

Military Police Complaints Commission of Canada

Commission d'examen des plaintes concernant la police militaire du Canada

MILITARY POLICE COMPLAINTS COMMISSION OF CANADA

Multi-Year Accessibility Plan Progress Report

January 1, 2024, to December 31, 2024



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MILITARY POLICE COMPLAINTS COMMISSION OF CANADA

Message from the Chairperson

I am pleased to present the Military Police Complaints Commission's (MPCC) second Accessibility Action Plan Progress Report. This report provides updates on the MPCC's advancement in implementing improvements as identified in the *Accessible Canada Act* and ensuring that it remains barrier-free and a leader in accessibility.

As a small administrative tribunal, the MPCC has long held that requests for accommodation from people with disabilities must be accommodated. This applies to employees and the public it serves. It is a core tenet for fair and unfettered access to administrative justice and for access to a safe workplace. Over the years, the MPCC has made changes to its physical workspace to accommodate people with disabilities, including transforming its office space into an accessible workspace and replacing push button door openers with a touchless system. It has remained flexible and open in how it receives complaints against the military police, and how it communicates with the people it serves.

The goals we have set for ourselves in our <u>Multi-Year Accessibility Plan</u> allow us to proactively monitor and make improvements in each of the priority areas identified in the *Accessible Canada Act*, namely employment, built environment, information and communication technologies, other communications, the procurement of goods and services and the design and delivery of programs and services.

While the MPCC currently surpasses the Government of Canada's 2025 target of 7% of its employees identifying as persons with disabilities, with 16% of staff identifying as persons with disabilities, we know there is still more that could be done. In the coming years, we remain committed to continuing to strengthen our internal processes, while striving to become more inclusive and accessible to the benefit of those we serve. We remain steadfast in using an approach that is trauma-informed, incorporating GBA+ principles, and viewing our work through an equity, diversity and inclusion lens.

I look forward to working with our partners in the Government of Canada to ensure that the important goals of the *Accessible Canada Act* are met. We warmly welcome all feedback and comments on this progress report and the steps we have taken to increase accessibility for all.

Original signed by

Me Tammy Tremblay, MSM, CD, LL.M Chairperson

General

The Military Police Complaints Commission of Canada (MPCC) is a civilian, quasi-judicial oversight agency that operates at arm's length from the Government of Canada. The MPCC derives its mandate from Part IV of Canada's *National Defence Act* (NDA). While it reports to Parliament through the Minister of National Defence, the MPCC is both administratively and legally independent from the Department of National Defence and the Canadian Armed Forces. The MPCC is formally part of the Core Public Administration under the Institution Schedule I.1 and of the HR Schedule IV of the <u>Financial Administration Act</u> (FAA).

The MPCC regularly monitors and evaluates feedback concerning accessibility and ensures that it is incorporated into its plans when possible. Please reference <u>Annex A: Feedback process at the Military</u> <u>Police Complaints Commission of Canada</u> for more information on our feedback process.

Contact us

Contact the Senior Director, Corporate Services to:

- provide feedback or ask questions
- request the accessibility plan in an alternative format.
- request descriptions of the MPCC's feedback process in an alternative format

By mail

Military Police Complaints Commission of Canada Attention: Senior Director, Corporate Services 270 Albert Street, 10th Floor Ottawa, ON, K1P 5G8

By phone

- Toll-free: 1-800-632-0566
- Local: 613-947-5625

Operating hours are Monday to Friday from 8 a.m. to 4 p.m. ET, excluding statutory holidays.

By email: reception@mpcc-cppm.gc.ca

Feedback can be submitted either with an identified contact or anonymously. We will acknowledge the receipt of all accessibility feedback by the same means it is received unless the feedback is received anonymously.

Alternate formats

The following formats may be available:

• Large print (larger, clearer font)

- Braille (a system of raised dots that blind or visually impaired people can read with their fingers)
- Audio format (recording of someone reading the text aloud)
- Electronic formats compatible with adapted technology

Accessibility Statement

The Military Police Complaints Commission strives to be an organization that exhibits fairness and impartiality, inspires trust, and contributes to a climate of confidence in military policing. The MPCC strives to be barrier-free, accessible and inclusive to all and is committed to providing accessible and inclusive services for all employees, clients, complainants, subjects and other stakeholders. The MPCC will review and develop its programs, policies, directives and services with the intent to continually improve.

Multi-Year Accessibility Plan Progress Report

Progress

The Military Police Complaints' Commission's (MPCC) three-year <u>Accessibility Report</u> was prepared in consultation with a third-party consultation firm, and with the input of subject matter experts within the MPCC, external stakeholders and people with disabilities. The MPCC is a small agency with approximately 32 full-time employees and three part-time members. The implementation of its Accessibility Report is done in accordance with its resources and needs. As of November 2024, 16% of the MPCC's employees identified as a person with a disability.

To attain the goals of the *Accessible Canada Act*, the MPCC began its progress on proactively identifying, removing, and preventing barriers in six (6) of the seven (7) priority areas:

- employment.
- the built environment (buildings and public spaces).
- information and communication technologies.
- communication, other than information and communication technologies.
- the procurement of goods, services and facilities.
- the design and delivery of programs and services; and
- transportation (airlines, as well as rail, road and marine transportation providers that cross provincial or international borders)¹.

Employment

The MPCC is dedicated to implementing government-wide initiatives and increasing representation of persons with disabilities across all occupational groups and levels. As such, the MPCC is committed to removing and preventing barriers to recruitment, retention, and the promotion of persons with disabilities. The MPCC's Human Resources recruitment continues to actively offer accommodation throughout the assessment phases, up to and including the letter of offer. Once hired, employees who subsequently identify a need for accommodations can submit a request to their manager who in turn will reach out to the various members of the corporate services team for action. Various other measures are in place to support people with disabilities in helping ensure their full participation in the workplace. Some examples:

- Emergency protocols for floor evacuations at the MPCC include consideration for employees with disabilities.
- All documents posted on the website are accessible.

¹ This item does not apply to the MPCC

- Alternative formats and communication supports are provided when requested by a user or employee.
- The development of policies and procedures are made in consideration of accessibility, GBA+ and equity, diversity and inclusion practices.
- Where operationally feasible, the MPCC continues to facilitate telework and flexible work arrangements to accommodate the needs of all employees.

Goal

Continued efforts should be made to increase MPCC employee's awareness about accessibility upon appointment and thereafter, so they are aware of their rights to accommodation.

Action	Target Timeline	Status
Review and determine general training/information sessions, tools, or communication strategy to increase employees' and managers' awareness and knowledge on accessibility.	2023	To revise its Learning Directive, the MPCC undertook a comprehensive review of training practices in collaboration with other departments to identify and implement best practices and increase employees' awareness in the areas of accessibility, equity, diversity and inclusion. The organization also sought feedback from employees to better understand their learning needs and identify any obstacles to their learning. The analysis of data and update process was finalized in 2024. The organization Learning Directive was reviewed and approved by the Executive Committee in July 2024. As a result, the Canada School of Public Service course entitled "Addressing Disability Inclusion and Barriers to Accessibility (INC115)" is now mandatory for all employees. Employees received the updated list of mandatory training courses as part of the mid- year performance review exercise in September 2024. In addition, the Human Resources (HR) department uses Microsoft Teams as a tool to share resources with employees on accessibility; mental health; and equity, diversity and inclusion.
Adopt the <u>GC Workplace</u> <u>Accessibility Passport</u> which is a tool for public service employees and	2023	The MPCC implemented the GC Workplace Accessibility Passport in 2024.

applicants to document and support measures and tools they need to succeed in the workplace.		Employee awareness messages were issued towards the end of 2024 and will continue throughout 2025.
Review and determine targeted training to employees who are tasked to draft / publish public documents to ensure that these meet the accessibility standards for communication.	2023-2024	This action item is ongoing. The HR department regularly explores and researches relevant training options for employees and seeks out appropriate learning opportunities for those in need of it. HR reviews and revises job descriptions systematically to ensure they are inclusive for people with disabilities creating a workplace that is welcoming to all candidates.

Additional goals and targeted actions:

- While the MPCC currently exceeds the Government of Canada target employment rate for people with disabilities, it strives to support the government-wide initiative to increase representation across the Public Service. As such, the MPCC targets and considers hiring people with disabilities when it conducts hiring processes, to advance the overall Government of Canada strategy.
- The MPCC continues to offer ergonomic assessments and does not require medical certificates to support employees who require it.

Built Environment

The MPCC continues to pursue an accessible built environment. As such, the MPCC works with employees, building owners, and Public Services and Procurement Canada (PSPC) to achieve the highest level of accessibility in the current office space. The office of the MPCC is in downtown Ottawa, in a building owned by a private company, where government space is leased by PSPC. The MPCC is one of many tenants that share some of the common areas, such as the entrance to the building, lobby area, elevators, washroom facilities and parking. The building includes a wheelchair ramp and power door operators at the entrance. Power operated doors are also available at the MPCC office entrances and at the washroom entrances. Washrooms include an accessible stall. MPCC workstations are equipped with power sit/stand desks and ergonomic office chairs allowing an accessible desk set-up to respond to employee accommodations.

Goals

There are no identified barriers under MPCC's responsibility.

Action	Target Timeline	Progress
An external subject matter	2023	In 2023, the MPCC enquired with PSPC to have
expert (SME) will be engaged		a subject matter expert provide

to provide recommendations to continuously improve office		recommendations for the continuous improvement of the MPCC's physical offices
accessibility.		located in downtown Ottawa. Unfortunately, PSPC informed MPCC that it was unable to conduct an accessibility review at the time. PSPC will guide the MPCC on developing recommendations for specific improvements when new projects are established. The Health and Safety Committee has conducted monthly inspections of our premises to detect and address any health and safety concerns, including accessibility. We will continue to monitor and resolve any problems that may arise.
		Based on feedback, the MPCC reconfigured one of its boardrooms to address accessibility issues for persons with reduced mobility.
We will use the inclusive design checklist for accessibility considerations (including design, safety, ergonomics, and signage).	2023	The MPCC is reviewing a Disability Consideration Checklist, which is available for federal departments, to aid in identifying accessibility consideration on an ongoing basis.

Information and Communication Technologies (ICT)

The MPCC webpage is a sub-page of the Government of Canada structure. The pages are templated and follow a specified guideline. The MPCC does not have an intranet page.

Goals

Content added to the webpage must be accessible and the MPCC must increase its internal expertise and capacity in creating accessible documents.

Action	Target Timeline	Progress
Ensure all content posted to the webpage is compliant with Web Content Accessibility Guidelines (WCAG) requirements.	2023-2024	All elements on our website complies with the Web Content Accessibility Guidelines (WCAG) 2.0. Our webmaster routinely examines the content of our external site to guarantee ongoing conformity with these guidelines. To align with the government's goal of creating an inclusive and barrier-free nation, we are committed to implementing the <u>Accessibility</u> <u>requirements</u> for ICT products and services standard.
Review systems, software, and equipment to ensure that they are accessible. Where they are not accessible, the MPCC will develop a plan to remediate the accessibility shortfalls.	2025	 The MPCC has conducted a thorough review of its IT infrastructure, ensuring that all systems, software, hardware, and cellular equipment are fully accessible. Accessibility features are available for individuals with varying abilities, including those who are blind or have low vision, colour blindness, hearing impairments, limited vocal capabilities, dexterity or strength issues, and limited reach. The organization assesses and responds to all accommodation requests, including those for special hardware and specialized software. The organization regularly examines its technological infrastructure, including software and hardware, to guarantee its usability by: Ensuring that accessibility features are enabled for their IT solutions and equipment. Utilizing enterprise tools and resources to ensure that internal-facing IT solutions and equipment are accessible to public servants. Collaborating with Shared Service Canada and its Accessibility, Accommodation and Adaptive
		Computer Technology (AAACT) Program to discover and implement accessible resources and technology and eliminating any remaining IT accessibility obstacles.

		 Customizing our internal accessibility initiatives to align with the government's accessibility standards Employing open-source software to support others to develop accessible common IT systems across all departments.
		Finally, in November, a conference room solution was approved by the Executive Committee that will eliminate the complexity of joining a MS Teams meeting in the main conference room. A simplified tap and join console was purchased to help reduce accessibility shortfalls.
Ensure that accessibility considerations are included in the MPCC ICT plan.	2025	The MPCC is updating its IT Asset Management and Planning Policy to ensure that accessibility considerations are included during the review of its infrastructure modernization needs. The network account form has also been reviewed and now contains a section for disability requirements, ensuring that accessibility factors are addressed during the employee onboarding process.

Communications other than ICT

The MPCC is dedicated to ensuring all its internal and external communications are accessible. This includes ensuring that MPCC communications are written in plain and accessible language.

Goals

1. Develop formal processes to provide alternative formats and communication supports in a timely matter, upon request by a user or employee.

2. Reduce the technical and/or sector specific language used in public-facing reports and documents.

Action	Target Timeline	Progress
Develop an internal process	2024	The MPCC sends and receives information via
and information on providing		email, mail, E-post, or is available to be picked

alternative formats and communication supports.		up at the MPCC office at the request of the party. As part of the process to make information more accessible, the MPCC is using plain language and incorporating graphs and figures for its 2024 Annual Report. Additionally, the MPCC will explore the development of an accessible PDF version of the report for our website.
Identify and adopt standards for public-facing communications to be in plain language.	2024	The MPCC is committed to using clear and straightforward language in our corporate documents and decisions. We have also invested in training sessions to help us improve our skills. In 2025, we aim to further refine our approach, making sure that our communications effectively reach and benefit every Canadian.
Evaluate current public-facing documents for clarity and plain language and provide plain language versions where necessary.	2024	The MPCC has reviewed the sections and documents on its website to ensure the information is accessible, clear, user-friendly, and bilingual. Identified improvements will be implemented in 2025.

Additional Goals:

- The MPCC will promote accessible and inclusive internal and external communications practices in compliance with the latest Web Content Accessibility Guidelines (WCAG).
- IT will review the MPCC website to ensure that it meets Web Content Accessibility Guidelines (WCAG) 2.1 (2018) (including: no red/green colours, which are difficult for those with colour blindness; increase contrast between colours in bar graphs; avoiding split/merged cells in tables).

The Procurement of Goods, Services and Facilities

PSPC is a key partner in achieving accessibility at the MPCC. As such, the MPCC will implement procurement principles, rules, and practices with the goal of advancing accessibility objectives.

Goals

Provide external consultants (investigators and others) accessibility-related training prior to being contracted and interacting with MPCC employees and clients.

Action	Target Timeline	Progress
Provide accessibility training as needed to contractors and investigators as needed.	2023	All investigative services contracts now include General Conditions which focus on Accessibility, and which automatically encompass accessibility requirements.

The design and delivery of programs and services

As an organization that offers services to members of the public, the Military Police, the Canadian Armed Forces and to other stakeholders, the MPCC must consider accessibility in the delivery of our programs and services. A fundamental aspect in achieving this is through feedback and by implementing meaningful accessibility improvements.

Goals

No barriers were identified at this time.

Action	Target Timeline	Progress
Establish processes to provide complainants, subjects, and other stakeholders with alternate formats of their Final Reports which includes the MPCC Findings and Recommendations when requested.	2024	The MPCC sends and receives information via email, mail, E- post, or makes it available to be picked up at the MPCC office at the request of the party. As part of the process to make information more accessible, the MPCC is using plain language and incorporating graphs and figures for its 2024 Annual Report. Additionally, the MPCC will explore the development of an accessible PDF version for our website.
Conduct additional external survey with our clients to assess	2025	To be addressed in early 2025

the surrout state of economicality		The Evenutive Committee has
the current state of accessibility		The Executive Committee has
with respect to the delivery of		decided not to survey external
our programs and services.		clients and will instead focus on
		internal employees with the
		Public Service Employee Survey
		2024 (PSES). This survey
		includes broader questions that
		will offer the MPCC a better
		understanding of our
		employees' perspectives on
		various topics, including
		accommodation and barriers.
When applicable, consult with	Ongoing	The consultation has been
people with disabilities prior to		postponed to 2025 to focus on
new policies and procedures to		the 2024 Public Service
be implemented.		Employee Survey.
Adopt standards for public-	2024	The MPCC is committed to using
facing communications to be in		clear and straightforward
plain language.		language in our corporate
		documents and decisions. We
		have also invested in training
		sessions to help us improve our
		skills. In 2025, we aim to further
		refine our approach, making
		sure that our communications
		effectively reach and benefit
		every Canadian.
		,

Transportation

This priority area under the Act is not applicable to the MPCC.

Consultations

The MPCC's three-year plan was prepared with the help of an external consultant by first completing an environmental scan to ensure understanding of "central agencies" and other government departments' accessibility initiatives, and to review existing related policies and procedures. The exercise helped identify existing practices and initiatives that could be adopted as best practices across the organization. Consultations were conducted in three parts:

- Subject matter experts at the MPCC were consulted in facilitated focus groups with their knowledge of employment practices, procurement, facilities, digital resources, communications, and the design and delivery of good and services. Questions regarding accessibility barriers, current accommodation practices, and priorities for remediation were discussed and responses have been used to inform this plan.
- 2. **External Stakeholders**, including military family members, law firms and other stakeholders were invited to respond to a survey question about access to services, information and resources as well as accessibility barriers.
- 3. Accessible Canada Act Review Committee: The MPCC Accessibility Plan was also reviewed by the consultation firm's standing Accessible Canada Act Review Committee. Consultation Group members are individuals with lived experience with disabilities, and knowledge of accessibility issues.

Feedback

Employees and members of the public are encouraged to share their feedback, anonymously or otherwise, about our Accessibility Action Plan, barriers experienced, or any matter related to accessibility. Individuals can consult the Accessibility Feedback Process (Annex A) for other ways to provide feedback and how we use the feedback we receive.

In 2024, the MPCC received the following requests for assistance due to the accessibility of a document, a service or workplace:

- A request to receive the MPCC complaint form by mail as the caller was having issues with opening the form in an electronic format. The MPCC agreed with the request, and the document was sent by mail.
- A request to file a complaint with the MPCC by contacting a registry officer by telephone. The MPCC agreed with the request and made an officer available to take the complaint over the phone. However, the applicant did not follow up with the MPCC officer.
- Requests from some employee to reduce the brightness of certain workspaces. The MPCC modified the lighting in one workspace and purchased dimmable lamps for certain offices.
- An employee with a hearing impairment requested that speakers be installed in her workspace. The MPCC accepted the request and installed speakers in her workspace.

GLOSSARY

Accessibility:

The degree to which a product, service, program, or environment is available to be used or accessed easily by persons with and without disabilities. Improving accessibility helps everyone participate fully and equally in society and realize their full potential.

Accommodation (adjustment):

Any change in the working environment that allows a person with functional limitations in their abilities to do their job. Changes can include:

- adjustments to the physical workspace
- adaptations to the equipment or tools
- flexible work hours or job-sharing
- relocation of the workspace within the greater workplace
- the ability to work from home
- reallocation or exchange of some non-essential tasks for others
- time off for medical appointments

Accommodations (adjustments) can be temporary, periodic, or long-term, depending on the employee's situation or changes in the workplace.

Barrier

According to the Accessible Canada Act the definition "means anything—including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice—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."

Disability

According to the <u>Accessible Canada Act</u>, the definition "means 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."

ICT (information and Communication Technology)

"An extensional term for information technology (IT) that stresses the role of unified communications and the integration of telecommunications (telephone lines and wireless signals) and computers, as well as necessary enterprise software, middleware, storage and audiovisual, that enable users to access, store, transmit, understand and manipulate information."

Persons with disabilities

Persons who have a long-term or recurring physical, mental, sensory, psychiatric, or learning impairment and who a) consider themselves to be disadvantaged in employment by reason of that impairment, or b) believe that an employer or potential employer is likely to consider them to be disadvantaged in employment by reason of that impairment.

Persons with disabilities include persons whose functional limitations owing to their impairment have been accommodated in their current job or workplace.

Web Content Accessibility Guideline (WCAG)

The WCAG documents explain how to make web content more accessible to people with disabilities. Web "content" generally refers to the information in a web page or web application, including:

- natural information such as text, images, and sounds
- code or markup that defines structure, presentation, etc."

The Web Content Accessibility Guidelines (WCAG) are part of a series of web accessibility guidelines published by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C), the main international standards organization for the Internet. They are a set of recommendations for making Web content more accessible, primarily for people with disabilities.

Annex A

Feedback process at the Military Police Complaints Commission of Canada

The feedback received will be acknowledged by the Senior Director, Corporate Services, within five (5) business days, by the means of which we received the information:

- If we receive the information by mail, we will write back and send the communication by mail to the contributor of the feedback.
- If we receive a telephone call, we will return the telephone call to the contributor of the feedback, to acknowledge the voicemail and we will gather the feedback in a conversation. We will ask the contributor of the feedback for an email address or a mailing address to confirm that the information transmitted during the telephone conversation was understood and accurate.
- If we receive an email to the <u>Reception@mpcc-cppm.gc.ca</u>, the email will be sent to the Senior Director, Corporate Services, as the contact person for the MPCC, and an email of acknowledgement will be sent.
- If we receive feedback on our social media, we will respond on the same social media platform in a private message or if not possible, directly reply to the contributor from the message where the feedback was noted.
- If we receive feedback anonymously, a receipt of acknowledgement will not be issued.

The MPCC will also review the feedback and assess how the MPCC can improve its accessibility from the feedback received, wherever possible.

Furthermore, all feedback will be retained in our record data management system and referenced in that year's progress report. We do not identify individuals in our reports.

Annex B

MPCC's accessibility action plan at a glance

Action	Timeline (Calendar year)
Employment	
Review and determine general training/information sessions, tools, or communication strategy to increase employees' and managers' awareness and knowledge on accessibility.	2023
Adopt the GC Workplace Accessibility Passport which is a tool for public service employees and applicants to document and support measures and tools they need to succeed in the workplace.	2023
Review and determine targeted training to employees who are tasked to draft / publish public documents to ensure that these meet the accessibility standards for communication.	2023-2024 (based on availability of training)
Built Environment	
An external subject matter expert will be engaged to provide recommendations to continuously improve office accessibility.	2023
We will use the inclusive design checklist for accessibility considerations (including design, safety, ergonomics, and signage).	2023
Information and Communication Technologies (ICT)	
Ensure all content posted to the webpage is compliant to Web Content Accessibility Guidelines (WCAG) requirements.	2023-2024
Review systems, software, and equipment to ensure that they are accessible. Where they are not accessible, the MPCC will develop a plan to remediate the accessibility shortfalls.	Begin in 2023 and complete by 2025
Ensure that accessibility considerations are included in the MPCC ICT plan.	Begin in 2023 and complete by 2025
Communications other than ICT	
Develop an internal process and information on providing alternative formats and communicative supports.	2024
Identify and adopt standards for public-facing communications to be in plain language.	2024

Evaluate current public-facing documents for clarity and plain language and provide plain language versions where necessary.	2024
The Procurement of Goods, Services and Facilities	
Provide accessibility training as needed to contractors and investigators as needed.	2023
The design and delivery of programs and services	
Establish processes to provide complainants, subjects, and other stakeholders with alternate formats of their Final Reports which includes the MPCC Findings and Recommendations when requested.	2024
Conduct additional external survey with our clients to assess the current state of accessibility with respect to the delivery of our programs and services.	2025
When applicable, consult with people with disabilities prior to new policies and procedures to be implemented.	When applicable
Adopt standards for public-facing communications to be in plain language.	2024