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# ACCESSIBILITY PROGRESS REPORT

December 2019

# Accessibility for Ontarians with Disabilities Act (AODA)

The government of Ontario enacted the AODA in 2005, building the framework for compliance with mandatory accessibility standards, stage by stage. The AODA requires by law, that all service providers remove barriers faced by people with disabilities.

The purpose of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is to ensure that all Ontarians have fair and equitable access to programs and services and to improve opportunities for persons with disabilities moving organizations in Ontario forward on accessibility with the long term goal of a barrier-free Ontario by 2025.

Recognizing the history of discrimination against persons with disabilities in Ontario, the Act is to benefit all Ontarians by:

- a) developing, implementing and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025; and
- b) providing for the involvement of persons with disabilities, of the Government of Ontario and of representatives of industries and of various sectors of the economy in the development of the accessibility standards.

This Act applies to every person or organization in the public and private sectors of the Province of Ontario, including the Legislative Assembly of Ontario.

A person or organization may be subject to more than one accessibility standard.

## Accessibility Standards

Accessibility standards shall:

- a) set out measures, policies, practices or other requirements for the identification and removal of barriers with respect to goods, services, facilities, accommodation, employment, buildings, structures, premises or such other things as may be prescribed, and for the prevention of the erection of such barriers; and
- b) require the persons or organizations named or described in the standard to implement those measures, policies, practices or other requirements within the time periods specified in the standard.

Ontario businesses must follow the Integrated Accessibility Standards Regulation (IASR) to prevent and remove barriers for people with disabilities.

The IASR includes five standards in the areas of:

1. Information and communication
2. Employment
3. Transportation
4. Design of public spaces
5. Customer service

#### Compliance Reporting Requirements

The AODA give government authority to set monetary penalties to enforce compliance with accessibility standards. The maximum penalties under the AODA include:

- A corporation/organization that is guilty can be fined up to \$100,000 per day
- Directors and officers of a corporation/organization that is guilty can be fined up to \$50,000 per day

## Disability Defined

The Accessibility for Ontarians with Disabilities Act uses the same definition of disability as the Ontario Human Rights Code.

When we think of disabilities, we tend to think of people in wheelchairs and physical disabilities – disabilities that are visible and apparent. But disabilities can also be non-visible. We can't always tell who has a disability. The broad range of disabilities also includes vision disabilities, deafness or being hard of hearing, intellectual or developmental, learning, and mental health disabilities.

**disability** [dis-uh-bil-i-tee] . . .

- any degree of physical 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
- a condition of mental impairment or a developmental disability
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- a mental disorder, or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997. (Ontario Human Rights Code 10(1), 1990).

# Ontario Regulation 191/11

## Integrated Accessibility Standards

Businesses and organizations that have at least one employee and that provide goods, services or facilities to the public, and other businesses and organizations, are subject to the regulation. As a public sector organization, under the Public Hospitals Act, this includes Nipigon District Memorial Hospital.

Depending on the type and size of the business or organization, compliance deadlines range from January 1, 2012, until December 31, 2025

What is the Integrated Accessibility Standards Regulation(IASR)?

The Parts of the IASR that apply to Nipigon Hospital include:

- Part I - General
- Part II - Information and Communication Standards
- Part III - Employment Standards
- Part IV.1 - Design of Public Spaces Standards
- Part IV.2 - Customer Service Standards

### PART I - GENERAL

#### ESTABLISHMENT OF ACCESSIBILITY POLICIES

*Every organization shall develop, implement, and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements.*

*Obligated organizations shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.*

*Every organization shall:*

- a) prepare one or more documents describing the policies it developed*
- b) make the documents publicly available and, upon request, provide them in an accessible format*

#### Statement of Organizational Commitment

From 2003 to 2010, The Hospital included a Commitment to Accessibility Planning in its Multi Year Accessibility Plans.

A stand alone document defining the Hospital’s statement of Organizational Commitment to accessibility for persons with disabilities was introduced in May 2005. The Statement of Organizational Commitment has been included in the Board’s work plan since 2013.


The schedule of the review/revisions of the Statement of Organizational Commitment is outlined below:

Feb 2009	Oct 2009	Jan 2010	Dec 2013
Dec 2014	Dec 2015	Dec 2017	Dec 2019

The Statement of Organizational Commitment is posted to the Hospital’s website at [www.ndmh.ca](http://www.ndmh.ca)

### Policies and Procedures

The following demonstrates the Hospital’s Accessibility Program policy/procedure portfolio including the review and revision history as well as the integration of accessibility requirements into \* policies that existed prior to making Ontario accessible.

 = indicates a discontinued document

Document	Original	Reviewed/Revised	
Patient Declaration of Values	2014	2016 2019	2017
Statement of Organizational Commitment	2003	2004 2006 2008 2010 2015 2019	2005 2007 2009 2013 2017
Ontario Human Right Code and Disability	2002	2015	2017
Customer Service Standards	2005	2009 2014 2017	2013 2015 2019
Integrated Accessibility Standards General Requirements Information and Communication Employment	2010	2013 2015 2019	2014 2017
Procurement Under the AODA	2013	2014 2017	2015
Alternative Document Format	2010	2013 2015 2019	2014 2017

Accommodation in Employment for Persons with Disabilities	2013	2014	2018 2019
Emergency Evacuation Procedures for Persons with Disabilities	2014	2017 2019	2018
*Pet Visitation	2007	2017	2019
*Patient Relations Process	2001	2005 2008 2011 2016 2019	2006 2010 2014 2017
*Education and Training	1999	2012 2017	2013 2019
*Procurement		2013	
*Recruitment and Selection	2008	2012 2014	2013
*Return to Work	2003	2006 2010 2014	2008 2011 2018
*Employee Performance Evaluation	1990	2006 2015 2018	2009 2016 2019

The Home page of the Hospital’s website provides information on the Hospital’s Accessibility Program. It states that the Hospital shall make the information available to the public and provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request. Contact information is provided.

## ACCESSIBILITY PLANS

*Designated public sector organizations shall,*

- a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this regulation*
- b) post the accessibility plan on their website; and provide the plan in an accessible format upon request*
- c) review and update the accessibility plan at least once every five years*

*Designated public sector organizations shall,*

*Prepare an annual status report on the progress of measures taken to implement the strategy referred to in the plan including:*

- *steps taken to comply with this regulation*
- *post the status report on their website and provide the report in an accessible format upon request*

## Plans / Progress Reports

On September 30, 2003, Nipigon District Memorial Hospital presented its first Accessibility Plan.

In September of 2005, Nipigon District Memorial Hospital posted its Accessibility Plan onto its new website.

The Accessibility Plan included a report of progress and new plans annually as follows:

- September 2004
- September 2005
- September 2006
- September 2007
- September 2008
- September 2009

In December of 2013, a Progress report of achievements from 2009 to 2013 was developed as was a Multi Year Accessibility Plan for 2014-2018 and signed by the Chief Executive Officer.

Progress Reports on the 2014-18 Hospital's Multi Year Accessibility Plan achievements was reported on in:

- December 2014 (reviewed by Senior Team, signed by Chief Executive Officer and posted to website)
- December 2015 (reviewed by Senior Team, signed by Chief Executive Officer and posted to website)
- December 2017 (reviewed by Senior Team, signed by Chief Executive Officer and posted to website)

This year, 2019 with the expertise of persons with disabilities, the development of a new five year Accessibility Plan was undertaken in 2019. The process began with a review of achievements to date, the identification of previously identified opportunities yet to be completed and the review of the Accessibility Plans of similar organizations providing the same services for the purpose of identifying opportunities for improvement that may not have been considered.

- December 2019 ((reviewed by Senior Team, signed by Chief Operating Officer and posted to website)



*Designated public sector organizations shall,*

- a) establish, review, and update their accessibility plans in consultation with persons with disabilities*

This is particularly challenging in a small rural hospital.

Early in 2014, numerous persons with disabilities were requested and declined to review the Accessibility Program documents. The Hospital was successful in engaging one person with disability to review the policies and procedures but that person did not respond to the Hospital with recommendations.

Later in 2014, the Hospital actively engaged a person with a temporary disability to review the Accessibility Program documents and provide recommendations. The Hospital is grateful for recommendations this person provided with “fresh eyes” and implemented the recommendations immediately. In 2015, we followed up with this person to confirm he recommendations were acted upon and to ascertain if there were further recommendations.

In 2019, we sought input from a support person who works for an organization that provides services to disabled clients. As the organization makes use of the services on our health care campus, this feedback is most appreciated.

### **Procuring or acquiring goods, services or facilities**

*Designated public sector organizations shall incorporate accessible design, criteria and features when procuring or acquiring goods, service or facilities, except when it is not practicable to do so.*

*If the organization determines that it is not practicable to incorporate accessible design, criteria and features when procuring or acquiring goods, services or facilities, it shall provide, upon request, an explanation.*

In 2017, The Hospital removed the document “Procurement Under the AODA” and revised the document Process for the Purchase/Modifications of Goods, Services or Facilities to include the requirements of this regulation.

Managers are knowledgeable in the process of procuring goods, services or facilities for purchase or redevelopment. The following opportunities have taken place with consideration having been given to accessibility design, criteria and features.

- 2012 - Handrails were replaced on long term care. Outgoing handrails provided a “pinch grip” which did not fully assist in mobility. However the new handrails have the profile for a “power grip” providing a stronger grip.

- 2015 - Paper towel dispensers purchased and installed close to sinks in public areas at an accessible height.
- 2015 - Pamphlet racks for public information were installed on Acute, LTC and in the ER Department taking into consideration wheelchair seat height.
- 2017 - Servery (Acute Care)  
Complete renovation including lowered counter top, wheelchair cut out to sink and accessibility to the ice/water machine.
- 2017 - Property wide resurfacing project including the removal and replacement of all curbs at the main entrance in favour of a seamless threshold from pavement to sidewalk.
- 2017 - Off street parking is provided on the Hospital property. Signage is erected at the van sized accessible parking spaces at the Main Entrance, ER Entrance and at the Clinic. There are two such spaces at each of these locations. There is one accessible parking space at the staff entrance.
- 2018 - The facility underwent a complete retrofit of its lighting for energy efficient purposes. This initiative has provided the facility with whiter light that provides better color rendering and depth of field.
- 2019 - The main entrance of the facility underwent significant redevelopment with the demolition of the unused tuck shop making way for an open, barrier free entrance. Old heavy seating was replaced with seating that is not fixed. Seating options in the main entrance now include bariatric seating and hip chair seating.
- 2019 - Seating options in the Emergency department now include bariatric seating and hip chair seating.

## **Training**

*Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this regulation and on the Human Rights Code as it pertains to persons with disabilities to:*

- a) all persons who are an employee of, or a volunteer with, the organization*
- b) all persons who participate in developing the organization's policies*
- c) all other persons who provide goods, services, or facilities on behalf of the organization*

*The training on the requirements of the accessibility standards and the Human Rights Code shall be appropriate to the duties of the employees, volunteers and other persons*

*Every person referred to above shall be trained as soon as practicable.*

*Every obligated organization shall provide training in respect of any changes to the policies on an ongoing basis*

Nipigon Hospital's educational requirements for its employees has grown and developed over the years. We are committed to the education and training of all of our employees as this is key to achieving our organizational statement of commitment.

The following demonstrates the Hospital's mandatory training for all employees.

Unless otherwise stated, training was developed by Accessibility Certifier and provided to staff in paper form for completion.

2010	<u>Ontario Hospital Association</u> AODA for Hospitals & Health Care Organizations (E-Learning)
2013	NDMH Customer Service Standard Policy/Procedure
2013	<ul style="list-style-type: none"><li>• Customer Service Standard - Training Resource</li></ul>
2013	<ul style="list-style-type: none"><li>• Customer Service Standard - Choose the Right Words</li></ul>
2014	Accessibility Plan Progress Report, December 2013
2014	Multi Year Accessibility Plan, 2014 - 2018
2014	NDMH Ontario Human Rights Code and Disability Policy
2014	<ul style="list-style-type: none"><li>• Appendix B - Working Together /Quiz</li></ul>
2014	NDMH Integrated Accessibility Standards Regulation
2015	NDMH Organizational Statement of Commitment
2015	"disability" as defined by the AODA
2015	NDMH History of the Ontario Human Rights Code Policy
2015	Appendix A - History of the Ontario Human Rights Code
2015	NDMH Accessible (ak-ses-uh-buh-l) Health Services and Care Pamphlet
2015	NDMH Patient Relations Process Policy/Procedure
2015	NDMH Patient Declaration of Values
2015	NDMH Alternative Document Format Policy/Procedure
2015	Appendix A - General Requirements/Quiz
2015	Appendix B - Information and Communication/Quiz
2015	Appendix C - Employment Standards/Quiz
2015	NDMH Alternative Document Format Policy/Procedure
2015	NDMH Emergency Evacuation Procedures for Persons with Disabilities
2019	NDMH Understanding and Communicating with People with Disabilities

## New Employee

At orientation, appropriate to the duties of the employee includes:

- Surge Learning  
Accessibility Standard for Customer Service (E-Learning)
- NDMH Understanding and Communicating with People with Disabilities

## Volunteers

At orientation,

- Accessibility Standard for Customer Service (Volunteer Handbook)
- NDMH Understanding and Communicating with People with Disabilities

*Every designated public sector organization shall keep a record of the training provided including the dates on which the training was provided and the number of individuals to whom it is provided.*

A record of training provided including the dates on which the training was provided is maintained in the Administration Office.

- In December 2014, 68% of the staff had successfully completed their required education.
- In December 2015, 82% of the staff had successfully completed their required education.
- In December 2019, 83% of the staff had successfully completed their required education

## **PART II - INFORMATION AND COMMUNICATION STANDARDS**

The standard outlines requirements for organizations to create, provide, and receive information and communications that are accessible for people with disabilities. For example, organizations must provide information and communications in an accessible format to people with disabilities upon request and in a timely manner.

### **Definitions and Exemptions**

*If the obligated organization determines that information or communications are unconvertible, the organization shall provide the person requesting the information or communication with,*

- a) an explanation as to why the information or communications are unconvertible*
- b) a summary of the unconvertible information or communications*

This exemption is posted on the Hospital's website.

## **Feedback**

*Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.*

*The organization shall notify the public about the availability of accessible formats and communications supports with respect to the feedback process.*

This requirement is:

- posted on the Hospital's website
- included in the Patient Relations Process, Compliments and Concerns policy/procedure
- Compliments and Concerns Feedback Form
- included in the Accessibility pamphlet

In 2019, for ease of access and confidentiality, survey boxes were posted throughout the facility to anonymously receive feedback forms. At the same location, Compliments and Concerns Feedback Forms and Accessibility Pamphlets can also be found.

## **Accessible formats and communication supports**

*Every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities:*

- a) in a timely manner that takes into account the person's accessibility needs due to disability; and*
- b) at a cost that is no more than the regular cost charged to other persons*

*The obligated organization shall consult with the person making the request in determining the suitability of accessible format or communication supports.*

*Every obligated organization shall notify the public about the availability of accessible formats and communication supports.*

This requirement is included in:

- NDMH Accessibility for People with Disabilities Policy
- NDMH Accommodating People with Disabilities Procedure

Accessible websites and web content

*Designated public sector organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level AA by January 1, 2021.*

*Except when meeting the requirements is not practicable, this section applies:*

- a) to websites and web content, including web-based applications, that an organization controls directly or through a contractual relationship that allows for modifications of the product, and*
- b) to web content published on a website after January 1, 2012*

*In determining whether meeting the requirements of this section is not practicable, organizations may consider, among other things,*

- a) the availability of commercial software or tools or both*

In 2013, NDMH achieved compliance with conforming to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA.

Posted to Nipigon Hospital's website Home Page is:

- the Hospital's commitment and readiness to accommodate persons with disabilities
- how to communicate with the Hospital about your accessibility requirements
- the current Accessibility Plan/Progress Report
- instructions on how to increase the computer monitor font size

In 2014, a television monitor was installed at the main entrance. The monitor is used to communicate our accessibility commitment and provide brief, informative message.

### **PART III - EMPLOYMENT STANDARDS**

The standard requires that employers must make their workplace and employment practices accessible to potential or current employees with disabilities. For example, employers that make an offer of employment to a successful job applicant must inform the applicant of their organization's policies for accommodating employees with disabilities.

*The standards set out in this part apply to obligated organizations that are employers, and*

- a) apply in respect of employees, and*
- b) do not apply in respect of volunteers and other non paid individuals*

## **Recruitment, general**

*Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.*

*The job posting template includes the following statement. “Nipigon District Memorial Hospital is an equal opportunity employer. Upon request, we are prepared to provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.”*

## **Recruitment, assessment or selection process**

*During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.*

*If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.*

## **Notice of successful applicants**

*Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.*

*These requirements are included in:*

- [NDMH Accessibility for People with Disabilities Policy](#)
- [NDMH Recruitment and Selection Policy/Procedure](#)

## **Informing employees of support**

*Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.*

*Employers shall provide the information to new employees as soon as practicable after they begin their employment*

*Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.*

## **Accessible formats and communication supports for employees**

*Where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:*

- a) information that is needed in order to perform the employee's job, and*
- b) information that is generally available to employees in the workplace*

*The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.*

These requirements are included in:

- NDMH Accessibility for People with Disabilities Policy
- NDMH Accommodation Process for Employees with Disabilities Procedure

### **Workplace Emergency response information**

*Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employer's disability.*

*If an employee who received individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.*

*Employers shall provide the information required as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.*

*Every employer shall review the individualized workplace emergency response information:*

- a) when the employee moves to a different location in the organization*
- b) when the employee's overall accommodations needs or plans are reviewed; and*
- c) when the employer reviews its general emergency response policies*

These requirements are included in:

- NDMH Accessibility for People with Disabilities Policy
- NDMH Individualized Workplace Emergency Response Plan for Employee with a Disability



## Documented individual accommodation plans

*Employers shall develop and have in a place a written process for the development of documented individual accommodation plans for employees with disabilities.*

*The process for the development of documented individual accommodation plans shall include the following elements:*

- a) the manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan*
- b) the means by which the employee is assessed on an individual basis*
- c) the manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved, and, if so, how accommodation can be achieved*
- d) the manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of an accommodation plan.*
- e) the steps taken to protect the privacy of the employee's personal information*
- f) the frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done*
- g) if an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee*
- h) the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability*

*Individual accommodation plans shall include:*

- a) information that is needed in order to perform the employee's job, and*
- b) information that is generally available to employees in the workplace*
- c) if required, include individualized workplace emergency response information*
- d) identify any other accommodation that is to be provided*

**These requirements are included in:**

- **NDMH Accessibility for People with Disabilities Policy**
- **NDMH Accommodation Process for Employees with Disabilities Procedure**

## Return to Work process

*Every employer shall:*

- a) develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and*
- b) document the process*

*The return to work process shall:*

- a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and*
- b) use documented individual accommodation plans as part of the process*

*The return to work process referred to in this section does not replace or override any other return to work process created by or under any other statute*

**These requirements are included in:**

- **NDMH Accessibility for People with Disabilities Policy**
- **NDMH Transitional (Modified) Return to Work Program**

## Performance Management

*An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.*

## Career development and advancement

*An employer that provides career development and advancement to its employees shall take into account accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing development and advancement to its employees with disabilities.*

## Redeployment

*An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities*

These requirements are included in:

- NDMH Accessibility for People with Disabilities Policy

## **PART IV.1 - DESIGN OF PUBLIC SPACES STANDARDS**

The design of public spaces standard outlines the need for newly constructed or redeveloped public spaces to be accessible for people with disabilities. For example, organizations must provide accessible parking for people with disabilities when building new or redeveloping existing parking spaces.

### **Accessible Parking**

*Obligated organizations shall ensure that when constructing new or redeveloping off street parking facilities that they intend to maintain, the off street parking facilities and that they meet this regulation.*

### **Exception**

*The requirements in respect of off street parking facilities do not apply to off street parking facilities that are used exclusively for parking for medical transportation vehicles such as ambulances.*

### **Types of accessible parking spaces**

*Off street parking facilities must provide the following two types of parking spaces for the use of persons with disabilities:*

- a) Type A, a wider parking space which has a minimum width of 3,400 mm and signage that identifies the space as “van accessible”*
- b) Type B, a standard parking space which has a minimum width of 2,400 mm.*

### **Access aisles**

*Access aisles, that is the space between parking spaces that allows persons with disabilities to get in and out of their vehicles, must be provided for all parking spaces for the use of persons with disabilities in an off street parking facility and must meet the following requirements:*

- a) they must have a minimum width of 1,500 mm*
- b) they must extend the full length of the parking space*
- c) they must be marked with high tonal contrast diagonal lines, which discourages parking in them, where the surface is asphalt, concrete or some other hard surface*

## Minimum number and type of accessible parking spaces

*Off street parking facilities must have a minimum number of parking spaces for the use of persons with disabilities, in accordance with the following requirement:*

- a) four percent of the total number of parking spaces for the use of persons with disabilities, where there are between 13 and 100 parking spaces in accordance with the following ratio, rounding up to nearest whole number:
  - i. where an even number of parking spaces for the use of persons with disabilities are provided in accordance with the requirements of this paragraph, an equal number of parking spaces that meet the requirements of a Type A parking space and a Type B parking space must be provided*
  - ii. where an odd number of parking spaces for the use of persons with disabilities are provided in accordance with the requirements of this paragraph, the number of parking spaces must be divided equally between parking spaces that meet the requirements of a Type A parking space and a Type B parking space, but the additional parking space, the odd numbered space, may be a Type B parking space.**

## Signage

*Obligated organizations shall ensure that parking spaces for the use of persons with disabilities are distinctly indicated by erecting an accessible permit parking sign.*

In 2017, a property wide resurfacing project was undertaken by the Facilities Manager. This project included the redevelopment of curbing and seamless thresholds from pavement to sidewalks.

Together with the Bruno's Contracting, the Facilities Manager utilized the process for the Purchase/Modifications of Goods, Services or Facilities policy/procedure to ensure these requirements were complied with.

## PART IV.2 - CUSTOMER SERVICE STANDARDS

The standard outlines requirements for removing barriers for people with disabilities so they can access goods, services, and/or facilities. For example, a person who requires the use of a service animal must be permitted to enter the premises. They also must be allowed to keep the service animal with them, unless excluded by law.

## Establishment of policies

*The provider shall use reasonable efforts to ensure that the policies are consistent with the following principles:*

- a) the goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities*
- b) the provision of goods, services or facilities to persons with disabilities be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporary or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities*
- c) persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities*
- d) when communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability*

*The policies must deal with the use of assistive devices by persons with disabilities to obtain, use or benefit from goods, services or facilities or with the availability of other measures, if any, which enable them to do so.*

*Every provider shall prepare one or more documents describing the policies established under this section and, upon request, shall give a copy of any such documents to any person.*

*Every provider shall notify persons to whom it provides goods, services or facilities that the documents required are available on request.*

*The notice may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, or by such other method as is reasonable in the circumstances.*

## Use of service animals and support persons

*If a person with a disability is accompanied by a guide dog or other service animal, the provider shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises.*

*If a service animal is excluded by law from the premises, the provider shall ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider's goods, services or facilities.*

*If a person with a disability is accompanied by a support person, the provider shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.*

*The provider may require a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, the provider determines that:*

- a) a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises*
- b) there is no other reasonable way to protect the health or safety of the person with a disability or the health or safety of others on the premises*

*Every provider shall prepare one or more documents describing its policies with respect to the matters governed by this section and, on request, shall give a copy of any such document to any person.*

*Every provider shall notify persons to whom it provides goods, services or facilities that documents are available upon request*

*The notice required may be given by posting the information at a conspicuous place on the premises owned or operated by the provider, any posting it on the provider's website, or by such other method as is reasonable in the circumstances*

### **Notice of temporary disruption**

*If, in order to obtain, use or benefit from a provider's goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of disruption to the public.*

*Notice of disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.*

*Every provider shall prepare a document setting out the steps that the provider will ensure are taken in connection with a temporary disruption and, on request, shall give a copy of the document to any person.*

*Every provider shall notify persons to whom it provides goods, services or facilities that the document is available on request*

*Notices may be given by posting the information at a conspicuous place on the premises owned or operated by the provider, by posting it on the provider's website, and by such other method as is reasonable in the circumstances.*

## **Training for staff, etc**

In addition to the training requirements set out in the General Requirements,

- a) every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities:
- b) every person who is an employee or, or a volunteer with, the provider
- c) every person who participates in the developing the provider's policies
- d) every other person who provides goods, services or facilities on behalf of the provider

The training must include a review of the purposes of the Act and the requirements and instruction about the following matters:

- a) How to interact and communicate with persons with various types of disability
- b) How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person
- c) How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability
- d) What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities

Every person shall be trained as soon as practicable.

Every provider shall also provide training on an ongoing basis in respect of any changes to the policies.

Every provider shall keep records of the training provided including the dates on which the training is provided and the number of individuals to whom it is provided.

Every provider shall:

- a) Prepare a document that describes its training policy, summarizes the content of the training and specifies when the training is to be provided
- b) On request, give a copy of the document to any person

Every provider shall notify persons to whom it provides goods, services or facilities that the document is available upon request.

The notice required may be given by posting the information at a conspicuous place on the premises owned or operated by the provider, any posting it on the provider's website, or by such other method as is reasonable in the circumstances.

### **Feedback process required**

*Every provider shall establish a process for receiving and responding to:*

*Feedback about the matter in which it provides goods, service or facilities to persons with disabilities*

*The feedback process must specify the actions that the provider will take if a complaint is received about the manner in which it provides goods, services or facilities to persons with disabilities.*

*Every provider shall ensure that the feedback process is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, on request.*

*Every provider shall make information about the feedback process readily available to the public.*

*Every provider shall prepare a document describing the feedback process and, on request, shall give a copy of the document to any person.*

*Every provider shall notify persons to whom it provides goods, services or facilities that documents are available upon request.*

*The notice required may be given by posting the information at a conspicuous place on the premises owned or operated by the provider, any posting it on the provider's website, or by such other method as is reasonable in the circumstances.*

### **Format of documents**

*If a provider is required by this Part to give a copy of a document to a person with a disability, the provider shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support:*

- a) in a timely manner that takes into account the person's accessibility needs due to disability*
- b) at a cost that is no more than the regular cost charged to other persons*

*The provider shall consult with the person making the request in determining the suitability of an accessible format or communication support.*



These requirements are included in:

- NDMH Accessibility for People with Disabilities Policy
- NDMH Accommodating People with Disabilities Procedure

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Judy Jean, Certifier  
December 17, 2019

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Cathy Covino, Chief Operating Officer  
December 17, 2019