Amtrak Accessibility Plan (Initial) – Accessible Canada Act (ACA)

Accessibility Plan with Feedback Process

Accessible Transportation Planning and Reporting Regulations (ATPRR) Initial Accessibility Plan due: June 1, 2023

Progress Report due: June 1, 2024

General

Introduction

Amtrak's Accessibility Plan – Accessible Canada Act (ACA) has been established based on the recommendations of ACA's new regulations, Accessible Transportation Planning and Reporting Regulations (ATPRR). The purpose of the Accessible Canada Act is to make Canada barrier-free by January 1, 2040. This involves identifying, removing, and preventing barriers in federal jurisdiction in the following priority areas:

- employment
- the built environment (buildings and public spaces)
- information and communication technologies
- communication, other than information and communication technologies
- the procurement of goods, services, and facilities
- the design and delivery of programs and services, and
- transportation

For feedback on the accessibility plan, accessibility plan implementation, and opportunities for improvement or alternate format requests of the accessibility plan and description of the feedback process, please contact the Amtrak ADA Coordinator, Amtrak Law Department, 1 Massachusetts Avenue, NW, 20001, (202)-906-3000, or by emailing AccessibilityOffice@Amtrak.com.

For accessibility-related inquiries related to customer accommodations and services, please contact Amtrak Customer Relations, 1-800-USA-RAIL (1-800-872-7245), TTY: 1-800-523-6590, or send us an e-mail. Amtrak will accept feedback that is provided anonymously and will acknowledge receipt of feedback, other than anonymous feedback, in the same manner in which it was received.

Background

The Accessible Canada Act (ACA) and the Accessible Canada Regulations (regulations) require that federally regulated entities prepare and publish accessibility plans. The ATPRR were created under the authority of the ACA. The ATPRR support the accessibility of the federal transportation network by setting out requirements relating to planning, reporting, and feedback processes for transportation service providers (TSPs), such as Amtrak as a Class 2 provider, in order to identify and remove any barriers (and prevent new barriers).

Respectfully, it is important to note that the U.S. Department of Transportation (DOT) is designated under the Americans with Disabilities Act of 1990 (ADA) as generally responsible for compliance and regulatory activities relating to transportation in the U.S.1 DOT's sub-agency, the Federal Railroad Administration (FRA), oversees Amtrak and administers federal financial assistance to Amtrak and is tasked with overseeing Amtrak's capital projects and reviewing Amtrak's compliance with the ADA. In addition, the ADA authorizes the Department of Justice (DOJ) to retain jurisdiction to investigate complaints, and DOJ, in fact, has exercised that authority.2 Amtrak has worked with the DOT, FRA, DOJ, and Amtrak Office of the Inspector General (OIG) to ensure continued progress and compliance with ADA requirements.

Executive Summary

Amtrak conducted a holistic assessment of key areas of its operations, which was informed by general feedback from employees and customers with disabilities, as well as the broader disability community. Amtrak closely monitors feedback from customers with disabilities as provided through accessibility complaints and other feedback received to identify trends, opportunities for improvement, and appropriate modifications or actions. These methods for obtaining input have helped Amtrak address potential barriers and opportunities for improvement. Amtrak also meets quarterly with disability community representatives and hosts ad hoc meetings, as needed, to discuss specific topics or respond to requests from disability community representatives.

Amtrak’s accessibility programs report out monthly to Amtrak’s executive leadership, as well as the DOT, FRA, and the DOJ. Amtrak's progress reports include updates on station renovations, modifications to rolling stock, policy changes, and customer service enhancements. Amtrak is pleased to comply with the Canadian Transportation Agency’s request for this initial accessibility plan and share its recommended actions, as well as respond to any feedback about its contents.

Accessibility Statement

Amtrak is committed to providing accessible, practical, inclusive, and safe experiences to accommodate our passengers with disabilities. Amtrak welcomes feedback from current and prospective customers and employees with disabilities as well as the broader disability community, so that Amtrak may identify opportunities to improve and exceed expectations through innovative technology, evolving policies, and equitable customer experience, and continue to strengthen its accessibility programs, services, and culture.

As federal accessibility regulations continue to evolve to best accommodate persons with disabilities, Amtrak will continue to adapt, monitor trends, and apply best practices. Amtrak strives to continuously improve its accessibility services by advancing initiatives, available technology, and achieving inclusive and equitable outcomes to ensure our passengers with

[1] 42 U.S.C. § 12133; 28 C.F.R. § 35.190(6)(8)
[2] See 28 C.F.R. Part 35, Subpart F

disabilities have the most integrated and positive experience, especially as Amtrak enters a new era of modernization and growth.

Areas Described under Section 5 of the ACA

Employment

While Amtrak does not have any employees based in Canada, the following information is provided regarding Amtrak's compliance with the ADA and activities with respect to its employees and applicants.

Reasonable Accommodations

- *Current State:* Amtrak maintains a robust reasonable accommodations process for its employees that complies with the ADA. Amtrak aims to continue training managers on the requirements under the ADA and Amtrak's procedures for assisting employees who may require a reasonable accommodation.
    - *Future State:* Materials are being developed for managers to receive additional guidance to ensure understanding of the reasonable accommodations process. Training materials are currently being reviewed and will be available in 2023.

Talent Acquisition:

- *Current State:* Amtrak periodically reviews its new employee recruitment communications, so that they stress our values of diversity and inclusion, ensure inclusive language, promote career opportunities for persons with disabilities, and provide information regarding how to request accommodations.
    - *Future State:* Ensure disability-inclusive language in job descriptions and postings are streamlined across the company by using Amtrak's Disability Language & Etiquette Guide and other best practices. This project includes a regular cadence of meetings between Diversity Recruiting and Recruitment Marketing to ensure that changes are made and sustained.
- Current State: There is opportunity to bring in more talent with disabilities and to capture accurate information about disability representation at different employment levels.
    - Future State: Work with Amtrak Talent Acquisition representatives so that they continue to proactively engage disability networks, use inclusive language, and address reasonable accommodation questions during the recruitment interview process and beyond. This will involve efforts such as recruiter education, including having information sessions on managing accommodation requests during the recruitment process. Diversity Recruiting will partner with HR Analytics to ensure that disability representation is tracked and reported on a regular basis.

- Current State: Recruitment and onboarding materials/process need to be reviewed to optimize accessibility.
    - Future State: The Diversity Recruiting team will collaborate with the Accessibility Office/subject matter experts to assess the accessibility of current materials/process and implement any recommendations or improvements to enhance inclusion.

Diversity, Inclusion & Belonging

- *Current State:* There is opportunity to capture more accurate current employee disability representation at different employment levels and include in the annual Diversity Report.
    - *Future State:* The Diversity, Inclusion & Belonging team is working to launch a self-ID campaign for employees with disabilities in 2023. The campaign will also help ensure that individuals can self-identify to receive prioritized assistance during an emergency.

Built Environment

Stations

The following describes Amtrak's efforts with respect to making the U.S. stations for which it has responsibility accessible and compliant with the ADA. Amtrak does not have responsibility for the accessibility of the Canadian stations it serves.

- *Current State:* Stations, or the components of stations for which Amtrak has accessibility responsibility and ownership, e.g., station building, passenger platform, and parking, are in the process of being brought into compliance with ADA requirements, as quickly and as efficiently as possible, to provide the best possible service to our passengers with disabilities.
    - *Future State:* Amtrak has developed and implemented a robust multi-year program, Americans with Disabilities Act Stations Program (ADASP), to achieve accessibility compliance with station construction projects scheduled through 2029 and station design projects scheduled through 2026. As of close April 2023, there are 387 stations where Amtrak has some type of responsibility for ADA compliance. Currently there are 179 stations compliant (110 where Amtrak has responsibility for some or all components and 69 stations excluding platforms). Amtrak meets monthly with the DOT and FRA to report on its progress and identify any risks. The nine (9) stations in Canada are not included in the ADASP since Amtrak does not have any ownership or responsibility.
- *Current State:* At some stations, the vertical and horizontal gap between the train car floor and the platform edge poses a challenge to some passengers with reduced mobility and who may rely on a wheeled mobility device.

- *Future State:* Amtrak has a research and development Accessible Boarding Technologies (ABT) program that focuses on improving passenger movement between Amtrak trains and station platforms. After analyzing onboard ramps and station-based bridge plates, the ABT team suggested significant improvements to their design to add length, reduce slope, and incorporate new durable and lightweight materials. Thus far, all of the initial 330 bridge plate deployments (of 330) have been completed along the Northeast Corridor (NEC). More deployments are planned for the NEC and level boarding platforms across the National Network. Currently, the ABT team is in the process of deploying new improved ramps with modified strap handles designed and tested to assist Amtrak Onboard Service employees with moving and deploying the ramps. Additional work is being done to manufacture ramp storage inserts on the Superliner II Sleeper Cars, as well as manufacture and test prototypes of storage inserts for the remaining Superliner I and II Coach Cars and Surfliner Cars. Amtrak is also working with a manufacturer to update the design of the Downeaster bridge plates. All work is expected to be complete by September 2025.

Facilities/Offices

- *Current State:* There may be opportunities to further assess office spaces for employees with disabilities who either work or travel to the site locations.
  - *Future State:* Ensure that existing offices and offices in redevelopment are compliant with regulations and that fulfillment of requests for reasonable modifications of the built environment can be made within a reasonable timeframe, e.g., power-operated doors, accessible restrooms.

Information and Communication Technologies (ICT)

eCommerce

- *Current State*: There may be opportunities for a more intuitive booking flow on Amtrak.com.
  - *Future State:* Amtrak is in the process of identifying best practices, including feedback from disability advocates, and applying them to the redesign of the booking process to implement by August 2023. A primary improvement with the new User Experience (UX) design is that there will be more description and media of accessible bedrooms, other onboard accommodations, and station equipment designed to help passengers with disabilities so that they can better prepare and plan their travel.
- *Current State*: Amtrak's digital channels, Amtrak.com, station kiosk, and the Amtrak mobile device application, allow passengers with disabilities to book travel and request assistance when making a reservation. Nevertheless, there are some limitations when a passenger uses a self-service channel to make certain changes to their reservation.
  - *Future State:* Amtrak is working to close the gaps and ensure our digital channels support all reservation types (one-way, round trip, multi city, multi ride, rail pass). In July 2022, Amtrak enhanced its digital channels to support reservations with more than one passenger traveling with a disability. This year, Amtrak plans to enhance its digital channels so that passengers with a disability can make broader changes to a reservation online. Currently, a customer service representative must make certain changes to a reservation for a passenger with a disability or who requests assistance.

Digital Technology

- *Current State:* Improving the process to design and enhance testing to ensure that

accessibility issues are addressed before any releases and adhere to Web Content Accessibility Guidelines (WCAG) 2.0 AA.

- *Future State:* Amtrak is actively partnering with a digital accessibility vendor in 2023-2024 to include user experts who are blind or low vision and use screen reading assistive technology in testing efforts to fix any identified inaccessible features before release. Amtrak also has internal resources and user experts to test for accessibility issues. In addition to manual testing, Amtrak purchased from UsableNet an automated tool called AQA as a supplemental resource and initial scanning feature to help identify gaps in the development phase using WCAG 2.0 AA guidelines.

Communication (other than ICT)

- *Current State:* There are opportunities for Communications teams to ensure announcements and events are accessible and use inclusive language and different types of media and images.
  - *Future State:* Apply internal documents created by the Amtrak Accessibility Office, e.g., the Disability Language & Etiquette Guide and the Accessibility Events Checklist, to ensure accessible and inclusive communications and events.

Procurement of goods, services, and facilities

- *Current State:* There are opportunities to improve the procurement processes and make them more accessible, as well as ensuring vendor accountable for accessibility compliance and best practices.
  - *Future State:* Ensure inclusive language in the procurement documents, e.g., Request for Proposal, Scope of Work, etc., and require that vendors confirm how they applied accessibility standards to their final product. When applicable and necessary to do so, ensure that feedback from the disability community representatives has been solicited and incorporated to the extent possible.
  - *Future State:* Improvements to Amtrak procurement processes have been underway allowing ADASP projects to move faster toward award and ultimately toward completion. The ADASP project work is divided into five (5) phases: survey, assessment, design, construction, and post-assessment (occurring after the project is completed).

Design and delivery of programs and services

- *Current State:* There are opportunities to make the design and delivery of programs and services more accessible and inclusive through applying best practices and lessons learning from previous projects.
  - *Future State:* Amtrak senior leaders regularly meet with the FRA staff to provide progress reports on Amtrak's delivery of programs and services for customers with disabilities. The Amtrak Accessibility Office (AO) continues to encourage leaders of programs and services to build in accessibility best practices from the start by incorporating feedback from the disability community representatives and subject matter experts, as well as feedback from customers with disabilities collected through complaints and surveys. AO has conducted a holistic assessment of policies, modifying and developing procedures toward more efficient streamlining of services to

accommodate passengers with disabilities. Amtrak also continues to increase station staffing and improve communication between train crews and station staff to fulfill Meet and Assist (MAAS) requests using e-ticketing Mobile Devices (eMDs) that have been distributed more broadly.

- *Future State:* Accessibility training is integral to ensuring Amtrak's stations, trains, and services are accessible for passengers with disabilities, including through communications and accommodations. Currently, a disability-led and owned vendor facilitates a robust training program for customer-facing staff. Amtrak shares feedback from customers with disabilities and addresses areas for improvement or reinforcement of policy during training. Feedback from employees attending the training, in regard to interactions and observations in stations and on board the trains assisting customers with disabilities, is also collected to help determine additional areas for improvement or where further clarification may be necessary in communications and policies.

Transportation

- *Current State:* There are opportunities to add accessible features to existing rolling stock. *Future State: The* Mechanical team is in the process of installing a newly designed accessible restroom in 23 of the Superliner I coach cars. Amtrak worked with representatives from the disability community, U.S. Access Board, and FRA to create this new accessible restroom design. The car will be presented to the representatives on June 13, 2023. The rollout will continue through the first quarter of Fiscal Year 2025 (October 2024 – January 2025).
  - *Future State:* Amtrak identified and is in the process of executing twelve (12) improvement efforts for more accessible rail cars. Examples include the addition of slip-resistant flooring, stair railings and handrails, folding tray tables, Superliner accessible bedroom handrail layout, evacuation chairs, Viewliner II sink extensions, compliant service counters, and attendant call buttons. All efforts are in progress, with the exception of the attendant call button in the accessible sleeper room, which is in research and development.

Provisions of CTA accessibility-related regulations

Per CTA's Accessible Transportation for Persons with Disabilities Regulations (ATPDR) requirements for foreign rail carriers, Amtrak will follow the requirements below.

Part 1 – Requirements Applicable to Transportation Service Providers: Amtrak must follow section 5(a) concerning information to be published. Specifically, they must publish a notice that they are subject to the ATPDR and stating the provisions that apply to them.

Amtrak's Accessibility Plan (Accessibility Canada Act) will be published on the Accessible Travel Services and Freedom of Information Act (FIOA) pages, in addition to the annual progress updates in June.

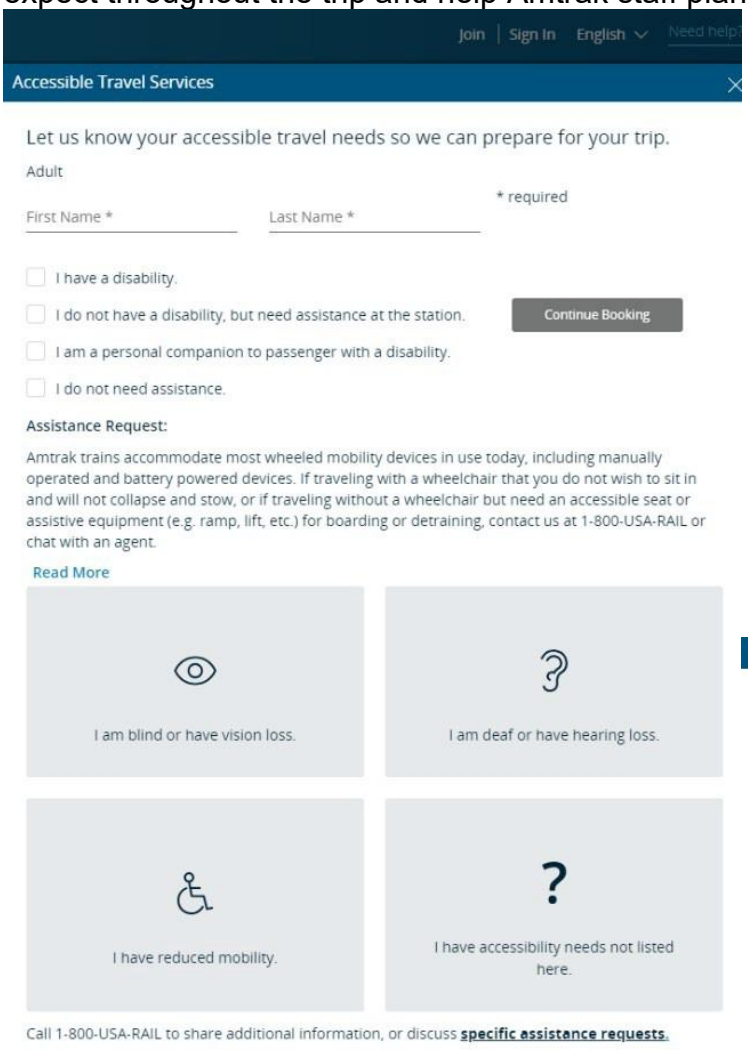
Part 2 – Service Requirements Applicable to Carriers – Amtrak must provide the services set out in Part 2 of the ATPDR, with certain exceptions.

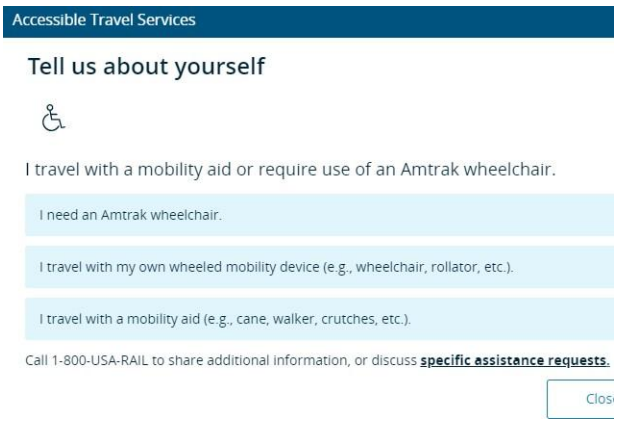
Section 35 – Services to provide on request:

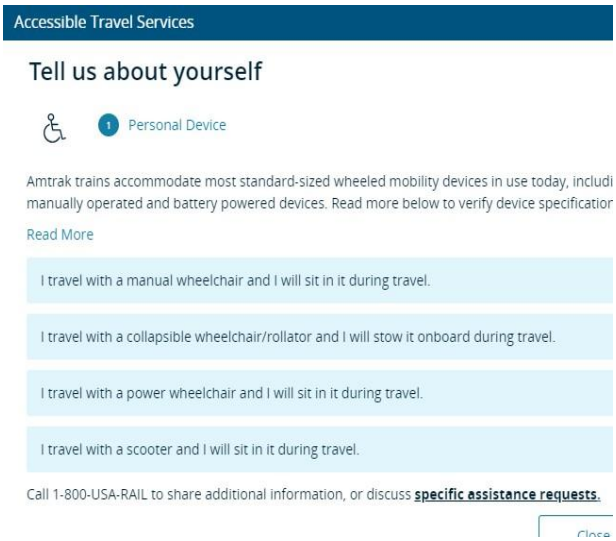
Amtrak provides services and accommodations listed on the *Accessible Travel Services* page and makes every effort to accommodate reasonable requests from passengers with disabilities as

needed and when possible if outside of policy. Amtrak surveys and collects feedback from passengers with disabilities and disability organization representatives, in addition to employees with disabilities, and customer-facing employees who work directly with passengers with disabilities. Amtrak's Accessibility Office works with key stakeholders to proactively monitor and resolve accessibility complaints, identify solutions (e.g. review, modify, create procedures and policies), and implement best practices.

Passengers with disabilities or who have assistance requests prior to their trip have an option to share their requests through an accessibility booking questionnaire (pictured below), or through contacting Customer Relations. This can help the passenger prepare and better understand what to expect throughout the trip and help Amtrak staff plan for scheduling,







availability, and fulfilling the requests of the passenger. Amtrak continues to improve this process by conducting user interviews for people with disabilities and applying feedback and modifications. Continued efforts are being made to better integrate the accessible services and train features provided on the *Accessible Travel Services* page with the booking flow, also providing more disability representation on the website. Passengers can make accessible travel requests on-demand as well.

Section 40(1) – Duty to transport a mobility device

Amtrak accommodates passengers who use wheeled mobility devices and mobility aids. Additional information is provided about wheeled mobility device services, wheelchair dimensions, and meal services for passengers with disabilities. As Amtrak continues to improve accessibility at stations, onboard trains, and boarding and alighting, passengers will have a more accessible path of travel.
Sections 50(2), 51(4), 52 – Duty to provide additional space free of charge

When making reservations for passengers with disabilities, with sufficient advance notice (at least 14 days) and the availability of space, equipment, and other necessary resources, Amtrak provides additional space free of charge for passengers traveling together who use wheeled mobility devices and wish to be seated together while remaining in their wheelchairs. If a request cannot be fulfilled, Amtrak will make reasonable efforts to provide alternative accommodations.

Service animals trained to perform a specific task for the benefit of a disability must sit under the passenger's seat or at their feet. Amtrak does not provide additional free space for service animals. Service animals are not allowed to sit in the aisle, on the seats or on beds.

Consultations

Amtrak has a robust community outreach program with a variety of disability advocacy groups that represent persons with disabilities. Amtrak senior managers and executives meet with advocacy groups at least once a quarter to discuss accessibility plans, the prevention and remediation of any barriers, and any operational concerns or other feedback from the groups. In addition to the quarterly meetings, Amtrak hosts ad hoc meetings on specific topics as needed to get input, as well as invites disability community representatives and affiliates to interactive design mockups and tours of new fleets to share feedback on the design, equipment, and overall experience with the goal of providing a better and more integrated experience for future passengers with disabilities.

Furthermore, the Amtrak accessibility programs stay in contact with stakeholders in rail travel, as well as participate in disability conferences, often asking for specific ideas and input regarding certain policies that affect passengers with disabilities.

Amtrak provides access to many of its executives and officers at an annual July board of directors meeting that is designed to specifically explore and discuss issues that passengers with disabilities face. Amtrak believes that stakeholder dialogue at all levels is vital to providing accessible and meaningful rail travel now and in the future.