MEMORANDUM

TO: Members of Committee of the Whole

Members of The Regional Municipality of York Police Services Board

FROM: Regional Councillor Vito Spatafora, Chair

York Region Accessibility Advisory Committee

DATE: October 18, 2013

RE: Accessibility (Compliance) Report on the Accessibility for Ontarians with

Disabilities Act, 2005 (AODA)

As Chair of the York Region Accessibility Advisory Committee (YRAAC), I submit the following report on the Committee's review of the Accessibility (Compliance) Report on the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

As legislated under the AODA (Section 29.4), municipal accessibility advisory committees have the role to advise municipal councils on the requirements and implementation of the Province's accessibility standards and compliance reports. The YRAAC is responsible for fulfilling this function for York Region, including York Regional Police and Police Services Board.

The AODA requires designated organizations to file reports that document compliance with the requirements of the legislation. The first accessibility report was filed in March 2010 regarding the Region's compliance with the Accessibility Standards for Customer Service Regulation under the AODA. The next report is due by December 31, 2013, and every two years thereafter.

The actions completed to achieve compliance with enacted requirements of the AODA to July 1, 2013 are documented (*Attachments 1 and 2*). The Accessibility (Compliance) Report questions mirror those on the Province's online accessibility report. York Region, York Regional Police and Police Services Board will submit one combined accessibility report to the Province by the deadline.

As part of the Committee's proceedings at their meeting of September 25, 2013, the YRAAC advised on the draft Accessibility (Compliance) Report on the AODA for York

Region, York Regional Police and Police Services Board. The Committee's feedback was recorded (*Attachment 3*) and the Report was revised as appropriate.

On behalf of the YRAAC, I confirm that the YRAAC has advised, monitored and assessed the draft Accessibility (Compliance) Report, as required by legislation.

Regional Councillor Vyo Spatafora, Chair

York Region Accessibility Advisory Committee

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Attachments (3) Accessibility (Compliance) Report on the *Accessibility for Ontarians with Disabilities Act*, 2005 (AODA) – The Regional Municipality of York

Accessibility (Compliance) Report on the *Accessibility for Ontarians with Disabilities Act*, 2005 (AODA) – York Regional Police and The Regional Municipality of York Police Services Board

Draft Accessibility (Compliance) Report Review – Summary of Feedback Offered by the York Region Accessibility Advisory Committee

Copy to: York Region Accessibility Advisory Committee

Chief Eric Jolliffe, York Regional Police

Mafalda Avellino, Executive Director, The Regional Municipality of York Police Services Board

Joy Hulton, Regional Solicitor

Adelina Urbanski, Commissioner, Community and Health Services

Lisa Gonsalves, Director, Strategies and Partnerships Branch, Community and Health Services

ATTACHMENT 1

Accessibility Report on the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) Compliance with Requirements to December 31, 2013 The Regional Municipality of York

July 1, 2013

DRAFT

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
Customer Service	1. Is your organization complying with the requirements of the Customer Service Standard and are you implementing the Customer Service training policy by continuing to train staff on an ongoing basis? [ASCR s.6]	Providing accessible customer service is one of York Region's core accessibility principles. York Region is committed to providing its goods and services in ways that respect the dignity and independence of people with disabilities, allowing them to benefit from the same services, in the same places and in a similar way as other customers. [Accessibility Policy: Customer Service P3] York Region continues to meet compliance with the Accessibility Standards for Customer Service (Ontario Regulation 429/07) (ASCR). The Accessible Customer Service Policy was approved by Council in November 2009 as a requirement of the Regulation. It outlines the policies, practices and procedures to offer accessible customer service to customers with disabilities and meet the legislated requirements. As directed by the Policy, when serving customers with disabilities, York Region employees, volunteers and agents working on our behalf:	Completed
		 Communicate with customers in a way that takes into account the person's disability Allow customers to use their own personal assistive devices, or those which may be offered by York Region, while accessing our services. Allow customers to be accompanied by a service animal in those areas of our facilities that are open to the public, unless excluded by law. If not permitted, provide service in an alternate way. Allow customers who use a support person to bring that support person with them when accessing services in our facilities. Provide advance notice of any applicable fees charged for the support person of a customer with a disability. Provide prompt notice when York Region facilities or services used by customers with disabilities are temporarily disrupted. Train all staff, volunteers and agents who provide direct service to members of the public on our behalf about how to serve customers with various types of disabilities. Receive and respond to feedback from the public about the way we provide service to people with disabilities in 	
		 accordance with the Customer Service Strategy. Offer copies of specific documents about accessible customer service upon request, and in other formats if needed. 	

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
		[Accessible Customer Service Policy P5-11] The legislation requires training for those who deal with the public. York Region chose to enhance its already high standards of customer care by requiring all Regional employees to receive Accessible Customer Service Training, regardless of their level of contact with the public. York Region developed its own Accessible Customer Service Training program. The thirty minute video includes a review of the purpose of the <i>Accessibility for Ontarians with Disabilities Act, 2005 (AODA)</i> as well as the requirements of the Accessibility Standards for Customer Service (Ontario Regulation 429/07) and teaches about the following matters: • How to interact and talk to persons with various types of disabilities. • How to interact with persons with disabilities who use an assistive device or need the help of a service animal or a support person. • How to use equipment or assistive devices available on York Region premises, and • What to do if a person with a particular type of disability is having a hard time accessing our goods or services. The Accessible Customer Service Training is given to each person as soon as possible after he or she is assigned their applicable duties. New hires receive this training through the required Customer Service Core Competency Workshop offered through Corporate Services Department (Corporate Learning). Training records for employees are maintained through the Learning Management System. Service providers who provide direct service to the public, or interface with the public, on York Region's behalf must also receive Accessible Customer Service Training. If required, the Accessible Customer Service Training clause is added to a supplier's contract, with an AODA Training Certificate that must be completed and submitted to the department by the service provider. As of January 1, 2012 the Regulation applies to all organizations (public, private and non-profit) that provide goods or services either directly to the public or to other organizati	_
		Though it is legislated, Ontario bidders may not be compliant with the training requirements of the Regulation. As a matter of due diligence, York Region continues to include the Accessible Customer Service Training clause and AODA Certificate to contracts of identified service providers.	

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
General	2. Does your organization have written accessibility policies and a statement of commitment? [IASR s.3]	York Regional Council endorsed the corporate Accessibility Policy on November 15, 2012. The policy is an overarching policy for the requirements of all accessibility standards developed under the AODA, including the corporate Accessible Customer Service Policy which until then was a stand-alone policy. [Accessibility Policy P1-7] The Accessibility Policy includes a statement of organizational commitment to meet the needs of people with disabilities in a timely manner, as follows: "The Regional Municipality of York is committed to meeting the accessibility needs of people with disabilities in a timely and proactive manner and will use reasonable efforts to provide equitable access to Regional programs, goods, services and facilities in a way that respects a person's dignity and independence." [Accessibility Policy: Policy Statement P1] The content of the policy is in compliance with the requirements of the IASR and was developed using inter-jurisdictional best practice examples, the Province's compliance guidelines, the Region's strategic directions and priorities, and in consultation with the lead departments for each standard, the ODA/AODA Staff Committee and the York Region Accessibility Advisory Committee. The overarching format of the policy establishes the Region's core accessibility principles, while allowing for the ongoing development of specific practices and procedures to achieve compliance with requirements of the Regulation over time. Guided by the accessibility principles of the Accessibility Policy, York Region: Provides accessible customer service Has a multi-year accessibility plan Ensures accessible customer service Has a multi-year accessibility plan Ensures accessible work environment Makes the way we communicate accessible to people with disabilities Makes websites and web content accessible to People with disabilities Makes buildings and public spaces accessible to everyone	Completed

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
		The Accessibility Policy applies to "all York Region Employees, Volunteers and Agents who provide goods, services or facilities on behalf of York Region, or who help develop policies for the organization." Each Regional department is responsible to ensure that its own policies, practices and procedures comply with those contained in this policy.	
		[Accessibility Policy: Application P1]	
		A comprehensive communications strategy continues to promote the Accessibility Policy practices and procedures to both Regional staff and the public. This strategy included a lead story in the CAO's monthly newsletter, lunch sessions for staff and <i>Accessibility News</i> employee newsletter articles. A scheduled annual review of policies across the corporation ensures alignment of departmental policies with the Accessibility Policy on an ongoing basis.	
	3. Has your organization established, implemented, maintained and posted a multi-year accessibility	Accessibility planning is one of York Region's core accessibility principles. As directed by the Accessibility Policy, York Region has established and continues to implement, maintain and document a <i>Multi-Year Accessibility Plan</i> (MYAP) in accordance with the AODA. The MYAP is posted to the Region's website and provided in accessible formats upon request.	Completed
	plan? [IASR s.4] and have transportation- specific accessibility planning requirements been identified? [IASR s.41-43]	[Accessibility Policy: Accessibility Planning P4] Multi-year accessibility planning replaces annual accessibility planning under the <i>Ontarians with Disabilities Act</i> , 2001 (ODA). Since 2003, York Region has executed eight accessibility plans and implemented over 750 accessibility planning actions to remove barriers for people with disabilities.	
	[IASK 5.41-43]	In 2003, Council approved the <i>York Region Accessibility Plan Policy Framework</i> to set the policy direction and provide tools for the development and monitoring of York Region's future accessibility plans under the ODA. To respond to multi-year accessibility planning requirements, the 2003 <i>York Region Accessibility Plan Policy Framework</i> was repealed by Regional Council and replaced by the new <i>Multi-Year Accessibility Plan Policy Framework</i> to reflect the legislated changes to accessibility planning under the AODA, while still also meeting the ODA requirements.	
		[Corporate Policies: Multi-Year Accessibility Plan Policy Framework]	
		York Region's 2013-2021 Multi-Year Accessibility Plan was adopted by Regional Council on June 27, 2013. It was developed under the new Framework and outlines York Region and York Regional Police's long-term accessibility strategy for the 2013 to 2021 time period. AODA requirements for 2011 and 2012 were included in the 2011/2012 Accessibility Plan. As required, York Region has completed AODA requirements to July 1, 2013, and, in some cases, is well ahead of compliance dates to 2017.	

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
		Consultation requirements were also met. The AODA requires that the Multi-Year Accessibility Plan is developed, reviewed and updated in consultation with persons with disabilities and an accessibility advisory committee. Feedback on the Region's Plan was collected from these groups through public meetings, focus groups, social media and an online survey and included in the final plan as appropriate.	
		In addition to multi-year accessibility planning, the AODA includes transportation accessibility planning requirements. Providing accessible transportation services is one of York Region's core accessibility principles. The following transportation-specific accessibility actions are included in the MYAP to meet the requirements of the IASR (s. 41-43):	
		[s.41] YRT/Viva has a process in place on receiving, managing and taking action on customer feedback. Customer feedback is received by YRT/Viva and Mobility Plus staff representatives, tracked in the complaint tracking system and forwarded to the appropriate functional area for investigation and resolution, and customer follow-up, where requested. Monthly reports summarize the number of complaints received and categorize them according to functional area. Customer feedback is used to identify opportunities for service improvement.	
		[s.42] To ensure people with disabilities using specialized transportation have greater access to services, YRT/Viva undertakes a demand analysis for Mobility Plus as part of the 5 year service plan. The current 5 year service plan will be updated in 2014. The plan includes ridership projections and measures to reduce wait times, including maintaining contractual obligations for on-time service delivery and providing same-day service.	
		[s.43] Measures to identify, prevent and address accessible equipment failures are documented in the contracts between YRT/Viva and the operating contractors. These include pre-trip, in-trip and post-trip inspections and regularly scheduled maintenance of vehicles.	
	4. Does your organization include accessibility design, criteria and features when procuring or	As a core accessibility principle, York Region includes accessibility design, criteria and features when procuring goods, services, facilities and self-service kiosks, if practicable. If it is not practicable to do so, staff will provide an explanation, upon request. This applies across all departments, including Housing York Inc., York Region Rapid Transit Corporation and York Regional Police.	Completed
	acquiring goods, services, facilities and self-service kiosks, if practicable? [IASR s.5 and s.6]	[Accessibility Policy: Procurement/Self-Service Kiosks P4] Procedures and tools were developed to meet the legislated requirements with minimal change to the current delegated authority and procurement practices. To ensure proposed processes were simple to use and effective, procurement-involved staff from across the corporation participated in a focus group to test and provide feedback before roll-out.	

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
		The <i>Accessibility Checklist</i> helps determine if accessibility design, criteria or features can be incorporated into a proposed product, service or facility. If it is not possible to do so, the form records the rationale, as the legislation requires organizations to provide an explanation upon request. The <i>Accessibility Checklist</i> is retained in the department's purchase file in the event of an audit or inquiry.	
		It is the responsibility of the originating department to conduct this review and to incorporate accessibility criteria in the specifications of the purchase, if practicable. Supplies and Services forms record that departments have worked through the accessibility process. If the accessibility section is not completed, forms are returned to departments.	
		Staff tools are posted in the Purchasing Toolkit on MyPortal. Resources include a step-by-step guide for purchases under \$10k, purchases under \$50k, purchases \$50k to \$100k, and purchases greater than \$100k, with accessibility incorporated at each level. Purchasing forms and related training were also updated to reflect the procurement requirements.	
		A comprehensive communications strategy continues to promote accessibility-related procurement practices and procedures to Regional staff. This strategy has included lunch sessions for staff, presentations to departmental teams and employee newsletter articles. It is also included in procurement training for Regional employees. Procedures and resources have been adapted for Housing York Inc., York Region Rapid Transit Corporation and York Regional Police.	
Information and Communications	5. Does your organization provide its emergency procedures, plans or public safety information that it	Providing accessible formats and communication supports is one of York Region's core accessibility principles. The Accessibility Policy directs Regional departments to provide or arrange for the provision of accessible formats or communication supports for people with disabilities, upon request. This includes emergency procedures, plans or public safety information that the Region makes available to the public.	Completed
	makes available to the public, in an accessible format upon request? [IASR s.13]	[Accessibility Policy: Accessible Formats and Communication Supports P4] To strengthen this long-standing service to customers and meet the requirements of the IASR (s.13) the following practices and tools are established:	
		Statement of Accommodation The statement of accommodation informs the public that accessible formats or communication supports are available upon request and how to make a request. Departments include the following statement on all emergency and public safety information produced for the public where possible:	
		Accessible formats or communication supports are available upon request	

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
		Contact: (non-personal email and phone number)	
		The contact information listed is department-specific, according to departmental customer service processes in place.	
		 Tools and Resources The tools needed to respond to requests for accessible formats or communication supports are available on the intranet for easy reference and downloading: Accessible Format/Communication Support Request Form for departments to fill out when a request is received for an accessible format or communication supports List of internal and external resources to help departments fulfil requests for accessible formats or communication supports Statement of Accommodation instructions Frequently Asked Questions for staff List of definitions of accessible formats and communication supports 	
		Responding to Requests for Accessible Formats or Communication Supports When fulfilling a request for an accessible format or communication support, departments: • Work with requestors in a timely manner that takes into account the person's accessibility needs due to disability • Fulfill the request at a cost that is no more than the regular cost charged to other persons • Maintain records of requests for accessible formats and communication supports and make those records available to Community and Health Services, upon request	
		The communication strategy to inform Regional staff of this service to customers included a memorandum to Departmental Emergency Management and Communications Managers, a payslip insert to all staff (in partnership with IASR Section 27) and an employee newsletter article.	
Employment	6. Does your organization provide individualized emergency response information for	Providing accessible employment is one of York Region's core accessibility principles. York Region creates an accessible work environment for all employees across the employment life cycle, in accordance with the requirements and timelines set out in the Employment Standards and existing requirements under the Ontario <i>Human Rights Code</i> to accommodate people with disabilities.	Completed
	employees that require it and does it review the information in	[Accessibility Policy: Employment P5] York Region provides emergency response information for employees with disabilities upon request. Emergency	

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
	accordance with the Employment Standard? [IASR s.27]	response information may include: • Developing an individualized emergency response plan to help an employee with a disability during an emergency • Providing emergency information to an employee in an accessible format	
		An employee with a permanent or temporary disability who may need help during an emergency can request an emergency response plan through a manager. The manager contacts Property Services and a work order is completed. Property Services then works with the employee to develop an individualized emergency response plan, unique to the employee's needs and work environment.	
		The onus is always on the employee to request the service and the employee does not need to disclose details of their medical condition or disability to their manager. Any information shared with Property Services remains confidential and will only be shared as appropriate and with the employee's signed consent.	
		Individualized emergency response plans will be reviewed and updated if the employee moves to a different location in the organization or if their accommodation needs change. It is the employee's responsibility to request a review of their plan and it is the manager's responsibility to contact Property Services to initiate a work order.	
		Direction for managers about providing emergency response information for employees with disabilities is posted in the Managers Tool Kit on MyPortal. A communication strategy to inform employees of the availability of this service included a pay advice insert, York Beat message, posters and intranet resources on MyPortal. It is also included with information communicated to new hires at induction.	
Transportation	7. Do you make current information about accessibility equipment available to the public	[s.34] People with disabilities using conventional and specialized transportation services have access to current information on accessibility equipment and features of their vehicles, routes and services. This information can be found in the "About Us" section on the website at yrt.ca and is available in accessible formats upon request.	Completed
	and do you have measures in place to accommodate those who rely on the equipment if it fails to work? [IASR s. 34 and s.35]	[s.35] If equipment on a vehicle is non-functioning and/or equivalent service cannot be provided as soon as practicable, the Region's conventional and specialized transportation services take the necessary steps to accommodate people with disabilities. In the event of an equipment failure, the operator will advise the passenger of the problem and arrangements will be made for a replacement vehicle to be sent if the next scheduled bus is more than 30 minutes behind. If the passenger is travelling using mobility equipment, appropriate measures will be taken to allow the passenger to transfer to the replacement vehicle safely.	
		Standard operating procedures are in place regarding non-functioning accessibility equipment. Vehicle checks for cleanliness, operation of accessible equipment and amenities are completed by operators before buses leave for service.	

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
		Contractors train operators on this process and a training document has been developed.	
	8. Do you meet the consultation requirements for accessible bus stops and shelters? [IASR s.78]	[s.78] YRT/Viva developed and implemented design criteria for the construction, renovation or replacement of bus stops and shelters in consultation with the York Region Accessibility Advisory Committee (YRAAC) and the public. Using the criteria, YRT/Viva continues to upgrade stops and terminals in order to increase accessibility, with over 75 per cent of YRT/Viva bus stops now accessible. YRT/Viva also ensures that there is a staff representative at every YRAAC meeting and provides updates and solicits feedback on transit related matters including the design of bus stops and facilities when required.	Completed
	9. Do the operators of your vehicles provide assistance to people with disabilities to board and deboard, and ensure the safe storage of their mobility aids and mobility assistive devices? [IASR s.44 and s.48]	 [s.44] YRT/Viva operators provide assistance to people with disabilities to board and deboard. People with disabilities using YRT/Viva have access to: Lifting devices, and ramps that deploy, upon request Adequate time to safely board, be secured and deboard transportation vehicles with assistance, upon request Assistance with the safe and careful storage of mobility aids or mobility assistive Ability to travel with a medical aid. As part of the training for new hires and the annual refresher training for all transit operators, YRT/Viva drivers are trained in the provision of boarding and deboarding assistance to people with disabilities. [s.48] Operators of YRT/Viva vehicles ensure the safe storage of their mobility aids and mobility assistive devices. The existing YRT/Viva fare structure ensures that people with disabilities are not charged a fee for the storage of a mobility aid or mobility assistive device. As part of the training for new hires and the annual refresher training for all transit operators, YRT/Viva drivers are trained on the safe and secure storage of mobility aids and mobility assistive devices used by people with disabilities. 	Completed
	10. If a person with a disability cannot use your conventional transportation services because of their disability, do you provide that person with an alternative accessible method of transportation? [IASR s.45]	[s.45] This section does not apply where specialized transportation services are provided by a transportation service provider.	N/A

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
	11. Does your organization ensure that people with disabilities are not charged more than people without disabilities, and do you provide accessible fare payment options? [IASR s.46 and s.66]	[s.46] Existing fare policy ensures that persons with disabilities are not charged a higher fare than the fare charged to a person without a disability. [s.66] YRT/Viva has a same fare structure for conventional and specialized transportation services to ensure people with disabilities using specialized transportation services are not charged a higher fare than those using conventional transportation in the same jurisdiction. Customers can pay by a variety of accessible fare payment options including tickets, passes, electronic fare payment card (PRESTO) and cash.	Completed
	12. Do your operators allow people with disabilities to board or deboard vehicles at the nearest safe location if a transit stop is not accessible and do your operators promptly report inaccessible stops or temporary barriers? [IASR s.47]	[s.47] If the bus stop is not accessible, people with disabilities using conventional transportation services are able to board or deboard a transportation vehicle at the closest available safe location, as agreed by the operator and the passenger, along the same transit route. Where a designated accessible bus stop is inaccessible, operators report the problem to transit control centre so that the barrier can be addressed in a timely manner.	Completed
	13. Do your vehicles provide clearly marked seating for people with disabilities and have you developed a communication strategy to inform the public about the purpose of the seating? [IASR s.49]	[s.49] People with disabilities using conventional transportation services have access to courtesy seating. All YRT/Viva vehicles have designated priority seating areas and courtesy seating areas closer to the driver. YRT/Viva developed the courtesy seating decal that is being used by the Ontario Public Transit Association (OPTA) as best practice. Information about the purpose of courtesy seating was communicated to the public using advertisements on the buses as well as information on the website at yrt.ca.	Completed
	14. Do your conventional transportation vehicles provide pre-boarding	[s.51] As a long-standing service to customers, passengers using conventional transportation have, on request, access to pre-boarding verbal announcements of the route, direction, destination or next major stop. If requested, operators announce the route and destination prior to the passenger boarding the bus. YRT/Viva expects to have automated pre-boarding announcements on all buses by Spring 2014, well in advance of the required compliance date.	Completed

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
	verbal (upon request) announcements and audible on-board verbal announcements of all destination points or available route stops? [IASR s.51.and s.52]	[s.52] Passengers using conventional transportation have access to automated audible announcements of all route stops while the vehicle is in service. Automated audible stop announcements are available on all YRT/Viva vehicles.	
	15. Do your new transportation vehicles meet the technical requirements outlined in the IASR that are intended to support the safe boarding, travel and deboarding of persons with disabilities? [IASR s.53 – s.61]	All YRT/Viva vehicles are equipped with: • [s.53] Grab bars, handholds, handrails or stanchions that are accessible from ground level. • [s.54] Vehicle flooring that is slip resistant and produces minimal glare. • [s.55] Two allocated mobility aid spaces. • [s.56] Accessible stop requests located throughout the vehicle. • [s.57] Adequate lighting at all passenger access doors. [s.58] All YRT/Viva vehicles display the route or direction of the transportation vehicle or its destination or next major stop, with destination signage consistently located, glare free, high contrast and visible to the passenger at boarding point. [s.59] All YRT/Viva vehicles are equipped with lifting devices or ramps and the appropriate safety features including: • ramps or lifting devices • colour strip that runs its full width marking the bottom edge and that is high-colour-contrasted with its background to assist with visual recognition • slip resistant surface • raised edges of sufficient height to prevent a mobility aid from rolling off the edge of the ramp during the boarding or de-boarding of passengers. [s.60] All YRT/Viva vehicles are equipped with steps that are uniform and outfitted with the appropriate safety features including steps that are marked by a colour strip that is high colour-contrasted and has a surface that is slip resistant and produces minimal glare.	Completed

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
		[s.61] All YRT/Viva vehicles are equipped with ramps that have a visual warning lamp indicator mounted on the exterior near the mobility aid accessible door and with an audible warning alarm. This includes vehicles purchased after January 1, 2013.	
	16. Does your specialized transportation service provide service to eligible visitors and, where space is available, do you allow companions and dependents to travel with people with disabilities? [IASR s.67 and s.74]	[s.67] Visitors with disabilities from other jurisdictions (who qualify in their own jurisdiction or who meet the services eligibility requirements) may travel on Mobility Plus (YRT/Viva's specialized transportation). [s.74] Support persons and dependents may travel on Mobility Plus with a person with a disability. When a Mobility Plus customer mentions they are bringing an attendant with them, schedulers will ensure that the trip is scheduled on a bus that can accommodate both passengers. If a bus is full, the schedulers will not schedule the trip on that bus.	Completed
	17. Does your specialized transportation service provide origin to destination services that take into account the abilities of passengers and facilitate connections between specialized services provided in adjacent municipalities (including determining accessible stops and drop off locations)? [IASR s.68 and s.69]	[s.68] Using the Family of Services, Mobility Plus provides a range of services that takes into account the abilities of its passengers and that accommodates their abilities. YRT's Family of Services includes conventional YRT, Viva Rapid Transit, community bus, Dial-a-Ride and Mobility Plus door-to-door services. [s.69] People with disabilities using specialized transportation services in adjacent municipalities are able to travel across jurisdictions. Passengers may book their trips by contacting Mobility Plus and transfer at one of the accessible locations. Accessible transfer locations are determined based on the availability of an indoor waiting area, accessible bathroom and access to a payphone. A list of locations is also available on the Mobility Plus section of the website at yrt.ca. An additional application process maybe required for Mobility Plus registrants to access neighbouring specialized services.	Completed

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
	18. If your specialized transportation service requires reservations, do you provide information about service delays to affected passengers in a manner agreed to by your organization and the passenger? [IASR s.73]	[s.73] Customers using Mobility Plus are notified by an agreed upon method, of any delay in service of greater than 30 minutes.	Completed
	19. Does your specialized transportation service provide, at a minimum, the same hours and days of service as your conventional transportation service? [IASR s.70]	[s.70] People with disabilities using Mobility Plus services have access to its services during the same hours and days of service as conventional transportation services.	Completed
	20. Has your organization implemented and documented its emergency preparedness and response policies for the safety of persons with disabilities and are these policies available to the public and provided in an accessible format upon request? [IASR s.37]	[s.37] Emergency response procedures are included in the operator training manual. An outline of emergency procedures is made available to the public through the YRT/Viva website and provided in an accessible format upon request.	Completed
	21. If a route or	[s.50] People with disabilities using YRT/Viva are provided an alternative accessible arrangement in the event of a	Completed

AODA Standard	Requirement	Corporate Activities	Status Requirements Completed/ Pending
	scheduled service is changed and the change is known in advance of the commencement of the trip, does your conventional transportation service make available alternate accessible arrangements to transfer people with disabilities to their route destination? [IASR s.50]	service disruption and the information regarding the disruption is provided in a manner that takes into account the person's disability. Alternate arrangements are provided by using one of the Family of Services which includes conventional YRT, Viva Rapid Transit, community bus, Dial-a-Ride and Mobility Plus door-to-door services. In the event of a service disruption that is known in advance, alternate accessible arrangements are provided and the information on the alternate arrangement is communicated publicly and in a manner that is accessible. These include, but not limited to, notices at the affected bus stops, notice on the website at yrt.ca, social media as well as updates on the telephone.	

ATTACHMENT 2

Accessibility Report on the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) Compliance with Requirements to December 31, 2013 York Regional Police and The Regional Municipality of York Police Services Board

July 1, 2013

DRAFT

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
Customer Service	1. Is your organization complying with the requirements of the Customer Service Standard and are you implementing the Customer Service training policy by continuing to train staff on an ongoing basis? [ACSR s.6]	YORK REGIONAL POLICE: Procedure AI-345, Accessibility for Ontarians with Disabilities Act, 2005 (AODA) states that "all York Regional Police members and volunteers will be trained in accordance with the prescribed regulations made under the AODA." New members of York Regional Police are automatically assigned Accessible Customer Service Training through the Canadian Police Knowledge Network (CPKN). This training consists of a PowerPoint presentation and the 30 minute video developed by the Regional Municipality of York. Training records are maintained by the Training and Education Bureau. Training for volunteers and summer students is conducted in class during orientation sessions. Training records for these groups are maintained by the departments responsible for conducting the training. POLICE SERVICES BOARD: Police Services Board members, the Executive Director and Administrative Assistant are trained in accordance with the prescribed regulations made under the AODA. New Board members receive the 30-minute training video developed by York Region which includes a review of the purpose of the AODA and the requirements of the Accessibility Standards for Customer Services. The Executive Director maintains a record of the training.	Completed
General	2. Does your organization have written accessibility policies and a statement of commitment? [IASR s.3]	YORK REGIONAL POLICE: Procedure AI-345 was revised to include the requirements of the IASR which include accessibility planning, procurement, websites and web content and employment. A section	Completed

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
		on how to request an individualized emergency workplace plan was also added to the procedure.	
		An organizational statement of commitment was added to the procedure which states, "York Regional Police is committed to meeting the accessibility needs of people with disabilities in a timely and proactive manner so that all people may have equitable access to programs, goods, services and facilities in a way that respects their dignity and independence."	
		POLICE SERVICES BOARD:	
		The Board amended the Accessible Customer Services Policy No. 04/09 in November 2009 to include the requirements of the Accessibility Standards for Customer Service.	
		The Board also adopted its Accessibility Policy No. 01/13 which is an overall policy which includes all accessibility standards developed under the AODA. This policy identifies how the Board achieves and maintains accessibility by meeting the requirements of the accessibility standards of the: • Accessibility for Ontarians with Disabilities Act, 2005 • Accessibility Standards for Customer Service, Ontario Regulation 429/07 • Integrated Accessibility Standards Regulation, Ontario Regulation 191/11, and • Future regulations as amended	
		This policy meets the compliance requirements of Ontario Regulation 191/11 under the AODA as required by January 1, 2013.	
		This policy also requires that the Chief of Police takes steps to ensure that York Regional Police policies, practices and procedures are compliant with the requirements of Ontario Regulation 191/11 under the <i>Accessibility for Ontarians with Disabilities Act</i> , 2005 as required by January 1, 2013.	
		The policy includes the following organizational Statement of Commitment: The Regional Municipality of York Police Services Board is committed to meeting the	

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
		accessibility needs of people with disabilities in a timely and proactive manner and will use reasonable effort to provide equitable access to programs, services and facilities in a way that respects a person's dignity and independence.	
	3. Has your organization established, implemented, maintained and posted a multi-year accessibility plan? [IASR s.4]	Procedure AI-345 states that "York Regional Police will establish, implement, maintain and document a multi-year accessibility plan in accordance with the AODA. The multi-year plan will outline the ways that York Regional Police will identify, prevent and remove barriers and meet the requirements of the standards developed under the AODA." York Region's Multi-Year Accessibility Plan outlines York Region and York Regional Police's accessibility planning strategy for 2013 to 2021. The development of the plan was in accordance with the Multi-Year Accessibility Plan Policy Framework. This plan is available on both the Region of York's website, www.york.ca , and the YRP website, www.york.ca , <a< td=""><td>Completed</td></a<>	Completed
		updated in consultation with persons with disabilities and an accessibility advisory committee. York Regional Police collected feedback about the Multi-Year Accessibility Plan from people with disabilities, the community and the York Region Accessibility Advisory Committee. POLICE SERVICES BOARD: The Board is governed by the Multi-Year Accessibility Plan as adopted by The Regional Municipality of York pursuant to the Board's Accessibility Policy No.01/13.	
	4. Does your organization include accessibility design, criteria and features when procuring or acquiring goods, services, facilities and self-service kiosks, if practicable? [IASR s.5 and s.6]	YORK REGIONAL POLICE: Under Section E Procurement, Procedure AI-345 states that "Whenever possible, York Regional Police will take into account accessibility features and criteria when procuring or acquiring goods, services, facilities and self-service kiosks. If it not practicable to do so, members will provide an explanation, upon request."	Completed

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
		The Purchasing Unit Bid Request Form and Quotation Summary Form were modified so that purchasers must indicate whether accessibility criteria have been incorporated into the bid and quote request. An accessibility checklist assists in identifying whether the "proposed purchase or acquisition could create barriers for people with disabilities, whether they are members of the public or York Regional Police employees."	
		The Accessibility Coordinator is listed as a contact person on both documents to assist with completion if required.	
		POLICE SERVICES BOARD:	
		 This section does not apply to the Board directly; however, it does apply to York Regional Police. The Police Services directs the Chief through its policy including the Accessibility Policy which directs the Chief to ensure that: All requirements of the ASCS, O. Reg. 429/07 under the AODA are met on an ongoing basis All requirements of the IASR, O. Reg. 191/11 under the AODA are met on an ongoing basis in accordance with the timelines set out in the regulation Policies, practices and procedures are aligned with all requirements of the IASR, O. Reg. 191/11 under the AODA Accessibility requirements related to the implementation of this policy are part of the annual budget and planning processes 	
Information and Communications	5. Does your organization provide its emergency procedures, plans or public safety information that it makes available to the public, in an accessible format upon request? [IASR s.13]	YORK REGIONAL POLICE: York Regional Police does not have an individual emergency plan. The responsibilities of the Police Service are captured within Regional and municipal emergency plans. It would therefore be the responsibility of the Region and municipalities to make those emergency plans available to the public in alternate formats upon request. York Regional Police uses a variety of methods to disseminate public safety information including media releases and interviews, and social networking sites such as Facebook and	Completed

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
		Twitter. Per Procedure AI-345, "When providing documents to a person with a disability, York Regional Police shall take into account the person's disability and provide the information accordingly. When not practicable to provide an alternate format, the unit/bureau responsible for providing the information shall provide an explanation and a summary of the document in an accessible format."	
		POLICE SERVICES BOARD:	
		The Board does not disseminate public safety information and does not have an individual emergency plan. The responsibilities of the Board are captured within Regional and municipal emergency plans. The Region and municipalities would make those emergency plans available to the public in alternate formats upon request. The Board does make information available to the public in accessible formats upon request.	
Employment	6. Does your organization provide individualized emergency response information for employees that require it and does it review the information in accordance with the Employment Standard? [IASR s.27]	YORK REGIONAL POLICE: Under Section F Workplace Emergency Response Information, Procedure AI-345 details the process that members with a disability may request individualized workplace emergency response information depending on their accommodation needs. The Health and Wellness Unit, Human Resources Bureau will contact members if they are aware of a member's disability and/or if a member is accommodated to discuss if they require an individualized plan. Members who have a disability that York Regional Police is not aware of can contact the Health and Wellness Unit, Human Resources Bureau to request that an individualized workplace emergency plan be developed for them. It is the responsibility of the Accessibility Coordinator to "liaise with the member that requires the individualized workplace emergency response information and the Health and Wellness Unit, Human Resources Bureau to review the member's needs and prepare the individualized workplace emergency response information as soon as practical."	Completed
		The formal civilian orientation program for new employees includes information about the availability of individualized emergency workplace plans upon request. Police officers must meet health and fitness standards that are set by the government prior to applying to be a police officer so a new hire would not require an individualized plan. Officers who require an	

AODA Standard	Requirement	Corporate	Status
		Activities	Requirements Completed/ Pending
		individualized plan due to illness/injury occurring after hiring would be notified by the Health and Wellness Unit, Human Resources Bureau.	
		Members were also notified of the ability to request an individualized workplace emergency plan through articles in two internal newsletters, the January 2012 issue of <i>The HR Gazette</i> , Vol. 1, Issue 2) and the June 2012 Health and Safety Bureau newsletter <i>SafetyNet</i> (Vol. 1, Issue 1).	
		POLICE SERVICES BOARD:	
		Board Members or new Board staff can request an individualized workplace emergency plan from the Health and Wellness Unit, Human Resources Bureau of York Regional Police. This is arranged through communication from the Board's Executive Director. It is the responsibility of the Executive Director to liaise with the individual that requires the individualized workplace emergency response information and it is the responsibility of the Health and Wellness Unit, Human Resources Bureau to review the member's needs and prepare the individualized workplace emergency response information as soon as practical.	

Accessibility (Compliance) Report on the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) York Region Accessibility Advisory Committee Consultation - Summary of Feedback September 25, 2013

Questions, Comments or Suggestions	Staff Recommendation/Response	Given the response, does the Accessibility (Compliance) Report need to be revised?
Overall Feedback		
Comment: The compliance reporting charts are well done.		No
training policy by continuing to train staff on an ong		ustomer Service
Accessible Customer Service Training?	Accessible Customer Service training is given to each person as soon as possible after he or she is assigned their applicable duties. New hires receive this training through the mandatory Customer Service Core Competency Workshop offered through Corporate Services Department. The group format of the workshop offers opportunity for discussion, with resource handouts for additional support. Accessible customer service training as it relates to an individual's job function is offered at the departmental level.	No
Is Accessible Customer Service Training required once or repeated on an ongoing, scheduled basis?	The Accessible Customer Service training module is one-time training, but some program areas elect to offer refresher courses as part of ongoing training for staff. In addition to the module, an ongoing educational strategy promotes accessible customer service tips, including articles in the <i>Accessibility News</i> newsletter for Regional employees. Accessible customer service training as it relates to an individual's job function is offered at the departmental level.	No
Does the Accessible Customer Service strategy include outreach to the community?	The Accessible Customer Service Training module is considered to be a best practice, with multiple requests from public, private and not-for-profit organizations to adapt for the training of staff within their organizations. Though the content is York Region-specific, the module is available for organizations to adapt, with credit to York Region and Rogers TV, with the understanding that the tool was developed to obtain compliance for York Region Staff. Other	No

Questions, Comments or Suggestions	Staff Recommendation/Response	Given the response, does the Accessibility (Compliance) Report need to be revised?
	organizations would need to supplement the training where necessary.	
Does the Accessible Customer Service Training provide advice on serving customers with different types of disabilities and how to offer appropriate assistance?	York Region strives to provide integrated customer service, allowing people with disabilities to benefit from the same services, in the same places and in a similar way to other customers. The Region's trademark accessibility phrase "How may I <i>best</i> help you" emphasizes a commitment to ask customers with disabilities how they would like to be assisted, without making assumptions. The Accessible Customer Service Training, Accessible Customer Service Policy and online resources for staff provide tips on serving customers with different types of disabilities.	No
, ,	policies and a statement of commitment? [IASR s.3]	
No comments or questions to report.		No
3. Has your organization established, implemented, specific accessibility planning requirements been in	maintained and posted a multi-year accessibility plan? [IASR s.4] and hentified? [IASR s.41-43]	ave transportation-
Regarding community consultation on the multi- year accessibility plan, how was the online survey promoted and what was the response rate?	 The online survey was one of several methods used to collect feedback from the community on the multi-year accessibility plan. Other methods included a focus group with disability organizations and consultation with the York Region Accessibility Advisory Committee. Five common questions were asked: Is the Multi-Year Accessibility Plan easy to read and follow? Does the Multi-Year Accessibility Plan provide the information you want to know? Are we moving in the right direction to meet the legislated requirements to make services more accessible? What do you see as being the most important when it comes to accessibility and why? Are there any actions missing in the Multi-Year Accessibility 	No

Questions, Comments or Suggestions	Staff Recommendation/Response	Given the response, does the Accessibility (Compliance) Report need to be revised?
Comment: Consider using traditional print media to promote future surveys. This may increase involvement of people who do not use social media or computers, particularly seniors.	Plan? Social media enhanced traditional promotional strategies. On a scheduled basis, a message on York Region's Twitter account announced that York Region's 2013-2021 Multi-Year Accessibility Plan was available for review and comment with a link to the survey on York.ca. The Region's Facebook account posted a similar message on a scheduled basis with a link to the survey on the website. To involve internal stakeholders, York Beat employee e-newsletter encouraged feedback from staff with a link to the survey on the website. The online survey was posted on www.york.ca from April 8 to 16, 2013. Nine online responses and one by email to AODA@york.ca were received and incorporated into the overall feedback data. Staff will take this suggestion into consideration when developing future community consultation surveys.	No
What methods were used to consult with the community on the transportation elements of the multi-year accessibility plan?	Feedback on the transportation elements of the multi-year accessibility plan was collected as part of the overall community consultation strategy which included focus groups, an online survey and social media (see above). In addition, YRT/Viva held a series of Public Information Centres on its proposed 2014 annual service plan in March/April 2013. Sessions were held in each of York Region's nine municipalities. High traffic locations were selected to enhance public engagement, including transit stations (Newmarket Go Bus Station and Richmond Hill	No

Questions, Comments or Suggestions	Staff Recommendation/Response	Given the response, does the Accessibility (Compliance) Report need to be revised?
	Centre Bus Terminal) and malls (Vaughan Mills Mall).	
	The purpose of the Public Information Centres was to inform the public and to get feedback on proposed route and service adjustments for 2014. The transportation elements of the multi-year accessibility plan were incorporated in this consultation process.	
Were residents who live in the north of York Region included in community consultations on the transportation elements of the multi-year accessibility plan?	YRT/Viva Public Information Centres were held in each of York Region's nine municipalities including the Town of East Gwillimbury (Sports Complex) and Town of Georgina (Ice Palace).	No
Does York Regional Police offer specialized training to officers on how best to work with someone with a communication disability such as a hearing disability or inability to speak?	York Regional Police officers are trained on procedures to work with people with different types of disabilities, including communication disabilities. For example, procedures are in place to enlist American Sign Language interpreters for clients with a hearing disability, upon request. The Police also partner with different disability organizations. A planned workshop with the York-Durham Aphasia Society would assist officers in communicating with individuals who have a communication disability due to a brain injury.	No
Does the York Regional Police fleet include an accessible vehicle to transport a person with a mobility disability?	The York Regional Police fleet includes an accessible van to transport a person with a disability. If a person requires medical assistance to transport, York Region EMS is enlisted to transport the person in an ambulance. If a person is being transported with a mobility device (such as a scooter or wheelchair) that cannot be accommodated in the ambulance, an agreement with York Region EMS and YRT/Viva allows the mobility device to picked up, transported and delivered to the person's home (in most cases) by a Mobility Plus vehicle.	No

Questions, Comments or Suggestions	Staff Recommendation/Response	Given the response, does the Accessibility (Compliance) Report need to be revised?
Does York Regional Police offer specialized training for officers to best work with someone with mental illness and is there outreach on these issues to the community?	York Regional Police have a mental health support team which are specially trained to respond to calls with someone with mental illness, as needed. The officer first on the scene determines if this special unit needs to come and assist with the call.	No
	York Regional Police also partners with York Support Services Network (310-COPE) to provide a mobile crisis response by a YSSN crisis worker and a York Regional Police officer to ensure that appropriate and timely police and support services are available in situations of distress or crisis.	
	The Community Service Bureau offers various outreach programs to the community on this and other subjects.	
Does York Regional Police network with other police services on accessibility best practices and issues?	York Regional Police networks with other police services across the Province. York Region and York Regional Police are also active members of the Ontario Network of Accessibility Professionals (ONAP) and the York Region Municipal Staff Reference Group (MSRG) which gather accessibility professionals from public sector organizations to share best practices and discuss accessibility issues.	No
4. Does your organization include accessibility desservice kiosks, if practicable? [IASR s.5 and s.6]	ign, criteria and features when procuring or acquiring goods, services, fa	cilities and self-
Regarding consultation on the proposed procurement process, who participated in the focus group?	Procurement-involved staff from across the corporation, York Regional Police, Housing York Inc. and York Region Rapid Transit Corporation were selected to participate in the procurement focus group. The selected staff either manage, process or directly produce bids for purchases and acquisitions and were best-suited to offer constructive feedback on the proposed procurement process.	No

Questions, Comments or Suggestions	Staff Recommendation/Response	Given the response, does the Accessibility (Compliance) Report need to be revised?		
	5. Does your organization provide its emergency procedures, plans or public safety information that it makes available to the public, in an			
accessible format upon request? [IASR s.13] No comments or questions to report.		No		
	nergency response information for employees that require it and does			
information in accordance with the Employment St.		it ieview the		
Emergency response information is provided for employees upon request, but should managers suggest this service for employees they identify as not knowing about or being able to request this service?	The legislation stipulates that the service is to be upon request. Employees will be aware of the availability of emergency response information from the various methods used to communicate the service to staff and have the opportunity to request accommodations in the workplace throughout the employment cycle. Managers can review employment and safety procedures with employees at any time, including the availability of emergency response information.	No		
Are general emergency procedures such as fire drills included in the new employee orientation program?	The New Employee Corporate Orientation (NECO) program provides information on the availability of individualized emergency response information, upon request. General workplace emergency response procedures such as fire drills are provided by managers according to workplace and duties, as appropriate.	No		
Apart from facility emergencies, are employees with medical conditions such diabetes or epilepsy able to request a medical emergency response plan for everyday work?	Individual Accommodation Plans (IAP) are developed for employees upon request, including IAPs for chronic or temporary medical conditions that may require an emergency response plan for everyday work. IAPs are reviewed or updated if an employee moves to a different location or if their accommodation needs change.	No		
7. Do you make current information about accessibility equipment available to the public and do you have measures in place to accommodate				
• • • •	those who rely on the equipment if it fails to work? [IASR s. 34 and s.35]			
No comments or questions to report.		No		
8. Do you meet the consultation requirements for accessible bus stops and shelters? [IASR s.78]				

Questions, Comments or Suggestions	Staff Recommendation/Response	Given the response, does the Accessibility (Compliance) Report need to be revised?	
No comments or questions to report.		No	
9. Do the operators of your vehicles provide assista mobility aids and mobility assistive devices? [IASR	nce to people with disabilities to board and deboard, and ensure the sattle sat	afe storage of their	
In addition to YRT/Viva drivers, are contracted drivers trained in the provision safe boarding and storage of mobility devices?	Contracted drivers receive training in the provision safe boarding and deboarding assistance to people with disabilities, and on the safe and secure storage of mobility aids and mobility assistive devices.	No	
10. If a person with a disability cannot use your conventional transportation services because of their disability, do you provide that person with an alternative accessible method of transportation? [IASR s.45]			
N/A: This section does not apply where specialized transportation services are provided by a transportation service provider.		No	
11. Does your organization ensure that people with disabilities are not charged more than people without disabilities, and do you provide accessible fare payment options? [IASR s.46 and s.66]			
No comments or questions to report.		No	
12. Do your operators allow people with disabilities to board or deboard vehicles at the nearest safe location if a transit stop is not accessible and do your operators promptly report inaccessible stops or temporary barriers? [IASR s.47]			
No comments or questions to report.		No	

Questions, Comments or Suggestions	Staff Recommendation/Response	Given the response, does the Accessibility (Compliance) Report need to be revised?	
13. Do your vehicles provide clearly marked seating for people with disabilities and have you developed a communication strategy to inform the public about the purpose of the seating? [IASR s.49]			
Will the Metrolinx access pass program be implemented in Mobility Plus subcontracted vehicles?	Metrolinx is developing a paratransit plan for the Presto Card. Mobility Plus staff and other Metrolinx stakeholders are working together to advise Metrolinx on an effective solution.	No	
14. Do your conventional transportation vehicles provide pre-boarding verbal (upon request) announcements and audible on-board verbal announcements of all destination points or available route stops? [IASR s.51.and s.52]			
No comments or questions to report.		No	
15. Do your new transportation vehicles meet the technical requirements outlined in the IASR that are intended to support the safe boarding, travel and deboarding of persons with disabilities? [IASR s.53 – s.61]			
No comments or questions to report.		No	
16. Does your specialized transportation service provide service to eligible visitors and, where space is available, do you allow companions and dependents to travel with people with disabilities? [IASR s.67 and s.74]			
Do companions and dependents travel at no charge?	Support persons and dependents may travel on Mobility Plus with a person with a disability at no extra charge.	No	
17. Does your specialized transportation service provide origin to destination services that take into account the abilities of passengers and facilitate connections between specialized services provided in adjacent municipalities (including determining accessible stops and drop off locations)? [IASR s.68 and s.69]			
No comments or questions to report.		No	

Questions, Comments or Suggestions	Staff Recommendation/Response	Given the response, does the Accessibility (Compliance) Report need to be revised?	
18. If your specialized transportation service requires reservations, do you provide information about service delays to affected passengers in a manner agreed to by your organization and the passenger? [IASR s.73]			
No comments or questions to report.		No	
19. Does your specialized transportation service provide, at a minimum, the same hours and days of service as your conventional transportation service? [IASR s.70]			
No comments or questions to report.		No	
20. Has your organization implemented and documented its emergency preparedness and response policies for the safety of persons with disabilities and are these policies available to the public and provided in an accessible format upon request? [IASR s.37]			
No comments or questions to report.		No	
21. If a route or scheduled service is changed and the change is known in advance of the commencement of the trip, does your conventional transportation service make available alternate accessible arrangements to transfer people with disabilities to their route destination? [IASR s.50]			
No comments or questions to report.		No	