

## MISC Secretariat

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### Re: Draft Ontario Public Service (OPS) 2026–29 Multi-Year Accessibility Plan

Thank you for the opportunity to review and provide feedback on the draft Ontario Public Service (OPS) 2026–29 Multi-Year Accessibility Plan (MYAP). AMAPCEO has conducted a detailed review of the draft plan and related contextual materials. Our analysis identifies several areas where clearer commitments, stronger accountability, and closer alignment with operational realities would significantly improve the plan's effectiveness.

In responding to your invitation to provide feedback AMAPCEO undertook discussions of our own with our members through our Disability Caucus and our professional staff.

Across all areas, the draft MYAP demonstrates strong intentions; however, persistent gaps in culture, consistency, accountability, and the lived experience of employees with disabilities continue to limit progress. Key themes emerging from our review include:

- Accessibility continues to be addressed reactively rather than proactively.
- Significant cultural and systemic barriers persist in recruitment, accommodation processes, and digital communication.
- Current approaches lack an intersectional lens and do not sufficiently consider disability-specific or mental-health-related needs.
- Accountability structures and mechanisms to ensure consistent alignment across policies are not clearly defined.

In addition, recent Return-to-Office (RTO) requirements have negatively affected employees' sense of trust, inclusion, and psychological safety. Women, racialized employees, and employees with disabilities disproportionately experience increased affordability challenges, commuting-related strain, and workplace stress. RTO may also interfere with renovation schedules and delay planned accessibility improvements across OPS workplaces.

For ease of reference, we have prepared a separate attached document that outlines:

- Shortcomings in engagement, consultation, and continuous feedback mechanisms

- Persistent barriers in disability accommodation processes and workplace culture
- Challenges in recruitment, representation, and career advancement for employees with disabilities
- Gaps in digital accessibility, communications practices, and system usability
- Ongoing concerns related to mental health, psychological safety, and return-to-office impacts
- Missing integration of intersectionality within accessibility planning and policy alignment
- Needed improvements in facilities, inclusive design processes, and procurement standards

We reiterate that AMAPCEO has provided similar recommendations and voiced the same concerns to the OPS employer on earlier versions of MYAP. We therefore urge the employer to review both the enclosed document and AMAPCEO's [Submission on the OPS Multi-Year Accessibility Plan \(MYAP\), January 2022](#).

We respectfully submit this feedback to support the continued refinement of the MYAP and to help ensure that OPS employees with disabilities experience meaningful, timely, and sustained improvements in accessibility, inclusion, and workplace equity.

We appreciate the opportunity to contribute to this important work and look forward to ongoing collaboration as the plan advances.

Sincerely,



Dave Bulmer  
President & CEO



Cynthia Watt  
Vice-President & Chair, Equity Committee

cc:

Donna-Mae Robinson, Director, Centre of Excellence for Human Rights and Employee Experience, People and Culture Division, Centre for People, Culture and Talent, TBS

Ben Rosssiter, Team Lead, Labour Relations, and Bargaining, AMAPCEO

Sangeeta Boondoo, Labour Relations Specialist, AMAPCEO

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# **Analysis of Gaps in the Draft 2026-29 OPS MYAP**

The draft 2026–2029 MYAP shows progress in several areas—especially leadership accountability, data strategy, digital accessibility updates, and service delivery innovations. However, when compared to the feedback received by AMAPCEO and AMAPCEO member experiences there are notable gaps outlined below especially around:

## **Strengthen Employee Voice and Engagement**

The draft refers to an engagement framework for employees with disabilities but does not include AMAPCEO’s request for ongoing lived-experience input and therefore should establish formal mechanisms—such as quarterly co-design panels—and commit to using employee feedback to continuously revise and improve the MYAP.

The consultation process for the draft MYAP is overly centralized and does not meaningfully include staff-level employees or line ministries. The Disability Advisory Council was inactive for 18 months, and there is a need for structured, ongoing engagement with bargaining agents.

## **Disability Accommodation Reform**

AMAPCEO’s major concerns that the disability accommodation process is not trauma-informed and lack accountability mechanisms for managers are not directly addressed. Member’s experiences of the process show that it is an adversarial, retraumatizing accommodation process which has inconsistent outcomes and is not bias free. Remove stigmatizing language in accommodation letters.

The organizational climate discourages employees from disclosing their disabilities, and some managerial practices are perceived as intimidating or ineffective. Employees experience Disability Accommodation Specialist (DAS) practices as employer-centric and adversarial, and the required forms—such as the REHIF and HIQ—are inconsistent, invasive, and paired with unrealistic timelines. Additionally, there are notable policy gaps related to chronic and episodic disabilities.

## **Recruitment and Representation**

Whilst the draft MYAP identifies Hiring Manager Education Sessions on Inclusive Recruitment and Labour market engagement strategy to increase representation. Inclusive recruitment is identified as a positive development, but there are concerns about the reduction in professional development opportunities for employees with disabilities. Additionally, systemic cultural issues continue to affect the career progression of employees with disabilities.

AMAPCEO recommends that there needs to be a full audit of systemic recruitment barriers, a commitment to proactively accessible interview options and recruitment procedures which explicitly do not require applicants to disclose disability early in the process.

## **Digital Accessibility and Inclusive Communications**

The draft MYAP focuses on digital tools but omits cultural behaviour change and training requirements. Mandatory accessible-communications training is needed for all OPS employees. All digital tools should be accessible by default e.g. automatic captioning and accessibility practices should be established enterprise wide.

The draft MYAP also needs to distinguish between public facing accessibility and employee facing accessibility, these are not identical and require different approaches. It also risks emphasizing only physical disabilities and should explicitly recognize mental health, neurodiversity, and chronic illness, while also providing concrete examples of culture change and addressing challenges such as digital tool friction, restrictive communications policies, and limited flexibility for non-traditional work patterns.

Digital system friction and restrictive communication policies are creating barriers for employees. HRWIN, the expenses platform, and other internal systems need modernization. Chatbots can be helpful, but they should supplement rather than replace human support. Communication practices must also respect non-verbal communication preferences and the diverse communication styles of neurodiverse employees.

## **Mental Health & Psychological Safety**

The draft MYAP emphasizes psychological health and safety culture but does not address significant mental health failures. Member experiences point to a continued minimising/dismissal of mental health accommodations by managers and disability accommodation specialists continue to be an issue. An improved MYAP would include commitments to specialized training for accommodation specialists and managers on mental health bias, stigma and accommodation as they are needed. The integration of mental health obligations into performance metrics is also needed.

Psychological safety concerns persist due to workplace culture, the pressures around disability disclosure, and certain managerial behaviours. The Return-to-Office direction is also affecting employees' sense of trust, inclusion, and psychological safety. In addition, employees have expressed a need for interactive mental-health workshops rather than relying solely on online training modules.

## **Intersectionality**

The draft MYAP does not reference intersectionality, despite AMAPCEO identifying it as a critical gap, and therefore the plan should establish intersectionality as a core principle, require its integration into accommodations, policy design, and HR processes, and ensure cross-linkages with the Anti-Racism Policy, inclusive workplace policies, and Policy on Preventing Barriers in Employment (PPBE).

## **Policy Integration & Alignment**

The draft MYAP fails to show how it aligns with broader diversity, accessibility, inclusion and respectful (DAIR) strategies or the Leadership Pledge, despite AMAPCEO warning about the risks of siloed or conflicting policies, and therefore should commit to developing a cross-policy integration map, ensuring all accessibility commitments align with DAIR, Anti-Racism, and the Mental Health Framework, and requiring ministries to report annually on alignment across policy areas.

## **Facilities & Inclusive Design**

The draft references accessible building standards but omits AMAPCEO's call for periodic guideline reviews and stronger internal expertise and therefore should include a scheduled review cycle for barrier-free design guidelines (e.g., every three years), develop internal OPS inclusive-design expertise instead of relying solely on external consultants, and establish clear inclusive-design competency targets for the Ministry of Infrastructure.

## **Procurement & Transfer Payments**

The draft emphasizes deploying the Accessibility in Procurement Toolkit but omits key issues flagged by AMAPCEO—such as workload, training, universal-design purchasing, and unresolved transfer-payment requirements—and therefore should commit to mandatory procurement-accessibility training, provide workload and staffing supports, adopt universal design as the default procurement standard, and finalize the integration of accessibility requirements into transfer-payment processes.