

Accessibility Requirement	Activities and Resources	Due Date	Status: Complete, In Progress, Ongoing
<b>General Requirements</b>			
<u>Establishment of Accessibility Policies</u> <ul style="list-style-type: none"> <li>Develop, implement, maintain policies re how organization achieves or will achieve accessibility through meeting its requirements</li> <li>Prepare one or more written documents describing policies; and make the documents publicly available, and provide them in an accessible format upon request. O. Reg. 191/11, s. 3 (3).</li> </ul>	<ul style="list-style-type: none"> <li>Create Policies with Statement of Commitment in written form</li> <li>Obtain approval and sign off</li> <li>Make policies available to the public</li> <li>Available in alternative formats – upon request</li> <li>Update/revise policies and procedures to reflect IASR</li> </ul>	Jan 2015	<ul style="list-style-type: none"> <li>Policies – complete; review and updates – ongoing and as needed</li> </ul>
<u>Accessibility Plans</u> <ul style="list-style-type: none"> <li>Establish, implement, maintain and document a multi-year accessibility plan, outlining strategy to prevent and remove barriers and meet requirements</li> <li>Post plan on website, provide plan in accessible format on request;</li> <li>Review and update the accessibility plan at least once every five years. O. Reg. 191/11, s. 4 (1).</li> </ul>	<ul style="list-style-type: none"> <li>Develop the Multi-Year Accessibility Plan to address/prevent and remove barriers</li> <li>Post on Carefirst website</li> <li>Prepare status report</li> <li>Review the Multi-Year Accessibility Plan every 5 years</li> </ul>	Dec 2020	<ul style="list-style-type: none"> <li>Multi-Year Accessibility Plan - complete</li> <li>Status report and review of the Multi-Year Plan - ongoing</li> </ul>
<u>Training</u> <ul style="list-style-type: none"> <li>Provide training on requirements of accessibility standards in this Regulation and on the <i>Human Rights Code</i> as it pertains to persons with disabilities to,               <ul style="list-style-type: none"> <li>(a) all employees, and volunteers;</li> <li>(b) all persons who participate in developing the organization's policies; and</li> <li>(c) all other persons who provide goods, services or facilities on behalf of the organization. O. Reg. 191/11, s. 7 (1).</li> </ul> </li> <li>Every person referred to in subsection (1) shall be trained as soon as practicable. O. Reg. 191/11, s. 7 (3).</li> <li>Training to be provided as soon as practicable after person assigned duties. O. Reg. 429/07, s. 6 (3).</li> </ul>	<ul style="list-style-type: none"> <li>Provide training on the Customer Service Standard, Integrated Accessibility Standards and on the Human Rights Code to all employees and volunteers, policy developers, and those who provide services on behalf of Carefirst</li> <li>Maintain training record               <ul style="list-style-type: none"> <li>Training delivered through HR Downloads, training records are kept on the same portal</li> <li>Individual training records are collected and forwarded to HR through probationary/annual performance review process</li> </ul> </li> </ul>	Jan 2016	<ul style="list-style-type: none"> <li>Training for existing employees and volunteers - complete</li> <li>Training for new hires/new volunteers – ongoing</li> </ul>

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<ul style="list-style-type: none"> <li>• Provide training re any changes to policies described in section 3 on an ongoing basis. O. Reg. 191/11, s. 7 (4). Training must include a review of the purposes of the Act and requirements about the following matters O. Reg. 429/07, s. 6 (2): <ul style="list-style-type: none"> <li>- How to interact/communicate with persons with various types of disabilities;</li> <li>- How to interact with people with disabilities who use assistive devices; require the assistance of a guide dog, service animal or require the assistance of a support person;</li> <li>- How to use equipment or devices that are available at your premises or that may assist people with disabilities;</li> <li>- What to do if a person with a particular type of disability is having difficulty accessing the services</li> </ul> </li> <li>• Keep record of training, including dates provided and number of individuals to whom it is provided.</li> </ul>			
<b>Customer Services</b>			
<u>Use of Service Animals and Support Persons</u> <ul style="list-style-type: none"> <li>• Ensure person permitted to enter the premises with the animal and keep animal with him/her unless the animal is excluded by law from premises. O. Reg. 429/07, s. 4 (2).</li> <li>• If a service animal excluded by law ensure other measures available to enable person with disability to obtain, use or benefit from goods or services. O. Reg. 429/07, s. 4 (3).</li> <li>• If person with a disability is accompanied by support person, ensure that both persons are permitted to enter the premises together and that person with disability is not prevented from having access to support person while on premises. O. Reg. 429/07, s. 4 (4).</li> <li>• Provider may require person with disability to be accompanied by support person when on premises, but only if a support person is necessary to protect health or</li> </ul>	<ul style="list-style-type: none"> <li>• Incorporate requirements in policy</li> <li>• Service animals allowed on site to assist persons with disabilities except where prohibited by law and local health regulations (i.e. kitchen).</li> </ul>		Complete

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<p>safety of person with disability or the health or safety of others on premises. O. Reg. 429/07, s. 4 (5).</p> <ul style="list-style-type: none"> <li>• Prepare documents describing policies, practices, procedures re matters governed by section and give copy on request, O. Reg. 429/07, s. 4 (7).</li> </ul>			
<p><u>Feedback Process</u></p> <ul style="list-style-type: none"> <li>• Establish process for receiving and responding to feedback about the manner in which goods or services are provided to persons with disabilities, and make information about process readily available to public O. Reg. 429/07, s. 7 (1).</li> <li>• Ensure feedback process is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, on request. O.Reg. 165/16 s.16.</li> <li>• Notification to the public about the availability of accessible formats and communication supports is required.</li> <li>• Process must specify the actions that provider must take if complaint is received. O. Reg. 429/07, s. 7 (3).</li> <li>• Prepare document describing feedback process and, upon request, give copy to person. O. Reg. 429/07, s. 7 (4).</li> </ul>	<ul style="list-style-type: none"> <li>• Establish accessible feedback and complaints process</li> <li>• Notify the public about the accessible formats and communication supports through company website.</li> <li>• Combine Customer Service Feedback into Accessibility Feedback Form</li> <li>• Set up “Suggestion Box” on ground floor</li> </ul>	2012	<ul style="list-style-type: none"> <li>• Post notices and client feedback form on website - complete</li> <li>• Notice to clients of availability of documents and feedback form /further information, to be included in client package - in progress</li> <li>• Service brochure to include reference to policy and feedback options/forms; forms can be left in pockets or stands in reception areas/by doors - in progress</li> <li>• Install Suggestion Box - complete</li> <li>• Customer Service Feedback Form is available on Carefirst website - complete</li> </ul>
<p><u>Notice of service disruptions;</u></p> <ul style="list-style-type: none"> <li>• If there is a temporary disruption, give notice of disruption to public. O. Reg. 429/07, s. 5 (1).</li> </ul>	<ul style="list-style-type: none"> <li>• Include notice requirements in policy and sample notice forms</li> <li>• Develop Notice of Service Disruption template to ensure pertinent information is included</li> </ul>	Jan 2012	<ul style="list-style-type: none"> <li>• Policy – complete</li> <li>• Notice of Service Disruption template - saved in shared drive</li> </ul>

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<ul style="list-style-type: none"> <li>• Notice must include information re reasons, anticipated duration, and alternative facilities or services where available. O. Reg. 429/07, s. 5 (2).</li> <li>• Post notice at conspicuous place on premises, website, or other methods O. Reg. 429/07, s. 5 (3).</li> <li>• Prepare document setting out steps to be taken if temporary disruption and, upon request, shall give copy to person. O. Reg. 429/07, s. 5 (4)</li> </ul>	<ul style="list-style-type: none"> <li>• Post Notice of Service Disruption at a conspicuous place (each entrance and elevator) during time of closure that applies to all persons looking for service.</li> <li>• Overall communication plan for service disruption: <ul style="list-style-type: none"> <li>- Maintain an up-to-date distribution list for each service program</li> <li>- Notify service users asap</li> </ul> </li> </ul>		
<p><u>Format of documents</u></p> <ul style="list-style-type: none"> <li>• If required, a copy of document shall be provided to the person with disability in an accessible format or with communication support 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. O.Reg. 165/16 s.16.</li> <li>• Consult with the person making the request in determining the suitability of an accessible format or communication support. O.Reg. 165/16 s.16.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop policy and process to ensure written information and other forms of communication accessible</li> <li>• Upon request, provide or arrange to provide accessible formats and communication supports for persons with disabilities: <ul style="list-style-type: none"> <li>➤ In a timely manner that takes into account the person's accessibility needs;</li> <li>➤ At a cost that is no more than the regular cost charged to other persons.</li> </ul> </li> <li>• Consult with the person making the request to determine the suitability of an accessible format or communication support</li> <li>• Website in accessible format</li> <li>• Post notice on website</li> </ul>		<ul style="list-style-type: none"> <li>• Post notices on website - complete</li> <li>• Notice to clients of availability of documents and feedback/further information, to be included in client package - in progress</li> <li>• Service brochure to include reference to policy and feedback options/forms; forms can be left in pockets or stands in reception areas/by doors - in progress</li> </ul>
<b>Information and Communication</b>			
<p><u>Accessible Formats and Communication Support</u></p> <ul style="list-style-type: none"> <li>• Upon request, provide or arrange to provide accessible formats and communication supports for persons with disabilities: <ul style="list-style-type: none"> <li>➤ In a timely manner that takes into account the person's accessibility needs;</li> <li>➤ At a cost that is no more than the regular cost charged to other persons.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Carefirst to post availability and make effort to meet individual requests</li> <li>• Upon request, provide accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs. Accessible formats will not affect the cost charged (if any).</li> </ul>	Jan 2016	<ul style="list-style-type: none"> <li>• The public/service users are notified about the availability of accessible formats and communication supports by a notification posted on website - complete</li> </ul>

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<ul style="list-style-type: none"> <li>Consult with the person making the request to determine the suitability of an accessible format or communication support</li> <li>Notify public re availability of accessible formats and communication supports. O. Reg. 191/11, s. 12 (1 - 3).</li> </ul>	<ul style="list-style-type: none"> <li>Consult with the person making the request to provide or arrange support.</li> <li>Notify the public about accessible formats and communication supports that may be available</li> </ul>		
<u>Emergency procedure, plans or public safety information</u> <ul style="list-style-type: none"> <li>If organization prepares emergency procedures, plans or public safety information and makes the information available to the public, provide information in accessible format or with appropriate communication supports, as soon as practicable, upon request. O. Reg. 191/11, s. 13 (1).</li> </ul>	<ul style="list-style-type: none"> <li>Carefirst to provide emergency plans and procedures upon request in accessible format or with appropriate communication supports, as soon as practicable, if requested.</li> </ul>	Jan 2012	<ul style="list-style-type: none"> <li>Update Emergency &amp; Evacuation Procedure to ensure information is provided in an accessible format, upon request - complete</li> </ul>
<u>Accessible websites and web content</u> <ul style="list-style-type: none"> <li>All websites and web content</li> <li>Internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A initially O. Reg. 191/11, s. 14 (2)</li> <li>By January 1, 2014, <i>new</i> internet websites and web content on those sites must conform with WCAG 2.0 Level A</li> <li>By January 1, 2021, all internet websites and web content must conform with WCAG 2.0 Level AA, other than,               <ul style="list-style-type: none"> <li>(i) success criteria 1.2.4 Captions (Live), and</li> <li>(ii) success criteria 1.2.5 Audio Descriptions (Pre-recorded). O. Reg. 191/11, s. 14 (4).</li> </ul> </li> </ul>	<p>Since December 2020, AAChecker tool has been used on all web pages to ensure Carefirst website/web content meet WCAG 2.0 Level AA requirement.</p> <p>Example:</p> <ul style="list-style-type: none"> <li>Images were tagged with text description.</li> <li>Web pages were tagged with self-explanatory titles.</li> <li>Videos were added with sub-title and audiences were able to control pause, stop, adjust volume, etc.</li> <li>Slide show pages can be paused.</li> <li>Website functions works using a keyboard.</li> <li>Text fonts size can be resized (enlarged) through Browser's view settings.</li> <li>No flashing objects, nor bright color were being used for web page content.</li> </ul> <p>Additionally, "accessiBe" app is installed on server to further enhance web content accessibility.</p>	Dec 2020	Complete

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<u>Educational and Training Resources or Materials</u> <ul style="list-style-type: none"> <li>Provide educational or training resources/materials in an accessible format that takes into account the accessibility needs due to a disability of the person with a disability to whom the material is to be provided by               <ol style="list-style-type: none"> <li>procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of educational or training resources or materials, where available, or</li> <li>arranging for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or training resources or materials cannot be procured, obtained by other means or converted into an accessible format</li> </ol> </li> <li>Provide student records and information on program requirements, availability and description in an accessible format to persons with disabilities. O. Reg. 191/11, s. 15 (1)</li> </ul>	<ul style="list-style-type: none"> <li>Carefirst will provide educational, training resources or materials in an accessible format upon request and will do so in a way that considers the accessibility needs of an individual's disability.</li> <li>Carefirst will provide student records and information on program requirements, availability and description in an accessible format to persons with disabilities.</li> <li>Carefirst will adhere to accessibility standards and principles when designing, adopting, and procuring educational materials and resources. In the case that materials cannot be procured, obtained, or converted into an accessible format, Carefirst will ensure to make the necessary arrangements for the provision of a comparable resource.</li> </ul>	N/A	Ongoing
<u>Training to Educators</u> <ul style="list-style-type: none"> <li>Provide educators with accessibility awareness training related to accessible program or course delivery and instruction. O. Reg. 191/11, s. 16 (1)</li> <li>Keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided. O. Reg. 191/11, s. 16 (2)</li> </ul>	<ul style="list-style-type: none"> <li>HR to arrange AODA training to all VTC instructors through the online training portal</li> <li>HR to keep a record of the training provided to VTC instructors</li> </ul>	N/A	<ul style="list-style-type: none"> <li>Training for all current and existing VTC instructors - complete</li> <li>Training for newly appointed VTC educators/instructors - ongoing</li> </ul>
<b>Employment</b>			
<u>Recruitment, general</u> <ul style="list-style-type: none"> <li>Notify employees and public re the availability of accommodation for applicants with disabilities in recruitment processes. O. Reg. 191/11, s. 22.</li> </ul>	<ul style="list-style-type: none"> <li>Notify all employees and public regarding availability of accommodation in all job postings, career section of the agency website, job application form, and conditional offers</li> </ul>	Jan 2016	Ongoing
<u>Recruitment, assessment or selection process</u> <ul style="list-style-type: none"> <li>During process, notify applicants, when selected to participate in an assessment/selection process, that</li> </ul>	<ul style="list-style-type: none"> <li>Notify applicants contacted for interview that accommodations are available upon request,</li> </ul>	Jan 2017	Ongoing

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<p>accommodations are available upon request in relation to the materials or processes to be used. O. Reg. 191/11, s. 23 (1).</p> <ul style="list-style-type: none"> <li>If selected applicant requests an accommodation, consult with applicant and provide or arrange for provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability. O. Reg. 191/11, s. 23 (2).</li> </ul>	<p>and in manner that takes into account applicant's accessibility needs.</p> <ul style="list-style-type: none"> <li>Notify all applicants being interviewed that Carefirst provides accommodations, in a manner that takes into account their disabilities.</li> <li>Provide appropriate training to staff responsible for recruitment, assessment, selection and onboarding to ensure all the aforementioned actions are delivered</li> </ul>		
<p><u>Notice to successful applicants</u></p> <ul style="list-style-type: none"> <li>Every employer shall, when making offers of employment, notify the successful applicant of policies for accommodating employees with disabilities O. Reg. 191/11, s. 24.</li> </ul>	<ul style="list-style-type: none"> <li>Successful candidates are notified of Carefirst's policies regarding accommodation</li> </ul>	Jan 2017	Ongoing
<p><u>Informing employees of supports</u></p> <ul style="list-style-type: none"> <li>Inform all employees of policies used to support employees with disabilities (including, but not limited to, policies re job accommodations)</li> <li>Provide information to new employees as soon as practicable after beginning employment.</li> <li>Provide updated information to all employees re changes to 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 (1 - 3).</li> </ul>	<ul style="list-style-type: none"> <li>Provide information to all new hires on the current policies used to support employees with disabilities</li> <li>Notify employees whenever there is a change to policies or accommodations</li> </ul>	Jan 2017	Ongoing
<p><u>Accessible formats and communication supports for employees</u></p> <ul style="list-style-type: none"> <li>If employee with disability requests it, consult with employee to provide or arrange for the provision of accessible formats and communication supports for Information to perform job, and Information that is generally available to employees in workplace</li> <li>Consult with employee in determining suitability of an accessible format or communication support. O. Reg. 191/11, s. 26 (1 - 2).</li> </ul>	<ul style="list-style-type: none"> <li>Provide accessible formats and communication supports for information to perform job</li> <li>Upon request, consult with the employee to determine their needs for accessible format and communication support.</li> </ul>	Jan 2017	Ongoing

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<p><u>Workplace Emergency Response information</u></p> <ul style="list-style-type: none"> <li>• 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 (IWERI), requires assistance, and with the employee's consent, the employer shall provide this information to the person designated by the employer to provide assistance to the employee</li> <li>• Provide information required under this section as soon as practicable after becoming aware of need for accommodation</li> <li>• Individualized workplace emergency response information shall be reviewed when the employee moves to a different location in the organization, their overall accommodations needs or plans are reviewed, and when employer reviews its general emergency response policies. O. Reg. 191/11, s. 27 (1 - 4).</li> </ul>	<ul style="list-style-type: none"> <li>• Develop individualized workplace emergency response plan (IWERP), where Carefirst is aware of the need for accommodation, as soon as is practicable after becoming aware of the need.</li> <li>• Provide information to the employee or designate (with employee's consent, to person designated by Carefirst to provide assistance to the employee).</li> <li>• Review IWERP after a location move; when accommodations needs or plans are reviewed; or when Carefirst reviews its emergency response policies.</li> <li>• Manager explores emergency procedures for site/location and integrates that accommodation in the site/location's Emergency Plan.</li> </ul>	Jan 2012	Ongoing
<p><u>Documented Individual Accommodation Plans (IAPs)</u></p> <ul style="list-style-type: none"> <li>• Develop written process for the development of documented individual accommodation plans for employees with disabilities. O. Reg. 191/11, s. 28 (1).</li> <li>• The process for the development plans to include: <ul style="list-style-type: none"> <li>- employee requesting accommodation can participate in development of plan</li> <li>- employee is assessed on an individual basis;</li> <li>- employer can request an evaluation by an outside medical or other expert</li> <li>- Steps to protect privacy of</li> <li>- Frequency of reviewing and updating individual accommodation plan</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Develop written process for the development of documented IAPs for employees, which includes: <ul style="list-style-type: none"> <li>- Employee participation</li> <li>- Employee assessment</li> <li>- Requests for outside evaluation (at Carefirst expense) on how and whether accommodation can be achieved</li> <li>- Privacy protocols</li> <li>- Updating schedule</li> <li>- Protocols for informing employees why request for IAP is denied,</li> <li>- Protocol for providing IAP in appropriate accessible format.</li> </ul> </li> </ul>	Jan 2017	Ongoing



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	<ul style="list-style-type: none"> <li>- If requested information on accessible formats and communication supports</li> <li>- If required, individualized workplace emergency response information</li> <li>- Other accommodations provided</li> </ul>		
<u>Return to Work Process</u> <ul style="list-style-type: none"> <li>• Develop and have in place a return to work process for employees absent from work due to a disability and require disability-related accommodations in order to return to work; and</li> <li>• Outline the steps employer will take to facilitate return to work of employees who were absent because their disability required them to be away from work</li> <li>• Use documented individual accommodation plans as set out in S. 28, as part of process. O. Reg. 191/11, s. 29 (1 - 3).</li> </ul>	<ul style="list-style-type: none"> <li>• Develop, implement, and document the steps in a return to work process where absenteeism is due to a disability that requires disability-related accommodations.</li> <li>• This process does not replace or override any other return to work process created by or under any statute</li> </ul>	Jan 2017	Ongoing
<u>Performance management</u> <ul style="list-style-type: none"> <li>• Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using performance management process in respect of employees with disabilities. O. Reg. 191/11, s. 30 (1).</li> </ul>	<ul style="list-style-type: none"> <li>• Consider accessibility needs, and IAPs of employees with disabilities when assessing performance, productivity and effectiveness during performance management process</li> </ul>	Jan 2017	Ongoing
<u>Career development and advancement</u> <ul style="list-style-type: none"> <li>• Take into account accessibility needs of employees with disabilities, and individual accommodation plans, when providing career development and advancement O. Reg. 191/11, s. 31 (1).</li> </ul>	<ul style="list-style-type: none"> <li>• Take accessibility needs and IAPs into account when considering greater responsibilities at current position, moving to position higher in pay, level, or responsibilities; or any combination or career development and advancement of employees with disabilities.</li> </ul>	Jan 2017	Ongoing
<u>Redeployment</u> <ul style="list-style-type: none"> <li>• 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 - 2).</li> </ul> <p>Note: In this section, “redeployment” means the reassignment of employees to other departments or jobs within the organization as an</p>	<ul style="list-style-type: none"> <li>• Consider accessibility needs and IAPs of employees with disabilities when redeploying, reassignment as an alternative to layoff, when a job or location changes.</li> </ul>	Jan 2017	Ongoing

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alternative to layoff, when a particular job or department has been eliminated by the organization.			
Design of Public Spaces			
<ul style="list-style-type: none"> <li>This Part applies to public spaces that are newly constructed or redeveloped on and after January 1, 2017</li> </ul>	<ul style="list-style-type: none"> <li>The AODA Committee and Facility Management ensures Accessibility Requirements will be followed when new buildings are designed or there are significant changes to Carefirst facilities.</li> <li>ADP moved to a new location (705 Progress Ave) in October 2024. The outdoor sidewalks and walkway including associated ramps are not accessible for clients with walkers/wheelchairs. Facility Management has submitted the drawings for building permanent ramps to the Building Department for approval.</li> </ul>	Sept 2024	<ul style="list-style-type: none"> <li>ADP New Location – Temporary measures of using foldable ramps – complete; permanent ramp drawings submitted to the Building Department for approval</li> </ul>