



Accessibility Law Amendments Submission

This paper is respectfully submitted as it relates to accessible transportation issues and recommendations for the proposed accessibility legislation.

As part of community transportation in Nova Scotia, two formalized committees play a vital role in this regard. Community Transportation Nova Scotia (CTNS) handles the strategic and advocacy areas whereas the Rural Transportation Association (RTA) is essentially the mechanical or operational arm of community transportation. Furthermore, during 2016 the CTNS and RTA formed a working group called the Joint Task Group (JTG). The JTG is essentially a group focused on analysing issues and creating recommendations for CTNS and RTA to consider. One of the recent focal areas was reviewing the latest version of the proposed accessibility legislation prior to the law amendments consultation session. This paper serves as a positional viewpoint as it relates to transportation.

Overall, we felt the proposed legislation was far too weighted towards buildings and equipment as compared with transportation. We also believe our transportation standards will meet or exceed the actual legislation. For example, we believe accessible websites for community transportation services is very important but not necessarily a legislative requirement. Another overarching theme we believe should be included in any revisions of the proposed accessibility legislation should be a clause that all municipal governments within Nova Scotia "must" have both an accessible transportation service in addition to an accessible transportation plan. This is a very important issue and promote equality across the province. We believe this is an achievable initiative and strengthens the legislation.

The following are some comments based on the accessible transportation working group session.

- Examining ways for transportation standards to exceed legislation.
- The definition within the proposed legislation meets the standard and our policies and protocols can fit into this definition, when completed.
- Some areas we discussed, as it relates to disabilities included;
 1. Vision
 2. Hearing
 3. Mobility, cane, walker, wheelchair, crutches, scooter, slow reflexes, etc.
 4. Persons experiencing episodes of dizziness
 5. Maybe Alzheimer's and Dementia
 6. Maybe intellectually challenged
- Explore mandatory accessible Websites by transportation services
- Explore voice greetings and stops on buses
- The legislation needs to include a transportation responsibility, perhaps at the municipal level, for example, a mandatory service level, promotes an investment in accessible transportation. Need to change the conversation as it relates to accessible transportation.
- We need to work with the "Disabled Persons Commission" on accessible transportation becoming including in the legislation, as it is too weighted in buildings and structures currently.
- Proposed Section 3(1)-c, this proposed section needs to include transportation barriers and website as a communications barrier.
- Proposed Section 3(1)-o – much discussion was held around a public sector body as a definition, as it relates to municipal governments and more.
- Proposed Section 4(7)-e – we can assist in this area by expanding the tracking and reporting of accessibility users, currently only wheel chairs are reported and tracked. RTA can be a player in this area.
- Part listed under ACCESSIBILITY DIRECTORATE should include a clause under accessible transportation responsibility.
- Under ACCESSIBILITY STANDARDS, this area should include an accessibility transportation standard under proposed Section 2. *This is an area that CTNS can help advance over the next FY and should apply for funding to lead this area.*
- Under proposed Section 27, the phrase – An Accessibility Standard MAY should be SHALL or MUST.
- Both proposed Sections 28 and 29 should include transportation.
- Under proposed Section 39, in addition having a publicly available plan, this also include an accessible transportation *service*.
- Under the category of COMPLIANCE and ENFORCEMENT, proposed Sections 47(2)-b should include accessible vehicles in addition to physical premises and equipment.
- Also, under COMPLIANCE and ENFORCEMENT, many areas should include standards which could be governed under regulations versus the Act.

- Under proposed Section 69, subsection c relates to a clause pursuant to 23(1)-e and this does not exist in the proposed Act.
- Proposed section 69(1)-e must can be built on this area as it relates to accessibility standards as it relates to transportation. *This is another areas which the CTNS should be leading.*
- Under the proposed Section 69(1)-h, we recommend adding service along with a joint accessibility plan.

Overall this was a valuable session and illustrates how we can be leaders in the area of accessible transportation. Much remains to be done but first of all, CTNS should be the strategic lead in the area.

Dale A. Bogle
Antigonish Community Transit
Treasurer – CTNS
Member – RTA
Member – CTNS-RTA JTG