

To All Members of the Accessible Public Transit Service Advisory Committee

Re: Accessibility Plan Update

Recommendation

That the recommendations set out below be RECOMMENDED to the Commission for consideration when approving the 2020-2025 Accessibility Plan.

1. Include a section in the updated plan that specifically addresses the removal and prevention of barriers.
2. Create a specific area on the corporate website dealing with accessibility where all information is housed and/or links to other areas of the site are provided. This will provide easier navigation on the site for people seeking information specific to accessibility.
3. Ensure that development of the actions plans relating to increased marketing and enhanced corporate communication include consultation with the Accessible Public Transit Service Advisory Committee.
4. Consider additional methods of communicating information with respect to policies and procedures to the public.
5. Seek additional information from the public with respect to what could be improved with the methods of communication in regard to temporary disruptions.
6. Prioritize the implementation of smart card readers on specialized service prior to the removal of paper tickets from use.
7. Provide the City of London, on an annual basis, a list of transit stops with no connecting sidewalks for inclusion in their accessibility plan.
8. Work with the Ontario Public Transit Association on the communications campaign regarding priority seating and implement the campaign as soon as it is available.
9. Utilize the additional service hours included in the multi-year budget to extend the service day to match the conventional transit service.
10. Undertake an assessment of the impacts and issues associated with a move to a shorter booking window. This assessment would include customer consultation and feedback from the Accessible Public Transit Service Advisory Committee.
11. Undertake an assessment of the issues and impacts associated with the implementation of on-line trip booking.
12. Continue to ensure that all major retrofits are assessed to ensure that the removal of any existing barriers is considered a priority piece of the project.
13. Undertake an assessment of the periods of highest non-accommodated on the specialized service to identify areas that would see the additional service hours best utilized. Consult with Accessible Public Transit Service Advisory Committee on the implementation of additional hours on the specialized service included in annual budgets, noting the conventional transit service planning process includes presentation to the Committee as well as a number of opportunities for feedback to be provided.
14. Consult the Accessible Public Transit Service Advisory Committee with respect to initiatives under consideration as part of the Integrated Services program.

Background

Consistent with the requirements of the Accessibility for Ontarians with Disabilities Act (AODA) regulations, the Commission's Accessibility Plan is scheduled for update. At the September 10, 2019 meeting, the Committee received a report providing an overview of the various initiatives included in the previous multi-year accessibility plan in an effort to begin discussion on initiatives that should be included in the next plan. Subsequent to the meeting, an online survey was posted to allow the public to provide feedback and a public drop in session was held. Summary details of the feedback received from the survey and drop in, in addition to that gathered from customer contacts are set out in Enclosure I.

The remainder of the report will be broken down by each section of the Integrated Accessibility Regulation as it relates to the provision of public transit services. Each section will provide a recap of the status of compliance, public feedback received and recommendations for items to be included in the next Five Year Accessibility Plan.

Accessibility - General

The general requirements included in the Integrated Accessibility Regulation (IAR) are set out in the table below with commentary regarding compliance.

Standard Requirement	Status of Compliance
Accessibility Plan	In progress – will be completed by Dec 2019
Procurement of Goods	Compliant
Training for Employees	Compliant

A comment received regarding the accessibility plan in general pointed out that the previous plan had no defined section that outlined plans to prevent and remove barriers. While the initiatives set out in the plan were all intended to remove/prevent barriers, the intent was not spelled out specifically.

With respect to the training requirement, all employees at London Transit have been trained on the AODA legislation as well as the Ontario Human Rights Code. While the satisfaction level with the training requirement from survey respondents was low, given the comments provided in this section of the survey, most dealt with training on specific issues such as the policy on service animals, which is dealt with later in the report.

Recommendations for Accessibility Plan

1. Include a section in the updated plan that specifically addresses the removal and prevention of barriers.

Information and Communications

The information and communications requirements included in the Integrated Accessibility Regulation (IAR) are set out in the table below with commentary regarding compliance.

Standard Requirement	Status of Compliance
Options to provide your feedback	Compliant
Formats of public reports	Compliant
Website and Web contents	Compliant
Information about emergency plans	Compliant

While all areas of this section are identified as compliant, a number of comments provided through public feedback were assessed for consideration.

With respect to the formats of public reports available, a suggestion to include large font and braille versions of public reports was included in the feedback. Any report that is posted publicly can be made available, upon request in Word format, which can easily have the font resized. Further, upon request, administration will work with customers to provide a format of a report that can readily be converted to braille.

Feedback with respect to the website indicated that information with respect to accessibility is difficult to find on the current site. The manner in which the corporate website is currently laid out does not include a general section on accessibility, rather, information is spread over a number of areas.

Commentary has also been received with respect to the manner in which various public information sessions are advertised to the general public, and whether they can be expanded upon.

Recommendations for Accessibility Plan

2. Create a specific area on the corporate website dealing with accessibility where all information is housed and/or links to other areas of the site are provided. This will provide easier navigation on the site for people seeking information specific to accessibility.
3. Ensure that development of the actions plans relating to increased marketing and enhanced corporate communication include consultation with the Accessible Public Transit Service Advisory Committee.

Customer Service

The customer service requirements included in the Integrated Accessibility Regulation (IAR) are set out in the table below with commentary regarding compliance.

Standard Requirement	Status of Compliance
Accessible customer service policy	Compliant – posted on Website
Policy re: service animals	Compliant
Policy re: support persons	Compliant
Notice of temporary disruptions	Compliant

Commentary was received with respect to the contents and awareness of both the service animal and support person policies. Recommendation 2 above would include these policies in the accessibility section on the corporate website.

Temporary disruptions generally relate to conventional service routes that have to be detoured as the result of road construction, accidents, etc. In these cases, temporary notices are installed at all affected bus stops, and bus Operators will notify customers as they board of the disruption. In addition, this information is available on the LTC real-time information and is communicated via the corporate Twitter account and on the LTC website. The automatic stop announcements on-board cannot be reprogrammed to respond to disruptions of this nature given their immediacy. Commentary was provided that indicated improvements could be made, however no details were provided.

Recommendations for Accessibility Plan

4. Consider additional methods of communicating information with respect to policies and procedures to the public.
5. Seek additional information from the public with respect to what could be improved with the methods of communication in regard to temporary disruptions.

Employment

The employment requirements included in the Integrated Accessibility Regulation (IAR) are set out in the table below with commentary regarding compliance.

Standard Requirement	Status of Compliance
Recruitment ads and options	Compliant
Recruitment selection process	Compliant
Informing employees of supports	Compliant
Workplace emergency information	Compliant
Individual accommodation plans	Compliant
Return to work process	Compliant
Career development and advancement	Compliant

The requirements relating to employment are all considered compliant, however as issues arise with employees, processes and procedures are modified to ensure that the employee's requirements are being met in a manner that is acceptable to all parties.

There are no recommendations with respect to the employment standards.

Public Transit Service - General

The public transit service general requirements included in the Integrated Accessibility Regulation (IAR) are set out in the table below with commentary regarding compliance.

Standard Requirement	Status of Compliance
Information on accessibility equipment	Compliant
Policy - non-functioning accessibility equip	Compliant
Free support person fares	Compliant

The feedback received with respect to all three of the policies above centred around a lack of awareness of same. Recommendation number 2 above would see these policies, all of which are compliant with regulations, included in the accessibility section of the corporate website. Additionally, recommendations number 3 and 4 would see an increased focus on raising public awareness regarding these policies.

There are no additional recommendations for inclusion in the accessibility plan relating to this section.

Conventional Transit Service

The conventional transit service requirements included in the Integrated Accessibility Regulation (IAR) are set out in the table below with commentary regarding compliance.

Standard Requirement	Status of Compliance
Alternative service	Compliant – Specialized Service
Fare parity with specialized service	Compliant – with exceptions
Accessible transit stops	Compliant – with exceptions
Priority seating area	Compliant

Policy regarding service disruptions	Compliant
Pre-boarding announcements	Compliant
On-board announcements	Compliant
Accessible buses	Compliant

The requirement for fare parity is classified as compliant with exceptions given the ability to utilize smart cards on the specialized service has not been fully implemented. The vendor for the smart card system is in the late development stages of a hand-held interface to the smart card system that will be tested in 2020. Subsequent to testing, the most appropriate method of allowing smart card use onboard specialized service vehicles will be implemented.

Accessible transit stops are listed as compliant with exceptions given there are approximately 171 conventional service stops that have cement pads and curb cuts, but no connecting sidewalks. Administration shares a list of these stop locations with the City of London to ensure these locations are included in their sidewalk program.

Priority and Courtesy seating continue to cause confusion and frustration for customers. The requirement for a priority seating area on board conventional buses is set out in the AODA regulation. While the required seating area is provided on every bus, London Transit, consistent with transit systems across the province, operates on a first come first served basis, meaning there are no “reserved” seats on the service. This has led to frustration with respect to strollers and passengers crowding the priority seating area on busy routes such that the bus is unable to accommodate a passenger utilizing a mobility device. LTC Operators are trained to ask, in a general manner, if passengers are able to move from the priority seating area, however, they are not expected to ask a customer directly, or order a customer to move. Given concerns with respect to the crowding in the priority seating area, London Transit retrofitted the entire fleet to have perimeter seating all the way to the back doors of the bus, which opens up more area for strollers to move toward the back of the bus. This has alleviated some of the issues, however conflict continues to occur. Additionally, the Ontario Public Transit Association is working in cooperation with the Accessibility Directorate on a communications campaign intended to raise awareness of a number of requirements including priority seating. It is anticipated this campaign will be finalized by the spring of 2020 for implementation.

The policy regarding service disruptions is another that would be included in the accessibility section of the corporate website.

In addition to the specific regulations, feedback included several comments with respect to training for LTC Operators relating to when to lower the bus and deploy the ramp, waiting until customers are seated prior to leaving the stop, etc. The operating procedures with respect to these issues are further examples of those that would be included in the accessibility section of the corporate website as well as the marketing and communications campaigns referenced in recommendations 2, 3 and 4 above.

Recommendations for Accessibility Plan

6. Prioritize the implementation of smart card readers on specialized service prior to the removal of paper tickets from use.
7. Provide the City of London, on an annual basis, a list of transit stops with no connecting sidewalks for inclusion in their accessibility plan.
8. Work with the Ontario Public Transit Association on the communications campaign regarding priority seating and implement the campaign as soon as it is available.

Specialized Transit Service

The specialized transit service requirements included in the Integrated Accessibility Regulation (IAR) are set out in the table below with commentary regarding compliance.

Standard Requirement	Status of Compliance
Clear eligibility criteria/temporary eligibility	Compliant
Application process	Compliant
Fare parity with conventional service	Compliant – with exceptions
Access to service for visitors	Compliant
Service hour parity with conventional	Compliant – with exceptions
Booking process	Compliant

The eligibility application and process are included on the corporate website under the specialized service section, however would be subject to recommendation 2, which would see links to this information also included under the newly created accessibility section of the corporate website.

The fare parity requirement was discussed earlier under the conventional transit section, with recommendation 6 calling for the implementation of smart card readers on-board specialized vehicles to allow for the use of smart cards.

The service hour parity with conventional service is classified as compliant with exceptions, noting the exceptions relate to the changes in service hours on Sunday mornings (9 routes on conventional) and service to 1am (9 routes on conventional). Given the entire conventional service does not operate on these extended hours, changes to the operating hours on the specialized service have not yet been made.

A number of comments were received with respect to dissatisfaction with the ability to book trips and the time spent waiting in the queue when calling to book a trip. The multi year operating budget, approved by the Commission includes the addition of 6,000 annual hours of service to the specialized budget in an effort to continue to expand the availability of service.

The 2018 Voice of the Customer survey also identified dissatisfaction with the current three-day booking window, noting customers would like to see a move to a shorter window.

Recommendations for Accessibility Plan

9. Utilize the additional service hours included in the multi-year budget to extend the service day to match the conventional transit service.
10. Undertake an assessment of the impacts and issues associated with a move to a shorter booking window. This assessment would include customer consultation and feedback from the Accessible Public Transit Service Advisory Committee.
11. Undertake an assessment of the issues and impacts associated with the implementation of on-line trip booking.

Public Spaces

The public spaces requirements included in the Integrated Accessibility Regulation (IAR) are set out in the table below with commentary regarding compliance.

Standard Requirement	Status of Compliance
Ticket office at 150 Dundas Street	Compliant
Office at 450 Highbury	Compliant
Parking at 450 Highbury	Compliant

All requirements relating to the public spaces in operation by London Transit are compliant, noting that, in some cases, the requirement does not require retrofit but rather are tied to major renovations.

Comments with respect to the ticket office at 150 Dundas include the counter not being accessible to a customer in a mobility device as well as the lack of accessible door openers on both doors. Both doors at the ticket office have been equipped with accessible door openers subsequent to the issue being raised in the summer of 2019 by a customer. Should the ticket office undergo a major renovation, the counter height will be adjusted to meet the requirements, until then, ticket office representatives will continue the current practice which is to meet the customer on the other side of the glass to conduct the transaction.

Recommendations for Accessibility Plan

12. Continue to ensure that all major retrofits are assessed to ensure that the removal of any existing barriers is considered a priority piece of the project.

Additional Non-Regulatory Items

In addition to those mentioned above, a number of initiatives are included in the 2019-2022 Business Plan that related to the accessibility of London's public transit services, and as such are being recommended to be included in the Accessibility Plan as well.

Notwithstanding the significant investments in additional service over the past five years (13% increase in conventional hours and 30% increase in specialized hours), feedback from the public continues to include requests for additional service. The 2020-2023 multi-year operating budget calls for the addition of approximately 18,000 service hours each year to the conventional service, and an additional 6,000 service hours each year to the specialized service.

Another important initiative, which will in part address the demand on the specialized service is the assessment and implementation of programs intended to integrate the conventional and specialized services. Various programs are in place across the province that see the two systems being utilized together in an effort to increase the availability of service in the community. This initiative will include consideration of the role that alternative service delivery models being piloted may play in increasing the availability of accessible public transit services to difficult to serve areas.

Recommendations for Accessibility Plan

13. Undertake an assessment of the periods of highest non-accommodated on the specialized service to identify areas that would see the additional service hours best utilized. Consult with Accessible Public Transit Service Advisory Committee on the implementation of additional hours on the specialized service included in annual budgets, noting the conventional transit service planning process includes presentation to the Committee as well as a number of opportunities for feedback to be provided.
14. Consult the Accessible Public Transit Service Advisory Committee with respect to initiatives under consideration as part of the Integrated Services program.

Summary

Subsequent to review and discussion by the Accessible Public Transit Service Advisory Committee, the 2020-2025 Accessibility Plan will be updated to include the recommendations and forwarded to the Commission for review and consideration.

Enclosure

I – Summary of Public Feedback – AODA Accessibility Requirements

Recommended by:

Kelly S. Paleczny
General Manager

Summary of Public Feedback – AODA Accessibility Requirements

Requirement	Not Satisfied	Satisfied	N/A
General			
Accessibility Plan	33%	53%	13%
Procurement of Goods	28%	45%	28%
Training for Employees	45%	38%	17%
Comments provided:			
<ul style="list-style-type: none"> • The current Accessibility Plan does not outline strategy to prevent and remove barriers • American Sign Language (ASL) training for all employees • Bi-annual retraining of all employees 			
Information & Communications			
Options to provide your feedback	34%	59%	7%
Formats of public reports	32%	54%	14%
Website and Web contents	25%	68%	7%
Information about emergency plans	46%	29%	25%
Comments provided:			
<ul style="list-style-type: none"> • More formats available for public reports, such as large print and Braille • Public information is difficult to find intuitively on the website • Participation in feedback events for transit rarely ever get advertised on all forms of public transit (including paratransit) 			
Customer Service			
Posted accessible customer service policy	43%	47%	10%
Policy re: service animals	30%	47%	23%
Policy re: support persons	37%	40%	23%
Notice of temporary disruptions	43%	43%	13%
Comments provided:			
<ul style="list-style-type: none"> • Some of the LTC employees are downright rude and very discriminatory towards individuals simply because they require the use of a service dog. • There isn't a reasonable response time for many complaints, concerns or questions • Have better information about service delays and interruptions • Wasn't aware of support person policy 			
Employment			
Recruitment ads and options	33%	22%	44%
Recruitment selection process	30%	26%	44%
Informing employees of supports	19%	22%	59%
Workplace emergency information	12%	23%	65%
Individual accommodation plans	19%	19%	63%
Return to work process	15%	19%	67%
Career development and advancement	19%	19%	63%
Public Transit Services			
Information on accessibility equipment	33%	44%	22%
Policy - non-functioning accessibility equip	41%	30%	30%
Free support person fares	37%	37%	26%
Conventional Service			
Alternative service	57%	30%	13%
Fare parity with specialized service	40%	43%	17%
Accessible transit stops	50%	37%	13%
Priority seating area	55%	31%	14%
Policy regarding service disruptions	37%	40%	23%
Pre-boarding announcements	40%	40%	20%
On-board announcements	41%	45%	14%
Accessible buses	31%	52%	17%
Comments provided:			
<ul style="list-style-type: none"> • Better planning on drivers leaving stops early making it harder with people who have disabilities to make it to the bus • Making sure all routes are available on Sundays and stat holidays • Using mystery shoppers to assess services to ensure drivers are adhering to needs of disabled and physically challenged users (start/stop, quick braking, moving before everyone is seated) 			

- People who have balance problems should be able to sit in the priority seating area and not for strollers
- The customer service policy should address how people travel with cargo on buses but also ensure access.
- The customer service policy should allow for drivers to assist people with disabilities onto conventional transit buses when they get stuck in the snow.
- Move and accommodate others that need the accessible seating
- Bus announcements not working and plan for addressing same
- Priority should be given to wheelchair users
- Bus should be lowered/ramp deployed upon request
- Too many people being left behind at bus stops since the priority seats are filled with strollers and cargo
- Most stops don't have shelters
- Shelters can't accommodate larger assistive devices such as scooters and larger wheel chairs
- There are stops without a pad so people with assistive devices are forced to block sidewalks while waiting for the bus
- It's difficult to reach the stop requested strings, bus drivers do not always pull right up to the curb which makes it difficult to safely board and disembark the bus.

Specialized Service	Not Satisfied	Satisfied	N/A
Clear eligibility criteria/temporary eligibility	22%	48%	30%
Application process	31%	46%	23%
Fare parity with conventional service	30%	48%	22%
Access to service for visitors	30%	33%	37%
Service hour parity with conventional	32%	43%	25%
Booking process	50%	25%	25%

Comments provided:

- Increased service
- There is a huge backlog of calls every morning
- Is it possible to book under 3 days?
- Not enough transportation for medical patients and call in and booking arrangements not adequate
- Not enough room for traveller and 2 companions at times
- Online booking please
- Addressing the particular needs of dialysis patients that account for a large percentage of the rides
- Not enough service hours during peak times
- There needs to be cameras like there are on conventional buses to ensure the safety and security of passengers and drivers
- Often have to book rides at inopportune times since rides are unavailable in the morning or evenings

Public Spaces	Not Satisfied	Satisfied	N/A
Ticket office at 150 Dundas Street	28%	62%	10%
Office at 450 Highbury	10%	55%	34%
Parking at 450 Highbury	7%	38%	55%

Comments provided:

- More effective snow removal during winter months
- Get the City to shovel down to the bare sidewalk to stops
- Working with the city to ensure cleared paths of travel to bus stops, facilities, etc. especially when it comes to weather, construction, etc.
- More effective policies regarding removal of snow and ice at bus stops.
- 150 Dundas - Needs to be larger, easy way in and out with actuators on both doors
- 150 Dundas - limited to no seating for those that can't stand long while waiting to be served
- 150 Dundas - service counters too high for wheelchair