OVERVIEW:

- The Accessibility For Ontarians With Disabilities Act, 2005 (AODA) was enacted to develop, implement and enforce accessibility standards to achieve accessibility for people with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises, by January 1, 2025.
- The AODA provides that standards will be developed by Provincial Standards Development Committees (SDCs), made available for public comment, reviewed and revised by the SDCs and eventually be adopted by Provincial Regulation.
- The first set of accessibility standards, Accessible Customer Service Standards, came into force on January 1, 2008, require compliance by the City by January 1, 2010, and will be the subject of a separate report.
- The second set of accessibility standards, the proposed Accessible Information and Communication Standards, were released for public review in November 2008 with a deadline for comments of February 6, 2009.
- This report provides an overview of the proposed Accessible Information and Communication Standards, with language largely extracted from the proposed Standards, an outline of staff comments and recommended comments to be submitted to reflect the City’s position with respect to the proposed Standards.

Recommendations:

1. That the report of Wendy Goss, Accessibility Coordinator, Council and Administrative Services, Corporate Services, dated January 6, 2009 re: Response to Proposed Accessible Information Standards be received.
2. That the comments set out in this report be approved as the City's comments on and response to the proposed Accessible Information and Communication Standards and that a response be forwarded to the Ministry of Community and Social Services.

Background:

The Accessibility For Ontarians with Disabilities Act, 2005 (AODA) was enacted in June 2005 and provided direction to develop, implement and enforce accessibility standards to achieve a fully accessible Ontario for people with disabilities by January 1, 2025. The AODA identified the need for accessibility standards in the following areas:

1. Customer Service (now enacted and in force)
2. Information and Communication (subject of this report)
3. Built Environment (in development)
4. Employment (in development)
5. Transportation (in development)

Legislation for the first set of accessibility standards came into force on January 1, 2008. The Accessible Customer Service Standards, Ontario Regulation 429-07, address what organizations must do to make the provision of their goods and services more accessible to people with disabilities. The City must be compliant with these Standards by January 1, 2010. Information regarding implementation of these Standards will be the subject of a separate report.

In November 2008, the second set of standards, the Proposed Accessible Information and Communication Standards, were released for public review. The scope of these proposed Standards includes the establishment of accessibility requirements for:

- Four broad categories of communication, defined as:
  - Prepared communication to someone
  - Predictable communication from someone
  - Unprepared communication to someone
  - Unpredictable communication from someone

- Information Technology (IT)-based information and communication systems,

- Business enterprise systems, and

- Individual accommodation.
Public comments regarding these proposed Standards must be submitted to the Ministry of Community and Social Services by February 6, 2009. The public feedback will be reviewed and used by the Province’s Information and Communication Standard Development Committee (IC-SDC) as they finalize the Standards for the Province to consider implementing through regulation.

**Overview of Proposed Standards**

The proposed Accessible Information and Communication Standards (Standards) consist of seven sections and three Schedules. The following is a list of the sections and a brief overview of the information covered by each section. A copy of the detailed Proposed Accessible Information and Communication Standards is attached as Appendix A.

Please note that the use of the noun “supports” throughout the proposed Standards and the discussion herein (e.g. “Electronic version with supports for comprehension”) refers to the mechanisms proposed or in place to assist with achieving accessibility or implementing the Standards.

1. **Application of Standards**

This identifies the classes of organizations and the timelines proposed for compliance with the Standards:

- **Class 1**  
  Private Sector or non-profit organizations with 1-19 employees, by December 31, 2013

- **Class 2**  
  Private Sector or non-profit organizations with at least 20 employees, by December 31, 2012

- **Class 3**  
  Public Sector organizations with 1 employee or more, by December 31, 2011

The City is a Class 3 organization and would have to comply with the Standards by the end of 2011.

2. **Organizational Requirements**

This section addresses the requirements to accommodate an individual’s needs under the Ontario Human Rights Code by providing the individual with the same:

- Amount of time to review, respond or use the information and communication provided
- Quality (of what is undefined in the Standards) that is equally up-to-date, complete and accurate to that available to others
- Availability in terms of time and place as is available to others
This section also addresses an organization’s requirements to:

- Develop, implement, maintain and document policies, practices and procedures including the availability of information and communications in plain language and the provision of communication assistance upon request
- Develop and maintain a statement of commitment to accessible information and communication
- Establish processes for receiving and responding to user requests, feedback and complaints
- Address the cost for information and communications in alternate formats
- Advise of the availability of accessible information and communications
- Provide training and guidance for employees, volunteers and others who design or provide and receive information and communications on behalf of the City
- Provide emergency and public safety information where required under existing law in a format that takes into account the person’s disability and in a format or method appropriate for that type of communication.

3. IT-based Information and communication systems

This section refers to the accessibility of information and communication systems used to deliver or receive information or communications through a computer. This includes but is not limited to Web sites, software applications and computer-based telecommunication systems. This area addresses:

- New systems with an accessible user interface and content file format by default when made available for use by employees or the public
- New content delivered through existing information and communications systems and the availability of an accessible digital format.
- Accessibility of existing IT-based system software user interfaces

The noted systems must meet the technical requirements identified in Schedule 1 - Information and Communications Technical Requirements of the Standards.

4. Business Enterprise Systems

This refers to large and complex information technology applications capable of supporting fundamental (internal and/or external) business processes that are critical to the continued operation and growth of the organization. (For the City’s purposes, this would include such systems as PeopleSoft, IMS, etc.) The section addresses:

- Newly acquired business enterprise systems
- Not yet deployed or implemented business enterprise systems
5. **Accessible Formats and Methods**

This section deals with the capacity to provide information and communication in accessible formats and methods:

- When requested by a person with a disability
- In a format that takes into account a person’s disability
- In a format or method appropriate for the type of communication
- That meet the technical requirements outlined in Schedule 1 – Information and Communications Technical Requirements
- In accordance with the requirements of the Ontario Human Rights Code

The following types of accessible information and communication are addressed:

- **Prepared Information**
  - Print
  - Static Web Page
  - Electronic version with supports for comprehension
  - Dynamic Web Site
  - Spoken or audio recording
  - Video recording
  - Electronic text file
  - Software applications

- **Predictable Communication**
  - Speech
  - Typing and/or pointing device
  - Personal signature
  - Handwriting
  - Mechanical controls
  - Touch controls
  - Biometrics

- **Unprepared Communication**
  - Spoken message in person
  - Spoken message over a phone, other mobile device or computer
  - Live text messaging
  - Live video conference

- **Unpredictable Communication**
  - Speech
  - Typing and/or pointing device
  - Handwriting
• Sign language interpretation, intervention, note taking and real-time captioning services and personal communication assistant:
  o Provision of services for pre-arranged appointments that have significant personal impact for an individual
  o Acceptance of communications using these assistive methods

6. Requirements for Educational Organizations and Regulatory Bodies

Educational organizations are the primary focus of this section. It addresses the provision of training or education, including but not limited to elementary, secondary, and post-secondary public, private, and not-for-profit organizations.

7. Accessible Municipal and Provincial Elections

This section addresses accessible Municipal and Provincial Elections including:

• Voting
• Candidates

Schedule 1 - Information and Communications Technical Requirements

Schedule 1 identifies the technical requirements for the following:

• Accessible Web Pages / Websites
• Accessible Electronic Form
• Accessible E-Text
• Supports for Comprehension for information in electronic form
• Captioning
• Video Description
• Accessible Software and User Interface
• Braille Ready Electronic Format
• American Sign Language (ASL) or Langue des signes Québécoise (LSQ) interpretation
• Alternative to Biometric identification
• Real-time captioning
• Alternative to Personal Signature
• Direct access using a personally optimized assistive technology or personal mobile device

Schedule 2 – Boards, Commissions, Authorities and Agencies

This is a list of provincial agencies and affiliates that must comply with the proposed Standards.
Schedule 3 – Broader Public Sector

This is a list of the Broader Public Sector organizations that must comply with the proposed Standards.

Current Situation:

Staff Comments

Staff from Corporate Communications, Information Technology and the Accessibility Program have reviewed the proposed Standards and provided comments. Specific comments received are attached as Appendix B.

Staff comments are consistent with the preliminary submissions drafted by other organizations such as the AMCTO and AMO. Accessibility staff recently attended a Provincial Public Consultation session for the proposed Standards and most comments by representatives from other attending municipalities and agencies are consistent with the City’s Comments.

A brief summary of the comments is as follows:

- Standards are at times vague and unclear, and at other times so specific as to be restrictive and inflexible.
- Timeframes for implementation are not achievable.
- Implementation costs are significant (a cost impact assessment was commissioned by the Accessibility Directorate of Ontario, prepared by KPMG and released at the same time as the proposed Standards).
- Organizations have limited access to and control over availability of software, systems and resources.
- There is a disconnect between provincial requirements and national/international industry standards.
- Regarding timeliness and ability to provide information and communication in alternate formats – immediacy is unreasonable.
- Focus should be on implementation of public interfaces such as the website and front facing public services.

Specific Feedback

It is recommended that Council support the following comments regarding the proposed Accessible Information and Communication Standards to be submitted to the Ministry of Community and Social Services.

The City of Brampton supports the intent of the proposed Accessible Information and Communication Standards based on the following considerations:
1. **The timeframes and structure for compliance should be extended and adjusted to allow for training, planning and implementation periods.**

The Standards as proposed require implementation within two years. This is not achievable. The following must be included as part of the implementation process.

**Training Period** – Prior to planning for and implementing the Standards, the Province should be providing training on the technical requirements and expectations identified in the Standards to ensure they are implemented as intended.

**Planning Period** – A planning period should be incorporated prior to implementation of the Standards to allow municipalities and organizations to review their current programs and prepare an implementation plan which will take into account municipal planning and budgeting cycles. Implementation plan should include quick fixes that could be implemented readily with little or no impact on the municipality.

**Implementation Period** – Implementation of the Standards should be extended over a longer period of time in order to meet planning and budgeting cycles and at the same time meet the intent of a fully accessible Ontario by 2025.

A longer implementation period will allow current technology and vendors/suppliers to catch up with technical requirements.

2. **Initial focus of the Standards should be the public interfacing services provided.**

The City recognizes that the provision of communication with the public is of primary importance. Internal services are broader ranging, more complicated to bring into compliance and more easily dealt with through individual accommodation.

3. **Issues related to employees should be addressed through accommodation for each individual.**

Individual accommodation is more easily and readily achieved than enterprise wide solutions. The Accessible Employment Standards currently being developed may also impact and address employee accommodation.

4. **The availability of alternate formats should be by request and adjustments made when sensitive timelines are involved.**
Provision of communications in multiple formats concurrently may be cost prohibitive and difficult to achieve. Nevertheless, some timeframes are prescribed by legislation (e.g. timelines to appeal a Council decision to the Ontario Municipal Board). Ensuring that opportunities are equal for persons with disabilities may require changes to other legislation.

5. **Ensure provincial supports to be provided are in place and ready when Standards are enacted as opposed to after the implementation process has begun.**

Experience with the existing *Accessible Customer Service Standards* has been that the promised supports (e.g. compliance manual, templates, etc.) were not provided until more than one year after the Regulation adopting the Standards was passed. A similar delay with these Standards will restrict our ability to meet time requirements.

6. **There needs to be synergy between all of the accessible standards being developed to:**
   a) avoid duplication of development requirements and costs, and
   b) provide municipalities with a better understanding of the cumulative costs of the five sets of standards and allow a more sound platform from which an effective implementation strategy could be developed.

Each set of standards are being developed by separate Provincial Standards Development Committees (SDCs) appear to be operating in isolation of each other. It is understood that all of the standards will have policy development requirements, training requirements, communication and feedback requirements, etc. Communication between SDCs, closer timing of the release of standards and comparison of requirements common between the standards would allow municipalities to avoid duplication of effort in implementing requirements common to all standards.

7. **Provincial funding to assist with implementation of all standards is imperative.**

According to preliminary information released with the proposed Standards, the potential cost of implementing these Standards is between 1% and 3% of a municipal operating budget. For Brampton, this amounts to between $3 million and $11 million. The Province has been clear that it does not intend to provide any funding assistance. This amounts to a further service imposition on municipalities by the Province with no financial supports, and costs to be borne by the property tax base.
Interdepartmental Comments:

Interdepartmental comments address the summary issues/comments noted above and are attached as Appendix B.

Conclusion

The City of Brampton has taken and continues to take a very progressive approach to addressing barriers to accessibility, including development and implementation of:

- Barrier Free Policy,
- Accessible Technical Standards,
- Alternate Formats Standard Operating Procedure, and
- Accessible Meetings Standard Operating Procedure.

Such measures, as well as pursuit of compliance with the Accessible Customer Service Standards demonstrate that the City is moving towards compliance with other standards, including the Information and Communication Standards. Staff will continue to monitor and participate in the development of new standards and keep Council apprised of such development and the opportunity to comment on proposed standards.

Original Signed By

Wendy Goss, Accessibility Coordinator
Council and Administrative Services

Concur

Original Signed By

Wendi Hunter, Manager of
Administrative Services & Elections
Council and Administrative Services

Original Signed By

Peter Fay, City Clerk/Director
Council and Administrative Services

Original Signed By

Kathy Zammit, Commissioner
Corporate Services
Appendices

Appendix A - Proposed Accessible Information and Communication Standards
Pages 1 to 34

Appendix B - Interdepartmental Comments
Pages 1 to 4
Accessible Information and Communications Standards Development Committee ("the Committee")

The Committee’s Annotated Recommendations for an Initial Proposed Standard for Public Review

Introduction

It is the Committee’s vision that by 2025, information and methods of communication are designed and developed up-front to be accessible to people with disabilities. The Committee also recognizes that individual accommodation will always be necessary. This proposed standard is progress toward what organizations in Ontario will be doing by 2025 to ensure they are not excluding people with disabilities as they prepare information and communicate with employees, other organizations, service recipients and the general public.
1. Scope

For the purposes of this standard:

"information" refers to data, facts, knowledge and the subject matter that may exist in any format such as text, numbers, image or sound and that conveys meaning;

"communication" refers to the interactive process between two entities (people, systems) where information is provided, sent or received.

This standard establishes accessibility requirements for:

- Four broad categories of communication, defined as:
  
a) Prepared communication to someone (examples: store flyers advertising products and promotions; brochures, schedules, program and funding criteria),

b) Predictable communication from someone – (examples: filling out a questionnaire, survey or application; a multiple choice examination; filling an order form for goods),

c) Unprepared communication to someone – (examples: real-time facility evacuation instructions; diagnosis and treatment information),

d) Unpredictable communication from someone – (examples: requests for assistance; essay and report-writing).

- Information Technology (IT)-based information and communication systems,

- Business enterprise systems, and

- Individual accommodation.

1.1 Application of Standard

Except where otherwise noted, timelines for compliance with this standard are:

Class 1 – Private Sector or non-profit organizations with 1-19 employees, by December 31, 2013
Class 2 – Private Sector or non-profit organizations with at least 20 employees, by December 31, 2012

Class 3 - Public Sector organizations with 1 employee or more, by December 31, 2011

2.0 Organizational Requirements

2.1 General Accessibility Requirements

When organizations provide individual accommodation as required by Ontario’s Human Rights Code, the organization shall meet the requirements of Section 5 and Schedule 1 and:

a) give the individual at least the same time to review, respond or use the information and communications for the intended purpose as given to others,

b) provide the same quality so that it is equally up-to-date, complete, and accurate as is available to others, and

c) provide the same availability in terms of time and place as is available to others.

2.2 Organizational Policies, Practices and Procedures

2.2.1 All organizations shall develop, implement, and maintain policies, practices and procedures to ensure compliance with requirements of this standard.

Application of 2.2.1

This requirement applies to organizations in all classes. However, Class 2 and Class 3 organizations shall document the policies, practices and procedures and make these available to persons with disabilities upon request in a manner consistent with Section 5 and Schedule 1 requirements.

2.2.2 Organizations shall develop a policy and establish a practice and procedure:

a) on making information and communications available in plain language; and

b) for the provision of communication assistance upon request.

Application of 2.2.2
This requirement applies to all Class 1 providers of critical services.* However, Class 2 and Class 3 organizations shall document the policy, practice and procedure and make these available to persons with disabilities upon request, in a manner consistent with Section 5 and Schedule 1 requirements.

2.3 Statement of Commitment

All organizations shall develop and maintain a statement of organizational commitment to accessible information and communications that is consistent with this standard and at minimum addresses the following elements:

a) training employees in accessible information and communications;
b) meeting the needs of persons with disabilities in a timely fashion that recognizes the urgency of the situation;
c) identifying, removing, and preventing barriers to the access of information and communications; and

d) providing information and communication services, resources, products, practices, and systems that are consistent with this standard.

Application of 2.3
This requirement applies to organizations in all classes. However, Class 2 and Class 3 organizations shall document the Statement and make it available to persons with disabilities upon request, in a manner consistent with Section 5 and Schedule 1 requirements.

2.4 User Request and Feedback Processes

All organizations shall establish processes for receiving and responding to user requests, feedback, and complaints regarding accessible information and communications. The processes shall:

a) be made available to employees, the general public and all users of information in a manner consistent with Section 5 and Schedule 1 of this standard; and,

b) permit persons with disabilities to identify their communication needs and to communicate in a manner consistent with Section 5 and Schedule 1 requirements.

Application of 2.4
This requirement applies to organizations in all classes. However, Class 2 and Class 3 organizations shall document the processes and provide information to
persons with disabilities upon request that the processes exist and what they cover, in a manner consistent with Section 5 and Schedule 1 requirements.

2.5 Cost for information and communications in alternate accessible formats
The cost to the person with a disability for alternate accessible formats as required by any sections of this standard shall be no more than the regular cost of the formats charged to others.

2.6 Duty to inform
Organizations shall inform persons with disabilities regarding the availability of accessible information and communications.

Application of 2.6
This requirement applies to organizations in all classes. However, Class 2 and Class 3 organizations shall do so in a manner consistent with Section 5 and Schedule 1 requirements of this standard.

2.7 Training
Organizations shall ensure training and guidance to employees, volunteers and others who are responsible for designing or providing and receiving information and communications on behalf of the organization that includes:

a) the organization’s policies, procedures and practices for providing accessible information and communications for persons with disabilities;
b) information and communication barriers to and needs of persons with disabilities;
c) the organization’s resources and tools for providing accessible information and communications; and
d) how to provide information to and communicate with persons with disabilities in emergency and crisis situations.

Application of 2.7
This requirement applies to organizations in all classes. However, Class 2 and Class 3 organizations shall document the training program and provide information to persons with disabilities upon request that the training program exists and what it covers, in a manner consistent with Section 5 and Schedule 1 requirements.
2.8 Emergency and Public Safety information

2.8.1 For the Public

Organizations shall provide their emergency and public safety information where this information is required under existing law, in a manner consistent with Section 5 and Schedule 1 requirements, as follows:

a) evacuation procedures and information about facility alarms for all buildings to which public access is allowed; and
b) information concerning plans for incidents that threaten life, property, operations, or the environment.

2.8.2 For Employees

Organizations shall provide the following emergency and public safety information to employees with disabilities, in a manner consistent with Section 5 and Schedule 1 except for Clause 5.2.a), but not limited to:

a) information relating to work place evacuation procedures and information about facility alarms;
b) workplace health and safety procedures and systems;
c) workplace hazardous materials information system; and
d) information concerning plans for incidents that threaten life, property, operations or the environment.

Application of 2.8.1 and 2.8.2

These requirements apply to all classes of organizations and all organizations shall comply with these requirements within 3 months of the standard coming into force. However, Class 2 and Class 3 organizations shall document the information for complying with Section 2.8 and inform persons with disabilities upon request that the information exists and what it covers, in a manner consistent with Section 5 and Schedule 1 requirements.

3.0 IT-based Information and communication systems

Information and communication systems refer to systems used to deliver or receive information or communications through a computer. This includes but is not limited to Web sites, software applications, and computer-based telecommunication systems.

3.1 New IT-based information and communication systems
New IT-based information and communication systems shall have an accessible user interface and content file format by default when made available for use by employees or the public in accordance with the timelines in section 1.1.

3.2 New content delivered through existing IT-based information and communication systems
New content delivered through existing IT-based information and communication systems shall be available in an accessible digital file format in accordance with the timelines in section 1.1.

3.3 User interfaces of existing IT-based information and communication systems
The software user interfaces of existing (IT-based) information and communication systems shall be accessible in accordance with the timelines in section 1.1.

Application of 3.1, 3.2, and 3.3
This requirement applies to all Class 1 providers of critical services and Class 2 and Class 3 organizations.

4.0 Business Enterprise Systems

Business enterprise systems refer to large and complex information technology applications capable of supporting fundamental (internal and/or external) business processes which are critical to the continued operation and growth of the organization.

4.1 Newly acquired business enterprise systems
Once the standard is in force, newly acquired business enterprise systems shall be compliant with Section 5 and Schedule 1 except for Clause 5.2.a) when made available for use by employees or the public.

4.2 Not yet deployed or implemented business enterprise systems
Once the standard is in force, organizations with business enterprise systems (with a contractual or financial commitment already in place) but not yet made available to employees or the public shall meet the requirements of Section 5 and Schedule 1 except for Clause 5.2.a) within 3 years of this standard coming into effect. Organizations shall ensure that user interfaces and data formats shall be compliant at the time they are made available for use by employees or the public.
4.3 Deployed or implemented business enterprise systems
Once the standard is in force, organizations with business enterprise systems already made available to employees or the public shall meet the requirements of Section 5 and Schedule 1 except for Clause 5.2.a) at the time of system update and no later than within 6 years of this standard coming into effect. User interfaces and data formats shall be compliant by 2012.

Application of 4.1.4.2. and 4.3
This requirement applies to all classes of organizations.

5.0 Accessible formats and methods

5.1 Application
The following requirements apply to all Class 1 providers of critical services and Class 2 and Class 3 organizations.

5.2 Provision of information and communication formats and methods
Organizations shall have the capacity to provide information and communications:

a) upon request from a person with a disability;
b) in a format that takes into account the person’s disability;
c) in a format or method appropriate for the type of communication (prepared, predictable, unprepared or unpredictable) (Clauses 5.3 to 5.6); and
d) in accordance with technical requirements contained in Schedule 1.

Organizations shall provide information and communication formats and methods to persons with disabilities:

a) to give the individual at least the same time to review, respond or use the information and communications for the intended purpose as given to others,
b) providing the same quality in that it is equally up-to-date, complete, and accurate as is available to others, and
c) providing the same availability in terms of time and place as is available to others.

5.3 Prepared Communication to a person with a disability
5.3.1 Print information
Organizations shall, in accordance with Clause 5.2, provide the following when prepared information and communication is provided in a print format:

a) an accessible electronic format (e-text) of the document,
b) a Braille-ready electronic format or Braille printout of the document,
c) an accessible audio format of the document,
d) an enlarged (large print) version of the printed information,
e) an electronic version of the document with supports for comprehension

5.3.2 Static Web Page
Organizations shall, in accordance with Clause 5.2, provide an accessible static web page when prepared information and communication is provided through a static web page.

5.3.3 Dynamic Web Site
Organizations shall, in accordance with Clause 5.2, provide an accessible dynamic web site when prepared information and communication is provided through a dynamic web site.

5.3.4 Spoken or audio recording
Organizations shall, in accordance with Clause 5.2, provide the following when prepared information and communication is provided through a spoken or audio recording:

a) a structured text transcription or caption of the speech and audio; and
b) the ability to amplify, pause and repeat audio.

5.3.5 Video recording
Organizations shall, in accordance with Clause 5.2, provide the following when prepared information and communication is provided through a video recording:

a) synchronized captioning of the video,
b) synchronized audio description of the video,
c) text transcript of the visual and audio information communicated by the video, and
d) synchronized interpretation of the speech and audio in sign language.

5.3.6 Electronic text file
Organizations shall, in accordance with Clause 5.2, provide the following when prepared information and communication is provided through an electronic text file:

a) accessible electronic text,
b) a Braille-ready electronic format,
c) a spoken format, and
d) a version in which the font size, font style, contrast, spacing and method of highlighting can be modified to meet individual user needs.

5.3.7 Software Application
Organizations shall, in accordance with Clause 5.2, provide an accessible software application when prepared information and communication is provided through a software application.

5.4 Predictable Communication from a person with disability

5.4.1 Speech (including but not limited to interactive voice relay)
Organizations shall, in accordance with Clause 5.2, provide the following functions when communication is provided in a form that is expecting a set of choices to be made through speech:

a) the ability to communicate or respond using an accessible dynamic web site,
b) the ability to receive live human assistance (e.g., to zero out for an operator),
c) the ability to extend the time given to respond or eliminate “time out” completely,
d) the ability to cancel or undo the last selection using an alternative to speech,
e) the ability to respond in writing or text, and
f) the ability to use the keypad instead of IVR system (interactive voice response).

5.4.2 Typing and/or pointing device
Organizations shall, in accordance with Clause 5.2, provide the following functions when communication is provided in a form that is expecting a set of choices to be made through typing and/or a pointing device:

a) the ability to use personal assistive technology including alternative keyboards, augmentative and alternative communication devices and software based on-screen keyboards or the provision of equivalent assistive technology that can be configured by the user,
b) the ability to use alternative pointing devices,
c) the ability to use stabilizers and key guards,
d) the ability to use configurable keyboard access utilities including key
 activation delay, repeat delay and/or a single finger utility,
e) the ability to use a word completion or word prediction utility,
f) sufficient time to respond,
g) the ability to cancel or undo the last selection, and
h) the ability to respond using speech or voice recognition.

5.4.3 Personal signature
Organizations shall, in accordance with Clause 5.2, provide an opportunity to use
a legal alternative to a personal signature when a personal signature is required.

5.4.4 Handwriting (including but not limited to forms and applications)
Organizations shall, in accordance with Clause 5.2, provide the following when
communication is provided in a form that is expecting a set of choices to be
made through handwriting:

a) accessible electronic alternative to forms or applications,
b) guides and stabilizers to assist in completing forms,
c) transcription of speech or speech recognition, and
d) sufficient time to respond.

5.4.5 Mechanical controls
Organizations shall, in accordance with Clause 5.2, provide the following when
communication is provided in a form that is expecting a set of choices to be
made using mechanical controls:

a) enlarged buttons or controls with increased spacing,
b) guides, stabilizers and tactile labels to assist in activating buttons and controls,
c) human assistance in activating mechanical controls, and
d) direct access to all functions using a personally optimized
 assistive technology or personal mobile device. (Note: the requirement is
 for organization to accept input from the device).

5.4.6 Touch controls
Organizations shall, in accordance with Clause 5.2, provide the following when
communication is provided in a form that is expecting a (constrained) set of
choices to be made using touch control:

a) enlarged controls with increased spacing,
Appendix A – Proposed Accessible Information and Communication Standards

b) direct access to all functions using a personally optimized assistive technology or personal mobile device (Note: the requirement is for organizations to accept input from the device),
c) voice input,
d) mechanical keypad input alternative,
e) audio interface accessible to individuals who cannot see controls.

5.4.7 Biometrics
Organizations shall, in accordance with Clause 5.2, provide an alternative to biometric identification when communication is required in a form that requires biometric identification.

5.5 Unprepared communication to a person with a disability

5.5.1 Spoken message in person
Organizations shall, in accordance with Clause 5.2, ensure the following when unprepared information and communication is provided through a spoken message in person:

a) access to the use of an assistive listening system (e.g., connection to a Frequency Modulated (FM) System),
b) real-time captioning or written transcription of information through remote relay or in person,
c) communication assistance for a person using alternative and augmentative communication methods and strategies.

5.5.2 Spoken message over a phone, other mobile device or computer
Organizations shall, in accordance with Clause 5.2, provide the following when unprepared information and communication is provided through a spoken message over a phone, other mobile device or a computer:

a) live text message as alternative or addition to spoken message,
b) information repeated, clarified or restated upon request.

5.5.3 Live text message
Organizations shall, in accordance with Clause 5.2, provide the following when unprepared information and communication is provided through a live text message:

a) spoken version of text message,
b) information repeated, clarified or restated upon request.
Appendix A – Proposed Accessible Information and Communication Standards

5.5.4 Live video conference
 Organizations shall, in accordance with Clause 5.2, provide the following when unprepared information and communication is provided through a live videoconference:

a) spoken description of gestures and drawing,
b) information repeated, clarified or restated upon request,
c) real-time captioning or written transcription of spoken information through remote relay or in person.

5.6 Unpredictable communication from a person with a disability

5.6.1 Speech
 Organizations shall, in accordance with Clause 5.2, provide the following when communication is provided in a form that is expecting the individual to communicate or respond using unconstrained speech:

a) sufficient time to construct messages,
b) communication assistance for a person who has limited or no speech and/or using alternative and augmentative communication methods and strategies,
c) ability to communicate or respond through text or writing.

5.6.2 Typing and/or pointing device (e.g., mouse)
 Organizations shall, in accordance with Clause 5.2, provide the following when communication is provided in a form that is expecting the individual to communicate or respond using typing and/or a pointing device:

a) ability to use speech and/or voice recognition,
b) ability to use a personal alternative input device,
c) ability to use keyboard modifications and/or pointing device alternatives, and
d) provision of sufficient time to construct messages.

5.6.3 Handwriting (not including signature for authentication or authorization)
 Organizations shall, in accordance with Clause 5.2, provide the following when communication is provided in a form that is expecting the individual to communicate or respond using handwriting:

a) ability to use an accessible electronic form,
b) additional time to construct messages,
c) ability to use speech and/or voice recognition, and

5.7 Sign language interpretation, intervention, note taking and real-time captioning services and personal communication assistant

5.7.1 For pre-arranged appointments that have significant personal impact for an individual, organizations shall negotiate arrangements for obtaining communication supports and shall provide access to sign language interpretation, intervention, note taking and real-time captioning services and personal communication assistant if requested by a person with a disability for access to information provided through:

a) printed material,
b) written communications,
c) prepared spoken or audio information,
d) prepared video information,
e) electronic file,
f) unprepared message spoken in person,
g) unprepared message spoken over a phone or other mobile device,
h) live video conference, and
i) when expecting speech.

5.7.2 All organizations shall accept communications through sign language interpretation, intervention, note taking and real-time captioning services and personal communication assistant.

6.0 Requirements for Educational Organizations and Regulatory Bodies

Educational organizations means those organizations that have as a primary focus the provision of training or education, including but not limited to elementary, secondary, and post-secondary public, private, and not-for-profit organizations.

6.1 Text-based educational materials

6.1.1 Providers of training or education

Organizations that provide training or education shall order an accessible electronic format for all text-based materials purchased for the purpose of education/training. The material shall be delivered by the publishers of the material to the organizations in an accessible alternative format before or at the same time as the text-based materials, at no extra charge, in a manner consistent with Section 5 and Schedule 1.
6.1.2 Educators
Organizations engaged in the provision of training or education shall ensure that its educators provide accessible educational/training materials to recipients with disabilities before or at the same time as other recipients, in a manner consistent with Section 5 and Schedule 1.

6.1.3 Educational libraries
Educational libraries affiliated with organizations that provide training or education shall acquire an accessible electronic format for all new educational/training/reference text-based materials in a manner consistent with Section 5 and Schedule 1. Acquisition exemptions include archival materials including special collections, rare books, and donations.

Once the standard is in force, existing library materials shall be made available in accessible formats upon request.

6.2 Multi-media educational material (non-text based)

6.2.1 Providers of training or education
Organizations that provide training or education shall order an accessible electronic format for all multi-media material purchased for the purpose of education/training. The material shall be delivered by the publishers of the material to the organizations in an accessible alternative format before or at the same time as the multi-media material, at no extra charge, in a manner consistent with Section 5 and Schedule 1.

6.2.2 Educators
Organizations engaged in the provision of training or education shall ensure that its educators provide accessible educational/training multi-media materials or appropriate substitutes to recipients with disabilities before or at the same time as other recipients, in a manner consistent with Section 5 and Schedule 1.

6.2.3 Educational libraries
Educational libraries affiliated with organizations engaged in the provision of training or education shall acquire an accessible electronic format for all new educational/training/reference multi-media materials in a manner consistent with Section 5 and Schedule 1. Acquisition exemptions include archival materials, including special collections, rare materials, and donations.
Once the standard is in force, existing library materials shall be made available in accessible formats upon request.

6.3 Professional, Regulatory and Licensing Bodies

All organizations identified in Schedule 4 of this standard shall ensure that licensing or regulatory requirements for entry into practice and mandatory professional development include training in:

a) determining information and communication barriers and requirements of persons with disabilities;

b) accessible information and communication resources and tools; and

c) adaptation of information and communications to meet the accessibility needs of persons with disabilities.

6.4 Developers of information and communication resources

Organizations, public, private and not for profit, that provide training or education on the design, production, and/or delivery of information and communication products (such as software applications, web applications and sites, computer hardware, marketing and public relations content etc.) shall provide training to recipients in:

a) information and communication barriers and requirements of persons with disabilities;

b) inclusive design principles, resources, and tools, and

c) testing of information and communication products to ensure they meet the accessibility needs of persons with disabilities

7.0 Accessible Municipal and Provincial Elections

7.1 Voting

Secure voting methods (such as online and / or telephone) shall be implemented to allow persons with disabilities to vote privately and independently.

7.2 Municipal Candidates in Municipal Elections and Political Parties in Provincial Elections

Municipal candidates in municipal elections and provincial parties in provincial elections shall provide their election and candidate material in a manner consistent with Section 5 and Schedule 1.
7.3 Candidates Meetings
Political parties in provincial elections shall hold at least one meeting in a manner consistent with Section 5 and Schedule 1.

Persons with disabilities shall be provided with the ability to:
a) participate in the discussion during the meeting; and
b) pose questions to candidates and receive answers to questions

8.0 Definitions

Accessible digital format - an electronic means of transmitting information and is accessible when that format presents textual, audio and graphic information in a manner that allows the user to find their way and enables comprehension, anticipation and understanding of the data flow and organization of the material.

American Sign Language (ASL) - ASL is a visual language with its own vocabulary, grammar, syntax and social rules of use, distinct from English, used by Deaf people primarily in Canada and the United States. ASL is not English represented visually on the hands. Meaning is conveyed through signs that are composed of specific hand shapes, palm orientation, movement and location of the hands, and signals on the face and body (eye gaze, eyebrows, mouth movements, head and shoulder shifts and body movement). In Canada, there are two main sign languages: American Sign Language (ASL) and Langue des signes québécoise (LSQ).

Langue des signes québécoise (LSQ) - LSQ is a visual language with its own vocabulary, grammar, syntax and social rules of use, distinct from French, used by Deaf people in Canada. LSQ is not French represented visually on the hands. Meaning is conveyed through signs that are composed of specific hand shapes, palm orientation, movement and location of the hands, and signals on the face and body (eye gaze, eyebrows, mouth movements, head and shoulder shifts and body movement). In Canada, and true for Ontario, there are two main sign languages: American Sign Language (ASL) and Langue des signes québécoise (LSQ).

Assistive technology (or adaptive technology) – equipment or software that assists people with disabilities; examples include screen readers and voice input software.
Assistive listening system (ALD)- any type of system that includes devices that can help an individual access spoken information in communication situations. An ALD can be used with or without hearing aids to overcome the negative effects of distance, background noise, or poor room acoustics (e.g., an FM System).

Augmentative and alternative communication (AAC) methods and strategies - includes speech generating devices, communication software, paper communication displays and books with letters or symbols, pictures, sign language and gestures, and body language.

Audio (auditory) description – either a prerecorded human voice or a synthesized voice (recorded or generated dynamically) describing the key visual elements of a movie or other animation; the audio description is synchronized with (and possibly included as part of) the audio track of the presentation, usually during natural pauses in the audio track; audio descriptions include information about actions, body language, graphics, and scene changes.

Business enterprise systems - refer to large and complex information technology applications capable of supporting fundamental (internal and / or external) business processes which are critical to the continued operation and growth of the organization.

Captioning (open or closed) – the process of converting narration, dialogue, music, or sound effects of a video production into text that is displayed on a screen.

Communication - refers to the interactive process between two entities (people, systems) where information is provided, sent or received.

Complete – all critical information and data present when accessed by assistive technology or converted into another form or media.

Dynamic (or interactive) website – a website that reacts to user choices and information entered by a user or information in a database.

Inclusive Design - a design process that results in systems, services or products that can be used by everyone regardless of disability. In information and communication systems access can be optimized for each individual user by adjusting the configuration according to the individual using the system through IT enabled personalization. Inclusive design adheres to the 7 principles of
universal design through a flexible system or resource:
1. Equitable use
2. Flexibility in use
3. Simple and intuitive
4. Perceptible information
5. Tolerance for error
6. Low physical effort
7. Flexible method of control

Information - refers to data, facts, knowledge and the subject matter that may exist in any format such as text, numbers, image or sound and that conveys meaning.

Intervener – an individual who provides a professional service to facilitate the interaction of a person who is deaf-blind with other people and the environment; the intervener's role may include providing access to environmental information (auditory, visual, and tactile) by means of a variety of communication methods and acting as a sighted guide or interpreting on behalf of a person who is deaf blind; these services are provided in the deaf-blind person's preferred method of communication which can include tactile signing systems, Braille, large print, communication boards, or any other method required.

IT-based information and communication system – a system used to deliver or receive information or communications through a computer. This includes but is not limited to Web sites, software applications, and computer-based telecommunication systems.

Mobile digital media - digital content in a form that can be transferred from one system to another and which can include memory sticks, DVDs, flash memory cards; the formats evolve and change.

Multimedia (non-text based) materials used for learning - comprehensive learning resources that are in a variety of media that are not primarily text-based such as video representations, graphic images, three dimensional models or manipulatives.

Personal communication assistant - a person chosen and directed by the person who has a communication disability to assist him/her when communicating with another person in face to face, written or telephone contexts; a personal communication assistant shall know how the individual communicates and uses specific, individualized strategies to ensure accuracy, full comprehension, authorship and completeness of the person’s intended message.
to another person; communication assistants may be informal (e.g. family members, friends) or they may be trained communication assistants that are required in specific situations (e.g. legal, court, health or counselling services etc.).

**Plain language** – a way of writing and presenting information and complex messages so that it is easy to read, understand and use; some characteristics of plain language may include writing to a simpler reading level, eliminating jargon and unnecessary words, using familiar words in a conversational style, and the use of uncomplicated sentence structure and grammar.

**Predictable communication** - communication from someone in which the possible responses are limited and predictable. (e.g., multiple choice).

**Prepared communication** - communication that is prepared before it is delivered; this communication or information is predictable and planned.

**Real-time captioning** - method of captioning in which captions are simultaneously prepared and transmitted at the time of origination; an example of this is Communication Access Real-time Translation (CART) which is the instant translation of the spoken word into English text using a stenotype machine, notebook computer and real-time software.

**Sign language interpreter** – a person who provides interpretation including American Sign Language (ASL) or Langue des signes Québécoise (LSQ) between deaf or deafened and hearing individuals or groups.

**Streaming audio** - audio that is transmitted over the internet and can be synchronously or asynchronously played through an audio player.

**Static webpages** – webpages that do not enable interactivity and having content that does not change dynamically.

**Structured text** - text that contains mark-up to denote structural elements such as paragraphs, headers, sub-headers, sections, pages and highlighted elements.

**Text-based materials used for learning** - comprehensive learning resources that are in print or electronic form, or that consist of any combination of print and electronic format.

**Unpredictable communication** - communication from someone in which the possible responses are not limited, free form or unconstrained.
Appendix A – Proposed Accessible Information and Communication Standards

**Unprepared communication** - communication that is unpredictable, unplanned and live or in real time; the information is not prepared before it is delivered.

**User Interface** – the means by which the user interacts with an electronic application (computer systems and software); this includes the method of presenting information to the user and the method whereby the user controls the functionality of the electronic application.

**W3C WCAG** - Web Content Accessibility Guidelines 2.0 (WCAG 2.0) covers a wide range of recommendations for making Web content more accessible. Following these guidelines will make content accessible to a wider range of people with disabilities, including blindness and low vision, deafness and hearing loss, learning disabilities, cognitive limitations, limited movement, speech difficulties, photosensitivity and combinations of these. Following these guidelines will also often make Web content more usable to users in general.

**Schedules and Appendices**

**Schedule 1 - Information and Communications Technical Requirements**

**1.0 Accessible Web Pages / Websites**

**1.1 Static Web Pages**
Web pages that are not dynamically generated and have no mechanisms for input or feedback from users shall:

a) be created using an *authoring tool* that conforms to the W3C Authoring Tool Accessibility Guidelines 2.0 with accessibility features activated, or

b) be tested and pass a *Web page evaluation and repair tool* that meet the criteria specified by the W3C Web Accessibility Initiative, or

c) fully meet W3C Web Content Accessibility Guidelines 2.0, level AA.

**1.2 Dynamic or Interactive Web Sites**
Web sites that are dynamically generated and/or have mechanisms for input or feedback from users shall:
Appendix A – Proposed Accessible Information and Communication Standards

a) be created using an **authoring tool** that conforms to the W3C Authoring Tool Accessibility Guidelines 2.0 with accessibility features activated, and
b) implement a **library of components** that conforms to Accessibility for Rich Internet Applications and the W3C Web Content Accessibility Guidelines 2.0, or
c) fully meet W3C Web Content Accessibility Guidelines 2.0 priority 2 or AA and implement semantic mark-up conforming to Accessibility for Rich Internet Applications

Web sites requiring log-in or implementing a single sign-on system shall:

a) programmatically accept and respond to personal needs and preferences expressed using a ISO 24751 based portable needs and preference statement (including externally linked or referenced statements), or
b) provide a preference wizard with at least an equivalent set of choices relevant to the application.

### 2.0 Accessible Form (Electronic)

Electronic forms shall:

a) be fully operable using a keyboard.
b) associate labels with form fields through both visual and non-visual programmatic means.
c) provide a logical order for navigating through the form.
d) enable reconfiguration of font size, font style (serif versus san serif), colour and contrast
e) be operable using assistive technology.

### 3.0 Accessible E-Text

Information provided as an accessible electronic file shall:

a) be operable using current screen readers and text-to-speech applications,
b) be searchable,
c) use either ANSI/NISO Z39.86-2005 (also referred to as Digital Accessible Information System) as an intermediate format or an open standard that includes the structural elements of ANSI/NISO Z39.86-2005 (this includes well structured HTML, XHTML, DHTML, PDF, ODF, OOXML, or Word),
d) provide a description of specific information conveyed by non-text content in the context of the document, and
e) be provided in a media that is readily accessible on-line, or in a media available on the majority of devices reading electronic files.
4.0 Supports for Comprehension for information in electronic form
Supports for comprehension when the information is in electronic form shall:

a) provide a method of speaking text at the same time as it is highlighted with the ability to pause and repeat, or be compatible with assistive technology which performs this function,
b) provide a link to an electronic dictionary
c) provide a glossary for metaphorical language or idioms and acronyms,
d) provide the ability to view the information in a logical sequence (one section at time) or at the same time,
e) use a format that makes structure obvious, and
f) provide navigational supports that help the user to get back to a starting point if lost and to undo moves.

5.0 Captioning
All video whether delivered over the Web, via moveable digital media, on a mobile device, through film, through a kiosk or other delivery device shall provide the option of captioning. The captioning shall be:

a) equivalent and equal in content to that of the audio, including speaker identification, verbatim transcript of speech and description of sound effects; and
b) synchronized with the audio content of the video.

6.0 Description
All video whether delivered over the Web, via moveable digital media, on a mobile device, through film, through a kiosk or other delivery device shall provide the option of description (also referred to as descriptive video). The description shall:

a) describe visual information essential or important to understanding the content of the video (including the menu); and
b) be synchronized with the visual information while not interfering with the spoken audio content of the video.

7.0 Accessible Software and User Interface
All software applications and user interfaces shall:
Appendix A – Proposed Accessible Information and Communication Standards

8.0 Braille Ready Electronic Format

For files provided in Braille ready format:

a) shall be converted into a common Braille ready format using Braille conversion software such that it can be printed on a Braille embosser or read using a Refreshable Braille display without further conversion;
b) all math and science notation shall adhere to the Nemeth Braille Code for Mathematics and Science Notation, 1972 rev.

9.0 American Sign Language (ASL) or Langue des signes Québécoise (LSQ) interpretation

Persons and organizations shall use ASL/LSQ interpreting service providers who meet the following criteria:

a) are graduates of a recognized postsecondary training program; OR,
b) are members of a professional association of sign language interpreters; OR
c) have passed a recognized sign language interpreter screening process; OR
d) are determined by another method to have the necessary competencies to provide quality interpreting services.

10.0 Alternative to Biometric identification

When a product uses a biometric form of user identification that relies on a person possessing one unique biological characteristic that some people may not have, an alternative method of identification (biometric or non-biometric) shall also be provided.
11.0 Alternative to Personal Signature

When a personal handwritten signature is required, individuals who are unable to produce a verifiably consistent and identifiable handwritten signature shall be given the option of an alternative method of verifying or consenting that:

a) the individual is fully informed about what they are signing; and
b) the "signature" is the unique mark of the individual referenced in the document, or
c) the individual is present and informed when a proxy signature is provided, or
d) the "signature" is a digital signature compliant with the *Personal Information Protection and Electronic Documents Act* (PIPEDA) secure electronic signature requirements.

12.0 Direct access using a personally optimized assistive technology or personal mobile device

This requires the provision of an IRDA (Infrared Data Association) compatible infrared port (or equivalent industry standard) that allows activation of all features remotely through assistive technology or a personal mobile device.

The technical information needed to setup the personal device to control the kiosk or electronically delivered service shall be made available.

13.0 Real-time captioning

Persons and organizations shall use real-time captioning service providers who are determined to have the necessary competencies to provide quality real-time captioning services.
Schedule 2: Boards, Commissions, Authorities and Agencies

(Class 3 organizations from Customer Service regulation)

1. Agriculture, Food and Rural Affairs Appeal Tribunal.
2. Agricorp.
3. Alcohol and Gaming Commission of Ontario.
4. Algonquin Forestry Authority.
5. Assessment Review Board.
6. Board of negotiation continued under subsection 2.97 (1) of the Expropriations Act.
7. Cancer Care Ontario.
8. The Centennial Centre of Science and Technology.
12. Consent and Capacity Board.
15. Crown Employees Grievance Settlement Board.
18. Echo: Improving Women's Health in Ontario.
19. Education Quality and Accountability Office.
22. Financial Services Tribunal.
25. Greater Toronto Transit Authority.
26. Greater Toronto Transportation Authority.
27. Health Professions Appeal and Review Board.
29. Health Services Appeal and Review Board.
31. Landlord and Tenant Board.
32. Legal Aid Ontario.
33. Licence Appeal Tribunal.
34. Liquor Control Board of Ontario.
35. Each local health integration network as defined under Section 2.9 of the *Local Health System Integration Act, 2006*. 
36. McMichael Canadian Art Collection.
37. Metropolitan Toronto Convention Centre Corporation.
38. Niagara Escarpment Commission.
40. Normal Farm Practices Protection Board.
41. Office of the Employer Adviser.
42. Office of the Worker Adviser.
43. Ontario Civilian Commission on Police Services.
44. Ontario Clean Water Agency.
45. Ontario Educational Communications Authority.
46. Ontario Electricity Financial Corporation.
47. Ontario Energy Board.
48. Ontario Farm Products Marketing Commission.
49. Ontario Film Review Board.
50. Ontario Financing Authority.
51. Ontario Food Terminal Board.
52. Ontario French-language Educational Communications Authority.
53. Ontario Health Quality Council.
54. Ontario Heritage Trust.
55. Ontario Highway Transportation Board.
57. Ontario Infrastructure Project Corporation.
58. Ontario Labour Relations Board.
59. Ontario Lottery and Gaming Corporation.
60. Ontario Media Development Corporation.
61. Ontario Mental Health Foundation.
62. Ontario Municipal Board.
63. Ontario Northland Transportation Commission.
64. Ontario Parole and Earned Release Board.
65. Ontario Pension Board.
66. Ontario Place Corporation.
68. Ontario Racing Commission.
69. Ontario Realty Corporation.
70. Ontario Review Board.
71. Ontario Securities Commission.
72. Ontario Special Education Tribunal (English).
73. Ontario Special Education Tribunal (French).
74. Ontario Tourism Marketing Partnership Corporation.
75. Ontario Trillium Foundation.
76. Ottawa Congress Centre.
77. Owen Sound Transportation Company.
78. Pay Equity Hearings Tribunal.
79. Pay Equity Office.
80. Province of Ontario Council for the Arts.
81. Public Service Grievance Board.
82. Royal Ontario Museum.
83. St. Lawrence Parks Commission.
84. Science North.
85. Smart Systems for Health Agency.
86. Social Assistance Review Board.
87. Social Benefits Tribunal.
88. Soldiers' Aid Commission.
89. Trillium Gift of Life Network.
90. Walkerton Clean Water Centre.
91. Workplace Safety and Insurance Appeals Tribunal.
92. Workplace Safety and Insurance Board.
Schedule 3: Broader Public Sector

(Class 3 organizations from Customer Service regulation)

1. Every district school board as defined in section 1 of the Education Act.
2. Every hospital as defined in section 1 of the Public Hospitals Act.
3. Every college of applied arts and technology established under the Ontario Colleges of Applied Arts and Technology Act, 2002.
4. Every university in Ontario, including its affiliated and federated colleges, that receives operating grants from the Government of Ontario.
5. Every public transportation organization in Ontario, including any municipally operated transportation services for persons with disabilities, that provides services for which a fare is charged for transporting the public by vehicles that are operated,
   i. by, for or on behalf of the Government of Ontario, a municipality, a local board of a municipality or a transit or transportation commission or authority,
   ii. under an agreement between the Government of Ontario and a person, firm, corporation, or transit or transportation commission or authority, or
   iii. under an agreement between a municipality and a person, firm, corporation or transit or transportation commission or authority.
Appendix A – Proposed Accessible Information and Communication Standards

Schedule 4: Licensing and regulatory bodies (list under development)

1. Board of Funeral Services
2. Collection Agency Licensing
3. College of Audiologists and Speech-Language Pathologists of Ontario
4. College of Chiropodists of Ontario
5. College of Chiropractors of Ontario
6. College of Dental Hygienists of Ontario
7. College of Denturists of Ontario
8. College of Dieticians of Ontario
9. College of Early Childhood Educators
10. College of Homeopaths of Ontario (in the process of being established)
11. College of Kinesiologists of Ontario (in the process of being established)
12. College of Massage Therapists of Ontario
13. College of Medical Laboratory Technologist of Ontario
14. College of Medical Radiation Technologists of Ontario
15. College of Midwives of Ontario
16. College of Naturopaths of Ontario (in the process of being established)
17. College of Nurses of Ontario
18. College of Occupational Therapists of Ontario
19. College of Opticians of Ontario
20. College of Optometrists of Ontario
21. College of Psychotherapists and Registered Mental Health Therapists of Ontario (in the process of being established)
22. College of Physicians and Surgeons of Ontario
23. College of Physiotherapists of Ontario
24. College of Psychologists of Ontario
25. College of Respiratory Therapists of Ontario
26. College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario
27. College of Veterinarians of Ontario
28. Institute of Chartered Accountants of Ontario
29. Law Society of Upper Canada
30. Ontario Association of Architects
31. Ontario College of Pharmacists
32. Ontario College of Social Workers and Social Service Workers
33. Ontario College of Teachers
34. Ontario Motor Vehicle Industry Council
35. Professional Engineers Ontario
36. Registered Insurance Brokers of Ontario
37. Royal College of Dental Surgeons of Ontario
38. Real Estate Council of Ontario
*College of Dental Technologists of Ontario has been left off the list as it has no contact with patients
** Additional requirements for Architects and Engineers could be covered under Built standard
Appendix 1

ACCESSIBLE INFORMATION AND COMMUNICATIONS STANDARDS
DEVELOPMENT COMMITTEE MEMBERS

VOTING MEMBERS

A. Disability Community Representatives
1. Sharlyn Ayotte (Ottawa) Individual
2. Susan Brunet (Ottawa) Individual
3. Darren Cooper (Toronto) Individual
4. Marcia Cummings, Alliance for Equality of Blind Canadians (Toronto)
5. Pina D'Intino (Toronto) Individual
6. Francine Drouin, Regroupement des Parents et Amis des Enfants Sourds et Malentendants Franco-Ontarien (RESO) (Clarence Creek)
7. Geoff Eden (Welland) Individual
8. Tara Jeji, Association of Physical Disabilities for Windsor/Essex (Windsor)
9. Kurt Lynn, Canadian Hard of Hearing Association (Toronto)
11. Sue Morgan, Independent Living Centre of Waterloo Region (Kitchener)
12. Fran Odette, Springtide Resources (Toronto)
13. Nicole Rioux, Table provinciale francophone pour la personne handicapée
15. Diane Wagner, Learning Disabilities Association of Ontario (Toronto)
16. Rozalyn Werner-Arce, Community Living Ontario (Toronto)

B. Representatives of Private/Not for Profit Organizations

Private Sector/Labour:
1. Anna Sheehan, TD Bank Financial Group
2. Doug Jure, Bloor-Yorkville BIA (Barrie/Toronto)
Appendix A – Proposed Accessible Information and Communication Standards

3. Robert Pearson, Sun Life Financial (Toronto)
4. Michelle Saunders, Ontario Restaurant Hotel and Motel Association (Mississauga)
5. Dan Shire, IBM Canada (Toronto)

Not-for-Profit:
6. George Elliott, the Anglican Diocese of Toronto & Provincial Synod of Ontario (King City)
7. Lari Langford, Ontario Library Association (Toronto)
8. Bill Munson, Information and Technology Association of Canada for Ontario (Mississauga)

C. Broader Public Sector and Municipal Representatives

Broader Public Sector:
9. Teresa Colangelo, Ontario Federation of Labour (Toronto)
10. Beth Cooper, Ontario Public School Boards Association (Windsor)
11. Don Halpert, Ontario Hospital Association (Thunder Bay)
12. Sherrill McCall, Cambrian College of Applied Arts and Technology (Garson)
13. Jeanette Parsons, Council of Ontario Universities (Kingston)

Municipal:
1. Elizabeth Daly, Association of Municipal Managers, Clerks and Treasurers of Ontario (AMTCO)
2. Patricia MacDonell, City of Toronto (Toronto)
3. Mary Reid, City of Ottawa / Association of Municipalities of Ontario (Ottawa)
ADVISORY MEMBERS

Ontario Ministry Advisors:
1. Marla Krakower, Ministry of Government and Consumer Services
2. Israel Lyon, Ministry of Economic Development and Trade/Small Business and Entrepreneurship
3. Eileen Mahood, Ministry of Health and Long-Term Care
4. Eydie Troper, Ministry of Training, Colleges and Universities

Disability Advisors:
1. Barbara Collier, Augmentative Communications Partnerships Canada (Toronto)
2. Neita Israelite, York University (Toronto)
3. Lynn Shaw, University of Western Ontario (London)
Appendix B – Interdepartmental Comments

Corporate Communications

- Some simple changes to written and designed communications materials can be made to ensure compliance some of the proposed Standards.

- There will be additional costs - who will budget and pay for these costs?

- Concern with alternative format material having to be produced and ready for the public at the same time as “traditional” material is produced and the budget implications for program areas.

- With respect to alternate formats, the Corporation needs to have the appropriate resources available (Sign Language Interpreters, Braille, closed captioning, etc.) to accommodate these requests.

- The ability to have alternative formats available at the same time as traditional format will have huge resource implications, both staff and budget, and time implications. Better approach would be to approach user groups and develop the appropriate alternative format beforehand to ensure that specific target audience is included and aware of initiative, rather than waiting for a specific request.

- With respect to supplying personal communication assistants, interveners and sign language interpreters, the City may require vendors on record. Implementation may be a challenge as there is a province-wide shortage of qualified sign language interpreters and this further complicates the logistics of having one available at any given time.

- A formal policy that addresses plain language and accessibility is a positive step. This is particularly important in Brampton which has such a large population who speak English as a second language. However, some Departments whose function is highly technical may find it difficult to use plain language.

- Support the development of a statement of commitment to accessible information.

- How will the need for a user request and feedback process be addressed?

- Important that critical health and safety information is communicated to all residents. Need to pull together Emergency Measures Office, Fire and Corporate Security to develop procedures to do this.

- Informing persons with disabilities that accessible information and communication is available could be accomplished with a standard statement on all documents advising that alternative formats are available.
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- There should be no extra cost to the public for documents in alternate formats; the challenge will be for program areas to budget for this.

- Agree in principle with ensuring that individuals with disabilities are not disadvantaged in terms of the timeliness, quality and availability of communication, given or received. Need more specific information regarding timelines and what is reasonable depending on format needed.

- Need to have Human Resources address training requirements.

- Need to ensure that I.T. can facilitate the timely uploading of accessible electronic versions of documents; however, with new content management system coming on board, it could be that departments might be doing this themselves without going through I.T.

- It appears the single largest contributor to the incremental cost relates to compliance measures associated with updating the municipality's business enterprise systems (i.e., costs associated with obtaining accessible software and hardware and the related incidental fees such as training and consulting services). KPMG has concluded that "the estimated cost of compliance" with the Committee's proposed Standard will range from 1-3% of annual operating costs. Applying this standard to Brampton's $380 million operating budget translates to an incremental cost of $3.8 million to $11 million.

Information Technology

- The proposed Standards' changes could have significant business and financial impacts as it relates to enterprise business systems. The City of Brampton has approximately 94 Corporate Applications and to ensure those applications are compliant would be a multi-year multi-million dollar initiative.

- It is recommended that the City's first step is to identify and prioritize the business requirements. In some cases alternative methods may be available rather than making system changes. The prioritization process would focus our efforts on public facing enterprise business systems first. The City of Brampton has predominantly purchased all their enterprise business systems and configured these systems to meet our specific business processes. As a result some of the proposed standard changes would require extensive time and effort to re-configure the applications and in some cases may require the vendor (developer) of the application to make these changes. In this situation, the timing and associated cost of the changes would be out of the City's control.

- Currently the City is in the process of planning and implementing a new corporate website which puts us in a much better position to accommodate some of the proposed Standards.
• The City also has numerous departmental applications that have been purchased and/or custom developed by the departments. These applications, especially the public facing ones, would also have to come under the scope and review of this initiative.

• The recommended and proposed way to approach this initiative is to assign a Project Manager that would document our current and proposed state so we can methodically and systematically take steps to ensure we meet the minimum standard requirements aligned with prioritized business requirements. At the same time the project manager would be able to assess alternative solutions in a manner that evaluates the cost/benefit of making these changes in enterprise business systems versus other business processes/technology/solutions/etc.

• The Standards need to provide opportunities and flexibility for the use of alternative solutions and address the timeliness and reasonableness for organizations to affect the changes as well as the turnaround time for service delivery

• Standards should include a provision for staff training to provide background information on the technical requirements being proposed.

• The Province should consult with software vendors and suppliers before establishing technical requirements ensuring compatibility with solutions already in the market place that are widely used by most municipalities. The Province should also get commitment from the software vendors to ensure the vendors adopt and align with the Standards proposed before they are legislated.

Accessibility Program

• Compliance timeframes are too short – consideration has not been given to the municipal budget and planning timeframes

• Consideration has not been given to the cumulative cost impact of all 5 sets of accessible standards

• Economic times do not support implementation as proposed

• Concern about availability of accessibility supports and services such as ASL interpreters and real time captioning

• Standard expectations do not necessarily reflect what is available in the market place today – for some applications, municipalities are restricted by what is offered and these may not comply with the Standards
• Requiring documents in alternate formats to be available at the same time – will require adjustments to timelines and appeal periods for some functions. This may require changes to provincial legislation.

• There is a disconnect between when municipalities and potential vendors/suppliers have to comply with Standards – private organizations do not have to comply until 2012 or 2013 depending on the number of employees they have.

• Provincial technical requirements for software programs and equipment may not be compatible or available from national or international suppliers.

• Municipalities simply administer elections and do not have control over each individual candidate’s campaign.

• Possible security and inequity concerns with electronic and telephone voting.

• The timing and implementation of accessibility Standards for provincial services that are carried out by municipalities i.e. marriage licenses and provincial systems like Bizpal.

• A corporate policy with associated SOP’s and practices could be developed using an approach similar to that in place for the Accessible Customer Service Standards.

• Support communications in plain language with understanding that some communications will involve more technical language based on the service provided.

• Current Alternate Format and Accessible Meetings SOP’s and Inclusive Customer Service policy support the requirement to provide documents and communications in formats that meet an individual’s needs. Support for these being made upon request.

• Feedback process as required and being developed under the Inclusive Customer Service Policy can be expanded to address these Standards.