

Amtrak Accessibility Plan & Progress Report – Accessible Canada Act (ACA)
Accessibility Plan with Feedback Process
Accessible Transportation Planning and Reporting Regulations (ATPRR)
Initial Accessibility Plan: June 1, 2023
Progress Report: 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, <u>Accessible Transportation Planning and Reporting Regulations (ATPRR)</u>. The purpose of the <u>Accessible Canada Act</u> 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 <u>send us an e-mail</u>. Amtrak will accept anonymous feedback and acknowledge receipt of feedback, other than anonymous feedback, in the same way it was received.

# **Background**

The Accessible Canada Act (ACA) and the <u>Accessible Canada Regulations</u> (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, 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 subagency, 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. The FRA has an Office of Civil Rights that works with Amtrak and independently investigates complaints in connection with Amtrak services. The ADA also authorizes the Department of Justice (DOJ) to retain jurisdiction to investigate complaints, and DOJ has exercised that authority.² Amtrak continues to work 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 conducts a holistic assessment of key areas of its operations on an ongoing basis, which is informed by the Amtrak Accessibility Office and other subject matter experts, 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, respond to requests from disability community representatives, or conduct user testing.

Amtrak's accessibility programs report out monthly to Amtrak's executive leadership, as well as the DOT, FRA, and DOJ. Amtrak's progress reports include updates on station renovations and improvements, modifications to rolling stock, policy changes, and customer service enhancements. Amtrak is pleased to comply with the Canadian Transportation Agency's request for this accessibility plan and progress report 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, toward identifying opportunities to improve and exceed expectations through innovative technology, evolving policies, and equitable customer experience. Amtrak continues to strengthen its accessibility programs, services, and culture.

As federal accessibility regulations evolve to best accommodate persons with disabilities, Amtrak will continue to adapt, monitor trends, and apply best practices. Amtrak strives to

<sup>&</sup>lt;sup>1</sup> 42 U.S.C. § 12133; 28 C.F.R. § 35.190(6)(8)

<sup>&</sup>lt;sup>2</sup> See 28 C.F.R. Part 35, Subpart F



continuously improve its accessibility services by advancing initiatives, available technology, and achieving inclusive and equitable outcomes to ensure our passengers with 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

- Initiative: 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.
  - Progress/Future State: In 2024, Amtrak started launching both in-person and virtual training for managers to provide a better understanding of their roles and responsibilities under the ADA, prioritizing departments that have received the most requests for accommodations by employees.

# Talent Acquisition:

- *Initiative:* Amtrak annually reviews its employee recruitment communications to stress its values of diversity and inclusion, ensure inclusive language, promote career opportunities for persons with disabilities, and provide information regarding how to request accommodations.
  - Progress/Future State: Amtrak continues to strive toward ensuring that job
    postings reflect disability-inclusive language by promoting the Amtrak Disability
    Language & Etiquette Guide throughout the company and incorporating other
    best practices. A disability inclusive hiring best practices guide is being
    developed and will be completed in 2024.
- Initiative: Opportunity to recruit and attract more talent with disabilities.
  - Progress/Future State: Amtrak continues to identify opportunities to proactively engage disability networks, use inclusive language, and address reasonable accommodation questions during the interview process and beyond. This involves efforts such as recruiter education, including having information sessions on managing accommodation requests during the recruitment process.



In summer 2023, Amtrak representatives participated in the Deaf Employment Summit and a career fair at the National Technical Institute for the Deaf in Rochester, NY. Amtrak is exploring additional opportunities to expand recruitment at other disability career events to attract talent with disabilities.

- Initiative: Opportunity to review recruitment and onboarding materials/process to optimize accessibility.
  - Progress/Future State: The Diversity Recruiting team is collaborating with the Accessibility Office (AO) and Digital Technology team to assess the accessibility of current materials/process and implement any recommendations or improvements. Materials must be checked for visual and digital accessibility in accordance with Web Content Accessibility Guidelines (WCAG), Version 2.1, Level AA.

# Diversity, Inclusion & Belonging

- *Initiative:* Opportunity to capture more accurate current employee disability representation at different employment levels and include it in the annual Diversity Report.
  - Progress/Future State: The Diversity, Inclusion & Belonging team is working to launch a self-ID campaign for employees with disabilities through a newly streamlined employee portal that will be available in 2024. The campaign will also aim to streamline employee assistance requests in the event of an emergency.

### **Built Environment**

### **Stations**

The following section 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.

- Initiative: 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.
  - Progress/Future State: Amtrak has developed and implemented a robust multiyear 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 May 2024, there are 380 stations where Amtrak has some type of responsibility for ADA compliance, of which 191 stations are compliant (124 where Amtrak has responsibility for some or all components and 67 stations excluding



- platforms). Amtrak meets monthly with the 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.
- Initiative: Amtrak has a research and development program, Accessible Boarding
  Technologies (ABT), that focuses on improving passenger movement between Amtrak
  trains and station platforms. 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.
  - o Progress/Future State: After analyzing onboard ramps and station-based bridge plates, the ABT team suggested significant improvements to equipment designs to add length, reduce slope, and incorporate new durable and lightweight materials. Thus far, all 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. As of May 2024, 135 Superliner ramps have been deployed. Additional work is in progress 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 also worked with a manufacturer to update the design of the bridge plates used on the Downeaster route and manufactured 20 bridge plates specific to the route.

#### Facilities/Offices

- Initiative: Opportunity to further assess existing and new office spaces and implement best practices in the most integrated setting for employees with and without disabilities.
  - Progress/Future State: Amtrak continues to 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.
    - In 2024, Amtrak incorporated a stronger accessibility scope of work for the *Detailed Conditions Assessment, State of Good Repair Report, and 5-Year Capital Plan for the Philadelphia Customer Call Center* that supports 500+ dedicated employees, as well as employees visiting from other sites. This included recommendations of power-operated doors at entrances, exits, restrooms, and other staff areas where permissible; designated sensory-friendly quiet spaces, etc.



# Information and Communication Technologies (ICT)

#### *eCommerce*

- *Initiative*: Opportunity for a more intuitive and accessible booking process on Amtrak.com.
  - Progress/Future State: Amtrak regularly conducts user testing and collects feedback from individuals with disabilities toward identifying best practices and applying them to the redesign of the booking process. In summer 2023, Amtrak enhanced the online booking flow to allow for more informative media and language to be included for single and multi-segment trips with varying capabilities to provide passengers with disabilities a better understanding of what to expect before they travel. Amtrak is in the process of identifying improvements to the online assistance questionnaire based on feedback from individuals with disabilities, so it is easier to access and more intuitive to navigate.
- Initiative: 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.
  - Progress/Future State: Amtrak is working to close gaps and ensure its digital channels support all reservation types (one-way, round trip, multi city, multi ride, rail pass). In September 2023, Amtrak enhanced its digital channels to allow reservations with passengers with disabilities to self-modify their reservations. In 2024, Amtrak implemented an enhancement for customers to identify more than one disability when self-booking reservations on the digital channels. Additional projects planned for 2024 include enhancing the assistance questionnaire on the digital channels, so passengers with disabilities can communicate broader assistance needs online without calling an agent. The focus is to prioritize relevant and critical accessibility information in the booking flow for passengers with disabilities and to provide a more intuitive and user-friendly experience.

# Digital Technology

- *Initiative*: Develop a plan to ensure that digital channels and communications adhere to Web Content Accessibility Guidelines (WCAG) 2.1, Level AA by April 24, 2026.
  - Progress/Future State: Amtrak partners with a digital accessibility vendor 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 response to the publication of the DOJ's final rule on website accessibility, Amtrak is developing an implementation plan to ensure compliance for digital channels and communications.

# Communication (other than ICT)

- *Initiative:* Opportunity to ensure announcements and events are accessible and use inclusive language and alternative types of media, images, and descriptions.
  - O Progress/Future State: Amtrak continues to apply best practices to ensure accessible and inclusive communications and events through. Internal guides have been developed by the Accessibility Office, e.g., Amtrak Disability Language & Etiquette Guide, Amtrak Accessibility Events Checklist, etc. with an accessibility social media guide in development. Accessibility language has been added to the community outreach scopes for capital delivery projects, such as the Frederick Douglass Tunnel Program.
  - Disability outreach is conducted for accessibility improvement ribbon-cutting ceremonies at stations and other events to increase representation and community engagement. Amtrak has added more clarifying language and images of authentic disability representation to the website and continues to expand this initiative.

# Procurement of goods, services, and facilities

- Initiative: Opportunity to improve the procurement processes and make them more accessible, as well as ensuring vendors are accountable for accessibility compliance and best practices.
  - Progress/Future State: Amtrak continues to ensure inclusive language in 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, internal stakeholders ensure that feedback from the disability community representatives has been solicited and incorporated to the extent possible. The Procurement Office has expanded its distribution lists to include disability-owned vendors. The Office will continue to expand its outreach.
  - Progress/Future State: Improvements to Amtrak procurement processes remain underway allowing ADASP projects to move faster toward award and ultimately, completion. The ADASP project work is divided into five (5) phases: survey, assessment, design, construction, and post-assessment (occurring after construction is completed).



### Design and delivery of programs and services

- Initiative: Opportunity to make the design and delivery of programs and services more accessible and inclusive through applying best practices and lessons learned from previous projects.
  - Progress/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 AO continues to encourage leaders of programs and services to build in accessibility best practices from the start by incorporating feedback from disability community representatives and subject matter experts, as well as feedback from customers with disabilities collected through complaints and surveys. The AO has conducted a holistic assessment of policies and continues to make recommendations to modify and develop 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.
  - Progress/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 trainings regarding 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. Additional customized training for departments is provided to management by the AO, as well as more in-depth training and presentations to Customer Relations and customer-facing staff.

### **Transportation**

- Initiative: Opportunity to add accessible features to existing rolling stock.
  - Progress/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 first completed car was presented to disability representatives on June 13, 2023. The rollout will continue through the first quarter of Fiscal Year 2025 (October 2024 – January 2025).



- Progress/Future State: Amtrak has identified—and is in the process of executing—12 accessibility improvement efforts for existing 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.
- Progress/Future State: Amtrak applies best practices and feedback from the disability community and passengers with disabilities to the planning of new fleets. Feedback and best practices are applied, where possible, to the designs of new fleets with regular presentations to the disability community. Amtrak has also contracted with a braille proofreader to test and make recommendations for the New Acela fleets.

# **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) is published on the <u>Accessible Travel Services</u> and <u>Freedom of Information Act (FOIA)</u> 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.

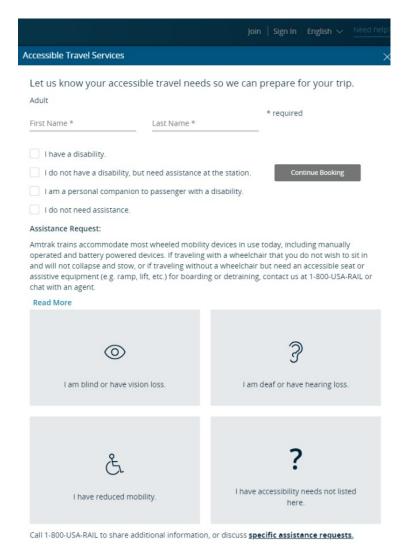
Section 35 – Services to provide on request:

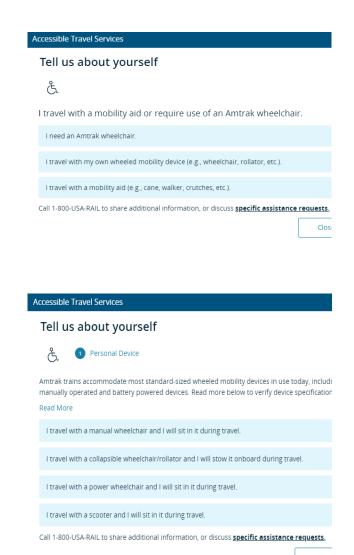
Amtrak provides services and accommodations listed on the <u>Accessible Travel Services</u> page and makes every effort to accommodate reasonable requests from passengers with disabilities as needed and when possible if outside of policy. Amtrak surveys and collects feedback from passengers with disabilities and disability organization representatives, in addition to employees with disabilities, and customer-facing employees who work directly with passengers with disabilities. The Amtrak AO 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.

<u>Service animals</u> 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. Pursuant to U.S. Department of Justice regulations under Title 28 CFR Part 35.014, recent updates to regulations under the Air Carrier Access Act (ACAA), Title 14 CFR Part 382, and in consultation with the DOT Office of Civil Rights, in June 2024, Amtrak will modify it its service animal policy to reflect that acceptable service animal species are limited to dogs trained to perform specific work or task that are directly related to the individual's disability.

### 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. Amtrak AO representatives participate in events and tours hosted by disability organizations.

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 senior leaders 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 inclusive rail travel and experiences now and in the future toward increasing disabled ridership.