

	Policy/Procedure Name:	Accessibility Policy
Manual: Administration	Number:	
Section: General Administration	Effective Date:	16 JAN 2025
Pages: 1 of 14	Revision Date:	

Purpose

The purpose of this policy is to outline practices and procedures in place at Muskoka Algonquin Healthcare (MAHC) to help identify and remove barriers that impede a person's ability to access care and services. Further, compliance with all legislated accessibility requirements is paramount.

Scope

The policy pertains to all staff and credentialed staff at Muskoka Algonquin Healthcare (MAHC).

Policy Statement

MAHC is committed to preventing, identifying and removing barriers that impede the ability of people with disabilities to access care and services. This includes patients, families, staff, credentialed staff, volunteers and members of our community. As an organization, we respect and uphold the requirements of the Accessibility for Ontarians with Disabilities Act (2005), and its associated standards and regulations. MAHC understands its responsibility for ensuring a safe, dignified and welcoming environment for everyone. The organization is committed to ensuring compliance with legislation by incorporating accessibility legislation into our policies and practices regularly. We will strive to meet the needs of individuals with disabilities in a timely and effective manner. Providing an accessible and barrier-free environment is a shared effort, and as an organization, MAHC is committed to working with all parties to make accessibility for all a reality.

Background

In June 2005, the Ontario government passed the Accessibility for Ontarians with Disabilities Act (AODA). The purpose of this enhanced Act is to develop, implement and enforce standards of accessibility for all Ontarians. MAHC's Accessibility Policy is consistent with the AODA, the Accessibility Standards for Customer Service, and the Integrated Accessibility Standards (O. Reg. 191/11) passed on July 1, 2011.

These regulations set accessibility standards related to customer service, information and communication, employment, transportation and the design of public spaces. All public sector organizations, including MAHC, are required to comply with the requirements as applicable. All people, regardless of disability, have equal right of access to all goods, services and facilities provided by MAHC. MAHC is committed to:

1. Providing goods, services and facilities in a manner that:
 - i. Maintains the dignity, autonomy, respect, privacy and safety of persons with disabilities; and
 - ii. Is inclusive, sensitive and responsive to unique needs.

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2. Integration and equal opportunity;
3. Preventing and removing barriers to accessibility; and
4. Meeting the standards set out under the Accessibility for Ontarians with Disabilities Act, 2005.

Definitions

Accessibility: The term accessibility means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product or environment.

Assistive Devices and Measures: Assistive devices and measures are supports to improve access to care for persons with disabilities. For example, wheelchairs, volunteers, real-time captioning services (on-screen typing of what speakers are saying), sign language interpreters or deaf-blind interveners. Other examples include text, and Telephone Teletypes (TTY) to communicate with clients who are deaf, deafened, hard of hearing, have speech impairments or are deaf-blind (Guide to the Accessibility Standards for Customer Service, Ontario Regulation). During the pandemic, MAHC also provided clear face masks to enable lip reading.

Barrier: Barriers are obstacles that limit access and prevent people with disabilities from fully participating in society. Most barriers are not intentional. Barriers usually arise because the needs of people with disabilities are not considered from the beginning.

Disability: According to the Ontario Human Rights Code, a "Disability" is defined as:

- i. 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,
- ii. A condition of mental impairment or a developmental disability,
- iii. A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- iv. A cognitive disorder, or
- v. An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

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The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities whereby the effects of which may come and go. This definition describes common disabilities and is not considered exhaustive.

Emotional Support Animals: Emotional support animals provide comfort and security; however, they do not have training for specific tasks. Therefore, emotional support animals do not formally qualify as service animals under the AODA. At MAHC, an Emotional Support Animal will be considered a “service animal” if the patient/visitor provides documentation from a regulated health professional confirming that the person requires the animal for reasons relating to the disability, provides documented proof of vaccination and training, and is permitted at the discretion of the unit manager or delegate based on a risk analysis.

Personal Assistive Devices: For the purpose of this policy, Personal Assistive Devices are personal supports used by persons living with disabilities that enable them to carry out the activities of daily living and support access to services. Patient-owned equipment such as power-mobility devices (power wheelchairs or scooters) are regarded as Personal Assistive Devices.

Service Animals: Any animal individually trained to assist people with disabilities in the activities of living, to enhance quality of life, and mitigate their disabilities. These animals provide persons living with disabilities a variety of services, including but not limited to:

- i. Guiding individuals with visual impairments
- ii. Alerting individuals who are deaf, deafened or hard of hearing to sounds
- iii. Alerting to seizures
- iv. Opening/closing doors
- v. Retrieving items
- vi. Pulling a wheelchair

Most service animals are dogs and can be of any breed or size. A service animal is afforded access to all places the public is invited when accompanying their human partner. A service animal is not considered a “pet” because it is specially trained to help a person manage their disability or used to minimize the impacts of the disability.

Support Person: A "Support Person" accompanies a person living with a disability to assist with communication, mobility, personal care or medical needs or with access to goods or services. Medical needs may include, but are not limited to, monitoring an individual’s health or providing medical support by being available in the event of a seizure. A Support Person may be a paid professional, a volunteer, family member or friend of the person with a disability (Guide to the Accessibility Standards for Customer Service, Ontario Regulation).

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STANDARDS OF ACCESSIBILITY UNDER AODA

Customer Service: Service delivery to the public; also includes business practices, employee training.

Transportation: This standard needs to reflect a variety of environments, financial capabilities of users/providers and the differing modes of travel including conventional and specialized modes, and on-demand taxi services.

Information and Communication: Information and communications provided to the consumer or end-user through print, telephone, electronic devices, and in person; also includes publications and software applications.

Design of Public Spaces: Access to, from and within buildings and outdoor spaces; also includes counter heights, aisle and door widths, parking, signage, pedestrian access routes and signal systems.

Employment: Hiring and retaining employees; also includes employment practices, policies and processes such as job advertisements and interviewing.

PRINCIPLES OF CUSTOMER SERVICE

Dignity: Refers to policies, procedures and practices that treat a person with a disability as a client who is as valued and deserving of effective and full service as any other client. They do not treat people with disabilities as an afterthought or force them to accept lesser service, quality or convenience. Service delivery needs to take into account how people with disabilities can effectively access and use services and show respect for these methods.

Independence: In some instances, independence means freedom from control or influence of others' freedom to make their own choices. In other situations, it may mean the freedom to do things in their own way. People who may move or speak more slowly should not be denied an opportunity to participate in a program or service because of this factor.

Integration: Integrated services are those services that allow people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other clients. Integration means that policies, practices and procedures are designed to be accessible to everyone including people with disabilities. Sometimes integration does not serve the needs of all people with disabilities. In these cases, it is necessary to use alternate measures to provide goods or services. Alternate measures are ways of serving people that are not completely integrated into the regular business activities of the organization, for example, email.

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Equal Opportunity: Equal opportunity means having the same chances, options, benefits and results as others. In the case of services, it means that people with disabilities have the same opportunity to benefit from the way you provide services as others. They should not have to make significantly more effort to access or obtain service. They should also not have to accept lesser quality or inconvenience.

Procedure & Compliance

MAHC will ensure we are identifying, preventing and removing barriers to access for people living with disabilities through procedures in the following areas:

General Procedures

1. Enabling and accommodating people living with disabilities to access our goods and to utilize our services.
2. Communicating with a person with a disability in a manner that takes into account their disability and communication preference.

Formatting of Documents

3. When providing a copy of a document to a person with a disability, MAHC shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support.
 - i. In a timely manner that takes into account the person’s accessibility needs due to disability, and
 - ii. At a cost that is no more than the regular cost charged to other persons
4. MAHC shall consult with the person making the request in determining the suitability of an accessible format or communication support.

Support Persons, Service Animals and Assistive Devices

Supports and encourages the presence and use of accessibility Support Persons, service animals and assistive devices are embraced with consideration taken for infection control and patient safety.

5. Allowing people living with disabilities to bring their guide dog or service animal with them to areas of the premises that are open to the public.
6. Permitting people living with disabilities who use a Support Person to accompany them and ensuring that a person living with a disability has access to their Support Person while on our premises.
7. Encouraging people living with disabilities to use their own personal assistive devices to improve access to MAHC’s goods and services.

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Training

8. MAHC is committed to training all staff and volunteers in accessible customer service, other Ontario’s accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, MAHC will train:

- i. All persons who participate in developing the organization’s policies; and
 - ii. All other persons who provide goods, services or facilities on behalf of the organization
9. Training of our employees and volunteers on accessibility relates to their specific roles. Training includes:
 - i. Purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards.
 - ii. Our policies related to the Customer Service Standards
 - iii. How to interact and communicate with people with various types of disabilities
 - iv. How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
 - v. How to use the equipment or devices available onsite or otherwise that may help with providing goods, services or facilities to people with disabilities. These include:
 - Wheelchairs
 - Texting software
 - Electronic devices used to enable translation, or amplification of sound
 - What to do if a person with a disability is having difficulty in accessing our organization’s goods, services or facilities.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies. We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

At minimum, bi-annual training is also assigned through the online Learning Management System (LMS) software. Or, if changes occur it will be assigned upon revision.

Informing Employees of Supports

10. MAHC shall inform its employees of its policies used to support its employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee’s accessibility needs due to a disability. O. Reg. 191/11, s. 25 (1)
11. MAHC shall provide the information required under this section to new employees as soon as practicable after they begin their employment. O. Reg. 191/11, s. 25 (2)

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12. MAHC shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability. O. Reg. 191/11, s. 25 (3)

Documenting Individual Accommodation Plans

13. MAHC shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. O. Reg. 191/11, s. 28 (1). The process for the development of documented individual accommodation plans shall include the following elements:

- i. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- ii. The means by which the employee is assessed on an individual basis.
- iii. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer’s expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
- iv. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
- v. The steps taken to protect the privacy of the employee’s personal information.
- vi. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- vii. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- viii. The means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs due to disability. O. Reg. 191/11, s. 28 (2).

Individual accommodation plans shall,

- a. if requested, include any information regarding accessible formats and communications supports provided, as described in Informing Employees of Supports (above)
- b. if required, include individualized workplace emergency response information, and
- c. identify any other accommodation that is to be provided. O. Reg. 191/11, s. 28 (3).

Performance Management

14. In respect to performance management of its employees, MAHC shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities. O. Reg. 191/11, s. 30 (1).

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- “performance management” means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success. O. Reg. 191/11, s. 30 (2).

Career Development and Advancement

15. In the provision of career development and advancement for its employees, MAHC shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities. O. Reg. 191/11, s. 31 (1).

- “career development and advancement” includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them. O. Reg. 191/11, s. 31 (2).

Redeployment

16. As part of our redeployment strategy, MAHC shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities. O. Reg. 191/11, s. 32 (1).

- “redeployment” means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization. O. Reg. 191/11, s. 32 (2).

Notice of Accessible Service Interruption

17. MAHC will provide notice when facilities or services that people living with disabilities rely on to access our services are temporarily disrupted. In the event of a planned service disruption, notification will be provided in advance or as soon as possible. When necessary, appropriate alternative services will be provided. In the event of unplanned service disruption, notification will be provided as soon as possible after the disruption occurs. When necessary, appropriate alternative services will be provided. Notices of disruption shall be made publicly available as appropriate (e.g. MAHC website, social media channels) and shall include:

- The name of the event/service;
- The normal service location being impacted;
- Alternate service locations;
- Alternate service methods;

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- v. Hours of service availability;
- vi. Contact information; and
- vii. Any other information deemed appropriate to deliver a good or service.

Encouraging Feedback

18. MAHC encourages and responds to feedback from patients/families, staff, physicians and volunteers. The hospital accepts feedback in a variety of formats, including email, telephone, mail and in person. In addition, MAHC will ensure:

- i. Communication supports are available to facilitate the feedback process upon request.
- ii. Every staff member is attentive to the concerns of patients/residents, their families and visitors and to resolve concerns related to accessibility. There are a number of strategies that are available to patients/ families/ staff, physicians and volunteers to provide feedback regarding accessibility.
- iii. All information provided through our feedback process is available in accessible formats upon request. Upon being advised of a need for documents in accessible formats or communication supports, MAHC will work with the individual making the request to determine the most appropriate format or communication support. Where information cannot be converted to the format requested, MAHC will provide an explanation of the problem and a summary of the information.

Concerns related to accessibility shall be reported to Patient Relations and managed in accordance with applicable policies.

As part of a website redesign completed in 2012, MAHC meets Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

Accessibility Committee and Accessibility Plan

19. MAHC, in consultation with persons living with disabilities, will establish and maintain a multi-year Accessibility Plan.
- i. This plan will be reviewed and updated at least once every five (5) years.
 - ii. Each year, MAHC will prepare a status report of the measures taken to implement the strategies set out in the multi-year accessibility plan.
 - iii. Both the multi-year Accessibility Plan and the annual status reports will be made publicly available through the MAHC website.

Procurement

20. MAHC considers accessibility when making decisions relating to the procurement or acquisition of goods, services, equipment, devices and facilities.

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21. In particular, MAHC will incorporate accessibility features when designing, procuring or acquiring self-service kiosks.

Hiring and Recruitment

22. Ensuring that all open positions are recruited for in an inclusive manner, ensuring equal consideration and that accommodation is available in accordance with the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005

MAHC includes the following language in job postings:

“MAHC is committed to a selection process and work environment that is inclusive and barrier free. We encourage applicants from all equity-deserving groups, including but not limited to, individuals who identify as Indigenous, racialized, seniors, persons living with disabilities, women, and those who identify as 2SLGBTQ.

Accommodations will be provided in accordance with the Ontario Human Rights Code. Applicants need to make any accommodation requests for the interview or selection process known in advance by contacting the Human Resources Department. Human Resources will work together with the hiring committee to arrange reasonable and appropriate accommodation for the selection process which will enable you to be assessed in a fair and equitable manner.”

Accessible formats and communication supports for employees

23. Where an employee with a disability so requests it, MAHC shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,

- i. information that is needed in order to perform the employee’s job; and
- ii. information that is generally available to employees in the workplace. O. Reg. 191/11, s. 26 (1).

24. MAHC shall consult with the employee making the request in determining the suitability of an accessible format or communication support. O. Reg. 191/11, s. 26 (2).

Workplace emergency response information

25. MAHC shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee’s disability. O. Reg. 191/11, s. 27 (1).

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26. If a MAHC employee who receives individualized workplace emergency response information requires assistance and with the employee’s consent, MAHC shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee. O. Reg. 191/11, s. 27 (2).
27. MAHC shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee’s disability. O. Reg. 191/11, s. 27 (3).
28. MAHC shall review the individualized workplace emergency response information,
- i. When the employee moves to a different location in the organization;
 - ii. When the employee’s overall accommodations needs or plans are reviewed; and
 - iii. When the employer reviews its general emergency response policies. O. Reg. 191/11, s. 27 (4).

Notes

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References / Relevant Legislation

1. [Accessibility for Ontarians with Disabilities Act, 2005](#)
2. [Guide to the Accessibility Standards for Customer Service, Ontario Regulation](#)

Appendices

Appendix 1 – Document Consultation & Approval Tracking Record

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Appendix 1 – Document Consultation & Approval Tracking Record



Document Consultation & Approval Tracking Record

Document Title: Accessibility Policy

Document Status:

- New
- Revision of Existing
- Reviewed, no edits required

Document Type:

- Policy/Procedure
- Protocol/Guideline
- Standard Operating Procedure
- Medical Directive
- Order Set
- Other: _____
- Clinical Pathway
- Order Set
- Standard of Care
- Rules & Regulations
- Form

Development Team (list the names and designations of those involved in the development/review of the document):

Name	Designation
Diane George	VP Integrated Care, Patient Services & Quality
Charity Klingenberg	EA to People
Leanne Gray	Director, Human Resources

Scope of Document:

- Department specific
- Two or more departments/services
- Corporate/Hospital-wide

Groups Impacted by Document:

- Nursing
- Credentialed Staff
- Clerical/Support Staff
- Administration
- All Staff/Credentialed Staff
- Allied Health (specify):
- Support Staff (specify):
- Other (specify):

Consultation Phase (list below the stakeholders/committees that will provide feedback and input into the document prior to submission to the Signing Authority for final approval):

Stakeholder/Committee	Date Consulted	Feedback/Comments	Development Team Response
Accessibility Committee	15 APR 2024	The new drafted policy was reviewed by the committee and updates were made collectively. Revised draft to be circulated to the committee for final review.	
	13 JUNE 2024	Senior friendly	

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		references have been moved to a dedicated policy	
	12 SEPT 2024	Parts referring to employees extracted different policy LMS training changed from bi-annual to annual	
Patient & Family Advisory Council	14 NOV 2024	What is the training that is required for an emotional support dog? Service dogs have formal training, how will MAHC ensure the emotional support animal will be trained to stay within a room (needs taken care of food, bathroom etc.) – as this can pose a risk to roommates, other patients and staff	Response shared to PFAC admin; does not require edits to draft policy
MAHC Leadership Team	17 DEC 2024	No feedback received	

Education & Communication Plan: (select all that apply)

<i>Tool(s) / Method(s)</i>	<i>Timeline for Completion</i>	<i>Lead Responsible</i>
<input type="checkbox"/> Huddles/Staff meetings		
<input type="checkbox"/> Education Blitzes		
<input checked="" type="checkbox"/> Learning Management System (LMS) Module	Accessible Ontario service module exists	
<input type="checkbox"/> Posters		
<input type="checkbox"/> Electronic Mail		
<input type="checkbox"/> Communication Binder		
<input type="checkbox"/> Department Meetings		
<input type="checkbox"/> Frequently Asked Questions (FAQ)		
<input checked="" type="checkbox"/> Memo	January 2025	
<input type="checkbox"/> MAHC Moments		
<input type="checkbox"/> Other:		

Approval Phase (for list of Signing Authorities, view the “Policy, Procedure and Guideline Development” policy):

Signing Authority:

Senior Leadership Team

Date Review:

January 16, 2025



Approved



Not Approved

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1. Category (manual/section):	Administration/General Administration
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