



Patented Medicine
Prices Review Board
Canada

Conseil d'examen du prix
des médicaments brevetés
Canada

Accessibility Plan for the Patented Medicine Prices Review Board Progress Report

December 2023

Canada 

ISSN 2817-8793

Catalogue number: H79-18E-PDF

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General

Contact Information

The person designated to receive feedback on this Plan is the Senior Director of Corporate Services, Devon Menard. 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) published and shared its first [Accessibility Plan](#) in December 2022, in compliance with [Part 7\(1\)\(a\) of The Accessible Canada Act](#). The Accessibility Plan identified actions the PMPRB is undertaking to create a work environment that is welcoming and conducive to success for those with disabilities. These actions aim towards a pro-accessibility culture and operational standards, as well as leadership that models and reinforces accessibility-positive attitudes and practices. The PMPRB also committed to consulting with employees with disabilities, ensuring that actions taken were enduring and sustainable, and acting transparently and with accountability throughout the plan's implementation.

The launch of the Accessibility Plan was communicated to staff and has been integrated into the operational planning process for the organization to ensure that each action item is assessed and gaps are identified early in the implementation. This progress report takes stock

of the actions taken thus far, assesses the approach towards implementation, and identifies lessons learned from the process, as well as next steps.

In the past year, the PMPRB has identified an important gap in capacity in reaching its accessibility goals. Due in part to the small size of the organization, those responsible for implementing the Accessibility Plan were faced with conflicting priorities and, as a result, less progress was made on the action items than was intended for 2023.

To resolve this, a dedicated resource will be assigned to the implementation of the Accessibility Plan in January 2024. This employee will be tasked with prioritizing action items, reconvening an accessibility working group, consulting with employees with disabilities, and monitoring and moving forward on the steps identified in the Accessibility Plan. They will also be able to give dedicated attention to identifying any gaps or additional barriers and the steps needed to make improvements in these areas.

About the PMPRB

The 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.

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.
- Implemented the Government of Canada Workplace Accessibility Passport for PMPRB employees

What is in progress:

- 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 intranet and with managers); make accessible through a roadmap-type guide.
- Provide self-declaration information to employees; make accessible through a roadmap-type guide. [Pending Treasury Board Secretariat release of new self-identification form.]

What we have remaining to do:

- Assess approach to accessibility and accommodation in the hiring process; document findings.
- Train managers on how to use Government of Canada Workplace Accessibility Passport and set standard for manager and employee to review every six months.
- Implement process to ensure we meet and continue to meet workforce availability (WFA) target for employees with disabilities by 2025, including recruitment. [As of November 2023, WFA is 7.8% and PMPRB representation is 6.7%.]
- 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 is in progress:

- Review emergency evacuation plan.

What we have remaining to do:

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

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.

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 completed to date.

What is in progress:

- Build awareness of accessibility practices.
[Accessibility Hub with resources for employees currently under development.]
- Consult employees with disabilities when taking major initiatives.

What we have remaining to do:

- Promote awareness of self-declaration process.

- Encourage frequent conversations and check-ins between managers and employees about accessibility options.
- 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 PSPC and 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 is in progress:

- Legacy public-facing site is not fully accessible; finish transition to Canada.ca.
- 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.

What we have remaining to do:

- 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.

- 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.

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.
- Appointed a PMPRB accessibility coordinator who has lived experience with disability.
- Implemented PMA objective for managers and executives regarding people management, including accessibility.

What is in progress:

- Model and reinforce accessibility-positive attitudes and practices at the leadership level.
- Work to reduce stigma around self-declaring.
- Assign a dedicated resource to the implementation of the Accessibility Plan.
[This new action item replaces a former item that assigned accessibility initiatives to the internal Workplace Improvement Team (WIT). As the WIT is an employee-led group, the decision was made to formalize these responsibilities into the organizational structure instead.]

What we have remaining to do:

- Consider accessibility factors for staff events.
- Implement best management practices related to accessibility in everyday work.

Consultations

A staff survey was conducted across PMPRB employees in October/November 2022 to inform the development of the Accessibility Plan. For the purposes of this progress report, consultation was limited to collaboration and review with the recently appointed Accessibility Coordinator.

As a dedicated resource is being assigned to the implementation of the Accessibility Plan in January 2024, future progress reports will be informed by more frequent collaboration with the accessibility working group and more thorough consultation with employees with disabilities. These planned consultations will focus on assessing whether the approach to accessibility at the PMPRB meets the intended goals, whether actions taken thus far have been effectively implemented, whether there are gaps or additional barriers that need to be addressed, and whether these steps are being adequately communicated to staff.

Feedback

No feedback was received on the PMPRB's Accessibility Plan through the specified channels. Opportunities for feedback will be promoted to staff as part of the release of the progress report to ensure any input and concerns from staff are heard and addressed.