on the requirements and implementation of accessibility standards and compliance reports. As outlined in the York Region Accessibility Advisory Committee (YRAAC) Terms of Reference (Section 1.0), the mandate of the YRAAC is “to assist Council in improving opportunities for persons with disabilities by promoting the implementation of the *Ontarians with Disabilities Act, 2001* (ODA) and the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) in York Region.

To assist the YRAAC in meeting its mandate, the YRAAC-AODA Subcommittee is responsible for monitoring and assessing the Region's compliance with AODA accessibility standards (Section 1.2). The AODA Subcommittee's review is to be reported to the YRAAC who will advise the Community and Health Services Committee and Regional Council on the Region's compliance with accessibility standards and in the preparation of accessibility reports.

As part of the Subcommittee's proceedings at their meeting of February 3, 2010, I was elected as Vice Chair and the YRAAC-AODA Subcommittee reviewed the draft Accessibility Report on the Accessibility Standards for Customer Service Regulation, due to be submitted to the Province by March 31, 2010.

On behalf of the YRAAC-AODA Subcommittee, I confirm that the YRAAC-AODA Subcommittee has advised, monitored and assessed the draft Accessibility Report, as required by legislation.

MG/LD/ph

Attachments (2) Draft Accessibility Report of the Accessibility Standards for Customer Service, Ontario Regulation (429/07), *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), March 31, 2010, The Regional Municipality of York.

Draft Accessibility Report Review – Summary of Feedback Offered by the YRAAC-AODA Subcommittee

Accessibility Report on the Accessibility Standards for Customer Service Regulation (429/07)
Accessibility for Ontarians with Disabilities Act, 2005 (AODA)
March 31, 2010
The Regional Municipality of York

January 2010

DRAFT

Accessibility Standards for Customer Service Regulation Requirement	Corporate Activities	Status Compliant/ Pending	Date
1. a) Does your organization have policies, practices and procedures on providing goods or services to people with disabilities? [s. 3(1)] b) Does your organization use reasonable efforts to ensure that these policies are consistent with the principles of independence, dignity, integration and equality of opportunity? [s.3(2)]	a) York Regional Council endorsed the Accessible Customer Service Policy (ACSP) on November 19, 2009. This policy governs York Region’s practices and procedures on providing goods or services to people with disabilities. It applies to “all York Regional Employees (Union, Non-Union and Students), Volunteers and Agents who are acting or providing services on behalf of York Region, or who help develop policies about how York Region offers services to people.” [ACSP Application P1] Appendix B of the ACSP (Accessible Customer Service at York Region: Practices and Procedures) outlines suggested practices and procedures to carry out this policy. [ACSP Appendix B P21-23] An ongoing comprehensive communication strategy promotes the Accessible Customer Service Policy, practices and procedures to both internal and external audiences, through the corporate Accessible Customer Service Training program, internet and intranet, posters, payslip inserts to all staff, workshops, pamphlets and employee newsletters. b) When developing or revising policies, practices and procedures, the ACSP requires the Region to “use its best effort to make sure that the policies, practices and procedures match the principles of dignity, independence, integration and equal opportunity.” [ACSP Objectives P5]	a) Compliant b) Compliant	January 1, 2010

Accessibility Standards for Customer Service Regulation Requirement	Corporate Activities	Status Compliant/ Pending	Date
	A corporate initiative was included in the 2009 York Region Accessibility Plan (under the <i>Ontarians with Disabilities Act</i>) which required all departments to review their internal policies, practices and procedures to “ensure incorporation of the AODA Accessibility Standards for Customer Service Regulation’s core principles of independence, dignity, integration and equality of opportunity.” A corporate initiative of the draft 2010 York Region Accessibility Plan will require all departments to incorporate the Accessible Customer Service Policy into specific departmental policies and practices.		
2. Do your organization’s policies address the use of assistive devices by people with disabilities to access your organization’s goods and services or any alternative measures that enable them to do so? [s.3(3)]	The ACSP directs that “people with disabilities may use their own personal assistive devices, or those which may be offered by the Region, while getting goods and services given in any premise owned, leased, occupied or operated by the Region.” [ACSP Use of Assistive Devices P5] The Accessible Customer Service Training program addresses the use of assistive devices by people with disabilities when accessing York Region programs or services. All Regional employees, volunteers and agents offering direct service to the public on behalf of the Region receive this training, as required by the legislation. Tier one training for front line staff placed particular focus on the use of assistive devices (see question 10 below).	Compliant	January 1, 2010
3. Do your organization’s policies, practices and procedures require your organization to take a person’s disability into account when communicating with a person? [s.3(4)]	The ACSP requires goods and services offered by the Region to be given in a way which “communicates with a person with a disability in a way that takes the person’s disability into account.” [ACSP Objectives P5] Appendix A of the ACSP (Accessible Customer Service at York Region: Tips for Serving Customers with Disabilities) outlines methods to best serve customers with disabilities (physical, deaf-blindness, vision, intellectual, speech, learning, mental illness, smell, touch, taste and others).	Compliant	January 1, 2010

Accessibility Standards for Customer Service Regulation Requirement	Corporate Activities	Status Compliant/ Pending	Date
	[ACSP Appendix A P15-20] The Accessible Customer Service Training program addresses methods to communicate with a person with a disability that take the person's disability into account. All Regional employees, volunteers and agents offering direct service to the public on behalf of the Region receive this training, as required by the legislation (see question 10 below).		
4. Do members of the public or other third parties have access to premises that your organization owns or operates? [s.4(1)] If no, then skip to question 7 below.	Yes, members of the public or other third parties have access to premises that York Region owns or operates.	n/a	n/a
5. a) Does your organization permit people with disabilities to keep their service animals with them on the parts of your premises that are open to the public or other third parties, except where the animal is excluded by law, and is this included in your policies, practices and procedures? [s. 4(2) & (7)] b) If a service animal is excluded by law from your premises, does your organization ensure that alternate measures are available to enable the person to access your goods or services? [s.4(3)]	a) The ACSP directs that “service animals are allowed to go with any person with a disability while getting goods and services given in any premise owned, leased, occupied or operated by the Region, except where not allowed by law.” [ACSP Service Animals and Support Persons P6] b) The ACSP directs that “where an animal is not allowed by law, or may affect the health and safety of other customers, other ways will be explored in order to provide service to a person with a disability.” [ACSP Service Animals and Support Persons P6] The Accessible Customer Service Training program addresses the use of service animals by people with disabilities. All Regional employees, volunteers and agents offering direct service to the public on behalf of the Region receive this training, as required by the legislation (see question 10 below).	Compliant	January 1, 2010

Accessibility Standards for Customer Service Regulation Requirement	Corporate Activities	Status Compliant/ Pending	Date
6. Does your organization permit people with disabilities to enter the parts of your premises that are open to the public or other third parties with their support person, and provide notice of any fee charged for the support person, and is this included in your policies, practices and procedures? [s.4(4) (6) and (7)]	The ACSP directs that “support persons are allowed to go with any person with a disability in any premise owned, leased, occupied or operated by the Region.” It further directs that each Regional department must post notice of fees charged for a support person, if any, on a sign, brochure or website. [ACSP Service Animals and Support Persons P7] The Accessible Customer Service Training program addresses the use of support people by people with disabilities. All Regional employees, volunteers and agents offering direct service to the public on behalf of the Region receive this training, as required by the legislation (see question 10 below).	Compliant	January 1, 2010
7. Does your organization post a notice at a conspicuous place on your premises, on your website, or by another reasonable method, of any temporary disruption in facilities or services that people with disabilities usually use to access your organization’s goods or services, including the reason, duration and any alternatives available? [s.5(1) (2) & (3)]	The ACSP directs that “if there is a temporary disruption in facilities or services used by people with disabilities, notice of the disruption must be provided.” Each Regional department responsible for the affected facility or service shall notify the public in the most effective way, using corporate communication practices in place. Notice may be given by posting the information on the premises, on the Region’s website, voicemail messaging or by any other reasonable method. [ACSP Notice of Temporary Disruption Process P8] Appendix C of the ACSP (Notice of Temporary Disruption) provides notice templates for departments to use to notify the public about disruptions in service to a washroom, elevator and program/service. These templates can be altered to suit other types of temporary disruptions, as needed, and are available for all staff on the intranet. [ACSP Appendix C P24-26]	Compliant	January 1, 2010

Accessibility Standards for Customer Service Regulation Requirement	Corporate Activities	Status Compliant/ Pending	Date
8. Has your organization established and documented a process to receive and respond to feedback on how its goods or services are provided to people with disabilities, including actions that your organization will take when a complaint is received? [s.7(1) (3) & (4)]	The ACSP directs that “each Regional department will collect and respond to feedback about the way they provide goods and services to people with disabilities,” using the current customer service feedback processes in place. Response to feedback will “follow the York Region Customer Service Strategy standard, at a minimum,” which includes required feedback response times. [ACSP Feedback Process P10] Each Regional department has well-established customer service feedback processes in place to receive and respond to public feedback. These processes will continue under the direction of the ACSP, including responding to feedback on how goods and services are provided to people with disabilities (see question 9 below).	Compliant	January 1, 2010
9. Does your organization make information about its feedback process readily available to the public, including how feedback may be provided (e.g. in person, by telephone, in writing, by email, on diskette or otherwise?) [s. 7(1) & (2)]	The ACSP directs that customers who want to offer feedback about York Region’s service to people with disabilities contact the department or program area that served them. The contact list for individual Regional departments and program areas is readily available on the corporate website through front page access via both the “Accessible Customer Service at York Region” link and “Contact Us” link. The contact list is also available on the internal intranet site for staff to access in the event that they must refer a customer to another department or program area for assistance. The contact page outlines how individuals can offer feedback, including in person, by telephone, in writing or email. [www.york.ca]	Compliant	January 1, 2010

Accessibility Standards for Customer Service Regulation Requirement	Corporate Activities	Status Compliant/ Pending	Date
10. Does your organization ensure that the following people receive training about providing your goods or services to people with disabilities: • Every person who deals with the public or other third parties on behalf of your organization, and • Every person who participates in developing your organization's policies, practices and procedures on providing goods or services? [s. 6(1)]	The ACSP directs that the Region “must make sure that the following persons receive training about giving goods or services to persons with disabilities: • those who deal with members of the public or other third parties on behalf of the Region, whether the person does so as an employee, agent, volunteer or otherwise, and • those who participate in developing policies, practices and procedures governing the provision of goods or services to members of the public or other third parties. [ACSP Customer Service Training P9] York Region developed its own Accessible Customer Service Training program in two formats. ‘Tier One’ training was offered for selected front-line staff in Spring 2009. This full-day workshop included case study scenarios and guest speakers representing various types of disabilities. Over 150 employees completed ‘Tier One’ training, which helped inform the development of ‘Tier Two’ training, the Region’s current and ongoing training module. ‘Tier Two’ training includes a York Region-specific 30 minute video, made in partnership with Rogers TV (York Region) and available in accessible formats (closed-captioned, non-closed captioned and descriptive audio). This video has been made available to other jurisdictions, upon request. In addition to DVD format, it is readily accessible on both the internet and intranet for the training of contractors, co-op students, volunteers and others as required. The legislation requires training for those who deal with the public. York Region chose to enhance its already high standards of customer care by requiring all Regional employees to receive Accessible Customer Service Training, regardless of their level of contact with the public. Mass training of Regional employees occurred September to December 2009. New hires will receive this training through the required Customer Service Core Competency Workshop offered through Corporate Services Department (Corporate Learning). Training records for employees are maintained through the Corporate Learning Registration system.	Compliant	January 1, 2010

Accessibility Standards for Customer Service Regulation Requirement	Corporate Activities	Status Compliant/ Pending	Date
	As of January 2010, 3298 Regional employees have received Accessible Customer Service Training. Volunteers, including Co-op Students, receive Accessible Customer Service Training through the respective department. Compliance tools were developed to assist departments train contractors/agents who directly serve the public on behalf of York Region, including: • External access to training from the corporate website. • Checklist template with instructions to determine if an agent requires training. • AODA contract wording to be included in contracts, as required. • AODA Training Certificate to be provided to all agents who require training. • Frequently Asked Questions for staff. • Accessible Customer Service Training Package for agents (which includes training instruction and a summary of the ACSP). • Letter template for agents who require training. [Intranet Business Resources > Accessibility and www.york.ca]		
11. Does this training include your organization's current policies, practices and procedures required under the Customer Service Standard and all the topics listed in section 6(2) of the standard? [s. 6(2) & (4)]	The training includes York Region's current policies, practices and procedures and "a review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Accessibility Standards for Customer Service, Ontario Regulation 429/07 and teach about the following matters: • How to interact and talk to persons with various types of disabilities. • How to interact with persons with disabilities who use an assistive device or need the help of a service animal or a support person. • How to use equipment or devices available on York Region premises or otherwise supplied by the provider that are available in the person's workplace, that relate to the job they do and that may help with providing goods or services to a person with a disability, and • What to do if a person with a particular type of disability is having a hard time getting	Compliant	January 1, 2010

Accessibility Standards for Customer Service Regulation Requirement	Corporate Activities	Status Compliant/ Pending	Date
	the provider's goods or services. [ACSP Customer Service Training P9] Accessible Customer Service Training materials include a training video (see question 10 above) and a pamphlet. All Regional employees, volunteers and agents offering direct service to the public on behalf of the Region receive this training, as required by the legislation. The video highlights key policies, practices and procedures and the pamphlet summarizes the organization's policies, practices and procedures in a written format. Text of the pamphlet is in an accessible font size and limited graphics for people with vision disabilities. It was distributed to all employees as a payslip insert and is included in the Accessible Customer Service Training Package for agents.		
12. Does your organization have a written training policy that includes a summary of the contents of the training (per question 11 above) and details of when the training is to be provided, and does your organization keep records of the dates that training was provided and how many people were trained? [s. 6(5) & (6)]	The ACSP includes a summary of the contents of the training (as above) and states that "training must be given to each person as soon as possible after he or she is assigned the applicable duties." The ACSP also states that records must be kept "regarding the training provided, including the dates on which the training was provided, the number of individuals to whom it was provided, and the names of those who were trained." [ACSP Customer Service training P9] Training records for York Region employees (including the dates on which the training was provided, the number of individuals to whom it was provided, and the names of those who were trained) are maintained through the Corporate Learning Registration system. As required by contract, contractors/agents must submit an AODA Training Certificate, indicating that training has been conducted; records of training dates, numbers and names are maintained by the contractor. Training records for volunteers, including Co-op Students, are maintained by the respective departments.	Compliant	January 1, 2010

Accessibility Standards for Customer Service Regulation Requirement	Corporate Activities	Status Compliant/ Pending	Date
13. Does your organization post a notice at a conspicuous place on your premise, on your website, or by other reasonable method, that the documents required by the Customer Service Standard are available upon request, and do you provide those documents in a format that takes a person's disability into account? [s. 8(1) & (2) and 9(1)]	As required by the legislation, the ACSP directs that York Region will make the following documents available upon request in a format that both parties agree with and that takes into account the person's disability: • York Region's policies, practices and procedures about the offering of goods and services to people with disabilities. • York Region's policies, practices and procedures about the use of service animals and support persons. • The steps York Region will take to notify people about a temporary disruption of facilities or services usually used by people with disabilities. • York Region's policy on providing training on accessible customer service. • York Region's process for receiving and responding to feedback on the offering of goods and services to people with disabilities. [ACSP Notice of Availability of Documents P11] Notice about how to request these documents is readily available on the corporate website through front page access via the "Accessible Customer Service at York Region" link. Requests for alternate formats of these specific documents are handled by the Community and Health Services Department. [www.york.ca]	Compliant	January 1, 2010

**York Region Accessibility Advisory Committee-Accessibility for Ontarians with Disabilities Act (AODA) Subcommittee –
February 3, 2010**

**Summary of Feedback: Accessibility Report on the Accessibility Standards for Customer Service Regulation (429/07)
Accessibility for Ontarians with Disabilities Act, 2005 (AODA)**

Questions, Comments or Suggestions YRAAC-AODA Subcommittee	Staff Recommendation/Response	Given the response, does the Accessibility Report need to be revised?
General Feedback		
At what stages of development and implementation are other municipalities?	York Region is an active member of the Ontario Network of Accessibility Professionals (ONAP) and the York Region Municipal Staff Reference Group (MSRG). Ongoing contact with accessibility coordinators across Ontario reveals that municipalities are at various stages of meeting of the requirements of the legislation, from early stages of implementation to filing of final reports with the Accessibility Directorate of Ontario.	No
Will York Region need to file an accessibility report every year for this regulation?	The Province has not released details about future reporting requirements. The only information available relates to March 31, 2010. The remaining accessibility standards will also have reporting requirements, although details have not yet been released. The Accessibility Standards for Customer Service Regulation has one compliance date for the requirements of the entire regulation. Future regulations may contain phased in compliance dates for requirements within each regulation.	No
Comment: The Accessibility Report is succinct, professional and easy to understand.	No response necessary.	No

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York Region Accessibility Advisory Committee-AODA Subcommittee – February 3, 2010
Summary of Feedback: Accessibility Report on the Accessibility Standards for Customer Service Regulation (429/07)
Accessibility for Ontarians with Disabilities Act, 2005

Questions, Comments or Suggestions YRAAC-AODA Subcommittee	Staff Recommendation/Response	Given the response, does the Accessibility Report need to be revised?
Accessibility Report Question #1 - Policies, Practices and Procedures		
What internal audits will be developed to monitor operationalizing the requirements of the legislation?	Some monitoring mechanisms have been built into the implementation process through record keeping requirements. For example, by contract, a Certificate of AODA Training must be submitted by agents/contractors to the Region indicating that they have conducted the Accessible Customer Service training, as required. These certificates are retained with the contract file and are available upon request, to audit compliance. To monitor the effectiveness of the Accessible Customer Service Training, a Level 3 Evaluation is scheduled to occur between April and July 2010. This type of assessment tests behaviours and knowledge. Although at this point, internal audit processes are not a requirement of the legislation it is recognized that this type of audit is important. A comprehensive audit process will be developed by staff in Community and Health Services Department in the near future to monitor ongoing compliance with the regulation and will be reported to the YRAAC.	No
Accessibility Report Question #2 - Use of Assistive Devices by Customers with Disabilities		
No comments to report.	No response necessary.	No

**York Region Accessibility Advisory Committee-Accessibility for Ontarians with Disabilities Act (AODA) Subcommittee –
February 3, 2010**

**Summary of Feedback: Accessibility Report on the Accessibility Standards for Customer Service Regulation (429/07)
Accessibility for Ontarians with Disabilities Act, 2005 (AODA)**

YRAAC-AODA Subcommittee Questions, Comments or Suggestions	Staff Recommendation/Response	Given the response, does the Accessibility Report need to be revised?
Accessibility Report Question #3 - Communication with Customers with Disabilities		
No comments to report.	No response necessary.	No
Accessibility Report Question #4 – Public Access to Premises		
No comments to report.	No response necessary.	No
Accessibility Report Question #5 - Use of Service Animals by People with Disabilities		
No comments to report.	No response necessary.	No
Accessibility Report Question #6 - Use of Support People by People with Disabilities		
Does Mobility Plus Service charge a fee for a support person when accompanying a Mobility Plus Service user?	Where a support person/attendant is required in order for the passenger to become eligible to use the Mobility Plus service, the support person/attendant will not be required to pay a fare when using the transit services.	No
Accessibility Report Question #7 - Temporary Disruptions to Services or Facilities		
No comments to report.	No response necessary.	No
Accessibility Report Question #8, 9 - Process to Receive and Respond to Feedback		
No comments to report.	No response necessary.	No
Accessibility Report Question #10, 11, 12 - Accessible Customer Service Training		
Have volunteers received training?	As directed in the Accessible Customer Service Policy (ACSP), each Regional department is responsible to train volunteers in their program areas. Training of volunteers is ongoing and has been offered in various ways, including at orientation sessions and regular meetings.	No

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York Region Accessibility Advisory Committee-AODA Subcommittee – February 3, 2010
Summary of Feedback: Accessibility Report on the Accessibility Standards for Customer Service Regulation (429/07)
Accessibility for Ontarians with Disabilities Act, 2005

YRAAC-AODA Subcommittee Questions, Comments or Suggestions	Staff Recommendation/Response	Given the response, does the Accessibility Report need to be revised?
Accessibility Report Question #10, 11, 12 - Accessible Customer Service Training		
How many agents/contractors who serve the public on our behalf have received training?	The legislation does not require that a master record of agents/contractors be maintained. Agent records, including the number trained, are retained at a departmental level and are available upon request. As directed in the ACSP, each Regional department is responsible to ensure agents/contractors receive training, as applicable, and to retain a copy of the AODA Training Certificate on file.	No
Have all Regional staff received training?	As of January 2010, 3298 Regional employees have received Accessible Customer Service Training. All categories of staff are included in this count (Casual, PFT, PPT, TFT, TPT and Students). It is recognized that the employee count is a changing number, taking into account new hires, leaves and vacancies.	No
Have Members of Regional Council received training?	Members of Regional Council received accessible customer service training from their local home municipality. Members of Regional Council who are Members of the York Region Accessibility Advisory Committee (YRAAC) received York Region Accessible Customer Service Training at the YRAAC meeting in September 2009.	No
Comment: The Accessible Customer Service Training video has been made available to local municipalities and organizations and has been well received.	No response necessary.	No

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York Region Accessibility Advisory Committee-AODA Subcommittee – February 3, 2010
Summary of Feedback: Accessibility Report on the Accessibility Standards for Customer Service Regulation (429/07)
Accessibility for Ontarians with Disabilities Act, 2005

YRAAC-AODA Subcommittee Questions, Comments or Suggestions	Staff Recommendation/Response	Given the response, does the Accessibility Report need to be revised?
Accessibility Report Question #13 - Availability of Documents in Alternate Formats		
Are documents already available in alternate formats upon request?	The documents referred to in the Accessibility Report are those relating to the Accessibility Standards for Customer Service and the York Region Accessible Customer Service Policy. York Region does have corporate Multiple Format Guidelines, which were approved by Regional Council in 2007 and state that “Printed and electronic materials may be made available in Multiple Formats as needed and/or upon request only”. Staff are directed to consult with the individual requesting an alternate format to determine the most suitable and practical format. Access to certain formats such as Braille must be outsourced. The proposed Information and Communications standard includes a requirement for organizations to have written policies regarding how the organization will deal with requests for information and communication in alternate formats. Once this is passed into regulation, York Region will develop a policy to address this requirement.	No
Comment: Most people with disabilities accept reasonable alternate formats, but need to know that alternate formats are available.	No response necessary.	No

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