

Table of Contents

1. Introduction	2
2. Executive Summary	3
3. Select Customer Service Barriers and Readily-Achievable Solutions.....	5
a) Commitment to Barrier-Free Customer Service.....	5
b) Designated Accessibility Customer Service Representative	5
c) Ensuring Accessibility for Ontarians with Speech and Language Disabilities	5
d) Letting Customers With Disabilities Know About Nearest Accessible Washroom And Transit Locations	6
e) Providing Accessible Public Washroom Signs.....	6
f) Posting Signage Requesting Compliance with Scent-Free Policy	6
g) Accessible Parking	7
h) Physical Barriers to Accessible Customer Service.....	7
i) Ensuring Accessibility of “Point-of-Sale” and Immovable Debit/Credit Information Transaction Machines (ITMs).....	9
j) Ensuring Accessibility of Cash Registers or Tills with Price Display	10
k) Accessible Drug Prescription Labels and Information.....	10
l) Accessibility of Restaurant Menus.....	11
m) Visual Fire Alarms	11
n) Accessibility of Services and of Provincially-Regulated Financial Institutions that Offer Bank-Like Services.....	11
o) Standard Symbol and Signage Use.....	11
p) Reducing Loud Music in Public Spaces Where Customer Service is Offered.....	11
q) Reinforcing Policies with Public Announcements	12
r) Meaningful Enforcement Mechanisms	12
Appendix A	13

Accessibility for Ontarians with Disabilities Act Alliance
United for a Barrier-Free Ontario for All People with Disabilities
www.aodaalliance.org aodafeedback@gmail.com Twitter: @aodaalliance

ARCH Disability Law Centre
www.archdisabilitylaw.ca

Brief to the Ontario Government on Necessary Revisions to the 2007 Customer Service Accessibility Standard

March 15, 2016

1. Introduction

In this brief, the Accessibility for Ontarians with Disabilities Act (AODA) Alliance and ARCH Disability Law Centre (ARCH) jointly present concrete, workable, and much-needed revisions to strengthen the Customer Service Accessibility Standard. The Ontario Government can easily implement these without excessive cost or delay.

The AODA Alliance is a voluntary non-partisan coalition of individuals and organizations. Our mission is: "To contribute to the achievement of a barrier-free Ontario for all persons with disabilities, by promoting and supporting the timely, effective, and comprehensive implementation of the Accessibility for Ontarians with Disabilities Act." To learn about us, visit: <http://www.aodaalliance.org>.

Our coalition is the successor to the Ontarians with Disabilities Act Committee. The ODA Committee advocated for over ten years for the enactment of strong, effective disability accessibility legislation. Our coalition builds on the ODA Committee's work. We draw our membership from the ODA Committee's broad, grassroots base. To learn about the ODA Committee's history, visit: <http://www.odacommittee.net>

ARCH Disability Law Centre is a specialty legal clinic dedicated to defending and advancing the equality rights of persons with disabilities in Ontario. We are a not-for-profit charitable organization whose staff reports to a volunteer elected Board of Directors, at least half of whom are people with disabilities. Our goal is to advance and defend the rights of persons with disabilities. To learn more, visit: <http://www.archdisabilitylaw.ca>.

On December 3, 2015, after getting input from its supporters, the AODA Alliance sent the Wynne Government a detailed submission on the Government's proposed revisions to the Customer Service Accessibility Standard and Integrated Accessibility Standards Regulation. Our submission showed that the Government's proposed revisions would not significantly improve the accessibility of Customer Service for people with disabilities in Ontario. In some ways, they would make the weak 2007 Customer Service Accessibility Standard even weaker. They would break Premier Kathleen Wynne's December 3, 2012 written promise to never reduce any accessibility protections under the AODA. They would also wrongly preserve an unlawful

provision in the Customer Service Accessibility Standard which impermissibly creates an accessibility barrier. To see the AODA Alliance's December 3, 2015 submission to the Wynne Government on its proposed revisions to the 2007 Customer Service Accessibility Standard, visit <http://www.aodaalliance.org/strong-effective-aoda/12042015.asp>

ARCH Disability Law Centre fully endorsed the AODA Alliance submissions and presented some additional comments to the Government.

As the final report of the Mayo Moran AODA Independent Review showed in 2015, Ontario lags behind schedule for reaching full accessibility by 2025. The Accessibility for Ontarians with Disabilities Act has not made a significant difference in the lives of people with disabilities, even ten years after the AODA was passed. The revisions that we propose would go a long way to changing the Customer Service Standard in a positive way.

Supplementing our earlier submissions, this new brief makes recommendations for specific revisions that the Wynne Government should enact to strengthen the Customer Service Accessibility Standard. Our recommendations are readily achievable in a short time, with little or no cost to obligated organizations. Any minimal cost is more than offset by an obligated organization's increased profitability and productivity. Where we can, we indicate where comparable measures have been spelled out either in laws in other jurisdictions, or in "best practices" identified by government bodies or professional/business associations. These revisions, when implemented, will improve organizational or business success and help generate profits for obligated organizations. They reflect and help implement the existing requirements of the duty to accommodate customers with disabilities imposed by the Ontario Human Rights Code.

We urge the Ontario Government to assign senior Government officials to sit down at one table together with representatives from the disability community, the business sector, and the broader public sector, to discuss our recommendations and prepare an agenda for improving the 2007 Customer Service Accessibility Standard. We offer the proposals in this brief as examples of needed revisions to discuss. Through this dialogue, other barriers and solutions to them will no doubt emerge.

2. Executive Summary

This brief lists some examples of low or no cost readily-achievable requirements that will improve the Customer Service Standard and make it more effective for persons with disabilities. The Customer Service Accessibility Standard should be revised to include these measures now, as well as by implementing additional measures that require long term action. Examples of revisions here include:

- a) Ensuring that obligated organizations make a clear commitment to provide barrier-free and accessible customer service.
- b) Designating an employee within an organization's existing staff to ensure accessible that customer service is provided, and that complaints about accessibility are heard and readily

resolved.

- c) Communicating by diverse and adaptable methods.
- d) Advising customers with disabilities of the nearest available accessible washroom and transit locations.
- e) Providing accessible public washroom signs.
- f) Posting signage about scent-free policies.
- g) Establishing accessible parking.
- i) Requiring accessible “point-of-sale” and movable debit/credit information transaction machines (ITMs).
- j) Ensuring accessibility of cash registers or tills with price displays.
- k) Providing accessible drug prescription labels and information.
- l) Providing accessible restaurant menus.
- m) Implementing visual fire alarms.
- n) Making accessible any financial services and provincially-regulated financial institutions that offer bank-like services.
- o) Standardizing all signage for ease and consistency.
- p) Reducing intrusive loud music in public spaces where customer service is offered.
- q) Making public announcements that reinforce priority accessibility policies at an obligated organization’s establishment.
- r) Enforcing all priority policies that have been established for persons with disabilities. This includes designated seating, priority entry to public transportation and other policies designed to remove barriers. Without enforcing priority policies for persons with disabilities, these measures become meaningless.

This list is not exhaustive. We urge that revisions to the Customer Service Accessibility Standard ensure that needed accessibility and accommodations are provided to customers with all kinds of disabilities, including e.g. those labelled with intellectual, learning, mental health, communication, or mobility disabilities, or vision or hearing loss.

Appendix A provides a history of the Customer Service Standard and the Government’s review of it.

3. Select Customer Service Barriers and Readily-Achievable Solutions

a) Commitment to Barrier-Free Customer Service

The Customer Service Accessibility Standard requires obligated organizations to commit to providing accessible, barrier-free Customer Service to customers with disabilities. This policy should be publicly posted, e.g. on the obligated organization's website and in the obligated organization's establishment.

b) Designated Accessibility Customer Service Representative

All organizations that provide goods, services or facilities to customers with disabilities should designate an existing employee to assist customers with disabilities, ensure compliance with customer service standards, and resolve customer service complaints. This "one-stop-shopping" approach helps organizations ensure accessible Customer Service while helping customers with disabilities know whom to approach.

This practice is mandated under the *Americans with Disabilities Act* (s. 35.107). Moreover, each Ontario-administered court facility commendably has a designated Courts Accessibility and Accommodation Coordinator appointed from among its court services staff.

If an obligated organization has a website, it should be required to clearly identify that there is an accessible Customer Service representative in their organization, and how to contact them. Contact information should include a variety of communication methods including both phone and email, in order to accommodate different communication disabilities.

If the obligated organization has other readily-available ways of announcing this to the public, such as on a telephone interactive voice response system, it should be required to announce that position on that line. Finally, any recorded messages including phone numbers should be repeated more than once, slowly, in plain language.

c) Ensuring Accessibility for Ontarians with Speech and Language Disabilities

When serving a customer with a communication disability, accessible service should be seek to ensure that the customer is effectively understood. To achieve this, the obligated organization should be required to ensure that a customer service representative is specifically trained (beyond the standard accessible Customer Service training, given to all employees) in addressing a list of recurring communication supports. The Ontario Government could assist this by creating a free online training module to fulfil this need.

Communication Disabilities Access Canada (CDAC) defines this essential communication as a two-way process of understanding and expression of messages within contexts (page 2, <http://www.communication-access.org/wp-content/uploads/2015/11/CDAC-Brief-on-Amendments-to-AODA-.pdf>).

d) Letting Customers with Disabilities Know about Nearest Accessible Washroom and Transit Locations

Where obligated organizations have not yet ensured the full physical accessibility of their public premises, customers with disabilities still need vital information. When persons with disabilities cannot use the washroom in, or park near, an obligated organization that provides goods, services or facilities, due to physical accessibility barriers, those obligated organizations can lose customers.

As an interim measure, a customer service accessibility representative could easily tell a customer with a disability the location of the closest accessible washroom, parking or public transit stop. Ensuring that an obligated organization can provide this would cost nothing, improve awareness of existing barriers, and would be quite helpful to customers with disabilities.

Further, the customer service accessibility representative can relay information about the accessibility measures in the office, store, or restaurant. For example, when making reservations at a restaurant, the representative should know of barriers that still exist within the space, remove any known readily-removable barriers, and ask the customer what further measures are needed?

e) Providing Accessible Public Washroom Signs

When obligated organizations have public washrooms, they should be required to post accessible signage i.e. signs that include universal access symbols, Braille, large print and colour-contrasted raised letters. Further, if the washroom is not accessible, an accessible sign should direct users to the nearest accessible washrooms. These are not expensive. They are important for independent access.

The US Department of Justice requires signage to be acquired under the Americans for Disabilities Act (ADA) even in temporary situations such as emergency shelters. The signs should be installed “with raised characters and Braille on the wall adjacent to the latch side of the door and centered 60 inches above the floor and leave the existing sign in place on the door if removing it will damage the door,” (ADA Checklist for Emergency Shelters, 2007, pg. 42).

f) Posting Signage Requesting Compliance with Scent-Free Policy

Individuals with invisible disabilities such as Multiple Chemical Sensitivities (MCS), or Idiopathic Environmental Intolerance (IEI), can easily be accommodated through the expanded visibility of no scent/fragrance policies. In addition, offices using cleaners should be required to use the least toxic or “green” cleaning products. All of us benefit from fewer toxins in the air. This signage, web postings, and related periodic announcements on the obligated organization’s public address system and telephone voice response system, where these communication systems already exist, will also serve as a low-cost or no-cost public education tool.

Posting signs in stores, offices, and customer service centers will promote understanding of, and

responsiveness to, no scent policies. This policy should extend to scent policies in public spaces including on public transit.

Massey Hall and Roy Thompson Hall have signage posted and messages on their phone services while customers wait to purchase tickets, announcing their scent free policies. See also the University of Toronto's Scent-Free Guidelines and Information Poster, as an excellent example. (<https://www.utm.utoronto.ca/health-safety/information-campaigns/u-t-scent-free-guideline>)

g) Accessible Parking

Parking can be the first interaction between customers and an obligated organization. While longer term accessibility measures are incorporated or implemented in the built environment, interim or temporary measures may be necessary and very helpful. If a parking lot does not contain any, or enough accessible parking, and when there is an available curb cut-out in place, a temporary measure can be put in place to secure more accessible parking.

The Americans with Disabilities Act Checklist for Polling Places, a document produced for comparable temporary accessibility needs by the US Department of Justice, describes the process for adding additional accessible parking spaces:

“Find a relatively level parking area near the accessible entrance and then designate the area for accessible parking spaces and adjacent access aisles. Use three parking spaces to make two accessible parking spaces with an access aisle. Traffic cones or other temporary elements may be used to mark the spaces and access aisles. Provide a sign designating each accessible parking space and make sure the access aisle of each space is connected to the accessible route to the accessible entrance.” (2004, pg. 8).

This parking measure should be accompanied by a curb ramp in order to achieve true accessibility as set out in the Oregon State University Built Environment Best Practices (Part 2: 5C3a, <http://oregonstate.edu/accessibility/bestpractices>).

Alternatively, when there is no nearby accessible curb cut-out and the obligated organization does not have a curb ramp, the organization's accessible customer service representative should at minimum investigate and tell customers with disabilities about the nearest accessible parking spots available that they could use.

A recent example demonstrates this point. Various tribunals were using a local courthouse for their hearings. The police parked in all of the “handicapped” parking spots close to the court house, leaving persons with disabilities to park at the back end of the parking lot. This caused serious difficulties for persons with disabilities, especially in bad weather. They were late for their hearings. Sometimes people could not get to their hearings at all. This was only resolved when ARCH intervened and raised the possibility of a human rights application.

h) Physical Barriers to Accessible Customer Service

Despite promising to do so “promptly” in the 2011 Ontario election, the Ontario Government has

not enacted a comprehensive Built Environment Accessibility Standard under the AODA. The 2013 amendments to the Ontario Building code did not require accessibility retrofits for existing buildings that are not undergoing a significant renovation, or in parts of those buildings where no significant renovation is underway. Moreover, those Ontario Building code amendments did not ensure that new buildings, or significant renovations, were fully accessible and free of physical barriers. The “Public Spaces” accessibility requirements in the Integrated Accessibility Standards Regulation, enacted under the AODA in 2012, only provide for limited accessibility, free from physical barriers, in a very limited range of public spaces.

The 2014 final report of the Mayo Moran AODA Independent Review concluded that there is a pressing need for action on built environment barriers, especially retrofits to existing buildings.

Built environment barriers must therefore now be addressed, where appropriate, in other AODA accessibility standards, to fill huge gaps that remain. Physical accessibility is an indispensable part of accessible Customer Service. If customers with disabilities cannot get into the facility where goods and services are provided to the public, they are already placed in a very disadvantageous position due to their disability.

As such, it is appropriate to address physical barriers to accessible Customer Service through revisions to the Customer Service Accessibility Standard. Nothing prevents the Government from addressing physical accessibility barriers through the Customer Service Accessibility Standard, where they impede access to Customer Service.

As a first step, interim measures are immediately needed to address readily-removable physical barriers that impede accessible Customer Service. We offer examples here:

(i) Many establishments that offer goods, services or facilities to the public have one, two or three steps at their entrance. They should be required to at least provide a movable ramp, except where to do so would cause undue hardship within the meaning of the Ontario Human Rights Code.

The provision of transportable ramps is a necessary accommodation for persons with mobility disabilities. A growing number of obligated organizations have accepted this. Ontario’s ground-breaking “Stop Gap” organization offers such temporary ramps at low cost.

These ramps need to be positioned in a way that ensures there are no barriers at the top and bottom of the ramp. The ramp should fit the specific width of the sidewalk, or landing beyond the steps, and allow for maneuverability of a mobility device.

Door handles should function without the need for tight grasping, pinching, or twisting. See the US Department of Justice’s Checklist on Polling Places (pg. 20).

Where manageable, doors should have automatic door openers, especially if they are used for public access and are heavy. Members of the public with no disability much prefer to use automated doors, especially if they are carrying things.

If the building has not yet been retrofitted, businesses and service providers can post a phone number in the window at virtually no-cost so that customers with disabilities that prevent them from opening the door can contact someone inside.

(ii) Snow is an inevitable reality in Ontario winters. Yet, piling snow up on accessibility ramps and paths of travel need not be. The Customer Service Accessibility Standard should require that piling snow in those areas should be avoided, except where it is impossible to do so.

(iii) Obligated organizations should be required to remove movable physical obstacles from main paths of travel within an obligated organizations Customer Service areas, and on any outdoor public path of travel leading to the entrance. For example, where signage can be situated in a place where customers with vision loss or other disabilities won't collide with it, this should be preferred over placing it in the middle of main traffic halls or aisles. Head-level obstructions should be required to be avoided, especially where the obstacle cannot be safely detected by the use of a white cane.

(iv) The Customer Service Accessibility Standard should be revised to designate required widths of aisles and heights of shelves for display of products for sale. These can be varied depending on whether the obligated organization is a large chain store, or a medium-size establishment, or a small "mom and pop" local store. Retail establishments want to know what they need to do to ensure accessibility. They don't want to each have to spend the time and money to reinvent the wheel in this regard.

An obligated organization which, despite these efforts, cannot assure full physical accessibility of its public areas should be required by the Customer Service Accessibility Standard to create and publicize alternative ways for people with disabilities to access their goods, services, or facilities. This could include a phone number to call for curbside shopping, offers for a store employee to help a person shop from home using Skype etc.

i) Ensuring Accessibility of "Point-of-Sale" and Immovable Debit/Credit Information Transaction Machines (ITMs)

Increasingly, retail outlets and other businesses that use point-of-sale transaction machines (or ITMs), have shifted from debit/credit mechanisms that were attached to tills with thick, but malleable and movable cords, to fixed position ITMs that cannot be adjusted for wheelchair users.

Several US jurisdictions, including those under the Architectural Access Board (AAB) of Massachusetts, stipulate explicit accessible range of motion measurements that must met in all retail locations. Introducing a new point-of-sale device immovable device would not be acceptable in these jurisdictions, where the cord-connected devices would be acceptable.

The Customer Service Accessibility Standard should be required to ensure that these devices are positioned so that they are either reachable, or readily adjustable to be reachable. We propose that these new fixed position ITMs be made adjustable by a lowering mechanism, or a return to the cord devices. Since these technologies are rapidly changing, an obligated organization should

find it easy to adjust these installations over a short business cycle.

Point-of-sale devices that have a numeric keypad for keying in a PIN code should have a raised dot on the 5 and the “ok” buttons, to assist those with vision loss or dyslexia. If the device does not come with it, the obligated organization can fix this easily, e.g. with a drop of nail polish. Where available, they should chirp when each key is clicked, to assist those customers to know that the click registered.

As well, despite the inclusion of Information and Communications Standards in the AODA Integrated Accessibility Standards, point-of-sale devices are increasing using inaccessible touch-screen technology. To introduce new inaccessible point-of-sale devices is a clear violation of the duty not to create new barriers, imposed by the Ontario Human Rights Code. Apple iOS products all include measures to make touch-screen technology accessible. There is no reason why new point-of-sale devices, deployed in Ontario, do not also always include accessibility technologies.

The information and communication provisions of the Integrated Accessibility Standards Regulation have not prevented this problem. People with disabilities cannot wait for years until the Ontario Government completes a revision of those provisions, to solve this problem. The longer the Ontario Government delays addressing it, the more preventable new barriers will be created in the meantime.

j) Ensuring Accessibility of Cash Registers or Tills with Price Display

The price display on cash registers should use a large font, with proper colour contrasting. To assist customers with low vision.

In addition to tills with large font displays, customers with certain disabilities need the name of products and their price to be in larger font. One person reported that he has to carry a magnifying glass with him and bend close to produce in grocery stores because he is unable to read the signage. Many experience gradual vision loss as they age. For example, drug stores cater to many among the senior population.

k) Accessible Drug Prescription Labels and Information

Large drug store chains or other large chains that have pharmacies should be required to offer accessible prescription labelling services. This technology is now readily available. It would let customers with print disabilities independently read their prescription information.

Similarly, those establishments should be required to offer to print prescription labels and information in large font if requested. An American drug store chain was offering this service over a decade ago.

Finally, large retail establishments should have carry to car service for customers with disabilities who may be unable to carry groceries by themselves. This is included in Manitoba's *Discussion Paper on an Initial Proposed Customer Standard*, April 17, 2014.

l) Accessibility of Restaurant Menus

There are several low cost options for restaurants to make menus available in an accessible format for those who cannot read print due to such things as vision loss, or dyslexia. Braille menus can be ordered for production for a few dollars. A large print menu can be easily printed for pennies. Posting the menu online in an accessible format allows a person using a smart phone to have its screen-reader read the menu aloud to him or her.

m) Visual Fire Alarms

Having visual fire alarms installed in organizations that offer goods, services or to the public is essential for personal safety for persons who are Deaf, deafened or hard of hearing. Yet despite the irremediable consequences of not having a visual alarm, they are not required in existing or older organizations. See:

<https://www.orhma.com/Portals/0/PDF%20Files/GovtRelations/AccessibilityHotVisualFireAlarms2007.pdf>

n) Accessibility of Services and of Provincially-Regulated Financial Institutions that Offer Bank-Like Services

Organizations that provide financial services should have specific requirements to provide printed financial statements in an accessible format. Such financial records are very important to an individual and contain very private information. A person should not have to ask others to read that private information to them aloud.

Provincially-regulated banking institutions that provide services to their customers should implement technology that can allow customers with disabilities to conduct banking transactions at home via webcam. This service has been adopted in the UK by Lloyds Bank of London with success. Provincially-regulated financial institutions that offer bank-like services should be mandated to do the same.

Existing time lines for ensuring website accessibility should be accelerated for this class of organizations.

o) Standard Symbol and Signage Use

Where possible, signage should use consistent styles and symbols. Universal symbols and signage help ease-of-use for the public including people with disabilities. Washrooms, entrances and exits, automatic door openers, and ATM and ITM points-of-service should use identical symbols and colours to allow for recognition as well as, seamless and independent use.

p) Reducing Loud Music in Public Spaces Where Customer Service is Offered

Loud music in public spaces and service areas of obligated organizations that provide goods, services or facilities is likely annoying to many if not most customers. For people with certain

disabilities, this loud music can go beyond annoyance. It can constitute a real and serious barrier. This is raised in *the Manitoba Discussion Paper on An Initial Proposed Customer Service Standard*. For some people with autism, it can be the same as shining a blinding light in one's eyes. For a person who is hard of hearing, it can prevent carrying on a conversation. For people with vision loss, it can make it hard or even impossible to navigate independently, since sound is a key part of independent orientation and mobility.

The Customer Service Accessibility Standard should be revised to require obligated organizations to have a policy that they will reduce the music volume or turn it off, when requested based on a disability-related accommodation need. This policy should be posted and periodically announced, where the obligated organization has regular spoken announcements or a telephone interactive voice response system. Where the obligated organization has a website, it should be posted there. The obligated organization should include, in its accessible Customer Service training, a requirement to train Customer Service staff on this policy and on how to turn down the volume. One might be surprised to learn that in some retail establishments, many employees that serve the public have no idea how to turn down or off the music volume, or even if it is permitted.

q) Reinforcing Policies with Public Announcements

As well, many of the above barriers and solutions are already being used by service providers. For instance, some public transportation outlets have adopted priority measures for serving persons with disabilities (for example, persons with disabilities enter a TTC bus first to ensure proper ramp use, and then have priority seating at the front of the bus).

These processes are helpful to ensure the access to accessible public transportation for persons with disabilities. However, as with many other accessibility measures, enforcement is a concern. Posted signage and visual announcements are encouraged, but should be augmented by audible public announcements that reinforce the need for priority service and act as public education tool on the existing policies.

r) Meaningful Enforcement Mechanisms

Even when obligated organizations have put policies and practices in place, the lack of meaningful enforcement mechanisms makes any progressive measures far less effective and useful for people with disabilities.

Appendix A

Background to the Customer Service Accessibility Standard and the Government's Review of It

On November 9, 2015, the Wynne Government posted online a summary of changes it proposes to make to the 2007 Customer Service Accessibility Standard and to the 2011 Integrated Accessibility Standards Regulation. Both accessibility standards were enacted under the Accessibility for Ontarians with Disabilities Act (AODA). Around January 29, 2016, the Government then posted for public comment the text of the proposed amendments to these accessibility standards on which it had invited public input late in 2015. The Government has given the public up to March 14, 2016 to provide feedback.

The Government enacted the Customer Service Accessibility Standard in 2007. It was the first accessibility standard enacted under the AODA. It was enacted just two years after the AODA was passed in 2005.

The Customer Service Accessibility Standard was based on recommendations by the Customer Service Standards Development Committee which the Ontario Government appointed under the AODA. Working as the first AODA Standards Development Committee, that committee did not operate with all the protections for people with disabilities that we later secured in 2007 promises from the Ontario Government. It did not include equal representation by people with disabilities. It did not vote on its proposals clause-by-clause. Disability sector representatives did not have the benefit of dedicated staff from the Accessibility Directorate of Ontario to assist them in their work.

The Ontario government promised all those reforms to the standards development process in the 2007 Ontario election. That was too late for the Customer Service Standards Development Committee. It was therefore not surprising that the 2007 Customer Service Accessibility Standard was very weak. The lopsided process by which it was developed tilted decisively against people with disabilities.

Shortly after the 2007 Customer Service Accessibility Standard was enacted, the AODA Alliance made public a detailed critique of its deficiencies. That analysis remains valid today. **The September 12, 2007 AODA Alliance analysis of the Customer Service Accessibility Standard** is available at <http://www.aodaalliance.org/strong-effective-aoda/09122007.asp>

Under the AODA, the Government was obliged to launch a review of the 2007 Customer Service Accessibility Standard by an AODA Standards Development Committee within five years of its enactment. That had to begin by the 2012 summer. The Government did not launch that mandatory review until the second half of 2013. It appointed Ontario's Accessibility Standards Advisory Council (ASAC) to conduct that review.

In March 2014, the Government made public, for public comment, ASAC's initial proposal for

making changes to the Customer Service Accessibility Standard. ASAC's initial proposals for revisions were very weak and inadequate. They were in part counterproductive and harmful to people with disabilities.

On April 4, 2014, the AODA Alliance submitted a detailed 50-page brief to ASAC. It gave our feedback on ASAC's initial proposals. It showed what was wrong with both the original Customer Service Accessibility Standard and with ASAC's proposals for revisions to that standard. The AODA Alliance's brief made constructive recommendations on what is needed to strengthen the Customer Service Accessibility Standard.

After receiving input from the public, ASAC formulated its final proposals to the Government on proposed revisions to the 2007 Customer Service Accessibility Standard. The Government made ASAC's final recommendations for revisions public on November 7, 2014.

On November 12, 2014, the AODA Alliance widely circulated ASAC's final proposals, in an AODA Alliance Update that strongly criticized them as inadequate. That Update stated:

“We urge the Government to immediately instruct the Accessibility Directorate of Ontario to develop meaningful, strong revisions to the Customer Service Accessibility that are not constrained by the weak and counterproductive proposals that ASAC has submitted. The Accessibility Directorate of Ontario is part of the Ministry of Economic Development, Employment and Infrastructure – the Ontario Government Ministry with lead responsibility to implement and enforce the AODA.

The Government should use the AODA Alliance's April 4, 2014 brief to ASAC as the basis for these reforms. We would welcome the chance to work with the Government and other stakeholders on this.”

One year later, on November 9, 2015, the Government made public a summary of the changes it proposed to make to the 2007 Customer Service Accessibility Standard and the 2011 Integrated Accessibility Standards Regulation, followed around January 29, 2016 with the actual text of those proposed revisions.