**Information and Communications Standards Initial Recommendations Report**

**Phase 1 Survey Questions**

**Feedback survey on Phase 1**  
**Information and Communications Standards Initial Recommendations Report**  
  
The Standards Development Committee (the Committee) reviewing the Information and Communications Standards under the Accessibility for Ontarians with Disabilities Act (the Act) has completed its initial recommendations report and is asking for your feedback. Your feedback will help the Committee draft their final recommendations to the Government of Ontario.  
  
By completing this survey by **September 27, 2019**, you can help identify ways to remove Information and Communications barriers for people with disabilities in Ontario. While all feedback will be reviewed by the Committee, it may not be adopted in the final recommendations, or if/when after receiving the final recommendations the government amends the Standards.

Please note you will not receive an individual response. If you have any difficulty completing the survey, please contact the Ministry for Seniors and Accessibility:  
  
By email at icsdc@ontario.ca   
Toll-free at 1-866-515-2025 or 416-849-8276   
TTY at 1-800-268-7095 or 416-325-3408

**Two Different Surveys**   
The Committee’s report is separated into two parts: Phase 1, and Phase 2:

* Phase 1: The Committee reviewed all requirements in effect for 24 months or longer and voted on 30 initial recommendations related to these requirements.
* Phase 2: The Committee has developed a proposal, through one recommendation, for a new model to transform and modernize the regulatory approach to accessibility in Ontario.

There are two different surveys available to provide feedback on these two parts. This is the **Phase 1 Survey**. If you haven’t already, we encourage you to complete the [Phase 2 Survey](https://www.surveymonkey.com/r/Y5Z9FBL) after this one.

**Phase 1 Survey Format**  
These survey questions are based on the thirty (30) initial recommendations in Phase 1, organized into six (6) focus areas from the report. Please note the recommendations in these questions are shortened for the survey, and you can review the Committee’s full recommendations in [the complete report](https://www.ontario.ca/page/consultation-initial-recommendations-improve-accessibility-standards-information-and-communications). The six (6) focus areas are:

* Regulation in general or Sections 9-11;
* Section 12: Accessible formats and communications supports;
* Section 13: Emergency procedure, plans or public safety information;
* Section 14: Accessible websites and web content;
* Sections 15, 16, 17 and 18; Accessible educational material and training and
* Section 19: Public libraries.

**\* Completing the next section is optional. We respect your privacy and will only use this information to better understand your responses.**

**Demographics - Region  
  
In what region of Ontario do you live?**

Greater Toronto Area

Southwest

North

Eastern

South

I do not live in Ontario

I prefer not to provide any demographic information

**Demographic Questions - Individual or Organization  
  
Are you submitting feedback on behalf of yourself or an organization?**

Myself

Organization

I prefer not to answer

**\* Demographic Questions - Knowledge of Standards  
  
How would you rate your understanding of the Information and Communications Standards?**

Very Good

Good

Fair

**Organization Details**

**Demographic Questions - Type of Organization**

**An organization that represents people with disabilities or a disability interest group**

A municipality in Ontario

A private sector organization with no employees in Ontario

A private sector organization with 1-20 employees in Ontario

A private sector organization with 21-49 employees in Ontario

A private sector organization with 50+ employees in Ontario

Government of Ontario ministry, board, agency, commission, or authority

A not-for-profit organization with no employees in Ontario

A not-for-profit organization with 1-20 employees in Ontario

A not-for-profit organization with 21-49 employees in Ontario

A not-for-profit organization with 50+ employees in Ontario

Other (please specify)

**Self Details**

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**\* Demographic Questions - Self Identifying Individual  
  
Do you identify as a person with a disability?**

Yes

No

I Prefer Not to Answer

**Nature of Disability**

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**\* Demographic Questions - Self Identifying Continued   
  
Can you please tell us the nature of your disability (optional)?**



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**Long-Term Objective**

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\* The proposed new objective of the Information and Communications Standards is:  
  
“That people with disabilities be able to participate fully and equally in the creation and use of information and communications.”  
  
Does this objective support the Accessibility for Ontarians with Disabilities Act’s goal of an accessible Ontario by 2025?

* Yes

No

I don't know

\* If there is anything you would add, remove or change about this long-term objective, please let us know below.



**Recommendation 1: Feedback Requirements**

Top of Form

**\* Focus Area 1: The Integrated Accessibility Standards Regulation in General and Sections 9-11 of the Regulation**This survey will present each of the Committee's recommendations in brief. After each recommendation, you will be able to note whether you agree, disagree, or neither. You will then have the opportunity to provide more detailed feedback in a comment box below each recommendation.

**Recommendation 1: Feedback Requirements**  
The Committee learned that organizations were confused about the fact that there are different requirements related to feedback located throughout the Regulation.   
  
**The committee proposes the following:**  
The feedback requirements in Sections 11 and 80.50 in the Customer Service Standard of the Regulation should be combined and placed in the General Requirements section of the Regulation.  
  
In addition, the committee recommends that clear definitions of the terms “feedback” and “communication” be included.

Timeline: Immediate  
  
The intent of this recommendation is to remove any confusion caused by having requirements related to organizations taking in feedback about their level of accessibility in two different parts of the regulation.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 2: Usage of Portable Document Format (PDF)**

Top of Form

\* During a 2016 meeting of the Standing Committee on Finance and Economic Affairs the Standing Committee discussed a proposal to ban PDFs from government use. This is because PDFs are often inaccessible. While the proposal was not approved, it was referred to this formal regulatory review process. The Information and Communications Standards Development Committee concluded that while certain problems do exist with PDFs, banning them altogether is not the best solution, particularly since they work well when made properly accessible.

**The committee proposes the following:**Government should not ban the use of PDFs for any obligated organization.Timeline: N/A

The committee did discuss several alternative measures, including non-regulatory approaches such as increasing education for government employees on how to make PDFs accessible, but did not vote on the matter.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 3: Final Review of Regulatory Language**

Top of Form

\* Some recommendations are highly technical, and the committee is concerned about ensuring consistency in the understanding of those recommendations.  
  
**The committee proposes the following:**  
Government will use the technical expertise of the Digital Inclusion Technical Subcommittee to clarify intent and technical accuracy during the regulatory drafting stage related to Section 14.  
  
Timeline: N/A

This recommendation aims to remove confusion regarding the committee's recommendations and to ensure that the government can easily obtain clarification if needed**.**

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

**Recommendation 4: Products and Product Labels**

Top of Form

\* The current regulation states that products and product labels for goods are not required to be made accessible unless specifically mentioned in the standards. The committee agreed that there should, at the very least, be a digital format available for all products and product labels where applicable. The problem is that both federal and provincial governments regulate in this area, and so making a recommendation solely at the provincial level would be ineffective. Bottom of FormBottom of Form

**The committee proposes the following:**  
The Government of Ontario should meet with the Government of Canada to look for solutions to the problem of accessible products and product labels. These solutions may include clarifying jurisdictional authority over different products. In addition, it is recommended that Ontario meet with various industries to explore non-regulatory solutions to this issue.   
  
Timeline: One year for Ontario and Canada to produce a report that sets a strategic direction on the recommendations above. If a report is not created by the Governments of Ontario and Canada by this time, then the recommendation is that Ontario develop a strategy to address this, including creating an expert committee.

The committee recognizes that technology offers the potential for organizations to develop innovative solutions to this issue and would like the Government of Ontario to work with industries to encourage the development of non-regulatory solutions.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 5: Determination of Suitability**

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**\* Focus Area 2: Section 12: Alternative Formats and Communication Supports**

**Recommendation 5: Determination of Suitability**  
If a person with a disability asks an organization for an alternate format or communications support, that organization is required to consult with the requester about the request. The final decision on whether to provide what is needed is up to the organization. The committee noted that this is resulting in the provision of formats that do not meet the needs of people with disabilities.  
  
**The committee proposes the following:**  
Change regulation 12.(2) to state: “The obligated organization shall consult with the person making the request and gain agreement in determining the suitability of an accessible format or communication support.”

Timeline:Language to be changed immediately, and regulation to become effective six months after language change.This recommendation seeks to ensure that people with disabilities are properly consulted by organizations when determining the best way to give them access to information**.**

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 6: Timely Manner**

Top of Form

\* Section 12 of the regulation states that organizations must provide accessible formats in a “timely manner.” Stakeholder feedback revealed that people with disabilities and organizations often do not agree on the definition of “timely manner.”   
  
**The Committee proposes the following:**  
Change the regulation to state that organizations must provide accessible formats in a mutually agreed upon timely manner which considersthe circumstances of the requester, and the urgency of his or her request**.**

Timeline: Language to be changed immediately, and regulation to become effective six months after language change.  
  
The idea is similar to the intent of Recommendation 5, which is to ensure that important decisions that affect people with disabilities must be made with their participation. In this case, it would require that organizations and people with disabilities agree on what is meant by a timely manner.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 7: Agreement between People with Disabilities and Organizations**

Top of Form

\* While there are requirements for organizations to take feedback from the public, there is currently no mechanism to resolve disagreements that result from this**.  
  
The committee proposes the following:**This issue should be referred to the Accessibility Standards Advisory Council.

Timeline: Referred to the council immediately following the submission of the Final Recommendations Report.  
  
The council is best positioned to examine this issue.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 8: Harmonization of Section 12**

Top of Form

\* Section 12 of the Information and Communications Standards and Section 80.51 of the Customer Service Standards create duplicate requirements for providing accessible formats**.   
  
The committee proposes the following:**Requirements for alternate formats and communications supports should be combined and moved to the General Requirements section of the Integrated Accessibility Standards Regulation.   
  
Timeline: Immediate

The committee feels that moving the requirement for accessible formats into the General Requirements section of the regulation would make it clear that this requirement applies to all the standards, and would strengthen the requirements by making them easier to put in place.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 9: On-demand conversion-ready formats**

Top of Form

\* Currently, there is sometimes a delay when the government is asked to provide alternate formats of documents. The committee feels that technology has advanced to the point where there is no excuse for this delay. **The committee proposes the following:**The Government of Ontario and Legislative Assembly should produce a conversion-ready digital format of all public-facing materials and provide those materials immediately by having converted them ahead of time.

“Conversion-ready digital format” means a format that has the properties it needs to be readily converted into an accessible format.  
  
Timeline: January 1, 2021  
  
This recommendation would encourage the larger cultural shift needed to ensure that accessible formats become part of our day-to-day. This would be a significant new requirement for government, but given current technology, it is possible.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 10: On-demand American Sign Language and Langue des signes du Québec translation**

Top of Form

\* The committee understood that users of American Sign Language (ASL) and Langue des signes du Québec (LSQ) would not benefit from the proposed change set out in Recommendation 9. As such, it was agreed that while providing all public-facing materials in ASL and LSQ on-demand would simply be too burdensome, there are certain types of information and communications which should be available in these formats.

**The committee proposes the following:**  
The Government of Ontario should convene a meeting of Deaf and Hard of Hearing stakeholders to determine which materials should be provided by the Government of Ontario to the public in ASL and LSQ translation. The committee recommends that, following the meeting, the materials identified start to be made available on-demand.   
  
Timeline: One year for the meeting to occur, and January 1, 2021 for the requirement to be effective.Bottom of FormBottom of Form

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The committee’s intent is that the Government of Ontario find a fair and reasonable answer to the question of which types of materials should be available in ASL and LSQ on-demand.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**\* Focus Area 3: Section 13: Emergency Procedures, Plans or Public Safety Information   
  
Recommendation 11: Emergency requirements**Section 13 in the Information and Communications Standards, Section 27 in the Employment Standards and Sections 37 and 56 of the Transportation Standards are all related to emergency requirements. **The committee proposes the following:**The emergency requirements throughout the regulation should be brought together and moved into the General Requirements without material changes.  
  
Timeline: Immediate

Simplifying the requirements and making them easier to find would increase compliance and make them more effective.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

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**Recommendation 12: Unacceptable Emergency Outcomes and Preparedness**

Top of Form

\* The committee has concluded that the preparedness of all levels of government for emergencies involving people with disabilities is unacceptable.

**The committee strongly recommends the following to help protect the lives of people with disabilities and their families:**  
Disability and accessibility should be front and centre in the upcoming review of the Emergency Management and Civil Protection Act. The Minister of Community Safety and Correctional Services, who has responsibility for emergency management, should involve people with disabilities in the review. The minister should specifically include the Accessibility Standards Advisory Council. The same process should occur when the Fire Code is next reviewed.   
  
Timeline: Immediate

The intent of this recommendation is to address the lack of emergency planning focused on the needs of people with disabilities.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 13: Mobile applications and new technologies**

Top of Form

**\* Focus Area 4: Section 14: Websites and Web Content   
  
Recommendation 13: Mobile applications and new technologies**The current requirements apply to web-based applications only, which do not generally include mobile applications.

**The committee proposes the following:**  
The definition of website should be aligned with definitions used by other jurisdictions, including the US, EU and UN, to include mobile applications or other technologies as required. Relevant sections of these definitions have been provided in Appendix C.  
  
Timeline: By 2021, which aligns with the existing requirement for all websites to be accessible.  
  
The intent of this recommendation is to modernize requirements to include mobile applications under Section 14.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 14: Procurement**

Top of Form

\* The subcommittee noted that there are no accessible procurement requirements specifically related to Section 14. There are procurement requirements in the General Requirements section of the regulation, but the subcommittee suggested that these are not strong enough to result in accessible digital procurement. **The committee proposes the following:**The Government of Ontario and Designated Public-Sector Organizations shall incorporate accessibility design, criteria and features when procuring or buying goods, services or facilities. These criteria include:

Using qualified third-party evaluation certification services established through programs such as:

* The U.S. Access Board Trusted Tester Program
* Inclusive design or accessibility certificate programs such as those offered by colleges or universities
* Professional certifications from organizations such as the International Association of Accessibility Professionals
* Other professional service vendors that may qualify for such activities

Both manual and automated verification of compliance to technical web and software criteria  
  
Functional testing of usability by people with disabilities  
  
Interoperability with alternative access systems (as defined in the glossary)  
  
Sign language and other communication modalities  
  
The requirement to procure accessible authoring and development tools

This requirement would be in addition to the general accessible procurement requirements in the regulation. The reference criteria for authoring tools would be Authoring Tool Accessibility Guidelines (ATAG) 2.0 (A&B)  
  
Timeline: January 1, 2021. Where an obligated organization has entered into a contract before January 1, 2021, it is not required to meet the requirements of this section.   
  
The committee’s intent with this recommendation is to ensure that digital procurement by the Government of Ontario and the Broader Public Sector includes accessibility criteria, and that authoring and development tools that are procured are accessible.

The committee would also like non-digital procurement to be strengthened through the General Requirements section (Section 5 of the regulation). Since this is beyond the scope of the committee’s mandate, the committee would like this work to be referred to the Accessibility Standards Advisory Council and broader government bodies that manage procurement.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 15: Differentiating organizations/high-impact organizations**

Top of Form

\* As technology evolves, the number of employees is no longer a good indicator of the impact organizations have on Ontarians. The committee believes that Section 14 needs to adapt immediately to this reality, with the rest of the regulation to follow. **The committee proposes the following:**Create a definition for “high-impact” organizations. One such definition might be an organization that has one or more Ontario employees and meets either of the following criteria:

* One million or more users in Ontario (free or paid)
* $10 million or more in yearly global revenues

These newly defined high-impact organizations would have to comply with the Information and Communications Standards and report under the act while being subject to the same requirements as large organizations.  
  
Ontario should consult with the federal government and businesses to find the best path forward for regulating organizations that are under federal jurisdictions.

Timeline: One year with proactive outreach  
  
The committee’s intent with this recommendation is to ensure that all organizations that have a large impact on the province are complying with Section 14 of the regulation. This approach could be used for other requirements in the future, where appropriate.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 16: Significant refresh**

Top of Form

\* Currently, the requirements of Section 14 apply to organizations which either create new websites or significantly refresh existing websites. Stakeholder feedback and advice from the subcommittee suggested there is confusion about what “significant refresh” means, as the term is subjective. In addition, the committee learned that since Section 14 requirements apply to websites that are new or significantly refreshed, some organizations are choosing to update their websites only a bit at a time, thus avoiding the requirements.

**The committee proposes the following:**

* Any content that is new or which an obligated organization changes, updates or adds to a website must meet the accessibility requirements of Section 14.
* Furthermore, when content is added, changed or updated, it is recommended that organizations take the opportunity to make all content accessible.
* The committee recommends that content should include all functions, interactions and ‘branding’ (look and feel) for a site. It is recommended that Section 14 include examples for the sake of clarity.

Timeline: Regulation to be changed immediately, to be effective six months after the new regulation comes into force.  
The intent of this recommendation is to bring the Section 14 requirement closer to its intended function, which is to ensure that over time organizations develop greater accessible content for users with disabilities.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 17: Practicability**

Top of Form

\* Section 14 contains an exemption for obligated organizations which gives them the ability to claim that making a website accessible is “not practicable.” The committee feels that this term is too vague and might allow some organizations to avoid doing something they are able to do.   
 **The committee proposes the following:**Clearly define the term “not practicable,” bringing it in line with the term “undue hardship,” as set out by the Ontario Human Rights Code. A link to this terminology has been provided in Appendix C.**Bottom of Form**

Timeline: ImmediateThe intent of this recommendation is to reduce how easy it is for obligated organizations to use vague wording in the standards as an excuse to not fulfil their requirements. Aligning the language with that of the Ontario Human Rights Commission would bring significant clarity, as both the commission and the Human Rights Tribunal of Ontario have previously ruled on what undue hardship actually is.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 18: Harmonization and application across requirements**

Top of Form

\* Section 14 is intended to bring about greater accessibility in websites. However, the committee noted that while websites are mentioned in different sections of the regulation, only Section 14 explains the accessibility requirements. In the view of the committee, this makes it too easy for stakeholders to overlook or miss the requirements**.**

**The committee proposes the following:**It should be made clear that Section 14 applies to all sections of the regulation. This could be communicated as a reference to Section 14 wherever websites are directly referenced in the regulation.Timeline: Immediate  
  
The committee intends to ensure that there is no confusion among organizations about what requirements they must follow.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 19: Extranet exemption**

Top of Form

\* Section 14 defines “extranet websites” as an extension of intranets, and therefore exempt for most organizations. This has raised the issue of websites that require log-ins being considered extranets and therefore outside the scope of the requirements.   **The committee proposes the following:**The exemption for public-facing websites with a log-in (previously referred to as extranets) should be removed and these types of websites should be required to comply with the regulation.Timeframe: New public-facing websites with a log-in must comply by January 1, 2021, and all public-facing websites with a log-in must comply by January 1, 2023  
  
The intent of this recommendation is to completely remove the exemption for extranet websites, ensuring not only that these be required to comply with Section 14, but also that other internet websites not be able to avoid the requirement simply because they use log-ins. The committee recommends a longer timeframe for implementation as this would be a new requirement.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 20: Intranet exemption**

Top of Form

\* The committee believes that technology has advanced to the point where all organizations should be able to make their websites accessible under Section 14. Thus far, only the Government of Ontario and Legislative Assembly are required to make their intranet websites accessible. The subcommittee and committee do not believe there would be a major issue with extending this requirement to the broader public sector and large organizations. **The committee proposes the following:**The exemption for employee-facing websites and content (previously referred to as “intranets”) should be removed and, like all other websites, these types of websites should be required to comply with the regulation.  
  
Timeline: New employee-facing websites must comply by January 1, 2021, and allemployee-facing websites must comply by January 1, 2023  
  
The committee recommends that all definitions related to a type of website be removed and that Section 14 simply apply to all websites, internet or intranet, for all obligated organizations. Because this would be a new requirement, a lengthy timeline has been recommended.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 21: Pre-2012 exemption**

Top of Form

\* Section 14 provides an exemption from having to make web content accessible if that content was first published on a website before 2012. The committee believes that this exemption has created two problems. First, some organizations are using this exemption as a loophole that enables them to continue using some content from pre-2012 websites on new websites. The second problem is that organizations are taking useful pre-2012 content, such as historical records, off their websites when they move to a new or refreshed website because they do not have the resources to make this content accessible.  **The committee proposes the following:**A category should be created for older archived content. A potential model for this would be the federal Treasury Board archived content policy. This would grant an exemption only to non-active documents. Active content, which is anything that requires input or, like forms, can be changed, will not be covered under this exemption. Pre-2012 images used for navigation in refreshed websites must be made accessible.   
  
Timeframe: Immediate   
  
The intent of this recommendation is to ensure that no content intended for active use can be exempt, and that inactive or archived content meant for informational purposes only can remain exempt.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 22: Live captioning and audio description**

Top of Form

\* Currently, the Government of Ontario and Legislative Assembly are the only organizations which must meet the live captioning and audio description requirements in the Web Content Accessibility Guidelines (WCAG) 2.0. **The committee proposes the following:**

* The exemptions to the WCAG 2.0 guidelines regarding live captioning and audio descriptions should be removed by 2025.
* Organizations should put in place the infrastructure to support live captioning and audio description by 2025. Organizations which are currently exempt from this and are only required to prepare a multi-year plan should include progress toward this in their plan.
* The next committee may decide to accelerate this timeline. As such, the current committee recommends that the government explore and monitor technologies and resources available for live captioning and audio descriptions to help the next committee in its future decisions. This should start six months after this recommendation is adopted.

Timeline: Exemptions removed by January 1, 2025, to be evaluated for acceleration by the next committee  
The intent of this recommendation is to have organizations get ready to implement live captioning and audio descriptions by 2025. The committee’s intention is to establish a high standard, equal to CRTC standards for live captioning, of quality in live captions.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this**?**

**Recommendation 23: Web hosting location**

Top of Form

\* The committee has learned that some organizations are interpreting Section 14 to mean that if their websites are hosted on servers outside the province, they may claim exemption from its requirements.   
  
**The committee proposes the following:**  
Section 14 should apply to Ontario organizations no matter where their web servers are located.  
  
Timeline: One year  
  
The intent of this recommendation is to clarify that the regulations apply to organizations regardless of where their websites might be hosted.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

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**BotRecommendation 24: Purchase of accessible teaching/training materials**

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**Part 5: Sections 15, 16, 17 and 18: Accessible Educational Material and Training  
  
Recommendation 24: Purchase of accessible teaching/training materials**  
During its education and training discussions, the committee noted that the procurement of course materials is a good time to ensure that accessible versions are available. **The committee proposes the following:**It is recommended that organizations be required to order text books or other printed curricula materials from producers who agree to provide accessible or conversion-ready versions, in the same time frame as print copies. These materials should meet or exceed the obligations of education providers as described in the Ontario Human Rights Commission’s ‘Policy on Accessible education for students with disabilities’ (link included in appendix C).   
  
Timeline: Immediate

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

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**Recommendation 25: Definition of educational and training institutions**

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\* Education and training accessibility requirements in the regulation only apply to organizations that are classified as educational or training institutions, even though many organizations that do not meet that classification provide these services.  **The committee proposes the following:**That the government consider including all organizations, public or private, that provide formal education and training in the requirements.  
  
Timeline: Immediate

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* If you agree, what types of organizations should fall under the definition of formal?

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 26: Increasing captionist capacity**

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\* Committee members are concerned that there are too few trained captionists in the province. While training for captionists does exist in Ontario, the committee believes there is not enough supply to meet the potential demand**.  
  
The committee proposes the following:**The Government of Ontario and stakeholders should work together to establish a post-secondary course to train captionists.  
  
Timeline: Immediate

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 27: Accessibility in education**

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\* The committee believes that the inclusion of accessibility-related content in all levels of education curricula is one of the best ways to influence cultural change. **The committee proposes the following:**The government should explore ways to make education and skills development about accessibility, including e-accessibility, part of early years, elementary, secondary and post-secondary curricula.   
  
Timeline: Immediate  
  
The intent of this recommendation is to increase the amount of accessibility-related content in all levels of education in Ontario.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 28: Accessibility in information and communications tools and systems**

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\* Some committee members have noted that there is often a lack of knowledge regarding the needs of people with disabilities on the part of the designers of information and communications tools and systems. This leads to a lack of accessibility in these products. **The committee proposes the following:**All obligated organizations which provide education or training on the design, production, innovation, maintenance or delivery of information and communications tools and systems **must** include curricula that address the needs of people with disabilities, including Deaf and Hard of Hearing people who use ASL and LSQ.  
  
Timeline: One calendar year from effective date  
  
The intent of this recommendation is to ensure that information and communications tools and systems are created with accessibility features built-in and are maintained by individuals who are familiar with accessibility features.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?**Bottom of Form**

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**Recommendation 29: Accessibility in provincially regulated professions**

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\* Provincially regulated professions provide a wide array of services to Ontarians. Ensuring these professions understand the needs of people with disabilities would help make their services more accessible. The committee believes that education around accessibility in all provincially regulated professions could greatly enhance awareness and further prevent barriers. **The committee proposes the following:**Better internal training is needed for workers in provincially regulated professions. This could include better education on accessible formats, language, communication and IT supports. This should be worked into instructional planning and course design for organizations that provide education or training for these professions.   
  
Timeline: One calendar year  
  
The intent of this recommendation is to integrate accessibility into the education and certification of regulated professionals in Ontario.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Recommendation 30: Education standards**

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\* The Information and Communications Standards currently contain requirements related to education and training. When the committee first reviewed Sections 15-18 and proposed recommendations 24-29, the Government of Ontario had created committees to propose new Education Standards.   
  
At the time of completing this initial report, the status of these committees is under consideration by the government.

**The committee proposes the following:**  
If the government creates Education Standards with requirements that are equal to or greater than those requirements found in Sections 15-18 of the regulation, including the result of recommendations 24-29 made in this report, these sections can be moved to the Education Standards.  
  
If any elements of Sections 15-18, including the result of recommendations 24-29 made in this report, are not reflected in newly created Education Standards, these requirements must be retained in the Information and Communications Standards.The committee’s intent is to retain recommendations 24-29 while allowing the government to house these requirements in the most logical place in the Integrated Accessibility Standards Regulation.

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below.

\* Would this recommendation make it easier for Ontario to achieve accessibility? If not, what change could be made to achieve this?

**Part 6: Section 19**

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\* Section 19 relates to public libraries. **The committee has reviewed and consulted on this section and voted to confirm that it recommends no changes to this section.**

Agree

Neither agree nor disagree

Disagree

\* If there is anything you would add, remove or change about this recommendation, please let us know, using the comment box below**.**

**Final Question**

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\* Completing this section is optional. We respect your privacy and will only use this information to better understand your responses. **Having completed the survey, please reflect on either:**A) If you are answering for an organization, your organization’s efforts to comply with the standards. What is your organization doing now that is working? What are you struggling with?  
  
B) If you are a person with a disability, your experience as a person with a disability in Ontario. What is working for you? What is having an impact on your life? What are you struggling with?

Thank you for completing this survey and helping remove information and communications barriers for people with disabilities in Ontario. The committee will consider all public feedback in the drafting of its final recommendations. Bottom of Form

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