

# Document 6 – City of Ottawa WCAG Compliance Agreement Plan Update

July 29, 2022

Ms Sopic,

Thank you for your email dated June 23, 2022, in which you acknowledge receipt of the City of Ottawa's update on compliance with section 14 of the Integrated Accessibility Standards Regulation (IASR) under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) provided on December 16, 2021, along with the City's Compliance Report.

We are pleased to read that our recommendations were submitted to the Policy division's consideration to inform policy changes and improvements in the standards update.

Also, thank you for reminding us that the Information and Communications Standards Development Committee previously reviewed the Information and Communications Standards, beginning its review in 2017 and finalizing its report to the Minister in 2020. We would be pleased to receive an update on how the Ministry's review of the report's recommendations is progressing, including whether there might be an opportunity to provide feedback on the feasibility of implementing same. As leaders in accessibility, including implementing legislation, the City of Ottawa would be pleased to participate in any working groups or other discussions with the Ministry that may be forthcoming.

With respect to the City's Compliance report, in your most recent correspondence, you have requested that the City "propose a feasible due date for the compliance plan, that will allow the City to continue to work towards full compliance" and "provide a few milestones and timelines to help us track your progress towards the due date".

As stated in our December update, the City currently has 43 public-facing web applications and websites, including Ottawa.ca, and monitors compliance progress annually. Of these assets, 40% are reported as conformant with WCAG 2.0 AA.

As noted in our earlier correspondence, departments across the organization responsible for each web asset have developed remediation plans to guide them as they work with their vendors to meet compliance at different times, based on the magnitude of the issues. Some departments have determined that their apps/website cannot be remediated to meet the standard. In these cases, a departmental budget is established to replace them.

As previously communicated, with so many separate remediation plans being executed across the corporation, procurement processes being undertaken and resources being re-deployed due to the COVID 19 pandemic, it is difficult to establish a date to when the entire City, as an organization, will be fully conformant with the WCAG 2.0 AA. Furthermore, with web content changing every day and it only requiring one error to make the City non-compliant, we anticipate that it will be difficult for the City to ever claim that it is fully compliant.

Nevertheless, we understand your request for greater detail about the City's progress with respect to web accessibility. To this end, below we have provided some highlights of the City's progress on web accessibility from the last year. Specifically, we have included an extract from a June 22, 2022 report to Ottawa City Council, which provides an update on the City of Ottawa's Multi-Year Accessibility Plan:

During 2021, the City continued to make improvements to the City's main website, [ottawa.ca](http://ottawa.ca), to become fully accessible. The City remains above the government industry benchmark in overall web compliance, including both HTML based web pages and PDF files. Utilizing the Siteimprove tool to constantly measure the accessibility of our site, the City's Web Leads closely monitor their respective departmental content to maintain compliance commitments. As of March 1, 2022, over 96 per cent of an inventory of 7,300 PDF files were fully accessible, according to Siteimprove's testing algorithms. Of the remaining four per cent, a significant portion of those files are alternatives to accessible HTML content that exists within the site.

The City is proud to note that as a result of its continuing efforts to increase web accessibility, the home page of [ottawa.ca](http://ottawa.ca) retains a position in the top five per cent of WebAIM's accessibility rankings. WebAIM is a non-profit organization based in the Institute for Disability Research, Policy and Practice at Utah State University. It conducts an annual accessibility analysis of the top one million web sites, based on site referrals. In 2021, the home page of [ottawa.ca](http://ottawa.ca) ranked 13,728 of the one million sites analysed. This is the highest known ranking among major municipalities in Ontario. [OCtranspo.com](http://OCtranspo.com) also ranks in the top five per cent and was ranked 18,913 of one million in 2021.

The City's Quality Assurance (QA) team assesses both public facing and internal facing applications and web sites for WCAG compliance and usability by people with disabilities. This team has completed hundreds of accessibility reviews using a variety of tools for both automated and manual testing. These staff are fully trained and certified testers who work closely with independent third-party accessibility companies to ensure the most positive user experience for individuals with disabilities.

The City has dedicated a tremendous number of staff hours to ensure new and existing applications meet or exceed current AODA legislated requirements. In addition, this team has been working with software vendors, internal development teams and Procurement to promote the importance of producing accessible applications and web sites.

The same report to Ottawa City Council also summarizes the City's annual progress in training staff at creating accessible documents:

### Accessible Document Training

Webinar-based training through Microsoft (MS) Teams continued in 2021, though numbers did drop during this year for a number of reasons. COVID-related staff reassignments, spending freezes and a training freeze during the software RFP process were factors contributing to a lower number of staff trained. While the overall number of staff trained dropped, the total number of training sessions did not as the demand for one-on-one mentorship and training sessions rose significantly over previous years. Approximately 30 one-on-one sessions for PDF or accessible documents training were conducted in 2021.

Accessible PDF training was suspended during the latter stages of 2021 during the RFP process for a PDF Accessibility software solution. Training will continue in 2022 and will be conducted by the vendor and be supplemented by in-house workshops offered in-house by ICSD staff. Additional courses related to source document accessibility and PDF accessibility basics will also be offered.

Finally, we draw to your attention to the City's procurement efforts in 2021 to improve web accessibility:

### Procurement

The corporation continues to ensure that City purchases include accessible design, criteria and features as prescribed by section 5 of the IASR. The City ensures that accessibility design, features and criteria are included where possible in procurement, regardless of dollar value. Departments track accessible procurement under \$15,000 using the Monthly Procurement Tracking form. This form was created in 2020 using Office 365 tools, making it available to all employees without the need for network access. In 2021, a Request for Proposals (RFP) was issued to seek the provision of software for the creation and/or remediation of accessible PDFs. The software is used by staff to validate PDF files against recognized industry standards for accessibility, such as WCAG and PDF/UA. Additional points were awarded for solutions for MS Office

based source file optimization, bilingual and accessible support of the software, as well as the vendor's ability to offer additional services such as website scans and auto-tagging of high volume, templated documents.

Upon review of all submissions, the selected vendor can fulfill all requirements to ensure the continued creation of accessible PDF documents, and can additionally meet the supplemental conditions stated in the RFP.

As demonstrated above, City staff have continued to update Ottawa City Council and the City's Accessibility Advisory Committee annually. The City of Ottawa is also supporting many other municipalities in this area by sharing information and tools, delivering training and offering guidance on their compliance plans.

As described above, the City continues its efforts towards reaching compliance with the WCAG requirement and is pleased to share its continued progress through regular reporting or through updates to our Compliance Plan Agreement.

We trust that this summary is satisfactory for your purposes and can further confirm that we will be pleased to provide details about our progress again in 2023.

Regards,

Rick

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