

# City of Ottawa WCAG Compliance Plan Agreement Update - December 2020

December 21, 2021

Sent on behalf of City Clerk M. Rick O'Connor:

To whom it may concern,

Thank you for your e-mail dated October 2, 2020, requesting an update to the City of Ottawa's compliance plan with respect to its progress to conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A for web assets.

As you are aware, the City of Ottawa has answered "no" to the following 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)***

As previously communicated, the requirements contained in Section 14 have presented numerous and complex challenges. The City is committed to full implementation of the WCAG requirements. To that end, significant effort, time, and resources continue to be invested to conform with this standard. The City has continued to make progress on Ottawa.ca, the City's main website and the more than 80 other City websites and applications, which has resulted in much greater accessibility for all users, including persons with disabilities.

Also, as noted in the City's October 17, 2019 submission to the Information and Communication Standards Development Committee, the City continues to recommend that instead of focusing on strict adherence to this standard, that the Province mandate incremental and continuous website and web content improvements to increase accessibility, the development of an accessible web plan, policy and procedures, a procurement process, and training program. The City has previously implemented all of these supports and resources.

Most significantly, in 2014, the City implemented a Web Accessibility Policy, 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 City's 2014 Policy, established a standard to level AA from the beginning, unlike the way it is captured in the IASR with two different compliance timelines. This was a strategic decision to:

avoid the confusion of monitoring two standards with complimentary requirements, find efficiencies by working on conformance with both WCAG levels simultaneously, avoid slowing down progress as many level A requirements are more difficult to meet than Level AA requirements; and, ensure City web assets became as accessible as possible in the shortest timeline.

### **Current Status:**

The progress the City has made since 2015 to make all of its new and refreshed web assets both level A and Level AA is significant.

The City has prioritized its main website, ottawa.ca, which contains approximately nine thousand pages of web content and it is currently very close to conformance with both level A and Level AA. SiteImprove, an industry leading QA and Accessibility reporting solution grades ottawa.ca at 96 out of a 100, compared to an industry (government) average of 75. Based on our reporting there are currently only six level A issues found on ottawa.ca impacting 42 pages and one level AA issue. Currently, more than 99.5% of pages have no issues and most of the remaining issues, which are content related, will be cleared out by year end. By January 1, 2021, less than 0.5% of ottawa.ca pages will have issues. However, ottawa.ca is only one of the many City of Ottawa web assets.

The City maintains a master list of its more than 80 other public-facing web applications and websites and monitors progress on their compliance status. These smaller City of Ottawa websites and applications, which are owned and maintained by various City departments, have also seen much improvement with more than 30% certified as compliant with both 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 78% of its more than 7800 PDFs compliant.

### **City of Ottawa Compliance Plan Agreement:**

For the reasons outlined above, the City will continue to answer "No" to the question about level A conformance on its by-annual AODA Compliance Reports. It will also in

2021 be reporting non-conformance with the level AA requirement. It will however continue 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 that are still not conforming, have been assessed to establish their degree of compliance with WCAG 2.0 level AA. Departments responsible for each URL 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.

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 all the City will be fully conformant to the level A and level AA requirement and thus be compliant with section 14 of the IASR.

Also, as discussed above, we are working on meeting the level A and level AA requirements simultaneously therefore, going forward the City requests that this Compliance Plan Agreement serve for both requirements.

The City has continued to update City Council and our Accessibility Advisory Committee annually. It 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.

I trust that this summary is satisfactory for your purposes.

Regards,

**M. Rick O'Connor, CMO, LLB|OMA, LL.B.**

City Clerk | Greffier municipal

Certified Specialist (Municipal Law: Local Government) |

Spécialiste agréé (Loi sur les municipalités : administration locale)

City of Ottawa | Ville d'Ottawa

Tel. | Tél. 613.580.2424, ext. | poste 21215

[rick.oconnor@ottawa.ca](mailto:rick.oconnor@ottawa.ca)