

Canadian Medical Protective Association (CMPA)

Multi-Year Accessibility Plan

December 2013

(Updated April 2021)

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A Message from our Executive Director and CEO

As the CEO of the CMPA, I have three main goals for the Association – to continue to be there for physician members and employees, to modernize the CMPA, and to do so in a collaborative way. As part of this journey, the CMPA is committed to doing more to support equity, diversity, and inclusion within the Association and across healthcare, including fostering enhaned accessibility.

According to the Ontario government, by 2031, more than six million people in Ontario will be either living with a disability or be 55 years of age and over. Creating an organization where every person – our employees, physician members, elected Council, stakeholders, and suppliers – can participate as fully as possible reflects the CMPA's commitment to service excellence, is a sound investment, and makes good business sense.

I am pleased to share the CMPA's Multi-year Accessibility Plan to meet the *Integrated Accessibility Standards Regulation* (*IASR*) of the province's *Accessibility for Ontarians with Disabilities Act* (*AODA*). You will be able to see this Plan and the CMPA Accessibility Policy on our website. The CMPA's goal is to create and maintain an integrated plan that outlines our commitment and the associated activities to ensure compliance with the *AODA* and its Regulations.

It is my hope that, as we look towards building a more inclusive environment by removing and preventing barriers, all people will have a chance to make their own important contributions within our organization.

The CMPA is fully committed to meeting the needs of our members, employees and stakeholders, and we will adjust this Plan as we receive and respond to new and emerging information. Please feel free to provide your own feedback on the issues of importance to you.

Lisa Calder, MD, MSc, FRCPC Chief Executive Officer Canadian Medical Protective Association

CMPA Commitment to Accessibility

The CMPA is committed to treating all people in a way that allows them to maintain their integrity, dignity and independence and to provide an environment that fosters respect, integration and equal opportunity for our members, employees, stakeholders and the public. The CMPA is committed to being responsive to the diverse needs of its members, employees, and others, including those with disabilities, by striving to prevent and remove barriers to accessibility. The Association supports increased accessibility through its compliance with the requirements of the *Customer Service*, *Information and Communications*, *Employment*, and *Design of Public Spaces* standards of the *Integrated Accessibility Standards Regulation (IASR)* under the *Accessibility for Ontarians with Disabilities Act*, 2005 (AODA).

About the CMPA

- Governed by an elected council of physicians, the CMPA delivers efficient, high-quality physician-tophysician advice and assistance in medico-legal matters, including the provision of appropriate
 compensation to patients injured by negligent medical care (fault in Québec). Our evidence-based
 products and services enhance the safety of medical care, reducing unnecessary harm and costs. As
 Canada's largest physician organization and with the support of our over 100,000 physician members,
 the CMPA collaborates, advocates and effects positive change on important healthcare and medico-legal
 issues.
- As a mutual defense organization, thhe CMPA provides members with liability protection, advice, and resources to help manage medico-legal risk in clinical practice. In turn, members are expected to practise in a manner that aligns with the ethics and expectations of the profession and supports the values of the Association (or mutual) as a whole as articulated in its Bylaw.
- The CMPA relies on the talent and expertise of its 400+ employees to achieve the Strategic Plan and to deliver on its core mandate to members. CMPA has a dedicated team of physician employees who provide medico-legal advice and support to members, and deliver education about appropriate prevention strategies and promote measures to enhance the safety of care. CMPA employees also have professional expertise in finance, investment and actuarial services, communication, member services, information technology, corporate services, governance and administration, human resources, case review, practice improvement and medical care analytics.
- In response to COVID-19, the CMPA has evolved its approach to learning delivery and pivoted from face-to-face sessions to more easily accessed digital learning products. The Association continues to deliver impactful safe medical care learning to member and other healthcare professionals across the country in the format that best meets there needs..
- CMPA is one of the largest providers of accredited continuing medical education in Canada today. Through its evidence-based learning offerings, the CMPA advances safety improvements that reduce harm in healthcare delivery. By contributing to safer care, the CMPA's efforts benefit all Canadians.
- A growing library of safe care resources and risk reduction strategies are available to members through multiple CMPA channels.
- CMPA's capability in the area of medical analytics has generated hundreds of studies, many of which have positively influenced medical practice in Canada and internationally. With the implementation of its 2019-2022 Strategic Plan, the Association has focused its efforts in contributing to safe medical care by collaborating with like-minded organizations to effect positive change at both the individual practitioner and system levels. Moving forward, the Association will continue to undertake broad awareness campaigns, provide customized support to members demonstrating increasing medico-legal risk, providing just-in-time information related to COVID-19, and develop targeted educational efforts and knowledge transfer to support the prevention of harm from medical care and the reduction of harm from high-risk areas of practice.
- As a not-for-profit mutual defence organization, the CMPA is the principal provider of medico-legal
 assistance to physicians across Canada. Through both the provision of effective and efficient medical
 liability protection and the delivery of evidence-based programs aimed to improve the safety of medical
 care, the CMPA is an essential component of the Canadian healthcare system. Through its work, the
 CMPA:
 - Enables physicians to practise confidently and to make decisions that result in better patient care and a more efficient healthcare system
 - o Provides appropriate compensation to patients proven to have been harmed through negligent medical care (fault in Québec)
 - Collaborates with stakeholders and leverages pan-Canadian experience and perspective to impact the healthcare system

- Ensures physicians receive assistance and fair representation when medico-legal matters arise
- Strives to achieve medico-legal outcomes that are ethical and fairly benefit Canada's healthcare system
- o Advance innovative solutions to meet evolving member and stakeholder needs.

Our Vision

The CMPA is valued as an essential component of the Canadian healthcare system.

Our Mission

To protect the professional integrity of physicians and promote safe medical care in Canada.

Accessibility Achievements to Date

- Development and implementation of CMPA Accessibility Standards for Customer Service Policy
- Customer Service Accessibility Standards training sessions for all new and existing employees, volunteers, and third party contractors who deal with CMPA members
- Implementation of feedback process on CMPA website
- Workplace Emergency Response Information procedures have been modified to notify employees with
 a disability of the requirement to inform Human Resources should they require assistance in the event of
 an emergency, fire evacuation and lock down activity/drill, etc.
- Ongoing AODA Accessibility compliance reports filed with the Ontario government
- CMPA website redesigned in 2013, voluntarily making the website largely compliant with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A
- CMPA website updated in 2020 to comply with the WCAG 2.0 Level AA in accordance with the schedule set out in the *Accessibility for Ontarians with Disabilities Act, 2005*, Integrated Accessibility Standards
- Development of CMPA Accessibility Policy and Multi-Year Plan
- Existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner
- Written information and other forms of communication are available to CMPA members, CMPA employees and the public in various accessible formats, upon request
- Implementation of the Accessible Formats and Communication Supports Procedure
- Implementation of the Accommodation for Employees with Disabilities Policy and Procedure
- Accessible recruitment, assessment and selection process
- Performance Management Program and *Employee Recognition Policy* that take into account the accessibility needs of employees with disabilities
- Continuing Education and Professional Development Policy which takes into account the accessibility needs of employees with disabilities
- Implementation of the *Return to Work Policy and Procedure* for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work
- Consideration of accessibility needs and individual accommodation plans when redeploying employees with disabilities
- Implementation of a program to ensure all employees and volunteers are provided with appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, and are provided with such training as soon as practicable

Barrier Prioritization and Removal

Accessibility planning at CMPA has been incorporated into the Association's Operational Plan and Budget and departmental operational plans as required. CMPA continues to review and monitor progress in identifying, reviewing and removing barriers, primarily through the development and implementation of the multi-year accessibility plan. In addition, CMPA will engage and ensure accountability in implementing initiatives through reporting and an update to the CMPA Council, as required. Criteria established to set priorities include the following:

- Requirements of the legislation
- Barriers that have been identified by members, employees, the public, and stakeholders
- Number of people affected by a barrier
- Availability of practical solutions that can be readily implemented
- Availability of a way to avoid a barrier (i.e. work around it)
- Availability of a way to prevent a future recurrence
- Availability of resources required to remedy a barrier (i.e. timing/phasing, factor/cost)

- Magnitude of risk posed by a barrier (i.e. estimated severity of the barrier) Relationship to scheduled renovations and other capital projects

Accessibility for Ontarians with Disabilities Act, 2005 Integrated Accessibility Standards – Ontario Regulation 191/11 Amended by Ontario Regulation 413/12

Canadian Medical Protective Association - Multi-Year Accessibility Plan - December 2013 (Updated April 2021)

PART I – GENERAL Sections 1 to 8

This section of the Regulation requires the Canadian Medical Protective Association (CMPA) to:

- Develop accessibility policies and a multi-year accessibility plan
- Report to the Ministry on the progress of the multi-year plan
- Incorporate accessibility features and considerations in procurement process (Note: The CMPA is exempt from this requirement)
- Incorporate accessibility features into self-service kiosks (Note: The CMPA does not design, procure, acquire or operate self-service kiosks)
- Ensure employees, volunteers and third party service providers have been trained on the Integrated Accessibility Standards Regulation and the Ontario Human Rights Code

Section	Regulatory Requirement	Compliance Date	Implementation Actions To Be Taken	Responsible Department(s)
Section 1 – Purpose and Application	See Appendix A	Not applicable	Reference specific sections outlined below	Not applicable
Section 2 – Definitions	See Appendix A	Not applicable	Not applicable	Not applicable
Section 3 – Establishment of Accessibility Policies	Accessibility policies Develop, implement and maintain accessibility policies, including a statement of organizational commitment Make policies publicly available and, on request, provide them in an accessible format.	January 1, 2014	 Consult with departments for input into the Association's accessibility policy, including proposed revisions to the CMPA Accessibility Standards for Customer Services policy as required Develop, implement and maintain an accessibility policy that addresses the requirements in the Customer Service Standards Regulation, previously approved, and the Integrated Accessibility Standards Regulation, including a statement of organizational commitment Post the policy on the CMPA website Completed – The CMPA Accessibility Policy is available on the website	Executive Services and Governance

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			The CMPA Request for Information in an Accessible Format online form is available on the CMPA website	
Section 4 – Accessibility Plans	Multi-year accessibility plan Establish, implement, maintain and document a multi-year accessibility plan Post plan on the website and provide in an accessible format, upon request	January 1, 2014	 Consult with departments for input into the Association's multi-year accessibility plan Develop a multi-year accessibility plan that sets out how the CMPA will comply with requirements of the <i>Integrated Accessibility Standards Regulation</i> Post the multi-year accessibility plan on the CMPA website Review and update the plan every two years (Note: The Regulation states 5 years) Completed – The CMPA Accessibility Multi-Year Plan is available on the website The CMPA Request for Information in an Accessible Format online form is available on the CMPA website 	Executive Services and Governance
Section 5 – Procuring or Acquiring Goods, Services or Facilities	Accessibility in procuring or acquiring goods, services or facilities This requirement only applies to the Government of Ontario, the Legislative Assembly and designated public sector organizations	Not applicable	 The CMPA is exempt from this section When procuring services from a provider who will engage directly with the membership, the CMPA may incorporate accessibility requirements related to the service regarding the accommodation of persons with disabilities. The CMPA Statement of Work shall contain the following term, or a variation thereof: "Contractor and its employees and permitted subcontractors shall comply with all applicable laws, statutes, ordinances, by-laws and regulations". If this is not practicable, the Association shall provide an explanation, on request 	Not applicable
Section 6 – Self-Service Kiosks	Accessibility features in self-service kiosks ■ In this section, "kiosk" means an interactive electronic terminal, including a point-sale device, intended for public use that allows users to access one or more services or products or both. People use self-service kiosks for various purposes including paying for fares and parking, as well as for validating tickets and checking prices. Kiosks are also used as self-service checkouts in many retail stores today. Most self-service kiosks allow people to complete transactions through point-of-sale devices using a debit, credit or other electronic funds card. When determining what accessibility features can be included in the design or purchase of a kiosk, organizations may consider technical features, structural features, and the access path to the kiosk.	Not applicable	The CMPA is exempt from this section	Not applicable

Section 7 – Training	Training Ensure that training on the IASR and the Human Rights Code as it pertains to persons with disabilities is provided to employees, volunteers, and others who provide goods, services or facilities on behalf of organization	January 1, 2015	 Inform Council, Senior Management and Supervisors of implications and responsibilities regarding organizational compliance with IASR training requirements Completed Q4 2013 2014 and beyond Determine and deliver appropriate training on the requirements of the IASR and on the Ontario Human Rights Code, as it pertains to persons with disabilities, to all senior management, employees, and volunteers. New employees will receive training on the Accessible Customer Service Standards Regulation, on the IASR and on the Ontario Human Rights Code during their orientation period, or as soon as reasonably possible. Keep and maintain a record of the training provided Ensure that training is provided on any significant changes to the prescribed policies on an ongoing basis Completed – A training program has been put in place and will be adapted, as required, to incorporate significant changes in policy 	Human Resources

PART II – INFORMATION AND COMMUNICATIONS STANDARD Sections 9 to 19

This section of the Regulation includes requirements related to:

- Accessible feedback processes
- Accessible formats and communication supports
- Publicly available emergency procedures, plans, public safety information
- Accessible websites and web content

(Note: In accordance with the definition and categories of an obligated organization, the CMPA is exempt from sections 15, 16, 17, 18 and 19 of the IASR and the five bullets below)

- Educational and training resources and materials (applies to educational and training institutions)
- Training to educators (applies to educational and training institutions and to school boards)
- o Producers of educational or training material
- Libraries of educational and training material
- Public libraries

Section	Regulatory Requirement	Compliance Date	Implementation Actions To Be Taken	Responsible Department(s)
Section 9 – Definitions and Exceptions	See Appendix A	Not applicable	Not applicable	Not applicable
Section 10 – Application	 Application Feedback Accessible formats and communication supports Emergency procedure, plans or public safety information (Note: This component is not applicable to the CMPA as outlined under section 13 below) 	Not applicable	Reference sections 11 to 13 below	Reference sections 11 to 13 below
Section 11 – Feedback	 Feedback Processes Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing/arranging for accessible formats and communication supports, upon request Includes feedback from the public, employees, customers Notify the public about the availability of accessible formats and communication supports 	January 1, 2015	 Applicable CMPA forms (i.e. event registration, meeting requests, etc.) currently include wording that advises the individual to contact the Association if there are accessibility requirements Existing accessibility feedback processes and relevant accessibility documentation on CMPA's website, and availability to employees, will be reviewed and updated, as required Ensure that new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner 	Executive Services and Governance / Communications / Human Resources (for employees)

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			Completed – The CMPA Accessible Services feedback online form is available on the CMPA website	
Section 12 – Accessible Formats and Communication Supports	Accessible Formats and Communication Supports Upon request, provide for provision of accessible formats and communication supports for persons with disabilities Notify the public about the availability of accessible formats and communication supports	January 1, 2016	 Applicable CMPA forms (i.e. event registration, meeting requests, etc.) currently include wording that advises the individual to contact the Association if there are accessibility requirements Existing accessibility content on the CMPA's website and the availability of accessible formats will be reviewed and updated, as required Develop a procedure for requesting alternate formats and communication supports for CMPA members and the public More broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested: Provide or arrange for the provision of such accessible formats and communication supports Consult with the person making the request to determine the suitability of the accessible format or communication support Provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability Notify CMPA members and the public about the availability of accessible formats and communication supports, upon request, through the CMPA website, and all other channels of communication (e.g. CMPA Perspective, educational symposia and regional conferences, etc.) Completed – The CMPA Accessible Formats and Communication Supports Procedure was approved and is available to CMPA employees. The CMPA Request for Information in an Accessible Format online form is available on the CMPA website 	Executive Services and Governance / Communications
Section 13 – Emergency Procedures, Plans or Public Safety Information	Emergency procedures, plans or public safety information The section is not applicable to the CMPA in that the requirement only applies to organizations that prepare emergency procedures, plans or public	Not applicable	Not applicable	Not applicable
	safety information and make the information available to the public	January 1, 2012	Completed – A process has been put in place for employees to self-identify so that a workplace emergency response plan can be developed	Corporate Services / Human Resources

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	The CMPA currently meets requirements under Section 27 – Workplace Emergency Response Information			
Section 14 – Accessible Websites and Web Content	Accessible websites and web content Websites and web content to conform to WCAG 2.0 Level AA (excluding live captioning and audio description)	January 1, 2021	 Ensure development of next generation digital platform for public website, mobile applications, and information technology infrastructure meet AODA Information and Communication Standards and that partnering vendors have necessary expertise with such technology Undertake website redesign / technical upgrade to ensure compliance with level AA WCAG 2.0 requirements Completed – Effective December 23, 2020 CMPA website updated to comply with the WCAG 2.0 Level AA 	Communications / Information Technology Services
Section 15 – Educational and Training Resources and Materials	Educational and Training Resources and Materials This requirement applies to educational or training institutions. In accordance with the definition and categories of an obligated organization, the CMPA is exempt from sections 15, 16, 17, 18 and 19 of the IASR	Not applicable	Not applicable	Not applicable
Section 16 – Training to Educators	This requirement applies to school boards or educational or training institutions	Not applicable	Not applicable	Not applicable
Section 17 – Producers of Educational or Training Material	This requirement applies to producers of educational or training textbooks or educational training institutions	Not applicable	Not applicable	Not applicable
Section 18 – Libraries of Educational and Training Institutions	This requirement applies to libraries of educational and training institutions	Not applicable	Not applicable	Not applicable
Section 19 – Public Libraries	This requirement applies to public library boards	Not applicable	Not applicable	Not applicable

PART III – EMPLOYMENT STANDARD Sections 20 to 32

This section of the Regulation includes requirements related to:

- Recruitment, assessment and selection
- Accessible formats and communication supports for employees
- Workplace emergency response
- Return to work processes
- Performance management, career development and redeployment

Section	Regulatory Requirement	Compliance Date	Implementation Actions To Be Taken	Responsible
Section 20 – Scope and Interpretation	 The requirements under the Employment Standard apply to paid employees including, but not limited to, full-time, part-time, paid apprenticeships and seasonal employment While the regulation does not require the standard be applied to volunteers and other non-paid individuals, employers may wish to apply it as a good business practice 	Not applicable	Not applicable	Not applicable
Section 21 – Schedule	 This section establishes the compliance timelines that employers must meet for the Employment Standard Note: Section 27 of the Employment Standard – Workplace Emergency Response Information – has a compliance date of January 1, 2012 	January 1, 2016 January 1, 2012	Not applicable Completed – A process has been put in place for employees to self-identify so that a workplace emergency response plan can be developed	Corporate Services / Human Resources
Section 22 – Recruitment General	Notify employees and the public about the availability of accommodation for applicants with disabilities in the recruitment process	January 1, 2016	 Content on the CMPA's website (Careers webpage) and job postings will be updated to reflect that persons with disabilities who need accommodations in the application or interview process should contact the HR department, and that the application package is available in accessible formats upon request A review, and as necessary, modification of existing recruitment procedures and processes will be updated to reflect the requirements of the IASR Employment Standard Completed: Effective January 1, 2016 and will be implemented on an ongoing basis 	Human Resources

Section 23 – Recruitment, Assessment or Selection Process	Recruitment, Assessment or Selection Process Notify job applicants when selected to participate in an assessment or selection process that accommodations are available upon request	January 1, 2016	 CMPA will notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include: A review, and as necessary, modification of existing recruitment, assessment or selection procedures and processes to reflect the requirements of the Employment Standard Inclusion of availability of accommodation notice as part of the communication to schedule of an interview and / or assessment If a selected applicant requests an accommodation, consult with the applicant and arrange for the provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability Completed: Effective January 1, 2016 and will be implemented on an ongoing basis 	Human Resources
Section 24 – Notice to Successful Applicants	Notice to Successful Applicants • When making an offer of employment, notify successful applicants of policies for accommodating employees with disabilities	January 1, 2016	 When making offers of employment, CMPA will notify the successful applicant of its procedures for accommodating employees with disabilities. This will include: A review, and as necessary, modification of existing recruitment procedures and processes to reflect the requirements of the IASR Employment Standard Inclusion of notification of CMPA's procedures on accommodating employees with disabilities in offer of employment letters or reiterated verbally if the offer is made in person or by telephone Completed: Effective January 1, 2016 and will be implemented on an ongoing basis 	Human Resources
Section 25 – Informing Employees of Supports	Informing Employees of Supports Inform employees of policies to support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account employee's accessibility needs	January 1, 2016	 In accordance with the IASR, the CMPA will inform all employees of procedures that support employees with disabilities, including, but not limited to, procedures on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. This will include: Informing current employees and new hires of CMPA's procedures supporting employees with disabilities, including but not limited to, procedures on the provision of job accommodations that take into account an employees' needs due to disability Providing information under this section as soon as practicable after the new employee begins employment, specifically in the orientation process 	Human Resources

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			 Keeping employees up to date on changes to existing procedures on job accommodations with respect to disability Completed: Effective January 1, 2016 with implementation of the CMPA Accommodation for Employees with Disabilities Policy and Procedure and CMPA Accessible Formats and Communication Supports Procedure 	
Section 26 – Accessible Formats and Communication Supports for Employees	Accessible Formats and Communication Supports for Employees • When requested by an employee with a disability, employers shall provide or arrange for the provision of accessible formats and communication supports for information needed to perform employee's job and information generally available to employees in workplace	January 1, 2016	 In accordance with the IASR, where an employee with a disability so requests it, CMPA will provide or arrange for provision of suitable accessible formats and communications support for: Information that is needed in order to perform the employee's job Information that is generally available to employees in the workplace In meeting the obligations to provide the information that is set out in the paragraph above, the CMPA will consult with the requesting employee in determining the suitability of an accessible format or communication support Completed: Effective January 1, 2016 with implementation of the CMPA Accommodation for Employees with Disabilities Policy and Procedure and CMPA Accessible Formats and Communication Supports Procedure 	Human Resources
Section 27 – Workplace Emergency Response Information	Workplace Emergency Response Information Provide individualized workplace emergency response information to employees who have a disability, as required	January 1, 2012	 Completed - The following measures were implemented by the CMPA effective January 1, 2012: Based on the employee's needs, individualized workplace emergency response information procedures will be developed for employees with disabilities, as required Where required, the CMPA provides assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster. These plans for providing assistance have been set out in individualized emergency plans for the employees With consent, the individualized emergency plans will be communicated to the employees' respective managers and Safety personnel, on an 'as needed' basis On an ongoing and regular basis, and as per the applicable terms of the IASR, the CMPA will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed 	Corporate Services / Human Resources
Section 28 – Documented Individual	Documented Individual Accommodation Plans Develop and have in place a written process for the development of documented individual	January 1, 2016	2016 and beyond	Human Resources

Accommodation Plans	accommodation plans for employees with disabilities		CMPA's procedures will include steps that the CMPA will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability The CMPA will review and assess the existing procedures to ensure they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required The CMPA will ensure that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR Employment Standard: The manner in which the employee requesting accommodation can participate in the development of the plan The means by which the employee is assessed on an individual basis The manner in which CMPA can request an evaluation by an outside medical or other expert, at the CMPA's expense, to assist the CMPA in determining if and how accommodation can be achieved Steps are in place to protect the privacy of the employee's personal information Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which this will be done Provide the employee with the reasons for the denial if an individual accommodation plan is denied The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs If individual accommodation plans are established, ensure that they include: Any individualized workplace emergency response information that is required Any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with: Information that is needed in order to perform the employee's job Information that is needed in order to perform the employee's job Information that is generally available to employees in the workplace Identify any other accommodation that is to be provided to the employee Completed: Effective January 1, 2016 with im	
Section 29 – Return to Work Process	Return to Work Process Develop and have in place a return to work process for employees who have been absent from work due to a disability and require disability related	January 1, 2016	2016 and beyond The CMPA will ensure that the return to work process as set out in its existing procedures outlines the steps the CMPA will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as	Human Resources

	accommodations to return to work. The process shall be documented		outlined in Section 28 – Documented Individual Accommodation Plans, in the return to work process. Completed: Effective January 1, 2016 with implementation of the CMPA Return to Work Policy and Procedure	
Section 30 – Performance Management	Performance Management Take into account accessibility needs of employees with disabilities and individual accommodation plans as part of performance management processes	January 1, 2016	 2016 and beyond In accordance with the <i>IASR</i>, the CMPA will: Review, assess and, as necessary, modify existing procedures, practices and HR programs to ensure compliance with the <i>IASR</i> Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when assessing performance Completed: Effective January 1, 2016 - CMPA Performance management program and CMPA Employee Recognition Policy which take into account the accessibility needs of employees with disabilities 	Human Resources
Section 31 – Career Development and Advancement	Career Development and Advancement Take into account accessibility needs of employees with disabilities and individual accommodation plans when providing career development and advancement opportunities	January 1, 2016	 2016 and beyond In accordance with the <i>IASR</i>, the CMPA will: Review, assess and, as necessary, modify existing procedures, practices and HR programs to ensure compliance with the <i>IASR</i> Take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings Completed: Effective January 1, 2016 - CMPA Continuing Education and Professional Development Policy which takes into account the accessibility needs of employees with disabilities 	Human Resources
Section 32 – Redeployment	Redeployment Take into account accessibility needs of employees with disabilities and individual accommodation plans when redeploying employees	January 1, 2016	 2016 and beyond In accordance with the <i>IASR</i>, the CMPA will: Review, assess and, as necessary, modify existing procedures, practices and HR programs to ensure compliance with the <i>IASR</i> Take into account the accessibility needs of employees with disabilities when redeploying employees Completed: Effective January 1, 2016 - Consideration of accessibility needs and individual accommodation plans when redeploying employees with disabilities 	Human Resources

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PART IV – TRANSPORTATION STANDARD Sections 33 to 80

This section of the Regulation includes requirements related to:

- General requirements for conventional and specialized transportation service providers
- Accessibility plans
- Technical requirements
- Other transportation services
- Duties of municipalities and taxicabs
 Note: Sections 33 to 80 are not applicable to the CMPA

Section	Regulatory Requirement	Compliance Date	Implementation Actions To Be Taken	Responsible
Section 33 - Definitions	In accordance with the definitions of "conventional transportation service provider" and "specialized transportation service provider", sections 33 to 80 are not applicable to the CMPA	Not applicable	Not applicable	Not applicable

PART IV.1 – DESIGN OF PUBLIC SPACES STANDARDS (ACCESSIBILITY STANDARDS FOR THE BUILT ENVIRONMENT) Sections 80.1 to 80.44

The standards for the design of public spaces only apply to new construction and major changes to existing features.

- Recreation trails and beach access routes (not applicable to the CMPA)
- Outdoor public use eating areas
- Outdoor play spaces (not applicable to the CMPA)
- Exterior paths or travel
- Accessible parking
- Service counters, fixed queuing guides, and waiting areas
- Maintenance of accessible elements in public spaces

Section	Regulatory Requirement	Compliance Date	Implementation	Responsible
Section 80.1 - Definitions	See Appendix A	Not applicable	Not applicable	Not applicable
Section 80.2 - Application	This part applies to public spaces that are newly constructed or redeveloped on and after the dates set out in the schedule in section 80.5	Not applicable	Reference section 80.5 below	Not applicable
Section 80.3 – Transition	Transition Where an obligated organization has entered into a contract on or before December 31, 2012 to construct or develop any public space to which this Part applies and the contract does not meet the requirements of this Part, the obligated organization is not required to meet the requirements of this Part in honouring the existing contract	Not applicable	Not applicable	Not applicable
Section 80.4 – Slope ratios	Slope ratios Not applicable	Not applicable	Not applicable to the CMPA	Not applicable

Section 80.5 - Schedule	Schedule Obligated organizations shall meet the requirements set out in this Part in accordance with the following schedule: For large organizations, January 1, 2017	January 1, 2017	The CMPA will implement requirements that are applicable within the compliance timeline	Corporate Services
Section 80.6 - Trails	Recreation Trails Applies to newly constructed and redeveloped recreational trails that an obligated organization intends to maintain, but does not apply to the following types of recreational trails: Trails solely intended for cross-country skiing, mountain biking or the use of motorized snow vehicles or off-road vehicles. Wilderness trails, backcountry trails and portage routes.	Not applicable	Not applicable to the CMPA	Not applicable
Section 80.7 – Beach access routes	Beach access Applies to newly constructed and redeveloped beach access routes that an obligated organization intends to maintain	Not applicable	Not applicable to the CMPA	Not applicable
Section 80.8 – Consultation, recreational trails	Consultation, Recreation trails Requires organizations to consult on a number of elements before they construct new or redevelop existing recreational trails	Not applicable	Not applicable to the CMPA	Not applicable
Sections 80.9 to 80.15 - Technical requirements	Technical requirements Details technical requirements for recreational trails, recreational trails, beach access routes, boardwalks, ramps	Not applicable	Not applicable to the CMPA	Not applicable
Sections 80.16 and 80.17 – Outdoor Public use eating areas	Outdoor public use eating areas Applies to newly constructed and redeveloped outdoor public use eating areas Sets out requirements for application and general requirements	January 1, 2017	 2017 and beyond When building new or making major changes to existing outdoor public eating areas, and in accordance with the <i>IASR</i>, the CMPA will ensure: At least 20 %, and no fewer than one, of the tables are accessible to people using mobility aids, such as wheelchairs The ground leading to and under the accessible tables is level, firm and stable, and 	Corporate Services

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			Enough space is clear around the accessible takes so people using a mobility aid can approach the tables	
Section 80.18 to 80.20 Outdoor play spaces	Outdoor play spaces Applies to newly constructed and redeveloped outdoor play spaces Sets out requirements for application, general requirements, consultation requirements and accessibility in design	Not applicable	Not applicable to the CMPA	Not applicable
Section 80.21 to 80.31 - Exterior paths of travel	Exterior paths of travel Applies to newly constructed and redeveloped exterior paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose and not to provide a recreational purpose. Sets out requirements for application, general obligation, technical requirements, ramps, stairs, curb ramps, depressed curbs, accessible pedestrian signals, rest areas, exceptions, limitations	January 1, 2017	2017 and beyond When building new or making major changes to existing exterior paths of travel, and in accordance with the <i>IASR</i> , the CMPA will ensure: They must follow minimum width and height requirements The slopes of sidewalks, walkways and ramps cannot exceed certain ratios, and The surfaces of ramps and stairs must be firm, stable and slip resistant	Corporate Services
Section 80.32 to 80.39 – Accessible parking	Accessible parking Applies when constructing new or redeveloping off-street parking facilities that an organization intends to maintain	January 1, 2017	2017 and beyond When building new or making major changes to existing parking facilities, the CMPA will ensure the requirements for both off-street (parking garage) and on-street parking are considered and implemented as required, as outlined in the <i>IASR</i> .	Corporate Services
Section 80.40 to 80.43 – Obtaining services	Obtaining services Applies to: All newly constructed service counters and fixed queuing guides All newly constructed or redeveloped waiting areas	January 1, 2017	2017 and beyond When building new or making major changes to existing service counters, fixed queuing guides, and waiting areas, the CMPA will ensure the requirements are considered and implemented as required, as outlined in the <i>IASR</i> .	Corporate Services
Section 80.44 – Maintenance of accessible elements	Maintenance of accessible elements of public spaces In addition to the accessibility plan requirements set out in section 4, obligated organizations shall ensure that the multi-year accessibility plans include:	January 1, 2017	 2017 and beyond In accordance with the requirements of the IASR, the CMPA will ensure the accessibility plan includes: Preventative and emergency maintenance procedures for the accessible parts of the public spaces, such as posting when regular maintenance occurs and letting people know about alternatives, and 	Corporate Services

 Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order. 	 Procedures for handling temporary disruptions in service when an accessible part of the public spaces is not working, such as posting signage explaining the disruption and outlining an alternative
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PART IV.2 – CUSTOMER SERVICE STANDARDS Sections 80.45 to 80.51

This section of the Regulation includes requirements related to:

• Scope and interpretation

- Establishment of policies
- Use of service animals and support persons
- Notice of temporary disruptions
- Training for staff, etc.
- Feedback process required
- Format of documents

Section	Regulatory Requirement	Compliance Date	Implementation Actions To Be Taken	Responsible Department(s)
Section 80.45 - Scope and interpretation	See Appendix A	Not applicable	Not applicable	Not applicable
Section 80.46 Establishment of policies	In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities. Policies are guided by the principles of dignity, independence, integration and equal opportunity Make policies publicly available and, on request, provide them in an accessible format.	January 1, 2012	Completed – Policy addressing the requirements in the Customer Service Standard (implemented prior to January 1, 2012) were later integrated into the CMPA Accessibility Policy, available on the CMPA website Completed - The CMPA Request for Information in an Accessible Format online form is available on the CMPA website	
Section 80.47 Use of service animals	Use of service animals and support persons • Allow assistive devices	January 1, 2012	The CMPA ensures that its policies, practices and procedures are consistent with the following principles:	

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and support persons	Allow service animals Welcome support persons Consider a person's disability when communicating with them		 Persons with disabilities and their service animals are accommodated in all aspects of service provision unless the animal is otherwise excluded by law from the premises, in which case the CMPA will look to other available measures to enable the person with a disability to obtain, use or benefit from the CMPA's services Persons with disabilities may use assistive devices or supports to access CMPA goods or services In a situation where the CMPA might require a person with a disability to be accompanied by a support person for health or safety reasons, the CMPA would undertake prior consultation with the person with a disability to understand their needs, consider health or safety reasons and consider alternative measures to protect the health or safety of the person or others on the premises The CMPA will ensure that employees and volunteers are trained and familiar with the various assistive devices that may be used by members with disabilities who are accessing CMPA services or other individuals who communicate with the CMPA or visit the CMPA's offices Completed – Policy addressing these requirements is included in the CMPA Accessibility Policy, available on the CMPA website 	
Section 80.48 Notice of service disruption	Notice of service disruption Inform members or the public when accessible services are temporarily unavailable	January 1, 2012	 The CMPA will give notice of the reason and date of any disruption in a facility or service usually used to allow a person with a disability to access services and provide a description of alternative facilities or services, if any, that are available Notice of service disruption will be made conspicuous and in advance, if the disruption is anticipated Completed – Policy addressing these requirements is included in the CMPA Accessibility Policy, available on the CMPA website 	
Section 80.49 Training for staff, etc.	Training ■ In addition to the requirements in section 7, ensure that training on accessible customer service and how to interact with people with different disabilities is provided to all employees, volunteers, and others who provide goods, services or facilities on behalf of organization	January 1, 2012	Reference section 7 as outlined above Completed – Policy addressing these requirements is included in the CMPA Accessibility Policy, available on the CMPA website	
Section 80.50 Feedback process	Feedback	January 1, 2012	Reference section 7 as outlined above	

	 Ensure that a process for receiving and responding to feedback on how accessible services are provided is established and is accessible to persons with disabilities by providing/arranging for accessible formats and communication supports, upon request Includes feedback from the public, employees, customers Notify the public about the availability of accessible formats and communication supports 		Completed – Policy addressing these requirements is included in the CMPA Accessibility Policy. The CMPA Accessible Services feedback online form and CMPA Accessibility Policy are both available on the CMPA website	
Section 80.51 Format of documents	Format of documents Reference section 12 as outlined above	January 1, 2016	Reference section 12 as outlined above Completed – Policy addressing these requirements is included in the CMPA Accessibility Policy. The CMPA Accessible Services feedback online form and CMPA Accessibility Policy are both available on the CMPA website	

PART V – COMPLIANCE Sections 82 to 86.1

This section of the Regulation includes information and requirements related to:

• Application and definition

• Administrative penalties for non-compliance

- Non-compliance orders, penalty payment, tribunals and commencement

Section	Regulatory Requirement	Compliance Date	Implementation Actions To Be Taken	Responsible Department(s)
Section 82 – Definition	See Appendix A	Not applicable	Not applicable	Not applicable
Sections 83 to 86	customer service). The Regulation would enable a govern (e.g. administrative oversight vs. health and safety risk), th individual). For example, penalties for individuals and un (for a contravention of major impact and a major contraver coupled with a major contravention history, the administrat	nment official – a "direct e contravention history incorporated association tion history). The rang ive penalties can be as	ards contained in the <i>IASR</i> (information and communications, employment, transportation, design of ctor" – to assess an administrative penalty based on a consideration of the severity of the impact of the organization or organization in question, and the nature of the organization (corporation, unincorporates would generally range from \$200 (for a contravention of minor impact and a minor contravention of for corporations would generally go from \$500 to \$15,000. However, in the case of contraventions are sessed on a daily basis to a maximum of \$100,000 for a corporation, and \$50,000 for an individual of the tribunal responsible for hearing matters arising under the <i>AODA</i> .	ne contravention rated association or history) to \$2,000 of major impact
Section 86.1 – Accessibility reports	Accessibility reports Organizations shall file the accessibility report required under subsection 14 (1) of the Act with a director according to the following schedule: In the case of large organizations, every three years following the report that was due on December 31, 2014	Every three years following the report that was due on December 31, 2014	 File accessibility reports within the required timeline, outlining the CMPA's progress towards becoming accessible for people with disabilities Post the report on the CMPA website Completed in Q4 2012 (Customer Service Standards) (2012 compliance report) Completed in Q4 2014 (IASR) (2014 compliance report) Completed in Q4 2017 (IASR) (2017 compliance report) Completed in Q1 2021 (IASR) (2020 compliance report) 	Executive Services and Governance

APPENDIX A

Accessibility for Ontarians with Disabilities Act, 2005 Integrated Accessibility Standards – Ontario Regulation 191/11amended by Regulation 413/12

> https://www.ontario.ca/laws/regulation/r11191 https://www.ontario.ca/laws/regulation/r12413 https://www.ontario.ca/laws/regulation/110191

Purpose and application

- 1. (1) This Regulation establishes the accessibility standards for each of information and communications, employment and transportation, the design of public spaces and customer service.
- (2) The requirements in the standards set out in this Regulation are not a replacement or a substitution for the requirements established under the *Human Rights Code* nor do the standards limit any obligations owed to persons with disabilities under any other legislation.
- (3) Except as otherwise provided in this Regulation, this Regulation applies to the Government of Ontario, the Legislative Assembly, every designated public sector organization and to every other person or organization that provides goods, services or facilities to the public or other third parties and that has at least one employee in Ontario.

Definitions

The definition of disability that appears in the *Ontarians with Disabilities Act, 2001* and in the *Accessibility for Ontarians with Disabilities Act, 2005* is the same as that which is used in the *Ontario Human Rights Code.* For the purposes of this document, the term "disability" is taken from the provincial statutes mentioned above and is defined as follows:

"Disability" means,

- any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997 ("handicap").

2. In this Regulation,

"accessible formats" may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities; ("format accessible") "barrier" is anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice ("obstacle").

- "communication supports" may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications; ("aides à la communication")
- "designated public sector organization" means every municipality and every person or organization listed in Column 1 of Table 1 of Ontario Regulation 146/10 (Public Bodies and Commission Public Bodies Definitions) made under the *Public Service of Ontario Act*, 2006 or described in Schedule 1 to this Regulation; ("organisation désignée du secteur public")
- "Government of Ontario" includes the executive of the government and operational branches, including every ministry of the Government of Ontario and the Office of the Premier; ("gouvernement de l'Ontario")
- "large designated public sector organization" means a designated public sector organization with 50 or more employees; ("grande organisation désignée du secteur public")
- "large organization" means an organization with 50 or more employees in Ontario, other than the Government of Ontario, the Legislative Assembly or a designated public sector organization; ("grande organisation")
- "Legislative Assembly" includes the Office of the Assembly, the offices of members of the Assembly, including their constituency offices and the offices of persons appointed on the address of the Assembly; ("Assemblée législative")
- "obligated organization" means the Government of Ontario, the Legislative Assembly, a designated public sector organization, a large organization and a small organization; ("organisation assujettie") "small designated public sector organization" means a designated public sector organization with at least one but fewer than 50 employees; ("petite organisation désignée du secteur public")
- "small organization" means an organization with at least one but fewer than 50 employees in Ontario, other than the Government of Ontario, the Legislative Assembly or a designated public sector organization. ("petite organisation")
 - 9. In this Part.
- "communications" refers to the interaction between two or more people or entities when information is provided, sent or received
- "conversion ready" refers to an electronic or digital format that assists conversion into an accessible format such as Braille, large print, audio cassettes, CDs, DVDs, etc.
- "information" refers to knowledge, data and facts that convey meaning and that exist in any format such as text, audio, digital or images

80.1 In this Part,

- "amenities" means items that provide conveniences or services for use by the public, examples of which include drinking fountains, benches and garbage receptacles; ("installations")
- "maintenance" means activities that are intended to keep existing public spaces and elements in existing public spaces in good working order or to restore the spaces or elements to their original condition, examples of which include painting and minor repairs; ("entretien")
- "off-street parking facilities" includes open area parking lots and structures intended for the temporary parking of vehicles by the public, whether or not the payment of a fee is charged and includes visitor parking spaces in parking facilities; ("installations de stationnement hors voirie")
- "on-street parking" includes parking spaces located on highways, as defined in subsection 1 (1) of the *Highway Traffic Act*, that provide direct access to shops, offices and other facilities whether or not the payment of a fee is charged; ("stationnement sur voirie")
- "recreational trails" means public pedestrian trails that are intended for recreational and leisure purposes; ("sentier récréatif")
- "redeveloped" means planned significant alterations to public spaces, but does not include maintenance activities, environmental mitigation or environmental restoration; ("réaménagé")
- "rest area" means, in respect of recreational trails and exterior paths of travel, a dedicated level area that is intended for public use to allow persons to stop or sit; ("aire de repos")

80.45 In this Part,

For the purposes of this Part, an animal is a service animal for a person with a disability if,

- (a) the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
- (b) the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
- (i) A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
- (ii) A member of the College of Chiropractors of Ontario.
- (iii) A member of the College of Nurses of Ontario.
- (iv) A member of the College of Occupational Therapists of Ontario.
- (v) A member of the College of Optometrists of Ontario.
- (vi) A member of the College of Physicians and Surgeons of Ontario.
- (vii) A member of the College of Physiotherapists of Ontario.
- (viii) A member of the College of Psychologists of Ontario.
- (ix) A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

82. In this Part,

[&]quot;guide dog" means a guide dog as defined in section 1 of the Blind Persons' Rights Act; ("chien-guide")

[&]quot;service animal" means an animal described in subsection (4); ("animal d'assistance")

[&]quot;support person" means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities. ("personne de soutien")

[&]quot;corporation" means any corporation with or without share capital wherever or however incorporated and includes a corporation with or without share capital that is incorporated or continued otherwise than by or under the authority of an Act of the Legislature.