

# Seven Individualized Accessibility Plan Pitfalls to Avoid



The *Accessibility for Ontarians with Disabilities Act (AODA)*, *Accessible Canada Act (ACA)*, and other [accessibility laws](#) that have recently taken effect in much of the country are designed to tear down systemic barriers faced by persons with disabilities across different aspects of public life, including the workplace. For companies and their HR directors, perhaps the biggest compliance challenge is the requirement to implement a process for developing what are called Individualized Accessibility Plans (IAPs) for disabled employees. Here are seven common pitfalls that undermine the IAP process and what you should do to avoid them.

## **1. Confusing IAPs with Reasonable Accommodations**

Human rights laws require employers to provide [reasonable accommodations](#) that a disabled employee needs to the job, which may include exemptions to no-pets policies for assistance animals, special schedules, or equipment. Employers must have a process for assessing whether requested accommodations are reasonable and what alternatives are available if they're not. Although there's overlap, an IAP isn't just a response to a request for a specific accommodation but a broad document that encompasses all accommodations and supports an individual with the employee's particular disabilities and capabilities needs to make their job accessible.

**Compliance Strategy:** Establish a process for creating IAPs that sets out the methods you use to:

- Assess an individual employee's disability-related needs.
- Enable employees to participate in IAP creation.
- Identify and eliminate the workplace barriers the employee faces.
- Implement, review, and maintain appropriate accessibility supports.

## **2. Failing to Define the Scope of the IAP**

An IAP should address more than immediate job adjustments.

**Compliance Strategy:** Ensure that your IAPs also incorporate:

- [Accessible websites](#), formats, and communication supports.
- Workplace [emergency response and evacuation protocols](#) and information.

- [Return-to-work](#) or performance management considerations.

### 3. Intrusive Collection of Personal Medical Information

Accessibility laws don't require employers to gather diagnoses, detailed medical histories, or other personal information protected by privacy laws. The legal focus is on barriers and functional limitations, not the underlying condition. Over-collection creates privacy risk and distracts from effective planning.

**Compliance Strategy:** Ensure your IAP procedure provides for collecting only the information necessary to identify and remove workplace barriers. It should also include safeguards for protecting the confidentiality of whatever personal information you do collect.

### 4. Lack of Employee Participation

Accessibility laws require employees to be involved in developing their own IAPs. So, processes driven by predominantly bureaucratic or management concerns without employee input and feedback are highly problematic.

**Compliance Strategy:** Provide documentation on how the employee:

- Requested or contributed to the plan.
- Reviewed proposed measures.
- Participated in finalizing the plan.

### 5. Using a One-Size-Fits-All IAP Template

Each IAP must be tailored to the employee and circumstances involved. Accordingly, a "standard IAP" is something of an oxymoron.

**Compliance Strategy:** While IAPs can't be generic, having an [IAP template](#) can help you organize the process and information you need during its various stages. Just make sure the template is open-ended and doesn't list support measures or other substantive details that you can't identify unless and until you perform an individualized assessment of the employee's needs, capabilities, and job responsibilities.

### 6. All Plan, No Implementation

Accessibility laws require not just planning, but implementation of accessibility supports. An IAP that just sits in a file and gathers dust is worse than useless.

**Compliance Strategy:** Ensure that each IAP clearly identifies:

- What will be done
- Who's responsible
- When it will occur.

Track completion as part of the IAP process.

### 7. Failing to Review and Update the Plan

Creating an IAP isn't just a one-and-done. The plan needs to evolve to keep up with new technologies and changes to the employee's accessibility needs.

**Compliance Strategy:** IAPs should provide for mandatory and continual review, both periodically and in response to triggers such as changes in the employee's job

responsibilities. They should also give employees the right to request IAP review and changes, along with procedures for initiating and reviewing those requests.