

2023 WCAG Compliance Plan Agreement Update

Attention: AODA.compliance@ontario.ca

To whom it may concern,

Background

The City of Ottawa has answered “no” to the following Accessibility Compliance Report question in 2015, 2017 and 2019:

Do your new internet websites and the content on them conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A? Yes or No (IASR s. 14)

With the Level AA requirement having come into effect on January 1, 2021, the City of Ottawa also answered “no” to the following question in the 2021 compliance report:

As of January 1, 2021, do all your organization’s internet websites conform to World Wide Web Consortium Web Content Accessibility Guidelines 2.0 Level AA (except for live captions and pre-recorded audio descriptions)?

As shared with the Province in previous years, the challenges related to the requirements contained in Section 14 remain, despite the City’s commitment to full implementation of the Web Content Accessibility Guidelines (WCAG) requirements. Significant effort, time, and resources continue to be invested to comply with this standard.

The City’s main public-facing website, ottawa.ca, which has approximately 10,500 pages, has been prioritized and is substantially in conformance, as described below. Many of the City’s other web assets that are not fully WCAG 2.0 AA conformant have undergone extensive remediation efforts to improve the usability and accessibility for all users.

By way of these updates, the City continues to recommend to the Province to mandate organizations to develop and implement an accessible web plan, policy and procedures, accessible procurement process, and training program(s) in order to achieve incremental and continuous website and web content improvements rather than strict adherence to the WCAG standards. The City has implemented and maintains all of these supports and resources, which have positively contributed to our success towards

meeting the standard. This includes the City's Web Accessibility Policy (2014), which provides corporate direction and requires the City's web assets to conform to WCAG 2.0 Level AA, unless not practicable to do so. Where compliance is not practicable, the Policy requires the City to meet as many success criteria as is practicable. The Policy set the standard to Level AA from its implementation and was reviewed and updated in 2023, as attached for your information.

The City of Ottawa has implemented all the recommended elements contained in the W3C's Web Accessibility Initiative Strategy toward web/digital accessibility. These include:

- Creating a policy
- Defining roles and responsibilities
- Determination of budget and resources
- Identification and review of websites assets
- Having a monitoring framework in place
- Engaging stakeholders
- Building skills and expertise
- Integrating goals into policies and procedures
- Assigning tasks to support delivery
- Evaluations, early and often
- Prioritization of issues
- Creating a tracking process

Additionally, the City has introduced a User Centered Design process that is applied to new (or refreshed) web assets. In this process, accessibility is considered in all phases.

Current Status

The City of Ottawa continues to advance its commitment to ensuring its main website, ottawa.ca, and its other websites are accessible, including internal-facing intranet sites, which are not yet legislated.

The City's decision to report non-conformance reflects the sheer volume of pages and the number of content contributors that the main ottawa.ca and other number of sites accommodate. This status acknowledges that due to the dynamic nature of content changes, it is impossible to confidently state that every content element on every single page within the sites fully conform to the WCAG 2.0 AA standard. That said, our commitment and goal to achieve or exceed that level remains intact.

ottawa.ca

For ottawa.ca, the City's main website, there have been improvements in the business processes since the beginning of 2022 to aid in our efforts. This is reflected through the significant improvement in WebAIM's annual accessibility rankings for our main website. 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 websites, based on site referrals. In 2023, ottawa.ca moved into the top 1% of all websites studied, ranking at 6,156, including no reported errors and an error density of 0.00%. This continues to be the highest known ranking among all municipalities in Ontario and a significant improvement over 2022's ranking within the top 5%.

City of Ottawa Web Assets Status

As stated in our December 2021 Compliance Plan Agreement Update, and reiterated in our July 2022 update, the City has 43 public-facing web applications and websites, including ottawa.ca, and monitors compliance progress annually. At that time, approximately 40% of those assets were reported as conformant with WCAG 2.0 AA.

Since this time, the City of Ottawa has significantly increased the number of public-facing web assets under its control. As of December 2023, the City now has 68 public-facing web applications and websites. Of these, approximately 51% are reported as conformant with WCAG 2.0 AA.

While the City of Ottawa has added numerous new web assets to its list this year compared to 2021, the significant increase in assets is also attributed to how websites are now identified and reported. Since the Information and Communications Standard of the IASR states that a URL is a subset of a URI, the City is now including both English and French public websites that are identical in content and compliance status but have different URL's.

Our ServiceOttawa branch works closely with the City's Quality Assurance team to ensure that new or updated features to all websites, both internally and externally facing, exceed legislated requirements. Across the corporation, we are now testing against WCAG 2.2 AA levels. Additionally, ServiceOttawa along with Information Technology Solutions (ITS) and our Procurement branch have been working on "agile procurement" processes, which reduce the risk of launching a new service with a non-compliant third-party solution.

During the RFP and pre-RFP stages we are working to better articulate accessibility needs to vendor's and assist on de-risking projects prior to, and post signing of contracts and Statements of Work. Quality Assurance testing is still on-going for both internally developed and third-party applications/sites, and we have seen a steady increase in requests for accessibility testing since the last update. Existing challenges with vendors remain in both understanding the accessibility requirements properly and delivering on them.

We continue to utilize SiteImprove, an automated monitoring tool, which continuously scans ottawa.ca and other City-controlled websites in order to report on accessibility issues. Representatives from all City departments can view their respective issues and run reports to be shared with their contributors. Quarterly reviews are also conducted by ServiceOttawa staff for ottawa.ca content. To prevent publishers adding inaccessible content to ottawa.ca, an accessibility specific plug-in was added to our content publishing tool. This allows content contributors to run a quick accessibility scan on their HTML-based content, prior to posting. This tool provides support for issues such as improper heading structure, missing alternative text and table structures, among other necessary checks.

Early 2022 saw the replacement of our previous PDF remediation tool, as the result of a competitive Request for Proposal (RFP) process. This meant that new courses were developed and deployed resulting in an improved understanding of accessible needs in relation to PDF documents. Over 50 staff received training in PDF accessibility fundamentals, while an additional 25 staff received advanced training utilizing the new software. We also continue to offer in-house training, such as our "Creating Accessible Documents – with MS Word" course, which over 140 staff have attended. Staff education and awareness remains a primary goal within the City of Ottawa.

A new Request for Standing Offer (RFSO) was issued in 2023 seeking external expertise to aid with our web and digital accessibility efforts when and where warranted. There are three main categories covered by the RFSO; Accessible Documents (creation and remediation), WCAG assessments and audits (including a formalized WCAG-EM report) and Training (related to several topics under the Digital Accessibility umbrella). This offer was finalized in December 2023.

Finally, we have also made significant advances in addressing accessibility issues with Microsoft products (primarily SharePoint, Power BI, and Dynamics Customer Voice) since the last update, which will not only benefit the City of Ottawa, but other Ontario municipalities and residents using MS products as well.

Web Policy

In 2022, a full review of the Corporate Web Accessibility Policy was conducted, and an updated version was approved by senior management in the first quarter of 2023. The refreshed version clarifies roles and responsibilities for accessible websites, applications, and their respective content. It was also future proofed to account for potential changes to the *Accessibility for Ontarians with Disabilities Act*, as well as the continual evolution of WCAG and other relevant web standards, such as PDF/UA (Universal Accessibility).

Conclusion

As demonstrated above, the City of Ottawa's commitment to making our digital information accessible to the public and to our employees has only increased.

Staff continue to provide annual updates on the City's progress to Ottawa's City Council and the City's Accessibility Advisory Committee. The City of Ottawa is proud to be a leader in this area, and also supports many other municipalities in this area by sharing information and tools, delivering training and offering guidance on their compliance plans. Additionally, a new sub-group of the Ontario Network of Accessibility Professionals has been created to support WCAG compliance, which is coordinated by staff at the City of Ottawa.

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 would be pleased to provide details on our progress again in 2024.

Regards,

David

DAVID G. WHITE

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