

**Response to the  
Standard Development Committee's initial  
recommendations  
for the Information and Communication Standard  
(IASR, O. Reg. 191/11)**

City of Ottawa

18 October 2019

## Introduction

The City of Ottawa is pleased to comment on the initial recommendations of the Information and Communication Standards Development Committee. The City is committed to continuously adapt and improve its policies, practices and requirements to identify, remove and prevent barriers to information and communication. Clear standards allow residents and employees to request and/or receive accessible information, communication and other supports to enhance both their everyday experiences and their productivity. To ensure an inclusive society, people with disabilities must be able to participate fully and equally in the creation and use of information and communications.

As previously shared in correspondence with the province, like many municipalities across Ontario, the City of Ottawa has faced several challenges in meeting section 14, Accessible Websites and Web Content and indicated its non-compliance in both 2015 and 2017. The recommendations provided by the Standards Committee do not address the many layered intricacies associated with meeting the WCAG 2.0 AA requirement for websites and web content. Further, the on-going maintenance of WCAG 2.0 AA requirements on a municipal website include considerable on-going challenges and complex coordination from both a technical and resource-based perspective. The City's efforts in this area include the following:

- Staff training/re-training of accessible document creation and document compliance testing
- Web accessibility management of over 200 contributors posting to a website
- Inaccessible documents or documents created and made for print being required to be posted on websites at short notice
- Delays in posting City information with short deadlines while waiting for content to be made accessible
- Consideration of posting content in emergency situations
- Provincial legislation that requires inaccessible documents to be posted to a website. An example would be political candidates' financial statements - many are filled out by hand and must display a candidate signature through the [\*\*Municipal Elections Act, 1996\*\*](#)

### ***Information to be made available***

*88 (9.1) The clerk shall make the documents filed under sections 88.25, 88.29 and 88.32 available at no charge for viewing by the public on a website or in another electronic format as soon as possible after the documents are filed. 2016, c. 15, s. 45 (3).*

In this regard, the WCAG 2.0 AA requirements do not include consideration for content that is not fully compliant but that increases accessibility for residents (e.g. Open Government and general access).

While the City remains committed to the full implementation of the WCAG requirements, continuing to achieve and maintain full compliance requires a significant and on-going level of effort, time and resources. Rather than focus on strict adherence to a standard, staff have recommended 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. As a resource, staff have offered the City of Ottawa Web Accessibility Policy for consideration and review. This Policy outlines the requirements for maintaining, developing, and procuring accessible web content, websites and web applications. It also clarifies responsibilities in relation to reporting to Council and the Province with respect to compliance with the Province of Ontario's legislated requirements. Additionally, consideration of a web tool rebate program to address municipalities who may have limited resources for web tool purchasing to assist in the maintenance of web compliancy is requested.

A further detailed direction from the Province to clarify the documentation, requirements and types and frequency of reports to demonstrate on-going WCAG 2.0 AA compliancy status on an attestation reporting cycle and an on-going basis is requested.

Finally, staff have indicated that it is essential for the Information and Communications Standards Development Committee to include representation from the municipal IT sector and impacted organizations to preserve best interests and create predictable accessibility experiences for persons with disabilities in information and communication-impacted service offerings.

City staff agree that many of the initial recommendations of the Standards Development Committee meet the spirit of the *Accessibility for Ontarians with Disabilities Act, 2005*.

City staff have provided their additional feedback on the 30 recommendations below:

The City supports the offered change in objective of the Standard, as this simplified version may provide greater clarity to organizations and the public.

### **Recommendation 1: Feedback requirements**

The feedback requirements in Sections 11 and 80.50 of the regulation should be combined and placed in the General Requirements section of the regulation, ensuring both the format requirements of Section 11 and the specific requirement for a process in

Section 80.50 about goods, services and facilities remain. In addition, the committee recommends that clear definitions of the terms “feedback” and “communication” be included.

**Concur.** Staff fully support both the combining of requirements into the General Requirements section of the regulation and clarification of the definitions of the terminology “feedback” and “communication”.

## **Recommendation 2: Usage of portable document format (PDF)**

Government should not ban the use of PDFs for any obligated organization.

**Concur.** Staff supports the use of PDF for any obligated organization. PDFs are an important tool for the City to share information with the public. Further to the recommendation, staff support the further development of provincial tools and resources for increasing education to employees on how to make PDFs accessible.

## **Recommendation 3: Final review of regulatory language**

Government use the technical expertise of the Digital Inclusion Technical Subcommittee as a resource, as needed, to clarify intent and technical accuracy during the regulatory drafting stage related to Section 14.

**Concur.** Staff support providing greater clarity to the regulatory language of Section 14 to increase common understanding and usability. IT staff from municipalities, other public sector organizations and the broader IT sector should be represented in the Digital Inclusion Technical Subcommittee.

## **Recommendation 4: Products and product labels**

The Government of Ontario should meet with the Government of Canada to look for solutions to the problem of accessible products and product labels. These solutions may include clarifying jurisdictional authority over different products. In addition, it is recommended that Ontario meet with various industries to explore non-regulatory solutions to this issue.

**Concur.** While recognizing that the exemption of products and product labels is an accessibility barrier, a solution requires involvement of all levels of government that have jurisdictional authority.

## **Recommendation 5: Determination of suitability**

Change regulation 12.2 to state: “The obligated organization shall consult with the person making the request and gain agreement in determining the suitability of an accessible format or communication support.”

The intent of this recommendation is that the final decision on the suitability of an accessible format should not be left to the organization alone. Rather, both the organization and the person requesting an alternate format should work together to gain agreement on suitability. The committee recognizes that this may create an impasse, and this is partly what motivates Recommendation 7 (to follow). Despite the potential for an impasse, the committee feels this recommendation will result in improved accessibility. The committee recognizes that with this change, organizations may need time to adjust their processes, so it is proposed that it be effective six months after the amended regulation is in force.

**Concur.** This clarifies the City’s current practice and ensures that the alternate format suits the needs of the person.

## **Recommendation 6: Timely manner**

Change the regulation to state that organizations must provide accessible formats in a mutually agreed upon timely manner which considers the circumstances of the requester, and the urgency of his or her request.

The idea is similar to the intent of Recommendation 5, which is to ensure that important decisions that affect people with disabilities must be made with their participation. In this case, it would require that organizations and people with disabilities agree on what is meant by a timely manner. Again, the potential for disagreement is recognized, but the committee feels this recommendation will result in improved accessibility. As with Recommendation 5, the committee is proposing that this change become effective six months after the amended regulation is in force, to give organizations time to prepare and adjust.

**Concur.** This also clarifies the City’s current practice and provides greater consideration for the needs of the person.

## **Recommendation 7: Agreement between people with disabilities and organizations**

The issue of a lack of mechanism to address disagreement between organizations and people with disabilities in any section of the regulation should be referred to the Accessibility Standards Advisory Council.

The intent of this recommendation is for the council to investigate the creation of a mechanism to support the satisfaction of both people with disabilities and organizations, in relation to requirements under the act and regulation. The council is best positioned to examine this issue.

**Concur.** This recommendation would provide an avenue for the community to provide feedback that would be less onerous and costly to them than the Ontario Human Rights Tribunal. Should this recommendation be adopted, we would like additional information on the scope and membership of the Council.

## **Recommendation 8: Harmonization of Section 12**

The intent of this recommendation is to clarify requirements and eliminate confusion by ensuring they are contained in one section of the regulation. The committee feels that moving the requirement for accessible formats into the general requirements section of the regulation would also make it clear that this requirement applies to all of the standards, and not just to Information and Communications.

**Concur.** The harmonization of the accessible formats requirements to eliminate misunderstanding and provide clarity of applicability to all of the standards is strongly supported.

## **Recommendation 9: On-demand conversion ready formats**

The Government of Ontario and Legislative Assembly should produce a conversion-ready digital format of all public-facing materials and provide those materials on-demand:

‘on-demand’ in this case would mean immediately, meaning that it should already have been created

‘conversion-ready digital format’ means a format which has the properties it needs to be readily converted into an accessible format

The intent of this recommendation is to strengthen the idea that accessible formats should not be offered as an accommodation, to be provided only when requested and only after a delay. Accessible formats and communications supports are necessary from

the start as part of an accessibility foundation. This would be a significant new requirement for government, but given current technology, it is possible.

**Concur.** While not applicable to municipalities, the City encourages this recommendation as a best practice for emergency information, employment information, public engagement events and accessibility events.

### **Recommendation 10: On-demand ASL and LSQ translations**

The Government of Ontario should convene a meeting of deaf and hard of hearing stakeholders to determine which materials should be provided by the Government of Ontario to the public in ASL and LSQ translation. The committee recommends that following the meeting, the materials identified start to be made available on-demand.

The committee's intent is that the Government of Ontario find a fair and reasonable answer to the question of which types of materials should be available in ASL and LSQ on demand.

**Concur.** While this recommendation is not applicable to municipalities, the City currently offers ASL and LSQ at accessibility-specific events and supports departments to provide these services upon request at City events. In addition, feedback collected from the community during 2019 disability consultations for the multi-year accessibility plan reinforces the recommendation of increased offering of ASL and LSQ. In general, the City has observed that many organizations often overlook the provision of LSQ and more awareness about this language is needed. In the spirit of inclusion, staff support this recommendation.

### **Recommendation 11: Emergency requirements**

The emergency requirements throughout the regulation should be brought together and moved into the general requirements with no material changes to what is being required.

**Concur.** The compiling of emergency requirements together and incorporation into the general requirements section ensures greater clarity and understanding whilst avoiding repetitiveness.

### **Recommendation 12: Unacceptable emergency outcomes and preparedness**

Disability and accessibility should be front and center in the upcoming review of the Emergency Management and Civil Protection Act. To that end, the Minister of Community Safety and Correctional Services, who has responsibility for emergency

management, should involve people with disabilities in the review. The Minister should specifically include the Accessibility Standards Advisory Council. The same process should occur when the Fire Code is next reviewed.

**Concur.** While this recommendation is directed at a Provincial level, the City supports the inclusion of people with disabilities as stakeholders to contribute to the review the Emergency Management and Civil Protection Act as well as the Fire Code. City emergency plans are created based on international and accredited emergency management principles and practices some of which specifically focus on populations who are more vulnerable. In addition, the City continues to receive and respond to disability-related feedback from residents which can include recommendations on emergency management considerations to increase inclusivity and is responsive to people with disabilities and their unique needs.

### **Recommendation 13: Mobile applications and new technologies**

The intent of this recommendation is for both mobile applications which run from a website, and those which run as a standalone device but rely on the internet for function, would be subject to accessibility requirements under Section 14. These requirements would apply to the government and legislative assembly, the broader public sector and large organizations. For the purposes of Section 14, small organizations are currently exempt from accessibility requirements.

**Concur.** Currently, mobile accessibility is covered in both existing W3C WAI accessibility standards/guidelines and WCAG, and are included in our Web Accessibility Policy. There are no separate guidelines for mobile accessibility. Staff would like the Province to provide a stronger definition for “mobile applications”. Staff also recommend that any procurement pertaining to NATIVE mobile app development includes a clause stipulating that the relevant (mobile) WCAG 2.1 criteria be satisfied in additions to the already required WCAG 2.0 AA level attainment.

### **Recommendation 14: Procurement**

The committee’s intent with this recommendation is to ensure that digital procurement by the Government of Ontario and broader public sector organizations includes accessibility criteria, and that authoring and development tools that are procured are accessible.

The committee would also like non-digital procurement as required by the procurement requirement in the general requirements to be strengthened. Since this is beyond the scope of the committee’s mandate, the committee would like this work to be referred to



the Accessibility Standards Advisory Council and broader government bodies that manage procurement.

**Disagree.** Staff do agree with making digital procurement more accessible but the market for accessible authoring tools is not currently available in the industry. This recommendation is considered to have the potential of significant costly impact to municipal corporations. None of the current corporate authoring tools used, such as HTML editor, Drupal, CommonLook, Site Improve, or iCreate meet the ATAG requirements. Under the proposal any existing licenses would be exempt, but new authoring software would have to meet ATAG standard which would limit purchasing capacity as well as future software choices. Vendors often claim to be compliant but do not meet Provincial Standards in Ontario. Further, this does not benefit the community of persons with disabilities, and employees with disabilities are already accommodated through Workplace Accommodation Plans.

### **Recommendation 15: Differentiating organizations/high impact organizations**

The committee proposes the following: Create a definition for ‘high-impact’ organizations. One such definition might be an organization that has one or more Ontario employees and meets either of the following criteria:

- One million or more users in Ontario (free or paid)
- \$10 million or more in yearly global revenues
- These newly defined high-impact organizations would have to comply with the Information and Communications Standards and report under the act, and be subject to the same requirements as large organizations
- For businesses under federal instead of Ontario jurisdiction, or with no employees in Ontario, the province should engage in consultation with businesses and the federal government to determine and harmonize mechanisms to regulate them

**Concur.** This recommendation would have a positive impact as the engagement of “high-impact organizations” would incentivize the private sector/IT industry to prioritize accessibility as well as greater accountability of the accessible information and communication needs of the public. The adoption of this recommendation would also lend strength to the accessible procurement clause as the inclusion of these high-impact organizations would increase demand for accessible products across Ontario.

## **Recommendation 16: Significant refresh**

Currently, the requirements of Section 14 apply to organizations which either create new websites or significantly refresh existing websites. Stakeholder feedback and advice from the subcommittee suggested there is confusion about what ‘significant refresh’ means, as the term is subjective. In addition, the committee learned that since Section 14 requirements apply to websites that are new or significantly refreshed, some organizations are choosing to update their websites only a bit at a time, thus avoiding the requirements. This may actually result in reduced accessibility for users.

The committee proposes:

- Any content that is new or which an obligated organization changes, updates or adds to a website must meet the accessibility requirements of Section 14
- Furthermore, when content is added, changed or updated, it is recommended that organizations take the opportunity to make all content accessible
- The committee recommends that content should include all functions, interactions and ‘branding’ (look and feel) for a site. It is recommended that Section 14 include examples for the sake of clarity

The intent of this recommendation is to bring the Section 14 requirement closer to its intended function, which is to ensure that over time, organizations develop greater accessible content for users with disabilities.

**Concur.** Staff support this recommendation. The City’s Accessible Web Policy gives direction to this recommendation. The significant refresh clause must have a clear definition within the provincial legislation, which is not provided in this recommendation. There is concern that municipalities may not refresh their websites as it is not possible for them to become fully compliant to WCAG. A tool to monitor the accessible content on websites, such as SiteImprove, is highly recommended to capture accessibility advancements. Incremental improvements should be the goal for large, legacy websites. This clause should also ensure it aligns with other legislation, i.e. the *Municipal Elections Act*, 1996, which includes timelines where it may not be possible to post accessible content. Staff also request that all documents shared by the Province for posting by the City follow accessibility guidelines. There is a need for greater accessibility awareness and training of web developers and the IT industry to create accessible web sites and content.

## **Recommendation 17: Practicability**

Section 14 contains an exemption for obligated organizations which gives them the ability to claim that making a website accessible is ‘not practicable’. The committee feels that this term is too vague and might allow some organizations to avoid doing something they are actually able to do.

Clearly define the term “not practicable,” bringing it in line with the term “undue hardship,” as set out by the Ontario Human Rights Code. A link to this terminology has been provided in Appendix C.

The intent of this recommendation is to reduce how easy it is for obligated organizations to use vague wording in the standards as an excuse to not fulfil their requirements. Aligning the language with that of the Ontario Human Rights Commission would bring significant clarity, as both the Commission and the Human Rights Tribunal of Ontario have previously ruled on what undue hardship actually is.

**Disagree.** The Code prescribes only three considerations when assessing whether an accommodation would cause undue hardship: cost, outside sources of funding, if any, and health and safety requirements, if any. These considerations alone do not adequately apply to web accessibility. “Not practicable” is not necessarily synonymous with undue hardship. The City asks that the Province add further consideration to the definition of “not practicable” specifically regarding web accessibility to provide further clarity. In the IT industry, some of these considerations should include commercial availability and viability of accessible products.

## **Recommendation 18: Harmonization and application across requirements**

Section 14 is intended to bring about greater accessibility in websites. The committee noted, however, that websites are mentioned in different sections of the regulation, but only in Section 14 are the accessibility requirements explained. In the view of the committee, this makes it too easy for stakeholders to overlook or miss the requirements.

The committee proposes the following:

It should be made clear that Section 14 applies to all sections of the regulation. This could be communicated as a reference to Section 14 wherever websites are directly referenced in the regulation.

The committee’s intent with this recommendation is to make sure obligated organizations follow website accessibility requirements by reducing any confusion about what they are obligated to do.

**Concur.** Staff supports the recommendation to harmonize the regulatory language of Section 14 to increase common understanding and applicability across the Regulation.

### **Recommendation 19: Extranet exemption**

Section 14 covers internet, intranet and extranet websites, and in the process, it defines what these are. Intranet websites are websites that can be accessed from within a particular organization's network. Currently, not all organizations are required to make these sites accessible. Moving on to extranet websites, Section 14 defines these as websites which require a login. It considers these as an extension of intranets, and therefore also exempt for most organizations. The problem is that a great number of other internet websites that happen to require logins are therefore also considered extranets and so are exempt, which is certainly not desirable.

The committee proposes the following:

The exemption for public-facing websites with a log-in (previously referred to as extranets) should be removed and these types of websites should be required to comply with the regulation.

Timeframe: New public-facing websites with a log-in must comply by January 1, 2021, and all public-facing websites with a log-in must comply by January 1, 2023.

The intent of this recommendation is to completely remove the exemption for extranet websites, ensuring not only that these be required to comply with Section 14, but also that other internet websites not be able to avoid the requirement simply because they use logins. The committee recommends a longer timeframe for implementation as this would be a new requirement.

**Concur with an extension required to meet compliance.** This recommendation would highly impact City extranet sites used by departments to communicate with their partners/contractors, other agencies and residents such as the online learning system.

A scan has been undertaken by the City to determine how many extranets the corporation currently has, if they have been tested, when they are scheduled to be replaced and what the cost/effort would be to meet this recommendation by 2023. It is felt the 2023 timeline is unrealistic for achieving compliance given the time and resourcing required, and the associated web product compatibility testing and accessibility capacity-building or limitations of various programs.

While the City of Ottawa supports the move to an increase of accessible extranet websites, we believe that both a distinction and the compliance requirements should be different for Extranet public-facing websites with log-in and Business to Business

Extranet sites with log-in. Business to Business Extranet sites with log-in are typically used for external vendors to provide business services to the City and are not for the general public. An example would be a vendor who cuts trees on behalf of the City and is required to input their time into a work-order. These sites are designed to integrate with many internal business applications and must work as part of an overarching technical architecture that is both complex and difficult to change. In addition, in most cases Business to Business software applications lack the accessibility features required to support the proposed changes to the legislation. Consideration must be given for IT projects that make technical architecture changes that typically span multiple years due to the complexity and number of integrations and are much more detailed to meet accessible standards as compared to updating stand-alone web pages. Due to the intricacy and multiple points of integration, the City would require more time than was allotted for public-facing web pages (2014-2021). Currently the resources that are available to address accessibility issues are engaged in addressing the compliance requirements for public-facing web pages for the January 1, 2021 deadline. Capacity would not be available to support additional work until after the 2021 deadline.

In summary the City proposes:

1. That the legislation differentiates between public-facing websites with log-in and Business to Business websites with log-in
2. That Business to Business websites with log-in be excluded from the compliance requirements, however the city will remain sensitive to accommodating accessibility requests as they occur.
3. That in the event the current legislation changes, it will not be possible for the City to meet the proposed timeframes due to the complexity of the updates required.
4. That any further changes to the current legislation take in to account that resources allotted to ensure compliance of public facing web pages will not be available for implementing additional changes until after January 1, 2021.

## **Recommendation 20: Intranet exemption**

The exemption for employee-facing websites and content (previously referred to as intranets) should be removed and, like all other websites, these types of websites should be required to comply with the regulation.

For clarity, the committee recommends that all definitions related to a type of website be removed and that Section 14 simply apply to all websites, internet or intranet for all

obligated organizations. Because this would be a new requirement, the lengthy timeline (January 1, 2023) is recommended.

**Concur with an extension required to meet compliance.** Similar to Recommendation 19, staff are supportive of this recommendation, which would require that all platforms and content be made accessible to all employees for City internal facing web sites. Staff recommend a clearer definition of “intranet” be provided. Again, it is felt the 2023 timeline is unrealistic for achieving compliance given the time and resourcing required, and the associated web product compatibility testing and accessibility capacity-building or limitations of various programs on current intranet sites. Work around interdependencies may be even more complex with internal facing sites (i.e. payroll). Currently, staff with disabilities are accommodated through the Workplace Accommodation Policy, upon their request.

While the City of Ottawa supports the move to accessible features being implemented for Intranet sites many of the same integration issues exist for Intranet sites as does for the Extranet sites. Typically, Intranet sites are not stand-alone web pages but integration points for complex business applications that span multiple coordinated portions of the Cities technical architecture. Changes to these business applications and associated web pages are much more complex than making changes to stand alone public web pages. In addition, a change for one application may affect many other integrated applications. In addition, in most cases Business to Business software applications lack the accessibility features required to support the proposed changes to the legislation. IT projects that make technical architecture changes typically span multiple years due to the complexity and the City would require a greater number of years than was allotted for public facing web pages (2014-2021). Currently the municipal resources we have available to address accessibility issues are engaged in addressing the compliance requirements for public facing web pages for the January 1, 2021 deadline. As required by the AODA Employment Standard, City employees with disabilities are accommodated upon request.

In summary the City proposes:

1. That there is a recognition by the Minister of Seniors and Accessibility that changes to Intranet web sites will be significantly more complex to implement than what is required for public facing web pages.
2. That if the exemption for Intranet sites be removed, that the requirement to apply to new systems being changed to allow time for the industry to catch up to this new requirement.

3. That the legislation not be amended until after the compliance end date for public facing web pages of January 1, 2021.
4. That more than two years are provided to comply.

### **Recommendation 21: Pre-2012 exemption**

Section 14 provides an exemption from having to make web content accessible if that content was first published on a website before 2012. The committee discussed that this exemption has created two problems. First, some organizations are using this exemption as a loophole that enables them to continue using some content from pre-2012 websites on new websites. The second problem is that organizations are taking useful pre-2012 content, such as historical records, off their websites when they move to a new or refreshed website because they do not have the resources to make this content accessible.

A category should be created for older archived content. A potential model for this would be the federal Treasury Board archived content policy. This would grant an exemption only to non-active documents. Active content, which is anything that requires input or, like forms, can be changed, will not be covered under this exemption. Pre-2012 images used for navigation in refreshed websites must be made accessible.

The intent of this recommendation is to ensure that no content which is intended for active use can be exempt, and that inactive, archived content which is for informational purposes only can remain exempt.

**Concur.** Staff are supportive of this recommendation. The City of Ottawa has proactively created a repository for this type of older non-active content. This is a positive change for municipalities. This would allow organizations to divest older content and PDF's from the public facing websites and place them into e-archives. Organizations could then focus on making relevant and usable content accessible and only make archival information accessible "upon request", as per the City's Accessible Formats and Communications Supports Procedure. This should save the time and resources and would be a quick and inexpensive solution to the many PDF's that date back to before 2013.

A clearer definition of "active use" would be beneficial to include within this recommendation.

### **Recommendation 22: Live captioning and audio description**

Currently, the Government of Ontario and Legislative Assembly are the only organizations which must meet the live captioning and audio description requirements in

the Web Content Accessibility Guidelines (WCAG) 2.0. All other organizations are exempt from implementing this requirement.

The committee proposes the following:

By 2025, the exemptions to the WCAG 2.0 guidelines regarding live captioning and audio descriptions should be removed.

Between now and 2025, obligated organizations should put in place the infrastructure to support live captioning and audio description. Organizations which are currently exempt and are required to prepare a multi-year plan should include progress toward this infrastructure in their plan.

Timeline: Exemptions removed by January 1, 2025, to be evaluated for acceleration by the next committee.

The intent of this recommendation is to have obligated organizations plan infrastructure, adopt training, and generally get ready to implement live captioning and audio descriptions by 2025, or sooner if the next committee should choose to accelerate the timeline. The committee's intention is to establish a high standard (equal to CRTC standards for live captioning) of quality in live captions.

**Concur with a timeline extension.** The recommendation needs to have greater clarity on when captioning would and would not apply/be provided. For example, the City would require clarification if captioning would need to be provided for public engagement meetings or emergency broadcasting. At the City, captioning is already incorporated as a best practice during Council meetings. If it were offered for all City businesses, it could have a significant operational and budget impact. The timeline of 2025 does afford the City the opportunity to plan for budgeting and implementation. It is felt that this recommendation is reliant on the assumption that technology is commercially available and will efficiently and cost-effectively supply this level of service. We currently do not have this information. This is further complicated by the City's unique Bilingualism Policy, as the technology would need to support both English and French.

### **Recommendation 23: Web hosting location**

Section 14 only applies to content which organizations control either directly or through a contractual relationship that allows for modification of the product. The committee has learned that some organizations are interpreting this to mean that if their websites are hosted on servers outside the province, they may claim exemption from the Section 14 requirements.



The committee proposes the following:

Section 14 should apply to obligated organizations no matter where their web servers are located.

The intent of this recommendation is to clarify that the regulations apply to obligated organizations regardless of where their websites might be hosted.

**Concur.** Staff are fully supportive of this recommendation. This is already a best practice at the City of Ottawa.

While Part 6 Education and Training Facilities: Recommendations 24 through 30 does not have regulatory obligations that impact the City directly, staff offer the following feedback:

Recommendations 26: Increasing Captionist Capacity: Staff anticipate adoption of this recommendation would result in a greater pool of trained captionists available to support requests by people with disabilities within City services.

Recommendation 28: Accessibility in Education: It is felt this recommendation would increase future employees' accessibility awareness and training including e-accessibility.

Recommendation 30: Accessibility in Provincially Regulated Professions: This recommendation is strongly supported as it would yield certified accessibility-specific knowledge skillsets in provincially regulated workforce professionals employed at all levels of government including the municipal level.

## **Conclusion**

Barrier-free access to information and communications is essential for everyone in their day-to-day lives.

Through the pursuit of improved legislative clarity, businesses and organizations in Ontario will have the direction and tools to create, provide and receive accessible information and communications. An inclusive society that is supportive of people of all abilities, stands to benefit from this achievement.

Thank you for the opportunity to provide our comments.

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