

Human Resources

SECTION	SUBJECT	POLICY #		
		HR 01-01-91		
		YY	MM	DD
THE ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA), 2005	Integrated Accessibility Standards Requirements (IASR)	2013	10	28

Accessibility Statement of Commitment

Universal Care is committed to making its owned and managed Long Term Care and Retirement Homes accessible to individuals with disabilities by compassionately caring for our residents, patients and staff and meeting or exceeding the standards set out in the Accessibility for Ontarians with Disabilities Act, 2005.

This commitment will be integrated wherever possible and will ensure that persons with disabilities will benefit from same services and quality available to our residents, staff, volunteers, visitors and contractors without disabilities.

Background

In 2005, the Government of Ontario passed the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). Its goal is to make Ontario accessible by 2025.

Accessibility standards are being created as part of the AODA. These standards are rules that businesses and organizations in Ontario need to follow to identify, remove and prevent barriers so that people with disabilities will have more opportunities to participate in everyday life.

The Accessibility Standards under AODA are:

- **Customer Service** – Provide accessible customer service to people with disabilities, the first standard to become law as a regulation.
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- **Information and Communications** – Create, provide and receive information and communications in ways that are accessible to people with disabilities
- **Employment** – Incorporate accessibility practices across all stages of employment including recruitment, selection and supporting regional employees with disabilities
- **Transportation** – Make it easier to move around the Region by considering the accessibility needs of people with disabilities
- **Built Environment** – Make regional facilities and outside spaces more accessible

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The “Integrated Accessibility Standards Regulation” has four areas of focus:

- General Requirements which applies to all three Standards
- Information and Communications
- Employment
- Transportation

DEFINITIONS

“Disability” - according to the Accessibility for Ontarians with Disability Act 2005 means that:

(a) 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 coordination, 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^{4,5}

(b) A condition of mental impairment or a developmental disability^{4,5}

(c) A learning disability, or a dysfunctional in one or more of the processes involved in understanding or using symbols or spoken language^{4,5}

(d) A mental disorder^{4,5}

(e) An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety or Insurance Act, 1997*; (“handicap”) ⁴

Any degree of physical disability may include, but not limited to:

- Diabetes mellitus
- Arthritis
- Epilepsy

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- A brain injury
- Any degree of paralysis
- Amputation
- Lack of physical coordination
- Blindness or partial visual loss
- Deafness or hard of hearing
- Both blind and deaf
- Muteness or speech impediment;
- A condition of mental impairment or a developmental disability.
- A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
- A mental disorder.
- Breathing problems and use of O2
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety & Insurance Act, 1997.

“Customer” - any member of the public who has access to an organization’s goods, services or premises.

“Blind person” - means a person who because of blindness is dependent on a guide dog or white cane;

“Service animal” - if it is readily apparent that the animal is used by a person with a disability for reasons relating to his or her disability, i.e. a guide dog wearing a harness.

“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 or services. Also note that, in use of Support Persons, if a participant fee is charged (e.g. admission or registration fee) departments must clearly post advance notice of the amount, if any, payable by the accompanying Support Person(5).

A **“barrier”** - anything that prevents a person with a disability from fully participating in all aspects of society because of his/her disability. A barrier can be physical or due to

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architectural design. Sometimes the way we communicate causes barriers, as can attitude, technology and policies and practices. Accessibility planning helps prevent, identify and remove those barriers.

“Accessible Formats” - formats that are an alternative to standard print and are accessible to people with disabilities. . Accessible formats may include, but are not limited to accessible electronic audio format such as DVDs, CDs, Braille, text transcripts, large print, recorded audio, and other formats accessible to persons with disabilities.

“Self Service Kiosk” – an interactive electronic terminal, including a point of sale device, intended for public use, and allows users to access one or more services or products or both; UniversalCare and its owned and managed homes shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

“Accessibility Plan” – a document approved by UniversalCare, Board of Directors and UniversalCare-AODA Council; such plan identifies and removes barriers to allow people with disabilities to access the services, policies, procedures and practices available within UniversalCare and owned and managed Homes; the plan meets the requirements under the enacted Standards of AODA and is made available to the public.

“Accessibility Standard” – is the rule under AODA that persons and organizations shall follow to identify, remove and prevent barriers to accessibility of services, policies, procedures and practices.

“Web Content Accessibility Guidelines” – the World Wide Web consortium, dated December 2008 and entitled “Web Content Accessibility Guidelines (WCAG) 2.0.

“Communications” - the term communications as it used in the Information and Communications Standard refers to the interaction between two or more people or entities when information is provided, sent or received.

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“Communication supports” - supports that individuals with disabilities may need to access information. Some examples include plain language formats, sign language, as well as reading out loud, captioning, or using written notes to communicate.

“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” - the term information as it is used in the Information and Communications Standard refers to knowledge, data and facts that convey meaning and that exist in any format such as text, audio, digital or images.

“As Soon As Practicable” - means as soon as possible given all of the circumstances after a person with a disability asks for the information in an accessible format or with communication supports.

PURPOSE

The Integrated Accessibility Standard Requirements (IASR) developed under the Accessibility of Ontarians with Disabilities Act, 2005 (AODA) is an overarching policy and comprises:

- General Standards
- Information and Communication Standards
- Employment Standards
- Transportation Standards (IASR, O. Reg. 191/11)

This policy is in connection with Accessibility Standards for Customer Service, Ontario Regulation (429/07, 2007), also developed under AODA. (See CUSTOMER SERVICE STANDARD (Ontario Regulation 429/07) - HR 01-01-92).

POLICY

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It is the policy of UniversalCare and the owned and managed Homes to respect and comply with The Integrated Accessibility Standards Regulation which establishes accessibility standards and introduces requirements for Information and Communications, Employment and Transportation.

This policy applies to all the organizations' staff who deal with the public or other third parties, as well as persons involved in developing the organization's policies, procedures and practices pertaining to the provision of goods and services to the public or other third parties, whether they do so as employees, volunteers, agents or otherwise. This policy also applies to physicians, volunteers, students and all others who have a working relationship with the Home(s) and the working relationship is consistent with the principles of independence, dignity, integration and equality of opportunity as set out in the Accessibility Standards for Customer Service, Ontario Regulation 429/07 (2007).

GUIDELINES

Accessibility Multi-Year Plan

UniversalCare and the owned and managed Homes Multi-year Accessibility Plan outlines the commitment to identify, remove and prevent barriers, as well as meeting the requirements under AODA.

Accessibility Multi-Year Plan is a living document and will be:

- Reviewed yearly for compliance
- UniversalCare will post an annual Status Report on the progress of removing the barriers identified and measures taken to implement the Accessibility Multi-Year Plan
- Updated every 5 years
- Made public by posting it in a visible place, and on the website
- Upon request will be provided to any customer requesting it and in an accessible format, based on the need of the customer
- The revision and the updating will be done with feedback from UniversalCare, owned and managed Homes and UniversalCare-AODA Council

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- The Accessibility Multi-Year Plan will be approved by UniversalCare-AODA Council, UniversalCare and the Board(s) of Directors

Procurement/Self Service Kiosks: UniversalCare shall incorporate accessibility features when designing, procuring or acquiring goods, services and self-service kiosks.

Emergency Information

UniversalCare and managed and owned Homes will provide to Emergency Procedures, plans or public safety information in an accessible format or with appropriate communication supports, as soon as practicable and upon request. This may include evacuation procedures and floor plans, information about alarms or information about other incidents that may threaten life, property, operations or the environment.

Workplace Emergency Response Information

UniversalCare and the owned and managed Homes 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.

If an employee who receives individualized workplace emergency response information requires assistance and with the employee’s consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee. UniversalCare and owned and managed Homes administration (the employer) shall provide the information required as soon as practicable after the employer becomes aware of the need for accommodation due to the employee’s disability.

UniversalCare and owned and managed Homes administration (the employer) shall review the individualized workplace emergency response information,

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- when the employee moves to a different location in the organization;
- when the employee’s overall accommodations needs or plans are reviewed; and
- when the employer reviews its general emergency response policies.

(Integrated Accessibility Standards Regulation (IASR) Section 27. (1))

Training

Training will be provided on the requirements of the Accessibility Standards referred to in the Integrated Accessibility Standards and on the Human Rights Code as it pertains to persons with disabilities to,

- all employees, and volunteers;
- all other persons who provide goods, services or facilities on behalf of the organization.
- third party contractors

Each organization under the umbrella of UniversalCare will keep records of the training and the attendance. The training will be done upon hire, annually thereafter and at request.

If any changes are made to the policies, procedures and practices, the training content will also be revised and will be provided to employees, volunteers, all other persons who provide goods, services or facilities on behalf of the organization and third party contractors.

Feedback

UniversalCare has processes in place for receiving and responding to feedback and will ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.

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This will allow that the feedback processes are available to people with disabilities in accessible formats or with appropriate communication supports, on request and will notify the public.

Accessible Formats and Communication Supports

UniversalCare and managed and owned Homes, upon request will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities. This will be performed in a timely manner that takes into account the person's accessibility needs due to disability and where applicable at a cost that is no more than the regular cost charged to other persons without disabilities.

Website and Web Content

Websites and internet websites controlled directly UniversalCare, or through a contract relationship that allows for modification, will confirm to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA (in accordance with the Information and Communication Standard).

Employment

UniversalCare, owned and managed and Homes will create a working environment that respects the requirements set out in the Employment Standard and Ontario Human Rights Code to accommodate people with disabilities.

This will apply to recruitment policies, procedures and processes, performance management, return to work, redeployment, career development and individual accommodation plans.

Continuous Quality Improvement

Revision of the program will be reviewed annually for the content and the effectiveness. This will include:

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- Policies and Procedures
- Accessibility Multi-Year Plan
- Feedback (Resident/Employee Survey)

Revision Date	Related Policies and Procedures
Day/Year/Month	CUSTOMER SERVICE STANDARD (Ontario Regulation 429/07)-HR 01-01-92
20/2014/06	UniversalCare - Accessibility for Ontarians with Disability Council- HR 01-01-95- CQI 01-21

UniversalCare AODA Compliance Timeline and Multi-Year Accessibility Plan (6 Year Plan)

Accessibility Statement of Commitment

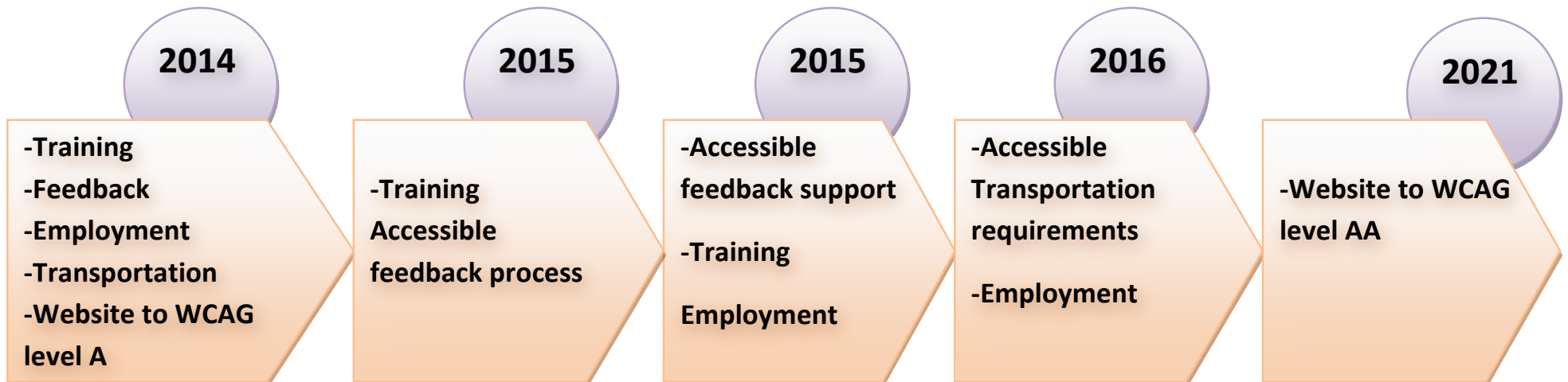
Universal Care is committed to making its owned and managed Long Term Care and Retirement Homes accessible to individuals with disabilities by compassionately caring for our residents, patients and staff and meeting or exceeding the standards set out in the Accessibility for Ontarians with Disabilities Act, 2005.

This commitment will be integrated wherever possible and will ensure that persons with disabilities will benefit from same services and quality available to our residents, staff, volunteers, visitors and contractors without disabilities.

Pathway to excellence in achieving the Multi-year Accessibility Plan Aim:

This multi-year Accessibility Plan is developed in accordance with the Integration Accessibility Standards Regulation under the *Accessibility for Ontarians with Disabilities Act, 2005*. It incorporates the intentions UniversalCare has to meet its obligations under the *Ontarians with Disabilities Act, 2001*. The Plan describes the measures that UniversalCare took, or will take over the six year period from 2012-2018 to identify, remove and prevent barriers to people with disabilities including staff, residents, volunteers, third party contractors, visitors. The plan will be guided by the UniversalCare - Accessibility for Ontarians with Disability Council.

UniversalCare and the owned and managed Homes are working towards meeting AODA requirements, both presently and in the future. The timeline below shows the upcoming requirements from the Province, with ultimate goal to make Ontario accessible.



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UniversalCare Accessibility for Ontarians with Disability Council with representation from each Home, corporate staff, managers, front line staff, volunteers, resident and family from owned and managed homes worked towards developing the Multi-year Accessibility Plan to meet the requirements under Integrated Accessibility Standards Regulation (IASR) and The Accessibility for Ontarians with Disabilities Act (AODA). The following table highlights the requirements and the planned actions with the respective timelines.

A “**barrier**” is anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. A barrier can be physical or due to architectural design. Sometimes the way we communicate causes barriers, as can attitude, technology and policies. Accessibility planning helps prevent, identify and remove those barriers

CUSTOMER SERVICE STANDARD	
Report on measures taken in 2012-2013	
Requirement	Action - Provide accessible customer service to people with disabilities
Assistive Devices	UniversalCare and the owned and managed Homes will ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods or services. (Completed)
Communication	We will communicate with people with disabilities in ways that take into account their disability. (Completed and ongoing)
Service animals	We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public. (Completed and ongoing)
Support persons	A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises. <ul style="list-style-type: none"> • Fees will not be charged for support persons (Completed and ongoing)

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<p>Notice of temporary disruption</p>	<p>In the event of a planned or unexpected disruption to services or facilities for customers with disabilities:</p> <ul style="list-style-type: none"> • Elevator • Telephone • Meal delivery • Accessible doors malfunction • Mechanical lifts • No assistive devices available • Electrical beds malfunction <p>UniversalCare will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.</p> <p>The notice will be placed at:</p> <ul style="list-style-type: none"> • Reception (where available), • Family/Residents Communication Board • Communication Centre/Nursing Station <p>(Completed and ongoing)</p>
<p>Training</p>	<p>UniversalCare will provide training to employees, volunteers and others who deal with the public or other third parties on our behalf.</p> <p>Individuals in the following positions will be trained:</p> <ul style="list-style-type: none"> • Senior Managers • Registered Dieticians • Attending Physicians/RN/EC • Pharmacy • UniversalCare Staff • Administrator/General Manager <p>This training will be provided to staff within 30 days from hiring and yearly thereafter.</p> <p>Training will include:</p> <ul style="list-style-type: none"> • An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and

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	<p>the requirements of the customer service standard</p> <ul style="list-style-type: none"> • UniversalCare’s owned/managed Home plan related to the customer service standard. • How to interact and communicate with people with various types of disabilities • How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person • How to use the TTY, wheelchair lifts, available on-site or otherwise that may help with providing goods or services to people with disabilities • What to do if a person with a disability is having difficulty in accessing UniversalCare’s owned/managed Home goods and services • Staff will also be trained when changes are made to UniversalCare accessible customer service plan. <p>(Completed and ongoing)</p>
<p>Feedback process</p>	<p>Customers who wish to provide feedback on the way UniversalCare provides goods and services to people with disabilities can e-mail, verbally, suggestion box, feedback card, by mail.</p> <p>All feedback, including complaints, will be directed to the Administrator</p> <p>Customers can expect to hear back within 10 days</p> <p>(Completed and ongoing)</p>
<p>Modifications to this or other policies</p>	<p>Any policy of UniversalCare that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.</p> <p>(Completed and ongoing)</p>

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GENERAL	
Requirement	Action Plan
January 1, 2014	
Accessibility Policies and Procedures	UniversalCare and the owned/managed Homes will: Review Policies and Procedures in place Create any new Policies and Procedures to comply with AODA and IASR
Training on the IASR and Human Rights Code	UniversalCare and the owned/managed Homes will: Revise and update present education and training material to comply with AODA and IASR. Develop, deliver and monitor training on the IASR and Human Rights Code for all managers, employees, volunteers, third party contracted services that are providing services to any of the locations owned or managed by UniversalCare.
Time lines and activities	UniversalCare and the owned and managed Homes will: Implement the UniversalCare-AODA Council to review, strategize and make recommendations based on AODA and IASR Standards. Ensures that there is front line staff, resident and family representative at UniversalCare-AODA Council meetings. Strategy meeting to identify any new barriers and opportunities to overcome the barriers.
INFORMATION AND COMMUNICATION REQUIREMENTS	
Requirement	Action Plan
January 1, 2014	
Accessible feedback process	UniversalCare and the owned and managed Homes will: Review current feedback processes to make sure that the way people offer feedback about programs and services is accessible, with accessible formats to people with

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	<p>disabilities, or communication supports available upon request</p> <p>Include opportunities for improvement in future customer service initiatives</p> <p>Inform staff and the public about the availability of accessible feedback processes</p>
<p>Accessible formats and communication supports</p>	<p>UniversalCare and the owned and managed Homes will:</p> <p>Establish corporate standards to provide accessible formats of information or communications supports, upon request</p> <p>Develop guidelines to help staff achieve these corporate accessible information standards</p> <p>Inform managers, staff, volunteers, third party contracted services and the public about the availability of information in accessible formats or with communication supports, upon request</p> <p>Ask the person requesting the information, what are the accessible formats for communication</p>
<p>Accessible websites and web content: New websites and web content to WCAG 2.0 Level A</p>	<p>UniversalCare and the owned and managed Homes will:</p> <p>Develop a strategy to ensure new websites created after January 1, 2014 and web content on those sites conform to WCAG 2.0 Level A*</p> <p>Inform staff about the accessibility standards and features on the websites</p>
<p>Language barriers</p>	<p>UniversalCare and the owned and managed Homes will:</p> <p>Identify interpreter services that are available in the community</p> <p>Keep an update roster of the language bank spoken within corporate and the owned/managed Homes</p>
<p>Increase messaging with residents within owned and managed Homes</p>	<p>UniversalCare and the owned and managed Homes will:</p> <p>Identify volunteers and support one on one interaction with residents during transition periods, such as admission and readmission</p> <p>Large maps and effective signs</p> <p>Residents: use pictorial messaging</p>

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January 1, 2018	
Accessible formats and communication supports	<p>UniversalCare and the owned and managed Homes will:</p> <ul style="list-style-type: none"> Educational libraries Increase use of pictorial signs Visitors hotline Audible elevators Sign language education TTYs with large visual displays Braille communications in elevators
EMPLOYMENT	
Requirement	Action Plan
January 1, 2014	
Accessible employment practices, Recruitment, Assessment or Selection Process	<p>UniversalCare and the owned and managed Homes will:</p> <p>Review and make necessary changes to employment policies and processes to provide: Accommodation to the needs of its employees with disabilities as required under the Ontario Human Rights Code.</p> <p>Accommodations in the recruitment, assessment and selection process</p> <ul style="list-style-type: none"> • Employee supports • Return-to-work processes with accommodation plans (this will not replace, hinder or override the return to work process under WSIB (Workplace Safety Insurance Act, 1997) or any other statute) • Performance management, career development and redeployment • Accommodations in the performance management: continuing to consider the accessibility needs of employees with disabilities when performing performance

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	<ul style="list-style-type: none"> • reviews, and/or career development, advancement and redeployment of employees • Inform managers, staff and applicants for employment about employment policies that provide supports to persons with disabilities • Inform employees of any changes to policies for accommodating employees with disabilities. <p>Ensure that applicants for employment:</p> <ul style="list-style-type: none"> • Are notified when they are individually selected to participate in the assessment or selection process and • That accommodation for disabilities is made available upon request in relation to the materials or processes to be used. • Appropriate accommodation will be identified • When presenting offers of employment, the potential employee will be notified of policies, procedures and practices to employees with disabilities.
January 1, 2015	
Accessible employment practices	<p>UniversalCare and the owned and managed Homes will:</p> <ul style="list-style-type: none"> • Leadership roles for diverse population • Partnerships with community organizations, high schools, colleges and universities • Attend career fair(s)
January 1, 2015	
Recruitment, Assessment or Selection Process	<ul style="list-style-type: none"> • Review Policies, Procedures and Practices regarding staff recruitment and modify to meet the requirements under IASR Employment standard <p>consult with individuals who request accommodations and will provide for appropriate accommodations.</p>

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TRANSPORTATION	
Requirement	Action Plan
January 1, 2014	
Service disruptions	<p>UniversalCare and the owned and managed Homes will: Establish an internal operating procedure to make available alternate accessible arrangements to transfer people with disabilities to their programmed activity destination(s) (Completed) Review:</p> <ul style="list-style-type: none"> • Pre-board and on-board announcements and emergency procedures • Emergency preparedness • General responsibilities for Staff, residents and driver • Lifting devices • Storage of mobility aids • Non functional equipment and process for repair/replacement • Protocol for Trans-Help or equivalent, to meet and drop off residents • Pick-up and drop-off from Dialysis unit
Development of accessible design criteria to be considered in the construction, renovation	Renovations, redevelopments will keep into account the accessibility to goods and services <ul style="list-style-type: none"> • Accessible washrooms, activity/lounge areas
Policies and Procedures	Review Visitor Policy and Procedure
January 1, 2021	
Accessible Websites and Web Content	WCAG 2.0 Level AA, as required by the IASR, by January 1, 2021, as practicable, except for the exclusions set out in the IASR Standard (excluding live captioning and audio description) s.14