

City of Ottawa

2021 WCAG Compliance Plan Agreement Update

Background

The City of Ottawa has answered “no” to the following compliance report question in previous attestations 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 WCAG requirements. Significant effort, time, and resources continue to be invested to comply with this standard.

The City’s main website, ottawa.ca, which has approximately 10,500 pages, has been a priority and is very close to full 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 which improve the usability and accessibility for all users.

By way of these updates, the City will continue to recommend that instead of focusing on strict adherence to the WCAG standard, that the Province mandate incremental and continuous website and web content improvements through the development of an accessible web plan, policy and procedures, an accessible procurement process, and training program. The City has previously 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 indicates that the City's web assets "*shall conform to WCAG 2.0 Level AA unless not practicable to do so, and where not practicable to do so, that it meets as many success criteria as is practicable*". This Policy is attached for your information. The Policy set the standard to Level AA from its implementation and will be reviewed and updated in 2022.

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 has made significant progress since 2015 to make all its new and refreshed web assets both Level A and Level AA conformant. In reviewing our departmental web assets, we have identified those that are currently active, external facing, and assessed their conformance status. Many non-conformant and outdated assets have been removed.

The City has prioritized its main website, ottawa.ca, which contains approximately 10,500 pages of web content. As a whole, ottawa.ca is very close to conformance with both WCAG 2.0 Level A and AA criteria. SiteImprove, an industry leading QA and Accessibility reporting solution, grades ottawa.ca at 88.4 out of a 100, compared to an industry (government) average of 84.6. Additionally, ottawa.ca ranked in the top 1 percent for accessibility of all home pages tested during 2020 by WebAim. There are currently only known to be three Level A issues and one AA issue occurring on ottawa.ca. However, ottawa.ca is only one of the many City of Ottawa web assets.

Including ottawa.ca, the City maintains a master list of 43 current public-facing web applications and websites and monitors compliance progress annually. These other City of Ottawa websites and applications, which are owned and maintained by various City departments, have also seen much improvement with more than 40% of them now being reported as conformant with both WCAG Level A and Level AA.

In addition, the City has made great strides in remediating PDFs, which have been particularly challenging. The City currently has made 95% of its more than 9500 PDFs compliant. Outdated, non-conformant content (PDF) on our major websites has been removed. Remediation of complex PDF files are outsourced to 3rd party industry experts.

The City also currently manages 84 social media accounts across many platforms. While the City does not control the accessibility of these platforms, the City's Social Media Guidelines state, "The City of Ottawa respects the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA)* and is committed to creating a barrier-free city for its residents, stakeholders, visitors and employees regardless of their visible or non-visible disabilities. All communications, regardless of medium must adhere to the *Corporate Accessibility Policy* and its related guidelines." In 2022, the City is implementing additional accessibility resources and training for staff who post on social media to ensure it is accessible and linked to accessible content.

The City understands that dedicated staff are essential for working towards full WCAG 2.0 AA compliance. As such, most City departments now have a Web Lead (Coordinator, Digital Services) and an Officer, Digital Services,

who have specialized accessibility training, to ensure the standards are implemented. Additionally, the City currently has two staff dedicated to web accessibility testing as well as a Web Accessibility Coordinator whose duties include overseeing the complex nature of PDF accessibility. The City has invested countless hours in the analysis and remediation of applications and web pages to ensure accessibility compliance with WCAG 2.0 AA.

Training and education play a critical role in ensuring staff have the knowledge and tools to implement the standard. Staff training to create accessible documents is widely offered. This includes source file optimization in MS Word and PowerPoint as well as PDF accessibility utilizing a third-party remediation tool. Over 300 staff have been trained in accessible document creation, and over 100 have been trained in PDF accessibility and remediation techniques. An introductory course on Digital Accessibility is offered in addition to a course on WCAG-EM reporting for IT staff. Specific workshops for Web Leads (Digital Services Coordinators) and Digital Services Officers pertaining to effective alternative text and related subjects are also offered. In addition, the City has a Quality Assurance Centre of Excellence to empower City employees with the knowledge, tools, processes and technical support required to achieve accessibility compliance for business applications, websites and documents.

Procurement is another critical consideration for achieving WCAG compliance. In 2019, the City completed a standing offer for accessibility services to streamline the acquisition of accessibility resources to complete WCAG-EM reports, remediate documents and provide on-going business support. In 2020, a memo for contractors was created to clarify the accessibility requirements for all City web content.

In 2021, a Request for Proposals (RFP) was issued for the procurement of an updated solution for PDF remediation. The RFP also included a call for mass production of templated source files to accessible PDF, and a method for scanning and analyzing the standards-based conformance of published files across multiple websites.

User testing by persons with disabilities assists the City to evaluate new applications as well as existing content, including PDF files. The City has worked with organizations such as Fable, the CNIB and the Canadian Council of the Blind, in addition to staff participants, to conduct user testing.

As demonstrated above, the City of Ottawa maintains its commitment to accessibility and to reach conformance with this standard.

Supported by the ITS and ServiceOttawa branches, each of the City's web sites and web applications have been assessed to establish their degree of conformance with WCAG 2.0 Level AA. Departments responsible for each URL have developed remediation plans to guide them as they work with vendors to meet compliance. Some departments have determined their apps/website cannot be remediated to meet the standard. In these cases, a departmental budget is established to replace them.

The City continues to update City Council, the Accessibility Advisory Committee and the public annually on its progress, through the City of Ottawa Municipal Accessibility Plan update report. The City also continues to be a leader in web accessibility, supporting other public sector organizations provincially and nationally, by sharing information and tools, delivering training and offering guidance on compliance plans.

As described above, the City continues its efforts towards reporting compliance with AODA's web standard and is pleased to share its continued progress through regular reporting or through updates to our Compliance Plan Agreement.

I trust that this summary is satisfactory for your purposes.

Regards,

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