

People Access

Making accessibility easier



Special Healthcare Provider Edition

of the

Accessibility Standards for
Customer Service
Compliance Kit

under the

Accessibility for Ontarians with
Disabilities Act, 2005 (AODA)

People Access is a division of



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Accessibility for Ontarians with Disabilities Act (AODA): What Is It and Does It Apply to Me?

The purpose of the Accessibility for Ontarians with Disabilities Act, also known as the AODA, passed into law in 2005 to enable people with disabilities to fully participate in all activities in the province. To achieve the AODA objective of an accessible Ontario by 2025, five standards have been created that will require organizations, including health care practices, clinics, associations, and colleges, to provide:

- Accessible Customer Service
- Accessible Employment
- Accessible Information and Communication
- Accessible Transportation
- Accessible Built Environment

What is considered a disability under this legislation and its regulations?

Visible and invisible disabilities that may be temporary, short-term, long-term or permanent are all included in the definition of disability for the AODA and its regulations. The emphasis is on the accommodation needs of the person, rather than the identification of the person's disability or disabilities.

Types of disabilities include:

- mobility
- vision
- hearing
- deaf-blindness
- speech or communication
- mental health
- intellectual or developmental
- learning
- sensory perception

Also included are people with seizure disorders, severe allergies, heart conditions, cancer, or any other disease or condition that affects people in such a way that they require an accommodation to access services or employment.

Are all these Standards currently law?

Ontario Regulation 429/07, the Accessibility Standards for Customer Service Regulation, has been law since January 2008 and if you are an employer in the private or non-profit sector, you must comply with this standard by January 1, 2012. The public sector had to comply two years earlier.

Ontario Regulation 191/11, the Integrated Accessibility Standards Regulation (IASR), has been law since July 2011 and includes three standards, namely Employment, Transportation, and Information & Communication. Compliance dates are spread out over the next 6 years.

This IASR has only one requirement that you must meet by January 1, 2012. You must ensure that if you have an emergency measures plan for your organization, it is an accessible plan that takes into account the needs of people with disabilities.

The last regulation will deal with the Accessible Built Environment Standard and it has been released as a draft only, so it is not yet law. The government has stated that when this Standard becomes law, it will apply to new buildings and major renovations only.

Who has to comply?

Every organization offering goods or services in Ontario and having at least one employee in Ontario must comply.

In the healthcare sector, this means that every hospital, clinic, lab, and private practice with at least one employee who works full time, part time or part-year must comply. In addition, every association and regulatory organization, as well as academic healthcare or medical colleges, must comply.

Only non-incorporated practitioners with no employees and organizations run entirely by volunteers are excluded.

Organizations that have twenty or more employees have a few more requirements around documenting their accessibility and reporting on their compliance, so be sure you take this into account when you look at the requirements.

How do I count my employees? Does the number include volunteers and casual help?

If you have to prepare an annual T-4 “Statement of Remuneration Paid” for a staff member, that person is considered an employee. This includes all full-time, part-time, and part-year employees. Volunteers and contracted workers are not considered employees.

I don't have customers. I have patients, clients or members. Are you sure this applies to me?

The word “customer” refers to anyone that an organization, professional or practitioner provides goods or services to. This could include patients, clients, members, parishioners, students, the general public, citizens or anyone outside your organization that you serve. In the healthcare sector, most of you will probably refer to your “customers” as “patients, clients or members”, so that’s how we will refer to your “customers” from now on in this kit.

When do I have to be in compliance?

Private sector businesses and non-profit organizations including health care practices, clinics, labs, associations or regulatory colleges must comply with the Accessibility Standards for Customer Service by January 1, 2012.

The broader public sector, including hospitals, academic colleges and universities schools, municipalities and the provincial government, were required to comply with the Accessibility Standards for Customer Service by January 1, 2010.

What will happen if I don't comply?

You may be audited, inspected and/or fined if you do not comply. The government hopes that all organizations, including healthcare sector practices, clinics, centres, associations, and colleges will see the benefits of accessibility to build your client, patient or member base and to provide better service for everyone. Therefore, if you are found to be non-compliant, the government may first offer you support in terms of information or training. However, if you still don't comply, you may be issued a Director's order or an administrative monetary penalty.

Note that if you submit a false accessibility compliance report, fail to comply with a Director's order, or prevent an enforcement officer sent out to inspect your premises from doing his or her job, you will have committed an offence. The AODA provides for fines for such an offence that can be as high as \$100,000 a day for an organization, and up to \$50,000 a day for an individual in your clinic, lab, practice, association or college.

Will regulatory colleges or professional associations have responsibility for monitoring or regulating my compliance with accessibility standards?

No, only the government has the responsibility for monitoring and regulating compliance with regulations under the AODA. Your professional association and/or regulatory college can be a resource for information and tools that will help you comply. Many healthcare associations and regulatory colleges are working with *People Access*, a division of Excellence Canada, to help develop tools and to get information out to healthcare providers to ensure that they can comply.

I am a healthcare professional who works out of an office in a hospital, but I am not a hospital staff member. Do I have responsibility for accessible customer service, or is this the responsibility of the hospital?

The hospital does have responsibility to ensure that anyone who it contracts with, and is seen as representing the hospital, has been trained in providing accessible customer service. However, this is where the hospital's responsibility ends. As a separate healthcare provider, if you are incorporated and/or have any employees of your own, you are responsible for ensuring that you provide accessible service to your patients or clients.

I rent my office space. How can I be held responsible for making my office accessible?

The accessible customer service standard is not about bricks and mortar or ramps and elevators. These structural accessibility features will be covered under the Accessible Built Environment Standard that is not yet law.

However, whether you rent or own, if your premises aren't physically accessible you still have a responsibility to provide accessible customer service. If your office is not accessible for someone who has a mobility disability or another disability that makes it difficult for them to come to your office, you need to decide how you could provide accessible service to them. For example, can you make arrangements with a colleague who has an accessible office, to use his or her

premises when you have a patient, client or member who cannot access your office? Can you go to the person's home or to a location that the client, patient or member suggests? Can you refer the client, patient or member to another professional?

If you rent your office space, you may want to talk to your landlord to see if there are some changes that could reasonably be made to make your premises more accessible. Sometimes just moving some hall furniture, like bookcases or filing cabinets, can provide enough room for someone in a scooter or wheelchair to use the hallway. You should also ensure that your landlord knows that under the Accessibility Standards for Customer Service, service animals and support people, as well as assistive devices like oxygen tanks, scooters and walkers, must be permitted if a person needs them to access your services.

Note: Your landlord must also be compliant with the Accessibility Standards for Customer Service by January 1, 2012, so he or she must provide accessible service to you. You are the client or customer of your landlord.

We hope we've answered your questions. Now we want to devote the rest of the kit to answer the key question on your mind, "**What do I have to do to comply?**" If you have other questions about the scope of the AODA or whether these standards apply to you, please feel free to contact us by email at info@peopleaccess.ca or by phone at 1-800-263-9648 ext. 224.

LET'S GET STARTED!!

About This Kit

Why use it?

People Access is a not-for-profit organization and an EnAbling Change partner with the Ontario government. In consultation with regulatory experts and with Advisory Committee members from Ontario's regulatory colleges and healthcare associations, *People Access* developed this Kit to simplify the compliance process for small organizations in the medical and healthcare sector.

We understand that time and money are scarce resources in a small business. We also want to help create a more inclusive and accessible society for people with disabilities. This Kit empowers you to begin the process of identifying and removing barriers to accessibility while meeting regulatory requirements quickly and effectively.

You are required to comply with the Accessibility Standards for Customer Service of the AODA by **January 1, 2012**. To best use the short time remaining to meet this compliance date, you can follow the step-by-step instructions in this Kit to satisfy each of the requirements in the checklist on the next page. You will find sample templates in the Appendix to make these steps even easier to complete.

Who is this Kit for?

This Kit has been tailored for clinics, private practices, labs, wellness centres, professional associations, and regulatory colleges in the healthcare sector. Every organization in the private and non-profit healthcare sector that has one employee or more can use this Kit. Even private practitioners with no employees may find this Kit helpful to meet the needs and demands of their patients and clients as the Ontario population learns more about the AODA and its regulations. The Kit is not intended for large organizations, hospitals, academic colleges or universities since they were required to comply with the Accessibility Standards for Customer Service in 2010.

How do I use this Kit?

The Kit is divided into six modules that cover all the requirements of the Accessibility Standards for Customer Service. The sixth module only applies to

you if your practice, clinic, wellness centre, lab, association or college has twenty or more employees.

Module 1: Will help you develop and implement **policies, practices and procedures** that guide you and your employees in providing accessible customer service to people with disabilities

Module 2: Will walk you through the questions and issues you need to consider to comply with the regulation's requirement to allow patients, clients or members to bring **service animals or support people** with them if they need these supports to access your services

Module 3: Explains how you are required to post **notices of service disruption** when facilities or services that people with disabilities usually use to access your services are temporarily unavailable.

Module 4: Explains the scope of **training** you are required to provide for staff, volunteers, contractors or anyone else who interacts with your patients, clients or members on your behalf. Those involved in developing your policies, practices and procedures must also be trained. That usually includes professionals and managers in your practice, clinic, association or college. This module will also point you to training resources you can access to complete this training before the compliance deadline.

Module 5: Establishes a process for receiving **feedback** on how you provide service to customers with disabilities and how you will respond to feedback and take action on any complaints.

Module 6: Explains the **documentation** requirements for practices, clinics, wellness centres, labs, associations and regulatory colleges with twenty employees or more. While these requirements are only mandatory if you have twenty employees or more, even smaller practices, clinics, labs, associations and colleges may find that documentation helps clarify the development and monitoring of accessible services.

This kit has been designed to be a primary compliance tool for people in the healthcare sector who want a clear and succinct explanation of the AODA and the compliance requirements of the Accessibility Standards for Customer Service. You have only to add a training tool and we have provided suggested resources for that.

However, for those who have access to other tools and resources developed by your organization about the Accessibility Standards for Customer Service, we know you will still make use of:

- the questions and answers in the first few pages
- the compliance checklist on page 11
- the policy template in the appendix and temporary disruption and feedback templates in modules 3 and 5
- the reproduction of the government reporting form in module 6

We welcome your feedback on the kit. Please let us know how it meets your needs and what we can do to improve it. You can email us at: info@peopleaccess.ca or call us at 1-800-263-9648 ext. 224.

<h2>What do I need to do?</h2> <h3>Checklist for Accessible Customer Service</h3>

Policies: (Module 1)

- Draft policies, practices and procedures governing the provision of services to people with disabilities
- Include a policy allowing people with disabilities to use assistive devices when accessing your services
- Ensure that your policies and procedures are consistent with the principles of independence, dignity, integration and equal opportunity.
- Document your policies, practices and procedures if your organization has 20 or more employees. If you are a smaller organization you may also choose to document your policies, practices and procedures to provide clarity and proof of accessibility for your employees and clients, patients or members.

Service Animals & Support Persons: (Module 2)

- Ensure service animals are permitted where you are providing your services.
- Ensure support people are also permitted.
If any part of your service requires an admission fee (e.g. for an information workshop) determine whether you will charge full, partial or no fee for the support person
- Document policies, practices, and procedures about service animals and support people if your organization has 20 or more employees.

Notice of Service Disruption: (Module 3)

- Provide Information about the reason, type and length of the disruption
- Identify alternative services available during the disruption e.g. can you provide services in a different location, go to your patients' or clients' homes, ask a colleague to take your patients during the time of disruption?
- Brainstorm on possible disruptions that would impact people with disabilities, so you can act quickly in case of a service disruption e.g. if you know that some of your patients or clients with disabilities rely on your website or email to confirm or change appointments, you

would want to ensure that you posted a notice of service disruption on your website or email message as soon as possible if your computer system or server was down. Many people with disabilities may rely on having a working elevator to get to your office. Ensure that if they are scheduled for an appointment while the elevator is out that you contact them to let them know and if necessary reschedule the date of the appointment, or suggest an alternate solution like coming to their home.

- Decide on different ways and places to post the notice like your front door, your phone message, your website

Training (Module 4).

Training must be provided on the:

- Purpose of the act
- How to interact and communicate with people with disabilities
- How to interact with people with disabilities who use an assistive device ,a service animal, or a support person
- How to use assistive devices that you may have on your premises, such as a TTY or stair chair lift.
- What to do if people with disabilities are having difficulties accessing your services. This would involve training on your policies, practices and procedures about how to provide accessible service for people with disabilities and also on how to interact and communicate with people with disabilities, but applied directly to your location and your patients, clients or members.
- If your organization has twenty or more employees, document the training policy, summary of training contents and details of when the training is to be provided
- Keep track of the dates when training is provided and number of individuals taking the training
- Record attendance/completion of training and the method used for each employee who takes the training

Feedback (Module 5)

- Establish a process for receiving and responding to feedback
- You must allow feedback in a variety of formats such as by telephone, in person, in writing, by email, etc
- The feedback process must include the actions you will take after a complaint or positive feedback is received

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- A description of the process must be available to public. This description can be provided verbally if you are in a practice, clinic, association or college with fewer than 20 employees, but must be written if your organization has twenty or more employees

Documentation (Module 6 - This only applies to you if you have 20 or more employees)

- Develop written policy and procedure documents for each of the previous modules as described in each module.
- Provide notice of availability of all documents in a conspicuous place or places, for example on your website, in communications to your patients, clients or members, or in your reception area. In deciding how and where to provide notice of availability, think of how your patients, clients or members with disabilities are most likely to access information.
- Provide documents in formats appropriate to the person's disability. For example, you might provide a document in large font for someone with low vision, in audio form for someone who is legally blind, in an email for someone who uses a screen reader, in plain language for someone with a learning disability.

Module 1: What Goes into My Policy and Procedures?
Completing your Policy and Procedures in Five Simple Steps

This section walks you through five steps to create policies, practices and procedures that fit your practice, clinic, wellness centre, lab, association, or regulatory college.

Step 1 Read the accessible customer service policy template in the Appendix. Insert the name of your practice, clinic, wellness centre, lab, association or college wherever the document refers to “Practice, clinic, association or college” or “organization”. This may be all you need to do. If you think that this policy works for you, after you personalize the document by inserting the name of your clinic, practice, wellness centre, lab, association or college, just ensure that the policy is in your accepted policy format.

Step 2 However, to be sure that you’ve covered everything, you might want to consider some additional analysis. Start by listing your existing policies, practices and procedures for interacting with or serving your patients, clients or members.

Practical Tips and Examples to Help You Complete this Step:
These policies, practices and procedures can range from informal, verbal instructions like how you greet your patients, clients and members when they arrive at your office, to your telephone instructions on how to leave messages, to a formal procedure like how to protect patient confidentiality.

Step 3 Next, identify any gaps between your policies, practices and procedures and what people with disabilities might need in order to be able to access your goods or services.

Practical Tips and Examples to Help You Complete this Step:

When booking appointments, you might ask your patient or client if they have any special accessibility needs or allergies and also noting these special considerations in their records.

Consider what to do if someone brings a service animal to your office. Some of your patients, clients or members may be afraid of animals or allergic to them. You may decide to have a policy of booking people with service animals on days that you are not booking people with allergies or fears about animals.

You may decide that you want to add the practice of having a pad of paper and pen for people who have a hearing or communication disability to help with clear communication.

On your phone message, you may have allowed only thirty seconds for someone to leave a message. This could be too short for someone with a communication disability and you may decide to lengthen the amount of time allowed.

Step 4 Ask yourself if your policies and procedure are consistent with four principles required by the regulation:

- Independence;
- Dignity;
- Equality of opportunity; and
- Integration.

In other words, do your policies and procedures ensure that people with disabilities will be served in ways that allow them to maintain their independence and dignity?

Practical Tips and Examples to Help You Complete this Step:

If you require patients to fill out medical history forms, how would you accommodate a person with low vision or a learning disability who can't read and complete the form on their own? You might ask how you could help them and/or offer to complete the form with them, reading it out loud and inserting their answers. Do your policies and principles ensure that clients, patients or members with disabilities will have the same opportunity to access your health care services?

How would you or your staff serve a person with dementia who does not want to be touched?

Will the services you provide to people with disabilities be integrated with the services you provide generally to your patients, clients or members?

How would you handle a person with a mental health disability who is pacing and talking out loud to themselves in the waiting room? www.camh.ca has free mental health and addictions 101 tutorials to provide tips on how to interact with people with mental health disabilities, but generally, speaking calmly and respectfully to the person and asking how you can help can go a long way towards providing accessible service.

Step 5 Now, go back to the accessible customer service policy template provided and decide whether you can use it as is, with the name of your clinic, practice, association or college included, or whether you want to add some policies or procedures to the document to make it really reflect your day-to-day practices and policies.

Module 2: Notice of Service Disruptions

What temporary disruptions do I have to provide notice for?

People with disabilities may rely on certain facilities, services or systems to access your health services. Escalators and elevators, for example, are important to people with mobility disabilities because that may be the only way they can reach your premises. You may also have other systems and services designed to meet the needs of people with disabilities, such as accessible washrooms, amplification systems, and note-taking or TTY services. Basically, you must provide a notification of disruption for any location, technology or method that a person with a disability must use to access your goods or services.

You must provide notice of all disruptions, even those that you did not expect. If you know ahead of time that a disruption will occur, provide notice a reasonable time in advance. When a disruption occurs unexpectedly, such as when technology breaks down, you must still provide notice as soon as possible since some people with vision, mobility or learning disabilities may rely on your website or email to gain access to information about your services.

Consider the steps that you will take if a temporary disruption occurs, including:

Step 1: Decide when, where, and how you will provide notice about a temporary disruption.

Practical Tips and Examples to Help You Complete this Step:

Consider the different ways you can post the notice to make sure that as many people as possible will learn of the disruption—e.g. on your telephone message, on your website, as an automatic email reply, on the entrance to your building, on the entrance to your office? If a major, longer term disruption occurs that could make it impossible for many people with disabilities to access your services, you might think about arranging for a radio, local tv station or local newspaper notice as well.

Step 2: Consider What Steps you will take when an unexpected disruption occurs

Practical tips and examples to help you Complete this Step:

You may want to:

- Assign a primary person to organize staff in case of a disruption
- Consider all the different disruptions that could occur that would impact your patients, clients or members with disabilities.
- Plan a course of action for each of these disruptions with your colleagues and staff to help prepare for unexpected emergencies
- Consider what alternative facilities or services, if any, can be made available during the temporary disruption to continue to provide service to people with disabilities? Can you offer your services in a temporary location? Can you arrange with a colleague to take over some of your patients or clients during this period? Can you arrange to go to your clients or patient's work or home locations during this period of temporary disruption?

Step 3: Draft a Notice of Service Disruption Sign

- What information would you include in the notice of a temporary disruption?
- Complete the Notice of Service Disruption Sign Template on the next page

NOTICE of **SERVICE DISRUPTION**

The estimated length of the temporary disruption is from **[insert estimated date and/or time]** to **[insert estimated date and/or time]**.

The following services and/or facilities are currently unavailable:

- **[insert service or facility name and location]** due to **[insert reason for disruption]**
- **[insert service or facility name and location]** due to **[insert reason for disruption]**

The following alternative services and/or facilities are available:

[insert alternative service or facility name and location]

Thank you for your patience in this matter.

For questions or additional information please contact:

Name – [insert department manager or supervisory staff person’s name]

Phone – [insert department manager or supervisory staff person’s phone number]

Fax – [insert department manager or supervisory staff person’s fax number]

Email – [insert department manager or supervisory staff person’s name]

Module 3: Feedback Process

Step 1: Consider all the different ways you will accept feedback.

Practical Tips and Examples to Help You Complete This Step:

- How do you usually communicate with your clients, patients or members?
- Do you know how your patients, clients or members with disabilities prefer to communicate with you?
- Are there some other ways you could communicate with them that would increase the scope of accessible options?
- Try to provide as many options as you can to your clients, patients or members
- Remember that for people with vision disabilities, particularly those who use screen readers and for some people with learning disabilities, intellectual or developmental disabilities, and even some people with physical disabilities affecting coordination and writing ability, paper and electronic forms are often not accessible.

Step 2: Who will receive the feedback?

Practical Tips and Examples to Help You Complete this Step:

You will probably want the feedback to go to a person who regularly communicates with clients, patients or members, particularly if you are using in person or telephone contact, so the process seems integrated with your services generally

Ensure that the person who receives the feedback is given the authority to get the attention of professionals and other employees in your organization so that agreement on steps to take to address the feedback will be prompt and supported across your organization

Step 3: Decide how you will respond to feedback, including complaints

Practical Tips and Examples to Help You Complete this Step

It is not possible to anticipate every type of feedback, but you should develop a process in advance to help you respond to feedback in a timely and consistent way

- Think about who should respond. Do you want one person assigned to be in charge of all responses or do you want to divide responsibility by type of feedback?
- Hold a staff meeting to brainstorm on feedback you might receive and agree on the general approach to help anticipate what you would do in some situations
- Establish a time line for responding to feedback
- Decide how you will communicate back to the person who provided the feedback. Remember to ensure that your communication back to the person is accessible. In most situations, responding to the person in the way they contacted you, is a good rule of thumb

Step 4: Determine how to make information about the process available to all your clients, patients or members

Practical Tips and Examples to Help You Complete this Step

- Remember, you may not know the disabilities, particularly invisible disabilities of all your clients, patients or members, therefore make this information available to all patients
- You may want to have a notice up in your reception area, on your website, even as part of your phone message
- You could also consider putting it on the bill you give patients, in a patient, member or client newsletter, or incorporate it into another form of regular communication with your patients, clients or members.
- You can ask your receptionist to tell people as they are leaving your office that they can submit feedback to them, by phone or through your email address or website.

Step 5: Draft a Feedback response sheet that can be printed or posted on your website. You may want to use the template below as is, or adapt it to your practice, clinic, lab, association or college.

Customer Feedback Form Template

Customer Feedback	
We welcome your feedback on the goods and services we provide. Please provide your comments below:	
If you would like to receive a follow-up from us about how we will respond to your feedback, please provide information about how we may reply:	
By email? E-mail address _____	
By phone? Phone # _____	
In writing? Address _____	
In person? Preferred arrangement _____	
Date: _____	Feedback received by: _____
Please contact us with any further information:[Your organization's information)	
Call: _____	
Email: _____	
Fax: _____	
In writing: _____	

This feedback is collected under the Accessibility for Ontarians with Disabilities Act (AODA) Accessibility Standards for Customer Service. Feedback is responded to by using the following process: [Describe Process Here]	
Thank you for taking the time to provide us with feedback on our services.	

Module 4: Service Animals and Support Persons

Under the Accessibility Standards for Customer Service, you must:

Allow people with disabilities to be accompanied by their guide dogs or service animals in those areas of your premises that are open to the public, unless the animal is excluded by another law.

Permit support people to accompany people with disabilities when they are accessing goods or services in premises open to the public or third parties.

Step 1: Identify those parts of your premises open to service animals

Practical Tips and Examples to Help You Complete this step

- Find out if there are any parts of your facility that are off limits, by law or regulation, to animals. Restaurant kitchens and operating theatres are two locations where animals are not permitted
- Remember, don't make assumptions about this. You may find it difficult to allow animals in some parts of your premises, but under this regulation, you cannot exclude them unless they are prohibited by law.

Step 2: Develop policies, practices and procedures for serving people with service animals.

Step 3: Think about how your services are used by people with support persons and develop policies or procedures to respond to these situations.

Practical tips and examples to help you Complete this step:

Most healthcare organizations have some confidentiality and privacy concerns. If part of the healthcare procedure you provide involves asking a patient or client with a disability to divulge personal information or communicating personal information to the patient with a disability, you should ask the person with a disability to give permission to have this discussion with the support person present, and if he or she agrees, you may want to have the support person sign a confidentiality agreement.

Step 4: If your organization charges an admission fee at any time for patients, clients or members, decide if you will charge an admission fee for a support person.

Practical Tips and Advice to Help You Complete This step:

- Most healthcare providers do not charge admission fees. Professional, medical or healthcare fees are not included.
- However, particularly if you are an association or college, you may hold workshops or conferences that involve an admission fee. Other healthcare providers may hold health fairs that have admission fees.
- If someone will be coming with a support person, determine whether you will ask the support person to pay a full fee, a partial fee or no fee. The regulation does not stipulate which of these you should choose, only that you need to decide and let people know ahead of time.
- Let people know ahead of time, ideally with the information about the workshop, conference or fair. Ensure that your information is provided in as many ways as possible.
- If you know of a patient, client or member who will be bringing a support person, you may consider informing them directly as well.

Module 5: Training

Step 1: Determine who must be trained

The Accessibility Standards for Customer Service specifies that all staff, volunteers, contractors or anyone else who interacts with your clients, patients or members on your behalf, as well as those involved in developing your patient or client service policies, practices or procedures, must be trained. This means that professionals and/or managers in your practice, clinic, association or college will need to be trained as well as most or all of your staff.

Practical Tips and Examples to Help You Complete this Step:

- Generally, the professionals and/or managers in your practice, clinic, lab, association or college have input into, or even develop on their own, your policies, practice and procedures around healthcare and around patient, client or member services.
- Therefore, they would need to be trained
- Think about any volunteers or contract employees that you use, even if you use them only one day of the year e.g. for a flu shot clinic, or a wellness/health fair. These people will also require some training.

Step 2: Determine the content of your training

Under the Accessibility Standards for Customer Service, training must include:

- The purpose of the Accessibility for Ontarians with Disabilities Act
- How to interact and communicate with persons with various types of disabilities
- How to interact with persons with disabilities who use an assistive device, or require the assistance of a service animal or a support person
- How to use equipment made available by your organization to help people with disabilities to access your goods and services
- What to do if a person with a disability is having difficulty accessing your organization's goods and services

Practical Tips and Tools to Help You Complete this Step

Even if most or all of the interactions of some of your employees with members, patients or clients is over the phone or by email, they should still be given training because they will need to understand that even virtual communication must be accessible.

For example, if they are attempting to phone someone with a hearing disability, staff may need to learn about the Bell Relay system or they may need to access a TTY (a telephone system which transmits telephone messages through texting). If they are sending an attachment along with an email to someone with a vision disability who uses screen reader technology, they will need to know that the attachment will have to be in an “accessible word format”. This means producing a word document with as little formatting as possible and describing any diagrams or charts in the document, rather than including the diagrams or charts.

If they are sending an attachment along with an email to someone with a vision disability who uses screen reader technology, they will need to know that the attachment will have to be in what is called “accessible word format”, this means producing a word document with as little formatting as possible, and describing any diagrams or charts in the document, rather than including the diagrams or charts.

Under this regulation, you and your employees are not required to know how to use every assistive device that a patient, client or member might bring to your practice, clinic, lab, association or college. However, you may want to ask the patient, client or member if there is anything you should know in case of an emergency.

The last requirement means that you have to be sure that your employees are trained in the accessibility policies, practices and procedures of your practice, clinic, health centre, lab, association or college.

Step 3: Decide on a training format that meets the needs of the people being trained

Many small organizations find it difficult to send staff away for in-person training or even to bring all the staff together in the office at the same time to do in-person training. E-learning that can be done at each employee's convenience often works better.

The optional *People Access* e-learning training meets the legal requirements of Accessibility Standards for Customer Service, Ontario Regulations 429/09, made under the Accessibility for Ontarians with Disabilities Act, 2005 and has been tailored through comments provided by health care associations and regulatory colleges to meet the needs of healthcare providers.

Content of the Training

- The purpose of the Accessibility for Ontarians with Disabilities Act
- Which disabilities are covered by the Act
- How to interact and communicate with people who have disabilities
- Which assistive devices and service animals are used by people with disabilities
- A template to help identify assistive devices available on your premises and where to learn how to use these devices
- A template to help your employees know what to do if a person with a particular type of disability is having difficulty accessing your services. This template will refer back to your policies, practices and procedures.

If you are interested in learning more about this low-cost option, please contact *People Access* by email at info@peopleaccess.ca or by calling us at 1-800-263-9648 ext. 224.

Alternatively, if you are interested in developing your own training course, you can access several training resources created by the Ontario government by going to www.AccessON.ca . You can also access the government's generic e-learning course called ServAbility at www.mcass.ca.

Step 4: Determine the timing of your training

To meet the compliance deadline of January 1, 2012, you must have all current employees, contractors and volunteers who interact with your patients, clients or members and all professionals or managers who contribute to the development of policies practices and procedures, trained by January 1, 2012.

However, you should also think about scheduling training whenever changes are made to your policies, practices and procedures on serving customers with disabilities. Also, when a new person is hired, they must be trained as soon as possible.

Step 5: Document your training

If you have 20 or more employees, you must keep a record of all employees trained, when they were trained, and what method was used. You should also have documentation of your policies around training including the details of what will be covered in the training and the time frame within which new employees will be trained.

Module 6: Documentation

Step 1: Document all policies, practices and procedures:

All clinics, private practices, wellness centres, associations and regulatory colleges with 20 or more employees will be required to document their policies, practices and procedures around:

- Providing accessible customer service to people with disabilities
- Allowing the use of personal assistive devices and making other assistive measures available
- Allowing service animals and support persons
- Steps to take with a temporary disruption to services or facilities used by customers with disabilities to access your services
- A description of your training policy, including a summary of training content and details about when training will be provided
- A description of the process for receiving and responding to feedback, including what action will be taken on any complaints.

Step 2: Notify patients, clients or members that these documents are available:

Organizations with 20 or more employees will also need to notify customers that these documents are available upon request. This requirement can be met by posting a notice on your website, in your reception area, or in regular communications to your clients, patients or members.

Practical Tips and Examples to Help you complete this step:

Please remember that the notices and the documents must all be available in formats that take into account your patient's, client's or member's disability. You are not required to anticipate the format required, but must respond if the person asks for the document in another format. You can negotiate this format.

For example, if a person with a vision disability requests the document in braille and wants it in a few days, but your braille provider cannot provide the document for two weeks, you may want to ask if the patient, client or member could access it if you provided it in an accessible electronic format, or if you provide it on an audio tape.

Sometimes, people are really only interested in a small portion of the document. Discovering this could enable you to provide a braille version of part of the document in a few days, as requested.

If the person does not agree to these options, you would then proceed to provide the document in braille in as short a time as possible.

Step 3: File an electronic report.

Clinics, private practices, associations and regulatory colleges with 20 or more employees, like all employers across Ontario with 20 or more employees, are required to file an online electronic report with the Government of Ontario regarding their compliance with the standard.

Clinics, private practices, associations, and regulatory colleges with fewer than 20 employees are exempt from filing reports, but must still meet the requirements of the standards. If you have fewer than 20 employees, but want to file a report, the Ontario Government will accept an official filing from smaller organizations. You can visit www.Ontario.ca/AccessON to learn more about accessibility reporting.

Practical Tips and Examples to Help You Complete this Step

- If you have 20 or more employees, the government has, or will send you instructions on how to complete this form
- On the next two pages, you will find a reproduction of the government on-line report. You may want to answer the questions to confirm compliance with the Accessibility Standards for Customer Service.
- However, please note that this is a practice run only. If you are required to report because you have 20 or more employees, you must follow the steps specified by the government of Ontario, or you will be found out of compliance.

For employers with 20 or more employees, these compliance questions on AODA Customer Service Standards must be completed.

1. a) Does your organization have policies, practices and procedures on providing goods or services to people with disabilities?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
1. b) Does your organization use reasonable efforts to ensure that these policies are consistent with the principles of independence, dignity, integration and equality of opportunity?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
2. Do your organization's policies address the use of assistive devices by people with disabilities in accessing your organization's goods or services, or any available alternative measures that enable them to do so?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
3. Do your organization's policies, practices and procedures require your organization to take a person's disability into account when communicating with the person?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
5. a) Does your organization permit people with disabilities to keep their service animals with them on the parts of your premises that are open to the public or other third parties, except where the animal is excluded by law, and is this included in your policies, practices and procedures?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
5. b) If a service animal is excluded by law from your premises, does your organization ensure that alternate measures are available to enable the person to access your goods or services?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
6. Does your organization permit people with disabilities to enter the parts of your premises that are open to the public or other third parties with their support person, and provide notice of any fee charged for the support person, and is this included in your policies, practices and procedures?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
7. Does your organization post a notice at a conspicuous place on your premises, on your website, or by another reasonable method, of any temporary disruption in facilities or services that people with disabilities usually use to access your organization's goods or services, including the reason, duration and any alternatives available?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
8. Has your organization established and documented a process to receive and respond to feedback on how its goods or services are provided to people with disabilities, including actions that your organization will take when a complaint is received?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

9. Does your organization make information about its feedback process readily available to the public, including how feedback may be provided?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
10. Does your organization ensure that the following people receive training about providing your goods or services to people with disabilities: <ul style="list-style-type: none"> ▪ every person who deals with the public or other third parties on behalf of your organization, and ▪ every person who participates in developing your organization's policies, practices and procedures on providing goods or services? 	Yes <input type="checkbox"/>	No <input type="checkbox"/>
11. Does this training include your organization's current policies, practices and procedures required under the Customer Service Standard and all the topics listed in section 6(2) of the standard?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
12. Does your organization have a written training policy that includes a summary of the contents of the training and details of when the training is to be provided, and does your organization keep records of the dates that training was provided and how many people were trained?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
13. Does your organization post a notice at a conspicuous place on your premises, on your website, or by another reasonable method, that the documents required by the Customer Service Standard are available upon request, and do you provide those documents in a format that takes a person's disability into account?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

I confirm that _____ has completed the
name of organization

activities as indicated above.

Authorized signature _____ Date _____

Name _____ Position _____

ABOUT PEOPLE ACCESS

People Access is a division of Excellence Canada. Our team of dedicated and experienced professional trainers and consultants is here to help your organization plan and implement the legislated AODA standards (Accessibility for Ontarians with Disabilities Act, 2005). We have been an EnAbling Change partner of the Ontario Government since 2009.

Visit www.peopleaccess.ca for a one-stop source of products, services, resources, and free tools to help you meet upcoming compliance deadlines. With over 350 train-the-trainer sessions performed at more than 200 organizations in the past 3 years, our professional staff has the know-how to save you time and money.

OUR VISION

A Canadian society that is diverse, accessible, and inclusive.

EXCELLENCE CANADA - ONTARIO ACCESSIBILITY AWARD

The *Excellence Canada - Ontario Accessibility Award* recognizes organizations that demonstrate a commitment to providing outstanding customer service to people with disabilities. Award recipients have gone above and beyond compliance with the Accessibility for Ontarians with Disabilities Act by removing barriers and promoting accessibility in their organizations and the community. The Honourable David C. Onley, Lieutenant Governor of Ontario, is the honorary patron of the *Excellence Canada - Ontario Accessibility Award Program*. Entire communities benefit by being more accessible, as local tourism and economic growth are stimulated.

Since 1984, *Excellence Canada* has served as the proud custodian to one of Canada's highest organizational achievements, the prestigious *Canada Awards for Excellence*, which enjoys the Vice-Regal Patronage of His Excellency, The Right Honourable David Johnston, C.C., C.M.M., C.O.M., C.D., Governor General of Canada. In this spirit, the new *Excellence Canada - Ontario Accessibility Award* highlights role models, while inspiring others to take positive action that benefits people with disabilities.

For further information, please contact us at:

People Access – Toll Free: 1 800 263 9648 Ext: 224
Email: info@peopleaccess.ca - www.peopleaccess.ca

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APPENDIX:

Materials to be given to employees to accompany the
People Access e-Learning course

1. Accessibility Equipment or Assistive Devices
2. Resources and Feedback Instructions
3. Customer Feedback Form
4. Notice of Service Disruption
5. Customer Service Accessibility Policy

Resources and Feedback Instructions

Accessibility Contact Information:

For any concerns or questions about accessibility in our organization, your main contact person is:

Name	Phone	email
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When in doubt, simply ask the customer “How may I help you?” and he or she will be pleased to explain what kind of help they require, if any.

Customer Service Feedback:

The following is our process for collecting and responding to Customer Feedback.

- Provide the customer with a Feedback Form upon request, ensuring that it is in a format that is acceptable to him or her.
- If required, assist the customer in completing the Feedback Form and give it to your Accessibility Contact.
- If the customer wishes to provide their comments in writing through email, provide him or her with the following email address: _____
- If the customer wishes to give verbal feedback, provide him or her with the following name and phone number: _____
- Advise that customer that the Accessibility Contact will respond to their feedback within _____ days.

Customer Feedback Form Template

Customer Feedback	
We welcome your feedback on the goods and services we provide. Please provide your comments below:	
If you would like to receive a follow-up from us about how we will respond to your feedback, please provide information about how we may reply:	
By email? E-mail address _____	
By phone? Phone # _____	
In writing? Address _____	
In person? Preferred arrangement _____	
Date: _____	Feedback received by: _____
Please contact us with any further information:[Your organization's information)	
Call: _____	
Email: _____	
Fax: _____	
In writing: _____ _____	
This feedback is collected under the Accessibility for Ontarians with Disabilities Act (AODA) Accessibility Standards for Customer Service. Feedback is responded to by using the following process: <i>[Describe Process Here]</i>	
Thank you for taking the time to provide us with feedback on our services.	

NOTICE of **SERVICE DISRUPTION**

The estimated length of the temporary disruption is from _____ to _____

The following services and/or facilities are currently unavailable:

_____ due to _____

_____ due to _____

The following alternative services and/or facilities are available:

[insert alternative service or facility name and location]

Thank you for your patience in this matter.

For questions or additional information please contact:

Name:

[insert department manager or supervisory staff person's name]

Phone: _____

Fax : _____

Email: _____

Customer Service Accessibility Policy

(the “Organization”)

NAME OF YOUR PRACTICE, CLINIC, ASSOCIATION OR COLLEGE

Purpose and Application

Under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*, all organizations must meet the requirements of accessibility standards established by regulation. This policy establishes the accessibility standards for customer service for our Organization, in accordance with Ontario Regulation 429/07. This policy applies to all your employees, agents, volunteers and contracted service staff of the Organization.

Definitions

Accessible means customer service is provided in a manner that is capable of being easily understood or appreciated; easy to get at; capable of being reached, or entered; obtainable.

Assistive Device means any device or mechanism that assists a person with a disability in accessing, and benefiting from the services provided. Assistive devices may include, but are not limited to; American Sign Language (ASL) interpretation, wheelchair, walker, cane, assistive listening device, visual alarms, or assistive software programs.

Disability means:

- a) 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 impairment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal, or on a wheelchair or other remedial appliance or device,
- b) A condition of mental impairment or a developmental disability,
- c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) A mental disorder,
- e) An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Guide Dog means a dog trained as a guide for a blind person and having the qualifications prescribed by the Blind Persons’ Rights Act R.S.O. 1990, c. B.7, s. 1 (1).

Service animal is an animal that provides assistance for a person with a disability. It may be readily apparent that the animal is used by the person for reasons relating to his/her disability; or a person may be asked to provide a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability

Policy Statement

Goods and services will be provided in a manner that respects the dignity and independence of all customers. The provision of services to persons with disabilities will be integrated wherever possible. Persons with disabilities will be given an opportunity equal to that given to others, to obtain, use or benefit from the goods and services provided by and on behalf of the Organization.

Policy Requirements

1) Use of Service Animals and Support Persons

- a. If a person with a disability is accompanied by a guide dog or other service animal, the Organization will ensure that the person is permitted to enter any facility with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law. Where a service animal is excluded by law, the Organization will ensure that other measures are available to enable the person with a disability to obtain, use and benefit from the Organization's goods and services.
- b. If a person with a disability is accompanied by a support person, the Organization will ensure that both persons are permitted to enter any facility, and that the person with a disability is not prevented from having access to the support person. Where and if a fee is charged for the support person, prior notice of the fee will be made available.

2) Notice of Temporary Disruptions

The Organization will provide notice of temporary disruptions. The notice will include information about the reason for the disruption, its anticipated duration, and a description of any available, alternative services. Notice will be made conspicuous and may be displayed at the location of the disruption, on the website, in a mailing or another reasonable method.

3) Accessibility Training Policy

- a. Training will be provided to every person dealing with members of the public, or who participates in developing the Organization's policies, practices, and procedures governing the provision of goods and services to the public. This includes employees, volunteers, agents, contractors, and others who provide service on behalf of the Organization.
- b. The training includes the following information
 - i. The purpose of the Accessibility for Ontarians with Disabilities Act
 - ii. How to interact and communicate with persons with various types of disabilities
 - iii. How to interact with persons with disabilities who use an assistive device, or require the assistance of a service animal or support person

iv. How to use equipment made available by the Organization to help people with disabilities access goods and services

v. What to do if a person with a disability is having difficulty accessing the Organization's goods and services

c. Training will be provided to each person according to his or her needs and duties and as soon as is practicable after he or she is assigned the applicable duties. Training will be provided on an ongoing basis in connection with changes to policies, practices and procedures governing the provision of goods or services to persons with disabilities. A record of the dates on which training is provided and the number of individuals to whom it is provided will be kept.

4) Feedback process

a. The Organization employs a feedback process through which people with disabilities are encouraged to provide information and feedback about the goods and services they receive. Feedback can be received in ways appropriate to the person's disabilities and includes in person, by mail, or email, by telephone, fax or other methods.

b. The feedback process is promoted on the website and through other printed outreach methods. A copy of the feedback process and feedback form is available upon request.

5) Notice of availability of documents

The Organization will provide the public notice of the availability of the documents required by the Accessibility Standards for Customer Service, (O. Reg 429/07) upon request. Notice of availability will be provided on the web site and through other printed methods.

6) Format of documents

If the Organization is required, by the Accessibility for Ontarians with Disabilities Act, 2005, to give a copy of a document to a person with a disability, the Organization will take into account the person's ability to access the information and will provide the document or information contained in the document in a format that meets those needs as agreed upon with the person.