

NORTHERN ONTARIO SCHOOL OF MEDICINE

2013- 2018

Multi-Year Accessibility Plan

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1 Northern Ontario School of Medicine

The Northern Ontario School of Medicine (NOSM) serves as the faculty of medicine for Lakehead University in Thunder Bay and Laurentian University in Sudbury. The School has developed and delivers a distinctive model of distributed, community-engaged, and socially accountable, medical education.

Across the region, NOSM learners (medical students, residents, and learners from other health disciplines such as rehabilitation sciences, dietetics, and physician assistants), are gaining relevant clinical experience under the guidance of health professionals in community hospitals, clinics, and family practices. The School brings together over 70 community partners, over 1200 clinical, human, and medical sciences stipendiary faculty, and more than 200 employees.

2 Accessibility for Ontarian's with Disabilities Act

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) was enacted to develop, implement, and enforce Accessibility Standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, premises and transportation throughout Ontario by the year 2025. Accessibility Standards include the Accessible Customer Service Standard (O. Reg. 429/07) and the Integrated Accessibility Standard Regulation (O. Reg. 191/11) which is comprised of general requirements and specific requirements relating to the following standards:

- Information & Communication
- Employment
- Design of Public Spaces
- Transportation,

Under the Integrated Accessibility Standards Regulation (IASR), the Northern Ontario School of Medicine (NOSM) is required to establish, implement, maintain and document a multi-year accessibility plan. This plan outlines the NOSM's strategy to identify, prevent and remove accessibility barriers, and meet its requirements under the IASR.

In accordance with the requirements set out in the Integrated Accessibility Standard Regulation, the NOSM will:

- Post the accessibility plan on its website (www.nosm.ca);
- Provide the plan in an accessible format upon request;

- Review and update the accessibility plan at least once every five years;
- Establish, review and update the accessibility plan in consultation with persons with disabilities;
- Prepare an annual status report and post it on the NOSM website.

3 Commitment to Accessibility

Our Mission and Values

NOSM is committed to the education of high quality physicians and health professionals, and to international recognition as a leader in distributed, learning-centred, community-engaged education and research.

NOSM's vision for Innovative Education and Research for a Healthier North is supported by our values of:

- Innovation
- Social Accountability
- Collaboration
- Inclusiveness
- Respect

Our Commitment to Accessibility

The Northern Ontario School of Medicine is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in inclusion and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

4 Accessibility Working Group

NOSM has an Accessibility Working Group (AWG) consisting of internal stakeholders who meet on a monthly basis. The Accessibility Working group, under the leadership of the Office of Equity and Quality, is responsible for:

- Developing, monitoring and reviewing NOSM's Accessibility Plan.
- Developing and implementing strategies for accessibility barrier identification and removal.

- Assisting NOSM with meeting its obligations under the Accessibility for Ontarians with Disabilities Act (AODA) and the Human Rights Code.

5 Report on Measures to Identify, Remove and Prevent Barriers

Under the *Accessibility for Ontarians with Disabilities Act, 2000*, a barrier means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, any information or communications barrier, an attitudinal barrier, a technological barrier, a policy, procedure or a practice.

NOSM has undertaken the following barrier identification and removal initiatives:

Attitudinal:

- NOSM is a leader in building SafeTALK and ASIST (suicide prevention training) into our Undergraduate Medical Education (UME) curriculum. All first year learners are required to complete SafeTALK and in second year will complete ASIST training. Given the suicide rate in Northern Ontario, this initiative led by Brian Ross, Phase 1 Coordinator to prepare our learners for practice and to support the wellbeing of physicians and medical learners is important for medical education and physician/medical learner wellness.
- Staff in Learner Affairs have been provided with mental health and suicide awareness training as part of initiatives to reduce attitudinal barriers and create healthy campuses and communities; *Learner Mental Health: Everyone has a Role to Play* and *Learner Mental Health – Suicide Risks & Actions - Myth or Fact?*

Information and Communication:

- NOSM conducted a web accessibility audit to determine compliance with the Web Content Accessibility Guidelines and is developing a plan to remediate accessibility issues.
- NOSM Communications staff are participating in training sessions on how to create accessible documents.
- NOSM will establish a Virtual Resource Centre for Accessibility on MyNOSM intranet.

Policy, Procedure, Practice

- NOSM received Accessibility Funds for Students with Disabilities (AFSD) from the Ministry of Training, Colleges and Universities to support the unique accommodation

needs of NOSM learners, especially in Phase 2 & 3 when they are in community and hospital settings.

- We will continue to review NOSM policies to identify opportunities to integrate accessibility.
- NOSM is committed to creating an inclusive workplace and to ensure that accessibility for people with disabilities is included throughout the employment life cycle.

Architectural

- NOSM is committed to building accessible, gender neutral washrooms on the NOSM campuses, as part of future construction or major renovation of physical facilities.

6 Customer Service

The Northern Ontario School of Medicine is committed to equity and accessibility and assuring compliance with the Accessibility Standards for Customer Service, O. Reg. 429/01 and the Accessibility for Ontarians Act, 2005 (“AODA, 2005”). The School is committed to providing goods and services in such a manner that respects the dignity and independence of persons with disabilities. Further the School will ensure that all persons with disabilities have equal opportunity to access the School’s goods and services. Consequently, the School will integrate the provision of goods and services to persons with disabilities into its practices and protocols except when an alternative measure is required on either a permanent or temporary basis, to enable persons with disabilities to obtain and/or benefit from the provided goods and services.

The Accessibility Protocol for Customer Service Standard is available on the NOSM website at http://www.nosm.ca/about_us/general.aspx?id=11218

7 Accessibility Plan

The Integrated Accessibility Standard Regulation (ONTARIO REGULATION 191/11) consists of 6 parts:

- I. General Requirements
- II. Information and Communications Standards
- III. Employment Standards
- IV. Transportation Standards
- V. Design of Public Spaces Standards (Accessibility Standards For The Built Environment)

VI. Compliance

The following chart provides an overview of the timeline for compliance with the AODA Standards for a Broader Public Sector Organization with 50+ employees.

Timelines for Compliance with Accessibility Standards NOSM (Designated Public Sector)

2012

Information and Communications

- Emergency and public safety information

Employment

- Workplace emergency information

2013

General Requirements

- Policies
- Accessibility Plans
- Procuring or acquiring goods, services or facilities
- Kiosks

Information and Communications

- Educational and training resources and materials
- Training to Educators

2014

General Requirements

- Training

Information and Communications

- Accessible feedback processes
- New internet websites and web content on those sites must conform with WCAG 2.0 Level A

Employment

- Recruitment
- Employees returning to work
- Employee accommodation
- Performance management, career development and deployment

2015

Information and Communications

- Accessible formats and communication supports
- Producers of educational or training material – textbooks
- Educational libraries – print based resources

2016

Design of Public Spaces

- Recreational Trails and Beach Access Routes
- Outdoor Public Use Eating Areas and Play Spaces
- Exterior Paths of Travel
- Accessible Parking
- Obtaining Services

2020

Information and Communications

- Producers of educational or training material – supplementary print materials
- Educational libraries – multi-media / digital resources

2021

Information and Communications

- All internet websites and web content on those sites must conform with WCAG 2.0 Level AA, excluding live captioning

NOSM's plan for meeting the requirements of the applicable sections of the Integrated Accessibility Standard Regulation (IASR) is presented below.

7.1 2012 IASR Compliance Requirements

NOSM has implemented the following IASR Requirements:

Emergency Procedure, Plans or Public Safety Information (s. 13)

Safety is a priority for NOSM and is a shared responsibility with our host universities, Laurentian and Lakehead, and we strive to ensure that our facilities are safe for learners, visitors and employees. Emergency procedures, plans or public safety information available in an accessible format or with appropriate communication supports, upon request.

Workplace Emergency Response Information (s. 27)

Where NOSM is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

Electronic Fire Safety Plans are available on NOSM intranet in an accessible electronic format.

All employees will be surveyed asking if they require accommodations during an emergency situation and an individual emergency response plans will be developed if required.

7.2 2013 IASR Compliance Requirements

NOSM has implemented the following IASR Requirements:

Accessibility Policies (s. 3)

The NOSM Protocol for Accessibility is our Customer Service Policy and it has been updated to include the Integrated Accessibility Standards Regulation requirements and an organizational statement of commitment to meet the accessibility needs of persons with disabilities in a timely manner. The policy is consistent with:

- [Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 \(AODA\)](#)
- [Ontario Regulation 191/11 Integrated Accessibility Standards \(IASR\)](#)
- [Ontario Regulation 429/07 Accessibility Standards for Customer Service](#)
- [Human Rights Code, R.S.O. 1990, c. H.1](#)

Accessibility Plan (s.4)

The Multi-year Accessibility Plan was developed by the Accessibility Working Group and is posted on the public website. An annual status report on the progress of measures taken to implement NOSM's strategy to prevent and remove barriers and meet its requirements under this Regulation will be prepared and posted on the NOSM website. Opportunities for consulting with people with disabilities in reviewing and updating the plan will be explored and aligned with NOSM's strategic goal of enhancing collaboration and communication with our community partners.

Procurement (s.5)

NOSM will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except when it is not practical to do so. NOSM has updated its procurement templates to include an accessibility clause: NOSM is committed to the highest possible standards for accessibility. Supplier(s) must be capable to recommend and deliver, as appropriate for each Deliverable, accessible and inclusive Goods, Services or Facilities consistent with the Ontario Human Rights Code (OHRC), the Ontarians with Disabilities Act, 2001 (ODA) and Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its regulations in order to achieve accessibility for Ontarians with disabilities.

Self-Service Kiosks (s.6)

NOSM will continue to incorporate accessibility features when designing, procuring or acquiring self-service kiosks.

7.3 2013 Educational Institution Requirements

Section	Requirement	Action Plan	Progress to Date
15 (1)	Provide educational or training resources or materials in an accessible format upon request.	<ul style="list-style-type: none"> ▪ Educate and integrate a “Accessible Education¹” (Universal Design for Learning) approach for curriculum development. ▪ Consider developing a captioned media policy for all video content used for learners. 	<ul style="list-style-type: none"> ▪ Learner’s accommodation requests are currently managed through the Office of Students with Disabilities at their home university. ▪ NOSM will continue to provide accessible formats and communication supports upon request
15 (2)	Provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities	<ul style="list-style-type: none"> ▪ Remediate webadvisor and CEPD catalog to meet WCAG 2.0 Level AA. 	<ul style="list-style-type: none"> ▪ Learner Affairs will continue to assist students with accessibility student records and registration systems. ▪ An Accessibility Audit of the online registration system against WCAG was completed.
16	Provide educators with accessibility awareness training related to accessible program or course delivery and instruction.	<ul style="list-style-type: none"> ▪ Develop and deploy educators training curriculum. 	In progress.

¹ Accessible Education is a term used by the Council of Ontario Universities in 2012 Tool Kit for Accessibility. Accessible Education has been adopted to capture the value of two frameworks in improving the accessibility of university education: Universal Instructional Design (UID) and Universal Design for Learning (UDL). Both were informed by the architectural concept of Universal Design, which is “the design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design.” (Center for Universal Design, The Principles of Universal Design)

7.4 2014 Accessibility Initiatives

Section	Requirement	Action Plan	Progress to Date
7	Training	NOSM is committed to implementing a process to ensure that all employees, volunteers, all other persons who provide goods, services or facilities on behalf NOSM and persons participating in the development and approval NOSM's policies, are provided with appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, and are provided with such training as soon as practicable.	<ul style="list-style-type: none"> A training program and deployment plan is being developed.
11	Accessible Feedback Processes	<ul style="list-style-type: none"> Continue to respond to feedback in an accessible manner and provide accessible formats and communication supports upon request. 	<ul style="list-style-type: none"> Accessible feedback processes are described on the NOSM Accessibility web page.
14	New internet websites and web content conform with the Web Content Accessibility Guidelines (WCAG) 2.0, at Level A	<ul style="list-style-type: none"> Ensure that any new website development or redesign project includes WCAG 2.0 Level AA as a requirement. Include WCAG 2.0 requirements into RFP's and contracts for websites designed and developed by third party vendors / agencies. Provide training on creating accessible websites and understanding WCAG to all staff accountable for designing, procuring, developing or maintaining NOSM internet sites. 	<ul style="list-style-type: none"> NOSM Conducted a web accessibility audit to identify compliance of the current site with WCAG 2.0. An incremental website accessibility remediation plan is being developed. Web developers will attend full day web accessibility training course.
s.22 – 24	Recruitment, assessment, selection, job offers	<ul style="list-style-type: none"> Update current recruitment policy and practices to include notification and provision of accommodations during the recruitment process. 	<ul style="list-style-type: none"> In progress

Section	Requirement	Action Plan	Progress to Date
s.25, 26,28	Employee Accommodation	<ul style="list-style-type: none"> ▪ Develop a job accommodation policy and process for developing, documenting and reviewing individual accommodation plans. ▪ Create a centralized job accommodation fund to support the revised job accommodation policy. 	<ul style="list-style-type: none"> ▪ In Progress
s. 29	Return to work	<ul style="list-style-type: none"> ▪ The return to work process will be updated to include accommodation requirements 	<ul style="list-style-type: none"> ▪ In Progress
S 30 – 32	Performance Management, Career development, Redeployment	<ul style="list-style-type: none"> ▪ The Performance Development and Learning Plan will be revised to include requirements under these sections. 	<ul style="list-style-type: none"> ▪ In Progress.

7.5 2015 Accessibility Initiatives

Section	Requirement	Action Plan	Progress to Date
12	Accessible Formats and Communication Supports.	<ul style="list-style-type: none"> ▪ Develop a mechanism for requesting and fulfilling requests for accessible formats or communication supports. ▪ Strive to create accessible documents at source to minimize the need to create alternative formats. 	<ul style="list-style-type: none"> ▪ Staff from the Communications Unit has attended training on creating accessible documents.
18	Educational Libraries provide accessible print resources upon request	<ul style="list-style-type: none"> ▪ Develop a mechanism for requesting and fulfilling requests for accessible print resources. 	<ul style="list-style-type: none"> ▪ In Progress.

7.6 2016 – 2018 Accessibility Initiatives

Section	Requirement	Action Plan	Progress to Date
80	Design of Public Spaces	<ul style="list-style-type: none"> ▪ Include compliance with the Design of Public Spaces Standard in the redesign or redevelopment of any NOSM owned facilities. ▪ Include consultation with persons with disabilities in the design of new public spaces. ▪ Create an Accessible Housing Checklist. ▪ Build accessible, gender neutral washrooms on the NOSM campuses, as part of future construction or major renovation of physical facilities. ▪ Develop a plan to improve accessibility in clinical instructional spaces. 	<ul style="list-style-type: none"> ▪ In progress

8 Measuring Results

8.1 Accessibility Reports

NOSM will prepare accessibility reports for submission to the Ontario Government every 2 years with the first report due December 31, 2013. The report will include how we have met our goals, commitments and the legislative requirements for that period, as laid out in this Plan. The report will be available on the NOSM.ca website and will be provided in alternate formats upon request.

8.2 Reviewing Feedback

We will also monitor and evaluate any feedback we have received throughout the year related to accessibility. This information may be integrated into our accessibility reports. Any comments on our accomplishments and plans are welcome and will be considered in our ongoing accessibility planning.

8.3 Accessibility Feedback

We welcome inquiries and feedback about accessibility and NOSM's efforts at meeting the *Accessibility for Ontarians with Disabilities Act (AODA)* Customer Service Standard and the Integrated Accessibility Standards Regulation.

- Feedback regarding the way the Northern Ontario School of Medicine provides programs, goods and services to people with disabilities takes into consideration the fact that individuals with disabilities may require access to different forms of communication depending upon their disability.
- This means that feedback can be given to the School verbally, by email, by telephone, in writing, or through a third party. All feedback will be directed to the Office of Equity and Quality.
- Any complaints received will be dealt with by informing the individual, as well as the Unit or Portfolio associated with the accessibility or customer service issue in the delivery of a program, good or service.
- Individuals may expect a response to the feedback within five business days.

Accessibility Feedback
c/o Office of Equity and Quality
Northern Ontario School of Medicine
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Sudbury, ON
P3E 2C6

Email: accessibilityfeedback@nosm.ca

Phone: 705-662-7205

Alternate formats of this document are available free upon request.