SUBJECT: Status Update on the Implementation of O.Reg 429/07 Accessibility Standards for Customer Service, pursuant to the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) (FCS09101) (City Wide)

RECOMMENDATION:

a) That report FCS09101 regarding the Implementation of O. Reg 429/07 Accessibility Standards for Customer Service, be received for information;

b) That staff be requested to report back on financial, staffing and legal implications by the end of the year and bring forward, for Council’s consideration, final recommendations for the implementation of the customer service standard and related policies; and

c) That AMO’s position on the Initial Proposed Built Environment Standard be endorsed and that a copy of this report be forwarded to AMO and the Minister of Community and Social Services.

____________________________
Roberto Rossini
General Manager, Finance & Corporate Services

EXECUTIVE SUMMARY:

The Province of Ontario approved Ontario Regulation 429/07 Accessibility Standards for Customer Service, pursuant to the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) to require accessibility in service delivery for municipalities, government agencies and boards and various classes of private sector organizations. Municipalities are to implement the standard by January 1, 2010. On June 8, 2009, the Committee of the Whole received a report from the Advisory Committee for Persons with Disabilities outlining their recommendations for implementation of the standard and the tools, processes, and attitudes that would need to be in place for the City of Hamilton to
meet the needs of people with disabilities. Their recommendations were referred to staff for a report on June 10, 2009. Staff have reviewed the draft and provide the following outline of the measures that are in place and the current status of preparations for implementation of the standard. The report also notes the areas where we believe we will be unable to complete implementation by January 1st, 2010 and highlights the need for further financial and other resources.

**BACKGROUND:**

On May 10, 2005, the Provincial Government passed the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). The AODA is a provincial law that recognizes the history of discrimination against persons with disabilities in Ontario and will require the “…development, implementation and enforcement of standards” for accessibility to goods, services, facilities, employment, accommodation, buildings, structures and premises for persons with disabilities”. The AODA standards apply to private and public sector organizations all across Ontario. Persons with disabilities and representatives of the Ontario government, specific industry sectors and various groups to whom the standards will apply have been involved in the development of the accessibility standards.

There are 5 different accessibility standards pursuant to the AODA, which are at various stages of development and approval. The accessibility standards being developed by the Ontario government are as follows:

- **Customer Service Standards** – approved by regulation; to be implemented by municipalities by January 1, 2010
- **Transportation Standard** - draft standards developed, public consultation on the draft is complete, revised draft from the Standards Development Committee submitted to the Ministry for approval
- **Information & Communications Standard** – draft standards developed, public consultation on the draft is complete, revised draft from the Standards Development Committee submitted to the Ministry for approval
- **Employment Standard** – draft standards developed, public consultation on the draft is complete; Standards Development Committee has not yet recommended a final standard to the Minister
- **Built Environment Standard** – draft standards developed; public consultation phase completed on October 16, 2009

Each of the standards is designed to detail the measures, policies, practices and other steps needed to identify, remove and prevent barriers for people with disabilities,
addressing the needs of people with a wide range of disabilities, including physical, sensory, hearing, mental health, developmental and learning disabilities. The Accessibility for Customer Service Standard, O.Reg. 429/07 came into effect on January 1, 2008, with a 2-year window for implementation by municipalities. As the Customer Service Standard was not prescriptive, in form, it was necessary to obtain feedback regarding the needs of people in our community to address the barriers they face in independently accessing City services and the devices, policies and procedures that the City would need to put in place to provide more independent and dignified access to the full range of City services.

In order to develop a set of guidelines for implementation, staff of the Access & Equity Office consulted with the Advisory Committee for Persons with Disabilities, members of community agencies that provide support to people with disabilities, as well as, consultation generally with community members with disabilities. The Advisory Committee formed a Customer Service Sub-committee which discussed the needs of people with disabilities in our community in terms of accessing City services through several channels of service delivery (phone, counter, web, print, e-mail, public meetings, films and services which require a home visit). The Sub-committee also met with staff of several departments to address accessibility requirements for those services that are delivered or partially delivered outside the typical service delivery channels, or whose services are somewhat different in nature, perhaps requiring alternate measures to be put in place for accessibility. These services included Waste Services, By-law Enforcement, Fire, Emergency Medical Services, Ontario Works, Recreation and Culture. In addition, the Sub-committee spent time reviewing and discussing the customer service attitudes which need to be in place to effectively serve the needs of people with disabilities. The input with respect to these services are included in the proposed measures for implementation of the Customer Service Standard which was recommended to the Committee of the Whole on June 8, 2009, by the Advisory Committee and which is attached as Appendix A to report FCS09101.

During the course of the development of the standard by the Advisory Committee for Persons with Disabilities and its Sub-committee, ongoing feedback and drafts were discussed regularly with the Staff Access & Equity Committee to obtain and assess concerns about operational implications and input with respect to any barriers staff might see with implementation of the recommendations from the Advisory Committee.

In addition, staff of the Access & Equity Office organized an Accessibility Resource Fair in late September, 2009, where vendors of accessible equipment, services and technology could demonstrate the products they have available to meet the needs of people with disabilities. In this way, staff were provided an opportunity to address some of the possible solutions to meeting the recommended requirements for implementation and to provide feedback which has been utilized to select common solutions to addressing the needs across the organization.
ANALYSIS/RATIONALE:

Work to complete the implementation is still underway, and will be beyond the end of the year. Attached as Appendix B to report FCS09101 is an outline of the timing of activities still underway in order to meet the implementation deadline of January 1, 2010.

The activities which are anticipated to be complete by January 1, 2010, are as follows:

- Policy development

- Development of resource toolkit (i.e. how to access American Sign Language Interpreters, how to obtain Braille conversion services, Large Print and Clear Print Guidelines, etc.)

- Obtaining assistive devices for public service counters

- Procedures development

- Development and testing of a feedback and reporting mechanism

- Assessment of facilities that serve the public for level of accessibility

There are some areas where full implementation will not be possible by January 1, 2010. Some work will continue in 2010 and possibly beyond. Other suggested improvements will need to be addressed in the implementation with the other standards still to be approved; particularly where there is overlap in the standards. The following are the areas where we believe implementation will not be completed by January 1, 2010, together with the alternatives being considered to ensure that there is at least a partial level of accessibility in place.

Training Plan

The training plan, as noted in discussions with Committee of the Whole in March, 2008, will not start to be rolled out until early 2010. Communication is planned for all staff in late November and December to provide a Tool Kit of Resource Information including documents such as "How To Serve people with disabilities", Resource contacts (ASL, Braille, etc), Accessibility Equipment and how to use it, Accessible Meeting Checklist, Feedback/complaint forms and processes, standards for Clear Print & Large Print, and Web authors interim guide for accessibility. Drop-in Question & Answer sessions are also anticipated to assist staff with a preliminary understanding of their requirements and procedures, in advance of the training sessions which are anticipated to start in the first quarter of 2010.
Recreation Programs & Facilities

The Recreation Division currently provide services geared to meeting the recreation and leisure needs of people with disabilities in our community. The current programs include individual support for summer camp where children with disabilities need support in order to participate, Splashabilities – a learn to swim program for children with disabilities, and recreational swim programs for people with disabilities. In addition, Council, in the 2009 Capital Budget, provided funding for a Needs Assessment of the recreation and leisure needs of our community members with disabilities, as recommended to Committee of the Whole by the Advisory Committee for Persons with Disabilities on May 12, 2008. The RFP for this work is anticipated to be called in the late Fall of 2009. The results of this Needs Assessment will inform the changes that are required to address the accessibility of recreation and leisure programming.

Currently the Recreation Division is conducting Accessibility Audits within 15 recreation facilities, including arenas, recreation centres and Seniors Centres.

To date, the Recreation Division have completed upgrades to many facilities. Renovations have included, door activators added to front doors and washrooms, chair lifts for indoor pool, and accessible counters within the recreation centre and vending areas in arenas.

During the discussions of the Customer Service Sub-committee with the staff of the Recreation Division, it was noted that not all recreation facilities are accessible, with varying levels of accessibility noted. The Sub-committee recognized both that it would not be possible to make all of the recreation facilities fully accessible by January 1, 2010, and that the AODA Built Environment Standards for Accessibility would address the accessibility requirements and timing of full accessibility of recreation and leisure facilities in its regulations. Their recommendation was that a simple listing be made available to members of the public about the level of accessibility and the accessibility features in place at each of the City’s recreation facilities, so that people with disabilities could better understand how they could meet their recreation and leisure needs. An audit of recreation facilities for accessibility is being undertaken to ensure that this information is available in various formats to members of the public by January 1, 2010. In addition, new facilities and renovations to existing facilities will be made accessible moving forward.

Accessible Facilities for Public Service Delivery

For the City facilities where members of the public come to access City services, in person, the Advisory Committee recommended that the following features be in place to address physical accessibility: a ramp into the building, an elevator, if required, to access the floor where the service counter is located, automated door openers, an accessible counter and an accessible washroom.
Corporate Facilities Management: Accessible for Public Service Delivery

Corporate Facilities for 2008/2009 has undertaken a complete accessibility audit of several City facilities based on the City's current Barrier Free Guidelines. The 16 audits completed, to date, have focused on buildings with a public customer service component, they include all of the Town Halls, the Fire administration building and the two operations centres with a service desk open to the public. In addition, there was a sampling of 4 libraries audited to provide a base for the review of the remaining library facilities. Additional building audits are planned which will be helpful in planning improvements to address the current accessibility challenges in the remaining facilities within the Corporate portfolio.

As a result of this audit, it has been determined that to have the most immediate concerns (building access, entrances and washrooms) addressed, in only these 16 facilities within our portfolio, would cost, for 2009 alone, upwards of $350,000 - the majority of which is capital in nature. For the years following, we are looking at the cost to retrofit those same buildings for a full upgrade to our Barrier Free Guidelines only, (as the Built Environment Standard has yet to be completed), to be $4.3 million, an average expenditure of $270,000 per building. As well, given that the Built Environment Standard is pending, it would have a direct impact on the recommended building retrofits for Customer Service.

Additional audits are planned for 2010. These audits will be helpful in planning improvements to address the current accessibility challenges. Currently, there are a few locations, where City services are offered, where the recommended level of physical accessibility is not in place. Work is underway, in those facilities, to address the Customer Service accessibility deficiencies, with prudent consideration of the incoming Built Environment Standard.

For services which are offered in more than one location, not all of which may be accessible, the accessible locations will be published to ensure that community members with disabilities will have access to accessible service in at least one location, and possibly in more than one location, where services are currently available in more than one location. Where accessible service is provided in one or more locations, the renovations required in the non-accessible facilities will be assessed in conjunction with the capital program for each facility, and following the approval of the Built Environment Standard for Accessibility.

Accessible Museum Programs

Due to the heritage nature of most of the museums, physical accessibility is not always an option. The challenge is, therefore, to create the museum tour programs in an alternate way. The concept being developed to offer an alternative is to have a web-based tour option, utilizing either or a combination of photographs and videos, which can be made available to people using mobility devices who are unable to access the full tour
of some of the facilities. The Culture Division has applied for a grant to help provide this technological solution, but are not anticipating that the solution will be in place in a first phase until January 2011. They are not anticipating providing interim solutions for January 1, 2010. Other accessibility measures providing access for people with different types of disabilities will be implemented, such as availability of American Sign Language interpreters on request or use of FM hearing devices for people with hearing disabilities, as well as, display captions and other materials being available in large print for people with visual disabilities.

**Accessible Website**

The City’s website and the content on the website is not fully accessible, and it is not anticipated that it will be for some time. The website, in its current form, can create barriers for people who need a larger font to enable them to read the information and utilize the on-line applications, and the structure of content creates barriers for screen readers for some individuals. The draft regulation for Accessibility for Information and Communication sets out what needs to be done to ensure accessibility for the website and on-line information and applications. It also recognizes that legacy systems may take a longer timeframe for improvements to achieve full accessibility.

The Customer Service Sub-committee of the Advisory Committee for Persons with Disabilities understood that there is another standard (the Information and Communications Standard) yet to come that would address issues of accessibility on the City’s website, both with respect to applications and information. However, they felt that steps must be taken to address web accessibility for any on-line applications where it is offered as an option for a channel of service delivery. The Sub-committee made recommendations with respect to how to address web accessibility for our on-line applications and for information. They also recommended that where the web applications could not be made accessible in accordance with their recommendations, there must always be one or more other channels of service delivery available to members of the public, that would address their needs for access in an accessible way (i.e. access the service by phone, hard copies of forms available for completion in writing, at a counter, or in person). The Information Services Division are preparing an inventory of on-line applications, in order to assess whether or not all or some of the applications can be modified to ensure a higher level of accessibility. Where that is not possible, the website will note which other channels of service delivery are available and how they can be accessed. It is not anticipated that this work will be complete by January 2010.

In addition, in order to avoid the creation of further inaccessible content, as an interim step, a review is being undertaken of the Web Authors Guidelines, to ensure that they support the creation of accessible content.
Accessibility Features at Public Meetings

The Advisory Committee for Persons with Disabilities included in their recommendations for implementation of the standard, a set of guidelines for making public meetings and consultations accessible. Staff of the Access & Equity section are working with staff of other departments on how these features may be provided, and what current procedures will need to be changed to address the accessibility requirements. Some accessible equipment or services may be made available, on request, where the notification period allows sufficient time for accessing the requested services. In other cases, where there will be similar engagement or consultation meetings to be held in different locations, only some of the meetings might provide fully accessible options. The arrangements will be set out in the toolkit and/or procedures being developed for staff.

Other Areas where implementation is at risk:

Processes are underway to develop the feedback and tracking process and tools to monitor feedback and complaints related to accessibility. Given the limited timeframe to roll this out to staff, there is some risk that it will not be fully rolled out, or perhaps not well understood by staff by January 1, 2010. The feedback process, however, should provide us with information where additional work needs to be done as we receive feedback from members of the public, and the training will address these processes, once it is underway.

There is also a very short timeframe to complete the policies required to be in place for implementation of the standard. Policy development is under way, and community consultation is complete. At present, the draft policies are to be completed and discussed with the Advisory Committee for Persons with Disabilities at their November meeting, and then to be presented to Committee of the Whole for approval in December. In addition, procedures for all processes related to the implementation of the policies and the standard must be in writing. The development of the toolkit and the procedures are being developed.

Any delays in these schedules would put us at risk for not being in compliance by January 1, 2010.

**ALTERNATIVES FOR CONSIDERATION:**

There are limited if any alternatives to implementing the standard. The Ministry of Community and Social Services have informed us that they have established a compliance program, and fines for non-compliance under the regulation are up to $100,000 per day or part of the day, if the City is found to be non-compliant.

For areas where solutions have been recommended by the Advisory Committee for Persons with Disabilities and may not be completely feasible, alternatives have been sought and are being provided, as noted above. The regulation does require that if our
standard of implementation is insufficient to meet the needs of a person with a disability, we must provide an alternative to meet those needs.

Some devices available to assist with accessible service will only be available at some locations on a regular basis, but will be made available only on request at other locations. Examples include texting communication devices as well as text to speech readers that will be available at some counters, but will only be available on request at other counters. Other options such as the provision of documents in Braille or the availability of American Sign Language interpreters will, in many cases, only be provided on request. Ongoing evaluation of need will be addressed through the use of the feedback mechanism, so that additional locations for these devices or translation of certain documents into Braille can be added if a regular need indicates that it is advisable.

**FINANCIAL/STAFFING/LEGAL IMPLICATIONS:**

Financial Implications
The financial implications are not yet fully known, and will be more fully developed over time.

There was an approval for capital funding in 2009 of $250,000, which will be utilized to provide the additional accessibility equipment required and to supplement the accessibility dollars in the Facilities budget for accessibility improvements.

The costing implications of other items requiring additional funding are not yet fully known, such as those for facility improvements, revisions to web services, and possibly new or modified programs such as recreation and culture programs. Given the alternatives noted above under “Analysis/Rationale”, staff have tried to minimize the financial implications by phasing in over time a more complete implementation of the standard, ensuring that accessible service is available at least in one location, and phasing in the changes required in the future. Any requirements for funds beyond those currently provided for in capital and operating budgets will be reported on separately by the respective department.

One of the financial impacts of the standard will not be seen until we have some experience with it. There is a lack of information about the volume of requests the City might have for documents to be converted to Braille, for provision of real time captioning or American Sign Language, or for provision of documents in large print, as well as the demands for augmentative equipment to be made available beyond those planned in the roll-out. These costs will need to be borne from the operating budgets, and additional funding will be considered during the 2010 budget and beyond. It will take some time to understand the impacts of these requests.

Finally, there are a number of policies being developed, including the fees to be charged for “support persons” as defined in the regulation. “Support person means, in relation to a person with a disability, another person who accompanies him or her in order to help
with communication, mobility, personal care or medical needs or with access to goods or services”. The Customer Service Sub-committee of the Advisory Committee for Persons with Disabilities has provided their direction for development of the policies, and have noted, generally, that people with disabilities should be able to access services and participate in services with a support person, without paying fees for the support person. This policy direction has been discussed with staff of the operating departments that will be impacted, and it has been noted that the impacts of not requiring payment for support persons will be minimal, with the only quantifiable change being a loss of revenue for Accessible Transportation Services of approximately $15,000. This estimate is based on 2008 numbers of trips by support persons. This policy and its implications will be more fully addressed when the final policies are brought forward for approval.

Generally, there is a concern about the cost implications of implementation of this standard and discussions about the experience of other municipalities. Staff are recommending that a review be completed of the experience of other municipalities to report back to Committee at a later date.

In addition, there are larger concerns over the potential cost impacts of all the AODA regulations in general and in the Built Environment Standard, in particular. City Council has on two occasions passed motions identifying the need for the Province at address the financial implications of the implementation of the AODA standards. On February 9, 2005, Council approved the following motion from the Corporate Administration Committee:

That the provincial government be requested to develop or identify funding sources to assist municipalities with implementing the requirements of the Accessibility for Ontarians with Disabilities Act (Bill 118).

On November 14, 2007, Council approved the following motion of the Public Works Committee:

That the City, through the General Manager of Finance and Corporate Services and with support from the General Manager of Public Works, initiate discussions with the Province, the Association of Municipalities of Ontario and other relevant associations advocating that the costs associated with the implementation of the AODA standards be borne by the Province, or in the alternative, that the Province upload the program.

These motions are consistent with the recent AMO position related to the draft Built Environment Standards. A recommendation to endorse the recommendations of the AMO Report on the Built Environment Standard is included in this report FCS09101. AMO’s recommendations are attached as Appendix C to report FCS09101. Generally, AMO believes that there should be a comprehensive look at both the process for the implementation of the standards, including a desire for more harmonization of the standards, and for the financial impacts of the draft standards to be addressed either
through the provision of financial support, or through changes to the draft standard to reduce the financial impacts.

**Staffing**
The assessment of staffing implications is still to be reviewed related to the implementation of this standard. There will be staff costs related to coverage of some staff during the roll out of the training, which will be minimized as much as possible.

**Legal**
The proposed standard represents progress towards achieving fully accessible service for people with disabilities in Ontario, as required by the Accessibility for Ontarians with Disabilities Act and consistent with the City’s obligations under the Ontario Human Rights Code.

**POLICIES AFFECTING PROPOSAL:**

There are several policies being developed for the implementation of O. Reg. 429/07, which will be brought forward later in the year for approval.

**RELEVANT CONSULTATION:**

All departments have been consulted in the development of this report.

**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

Public services and programs are delivered in an equitable manner, coordinated, efficient, effective and easily accessible to all citizens. The implementation of the AODA Customer Service Standard will improve access to services for people in the community with disabilities, provide an improved feedback process to address concerns and provide direction for future improvements.

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

There is no negative impact on the environment.

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

Economic well-being is enhanced as access to opportunities and services is enhanced for people with disabilities.

*Does the option you are recommending create value across all three bottom lines?*
Do the options you are recommending make Hamilton a City of choice for high performance public servants?  
☐ Yes  ☑ No

The Customer Service Standard of the Accessibility for Ontarians will be consistent with the creation of a respectful, desirable and supportive workplace. The provision of policies, procedures and training for City employees to implement the Customer Service Standard of the Accessibility for Ontarians with Disabilities Act, 2005 will assist employees in better serving the needs of and providing appropriate tools for serving people with disabilities.
# AODA Customer Service Standards Implementation – Final Draft (May 2009)

<table>
<thead>
<tr>
<th>Service Delivery Channel</th>
<th>Accessible Service Delivery Feature</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Principles of Service</strong></td>
<td>1. Need alternative methods of service (in-person, telephone, mail, fax, email, texting)</td>
</tr>
<tr>
<td></td>
<td>2. One method of service must not create an advantage or disadvantage over another method—where there is a program or event with limited space or registration, the ability to access services electronically &amp; register must not create an advantage for people who cannot access service electronically; telephone &amp;/or in-person service must be equivalent in terms of timely access—consideration to be given to weather conditions &amp; inability to get specialized transportation or other barriers when determining process &amp; deadlines—options to address barriers.</td>
</tr>
<tr>
<td></td>
<td>3. Need to be alternatives for on-line forms- word, PDF, html (plain / simple English)- electronic &amp; hardcopy</td>
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<td></td>
<td>4. Information on-line, and in-person should be in plain English- simple language</td>
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<tr>
<td></td>
<td>5. Public Access computers must be accessible</td>
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<td></td>
<td>6. Processes must consider that some people use Accessible Transportation services which may not get them to appointments or meetings on time or may be cancelled in inclement weather—alternative options for service, re-scheduling or extension of deadlines must be available, possibly waive fines, payments, late fees or interest (i.e. ability to fill in on-line (or phone) and arrange for payment later, where required)</td>
</tr>
<tr>
<td></td>
<td>7. Eliminating attitudinal barriers are critical to accessible service</td>
</tr>
<tr>
<td></td>
<td>8. Protection of personal privacy is paramount in dealing with customers with disabilities</td>
</tr>
<tr>
<td><strong>Over the</strong></td>
<td>1. Education / awareness/ sensitivity training to address attitudes</td>
</tr>
<tr>
<td></td>
<td>o Ask ‘how can I help you’?</td>
</tr>
</tbody>
</table>
## AODA Customer Service Standards Implementation – Final Draft (May 2009)

<table>
<thead>
<tr>
<th>Counter</th>
<th>Requirements</th>
</tr>
</thead>
</table>
|         | - Avoid use of jargon and acronyms  
|         | - Patience and respect for independence of people with disabilities  
|         | - Design training to accommodate varying levels of learning and technology.  
|         | - Include support persons to assist with communication  
|         | - Include persons with disability to humanize experience and convey independence of persons with disability. |

2. Allow quiet space / room for privacy for conversations, interviews – available on request

3. Clarifying information / verifying  
   - Forms, letter, documents

4. Magnification tools  
   - Hand held magnifying at every counter- 2.3x magnification

5. Electronic automation of forms and answer buttons

6. Ability to notify ahead of time or communicate needs

7. Right to make an appointment  
   - Procedure for people who can’t wait

8. Assistance in completing forms (– lack of use of arms and legs)  
   - Note: a consent waiver may be necessary  
   - Note: address privacy concerns related to assistance

9. Large print- on request  
   - 16-20 standard font- forms, documents, brochures, computer screens

10. Understanding of FM systems  
    - Training on device
<p>| | | |</p>
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| 11. | ability to swivel computer screen  
  o must consider privacy issues  
  o higher monitor |   |
| 12. | accessible counter – height / depth  
  o Lower counters  
  o Smaller width counter  
  o Remove glass at counters between customer and staff to reduce attitudinal barriers. |   |
| 13. | automated doors  
  o Entrances, exits, washrooms, elevators |   |
| 14. | support persons and service animals  
  o Not to be separated from person with disability  
  o Allow in all designated service counters/ locations  
  o Waive fee or notify ahead of time |   |
| 15. | ability to access American Sign Language (ASL) interpreter  
  o Pen / paper  
  o Resource toolkit of providers, cost, process  
  o Utilize staff resource |   |
| 16. | production of information in Braille upon request  
  o Forms, documents, online |   |
| 17. | material should be in MS Word , PDF, html- plain / simple English  
  o Clear font – Arial 14, Verdana 12 |   |
| 18. | training – prepared for technology for people with limited speech |   |
## AODA Customer Service Standards Implementation – Final Draft (May 2009)

<table>
<thead>
<tr>
<th>TAC clinic – computer speaking on behalf of the customer</th>
</tr>
</thead>
<tbody>
<tr>
<td>UbiDuo- face to face communication/ typing system that provides a means of communication without using speech</td>
</tr>
<tr>
<td>Interpretype</td>
</tr>
</tbody>
</table>

### 19. signage / way-finding
- large print
- appropriate height
- markings on the ground toward counter
- straight waiting lines instead of snaky lines

### By Telephone

1. **attitudinal:** privacy for conversation
   - quiet area / space for conversation
   - education / training
   - patience – respect independence
   - clarifying information / verifying

2. limited automated phone tree options with a live answer option
   - 1st option live answer
   - zero out to live answer
   - slower paced automated telephone response
   - Text messaging

3. messaging in queue
   - estimated length of time in queue
   - clear and at a pace to be understood
# AODA Customer Service Standards Implementation – Final Draft (May 2009)

## On-line or Electronic Services

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<table>
<thead>
<tr>
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<tbody>
<tr>
<td>1.</td>
<td><strong>people with disabilities have readers and can alter font size</strong>  &lt;br&gt; o <strong>clear / large print</strong></td>
</tr>
<tr>
<td>2.</td>
<td><strong>register as requiring large print for mail – on request</strong></td>
</tr>
<tr>
<td>3.</td>
<td><strong>MS word document, PDF, html- plain / simple English</strong>  &lt;br&gt; o <strong>Forms, documents, tables</strong></td>
</tr>
<tr>
<td>4.</td>
<td><strong>standard for a minimum font for printed material</strong>  &lt;br&gt; o <strong>Arial 14, Verdana 12- clear print</strong>  &lt;br&gt; o <strong>Large print- 16-20 size font</strong></td>
</tr>
<tr>
<td>5.</td>
<td><strong>Adobe forms, if printable – allow printed blank forms to be filled in as option to on-line forms – may need assistance to fill in</strong>  &lt;br&gt; o <strong>Hard copy option- MS word (in person service)</strong></td>
</tr>
<tr>
<td>6.</td>
<td><strong>ability to enlarge font – depends on the program</strong>  &lt;br&gt; o <strong>links can be in larger font or boxed links</strong></td>
</tr>
<tr>
<td>7.</td>
<td><strong>make site more intuitive</strong>  &lt;br&gt; o <strong>separate pictures and viewing materials from text</strong></td>
</tr>
</tbody>
</table>

## 4. TTY

- Bell relay resource- speak to customer not to the operator

## 5. Text messaging

- Voice messaging – responses / answers by text

## 6. Allow someone to speak on behalf of customer

- **Note:** need to verify consent for assistance & address privacy concerns
<table>
<thead>
<tr>
<th>E-mail &amp; Printed Material</th>
<th>8. people need to receive a notice for on-line forms when they have not been successfully submitted</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>o increase voice capabilities and text font (21/2 to 3 inches)</td>
</tr>
<tr>
<td></td>
<td>o plain English – simple language</td>
</tr>
<tr>
<td></td>
<td>o simple instructions</td>
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<td></td>
<td>o make navigation back &amp; forth easier</td>
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<td></td>
<td>o put steps in order</td>
</tr>
<tr>
<td></td>
<td>o feedback needs to be readable – font &amp; colour</td>
</tr>
<tr>
<td></td>
<td>o clear notes (large) about mandatory fields</td>
</tr>
<tr>
<td>1. people with disabilities have readers and can alter font size</td>
<td>o clear / large print</td>
</tr>
<tr>
<td>2. register as requiring large print for mail – on request</td>
<td></td>
</tr>
<tr>
<td>3. PDF documents / MSWord format – needs to be options for both for on-line information</td>
<td></td>
</tr>
<tr>
<td></td>
<td>o Forms, documents, tables</td>
</tr>
<tr>
<td>4. perhaps a standard for a minimum font for printed material</td>
<td></td>
</tr>
<tr>
<td></td>
<td>o Arial 14, Verdana 12</td>
</tr>
<tr>
<td>5. large print on request – 16-20 font size</td>
<td></td>
</tr>
<tr>
<td>6. Braille – on request</td>
<td></td>
</tr>
</tbody>
</table>
### City of Hamilton Advisory Committee for Persons with Disabilities

### AODA Customer Service Standards Implementation – Final Draft (May 2009)

| Visiting Someone’s Home | 1. protocol in place for mobility device if person must go in ambulance  
|                        | o support person or device to accompany person  
|                        | 2. home visit vs. over the counter  
|                        | • possibly need an appointment  
|                        |   i. vulnerable  
|                        |   ii. secured entry  
|                        | • identification as a city worker  
|                        |   iii. logo  
|                        |   iv. large print business card  
|                        |   v. photo ID  
|                        | • pocket communicator & receiver – FM system  
|                        |   vi. works independent of hearing aids  
|                        |   vii. receiver & microphone  
|                        |   viii. small & portable  
|                        | 3. advance notice of visit (unless enforcement)  
|                        | 4. assistance with forms  
|                        | **Note:** consider privacy issues  
|                        | 5. consent to share personal information  
|                        | • notify in advance to enable customer to provide person to assist with forms  
|                        | • liability to be addressed in procedures  
|                        | 6. attitudinal  

<p>| | |</p>
<table>
<thead>
<tr>
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<tbody>
<tr>
<td></td>
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</tr>
<tr>
<td>7.</td>
<td>hand held magnifying glass if forms are printed in small font</td>
</tr>
<tr>
<td>8.</td>
<td>have large font version available</td>
</tr>
</tbody>
</table>
| 9. | black on white  
a. coloured border to distinguish different copies of forms, where required |
| 10. | electronic forms if requested |
| 11. | large print on computer screens |
| 12. | simple language  
a. avoid use of jargon & acronyms |
| 13. | text option of communicating available on request |
| 14. | allow use of other channels, i.e. voice, web |
| 15. | be flexible in meeting customers’ needs  
o advance notification or accommodation requests |
| 16. | allowing for friend or support person |
| 17. | provide support person- on request |
## AODA Customer Service Standards Implementation – Final Draft (May 2009)

### Public Meetings, Presentations

#### See draft checklist attached as Appendix A (note sources)

<table>
<thead>
<tr>
<th>1. Public Meetings</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. televised meetings – closed captioning</td>
</tr>
<tr>
<td>ii. infrared hearing systems – private, can’t be picked up by radio waves</td>
</tr>
<tr>
<td>iii. real time captioning for public hearings and meetings</td>
</tr>
<tr>
<td>iv. photos of accessible meeting sites</td>
</tr>
<tr>
<td>v. specialized meeting room- on request</td>
</tr>
<tr>
<td>vi. ASL interpreters</td>
</tr>
<tr>
<td>vii. FM systems</td>
</tr>
<tr>
<td>viii. provide meeting handout</td>
</tr>
<tr>
<td>ix. flexible timeframes</td>
</tr>
<tr>
<td>x. email address / telephone number for feedback</td>
</tr>
<tr>
<td>xi. avoid PowerPoint / videos with flashing effect for photo-sensitive epilepsy</td>
</tr>
<tr>
<td>xii. area in the front for people in wheelchairs</td>
</tr>
</tbody>
</table>

#### 2. Presentations

| I. alternative for visual disabilities |
| II. large print format – have a few copies available |
| III. material available electronically, i.e. CD or memory stick |
| IV. on-line access (for 30 days after presentation) |
| V. screen colour and contrast |
| VI. size of font |
| VII. Braille / large print |
| VIII. hard copy / CD of presentation for recap or review afterward |
| IX. email information ahead of time to allow sufficient time to review |
| X. visual identification or photo signs |
# AODA Customer Service Standards Implementation – Final Draft (May 2009)

## XI. Email Address / Telephone Number for Feedback

3. **Physical Locations for Meetings/films/presentations, etc.**
   - I. advertise in advance if location is accessible or not
   - II. one or more venue must be accessible, where there are multiple venues
   - III. consider transportation options
   - IV. highlight what is absolute in terms of accessibility in facilities
   - V. spaces for people in mobility devices

### Films
1. Script available or closed captioning
2. Auditory script

### Attitudes
The sub-committee has reviewed information about serving people with disabilities on the Ministry website, and has modified it to be considered as the basis for procedures and training.

These Service points are attached as **Appendix B**
(a) modification of information available on the Ministry website
### PROVISIONS REGARDING SPECIFIC SERVICE DELIVERY

<table>
<thead>
<tr>
<th>Waste Management</th>
<th>Services to be modified as follows:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Garbage</strong></td>
</tr>
<tr>
<td></td>
<td>- special provisions will be made for people with medical conditions (upon application – proof may be required) to allow more than the 2 bag limit in 2009 and the 1 bag limit in 2010</td>
</tr>
<tr>
<td></td>
<td>- avoid throwing bins on sidewalk (it is disruptive for wheelchairs)</td>
</tr>
<tr>
<td></td>
<td><strong>Green Container</strong></td>
</tr>
<tr>
<td></td>
<td>- smaller green bins available (upon application) for people with disabilities</td>
</tr>
<tr>
<td></td>
<td><strong>Community Recycling Centre / Transfer Stations</strong></td>
</tr>
<tr>
<td></td>
<td>- customer can advise staff at the gate that assistance is required</td>
</tr>
<tr>
<td></td>
<td>- staff at the gate will radio ahead and staff will be available to assist</td>
</tr>
<tr>
<td></td>
<td><strong>Community Outreach Program</strong></td>
</tr>
<tr>
<td></td>
<td>- forms to be available to be printed &amp; mailed or filled out verbally in person and over the telephone</td>
</tr>
<tr>
<td></td>
<td>- written material for education must be available in different formats, i.e. larger font, electronically (choice between PDF and MS Word formats)</td>
</tr>
<tr>
<td></td>
<td>- videos should also have script or closed captioning available</td>
</tr>
<tr>
<td></td>
<td>- Waste calendar contains much information resulting in a font size 11</td>
</tr>
</tbody>
</table>
## AODA Customer Service Standards Implementation – Final Draft (May 2009)

<table>
<thead>
<tr>
<th>Service Area</th>
<th>Specific Customer Service Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>that is quite small – ability to view on-line and expand to make larger; available to be mailed in a large print format in black on white (colours are not good for people with visual disabilities) - provide garbage calendar in Braille or clear print on request</td>
</tr>
<tr>
<td>Bylaw Enforcement</td>
<td>appointments made for most inspections (except heat by-law enforcement) officers are in uniform, carry photo ID and drive vehicles labeled MLE.</td>
</tr>
<tr>
<td>Emergency Medical Services (Ambulance)</td>
<td>priority is handling the emergency service animals allowed in ambulance • special stretchers available for bariatric patients • mobility device taken only if it can be safely secured • cannot accommodate electric chair - this will be transported back to patient’s home • emergency policy for support persons • use many Ministry of Health forms – extremely small print - carry magnifying devices to assist in enlarging font size for forms • deaf or hard of hearing</td>
</tr>
<tr>
<td>Fire</td>
<td>deal with the emergency first and getting people out – worry about people first • visual smoke detectors to be added to smoke alarm assistance program</td>
</tr>
<tr>
<td>Ontario Works</td>
<td>screening can be done by a home visit if a face-to-face interview isn’t possible • ASL interpreter and FM system to be available • 4 locations throughout the City – all accessible • Quiet space / room for job search purposes – accessible computers required at Employment Centres</td>
</tr>
<tr>
<td>Culture</td>
<td></td>
</tr>
<tr>
<td>----------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>• must conserve the originality of the building; create virtual tours to locations/areas that can’t be modified for accessibility</td>
<td></td>
</tr>
<tr>
<td>• more hands on exhibits, where possible</td>
<td></td>
</tr>
<tr>
<td>• accessible amenities and access to all parts of museum, or visual and audio description of inaccessible areas</td>
<td></td>
</tr>
<tr>
<td>• virtual tours, as an option</td>
<td></td>
</tr>
<tr>
<td>• pictures with audio beside exhibits</td>
<td></td>
</tr>
<tr>
<td>• Braille plaques besides pictures</td>
<td></td>
</tr>
<tr>
<td>• DVDs available in some locations – need to be closed captioned</td>
<td></td>
</tr>
<tr>
<td>• ASL interpreters to be available upon advance request</td>
<td></td>
</tr>
<tr>
<td>• Need for alternative formats for materials – i.e. large print, audio version</td>
<td></td>
</tr>
<tr>
<td>• clear explanation of what is accessible and what is not in each location</td>
<td></td>
</tr>
<tr>
<td>• updated washrooms and ramps where possible</td>
<td></td>
</tr>
<tr>
<td>• signage to be modified on exhibits to provide large print – or large print version available</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Recreation</th>
</tr>
</thead>
<tbody>
<tr>
<td>• promotional material needs to be available in printed and large format if required as well as on-line</td>
</tr>
<tr>
<td>• Recreation Guide in large print and Braille on request</td>
</tr>
<tr>
<td>• utilize checklist for accessible meetings</td>
</tr>
<tr>
<td>• accessible family washrooms / special washrooms for persons with support</td>
</tr>
</tbody>
</table>
City of Hamilton Advisory Committee for Persons with Disabilities

AODA Customer Service Standards Implementation – Final Draft (May 2009)

| persons | ramps in pools & raised or dropped floors in pools, where possible  
|         | Interpreters on request to assist with programming and teachings on how to use equipment  
|         | additions to recreation guide, including  
|         |   - whether a facility is accessible or partially accessible  
|         |   - depth of pools  
|         |   - accessible features that facility has – i.e. ramp vs. lift in pool  
|         |   - whether facility is designated as heat alert facility  
|         | programming requirements to be determined following the Needs Assessment for Persons with Disabilities  
|         | equip buildings with visual smoke detectors |
Advanced planning may help to ensure that the accommodation needs of people with disabilities are anticipated and acted upon ahead of time. Even when you may not know in advance whether any of your participants may need accommodations, you should be prepared to arrange your meeting or event to be accessible so that people with disabilities can participate fully.

Short workshops, information sessions, focus groups, media conferences or events of a few hours in duration may not require the same detailed preparations that lengthy conferences or conventions require, such as determining dietary requirements when planning menus and arranging overnight guest rooms. However, many of the same pre-event planning steps apply to both.

The following guidelines are meant to help you plan your meeting or event. They reflect an optimal level of accessibility. Some facilities may not meet all of the criteria outlined below. If you are in doubt about the level of accessibility at a potential venue, it is recommended that you consult with a local disability group who has expertise in barrier-free access and/or meeting planning.

Two important areas need to be considered when arranging accessible meetings - physical access to the meeting space and access to the meeting contents and proceedings.

Here are some general points to think about when planning an accessible meeting or event.
• Ensure that a member of your staff is responsible for making the event accessible.

• Be prepared to respond to accommodation requests in the same manner that you respond to other requests and questions about the event.

• Ensure that the invitation or notice of meeting includes information about the accessibility of the event.

• Investigate what local resources are available, for example, sign language interpreters, accessible transportation, emergency veterinarians (for service animals) and wheelchair repair services, when preparing for longer events.

• Schedule sign language interpreters and/or real-time captioners as soon as possible after confirming the date of the event.

• Before confirming the date, find out if other disability-related events are taking place in the area during the same timeframe. This may have an impact on your event and availability of service providers.
• If the event’s participants are responsible for their own meal arrangements, find out what local restaurants are accessible.

• Investigate the availability of installed or portable FM Listening Systems in meeting facilities for people who have a hearing loss. (An FM system consists of a transmitter used by the speaker and a receiver used by the listener.)

• Investigate the availability of telephones with auditory adjustments for people who have a hearing loss.

• Check to determine whether there are visual fire alarms. If not, inquire about the facility's evacuation plan or create your own.

• Determine the availability of a TTY. Ensure that your staff has been trained on how to use it. (A TTY is a device that is used by persons who are deaf and hard of hearing to communicate through telephone lines.)

• Ensure that the conference website is available in a format that is accessible to people who use screen readers.

• Ensure there is at least one telephone that can be used by a person who is seated.
Check to see if the customer service areas (i.e., counters, display tables, etc.) are low enough for wheelchair or scooter users to see over.

Make sure that any additional signs specific to the event are created in large print.

Determine a suitable relieving area for guide dogs.

Provide water bowls for guide dogs.

Here are some specific points to consider.

**Choosing the location**

- Plan an on-site visit to the location under consideration in order to determine its level of accessibility before you book your event.
- Determine if the site has been recommended by a credible local disability organization with expertise in barrier-free access.
- Determine the appropriateness of the location through previous successful experiences involving people with disabilities at that venue.
- Inquire about recent renovations or current construction that may have an impact on accessibility.
- Determine whether the staff at the location has been sufficiently trained in disability awareness. If not, arrange for training from a recognized trainer prior to your event.
Exterior Access

Signage
• Ensure that the signs for the street address or building name are clearly visible from the street.
• Check to see that the signs are well lit during evening events.

Parking
• Determine that there are a reasonable number of accessible parking spots available for the estimated number of attendees with disabilities. Arrangements can be made with the owners of the meeting facility to permit additional spaces to be used for designated parking close to the building for the duration of the event.
• Ensure that the designated parking spots for people with disabilities are on a firm, slip-resistant surface and located close to the entrance of the building.
• Determine whether there is a curb cut or level access provided from parking area to the main entrance.
• Ensure snow removal during winter events.
• Investigate whether accessible metered parking or public parking lots with accessible spaces are available close by the meeting facility if a large number of attendees with disabilities are expected.
Sidewalks/Path of Travel

• Determine that there is a barrier-free path of travel from the parking lot or drop off area to the meeting entrance, avoiding stairs, sudden changes in level, slippery or unstable ground, or objects obstructing the path of travel.
• Ensure snow removal from the path of travel during winter events.
• Ramps, if required, should be gradual in slope and have handrails on both sides.
• Sidewalks should be clearly separated from the road and driveway for safety reasons.

Accessible Transit

• Make certain that the location is serviced by accessible or parallel transit services.
• Ensure there is a drop-off area available in front of the building. A covered drop-off area is preferred.

Interior Access

Entrances and Lobbies

• Make certain that an accessible entrance is available with all doorways wide enough for the passage of a person using a wheelchair or scooter. Access through the main entrance is highly desirable.
• In the case when the main entrance is NOT accessible, ensure there is a clearly visible sign at the front of the building indicating the location of the accessible entrance.
• Check that entrances are well lit and not located in isolated areas.
• Ensure that entrances do not lead to locked doors with buzzers or bells that must be pushed to permit access.
• Ensure that the door handles are easy to open without individuals having to twist their wrist. Ideally, doors should have lever handles and be equipped with an automatic door opener.
• Provide signs indicating where the meeting is taking place within the building.
• Ensure that the signs are large enough and clear enough to be read by people with low vision.
• Make sure the signs are mounted at a comfortable height for both people who use wheelchairs and people with low vision.
• Arrange for staff or volunteers to be available at doorways and throughout the facility to direct or assist people with disabilities to the meeting location.
Elevators

• Determine that the elevators are located close to the meeting facilities and are large enough to hold power wheelchair and/or scooter users.
• Ensure there are enough elevators to safely and conveniently transport the number of people using mobility devices attending the session.
• Where lifts must be used, make certain they are safe and easy to operate with enough space to accommodate both wheelchair and scooter users.
• Determine whether Braille buttons and raised numerals have been provided to assist people who are blind or have low vision.
• Verify that the elevator controls are mounted at a comfortable height for a person using a wheelchair or scooter.
• Make sure that the elevator has an auditory signal to alert people who are blind or have low vision.
• Check to see that the elevator has a visual cue system in each elevator lobby to alert people who are deaf or hard of hearing.

Accessible Washrooms

• Make sure the washroom doors have a raised (tactile) male or female sign or Braille lettering.
• Check to see that washroom doors are equipped with an automatic or push button door opener.
• Ensure the location has washrooms that are large enough to accommodate scooter and power wheelchair users and are equipped with at least one accessible stall.
• Ensure the location has at least one accessible unisex washroom on the same floor as the event. A minimum of a five-foot turning radius is needed for wheelchair users to manoeuvre without restriction.
• Make sure that the faucets are reachable by a person using a wheelchair or scooter and can be operated using one hand.
• Check to see that other washroom accessories and dispensers are within easy reach of a person using a wheelchair or scooter.
• Make certain that the accessible washrooms are located in close proximity to the meeting rooms.

Hallways and Corridors
• Check to see that major hallways and all essential doorways throughout the facility are wide enough to permit the passage of people using wheelchair and scooters.
• Ensure that all interior doors are easy to open with one hand without twisting the wrist.
• Determine that low pile carpeting, hardwood flooring or tile has been used as the floor finish to ensure that a wheelchair or scooter user can travel easily throughout the facility.

Meeting and Conference Rooms
• It is preferable for the meeting room to be located on the building entry floor.
• Ensure that the boardroom or meeting room is large enough to provide circulation and seating for an adequate or anticipated number of participants who use wheelchair, scooters, guide dogs or other mobility aids.
• Check to see that accessible seating is available throughout the meeting space.
• Determine that the reception/refreshment areas are in an area large enough to provide circulation for participants who use wheelchair, scooters, guide dogs or other mobility aids.
• Ensure that the stages and speaking areas, including lectern or podium are accessible to wheelchair and scooter users.
• Ensure that there is a well-lit space provided for the sign language interpreter when interpreters will be present.
• Check for noise levels (ventilation systems, noise from adjacent rooms etc.) which may be distracting.
• Check to see that the meeting room has appropriate requirements (drapes, blinds, etc.) to provide reduction of light or glare from windows.
• Ensure that cables, wires and microphones are well secured and do not block traffic.
• Remind guest speakers and exhibitors to be prepared to provide printed handout materials in alternative formats should alternative formats be requested in advance.
Making refreshment and dietary arrangements

- Where beverages are being served, bendable straws and lightweight cups should be made available within easy reach of individuals in wheelchairs or scooters.
- Make available non-sugar (dietary) beverages, juices and water for people with dietary concerns such as diabetes.
- Be aware that self-serve meals or buffets may present obstacles for some people who are visually impaired or people with a physical disability. Well-trained catering service staff can provide assistance to participants who require additional help. If catering staff is not present, ensure that someone is assigned to assist those who need help getting food.
- Check to make sure that an alternative to pastries and cookies, such as fruits or vegetables, are available for people with dietary concerns.
- Provide an opportunity for participants to indicate their dietary needs on any registration form or invitation to an event where meals are being served.

Producing invitations and promotional materials

- Ensure invitations and promotional material about your accessible event are identified with the International Symbol of Accessibility and other accessibility symbols.
- Provide invitations in alternate formats for people or organizations that require or request them (i.e. Braille, on audiotape, via e-mail, in large print, on computer disk).
The invitation and promotional materials should include a note that asks participants to request any additional requirements they may have in order to fully participate in the meeting or conference.

**Ensuring accessible communications**

It is important to consider the communication needs of your whole audience when preparing your meeting or conference, and accessibility is one important component of your communication plan. However, accessibility to print documents is not the only need you must take into consideration. It is important to make any oral presentation available to people who are deaf through a qualified sign language interpreter. Print materials need to be made available in French and in formats readily accessible to people who are print disabled.

When preparing for any public event, with or without a disability focus, it is suggested that you:

- Arrange for a sign language interpreter and/or real-time captioner to be present.
- Promote the fact that your materials are available in alternative formats and in French, and provide contact information on how to obtain these formats on printed materials.
- Display, and have available for distribution, materials prepared in alternative formats in both French and English.
• Adjust the numbers of multiple format documents you will need according to the anticipated audience. For example, if the anticipated audience consists of seniors, you may consider producing a greater number of printed materials in large print.
• The following is a guideline for quantities for a general public event, such as a trade show or exhibit:
  - One English and one French Braille copy for display
  - Two English Braille copies and one French Braille copy for distribution
  - One English and one French large print copy for display
  - Five large print copies of English and three large print copies of French for distribution
  - One English and one French audio cassette for display with large print/Braille labels. Consider CD ROM format in addition to tape.
  - Five English and two French audio cassettes for distribution with large print/Braille labels. Consider CD ROM format in addition to tape.
  - One English and one French computer disk for display with large print/Braille labels. Consider CD ROM format in addition to disk.
  - Five English and two French computer disks for distribution with large print/Braille labels. Consider CD ROM format in addition to disk.
  - For small sized promotional materials such as a bookmark, copies are available in English and French with Braille overlay indicating the name
of the document and contact information. For an anticipated audience size of 500 attendees, 200 English and 50 French copies.

• Respond to specific customer's requests for preferred alternative formats by making post-event production and delivery arrangements if required.

**Communication Support Services**
Communication support services help people with disabilities access information presented orally at meetings, conferences, and public events. In pre-event planning, each participant should be asked if they require any special accommodations.

**Sign Language Interpreters**
A sign language interpreter is necessary whenever communication is required between deaf and (non-signing) hearing people. Interpreters should be available at events, meetings or presentations attended by people who are deaf or hard of hearing.

**Real-Time Captioning (also known as CART)**
Real-time captioning can make a meeting or presentation accessible to people who are deaf or hard of hearing and who may not use sign language. It provides simultaneous (real-time) speech to text translation. A real-time captioner uses a court reporting steno machine, coded to type verbatim text with minimal keystrokes. The steno machine is connected to a laptop containing special software that converts the key strokes and displays the text being spoken for the user to read on an overhead screen or monitor.
Computerized Notetakers
Computerized notetaking is a service that can make a meeting or presentation more accessible to people who are deaf or hard of hearing. It may also be requested by people with vision disabilities because it allows them to refer to the saved electronic notes afterwards using screen reading software. Notetakers use a laptop computer with a standard keyboard and an overhead screen or monitor. Computerized notetaking is not a verbatim transcript, but summarizes what is spoken while still maintaining accuracy and the spirit and intent of the speaker.

Assistive Listening Systems
An assistive listening system receives a feed from the audio system found in lecture halls or meeting or conference rooms. This communication support makes it easier for people who are hard of hearing to hear and understand speech even from a distance. For example, a wireless FM system, which consists of a transmitter and receiver, can be used with or without a hearing aid.

Intervenors
Intervenors may guide and interpret for people who are deaf-blind. Intervenors are trained in special sign language that involves touching the hands of the client in a two-hand, manual alphabet or finger spelling.
Communication Support Attendants
Communication support attendants help people with intellectual disabilities access information presented orally at meetings, conferences, and public events.

Providing attendant care services
Attendant care services to people with disabilities include assistance with personal care and escorting to community outings. To ensure that adequate arrangements are made, ask the participant prior to the event about the level and type of service required. Clearly describe the specific needs of the participant to the vendor.

Meeting Accessibility Policy of the Canadian Hearing Society
The Canadian Hearing Society (CHS) supports the rights of people who are deaf and hard of hearing and is committed to ensuring accessibility to information communicated during all meetings, workshops and other communication sessions. It is therefore the CHS policy that any meetings, workshops or other sessions follow the following guidelines for accessibility and communication. It is the responsibility of the designated Chairperson of the meeting to ensure the policy is adhered to and that accessibility issues are prepared for prior to the commencement of the session in question.

Interpreters and Real-Time Captioners/Notetakers
Every session will have sufficient interpreters and/or real-time captioners/notetakers. Which service(s) will be provided will depend on the participant’s request. Based on availability, a real-time captioner will be the preference over a notetaker. Presenters must remember that
the captioner/notetaker is in a fixed position due to equipment. All equipment must be in
good working condition. Should there be any problem with accessibility requirements e.g.
interpreters or captioner/notetaker not available, equipment not working, the session will be
cancelled. Furthermore, should accessibility requirements falter during the session e.g.
equipment stops working, the session will be stopped until the required adjustments are
made.

Facilities/Meeting Flow
Prior to beginning the session, the Chairperson will ensure that all physical adjustments are
made e.g. blinds and lighting adjusted as required. The Chairperson will designate
someone to keep a speakers list to assist with time management and the flow of the
meeting.

Sightlines
Everyone (including interpreters, captioner/notetaker) must be able to see each other and
the presentation clearly. Seating must be made available for those who lip read to ensure
sightlines. Tall objects such as water bottles should be kept off the tables. Equipment must
be positioned in the least restrictive spot.

Noise
Common background noises can interfere with hearing speech (for anyone). All present
should avoid noises such as flipping pages, rocking chairs and sliding coffee mugs while
speaking. Likewise, if the overhead projector is not being used, it should be turned off.
Consider visual noise as well. One example is to avoid cluttering the wall directly behind
the presenter with flip chart paper. Avoid mannerisms or bright clothing that create visual distractions.

**Reading Time**
Presenter should pause to allow participants to look at overheads, papers, or other visuals. Stop speaking and wait for the participants to resume eye contact.
WAYS TO PROVIDE BETTER SERVICE TO CUSTOMERS WITH DISABILITIES

• Treat people with disabilities with the same respect and consideration you have for everyone else.

• Patience, optimism, and a willingness to find a way to communicate are your best tools.

• Smile, relax, and keep in mind that people with disabilities are just people.

• Do not make assumptions about what type of disability or disabilities a person has.

• Some disabilities are not visible. Take the time to get to know your customers’ needs.

• Be patient. People with some kinds of disabilities may take a little longer to understand and respond.

• If you're not sure what to do, ask your customer, "May I help you?"
• If you can’t understand what someone is saying, just politely ask again.

• Staff must be fully attentive to customer.

• Ask before you offer to help — don’t just jump in. Your customers with disabilities know if they need help and how you can provide it.

• Find a good way to communicate. A good start is to listen carefully.

• Look at your customer, but don’t stare. Speak directly to a person with a disability, not to their interpreter or someone who is with them.

• Use plain language and speak in short sentences.

• Do not touch or address service animals – they are working and have to pay attention at all times.

• Ask permission before touching a wheelchair or a piece of equipment.

• Do not tell a person using a wheelchair to sit instead provide a waiting area / space that accommodate wheelchairs.
• Every business should have emergency procedures for customers with disabilities. Make sure you know what they are.
• Every staff person should have the highest regard for the privacy of personal information and the highest standard for protection of personal information
Vision Disabilities

• Identify yourself when you approach your customer and speak directly to them.

• Speak normally and clearly.

• Never touch your customer without asking permission, unless it’s an emergency.

• If you offer assistance, wait until you receive permission.

• Offer your arm (the elbow) to guide the person and walk slowly.

• Do not touch or address service animals – they are working and have to pay attention at all times.

• If you’re giving directions or verbal information, be precise and clear. For example, if you’re approaching a door or an obstacle, say so.

• Do not just assume the individual can't see you.
• Do not leave your customer in the middle of a room. Show them to a chair, or guide them to a comfortable location.

• Identify landmarks or other details to orient your customer to the environment around them.

• Do not walk away without saying good-bye.

• Be patient. Things may take a little longer.
Deaf or Hard of Hearing

• Always ask how you can help. Do not shout.

• Attract the customer’s attention before speaking. The best way is a gentle touch on the shoulder or gently waving your hand.

• Make sure you are in a well-lighted area where your customer can see your face.

• Look at and speak directly to your customer. Address your customer, not their interpreter.

• If necessary, ask if another method of communicating would be easier, for example a pen and paper.

• Do not put your hands in front of your face when speaking.

• Be clear and precise when giving directions, and repeat or rephrase if necessary. Make sure you have been understood.
• Do not touch or address service animals – they are working and have to pay attention at all times.

• Any personal (e.g., financial) matters should be discussed in a private room to avoid other people overhearing.

• Be patient. Communication for people who are deaf may be different because their first language may not be English. It may be American Sign Language (ASL).

• If the person uses a hearing aid, try to speak in an area with few competing sounds.
Deaf-Blind

• Do not assume what a person can or cannot do. Some people who are deaf-blind have some sight or hearing, while others have neither.

• A customer who is deaf-blind is likely to explain to you how to communicate with them or give you an assistance card or a note explaining how to communicate with them.

• Speak directly to your customer as you normally would, not to the intervenor.

• Identify yourself to the intervenor when you approach your customer who is deaf-blind.

• Do not touch or address service animals – they are working and have to pay attention at all times.

• Never touch a person who is deaf-blind suddenly or without permission unless it’s an emergency.
Physical Disabilities

• Speak normally and directly to your customer. Don’t speak to someone who is with them.

• People with physical disabilities often have their own ways of doing things. Ask before you help.

• Be patient. Customers will identify their needs to you.

• Do not touch assistive devices, including wheelchairs, unnecessarily unless it’s an emergency.

• Provide your customer information about accessible features of the immediate environment (automatic doors, accessible washrooms, etc.).

• Remove obstacles and rearrange furniture to ensure clear passage.
Speech or Language Impairments

- Just because a person has one disability doesn’t mean they have another. For example, if a customer has difficulty speaking; don't assume they have an intellectual or developmental disability as well.

- If you don’t understand, ask your customer to repeat the information.

- If you are able, ask questions that can be answered 'yes' or 'no'.

- Be patient and polite, and give your customer whatever time he/she needs to get his/her point across.

- Do not interrupt or finish your customer’s sentences. Wait for them to finish.

- Patience, respect and a willingness to find a way to communicate are your best tools.
Mental Health Disabilities

• Treat a person with a mental health disability with the same respect and consideration you have for everyone else.

• Be confident and reassuring. Listen carefully and work with your customer to meet their needs.

• If someone appears to be in a crisis, ask them to tell you the best way to help.
• Be sensitive to the shifting mental competency of individuals; it may take a few visits or interactions to resolve service issues.
**Intellectual or Developmental Disabilities**

- Do not assume what a person can or cannot do.
- Use plain language and speak in short sentences.
- Make sure your customer understands what you’ve said.
- If you can’t understand what’s being said, don’t pretend. Just ask again.
- Provide one piece of information at a time.
- Be supportive and patient.
- Speak directly to your customer, not to their companion or attendant.
Learning Disabilities

• Patience and a willingness to find a way to communicate are your best tools.

• When you know that someone with a learning disability needs help, ask how you can best help.

• Speak normally and clearly, and directly to your customer.

• Take some time — people with some kinds of learning disabilities may take a little longer to understand and respond.

• Try to find ways to provide information in a way that works best for them. For example, have a paper and pen handy.

• If you’re dealing with a child, be patient, encouraging and supportive.

• Be courteous and patient and your customer will let you know how to best provide service in a way that works for them.
Visiting or Delivering to Customers with Disabilities at Home

• Do not arrive unexpectedly, and confirm the details before you arrive.

• Be patient. You may need to wait a few moments for your customer to open the door.

• Introduce yourself clearly. Some customers may not be able to read identity cards and may instead have a password. Check before you visit.

• Keep your customer up to date on what you’re doing.

• If you need to move some of your customer's possessions, make sure that you leave their house exactly as when you arrived. For example, you don’t want someone with a vision disability to trip because you moved the sofa.

• If you can’t complete the job, clearly explain what will happen next. Make another appointment, and leave a contact number in case there are problems.
Dealing with Customer with Disabilities on the Telephone

• Speak normally, clearly and directly.

• Don’t worry about how their voice sounds. Concentrate on what’s being said.

• Be patient, don’t interrupt and don’t finish your customer’s sentences. Give your customer time to explain him/herself.

• Do not try to guess what your customer is saying. If you don’t understand, don’t pretend. Just ask again.

• If you’re not certain what was said, just repeat or rephrase what you’ve heard.

• If a telephone customer is using an interpreter or a TTY line, just speak normally to the customer, not to the interpreter.

• If your customer has great difficulty communicating, make arrangements to call back when it’s convenient to speak with someone else.
# AODA Customer Service Standard
## Implementation Work Plan

**September 28, 2009**

<table>
<thead>
<tr>
<th>Required Activity</th>
<th>Description</th>
<th>Status</th>
<th>Timeline</th>
<th>Responsible Persons</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1</strong> Policies</td>
<td>General Policy re: commitment to accessibility</td>
<td>General policy statements are included in Equity &amp; Inclusion Policy</td>
<td>Policy to SMT in November; to A&amp;A or COW in December</td>
<td>Consultants/ Access &amp; Equity Office</td>
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<tr>
<td></td>
<td>Sub-policies (e.g. Service Animals, Support persons, Service Disruptions, Feedback process, Admission Fees, communication, documentation, etc.)</td>
<td>Sub-policies being drafted – will be circulated to Access &amp; Equity Staff Committee &amp; Directors for feedback</td>
<td>Sub-policies to ACPD in November; to A&amp;A or COW in December</td>
<td>Access &amp; Equity Office; Access &amp; Equity Staff Committee &amp; departmental directors provide feedback through late October / early November</td>
</tr>
<tr>
<td><strong>2</strong> Procedures</td>
<td>General Procedures Specific Procedures, to implement the policies.</td>
<td>Community, Advisory Committee feedback completed; process development underway</td>
<td>To be completed by end of November</td>
<td>Access &amp; Equity Office in conjunction with feedback from Access &amp; Equity Staff Committee</td>
</tr>
</tbody>
</table>
| 3 | Tool Kit | On-line resources re:  
- “how to” service people with disabilities  
- resources – contacts for services  
- accessibility equipment & how to use it  
- accessible meeting checklist  
- “how to” recognize accessibility feedback / complaints  
- feedback forms and process  
- standards for clear print & large print  
- web authors guide for accessibility | Majority of research complete, and drafts being created | To be completed by end of November | Developed by Access & Equity Office  
Feedback from Access & Equity Staff Committee and ACPD; collaboration with IS & City Manager’s Office staff |
|---|---|---|---|---|
| 4 | Roll-out Options | Communications to staff of tool kit resources and policies/procedures by year end. Q & A drop-in sessions planned for late November, early December. | Planning underway. | To be completed by end of November | Access & Equity Office  
All Departments Communication Staff |
| 5 | Selecting & Ordering Equipment | Accessibility equipment (large print monitor, way finding, text machines, reading software, hearing devices, etc.) | Feedback from staff at Accessibility Resource Fair – September 29 2009  
Selection of type of | Access & Equity Office  
Input about needs & quantities from |
<p>| | | | | |</p>
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<tbody>
<tr>
<td></td>
<td></td>
<td>equipment &amp; where to deploy drafted</td>
<td>all departments Purchasing staff</td>
<td></td>
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<tr>
<td>6</td>
<td>Training</td>
<td>3 modules – # required is dependent on function of position - general provisions - front-line service delivery policy development</td>
<td>RFP to be issued – 3 modules; general module to be electronic based</td>
<td>Training RFP to be issued in October; development of modules by year-end; pilot in January, 2010; roll out in February, 2010</td>
</tr>
<tr>
<td>7</td>
<td>Technology Changes</td>
<td>• voice activated directory on 546-2424 • Review &amp; update of Web Authors guidelines to maximize accessibility for new and revised web documents • Inventory &amp; review of on-line forms for accessibility underway • Text to speech functionality required for all public access computers</td>
<td>Inventory of on-line forms underway Review of Text to speech options underway</td>
<td>To be completed by end of December</td>
</tr>
<tr>
<td>8</td>
<td>Complaint &amp; Feedback Tracking</td>
<td>Electronic tracking of feedback &amp; complaints; manual/hard copy</td>
<td>Recommendation for Systems Architect:</td>
<td>To be completed</td>
</tr>
<tr>
<td>#</td>
<td>Task Description</td>
<td>Details</td>
<td>Completion Date</td>
<td>Responsible Party</td>
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<tr>
<td>9</td>
<td>Publication of Standards, Policies &amp; Procedures</td>
<td>All policies, and procedures must be available in alternate formats; the availability of the documents must be published</td>
<td>To be completed by end of December</td>
<td>Access &amp; Equity Office Communications staff</td>
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<td>Web pages being created to store the information;</td>
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<td></td>
<td>Assessment of facilities underway to meet minimum accessibility or to detail current level of accessibility</td>
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<td>To be completed by end of December</td>
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<tr>
<td>10</td>
<td>Facility Improvements</td>
<td>Primary public service locations to have accessible counters, ramps, automatic door openers &amp; accessible washrooms</td>
<td></td>
<td>Facilities staff in conjunction with Access &amp; Equity Office and departmental managers</td>
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<td>One or more service locations to be accessible where there are multiple locations</td>
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<td>Publish the accessible locations &amp; the degree of accessibility</td>
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<td>Assessment of facilities underway to meet minimum accessibility or to detail current level of accessibility</td>
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<td>To be completed by end of December</td>
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<td>Each department to assess &amp; publish the locations for accessible service</td>
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<tr>
<td>11</td>
<td>Communications Plan</td>
<td>Communications required both internally and externally</td>
<td>Communications plan being developed; communications to be drafted</td>
<td>To be completed by end of November</td>
</tr>
<tr>
<td>12</td>
<td>Implications Report</td>
<td>Request for Implications report from COW</td>
<td>Draft report completed; distributed for comment to departmental staff; briefing for SMT</td>
<td>early October</td>
</tr>
</tbody>
</table>
MEMBER COMMUNICATION

Alert No: 09/067

To the attention of the Clerk and Council

September 28, 2009

For more information contact:
Petra Wolfbeis, AMO Senior Policy Advisor
(416) 971-8856 ext 329

AMO’s Message to the Province:
Accessibility and Municipalities at Risk
with Initial Proposed Built Environment Standard

Issue:
On July 14, 2009, the government released the initial proposed Accessible Built Environment Standard under the Accessibility for Ontarians with Disabilities Act for public review. The initial proposed standard sets out specific requirements for making the built environment in Ontario accessible, including all new construction.

AMO is strongly encouraging municipalities to respond to the public review. The deadline to respond is October 16, 2009.

Background:
AMO continues to support the need for increased and improved accessibility for Ontarians in all aspects of community and civic life. AMO believes that since the enactment of the AODA four years ago, important advancements have been made in discussions on the key barriers to achieving accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises.

AMO also appreciates the government’s inclusive approach to the standard development process and at the same time appreciates the challenges associated with reaching “consensus” on issues in a process where common ground has not been clearly defined.

Bearing this in mind, it is unclear the degree to which the initial proposed Built Environment Standard as written will improve accessibility for people with disabilities.

It is important to note, that the financial burden and expectations the proposed standard places on municipalities will not only undermine the objectives of the Act and the potential for greater accessibility for all Ontarians, but conflict with the provincial objective of “Open for Business.” The timelines, requirements and cost of implementing all of the requirements proposed in the standard may undermine Ontario’s competitiveness.

AMO will be providing a detailed response to the Built Environment Standard Development Committee and will be responding to Minister Milleur. Addressing key areas of concern related to the continued lack of harmonization across standards, the overall scope and applicability of the standard and the cost impact on municipalities if the standard is implemented as proposed, AMO’s key recommendations are:
1. AMO is recommending that the Government adopt the proposed model for harmonization, *The Case for Harmonization of AODA standards*.

2. AMO is recommending that in the absence of financial support to municipalities to implement the AODA, the Province should reject retrofit requirements. In addition, the Government should conduct a thorough impact analysis on the economic implications of implementing the standard as proposed.

3. AMO recommends that if the standard is to include compliance when undertaking renovations, flexibility must be provided in recognition that in some cases compliance is not feasible. Rather than a specific definition for compliance, degrees of accommodation should be considered. However, prior to any acceptance of the standard into regulation, high minimum thresholds for compliance must be developed in consultation with the building sector and construction industry representatives.

4. AMO recommends that maintenance be removed from the proposed built environment standard as standards currently exist in municipal by-laws and provincial legislation such as the Highway Traffic Act.

5. AMO recommends that the technical requirements set out in the proposed standard be reviewed by industry experts prior to finalizing any aspects of the standard. AMO also recommends that the cost implications be understood by way of an impact analysis and that the cost implications be considered in timelines to implement as well as through appropriate provincial funding.

6. AMO recommends that administration responsibilities be significantly reduced and be integrated into existing Provincial government processes. And, that increased administrative costs and impacts resulting from implementation and compliance review of the standard be paid for by the provincial government.

7. AMO recommends in light of the potential province-wide financial impact of the proposed standard, further impact analysis is required to ensure that the Ministry is fully aware of the economic implications prior to the adoption of a regulation.

Regarding the proposed harmonization model, AMO believes that if the government chooses to adopt the proposed harmonization model, many of the concerns, including the cost and human resource implications of implementing any and all of the proposed standards will be addressed and significantly mitigated.

Action: AMO recommends that municipalities endorse *The Case for Harmonization of the AODA Standards* and include the model as a recommendation in your public review response to the initial proposed Built Environment Standard. AMO will continue to work with the government and municipalities to ensure the implementation of the AODA is fiscally responsible and manageable and to ensure the intent and objectives of the Act are achieved by 2025.

This information is available in the Policy Issues section of the AMO website at [www.amo.on.ca](http://www.amo.on.ca).