Canadian
Transportation
Agency

Office
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Accessible Canada Act and Accessible Transportation Planning and Reporting Regulations: A Guide on Feedback Processes

Canadian Transportation Agency

Canada

Table of Contents

Introduction

The purpose of this guide is to explain transportation service providers' (TSPs) obligations under the *Accessible Transportation Planning and Reporting Regulations (ATPRR)* with respect to **feedback processes**. In particular, this guide explains:

- the feedback process requirements for TSPs under the ATPRR and the *Accessible Canada Act* (ACA)
- the requirements for publishing a description of the feedback process
- best practices related to the feedback process

For information on accessibility plans and progress reports, please see:

- *Accessible Canada Act* and *Accessible Transportation Planning and Reporting Regulations*: A Guide on Accessibility Plans
- *Accessible Canada Act* and *Accessible Transportation Planning and Reporting Regulations*: A Guide on Progress Reports

For information on who the ATPRR applies to, classes of entities, and the corresponding publication timelines for each class, please see the guidance on Who does the ATPRR apply to?, and Publication Timelines.

This is not a legal document. The explanations and definitions it provides are for general guidance purposes only. The obligations for accessibility plans are established in the ACA and the ATPRR. In case of differences between this guide and legislation or regulations, the legislation and regulations prevail.

Requirements for feedback process under the ATPRR and the ACA

The ACA requires TSPs to establish a process for receiving and responding to feedback on:

- the implementation of their accessibility plans

- the barriers encountered by persons that deal with the TSP

TSPs must also publish a description of the feedback process that is "simple, clear, and concise", along with the accessibility plan and the progress report, and notify the Canadian Transportation Agency (CTA) within 48 hours of publication of its accessibility plan or progress report.

The CTA emphasizes that this Guide presents examples of minimum requirements and standards that those subject to CTA accessibility-related regulations must meet, and encourages them to strive to exceed standards wherever possible. The references to best practices, examples and sources may also inspire regulated transportation entities to go farther in eliminating barriers to accessibility.

Best practices

TSPs should use short and direct sentences, using simple grammar and avoid the use of technical words, jargon and acronyms. This will help ensure that the description of the feedback process is readable and easily understood by the majority of adult Canadians.

For more information on the feedback process obligations, please see the respective sections below:

- [Designated person to receive feedback](#)
- [How can feedback be submitted to a TSP?](#)

- [Anonymous feedback](#)
- [Acknowledgement of feedback](#)
- [What to do with feedback received](#)
- [Publication of feedback process, including:](#)

    - [Situations where a TSP does not have a public digital platform](#)

    - [Date of publication](#)

    - [Updated feedback process](#)

- [Notice to the Agency](#)
- [Alternate formats, including the form and manner of request and response time](#)

Designated person to receive feedback

TSPs must designate and publicly identify a person who is responsible for receiving feedback on behalf of the entity. Alternatively, TSPs may publicly identify a position (i.e. accessibility officer) whose officeholder is responsible for receiving feedback.

When a TSP publishes its accessibility plan or progress report, the position or the name of the person designated to receive feedback on behalf of the TSP must be included under the "General" heading.

How can feedback be submitted to a TSP?

TSPs must accept feedback that is provided by any means by which the TSP communicates with the public. This must include:

- in person
- by mail
- by telephone
- by email

If a TSP uses other electronic means such as social media platforms or online portals, it must also accept feedback received by those means. Therefore, a TSP must accept and

acknowledge feedback received by Facebook, Twitter, Instagram, and other social media platforms it uses.

A TSP must include details on how a person can submit feedback when publishing a description of its feedback process. These details must be clear, noting all of the required means by which a person can submit feedback listed above, as well as any other means that the TSP uses to communicate with the public.

Best practices

- Details on how a person can submit feedback to a TSP should be clear and easy to find.
- A TSP should establish clear procedures or processes for accepting and acknowledging feedback received through various means, including feedback received in person and through social media activity. A TSP may also want to establish procedures to track social media activity specifically to ensure all feedback is received and acknowledged.

Anonymous feedback

TSPs must accept feedback that is provided anonymously. While TSPs do not need to acknowledge receipt of anonymous feedback, they must report on all feedback received, including feedback received anonymously.

Acknowledgement of feedback

A TSP must acknowledge receipt of feedback received **in the same manner in which it was received**. Therefore, if the feedback was received by email, it must be acknowledged by return email, etc.

TSPs must accept all feedback received and acknowledge it, including feedback received from people who have not travelled with the TSP, persons with disabilities and organizations representing persons with disabilities.

TSPs do not need to acknowledge receipt of anonymous feedback.

What to do with feedback received

While TSPs are required to report on the feedback received through their feedback process and how that feedback was taken into consideration, TSPs have the flexibility to determine how this content is set out and addressed.

It is possible that some TSPs may receive feedback that concerns matters that are outside of the TSP's responsibility. An example of this could be if an air carrier receives a comment regarding the provision of wheelchair services in a foreign airport when the responsibility to provide the wheelchair service falls under the terminal or airport operator and not the carrier.

For more information on progress reports, including information on feedback to be included in a progress report, please see the *Accessible Canada Act* and *Accessible Transportation Planning and Reporting Regulations*: A Guide on Progress Reports.

Publication of feedback process

A TSP must publish a description of its process for receiving feedback in clear, simple and concise language. This means that sentences should be short, grammar should be simple, and technical words, jargon and acronyms should be avoided where possible, such that the text is easily understandable.

A TSP who uses a digital platform must electronically publish the description on the main digital platform that the TSP owns, operates or controls and that it uses to communicate information to the public. In most cases, this will be a TSP's website.

A TSP must publish this information in a manner that makes the description accessible on the digital platform either directly on the homepage or home screen, or by way of a hyperlink from that homepage or home screen.

A TSP must publish the description together with its accessibility plan or progress report, and it must ensure that the description meets the requirements of Level AA conformance that are set out in the Web Content Accessibility Guidelines (WCAG) version 2.0. The ATPRR reference the most recent version of WCAG that has been published in both French and English by the World Wide Web Consortium.

> **Website accessibility**
>
> It is recommended that transportation service providers consult the World Wide Web Consortium's WCAG, which describe how to make Web content accessible to persons with a wide range of disabilities. There are three levels of accessibility (A, AA, and AAA).
>
> Under the ATPRR, TSPs must ensure that the description of its feedback process be accessible to, at minimum, Level AA of the latest version of WCAG that is available in both French and English.

No digital platform

A TSP who does not use a digital platform to communicate information to the public must publish a print copy of the most recent description of its process for receiving feedback. Like descriptions that are published on digital platforms, print copy descriptions must also be published in clear, simple and concise language, together with a TSP's accessibility plan or progress report.

The hard copy publication must be displayed in a conspicuous location in the main reception area of each of its publicly accessible business locations.

Date of publication

A TSP must publish the description of their feedback process **on the same day** that the initial accessibility plan is published. Following this, TSPs must publish the description of their feedback process directly together with the progress report or updated accessibility plan.

Updated feedback process

The feedback process must be published **on the same day** as any of the accessibility plan is published; however, if a TSP updates its feedback process, it must publish an updated description of its process as soon as feasible, in the same manner that is set out above under "Publication of feedback process".

Notice to the Agency

A TSP must notify the CTA by electronic means (e.g., email) within 48 hours of publication of the description of its feedback process, or of an updated description of its feedback process, and include in the notice:

- a hyperlink to the URL of the description or updated description
  OR
- the addresses of the publicly accessible business locations where a print copy of the description or updated description is available

TSPs should use the following email address to submit a notice of publication to the CTA: OTC.REPRTA-ATPRR.CTA@otc-cta.gc.ca.

Alternate formats

A person can request that a TSP make the description of its feedback process available to them in the following alternative formats:

- print
- large print
- braille
- audio format, or
- an electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities

A TSP is expected to make the description of its feedback process available to the person in the alternate format requested **as soon as feasible** after the request is received, **but no later than**:

- for **braille or an audio format:** 45 days after the day that the request is received
- for any other format:

  - for **Class 1 and Class 2 TSPs:** on the 15th day after the day that the request is received, and

  - for **Class 3 TSPs:** on the 20th day after the day that the request is received

Don't forget! – Refer to the guidance on [Who does the ATPRR apply to?](#) for information on classes of entities to confirm which class a regulated transport entity is classified as, and therefore which timelines to respond to alternate format requests apply.

Alternative formats

Large print usually refers to 16 point font and sans serif (for example, Arial or Calibri are both sans serif fonts).

Information provided in an **electronic format** must be compatible with adaptive technology, including software that converts text voice (screen readers) for persons who are blind or have low vision.

Best practices for alternative formats:

- If the type of alternative format needed has not been made clear in the request, it is always best to discuss with the person as to what format is accessible to them. For example, some persons may require 24 point font instead of 16 point font for large print, and other persons may find a plain text or html document reads better with a screen reader than a PDF version.
- For more information on creating accessible documents, you could consult the following resources: the [Digital Accessibility Toolkit](#) and the [Canada.ca Content Style Guide](#).

We're here to help

For more information and guidance about accessible travel and the CTA's dispute resolution services, please contact us at info@otc-cta.gc.ca.

Annex A: Feedback process checklist

The following checklist is intended to assist Transportation Service Providers (TSPs) in meeting the ATPRR requirements related to the feedback process. The items below are set out in the order in which it is suggested that TSPs approach their feedback process in order to meet all requirements.

This is not a legal document. The explanations provided are for general guidance purposes only. The obligations for feedback process are established in the ATPRR and the ACA, and in Annex A of this guide. In case of differences between this guidance material and legislation or regulations, the legislation and regulations prevail.

Step 1: Designate a person or position to receive feedback

☐ Designate a person or position who is responsible for receiving feedback on behalf of the TSP.

☐ Confirm that the position title or the name of the person designated to receive feedback on behalf of the TSP is set out under the "General" heading of the accessibility plan and/or progress report.

Step 2: Establish a feedback process

Confirm there is a mechanism in place to ensure feedback provided by any means by which the TSP communicates with the public is received, including all requests made:

☐ in person

☐ by mail

☐ by telephone

☐ via email

☐ **For TSPs who communicate with the public using other electronic means**, such as social media platforms, confirm there is a mechanism in place to ensure feedback submitted via any other electronic means used to communicate with the public is received.

Anonymous feedback

Don't forget! – TSPs must allow feedback to be provided anonymously.

Acknowledgement of feedback

TSPs must acknowledge receipt of feedback in the same manner it was received. **This does not apply to anonymous feedback.**

Confirm there is a mechanism in place to acknowledge feedback in the same manner in which it was received, including feedback received by:

☐ by mail

☐ by telephone

☐ via email

☐ **For TSPs who communicate with the public using other electronic means**, such as social media platforms, confirm there is a mechanism in place to ensure feedback received via any other electronic means used to communicate with the public is acknowledged.

Step 3: Publishing your feedback process

Before publishing your feedback process, review and confirm:

☐ it is written in clear, simple and concise language.

☐ the document meets the requirements of AA conformance that are set out in the WCAG.

When publishing your feedback process, confirm:

For TSPs who use a digital platform:

☐ Publish the description of your feedback process on the main digital platform, either directly on the homepage or home screen, or by way of a hyperlink from that homepage or home screen.

For TSPs who do not use a digital platform:

☐ Publish a print copy of the most recent description of your feedback process and display it in a conspicuous location in the main reception area of each of your publicly accessible business locations.

Don't forget!

☐ Publish a description of your feedback process together with your accessibility plan or progress report.

☐ **If you update the description of your feedback process**, publish the updated description as set out above for TSPs who use a digital platform or TSPs who do not use a digital platform.

Step 4: Notice to the Agency

☐ **Within 48 hours of publication**, notify the CTA by electronic means that the description of your feedback process, or an updated description of your feedback process, has been published.

TSPs should submit their notice to the CTA using the following email address: OTC.REPRTA-ATPRR.CTA@otc-cta.gc.ca.

☐ Include in the notice a hyperlink to the URL of the description or updated description

OR

the addresses of the publicly accessible business locations where a print copy of the description or updated description is available.

Step 5: Alternate formats

A TSP must provide the description of its feedback process in an alternate format upon request. Please see the *Accessible Canada Act* and *Accessible Transportation Planning and Reporting Regulations*: A Guide on Feedback Processes for additional information on alternate formats, including required response times and best practices.

Should you receive a request, confirm that you are prepared to make the description of your feedback process available in the following formats and on time:

☐ Print (**for class 1 and class 2 TSPs** – on the 15th day after the day that the request is received; **for class 3 TSPs** – on the 20th day after the day that the request is received)

☐ Large print (**for class 1 and class 2 TSPs** – on the 15th day after the day that the request is received; **for class 3 TSPs** – on the 20th day after the day that the request is received)

☐   Braille (45 days after the day that the request is received)

☐   Audio format (45 days after the day that the request is received)

☐   Electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities (**for class 1 and class 2 TSPs** – on the 15th day after the day that the request is received; **for class 3 TSPs** – on the 20th day after the day that the request is received)

A TSP must accept a request for the description of its feedback process in an alternate format made through any means by which the TSP communicates with the public. This includes by mail, by telephone, or via electronic means, such as email.

As applicable, depending on the means by which you communicate with the public, confirm there is a mechanism in place to ensure all requests made:

☐   by mail are met

☐   by telephone are met

☐   via email are met

☐   via any other electronic means used to communicate with the public are met