



Regular Council Meeting

To:	Mayor and Council
Date:	September 2, 2025
From:	Cindy Page, Clerk Mark Froment, Deputy Clerk
Report Number:	Corporate Services 2025-11
Subject:	Updated Integrated Accessibility Standards Regulation Policy

Recommendation:

That Council adopt the updated Integrated Accessibility Standards Regulation Policy.

Overview:

Under Ontario Regulation 191/11 (O. Reg. 191/11), Integrated Accessibility Standards, as a designated public sector organization the Township of Cavan Monaghan is required to meet various accessibility standards for communication materials, employment and training, the design of public spaces, and customer service. As part of these standards, the Township is required to develop, implement, and maintain policies governing how it is achieving accessibility by meeting the standards in O. Reg. 191/11. The Township met this requirement in December 2013 when Council approved the Integrated Accessibility Standards Regulation (IASR) Policy.

Since Council first adopted the Policy, there have been significant changes to O. Reg. 191/11. Ontario Regulation 429/07, Accessibility Standards for Customer Service, was revoked in July 2016 and many of the standards for customer service are now found in O. Reg. 191/11. There are also standards for the design of public spaces included in the Regulation that lay out accessibility requirements for various pieces of public infrastructure including recreational trails, parking, playgrounds, and exterior paths of travel. Moreover, the Township is required to consult its Accessibility Advisory Committee when constructing or redeveloping some of these public spaces.

The Township's IASR Policy has been overhauled to reflect these changes in accessibility standards. The Policy identifies the legal requirements in O. Reg. 191/11 and states generally how the Township is meeting them. These are broken out into sections that reflect the various standards in O. Reg. 191/11 including:

- Training
- Information and Communication
- Employment
- Transportation

- Design of Public Spaces
- Customer Service

The Township is also required to establish, implement, and maintain a Multi-Year Accessibility Plan outlining a more specific strategy on how it is meeting the requirements under O. Reg. 191/11. Staff are currently developing an updated draft of its Multi-Year Plan that it will first bring to the Accessibility Advisory Committee for consultation, as required under O. Reg. 191/11, before presenting a report on it to Council. Staff will continue to review how the Township provides services and gives access to its facilities to people with disabilities to ensure it is compliant with the Regulation and the IASR Policy so that it achieves accessibility for all Ontarians.

Financial Impact:

None at this time.

Linkage to the Strategic Plan:

This Policy supports the value of inclusivity in the Strategic Plan by ensuring services, opportunities, and resources are accessible to everyone. It aligns with Strategic Priority #2, Community Vitality, Objective 1: Enhance and optimize recreation in the Township and Objective 4: Build upon indoor & outdoor spaces to promote health and wellness.

Attachments:

Attachment No. 1 – Updated Integrated Accessibility Standards Regulation Policy
Attachment No. 2 – Integrated Accessibility Standards Regulation Policy – 2013

Respectfully Submitted by,

Reviewed by,

Cindy Page
Clerk

Yvette Hurley
Chief Administrative Officer

Mark Froment
Deputy Clerk

 <p style="text-align: center;">Integrated Accessibility Standards Regulation (IASR) Policy</p>			
Policy Title:	Integrated Accessibility Standards Regulation	Policy Number	2025-XX
Effective Date:	December 2, 2013	Revision Date:	September 2, 2025
Prepared By:	Corporate Services	Approved By:	Council

Integrated Accessibility Standards Regulation (IASR) Policy

Policy Statement:

The Integrated Accessibility Standards Regulation Policy is meant to guide the Township in meeting the requirements laid out under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), and Ontario Regulation 191/11, Integrated Accessibility Standards (O. Reg. 191/11). Moreover, it seeks to create a more accessible environment for people with disabilities when utilizing the Township's facilities and accessing the goods and services the Township provides to residents. The ultimate aim of this policy is to assist the Township in aspiring to create barrier free conditions for people with disabilities so that there is equal opportunity for everyone to access what the Township offers. This will be done by consulting with people with disabilities and incorporating accessibility when constructing or renovating Township facilities, when going through the procurement process, and in designing and reviewing the delivery of goods and services.

Background:

Under O. Reg. 191/11, there are a series of accessibility standards for information and communications, employment, transportation, the design of public spaces, and customer service. As a designated public sector organization under the regulation, the Township is required to meet these standards. The Township is also required to create and maintain policies governing how it will achieve these accessibility standards. When Ontario Regulation 429/07, Accessibility Standards for Customer Service, was revoked in July 2016, many of the standards in that regulation were incorporated into O. Reg. 191/11. This policy has been updated to reflect that change. The Township continues to maintain a separate Accessible Customer Service Standards Policy as is required under the regulations.

1.0 Definitions:

“Accessible Formats” may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

“Communication Supports” may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications;

“Disability or Disabilities” shall mean

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device
- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997;

“Multi-Year Accessibility Plan or Plan” shall mean the plan required under section 4(1) of Ontario Regulation 191/11, Integrated Accessibility Standards, that requires all designated public sector organizations establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation;

“Off-street Parking Facilities” shall mean open area parking lots and structures intended for the temporary parking of vehicles by the public, whether or not the payment of a fee is charged and includes visitor parking spaces in parking facilities;

“On-street Parking” shall mean parking spaces located on highways, as defined in subsection 1 (1) of the *Highway Traffic Act*, that provide direct access to shops, offices and other facilities whether or not the payment of a fee is charged;

“O. Reg. 191/11” shall mean Ontario Regulation 191/11, Integrated Accessibility Standards, under the Accessibility for Ontarians with Disabilities Act, 2005, as amended, and any succeeding regulations that fall under a different name.

“Recreational Trails” shall mean public pedestrian trails that are intended for recreational and leisure purposes;

“Rest Area” shall mean, in respect to recreational trails and exterior paths of travel, a dedicated level area that is intended for public use to allow persons to stop or sit;

“Self-service Kiosk” shall mean an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both

“Service Animal” shall mean an animal whose purpose is to support a person with a disability, can be readily identified as a service animal through visual indicators such as a vest or harness, is supported by documentation from a regulated health professional, and follows the definition under O. Reg. 191/11;

“Services” shall mean any goods or services provided by the Township including those provided when accessing Township buildings, facilities, and premises.

“Township” shall mean The Corporation of the Township of Cavan Monaghan;

“Web Content Accessibility Guidelines or WCAG” shall mean the World Wide Web Consortium’s recommendations for websites on the internet.

2.0 Multi-Year Accessibility Plan:

- 2.1** Township of Cavan Monaghan will maintain and update a Multi-Year Accessibility Plan that outlines the Township’s strategy to prevent and remove barriers to meet the requirements under O. Reg. 191/11.
- 2.2** The Plan will be made available on the Township’s website.
- 2.3** The Plan will be provided in a timely manner in an accessible format if requested.
- 2.4** The Township shall prepare an annual status report on the progress of measures taken to implement the Plan, present it to Council, and post that status report on its website.
- 2.5** The Plan shall be reviewed, and if necessary, updated, at least once every five (5) years.
- 2.6** The Township’s Accessibility Advisory Committee will be consulted for any review, updates, and the annual status reports of the Plan.
- 2.7** The Plan will include procedures for the preventative and emergency maintenance of the accessible elements in public spaces required under O. Reg. 191/11 as well as procedures for dealing with temporary disruptions to the use of them when not in working order.

- 2.8** If a public transit service is being developed or operated in the Township or a taxicab service is licenced, the Plan will contain the required components for transportation service providers and taxicabs in O. Reg. 191/11.

3.0 Procurement or Acquisition of Goods, Services, or Facilities:

- 3.1** The Township will incorporate accessibility design, criteria, and features when procuring or acquiring goods, services, or facilities, except where it is not practicable to do so.
- 3.2** When it is not practicable to incorporate accessibility design, criteria, and features into the procurement of goods, the Township will provide an explanation when requested.

4.0 Information and Communication:

- 4.1** Staff will continue to review the Township website, any internal websites and operational systems, and any other websites used by the Township to deliver services, receive or respond to feedback, or communicate with the public so that they conform with the WCAG 2.0 Level AA standards.
- 4.2** The Township will continue to review all forms, applications, and other means for delivering services, receiving or responding to feedback, and communicating with the public to ensure they are formatted to meet accessibility standards.
- 4.3** The Township will provide in a timely manner records under its control that are required to be available in accessible format including the Emergency Response and Management Plan. If the Township is unable to provide or convert any of the items requested in an accessible format, an explanation of why it is unconvertible and a summary of the contents will be provided.
- 4.4** Communication supports for people with disabilities will be maintained by the Township and provided in a timely manner when requested.
- 4.5** The Township website will indicate how to request records and feedback forms in accessible formats and what communication supports are available.

5.0 Training:

- 5.1** The Township shall provide training on the standards of O. Reg. 191/11, the Human Rights Code, and its accessibility policies to all staff and volunteers for the Township, all persons who develop Township policies, and any other person who provides good, services, or facilities for the Township.

- 5.2** Any training conducted to meet the criteria set out in section 5.1 shall align with the responsibilities and duties for the Township of the person being trained.
- 5.3** If a public transit service is being developed or operated in the Township, the Township will provide training to all employees and volunteers that are providing transportation services, as required under O. Reg. 191/11.
- 5.4** If the Township's accessibility policies or other regulations change, the Township will provide training on the updated policies as soon as is practicable.
- 5.5** The Township will maintain records of all training provided that will be retained according to the retention period identified in the Township's Records Retention By-law.

6.0 Employment:

- 6.1** During the recruiting process, the Township will notify employees and the public about the availability of accommodations for applicants and those selected for further assessment.
- 6.2** As part of the offer of employment, the Township will notify the successful applicant of its policies for accommodating employees with disabilities.
- 6.3** All employees will be informed of policies used to support employees with disabilities and provide updated information for any new or amended policies.
- 6.4** The Township will maintain and review its written process for the creation of documented individual accommodation plans for employees with disabilities and for those returning to work from a disability who require accommodation.
- 6.5** The Township will take into account the accessibility needs of employees with disabilities and individual accommodation plans when conducting performance reviews, for career development and advancement, or when reassigning them to another position.
- 6.6** The Township shall consult with any employee that requires accessible formats or communication supports to conduct their job on how to provision and arrange them.
- 6.7** The Township will provide individualized emergency response information for any employee that would require accommodation in an emergency due to a disability as well as any person designated by the employer to provide assistance to the employee.

7.0 Transportation:

- 7.1** The Township will ensure that all requirements under O. Reg. 191/11 are met if a public transit service is being developed or operated by the Township.
- 7.2** The Township's Accessibility Advisory Committee will be consulted on the development of accessible design criteria to be considered in the construction, renovation, or replacement of bus stops and shelters for any public transit service provided by the Township.
- 7.3** If the Township licences taxicabs within its jurisdiction, the Township shall consult the Accessibility Advisory Committee on the proportion of on-demand accessible taxicabs required and will ensure that all requirements under O. Reg. 191/11 are met.

8.0 Design of Public Spaces:

Consultation:

- 8.1** The Township will consult the Accessibility Advisory Committee on the following components in the design of public spaces within it:
 - 8.1.1** On the slope and need, location, and design of ramps, rest areas, passing areas, viewing areas, amenities on the trail, and any other pertinent features when constructing or redeveloping recreational trails that it intends to maintain.

Trails solely intended for cross-country skiing, mountain biking, motorized snow vehicles, and off-road vehicles and those that are deemed wilderness trails, backcountry trails, or portage routes are exempted from this requirement;
 - 8.1.2** On the needs of children and caregivers with various disabilities when constructing or redeveloping outdoor play spaces including parks, playgrounds, and splash pads;
 - 8.1.3** On the design and placement of rest areas when constructing or developing exterior paths of travel including sidewalks and street crossings;
 - 8.1.4** On the need, location, and design of accessible on-street parking spaces when constructing or redeveloping on-street parking.

Design, Construction, and Review of Public Spaces:

- 8.2** The Township will ensure that the accessible design standards are met for the following public spaces and any other items subject to accessible design standards under O. Reg. 191/11:

- 8.2.1 Recreational trails except for trails solely intended for cross-country skiing, mountain biking, motorized snow vehicles, and off-road vehicles and those that are deemed wilderness trails, backcountry trails, or portage routes;
- 8.2.2 Outdoor public use eating areas consisting of tables in public areas, such as public parks, which are specifically intended for use by the public as a place to consume food;
- 8.2.3 Outdoor play spaces including areas that have play equipment, such as swings or features such as logs, rocks, sand, or water, where the equipment or features are designed and placed to provide play opportunities and experiences for children and caregivers;
- 8.2.4 Exterior paths of travel inclusive of sidewalks, ramps, connecting stairs, curbs, and pedestrian control signals, except for those regulated under O. Reg. 350/06, the Building Code, or any other exemptions under O. Reg. 191/11;
- 8.2.5 Off-street parking facilities;
- 8.2.6 Service counters, fixed queuing guides, and waiting areas.
- 8.3 Council shall seek the advice from the Accessibility Advisory Committee on the accessibility for persons with disabilities during the design stage of any building, structure, or premises or part thereof that the Township is seeking to purchase, construct, renovate, or enter into a lease for.
- 8.4 The Township will continue to conduct audits for accessibility of Township buildings, structures, or premises, taking into account the typical resource and technical restraints the Township operates under, and will consult the Accessibility Advisory Committee and any relevant staff when carrying out the audits.
- 8.5 The Township will maintain a procedure for the review of site plans the Committee selects during the Site Plan Control approval process to ensure their advice is received in a timely manner.
- 9.0 **Customer Service:**
- 9.1 **Accessible Customer Service Standards Policy:**
- 9.1.1 The Township shall maintain and review at least every five (5) years its Accessible Customer Service Standards Policy governing the provision of services to persons with disabilities.
- 9.1.2 The Policy must cover the use of assisted devices by persons with disabilities to obtain, use, or benefit from services or facilities provided by the Township.

- 9.1.3** The Policy shall be consistent with the principles laid out in O. Reg. 191/11 including respecting the dignity and independence of persons with disabilities, that processes for the provision of services be integrated into their general provision and provide for opportunity equal to others in them, and that any communication take into account a person's disability.
- 9.1.4** The Policy shall describe the process for accessible customer service training, summarize the content of the training, and specify when the training is provided.
- 9.1.5** The Policy will ensure the maintenance of a process for receiving and responding to feedback about the manner in which it provides goods, services, or facilities to persons with disabilities.
- 9.1.6** The Policy will be provided upon request in a timely manner in an accessible format that accounts for a person's accessibility needs.
- 9.1.7** The Policy or a summary of it will be made available on the Township's website and the Township will seek to post it in locations within Township buildings, facilities, and premises where services are regularly provided.

Accessible Customer Service Standards:

- 9.2** The Township will maintain and review a procedure for providing services to members of the public who are accompanied by a guide dog or other service animal.
- 9.3** If a service animal is prohibited by law from entering a Township building, facility, or premise, then other measures must be available to enable the person with a disability to use the facility or be provided the service.
- 9.4** Support persons will be allowed to accompany any person with disabilities in any Township building, facility, or premise unless otherwise prohibited by law.
- 9.5** The Township will incorporate accessibility features when designing, procuring or acquiring self-service kiosks.



Integrated Accessibility Standards Regulation (IASR) Policy

Purpose:

Under the Accessibility for Ontarians with Disabilities Act, 2005 all public and private sector organizations must meet the requirements of accessibility standards established by regulation. This policy establishes the Integrated Accessibility Standards Regulation in the areas of Employment, Information and Communications and Transportation for the Township of Cavan Monaghan in accordance with Ontario Regulation 191/11 and with the Ministry of Community and Social Services intent to “streamline, align and phase-in accessibility requirements and allow for progress on accessibility and reduce the regulatory burden for obligated organizations”. This regulation came into force July 1, 2011.

Scope and Responsibilities:

This policy has been drafted in accordance with the Regulation and addresses how the Township of Cavan Monaghan achieves accessibility through meeting the Regulation’s requirements. It provides the overall strategic direction that we will follow to provide accessibility supports to Ontarians with disabilities.

The requirements of the Regulation include the establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under the Regulation.

Statement of Organizational Commitment:

The Township of Cavan Monaghan is committed and guided by the four core principles;

- Dignity
- Independence
- Integration
- Equal Opportunity

and supports the full inclusion of persons as set out in the Canadian Charter of Rights and Freedoms, and the Accessibility for Ontarians with Disabilities Act, 2005 . The Township of Cavan Monaghan shall use every effort to ensure that we meet the needs of people with disabilities, in a timely manner, through the implementation of this policy.

Definitions:

- **Accessible Formats** – may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities
- **Accommodation** – means the special arrangements made or assistance provided so that customers, volunteers and employees with disabilities can participate in the experiences available to customers, volunteers, and employees without disabilities; accommodation will vary depending on unique needs
- **Communications** – means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received
- **Designated Public Sector** – means every municipality and every person or organization listed in Column 1 of Table 1 of Ontario Regulation 146/10 (Public Bodies and Commission Public Bodies – Definitions) made under the Public Service of Ontario Act, 2006
- **Individual Accommodation Plan (IAP)** – means a document which outlines the details of individual accommodations for an employee with a disability
- **Mobility Aid** – means a device to assist or otherwise improve the mobility of individuals
- **Mobility Assistive Device** – means a piece of equipment that assists an individual in coping with effects of their disability
- **Web Content Accessibility Guidelines** – means the world wide web consortium recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0

General Provisions:

Multi-Year Accessibility Plan:

The Township of Cavan Monaghan’s Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of Accessibility for Ontarians with Disabilities Act (AODA). We will report annually on the progress and implementation of the plan, post the information on our website and will provide it in alternative formats upon request. The plan will be reviewed and updated at least once every five years.

Procuring or Acquiring Goods, Services or Facilities:

We will use accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practical to do so, in which case, if requested we will provide an explanation.

Training:

The Township of Cavan Monaghan will ensure that training is provided to all employees and regular fee-for-service staff on the requirements of the accessibility standards referred to in the regulation and on the Human Rights Code as it pertains to persons with disabilities. Training will be provided as soon as practicable. If any changes are made to this policy or the requirements, training will be provided. We shall maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

Information and Communications Standard:

The Township of Cavan Monaghan will create, provide and receive information and communications in ways that are accessible to people with disabilities. If it is determined that it is not technically feasible to convert the information or communications or the technology to convert the information or communication is not readily available, we will be obligated to provide the person that requires the information with:

- i) an explanation as to why the information or communications are unconvertible;
- ii) a summary of the unconvertible information or communications.

Emergency Information:

The Township of Cavan Monaghan will provide emergency procedures, plans or public safety information in an accessible format or with appropriate communication supports, as soon as practicable, upon request any information that is currently available to the public.

Feedback:

The Township of Cavan Monaghan has a process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports upon request. We will notify the public about the availability of accessible formats and communication supports.

Accessible Formats and Communication Supports:

The Township of Cavan Monaghan shall be obligated to provide or arrange for accessible formats and communication supports for persons with disabilities:

- Upon request in a timely manner that takes into account the persons' accessibility needs due to a disability;
- At a cost that is no more than the regular cost charged to other persons;
- Consult with the person making the request and determine suitability of an accessible format or communication support;
- Notify the public about the availability of accessible formats and communication supports.

Website Accessibility:

The Township of Cavan Monaghan website conforms with World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. By January 1, 2014, any new web content will conform with WCAG 2.0 Level A. By January 1, 2021 all internet website and web content will conform with WCAG 2.0 Level AA.

Education, Training and Materials:

Public Libraries:

- Public Libraries shall provide access to or arrange for the provision of access to accessible materials where they exist.
- Public Libraries shall make information about the availability of accessible materials publicly available and shall provide information in accessible format or with appropriate communication supports, upon request.
- Public Library Boards may provide accessible formats for archival materials, special collections and rare books.

Employment Standards:

The Employment Standard builds upon the existing requirements under the Ontario Human Rights Code in relation to how to accommodate individuals with disabilities throughout the job application process and the employment relationship. It applies with respect to employees and does not apply to volunteers and other unpaid individuals. The requirements of the Employment Standard shall be met by the Township of Cavan Monaghan by January 1, 2014 unless otherwise specified.

Recruitment and Retention:

We shall notify employees and the public about the availability of accommodations for applications with disabilities:

- During the recruitment process when job applicants are individually selected to participate in an assessment or selection process;
- If a selected applicant requests an accommodation that takes into account the person's accessibility needs.

Employee Notification:

The municipality shall inform its employees of its policies used to support its; employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability:

- As required to new employees as soon as practicable after they begin their employment.
- Whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

Accessible Formats:

In addition and where an employee with a disability requests it, we will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform the employee's job.
- Information that is generally available to employees in the workplace.
- Consultation with employees making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plan:

We shall have in place a written process for the developing of a documented individual accommodation plan for employees with a disability. Process to include:

- The employee's participation in the development of the IAP;
- Assessment on an individual basis;
- Identification of the accommodations;
- We may request an evaluation by an outside medical or other expert at our expense, to assist with determining accommodation and how to achieve accommodation.
- Employees may request the participation of a representative from his/her bargaining agent, where represented, or otherwise a representative from the workplace where an employee is not represented by a bargaining agent;
- Steps taken to protect the privacy of the employee's personal information;

- Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- If denied, the reasons are to be provided to the employee;
- A format that takes into account the employees disability needs;
- If requested, any information regarding accessible formats and communication supports provided;
- Identification of any other accommodation that is to be provided.

Return to Work:

The Township of Cavan Monaghan will have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes must be documented and must outline the steps that the Township will take to facilitate the return to work and include an Individual Accommodation plan.

Performance Management, Career Development and Advancement, Redeployment:

The Township of Cavan Monaghan will take into account the accommodation needs and/or individual accommodation plans of employees when:

- Using performance management processes;
- Providing career development and advancement information;
- Using redeployment procedures.

Workplace Emergency Response Information:

The Township of Cavan Monaghan shall provide individualized workplace emergency response information to employees who have a disability:

- If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability;
- If the employee who receives an individual workplace emergency response information requires assistance and with the employee's consent, the Township will provide the workplace emergency information to the person designated by the Township to provide assistance to the employee;
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;
- Review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodation needs or plans are reviewed and when the employer reviews its general emergency response policies.