

Canadian Memorial Chiropractic College

ACCESSIBILITY STANDARDS COMPLIANCE PLAN

Last Update: August 2023

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Background

Canadian Memorial Chiropractic College (CMCC) has developed this Accessibility Standards Compliance Plan (Accessibility Plan) in response to the Government of Ontario's legislation: Accessibility for Ontarians with Disabilities Act, 2005 (AODA). The goal of this legislation is to make Ontario accessible for people with disabilities by 2025 through province-wide accessibility standards and to improve accessibility by identifying, breaking down and preventing barriers to accessibility.

In early 2010, CMCC established an AODA Team, later changed to the Accessibility Advisory Committee (AAC), mandated to develop an accessibility plan for CMCC in compliance with Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act, 2005

The mandate of the AAC was to review the rights and needs of persons with disabilities who attend CMCC and make recommendations to accommodate those needs.

The Committee was formed with broad internal stakeholder membership and was tasked with the following mandate:

- Promote accessibility at CMCC
- Promote sensitivity and awareness of the needs of persons with disabilities within the CMCC community
- Meet on an ongoing basis to review needs, to identify specific initiatives, to monitor progress toward established goals, and to oversee the development of future accessibility plans
- Consider the rights and needs of persons with disabilities in the development of institutional policy
- Recommend and review the cost related to managing an accessible institution.

In July 2010, CMCC approved the following policy statement:

CMCC will provide reasonable accommodation to people with limited abilities in a way that respects their dignity, independence, integration, and provides them with equal opportunity to access goods and services offered by CMCC.

CMCC's Accessibility Plan is an evolving document, established first in response to requirements for compliance with the first Regulation of the AODA, the Customer Service Standard, required by January 1, 2012.

The second regulation, Integrated Standards Regulation was established in 2011, with which CMCC was required to be in compliance commencing January 1, 2013 with completion by January 1, 2025. This Regulation covers the next three accessibility

standards: Information and Communications, Employment, and Transportation. The Transportation Standards do not apply to CMCC.

The Design of Public Spaces Standard (previously Accessible Built Environment Standard) was passed in the fall of 2013. For the most part, these standards do not apply to CMCC. However, there are some aspects of this standard that CMCC may want to review, should building changes arise.

In June 2016, the Ontario government introduced the revised Integrated Accessibility Standards Regulation, which consolidated all the accessibility standards. The standards of Customer Service, Information and Communications, Employment, Transportation, and the Design of Public Spaces now all fall under the Integrated Accessibility Standard Regulation.

In January 2019, the CMCC Executive Leadership Team (ELT) approved the creation of a new institutional committee to replace the Accessibility Advisory Committee. The new committee would have a similar focus although a broader mandate and would be called the Equity, Diversity and Inclusion Committee (EDI).

The scope of the EDI Committee is to strive to create a community at the Canadian Memorial Chiropractic College where students and employees feel acknowledged, respected and have a sense of belonging.

Similar to the ACC, the EDI Committee will advise and make recommendations on matters related to equity, diversity and inclusion at CMCC in order to maintain an environment free of discrimination and intolerance. The committee will meet on a quarterly basis.

This Accessibility Standards Compliance Plan will be updated as strategies are identified in order to ensure compliance with the standard which will then be documented within.

Consistent with the intent of legislation, CMCC has provided training to its employees on all applicable AODA standards, with further training to be developed and implemented as required.

Integrated Accessibility Standards Regulation - General Requirements

Under the Integrated Accessibility Standards Regulation (“The Integrated Standard”), CMCC is required to establish policies and procedures covering accessibility standards in **Customer Services, Information and Communications, Employment, Transportation, and Design of Public Spaces**. There is a phased-in approach to compliance, with different deadline dates for each standard that range between January 1, 2012 and January 1, 2025.

The Integrated Standards sets out a variety of **General Obligations** outside of the requirements of the five specific standards Customer Service, Information and Communications, Employment, Transportation, and the Design of Public Spaces). These General Obligations are listed as:

- Accessibility Policies and Commitment Statement
- Multi-Year Accessibility Plans
- Procurement
- Self-Service Kiosks
- Training

General Obligations:

Compliance Issue	Compliance Plan - Methods	Completion Date	Responsibility
Accessibility Policies Integrated Accessibility Standards (IAS) Regulation O. Reg. 191/11, s.3	CMCC approved its Accessibility policy on the Integrated Standard. The policy is posted online for access by employees, students, and the public and can be available in accessible formats upon request. A Commitment Statement on supporting accessibility initiatives as they relate to the Integrated Standard and achieving accessibility in a timely manner was posted on the public website.	Jan 31, 2013. Reviewed Aug 31, 2017, Aug 2023. Reviewed every year. Last revision Jan 2023.	Administration and Institutional Planning. Human Resources.

<p>Accessibility Plans</p> <p>IAS O Reg. 191/11, s. 4</p>	<p>The CMCC multi-year accessibility plan, outlining strategies to prevent and remove barriers and to meet requirements under the Integrated Standard has been added to the Compliance plan that was initially developed under the Customer Service standard. This plan will be updated as needed but no less than every 5 years.</p> <p>This revised plan is posted on the CMCC website and can be provided in an accessible format upon request.</p>	<p>Finalized Dec 23, 2013.</p> <p>Reviewed Nov 2018, Jan 2020, Aug 2023.</p>	<p>Administration and Institutional Planning.</p> <p>Human Resources.</p>
<p>Procurement</p> <p>IAS O Reg. 191/11, s. 5</p>	<p>Whenever possible CMCC has incorporated accessibility criteria into their processes for procuring or acquiring goods, services and/or facilities.</p> <p>Should it be deemed not practical to incorporate this criterion in its procurement process, CMCC will provide, upon request, an explanation of this determination.</p>	<p>Jan 1, 2013.</p> <p>Ongoing</p>	<p>Administration and Institutional Planning.</p> <p>Human Resources.</p>
<p>Self Service Kiosks</p> <p>IAS O Reg. 191/11, s. 6</p>	<p>Not applicable to CMCC.</p>		
<p>Training</p> <p>IAS O Reg. 191/11, s. 7</p>	<p>A learning module was developed and posted online via KIRO to assist all CMCC employees, and Clinic interns in their understanding of the</p>	<p>Jul 6, 2013.</p> <p>Updated 2017.</p> <p>Ongoing for new hires.</p>	<p>Administration and Institutional Planning.</p> <p>Human Resources.</p>

	<p>Integrated Standard and its requirements.</p> <p>Tracking of the training is being kept on KIRO and certificates are available for employee records.</p>		
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Integrated Accessibility Standards Regulation – Customer Service Standards

CMCC is required to establish policies and procedures with regard to providing goods and services to persons with disabilities. The Customer Service Standards apply to students, potential students, patients, customers, alumni and other visitors to CMCC’s facilities.

Compliance Date – January 1, 2012

Customer Service Standards:

Compliance Issue	Compliance Plan - Methods	Completion Date	Responsibility
Policy	CMCC approved its Accessibility Policy on Customer Service for Persons with Disabilities. The policy is posted on CMCC’s website for access by employees, students and the public.	Jul 22, 2020. Reviewed Aug 31, 2017, Aug 2023.	Administration and Institutional Planning.
Public Statement	A CMCC Statement regarding its support of the Accessibility initiative is posted on CMCC’s website.	Dec 2011.	Administration and Institutional Planning. Human Resources.
Education	A PowerPoint and Online educational module was developed to assist all CMCC employees, and Clinic Interns in completing their Customer Service Training. All CMCC employees, and Clinic Interns are required to complete the educational module.	Mar 2011. Dec 15, 2011.	Human Resources and Administration & Institutional Planning. Human Resources
Customer Service	Develop customer service procedures with respect to communication, assistive devices, service animals, and	Mar 8, 2011.	Clinic Management. Human Resources.

Procedures for CMCC Clinics	support persons while greeting and serving patients with disabilities through the clinic reception.	Reviewed and reposted in Feb 2018.	Administration and Institutional planning.
	Develop procedures on emergency evacuation of patients with disabilities from the clinic.	Mar 8, 2011.	Clinic Management.
	Develop guidelines on providing assistance to patients with disabilities who use the Clinic washrooms.	Mar 8, 2011.	Clinic Management.
	Develop guidelines on assisting patients with disabilities and others wishing to use various CMCC facilities.	Mar 8, 2011.	Clinic Management.
Customer Service Procedures for CMCC Library	Develop customer service procedures on assisting clients with disabilities in accessing the Library (notification, arrival at the 2 nd floor, movement through the doors); during registration and processing; on serving clients with assistive devices, service animals or support persons; and guidelines on use of Library materials and facilities by clients with disabilities.	Feb 23, 2011. Reviewed and reposted in Feb 2018.	Library Management.
	Develop procedures on emergency evacuation of clients with disabilities from the Library.	Feb 23, 2011.	Administration and Institutional Planning. Human Resources Managers.
Customer Service Procedures for CMCC Supply	Develop customer service procedures on assisting clients with disabilities in accessing the Supply Centre and Bookstore;	Feb 23, 2011.	Supply Centre and Bookstore Management.

Centre and Bookstore	with registration and payment; on serving clients with assistive devices, service animals or support persons.	Reviewed and reposted in Feb 2018.	
Customer Service Procedures for CMCC Students	<p>Accommodation for students with learning disabilities set out in academic policy – Academic Accommodations for Students with Disabilities.</p> <p>Develop customer service procedures on assisting clients with disabilities in accessing the Division of Student Services; with registration and payment; on serving clients with assistive devices, service animals or support persons.</p>	<p>Jun 3, 2009, Jun 1, 2013, Oct 23, 2014, Apr 27, 2017, Aug 30, 2018, Jan 30, 2020, Mar 30, 2023.</p> <p>Feb 23, 2011.</p>	Student Services.
Customer Service Procedures for CMCC Continuing Education	<p>Develop customer service procedures for individuals with disabilities with respect to communication, assistive devices, service animals, and support persons while in attendance at Continuing Education (CE) programs offered by CMCC.</p> <p>Develop accommodations to provide access to CE on-line programs for clients with disabilities.</p> <p>Develop procedures on Emergency evacuation of clients with disabilities while in attendance at CE programs at CMCC.</p>	<p>Feb 22, 2011.</p> <p>Reviewed and reposted in Feb 2018.</p> <p>Feb 22, 2011</p>	<p>Continuing Education.</p> <p>Administration and Institutional Planning. Human Resources. Continuing Education.</p>

<p>Customer Service Procedures for CMCC Reception Staff</p>	<p>Develop customer service procedures for individuals with disabilities with respect to accommodations and communication, while on CMCC premises.</p> <p>Develop procedures on emergency evacuation of clients with disabilities while on CMCC premises.</p>	<p>Dec 2011. Reviewed and reposted in Feb 2018.</p> <p>Dec 2011.</p>	<p>Administration and Institutional Planning. Human Resources.</p>
<p>Customer Service Procedures for CMCC Physical Facilities</p>	<p>Develop customer service procedures for individuals with disabilities with respect to accommodations, communication, and while on CMCC premises, as well as procedures on leaving the facilities.</p> <p>Develop procedures on Emergency evacuation of clients with disabilities while on CMCC premises.</p>	<p>Dec 2011. Reviewed and reposted in Feb 2018.</p> <p>Dec 2011.</p>	<p>Administration and Institutional Planning. Human Resources.</p>

Integrated Accessibility Standards Regulation - Information and Communications Standards

CMCC is required to establish policies and procedures in relation to how it provides Information and Communications in accessible formats to persons with disabilities. The Information and Communications Standards apply to employees, students, interns, educators and other visitors to CMCC’s facilities.

Compliance Date – Emergency Response Plans, if made available to the public, Jan 1, 2012. Other requirements for these standards will be phased between 2012 and 2025.

Information and Communications Standards:

Compliance Issue	Compliance Plan - Methods	Completion Date	Responsibility
<p>Feedback</p> <p>IAS O Reg. 191/11, s. 11</p>	<p>CMCC’s Accessibility web page contains contact information to allow employees, students and members of the public provide feedback on CMCC’s accessibility initiatives. Responses to said feedback will be posted on the site for public viewing when deemed appropriate.</p> <p>CMCC will arrange for provision of accessible formats and communications in support of the feedback and response process, should it be requested.</p>	<p>Commenced 2011 and ongoing.</p> <p>Jan 1, 2014.</p>	<p>Administration and Institutional Planning. Human Resources.</p>
<p>Accessible Formats and Communication Supports</p> <p>IAS O reg. 191/11, s. 12</p>	<p>Upon request, CMCC and all its Divisions have committed to provide or arrange for the provision of accessible formats and communication supports for persons with disabilities. These provisions will be provided in a timely manner that takes into account the person's accessibility needs, and at a cost that is no more than the regular cost</p>	<p>Jan 1, 2015.</p>	<p>Administration and Institutional Planning. Human Resources. Student Services. Continuing Education. Academic, including</p>

	<p>charged to other persons. CMCC will consult with the person making the request in determining the suitability of an accessible format or communication support.</p>		<p>Undergraduate and Chiropractic Residency Programs and Research. Clinic. Library Services. Supply Centre and Bookstore.</p>
<p>Emergency Procedure Plans or Public Safety Information</p> <p>IAS O Reg. 191/11, s. 13</p>	<p>In addition to its obligations under section 12 (above), any publicly posted emergency procedures, plans and safety information will be made available in accessible format or with appropriate communication supports, as soon as practicable, and upon request.</p>	<p>Jan 2013.</p>	<p>Administration and Institutional Planning.</p>
<p>Accessible Websites and Web Content</p> <p>IAS O Reg. 191/11, s. 14</p>	<p>Through a phased-in timeline, CMCC will ensure that their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA.</p> <p>CMCC has met the criteria for WCAG 2.0 Level A.</p> <p>CMCC internet websites and web content must conform with WCAG 2.0 Level AA.</p>	<p>Jan 1, 2014.</p> <p>Jan 1, 2021.</p>	<p>Marketing and Communication</p>
<p>Educational and Training Resources and Materials etc.</p> <p>IAS O Reg. 191/11, s. 15</p>	<p>When requested, CMCC will provide educational or training resources/materials in an accessible format by:</p> <ul style="list-style-type: none"> • purchasing or obtaining by other means an accessible or conversion ready electronic 	<p>May 1, 2013.</p>	<p>Administration and Institutional Planning. Human Resources. Student Services. Continuing</p>

	<p>format of educational or training resources or materials, when available</p> <ul style="list-style-type: none"> arranging for the provision of a comparable resource in an accessible or conversion ready electronic format <p>When requested, CMCC will provide student records and information on program requirements, availability and descriptions in an accessible format or through communication supports to persons with disabilities.</p>		<p>Education. Academic, including Undergraduate and Chiropractic Residency Programs and Research. Clinic. Library Services. Supply Centre and Bookstore.</p>
<p>Training to Educators</p> <p>IAS O Reg. 191/11, s. 16</p>	<p>In addition to the requirements under section 7 (Training), CMCC has provided all Faculty and Educators with accessibility awareness training related to accessible program, course delivery and instruction. Training modules on these topics were developed and posted online via KIRO to assist all faculty and educators on generating accessible Word and PowerPoint materials, as well as guidelines on accessible lecturing. Tracking of the training is being kept on KIRO and certificates are available for employee records. In addition, CFD has development further training as part of their Teacher Education Program (TEP).</p>	<p>Jun 26, 2013. June 1, 2019.</p>	<p>Administration and Institutional Planning. Human Resources. Curriculum Faculty Development (CFD).</p>
<p>Producers of Educational or</p>	<p>As an organization that is a producer of educational or training textbooks, CMCC will upon request make accessible or</p>	<p>Jan 1, 2015 – for accessible or conversion</p>	<p>Administration and Institutional Planning. Library.</p>

<p>Training Material</p> <p>IAS O Reg. 191/11, s. 17</p>	<p>conversion ready versions of the textbooks available to the institutions.</p> <p>As an organization that is a producer of print-based educational or training supplementary learning resources, CMCC will upon request make accessible or conversion ready versions of the printed materials available to the institutions.</p>	<p>ready versions of textbooks.</p> <p>Jan 1, 2020 – for accessible or conversion ready versions of printed materials that are educational or training supplementary learning resources.</p>	<p>Services. Supply Centre and Bookstore.</p>
<p>Libraries of Educational and Training Institutions</p> <p>IAS O Reg. 191/11, s. 18</p>	<p>Where available and upon request, CMCC Library Services will provide, procure or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for a person with a disability.</p> <p>Exemptions: Special collections, archival materials, rare books & donations.</p>	<p>Jan 1, 2015 - for print based resources or materials.</p> <p>Jan 2, 2020 – for digital or multimedia resources or materials.</p>	<p>Administration and Institutional Planning. Library Services.</p>

Integrated Accessibility Standards Regulation - Employment Standards

CMCC is required to establish policies and procedures with regard to providing Employment services to persons with disabilities. The Employment Standards require CMCC to make available accessible provisions across all stages of employment by pro-actively removing barriers across the employment life cycle. CMCC will create workplaces that are accessible, and which allow employees to reach their full potential. The Employment Standards apply to employees, potential employees, and students of CMCC.

Compliance Date – January 1, 2012

CMCC was required to provide their employees with disabilities with emergency response information that is tailored to the employee’s needs, if the disability requires it.

All other requirements are due by January 2015.

Employment Standards:

Compliance Issue	Compliance Plan - Methods	Completion Date	Responsibility
Multi-year Accessibility Plan - Employment Standard O. Reg. 191/11, s. 20	CMCC has added this portion of the Employment Standard to its Multi-year Accessibility Plan. The plan outlines CMCC’s strategies to prevent and remove barriers and to comply with the requirements under the Employment Standard. This plan is to be reviewed on an on-going basis to ensure it is kept updated with the changing legislation. The plan, in its entirety, is posted on the public CMCC Accessibility web page and can be provided in accessible format upon request.	Jan 1, 2014 Reviewed Jan 1, 2020, Aug 2023.	Administration and Institutional Panning. Human Resources.
Employment Standard Accessibility Policy	CMCC has approved its Accessibility Policy on the Integrated Regulation - Employment Standard. The policy is posted on the public CMCC Accessibility web page for access	Jan 1, 2015.	Administration and Institutional Planning.

O. Reg. 191/11, s. 20-21	by employees, students and the public. This policy can be provided in accessible format upon request.	Reviewed and updated August 2023.	Human Resources.
Recruitment O. Reg. 191/11, s. 22-24	CMCC has added a statement to all internal and external job postings, notifying employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.	Jan 1, 2015.	Administration and Institutional Planning. Human Resources.
Informing Employees of Supports O. Reg. 191/11, s. 25	Policies and procedures used to support employees with disabilities will be posted online for employees. CMCC will inform all new employees of the policies and procedures through the Orientation process, which is also posted online via HR landing page.	Jan 1, 2015.	Administration and Institutional Planning. Human Resources.
Accessible Formats and Communication Supports for Employees O. Reg. 191/11, s. 26	CMCC will, upon request, provide or arrange for accessible formats and/or communication supports for persons with disabilities on any information needed to perform their job; as well as any information that is generally available to employees in the workplace.	Jan 1, 2015.	Administration and Institutional Planning. Human Resources.
Emergency Plans O. Reg. 191/11, s. 27	Further to Emergency plans that were created in 2011 (Customer Service Standard), upon request, CMCC will provide employees with disabilities individualized emergency response information, which will be updated whenever a physical relocation of the job	Jan 1, 2012.	Administration and Institutional Planning. Human Resources. Health and Safety. Physical Facilities.

	takes place, or changes to the physical location occur.		
Individual Accommodation Plans O. Reg. 191/11, s. 28	CMCC's HR department has in place a written process for the development of documented individual accommodation plans for employees with disabilities. This information is in the Employment Standard Policy and is available to employees.	Jan 1, 2015.	Administration and Institutional Planning. Human Resources.
Return to Work Process O. Reg. 191/11, s. 29	CMCC's HR department has in place a return to work process for employees who have been absent from work due to a disability and require disability related accommodations in order to return to work. This process outlines the steps CMCC will take to facilitate the return to work and will use the documented individual accommodation plans as described in section 28 (above). This information is in the Employment Standard Policy and is available to employees.	Jan 1, 2015.	Administration and Institutional Planning. Human Resources.
Performance Management, Career Development, Advancement and Redeployment O. Reg. 191/11, s. 30-32	CMCC will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans of employees with disabilities when conducting performance management and career development initiatives; similarly, when providing advancement or redeployment opportunities for their employees.	Jan 1, 2015.	Administration and Institutional Planning. Human Resources.

Transportation Standards

These standards do not apply to CMCC.

Design of Public Spaces Standards

Design of Public Spaces Standards (previously the Accessibility Standards for the Built Environment) address access to and within buildings and outdoor spaces. These standards are harmonized with the Ontario Building Code, and cover issues such as counter height, aisle and door width, parking, and way-finding signage.

These standards apply to public spaces that are **newly constructed or redeveloped** on or after the timelines outlined below. Unplanned changes to existing public spaces to meet the standard are not required (includes emergency repairs or forced changes that were not anticipated or planned for in advance).

Design of Public Spaces Standards:

Compliance Issue	Compliance Plan - Methods	Completion Date	Responsibility
Make Recreation Trails and beach Access Routes Accessible	Not applicable to CMCC.		
Make Outdoor Public Eating Areas Accessible (rest stops or picnic areas)	Not applicable to CMCC.		
Make Outdoor Play Spaces Accessible (playgrounds)	Not applicable to CMCC.		
Make Parking Accessible – Off Street parking.	CMCC is not currently building new parking spaces however in 2021, upper parking lot was redeveloped to incorporate additional accessible spots to the existing space in order for CMCC to comply with standard requirements.	Jan 1, 2017. Aug 1, 2021.	Physical Facilities. Administration and Institutional Planning.

	<p>Current requirements include:</p> <p>A minimum number of accessible parking spaces. Parking spaces are in two types:</p> <ul style="list-style-type: none"> • Wider spaces for people who use mobility aids (e.g., wheelchairs) • Standard-width spaces for people who use mobility-assistive devices (e.g., canes, crutches and walkers). <p>Extra spaces called “access aisles” between parking spaces. The access aisles must be wide enough for people with disabilities to get in and out of their vehicles.</p> <p>Clearly marked accessible spaces with the required signage.</p>		
<p>Making Parking Accessible – On-Street Parking</p>	<p>Not applicable to CMCC.</p>		
<p>Making Service Counters, Queuing Guides and Waiting Areas Accessible</p>	<p>CMCC does not have to change existing service counters, waiting lines or seated waiting areas to comply with this standard. However, should CMCC build new service counters, it will comply with standard requirements.</p> <p>Service counters may be desks or counter spaces where people have face-to-face conversations with staff to receive service (i.e., reception desks, cashier</p>	<p>Jan 1, 2017.</p>	<p>Physical Facilities. Administration and Institutional Planning. All Departments.</p>

	<p>counters). Accessibility requirements include:</p> <ul style="list-style-type: none"> • At least one service counter accessible to people who use mobility aids, such as wheelchairs. The area should be low enough to allow the person with a disability to interact with the person providing service. There should also be enough room under the counter for the knees of a person sitting in a wheelchair • In situations where there is a single wait line then all service counters should be made accessible • clearly identify all accessible service counters with signs. 		
<p>Maintain the Accessible Parts of your Public Spaces</p> <p>(Outdoor paths of travel, like sidewalks, ramps, stairs curb ramps, rest areas and accessible pedestrian signals)</p>	<p>When accessible public spaces are not available or working due to maintenance of that space, the CMCC Physical Facilities division will post signs to explain the disruption as well as set-up temporary accessible areas whenever possible.</p>	<p>Jan 1, 2017.</p>	<p>Physical Facilities. Administration and Institutional Planning.</p>