

City of Ottawa Submission to the 2016 Review of the Accessibility Transportation Standards

July 2017

This feedback is submitted by the employees of the City of Ottawa in their professional capacity.

It should not be construed as the official position of Ottawa City Council.

Introduction

The City of Ottawa is proud to be a longtime champion of accessibility and the inclusion it affords to those who live, work, play, and visit our city.

Accessible transportation is essential to quality of life: it enables residents and visitors to travel with ease to where they need to go. With the deadline of an accessible Ontario by 2025 fast approaching, the City supports changes to this and other accessibility standards that provide greater support to people with disabilities in Ontario.

The City of Ottawa's conventional, specialized (Para Transpo) and light rail (O-train) services are federally and independently regulated public transit services and therefore the AODA, a provincial statute does not apply. They do nonetheless follow the spirit and intent of the legislation.

In this submission, staff provide feedback on the following topics:

- Sizes of mobility devices (Item 1)
- Identification of support persons (Item 3)
- Service animals (Item 7)
- On-demand accessible taxicabs (Item 19)
- Training for taxicab drivers (Item 21)
- Addressing attitudinal barriers (Item 23)

It is our belief that accessibility benefits everyone, and working together, we can help make Ontario more accessible.

Feedback

On balance, we do not object to the findings of the Review; rather, we offer feedback on areas that may require elaboration.

Item 1: Sizes of mobility devices

To ensure that more persons with disabilities can use public transportation and the physical spaces within the built environment, it would be helpful to facilitate broader awareness of mobility devices. This information may include not only the dimensions of devices, but also turning radius, given some physical limitations on public transportation and in the built environment. In particular, it may be helpful to provide this information to vendors of assistive mobility devices.

Item 3: Identification of support persons

We concur with the Committee's observation that, "there is currently no consistency in the manner in which persons with disabilities are required to demonstrate their need for a support person across different transit systems".

Should the Province choose to create a universal identification card indicating that the person with a disability requires a support person, perhaps there are links to be made with the Provincial Accessible Parking Permit card and to the Ontario Disability Support Program. These existing Provincial processes, already require medical proof of disability and mobility. This would avoid the requirement for people with disabilities needing to complete an additional process.

While the Committee does not expressly indicate that persons without such a card would not be permitted access to services, such a system should be put in place with the understanding that persons with disabilities that do not have cards – such as those with episodic disabilities or persons from outside Ontario – will be able to provide other proof of their need for a support person, upon request (such as documentation from a medical health professional, or being given the benefit of the doubt, as may be established by the service provider).

Item 7: Service animals

While City of Ottawa staff receive training on accessible customer service, including that people with numerous disabilities may use service animals, some members of the public may not be aware of this, and may, for example, assume that only persons with evident visual impairments may use service animals. To this end, we recommend that broader public service materials be developed, and released, by the Province on the diversity of disabilities that are assisted by service animals.

Item 19: On-demand accessible taxicabs

The City is pleased to have put in place a system whereby persons with disabilities may access an accessible taxicab, at a cost that is no more than the regular cost charged to other persons. In fact, in 2016, Council enacted a new Vehicle-for-Hire By-law which new provisions resulted in the issuance of four (4) additional non-transferrable accessible taxi plate holder licenses, increasing the total number to 191. As well, any new plate holder licenses issued in future will be accessible, and will not be transferrable.

However, we note that the review was silent on regulation for ride sharing services – or private transportation companies (PTCs). In particular, it would be helpful to have provincial regulations in place to ensure equitable access to persons with disabilities to those services provided by geo-location (GPS), third-party technologies.

As a means to establish a regulatory framework for PTCs in Ottawa, the City made the following requests to the Province:

- Provide authority to the City of Ottawa to impose and implement an accessibility levy to be applied to those PTCs that do not offer accessible vehicle-for-hire services
- Amend the AODA to include a reference to PTCs to establish a linkage to the accessibility levy referenced above.

While the City is negotiating a voluntary per-trip surcharge ('levy') to be paid to the City by licensed PTCs in order to expand accessible service options, municipalities have limited legislative tools to consistently ensure equity and access to these services.

It would also be useful to establish minimum accessibility requirements for PTCs, including, but not limited to, accessible customer service and information and communication supports.

Item 21: Training for taxicab drivers

Drivers of licensed taxicabs in Ottawa are required to be trained in an Accessible Taxicab Training Course, which has traditionally been provided by a post-secondary educational institution (in Ottawa's case, Algonquin College to date) using a curriculum approved by the City. We recommend that any additional training requirements be phased in over time, so that those drivers who have been trained to date, but who may require supplementary training, may receive it in a timely manner. It is our view that any regulatory requirement should be focused on the content of training, and that training should only be required once, as soon as practicable.

While we note that the Committee is aware of the "uncertainty with respect to the manner in which the sharing economy – ride-sourcing specifically – will be held to the standards", we submit that some training, specifically with regards to accessible customer service, should be required of all transit service providers, including those PTCs within the sharing economy. The responsibility for ensuring that taxicab and PTC

drivers are trained should remain with the taxi and PTC companies; they should be compelled to provide municipalities with proof and dates of training for drivers, upon request.

Item 23: Addressing attitudinal barriers

While addressing attitudinal barriers may not be part of the Transportation Standard, the need for such a mechanism is evident in transportation services and in all other municipal services.

Thus, we support additional materials that address non-visible disabilities, such as mental health, communication disabilities, and developmental disabilities. At times, some individuals without disabilities may not be aware of how to interact with people with these disabilities, and disabilities more generally.

Conclusion

As outlined in this submission, we encourage the Province to continue efforts to clarify existing rules and regulations, and to promote inclusive attitudes.

Finally, we hope the Committee and the Province will further investigate how to provide barrier-free, accessible transportation options for PTCs that use ride-sharing technologies. While the means to access transportation are changing, regulations should be put in place that ensure equity and access for all Ontarians.

Thank you for the opportunity to provide our comments.

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