

**Subject: Provincial and Federal Multi-Year Accessibility Plans**

**File Number: ACS2024-OCC-0015**

**Report to Finance and Corporate Services Committee on 5 November 2024**

**and Council 13 November 2024**

**Submitted on October 25, 2024 by Tyler Cox, Manager, Legislative Services**

**Contact Person: Megan Richards, Program Manager, Accessibility**

**613 580-2424 x12752, [Megan.Richards@ottawa.ca](mailto:Megan.Richards@ottawa.ca)**

**Ward: Citywide**

**Objet : Plans d'accessibilité pluriannuels provinciaux et fédéraux**

**Numéro de dossier : ACS2024-OCC-0015**

**Rapport présenté au Comité des finances et des services organisationnels**

**Rapport soumis le 5 novembre 2024**

**et au Conseil le 13 novembre 2024**

**Soumis le 2024-10-25 par Tyler Cox, Gestionnaire, Services législatifs**

**Personne ressource: Megan Richards, Gestionnaire de programme, Accessibilité**

**613 580-2424 x12752, [Megan.Richards@ottawa.ca](mailto:Megan.Richards@ottawa.ca)**

**Quartier : À l'échelle de la ville**

## **REPORT RECOMMENDATION(S)**

- 1. That the Finance and Corporate Services Committee recommend that Council approve the 2025-2029 City of Ottawa Municipal Accessibility Plan, as outlined in Document 1 and Document 2 of this report.**
- 2. That the Finance and Corporate Services Committee recommend that Council approve the 2024-2026 OC Transpo Accessibility Plan, as outlined in Document 3 of this report.**
- 3. Receive the OC Transpo Accessible Customer Service Policy, as outlined in Document 4 of this report, to satisfy the feedback requirements under the *Accessible Canada Act*.**

## **RECOMMANDATION(S) DU RAPPORT**

- 1. Que le Comité des finances et des services organisationnels recommande au Conseil municipal d'approuver le Plan d'accessibilité municipal 2025 - 2029 de la Ville d'Ottawa, selon les modalités exposées dans les pièces 1 et 2 de ce rapport.**
- 2. Que le Comité des finances et des services organisationnels recommande au Conseil municipal d'approuver le Plan d'accessibilité d'OC Transpo 2024-2026, selon les modalités exposées dans la pièce 3 de ce rapport.**
- 3. Que le Conseil municipal prenne connaissance de la Politique sur l'accessibilité du service à la clientèle d'OC Transpo, selon les modalités exposées dans la pièce 4, afin de répondre aux exigences de la *Loi canadienne sur l'accessibilité*.**

## **EXECUTIVE SUMMARY**

Under section 4 (1) of the Integrated Accessibility Standards Regulation (IASR) of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), the City of Ottawa, as a “designated public sector organization” is required to “establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation”. The City is required to report on this plan annually, and the plan is to be updated and reviewed at least every five years. The current 2020-2024 City of Ottawa Municipal Accessibility Plan will expire at the end of 2025. As such, Document 1 of this report highlights the City’s requirements under the AODA and the initiatives that comprise the new 2025-2029 City of Ottawa Municipal Accessibility Plan (COMAP). A detailed listing of all initiatives included in this plan can be found in Document 2.

Additionally, under section 69 (1) of the *Accessible Canada Act* (ACA), OC Transpo, under the Transit Services Department, is a “regulated entity” and as such is required to “prepare and publish [...] an accessibility plan respecting [...] its policies, programs, practices and services in relation to the identification and removal of barriers, and the prevention of new barriers”. Prior to the creation of this new plan, while not Provincially regulated, OC Transpo has demonstrated its commitment to accessibility and meeting the “spirit and intent” of the AODA since the legislation came into effect. As such, OC Transpo has participated in the COMAP report, and compliance reporting as part of the City of Ottawa AODA Compliance Report, which includes adherence with all requirements under the AODA and the IASR.

As such, OC Transpo’s first Accessibility Plan under the ACA (Document 3) highlights their requirements under this federal legislation. All Transit Services initiatives are also included under the 2025-2029 COMAP.

Finally, under section 70 (1) of the ACA, OC Transpo as a “regulated entity” is obligated to “establish a process for receiving feedback about [...] the manner [it] is implementing its accessibility plan, and the barriers encountered by [its] employees and by other persons that deal with the [organization].” Through both the Corporate [Accessible Feedback and Resident Inquiry Procedure](#) and OC Transpo’s [Accessible Customer Service Policy](#), these feedback mechanisms already exist and are followed accordingly. As such, the feedback requirement is outlined in Document 4 to meet this obligation under the Act.

Under the Delegation of Authority By-law (No. 2024-265), Ottawa City Council has delegated to the City Clerk the authority to execute and file with the Government of Canada all accessibility reports and other information required under both the *Accessible Canada Act*.

To develop both legislated multi-year accessibility plans, the City is required to consult with persons with disabilities and the public. Additionally, under the AODA, the City must consult with its Accessibility Advisory Committee (AAC). From May to August 2024, following Council’s receipt of the 2024 COMAP Annual Update Report and consultation plan, the City’s Corporate Accessibility Office facilitated widespread consultation with collaborators across the City. The City’s Equity and Inclusion Lens was used as a guide to ensure that diverse perspectives were included. A full report on these accessibility consultations, and highlights of the feedback are included in Document 5.

The City’s first three accessibility plans to fulfill the obligations of the IASR under the AODA (COMAP 2012-2016, 2016-2020 and 2020-2024) focused primarily on how the

City of Ottawa implemented the applicable clauses contained in the IASR as they came into effect through their outlined phased approaches. Currently, all clauses under the IASR are in effect. With Council approval, the new 2025-2029 COMAP will launch on January 1, 2025, and the Corporate Accessibility Office will closely monitor any applicable legislated changes to the AODA and support the City to implement these updates as required. As such, the City's 2025-2029 COMAP will not only focus on maintaining compliance with all the Standards under the IASR, but also seek new, innovative ways to go beyond legislation, containing many non-legislated initiatives that will be implemented to address issues brought forward through the City's feedback mechanisms. The OC Transpo Accessibility Plan, as required under the ACA, will come into effect upon approval by Council. New requirements for Transit Services under the ACA will also be monitored by the Corporate Accessibility Office, and support will be provided to OC Transpo to implement these, as required.

The City is proud of its commitment to accessibility not only to meet the requirements of the AODA, but also exceed minimum standards where possible, while recognizing that barriers continue to exist and that there is still much work to be done to achieve full equity for persons with disabilities. Both the new COMAP and the OC Transpo Accessibility Plan includes new initiatives created from feedback received during the spring/summer 2024 COMAP consultations, from service requests, or from emerging best practices throughout Ontario, Canada and internationally.

## **SYNTHÈSE ADMINISTRATIVE**

En vertu du paragraphe 4 (1) du Règlement sur les normes d'accessibilité intégrées (RNAI) de la Loi de 2005 sur l'accessibilité pour les personnes handicapées de l'Ontario (LAPHO), la Ville d'Ottawa doit, en qualité d'« organisation désignée du secteur public », « [établir, mettre en œuvre, tenir à jour et documenter] un plan d'accessibilité pluriannuel qui décrit sommairement [sa] stratégie pour, d'une part, prévenir et supprimer les obstacles et, d'autre part, satisfaire aux exigences que leur impose le présent règlement ». La Ville doit rendre compte de ce plan chaque année, en plus de le mettre à jour et de le revoir au moins une fois tous les cinq ans. La version actuelle du Plan d'accessibilité municipal 2020-2024 de la Ville d'Ottawa arrive à expiration à la fin de 2025. La pièce 1 de ce rapport met donc en lumière les exigences que doit respecter la Ville dans le cadre de la LAPHO et les initiatives qui constituent le nouveau Plan d'accessibilité municipal 2025-2029 de la Ville d'Ottawa (PAMVO). Le lecteur trouvera dans la pièce 2 la liste détaillée de toutes les initiatives qui font partie de ce plan.

En outre, conformément au paragraphe 69(1) de la Loi canadienne sur l'accessibilité (LCA), OC Transpo, qui relève de la Direction générale des services de transport en commun, est une « entité réglementée » et doit donc « préparer et publier... un plan sur l'accessibilité concernant... ses politiques, ses programmes, ses pratiques et ses services en ce qui a trait à la reconnaissance et à l'élimination d'obstacles ainsi qu'à la prévention de nouveaux obstacles ». Avant de créer ce nouveau plan, alors qu'elle n'était pas réglementée par le gouvernement provincial, OC Transpo a fait savoir qu'elle s'engageait sur la voie de l'accessibilité et qu'elle s'obligeait à respecter « l'esprit et l'intention » de la LAPHO depuis que cette loi produit ses effets. OC Transpo a donc participé au rapport sur le PAMVO et aux comptes rendus de conformité dans le cadre du Rapport sur la conformité à la LAPHO de la Ville d'Ottawa, ce qui consiste à respecter l'ensemble des exigences de la LAPHO et du RNAI.

C'est pourquoi le premier Plan d'accessibilité d'OC Transpo dans le cadre de la LCA (pièce 3) met en lumière les exigences que doit respecter cette organisation en vertu de cette loi fédérale. Toutes les initiatives de la Direction générale des services de transport en commun font donc partie du PAMVO 2025-2029.

Enfin, conformément au paragraphe 70(1) de la LCA, OC Transpo est obligée, à titre d'« entité réglementée », « [d'établir] un processus pour recevoir de la rétroaction... sur... la façon dont elle met en œuvre son plan sur l'accessibilité... les obstacles auxquels se sont heurtés ses employés et les autres personnes qui font affaire avec elle ». Dans le document [Commentaires et demandes de renseignements des résidents à propos de l'accessibilité – Procédures](#) de la Direction générale comme dans la [Politique sur l'accessibilité du service à la clientèle d'OC Transpo](#), ces mécanismes de rétroaction existent déjà et sont donc appliqués. C'est pourquoi nous décrivons dans ses grandes lignes, dans la pièce 4, la rétroaction à recueillir pour s'acquitter de cette obligation en vertu de la Loi.

En vertu du Règlement municipal sur la délégation de pouvoirs (Règlement no 2024 265), le Conseil municipal d'Ottawa a délégué à la greffière municipale le pouvoir de signer et de déposer, auprès du gouvernement du Canada, tous les rapports sur l'accessibilité et tous les autres documents d'information exigés dans la Loi canadienne sur l'accessibilité.

Pour établir les plans d'accessibilité pluriannuels prévus dans les lois, la Ville doit consulter les personnes en situation de handicap et le public. De surcroît, en vertu de la LAPHO, la Ville doit consulter son Comité consultatif sur l'accessibilité (CCA). De mai à août 2024, après que le Conseil municipal ait pris connaissance du Rapport de compte

rendu annuel sur le PAMVO 2024 et du plan de consultation afférent, le Bureau de l'accessibilité de la Ville a animé une vaste consultation auprès des collaborateurs dans l'ensemble de l'administration municipale. Il a fait appel à l'Optique de l'équité et de l'inclusion de la Ville pour guider cette consultation afin de s'assurer de tenir compte de la diversité des points de vue. Le lecteur trouvera dans la pièce 5 le rapport complet de ces consultations sur l'accessibilité, ainsi que les traits dominants des commentaires recueillis.

Les trois premiers Plans d'accessibilité adoptés par la Ville pour s'acquitter des obligations du RNAI dans le cadre de la LAPHO (PAMVO 2012-2016, 2016-2020 et 2020-2024) mettaient essentiellement l'accent sur les moyens grâce auxquels la Ville mettait en œuvre les clauses pertinentes du RNAI et produisait leurs effets dans leurs approches étalées par phase et exposées dans les plans. À l'heure actuelle, tous les articles du RNAI produisent leurs effets. Avec l'approbation du Conseil municipal, le nouveau PAMVO 2025-2029 sera lancé le 1er janvier 2025, et le Bureau de l'accessibilité surveillera attentivement tous les changements pertinents apportés à la LAPHO et aidera la Ville à apporter les mises à jour nécessaires. C'est pourquoi le PAMVO 2025-2029 de la Ville ne sera consacré qu'au maintien de la conformité avec toutes les normes du RNAI, en plus de proposer des moyens nouveaux et innovants de faire plus que ce que la Loi exige, notamment en lançant de nombreuses initiatives distinctes de celles que prévoit la Loi et qui seront mises en œuvre pour corriger les problèmes relevés dans les mécanismes de rétroaction de la Ville. Comme l'exige la LCA, le Plan sur l'accessibilité d'OC Transpo entrera en vigueur dès qu'il aura été approuvé par le Conseil municipal. Le Bureau de l'accessibilité surveillera également les nouvelles exigences à respecter par la Direction générale des services de transport en commun en vertu de la LCA, et aidera OC Transpo à les mettre en œuvre, dans les cas nécessaires.

La Ville est fière de sa volonté d'accessibilité non seulement en respectant les exigences de la LAPHO, mais aussi en dépassant les normes minimums dans la mesure du possible, en sachant qu'il y a toujours des obstacles et qu'il y a encore beaucoup de travail à accomplir pour réaliser pleinement l'équité à l'intention des personnes en situation de handicap. Le nouveau PAMVO et le Plan d'accessibilité d'OC Transpo comprennent tous deux de nouvelles initiatives inspirées des commentaires recueillis durant les consultations du printemps et de l'été 2024 sur le PAMVO, des demandes de service ou des règles de l'art émergentes partout en Ontario, au Canada et à l'étranger.

## **BACKGROUND**

The implementation of the AODA and its regulations continues to be a priority for both City of Ottawa Council as well as its leadership and employees across all departments and service areas. The City has worked collaboratively with the Province of Ontario, the City's AAC and the community to implement the legislation and identify and remove barriers to City services, programs, and facilities.

Under the AODA, the City reports compliance to the Province every two years. Additionally, the City is required to provide an update on its accessibility plan annually. The City of Ottawa Municipal Accessibility Plan Update Report is presented to Council each year. As noted, the provisions of the AODA, and specifically its standards pertaining to transportation services, do not apply to OC Transpo as it is federally and independently regulated. However, OC Transpo provides annual accessibility updates through the COMAP report and has committed to meeting the "spirit and intent" of the AODA. Transit Services has undertaken several initiatives towards that objective, as outlined in Document 2. OC Transpo has also participated in COMAP, a legislated requirement under the AODA, since the requirement came into effect. This includes providing information in both the multi-year plan and the annual update report to Council.

OC Transpo will continue to provide updates through the COMAP report in addition to the new accessibility plan, mandated under the ACA. It is noted that there will be overlap of initiatives under these two accessibility plans. OC Transpo will also continue to adhere to the "spirit and intent" of the AODA, including compliance reporting with the City, in addition to meeting the new requirements under the ACA. The ACA also requires an annual update on OC Transpo's progress, with the next update due by June 1, 2025, which will be provided to Council alongside the annual COMAP update report.

The Ottawa Public Library and Ottawa Public Health, although governed by separate boards, report on AODA compliance with the City. Similarly, the Committee of Adjustment is an independent, autonomous tribunal appointed by City Council, which also reports on AODA compliance with the City. Ottawa Police Services is considered a separate "large organization" and as such abides by different compliance timelines.

## **DISCUSSION**

See Document 1 for the 2025-2029 City of Ottawa Municipal Accessibility Plan. See Document 2 for a full listing of the accessibility initiatives contained in the 2025-2029 COMAP. See Document 3 for the 2024-2026 OC Transpo Accessibility Plan. As stated

above, the initiatives of the OC Transpo Accessibility Plan are also found in Document 2, with the other City initiatives.

The City's 2025-2029 multi-year COMAP and OC Tranpo's Accessibility Plan focuses on:

1. Initiatives that strive to maintain compliance with the IASR of the AODA, which includes general requirements and the five Standards in the areas of: customer service, information and communications, employment, transportation, and the design of public spaces, as well as the requirements under the ACA
2. Implementing additional non-legislated initiatives to increase the accessibility of City services, programs and facilities. The non-legislated initiatives were identified by City departments in consultation with residents to go beyond current minimum standards to improve services or remove existing barriers to inclusion and participation.

As identified in both accessibility plans, the City remains committed to ensuring the accessibility of all programs, services, goods and facilities. Under the Office of the City Clerk, the Corporate Accessibility Office continues to work closely with staff across the organization to provide expertise regarding legislated accessibility requirements, and to ensure an accessibility lens is incorporated into all City services, programs and facilities.

Additionally, the initiatives featured within the 2025-2029 COMAP includes those that are both legislated and non-legislated to ensure the City meets all requirements under the IASR, while also going above and beyond by responding to the community's needs through their feedback.

The Corporate Accessibility Office will continue to provide transparent and accurate updates to the Province, Council, the AAC and the general public on the status of the City's compliance with the AODA and the ACA and the accessibility of its services, programs and facilities through annual updates. Updates on the progress of both plans will be provided to Council in the Spring of 2025, to adhere to legislative deadlines.

## **FINANCIAL IMPLICATIONS**

There are no financial implications associated with this report.

## **LEGAL IMPLICATIONS**

There are no legal impediments associated with Committee and Council's approval of the recommendations of this report.



## **ADVISORY COMMITTEE(S) COMMENTS**

The Corporate Accessibility Office consulted with the Accessibility Advisory Committee (AAC) on the content of the 2025-2029 COMAP as well as the 2024-2026 OC Transpo Accessibility Plan at a special meeting held on October 8, 2024. These meetings are also open to the public. At this meeting, three public delegates provided feedback regarding accessibility at both the City and OC Transpo, including a representative from the National Capital Association of the Deaf (NCAD).

Overall, the AAC is pleased with the City's commitment to ensuring accessibility in its programs, services and facilities, and actively encourages the continuation of incorporating accessibility into everyday business. However, some members continue to express concerns about existing accessibility-related barriers. Regarding COMAP, AAC members provided feedback on the positive aspects of both cross-disability targeted consultations, as well as employing an equity and inclusion lens when promoting consultations to ensure the voices of those with intersectional identities are included. Additional comments included emphasizing the need for safe and accessible infrastructure, including sidewalks and multi-use pathways, as well as providing accessible accommodations during public consultations.

Regarding the OC Transpo Accessibility plan, both the public delegates and AAC members expressed concerns regarding incorporating additional accessibility features on trains and buses, including a slower door closing time to allow passengers to find a seat safely, especially for those who are blind or have low vision and/or those who use mobility devices, expanding the number of available spots for those who use mobility devices on conventional buses, and being able to travel safely between train cars for those using mobility devices. Additional comments included the need for fare parity between conventional bus users and Para Transpo users, as well as the lack of accessible taxis, especially in rural areas. The delegate from NCAD also encouraged the incorporation of sign language interpretation videos on OC Transpo's web sites and social media accounts, especially during emergency situations such as trains being out of service.

The Corporate Accessibility Office provides an update on general accessibility matters at most regular AAC meetings. Both staff in the Corporate Accessibility Office and Transit Services remain committed to working with AAC members and City staff to address these ongoing concerns and develop effective mitigation solutions.

## **CONSULTATION**

The Accessibility Advisory Committee (AAC) has been advised of the City's status with respect to the AODA as well as OC Transpo's requirements under the ACA and has been consulted on both plans proposed through this report. The AAC continues to provide feedback to staff on City initiatives on an ongoing basis.

Extensive consultation with persons with disabilities and the public was conducted to develop these plans. A consultation outcome report can be found in Document 5.

## **ACCESSIBILITY IMPACTS**

This report satisfies the City's requirements under the AODA and ACA to remove or reduce barriers to accessibility. The numerous initiatives outlined in Document 2 all aim to reduce or remove barriers impacting diverse persons with disabilities, including visible and non-visible, temporary and permanent disabilities.

The City continues to demonstrate its commitment to accessibility by consulting with the AAC, community partners and the public on City projects that advance the accessibility agenda for City residents, visitors and employees in line with Council's Strategic Priorities.

## **ASSET MANAGEMENT IMPLICATIONS**

Many of the initiatives in the COMAP report positively affect the City's built environment and apply the City's Comprehensive Asset Management Policy Guiding Principles. They are customer focused and better enable its assets to meet future challenges, including changing demographics and populations, customer expectations, legislative requirements, technological and environmental factors. The City's COMAP initiatives continually improve City assets and are innovative to meet the needs of the City's residents, visitors and employees with disabilities. Work undertaken follows the City of Ottawa Accessibility Design Standards.

Comprehensive Asset Management (CAM) is an integrated business approach involving planning, finance, engineering, maintenance and operations geared towards effectively managing existing and new infrastructure to maximize benefits, reduce risk and provide safe and reliable levels of service to community users. This is accomplished in a socially, culturally, environmentally and economically conscious manner.

The initiatives outlined in Document 2 are consistent with the City's CAM Program objectives. COMAP supports a forward-looking approach to meet future challenges, including changing demographics and populations, legislative and environmental factors.

## **CLIMATE IMPLICATIONS**

Accessibility considerations are reviewed for projects that can positively affect the climate. Various initiatives that support both accessibility and climate implications are outlined in Document 2.

Reviewing accessibility and environmental impacts in a coordinated way ensures a better, more inclusive and environmentally sound product and service to all residents.

## **DELEGATION OF AUTHORITY IMPLICATIONS**

As per the Delegation of Authority By-law, the City Clerk is authorized to execute and file with the designated Provincial authority all accessibility reports and other information required under the *Accessibility for Ontarians with Disabilities Act, 2005*. Additionally, the City Clerk is authorized to execute and file with the designated Federal authority all accessibility reports and other information required under the *Accessible Canada Act*.

## **ECONOMIC IMPLICATIONS**

There are no economic impacts associated with this report.

## **ENVIRONMENTAL IMPLICATIONS**

The AODA, which governs the Provincially mandated work outlined in this report, has specific and general exceptions in the Design of Public Spaces section of the regulation, which protects the environment as described below:

Clause 80.15 Exceptions, general:

Exceptions to the requirements that apply to recreational trails and beach access routes are permitted where obligated organizations can demonstrate one or more of the following:

1. The requirements, or some of them, would likely affect the cultural heritage value or interest of a property identified, designated or otherwise protected under the Ontario Heritage Act as being of cultural heritage value or interest

2. The requirements, or some of them, would affect the preservation of places set apart as National Historic Sites of Canada by the Minister of the Environment for Canada under the Canada National Parks Act (Canada)
3. The requirements, or some of them, would affect the national historic interest or significance of historic places marked or commemorated under the Historic Sites and Monuments Act (Canada)
4. The requirements, or some of them, might damage, directly or indirectly, the cultural heritage or natural heritage on a property included in the United Nations Educational, Scientific and Cultural Organization's World Heritage List of sites under the Convention Concerning the Protection of the World Cultural and Natural Heritage.
5. There is a significant risk that the requirements, or some of them, would adversely affect water, fish, wildlife, plants, invertebrates, species at risk, ecological integrity or natural heritage values, whether the adverse effects are direct or indirect.
6. It is not practicable to comply with the requirements, or some of them, because existing physical or site constraints prohibit modification or addition of elements, spaces or features, such as where surrounding rocks bordering the recreational trail or beach access route impede achieving the required clear width. O. Reg. 413/12, s. 6.

## INDIGENOUS, GENDER AND EQUITY IMPLICATIONS

### **Indigenous Implications**

Through discussion with the City's Indigenous Relations Branch, the Corporate Accessibility Office has learned that their research shows that Indigenous peoples are disproportionately likely to experience disability, including mental health disability, in comparison to the general population. In our work to increase accessibility for all, the City strives to be mindful of Indigenous peoples, and work to build relationships to ensure the full inclusion of Indigenous persons with disabilities. This is reflected in the 2025-2029 COMAP as part of our commitment to an inclusive accessibility plan.

In developing the new COMAP and OC Transpo Accessibility Plan, staff included Indigenous organizations in its outreach. To promote sharing information and communications with Indigenous organizations, the AO has also sought advice from staff in the City's Indigenous Relations branch on how to develop relationships with organizations and communities that support Indigenous persons with disabilities. These efforts will continue.

## **Gender and Equity Implications**

In developing the new COMAP and OC Transpo Accessibility Plan, staff included organizations that support gender diverse persons and other members of the 2SLGBTQQA+ community in its outreach.

Additionally, the Corporate Accessibility Office participates on the cross-departmental Equity and Inclusion Interdepartmental Team, to ensure that women and gender diverse persons with disabilities are represented in the Women and Gender Equity Strategy. The Corporate Accessibility Office also continues to work closely with the AAC, which includes diverse gender representation amongst members, to inform our work.

## **RISK MANAGEMENT IMPLICATIONS**

Risk implications with this report are associated with non-compliance with the ACA, the AODA, the *Canadian Human Rights Act*, or the *Ontario Human Rights Code*.

Under the ACA, the Commissioner may conduct inspections, make a production order, a compliance order and impose administrative monetary penalties in accordance with the Regulation. Schedule 1 of the Regulation outlines whether an offence under the Act or Regulation is minor, serious, or very serious. Based on the contravention, administrative monetary penalties can range from \$1000 for minor, first violations, to \$250,000 for very serious, fourth or subsequent violations.

The AODA states that if it is found that a person or organization has contravened a provision of an accessibility standard or of any other regulation, the director may, by order, require the person or organization to do either or both of the following:

1. Comply with the accessibility standard or other regulation within the time specified in the order.
2. Subject to subsection (6), pay an administrative penalty in accordance with the regulations.

If a person or organization fails to comply with an order and no appeal of the order is made within the time specified, a director may, make an order requiring the person or organization to pay an administrative penalty in accordance with the regulations.

Every person who is guilty of an offence under the AODA is liable on conviction,

- a) to a fine of not more than \$50,000 for each day or part of a day on which the offence occurs or continues to occur, or

- b) if the person is a corporation, to a fine of not more than \$100,000 for each day or part of a day on which the offence occurs or continues to occur.

Furthermore, disability is a protected ground of discrimination under the Canadian Human Rights Act and Ontario Human Rights Code. If a person believes they have experienced discrimination on the basis of their disability, they can file an application with the Canadian Human Rights Tribunal or the Human Rights Tribunal of Ontario. Under Provincial law, such applications under the Code are more common than enforcement under the AODA.

## **RURAL IMPLICATIONS**

Information regarding all public consultations opportunities, which included several virtual meetings for increased accessibility, were shared with all rural Councillors for wide distribution to their constituents. Many initiatives contained in these plans also benefit rural residents. Additionally, as outlined in the COMAP initiatives, (Document 2) rural facilities are included in the City's Retrofits program which allows for upgrades to accessibility features. The OC Transpo Accessibility Plan also includes initiatives which benefit transit for persons with disabilities living in rural areas.

## **TECHNOLOGY IMPLICATIONS**

As described in the many of the Information and Communication initiatives contained in Document 2, technology plays a significant role in providing the City with the ability to meet the AODA accessible websites and web content clauses. The dedicated resources of the Technology Branch and the Web Services Branch are invaluable to the corporation in meeting and maintaining compliance with the IASR.

The City has also implemented all recommended elements contained in the World Wide Web Consortium's Web Accessibility Initiative Strategy, the governing body of the Web Content Accessibility Guidelines (WCAG). This includes the incorporation of various web/digital accessibility initiatives including, but not limited to, creating a Web Accessibility Policy, recently updated in 2023, defining roles and responsibilities, having a monitoring framework in place, engaging stakeholders, consulting the disability community and the Accessibility Advisory Committee, evaluating early and often, and creating a tracking process.

## **TERM OF COUNCIL PRIORITIES**

The City of Ottawa accessibility initiatives outlined in Document 2 directly impact and support Council's Strategic Priorities. All departmental initiatives are designed to advance equity and inclusion for the city's diverse population through continuous planning and execution of barrier removal in all City programs, services, and facilities. Intersectionality also is considered in accessibility plans ensuring alignment with other City efforts included but not limited to the efforts of the Women and Gender Equity Strategy, the Anti-Racism Strategy and the Reconciliation Action Plan.

## **SUPPORTING DOCUMENTATION**

Document 1: 2025-2029 City of Ottawa Municipal Accessibility Plan

Document 2: 2025-2029 City of Ottawa Municipal Accessibility Plan Initiatives

Document 3: 2024-2026 OC Transpo Accessibility Plan

Document 4: OC Transpo Accessible Customer Service Policy

Document 5: City of Ottawa Accessibility Consultation Report

## **DISPOSITION**

Efforts to meet AODA compliance requirements throughout the corporation are coordinated through the Corporate Accessibility Office. Specific initiatives, goals and programs outlined in the five-year plan have been assigned to operational departments and progress is monitored by the Office of the City Clerk. All City departments are responsible for the implementation of the City's COMAP plan and for compliance with the AODA and the IASR.

The Office of the City Clerk, in collaboration with Transit Services and OC Transpo, will submit updates on an annual basis as required. A new plan will be due by June 1, 2026. Any new requirements under the ACA will be monitored and implemented as applicable.