



Canadian Memorial Chiropractic College

ACCESSIBILITY STANDARDS COMPLIANCE PLAN

Last update: January 2020

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CMCC Accessibility Standards Compliance Plan

Table of Contents

➤ Background.....	1
➤ Integrated Accessibility Standards Regulation – General Requirements.....	3
➤ Customer Service Standards.....	5
➤ Information and Communications Standards	9
➤ Employment Standards.....	10
➤ Transportation Standards	12
➤ Design of Public Spaces Standards	15

CMCC Accessibility Standards Multi-Year Compliance Plan

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, which was renamed 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 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 is 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 Standards. The Transportation Standards do not apply to CMCC.

The Design of Public Spaces Standards (previously Accessible Built Environment Standard) were passed in the fall of 2013. For the most part, these standards do not apply to CMCC. However, there are some aspects of these standards that we 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 to date. The standards of Customer

CMCC Accessibility Standards Multi-Year Compliance Plan

Service, Information and Communications, Employment, Transportation, and the Design of Public Spaces now all fall under the Integrated Accessibility Standards 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 has a similar focus although a broader mandate and is called the Equity, Diversity and Inclusion Committee (EDI).

The scope of the EDI Committee is to strive to create a community at CMCC where all students, staff and faculty 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 barriers, discrimination and intolerance. The committee will meet on a quarterly basis.

The Accessibility Standards Compliance Plan will be updated as strategies are identified in order to ensure compliance with the standards.

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.

CMCC Accessibility Standards Multi-Year Compliance Plan

Integrated Accessibility Standards Regulation - General Requirements

Under the Integrated Accessibility Standards Regulation (“The Integrated Standards”), CMCC is required to establish policies and procedures covering accessibility standards in **Customer Service, 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 from January 1, 2012 to January 1, 2025.

The Integrated Standards apply to staff and faculty, potential staff and faculty, students, interns, educators and other visitors to CMCC’s facilities.

The Integrated Accessibility Standards set out a variety of **general obligations** that are 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

<i>Integrated Accessibility Standards – General Obligations</i>			
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 Standards. The policy is posted online for access by employees and students, and can be available in accessible formats upon request. A Commitment Statement on supporting accessibility initiatives as they relate to the Integrated Standards and achieving accessibility in a timely manner is posted on the public website.	Jan. 31, 2013 Reviewed every year. Last revision Jan 2020	- Administration and Finance - Human Resources
Accessibility Plans IAS O. Reg. 191/11, s. 4	The CMCC multi-year accessibility plan, outlining strategies to prevent and remove barriers and to meet requirements under the Integrated Standards 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. This revised plan is posted on the public website, and can be provided in an accessible format upon request.	Finalized Dec. 23, 2013 Reviewed; November 2018 January 2020	- Administration and Finance - Human Resources
Procurement IAS O. Reg. 191/11, s. 5	Whenever possible CMCC has incorporated accessibility criteria into their processes for procuring or acquiring goods, services and/or facilities.	Jan. 1, 2013	- Administration and Finance - Human Resources

CMCC Accessibility Standards Multi-Year Compliance Plan

<i>Integrated Accessibility Standards – General Obligations</i>			
Compliance Issue	Compliance Plan – Methods	Completion Date	Responsibility
	Should it be deemed not practical to incorporate this criterion in its procurement process, CMCC will provide, upon request, an explanation of this determination.		
Self Service Kiosks IAS O. Reg. 191/11, s. 6	Not Applicable to CMCC	N/A	
Training IAS O. Reg. 191/11, s. 7	<p>A learning module was developed and posted online via KIRO to assist all CMCC staff, faculty and Clinic interns in their understanding of the Integrated Standards and its requirements.</p> <p>Tracking of the training is being kept on KIRO and certificates are available for employee/intern records.</p>	<p>Jul. 6 2013</p> <p>Ongoing</p> <p>Part of the orientation/onboarding of new hires and new interns.</p>	<ul style="list-style-type: none"> - Administration and Finance - Human Resources

CMCC Accessibility Standards Multi-Year Compliance Plan

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, members and other visitors to CMCC's facilities.

Compliance Date – January 1, 2012

<i>Customer Service Standards</i>			
<i>Compliance Issue</i>	<i>Compliance Plan – Methods</i>	<i>Completion Date</i>	<i>Responsibility</i>
Policy	CMCC approved its policy Accessibility - Customer Service for Persons with Disabilities. The policy is posted online for access by employees and students.	Jul. 22, 2010 Reviewed Aug 31, 2017	- Administration and Finance
Public Statement	The CMCC Public Statement regarding its support of the Accessibility initiative available to the public on CMCC's website.	Dec. 2011	- Administration and Finance - Human Resources
Education	A PowerPoint and Online educational module was developed to assist all CMCC staff, administrators, faculty and Clinic Interns in completing their Customer Service Training.	Mar. 2011	- Human Resources - Administration and Finance
	All CMCC staff, faculty, Clinic interns and administrators are required to complete the educational module.	Dec. 15, 2011	- Human Resources
Customer Service procedures for CMCC Clinics	Develop customer service procedures with respect to communication, assistive devices, service animals, and support persons while greeting and serving patients with disabilities through the clinic reception.	Mar. 8, 2011 Reviewed and reposted on February 2018	- Clinic Management - Human Resources - Administration and Finance
	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 clinic washrooms.	Mar. 8, 2011	- Clinic Management
	Develop guidelines on assisting patients with disabilities wishing to use the CMCC Cafeteria or the Library.	Mar. 8, 2011	- Clinic Management - Library 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 on February 2018	- Library Management
	Develop procedures on emergency evacuation of clients with disabilities from the Library.	Feb. 23, 2011	- Admin and Finance - Human Resources - Managers

CMCC Accessibility Standards Multi-Year Compliance Plan

Customer Service Standards			
Compliance Issue	Compliance Plan – Methods	Completion Date	Responsibility
Customer Service procedures for CMCC Supply Centre and Bookstore	Develop customer service procedures on assisting clients with disabilities in accessing the Supply Centre and Bookstore; with registration and payment; on serving clients with assistive devices, service animals or support persons.	Feb. 23, 2011 Reviewed and reposted on February 2018	- Supply Centre and Bookstore Management
Customer Service procedures for CMCC students	Accommodation for students with disabilities – set out in academic policy: Academic Accommodation for Students With Disabilities.	Jun. 3, 2009 Revised 2013, 2014 2017 and August 30, 2018	- Student Services
	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.	Feb. 23, 2011	- Student Services
Customer Service procedures for CMCC Continuing Education	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.	Feb. 22, 2011 Reviewed and reposted on February 2018	- Continuing Education
	Develop accommodations to provide access to CE on-line programs for clients with disabilities.	Feb. 22, 2011	- Continuing Education
	Develop procedures on emergency evacuation of clients with disabilities while in attendance at CE programs at CMCC.	Feb. 22, 2011	- Administration and Finance - Human Resources - Continuing Education
Customer Service procedures for CMCC Reception Staff	Develop customer service procedures for individuals with disabilities with respect to accommodations and communication, while on CMCC premises.	Dec. 2011 Reviewed and reposted on February 2018	- Administration and Finance - Human Resources
	Develop procedures on emergency evacuation of clients with disabilities while on CMCC premises.	Dec. 2011	- Administration and Finance - Human Resources
Customer Service procedures for CMCC Physical Facilities	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.	Dec. 2011 Reviewed and reposted on February 2018	- Administration and Finance - Human Resources
	Develop procedures on emergency evacuation of clients with disabilities while on CMCC premises.	Dec. 2011	- Physical Facilities

CMCC Accessibility Standards Multi-Year Compliance Plan

Integrated Accessibility Standards Regulation - Information & 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 staff, faculty, 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 in between 2012 and 2025.

<i>Information and Communications Standards</i>			
<i>Compliance Issue</i>	<i>Compliance Plan – Methods</i>	<i>Completion Date</i>	<i>Responsibility</i>
Feedback IAS Regulation O. Reg. 191/11, s. 11	CMCC’s Accessibility web page contains the contact information to allow employees, students and members of the public to provide feedback on CMCC accessibility initiatives. Responses to said feedback will be posted on the site for public viewing when deemed appropriate. CMCC will arrange for the provision of accessible formats and communications supports of the feedback and response process, should it be requested.	Commenced 2011 and ongoing Jan. 1, 2014	- Administration and Finance - Human Resources
Accessible Formats and Communication Supports IAS Regulation O. Reg. 191/11, s. 12	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 charged to other persons. CMCC will consult with the person making the request in determining the suitability of an accessible format or communication support.	Jan. 1, 2015	- Administration and Finance - Human Resources - Student Services - Continuing Education - Undergraduate Education - Graduate Education - Clinic - Library Services - Supply Centre & Bookstore
Emergency procedure plans, or public safety information IAS Regulation O. Reg. 191/11, s. 13	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.	Jan. 2013	- Administration and Finance
Accessible websites and web content IAS Regulation O. Reg. 191/11, s. 14	Through a phased-in timeline, CMCC will ensure that their website 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.		- Marketing and Communications

CMCC Accessibility Standards Multi-Year Compliance Plan

Information and Communications Standards			
Compliance Issue	Compliance Plan – Methods	Completion Date	Responsibility
	<p>CMCC has met the criteria for WCAG 2.0 Level A</p> <p>CMCC websites and web content must conform with WCAG 2.0 Level AA</p>	<p>Jan. 1, 2014</p> <p>Jan. 1, 2021</p>	
<p>Educational and training resources and materials, etc. Regulation 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 format of educational or training resources or materials, when available, or • arrange 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>May 1, 2013</p>	<ul style="list-style-type: none"> - Administration and Finance- Human Resources - Student Services - Continuing Education - Undergraduate Education - Graduate Education - Clinic - Library Services - Supply Centre & Bookstore
<p>Training to educators IAS Regulation 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 an 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.</p>	<p>Jun. 26, 2013</p>	<ul style="list-style-type: none"> - Administration and Finance - Human Resources
<p>Producers of educational or training material IAS Regulation O. Reg. 191/11, s. 17</p>	<p>As an organization that is a producer of educational or training textbooks, CMCC will upon request make accessible or 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>Jan. 1, 2015 – for accessible or conversion-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>	<ul style="list-style-type: none"> - Administration and Finance - Library Services - Supply Centre and Bookstore

CMCC Accessibility Standards Multi-Year Compliance Plan

<i>Information and Communications Standards</i>			
<i>Compliance Issue</i>	<i>Compliance Plan – Methods</i>	<i>Completion Date</i>	<i>Responsibility</i>
Libraries of educational and training institutions IAS Regulation O. Reg. 191/11, s. 18	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. Exemptions: Special collections, archival materials, rare books & donations	Jan. 1, 2015 – for print-based resources or materials Jan. 1, 2020 – for digital or multimedia resources or materials	- Administration and Finance - Library Services

CMCC Accessibility Standards Multi-Year Compliance Plan

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, faculty, potential employees/faculty, 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 were due 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 review on an on-going basis to ensure it is kept up to date 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	- Administration and Finance - Human Resources
Employment Standard Accessibility Policy O. Reg. 191/11, s. 20	CMCC has approved its policy Accessibility - Integrated Regulation: Employment Standards. The policy is posted on the CMCC Accessibility web page for access by staff, faculty, students and the public. This policy can be provided in accessible format upon request	Jan. 1, 2015	- Administration and Finance - 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 in its recruitment process for applicants with disabilities.	Jan. 1, 2015	- Administration and Finance - HR
Informing employees of supports O. Reg. 191/11, s. 25	Policies and procedures used to support employees with disabilities are 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 the HR landing page on MyCMCC.	Jan. 1, 2015	- Administration and Finance - 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 Finance - Human Resources

CMCC Accessibility Standards Multi-Year Compliance Plan

Employment Standards			
Compliance Issue	Compliance Plan – Methods	Completion Date	Responsibility
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 takes place, or changes to the physical location occur.	Jan. 1, 2012	- Administration and Finance - Human Resources - Health and Safety - Physical Facilities
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 Standards policy and is available to employees and faculty.	Jan. 1, 2015	- Administration and Finance - 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 outline 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 Finance - 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 Finance - Human Resources

CMCC Accessibility Standards Multi-Year Compliance Plan

Integrated Accessibility Standards Regulation - **Transportation Standards**

These standards do not apply to CMCC.

CMCC Accessibility Standards Multi-Year Compliance Plan

Integrated Accessibility Standards Regulation - 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).

<i>Design of Public Spaces Standards</i>			
Compliance Issue	Compliance Plan – Methods	Completion Date	Responsibility
Make Recreation Trails and Beach Access Routes Accessible	Does not apply to CMCC		
Make Outdoor Public Eating Areas Accessible (rest stops or picnic areas)	Does not apply to CMCC		
Make Outdoor Play Spaces Accessible (playgrounds)	Does not apply to CMCC		
Make Parking Accessible – Off Street parking	<p>CMCC is not currently building new parking spaces, however any redevelopment of parking spaces will be compliance.</p> <p>Current requirements include:</p> <ol style="list-style-type: none"> 1. A minimum number of accessible parking spaces. Parking spaces are in two types: <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) 2. 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. 3. Clearly marked accessible spaces with the required signage. 	Jan. 1, 2017	- Physical Facilities - Administration and Finance
Making Parking Accessible – On-Street Parking	Does not apply to CMCC		
Making Service Counters, Queuing Guides and Waiting Areas accessible	CMCC does not have to change existing service counters, waiting lines or seated waiting areas to comply with this standard. However should CMCC	Jan. 1, 2017	- Physical Facilities - Administration and Finance - All Departments

CMCC Accessibility Standards Multi-Year Compliance Plan

<i>Design of Public Spaces Standards</i>			
Compliance Issue	Compliance Plan – Methods	Completion Date	Responsibility
	<p>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 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 	Barrier lowered at one spot at clinic reception but no place for the knees	
<p>Maintain the Accessible Parts of your Public Spaces (Outdoor paths of travel, like sidewalks, ramps, stairs curb ramps, rest areas and accessible pedestrian signals)</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.	Jan. 1, 2017	- Physical Facilities - Administration and Finance