

2001-642 Final Report

Audit of Accessibility - Phase I

2002-06-03



Public Works and
Government Services
Canada

Audit and Ethics

Travaux publics et
Services gouvernementaux
Canada

Vérification et Éthique

Canada

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Executive Summary

Authority for the Project

This audit is part of the 2001/2002 Audit and Review Plan approved by the Public Works and Government Services Canada (PWGSC) Audit and Review Committee.

Objectives

The objectives for Phase I and II are as follows:

Phase I

- to assess the adequacy of the management controls in place to enable PWGSC to implement the Treasury Board (TB) *Real Property Accessibility (RPA) Policy*;
- to examine whether the recommendations made in the 1993/94 audit of TB RPA Policy have been successfully implemented; and

Phase II

- to assess the degree to which PWGSC Crown-owned and leased buildings are meeting their objectives as defined by the TB RPA Policy.

Scope

The audit scope for Phase I included the review of:

- policies, procedures and structures in place to enable PWGSC compliance with the TB RPA Policy;
- processes, practices and controls used to manage the policy;
- the operating environment and relationships with clients/stakeholders; and,
- recommendations made in the 1993/94 audit of real property accessibility to determine if they have been successfully implemented.

Phase I also included a review of any applicable documents in addition to interviews with personnel in the Real Property Services Branch (RPSB), Regions (including the National Capital Area), other PWGSC personnel and main stakeholders as required. In December 2001 and January 2002, the audit team performed an on-site audit to validate the checklist and the questionnaire to be used in Phase II.

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The audit objective and approach used to address the two objectives of Phase I are detailed in Appendix D.

In 2002/2003 (Phase II), an evaluation of real property accessibility will be conducted. It will include the review of leases to ensure compliance with TB RPA Policy requirements and regional on-site assessments, on a statistically representative sample of Crown-owned and leased buildings, to evaluate the extent of compliance with the TB RPA Policy.

Background

In 1990, to comply with the human rights legislation of the time, Treasury Board Secretariat (TBS) introduced its RPA Policy designed to ensure barrier-free access to, and use of, government facilities. The policy also refers to the Canadian Standards Association's Barrier-Free Design Standard for details on how to make a component, such as a door or a drinking fountain, usable by a person with a disability. As a result, the PWGSC accessibility upgrading program began in 1990.

PWGSC is considered to be at the forefront of barrier-free design. The department has invested approximately \$75 million in base building accessibility upgrades, and additionally spent an estimated \$22 million per year in rental premiums as a result of requiring building owners to upgrade leased facilities. 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 following excerpt from the January 30, 2001 Speech from the Throne confirms the government's commitment to persons with disabilities: "Persons with disabilities face barriers to full participation in the economy and society. The Government of Canada will work with the provinces and territories and other partners toward a comprehensive labour-market strategy for persons with disabilities".

Statistics obtained from the Facilities Inventory System (FIS) based on active assets as of May 29, 2001 indicated that 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. This does not include surplus, special properties and common use facilities. For more detail, please refer to Appendix B.

The implementation and the monitoring of the accessibility policy in PWGSC involves various sectors within RPSB, National Capital Operations and the Regions. Please refer to Section 1.4 of the audit report (Background - p.8-9) for a summary of roles and responsibilities and a responsibility model.

Key Findings

Implementation of the Accessibility Policy

Adequate management controls have been established for the implementation of the accessibility policy.

The TB accessibility policy was found to be well known within PWGSC and accessibility has been given high priority. With the exception of monitoring, it was found that implementation of roles and responsibilities are well defined. That is, accessibility clauses are required to be included in leases, accessibility requirements addressed in building projects, experts consulted accordingly and accessibility issues included in asset and building management plans. In addition, procedures, policies, guidelines, accessibility check lists and annual and evaluation reports have been issued by PWGSC.

Monitoring of the Implementation of the Accessibility Policy

The timeliness, level of detail and reliability of the annual accessibility report, a key monitoring tool, requires improvement.

Various tools are used by Owner/Investor (O/I), Office Accommodation/Real Estate Services (OARES), to monitor the implementation of the accessibility policy. At the national and regional level, O/I deals with policy issues, promotion and guidance of the accessibility policy. In addition, the regions provide advice on project funding for accessibility projects and use monitoring tools such as regional annual accessibility reports, asset management plans, building performance review reports, building management plans, project plans and internal accessibility evaluation reports. Moreover, in one region a committee has been established to deal with accessibility issues.

Nationally, Maintenance Management, Asset and Facilities Management Services (AFMS) rolls up regional information into a national annual accessibility report and provides it to O/I. The national annual accessibility report is potentially a key monitoring tool. The audit team was informed by management that reports were prepared for 1997/98, 1998/99 and 2000/01, however, these could not be located for review by the audit team. Moreover, the 1999/2000 annual accessibility report was found to be incomplete. Since the regions feed into the national annual report, gaps in regional information have an impact on national monitoring.

It was also found that the level of detail contained in the report is insufficient for effective monitoring. Specifically, while the report indicates whether or not a building complies with the policy, there is no indication of the degree of compliance and the nature of the non-compliant issues. For example, under the current reporting format, a building that is 95% compliant versus one that is 60% compliant would be presented identically - both categorized as non-compliant. Similarly, no distinction is made between minor and significant non-compliance issues.

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Also, considering the large number of TB RPA policy requirements, there is a high probability that buildings may not all meet 100% of the requirements. For instance, of the 10 buildings audited in the pilot exercise in December 2001 and January 2002, the majority were around 90% compliant. Under the present format requirements, these buildings would have to be reported as non-compliant regardless of the high scores which they exhibited.

Until 1997, PWGSC was required to send an annual accessibility report to TBS. This report included the degree of compliance of the buildings and an indication as to how exempted buildings are categorized. However, under the current reporting format, in use since 1998, regions categorize similar buildings differently. For example, there are inconsistencies in how exempted buildings, tactile signage requirements and non-active buildings such as storage-only space and surplus offices are categorized in the annual report. The utility of the information for decision making is therefore questionable.

During the current audit, conflicting information arose as to the level of compliance of the buildings with the policy. For example, the 2001/02 annual report, not yet finalized, indicates that 56% of buildings were compliant. In addition, the 1997 annual report submitted to TBS indicated that 48% of buildings complied 100% to the TB RPA policy. On the other hand, the interviews conducted by the audit team indicated a high level of perceived compliance and that non-compliant areas were relatively minor. The audit team conducted an on-site pilot exercise of buildings in the National Capital Area in December 2001 and January 2002 which indicated a high level of compliance. It is recognized that, due to the type of information provided in the annual accessibility report, the extent of progress made in upgrading the buildings may be understated. As a result, assurance cannot be provided as to whether the objectives of complying with the TB RPA Policy have been achieved.

Agreement is needed regarding the current roles and responsibilities for monitoring implementation of the accessibility policy at the regional and national level.

The PWGSC policy, *Accessibility: Duty of Accommodation* (1999), identifies O/I, as responsible for the monitoring of the implementation of the accessibility policy. A number of sectors within the department such as AFMS and the National Client Service Sector (Client Service Units), also monitor the performance of buildings through specific projects including accessibility projects and review of Building Management Plans and Asset Management Plans. However, based on interviews conducted by the audit team, there is a lack of agreement as to who should assume the lead role to effectively monitor the implementation of the accessibility policy. There is little or no active monitoring to determine the extent to which buildings comply with the policy on a national and regional basis.

Follow-up to the Recommendations from the 1993/94 Audit Report

Six of the seven recommendations made in the 1993/94 Audit of Real Property Accessibility have been addressed. However, the recommendation that the majority of buildings should be compliant by 1995 cannot be verified.

The outstanding recommendation in the 1993/94 audit report stated that the Crown-owned and leased portfolios would be prioritized, directing the department to make the majority of buildings fully accessible by the 1995 TB deadline. The 1993/94 recommendations and the measures taken by management are summarized in Appendix C of the report. The present level of compliance could not be determined because of inconsistent information. Annual accessibility reports indicate a low level of compliance while interviews and the on-site audit (pilot exercise) of buildings indicate a high level of compliance.

The on-site assessment of buildings planned for 2002/03 (Phase II) will evaluate the extent to which PWGSC buildings are accessible and the level of compliance to the TB RPA Policy.

Conclusions

With the exception of monitoring, adequate management controls concerning the implementation of the TB RPA Policy have been established within the department and demonstrate a strong commitment to accessibility within PWGSC.

The annual accessibility report needs to be improved for effective monitoring and decision making and to reflect the current status of the buildings. Also, agreement is needed on who should assume the lead monitoring role.

Six of the seven recommendations made in the 1993/94 Audit of Real Property Accessibility have been addressed. However, the status of the outstanding recommendation, dealing with the extent to which PWGSC buildings are fully accessible, is unknown due to the type of information currently available.

Given its size, public profile, national scope, and impact on individual rights, the accessibility policy should be effectively monitored at the national and regional level to track performance of the department vis-à-vis compliance with the TB RPA Policy and enable follow-up on non compliant issues.

Recommendations

It is recommended that the ADM RPS ensure that:

1. *appropriate mechanisms are in place to effectively monitor the implementation of the accessibility policy at the national and regional levels; and*
2. *roles and responsibilities regarding the national and regional monitoring of the implementation of the accessibility policy are clarified to achieve agreement.*

1 Introduction

1.1 Authority for the Project

This audit is part of the 2001/2002 Audit and Review Plan approved by the Audit and Review Committee.

1.2 Objectives

The objectives for Phase I and II are as follows:

Phase I

- to assess the adequacy of the management controls in place to enable PWGSC to implement the Treasury Board (TB) *Real Property Accessibility (RPA) Policy*;
- to examine whether the recommendations made in the 1993/94 Audit of Real Property Accessibility have been successfully implemented; and

Phase II

- to assess the degree to which PWGSC Crown-owned and leased buildings are meeting their objectives as defined by the TB RPA Policy.

1.3 Scope

The audit scope for Phase I included the review of:

- policies, procedures and structures in place to enable PWGSC compliance with the TB RPA Policy;
- processes, practices and controls used to manage the policy;
- the operating environment and relationships with clients/stakeholders; and
- whether the recommendations made in the 1993/94 Audit of Real Property Accessibility have been successfully implemented.

Phase I also included a review of applicable documents in addition to interviews with personnel in the Real Property Services Branch (RPSB), Office Accommodation / Real Estate Services (OARES), Asset & Facilities Management Services (AFMS), Architectural and Engineering Services (AES), Regions (including the National Capital Area), other PWGSC personnel and main stakeholders as required.

Good management practices were used for the assessment of the management processes, practices and controls used by management for the implementation, monitoring and reporting of the accessibility policy. The audit objective and approach used to address the two objectives of

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Phase I are detailed in Appendix D. The audit team obtained information on policies, procedures, roles and responsibilities, reports and committees within the department dealing with accessibility. Please refer to Section 1.4 - Background (p.8-9) for a summary of these roles and responsibilities and a responsibility model.

In December 2001 and January 2002, the audit team performed an on-site audit to validate the checklist and the questionnaire to be used in Phase II. The pilot exercise consisted of an on-site audit of 10 buildings, within the NCA.

In 2002/2003 (Phase II), an evaluation of accessibility will be conducted. It will include the review of leases to ensure compliance with TB RPA Policy requirements and regional on-site assessments, on a statistically representative sample of Crown-owned and leased buildings, to evaluate the extent of compliance with the TB RPA Policy. The sample will be statistically selected from information provided in the Facilities Inventory Systems (FIS).

1.4 Background

In 1990, to comply with the human rights legislation of the time, Treasury Board Secretariat introduced its RPA Policy, designed to ensure barrier-free access to, and use of, government facilities. The RPA Policy describes federal standards. It describes requirements for parking spaces, power-operated doors, accessible washrooms, tactile signage, assistive listening systems and many other building features that may impact on persons with disabilities. The policy also refers to the Canadian Standards Association's Barrier-Free Design Standard (CAN CSA B651) for details on how to make a component, such as a door or a drinking fountain, usable by a person with a disability. Finally, the RPA Policy outlines circumstances in which it is not necessary to make facilities accessible - for example, an unattended monitoring station in remote locations. As a result, the PWGSC accessibility upgrading program began in 1990. PWGSC is considered to be at the forefront of barrier-free design. The department has invested approximately \$75 million in base building accessibility upgrades, and spent an estimated \$22 million extra per year in rental premiums as a result of requiring building owners to upgrade leased facilities.

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 services users, which includes persons with disabilities, protected under the Act. If basic standards are not enough to fulfill a special need, employers and service providers within the federal government must consider additional measures. Hence, the PWGSC *Duty of Accommodation* policy 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 TB RPA policy".

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The January 30, 2001 Speech from the Throne confirms the government's commitment to persons with disabilities: "Persons with disabilities face barriers to full participation in the economy and society. The Government of Canada will work with the provinces and territories and other partners toward a comprehensive labour-market strategy for persons with disabilities".

PWGSC has a major role in ensuring that the real property they administer is accessible to persons with disabilities and is in compliance with TB accessibility standards. It works with client departments to ensure they are also in compliance with the TB accessibility standards.

The TB RPA Policy was issued in 1993 and revised in 1998. In addition, PWGSC issued a number of policies in 1999 including: *Accessibility: Duty of Accommodation*, *Best Practice on Accessibility: Custodian/Client Responsibilities* and *Best Practice on Accessibility: Exemption Criteria and Approval Process*.

Volumes/Statistics

Statistics were obtained from the Facilities Inventory System (FIS) in October 2001 based on the active assets as of May 29, 2001, for PWGSC Crown-owned and leased buildings. This report indicated that the department 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. This does not include surplus, special properties and common use facilities. For more detail, please refer to Appendix B.

Organization/Roles and Responsibilities

Implementation and Application of the Accessibility Policy

The implementation and application of the accessibility policy is performed by the following key sectors in RPSB:

- The Regional Directors General, RPSB and the Executive Director, RPSB National Client Service Sector, "are accountable for the implementation of the policy in their areas of responsibility." Specifically, the Client Service Units (CSU) direct, deliver and implement accessibility projects and provide project funding for buildings; and
- Owner / Investor (O/I), OARES, RPSB "is responsible for the framework for application and monitoring of the policy."

Other Directorates within RPSB involved in the implementation of the accessibility policy are the following:

- Asset & Facilities Management Directorate, AFMS, prepares and distributes the national call letter for Building Management Plans;
- Leasing Policy and Strategic Project Directorate, OARES, establishes policies, guidelines and standard documentation on leasing which includes mandatory accessibility clauses;

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- Buildings Directorate, AES, provides technical and advice, and prepares accessibility evaluation reports; and
- Project Management Directorate, AES, provides project management services and advice, including accessibility, for the CSUs and consults the Building Directorate on projects and policies, as required.

The Regions have a similar structure for the implementation of the accessibility policy.

Monitoring the Implementation of the Accessibility Policy

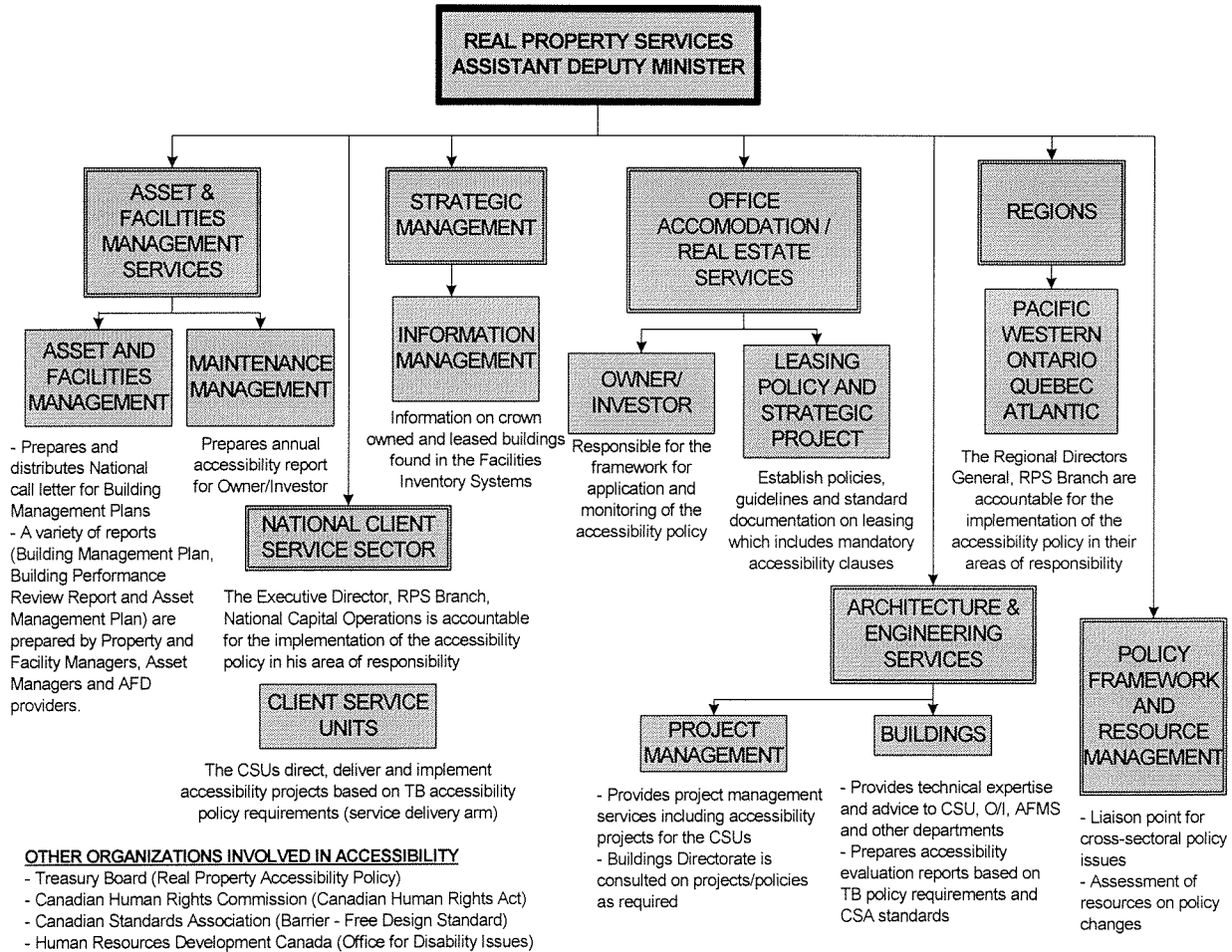
Owner/Investor “is responsible for the framework for application and monitoring of the policy” both in the NCO and the regions.

Maintenance Management Directorate, AFMS, collects information from the regions and prepares an Annual Accessibility Report which is provided for the use of O/I.

The audit team has prepared the following responsibility model for accessibility which briefly describes the major roles and responsibilities of the various sectors within RPSB.

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RESPONSIBILITY MODEL - ACCESSIBILITY



2 Findings, Conclusions and Recommendations

2.1 Implementation of the Accessibility Policy

Finding

Adequate management controls have been established for the implementation of the accessibility policy.

The TB accessibility policy was found to be well known within PWGSC and accessibility has been given high priority. With the exception of monitoring, it was found that implementation roles and responsibilities are well defined. That is, accessibility clauses are required to be included in leases, accessibility requirements addressed in building projects, experts consulted accordingly and accessibility issues included in asset and building management plans. In addition, procedures, policies, guidelines, accessibility check lists and annual and evaluation reports have been issued by PWGSC.

Conclusion

With the exception of monitoring, adequate management controls concerning the implementation of the TB RPA Policy have been established within the department and demonstrate a strong commitment to accessibility within PWGSC.

Recommendation

None

2.2 Monitoring the Implementation of the Accessibility Policy

Finding

The timeliness, level of detail and reliability of the annual accessibility report, a key monitoring tool, requires improvement.

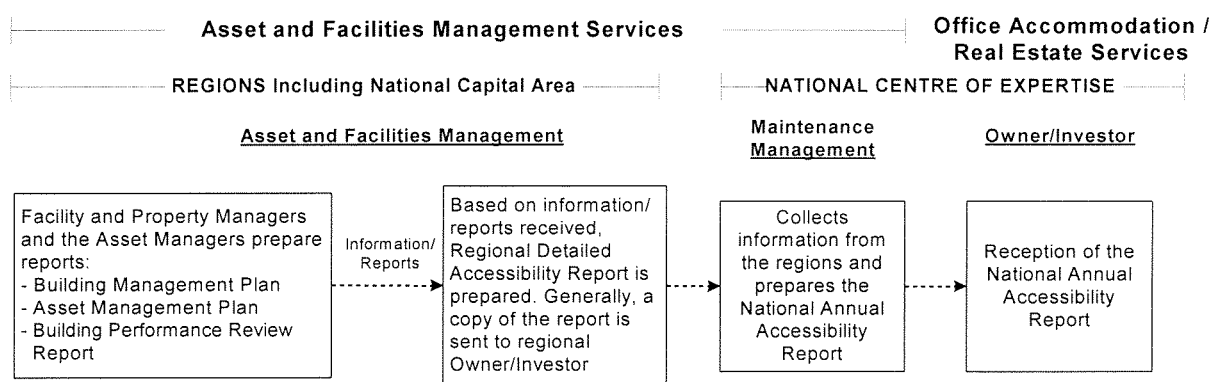
Various tools are used by Owner/Investor (O/I) to monitor the implementation of the accessibility policy. At the national and regional level, O/I deals with policy issues, promotion and guidance of the accessibility policy. In addition, the regions provide advice on project funding for accessibility projects and use monitoring tools such as regional accessibility reports, asset management plans, building performance review reports, building management plans, project plans and internal accessibility evaluation reports. Moreover, in one region a committee has been created to deal with accessibility issues.

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Nationally, AFMS rolls up regional information into a national annual accessibility report and provides it to O/I. The national annual accessibility report is potentially a key monitoring tool. The audit team was informed by management that reports were prepared for 1997/98, 1998/99 and 2000/01, however, these could not be located for review by the audit team. Moreover, the 1999/2000 annual accessibility report was found to be incomplete. Since the regions feed into the national annual report, gaps in regional information have an impact on national monitoring.

The audit team prepared the following process chart identifying the various parties involved in the preparation of the Annual Accessibility Report.

Process chart - Accessibility Annual Report



The national annual accessibility report provides information on the number of Crown-owned and leased buildings complying with the accessibility policy, tactile signage requirements and the number of exempted buildings, dollar value for non-compliant areas, coverage in the BMP and additional remarks if required. At the regional level, this information is collected by building and by category (Crown-owned, lease-purchase and lease).

The level of detail contained in the report is insufficient for effective monitoring. Specifically, while the report indicates whether or not a building complies with the policy, there is no indication of the degree of compliance and the nature of the non-compliant issues. For example, under the current reporting format, a building that is 95% compliant versus one that is 60% compliant would be presented identically - both categorized as non-compliant. Similarly, no distinction is made between minor and significant non-compliance issues. Non-compliance issues could be of a minor nature such as a boardroom having the wrong type of door knob as opposed to the absence of a ramp providing access to the main entrance.

Considering the large number of TB RPA policy requirements, there is a high probability that buildings may not all meet 100% of the requirements. For instance, of the 10 buildings audited in the pilot exercise in December 2001 and January 2002, the majority were around 90% compliant. Under the present format requirements, these buildings would have to be reported as non-compliant regardless of the high scores which they exhibited.

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Until 1997, PWGSC was required to send an annual accessibility report to TBS. This report included the degree of compliance of the buildings and an indication as to how exempted buildings are categorized. However, under the current reporting format, in use since 1998, regions categorize similar buildings differently. For example, there are inconsistencies in how exempted buildings, tactile signage requirements and non-active buildings such as storage-only space and surplus offices are categorized in the annual report. The utility of the information for decision making is therefore questionable.

Moreover, the annual accessibility report does not always provide details on non compliant areas such as reasons for non-compliance, target date to become compliant and the cost.

During the current audit, conflicting information arose as to the level of compliance to the policy. For example, the 2001/02 annual report, not yet finalized, indicates that 56% of buildings were compliant. In addition, the 1997 annual report submitted to TBS indicated that 48% of buildings complied 100% to the TB RPA Policy. On the other hand, the interviews conducted by the audit team indicated a high level of perceived compliance and that non-compliant areas were relatively minor. The audit team conducted an on-site pilot exercise of buildings in the National Capital Area in December 2001 and January 2002 which indicated a high level of compliance. It is recognized that due to the type of information provided in the annual accessibility report, the extent of progress made in upgrading the buildings may be understated. As a result, assurance cannot be provided as to whether the objectives of complying with the policy have been achieved.

Agreement is needed regarding the current roles and responsibilities for monitoring implementation of the accessibility policy at the regional and national level.

The PWGSC policy, *Accessibility: Duty of Accommodation* (1999), identifies O/I, OARES, RPSB as responsible for the monitoring of the implementation of the accessibility policy. A number of sectors within the department such as AFMS and the National Client Service Sector (Client Service Units), also monitor the performance of buildings through specific projects including accessibility projects and review of Building Management Plans and Asset Management Plans. However, based on interviews conducted by the audit team, there is a lack of agreement as to who should assume the lead role to monitor effectively the implementation of the accessibility policy. There is little or no active monitoring to determine the extent to which buildings comply with the policy on a national and regional basis.

Conclusion

The annual accessibility report needs to be improved for effective monitoring and decision making and to reflect the current status of the buildings. Also, agreement is needed on who should assume the lead monitoring role.

Given its size, public profile, national scope, and impact on individual rights, the accessibility policy should be effectively monitored at the national and regional level to track performance of

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the department vis-à-vis compliance to the TB RPA Policy and enable follow-up on non-compliant issues.

Recommendations

It is recommended that the ADM RPS ensure that:

1. *appropriate mechanisms are in place to effectively monitor the implementation of the accessibility policy at the national and regional levels; and*
2. *roles and responsibilities regarding the national and regional monitoring of the implementation of the accessibility policy are clarified to achieve agreement.*

2.3 Follow-up on 1993/94 Audit Recommendations from Audit Report

Six of the seven recommendations made in the 1993/94 Audit of Real Property Accessibility have been addressed. However, the recommendation that the majority of buildings should be compliant by 1995 cannot be verified.

Finding

The outstanding recommendation in the 1993/94 audit report stated that the Crown-owned and leased portfolios would be prioritized, directing the department to make the majority of buildings fully accessible by the 1995 TB deadline. The 1993/94 recommendations and the measures taken by management are summarized in Appendix C of the report. The present level of compliance could not be determined because of inconsistent information. Annual accessibility reports indicate a low level of compliance while interviews and the on-site audit (pilot exercise) of buildings indicate a contrastingly level of compliance.

The on-site assessment of buildings planned for 2002/03 (Phase II) will evaluate the extent to which PWGSC buildings are accessible and the level of compliance to the TB RPA Policy.

Conclusion

Six of the seven recommendations made in the 1993/94 Audit of Real Property Accessibility have been addressed. However, the status of the outstanding recommendation, dealing with the extent to which PWGSC buildings are fully accessible, is unknown due to the type of information currently available.

Recommendation

None. Status of PWGSC compliance to the TB RPA Policy to be addressed in Phase II.

3 Appendix A - List of Interviews

PWGSC employees

Architecture & Engineering Services

Georges Ens, Codes and Standards Architect

Asset and Facilities Management

Wayne Tomko, Director Asset and Facilities Management

Paul McCarthy, A/Director, Asset and Facilities Management

Resource Management

Joanne Vollmer, Manager

Maintenance Management

André Beauchamp, Manager

Pierre Nault, Electrical Maintenance Officer

Ralph Collins, Director

Client Services Unit

Jacques Renaud, former officer within AFD and Maintenance Management

Mark Campbell, Director National Client Service Unit #3

Kumar S. Sahni, Project Manager from Project Management Directorate assigned to CSU #3

Policy Framework and Resource Management

Brian Tilley, Policy Officer (former Owner/Investor employee)

Anne Auger, Policy Officer

Owner/Investor

Alexander McGregor, Director

Vivian St-Georges, Consultant

Grant Hannah, Investment Analyst

Yvon Roy, Manager

Leasing and Strategic Policy

Denise Pitre, Policy Manager

Deborah Allport, Policy Analyst

Dennis Caughey, Senior Leasing Advisor

Regions

Western Region: Terry Sperling, AFMS Officer

Alan Captsick, Owner/Investor Regional Manager

Québec Region: Jacques Bellefleur, Architectural Technician, Professional and
Technical Services

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Pacific Region: Michel Béland, Owner/Investor Regional Manager
Jim Turpin, Owner/Investor Regional Manager
Atlantic Region: Carol Buchanan, Owner/Investor Regional Manager
Holly Adams, Asset Manager
National Capital Area: Rhonda Nadon, Owner/Investor, Portfolio Manager

Canadian Human Rights Commission

Rhys Phillips, Sabine Luedtke, Harvey Goldberg and Karen Izzard

Treasury Board

Ruth Bradey, Accessibility Advisor

Human Resources Development Canada

Deborah Tunis, Office of Disability

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4 Appendix B - List of Crown-Owned and Leased Buildings

Regional Distribution of Crown-Owned/Purchase-Lease and Leased Buildings as per the Facilities Inventory System (FIS) (October 2001)

Region	Crown-Owned / Purchase-Lease	Leased	Total
New Brunswick	20	63	83
Newfoundland	21	67	88
Nova Scotia	23	79	102
Prince Edward Island	8	26	34
Atlantic	72 (29%)	235 (19%)	307 (21%)
Québec	35 (14%)	265 (21%)	300 (20%)
Ontario	38 (15%)	250 (20%)	288 (19%)
Alberta	5	85	90
Manitoba	6	57	63
Northern Territories	6	12	18
Saskatchewan	4	58	62
Western	21 (9%)	212 (17%)	233 (16%)
Nunavut	1	13	14
Québec	9	20	29
Ontario	37	109	146
National Capital Area	47 (19%)	142 (12%)	189 (13%)
British Columbia	32	136	168
Yukon Territories	3	2	5
Pacific	35 (14%)	138 (11%)	173 (11%)
Total	248 (100%)	1,242 (100%)	1,490 (100%)

5 Appendix C - 1993/94 Audit Recommendations from Audit Report

Recommendation	Measures taken by management
<p>In future, when undertaking large-scale projects such as the Accessibility Program, the Assistant Deputy Minister (ADM), Real Property Branch should ensure that a thorough preliminary study/evaluation be conducted so that all requirements and costs are identified. For future programs of this magnitude concerning real property, the ADM, Real Property Branch should ensure that joint branch committees representing the Real Property Branch and the Service Branches be established early in the process.</p>	<p>Met</p> <p>No other large-scale project was undertaken on accessibility since the 1993/94 audit. The majority of the disbursements for this program occurred between 1990/91 and 1997/98. No follow-up was done on other large-scale projects within the department. This would have been too time-consuming and not in the scope of this audit.</p> <p>It should be noted that Policy Framework and Resource Management Branch has been recently established and one of their roles is to act as a liaison point for cross-sectoral policy issues and to assess the resources and costs on new and existing policies including accessibility.</p>
<p>The Regional Directors (RDs), Realty Services Branch should ensure that further accessibility training be provided to Realty Property Managers. As well, technical experts within PWGSC should be utilized more effectively in the interpretation of Barrier Free Design standards and development of optimal solutions.</p>	<p>Met</p> <p>Accessibility training has been provided to Realty Property Managers on Leased and Crown-owned buildings.</p> <p>Technical experts from Architecture and Engineering Services (AES) are consulted on accessibility projects by the Client Service Units and by AFMS.</p>

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Recommendation	Measures taken by management
<p>The RDs, Real Property Branch should ensure that their Crown-owned and leased portfolios are prioritized so that the majority of buildings will be fully accessible by the 1995 TB deadline.</p>	<p>To be determined</p> <p>We were informed through our interviews that the department complies to a large extent with the TB accessibility policy and any non compliant areas would be for minor matters.</p> <p>However, the 2001/02 annual accessibility report, which allows for monitoring policy implementation, does not contain sufficient information to determine the type and relative significance of noted deficiencies. Actual compliance will be measured by AEB in Phase II - during FY 2002/03.</p>
<p>Consistent with the Department's commitment to service and support for health, safety and environmental considerations, the ADM, Real Property Branch should ensure that the appropriate actions are taken to promote accessibility awareness among clients/tenants. The ADM, Real Property Branch should ensure that the practice of tenants assuming responsibility for non-accessible accommodation be reviewed by the PWGSC Legal Services Unit to determine if the Department is not vulnerable with respect to human rights issues.</p>	<p>Met</p> <p>Accessibility awareness has been promoted to tenants/clients by the department. Accessibility requirements are well known by the clients and tenants. The client departments, tenants and the Client Services Units who deliver and implement accessibility projects for clients/tenants are aware of the TB accessibility policy requirements. The department has issued a number of policies in 1999 on accessibility such as: <i>Accessibility: Duty of Accommodation; Best Practice on Accessibility: Custodian/Client Responsibilities; and Best Practice on Accessibility Exemption Criteria and Approval Process</i></p>
<p>To increase the number of tenants occupying accessible leased space, the RD's Realty Service Branch should ensure that leased facilities that are acquired for the Real Property Branch, through new leases or an exercise of lease options, meet all current accessibility policies and standards.</p>	<p>Met</p> <p>Leasing and Strategic Policy Directorate, OARES, is responsible for establishing policies and guidelines on leasing. Leases contain mandatory clauses on accessibility. Exemptions from accessibility requirements should be documented.</p>

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Recommendation	Measures taken by management
<p>For subsequent leasing activities, the ADMs Real Property and Realty Services should ensure that any new initiatives, standards or policies affecting leased accommodation be communicated to regional leasing officers and implemented immediately.</p>	<p>Met</p> <p>Policies, issues, initiatives are communicated to leasing officers through the Leasing and Strategic Policy Directorate. It is responsible for establishing policies and guidelines on leasing, and preparing lease documentation package. Training is provided to leasing officers.</p>
<p>The ADM, Real Property Branch should ensure that Headquarters and Regional Real Property Branch offices work together to develop a common best practice that explains the application of TB policy on accessibility.</p>	<p>Met</p> <p>Best practices have been issued on Custodian/ Client Responsibilities and Exemption Criteria and Approval Process by OARES.</p>

6 Appendix D - Audit Objectives and Approach

Phase I (2001/2002)

Audit objective

To assess the adequacy of the management controls in place to enable PWGSC to implement the Treasury Board (TB) Real Property Accessibility (RPA) Policy

Audit approach

Obtain and review documentation relating to accessibility including TB Policy; departmental policies; procedures; directives; various reports including annual accessibility report; audit report; on-site evaluation report; statistics on buildings; building management plans; and asset management plans.

Interview key staff within and outside the department involved with the implementation and monitoring of the accessibility policy.

Obtain information on key elements from which controls are established by management to implement and monitor the TB RPA Policy. They include the following:

- Policies, procedures, guidelines, practices, standards;
- Roles, responsibilities and accountabilities;
- Committees;
- Training;
- Departmental matrix structure (horizontal, vertical);
- Project (construction) management process;
- Communication, liaison;
- Budget (Funds);
- Clients/Stakeholders within and outside the department;
- Monitoring mechanism (tools);
- Reporting mechanism (reports); and
- Authorities.

Preparation of a responsibility model of the various parties within the department involved in the implementation of the accessibility policy.

Audit objective

To examine whether the recommendations made in the 1993/94 audit of TB RPA Policy have been successfully implemented.

Audit approach

Obtain appropriate information through interviews and review of documentation to determine measures taken by management to address the 1993/94 recommendations from the audit report.