## AODA Compliance Plan Agreement Letter to the Accessibility Directorate of Ontario

Alfred Spencer

Director, Accessibility Directorate of Ontario

AODA Assistance (MEDG/MRIS),

This letter is in response to your verbal request for information related to the City of Ottawa's 2015 compliance report under the *Accessibility for Ontarians with Disabilities Act*, *2005*. More specifically, this letter responds to your request for information in reference to an update on our progress to meeting the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A in our City websites and web elements as the City answered "no" to the 2015 compliance report question:

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 shared in our correspondence with your office dated August 26<sup>th</sup>, 2016, like many municipalities in Ontario, the City of Ottawa has faced a number of challenges in meeting the WCAG requirements, including challenges of a technical and resource nature. While the City remains committed to full implementation of the WCAG requirements, meeting full compliance requires a significant and on-going level of effort, time and resources.

Despite changing the City's contractual Terms and Conditions governing the procurement of new websites and applications in 2011, requiring that all new websites and applications meet **WCAG** standards; some products received from vendors since then are not fully compliant.

The nature of the WCAG standard and the compliance question requiring a simple "yes" or "no" is a very high threshold. While we have continued to make progress each year on our over 30 websites and over 40 applications, there is a large volume of information being published by more than 200 publishers and contractors on a daily basis. Therefore, a certain degree of error is inevitable. To respond in the affirmative to the WCAG question is therefore highly problematic as it would only take one error on one of our 40 thousand web pages of one of our websites or web applications to nullify that answer.

Since January 1<sup>st</sup>, 2014, the City's various departments have procured and/or significantly refreshed more than twenty (20) websites and web applications subject to the WCAG 2.0 A standard and although all of them are more accessible than they were prior to the refresh, some WCAG issues and errors still exist in many of them. For example, consultants have advised that the use of maps have been particularly difficult to make compliant. Despite our continued reporting of non-compliance with this

standard, significant effort is put into ensuring that the City's web sites and web applications continue to progress towards compliance with the standard.

City of Ottawa Compliance Plan Agreement:

In order to reach compliance by January 1<sup>st</sup>, 2021, for each of the City's web sites and web applications that are still not compliant, departments responsible for each URL have assessed the degree of compliance with WCAG 2.0 Level AA and have developed a plan with their vendor to meet compliance at different times, based on the magnitude of the issues and the likelihood of the site or application being significantly refreshed or replaced prior to 2021.

For example, the Ottawa.ca website, which contains nineteen thousand pages of web content will only be compliant by the end of 2020. This website, which is the City's main website, was significantly refreshed in late 2016 so that the framework is WCAG 2.0 level AA compliant. Through the process, web content was migrated and some accessibility improvements were made. Beginning in 2017, work was undertaken to train the more than 200 content contributors throughout City departments on WCAG techniques, to make all nineteen thousand pages of web content compliant by the end of 2020.

Many City branches including Information Technology Services, Legal Services, Supply Services, Web Services Branch and the Corporate Accessibility Branch have been collaborating to:

- Clarify the required accessibility standards;
- Identify roles and responsibilities;
- Ensure procedural documents are clear;
- Ensure consistent use of training material and procurement toolkits; and,
- Communicate the importance of this requirement with our consultants.

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,

[ORIGINAL SIGNED]

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