

# Accessibility Plan – Rogers Foods Canada Inc.



## Executive Summary - Goal & Outcomes

### Goal (36 months):

Establish a consistent, auditable accessibility program that:

- Ensures equal employment opportunity through a robust, reasonable accommodation process.
- Brings facilities and equipment into conformance with ADA 2010 Standards (prioritizing high-impact, high-use areas).
- Delivers accessible digital experiences (intranet, websites, training, HRIS portals) to WCAG 2.2 AA.
- Integrates accessibility into procurement, emergency planning, and safety.
- Use metrics, audits, and governance to maintain continuous improvement and legal defensibility.

### Primary Outcomes:

- Written policies, standardized forms, and documented processes.
- Completed facility barrier assessments and prioritized remediation.
- A fully operational accommodation workflow with training for managers/supervisors.
- Accessible digital content and procurement checklists.
- Annual audits, leadership reporting, and external verification on high-risk areas.

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## Governance & Roles

- **Executive Sponsor:** Joe Girdner
- **Program Owner:** Stacy Muir, EHS Manager
- **Steering Committee:** HR, EHS, Facilities/Engineering, IT, Legal/Privacy, Communications, Operations
- **Site Accessibility Leads:** VP of Operations, Pip Jordan, Plant Manager, Martin Becker and Plant Manager, Todd Larson
- **Employee Resource Input:** Confidential feedback channel available on the Rogers Foods website

## Policies to Approve (Year 1):

1. ADA/Accessibility Policy (employment & public-facing obligations)
2. Reasonable Accommodation Policy (with interactive process)
3. Digital Accessibility Policy (WCAG 2.2 AA)
4. Accessible Procurement Policy (products, software, equipment)
5. Accessible Emergency Procedures Policy (with Personal Emergency Evacuation Plans, PEEPs)

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## High-Level Timeline (36 Months)

### Year 1: Foundation & Risk Reduction

- Stand-up governance, policies, forms, training.
- Complete enterprise-wide ADA facility barrier assessments and digital audits.
- Fix critical “life safety / high impact” barriers (entrances, routes, restrooms, parking signage, emergency alarms).
- Launch accommodation process and case management tracking.

### Year 2: Remediation & Integration

- Execute prioritized facility and digital remediations.
- Embed accessibility into procurement and change control (MOC).
- Expand training to supervisors, engineers, content creators.
- Validate effectiveness via mid-cycle audits and user testing.

### Year 3: Maturity & Assurance

- Close gaps, certify critical areas, and conduct an external audit for high-risk sites/systems.
- Formalize continuous improvement cadence, monitor KPIs, refresh training, and publish annual report.

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## Detailed Workplan

### 1) Employment & Reasonable Accommodation

#### Year 1

- Approve Reasonable Accommodation Policy and interactive process SOP:
  - Intake → Acknowledgement → Medical documentation (if needed) → Interactive dialogue → Determine effective accommodation → Implement → Review.
- Stand up confidential case tracking (e.g., SharePoint list with secure permissions or HRIS case module).
- Create templates:
  - Employee request form (multiple channels: email/web/HR kiosk)
  - Manager guidance
  - Healthcare provider form (when necessary)
  - Decision letter (approved/alternative/undue hardship)
  - Temporary accommodation & trial periods (30–90 days)
- Train HR, EHS, managers, and supervisors (scenario-based, 60–90 min).
- Establish undue hardship criteria aligned to company scale and ops.
- Build PEEPs for employees who need assisted evacuation.

#### Year 2

- Integrate accommodation checkpoints into:

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- **Recruiting & onboarding** (job postings with essential functions, accommodations invite)
- **Return-to-work** post-injury processes
- **Performance management** (avoid adverse actions linked to unmet accommodation needs)
- Track and analyze accommodation trends, cycle times, and satisfaction.

## Year 3

- Refine SOPs; conduct a third-party legal/process review.
- Publish summarized results internally (protecting privacy): volume, cycle time, themes, improvements.

## Success Metrics

- Time-to-first-contact  $\leq$  3 business days; median case cycle time  $\leq$  30 calendar days.
- $\geq$  90% employee satisfaction with the process (confidential spot surveys).
- 100% of denials documented with undue hardship analysis and alternatives considered

## 2) Facilities, Equipment, & Wayfinding (2010 ADA Standards)

**Scope:** Entrances, parking, routes, doors, ramps, stairs, elevators, restrooms/locker rooms, breakrooms, counters, signage, alarm systems, meeting spaces, training rooms, visitor reception, and testing/labs where applicable, plus production equipment interaction points where the public or employees must access.

## Year 1

- Conduct ADA barrier assessments at each site using a qualified assessor or internal team trained on 2010 Standards.

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- Produce **Remediation Plan & Capital Forecast** with risk tiers:
  - **Tier 1 (Critical):** Life safety, ingress/egress, primary routes, restrooms, alarm systems, emergency communication.
  - **Tier 2 (High):** Parking layout/signage, door hardware/closers, counters, workstation access, cafeteria.
  - **Tier 3 (Moderate):** Secondary routes, tactile signage standardization, reach ranges, small hardware updates.
- Immediate fixes for low-cost/high-impact items (e.g., door lever sets, bathroom grab bars at correct heights, contrasting noise, clear floor space).

## Year 2

- Execute Tier 1 & Tier 2 projects (e.g., regrading ramps; accessible stalls; tactile/Braille signage; accessible drinking fountains; reception counter sections at 34" max).
- Include accessibility in Management of Change (MOC) for remodels, new equipment, or layout changes.
- Update emergency alarm systems to include visual strobes and auditory reach; ensure alert text channels exist.

## Year 3

- Close remaining Tier 3 items.
- Perform post-remediation audits; document as-built conformance and maintenance plans (e.g., door pressures, signage integrity, winter accessibility).
- External spot-check at one high-risk site.

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## Success Metrics

- 100% sites assessed in Year 1;  $\geq$  80% Tier 1/2 resolved by end of Year 2; 100% Tier 3 by Year 3.
- Zero access-related incident findings in internal safety audits.
- Preventive maintenance checklists include accessibility items (quarterly).

## 3) Digital Accessibility (WCAG 2.2 AA)

**In Scope:** External website(s), vendor portals involving your content, intranet, LMS, eLearning, PDFs, HRIS/benefits portals, forms, kiosks, digital signage.

### Year 1

- Audit priority systems/content for WCAG 2.2 AA barriers; include PDF forms and training modules.
- Write Digital Accessibility Standard & Style Guide:
  - Semantic headings, alt text, keyboard navigation, color contrast, captions/transcripts for media, error prevention, focus order.
- Establish remediation backlog and assign owners (IT, Comms, L&D).
- Procure/enable basic tooling (contrast checkers, linters, PDF remediation tools, captioning).
- Add an Accessibility Statement to public site with contact channel.

### Year 2

- Remediate high-traffic pages, forms, training, and all new content to 2.2 AA.

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- Incorporate accessibility into SDLC and content publishing workflows (prepublish checks).
- Require VPAT/ACR from vendors and contractually bind them to 2.2 AA timelines.

## **Year 3**

- Complete backlog; run user testing with assistive tech users (screen readers, keyboard-only).
- Annual reaudit; publish progress in internal report.
- Add continuous monitoring for new regressions during releases.

## **Success Metrics**

- 95% of public website page views are accessible by end of Year 2; 100% by mid-Year 3.
- 100% of new content meets 2.2 AA at time of publish (go/nogo check).
- All priority PDFs/forms remediate by end of Year 2.

## **4) Training & Culture**

### **Audiences & Cadence**

- All Employees (annually): Accessibility awareness + how to request accommodations (15–20 min eLearning).
- Managers/Supervisors (Year 1 on, then every 2 years): Duty to engage in interactive process; confidentiality; examples; documentation.
- Facilities/Engineering & EHS: ADA 2010 design basics, barrier identification, PM checks.
- IT/Developers/Content Authors/L&D: WCAG 2.2 AA fundamentals and tools.

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- **Security & Emergency Teams:** Assisting people with disabilities; evacuation equipment usage; PEEPs.

## Materials

- Short job aids, checklists, and video microlearning.
- Scenario-based workshops (e.g., chemical operator role with lifting limitation; quality lab tech with low vision).

## KPIs

- $\geq 95\%$  completion for mandatory courses each cycle.
- Post-training knowledge check pass rate  $\geq 90\%$ .
- Reduction in avoidable accommodation escalations.

## 5) Procurement & Vendor Management

### Year 1

- Update procurement checklists to include:
  - Facilities: ADA conformance requirements in specifications and RFPs.
  - IT/SaaS: WCAG 2.2 AA clauses and VPAT/ACR requirement; remediation SLAs.
  - Equipment: Reach ranges, operability with one hand,  $\leq 5$  lb. where applicable, tactile/visual cues.
- Train buyers and project managers.

### Year 2–3

- Enforce accessibility gate checks in purchase approvals.

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- Track and report vendor remediation progress; escalate noncompliant vendors.

## 6) Emergency Preparedness & Safety Integration

- Develop PEEPs for employees who request them; discreet tagging in muster rolls (privacy-protective).
- Ensure area-of-refuge signage and two-way communication where applicable.
- Stock and maintain evacuation chairs where needed, and train floor wardens.
- Include accessibility checks in drills (e.g., route clearance, communication).
- Ensure multi-modal alerts (visual, auditory, text/intranet push).

**KPIs:** PEEP coverage for 100% of requesters;  $\geq 2$  drills/year include accessibility scenarios per site.

## 7) Metrics, Audit, & Reporting

### Core KPIs

- Accommodation cycle time; approval ratio; reopen rate.
- Facilities remediation completion by tier; PM hit rate on accessibility tasks.
- Digital accessibility scores (audit pass rates); % new content 2.2 AA compliant.
- Training completion; survey results on inclusion and accessibility.

### Audit Cadence

- **Quarterly:** Internal spot checks (facilities signage/heights/door forces; digital spot checks).

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- **Annually:** Full program review + leadership report.
- **Year 3:** External audit sample (one plant, one major system).

## Budgetary Planning (Indicative)

- **Year 1:** Policy development, training build, assessments, quick fixes, basic tools.
- **Year 2:** Capital projects (ramps, restrooms, signage, alarms), digital remediation, vendor contracts.
- **Year 3:** Closeout work, external audits, continuous improvement tools.

## Document Set (Create in Year 1; Maintain thereafter)

1. ADA/Accessibility Policy (employment & public-facing).
2. Reasonable Accommodation SOP + forms:
  - Request form, manager guidance, provider form, decision templates, trial agreement.
3. Digital Accessibility Standard + Web Style Guide (WCAG 2.2 AA).
4. Procurement Accessibility Checklist + contract clauses (facilities, IT/SaaS, equipment).
5. Emergency Accessibility & PEEP SOP + drill checklist.
6. Facility Assessment Template + project tracker (RACI, budget, due dates).
7. Training materials & job aids (role-based).
8. Annual Accessibility Report (internal).

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## RACI Snapshot (Abbreviated)

Workstream	HR	EHS	Facilities	IT	Legal	Ops	Comms	Procurement
Policy & Governance	A/R	C	C	C	C	C	C	C
Accommodation Process	A/R	C	C	C	C	C	C	I
Facility Assessments & Fixes	I	C	A/R	I	I	C	I	C
Digital Accessibility	I	I	I	A/R	C	I	A/R	C
Procurement Clauses	C	C	C	C	C	I	I	A/R
Emergency/PEEPs	C	A/R	C	I	C	A/R	I	I
<i>A=Accountable, R=Responsible, C=Consulted, I=Informed</i>								

## Risk Controls & Legal Defensibility

- **Documentation:** Keep contemporaneous records of the interactive process, alternatives evaluated, and undue hardship rationale.
- **Prioritization:** Use risk-tiering based on safety, usage, and feasibility; publish schedules.
- **Training & Audits:** Demonstrate continuous effort and corrective action tracking.
- **Vendor Contracts:** Shift obligations explicitly; retain remediation leverage.
- **Privacy:** Restrict medical information; separate from personnel files.

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## Quick Start: First 90 Days

1. Appoint sponsor and steering committee; approve charter.
2. Publish interim Reasonable Accommodation process and set up intake inbox/form.
3. Kick off facility and digital audits (scope, tools, timeline).
4. Launch manager training (short course + Q&A clinic).
5. Identify and complete 10–15 quick fixes (high-traffic doors, signage, restroom accessories).
6. Post public Accessibility Statement with contact channel.

## Note

- This plan is compatible with the Accessible Canada Act and Accessible BC Act focus areas: employment, built environment, information & communication, procurement, and emergency measures.