



# **Multi-year Integrated Accessibility Plan**

Last updated: Jan 1, 2014

Submitted by: Lisa Simmonds-Kim and Nicole Harrison  
Co-chairs, AODA Committee, Canadian Market Area  
December 24, 2013

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## **Narrative**

State Farm has prepared the following multi-year plan to fulfill our organizational obligations under the Accessibility for Ontarians with Disabilities Act (AODA), 2005, and the Integrated Accessibility Standards Regulation (IASR), Ont. Reg. 191/11. This document outlines the deliverables and activities that will be completed over the next several years.

At State Farm, we are committed to making accessibility throughout the organization a reality and all employees of our company play a role in creating and developing accessibility and inclusivity.

Recognizing that the AODA obligations are extremely important to our employees and the communities that we do business in, State Farm has taken a strategic approach to the successful implementation of all requirements. This involves engagement from all employees and intentional integration of several key departments.

In this multi-year plan, cross-functional workgroups led by leadership, have been formed to ensure our goals are met and our organization is in compliance with the legislation. State Farm has established the following committee with the following parameters:

### **State Farm AODA Committee:**

The committee is comprised of leaders and employees of State Farm who champion accessibility at State Farm and are accountable for the successful implementation of the accessibility initiatives as they relate to the AODA Accessibility Standards. The State Farm organization's AODA Administrator is accountable for the oversight of the committee and execution of the organization's accessibility strategy.

The Committee is responsible for developing strategies and a multi-year plan that will address the requirements of the accessibility legislation and regulations. Further, the committee will update and make changes to the multi-year plan as required.

<b>Multi-year Accessibility Plan Chairs (Jan 2014)</b>	<b>Superintendent–Agency Services Administrative Services Manager</b>
<b>Employment Standards (2013 &amp; 2014)</b>	<b>Human Resources Representative</b>
<b>Building Standards (various dates)</b>	<b>Administrative Services Manager</b>
<b>Information/Communication Standards (2014)</b>	<b>Compliance Analyst Marketing Analyst Director-Channel Support</b>
<b>Training/Compliance Accountabilities (various)</b>	<b>Underwriting Team Manager State Farm Pay Plan Supervisor</b>

The multi-year plan is organized to address the IASR 191/11 in the order that its parts actually appear. Comments, analysis, resolutions and any identified gaps in relation to upcoming AODA/IASR requirements will be discussed. This plan will remain a living document that will continue to be developed and enhanced in the years ahead.

## Ontario Regulation 191/11 – Integrated Accessibility Standards Part I – General – Section 7 Training

[7. \(1\)](#) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the *Human Rights Code* as it pertains to persons with disabilities to,

- (a) all employees, and volunteers;
  - (b) all persons who participate in developing the organization's policies; and
  - (c) all other persons who provide goods, services or facilities on behalf of the organization. O. Reg. 191/11, s. 7 (1).
- (2) The training on the requirements of the accessibility standards and on the *Human Rights Code* referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers and other persons. O. Reg. 191/11, s. 7 (2).
- (3) Every person referred to in subsection (1) shall be trained as soon as practicable. O. Reg. 191/11, s. 7 (3).
- (4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis. O. Reg. 191/11, s. 7 (4).
- (5) The Government of Ontario, the Legislative Assembly, every designated public sector organization and every large organization shall 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. 7 (5).
- (6) Obligated organizations shall meet the requirements of this section in accordance with the following schedule:
1. For the Government of Ontario and the Legislative Assembly, January 1, 2013.
  2. For large designated public sector organizations, January 1, 2014.
  3. For small designated public sector organizations, January 1, 2015.
  4. For large organizations, January 1, 2015.
  5. For small organizations, January 1, 2016. O. Reg. 191/11, s. 7 (6).

### **Legislative requirements:**

By January 1, 2015, large organizations such as State Farm are to be in compliance with this section.

### **Checkpoints:**

Currently, State Farm is compliant with AODA, 2005 training requirements. Since January 1, 2012, all Canadian employees, whether serving Ontarians or other Canadian customers, have been required to complete our on-line AODA accessibility training. Also, all new hires have been required to complete the accessibility training as part of the onboarding process. Finally, all USA employees who serve Ontario customers, from our Customer Care Centers, for example, have also been required to complete the training. The AODA Administrator has been monitoring and documenting training completion for the organization.

The IASR 191/11 updates accessibility training. IASR introduces a Human Rights Code element to the training and it also requires that accessibility standard training be appropriate to the duties of the employee. The updated training requirements are effective January 1, 2015.

The AODA Committee must continually review our accessibility training curricula and processes to ensure we are keeping pace with training changes and are in compliance with AODA/IASR.

**Gaps:**

We have already begun initial consultations with a group drawn from Human Resources, Learning and Development, the Corporate Learning Chairs, among others, to determine how we can enhance our existing AODA training to include the prescribed changes. We need to consider which roles may require customized accessibility training and then develop that training to suit those roles. Further, IASR indicates that specific changes are required for those employees involved in recruiting and interviewing new hires. There are also changes in how we notify both new hires and existing employees about workplace accommodations as well as the recording of such accommodations. In short, there are a number of HR updates in regard to accessibility and HR has started working with Legal and Corporate HR to make the necessary changes. Once the updated training program is finalized, we need to consider if, and how, we would roll out the updated training to our existing employees.

The training team must identify and pursue the following: the training processes; any roles that require specific training; frequency of training; training manuals or resources; accountability and confirmation of training completion; creation of timelines to ensure implementation by January 1, 2015.

## Ontario Regulation 191/11 – Integrated Accessibility Standards Part II – Information and Communications Standards

**Section 9: Provides Definitions and Exceptions for Part II** (which apply to all obligated organizations)

### **Section 10: Application**

This section states that sections 9, 11, 12, and 13 apply to all obligated organizations

### **Section 11: Feedback**

#### ***Current State:***

#### ***Accessibility Feedback***

The public is notified on Statefarm.ca on ways to provide accessibility feedback. Questions and comments from the public about State Farm's accessibility can be submitted in the following ways:

- In writing mailed to:  
Office of the Complaint Liaison Officer/Disability Services Feedback  
State Farm Insurance  
333 First Commerce Dr.  
Aurora, Ontario L4G 8A4
- By fax at: (905) 750-4035.
- By telephone toll free at 1-877-370-3276
- By e-mail, [StateFarmAODA@statefarm.com](mailto:StateFarmAODA@statefarm.com).

Customers can expect to hear back within ten business days.

The Complaint Liaison Office will work with Administrative Services and Human Resources on AODA responses. Such inquiries and the resolution to each will be recorded in the Enterprise Complaint Tracking (ECT) system.

#### ***Where the legislation indicates we need to get to:***

By January 1, 2015, large organizations such as State Farm are to be in compliance with this section.

#### ***What are we doing to get there?***

Continually reviewing processes to ensure we are keeping pace with changes and remain in compliance with legislation.

#### ***Gaps:***

None

## **Section 12: Accessible formats and communication supports**

### ***Current State:***

State Farms commitment to excellence in serving all customers including people with disabilities is outlined under the “Accessibility for Ontarians with Disabilities Act (AODA, 2005)” on statefarm.ca. Below is State Farm’s commitment regarding communication:

- **Communication** - We communicate with people with disabilities in ways that take into account their disability. We train our employees who serve our customers on how to interact and communicate with people with various types of disabilities.
- **Telephone services** – We are committed to providing fully accessible telephone service to our customers. We train staff to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly. If communication over the telephone is not suitable or available, State Farm will offer to communicate with customers in other ways including e-mail, TTY and relay services.
- **Documents** – We are committed to providing accessible invoices and other documents to all of our customers. Such documents will be provided in alternative format upon request that takes the person’s disability into account. We will answer any questions customers may have about the content of the invoice in person, by telephone or email.

### ***Where the legislation indicates we need to get to:***

By January 1, 2016, large organizations like State Farm are to be in compliance with this section.

### ***What are we doing to get there?***

Continually reviewing processes to ensure we are keeping pace with technology and in compliance with the applicable legislation. We’re working to implement Web Content Accessibility Guideline 2.0 Level A on all State Farm websites and related digital content.

### ***Gaps:***

None

## **Section 13: Emergency Procedure, plans or public safety information**

### ***Current State:***

This section refers to obligated organizations that prepare emergency procedures, plans or public safety information and makes this information available to the public. State Farm is not in the business of providing emergency procedures to the public; however, the company does have business continuity and emergency evacuation plans that are kept within each department.

### ***Where the legislation indicates we need to get to:***

State Farm met the requirements of this section by January 1, 2012.

## **Section 14: Accessible websites and web content:**

### ***Current State:***

- State Farm's websites, statefarm.com® and statefarm.ca, collectively have hundreds of pages of public-facing web content that an Ontarian resident may access.
- Some pages are older, some are newer and they may be written to different Web Content Accessibility Guideline (WCAG) levels
- Web content is constantly being updated with new branding, up-to-date links and with changes to reflect new and updated products, educational and marketing material.
- Ontario customers (both policyholders and non-policyholders) primarily access State Farm information through statefarm.ca and statefarm.com, State Farm agent microsites and the customer landing pages hosted on statefarm.com.
- Electronic forms, on-demand documents such as historical billing information and stored communications such as bills and renewal notices are available to customers who have enabled their online account through statefarm.ca and statefarm.com.

### ***Where the legislation indicates we need to get to:***

- By January 1, 2014, large organizations like State Farm are to begin publishing new and/or substantially refreshed websites at WCAG 2.0 Level A.
- By January 1, 2021, large organizations like State Farm must have all their web and digital content upgraded to WCAG 2.0. Level AA.

### ***What are we doing to get there?***

- The guidelines immediately above anticipate that all websites for a given organization will not necessarily be upgraded simultaneously. Until 2021, organizations are allowed to host an ongoing mix of web and digital material at different WCAG guidelines.
- State Farm has decided that all of its web and digital content should be upgraded to WCAG 2.0 Level A for all customers served in Canada and the USA. Systems and business resources initiated a project that has been working through 2013 to evaluate both the existing content and new content described above against the WCAG 2.0 Level A standard. Upgraded content will start becoming available to our customers and the public beginning January 1, 2014.
- Several employees in Canada and our corporate head office have been allocated full-time to reviewing Canadian content for compliance with WCAG 2.0 level A.
- The goal of these efforts is to complete the project during 2014.

### ***Gaps:***

None

### ***Some parts of section 14 of IASR 191/11 do not apply to State Farm.***

- Parts 1 thru 3 apply only to the Government of Ontario and the Legislative Assembly.

### **Section 15: Education and training resources and materials, etc.**

Section 15 does not apply to State Farm. This section is for every obligated organization that is an educational or training institution.

### **Section 16: Training to educators**

Section 16 does not apply to State Farm. This section is for obligated organizations that are school boards, or educational or training institutions.

### **Section 17: Producers of educational or training materials**

Section 17 does not apply to State Farm. This section is for obligated organizations that are a producer of educational or training textbooks for educational or training institutions.

### **Section 18: Libraries of education and training institutions**

Section 18 does not apply to State Farm. This section is for libraries of educational or training institutions.

### **Section 19: Public Libraries**

Section 19 does not apply to State Farm. This section is for every obligated organization that is a library board.

## **Part III – Employment Standards**

### **Section 20: Scope and interpretation**

This section states that the Employment Standards apply to obligated organizations, such as State Farm, and apply to employees, but not to volunteers and other non-paid individuals.

### **Section 21: Schedule**

By January 1, 2016, large organizations such as State Farm are to be in compliance with this section.

### **Section 22: Recruitment, general**

#### ***Where the legislation indicates we need to get to:***

We will be required to notify our employees and the public about the availability of accommodation in our recruitment process for applicants with disabilities.

#### ***Current State:***

- There is language in statefarm.ca advising of the availability of accommodation in the recruiting process but it is not easy to find.
- There is no formal notification given to employees during the recruiting process for internal postings that accommodations are available.

#### ***What are we doing to get there?***

We need to make more prominent in statefarm.ca the language regarding the availability of accommodation in our recruitment process for applicants with disabilities.

Specifically:

- enlarge the font re "Reasonable Accommodation Assistance".
- add relevant language in the link, "An Equal Opportunity Employer"

HR Recruiting representative will identify the appropriate contact and have the changes completed.

### **Section 23: Recruitment, assessment or selection process**

#### ***Where the legislation indicates we need to get to:***

When an individual is selected to participate in an assessment or selection process as part of the recruitment process, we will be required to advise that individual that accommodations are available upon request in relation to the materials or processes to be used.

#### ***Current State:***

External candidates who are to complete a pre-employment test are notified of the availability of accommodations. Internal candidates are not formally advised. In practice, reasonable accommodations are made if requested.

***What are we doing to get there?***

State Farm is looking into whether:

- language informing of the availability of accommodation needs to be added to all internal Canadian job postings/communications;
- Canadian candidates may be asked, as are US candidates, if they can perform the essential duties of the job with or without accommodation.

**Section 24: Notice to successful applicants**

***Where the legislation indicates we need to get to:***

When making job offers, we will need to notify the successful applicant of our policies for accommodating employees with disabilities.

***Current State:***

A script is used by HR recruiters when communicating verbally the news to external candidates that they have been selected for a job opportunity. There is no language within that script or within State Farm's written offers of employment advising of our accommodation process.

***What are we doing to get there?***

State Farm is reviewing the script and offer letters we currently use for external candidates as well as the equivalent for internal candidates, and conducting a project to review and update these documents.

**Section 25: Informing employees of supports**

***Where the legislation indicates we need to get to:***

We will be required to inform all employees of the policies we have in place to support employees with disabilities, including but not limited to our policy on the provision of job accommodations that take into account an employee's accessibility needs due to disability. New employees will need to receive this information as soon as practicable after they begin employment. Changes in such policies must be communicated to all employees.

***Current State:***

The existing policy addressing this requirement is within the Canadian HR manual chapter titled "Employment Policy", however it speaks only to our commitment to hiring the best qualified people for opportunities, and that discrimination for a number of personal characteristics including disability will not be tolerated. It also includes a statement of commitment to comply with the letter and the spirit of all applicable laws.

***Gaps:***

The policy contains no mention of our commitment to providing accommodation to support employees with disabilities.

***What are we doing to get there?***

Local HR will work with Corporate HR subject matter experts to:

- make needed modifications to the Employment Policy to incorporate the new requirements
- ensure that our onboarding program includes information about our policy regarding accommodations for employees with disabilities. The onboarding site for managers with new employees needs to contain direction to managers that as part of their normal process they need to follow up with the new employee within 2 weeks of their start date to see how they are doing, whether they have the equipment, training, and/or other resources they may need.
- update the Front Line Manager Bootcamp curriculum (a course for new-to-role front line managers) to ensure this topic is covered and make any needed edits to comply with AODA/IASR.

**Section 26: Accessible formats and communication supports for employees**

***Where the legislation indicates we need to get to:***

If an employee with a disability requests it, we will be required to consult with that employee to provide or arrange for a suitable accessible format and communication supports for information that is:

- needed for the employee to perform their job
- generally available to employees in the workplace.

***Current State:***

Our practice is to handle such requests by working with our Loss Prevention Specialists if an accommodation is required for equipment or software for the purpose of making information accessible.

***What are we doing to get there?***

The updates mentioned under section 25 above to the Onboarding site for Management and the Front Line Manager Bootcamp curriculum will cover this section.

**Section 27: Workplace emergency response information – required to be met by January 1, 2012**

***Where the legislation indicates we need to get to:***

- We will be required to provide individualized workplace emergency response information for those employees State Farm is aware have a disability requiring accommodation and who need individualized information.

- When applicable and with the employee's consent, such individualized information shall be provided as soon as practicable to the person(s) designated by State Farm to provide assistance to the employee during an emergency.
- Such individualized information will need to be reviewed any time:
  - The employee moves to a different location in the organization;
  - When the accommodation needs or plans are reviewed; and
  - When State Farm reviews our general emergency response policies.

***Current State:***

When the Loss Prevention Specialists (LPSs) within Administrative Services have been notified about employees requiring an accommodation and/or individualized emergency response information, their practice has been to meet with the employee to gain an understanding of the needs and work together to develop a suitable plan.

***Gaps:***

None. Although we have provided information as called for in the regulation, we are seeking to have a more formally documented procedure for this step.

***What are we doing to get there?***

Currently the Loss Prevention Specialists are working on formalizing a plan.

**Section 28: Documented individual accommodation plans**

***Where the legislation indicates we need to get to:***

We will need to have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process is to include:

- The manner in which State Farm can request an evaluation by an outside medical or other expert, at our expense, to assist us in determining if accommodation can be achieved and, if so, how accommodation can be achieved;
- The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee;
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability;
- Individual accommodation plans shall,

- if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;
- if required, include individualized workplace emergency response information, as described in section 27; and
- identify any other accommodation that is to be provided.

***Current State:***

When employees have requested an accommodation due to a disability, our practice is for the manager, Employee Health Services (EHS), and if applicable, Loss Prevention Specialists, to work with that employee to identify and if necessary obtain medical documentation, then identify and provide reasonable accommodation. That may take the form of equipment, software, adjustments to job functions or responsibilities, etc.

***Gap:***

The Attendance Support Process Framework partially fulfills the obligation set out in this section but is not accessible online to managers or employees. It does not fully capture our current practices and is not detailed to the degree required.

***What are we doing to get there?***

Corporate counsel will work with local counsel, EHS, and the appropriate Corporate HR subject matter expert to create a written process that will meet the requirements listed above. It will be incorporated into the Canadian HR manual. Training and communication needs will be addressed once the process is formalized.

**Section 29: Return to work process**

***Where the legislation indicates we need to get to:***

We will be required to develop and have in place a documented return to work process for our employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

The return to work process shall,

- (a) outline the steps State Farm will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and
- (b) use documented individual accommodation plans, as described in section 28, as part of the process.

***Current State:***

The “Paid Sick Leave (PSL) and Medical Leave (ML)” chapter of our HR Policy Manual documents our return to work process in detail. Individual accommodation plans are documented by way of written correspondence between EHS, the employee, and his/her manager.

***What are we doing to get there?***

We are in compliance with this section, except in the requirement of having a process as described in section 27, developing a process to provide individualized workplace emergency response information where applicable. Meeting the requirement in that section will satisfy the requirement in this one.

### **Section 30: Performance management**

#### ***Where the legislation indicates we need to get to:***

An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.

(2) In this section,

“performance management” means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.”

#### ***Current State:***

State Farm’s Performance Management philosophy and process are generally outlined in the HR Policy Manual chapter “Performance Management”. It documents our goal of fostering an environment free from bias, where open communication thrives and developmental opportunities exist. It captures our commitment to coaching and developing employees to perform at their best and rewarding and recognizing employees for their accomplishments.

In practice, any time an employee identifies a disability requiring accommodation in the workplace, a referral is made to EHS, a process described in State Farm’s Attendance Support Process Framework. Documentation is requested and the situation evaluated by EHS, in consultation with the HR and management.

#### ***What are we doing to get there?***

Corporate counsel is consulting with local counsel about how this section may be interpreted. Our practices are compliant with current laws.

### **Section 31: Career development and advancement**

#### ***Where the legislation indicates we need to get to:***

An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.

(2) In this section,

“career development and advancement” includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization 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.

***Current State:***

State Farm's commitment to employee development and our processes are outlined in the section of the HR Policy Manual: "Career Development". We take into account the accessibility needs of all employees, including those interested in career development and advancement opportunities.

***What are we doing to get there?***

Corporate counsel is consulting with local counsel about how this section may be interpreted so that we can evaluate whether any gap may exist. It appears there is no gap according to our understanding of this section.

**Section 32: Redeployment**

***Where the legislation indicates we need to get to:***

An employer that initiates redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

(2) In this section,

"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.

***Current State:***

Our philosophy and process regarding "redeployment" as defined by this section is outlined in the HR Policy Manual Chapter "Employee Transition". Our stated commitment is to make reasonable efforts, consistent with sound business practices, to facilitate continued employment of qualified employees.

# Ontario Regulation 191/11 – Integrated Accessibility Standards Part IV.1 – Design Of Public Spaces Standards (Accessibility Standards for the Built Environment)

## DEFINITIONS, APPLICATION AND SCHEDULE

### Section 80.1: Definitions

This section provides Definitions for Part IV.1

#### ***Current State:***

This applies to public spaces that are newly constructed or redeveloped at owned State Farm facilities in Ontario (Aurora Operations Centre and London Operations Centre).

#### ***Where the legislation indicates we need to get to:***

We are required to apply these definitions to the design of Public Spaces

#### ***What are we doing to get there?***

State Farm will apply these definitions to the design of its Public Spaces

#### ***Gaps:***

None. We are currently compliant with all by-laws and building codes.

### Section 80.2: Application

This section states that, unless otherwise specified, this Part applies to public spaces that are newly constructed or redeveloped on and after January 1, 2017.

(2) Except as otherwise specified, this Part applies to obligated organizations.

(3) In this Part, where there's a reference to an obligated organization, it is a reference to the obligated organization that constructs or redevelops any public space to which this Part applies, and not to any other obligated organization that may have provided a permit, approval or other authorization or that may have an interest in the land where the thing to which the standard or requirement applies is located.

#### ***Current State:***

This Part applies to public spaces that are newly constructed or redeveloped at State Farm facilities after January 1, 2017.

#### ***Where the legislation indicates we need to get to:***

Public spaces that are newly constructed or redeveloped on and after January 1, 2017 shall meet the requirements of this act.

#### ***What are we doing to get there?***

Public spaces that are newly constructed or redeveloped shall meet the requirements of this act.

***Gaps:***

Leased State Farm facilities may not currently meet the requirements of this Act. However, State Farm will contact all lessors and make them aware of our expectation of compliance with the requirements of this Act.

**Section 80.3: Transition**

This section states that, where an obligated organization has entered into a contract on or before December 31, 2012, to construct or redevelop any public space to which this Part IV.1 applies and the contract does not meet the requirements of this Part, the obligated organization is not required to meet the requirements of this Part in honouring the existing contract.

***Current State:***

All future contracts to construct or redevelop any public space at owned State Farm facilities in Ontario will meet the requirements under this section.

***Where the legislation indicates we need to get to:***

All public spaces that are newly constructed or redeveloped on and after January 1, 2017 must meet the requirements of Part IV.1.

***What are we doing to get there?***

Any contract entered into after December 31, 2012 to construct or redevelop any public space must meet the requirements under Part IV.1.

***Gaps:***

There is the potential that contracts entered into after December 31, 2012 might not meet the requirements of Part IV.1. We will review and take appropriate action.

**Section 80.4: Slope Ratios**

This section states that, the ratios with respect to the slope of a surface mean that for every one unit of elevation expressed as the first number in the ratio, the user has the second number in the ratio in length with which to negotiate one unit of elevation

***Current State:***

All future contracts to construct or redevelop any public space at owned State Farm facilities in Ontario will use this formula to determine slope ratios.

***Where the legislation indicates we need to get to:***

Slope ratios must be determined in this fashion for all public spaces that are newly constructed or redeveloped on and after January 1, 2017.

***What are we doing to get there?***

Any contract entered into after December 31, 2012 to construct or redevelop any public space will meet the requirements under Part IV.1.

***Gaps:***

There's the potential that the slope has not been determined in this fashion for contracts already in place. We will review and take appropriate action.

**Section 80.5: Schedule**

By January 1, 2017, large organizations like State Farm are to be in compliance with the requirements set out in Part IV.1

***Current State:***

State Farm shall meet the requirements set out in Part IV.1 on or after January 1, 2017 when constructing or redeveloping any public space to which Part IV.1 applies.

***Where the legislation indicates we need to get to:***

State Farm will meet the requirements set out in this Part by January 1, 2017 when constructing or redeveloping any public space to which Part IV.1 applies.

***What are we doing to get there?***

Any contract entered into after December 31, 2012 to construct or redevelop any public space will meet the requirements under Part IV.1.

***Gaps:***

There's the potential that contracts entered into after December 31, 2012 do not meet the requirements of this Part. We will review and take appropriate action.

## RECREATIONAL TRAILS AND BEACH ACCESS ROUTES, GENERAL

Sections 80.6 through 80.20 set out requirements for public: recreational trails; beach access routes; boardwalks; ramps; eating areas; outdoor play spaces. None of these sections apply to State Farm's facilities in Ontario. Should State Farm ever undertake to develop and maintain such features, we would review and apply the requirements as set out in Sections 80.6 to 80.20.

### EXTERIOR PATHS OF TRAVEL

#### 80.21 Exterior Paths of Travel, Application

This section states that this Part applies to newly constructed and redeveloped exterior paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose and not to provide a recreational experience.

(2) This Part does not apply to paths of travel regulated under Ontario Regulation 350/06 (Building Code)

#### ***Current State:***

This Part applies to public spaces that are newly constructed or redeveloped exterior paths of travel at State Farm facilities

#### ***Where the legislation indicates we need to get to:***

Public spaces that are newly constructed or redeveloped on and after January 1, 2017 shall meet the requirements of this act.

#### ***What are we doing to get there?***

Public spaces that are newly constructed or redeveloped shall meet the requirements of this act.

#### ***Gaps:***

None

#### 80.22: Exterior paths of travel, general obligation

This section states that obligated organizations are obliged to ensure that any exterior paths of travel that they construct or redevelop and intend to maintain meet the requirements set out in this Part

#### ***Current State:***

State Farm will incorporate accessibility retrofits into facilities when renovations are undertaken.

#### ***Where the legislation indicates we need to get to:***

Exterior paths of travel that are newly constructed or redeveloped on and after January 1, 2017 shall meet the requirements of this act.

### ***What are we doing to get there?***

Exterior paths of travel that are newly constructed or redeveloped will meet the requirements of this act as stipulated.

### ***Gaps:***

None

### **80.23: Exterior Patch of Travel Technical Requirements**

This section states that obligated organizations shall ensure that any exterior paths of travel that they construct or redevelop and intend to maintain will meet the requirements set out in this Part.

### ***Current State:***

The exterior paths of travel at owned State Farm facilities currently meet the requirements under this section.

### ***Where the legislation indicates we need to get to:***

1. The exterior path must have a minimum clear width of 1,500 mm, but this clear width can be reduced to 1,200 mm to serve as a turning space where the exterior path connects with a curb ramp.
2. Where the head room clearance is less than 2,100 mm over a portion of the exterior path, a rail or other barrier with a leading edge that is cane detectable must be provided around the object that is obstructing the head room clearance.
3. The surface must be firm and stable.
4. The surface must be slip resistant.
5. Where an exterior path has openings in its surface,
  - ii. the openings must not allow passage of an object that has a diameter of more than 20 mm, an
  - iii. any elongated openings must be oriented approximately perpendicular to the direction of travel.
6. The maximum running slope of the exterior path must be no more than 1:20, but where the exterior path is a sidewalk, it can have a slope greater than 1:20, but it cannot be steeper than the slope of the adjacent roadway.
7. The maximum cross slope of the exterior path must be no more than 1:20, where the surface is asphalt, concrete or some other hard surface, or no more than 1:10 in all other cases.
8. The exterior path must meet the following requirements:
  - i. It must have a 1:2 bevel at changes in level between 6 mm and 13 mm.
  - ii. It must have a maximum running slope of 1:8 or a curb ramp that meets the requirement of section 80.26 at changes in level of greater than 13 mm and less than 75 mm.

- iii. It must have a maximum running slope of 1:10 or a curb ramp that meets the requirement of section 80.26 at changes in level of 75 mm or greater and 200 mm or less.
  - iv. It must have a ramp that meets the requirements of section 80.24 at changes in level of greater than 200 mm.
9. The entrance to the exterior path of travel must provide a minimum clear opening of 850 mm, whether the entrance includes a gate, bollard or other entrance design.

***What are we doing to get there?***

Public spaces that are newly constructed or redeveloped shall meet the requirements of this act.

***Gaps:***

None

**80.24; Exterior Paths of travel, Ramps**

This section states that obligated organizations shall ensure that any ramps for exterior paths of travel that they construct or redevelop and intend to maintain shall meet the requirements set out in this Part

***Current State:***

The ramps at the Aurora Operations Centre do not currently meet all the requirements of this Part. State Farm does not have any ramps at its London Operations Centre.

***Where the legislation indicates we need to get to:***

1. The ramp must have a minimum clear width of 900 mm.
2. The surface of the ramp must be firm and stable.
3. The surface of the ramp must be slip resistant.
4. The ramp must have a maximum running slope of no more than 1:15.
5. The ramp must be provided with landings that meet the following requirements:
  - i. Landings must be provided,
    - A. at the top and bottom of the ramp,
    - B. where there is an abrupt change in direction of the ramp, and
    - C. at horizontal intervals not greater than nine meters apart.
  - ii. Landings must be a minimum of 1,670 mm by 1,670 mm at the top and bottom of the ramp and where there is an abrupt change in direction of the ramp.
  - iii. Landings must be a minimum of 1,670 mm in length and at least the same width of the ramp for an in-line ramp.
  - iv. Landings must have a cross slope that is not steeper than 1:50
6. Where a ramp has openings in its surface,

- i. the openings must not allow passage of an object that has a diameter of more than 20 mm, and
  - ii. any elongated openings must be oriented approximately perpendicular to the direction of travel.
7. A ramp must be equipped with handrails on both sides of the ramp and the handrails must,
  - i. be continuously graspable along their entire length and have circular cross-section with an outside diameter not less than 30 mm and not more than 40 mm, or any non-circular shape with a graspable portion that has a perimeter not less than 100 mm and not more than 155 mm and whose largest cross-sectional dimension is not more than 57 mm,
  - ii. be not less than 865 mm and not more than 965 mm high, measured vertically from the surface of the ramp, except that handrails not meeting these requirements are permitted provided they are installed in addition to the required handrail,
  - iii. terminate in a manner that will not obstruct pedestrian travel or create a hazard,
  - iv. extend horizontally not less than 300 mm beyond the top and bottom of the ramp,
  - v. be provided with a clearance of not less than 50 mm between the handrail and any wall to which it is attached, and
  - vi. be designed and constructed such that handrails and their supports will withstand the loading values obtained from the non-concurrent application of a concentrated load not less than 0.9 kN applied at any point and in any direction for all handrails and a uniform load not less than 0.7 kN/meter applied in any direction to the handrail.
8. Where the ramp is more than 2,200 mm in width,
  - i. one or more intermediate handrails which are continuous between landings shall be provided and located so that there is no more than 1,650 mm between handrails, and
  - ii. the handrails must meet the requirements set out in paragraph 7.
9. The ramp must have a wall or guard on both sides and where a guard is provided, it must,
  - i. be not less than 1,070 mm measured vertically to the top of the guard from the ramp surface, and
  - ii. be designed so that no member, attachment or opening located between 140 mm and 900 mm above the ramp surface being protected by the guard will facilitate climbing.
10. The ramp must have edge protection that is provided,
  - i. with a curb at least 50 mm high on any side of the ramp where no solid enclosure or solid guard is provided, or
  - ii. with railings or other barriers that extend to within 50 mm of the finished ramp surface.

(2) In this section,

“kN” means kilonewtons.

### ***What are we doing to get there?***

Ramps that are newly constructed or redeveloped shall meet the requirements of this act.

### ***Gaps:***

Landings are not provided at intervals of 9 meters apart or less on the North ramp at the Aurora Operations Centre. (5,i, c)

- Landings are not a minimum of 1,670 mm by 1,670 mm where there is an abrupt change in direction of the ramp on the South ramp at the Aurora Operations Centre. (5, 2)
- Both ramps at the Aurora Operations Centre are equipped with handrails on only one side. (7)
- Ramps at the Aurora Operations Centre do not extend horizontally not less than 300 mm beyond the top and bottom of the ramp (7 iv.)
- Both Ramps at the Aurora Operations Centre have a wall or guard only on one side. (9)
- Both Ramps at the Aurora Operations Centre do not have edge protection that is at least 50 mm high on any side of the ramp where no solid enclosure or solid guard is provided, or railings or other barriers that extend to within 50 mm of the finished ramp surface. (10, i, ii)

### **80.25: Stairs connected to exterior path of Travel**

This section states that obligated organizations shall ensure that any stairs connected to exterior paths of travel that they construct or redevelop and intend to maintain shall meet the requirements set out in this Part

#### ***Current State:***

The exterior stairs at the Aurora Operations Centre do not currently meet all the requirements of this Part. State Farm does not have any stairs at its London Operations Centre

#### ***Where the legislation indicates we need to get to:***

1. The surface of the treads must have a finish that is slip resistant.
2. Stairs must have uniform risers and runs in any one flight.
3. The rise between successive treads must be between 125 mm and 180 mm.
4. The run between successive steps must be between 280 mm and 355 mm.
5. Stairs must have closed risers.
6. The maximum nosing projection on a tread must be no more than 38 mm, with no abrupt undersides.
7. Stairs must have high tonal contrast markings that extend the full tread width of the leading edge of each step.
8. Stairs must be equipped with tactile walking surface indicators that are built in or applied to the walking surface, and the tactile walking surface indicators must,
  - i. have raised tactile profiles,
  - ii. have a high tonal contrast with the adjacent surface,
  - iii. be located at the top of all flights of stairs, and
  - iv. extend the full tread width to a minimum depth of 610 mm commencing one tread depth from the edge of the stair.

9. Handrails must be included on both sides of stairs and must satisfy the requirements set out in paragraph 7 of subsection 80.24 (1).
10. A guard must be provided that is not less than 920 mm, measured vertically to the top of the guard from a line drawn through the outside edges of the stair nosing and 1,070 mm around the landings and is required on each side of a stairway where the difference in elevation between ground level and the top of the stair is more than 600 mm but, where there is a wall, a guard is not required on that side.
11. Where stairs are more than 2,200 mm in width,
  - i. one or more intermediate handrails that are continuous between landings must be provided and located so there is no more than 1,650 mm between handrails, and
  - ii. the handrails must satisfy the requirements set out in paragraph 7 of subsection 80.24 (1).

### ***What are we doing to get there?***

Stairs that are newly constructed or redeveloped shall meet the requirements of this act.

### ***Gaps:***

- The run between successive steps is not between 280 mm and 355 mm. at the main entrance of the Aurora Operations Centre (4)
- The exterior stairs at the Aurora Operations Centre do not have high tonal contrast markings that extend the full tread width of the leading edge of each step. (7)
- The exterior stairs at the Aurora Operations Centre are not equipped with tactile walking surface indicators that are built in or applied to the walking surface. (8)
- The exterior stairs at the main entrance of the Aurora Operations Centre do not have one or more intermediate handrails that are continuous between landings so there is no more than 1,650 mm between handrails. (11)

### **80.26: Exterior Paths of Travel, Curb Ramps**

This section states that where a curb ramp is provided on an exterior path of travel, the curb ramp must align with the direction of travel and meet the requirements of this section.

### ***Current State:***

State Farm does not have any curb ramps at their owned facilities.

### ***Where the legislation indicates we need to get to:***

State Farm will meet the requirements set out in Part IV.1 by January 1, 2017 when constructing or redeveloping any public space to which this Part IV.1 applies.

### ***What are we doing to get there?***

State Farm Insurance will meet the requirements set out in this Part.

***Gaps:***

None

**80.27: Exterior Paths of Travel, Depressed Curb**

This section states that where a depressed curb is provided on an exterior path of travel, it must meet the requirements of this section.

***Current State:***

The depressed curbs at the Aurora Operations Centre do not currently meet all the requirements of this Part. State Farm Insurance does not have any depressed curbs at its London Operations Centre.

***Where the legislation indicates we need to get to:***

1. The depressed curb must have a maximum running slope of 1:20.
2. The depressed curb must be aligned with the direction of travel.
3. Where the depressed curb is provided at a pedestrian crossing, it must have tactile walking surface indicators that,
  - i. have raised tactile profiles,
  - ii. have high tonal contrast with the adjacent surface,
  - iii. are located at the bottom portion of the depressed curb that is flush with the roadway,
  - iv. are set back between 150 mm and 200 mm from the curb edge, and
  - v. are a minimum of 610 mm in depth.

***What are we doing to get there?***

Depressed curbs that are newly constructed or redeveloped shall meet the requirements of this act.

***Gaps:***

At the Aurora Operations Centre, where the depressed curb is provided at a pedestrian crossing, no tactile walking surface indicators have been provided in accordance with the requirements under this section. (3, i, ii, iii, iv, v)

**80.28: Pedestrian Signals**

This section states that where new pedestrian signals are being installed or existing pedestrian signals are being replaced at a pedestrian crossover, they must be accessible pedestrian signals.

***Current State:***

State Farm does not have any pedestrian signals at its owned facilities.

***Where the legislation indicates we need to get to:***

State Farm will meet the requirements set out in Part IV.1 by January 1, 2017 when constructing or redeveloping any public space to which this Part applies.

***What are we doing to get there?***

State Farm will meet the requirements set out in this Part.

***Gaps:***

None

**80.29: Exterior Paths of Travel, Rest Areas**

This section states that, when constructing new or redeveloping existing exterior paths of travel, obligated organizations shall consult with the public and persons with disabilities on the design and placement of rest areas.

***Current State:***

State Farm does not have any rest areas that it intends to maintain.

***Where the legislation indicates we need to get to:***

Consult on all items noted in Section 80.29 before construction of new rest areas.

***What are we doing to get there?***

State Farm shall consult on all items noted in Section 80.29 before construction of new rest areas.

***Gaps:***

None

**80.30: Exceptions, Limitations**

This section states that, where an exception is permitted to a requirement for an exterior path of travel, the exception applies solely,

- (a) to the particular requirement for which the exception is allowed and not to any other requirement that applies to the exterior path; and
- (b) to the portion of the exterior path for which it is claimed and not to the exterior path in its entirety.

***Current State:***

State Farm will incorporate accessibility retrofits into facilities when renovations are undertaken

***Where the legislation indicates we need to get to:***

State Farm is to meet the requirements set out in Part IV.1 by January 1, 2017 when constructing or redeveloping any public space to which this Part IV.1 applies.

***What are we doing to get there?***

State Farm will meet the requirements set out in this Part.

***Gaps:***

None

**80.31: Exceptions, General**

This section states that exceptions to the requirements that apply to exterior paths of travel are permitted where obligated organizations can demonstrate that one or more of the conditions outlined in this section are applicable.

***Current State:***

State Farm plans to incorporate accessibility retrofits into facilities when renovations are undertaken.

***Where the legislation indicates we need to get to:***

State Farm is to meet the requirements set out in Part IV.1 by January 1, 2017 when constructing or redeveloping any public space to which this Part IV.1 applies.

***What are we doing to get there?***

State Farm Insurance will meet the requirements set out in this Part.

***Gaps:***

State Farm may demonstrate that it is not practical or possible to comply with the requirements, or some of them, because existing physical or site constraints prohibit modification or addition of elements, spaces or features. (6)

## ACCESSIBLE PARKING

### **80.32: Application off street parking**

This section states that obligated organizations shall ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain, the off-street parking facilities meet the requirements set out in this Part.

#### ***Current State:***

State Farm plans to incorporate accessibility retrofits into facilities when renovations are undertaken.

#### ***Where the legislation indicates we need to get to:***

State Farm is to meet the requirements set out in Part IV.1 by January 1, 2017 when constructing or redeveloping any public space to which this Part applies.

#### ***What are we doing to get there?***

State Farm Insurance will meet the requirements set out in this Part.

#### ***Gaps:***

None

### **80.33: Exceptions**

This section states that exceptions to the requirements that apply to off street parking are permitted if one or more of the conditions outlined in this section are applicable.

#### ***Current State:***

These exceptions do not apply to any owned State Farm facilities.

#### ***Where the legislation indicates we need to get to:***

State Farm Insurance is to meet the requirements set out in Part IV.1 by January 1, 2017 when constructing or redeveloping any public space to which this Part applies.

#### ***What are we doing to get there?***

State Farm Insurance will meet the requirements set out in this Part.

#### ***Gaps:***

None

### **80.34: Types of accessible parking spaces**

This section states that off-street parking facilities must provide two types of parking spaces for the use of persons with disabilities.

***Current State:***

The types of parking spaces at owned State Farm facilities do not currently meet all the requirements of this Part.

***Where the legislation indicates we need to get to:***

Obligated organizations must provide parking spaces of the following types:

- Type A, a wider parking space which has a minimum width of 3,400 mm and signage that identifies the space as “van accessible”.
- Type B, a standard parking space which has a minimum width of 2,400 mm.

***What are we doing to get there?***

Newly constructed or redeveloped off street parking facilities shall meet the requirements of this Part.

***Gaps:***

Type A spaces do not have signage that identifies the space as “van accessible” in owned State Farm off-street parking facilities (1)

**80.35: Access Aisles**

This section states that access aisles must be provided for all parking spaces for the use of persons with disabilities in off-street parking facilities.

***Current State:***

Access aisles are not provided for all parking spaces for the use of persons with disabilities in off-street parking facilities.

***Where the legislation indicates we need to get to:***

Access aisles may be shared by two parking spaces for the use of persons with disabilities in an off-street parking facility and must meet the following requirements:

1. They must have a minimum width of 1,500 mm.
2. They must extend the full length of the parking space.
3. They must be marked with high tonal contrast a diagonal line, which discourages parking in them, where the surface is asphalt, concrete or some other hard surface.

***What are we doing to get there?***

Newly constructed or redeveloped off street parking facilities shall meet the requirements of this Part.

***Gaps:***

Access aisles are not currently provided for all parking spaces for the use of persons with disabilities in off-street parking facilities.

**80.36: Minimum number and type of accessible parking spaces**

This section states that Off-street parking facilities must have a minimum number of parking spaces for the use of persons with disabilities, in accordance with the requirements of this section.

***Current State:***

The number and types of parking spaces at owned State Farm facilities do not currently meet all the requirements of this Part.

***Where the legislation indicates we need to get to:***

One (1) parking space for the use of persons with disabilities, which meets the requirements of a Type A parking space, where there are twelve (12) parking spaces or fewer.

2. Four per cent of the total number of parking spaces for the use of persons with disabilities, where there are between 13 and 100 parking spaces in accordance with the following ratio, rounding up to the nearest whole number:
  - i. Where an even number of parking spaces for the use of persons with disabilities are provided in accordance with the requirements of this paragraph, an equal number of parking spaces that meet the requirements of a Type A parking space and a Type B parking space must be provided.
  - ii. Where an odd number of parking spaces for the use of persons with disabilities are provided in accordance with the requirements of this paragraph, the number of parking spaces must be divided equally between parking spaces that meet the requirements of a Type A parking space and a Type B parking space, but the additional parking space, the odd-numbered space, may be a Type B parking space.
3. One parking space for the use of persons with disabilities and an additional three per cent of parking spaces for the use of persons with disabilities, where there are between 101 and 200 parking spaces must be parking spaces for the use of persons with disabilities, calculated in accordance with ratios set out in subparagraphs 2 i and ii, rounding up to the nearest whole number.
4. Two parking spaces for the use of persons with disabilities and an additional two per cent of parking spaces for the use of persons with disabilities, where there are between 201 and 1,000 parking spaces must be parking spaces for the use of persons with disabilities in accordance with the ratio in subparagraphs 2 i and ii, rounding up to the nearest whole number.
5. Eleven parking spaces for the use of persons with disabilities and an additional one per cent of parking spaces for the use of persons with disabilities, where more than 1,000 parking spaces are provided must be parking spaces for the use of persons with disabilities in

accordance with the ratio in subparagraphs 2 i and ii, rounding up to the nearest whole number

- (2) If an obligated organization provides more than one off-street parking facility at a site, the obligated organization shall calculate the number and type of parking spaces for the use of persons with disabilities according to the number and type of parking spaces required for each off-street parking facility.
- (3) In determining the location of parking spaces for the use of persons with disabilities that must be provided where there is more than one off-street parking facility at a site, an obligated organization may distribute them among the off-street parking facilities in a manner that provides substantially equivalent or greater accessibility in terms of distance from an accessible entrance or user convenience.
- (4) For the purposes of subsection (3), the following factors may be considered in determining user convenience:
  1. Protection from the weather.
  2. Security.
  3. Lighting.
  4. Comparative maintenance.

### ***What are we doing to get there?***

Newly constructed or redeveloped off street parking facilities shall meet the requirements of this Part.

### ***Gaps:***

- 3 accessible parking spaces are required in the side lot of the London Operations Centre (2 type B; 1 type A). (2, ii). We currently have spaces.
- 11 accessible parking spaces are required in the rear lot of the Aurora Operations Centre (6 type B ; 5 Type A). We currently have spaces
- 24 accessible parking spaces are required in the front lot of the Aurora Operations Centre (12 Type B: 12 Type A). We currently have spaces.

### **80.37: Signage**

This section states that obligated organizations shall ensure that parking spaces for the use of persons with disabilities are distinctly indicated.

### ***Current State:***

Accessible parking at owned State Farm facilities meet the requirements set out in this Part.

### ***Where the legislation indicates we need to get to:***

Accessible permit parking signs in accordance with section 11 of Regulation 581 of the Revised Regulations of Ontario, 1990 must be erected for accessible parking spaces.

### ***What we are doing to get there:***

Newly constructed or redeveloped off street parking facilities shall meet the requirements of this Part

***Gaps:***

None

**80.38: Exception**

This section states that exceptions to the requirements that apply to accessible parking are permitted if one or more of the conditions outlined in this section are applicable.

***Current State:***

State Farm Insurance plans to incorporate accessibility retrofits into facilities when renovations are undertaken.

***Where the legislation indicates we need to get to:***

State Farm Insurance is to meet the requirements set out in Part IV.1 by January 1, 2017 when constructing or redeveloping any public space to which this Part applies.

***What are we doing to get there?***

State Farm Insurance will meet the requirements set out in this Part.

***Gaps:***

State Farm may demonstrate that it is not practical to comply with the requirement because existing physical or site constraints prevent it from meeting the required ratio. (1) Where an exception exists, State Farm shall provide as close to as many parking spaces of the types required for the use of persons with disabilities that meet the requirements of this Part.

**80.39: On-Street Parking Spaces**

This section states that when constructing on-street parking spaces, designated public sector organizations shall consult on the need, location and design of accessible on-street parking spaces.

***Current State:***

State Farm is not a public sector organization and therefore these obligations do not apply.

***Where the legislation indicates we need to get to:***

Not applicable.

***What are we doing to get there?***

Not applicable.

***Gaps:***

None

## OBTAINING SERVICES

### 80.40: Obtaining Service, Application

This section states that obligated organizations shall meet the requirements set out in this Part in respect to all newly constructed waiting areas, service counters and fixed queuing guides whether in buildings or out of doors.

#### ***Current State:***

The service counters at owned State Farm facilities do not currently meet all the requirements of this Part.

#### ***Where the legislation indicates we need to get to:***

1. There must be at a minimum one service counter that accommodates a mobility aid for each type of service provided and the accessible service counter must be clearly identified with signage, where there are multiple queuing lines and service counters.
2. Each service counter must accommodate a mobility aid, where a single queuing line serves a single or multiple counters...
  - (2) The service counter that accommodates mobility aids must meet the following requirements:
    1. The countertop height must be such that it is usable by a person seated in a mobility aid.
    2. There must be sufficient knee clearance for a person seated in a mobility aid, where a forward approach to the counter is required.
    3. The floor space in front of the counter must be sufficiently clear so as to accommodate a mobility aid.

#### ***What are we doing to get there?***

State Farm plans to incorporate accessibility retrofits into facilities when renovations are undertaken

#### ***Gaps:***

The Service Counter at the London Operations Centre is not at a height such that it is usable by a person seated in a mobility aid. (2 ss.1,)

The Service Counters at both the London and Aurora Operation Centers do not have sufficient knee clearance for a forward approach by a person seated in a mobility aid. (2 ss.2)

### 80.42: Fixed Queuing Guides

This section states that when constructing new fixed queuing guides must meet the requirements set out in this Part.

#### ***Current State:***

State Farm plans to incorporate accessibility retrofits into facilities when renovations are undertaken.

***Where the legislation indicates we need to get to:***

State Farm is to meet the requirements set out in Part IV.1 by January 1, 2017 when constructing or redeveloping any public space to which this Part applies.

***What are we doing to get there?***

State Farm will meet the requirements set out in this Part.

***Gaps:***

None

**80.43: Waiting Areas**

This section states that when constructing a new waiting area or redeveloping an existing waiting area, where the seating is fixed to the floor, a minimum of the greater of three (3) per cent or one (1) must be accessible.

***Current State:***

There is no seating fixed to the floor in waiting areas of owned State Farm facilities

***Where the legislation indicates we need to get to:***

State Farm is to meet the requirements set out in Part IV.1 by January 1, 2017 when constructing or redeveloping any public space to which this Part applies

***What are we doing to get there?***

State Farm will meet the requirements set out in this Part

***Gaps:***

None

## MAINTENANCE

### **80.44: Maintenance of Accessible Elements**

This section states that multi-year accessibility plans include the requirements set out in this Part.

#### ***Current State:***

State Farm's multiyear accessibility plans do not include procedures for preventative and emergency maintenance, or for dealing with temporary disruptions of the accessible elements required under this Part.

#### ***Where the legislation indicates we need to get to:***

Obligated organizations shall ensure that their multi-year accessibility plans include the following:

1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part.
2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order

#### ***What are we doing to get there?***

State Farm will incorporate the following procedures for dealing with temporary disruptions and preventative and emergency maintenance for of the accessible elements required under this Part.

1. When service disruptions are planned or anticipated (e.g., routine maintenance or upgrades), notices of the disruption will be posted in advance of the disruption by the department overseeing the project.
2. When service disruptions are not anticipated (e.g., sudden malfunctions), notices of service disruption will be posted as soon as possible after the disruption occurs by the department overseeing the project.
3. All notices regarding service disruptions will:
  - a. note the reasons for the disruption
  - b. note how long service is expected to be disrupted
  - c. be posted in conspicuous places where people with disabilities can easily access the information such as:
    - i. on the door to the State Farm premises
    - ii. on the State Farm website
    - iii. advise clients about alternative ways to access the service
4. In the event of any service disruptions, alternative means of providing the service will be offered wherever possible.

***Gaps:***

Notice of Disruption Template has not yet been developed.

The attached Excel Chart ("State Farm CA Multi-Year Integrated Accessibility Plan.xlsx") contains information only from the assessment of the Aurora Operations Centre and does not address AODA requirements for the London Operations Centre or for any Leased State Farm Facilities.

## Part V – Compliance

### Record-keeping of Organization’s Compliance with Training Requirements:

#### *Legislative requirements:*

By January 1, 2015, large organizations like State Farm are to be in compliance with this section.

#### *Checkpoints:*

- Have reviewed current tracking process for employee completion of AODA training. It is largely a manual undertaking that could likely be technically enhanced.
- It makes sense to compare AODA tracking with how the organization tracks other required courses such Workplace Violence or Code of Conduct.

#### *Gaps:*

Currently, we have a manual process whereby the Administrative Services department reaches out to all department leaders in Canada and affected areas in the USA (those that handle or interact with Ontario customers including internal customers and employees). We need to develop a more efficient and effective process.

#### **Compliance:**

#### *Application*

**81.** This Part applies in respect of this Regulation and Ontario Regulation 429/07 (Accessibility Standards for Customer Service) made under the Act. O. Reg. 191/11, s. 81.

#### *Definition*

**82.** In this Part,

“corporation” means any corporation with or without share capital wherever or however incorporated and includes a corporation with or without share capital that is incorporated or continued otherwise than by or under the authority of an Act of the Legislature. O. Reg. 191/11, s. 82.

#### *Amount of administrative penalty*

**83. (1)** For the purposes of paragraph 3 of subsection 21 (3), paragraph 2 of subsection 21 (4), subsection 21 (5) and paragraph 2 of subsection 33 (8) of the Act, a director shall determine the amount of the administrative penalty according to the following rules:

1. The director shall determine whether, in his or her opinion, the severity of the impact of the contravention is of a minor, moderate or major nature.
2. The director shall determine the contravention history of the person or organization over the current two reporting cycles period.
3. The director shall determine whether the person or organization is a corporation or an individual or unincorporated organization.

4. Based on the determinations made in accordance with paragraphs 1, 2 and 3, and subject to paragraph 5, the director shall determine the amount of administrative penalty using Schedule 2, in the case of an individual or unincorporated organization, or Schedule 3, in the case of a corporation.
  5. In cases where the impact of the contravention is determined to be major and the contravention history of the person or organization is determined to be major, the director may treat the penalty determined in accordance with Schedule 2 or 3 as a daily penalty to a maximum of,
    - i. \$100,000, in the case of a corporation, and
    - ii. \$50,000, in the case of an individual or unincorporated organization. O. Reg. 191/11, s. 83 (1).
- (2) For the purposes of paragraph 1 of subsection (1), the severity of the impact of the contravention shall be determined by ranking the contravention as minor, moderate or major in the following manner:
1. A contravention is minor where it involves the contravention of an administrative requirement.
  2. A contravention is moderate where it involves the contravention of a requirement for organizational preparedness.
  3. A contravention is major where it involves the contravention of a priority requirement that includes, but is not limited to, a contravention that may pose a health or safety risk to persons with disabilities. O. Reg. 191/11, s. 83 (2).
- (3) For the purposes of paragraph 2 of subsection (1), the contravention history of the person or organization shall be determined by ranking it as minor, moderate or major in the following manner:
1. A contravention history is minor where there has been no more than one previous contravention within the current two reporting cycles period.
  2. A contravention history is moderate where there has been between two and five previous contraventions within the current two reporting cycles period.
  3. A contravention history is major where there has been six or more previous contraventions within the current two reporting cycles period. O. Reg. 191/11, s. 83 (3).
- (4) For purposes of this section and subject to subsection (7), the current two reporting cycles period is determined as follows:
1. A reporting cycle corresponds to the cycle within which a person or organization must file an accessibility report under subsection 14 (1) of the Act and begins on the first day the person or organization must file the report and ends on the last day before the next report must be filed.
  2. Subject to paragraph 3, the current two reporting cycles period refers to the period that begins on the first day of a reporting cycle (“the first reporting cycle”) and ends on the last day of the next reporting cycle (“the second reporting cycle”).
  3. The first reporting cycle in a current two reporting cycles period commences as an odd reporting cycle, as in the first reporting cycle, the third reporting cycle and the fifth reporting cycle, and the second reporting cycle in a current two reporting cycles period commences as an even reporting cycle. O. Reg. 191/11, s. 83 (4).

- (5) For purposes of determining contravention history in the current two reporting cycles period, on the first day of the first reporting cycle the contravention history of the person or organization is deemed to be zero and on the first day of every odd reporting cycle after that the contravention history of the person or organization is deemed to be zero. O. Reg. 191/11, s. 83 (5).
- (6) If a person or organization filed an accessibility report before July 1, 2011, the two reporting cycles period is calculated from the first day that the person or organization was required to file an accessibility report. O. Reg. 191/11, s. 83 (6).
- (7) For persons or organizations that are exempted from the reporting requirements of subsection 14 (1) of the Act, the two reporting cycles period consists of the 12-month period that begins at the earliest of the following and ends at the end of each 12-month period:
  1. The first day that a director requests reports or information from the person or organization under section 17 of the Act.
  2. The first day that an inspector requires a person or organization to produce a document, record or thing under subsection 19 (5) of the Act.
  3. The first day that the person or organization receives or is deemed to have received a notice of order under subsection 22 (1) of the Act. O. Reg. 191/11, s. 83 (7).
- (8) For persons or organizations to which subsection (7) applies, their contravention history is deemed to be zero at the end of each 12-month period. O. Reg. 191/11, s. 83 (8).

#### ***Review of order***

84. For purposes of the review of an order under section 25 of the Act, the following apply:

1. If a person or organization seeks a review, the person or organization must provide a written submission requesting the review, including an explanation as to why the review is sought, within 30 days after the order was made.
2. The director who reviews the order must be a director other than the director who made the order.
3. If the director reviewing the order decides to vary it, the director may reduce the amount of the administrative penalty but shall not increase the amount of the penalty.
4. If the director reviewing the order finds that the amount of the administrative penalty is excessive or punitive in the circumstances, the director shall reduce the amount of the penalty. O. Reg. 191/11, s. 84.

#### ***Payment of penalty***

85. (1) The person or organization that has been ordered to pay an administrative penalty shall pay the penalty within 30 days after the order was made, unless a longer period is specified in the order. O. Reg. 191/11, s. 85 (1).

(2) Where a person or organization that has been ordered to pay an administrative penalty seeks a review of the order under section 25 of the Act or appeals the order under section 27 of the Act, the person or organization shall pay the penalty within 30 days after the order is dealt with in the review or appeal, unless a different period is specified in the order after the review or appeal. O. Reg. 191/11, s. 85 (2).

(3) For the purposes of subsection (2), where a person or organization both seeks a review of the order and appeals the order, the administrative penalty shall be paid within 30 days after the order of the Tribunal, unless the order of the Tribunal specifies a different period. O. Reg. 191/11, s. 85 (3).

### ***Designation of tribunal***

[86.](#) The Licence Appeal Tribunal is designated as the tribunal for the purposes of section 26 of the Act. O. Reg. 191/11, s. 86.

### ***Accessibility reports***

[86.1 \(1\)](#) Subject to subsections 33 (3) and (5) of the Act, organizations shall file the accessibility report required under subsection 14 (1) of the Act with a director according to the following schedule:

1. Annually, in the case of the Government of Ontario and the Legislative Assembly.
2. Every two years, in the case of designated public sector organizations.
3. Every three years, in the case of large organizations. O. Reg. 413/12, s. 7.

(2) The reporting schedule referred to in subsection (1) begins to apply as of January 1, 2013, with the first report being due,

- a. as of December 31, 2013, in the case of the Government of Ontario and the Legislative Assembly;
- b. as of December 31, 2013, in the case of designated public sector organizations; and
- c. as of December 31, 2014, in the case of large organizations. O. Reg. 413/12, s. 7.

[87.](#) Omitted (provides for coming into force of provisions of this Regulation). O. Reg. 191/11, s.