

Attention: [AODA.compliance@ontario.ca](mailto:AODA.compliance@ontario.ca)

To whom it may concern,

This letter is in response to your request for information related to the City of Ottawa's previous compliance reports under the *Accessibility for Ontarians with Disabilities Act, 2005*. More specifically, your request to provide a status update on the City's compliance to meet the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A, under Section 14 of the *Integrated Accessibility Standards Regulation*, as the City reported non-compliance with this clause in the 2015 and 2017 compliance reports.

As previously shared in 2017 with the Accessibility Directorate of Ontario, the City of Ottawa has faced numerous challenges in meeting full compliance with the WCAG requirements. The City is committed to full implementation of the WCAG requirements, and significant on-going effort, time and resources have been invested in meeting this standard. We have continued to make progress on our current 24 websites, 57 applications and three (3) mobile apps, which has resulted in much greater accessibility for all users, including persons with disabilities. However, even one error in any of these websites or apps would require the City to answer "no" on the compliance report.

As noted in the City's October 17, 2019 submission to the Information and Communication Standards Development Committee, the City continues to recommend that instead of focusing on strict adherence to this standard, that the Province mandate incremental and continuous website and web content improvements to increase accessibility, the development of an accessible web plan, policy and procedures, a procurement process, and training program. The City has implemented all of these aspects.

### **City of Ottawa Compliance Plan Update**

The objective of the City's plan ensures that our websites and web content meet the legislated requirements by 2021. However, this is not the only goal. Through staff education, we are ensuring that the overall goal is to enhance user experience to the site. By providing a fully accessible website, it ensures that all users will be able to share that experience.

In 2018, the City implemented a Web Accessibility Policy, which clearly indicates the corporation's obligation toward compliance and clearly states the roles and responsibilities of key stakeholders. For reference, this policy is attached.

Dedicated staff are essential for working towards full WCAG 2.0 AA compliance. Most City departments now have a Web Lead (Coordinator, Digital Services) and Officer, Digital Services to ensure applicable accessibility standards are implemented. Additionally, the City currently has two staff dedicated to web accessibility testing and a Web Accessibility Coordinator. The City has invested over 5,000 person hours in the analysis and remediation of applications and web pages to ensure accessibility compliance to the level of WCAG 2.0 AA.

While useful, automated checkers utilized at the City only account for approximately 50 percent of the required tests to monitor WCAG compliance. Manual checks help us to identify issues beyond what automated checkers are capable of and are done on a semi-annual basis for a sampling of web pages. Additionally, staff are responsible for monitoring reports, prioritizing issues to be addressed, and fixing priority issues.

Training and continued education plays a significant role in the overall efforts of achieving the target of fully compliant/accessible websites and applications. This work is ongoing. Staff training to create accessible documents is widely offered. A new introductory course on Digital Accessibility has been developed in addition to a course on WCAG-EM reporting for IT staff. Specific workshops for Web Leads (Digital Services Coordinators) and Digital Services Officers pertaining to effective alternative text and related subjects are also offered. The City has also created a Quality Assurance Centre of Excellence to empower City employees with the knowledge, tools, processes and technical support required to achieve accessibility compliance for business applications, web sites and documents.

Usability testing is a critical aspect of increasing accessibility that meets the needs of Ottawa residents. User testing has been done for some new projects and will continue to occur moving forward. The City has created a robust process framework that supports efforts to achieve accessibility compliance for business applications and web pages by: Identifying key areas of accessibility focus for the project intake, initiation, planning, design, implementation and post implementation phases; and, providing subject matter expertise in the area of accessibility requirements during the acquisition, development and implementation phase for new and existing applications and web sites.

Procurement is another critical consideration for achieving WCAG compliance. In 2019, the City completed a standing offer for accessibility services to streamline the acquisition of accessibility resources to complete WCAG-EM reports, remediate documents and provide on-going business support. Additionally, the City has

undertaken the following major initiatives to support procurement of WCAG-compliant goods and services:

1. The City implemented a standardized reporting format for vendor WCAG-EM reports.
2. Best practices guides have been created to ensure accessibility is considered and implemented as part of the software delivery process.
3. The City has developed specific questions to pose to potential vendors that better assists to gauge the level of accessibility compliance prior to software purchase.
4. The City has enhanced the wording for accessibility requirements and provides support to staff during the application acquisition phase by providing feedback on the relative level of accessibility compliance for planned purchases.
5. The City has worked with new and existing third-party vendors to describe our accessibility policy and ensure that accessibility is an integral part of their software roadmap.

As described above, the actions taken and the plans for the year ahead demonstrate the City's commitment to meeting the January 1, 2021 deadline. The City remains committed to achieving compliance with the WCAG requirements and to increasing accessibility for persons with disabilities.

I trust that this summary is satisfactory for your purposes.

Regards,

**M. Rick O'Connor, CMO, LLB|OMA, LL.B.**

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