SUBJECT: ATS Master Plan - Eligibility and Registration Policy Revision for Accessible Transportation Services - (PW03128b) (City Wide)

RECOMMENDATION:

(a) That the General Manager of Public Works be authorized and directed to implement a revised eligibility policy and registration assessment procedure, by November 1, 2008, for the Accessible Transportation Services (ATS) program of the City that has a focus on determining the most appropriate form of public transportation for each person with a disability which will meet their mobility needs, such that:

(i) an individual’s eligibility for specialized transit service (i.e. D.A.R.T.S. and Taxi Scrip) be determined by a functional mobility assessment of their ability to use conventional HSR services based on physical (strength based), cognitive and sensory abilities;

(ii) three eligibility categories be adopted, including full eligibility, conditional eligibility, and temporary eligibility;

(iii) the functional mobility assessment be conducted by an independent third party;

(iv) the registration procedure include an initial screening step to enable individuals who clearly meet the eligibility criteria to bypass the full functional mobility assessment;

(v) the registration procedure include a separate appeal mechanism, available to any existing registrant or new applicant who is not satisfied with the outcome of the assessment; and

(vi) the registration procedure include a client orientation step that includes changes to the eligibility policy and services.
(b) That the General Manager of Public Works be authorized and directed to implement the revised eligibility policy and registration assessment procedure, such that:

(i) all existing ATS registrants be reassessed under the new policy and registration procedures to determine their eligibility for ATS services.

(ii) ATS services be further coordinated with conventional HSR services to enhance the utilization of accessible low floor (ALF) by persons with disabilities, through the acquisition of mobility management software and implementation of trip by trip eligibility.

(iii) a travel training program be developed and provided to assist persons with disabilities in the use of conventional HSR services.

(iv) a “soft landing” program be provided to assist existing registrants who have been assessed as not requiring ATS services under the new policy, including:

1. continued eligibility to use D.A.R.T.S. for a period of one (1) month, with consideration of exceptions on the recommendation of ATS staff in consultation with the trainer;
2. continued availability of Taxi scrip for a period of six (6) months;
3. a special HSR bus pass for a period of twelve (12) months to encourage their use of conventional HSR services; and
4. travel training to assist them in the use of conventional HSR services.

(v) all aspects of the new program of service delivery be referred to the Advisory Committee for Persons with Disabilities for advice and consultation in future.

(c) That the General Manager of Public Works be authorized and directed to employ a phased approach to implementation of the revised eligibility policy and registration assessment procedure, such that:

(i) in Phase 1,

1. a project steering committee, inclusive of the City’s Advisory Committee for Persons with Disabilities and Seniors Advisory Committee, be established;
2. a qualified consultant be retained to complete necessary work for the City to issue an RFP and award a contract for third party functional mobility assessment services; and
3. assessment of the functional mobility of existing registrants be undertaken.

(ii) in Phase 2,

1. a qualified consultant be retained to conduct an assessment of existing operational capacity, to develop a go forward passenger service strategy, and to complete necessary work for the City to integrate that strategy with the anticipated RFP for passenger services to take effect in 2008;
(2) a follow-up report to Council detailing operational, financial and social implications of dealing with the assessment findings and service strategy be completed; and

(3) upon Council direction, RFPs be issued and concluded, and a vendor or vendors be contracted to provide passenger services and travel training services

(iii) In Phase 3,

(1) new registrants under the new policy be added onto accessible transportation services in a manner to be approved by Council in consideration of the follow-up report as per recommendation (c)

(ii) (2) to this report;

(2) travel training program and “soft landing” activities be undertaken as per recommendations (b) (iii) and (b) (iv) to this report; and

(3) staff report to Committee and Council on at least an annual basis regarding the new registrant take-up and impacts on the program operating budget.

(d) That the General Manager of Public Works be authorized and directed to retain such qualified consulting services, under City of Hamilton Purchasing policies, as may be required to carry out activities related to third party functional mobility assessment development, RFP issuance and contract award; and assessment of existing operational capacity, service strategy development, and service RFP issuance and award; utilizing previously approved funds from Capital Account 5300483400.

Scott Stewart, C.E.T.
General Manager
Public Works

**EXECUTIVE SUMMARY:**

During 2002 Budget deliberations, staff presented several options for dealing with program cost escalation in the Accessible Transportation Services program, including an option for not renewing eligibility of “grandfathered” ambulatory registrants for the DARTS program. Council rejected that option, and subsequently directed that staff report back with a revised eligibility policy based on the use of functional assessment of registrants to determine eligibility for Accessible Transportation Services.

Hamilton’s current policy includes persons unable to climb or descend steps used in conventional transit facilities (e.g. bus steps), or walk a distance of 175 metres, or comprehend surroundings, instructions and directions in the use of public transit with safety. People who use a mobility aid, receive dialysis treatment or have Alzheimer are eligible for specialized transit; all other persons with disabilities qualify only for the taxi
scrip program (subsidized at 40%).

In accordance with the above noted Council direction, staff undertook work on a revised eligibility policy. Reports PW03128 and PW03128a made specific recommendations to Council on revised policy and funding regarding eligibility for the Accessible Transportation Services (ATS) program of the City. These reports were deferred by Council in 2003 and 2004 in consideration of necessary input from the City’s Advisory Committee for Persons with Disabilities, resolution of operating and capital budget considerations, and completion of the settlement of complaints against the City under the Ontario Human Rights code. Further delay in reporting has resulted from required work on the review of ATS and DARTS operations directed by Council, and the uncertainty over the impacts of any Council direction which may influence the scope of work and accountabilities within the plan for implementing eligibility and registration changes.

Input from the ACPD was obtained and incorporated within the recommended approach to moving the changes to eligibility and registration forward. In the initial study on eligibility and registration which resulted in the recommendations to Council, a steering committee composed of staff and members of the ACPD was struck to guide the work of the consultant; this structure successfully engaged the ACPD and allowed the work to progress at the necessary pace to achieve project goals. Staff will employ a similar approach for this next phase of the project, and will further involve the City’s Seniors Advisory Committee to ensure that all views are represented on the project steering committee by Council appointees.

The policy recommendations contained within this report bring Hamilton into alignment with current legislative requirements, and meet or exceed the policy standards employed by other Ontario municipalities who provide similar services.

Program operating and capital budget considerations were addressed within the 2004 and 2005 budget cycles. Report PW03128 recommended allocation of capital and operating funds intended to address activities associated with development of the functional mobility assessment tool, reassessment of existing passengers, service coordination, travel training and soft landing implementation; and anticipated ongoing expenditures related to assessment of new registrants, travel training, Taxi scrip program co-payment changes, and annual registration fee elimination.

The approval of these capital and operating funds is summarized in TABLE 1: SUMMARY OF APPROVED FUNDING, below.

<table>
<thead>
<tr>
<th>Report Approving Funds</th>
<th>Capital $</th>
<th>Operating $</th>
<th>Exists in:</th>
<th>Intended Use of Funds</th>
</tr>
</thead>
</table>
| 2004 capital budget    | $900K     |             | 5300483400 | • development of functional mobility assessment tool - relates to recommendation (a) (i).  
  • reassessment of existing passengers - relates to recommendation (b) (i)  
  • service coordination - relates to recommendation (b) (ii)  
  • initial travel training and soft landing implementation - relates to recommendation (b) (iii) & (iv) |

TABLE 1: SUMMARY OF APPROVED FUNDING
In order to move the proposed changes to the policy and procedure forward, there are a number of preparatory steps that must be taken. These steps are detailed in Table 2: PROJECT IMPLEMENTATION OVERVIEW, below. These steps are intended to represent the high level activities that will take place prior to the addition of new passengers and services, and include two reports where further Council consideration and direction will be required specific to program budget and operational direction.

**TABLE 2: PROJECT IMPLEMENTATION OVERVIEW**

<table>
<thead>
<tr>
<th>Phase</th>
<th>Description</th>
<th>2007</th>
<th>2008</th>
<th>2009</th>
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<tr>
<td></td>
<td></td>
<td>Q2</td>
<td>Q3</td>
<td>Q4</td>
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<tr>
<td>1</td>
<td>Report to Council - policy and phase-in strategy</td>
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<tr>
<td>1</td>
<td>Project ramp-up: Steering Committee, project charter, communications plan</td>
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<tr>
<td>1</td>
<td>Retain Consultant: design functional assessment and RFP for 3rd party assessment (TPA) services</td>
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<tr>
<td>1</td>
<td>In-house review of existing registrants for referral to functional assessment</td>
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<tr>
<td>1</td>
<td>Issue and award RFP for TPA services</td>
<td></td>
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<td></td>
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<tr>
<td>1</td>
<td>TPA of functional ability of existing registrants</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>2</td>
<td>Retain Consultant: assessment of operational capacity and development of passenger service strategy</td>
<td></td>
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<tr>
<td></td>
<td>Report to Council - passenger service strategy</td>
<td></td>
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<tr>
<td>2</td>
<td>Consultant development of passenger service and travel training RFPs</td>
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<tr>
<td>2</td>
<td>Report to Council - sample TPA findings and direction on work completion</td>
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<td></td>
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<tr>
<td>2</td>
<td>Issue and award RFP for passenger services</td>
<td></td>
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<tr>
<td>2</td>
<td>Issue and award RFP for travel training services</td>
<td></td>
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<tr>
<td>2</td>
<td>Contractor ramp-up: supplementary passenger services</td>
<td></td>
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<tr>
<td>3</td>
<td>Travel training and soft landing activities undertaken</td>
<td></td>
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<tr>
<td>3</td>
<td>New registrants under the revised policy added onto accessible transportation services</td>
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<tr>
<td></td>
<td>Report to Council - program take-up by new registrants and effects on program</td>
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</tbody>
</table>
Based on the above noted work, Recommendation (a) to this report, wherein the revised eligibility policy is implemented and extended to new applicants, must necessarily be undertaken after several key preliminary steps are completed, and cannot reasonably be put into place before the fourth quarter of 2008.

The three reports to Council which are indicated in the project implementation overview are considered necessary by staff.

- The first report will allow Council to consider, based on preliminary third party assessment of existing registrants, whether remaining registrants should be subject to assessment or should be “grandfathered” within the program. This consideration has short term project capital implications, wherein unnecessary expenditures may be avoided; and long term operating impacts, as grandfathering of existing registrants who might not otherwise qualify for services under the new policy will create service pressures with budget implications in the range of some $500,000.

- The second report will allow Council to consider the service strategy under which additional anticipated passenger trips are to be delivered. This strategy will necessarily be tied to the work on the potential 2008 service provider RFP (contract currently with DARTS), which staff will be carrying out concurrently.

- The third report will allow Council to review the actual program take-up by new registrants and consider the impacts on the program, particularly as they relate to the operating budget, as research indicates that a potentially broad range of some 600 to 2,000 prospective registrants who may enter the system under the revised eligibility and registration policy.

The July 12, 2006 approval by Council of Report PW05075 Accessible Transit Services (ATS) Review and subsequent Committee direction have committed staff to additional work deliverables which may have an impact on the Phase 1 activities identified within Table 2: Project Implementation Overview to this report. The work flowing from the ATS Review recommendations is the subject of ongoing implementation, and will occur during several phases during 2007 and 2008, including the potential issue of an RFP for service delivery (currently performed by DARTS) that will create a more competitive, responsive service environment.

As individual members of Council and stakeholders within the community have expressed their desire to see a shorter timeframe to implementation of this change in policy and the corresponding availability of service, Council might direct that staff dispense with the functional mobility assessment of existing program registrants, and further authorize and direct staff to develop and deploy, at its discretion, a necessary service strategy for delivery of trips without further report to Council. This direction might advance the target date for introduction to new registrants to August 1, 2008. As indicated in Table 1 of this report, staff initially estimated the financial implications to be in the order of $500,000 in new unfunded operating costs, as outlined in the “Analysis/Rationale” and “Alternatives for Consideration” sections to this Report. In the time that has passed since the original report the specialized transit industry has acquired new knowledge and experience leading staff to update the forecast of new unfunded operating costs to be in the order of $750,000 to $1,000,000. The savings associated with not assessing existing program registrants would allow the retention of
consulting services or temporary project staff as necessary from existing project capital budget.

Specialized Transit program eligibility is a complex and evolving issue. The new AODA legislation contemplates much broader eligibility than what is currently considered the norm in the industry. New Provincial standards are anticipated to be released by the Province in 2007. Council’s adoption of the recommended policy contained in this report will align Hamilton with the intent of the draft Provincial standards and initiate inclusion for citizens not currently able to use conventional transit but not eligible for the Specialized transit program. Adoption of the recommended policy, however, without the corresponding actions contemplated in the policy, including delisting of “grandfathered” clients currently eligible will actually lead to program cost increases in the order of $750,000 to $1,000,000 based on currently available industry information, in contrast to the initial objective of program cost containment.

BACKGROUND:

The information/recommendations contained within this report have City wide implications.

In discussions within the 2002 Budget deliberations, staff presented program service reduction options for Council consideration. For the Accessible Transportation Services program of Transit, this included an option for not renewing eligibility of “grandfathered” ambulatory registrants for the D.A.R.T.S. program, with identified net savings.

Council rejected this option, and subsequently directed that staff report back with a revised eligibility policy based on the use of functional assessment of registrants to determine eligibility for Accessible Transportation Services. Councillors expressed a desire to be presented with alternatives to address ongoing concerns that included the escalating cost of Accessible Transit Services (ATS) and rising concerns over the equity and legality of the current policy.

In accordance with the above noted Council direction, staff undertook work on a revised eligibility policy. In a Project Update to Council dated October 7, 2002, staff informed Council that a consulting study would be undertaken, and outlined the objectives and expected outcomes of the study. The study was completed in July 2003 and recommendations were presented in Council Report PW03128 in September 2003. Council deferred consideration of this report to seek response from the Advisory Committee for Persons with Disabilities in supporting, amending, or rejecting staff recommendations. The ACPD provided the requested response, and supported the staff recommendations with two recommended amendments, as reported to Council within Report PW03128a and as subsequently amended and directed by Council. These recommendations of the ACPD, as adopted by Council, are fully reflected in the recommendations to this Report.

Final Council consideration and direction of the recommended eligibility and registration approach has been further delayed between 2004 and the present by:

- deferral of the issue within the 2004 budget deliberations so as to fully understand the legal and financial implications of the contemplated changes,
such implications being fully dealt with during the 2005 budget deliberations and through the completion of the OHRC settlement, as noted below;

- the completion of settlement with the Ontario Human Rights Commission regarding complaints against the City with regard to the specialized transportation program, such settlement being attained in late 2004 and implemented throughout 2005, confirming the City’s position in regard to questions of access to service;

- the review of ATS and DARTS operations directed by Council in early 2005, such review continues which may impact the ability of staff to deliver work within the timelines of the proposed plan for implementing eligibility and registration changes;

- the delay experienced through 2005/06 in filling key staff positions within Transit which would allow any work to commence on this project, subject to direction of Council; and

- the transition to a new Council as a result of the 2006 municipal election.

ANALYSIS/RATIONALE:

As previously detailed in Report PW03128, the recommendations have both immediate and long term financial implications as noted below in Table 3.

<table>
<thead>
<tr>
<th>TABLE 3: CAPITAL AND OPERATING COST SUMMARY</th>
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<tbody>
<tr>
<td></td>
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<tr>
<td>One Time Capital Costs</td>
</tr>
<tr>
<td>Net new ongoing Operating costs - assessment and anticipated service growth</td>
</tr>
<tr>
<td>Further new Operating cost if decision not to reassess existing passengers</td>
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<tr>
<td>Potential annual Operating cost savings - reassess existing passengers</td>
</tr>
<tr>
<td>Potential annual Operating cost savings - Travel Training</td>
</tr>
<tr>
<td>Potential annual Operating cost savings - Trip by Trip Eligibility</td>
</tr>
<tr>
<td>Currently approved by Council through funding from Gas Tax Reserve</td>
</tr>
<tr>
<td>Currently approved by Council through funding from Gas Tax Reserve</td>
</tr>
<tr>
<td>If existing passengers reassessed and transitioned, expect $500,000 in offsetting savings for net $0 impact (see below)</td>
</tr>
<tr>
<td>Dependent upon Council decision to transition passengers who do not qualify under new eligibility criteria</td>
</tr>
<tr>
<td>Dependent upon Travel Training take-up by prospective users</td>
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<tr>
<td>Dependent upon future Council consideration</td>
</tr>
</tbody>
</table>

It is important to note that the $500,000 (now forecasted to be in the order of $750,000 to $1,000,000) in new operating cost identified in Table 3 will be offset by cost savings if the existing ATS clients are reassessed under the recommended new eligibility policy; failure to implement the reassessment of all existing clients has ongoing annual operating cost implications, such costs being over and above funding already approved and allocated to this initiative.
As noted in Table 3, once the proposed strategy is fully implemented, there are opportunities to realize savings which might be used to offset growth costs or fund service improvements. These potential savings might amount to about $450,000 annually, and are composed of:

- $50,000 through reduced D.A.R.T.S. trip demand via travel training for HSR,
- $400,000 through reduced D.A.R.T.S. trip demand via trip-by-trip eligibility.

No part of the offsetting savings from travel training or trip-by-trip eligibility will be realized before the 2009 budget and beyond. The implementation of trip-by-trip eligibility is expected to be a controversial issue, and will likely require the further consideration of Council based on the success of implementation of other recommendations within this report between now and 2009.

Most importantly, the proposed plan is expected to be a significant future cost avoidance tool by ensuring all users are provided service appropriate to their functional capability.

The phased approach to implementation recommended within this report is necessary to ensure that stakeholder and passenger expectations can be met within the identified resources, and that services to existing passengers are not compromised through significant new load on the system where an appropriate response mechanism is not in place.

**ALTERNATIVES FOR CONSIDERATION:**

There are three distinct alternatives that Council might consider.

Council might consider making no changes to the current eligibility policy, and form of registration. This option is not viewed by staff as viable, as it fails to:

- address issues that may arise under the Ontario Human Rights Code, with potential for complaints under the code;
- address community concerns with the inequity of the existing policy; and
- take proactive action with regard to issues that will likely form a key component of legislation under the Accessibility for Ontarians with Disabilities Act (AODA), expected within a short period of time.

Council might consider directing staff to dispense with the functional mobility assessment of existing program registrants, and to expedite the assessment of existing operational capacity and opportunities for service rationalization and/or expansion. Such direction would move the implementation of services forward by several months from the anticipated date of November 2008. There would be two significant impacts on the program as conceived.

- Firstly, the reduction in existing program registrants which had been anticipated as a result of application of the functional mobility assessment would not be realized. As existing service is being employed by passengers to its useful capacity, there would be an immediate and quickly growing need for new contracted services to be delivered as new registrants under the revised eligibility policy are brought into the system. The capital and operating costs previously
reported to Council had been predicated on a nominal net change to registration in the program; the “grandfathering” of existing registrants and expansion of service to accommodate new registrants would have a financial impact that may be estimated in the range of $500,000 to $1,000,000 in unbudgeted costs.

- Secondly, the time frame for implementation would need to be compressed beyond the capabilities of existing staff to effectively carry out the necessary work to implement the program changes. There would be a necessity to either retain unforeseen consulting services or to hire temporary project staff. As currently approved capital funds would not be expended on assessment services, these might be utilized to fund such consulting services or temporary project staff.

Council might consider directing staff to take no action pending introduction of the impending Accessibility for Ontarians with Disabilities Act (AODA) standards. These standards might differ from those that are being considered under this report. There is an element of risk that enactment of local standards in advance of provincially legislated standards could have the effect of provision of access to a wider group than might subsequently qualify for services, with the issue of claw-back of service from registrants who no longer qualify again arising before Council. On the other hand, such legislation may not be in force within the foreseeable future, and the ongoing delay of changes to the existing policy would have similar impacts to those where no change is enacted. The existing approach being recommended maintains compliance with the current governing legislated requirements.

Given the negative impacts of each of the alternatives, the recommended approach is considered by staff to be the most effective in dealing with the issues to be addressed.

**FINANCIAL/STAFFING/LEGAL IMPLICATIONS:**

The recommendations within this report have financial implications that are within the currently allocated budget for the project. These implications have been fully detailed in Council Report PW03128 and are updated and summarized within the Executive Summary and Analysis/Rationale sections to this report.

There are no permanent staffing implications of the implementation of the eligibility and registration policy. Costs of incremental temporary staffing and consulting services to carry out the project have been accounted for within the preliminary work plan, and it is anticipated that the majority of ongoing assessment and training activities will be carried out through contracted third party services.

Legal implications of the recommendations to this report are associated with the City’s compliance with provincial legislation regarding persons with disabilities. The recommended eligibility policy should ensure the availability of appropriate specialized transit service for persons who are unable to use the conventional transit service provided by the City due to any form of disability, and meet or exceed requirements under the Ontario Human Rights Code, and the Ontarians with Disabilities Act (ODA). It is also anticipated that the recommended policy will meet or exceed standards that are currently under development as part of the introduction of the Accessibility for Ontarians with Disabilities Act (AODA).
POLICIES AFFECTING PROPOSAL:

Accessibility for Ontarians with Disabilities Act, 2005

On June 13, 2005, the Accessibility for Ontarians with Disabilities Act, 2005 (AODA 2005) received Royal Assent and is now law. The purpose of the AODA 2005 is to benefit all Ontarians by developing, implementing and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities by 2025.

Standards will be developed in cooperation with people with disabilities, the Government of Ontario, representatives of industries and of various sectors of the economy with respect to goods, services, facilities, accommodations, employment, buildings, structures and premises.

Ontarians with Disabilities Act, 2001

Public sector organizations including Government ministries, municipalities, hospitals, public transportation organizations, school boards, colleges and universities are required to continue to prepare and make public annual accessibility plans, as the legal obligations under the Ontarians with Disabilities Act, 2001 remain in force until such time that the Act is repealed.

Ontario Human Rights Commission and the Code

The Ontario Human Rights Commission (OHRC) is an independent arm of the Ministry of Citizenship. While the OHRC and the Ministry's ODA Disability Directorate staff communicate on a regular basis, the Ontario Human Rights Code over-rides the ODA.

The OHRC Commission investigates human rights complaints, including complaints from transit riders or would-be-riders, whether or not the system has a Full Accessibility Plan in place. However, the OHRC staff has clearly indicated to transit providers that a strong, comprehensive Full Accessibility Plan will be looked at and taken into account when a complaint is being reviewed. An example might be that a person complains that he or she is being discriminated against because the local transit system does not have TDD or TTY capability; however the local Transit System's Plan indicates that TDD/TTY is budgeted and planned for in the following year.

What is a Disability?

The AODA and ODA use the Ontario Human Rights Code definition of “disability”. This definition includes physical, sensory, cognitive, developmental and mental disabilities, and brain injury. Section 2 of the ODA defines "disability" as:

a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
b) a condition of mental impairment or a developmental disability,
c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
d) a mental disorder, or
e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997; ("handicap").

**DARTS Contract**
The City's contract for service delivery with DARTS, and the DARTS subcontract with Veterans Transportation, expires in June 2008. As per the prior and continuing direction of Council, stakeholders are working on the appropriate governance and operating models for provision of these services in time for Council’s consideration prior to the expiration date of the current contract(s).

**RELEVANT CONSULTATION:**
During the course of the study and development of recommendations, consultation on prospective policy reform was undertaken with:
- members of the City’s Advisory Committee for Persons with Disabilities, and Senior’s Advisory Committee;
- City Legal Services;
- Corporate Finance;
- the City’s Access and Equity Coordinator; and
- approximately thirty representatives of organizations providing services to, or advocacy on behalf of, persons with disabilities.

**CITY STRATEGIC COMMITMENT:**
By evaluating the “**Triple Bottom Line**”, (community, environment, economic implications) we can make choices that create value across all three bottom lines, moving us closer to our vision for a sustainable community, and Provincial interests.

Community Well-Being is enhanced.  ☑ Yes  ☐ No
Access to the community by persons with disabilities is enhanced in a manner that complies with legislated requirements.

Environmental Well-Being is enhanced.  ☐ Yes  ☑ No
Economic Well-Being is enhanced.  ☐ Yes  ☑ No

Does the option you are recommending create value across all three bottom lines?  ☑ Yes  ☐ No

Do the options you are recommending make Hamilton a City of choice for high performance public servants?  ☑ Yes  ☐ No