

CORPORATE MANUAL

TITLE: Accessibility Policy	NUMBER: 2-417
SECTION: Admissions	RESPONSIBLE DISCIPLINES: All Staff, Physicians and volunteers
DATE: 2009	APPROVED BY: Director of Capital Redevelopment
REVIEW FREQUENCY: Every 3 years	Policy: X Standard: X
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Policy:

Cambridge Memorial Hospital (CMH) is committed to promoting, providing and maintaining an environment where respect, independence, and dignity are demonstrated at all times to all patients and staff equally. CMH demonstrates this by providing training to staff, physicians, volunteers, agents, students and others providing goods and or services to persons with disability/disabilities as prescribed by the Accessibility for Ontarians with Disabilities Act, 2005, the Ontario Human Rights Code and in accordance with the CMH mission, vision and values.

The hospital welcomes and encourages input from all patients, visitors, staff, physicians, students, volunteers and agents as part of its commitment to the continuous improvement of patient care. CMH will meet the needs of persons with disability/disabilities in a timely manner as prescribed by the Accessibility for Ontarians with Disabilities Act, 2005 and its associated Standards, except where excluded by law.

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Definitions:

Please refer to [Accessibility for Ontarians with Disabilities Act, 2005 - O Reg 191-11](#) for definitions pertinent to this policy

Assistive Device: Assistive Devices are used by people with disabilities to help with daily living. They include a broad range of products such as but not limited to walkers, canes, wheelchairs, oxygen tanks, portable chalk boards and electronic communication devices that people may bring with them to the hospital.

Guide Dog: is a dog trained as a guide for a blind person. Guide dogs and Service dogs are not pets but working animals. CMH supports the right of the individual to be accompanied by a Guide dog or other Service animal, except where excluded by law.

Service Animal: are animals that are individually trained to perform tasks for people with disabilities such as guiding people who are blind, alerting people who are deaf, pulling wheelchairs, alerting and protecting a person who is having a seizure, or performing other special tasks.

Support Person: Individual hired or chosen to accompany a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or access to goods or services.

Standards:

Policies, practices and procedures:

- Staff should be familiar with CMH policies, practices and procedures about providing accessible customer service.
- Goods or services will be provided in a manner which respects the dignity and independence of the individual and in a manner that takes into account the person's disability.
- Provision of goods or service will be integrated unless an alternate measure is necessary to enable the person with a disability to obtain, use or benefit from any goods or service.
- Persons with disabilities will be given equal opportunity to obtain, use or benefit from goods or service.

Training

- Training about the provision of goods and services to persons with disabilities will be provided to persons involved in the development of policies practices and procedures governing the provision of goods and or services to members of the public.
- Training will include a review of the purposes of the Act, the requirements of the Regulation(s) and on the Human Rights Code as it pertains to accessibility and instruction about:
 - How to interact with persons with various types of disabilities.
 - How to interact with persons with disabilities who use an assistive device, require assistance of a service animal or the assistance of a support person.
 - How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability.
 - What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.
- Training will be provided as soon as practicable after he or she is assigned the applicable duties.
 - New staff or staff returning from a leave of absence will receive training through the Hospital Wide Orientation Process as per Hospital Orientation Policy
 - Existing staff, physicians, volunteers, and students will access Accessibility training on the intranet or by hard copy available from Human Resources, Chief of Staff, Volunteer office as applicable.

Feedback, Communication, and Notification of Service Disruption

- Feedback is directed to the Patient Relations department.
- Feedback may be in person, writing, e-mail, telephone, electronic text on disc, or using other methods as agreed upon between the individual and the hospital.

- CMH participates in the NRC Picker Patient Satisfaction Survey which provides Inpatients and Emergency patients the opportunity to comment on any number of services provided during their stay. These results are reviewed quarterly by the Quality and Operations Councils of each program.
- Disruption of Service:
 - Public notification will be undertaken should there be any temporary or unexpected interruption in service to others due to the use of CMH services by a person with disabilities. Notice must include:
 - Reason for disruption of service
 - Anticipated length of duration

Service Animals, Support Persons and Assistive Devices

- The right of the individual to use a personal assistive device, service animal or support person while accessing goods and services provided by CMH is respected and accommodated, except where excluded by law.
- Assistive device(s) will remain with the patient at **ALL** times except where there is a requirement for exclusion of said device:
 - Due to infection control risk
 - Risk of harm to the device and/or individuals
- Guide dogs and other Service animals may accompany people with disabilities in all areas of the hospital except where excluded by law or where there is a significant risk to a staff person or member of the public (identified risk of severe allergic reaction).
- If a Guide dog or Service animal is excluded by law, CMH will ensure that other measures are available to enable the person with a disability to obtain, use or benefit from CMH goods or services.
- Emotional support animals provide comfort and security. However, they do not have training for specific tasks. Therefore, emotional support animals do not qualify as service animals under the AODA. Providers may ask for proof that a customer's animal is a service animal, unless it is visibly obvious that the person has a disability and is relying on the animal. For instance, if a dog is clearly guiding a customer who is blind, providers should know without asking that this animal is a guide dog.

Clinical Note: Staff will refrain from touching or petting the guide dog or other service animal.

Accessibility Plan

- CMH will develop and maintain an ongoing Accessibility Plan that can be found on its Internet website at the following location. [CMH Accessibility Plan](#)
- All accessibility policies and plans will be available to the public, including all patients, their family, and staff on the intranet, internet and on the premises.
- The Accessibility Planning Report makes recommendations for the removal of barriers to accessibility, to senior administration and Board of Cambridge Memorial Hospital.

Integrated Accessibility Standards: Regulation 191/11

CMH is committed to the integration of regulation 191/11 requirements as noted below;

Part I - General

- General
 - Policies and procedures are in a written format and available to the public, in a format agreed upon with the person with a disability.

- The requirements 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 the persons with disabilities under any other legislation
- Multi-year accessibility plan
 - A Multi-Year Accessibility Plan (MYAP) that will outline the strategy to prevent and remove barriers and meet the requirements of this legislation will be established, implemented and maintained.
 - The MYAP will be posted on the CMH website and available to the public in a format agreed upon with the person with a disability
 - The MYAP will be reviewed and updated at least once every five years in consultation with persons with disabilities and in consultation with the Accessibility Committee
 - An annual status report on the progress of measures taken to implement the strategy referenced in the MYAP and will post this report on the CMH website and make the report available in an agreed upon format upon request
- Procuring or acquiring goods, services or facilities
 - CMH will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable.
 - Where not practicable CMH shall provide, upon request, an explanation
- Self-service kiosks
 - CMH will incorporate accessibility features when designing, procuring or acquiring self- service kiosks.
 - Under this legislation 'kiosk' means an interactive electronic terminal, including point of sale device, intended for public use that allows users to access one or more services or products or both
- Training
 - CMH will ensure staff and volunteers are trained in the requirements of the accessibility standards referred to in Regulation 191/11 and on the *Human Rights Code* [Human Rights Code, R.S.O. 1990, c. H.19](#) as it pertains to persons with disabilities including:
 - Those who participate in developing the organization's policies and
 - All other persons who provide goods, services or facilities on behalf of the organization
 - The training will be appropriate to the duties of the employee, volunteer and other persons
 - The training will be delivered as soon as practicable
 - CMH will provide training in respect of any changes to the policies on an ongoing basis
 - A record of training will be maintained including the dates on which the training is provided and the number of individuals to whom it is provided

Part II - Information and Communication Standards

- Definitions and Exceptions
 - CMH will comply with the definitions and exceptions outlined in 9.(1) (2) (3) as found in the Regulation at [Accessibility for Ontarians with Disabilities Act, 2005 - O Reg 191-11](#)

- Feedback
 - CMH will ensure that processes for receiving and responding to feedback shall be accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request
 - CMH will continue to support the requirements for feedback as prescribed under section 7 of the Ontario Regulation 429/07 (Accessibility Standards for Customer Service)
 - CMH will notify the public of available accessible formats and communication supports
- Accessible Formats and Communication Supports
 - Except as otherwise provided, CMH shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,
 - In a timely manner that takes into account the person’s accessibility needs due to disability and
 - At a cost that is no more than the regular cost charged to other persons.
 - CMH shall consult with the person making the request in determining the suitability of an accessible format or communication support
 - CMH will notify the public about the availability of accessible formats and communication support
- Emergency procedure, plans or public safety information
 - Any Emergency procedures, plans or public safety information available to the public shall be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.
- Accessible websites and web content
 - CMH will make internet and intranet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A
 - and increasing to WCAG 2.0 Level AA, other than,
 - success criteria 1.2.4 Captions (Live) and
 - success criteria 1.2.5 Audio Descriptions (Pre-recorded) (by January 1, 2021)
 - Except where meeting the requirement is not practicable, this section applies,
 - To websites and web content, including web-based applications, that CMH controls directly or through a contractual relationship that allows for modifications of the product and
 - To web content published on a website after January 1, 2012
 - The determination of practicability in relationship to this Regulation is described in S 14(6)(a) and (b) [Accessibility for Ontarians with Disabilities Act, 2005 - O Reg 191-11](#)
 - Definitions pertaining to this section are describe in S (7) [Accessibility for Ontarians with Disabilities Act, 2005 - O Reg 191-11](#)
- Educational Training and Resources and materials, etc.
 - CMH is not an obligated organization under the definitions in Schedule 1 Broader Public Sector. Examples of obligated organizations are Colleges and Universities

Part III - Employment Standards

- Scope and Interpretation
 - CMH supports the application of this section in relation to its employees; this section does not apply to volunteers
 - CMH Human Resources (HR) will update its policies, procedures and practices to ensure compliance with Regulation 191/11 Part III Employment Standards.
- Recruitment General
 - CMH will notify employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.
- Recruitment, assessment or selection process
 - During recruitment CMH Human Resources department shall through consultation with an individual requesting an accommodation, arrange for the provision of suitable accommodation, in a manner that takes into account the applicant’s accessibility needs due to disability.
- Notice to successful applicants
 - Human Resources shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.
- Informing employees of supports
 - Human Resources shall inform its employees of its policies used to support its employees with disabilities, including but not limited to, the provision of job accommodations that take into account an employee’s accessibility needs due to disability.
 - This communication will occur as soon as practicable to new employees after commencement of employment.
 - Updated information will be shared with 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.
- Accessible formats and communications supports for employees
 - Where an employee so requests it, CMH will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,
 - Information that is needed in order to perform the employee’s job; and
 - Information that is generally available to employees in the workplace.
 - Consultation with the employee will occur to determine the suitability of an accessible format or communication support
- Workplace emergency response information
 - Individual emergency response information will be provided 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 the employee with the disability requires assistance and with the employee’s consent, the workplace emergency response information will be shared with the person designated by the employer to provide assistance to the employee.
 - This information will be provided to the employee and designate as soon as practicable after the employer becomes aware of the need for accommodation

- Use documented individual accommodation plans, as described above, as part of the process.
 - The return to work process referenced here does not replace or override any other return to work process created by or under any other statute.
 - Performance Management
 - The performance management process shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using the performance management tool
 - Career development and advancement
 - The needs of the employee with disability/disabilities and any individual accommodation plans shall be taken into account when providing career development and advancement to its employees with disabilities.
 - ‘career development and enhancement’ includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another 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.
 - Redeployment
 - The accessibility needs of the employees with disabilities, as well as an individual accommodation plan shall be taken into account when redeploying employees with disabilities.
 - “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.

Part IV - Transportation Standards

- This section is not applicable to Cambridge Memorial Hospital

Part IV.I - Design of Public Spaces Standards

(Accessibility Standards for the Built Environment)

- Application
 - Except as otherwise specified, this Part applies to public spaces that are newly constructed or redeveloped on and after the dates January 1, 2016
- The legislation provides application, general obligation and technical requirements for the construction/renovation of outdoor public use eating areas on hospital grounds; exterior paths of travel including ramps, stairs, curb ramps, depressed curbs, and rest areas; accessible parking and obtaining services including service counters, fixed queuing guides and waiting areas

Guidelines:

Communication:

- When communicating with a person with a disability, do so in a manner that takes into account the person’s disability. Communicate with a person with a disability in a manner that takes into account their individual needs.
 - Think about and/or learn how people with disabilities communicate.

- Be flexible in planning the approach (e.g. use of written, spoken, or picture form or other assistive device may be useful.)
- Ask the patient directly about their preferred method of communication
- Plan ahead where possible to ensure the appropriate assistive device is available.
 - A variety of assistive measures are available for patients use including:
 - TTY service, lifts, staff resources (Occupational Therapists, Speech and Language Pathologists).
 - Other community resources.

Service Animals:

- Tips on interacting with a customer who uses a service animal:
 - Avoid making assumptions about the animal. Not all Service animals wear special collars or harnesses. If you are not sure if the animal is a pet or Service animal, ask the person with a disability.
 - Patient is responsible for the care and supervision of their Service animal. Staff is not expected to provide care or food for the animal. However, staff can provide water for the Service animal if the patient requests this.
 - Refer to Appendix A

Support Person:

- Support person role:
 - Provides care needs:
 - Personal care needs including but not limited to assistance with eating or using the washroom.
 - Medical needs may include but are not limited to, monitoring the person with a disability's health conditions, providing injections and providing support when someone has moderate to severe seizures.
 - Support person can be a paid personal support worker, volunteer, a friend or a family member. He or she does not necessarily need to have special training or qualifications.
 - Refer to Appendix B
- Interacting with a patient who has a support person:
 - The person with a disability may not introduce their support person. If you are not sure which person is the patient, take your lead from the person using or requesting your service and/or simply ask.
 - Once you have determined who the patient is, speak directly to them, not to their support person.

Procedure:

Feedback and Communication:

1. Patients and families are welcome to contact the Patient Relations Service. The focus of the Service is on improving communication, accessing information or resources, and addressing and resolving difficulties.
2. The Patient Relations Service provides a bridge between patients/families and the hospital. The Patient Relations Coordinator assists patients or families who are experiencing difficulty, or who may have questions, concerns or a compliment about their care or service at CMH.

3. We encourage and welcome feedback and suggestions from patients and families, in person, by letter, or by telephone. Alternative communication formats may be arranged upon request.
4. Confidentiality is highly respected and maintained.
5. The Cambridge Memorial Hospital Patient Relations Service is available Monday to Friday, 9:00 a.m. to 5:00 p.m., at 519-621-2333, ext. 2360 or via e-mail patientrelations@cmh.org
6. The Patient Relations department coordinates a response with the department manager, senior administration, physicians and staff as required, addressing the concerns of the person providing the feedback.
7. Patient Relations provides any feedback related to Accessibility to the Accessibility Committee for inclusion in the annual Accessibility Planning Report.

Accessibility Training:

1. Notification of changes to policies, practices and procedures and any associated training requirements are distributed to all staff, physicians, agents, volunteers, and students via Outlook and communications broadcast.
2. Training will be ongoing in connection with changes to policies, practices and procedures.
3. CMH training policy will be available for the public and will identify:
 - a) Summary of the contents of the training and details of when the training is to be provided.
 - b) Record of training provided, including the dates on which training is provided and the number of individuals to whom it is provided.

Assistive Devices, Service Animals and Support Persons

Assistive Device:

1. Manager and staff will collaborate, discuss and develop a plan with the person with the assistive device, service animal or support person to arrange for alternate support in the event that they are unable to stay with the patient

Service Animals and Guide Dogs:

1. Staff will collaborate and discuss with the person with a disability areas where the presence of a Service animal is not allowed prior to their arrival (where possible) and develop alternate arrangements.
2. Guide dogs and other Service animals are not permitted where sterile procedures occur in accordance with the Health Promotion and Protection Act including but not limited to:
 - a) Operating Rooms,
 - b) Minor Procedure Rooms or Rooms where sterile interventional procedures are occurring
 - c) In any room where radiation exposure occurs (X-ray, CT, MRI) or where there is potential risk to the service animal
3. Infection Prevention and Control and the Manager/Shift Administrator and/or Manager on Call must be contacted whenever a patient with a Service animal is admitted to the hospital or, whenever there is a concern regarding the safety and/or security of persons in the area
4. A patient admitted with a Service animal will be accommodated in a private room at no extra charge. The care of the Service animal is the responsibility of the owner.

5. If in accordance with this policy, it becomes necessary to separate the Service animal from its owner, healthcare personnel will make all reasonable efforts to help facilitate the transfer of the animal to a designated person.
6. The person who requires the Service animal may be asked to provide a letter from a physician or nurse, or documentation from the Ministry of the Attorney General's office confirming that the person requires a Service animal.

Support Person:

1. Where a support person is excluded by law, Cambridge Memorial Hospital will accommodate alternative ways for the person with disabilities to access our goods and services.
2. Support persons may be permitted in areas where some sterile procedures occur in accordance with the Health Promotion and Protection Act including but not limited to:
 - a) Operating Rooms,
 - b) Minor Procedure Rooms (case specific)
 - c) In any room where radiation exposure occurs (X-ray, CT, MRI) or where there is potential risk to the support person
3. Staff will inform the person with a disability of areas where the presence of a support person is not allowed prior to their arrival (where possible) and will develop an accessibility plan with the individual identifying alternate support arrangements.
4. Confidentiality and privacy of the person with a disability and other clients will be respected at all times by staff and may be requested of the support person where applicable (i.e. group counseling sessions)
5. The right to autonomous decision-making is protected by law is applicable to people with disability accompanied by a support person. Refer to Consent to Treatment Policy
6. Staff may request a support person be provided by the patient in order to protect the health and welfare of a person with disability.
7. Patients with disabilities must be allowed to use their support persons while accessing hospital services.

References:

Service Ontario (2009). [Accessibility for Ontarians with Disabilities Act](#) S.O. Chapter 11

Service Ontario (2005) [Accessibility for Ontarians with Disabilities Act](#) *Customer Service Standards 429/07*

[Blind Persons' Rights Act](#) (1990) R.S., c. 40, s. 1

Ontario Hospital Association (2008). *Accessibility for Ontarians with Disabilities Act (2005). Taking a close look at the Standards: Impact and Implications.* Toronto, ON

Canadian National Institute for the Blind. Kitchener, ON. Accessibility Specialist.

Service Ontario (2011) [Accessibility for Ontarians with Disabilities Act](#) *Integrated Accessibility Standard Regulation 191/11*

Service Ontario (2005). [Accessibility for Ontarians with Disabilities Act](#) *Training Resource for Small Businesses and Organizations*

Human Rights Code [Human Rights Code, R.S.O. 1990, c. H.19](#)

Cambridge Memorial Hospital Accessibility Policy [Accessibility Policy](#)

[Americans with disabilities Act](#) (1990)

University Health Network. (2013) Administrative – Accessibility for Ontarians with Disabilities Act – Integrated Accessibility Standards Regulation

Sault Area Hospital. (2013). Accessibility Policy

Developed in Consultation with:

- Accessibility Committee
- Manager, Planning and Development
- Human Resources
- Patient Relations and Safety Specialist
- Information Management Technology
- Purchasing Department
- Infection Prevention and Control

Appendix A: Service Animal Role Guidelines

Service Animal	Key Tasks	Users
Autism assistance or service dog.	Keeps a child from running into danger and provides assistance when sensory stimulus is heightened. Dog is attached to the child's waist by a belt and a leash	People with autism or other developmental/ intellectual disabilities.
Guide dog, dog guide or seeing eye dog	Follows directions of owner, alerts owner to changes in elevation (e.g., curbs, stairs) and obstacles.	People with vision loss.
Hearing ear, hearing, sound alert or hearing alert dog, cat or animal	Alerts owner to sounds often by a nudge or pawing and leads him/her to the source of the sound. May use a special signal to alert owner to fire alarm.	People who are Deaf, oral deaf, deafened or hard of hearing.
Psychiatric service dog	Retrieves and prompts the person to take medicine, retrieves or activates medical alert, leads person out of crowds, etc.	People with mental health disabilities.
Service or mobility dog or animal, special skills dog or animal (Small ponies or miniature horses are used but are not as common).	May pull wheelchairs, carry objects, pull items, turn handles or push buttons such as door openers. Larger dogs may provide balance support.	People with physical disabilities.
Seizure, seizure alert, seizure assist or seizure response dog or animal	Steers owner from danger during a seizure, activates medical alert Can alert owner to an oncoming seizure	People who have epilepsy or other seizure disorders.

Ministry of Community and Social Services. Training Resource - Customer Service Standard 429/07 Pg. 27

Appendix B: Support Person Role Guidelines

Person with a Disability	Support Person's Functions
Person who is deaf / blind	To guide, to provide transportation and adaptive communication such as tactile or adapted American Sign language, large print notes, print on palm or two-handed manual signing.
Person who is deaf, deafened, oral deaf	To provide sign language or oral interpretation services - to translate conversation, not to participate in it.
Person with a learning disability	To help with complex communication or note-taking.
Person with an intellectual/ developmental disability	To help with travel, daily activities, prompting medication, complex tasks, or to keep them from dangerous situations.
Person with a Disability	Support Person's Functions
Person with a mental health disability	To help with communication tasks such as completing complex forms. To help in environments such as crowded, noisy settings or high-stress situations such as interviews.
Person with a physical disability	To provide services related to travelling, personal care such as toileting or eating, monitoring medical conditions.
Person with a seizure disorder	To assist in the event of a seizure, e.g. to protect the individual from falls
Person with vision loss	To read or to guide.
Person with a speech impairment who uses an augmentative or alternative communication system (symbol board, electronic communication system)	To relay or interpret a person's communications.

Ministry of Community and Social Services. Training Resource - Customer Service Standard 429/07 Pg. 31