2024 City of Ottawa WCAG Compliance Plan Agreement Update

Attention: AODA.compliance@ontario.ca

To whom it may concern,

Background

The City of Ottawa (the "City") 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)*

In addition, when the WCAG 2.0 Level AA requirement came into effect on January 1, 2021, the City also answered "no" to the following question in its 2021 Accessibility 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 December 2023, and in previous years, the wording and measurement for this requirement remains challenging. However, the City's commitment towards WCAG compliance continues, with significant effort, time, and resources invested to comply with this Standard. Among the Ontario Network of Accessibility Professionals, the City continues to be recognized as a leader in this area. This leadership is also demonstrated by the expertise of our staff, many of whom have completed the International Association of Accessibility Professionals certification program to become a Certified Professional in Accessibility Core Competencies (CPACC), Certified Professional in Web Accessibility (CPWA), Web Accessibility Specialist (WAS) and Accessible Document Specialist (ADS). Staff have also completed, or are working towards finalizing, the NVDA (Non-Visual Desktop Access) Expert certification.

The City's main public-facing website, ottawa.ca, which has approximately 10,100 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 Level AA conformant

have undergone extensive remediation efforts to improve the usability and accessibility for all users.

The City continues to recommend that the Province mandate organizations to develop and implement an accessible web plan, policy and procedures, accessible procurement process, and training program(s) 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, and the principles of web accessibility. This includes the City's Web Accessibility Policy, which was created in 2014 and updated in 2023. The Policy provides corporate direction and requires that the City's web assets 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 City has implemented all the recommended elements contained in the World Wide Web Consortium's (W3C) 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 and will be discussed in further detail later in this update. In this process, accessibility is considered in all phases.

Current Status

As noted, the City 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 sites accommodate. This status acknowledges that due to the dynamic nature of content changes, it is difficult to confirm that every content element on every page within the site fully conforms to the WCAG 2.0 Level AA standard. That said, our commitment and goal to achieve or exceed that level remains intact.

The City's Primary Web Platform: ottawa.ca

There have been improvements in the business processes regarding ottawa.ca, the City's main website since the beginning of 2022 to aid in our compliance efforts. These improvements are reflected 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. WebAIM conducts an annual accessibility analysis of the top one million websites worldwide, based on site referrals. In 2023, ottawa.ca moved into the top one per cent of all websites studied, including no reported errors and an error density of 0.00 per cent. This continues to be the highest known ranking among all municipalities in Ontario and a significant improvement from the City's 2022 ranking within the top five per cent.

In the short time since the City's last update, in 2024, ottawa.ca has seen improvements in target areas, with a focus on task-based functionality and simplification in the delivery of content. A high priority has been placed on cognitive accessibility. The City has been diligent in ensuring conformance to the detailed success criterion of WCAG through varied approaches. With the inclusion of the formalized User Centered Design process, enhanced training, and the functionality of the Quality Assurance team within Information and Technology Services, greater emphasis has been placed on the cognitive aspects of digital content delivery.

Since 2023, a thorough analysis of existing content and processes has been performed within several key areas of our main website. Identifying and understanding end user needs has resulted in a significant increase in client satisfaction. Additionally, staff training including "Writing for the Web" and "Plain Language" courses are being reviewed and improved. This will continue to be a key focus in 2024 and beyond.

Another significant area of improvement in accessibility for ottawa.ca was changing the software used to document and track our service requests. This switch has increased the compatibility of our forms with all types of technological devices. The map component of the service request form, which was used for searching addresses and presenting results, was greatly improved for usability and accessibility. Additionally, this new software also reduced the number of system errors reported, and the overall look and feel of our forms were updated to match existing elements for a standardized user experience.

Along these same lines, since 2023 we have restricted the creation and uploading of PDF forms to one dedicated team. This team conducts a detailed review and testing process on all forms prior to publication, ensuring consistency and quality of product.

Finally, as part of our ongoing review and maintenance process, we made improvements to some high traffic areas of the website, which include:

- Improvements with the tabbing order and overall functionality within our faceted search options across the website;
- The Creation of an online search tool to facilitate property assessment inquiries, which is also fully conformant;
- Updating our "Cleaning the Capital" interactive map tool, with better labelling, heading structure and navigation instructions; and
- Adding visual and auditory progress indicators on forms and other tools/widgets that require greater loading time.

User Centered Design

The City has a dedicated team that focuses on users and their needs, including users with disabilities, during each phase of the design process. Utilizing a standardized process based on User Centered Design, the City continues its focus on delivering clear and concise information and ensure that the user experience is task-oriented, consistent, and fully accessible.

Whether deploying improvements or enhancements to ottawa.ca, or creating new websites or applications for other services, a well-defined and structured six-step process is invoked. The steps include:

1. **Vision** – Creating a clear statement outlining the objective and impact of the service/feature/update.
2. **Discovery** – Conducting research to understand the current user experience and the users' needs and goals.

3. **Design** – Developing and testing multiple prototypes to ensure it meets user needs identified in Discovery.
4. **Build** – Building and testing a fully functional version of the service to ensure it adequately meets user needs.
5. **Launch** – Releasing and monitoring service.
6. **Tweak** – Confirm service has met objectives and adjust if necessary.

In the Discovery phase, the team identifies specific user challenges, such as reliance on keyboard or mobile usage. During the Design phase, we integrate users with disabilities and older adults to perform user testing on prototypes whenever feasible. Finally, the Build stage includes code checks and multiple rounds of intensive WCAG conformance testing which includes screen reader, keyboard, and other end-user evaluation scenarios. Throughout the Discover, Design and Build phases, the team works closely with end users, routinely using various forms of user testing scenarios.

Following the Launch phase, the City further relies on feedback and live testing to ensure that the product meets all objectives and user requirements, including those that relate to accessibility. If the product does not meet its objectives, the City performs tweaks to adjust for any shortcomings through continual monitoring during the Tweak phase.

To further enhance the effectiveness and value of the User Centered Design team, a new full-time User Experience/User Interface (UX/UI) Designer position has been established. The primary focus of this role is to ensure consistent design and functionality across websites and applications.

City of Ottawa Web Assets Status

Currently, the City has 69 public-facing web applications and websites, including ottawa.ca. City staff monitor compliance progress annually. Approximately 50 per cent of those assets conform with WCAG 2.0 Level AA.

The City's main website, ottawa.ca, is a dynamic website containing over 10,000 pages published in both English and French. Content is updated on a constant basis by over 200 contributors. Over 90 per cent of current web pages conform with WCAG 2.0 Level AA criteria. The City's website continues to evolve, and as new features are added, or existing content is refreshed, stringent testing is conducted in accordance with our Corporate Web Accessibility Policy to ensure it meets or exceeds expected accessibility requirements. Additionally, ottawa.ca also contains approximately 10,000 PDF files, of

which 80 per cent conform to either WCAG and/or PDF/UA standards. Efforts to improve these ratios continues.

The ServiceOttawa branch works closely with the Quality Assurance (QA) 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, Information Technology Services (ITS) and the Procurement branch have been working on developing procurement processes which reduce the risk of launching a new service with a non-compliant third-party solution.

During the Request for Proposal (RFP) and pre-RFP stages, the City is working to better articulate accessibility needs to vendors, assisting with eliminating or reducing risk to projects, and post signing of contracts and Statements of Work. The QA team consistently collaborates with client groups to incorporate accessibility considerations throughout the product lifecycle. The QA team conducts accessibility reviews and provides consultations on specific accessibility requirements for vendor solutions, well before the RFP process begins. Additionally, the QA team contributes to the accessibility-related wording and content of RFPs, prior to their posting. Once the RFP closes, the QA team tests and validates that vendor solutions meet their stated compliance levels.

Before implementing third-party solutions, the QA team works with clients to ensure vendors fulfill their contractual obligations relating to accessibility compliance. The QA team frequently meets with vendors and clients to recommend tools and process improvements to ensure compliance, both before and after the go-live of their web assets.

For in-house developed applications, the QA team collaborates directly with project teams from the project kick-off to ensure accessibility features are considered and integrated into the final product.

With respect to software platforms that are not fully compliant, (i.e., Microsoft applications) the QA team works directly with vendors to identify and track accessibility concerns and re-test those platforms once fixes are provided. This ensures software applications are more accessible for the City of Ottawa, and benefits the vendor's other clients.

By adopting the approach described above, the QA team ensures solutions provide full functionality for residents on both desktop and mobile devices, exceeding current AODA requirements and enhancing usability for a broader audience.

Additionally, we continue to utilize SiteImprove, an automated monitoring tool, which continuously scans ottawa.ca and other City-controlled websites 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 an accessibility scan on their HTML-based content prior to posting, and promptly identify and rectify potential accessibility concerns. This tool provides support for issues such as improper heading structure, missing alternative text and table structures, among other necessary checks.

Following a competitive RFP process, a new PDF remediation tool was introduced in early 2022. New training courses have since been developed and rolled out to ensure staff have the knowledge and tools to create accessible PDF documents. Over 50 staff have received training in PDF accessibility fundamentals (utilizing Adobe Acrobat and PAC-ODF Accessibility Checker), while an additional 25 staff have received advanced training utilizing the new software. The City continues to offer additional 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.

A new Request for Standing Offer (RFSO) was issued in 2023 seeking external expertise to aid with our web and digital accessibility efforts. There are three main categories covered by the RFSO: (1) accessible documents (creation and remediation); (2) WCAG assessments and audits (including a formalized WCAG-EM report); and (3) training (related to several topics under the Digital Accessibility umbrella). This RFSO was finalized in December 2023 and is now in effect.

Finally, since our last update, the City has made advances in addressing accessibility concerns with Microsoft products (primarily SharePoint, Power BI, and Dynamics Customer Voice), which will benefit the City, other municipalities and residents using these products.

Conclusion

The City of Ottawa remains committed to making our digital information accessible to the public and to our employees. The City has further integrated accessibility into our processes, and we have made, and will continue to make, steps towards compliance with the AODA and the IASR.

Staff continue to provide annual updates on the City's progress to Ottawa City Council and the City's Accessibility Advisory Committee. The City is proud to be a leader in web accessibility and of its support to municipalities across Ontario, which is demonstrated by the City's sharing of information and tools, delivering training, and the guidance it provides to municipalities on their compliance plans. The City continues to coordinate both the Ontario Network of Accessibility Professionals and its Digital Subgroup, to support organizations with WCAG compliance.

While it has only been six months since our last update, the City continues its efforts towards reaching compliance with the WCAG requirement. We are pleased to share our continued progress through regular reporting or through updates to our Compliance Plan Agreement. Moving forward, we request that these updates be provided by December 31 to ensure the most robust response.

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 December 2025.

Regards,

Caitlin Salter-MacDonald

City Clerk