



Express Scripts Canada[®]

Multi-Year Accessibility Plan

Period 2013 - 2016

Accessibility for Ontarians with Disabilities Act, 2005

Ontario Regulation 191/11 Integrated Accessibility Standards

Multi-Year Accessibility Plan

Introduction

In 2005, the government of Ontario passed the Accessibility for Ontario with Disabilities Act (AODA). This legislation is designed to help businesses and organizations meet the needs of a growing segment of our population, people with disabilities. The Integrated Accessibility Standards Regulations (IASR) under the AODA require that, effective January 1, 2014, Express Scripts Canada (ESC) establish and maintain a multi-year accessibility plan.

Under the AODA, the following accessibility standards are applicable to Express Scripts Canada:

- Customer service
- Information and communication
- Employment
- Built environment

The multi-year accessibility plan is a fluid document and framework that provides high level deliverables and activities over the next 3 to 5 years. The plan identifies our accomplishments to date, and outlines the next steps of our efforts to identify and remove barriers for people with disabilities in accordance with the ISAR.

Commitment to Accessibility

Express Scripts Canada is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by:

- preventing and removing barriers to accessibility and
- meeting the accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

Express Scripts Canada has established an AODA Committee that will provide input regarding accessibility issues and champion the successful implementation of accessibility initiatives. The committee is responsible for reviewing the annual status report which will address the outcomes, deliverables and activities as stated in this plan and to contribute to changes of this plan as required.

General Requirements					
Section	Initiative	Description	Action	Status	Compliance Date
3	§ Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	<ul style="list-style-type: none"> • Policy prepared and approved • Policy can be found at: www.express-scripts.ca/accessibility 	Completed	January 1, 2014
4	Accessibility Plans	4.(1) Large organizations shall, <ul style="list-style-type: none"> • establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation; • post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and • review and update the accessibility plan at least once every five years 	<ul style="list-style-type: none"> • Developed a multi-year accessibility plan in consultation with ESC's AODA Committee to address the requirements to be met between 2013-2018 • Multi-year plan can be found at www.express-scripts.ca/accessibility • Develop an annual status report on the multi-year plan in collaboration with the AODA Committee 	Completed	January 1, 2014

Information and Communications Standards					
Section	Initiative	Description	Action	Status	Compliance Date
14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.	<ul style="list-style-type: none"> • ESC will ensure all website and content conform to guidelines • Departments will be informed of their responsibility to ensure website compliance under AODA 	Completed	January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than, <ul style="list-style-type: none"> • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5 Audio Descriptions (Pre-recorded)

General Requirements					
Section	Initiative	Description	Action	Status	Compliance Date
7	Training	<p>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,</p> <p>all employees, and volunteers;</p> <ul style="list-style-type: none"> • all persons who participate in developing the organization's policies; and • all other persons who provide goods, services or facilities on behalf of the organization. 	<ul style="list-style-type: none"> • ESC will review plans to deliver training sessions to all employees, new hires, volunteers and contractors • Implement a record keeping system to record training completion • Included in 2014 training budget 	Completed	January 1, 2015

Information and Communications Standards					
Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	<ul style="list-style-type: none"> • Conduct a review of all internal and external feedback and determine what alternate formats that we would provide • Develop communication strategy to ensure all employees are aware of the feedback process 	Completed	January 1, 2015

Information and Communications Standards					
Section	Initiative	Description	Action	Status	Compliance Date
12	Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, <ul style="list-style-type: none"> in a timely manner that takes into account the person's accessibility needs due to disability; and at a cost that is no more than the regular cost charged to other persons. 	<ul style="list-style-type: none"> Conduct a review of all main formats and communication and identify alternative options that we will offer Upon request, offer accessible options and source additional communication aids and other devices to be prepared for such requests 	Completed	January 1, 2016
		12. (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> Provide accessible formats and communication upon request and develop a protocol for situations when a request is made 	Completed	January 1, 2016
		12. (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<ul style="list-style-type: none"> Include wording on ESC website and indicate on policies 	Completed	January 1, 2016

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Employment Standard					
Section	Initiative	Description	Action	Status	Compliance Date
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	<ul style="list-style-type: none"> Applicants are notified on the external website of ESC’s commitment to providing equal opportunities for persons with disabilities including accommodation during employment 	Completed	January 1, 2016
23	Recruitment, Assessment or Selection Process	<p>23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>(2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.</p>	<ul style="list-style-type: none"> Review employment systems and identify barriers that can present themselves in the recruitment process to ensure accessibility Develop interview guidelines in the recruitment process and train management Review vendor service agreements to ensure they are AODA compliant Individuals selected are notified of accommodation, support and accessibility during the initial phone 	Completed	January 1, 2016

Employment Standard					
Section	Initiative	Description	Action	Status	Compliance Date
			interview		
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	<ul style="list-style-type: none"> Offer Letter of Employment contains statement advising the employee of the accommodation policy and individualized emergency evacuation plan 	Completed	January 1, 2016
25	Informing Employees of Supports	25. (1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	<ul style="list-style-type: none"> Communicate policies and provide guidance on accommodation to all employees and new hires 	Completed	January 1, 2016
		25. (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<ul style="list-style-type: none"> Communicate accommodation policy to all employees and new hires, including permanent, contractor, and volunteers as part of the New Employee Orientation 	Completed	January 1, 2016
		25. (3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility	<ul style="list-style-type: none"> Communicate policies and provide guidance on accommodation to all employees and new hires 	Completed	January 1, 2016

Employment Standard					
Section	Initiative	Description	Action	Status	Compliance Date
		needs due to disability.			
26	Accessible Formats & Communication Supports for Employees	26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, <ul style="list-style-type: none"> (a) information that is needed in order to perform the employee’s job; and (b) information that is generally available to employees in the workplace. 	<ul style="list-style-type: none"> • Develop a process to address such requests and communicate the process to all employees • Review policies and procedures and assess job descriptions for the provision of job accommodations 	Completed	January 1, 2016
		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> • Develop and document a process to understand standards required 	Completed	January 1, 2016
28	Documented Individual Accommodation Plans	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	<ul style="list-style-type: none"> • Currently developing process, procedures and protocol 	Completed	January 1, 2016

Employment Standard					
Section	Initiative	Description	Action	Status	Compliance Date
28		<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ul style="list-style-type: none"> • The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. • The means by which the employee is assessed on an individual basis. • The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense.. • The manner in which the employee can request the participation of a representative from their union. • The steps taken to protect the privacy of the employee's personal. • 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 	<ul style="list-style-type: none"> • ESC will review existing accommodation process • Develop a written process and review templates • Develop a communication strategy to communicate to all employees 	Completed`	January 1, 2016

		accessibility needs due to disability.			
Employment Standard					
Section	Initiative	Description	Action	Status	Compliance Date
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <ul style="list-style-type: none"> shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and shall document the process 	<ul style="list-style-type: none"> Create a return to work process to comply with requirements of AODA Communicate to all employees 	In progress	January 1, 2016
29		<p>29. (2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process</p>	<ul style="list-style-type: none"> Outline the steps that ESC will take for employees who are absent due to their disability Outline the steps that the employee will take if they are unable to work due to their disability 	In progress	January 1, 2016
		<p>29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>	<ul style="list-style-type: none"> Outline the steps that ESC will take for employees who are absent due to their disability Outline the steps that the employee will take if they are unable to work due to 	In progress	January 1, 2016

Employment Standard					
Section	Initiative	Description	Action	Status	Compliance Date
			their disability		
30	Performance Management	30.(1) 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.	<ul style="list-style-type: none"> ESC will review methods on conducting reviews and will take into account the accessibility needs of individuals with disabilities 	Completed	January 1, 2016
31	Career Development & Advancement	31.(1) 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.	<ul style="list-style-type: none"> ESC will review current processes and policies and revise to incorporate AODA requirements Implement a training plan to inform and guide management 	Completed	January 1, 2016
32	Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	<ul style="list-style-type: none"> Review redeployment process and outline steps to incorporate AODA requirements 	Completed	January 1, 2016

