

Accessibility Advisory Committee Letter of Recommendations



Dear members of Edmonton City Council,

**RE: Accessibility Advisory Committee’s Support of Recommendations from the Pivotal Research Report: “Accessible Vehicles For Hire Programs Needs Assessment”**

The Accessibility Advisory Committee (AAC) provides advice and recommendations to Edmonton City Council about facilities and other infrastructure, as well as programs, services, activities, and policies; with the aim of removing barriers for all Edmontonians.

The AAC reviewed the City commissioned report prepared by Pivotal Research Inc, entitled “Accessible Vehicles For Hire Programs Needs Assessment”, dated September 24, 2021, which reviewed the service gaps and user concerns of accessible taxis.

One of our ongoing concerns is ensuring individuals with disabilities have equitable access to transportation. In the past, we have consulted with DATS, ETS, Vehicle For Hire, industry and academics on a variety of topics related to accessible transportation. The AAC suggested improving accessible taxi service 9 years ago, in 2013; specifically, as a response to alleviate the heavy demand on DATS, this concern was raised again in 2016, 2018 and 2020 with Vehicle for Hire. In 2019 the AAC conducted a jurisdictional scan and presented a report to council Accessible Taxi Report CR 7224. Our key recommendations at that time are the same recommendations stated in this Pivotal Research report.

The AAC, in conjunction with the Women’s Advocacy Voice of Edmonton (WAVE), the Anti-racism Advisory Committee (ARAC), and the policy subcommittee of the Edmonton Youth Council (CEYC) are concerned about the length of time it is taking the City to implement important equitable and safety service improvements. United, we support the Pivotal Research Report’s key considerations and recommendations to address critical programmatic, policy, and operational gaps in both regular service and accessible vehicle service. We write this letter to (1) emphasize the importance of the recommendations for people with disabilities outlined in the report, and (2) to impress the need to implement these recommendations *expediently*.

**The report provides research and rationale for the recommendations but we have yet to see the recommendations made actionable in a timely manner.**

We would like to reference court case *Laidlaw Transit Ltd. v Alberta (Human Rights and Citizenship Commission)* (2006 ABQB 874). The Alberta Court of Queen's Bench in *Laidlaw*, confirmed that "failure to take positive steps to ensure that disabled individuals benefit equally from services offered is discriminatory" and determined that disabled Edmonton taxi users are entitled to "24 hours a day, 7 days a week wheelchair accessible taxi service customarily available to non-disabled Edmonton taxi users.

As we reference accessibility in this letter we are referring to a spectrum of disabilities. When thinking about accessibility, it is common to default to wheelchair access; however, there are diverse needs for riders who are Deaf or hard of hearing, blind or low vision, as well as those with developmental, emotional, physical and invisible disabilities. We have added some specific recommendations at the end of this letter to supplement the Pivotal Research Report's recommendation to "Consider Vehicle Accessibility Beyond Wheelchair Access".

### Report Recommended Actions and Key Considerations

#### Provide Drivers with Financial Supports and Incentives

There is a significant, yet understandable lack of driver willingness to operate an accessible vehicle because of the greater costs for drivers to purchase, operate, and maintain an accessible vehicle as well as the longer distance to travel to a call and the time it takes to assist riders. The AAC recognizes this as a primary factor that negatively impacts the number of accessible taxis and therefore the ability to secure an accessible taxi for those with disabilities.

The current concern of the AAC is not related to the number of accessible licenses available. Our concern is that the onus is on the drivers to take a monetary loss to operate an accessible vehicle. We are asking for the city to remedy this inequity as it would be an important way to improve service delivery and usage.

The AAC supports the following recommendations from the report:

- Capital Cost Subsidies: A 5-year recurring financial benefit to subsidize the purchase of a new accessible vehicle or to convert an existing vehicle to meet accessibility standards.
- Operating Cost Subsidies: for annual vehicle maintenance or a per-trip incentive .
- Customer Service Incentives: Provide acknowledgment or reward to drivers who perform exceptional customer service when fulfilling accessible trip requests, particularly in neighbourhoods with fewer accessible taxis in circulation. While

the AAC does see value in a customer service incentive, we feel it should take the form of a monetary award as opposed to a certificate or plaque of recognition.

- No-Fault Insurance Exemption: City to seek an exemption for the transportation industry.

The AAC suggests the following additional recommendations:

- The immediate creation of a pilot program to provide drivers with financial support and incentives to improve service in the short term and determine best strategies for implementation in 2023.
  - Start by providing incentives to drivers in specific geographical locations to create even service and delivery spread.
- Waive the fee for an accessible driver's license and/or vehicle license

### **Implement Rider Subsidies**

The cost of an accessible taxi may be a financial strain for people with disabilities as many people with disabilities are more likely to have a lower income and rely on accessible taxis as their primary means of transportation. We ask for City Council to consider financial subsidies and/or other incentives to mitigate the costs of accessible taxis and develop an appropriate qualification process.

The AAC supports the following recommendations from the report:

- Consider the use of a set number of free rides or discounted coupon books
- Create a subsidy system that allows riders to pay only the cost of public transit

The AAC suggests the following additional recommendations:

- The immediate creation of a rider subsidy pilot program to improve service in the short term and determine best strategies for implementation in 2023
- Consider using the levy funds collected from Transportation Network Companies; like Uber, to fund accessible taxi rider subsidies.

We would like to note that rider subsidies will be of little benefit if the incentive for operating an accessible vehicle does not improve. A rider subsidy alone will not solve the issue of greater overhead costs for drivers to purchase or modify, operate and maintain an accessible vehicle. Success is dependent on using an integrated rider/driver subsidy approach to improve service delivery.

### **Create a Self-Sustaining Fund to Invest in Critical Supports**

The AAC supports the recommendation to create a self-sustaining Accessibility Fund to provide supply - and demand - side support; as demand will likely increase as our population increases and ages. The report suggests supporting this fund with a future levy; we are aware that DATS' budget is primarily supported by a City of Edmonton levy

and it does not adequately fund the current demand of users and supports for drivers. We suggest that the recommendations be supplemented by a more robust self-sustaining fund.

The AAC supports the following recommendations from the report:

- Implement or increase a per-trip levy to Transportation Network Companies to fund accessible service and programs
- Marginally increase the cost of traditional licenses, with the surplus put into an Accessibility Fund to incentivize uptake of accessible vehicle licenses.

The AAC suggests the following additional recommendations:

- Install a small surcharge (eg. \$0.25 per ride) as a “Safety and Accessibility Fee” to all Vehicle For Hire rides to fund accessible services and programs and to implement safety measures
- Research and develop a long-term, sustainable Accessibility Fund to provide supply and demand support that leverages provincial and/or federal grants and other funding sources as accessibility standards improve in Canada (where available/applicable)

### **Implement a Centralized Booking Dispatch System**

Jurisdictional scans have shown a centralized booking system to:

- improve the ability for riders to secure a ride
- improve wait times
- alleviate long travel distances, which expense the driver
- alleviate booking difficulties
- alleviate multiple vehicles (accessible and otherwise) attending one call
- ensures Accessible Taxi Priority (S.13 Vehicle For Hire Bylaw 17400, April 6, 2021)
- improve the ability to collect data and metrics to improve system performance
- potentially decreases costs, which can be allocated as subsidies for accessible vehicle service

The AAC supports the following recommendations from the report:

- allocate funds and resources to develop an effective booking platform that will benefit both drivers and users
- work with other service providers and DATS to assess and update their dispatch interfaces and integration capabilities
- Integrate dispatch, reservation software systems and booking interfaces
- ensure an accessible Multi-Mode Platform Interface (phone, online, app) that also supports payment capabilities, reservations, specific rider needs and safety
- Apply a GBA+ lens when determining system and service improvements

### **Improve and Standardize Accessible Driver Training**

It is imperative that drivers receive adequate technological, communication, and sensitivity training to optimize service and ensure safety for themselves and their riders. While drivers feel they are receiving adequate accessible driver training, a lack of knowledge around accessibility is a concern for riders who require accessible accommodations.

The AAC supports the following recommendations from the report:

- Develop standardized driver and dispatcher training for all service providers
- Provide annual mandatory driver training
- Provide continuous disability awareness training as current technological and sensitivity standards evolve
- Review driver and dispatch training material annually to ensure it is reflective of current accessibility standards, including driver, dispatcher and user experiences.
- Ensure the disability community is contributing to educational material, and that it is available in a variety of formats for all drivers.

The AAC suggests the following additional recommendations:

- Update Vehicle For Hire Bylaw 17400 to include mandatory driver training
- Expedite mandatory disability awareness training for all drivers and dispatchers, not just those with accessible licenses (Passenger Assistance, Safety, Sensitivity)
- Ensure an adequate rider feedback and data collection system that archives complaint, process and response to accessibility concerns, whether from 311 or directly to the company. (Note, a Centralized Booking Dispatch System would be able to more efficiently collect and analyze data and metrics)
- Provide additional online educational opportunities and refresher courses that include Case Studies.
- Ensure continuous engagement between AAC, WAVE, VFH and other stakeholders regarding process, updates, changes and feedback.
- Create a VFH Advisory Group consisting of drivers, taxi company owners, paratransit indigenous, senior, women's safety and accessibility groups.
- Embed Cultural and Gender Sensitivity Training to more broadly deliver the highest and safest quality of service
- Provide accessible educational tools such as first language training, interpretation and/or translation to assist drivers with educational materials

### **Consider Vehicle Accessibility Beyond Wheelchair Access**

## Attachment 2

Vehicle Accessibility requires a variety of design and sensitivity elements. Below are additional recommendations to improve accessible service.

- Braille signage inside vehicle passenger door displaying name of taxi company, fleet number and taxi company phone number and advertise 311 for complaints and feedback
- Optical Character Recognition Software
- audio enabled meters
- audio enabled real-time navigation and location GPS
- hearing induction loops, intercoms, swivel seats
- use or develop an accessible booking and payment app that will feature:
  - plain language, high contrast, accessible fonts, simple interface
  - an option to identify accessibility needs (ex: “Deaf / hard of hearing”) when booking service
  - provide a text message in conjunction with an auto call for Deaf and hard of hearing users
  - provide a text option for riders to contact the drivers
  - uses small amounts of data
- communication aids consist of drivers keeping pen and paper in their car and the ability to use Notepad on their phones
- clear face masks will allow people who are Deaf and hard of hearing to read lips.
- Expand door-to-door service training from DATS contracted drivers to all taxi drivers

### **Complaint Process and Conflict Resolution**

While this item was not addressed specifically in the report, we feel this is an important addition in order to improve industry service levels.

- improve customer service and responsiveness
- create a standard process and procedures for complaint resolution
- implement a monthly reporting mechanism with various data points
- consider stakeholder consultations as a data collection mechanism
- ensure the complaint process and information is accessible (phone, app, online)
- use an ombudsman to investigate driver misconduct and complaints

We appreciate you taking the time to review our letter of support and recommendations.

Sincerely,

Members of the AAC

Tonia LaRiviere, Chair, Accessibility Advisory Committee

Paige Reeves, Vice-Chair, Policy Sub-Committee

Sheri Klassen, Vice-Chair, Community Engagement