

Thank you to Transport Canada for providing the materials and for helping with the development of this case!

Evaluation of Intercity Bus Code of Practice for the Voluntary Provision of Accessible Services

You are the evaluation project manager for an evaluation of the Intercity Bus Code of Practice For the Voluntary Provision of Accessible Services, which you are carrying out under contract for Transport Canada. You and your team have submitted a final draft report of your data and recommendations to us at Transport Canada, and we would like you to answer the following questions before finalizing your report. Feel free to point out weaknesses in the material you have submitted – we are willing to extend the contract for you to make whatever necessary adjustments to the draft you have presented. We would like to hear your thoughts on these questions in a half-hour long presentation this afternoon. You may use software such as PowerPoint to provide a visual complement to your presentation.

Methodology

- A. You note in your survey distribution results that the number of returns average is 37% (page 5).
 - a. Does this return rate affect your ability to generalize results?
 - b. Are there sufficient survey responses upon which to make conclusions about the actual and potential users of accessible intercity bus services?
 - c. What strategies would you recommend to overcome the distribution challenges you faced, for the benefit of future evaluation studies?
 - d. Do the results sufficiently represent people with disabilities who live in remote communities? Do you perceive any differences between rural and urban needs and experiences?
- B. What measures did you take to create different survey formats for users with different types of disabilities?
- C. Besides surveys, what other data collection methods would have been appropriate for an evaluation of this nature?

Data Analysis

- D. The attached report (which you drafted) contains some of the statistical analysis done on the data, but very little interpretation. Could you provide us with a summary interpretation of these findings? Please describe which chi-squares are significant, and what this means to people who do not have a background in statistics.
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E. Findings and Recommendations

A copy of your draft evaluation report was distributed a few days ago to the groups involved in the study to inform them of your findings and recommendations. You have just received two letters from some of these stakeholder groups, demanding that major changes be made to your report before it is handed in to Transport Canada, the sponsor of the evaluation and your client.

Although no one is disputing your recommendations of developing a standardized training package and promoting awareness of the Code, there is some dissent over the other two recommendations.

The various associations for people with disabilities want the Voluntary Code to be changed to regulations. If the Code is protected in federal regulations, the industry would be responsible for its implementation and the costs that are associated with it. They feel that making the Voluntary Code Governance Principles into legislation would promote equity of transportation access in all modes to all Canadians. The associations of people with disabilities would like you to change your recommendation in light of this fact.

The Intercity Bus Industry does not agree with your recommendation of creating benchmarks and evaluation schedules through a consensus process. The industry very much wants to retain a voluntary code. It sees this recommendation as going far beyond what it agreed to when it entered into an agreement to enter into a voluntary code and it believes that it is not necessary given industry's progress to date. The Intercity Bus Industry representatives have sent a joint letter requesting that your recommendation should be removed completely from your evaluation report.

F. As the evaluation team that developed this report, it is up to you to determine what your final draft report will recommend. Please describe what your final decision will be (i.e., change your recommendations or leave your report as it is) and explain why you have made this choice. Briefly discuss the theories and writings that have influenced your decision in your justification.

1 INTRODUCTION

The Intercity Bus Code of Practice for Voluntary Provision of Accessible Transport Services sets out guidelines for the provision of safe and dignified intercity bus travel for persons with disabilities. The Code outlines which services are to be provided automatically, which services require advance notice, and which services are to be provided upon request. The Code covers scheduled intercity bus services, terminals and bus stops.

The current study was designed to evaluate the implementation of the Intercity Bus Code of Practice and to evaluate the complaint resolution process. In this report, emphasis is placed on the awareness level of the Code amongst bus companies, terminal operators, associations representing persons with disabilities, relevant provincial government agencies, and amongst actual and potential users of accessible intercity bus services. In particular, the following issues are addressed:

- The level of awareness of the Code and Complaint Guide
- The level of conformity of intercity bus companies to the Code
- A description of users' experience with accessible services and infrastructure on intercity buses, and their understanding and use of the complaint process

2 SURVEY DESIGN AND IMPLEMENTATION

This section outlines the general design of the survey questionnaires and the methodology surrounding their implementation.

2.1 Main Objectives Of The Study

The ultimate objective of the study is to assess the implementation of the Code and to identify what improvements, if any, are needed. This analysis provides a general assessment of the awareness and compliance of intercity buses to the Code and presents information regarding the accessibility of intercity buses as viewed by users and potential users of the services addressed in the Code. In particular, the main objectives of this report are:

- To ascertain to what extent persons with disabilities are aware and knowledgeable of the Code and the complaint process;
- To provide a description of users' experience with accessible services and infrastructure on intercity buses, and to determine their understanding and use of the complaint process;
- To establish the awareness of bus companies to the Code and Complaint Guide and examine their compliance to the Code;
- To ascertain the awareness of relevant associations to the Code and determine if / how information about the Code is being communicated to their members.

2.2 Questionnaire Design

Five survey instruments were developed and subsequently distributed as a means to evaluate the implementation of the Intercity Bus Code of Practice for voluntary provision of accessible transport services and to evaluate the complaint resolution process. Survey instruments were developed for the following five target groups:

1. Actual and potential users of accessible intercity bus services
2. Bus operators
3. Bus terminal operators
4. Associations of people with disabilities
5. Relevant provincial government agencies

For each target group, a preliminary questionnaire was developed and subsequently tested on a small sample.

The survey for actual and potential users of accessible intercity bus services (henceforth deemed the user/non-user survey) was pre-tested on 10 Anglophone and four Francophone persons with disabilities in the Ottawa-Hull area. The Anglophone respondents comprised of two individuals from each of the five following Ottawa-based associations:

- Canadian Paraplegic Association (persons using wheelchair/scooter);
- Canadian National Institute for the Blind (persons who are blind using a guide dog/cane);
- Canadian Hard of Hearing Association (persons who are hard of hearing);
- Canadian Association for the Deaf (persons who are deaf); and
- Canadian Independent Living Centre (persons with cognitive impairments).

The 4 Francophone respondents comprised of 1 individual who required a wheelchair, 2 individuals with serious vision problems, and 1 individual who was hard of hearing. The pre-test comments resulted in a number of minor revisions. The final survey instrument for users and potential users of accessible intercity bus services is provided in Appendix A along with the accompanying cover letters.

The Director of Safety for Greyhound Canada and the Director of Operations for Autobus Maheu were interviewed and asked to review the bus operator questionnaire. A terminal director for Greyhound Canada, and the general manager for Central Station Montreal, reviewed the terminal operator survey. These pre-test interviews resulted in several minor revisions for both survey instruments. The final survey instruments for bus and terminal operators are included in Appendix B.

The government agency survey instrument was pre-tested on a representative from the Government of Alberta Department of Transportation. This resulted in no changes to this questionnaire. The final survey instrument for government agencies is given in Appendix C.

The preliminary questionnaire designed for associations of people with disabilities was presented to three associations: the Canadian Hard of Hearing association in Calgary, the Canadian National Institute for the Blind in Ottawa, and the Canadian Association of the Deaf in Ottawa. Although the pre-test resulted in no changes to the content or the language of the questionnaire, suggestions regarding the introductory note and survey instructions were implemented. The final survey instrument is found in Appendix D.

2.3 Survey Distribution and Data Collection

As no list, complete or otherwise, of persons with disabilities is available for general use, the user/non-user survey was administered in cooperation with association of persons with disabilities, bus companies and bus associations. These organizations have membership or user lists available to them. Due to confidentiality, such organizations are generally unable to share such lists with others parties, however, several organizations were willing to send out the questionnaires on behalf of Transport Canada (TC). Bundles of questionnaires were sent out to several organizations across Canada. These organizations then attached mailing labels to pre-stamped envelopes, which contained the user/non-user questionnaire, an accompanying cover

letter and a pre-stamped return envelope. The questionnaire packages were then mailed out to a random sample of their members. Note that the preliminary analysis presented in the August report indicated a lack of representation from persons with disabilities who reside in the Eastern provinces. As such, an additional 200 surveys were distributed through three provincial associations for persons with disabilities located in Nova Scotia, PEI and Newfoundland.

In addition to direct mailings, the survey designed for actual and potential users of accessible intercity bus was posted on the company web site. Several organizations for persons with disabilities advertised the online web survey in their newsletters. Several associations for persons with disabilities had also established a link to the user/non-user survey on their web page. This allowed many of their members to become aware of the survey and to conveniently participate in the survey. The number of electronic submissions comprises almost one-third of the user/non-user sample. The remaining responses were obtained by mail-out surveys, which were distributed through various associations for the disabled and through the Quebec Bus Owner Association, as discussed above.

Surveys for bus operators, terminal operators, associations, and government agencies were distributed and collected through mail, email and/or fax. These surveys have been supplemented with follow-up phone interviews.

Survey distribution and response rates through to November 15, 2001 are summarized in Table 1 below.

Table 1: Survey Distribution Results

Target Group	Number of Surveys Distributed	Number of Returns
Actual and potential users of accessible intercity bus services	Mailed through Disability Associations: 522 Quebec Bus Owner Association (APAQ): 100 Greyhound List: 53 Internet Survey: (94) Total: 769	125 (24 percent) 51 (51 percent) 16 (30 percent) 94 286 (37 percent)
*Bus Companies	Mailings: 103	15 (Representing 902 Intercity Buses) 5 (indicating the survey did not apply to them)
*Bus Terminal Operators	Mailings: 35	6 (represents 993 terminals when combined)

		with bus company surveys) 1 (indicating the survey did not apply to them)
Provincial Government Departments	Mail/Email: 10	10
Associations for People with Disabilities	Fax/Email: 19	13
Associations of Bus Companies	Mailings: 5	4

* A number of surveys were forwarded to Greyhound for completion. They have consolidated their response on one survey of terminal operators and one survey of bus operators

2.4 Data Management & Consistency Checks

Data for actual and potential users were stored electronically when respondents submitted an on-line survey. Mailed-in responses have been gathered and subsequently entered into the online database. A Code was used to distinguish mailed-in surveys from those entered on-line. The online database has been converted to an excel spreadsheet and a SAS data file. Consistency checks were carried out on the data. Nineteen respondents replied that they had not used an intercity bus in question 9 but indicated using an intercity bus in question 11. Fifteen of these respondents completed the remaining questions of the survey that were designed for users of intercity bus services, and many of these respondents also indicated current use of intercity bus services in their comments. Subsequently, the answer to question 9 for these fifteen respondents was converted to “yes” and they were designated as intercity bus “users”, as were all those who entered “yes” to question 9 of the user/non-user survey questionnaire. The four individuals who indicated that they have not used an intercity bus in the past 2 years in question 9 but indicated using an intercity bus in question 11 without completing the remaining survey questions were designated as “non-users”.

Data collected for bus operators, terminal operators, associations, and government agencies have been entered into an excel spreadsheet. The preliminary analysis revealed a surprising lack of Code awareness for several government agencies such as the BC Motor Carrier Commission. These responses have been verified and no changes have been made.

APPENDIX E. USER / NON-USER TABULATIONS

E.1 User / Non-User Tabulations

Q5. Type of Disability

Disability	Frequency	Percent
a. manual wheelchair	83	29.6
b. powered wheelchair	74	26.4
c. physical support device	38	13.6
d. blind	31	11.1
e. severe sight problems	30	10.7
f. deaf	19	6.8
g. hard of hearing	43	15.4
h. sensory/cognitive	12	4.3
i. other	26	9.3

Number missing=6

Note that some respondents have more than one type of disability. More specifically, 79.6 percent of the respondents indicated only one of the above disabilities, whereas 20.4 percent of the respondents indicated more than one type of ailment, as shown in the table below:

Number of Ailments	Frequency	Percent	Cumulative Frequency	Cumulative Percent
1	223	79.6	223	79.6
2	45	16.1	268	95.7
3	10	3.6	278	99.3
4	1	0.4	279	99.6
9	1	0.4	280	100.0

Frequency Missing = 6

Disability Class	Frequency	Percent
Wheelchair (manual or powered)	133	47.5 percent
Mobility (wheelchair or physical support device)	162	57.9 percent
Sight (blind or severe sight problems)	59	21.1 percent
Hearing	59	21.1 percent
Sensory/Cognitive disability	12	4.3 percent

Q6. Are you aware of the Intercity Bus Code of Practice?

Q6	Frequency	Percent	Cumulative Frequency	Cumulative Percent
no	233	81.5	233	81.5
yes	53	18.5	286	100.0

Q7. Are you familiar with the content of the Code?

Q7	Frequency	Percent	Cumulative Frequency	Cumulative Percent
no	255	89.2	255	89.2
yes	31	10.8	286	100.0

Are you familiar with the content of the Code? (Only Those Who Responded "YES" to Q6 included)

Q7	Frequency	Percent	Cumulative Frequency	Cumulative Percent
no	23	43.4	23	43.4
yes	30	56.6	53	100.0

Q8. How did you become aware of the Code?

Q8	Frequency	Percent	Cumulative Frequency	Cumulative Percent
a. Bus Operator	12	22.6	12	22.6
b. Transport Canada	16	30.2	28	52.8
c. Disability Association	18	34.0	46	86.8
d. Friends/Relatives	1	1.9	47	88.7
e. Other	6	11.3	53	100.0

Q9. Have you used an Intercity Bus in the last two years?

Q9	Frequency	Percent	Cumulative Frequency	Cumulative Percent
no	137	47.9	137	47.9
yes	149	52.1	286	100.0

For the remaining tabulations, those who answered "YES" to Q9 or indicated that they traveled by intercity bus in Q11 were considered users¹, all others were considered non-users.

NON-USERS: Question 10

Q10. If you have not used an intercity bus, why? (May check more than one)

Q10. Reason For Not Using Intercity Bus Services	Number of Respondents	Percent
a. I had no need	37	27.0
b. I use other means of transportation	55	40.1
c. There is no bus service in my area	29	21.2
d. Bus tickets are too expensive	8	5.8
e. Intercity buses are not accessible	27	19.7

E.2 Two-Way Tables

TABLE OF Q9 BY Q6

Q9(Have you used an Intercity Bus in the last 2 years)
Q6(Are you aware of the Intercity Bus Code)

Frequency Percent Row Pct Col Pct	no	yes	Total
no	112	25	137
	39.16	8.74	47.90
	81.75	18.25	
	48.07	47.17	
yes	121	28	149
	42.31	9.79	52.10
	81.21	18.79	
	51.93	52.83	
Total	233	53	286
	81.47	18.53	100.00

STATISTICS FOR TABLE OF Q9 BY Q6

Statistic	DF	Value	Prob
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¹ Note that four respondents indicated a "NO" for Q9 and responded why they did not travel by intercity bus travel in Q10 but indicated travel in Q11 without completing the remainder of the survey. These four individuals were considered non-users

Chi-Square	1	0.014	0.906
Likelihood Ratio Chi-Square	1	0.014	0.906
Continuity Adj. Chi-Square	1	0.000	1.000
Mantel-Haenszel Chi-Square	1	0.014	0.906
Fisher's Exact Test (Left)			0.606
(Right)			0.514
(2-Tail)			1.000

Sample Size = 286

TABLE OF Q9 BY Q7

Q9(Have you used an Intercity Bus in the last 2 years)
 Q7(Are you familiar with the content of the Code)

Frequency			
Percent			
Row Pct			
Col Pct	no	yes	Total
no	125	12	137
	43.71	4.20	47.90
	91.24	8.76	
	49.02	38.71	
yes	130	19	149
	45.45	6.64	52.10
	87.25	12.75	
	50.98	61.29	
Total	255	31	286
	89.16	10.84	100.00

STATISTICS FOR TABLE OF Q9 BY Q7

Statistic	DF	Value	Prob
Chi-Square	1	1.177	0.278
Likelihood Ratio Chi-Square	1	1.189	0.276
Continuity Adj. Chi-Square	1	0.800	0.371
Mantel-Haenszel Chi-Square	1	1.173	0.279
Fisher's Exact Test (Left)			0.899
(Right)			0.186
(2-Tail)			0.342

Sample Size = 286

Awareness of the Code by Disability Class

STATISTICS FOR TABLE OF WHEELCHAIR USE BY Q6(Are you aware of the Intercity Bus Code)

Statistic	DF	Value	Prob
Chi-Square	1	0.652	0.419
Likelihood Ratio Chi-Square	1	0.655	0.418
Continuity Adj. Chi-Square	1	0.429	0.512
Mantel-Haenszel Chi-Square	1	0.650	0.420
Fisher's Exact Test (Left)			0.257
(Right)			0.831
(2-Tail)			0.449

STATISTICS FOR TABLE OF MOBILE BY Q6

Statistic	DF	Value	Prob
Chi-Square	1	1.525	0.217
Likelihood Ratio Chi-Square	1	1.514	0.219
Continuity Adj. Chi-Square	1	1.169	0.280
Mantel-Haenszel Chi-Square	1	1.519	0.218
Fisher's Exact Test (Left)			0.140
(Right)			0.917
(2-Tail)			0.224

STATISTICS FOR TABLE OF FSIGHT BY FQ6

Statistic	DF	Value	Prob
Chi-Square	1	1.330	0.249
Likelihood Ratio Chi-Square	1	1.269	0.260
Continuity Adj. Chi-Square	1	0.932	0.334
Mantel-Haenszel Chi-Square	1	1.325	0.250
Fisher's Exact Test (Left)			0.908
(Right)			0.167
(2-Tail)			0.262

STATISTICS FOR TABLE OF HEARING BY FQ6

Statistic	DF	Value	Prob
Chi-Square	1	1.330	0.249
Likelihood Ratio Chi-Square	1	1.269	0.260
Continuity Adj. Chi-Square	1	0.932	0.334
Mantel-Haenszel Chi-Square	1	1.325	0.250
Fisher's Exact Test (Left)			0.908
(Right)			0.167
(2-Tail)			0.262
Sample Size = 286			

TABLE OF Q3 BY Q6

Q3 (In which Province or Territory do you live)
 Q6 (Are you aware of the Intercity Bus Code)

Frequency Row Pct	no	yes	Total
Alberta	17 70.83	7 29.17	24
BC	35 89.74	4 10.26	39
Manitoba	8 66.67	4 33.33	12
New Brunswick	7 87.50	1 12.50	8
Newfoundland	25 83.33	5 16.67	30
Northwest Territ	1 100.00	0 0.00	1
Nova Scotia	12 70.59	5 29.41	17
Nunavut	0 0.00	1 100.00	1
Ontario	60 76.92	18 23.08	78
PEI	8 100.00	0 0.00	8
Quebec	52 86.67	8 13.33	60
Saskatchewan	7 100.00	0 0.00	7
Yukon	1 100.00	0 0.00	1
Total	233 81.47	53 18.53	286 100.00

TABLE OF LOCATION BY Q6

LOCATION
Q6(Are you aware of the Intercity Bus Code)

Frequency Percent Row Pct Col Pct	no	yes	Total
Quebec	52 18.37 86.67 22.51	8 2.83 13.33 15.38	60 21.20
Central (Manitoba, Ontario)	68 24.03 75.56 29.44	22 7.77 24.44 42.31	90 31.80
East (NB, NS, PEI, Nfld)	52 18.37 82.54 22.51	11 3.89 17.46 21.15	63 22.26
West (BC, Alberta Sask.)	59 20.85 84.29 25.54	11 3.89 15.71 21.15	70 24.73
Total	231 81.63	52 18.37	283 100.00

STATISTICS FOR TABLE OF LOCATION BY Q6

Statistic	DF	Value	Prob
Chi-Square	3	3.593	0.309
Likelihood Ratio Chi-Square	3	3.531	0.317
Mantel-Haenszel Chi-Square	1	0.033	0.857
Phi Coefficient		0.113	
Contingency Coefficient		0.112	
Cramer's V		0.113	

Sample Size = 283

TABLE OF LOCATION BY NO-ACCESS (Non-Users who do not use the bus because they believe intercity buses are not accessible to them)

LOCATION	NO ACCESS		
	Frequency	Percent	Row Pct
	Col Pct	No	Yes
			Total
Central	33	12	45
	24.26	8.82	33.09
	73.33	26.67	
	30.28	44.44	
East	33	7	40
	24.26	5.15	29.41
	82.50	17.50	
	30.28	25.93	
Quebec	18	1	19
	13.24	0.74	13.97
	94.74	5.26	
	16.51	3.70	
West	25	7	32
	18.38	5.15	23.53
	78.13	21.88	
	22.94	25.93	
Total	109	27	136
	80.15	19.85	100.00

STATISTICS FOR TABLE OF LOCATION BY NO ACCESS

Statistic	DF	Value	Prob
Chi-Square	3	4.076	0.253
Likelihood Ratio Chi-Square	3	4.807	0.187
Mantel-Haenszel Chi-Square	1	0.710	0.399
Phi Coefficient		0.173	
Contingency Coefficient		0.171	
Cramer's V		0.173	

Sample Size = 136

TABLE OF LOCATION BY Q12

LOCATION		Q12 (Accessibility of intercity buses)					
Frequency	Percent	Row Pct	Col Pct	a. none	b. some	c. all	Total
Central	11			25	9		45
(Ontario,	7.48			17.01	6.12		30.61
Manitoba)	24.44			55.56	20.00		
	39.29			31.25	23.08		
East	8			11	4		23
(NS, NB,	5.44			7.48	2.72		15.65
PEI, Nfld)	34.78			47.83	17.39		
	28.57			13.75	10.26		
Quebec	4			19	18		41
	2.72			12.93	12.24		27.89
	9.76			46.34	43.90		
	14.29			23.75	46.15		
West	5			25	8		38
(BC, Alberta	3.40			17.01	5.44		25.85
Sask.)	13.16			65.79	21.05		
	17.86			31.25	20.51		
Total	28			80	39		147
	19.05			54.42	26.53		100.00

STATISTICS FOR TABLE OF LOCATION BY Q12

Statistic	DF	Value	Prob
Chi-Square	6	14.358	0.026
Likelihood Ratio Chi-Square	6	13.604	0.034
Mantel-Haenszel Chi-Square	1	3.003	0.083
Phi Coefficient		0.313	
Contingency Coefficient		0.298	
Cramer's V		0.221	

Sample Size = 147

SUMMARY STATISTICS FOR LOCATION BY BUS ACCESSIBILITY CONTROLLING FOR HEARING

Cochran-Mantel-Haenszel Statistics (Based on Table Scores)

Statistic	Alternative Hypothesis	DF	Value	Prob
1	Nonzero Correlation	1	6.650	0.010
2	Row Mean Scores Differ	3	9.296	0.026
3	General Association	3	9.296	0.026

Total Sample Size = 147

TABLE OF LOCATION BY Q14 (Accessibility of bus terminals and stops)

LOCATION	Q14			Total
	a. not at all	b. sometimes	c. always	
Frequency				
Percent				
Row Pct				
Col Pct				
Central	15	21	8	44
	10.27	14.38	5.48	30.14
	34.09	47.73	18.18	
	36.59	30.43	22.22	
East	4	14	5	23
	2.74	9.59	3.42	15.75
	17.39	60.87	21.74	
	9.76	20.29	13.89	
Quebec	13	15	13	41
	8.90	10.27	8.90	28.08
	31.71	36.59	31.71	
	31.71	21.74	36.11	
West	9	19	10	38
	6.16	13.01	6.85	26.03
	23.68	50.00	26.32	
	21.95	27.54	27.78	
Total	41	69	36	146
	28.08	47.26	24.66	100.00

STATISTICS FOR TABLE OF LOCATION BY FQ14

Statistic	DF	Value	Prob
Chi-Square	6	5.604	0.469
Likelihood Ratio Chi-Square	6	5.739	0.453
Mantel-Haenszel Chi-Square	1	1.245	0.265
Phi Coefficient		0.196	
Contingency Coefficient		0.192	
Cramer's V		0.139	

Sample Size = 146

CONCLUSIONS AND RECOMMENDATIONS

Although the analysis reported here indicates the extent of intercity bus accessibility in the time period since adoption of the Voluntary Code, the absence of a measured baseline, or “before the Code” picture, means that we cannot gauge whether or not such indications denote an enhanced degree of accessibility. With that caveat, two groups of conclusions emerge, those pertaining to accessibility and those pertaining to awareness and knowledge of the Voluntary Code among people with disabilities, bus companies, trade associations and associations of people with disabilities. The three text boxes below summarize each group of findings in turn.

4.1 Accessibility

As shown in Text Box 4.1, more than 80 percent of people with disabilities who used an intercity bus at least once during the two years prior to the survey indicated that the vehicle was accessible. While more than half of the users surveyed indicated difficulty, less than a fifth of users in the sample indicated that difficulties rendered the service effectively inaccessible. A larger number of users, though still a minority at 28 percent, indicated that terminals and stops are inaccessible.

Among those expressing difficulty with the service, people with a hearing-related disability are more prominent than people who use a wheelchair. A small minority – an estimated 12 percent - of passengers who use a wheelchair indicated that they encountered serious accessibility problems.

Among people with disabilities who did not use intercity bus service during the two years prior to the survey, a minority – just under a fifth – indicated accessibility problems as a reason for not doing so. This figure is increased to just over a third for persons requiring the use of a wheelchair.

4.2 Awareness Of The Code

Virtually all bus companies with a fleet size of at least 10 intercity buses indicate awareness of the Voluntary Code and a majority report the provision of some level of training for bus operators and field staff. The degree of training is not standardized across the industry, however.

Whereas a majority of people with disabilities (users and non-users of intercity buses alike) report that the service is either accessible or that inaccessibility is not a barrier to use, very few are aware of the Voluntary Code (about a fifth, as shown in Text Box 2). In addition, only half the Provincial government agencies that we surveyed were aware of the Code. The low rate of awareness among consumers does not itself indicate that the Code is ineffective, however. The population at-large benefits from safe and effective transportation services, food, drugs and consumer products without ever being aware of the regulatory and voluntary health, safety and

other standards that govern their provision. On the other hand, the population's general recognition that regulatory and self-regulatory mechanisms exist for their protection is known to be an important foundation for consumer confidence and consumption. As well, Canada-wide Provincial government awareness of Code could certainly be expected to help increase the visibility and importance of intercity bus access in provincial transport policies. In short, a greater level of consumer and Provincial awareness of the Voluntary Code would most likely precipitate improved mobility in relation to intercity bus services.

Text Box 4.1

Accessibility of Intercity Buses, Bus Terminals and Stops

Buses

More than 80 percent of users surveyed indicated that intercity buses are accessible, though with differing levels of difficulty in use. An estimated 19 percent of users surveyed indicated that buses are not at all accessible. Those with a hearing related disability were more likely to report that intercity buses were not accessible for their disability.

Almost 90 percent of intercity bus users who use a wheelchair indicated that buses are accessible, with differing levels of difficulty. An estimated 11.5 percent of intercity bus users requiring the use of a wheelchair indicated that intercity buses were not accessible in relation to their disability.

An estimated 34.7 percent of non-users of intercity buses who use a wheelchair reported lack of accessibility of intercity buses as a main reason for not using such services.

Users in Central and Eastern Canada were more likely to report that intercity buses are not at all accessible than were users in Quebec and Western Canada.

The number of lift-equipped buses currently comprises approximately 16.1 percent of the intercity bus fleet.

Terminals and Stops

More than 70 percent of users surveyed indicated that intercity bus terminals and stops are accessible, though with differing levels of difficulty. An estimated 28 percent of the users surveyed indicated that bus terminals and stops are not at all accessible for their disability. Most bus operators and terminal operators indicated that bus terminals and bus stops are at least somewhat accessible (usable with differing levels of difficulty).

Overall Degree of Accessibility

Approximately 65 percent of the users surveyed experienced at least one problem during their intercity bus travels due to their disability.

Approximately 35 percent of users with a mobility related disability indicated inadequate boarding and, or disembarking assistance or were refused such assistance at least once over the past 2 years.

A majority of users indicated that they received appropriate treatment from bus operating personnel. Approximately 25.5 percent of all users felt the bus driver was insensitive to their needs at least once

while traveling by intercity bus over the past two years.

Text Box 4.2

Knowledge of the Code and Accompanying Complaint Guide Among Users and Non-Users

Almost one-fifth of actual and potential users of accessible intercity bus services are aware of the Code (18.5 ± 4.5 percent), whereas an estimated 10.8 percent of the respondents were familiar with the content of the Code (10.8 ± 3.6 percent).

Just over 10 percent of users of accessible intercity bus services are aware of the Complaint Guide (12.1 ± 5.2 percent).

A small minority of users surveyed (6.7 ± 4.0 percent) were familiar with the contents of the Complaint Guide.

An estimated 11.4 percent of users surveyed indicated that they have made a written complaint to a bus company and/or Transport Canada. Over half of these complainants indicated that they were not satisfied with the outcome.

Text Box 4.3

Knowledge of the Code and Complaint Guide Among Bus Companies, Government Agencies and Associations for Persons with Disabilities

All major bus companies surveyed (those with more than ten vehicles) are aware of the existence of the Intercity Bus Code,

The majority of bus companies indicated that they offer some form of training for employees in relation to the Code

Approximately half of all bus companies surveyed report that they have developed a written plan regarding their approach to the Code.

A majority of the smaller companies are not aware of the Code.

There have been few formal complaints.

Government agencies are split in terms of their awareness of the Code and Complaint Guide. Agencies that are aware of the Code have passed on the information to other departments by either providing them with a copy of the Code or sending out a newsletter.

Thirteen associations that represent persons with disabilities completed a survey. The four national associations were aware of the Code and Complaint Guide as were three of the five provincial chapters. All four local chapters were unaware of the Code. Those association aware of the Code have passed on information to their members

All but one intercity bus trade associations indicated that they were aware of the Code and accompanying Complaint Guide.

4.3 Recommendations

Recommendations are given in three categories, as follows:

- Governance principles for the Voluntary Code;
 - Development of evaluation benchmarks and schedule;
 - Development of a standardized training package; and
 - Promotion of the Code among people with disabilities and Provincial agencies.
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4.3.1 Governance Principles for the Voluntary Code

In its current form, the Voluntary Code is not specifically identified with an organization or entity. In light of the Code's voluntary status, we recommend that title to Code (i.e., its "ownership") be adopted by the Intercity Bus Industry, through its leading trade association. Title should be listed clearly on the Code and in all major awareness media. Endorsement of the Code should be listed prominently, including governments and associations of people with disabilities.

As owner of the Voluntary Code, the Intercity Bus Industry should be responsible for executing the consensus process for formulating benchmarks (see below), and for future evaluations. In light of the public-private nature of the Voluntary Code, the federal government should finance a part of the cost of the consensus and evaluation process (through the provision of facilities, equipment, mailing lists and facilitators). Whereas we recommend that the Transportation Development Centre finance 100 percent the development of the training package (see below), industry should fully finance the execution of training in the field.

4.3.2 Creation of Benchmarks and Evaluation Schedule

Five specific recommendations are given here.

1. Adoption of a Baseline Level of Accessibility

As indicated above, the absence of a measured baseline, or "before" picture, means that we cannot gauge whether or not such indications connote enhanced accessibility. Accordingly, we recommend the adoption of this report as the performance Baseline against which future assessments are to be compared.

2. Adoption of Benchmarks for Accessibility, Code-Awareness and Training Benchmarks

Targets, or benchmarks, to guide on-going measurement of the Code's performance have not been established. We recommend the development of such benchmarks. We recommend that benchmarks be quantitative and time-specific. Quantitative means that benchmarks should be stated in terms that facilitate measurement against the Baseline.²

² Additional benchmarks can be included as appropriate. Where a benchmark does not correspond to a Baseline measurement, however, a supplementary Baseline study should be undertaken.

“Time-specific” means that the month and year for achieving the benchmark should be stated. Interim benchmarks should be established where the target year is more than two years from the date the benchmark is adopted.

Benchmarks should include specific targets pertaining to awareness of the Voluntary Code. Targets should be established for the desired degree of awareness in each of the sectors reported in this study. These include people with disabilities; bus companies; trade associations; associations of people with disabilities; provincial governments; and government agencies. Benchmarks should also be established in relation to awareness media. Whether advertising by bus companies should be included among the awareness media should be addressed in the process of developing awareness benchmarks.

Benchmarks should include specific targets for the development of a bus operator and terminal management training package and for the training of operators and terminal managers.

3. Adoption of a Benchmark Evaluation Schedule

The measurement instruments established and applied in this study should be re-applied according to an established and published evaluation schedule. The schedule should correspond to the time-specific benchmarks (interim and final) and should include periodic, though less frequent, re-assessments thereafter.

4. Consensus Business Process for Establishing Benchmarks

We recommend a consensus process as the basis for establishing the benchmarks and benchmark evaluation schedule. Stakeholders should include representatives of bus companies; representatives of trade associations of intercity bus companies; people with disabilities; representatives of associations of people with disabilities representatives; CTA; Transport Canada; and disinterested experts.

The consensus process should be grounded in rigorous criteria, including baseline conditions; broadly based policy standards; technological feasibility; and financial affordability. The consensus process should be initiated with professionally developed draft benchmarks reflective of such criteria. Facilitation over the period of one to two days would seek final agreement.

In cases where consensus cannot be achieved, final benchmarks should be established within the principles that guide the development of *voluntary* Codes of conduct. This means that final benchmarks should not be imposed by non-industry parties; if they were so imposed, they would not be voluntary.

5. Publication

We recommend publication of the Baseline, the benchmarks and the benchmark evaluation schedule in a revised edition of the Voluntary Code of Practice.

4.3.3 Standardized Training

In light of the non-standard training regimes in the industry, we recommend that the federal government, through the Transportation Development Centre develop a training package for use by intercity bus companies in training senior management; bus operators; and terminal managers. The package should include a train-the-trainer component, video demonstrations for distinct categories of disability and technology choices for senior managers involved in investment planning. While development of the package would be federally financed, its application in the field would be financed by the intercity bus industry.

4.3.4 Promoting Awareness of the Code

Recommendations here pertain to both the intercity bus industry and to the federal government.

The Intercity Bus Industry

While nothing in the Voluntary Code of Practice compels the industry to advertise the Code as a means of attracting passenger traffic, this report does recommend that the industry take steps to promote a basic level of awareness of its existence. Making copies of the Code, or summary sheets, available at major terminals and ticket outlets, and posting signs indicating its availability, would help. Many users of the intercity network no doubt have friends and relatives with disabilities and word of Code and its intent could be expected to spread.

The Federal Government

We recommend that the Transport Canada or the Canadian Transportation Agency take steps to ensure comprehensive awareness of the Code's existence, aims and content among all not-for-profit organizations representing the specific interests of people with disabilities. Such steps should centre on a mail-out package that includes a cover letter, the Code and a short-form summary of the Code. The cover letter should encourage organizations to make their members aware of the Code. In this respect, the cover letter should identify various media through which organizations can implement an awareness campaign, including bulk mailings and e-mailings.

Not-for-profit organizations are likely constrained financially in their ability to execute such campaigns, Transport Canada or the Canadian Transportation Agency could participate by financing the development of an outreach package and making it available in bulk to organizations (on a demand-request basis) for re-distribution to their membership. Re-distribution would be the organizations' expense. The package would be available in both official languages and all appropriate media.

To achieve comprehensive awareness of the Code among Provincial governments, we recommend the distribution of the outreach package identified above to all relevant Provincial agencies. Distribution would be through appropriate federal-provincial channels of communication.
