



Patented Medicine
Prices Review Board
Canada

Conseil d'examen du prix
des médicaments brevetés
Canada

Accessibility Plan for the Patented Medicine Prices Review Board

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General

Contact Information

The person designated to receive feedback on this Plan is the Director of Board Secretariat, Sherri Wilson. Feedback can be submitted through the following channels:

Online portal

<https://www.canada.ca/en/patented-medicine-prices-review/corporate/accessibility/feedback-form.html>

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Information on the feedback process is available at the following link:

<https://www.canada.ca/en/patented-medicine-prices-review/corporate/accessibility/feedback-process.html>

Background

The Patented Medicine Prices Review Board (PMPRB) is an independent, quasi-judicial body with approximately 80 full-time equivalents (FTEs) established by Parliament in 1987 under the *Patent Act* (Act). The PMPRB has a dual regulatory and reporting mandate. Through its regulatory mandate, it ensures that the prices of patented medicines sold in Canada are not excessive. The PMPRB also reports on trends in pharmaceutical sales and pricing for all medicines and on research and development (R&D) spending by patentees.

In addition, at the request of the Minister of Health, pursuant to section 90 of the Act, the PMPRB conducts critical analyses of price, utilization, and cost trends for patented and non-patented prescription medicines under the National Drug Utilization Information System (NPDUIS) initiative. Its reporting mandate provides pharmaceutical payers and policy makers with information to make rational, evidence-based reimbursement and pricing decisions.

[Part 7\(1\)\(a\) of The Accessible Canada Act](#) requires all federal government departments under Schedules I to V of the *Financial Administration Act*, of which the Patented Medicine Prices

Review Board (PMPRB) is part, to have an accessibility plan in place. The deadline for this is December 31, 2022, wherein the departmental plan must be made available on the PMPRB's public facing website and communicated to staff.

Values Statement (Vision and Principles)

The PMPRB is committed to becoming an employer of choice in the public service for those with disabilities and an accessibility leader for work environment and services. This means both implementing the requirements set out in the [Government of Canada's Accessibility Strategy](#) and building on this foundation to cultivate a pro-accessibility culture and operational standards.

The PMPRB is working to be among the top of the federal government's small departments for accessibility. As is the case for most departments, this is the first accessibility plan formally developed for the PMPRB. It aims to incorporate best accessibility practices and to build a work environment that is welcoming and conducive to success for those with disabilities, with leadership that models and reinforces accessibility-positive attitudes and practices.

Guiding Principles

- Employees with disabilities are involved in the design and implementation of the Plan.
- The Plan prioritizes actions that are sustainable and enduring.
- The Plan is developed and implemented transparently and reported on openly.

Definitions

Accessibility: the degree to which a product, service, program, or environment is available to be accessed or used by all.

Accommodation: any change in the working environment (physical workspace, equipment or tools, work hours, leave, etc.) that allows a person with functional limitations in their abilities to do their job. It can be temporary, periodic, or long-term, and is also known as an "adjustment".

Barrier: anything that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation. Barriers can be physical, architectural, technological, or attitudinal.

Disability: any impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment, or a functional limitation, whether permanent, temporary, or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.

Employment

Desired end-state:

A recruitment and hiring system that meets accessibility and accommodation needs at every step of the process and a work environment where employees feel included, empowered, and supported in their careers. PMPRB staff is representative of workforce availability for people with disabilities, including at the executive and managerial levels.

What we have already done:

- Accommodation process instructions added to job poster template.
- Public Service Commission (PSC) guidance materials shared with hiring managers.
- Developed connections and shared practices with other departments related to resources on accessibility.

What we have remaining to do:

- Assess approach to accessibility and accommodation in the hiring process; document findings.
- Action Employment Equity (EE) processes in hiring at hiring manager and HR levels; create clear processes and roles/responsibilities.
- Implement and make available PSC resources for conducting accessible hiring processes (share on Atrium and with managers); make accessible through a roadmap-type guide.
- Provide self-declaration information to employees; make accessible through a roadmap-type guide.
- Implement the Government of Canada Workplace Accessibility Passport for PMPRB employees, once launched; train managers on how to use and set standard for manager and employee to review every six months.
- Implement process to ensure we meet and continue to meet workforce availability/target for employees with disabilities, including recruitment; target needs to be met by 2025 (target is 8.8%; at 8.3% as of 2022).
- Conduct talent mapping exercise for employees with disabilities and identify targets for promotion; include use of sponsorship program.
- Train managers in inclusive staffing and staff management processes.
- Review internal human resources policies and processes in consultation with employees with disabilities to identify how they could be more accessible and inclusive; make necessary changes, if any.

- Examine accommodation processes to increase timeliness and quality of service, and move to an employee-centric approach:
 - Create a guide or standard on accommodations, for both managers and employees, that includes employment (staffing process and onboarding), built environment, technology, and roles and responsibilities, and that ensures documentation required is appropriate to the request.
 - Work to remove administrative barriers from the accommodations process, including documentation required for accommodations.

Built environment

Desired end-state:

An accessible physical workplace environment at the PMPRB, focusing on the office space, where employees are not impeded by barriers and have the information they need to access accommodations.

What we have already done:

- Accessibility buttons on all perimeter PMPRB doors and in hearing facility.
- Elevator and ramp access throughout to increase accessibility for those with mobility issues.
- Refit of office in 2020 and hearing facilities in 2021 met Public Services and Procurement Canada (PSPC) standards for accessibility.
- Created and maintained an ergonomic environment baseline, including sit-stand desks and adjustable chairs for all employees.

What we have remaining to do:

- Consult employees with disabilities on major modifications to built environment and office presence.
- Consider accessibility for in-person events and meetings (location, lighting, noise, air quality, seating, surface hubs, etc.); share resources on best practices.
- Review emergency evacuation plan.

Information and communication technologies

Desired end-state:

Information and communications technology (ICT) that supports accessibility goals and enables employees with disabilities to perform at their best.

What we have already done:

- Equipment allows for mobile work and adaptable set-ups.
- When accommodation requests are raised, we have resources and knowledge in place to respond to them.

What we have remaining to do:

- Review systems, software, websites, and equipment to ensure that they are accessible; where they are not accessible, develop a plan to address shortfalls.
- Provide information on how to make documents accessible; assign roles and responsibilities.
- Review Records and Information Management System (RIMS) solution for accessibility, especially from a cognitive disability perspective.
- Provide training and guidance to enhance accessibility of IM systems.
- Align with new government policy requirements for accessibility in ICT under Policy on Service and Digital.

Communication, other than ICT

Desired end-state:

Internal and external communication is barrier-free and supports awareness of accessibility in the workplace. The environment is stigma-free and welcomes conversations around accessibility. Employees with disabilities are consulted on any and all changes made within the organization.

What we have already done:

- No relevant actions undertaken to date.

What we have remaining to do:

- Build awareness of accessibility practices.
- Work to reduce stigma around self-declaring.
- Encourage frequent conversations and check-ins between managers and employees about accessibility options.
- Consult employees with disabilities when taking major initiatives.
- Promote awareness of government disability networks.

Procurement of goods, services, and facilities

Desired end-state:

Goods, services, and facilities procured by the PMPRB are accessible and usable by everyone.

What we have already done:

- Implement procurement checklist for accessible goods and services.

What we have remaining to do:

- Ensure standards and requirements from Public Services and Procurement Canada (PSPC) and Shared Services Canada (SSC) are met.

Design and delivery of programs and services

Desired end-state:

The PMPRB is equipped to design and deliver programs and services that are easily accessible to persons with disabilities, and stakeholders are satisfied with the accessibility of our programs and services.

What we have already done:

- All published reports are in an accessible format.
- The sections of the PMPRB website that have been transitioned to Canada.ca are accessible.

What we have remaining to do:

- Legacy public-facing site is not fully accessible; finish transition to Canada.ca.
- Assess accessibility of media requests; document findings and implement necessary changes, if any.
- Assess accessibility of portal, forms, and documents used for patentees; document findings and implement necessary changes, if any.
- Assess accessibility of Access to Information and Privacy (ATIP) request process (e.g. format of output for client); document findings and implement necessary changes, if any.
- Assess accessibility of webinars and presentations to external audiences (e.g. software, webinar decks provided to audiences, cost and set-up requirements); document findings and implement necessary changes, if any.
- Assess accessibility of hearing processes; document findings and implement necessary changes, if any.

Transportation

As the PMPRB does not own or manage transportation vehicles, this area is not applicable. Transportation services procured for employee travel are in accordance with the National Joint Council Travel Directive.

Culture

Desired end-state:

The culture at the PMPRB is inclusive to those with disabilities and operations and social environment are conducive to success. PMPRB management approach reflects an accessibility-by-default reflex.

What we have already done:

- Leadership is supportive and receptive to making accessibility changes; public commitment to wellness as an organization.
- Identified all-staff training opportunity related to accessibility (INC115).
- Developed Performance Management Agreement (PMA) objective for managers and executives regarding people management, including accessibility.

What we have remaining to do:

- Model and reinforce accessibility-positive attitudes and practices at the leadership level.
- Appoint a PMPRB accessibility coordinator who has lived experience with disability.
- Implement PMA objective for managers and executives regarding people management, including accessibility.
- Add accessibility to the Workplace Improvement Team (WIT) mandate to integrate inclusive and culture-shifting initiatives; include employees with disabilities.
- Implement some best management practices related to accessibility in everyday work.

Consultations

Survey Results

A survey was conducted with PMPRB employees in October/November 2022 seeking feedback on accessibility within the work environment. The survey garnered 39 responses (approximately 50% of staff), including 11 managers. One respondent had self-declared at the PMPRB, while a total of five identified as persons with disabilities and another three were unsure if they identified as such.

- Only 38% of respondents were aware of the process to self-declare at the PMPRB. This share dropped to 25% for employees who identified as persons with a disability or were unsure.
- None of the employees who identified as persons with a disability or were unsure responded that they had access to a disability network within the public service.
- Most employees said they would feel comfortable talking to their manager about their accessibility needs; just four said they would not be comfortable or were unsure.
- The majority of employees indicated that they either did not consider accessibility needs of their colleagues, or were unsure how to do so, when booking meetings, sharing documents, planning social events, etc.
- Of the managers who responded, only 36% said they knew the process to get an accommodation for an employee and what to ask the employee to support the accommodation.
- Approximately a quarter of respondents indicated that they had encountered barriers at the PMPRB office, or were unsure whether they had. For employees who identified as persons with a disability or unsure, this number increased to 50%.
- In terms of the information technology hardware and software used at the PMPRB, 97% of employees were satisfied with their accessibility.
- 39% of respondents said they would not know who to contact at the PMPRB to seek an accommodation.
- Just over half of respondents said that they were not asked for accommodation needs during the onboarding process when they were hired, and an additional 38% said they were unsure whether or not they had been asked.

When asked for additional feedback, we heard a need for the following:

- Flexibility in accommodation or accessibility issues;
- “One-stop shop” or point person for accommodations/accessibility;
- Accessible-by-default for things like document sharing;
- Centralized, well-communicated accessibility plan and guidance documents;
- Socializing disability and accessibility within the organization/organizational culture;
- Guest speakers on accessibility and mental health, especially within the public service;
- Better onboarding process.

Additional Input

In addition to surveying staff, the working group on the Accessibility Plan made the following observations:

- One of the difficulties with the Government of Canada is what you need to have to prove a disability. If you need documentation from the medical system, especially given how overwhelmed they are, you may be out of luck. You may not be able to get a diagnosis to support an accommodation.
- Onus is always on the employee to protect themselves. It should be on the manager at the very beginning of the staffing process and thereafter to ensure needs are met. Need it to be easy for the conversation regarding accommodation to occur.
- Cost of equipment/accommodating, though potentially high upfront, are low when amortized over a full career and equipment/accommodations should follow employee as a passport.
- Would be helpful to have a guide or standard on how to access accommodations.
- Disabilities are not static. They develop over time. As a result, accommodations are not static either.
- Ask the employee for the solution rather than assuming.
- Managers need to know what their resources and options are (e.g., Shared Services Canada [SSC] hardware/software support).
- Invisible disabilities are not treated equally with visible disabilities; they need to be. For example, autism spectrum disorders or attention-deficit/hyperactivity disorder (ADHD) can prevent employees from taking the standard bureaucratic steps to get the accommodations they need.
- Managers should ask employees how they want to be managed (e.g., what style of communication works best for you?) and work to remove barriers rather than imposing solutions.
- Internal services (like HR and IT) do not always consider or ask for accommodation needs when booking services. Likewise, hiring process often requires accommodation requests to be made again and again; some candidates would prefer to have the conversation with the hiring manager rather than with the HR assistant.
- Government channels to access accommodations often mean long wait times.
- Hearing processes are not as accessible as they should be.