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Final Report

Review of Accessibility

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Final Report**

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Executive Summary

Authority for the Project

This review was included in the 2002-2003 Audit and Evaluation Plan approved by the Public Works and Government Services (PWGSC) Audit and Review Committee.

Objective

To assess the degree to which PWGSC Crown-owned and leased buildings are meeting the objective of the Treasury Board *Real Property Accessibility* (RPA) Policy, “to ensure that persons with physical disabilities can gain access to, and use, federal real property”.

Scope

The scope of the review involved:

- on-site assessments of a national sample of Crown-owned and leased buildings; and
- the review of a number of lease documents to ensure accessibility clauses were included and compliant with the RPA Policy requirements.

The review included an examination of applicable documents in addition to interviews with personnel in the Operations Branch, Real Property Program Branch, selected regions (including the National Capital Area), and other PWGSC personnel. All regions were covered in the scope of the project.

Background

In 1990, to comply with the human rights legislation of the time, Treasury Board Secretariat introduced its *Real Property Accessibility Policy*, which was designed to ensure barrier-free access to, and use of, government facilities. The RPA Policy describes federal standards, such as requirements for parking spaces, power-operated doors, accessible washrooms, tactile signage, assistive listening systems, and many other building features that may impact people with disabilities. The policy also refers to the Canadian Standards Association (CSA) CAN/CSA-B651-95, *Barrier-Free Design*, for details on how to make a component usable by persons with disabilities. Implementation of the RPA policy began in 1990, when the department initiated its accessibility upgrading program. It is estimated that PWGSC has since invested over

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\$75 million in base building accessibility upgrades, as well as over \$20 million annually in rental premiums as a result of calling for building owners to upgrade leased facilities.¹

Accessibility to federal facilities by persons with disabilities is a legal, as well as a policy, requirement. On June 30, 1998, amendments to the Canadian Human Rights Act (CHRA) took a further step in protecting Canadians from discrimination. Under the CHRA, it is a discriminatory practice for federal organizations to deny persons with disabilities access to Crown-owned or Crown-leased facilities. The law expressly requires that the government accommodate the special needs of employees and service users, which includes persons with disabilities, protected under the Act. If basic standards are not sufficient to fulfill a special need, employers and service providers within the federal government must consider additional measures. Hence, the PWGSC *Duty of Accommodation* is intended to “ensure that all reasonable steps are taken in both Crown-owned and leased real property to appropriately accommodate special needs for facility access and use by individuals with physical disabilities, even when these needs exceed the requirements of the current edition of the Treasury Board RPA policy”.

In fiscal year 2001-2002, the Audit and Ethics Branch conducted an audit (2001-642) to assess the adequacy of management controls related to PWGSC’s accessibility program. As a follow-up to the audit results, this study focussed on the success of the program as it relates to the requirements of the RPA policy.

Key Observations and Conclusions

National compliance results by category of standards

The Audit of Accessibility (2001-642) Final Report recommended that “appropriate mechanisms be put in place to effectively monitor the implementation of the accessibility policy at the national and regional levels”. The Action Plan for this recommendation indicated that results are to be reported on an annual basis. These mechanisms, when fully implemented, should permit annual comparisons and help gauge overall progress.

As these mechanisms were not yet in place, AEB developed a standards checklist in consultation with RPSB for the purpose of this review. Ten categories of specific standards were identified from the CSA CAN/CSA-B651-95, *Barrier-Free Design*, including: accessible entrances, parking, interior, counters, open circular stairs, elevators, washrooms, fountains, public/common areas, and tactile signage.

On site building assessments were conducted in every region, including NCA. A risk-based approach was used to determine which assets to include and this resulted in a population of approximately 1100 buildings consisting of Crown-owned, leased, and lease-purchase facilities. From these, a sample of 102 buildings was extracted using a combination of random and judgemental sampling.

¹ Based on statistics cited in the PWGSC publication “Ensuring Access: The Duty to Accommodate” (1999).

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The data gathered using the standards checklist developed showed that the overall national compliance average was 77%. Two categories, counters and tactile signage, had lower compliance scores.

Facilities with high vs. low compliance scores

Facilities with a compliance score of 90% or greater included mostly larger buildings with areas greater than 10,000 m² and housed one hundred workers or greater. Most facilities with a compliance score of 60% or less were smaller than 10,000 m² and housed less than one hundred workers.

Lease documentation review

A number of lease documents were reviewed to ensure that accessibility clauses were included and compliant with the Accessibility Policy requirements. Where practicable, all leases had a clause or clauses referring to accessibility of the leased space. The majority of these clauses referred to meeting the technical standards of CAN/CSA-B651-90 or CAN/CSA-B651-95.

Conclusion

Measuring the progress made by PWGSC since the introduction of the RPA Policy in 1990 is challenging as there is no comparable baseline data at this time against which the degree of progress can be compared.

Departmental policy including the PWGSC *Duty of Accommodation* and ongoing initiatives, such as, application of CSA CAN/CSA-B651-95, *Barrier-Free Design*, provide evidence that attention is being paid to accessibility in connection with Crown-owned and leased buildings issues within PWGSC. The Department is continuously working towards fully meeting the objective of the Treasury Board *Real Property Accessibility Policy* “to ensure that persons with physical disabilities can gain access to, and use, federal real property” .

There are no recommendations as a result of this study.

1 Introduction

1.1 Authority for the Project

This review was included in the 2002-2003 Audit and Evaluation Plan approved by the Public Works and Government Services (PWGSC) Audit and Review Committee.

1.2 Objective

To assess the degree to which PWGSC Crown-owned and leased buildings are meeting the objective of the Treasury Board *Real Property Accessibility* (RPA) Policy, “to ensure that persons with physical disabilities can gain access to, and use, federal real property”.

1.3 Scope

The scope of the review involved:

- on-site assessments of a national sample of Crown-owned and leased buildings; and
- the review of a number of lease documents to ensure accessibility clauses were included and compliant with the RPA Policy requirements.

The review included an examination of applicable documents in addition to interviews with personnel in the Operations Branch, Real Property Program Branch, selected regions (including the National Capital Area), and other PWGSC personnel. All regions were covered in the scope of the project.

1.4 Background

In 1990, to comply with the human rights legislation of the time, Treasury Board Secretariat introduced its *Real Property Accessibility Policy*, which was designed to ensure barrier-free access to, and use of, government facilities. The RPA Policy describes federal standards, such as requirements for parking spaces, power-operated doors, accessible washrooms, tactile signage, assistive listening systems, and many other building features that may impact people with disabilities. The policy also refers to the Canadian Standards Association (CSA) CAN/CSA-B651-95, *Barrier-Free Design*, for details on how to make a component usable by persons with disabilities. Implementation of the RPA policy began in 1990, when the department initiated its accessibility upgrading program. It is estimated that PWGSC has since invested over

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\$75 million in base building accessibility upgrades, as well as over \$20 million annually in rental premiums as a result of calling for building owners to upgrade leased facilities.²

Accessibility to federal facilities by persons with disabilities is a legal, as well as a policy, requirement. On June 30, 1998, amendments to the Canadian Human Rights Act (CHRA) took a further step in protecting Canadians from discrimination. Under the CHRA, it is a discriminatory practice for federal organizations to deny persons with disabilities access to Crown-owned or Crown-leased facilities. The law expressly requires that the government accommodate the special needs of employees and service users, which includes persons with disabilities, protected under the Act. If basic standards are not sufficient to fulfill a special need, employers and service providers within the federal government must consider additional measures. Hence, the PWGSC *Duty of Accommodation* is intended to “ensure that all reasonable steps are taken in both Crown-owned and leased real property to appropriately accommodate special needs for facility access and use by individuals with physical disabilities, even when these needs exceed the requirements of the current edition of the Treasury Board RPA policy”.

In fiscal year 2001-2002, the Audit and Ethics Branch conducted an audit (2001-642) to assess the adequacy of management controls related to PWGSC’s accessibility program. As a follow-up to the audit results, this study focussed on the success of the program as it relates to the requirements of the RPA policy.

1.5 Profile

PWGSC, through its Operations Branch (OB) and Real Property Program Branch (RPPB), is mandated with providing office accommodation for some 179,000 public servants and parliamentarians who work in more than 2,000 locations across the country. These branches perform two principal functions: real property stewardship and the provision of professional and technical services, which encompasses architecture and engineering services, real estate services, and property and facilities management. Through these functions, PWGSC has a major role in ensuring that the real property they administer is accessible to persons with disabilities and is in compliance with the Treasury Board accessibility policy.

Implementation and monitoring of the accessibility policy within PWGSC involves various sectors within OB and RPPB, including National Capital Operations and the regions.

A responsibility model was developed in the Phase I Audit of Accessibility which depicts the specific accessibility-related responsibilities of various stakeholders. Please note that the model was developed based on the previous organization of the Department. Viewed from a broader perspective which focused on results, four main activities are undertaken by the Department in order to achieve various intermediate and longer term outcomes, specifically:

² Based on statistics cited in the PWGSC publication “Ensuring Access: The Duty to Accommodate” (1999).

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- establishing and maintaining the departmental policy framework;
- identifying and incorporating accessibility requirements into project delivery;
- delivering accessibility projects;
- monitoring and Reporting on Performance.

A logic model depicting these activities, along with the associated outputs and outcomes, is presented in Appendix A.

2 Approach and Methodology

2.1 On-site assessments of Crown-owned and leased buildings

An evaluation checklist was developed for individual building inspections based on the key elements of the RPA policy and associated accessibility standards. The checklist was based on key elements of the Treasury Board Real Property Accessibility Policy, the Canadian Standards Association's CAN/CSA-B651-95, *Barrier-Free Design*, and related best practices.³ It was pilot tested in the NCA during the Audit of Accessibility (2001-642).

A national sample of buildings managed by PWGSC was then selected for inspection against the checklist. Given that PWGSC manages a diverse array of real property across Canada, including those in remote locations, the audit team employed a risk-based approach in defining the overall population of assets to be assessed. Specifically, assets recently designated as being surplus and special-purpose facilities such as warehouses, were excluded, as were buildings which were greater than a four-hour drive from major centres. This resulted in a population of approximately 1100 buildings consisting of Crown-owned, leased, and lease-purchase facilities.⁴ A sample of 102 buildings was selected using a combination of random and judgemental sampling. The distribution of the sample, by region, is shown in figure 1 below.

Figure 1 - Sampled Facilities by Region and Ownership

Region	Crown-owned or lease-purchase	Leased	Total	Percentage of sample
Atlantic	6	19	25	24.5%
NCA	6	8	14	13.7%
Ontario	5	17	22	21.6%
Pacific	3	6	9	8.8%
Quebec	6	17	23	22.5%
Western	1	8	9	8.8%
Total	27	75	102	100.0%

The sample covers a range of different size facilities measured by area (square metres) and number of occupants (Full Time Equivalent federal government employees).

³ Best practices considered include: Accessibility: Duty of Accommodation; Best Practice on Accessibility: Custodian/Client Responsibilities; Best Practice on Accessibility: Exemption Criteria and Approval Process.

⁴ Statistics obtained from the Facilities Inventory System (FIS) based on active assets as of May 29, 2001 indicated that, excluding surplus and special-purpose facilities, PWGSC is a custodian of 236 (15%) Crown-owned office buildings, 12 (2%) lease-purchase and 1,242 (83%) leased office buildings for a total of 1,490 buildings. Based on the results of a national random sample, it is estimated that 75% of this population, or 1100 facilities, is located within a four-hour drive of major Canadian centres.

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Figure 2 provides a breakdown of the sample by number of facilities that fall within strata for FTEs and square metres.

Figure 2 - Breakdown of Facilities by Area and Number of Occupants

Area (sq. m.)	# Occupants(FTEs)							Total Number of Facilities
	0	1 - 10	11 - 50	51 - 250	251 - 500	501 - 2500	>2500	
0-100	5	2						7
101-500	1	14	7					22
501-1000	1	5	13					19
1001-2500		2	5	5				12
2501-5000			1	13				14
5001-25000	1		3	3	8	3		18
25001-50000						5		5
>50000						2	3	5
Total Number of Facilities	8	23	29	21	8	10	3	102

2.2 Review of lease documentation

Of the 102 facilities included in the on-site assessments, 75 were leased by PWGSC from the private sector. Given that one or more leases could be associated with a given building, the evaluation team reviewed all of the lease documents to determine whether accessibility clauses were included and compliant with the Accessibility Policy requirements.

3 Observations and Conclusions

3.1 Results of on-site inspections

3.1.1 National compliance results by category of standards

To facilitate analysis of the data, the evaluation checklist used during on site assessments was divided into categories of accessibility patterned after those used in CAN/CSA-B651-95, *Barrier-Free Design*, and TB RPA Policy. The categories examined were titled: accessible entrances, parking, interior, counters, open circulation stairs, elevators, washrooms, fountains, public/ common areas, and tactile signage. The team sought to confirm expectations that PWGSC Crown-owned and leased buildings have a high level of compliance for each category identified. By summing the category scores, a facility compliance score was tabulated and represents the degree to which the facility is adhering to the accessibility standards examined.

A risk-based approach was employed to determine which categories and elements of accessibility within each category to include in the audit. The result was that not all aspects of the Treasury Board RPA Policy or CSA Barrier Free Design Standards were examined. Each question was related to a standard and was scored with a result of positive, negative, or not applicable (if the question did not apply to the particular facility being assessed).

The national compliance average, including all categories, was found to be 77%.

A brief description and findings from each category are presented below.

Accessible Entrances

This category examined building features that could affect someone's ability to enter or exit a facility. Areas examined included entrance ramps (slope, width, surface, landing area), entrance doors (width, opening devices), and signage (identification, directional).

The range of scores for questions related to entrance ramps, entrance doors and building identification signage was 75% to 96% compliance. However, with regard to signage indicating the location of an accessible entrance, if some doors were inaccessible, 40% of the facilities requiring such signage had it in place.

Parking

The areas examined in this category included accessible parking spaces (number, size, path and proximity to the facility), signage, and routes from public transit stops to the facility.

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The greatest compliance in the parking category was with the proximity and path to facilities from accessible parking spaces and public transportation stops. Scores for questions related to these aspects of parking accessibility ranged from 81% to 91% compliance. Signage used to indicate accessible parking spaces was adequate in the majority of cases (65% compliance for signage on the walls and 74% compliance for signage on the pavement). In 48% of sampled facilities, accessible parking spaces met the minimum width requirements.

Interior

This category sought to ensure that standards were met to allow for safe and accessible passage through public/working spaces inside facilities examined. The team assessed directional signage, corridor widths, floor surfaces, objects protruding from walls and the distance between doors in series.

The majority of the interior category had a very high compliance score varying between 90% and 99% for all questions applying to at least 30 of the 102 facilities examined. Lower compliance scores were observed for the question on the existence of directional signage to indicate alternative accessible routes where required. Of the facilities where this question was applicable, 68% (15 out of 24) had adequate directional signage to indicate alternative accessible routes.

Counters

In this category, the team measured the height of counters in areas where the public required access to ensure that there is at least one alternative writing surface available at the height dictated by the standards.

Where applicable, 47% of the counters were in compliance with the standard for surface height.

Open circulation stairs

This category examined stairs that were regularly used by employees or the public, excluding emergency/fire exit stairwells. This category sought to determine if a ramp or elevator was available as an alternate to the stairs and if the stairs met standards for handrails, risers and treads (solid and contrasting colour), and sufficiency of lighting.

The results show compliance scores ranging from 78% to 85% for the majority of questions in this category; two questions however, had lower compliance. In 58% of applicable cases, there was colour contrast between the top side of each stair nosing and the tread. Handrails meeting the standards, with adequate extensions at the top and bottom, were observed in 48% of cases.

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Elevators

This category examined compliance to standards in terms of dimensions (door opening, interior space), floor finish, controls (height, raised characters), height of signage on door jambs, visual and audible indicators of travel, volume controls on telephones, and height of handrails.

The most significant observation in the elevator category is that in 25% of cases, the emergency communication device (telephone) was equipped with volume control. In 69% of cases handrails in the elevator cars were of sufficient height, and in 63% of applicable facilities there were raised letter signs at the proper height on the door jams outside elevator doors. The balance of scores for areas examined in this category ranged from 76% to 92%.

Washrooms

This category sought to determine if washroom entrances, interior space and features meet accessibility standards. Elements examined included opening mechanisms of the entrance doors, washroom stalls (dimensions, door swing path, locking mechanism, height of grab bars and toilet seat, existence of back support on the toilet), and the height of the counter or sink, towel dispensers and waste receptacles.

Washroom compliance scores generally varied between 70 and 80% with the exception of toilet seats which were at the proper height in 61% of cases, and back support which was present in 67% of cases.

Fountains

In this category, three aspects affecting fountain accessibility were examined: sufficiency of space for approach, height of drinking spout, and existence of lever or push bar controls.

Fountains were found to have an accessible approach and controls in 81% and 76% of cases, respectively. In 51% of cases, the drinking spout was located at an accessible height.

Public/common areas

This category refers to accessibility issues in public spaces and common working spaces. It sought to determine compliance to standards for the following items: cafeterias, public (pay) telephones, patios, lounges, recreational and eating areas, libraries, daycare, walkways, public doors, meeting and training rooms, spaces for business machines, and auditoriums. Attention was focused on assessing whether the route, ramps and doorways to access these spaces were sufficient to make the spaces accessible.

Compliance scores were high in this section with the majority of questions showing over 90% compliance where applicable. The only notable observation is that there are rarely any telephones equipped for persons with a hearing disability. In facilities where public (pay) telephones are provided, volume control devices are present in 28% cases.

Tactile Signage

This category sought to examine if signage was present to identify washrooms and stairwells. In this category, compliance scores were consistently low. Tactile signage was present beside washrooms 45% of the time and beside stairwells 51% of the time.

3.1.2 Facilities with high vs. low compliance scores

The majority of the facilities sampled (73 out of 102) scored within the 60 to 90% range. The remainder were broken down into two groups of approximately the same size; one group consisting of 15 buildings that scored greater than 90%, and the other of 14 that scored 60% or less.

Facilities with a compliance score of 90% or greater

The mean score for this group was 93.5%. This group consists of nine leased buildings and six Crown-owned buildings. Half of the group (eight out of 15) was made up of larger buildings, with areas greater than 10,000 m²; as well, eight of the buildings housed 100 workers or more.

Facilities with a compliance score of 60% or less

The mean score for this group was 50.7%. This group consists of 11 leased buildings and three Crown-owned buildings. As opposed to the group of facilities above, no buildings in this group consisted of an area greater than 10,000 m²; half of the group had areas greater than 1,000 m². Only three of the buildings housed 100 workers or more.

3.2 Results of lease documentation review

The review of a number of lease documents to ensure accessibility clauses were included and compliant with the Accessibility Policy requirements. Where practicable, all leases had a clause or clauses referring to accessibility of the leased space. The majority of these clauses referred to meeting the technical standards of CAN/CSA-B651-90 or CAN/CSA-B651-95.

3.3 Conclusion

With an asset base as vast and diverse as that of PWGSC, ensuring that facilities are accessible to persons with physical disabilities is an activity that requires significant coordination, resources, and time. As a major real property custodian for the Government of Canada, PWGSC has the opportunity to have a direct impact on the quality of life of Canadians, which is emerging as a key government priority.

Measuring the progress made by PWGSC since the introduction of the RPA Policy in 1990 is challenging as there is no comparable baseline data at this time against which the degree of progress can be compared.

Departmental policy including the PWGSC *Duty of Accommodation* and ongoing initiatives, such as, application of CSA CAN/CSA-B651-95, *Barrier-Free Design*, provide evidence that attention is being paid to accessibility in connection with Crown-owned and leased buildings issues within PWGSC. The Department is continuously working towards fully meeting the objective of the Treasury Board *Real Property Accessibility Policy* “to ensure that persons with physical disabilities can gain access to, and use, federal real property” .

There are no recommendations as a result of this study.

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Appendix A - Logic Model for Accessibility: PWGSC

