



AccessAbility
Advantage
MAKING BUSINESS ACCESSIBLE

Ontario Library Service – North

AODA, Integrated
Accessibility Standards
Regulation

Compliance Toolkit for
Ontario Public Libraries

2013



Ontario Library Service – North
Service des bibliothèques de l'Ontario – Nord



This report is a project of the \$15 million dollar investment in public libraries from the Ontario Ministry of Tourism, Culture and Sport through Southern Ontario Library Service and Ontario Library Service – North.

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Section I: Understanding AODA Compliance

Background

AccessAbility Advantage was contracted by Ontario Library Service – North to develop a resource to assist Ontario Public Libraries in their goal to achieve compliance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), Integrated Accessibility Standards Regulation (IASR). This report is a project of the \$15 million dollar investment in public libraries from the Ontario Ministry of Tourism, Culture and Sport through Southern Ontario Library Service and Ontario Library Service – North.

The purpose of the Accessibility for Ontarians with Disabilities Act (AODA) is to achieve a fully accessible province of Ontario by 2025, by “developing, implementing and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises¹”. These accessibility standards apply to all organizations in Ontario that provide goods and services and/or employ Ontarians.

These regulated standards are laws that guide businesses on essential requirements for people with disabilities to have equal access to the same benefits as people without disabilities. The Integrated Accessibility Standards Regulation (IASR) is one of the regulations under the AODA.

There is more than one way to achieve accessibility and comply with the standards. Requirements in each standard are objective-based, which means they allow an organization to develop their own policies, practices and procedures to achieve the prescribed outcome or intended result.

Generally, standards represent a minimum acceptable level of accessibility. Organizations often find they are able to surpass minimum standards with senior level commitment, careful planning, higher awareness and creative thinking.

¹ AODA, 2005: http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm#BK1



This compliance toolkit provides the requirements of the IASR that are applicable to public libraries, as well as guidance, tools, and checklists, to assist libraries with implementation of the legislated requirements of this regulation.

Making the Case for Accessibility

Accessibility is essential to meet the changing needs of society. People with disabilities are the largest minority group crossing every socio-economic segment of the population. Disabilities play no favorites and the number of people with disabilities is increasing.

Today people with disabilities make up 15% of the population. By 65 years of age, nearly 50% of people have some type of disability. Therefore it's expected people with disabilities will represent 20% of the population in the near future, as baby boomers in Ontario become seniors. Providing accessible products and services will become increasingly important to both public and private sectors as this demographic shift unfolds.

As employees age, they may also experience disabilities while still in the workforce. Supporting employees with disabilities is not only a human rights obligation, but an excellent decision to retain knowledge and skills, and maintain engagement and loyalty of all staff. Furthermore, retiring baby boomers may trigger a new wave of workforce shortages. Disability inclusive employers will find that people with disabilities are a largely untapped source of skilled, educated candidates. Myths about employees with disabilities are debunked when people with disabilities receive appropriate work supports.

Technology advances in areas of communications and mobility have made it possible to accommodate nearly every disability. Most people with disabilities are able to enjoy the same benefits as those without disabilities. Technology for people with disabilities has even entered mainstream applications for the average person such as automatic door openers, audio books, onscreen typing capabilities of tablets and smartphones, or voice activated technology in GPS devices, telephone directories, voice driven online searches and voice-to-text typing tools. It can easily be shown that the needs of people with disabilities drive innovation that benefits the rest of society.



By injecting accessibility goals and values into operating plans, policies and procedures, meaningful results and change can happen.

How to Use the Toolkit

This document is a guide to assist public libraries with complying with the AODA Integrated Accessibility Standards Regulation (IASR).²

Use this toolkit to determine compliance requirements and understand what your library must do to:

1. Meet general AODA organizational compliance requirements and
2. Meet public library specific requirements.

The IASR takes a graduated approach to compliance and the requirements are phased in between 2011 and 2025. By using the checklists and examples included in this toolkit, your public library will be able to develop your own multi-year Accessibility Compliance Plan and be able to respond to the accessibility requests of library patrons with disabilities.

The toolkit contains:

- General Information on the AODA, Accessibility Standards and reasons for improving accessibility.
- Overview of the Integrated Accessibility Standards Regulation and who has to comply.
- Steps for developing an AODA compliance plan.
- A detailed description of requirements, timelines, guidance and tools to support you in achieving compliance.

² IASR also known as [ONTARIO REGULATION 191/11](http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_110191_e.htm).
http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_110191_e.htm



Note:

This is not a legal document. The official language of the AODA ([S.O. 2005, Chapter 11³](#)) and the IASR are posted on the Ontario Government e-laws website. If there is any conflict between this document and the AODA and IASR, the AODA and the IASR are the final authorities.

The AODA and Accessibility Standards

An inclusive society that prevents discrimination and accommodates the needs of individuals is a stronger society where there is a place for all people to realize their worth, enjoy equal access to opportunities, and make contributions according to their talents, abilities and interests.

The purpose of the **Accessibility for Ontarians with Disabilities Act (AODA)** is to establish standards for accessibility that address all areas of society. The AODA is designed to bring about progressive improvement. The requirements mandate organizations to take proactive steps to become more accessible each year and meet prescribed timelines.

There are 5 standards under the AODA:

- Accessibility Standard for Customer Service
- Information and Communication Standard
- Employment Standard
- Transportation Standard
- Design of Public Spaces Standards (Accessible Standards for the Built Environment)

Under the AODA, each accessibility standard shall “set out measures, policies, practices or other requirements for the identification and removal of barriers with respect to goods, services, facilities, accommodation, employment, buildings, structures, premises or such other things as may be prescribed, and for the prevention of the erection of such barriers.”

³ http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm



The core principles of the AODA are also those of the Ontario Human Rights Code:

- Dignity
- Independence
- Integration
- Equal opportunity

The first AODA standard to be legislated is the **Accessibility Standard for Customer Service (ASCS)**. Also known as Ontario Regulation 429/07, it applies to every business in Ontario that provides goods or services to members of the public or other third parties, and that has at least one employee in Ontario. Like all AODA standards, it had graduated compliance dates with the final deadline for the private sector being January 1, 2012. The public libraries should have already met the requirements of the Customer Service Standard.

In 2011, the **Integrated Accessibility Standards Regulation (IASR)** was legislated. Also known as Ontario Regulation 191/11, this regulation integrated and harmonized three Accessibility Standards: the Information and Communication, Employment, and Transportation Standards.

The **Accessibility Standards for the Built Environment**, now known as the **Design of Public Spaces Standard**, became law on January 1, 2013 and was added to the Integrated Accessibility Standards Regulation. It addresses accessibility in public spaces such as outdoor public eating areas and playgrounds, parking and outdoor paths of travel. It only applies to new construction and major renovations to existing structures. It is anticipated that accessibility requirements that apply to buildings will become part of a revised Ontario Building Code at a later date.

It is important to note that the requirements in the IASR are not a replacement or a substitution for the requirements established under the Human Rights Code nor do the standards limit any obligations owed to persons with disabilities under any other legislation.



What is the Integrated Accessibility Standards Regulation (IASR)?

The Integrated Accessibility Standards Regulation (IASR) is comprised of 5 Parts:

Part I –General

The General section explains the relationship between the IASR and the Ontario Human Rights Code (the Code) and harmonizes common requirements, such as policy development and training, across the Information and Communication, Employment and Transportation Standards.

Part II –Information and Communications Standard

The Information and Communications Standard outlines how organizations will be required to create, provide and receive information and communications in ways that are accessible for people with disabilities. It includes requirements related to:

- Accessible Formats and Communication Supports
- Accessible websites
- Emergency procedures, plans or public safety information
- Public libraries

Part III –Employment Standard

The Employment Standard addresses accessibility across the employment life cycle and includes accessibility requirements for recruitment and employment retention. It also builds upon organizations' existing requirements under the Ontario Human Rights Code to accommodate persons with disabilities, to the point of undue hardship.

Part IV –Transportation Standard

The Transportation Standard will make it easier for people to travel in Ontario, including persons with disabilities, older Ontarians and families traveling with children in strollers. The Standard applies to conventional (e.g. TTC) and specialized (e.g. WheelTrans) public passenger transportation services under provincial and municipal jurisdiction, ferries,



other public transportation services (e.g. school buses, public transportation provided by universities and hospitals) and municipalities that license taxicabs. The transportation standard does not apply to public libraries.

Part IV.1 - Accessibility Standards for the Design of Public Spaces (Accessibility Standards for the Built Environment)

On January 1, 2013, the Integrated Accessibility Standards Regulation was amended to include accessibility requirements for the Design of Public Spaces Standard.

Beginning in 2015, and according to prescribed timelines, public and private sector organizations will have to meet accessibility requirements when constructing and maintaining new or redeveloped elements of public spaces including:

- Recreational trails and beach access routes
- Outdoor eating areas for public use
- Outdoor play spaces (such as playgrounds)
- Exterior paths of travel (such as walkways across parks or between buildings)
- Accessible on- and off-street parking
- Service counters and waiting areas

Organizations are not required to make changes to their public spaces, except where it is required by the Ontario Human Rights Code. The Design of Public Spaces standard applies when organizations build new or make major changes to existing elements of public spaces.

Part V –Compliance

Compliance measures related to the IASR consider the contravention severity and history and assigns monetary penalties for non-compliance.



Who has to comply?

All organizations that have at least one employee in Ontario, and provide goods, services or facilities to the public or to other organizations are subject to the regulation.

Under the regulation, businesses and organizations are divided into five classes:

1. The Government of Ontario and the Legislative Assembly⁴
2. Large designated⁵ public sector organizations with 50+ employees
3. Small designated public sector organizations with 1 to 49 employees
4. Large organizations⁶ with 50+ employees
5. Small organizations with 1 to 49 employees

An organization’s requirements and timelines for compliance are determined by the classification of that organization. Library classification is explained in Step 1 of “Steps for Developing and AODA Compliance Plan”.

Steps for Developing an AODA Compliance Plan

As explained above, public libraries have two separate sets of accountabilities under the IASR:

1. Meeting AODA compliance requirements as organizations that provide service in Ontario and have 1 or more employees.
2. Meeting the public library specific requirements of the Information and Communication Standard.

Section II of this toolkit covers what libraries need to do to as organizations to be in compliance with the IASR. Section (III) contains public library specific requirements and strategies.

⁴ This toolkit does not include requirements of the Government of Ontario or Legislative Assembly

⁵ “Designated” public sector organizations are identified in Column 1, Table 1 of [Ontario Regulation 146/10](http://www.e-laws.gov.on.ca/html/source/regs/english/2010/elaws_src_regs_r10146_e.htm) http://www.e-laws.gov.on.ca/html/source/regs/english/2010/elaws_src_regs_r10146_e.htm (Public Bodies and Commission Public Bodies - Definitions).

⁶ The IASR groups all other “organizations” together, whether non-designated public sector, private, or not-for-profit, and differentiates them as “large” or “small” by number of employees.



To determine your library's specific requirements you will need to work with key stakeholders such as your library board, staff and municipality and follow the steps below:

Step 1: Establish the class of your library

Step 2: Identify requirements based on your classification

Step 3: Establish roles and responsibilities

Step 4: Conduct a gap analysis

Step 5: Identify compliance goal

Step 6: Develop an accessibility plan

Step 7: Execute plan and evaluate outcomes

Step 1: Establish the class of your library

Public libraries in Ontario are classified as Designated Public Sector organizations for the purposes of compliance with the AODA and the IASR and are considered part of the municipality they operate within.

Public libraries are considered:

- 'Small designated public sector' if the library and municipality combined have fewer than 50 employees
- 'Large designated public sector' if the library and municipality combined have more than 50 employees

Libraries may consult their municipality or refer to existing municipal Ontarians with Disabilities Act plans to determine their unique relationship.

Compliance dates for each classification are noted for each requirement in subsequent sections of this toolkit.



Accessibility Advisory Committees:

Many municipalities have an Accessibility Advisory Committee (AAC), which is an AODA requirement for every municipality with a population greater than 10,000 people. AAC's are also active in smaller municipalities and some areas have joined together to have an AAC that serves more than one municipality.

Check with your municipality to find out about the status of their Accessibility Plan, and whether tools, resources and other support can be provided by the municipality or through a local AAC. Establish communication channels for your library to receive updates on IASR compliance activities and progress within the municipality which you may be able to leverage.

Step 2: Identify IASR requirements based on classification

The following charts show IASR requirements and timelines based on the size and classification of an organization. All requirement **deadlines are January 1st** of the year indicated, unless otherwise stated.

For an overview of your requirements, refer to the column that applies to your organization classification. Section II of the toolkit describes each requirement in more detail and provides guidance on how to achieve compliance.



IASR PART I: GENERAL REQUIREMENTS

REQUIREMENT:	Large Public Sector	Small Public Sector
Accessibility Policies (Section 3)	2013	2014
Accessibility Plan (Section 4)	2013	2014
Procuring or acquiring goods, services or facilities (Section 5)	2013	2014
Procuring or acquiring kiosks (Section 6)	2013	2014
OHRC and IASR Training (Section 7)	2014	2015
Accessibility Reporting (Section 8)	Dec. 31, 2013	Dec. 31, 2013

IASR Part II: INFORMATION & COMMUNICATIONS STANDARD REQUIREMENTS

REQUIREMENT:	Large Public Sector	Small Public Sector
Accessible Feedback Processes (Section 11)	2014	2015
Accessible Formats and Communication Supports (Section 12)	2015	2016
Emergency Procedures, Plans or Public Safety Information (Section 13)	2012	2012
New Internet Website and Web Content (Section 14(4)(1) and 14(5)(b))	2014	2014
All Internet Website and Web Content (Section 14(4)(2))	2021	2021
Public Libraries Accessible Format Information (Section 19)	2013	2013



IASR Part III: EMPLOYMENT STANDARD REQUIREMENTS

REQUIREMENT:	Large Public Sector	Small Public Sector
Accessible Recruitment and Employment Offers (Section 22, 23 and 24)	2014	2015
Employee Support Information (Section 25)	2014	2015
Accessible Formats & Communication Supports for Employees (Section 26)	2014	2015
Workplace Emergency Response Information (Section 27)	2012	2012
Documented individual accommodation plan (Section 28)	2014	2015
Return to work process (Section 29)	2014	2015
Performance Management Systems (Section 30)	2014	2015
Career development and advancement (Section 31)	2014	2015
Redeployment (Section 32)	2014	2015



Step 3: Establish roles and responsibilities

Each library should identify a staff person who is accountable for the overall implementation of the IASR. This could be the CEO or a senior manager within the library.

The requirements under the IASR may apply to multiple operations within an organization. For this reason it is best practice to identify people within the organization that have accountability and expertise in the areas impacted by the IASR to be part of the planning process.

For larger libraries we recommend creating an AODA committee that might include representatives from the following areas:

- Information Technology
- Human Resources and Diversity
- Client Services
- Occupational Health and Safety
- Procurement
- Library Patrons with Disabilities

Step 4: Conduct a gap analysis

Now that you have established what your library's requirements are, it is necessary to conduct a "gap analysis". Compare your library's obligations described in Section II to your existing policies and operating practices and procedures. Identify areas where further work is needed to address gaps between your current state and the desired future state of compliance with IASR.



Step 5: Identify compliance goal

Some requirements within the IASR are very clearly defined and specifically state compliance criteria. Other requirements are phrased in a manner that allows organizations to decide how they will meet the requirement and can be an opportunity to reflect the organizations' willingness and readiness to respond to the accessibility needs of clients and employees. Libraries, in discussion with stakeholders, should establish compliance goals. The library can choose to:

- Meet minimum requirements.
- Incorporate best practice suggestions along with meeting minimum requirements.
- Exceed minimum requirements for barrier identification and removal wherever possible within resource and budget constraints.

An organization can take advantage of AODA compliance planning to align with other initiatives or activities that are not specifically referenced as requirements under the IASR but will make an impact on barrier removal and create more inclusive opportunities for people with disabilities. For example:

- HR Diversity initiatives that include outreach to potential candidates with disabilities to increase representation of employees with disabilities in public libraries.
- Ensure that technology innovations for library service enhancements consider the accessibility needs of patrons with disabilities.
- Participation in community events that increase awareness of disability and inclusion like National Access Awareness Week or International Persons with Disabilities Day.

Be strategic in your approach, start small and make incremental changes. Focus on areas where you can see immediate results and realize the greatest impact.



Step 6: Develop an accessibility plan

The requirements of the IASR are designed to be phased in over a 9 year period. This gives organizations time to conduct a gap analysis, develop a staged implementation plan and ensure that sufficient resources and budgets are allocated to meeting the AODA requirements.

The accessibility plan should list the requirement, the compliance deadline and a description of how your library intends to meet the requirement.

A sample accessibility plan is included in this toolkit (Appendix B). It is important to remember that there are resources available to assist with compliance planning. A list of these resources is included in the toolkit (Section III).

Public sector organizations will need to document and maintain a multi-year accessibility plan as a requirement of the IASR. However, details about the type of reporting required and the reporting mechanisms for this regulation are yet to be provided by the Ministry of Economic Development, Trade and Employment.

Step 7: Execute plan and evaluate outcomes

Keep abreast of changes to the AODA. A review of all Standards takes place every 5 years. This may result in changes to either requirements or timelines.

Schedule a periodic review, in consultation with the community, to evaluate whether the activities that you have undertaken have had the desired impact.

Create proactive measures to remove access barriers as they are discovered.

Remember the end goal of the AODA is to create an inclusive society by 2025 by incrementally removing systemic barriers.



Section II: IASR Requirements

The IASR Requirements section of the toolkit includes a table showing the requirements that pertain to each section of the IASR and compliance timelines followed by:

- **What a library must do:** how the requirement applies to a library.
- **Guidance and best practices:** best practices or suggested approaches to achieve compliance.
- **Tools:** Tools in this section include sample policy statements and reference Appendices with more detailed content. Libraries may adopt or amend tools to suit their organizational structure and achieve the prescribed outcome of each regulation.

Part I: General Requirements

IASR General Requirements provide the framework for an organization to establish the accessibility strategy and goals that will define organizational commitment at all levels.

IASR General Requirements infuse accessibility objectives into all aspects of an organization's operations and deliverables, driven by plans and policies, and supported by resources and training.

Table 1: General Requirements and Timelines

REQUIREMENT:	Large Public Sector	Small Public Sector
Accessibility Policies (Section 3)	2013	2014
Accessibility Plan (Section 4)	2013	2014
Procuring or acquiring goods, services or facilities (Section 5)	2013	2014
Procuring or acquiring kiosks (Section 6)	2013	2014
OHRC and IASR Training (Section 7)	2014	2015



REQUIREMENT:	Large Public Sector	Small Public Sector
Accessibility Reporting (Section 8)	Dec. 31, 2013	Dec. 31, 2013

Accessibility Policies (Section 3)

The Requirement:			
Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in the IASR.			
Obligated organizations, other than small organizations, shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.			
Public sector and large organizations shall prepare one or more written documents describing their policies and make the documents publicly available, and shall provide documents in an accessible format upon request.			
DEADLINES	Large Public Sector	2013	Small Public Sector 2014

What each library must do:

- Develop and document⁷ policies for each IASR requirement the library must comply with.
- Include a statement that describes the library's commitment to accessibility in your policies.
- Make policies publicly available and provide accessible formats on request.

⁷ Small organizations that are not designated public sector are exempt from creating a written policy document and from writing an accessibility commitment statement. Policies can be shared verbally. Training of staff, volunteers and third party agents is still required.



Guidance and Best Practices:

The purpose of policies is to standardize operations in order to achieve goals and conduct business in a consistent manner, as well as train new staff. Each IASR Requirement must be supported in a policy.

There are three possible approaches for the development of accessibility policies:

- **Create a general IASR policy:** The policy can exist as an independent document addressing all IASR policy requirements. This would include policy statements that reflect all sections of the IASR including employment and procurement. The advantage of a general AODA IASR policy is that it is easy to reference and contains all relevant statements and compliance requirements in one place. A disadvantage is that it is not embedded in day to day practice and might be overlooked when other policies are applied.
- **Integrate into existing policies:** Integrating accessibility requirements by weaving them into existing policies and practices is considered best practice. Using this approach, libraries can ensure accessibility commitments are not overlooked.
- **Use a combination approach:** Integrate requirements into existing policies where appropriate to support an overarching AODA IASR policy.

Throughout this toolkit, sample policy statements are provided that may be adopted or amended to add to existing policies. Whenever accessibility policies are created or updated staff must be trained accordingly.

A “statement of organizational commitment” can be very detailed or brief. Such a statement may be added to diversity policies, customer service policies or maintained as part of a general IASR accessibility policy.

Tools:

- A sample “General Accessibility Policy” is found in Appendix B.



- Sample Statement of Organizational Commitment

The Library is committed to meeting the accessibility needs of people with disabilities in a timely manner and has a documented plan and policies detailing how the library achieves or will achieve compliance with requirements of the AODA Integrated Accessibility Standards Regulation.

Accessibility Plan (Section 4)

The Requirement:			
Every obligated organizations shall establish, implement, maintain and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under the IASR.			
Obligated organizations shall post the accessibility plan on their websites, if any, and provide the plan in an accessible format upon request. Organizations shall review and update the accessibility plan at least once every five years.			
Designated public sector organizations shall establish, review and update their accessibility plans in consultation with persons with disabilities or an existing accessibility advisory committee.			
Designated public sector organizations shall prepare an annual status report on the progress of measures taken to implement the strategy referenced in their Accessibility Plan. The status report will be posted on the organizations’ websites and will be provided in an accessible format upon request.			
DEADLINES	Large Public Sector:	2013	Small Public Sector: 2014



What each library must do:

- Upon completing a gap analysis, develop a multi-year plan that articulates how the library intends to prevent and remove barriers and meet its requirements under IASR in consultation with library patrons with disabilities and / or an accessibility advisory committee.
- Make the accessibility plan available to the public.
- Review and update the accessibility plan at least once every five years.
- Public libraries must prepare an annual status report and post it on their website.

Guidance and Best Practice:

An Accessibility Plan is like a road map that details how an organization is going to arrive where and when it needs to. The Accessibility Plan lays the foundation for what needs to be done in coming years so that annual business planning and budgeting cycles allot staff time and financial resources to accomplish requirements. The Plan must be reviewed and updated every five years to address changes in available technology, changes in society and any updates to the AODA Standards.

Check whether your Municipal Accessibility Advisory Committees has an Accessibility Plan you can leverage or develop your own using the sample provided in Appendix B.

General best practice is to schedule actions in the Accessibility Plan to take place at minimum in the year prior to the compliance deadline. Your library may prefer to create a plan that addresses requirements with more than one year lead time, particularly for complex matters that require participation or support from other third party agents or significant expenses that must be budgeted well in advance.

Steps to achieve compliance may be separated into smaller specific tasks or projects in the Accessibility Plan. This can improve understanding, clarify or focus objectives, make goals more manageable and success more tangible.

An Annual Accessibility Status Report is a report on the Accessibility Plan. This report details all accomplishments that have been achieved to date, actions in progress, and actions still to be taken.



Tools:

- A sample Accessibility Plan is provided in Appendix B.

The text content in the Accessibility Plan is **sample content only** for the purpose of illustrating how the framework could be used. All contents must be customized to reflect the actual compliance plan a library will follow in order to meet the IASR compliance requirements in a timely and effective manner.

Procuring or Acquiring Goods, Services or Facilities (Section 5)

The Requirement:		
All designated public sector organizations shall incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable ⁸ to do so.		
In cases where it is determined that accessibility criteria and features are not practicable, the organization shall provide an explanation upon request.		
DEADLINES	Large Public Sector: 2013	Small Public Sector: 2014

What each library must do:

- Add an accessibility statement to existing procurement policies.
- Update procurement templates or contracts to include an accessibility statement.
- If a decision is made to procure inaccessible goods, services or facilities the library should be prepared to provide an explanation as to why that decision was made.
- Train staff on changes to the procurement policies.

⁸ Practicable, definition: Capable of being effected, done, put into practice or accomplished; capable of being used for a specified purpose.



Guidance and Best Practice:

Purchasing and procurement can be a very specialized job skill. Knowing what to ask for is the key to getting what you want and often this depends on your ability to reference other standards, guidelines and expectations, or performance requirements.

It is anticipated that municipalities will be able to provide some support to libraries in the implementation of this requirement. Your municipality may have purchasing specialists on staff that can assist you. Your municipal Accessibility Advisory Committee (AAC) can be another strong source for guidance.

People with disabilities are often your best resources on what features or criteria enable them to experience benefits equal to others in specific circumstances. Many associations that support people with disabilities are available to provide information about accessibility criteria and features that benefit their clients.

Standards and Guidelines are another important component to ensuring your library is specifying the correct accessibility criteria or features. Being as specific as possible with respect to accessibility requirements will result in better purchasing decisions and barrier removal. Reference existing accessibility standards wherever available in your requests for proposals or contracts, for example:

- Ontario Building Code or the draft Accessible Built Environment Standard (pending) for new builds or major renovations.
- Web Content Accessibility Guidelines for websites, web applications and web content.
- EPUB⁹ specification for e-book collections.
- [Electronic and Information Technology Accessibility Standards \(Section 508\)](#).¹⁰

Provide written notice to current vendors to inform them of the library's commitment to accessible procurement and the deadline for your obligation to meet this requirement. Offer to assist vendors in understanding your requirements so that they can update their products or services accordingly.

⁹ The [EPub 3](http://www.idpf.org/epub/30/spec/epub30-overview.html): <http://www.idpf.org/epub/30/spec/epub30-overview.html> standard includes accessibility.

¹⁰ <http://www.access-board.gov/sec508/standards.htm>.



Tools:

- Sample procurement statement:

The Library is committed to making our services and environment accessible to people with disabilities. In accordance with our commitment, The Library will incorporate accessibility criteria and features into purchasing specifications when procuring or acquiring goods, services or facilities.

The library will document when it is not practicable to include accessibility criteria and features and make those reasons available upon request.

- Procurement Questions:

When purchasing new items for your collections, some of the questions to ask of vendors might include:

- Is the print material available in alternative formats such as e-pub, digital, large print, or audio format?
- Is the digital material in an accessible, conversion-ready format?
- Are there restrictions from the publishers with respect to copyright and conversion to a digital format?
- Are video and multimedia properties captioned and/or video described?
- Are all graphics described?
- Is the device or technology being purchased accessible? This might apply to photocopiers, telephones, tape recorders, e-readers, etc.

- Accessible Procurement Toolkits:

The federal government has an [Accessible Procurement Toolkit¹¹](#) for procuring mainstream technology or services for the general office environment.

It is anticipated that the Ontario Government will be posting guidance on accessible procurement at the accesson.ca website in the near future.

¹¹ <http://www.ap-toolkit.info/>



- Accessible Library Procurement Examples:

[ASCLA Toolkit – Think Accessible Before You Buy¹²](#)

[George Brown College Captioned Media and E-Text Policy¹³](#)

Self Service Kiosks (Section 6)

The Requirement:

Designated public sector organizations shall incorporate accessibility features when designing, procuring or acquiring self-service kiosks. This requirement does not limit an organization’s obligation to the general requirements in IASR Section 5.

Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

DEADLINES	Large Public Sector: 2013	Small Public Sector: 2014
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What each library must do:

- Identify self-service kiosks in use in the library including library catalog systems, public access computers or self-check-out terminals.
- Identify whether there are any barriers to using these terminals for people with disabilities.
- Ensure that all kiosks purchased or implemented after January 1, 2013 / 2014 include accessibility features.

Guidance and Best Practice:

In the context of the IASR General Requirements, “kiosk” means an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users access to one or more services or products or both.

¹² <http://www.ala.org/ascla/asclaprotocols/thinkaccessible/default>

¹³ <http://researchguides.georgebrown.ca/captionedmedia>



Examples of a self-service kiosk in the library might be a self-service checkout or library catalog terminal. Many libraries already have dedicated library catalog terminals that are equipped with assistive technology such as JAWS, or ZoomText. It is equally important to ensure that the databases and online tools accessed through library computer terminals are designed for accessibility and meet web and software accessibility standards.

Provide written notice to inform kiosk vendors of accessible kiosk criteria and deadlines so they have time to plan accessible product updates. Look for opportunities when renewing contracts or refurbishing existing kiosks to stipulate updated software and hardware features that will meet accessibility needs of people with disabilities.

Tools:

- Kiosk Accessibility Standards

The Canadian Standards Association Standard B651.2, **Accessibility Design for Self-Service Interactive Devices**, can be referenced as part of defining kiosk requirements. B651.2 provides design criteria for making interactive devices accessible, including kiosks, point of sale terminals, and ticketing machines, to reference a few examples.

- Library Database Accessibility

The [Association of Specialized and Co-operative Library Agencies¹⁴](#) has a wiki that describes the state of accessibility of some common library databases. The references are about two years old but are still useful.

Training Requirements (Section 7)

The Requirement:

Organizations shall ensure that training is provided on the requirements of the accessibility standards referred to in the IASR and on the Human Rights Code as it pertains to persons with disabilities, to all employees, volunteers, policy makers and third

¹⁴

http://ascla.ala.org/toolkit/index.php?title=Accessibility_to_Library_Databases_and_Other_Online_Library_Resources_for_People_with_Disabilities



parties providing goods, services or facilities on the library’s behalf.			
Training provided will be applicable to the duties of the role and be provided as soon as practicable or whenever policies change.			
Designated public sector and large organizations shall keep a record of the training provided and the number of people to whom training was provided.			
DEADLINES	Large Public Sector:	2014	Small Public Sector: 2015

What each library must do:

- Develop and document a policy in support of this requirement and ensure that all new hires or volunteers receive training appropriate to their role.
- Train all staff, including volunteers, on the Ontario Human Rights Code and the requirements of the IASR before the required timeline.
- Keep training records with dates and number of individuals trained.

Guidance and Best Practice:

Within an appropriate operational policy, add a policy statement committing to provide training to all employees, volunteers, policy makers and third parties providing goods, services or facilities on the library’s behalf to the appropriate operational policy. This requirement may also be included as part of a General Accessibility Policy.

Update the human resources manual, if any, to include IASR and Human Rights training (as it pertains to people with disabilities) as part of new hire orientation practices.

Training must be appropriate to the duties of the job. Specialized training may be necessary to acquire specialized skills in-house, such as accessible document creation or accessible web programming.

IASR training can be done over several components. Training can be more manageable if conducted in smaller modules to introduce new policies and practices as they are amended or created, in conjunction with the IASR requirements they support.



There may be an opportunity for library staff to participate in AODA training sessions developed or endorsed by the municipality.

Training can be done using your choice of training medium and may include classroom training, webinars or e-learning.

Tools:

- Training tools to support IASR requirements are being developed by the Ministry. Visit their website frequently as new information is always being added.
www.accesson.ca.
- The government of Ontario has recently launched material that organizations can use or adapt to support their AODA general training requirements,
www.AccessForward.ca.

Accessibility Reporting (Sections 8 and 86.1)

The Requirement:			
In accordance with Section 14 of the Act, designated public sector organizations are required to file accessibility reports with the Ministry of Economic Development, Trade and Employment every two years.			
DEADLINES	Large Public Sector:	Dec. 31, 2013	Small Public Sector: Dec. 31, 2013

Guidance and Best Practice:

As the compliance date approaches, the Ministry will provide additional information on how to file accessibility reports. It is anticipated that the filing process will be similar to the one used for reporting on compliance with the Customer Service Standard.

Note: The requirement to submit an accessibility report to the Ministry every two years is in addition to preparing an annual, public, report on the status of the Accessibility Plan.



In some cases a library may not be required to submit an independent report directly to the government. Rather their report may be part of a larger submission by a related municipality.

Tools:

Check the Making Ontario Accessible website

(<http://www.mcass.gov.on.ca/en/mcass/programs/accessibility/index.aspx>) regularly for updates and for reporting tools.

Part II: Information & Communication Standard Requirements

The goal of the Information and Communication Standard is to ensure that barriers to communication are reduced and that information is available to all people regardless of disability. This toolkit omits any requirements not applicable to public libraries.

Table 2: Information and Communication Standard Requirements and Timelines

REQUIREMENT:	Large Public Sector	Small Public Sector
Accessible Feedback Processes (Section 11)	2014	2015
Accessible Formats and Communication Supports (Section 12)	2015	2016
Emergency Procedures, Plans or Public Safety Information (Section 13)	2012	2012
New Internet Website and Web Content (Section 14(4)(1) and 14(5)(b))	2014	2014
All Internet Website and Web Content (Section 14(4)(2))	2021	2021
Public Libraries Accessible Format Information (Section 19)	2013	2013

The requirements under the Information and Communication Standard apply to information that libraries produce and to interactions with both the public and its employees.



In the context of the Standard the following definitions apply:

“Communications” means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

“Information” includes data, facts, and knowledge that exist in any format, including text, audio, digital or images conveying meaning.

For public sector organizations, the Information and Communication standard applies to:

- Information provided on a public facing website.
- Information produced by the organization that is not posted on the website.
- All channels of communication.

The Information and Communication standard does not apply to the following:

- Products and product labels;
- Unconvertible information or communications;
- Information that the obligated organization does not control directly, or indirectly, through a contractual relationship.

Accessible Feedback Processes (Section 11)

The Requirement:

Organizations that have processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.

Organizations shall notify the public about the availability of accessible formats and communication supports.

Nothing in this section detracts from an organization’s obligations imposed under the AODA Accessibility Standard for Customer Service.

DEADLINES	Large Public Sector: 2014	Small Public Sector: 2015
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What each library must do:

- Develop a policy that supports this requirement or add to an existing policy¹⁵.
- Identify existing feedback mechanisms currently in use at the library. This can include community surveys, suggestion boxes, focus groups, formal and informal interviews, open houses, suggestion boxes, website or complaints processes.
- Determine whether or not your existing feedback processes are accessible to library users with disabilities.
- Be prepared to provide alternative ways of making feedback processes more inclusive and accessible.
- When creating a feedback process, include a statement that tells users that alternative formats are available upon request.

Guidance and Best Practice:

Most public libraries engage the public in dialog about library related services and, therefore, provide various options for providing feedback. This requirement does not ask libraries to create 'new' feedback mechanisms; it requires only that existing feedback mechanisms be accessible.

The best practice is to make feedback mechanisms as inclusive as possible by identifying and removing accessible barriers. Examples of an accessible feedback mechanism might include:

- A paper survey that can also be filled out on the computer.
- A suggestion box that is mounted at a wheelchair accessible height.
- A 'contact us' or 'feedback' page on your website that meets website accessibility standards and that includes the statement "accessible formats and communication support are available upon request."

¹⁵ Libraries should already have a feedback mechanism in place that meets the requirements of the Accessibility Standard for Customer Service.



- Provide options for patrons to provide feedback including via computer, telephone, in person or in writing.

Key to meeting this requirement is having a procedure in place not only to inform library users with disabilities that alternative formats and communication supports are available, but also to respond to those requests using internal procedures.

At a minimum, libraries should be prepared to respond to accessibility requests on an as needed basis by consulting with the person with a disability to determine the most effective and timely supports. Examples include:

- Provide assistance completing written forms.
- Reading surveys aloud to patrons.
- Provide sign language interpretation at public meetings if a person who is deaf requests it.

Tools:

- Sample accessible feedback policy statement:

The Library communicates with people with disabilities in a manner that takes into account their disabilities. In accordance with our commitment, the library will ensure all feedback processes are accessible to people with disabilities by providing accessible formats and communication support upon request.

Accessible Formats and Communication Supports (Section 12)

The Requirement:

Organizations shall provide or arrange for the provision of accessible formats and communication supports:

- Upon request
- At no additional cost
- In a timely manner
- After consulting with the person making the request



Organizations will provide notification to the public about the availability of accessible formats and communication supports.			
If information or communications are decided by the organization to be unconvertible ¹⁶ , the organization shall provide the person requesting the information or communication with:			
<ul style="list-style-type: none"> ▪ An explanation as to why the information or communications are unconvertible; ▪ A summary of the unconvertible information or communications. 			
DEADLINES	Large Public Sector:	2015	Small Public Sector: 2016

What each library must do:

- Develop a policy and procedures that describe how the library will respond to requests for alternative formats and communication supports.
- Train staff and volunteers on how to fulfill requests for alternate formats.

Guidance and Best Practice:

Accessible Formats

The Standard does not specify what an accessible format is; however, the most common accessible formats include electronic versions of print material, large print documents or Braille. The key requirement in determining an accessible format is consultation with the person requesting the information. It is important not to make assumptions about what format people require based on their disability. For example, not all people who are blind require documents in Braille. They may prefer reading an accessible electronic document using a screen reader on their own computer.

It is recommended to allocate a budget for creating alternative formats.

¹⁶ For the purposes of this Part, information or communications are unconvertible if, it is not technically feasible to convert the information or communications; or the technology to convert the information or communications is not readily available.



To facilitate a timely response to the request for an accessible format, it is important that the document be “conversion ready” and that either an internal resource or external service provider be identified to produce the format requested.

A “conversion ready” document is defined as an electronic or digital format that facilitates conversion into an accessible format. Creating a conversion ready document can be as simple as creating a structured Word document or accessible PDF.

For documents that include complex graphics, charts or tables, it may be more cost effective and timely to have the document sent to a service that is able to produce the alternate format requested.

Libraries can take proactive steps toward ensuring that information is accessible by:

- Developing in-house expertise on how to produce accessible documents including Word and PDF documents by participation in a training course on this topic.
- Creating an accessible ‘template’ that includes the font style, font size, colour contrast and structural elements (such as headings, titles and lists) that form the basis of an accessible document.

Speak to your municipality to find out if document creation support is available for document processing, template development or training.

Communications Support

The Standard does not specify what accessible communication support is; however, the most common communication support includes American Sign Language (ASL), Telecommunication Devices for the Deaf or TTY, assistive listening devices and the use of telephone or video relay services. Communication support may also mean providing verbal information to a person with vision loss as an interim solution until the alternative format is available. As with accessible formats, the key requirement in determining an accessible communication support is consultation with the person making the request.



For planned meetings, libraries should make it best practice to ask if attendees require accommodations as part of the meeting invitation. Some typical meeting accommodations might include: use of microphones, sign-language interpreters, real time captioning or large print formats of documents to be distributed in advance.

Tools:

Creating Accessible Documents:

1. Accessible Digital Office Documents and Office Applications:
Practical techniques on how to author accessible documents in Word, PowerPoint and Excel formats.

<http://adod.idrc.ocad.ca/>

2. Microsoft Office Accessibility:
Using Word 2007 and Word 2010 to create accessible documents.

office.microsoft.com/en-us/word-help/creating-accessible-word-documents-HA101999993.aspx

Creating Accessible PDF Documents:

1. Techniques for developing WCAG compliant PDF's:
<http://www.w3.org/WAI/GL/WCAG20-TECHS/pdf.html>

2. WebAim: Defining PDF Accessibility
<http://webaim.org/techniques/acrobat/>

3. Best Practices for creating Accessible PDF content:
http://www.adobe.com/accessibility/best_practices.html

4. Authoring Techniques for Accessible PDF documents (Adobe Acrobat Pro)
<http://adod.idrc.ocad.ca/acrobat9>

Print and Writing Best Practices:

1. Clear Print Accessibility Guidelines
<http://www.cnib.ca/en/services/resources/clearprint/Pages/default.aspx>

2. Writing in Plain Language:
<http://www.plainlanguagenetwork.org/stephens/intro.html>



Alternative Format Production:

1. Description of Alternative Formats:

SNOW a project of the Inclusive Design Research Centre, OCAD University has a website that describes alternative formats in the context of the AODA.

<http://snow.idrc.ocad.ca/node/127>

2. Guide for Creating Multiple Formats - Canadian Government:

<http://www.collectionscanada.gc.ca/the-public/003/005003-4200-e.html>

3. T-Base Communication

Producer of alternative formats including: braille, large print, accessible PDF, Audio MP3 and DAISY.

Telephone: 1-800-563-0668

E-mail: info@tbase.com

4. Accessibil-IT Inc.:

Producer of Accessible PDF documents.

Telephone: (905) 491-6875

E-mail: info@accessibilit.com

Planning Accessible Meetings:

10 Steps for making your meeting accessible

http://www-03.ibm.com/able/news/accessible_meetings.html

How to Make Presentations Accessible to All:

<http://www.w3.org/WAI/training/accessible.php>



Emergency Procedures, Plans or Public Safety Information (Section 13)

The Requirement:

If an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

DEADLINES	Large Public Sector: 2012	Small Public Sector: 2012
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What each library must do:

- Create a policy to support this requirement or add to an existing policy.
- Identify existing written emergency procedures, plans or public safety information.
- Train staff and/or volunteers on the requirement and how to provide existing public emergency information in an accessible format or with communication supports.

Guidance and Best Practice:

It is a best practice for libraries to have written emergency procedures. These are often posted near exits, stairwells and elevators in a written format. This format is not accessible to people with print disabilities including some people with visual impairments, learning disabilities or cognitive impairments. These procedures must be made available in an accessible format. Best practices include:

- Creating an electronic version of the emergency procedures that can be posted on the library website or emailed when requested.
- Keeping a Braille and large print copy of emergency procedures on hand.

The IASR does not require that organizations meet any disability specific emergency procedures however libraries can improve the safety and security of staff and library patrons with disabilities by considering:



- Installation of visual alarms e.g. flashing lights that correspond to the audible alarm system.
- Tactile wayfinding aids.

Tools:

The Ministry of Economic Development, Trade and Employment has prepared online resources to assist organizations in meeting the requirements of this section. Please refer to “Making emergency information accessible to the public” on accesson.ca (http://www.mcsc.gov.on.ca/en/mcsc/programs/accessibility/info_sheets/info_comm/emergency_info.aspx).

Internet and Intranet Websites and Web Content (Section 14)

The Requirement:

Designated public sector organizations and large organizations shall make their internet websites¹⁷ and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA according to the following schedule:

By Jan. 1, 2014, all **NEW** internet websites¹⁸ and web content on those sites must conform to WCAG 2.0 Level A.

By January 1, 2021 **ALL** internet websites and web content must conform with WCAG 2.0 Level AA, with the exception of:

- Success criteria 1.2.4 Captions (Live); success criteria 1.2.5 Audio Descriptions (Pre-recorded).

Except where meeting this requirement is not practicable, this section applies to websites and web content published on a website after January 1, 2012, including web-based applications that an organization controls directly or through a contractual relationship

¹⁷ “Internet website” means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

¹⁸ “New internet website” means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.



that allows for modification of the product and/or web content.			
DEADLINES	Large Public Sector:	2014/2021	Small Public Sector: 2014/2021

What each library must do:

- Develop a policy in support of this requirement or add to an existing policy.
- Identify any new websites or web site redesign projects scheduled for launch as of January 1, 2014 and ensure that the websites meet WCAG 2.0 Level A.
- Conduct a web accessibility assessment to identify the remediation required to bring the entire library website into compliance with WCAG 2.0 Level AA by 2021 and develop an implementation plan.
- Inform internal developers or third party website application or content vendors of the library’s requirement to be WCAG 2.0 compliant.

Guidance and Best Practice:

Accessibility means that people with disabilities can perceive, understand, navigate and interact with information and communication technology, with or without assistive devices such as screen readers, large print or voice recognition. By following accessible design principles and accessibility standards during website development, accessibility is achievable.

The Information and Communication standard requires that websites meet the W3C Web Content Accessibility Guidelines (WCAG) 2.0¹⁹. The WCAG guidelines are internationally developed and accepted standards for web accessibility. They are based on four principles that all websites must be:

- Perceivable
- Operable
- Understandable and
- Robust.

¹⁹ <http://www.w3.org/WAI/>



Associated with each of these principles are guidelines and success criteria required to achieve Level A, AA, or AAA compliance. The AODA IASR requires initial compliance at Level A increasing to Level AA by 2021.

The IASR does **not** require libraries to redo their websites by 2014 to be in compliance. Rather the standard advocates a phased implementation that allows libraries to inject accessibility into any new website project being launched after January 1, 2014.

Integrating accessibility early in the design of a new website has been estimated as costing an additional 3% - 5% whereas remediating a website can increase costs by 50% - 70%.

The standard also allows for the fact that many websites contain old or archival content. Any content that existed prior to January 1, 2012 does not need to be made WCAG compliant. However any content that is posted after January 1, 2012 will need to be remediated either when the website is redesigned or as of 2021, whichever comes first. As such it is best practice to start making web content accessible now to avoid costly remediation later.

If the library has a contractual relationship with the database vendor or third party web application, the library is accountable for accessibility compliance. There are some exceptions to this requirement; however, they must be determined on a case by case basis. The exceptions are intended to cover instances where legacy, unconvertible technologies are part of the solution or where the organization purchasing the application has no ability to customize or change the product. This does not, however, absolve the organization from compliance in the long-term. In making a commitment to removing barriers to accessibility, organizations should make accessibility compliance a requirement in any web technology contracts.

A recommended best practice is to ensure that accessibility requirements are included in any procurement policies and practice. Commonly used strategies for procuring third party web applications or web based products include:

- Ask third party vendors to submit a WCAG compliance report;
- Validate the WCAG compliance claims of third party vendors by conducting accessibility tests;



- If a product is found to have accessibility issues, ask vendors to provide an accessibility roadmap for future releases.

We recommend that when libraries develop a new website that they attempt to meet WCAG 2.0 Level AA immediately. The work effort to meet Level AA standards from the initial design phase is significantly less than having to go back and remediate a site that only meets Level A standards and will save time and money.

Tools:

WCAG 2.0 Checklist

Includes success criteria for each level of accessibility is included in Appendix C.

Accessible Web Design

1. WebAim
Articles, techniques and tips on creating accessible information and communication. <http://webaim.org>

2. How to Meet WCAG 2.0
<http://www.w3.org/WAI/WCAG20/quickref/>

3. Accessible web page sample:
The Web Accessibility Initiative has created a before and after demonstration site that shows an inaccessible site and a version of the same site that has been remediated for accessibility. Each page includes annotations that highlight key accessibility barriers or repairs. <http://www.w3.org/WAI/demos/bad/>

Web Accessibility Testing Tools

1. There are numerous tools that libraries can use to check accessibility of their websites. There are 2 types of free accessibility checkers:
 - a. Websites that allow you to type in the URL of the library website and produce an accessibility report. E.g. www.achecker.ca



- b. Plug-ins for your browser that will highlight accessibility issues on the displayed page. E.g. [Web Accessibility Toolbar for Internet Explorer²⁰](#), [WAVE Toolbar²¹](#)
2. List of WCAG compliance testing tools:
www.w3.org/WAI/RC/tools/complete
3. Colour Contrast Analyzer Tool
www.paciellogroup.com/resources/contrast-analyser.html

Assistive Technology for Web Accessibility Testing

1. JAWS – Freedom Scientific
www.freedomscientific.com
2. NVDA – Free, Open Source screenreader
www.nvda-project.org/
3. Adaptech Research Network – Free and inexpensive adaptive technology database
<http://www.adaptech.org/en/downloads/fandi>
4. VoiceOver screenreader
Built-into MAC OSX.

WCAG Web Accessibility Demonstration Site

To illustrate what web accessibility means in practice, the Web Accessibility Initiative has created a “Before and After” demonstration site that shows an inaccessible site and a version of the same site that has been remediated for accessibility. Each page includes annotations that highlight key accessibility barriers or repairs <http://www.w3.org/WAI/demos/bad/>.

²⁰ <http://www.visionaustralia.org/>

²¹ <http://wave.webaim.org/toolbar/>



Part III: Employment Standard Requirements

The goal of the Employment Standard is to ensure that organizations take proactive measures to foster disability inclusive workplaces. The requirements instill proactive accessibility considerations throughout the employment life cycle. Employers will prepare documented policies and procedures that guide managers on providing accommodations that enable equal opportunities for candidates or employees with a disability.

REQUIREMENT:	Large Public Sector	Small Public Sector
Accessible Recruitment and Employment Offers (Section 22, 23 and 24)	2014	2015
Employee Support Information (Section 25)	2014	2015
Accessible Formats & Communication Supports for Employees (Section 26)	2014	2015
Workplace Emergency Response Information (Section 27)	2012	2012
Documented individual accommodation plan (Section 28)	2014	2015
Return to work process (Section 29)	2014	2015
Performance Management Systems (Section 30)	2014	2015
Career development and advancement (Section 31)	2014	2015
Redeployment (Section 32)	2014	2015

The Municipal Act requires that library boards adopt and maintain hiring policies. These existing policies can be updated to include requirements of the IASR Employment Standards. Libraries may be able to leverage their municipality's support or tools in the



implementation of the IASR Employment Standard. Bargaining agreements may also be a source for existing employment policies. Where bargaining agreements conflict with the Ontario Human Rights Code, the Code takes priority.

Requirements of the Employment Standard apply to organizations that are employers, in respect to employees that are paid employees; not volunteers or other non-paid individuals.

Recruitment (Section 22)

The Requirements:			
Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.			
DEADLINES	Large Public Sector:	2014	Small Public Sector: 2015

What the library must do:

- Update human resources policy to support the requirement that job offers include a statement that accommodations are available for people with disabilities
- Train managers to include a statement about the availability of accommodations during the recruitment process, in job postings.

Guidance and Best Practice:

IASR Section 22 may be fulfilled by including an accommodation statement in job postings. Often the accommodation statement is part of a diversity statement. Document the requirement in the human resources policy. Best practice in human resources management is to identify essential functions of the role and do a Physical Demands Analysis of the essential functions of the role. This level of detail may help an organization with possible challenges with determining reasonable accommodations. Be advised that a Human Rights Tribunal would extend “what is reasonable” for an accommodation, to the point of undue hardship. Cost of accommodation would rarely be acceptable grounds to determine what is “reasonable” for larger organizations.



Tools:

- Sample of a diversity and accommodation statement for job postings that may be adopted or modified by your library:

The Library is strongly committed to diversity and welcomes applications from visible minority group members, women, Aboriginal persons, people with disabilities, members of sexual minority groups and others who may contribute to the further diversification of ideas.

Reasonable accommodations are available upon request, to enable individuals with disabilities to perform the essential functions of the job.

- Human Resources Professionals Association Employment Standards Video Series:

The Human Resources Professionals Association, as part of an EnAbling Change partnership with the Government of Ontario, produced six short videos in the dealing with the requirements of the Employment Standard.

<http://www.hrpa.ca/Pages/AODA.aspx>

- Conference Board of Canada Employer's Toolkit:

This toolkit, developed by the Conference Board of Canada (www.conferenceboard.ca) is a resource that contains sample templates, language and guidance on meeting the all of the AODA Employment Standards requirements. [Employers' Toolkit: Making Ontario Workplaces Accessible to People With Disabilities](#)²²

²² <http://www.conferenceboard.ca/e-library/abstract.aspx?did=5258>



Candidate Assessment (Section 23)

The Requirement:			
<p>During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.</p>			
DEADLINES	Large Public Sector:	2014	Small Public Sector: 2015

What the library must do:

- Update human resources policy and procedures to support this requirement.
- Inform candidates how they will be evaluated or tested, and inform candidates that accommodations are available for people with disabilities, on request.
- Consult with job applicants that indicate the need for accommodation about the type of accommodation that they require.
- Train hiring managers on new accessible hiring policies and procedures.

Guidance and Best Practice:

IASR Section 23 comes into effect when employers make contact with a candidate to arrange for the assessment and selection process (more commonly known as an interview).

Inform candidates of your hiring process, such as phone interview, in-person interview, or skills demonstrations as well as any materials involved such as written tests. Any testing should be directly relevant to the essential functions of the job role.



Advise every candidate that accommodations are available to people with disabilities upon request. This may be accomplished verbally, or by adding a footer to email communications sent during the recruitment process.

People with disabilities are generally experts on their own accommodations. If an accommodation is requested, consult with the candidate to determine preferred accommodations.

Remember, it is not necessary to know about a medical condition, just the support that is required for the person to participate in the same evaluation and selection process as every other candidate.

At this stage it is not necessary to know what other job accommodations an applicant may require, if any. A candidate may volunteer information about adapted methods or tools they use to perform their duties proficiently; otherwise, stick to the script. Evaluate candidates with disabilities using the same questions, scenarios, and techniques as you do with any other candidates.

Tools:

- Sample of an email footer or script that may be used when making first contact with a candidate:

During our employee selection process the Library will use (**insert evaluation processes here**) to determine the successful candidate.

The Library is an equal opportunity employer and will provide reasonable accommodations to individuals with disabilities to participate in any part of the employment process. Please let us know the nature of your request and your preferred contact method, to arrange accommodations in advance.



Employment Offers (Section 24)

The Requirement:			
Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.			
DEADLINES	Large Public Sector:	2014	Small Public Sector: 2015

What the library must do:

- Update human resources policy and procedures to support this requirement.
- Include the library’s job accommodation policy with all job offers.
- Inform all new employees of the library’s policy and process for requesting any accommodations as part of the orientation process for all employees.

Guidance and Best Practice:

At this stage, it is appropriate to notify successful applicants of the library’s policies for accommodating employees with disabilities and informing them how to request workplace accommodations.

Workplace accommodations and accommodation plans are explained in subsequent sections.

Commit to arranging any agreed upon job accommodations as soon as practicable.

Employee Support Information (Section 25)

The Requirement:
Every employer shall inform its employees of the policies used to support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.



Employers shall provide this information to new employees as soon as practicable after they begin their employment.			
Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.			
DEADLINES	Large Public Sector:	2014	Small Public Sector: 2015

What the library must do:

- Update human resources policy and procedures to support this requirement.
- Provide training to employees that are appropriate to their role whenever workplace accommodation policies are added or changed.
- Provide information on accommodation policies and processes to new employees during orientation.

Guidance and Best Practice:

The IASR Employment Standard is aligned with the Ontario Human Rights Code and sets out proactive measures that will effectively guide employers to meet their duty to accommodate employees with disabilities. It does not replace or limit any obligations to people with disabilities found in any other legislation.

The process begins with informing employees of workplace accommodation policies so they will know their rights and how to request an accommodation. Knowing that support options are available can reduce anxiety in the event of illness or injury that could affect an employee’s job performance or even their livelihood.

Train managers and supervisors on recognizing accommodation requests and providing employee supports. Supervisors and managers will be more confident and make better decisions with a workplace accommodation process they can rely on. They will be better equipped to discuss types of accommodations with the employee; accommodations that may enable an employee to be more successful or return to productive modified work sooner. They will also be aware of sources of funding and any decision making protocol that must be followed.



Accessible Formats & Communication Supports for Employees (Section 26)

The Requirement:

In addition to obligations under IASR Section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform the employee’s job;
- Information that is generally available to all employees in the workplace.

The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.

DEADLINES	Large Public Sector: 2014	Small Public Sector: 2015
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What the library must do:

- Update human resources policy and procedures to support this requirement.
- Train employees and managers on the process for requesting/providing job related accessible formats and communication supports.

Guidance and Best Practice:

Employees have a right to access information that is needed to perform their particular job. Examples in a library setting include accessing printed material, electronic catalogues, email, intranet/internet, signage, verbal information, performance feedback, or emergency notification.

In addition to the information and communication relevant to a particular job there is information that all employees have access to or need to use as an employee of the library. This can include human resource systems, scheduling tools, policies and bargaining agreements, payroll and benefits information.



If an employee identifies that they have difficulties accessing work related information because of a disability, they are entitled to request accommodation. Following are some information and communication examples of workplace accommodation:

1. Providing assistive technology software to access digital information such text-to-speech software for someone with a print disability.
2. Providing a portable video magnifier for someone with low vision so that they are able to read ISBN numbers on books in the stacks.
3. Applying different communication strategies such using text messaging on a cell/smart phone to share instructions, announcements and have quick conversations with an employee with a hearing impairment.
4. Using accessible document creation protocols and training co-workers in creating accessible documents in Word, Excel and PDF to accommodate a co-worker who uses screen reading technology.
5. Ensuring electronic communication channels used in the library, such as email and intranet, are compatible with assistive technology.
6. Requesting a script in advance for a presentation to employees or arranging for live captioning of a meeting, to accommodate an employee with an auditory learning disability.

These examples are only hypothetical scenarios. Employers must consult with the employee making the request to provide an alternate means of accessing information. Employee requests/preferences should be included in an Individual Accommodation Plan, discussed below in relation to IASR Section 28.

Workplace Emergency Response Information (Section 27)

The Requirement:

Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.

If an employee who receives individualized workplace emergency response information



<p>requires assistance, with the employee’s consent, the employer shall provide the workplace emergency response information to the person(s) designated by the employer to provide assistance to the employee.</p> <p>Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee’s disability.</p> <p>Review individualized workplace emergency response information when the employee:</p> <ul style="list-style-type: none"> (a) Moves to a different location; (b) Overall accommodation plans are reviewed; (c) General emergency response policies are reviewed. 		
DEADLINES:	Large Public Sector: 2012	Small Public Sector: 2012

What the library must do:

- Update Human Resources and/or Health and Safety policy and procedures and/or Fire Safety Plan to support this requirement.
- Create an individual emergency response plan for each library employee who has a need for accommodation or support during an emergency, due to a disability.
- Identify designated emergency response support personnel and provide appropriate training.
- Regularly review the emergency response plan with the employee in accordance with the requirement.

Guidance and Best Practice:

The Ministry of Economic Development, Trade and Employment has prepared online resources to assist organizations in meeting the requirements of this section. In addition to guidance reference links discussed above for Section 13 Emergency Procedures, Plans or Public Safety Information, please refer to “Workplace Emergency Response Information” on accesson.ca

http://www.mcss.gov.on.ca/en/mcss/programs/accessibility/other_standards/iasr_2012/employment_iasr/sec27_workplace_iasr.aspx



Documented Individual Accommodation Plans (Section 28)

The Requirement:

Develop and have in place a written process for the development of documented Individual Accommodation Plans (IAP) for employees with disabilities.

The process to develop Individual Accommodation Plans (IAP) shall include:

1. The manner in which an employee can participate in development of an IAP;
2. The means by which the employee is assessed on an individual basis;
3. The manner by which the employer can request and pay for an evaluation by an outside medical practitioner or expert to assist in determining if accommodation can be achieved, and if so, how;
4. The manner in which the employee can request participation of a representative from the bargaining agent or other representative from the workplace in the development of an IAP;
5. The steps to take to protect privacy of the employee’s personal information;
6. Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
7. Where IAP is denied, the manner in which the reasons for denial will be provided to the employee;
8. Means of providing the IAP in a format that takes into account accessibility needs due to a disability.

Individualized accommodation plans shall:

- (a) Include any information regarding accessible formats and communication supports if requested;
- (b) Include individualized workplace emergency response information if required;
- (c) Identify any other accommodation that is to be provided.

DEADLINES	Large Public Sector: 2014	Small Public Sector: 2015
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What the library must do:

- Update human resources policies to include a workplace accommodation policy in support of this requirement.
- Develop and have in place a written process for the development of documented Individual Accommodation Plans (IAP) for employees with disabilities.



- Create an Individual Accommodation Plan for each library employee with a disability that addresses all of the stipulated requirements of IASR Section 28.

Guidance and Best Practice:

The purpose of Individual Accommodation Plans (IAP) is to formalize details of the accommodation. It can help to improve accountability and efficiency, prevent mistakes, settle disagreements and ensure consistent care of employees while meeting government requirements. The elements in the requirement, listed above, are quite clear about what needs to be done.

Both employee and employer have a responsibility to participate in a consultative process to determine what accommodation will be used.

Employers may ask for medical verification of restrictions and limitations that need to be accommodated. Medical diagnoses are confidential and should not be disclosed; however, vague notes need not be accepted. Employers can request a specific medical opinion on abilities and limitations in the context of essential duties of the role, in order to match the accommodation to the individual's specific needs.

Often documents such as a Physical Demands Analysis or a Functional Abilities Form are provided for medical practitioners and specialists to complete. In the instance of mental health challenges, an employer may prefer to use a Modified Global Assessment of Functioning Scale to better understand how to support their employee. Maintaining accurate and up-to-date job descriptions with essential duties defined is a best practice for human resources that will be an asset to this process.

Non-confidential information includes the abilities, limitations, restrictions, prognosis, and anticipated duration of accommodation. Only non-confidential information may be shared with those participating in the accommodation, such as co-workers in the same department. All medical information should be managed in accordance with the requirements of applicable personal health information protection regulations such as the Ontario Personal Health Information Protection Act (PHIPA)²³.

²³ [Personal Health Information Protection Act](http://www.health.gov.on.ca/en/common/legislation/priv_legislation/default.aspx)
http://www.health.gov.on.ca/en/common/legislation/priv_legislation/default.aspx



Both the employee and the employer will understand that either can refuse proposed accommodations. That does not mean negotiations stop. There is an onus to look for the next best solution that can satisfy both parties. In some cases, temporary accommodations can work while a better solution is phased in.

Accommodation is an ongoing process and should be reviewed at predetermined intervals, such as if the employee's condition changes or when an annual performance review is undertaken.

Tools:

- Sample workplace accommodation policy:

The following is a link to the “at work accommodation” policy used by York University. Universities provide a useful model to follow as they are also a unionized environment.

<http://www.yorku.ca/secretariat/policies/document.php?document=43>

- Individual Accommodation Procedures Guide:

A guide for developing an individual accommodation policy is also available from the Canadian Human Rights Commission on their website:

<http://www.chrc-ccdp.gc.ca/eng/content/part-4-individual-accommodation-procedures-guide>



Return to Work Process (Section 29)

The Requirement:			
Every employer shall develop, document and have in place a return to work process for employees absent due to disability who require a disability-related accommodation to return to work.			
The return to work process shall:			
<ul style="list-style-type: none"> (a) Outline the steps the employer will take to facilitate the return to work of employees absent due to disability; (b) Use documented individual accommodation plans as part of the process. 			
This return to work process does not replace or override any other return to work process created by or under any other statute.			
DEADLINES	Large Public Sector:	2014	Small Public Sector: 2015

What the libraries must do:

- Update human resources policies to include a return to work policy in support of this requirement.
- Document a return to work plan for employees with a disability that are returning to work, that takes into account their documented accommodation needs.

Guidance and Best Practice:

When an employee becomes ill or injured, you have a duty to accommodate them in a safe return to productive work, regardless of whether the injury or illness took place at work.

The return to work process includes an individualized accommodation plan as discussed in relation to IASR Section 28 above.

Important concepts in a successful return to work process include regular communication, support and follow-up.



Medical explanations of absence may be required and prognosis or projected duration of absence are important for the employer to maintain business operations, as well as plan any accommodations that may be required to assist an early and safe return to work.

Return to work processes should continue to align with the requirements of the Workplace Safety and Insurance Board.

Tools:

- Sample return to work policy:

The following is a link to the “return to work accommodation” policy used by York University.

<http://www.yorku.ca/hr/services/managers/illnessinjury.html>

- The Conference Board Employer’s Toolkit referenced earlier includes a sample return to work process that incorporates the requirements under this section.
- Canadian Human Rights Commission offers a Guide for Managing Return to Work in their archives:

<http://www.chrc-ccdp.gc.ca/eng/content/guide-managing-return-work>



Performance Management Systems (Section 30)

The Requirement:			
Employers that use performance management systems shall take into account accessibility needs and individual accommodation plans when using a “performance management” process in respect of employees with disabilities.			
DEADLINES	Large Public Sector:	2014	Small Public Sector: 2015

What the libraries must do:

- Update human resources policies and procedures in support of this requirement.
- Review and include accommodations detailed in an employee’s Individual Accommodation Plan (IAP) when administering performance management activities.

Guidance and Best Practice:

In the standard, “performance management” is defined as “activities related to assessing and improving employee performance, productivity and effectiveness, with the goal to facilitate employee success.”

A performance management system may be part of an elaborate enterprise management system capable of turning employee performance into a metric scorecard number. It may also be a simple Word document shared between an employee and appropriate managers, stating goals as they relate to the job description and organizational direction, achievements, and possibly areas for improvement. Performance management may also be casual, such as daily verbal feedback and/or praise.

A performance management process usually involves some form of person to person discussion of formally documented details where questions can be asked and explanations given. Both aspects of the communication need to be properly accommodated.



Possible scenarios where this requirement would apply could include:

- 1 **Online performance management system:** Confirm with the vendor whether the application is compliant with accessibility standards and compatible with screen reading software used by vision impaired employees.
- 2 **Performance management system maintained using Word documents:** Ensure that the document template is accessible or that an alternative format such as large print or Braille is provided if the employee requests it.
- 3 **Performance reviews include a meeting with the manager:** An employee who is hearing impaired has an accommodation plan that indicates a preference for sign language. Provide a sign language interpreter for the meeting so that praise and guidance are understood and the employee is given full opportunity to express questions and explain their performance achievements.
- 4 An employee with an anxiety disorder becomes agitated or uncomfortable in performance evaluations and tests. His individual accommodation plan indicates that having a representative from the bargaining unit present eases his condition. Provide notice in advance to arrange the accommodation.

Career Development & Advancement (Section 31)

The Requirement:			
An employer that provides “career development and advancement” to employees shall take into account accessibility needs, and accommodation plans of employees with disabilities when providing career development and advancement information to employees with disabilities.			
DEADLINES	Large Public Sector:	2014	Small Public Sector: 2015



What the libraries must do:

- Update human resources policies and procedures in support of this requirement.
- Review and include accommodations detailed in an employee's Individual Accommodation Plan (IAP) as part of any career development and advancement activities.

Guidance and Best Practice:

People with disabilities must receive the same opportunities as their co-workers without disabilities and that is also the case when it comes to opportunities for advancement, as well as opportunities for skills and experience development. This must be stated in policy and included in management and employee training, as well as employee orientation.

Possible scenarios where this requirement would apply could include:

1. The library has invited a guest speaker to deliver special work-related skills training. An employee who is hearing impaired may be comfortable with one-on-one communication by supplementing with lip-reading. In a group training situation, specialized amplification devices could be an accommodation for someone who is hearing impaired or American Sign Language (ASL) interpretation may be preferred. Refer to the accommodation plan and discuss with the employee what accommodation they expect will work best.
2. A workshop is taking place off-site. Call in advance to ensure the location is accessible for your employee with a mobility device.
3. A special project has been given to the library and will require support of three staff members. Ensure all staff members are able to receive information about the opportunity to apply to be on the project team. If notice of the opportunity is posted on a bulletin board, ensure the same notice is provided to staff with vision impairment in the manner indicated in their accommodation plan.



Redeployment (Section 32)

The Requirement:

An employer that uses “redeployment” shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans when redeploying employees with disabilities.

DEADLINES	Large Public Sector: 2014	Small Public Sector: 2015
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What the libraries must do:

- Update human resources policies and procedures to ensure that redeployment²⁴ processes consider the accommodation requirements of employees with disabilities as defined in their IAP.

Guidance and Best Practice:

Redeployment may also be used by an employer in the event of substantial organizational changes where redeployment may be an alternative to layoffs. Terms for redeployment are often defined in collective bargaining agreements.

Employee accommodations may still be required to enable the person to perform the essential skills in a redeployment strategy. When an organization must restructure staff, details of a person’s individual accommodation plan must be taken into consideration.

A trial period may be an agreed condition of redeployment to a new position.

²⁴ “Redeployment” means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.



Part IV –Transportation Standard

Public libraries have no requirements under the Transportation Standard. Visit the Ontario Government e-laws website for more information about the [Transportation Standard²⁵](#).

Part V –Compliance

The compliance section applies to both the IASR and the Accessibility Standard for Customer Service. The compliance section describes the role of the Ministry's Director, and defines contraventions and administrative penalties. An administrative penalty can be assigned to an organization for contravening the requirements of the IASR. The amount of the administrative penalty is determined by the severity of a contravention and the contravention history.

Contraventions, defined as major, moderate, or minor, are determined by the director.

- Minor contravention: contravention of an administrative requirement.
- Moderate contravention: contravention of a requirement for organizational preparedness.
- Major contravention: contravention of a priority requirement that includes, but is not limited to, a contravention that may pose a health or safety risk to persons with disabilities

Along with the severity of the contravention, the history of the contravention is examined as part of assigning administrative penalties.

- Minor contravention history: where there has been no more than one previous contravention within the current two reporting cycles period.
- Moderate contravention history: where there has been between two and five previous contraventions within the current two reporting cycles period.
- Major contravention history: where there has been six or more previous contraventions within the current two reporting cycles period.

²⁵ http://www.e-laws.gov.on.ca/html/source/regs/english/2011/elaws_src_regs_r11191_e.htm#BK35



It is important to note that individuals and corporations can be liable.

IASR administrative penalties are as described in Schedule 3 of the IASR. The penalties are described in the table below.

Table 3: ADMINISTRATIVE PENALTIES FOR CORPORATIONS

Impact of Contravention:		Major	Moderate	Minor
Contravention History:	Major	\$15,000	\$10,000	\$5,000
	Moderate	\$10,000	\$5,000	\$2,500
	Minor	\$2,000	\$1,000	\$500

The compliance section of the IASR also sets out a review and payment process.

It is important to be aware that, according to the Accessibility Directorate of Ontario (ADO), penalties are a last resort. The goal of the ADO is to provide resources, support and consultation to assist organizations with meeting the requirements.



Section III: Public Library Requirements

The Requirement: IASR Section 19

Every library board shall provide access to or arrange for the provision of access to accessible materials where they exist.

Library boards shall make information about the availability of accessible materials publicly available and shall provide the information in accessible formats or with appropriate communication supports upon request.

Library boards may provide accessible formats for archival materials, special collections, rare books and donations.

DEADLINE:	All Public Libraries: 2013
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What a library board must do:

- Develop policies, practices, and procedures in support of this requirement.
- Display public notice that accessible materials are available upon request.
- Catalogue existing on-site accessible materials by format, such as Braille, various audio formats, large print, ebook, so that you can respond to requests in a timely manner.
- Identify and document sources for accessible materials available through external partners or vendors such as Inter-library Loan Service (ILS), CNIB, and other service providers, or volunteer reading services.
- Train library staff and volunteers on:
 - Types of accessible materials, their features, benefits, suitability for different types of disabilities, and compatibility with personal assistive technology.
 - Locating, requesting and transferring existing accessible materials.



Guidance and Best Practice:

Inclusive design is defined as "the design of *mainstream* products and/or services that are accessible to, and *usable* by, *as many people* as reasonably possible ... without the need for special adaptation or specialized design." It is best practice to strive towards universal accessibility when acquiring new materials for library collections or when developing new and innovative ways of delivering library services. Universally designed products and services consider a wide range of user characteristics that include, but are not limited to age, race/ethnicity, size, gender, native language, and level of ability to move, hear, or see.

E-books are an example of a product that, when designed correctly, embrace universal design principles. Readers have the option of personalizing their reading experience:

- They can choose to read an e-book on their preferred device, whether it is a computer or a portable e-reader.
- Someone who is unable to hold a book or turn pages can use voice recognition on a computer to turn the page in an e-book.
- Senior citizens whose eyesight is deteriorating can adjust the font size and style on their devices.
- A person who is blind, has a learning disability or who has low language literacy skills can use the iBook app on an iPad and have the text read to them with the built in Voice Over screen reader.

Through incremental steps such as changes in procurement practices and requirements for accessible formats and communication supports the IASR is a tool that libraries can use to work towards universal accessibility. The standard does not yet require that the library make all of its collection accessible or that they be accountable for producing accessible formats. The requirements, in simple terms, ask that libraries actively research the availability of accessible materials, that they tell library patrons about what is available in an accessible format and that they make an effort to acquire the accessible format when it requested.

A library could choose to deliver services beyond the compliance requirements and choose to provide a service to create or acquire alternative formats. Options might include:



- Provide a CCTV in the library so that patrons with visual impairments can read materials in large print.
- Make a computer with scanning software and OCR, such as Kurzweil, available.
- Provide access to tape recorders or cd players for patrons using audio books.
- Develop a lending program for e-reader devices that are accessible.
- Offer a service to scan materials²⁶ that are only available in print and email it to patrons to read on their own computers.
- Assign a budget specifically for outsourcing the production of alternative formats.

Most libraries are already providing individualized services and accommodations to provide accessible formats of library materials to people with disabilities. To ensure consistent accessible service, library boards must formalize these service options by documenting their commitment in policy form and recording the procedures that all staff will follow.

The online catalog is an important source of information about the accessible materials in the library's collection. Ensuring that library staff is trained and knowledgeable about where to find or acquire accessible formats is crucial to provide an equivalent and accessible library experience.

Libraries can utilize metadata related to library materials to assist with the identification of accessible resources. For example the ONIX record of an ebook may include accessibility properties in the Books codelist.

“Providing access to materials where they exist” can be interpreted in many ways. Examples include:

1. Contacting publishers and inquiring about the availability of alternative formats for a particular book.
2. Arranging the transfer of physical materials, for example, through inter-library loan agreements, to a location where your customer may receive them.

²⁶ Libraries should comply with relevant copyright laws.



3. Delivery of materials to library patrons who are housebound or residing in an institution; a service currently offered by many libraries.

“Information about the availability of accessible materials” must be:

1. Made publicly available, such as on the library’s website, or with signage such as posters, or on bookmarks at library self-service checkouts.
2. Made available in accessible formats
3. Made available through communication supports

People with disabilities may request this information in an accessible format. Information may also be provided using communication supports. Examples may include:

1. If catalogues are not accessible, communications supports may be offered to assist in navigating library catalogue systems
2. Customers may appreciate verbal or written recommendations of their preferred genre from a library employee.
3. An electronic list of available materials that may be sent via email.
4. Signage, lists and other information about availability of accessible materials may also be requested in Braille.

“Library boards may provide accessible formats for archival materials, special collections, rare books and donations.” This is optional and may be accomplished in a variety of ways, depending on the nature of a person’s disability, such as volunteer readers, magnification machines or scanners with optical character recognition (OCR) that can translate print into digital text. The Canadian Copyright Act²⁷ allows not-for-profit organizations such as library boards to create accessible formats for archival materials, special collections, rare books and donations.

Discussion on Accessible Library Catalogues

The online library catalogues may be subject to the Information and Communication requirement of IASR Section 12, and/or Accessible Website and Web Content

²⁷ With certain limitations, at the request of a person with a perceptual disability, Section 32 of the Canadian Copyright Act allows for a non-profit organization, to make a copy or sound recording of a literary, musical, artistic or dramatic work in a format specially designed for persons with a perceptual disability. Perceptual disability would extend to people who are unable to turn pages due to physical disability. Canadian Copyright Act: <http://laws-lois.justice.gc.ca/eng/acts/C-42/index.html>



requirements of IASR Section 14 especially if they can be accessed from the library's public facing website. An audit or assessment of the accessibility of library catalogues is outside the scope of this project. However, library boards are strongly encouraged to undertake an evaluation of the accessibility of their catalogue search tools to benchmark the current state and understand what would be required to provide equal access to people with different types of disabilities.

The ability to navigate the library catalogue either online or at the library may depend on the nature of a person's disability and their ability to interact with the available technology. For example, accessibility of an online catalogue for someone who is vision impaired, will likely depend on whether the format of the information is structured and coded in a way that is compatible with screen reading software.

Once gaps are identified, the ground work for remediation can begin by informing vendors of accessibility requirements that support both the catalogue and catalogue search access points, such as the website or a kiosk. This practice was discussed earlier in relation to procurement (IASR Sections 5). For organizations with obligations to develop accessible procurement policies, if the nature of the contractual relationship with database vendors or web developers empowers the library to make changes, accessibility must be addressed and remediation added to the Accessibility Plan.

Tools:

The Ontario Library Association has a series of videos that depict common scenarios for providing an accessible library service for people who have a disability:

- Assistive Technology in the Library
- Understanding the Diversity of Library Customer Needs
- Accessible Library Service for a Person who is Deaf or Hard of Hearing
- Providing a Barrier Free Library Experience

The videos are available on the Ontario Library Association website: www.accessola.org.



Best Practice Guidelines for accessible publishing:

<http://accessiblepublishing.org/best-practices/>

EPub Accessibility:

<http://idpf.org/epub/30/spec/epub30-overview.html>

American Library Association - Library Services for People with Disabilities Policy

<http://www.ala.org/ascla/asclaisues/libraryservices>

Australian Library and Information Association – Policy on Library and Information Services for People with a Disability.

<http://www.alia.org.au/policies/disabilities.html>



Section IV: Appendices

Appendix A: Sample General Accessibility Policy



The Public Library

Policy Type: Operational

Policy Number:

Policy Title: AODA: Meeting the Requirements of the Regulations

Policy Approval Date:

Policy Review Date:



The Accessibility for Ontarians with Disabilities Act (AODA) 2005 imposes a legal duty on organizations to achieve accessibility and lays the framework for the development of province-wide regulations on accessibility (Ontario Regulation 429/07 Accessibility Standards for Customer Service; Ontario Regulation 191/11 Integrated Accessibility Standards). The Public Library meets the obligations set out in the Act and the regulations in partnership with the Municipality of XX.

Section 1: Statement of Organizational Commitment to meet the accessibility needs of persons with disabilities.

1. The Public Library establishes an accessibility plan, policies, practices and procedures that respect the dignity and independence of persons with disabilities. The library is committed to meeting the accessibility needs of people with disabilities and ensuring they will benefit from the same opportunities and services the library affords to all other people.

Section 2: Responsibilities

1. For the purposes of AODA the library provides services on behalf of the municipality and therefore, is considered along with the municipality, a “small/large²⁸ designated public sector organization.” The library complies with the obligations for this sector as set out in the AODA regulations.
2. The board ensures that the library complies with the spirit, principles and intent of AODA and designates the Chief Executive Officer (CEO) as the individual accountable for the organization’s compliance with legislation.
3. The CEO will ensure that policies and procedures comply with the AODA and regulations made under the AODA. The CEO will further ensure that all employees, volunteers, policy makers and third parties providing goods, services or facilities on the library’s behalf receive training on the requirements of the IASR and Human Rights Code, as it pertains to the duties of their role.

²⁸ Small designated public sector organizations have less than 50 employees. Large designated public sector organizations employ 50 people or more. Contact your municipality to find out what classification to follow for the purpose of determining compliance dates for IASR requirements.



Section 3: The Accessibility Plan

1. The library will work with the municipality to establish, implement, maintain and document a multi-year accessibility plan that will outline the library's strategy to prevent and remove barriers.
2. The process will be done in consultation with persons with disabilities.
3. The plan will be in place by January 2013/2014²⁹, reviewed and updated at least once every five years. An accessibility report will be conducted annually.
4. The plan and reports will be posted on the library's website and be provided in an accessible format upon request.

Section 4: Policies and Procedures

1. The library's policies will incorporate practices which support accessibility. In accordance with the AODA Integrated Accessibility Standards Regulation:
 - a. the purchasing policy includes accessibility criteria for procuring or acquiring goods, services or facilities and kiosks;
 - b. the Human Resource policies address training on IASR requirements and the Human Rights code, accommodation for applicants, support for employees, individualized emergency information, accommodation plans, performance management, career development and advancement, return to work and redeployment of employees with disabilities;
 - c. the Collection Development Policy addresses accessible material formats.
2. In accordance with the AODA Accessibility Standards for Customer Service, the library maintains a policy on accessible customer service.

²⁹ Enter the appropriate compliance date based on feedback from the municipality. Large public sector compliance is 2013, Small public sector compliance is 2014.



Section 5: Information & Communication

1. The library shall make its communications available, upon request, in accessible formats or communications supports for persons with disabilities and shall make the availability of accessible communications known to the public. Types of communications include:
 - a. Policies;
 - b. Accessibility plans;
 - c. Emergency procedures, plan and public safety information prepared for the public;
 - d. Forms, surveys and other tools used to gather feedback;
 - e. Information on collections/materials in accessible format;
 - f. Employment standards.

2. Accessible formats of the library's communications shall be made available:
 - a. In a timely manner;
 - b. At a cost that is no more than the regular cost charged to others for the communications;
 - c. In consultation with the person making the request.

Related Documents:

The Public Library. OP-03 Accessible Customer Service

***Accessibility for Ontarians with Disabilities Act (AODA)*, 2005. S.O. c.11**

***AODA, Accessibility Standards for Customer Service*, Ontario Regulation 429/07**

***AODA, Integrated Accessibility Standards Regulation*, Ontario Regulation 191/11**



Appendix B: Sample Accessibility Plan

The Library is committed to meeting accessibility needs of people with disabilities and has written policies to describe how commitments will be met in a timely manner.

The following is a proposed Accessibility Plan that details The Library’s organizational goals and timelines with accomplishments made to date, and future actions and resources required to achieve accessibility in accordance with AODA legislation.

2012

Action:	Comply with Accessibility Standards for Customer Service
Standard:	AODA, Accessibility Standards for Customer Service
Commitment:	The Library is committed to providing accessible customer service to people with disabilities and has established policies, practices and procedures in accordance with the AODA Accessibility Standard for Customer Service.
Status:	In Progress/Completed/etc
Achievements:	<p>Policy Completed</p> <p>Staff Training Completed __ (date)____ and attended by # of people</p> <p>Policy is available on our website</p> <p>Accessible Feedback Processes are published</p>
Next Steps:	<p>Train new staff</p> <p>Train all staff when policies are updated</p>



Action: Adopt and Implement Accessibility Plan & Policies

Standard: IASR, Section 4. Deadline: 2013 / 2014

Commitment: The Library is committed to providing an accessible and inclusive environment to employees and visitors with disabilities. The Library will adopt and maintain an Accessibility Plan and Policies to ensure goals related to accessibility are met.

Status: New

Achievements: Developed Accessibility Plan that addresses timelines and requirements of IASR in consultation with people with disabilities.
Developed and amended policies to include IASR requirements.
Shared the plan with employees and added plan commitments to operational activities.
Public notice of the Accessibility Plan posted on our website.

Next Steps: Annually review and report on the plan. Update the plan with accomplishments to-date and next steps for coming years.

Action Provide Training for All Staff on IASR and Human Rights

Standard: IASR, Section 7. Deadline: 2014 / 2015

Commitment: Training will be provided on the requirements of the IASR accessibility standards and on the Human Rights Code, as it pertains to people with disabilities, to all employees, volunteers, policy makers and third parties providing goods, services or facilities on the organization's behalf. Training provided will be applicable to the duties of the role and be provided as soon as practicable or whenever policies change.

Status: New

Achievements: TBD



Next Steps: Document IASR and OHRC training as part of onboarding process.
Evaluate number of trainees, plan training format, budget and schedule training to take place in 2013.

Action: **Document Policies and Procedures for provision of access to accessible materials**

Standard: IASR Section 19, Public Libraries. Deadline: 2013

Commitment: The Library is committed to providing access to accessible materials and will make information about the availability of accessible materials publicly available in accessible formats or with appropriate communication supports, upon request.

Where possible, The Library may provide accessible formats for archival materials, special collections, rare books and donations.

Status: In progress

Achievements: TBD

Next Steps: (See suggestions in toolkit checklist)

Action: **Add Diversity & Accommodation Statement to Job Postings & Job Offers**

Standard: IASR Sections 22, 23, 24. Deadline: 2014 / 2015

Commitment: The Library welcomes candidates with disabilities and will add a Diversity and Accommodation statement to job postings such that the public and those interested in employment with The Library will know of our commitment. When making offers of employment, The Library will notify applicants of its policies for accommodating employees with disabilities.



Status: New

Achievements: TBD

Next Steps: (See suggestions in toolkit checklist)

Note: The deadline for this requirement, as with most IASR Employment Standards that libraries will implement, is January 1, 2014 or 2015 depending on whether large public sector or small.

Gradually adding accessibility requirements will reduce costs and disruption and build knowledge and compliance readiness over time.

Action: Make Library Emergency Procedures, Plans and Public Safety Information Accessible Upon Request

Standard: IASR Section 13. Deadline: 2012

Commitment: The Library is committed to public safety and will make our emergency procedures, plans and public safety information accessible upon request, as soon as practicable, in an accessible format or with appropriate communication supports.

Status: New

Achievements: TBD

Next Steps: (See suggestions in toolkit checklist)

Action: Provide Individualized Emergency Information and Support to Employees with Disabilities

Standard: IASR Section 27. Deadline: 2012



Commitment: The Library is committed to a safe working environment for all employees. Employees with disabilities will receive individualized emergency information and support.

Status: In progress

Achievements: TBD

Next Steps: Add requirement from IASR Section 27 to HR Policy.
Refer to resources provided in Toolkit for Section 27.
Offer individualized emergency information to employees with disabilities.

Action: **Update Procurement Policy to Include Accessibility Criteria**

Standard: IASR Section 5, 6. Deadline: 2013 / 2014

Commitment: The Library will include accessibility criteria and features when facilitating procurement of goods, services (including kiosks) or facilities in accordance with AODA requirements.

Status: New

Achievements: TBD

Next Steps: In accordance with the Municipal Act, library boards will adopt procurement practices of the municipality. Contact municipality for guidance and support in implementing procurement policies.
Update purchasing or requisition instruction and forms.
Inform vendors.



2013

Action: Conduct a Web Accessibility Audit & Plan Remediation

Standard: IASR Section 14. Deadline 2014

Commitment: The Library is committed to providing accessible service to people with disabilities. In support of this commitment, the library will conduct an assessment of the accessibility of our website and access to online catalogues in order to identify gaps and plan for any required remediation. New website and web content created from 2014 onward and including content from 2012 onward will be accessible.

Status: New

Achievements: TBD

Next Steps: (See suggestions in toolkit checklist)

Action: Review All Feedback Processes for Accessibility

Standard: IASR Section 11. Deadline: 2014 / 2015

Commitment: The Library is committed to ensuring library feedback processes are accessible to people with disabilities and will provide accessible formats or communication supports upon request, and will notify the public that accessible formats and communication supports are available.

Status: New

Achievements: TBD

Next Steps: (See suggestions in toolkit checklist)



Action: **Update Existing Employment Policies to include requirements under the IASR.**

Standard: IASR Sections 25, 26 and 30 - 32. Deadline: 2014 / 2015

Commitment: The Library is committed to disability inclusive hiring and employment practices and will implement accessible Employment Standards according to AODA Integrated Accessibility Standards Regulation.

Status: New

Achievements: TBD

Next Steps: In accordance with the Municipal Act, library boards will adopt hiring policies and practices of the municipality. Contact municipality for guidance and support in implementing IASR employment requirements.

Update Human Resources policies and procedures to include remaining IASR Employment Requirements.

Train management and staff on new policies and practices.

2014

Action: **Prepare Accessible Formats & Communication Supports**

Standard: IASR Section 12. Deadline 2015 / 2016

Commitment: The Library will provide or arrange for the provision of accessible formats and communication supports upon request, at no additional cost, in a timely manner, and in consultation with the person making the request and will provide notice to the public about the availability of accessible formats and communication supports.



Status: New

Achievements: TBD

Next Steps: (See suggestions in toolkit checklist)

Note: This requirement is a general requirement for accessible formats and communication supports, in addition, the requirements of IASR Section 19 specific to public libraries.

2020

Action: Remediate Existing Internet Websites and Web Content to meet WCAG 2.0 Level AA

Standard: IASR Section 14. Deadline: 2021

Commitment: Ensure that all web content meets WCAG 2.0 Level AA standards.

Status: Future

Achievements: TBD

Next Steps: TBD



Appendix C: WCAG 2.0 Checklist

Principle 1: Perceivable

Web content is made available to the sense – sight, hearing, and/or touch

WCAG 2.0	Level	Web Checkpoint Description
1.1	A	Text Alternatives: Provide text alternatives for all non-text content so that it can be changed into other forms that people require, such as large print, Braille, speech, symbols or simpler language.
1.1.1	A	Non-text Content : <ul style="list-style-type: none">• All images, form image buttons and image map hot spots should have meaningful, descriptive, equivalent alternate text using the alt="text" attribute.• Images that do not convey content, are decorative or convey redundant information should be given null alt text (alt="") or implemented as CSS backgrounds.• Equivalent alternatives to complex images are provided in context or on a separate page.• Embedded multimedia is identified via accessible text.• Non-text content that is used to confirm that content is being accessed by a person rather than a computer is available in different forms to accommodate multiple disabilities (e.g. CAPTCHA).
1.2		Time-based media: Provide alternatives for time-based media.
1.2.1	A	Audio-only and Video-only (Prerecorded): <ul style="list-style-type: none">• A descriptive text transcript (including all relevant visual, auditory clues and indicators) is provided for non-live, web-based audio (audio podcasts, MP3 files, etc.).



WCAG 2.0	Level	Web Checkpoint Description
		<ul style="list-style-type: none"> A text or audio description is provided for non-live, web-based video-only (e.g., video that has no audio track).
1.2.2	A	Captions: Synchronized captions are provided for pre-recorded audio content in synchronized web based video.
1.2.3	A	Audio Description or Media Alternative (Pre-recorded): A descriptive text transcript or audio description audio track is provided for non-live, web-based video.
1.3		Adaptable: Create content that can be presented in different ways without losing information or structure.
1.3.1	A	Information and Relationships: Information, structure and relationships conveyed through presentation can be programmatically determined or are available in text.
1.3.2	A	Meaningful Sequence: The reading and navigation order (determined by code order) is logical and intuitive.
1.3.3	A	Sensory Characteristics: Instructions provided for understanding and operating content do not rely solely on sensory characteristics of components such as shape, size, visual location, orientation or sound.
1.4		Distinguishable: Make it easier for users to see and hear content including separating foreground from background.
1.4.1	A	Use of Colour: Colour is not used as the sole method of conveying information or distinguishing a visual element.
1.4.2	A	Audio Control: If any audio on a web page plays automatically for more than 3 seconds, either a mechanism is available to pause or stop the audio, or a mechanism is available to control audio volume independently from the overall system volume level.



WCAG 2.0	Level	Web Checkpoint Description
1.4.3	AA	<p>Contrast (Minimum): The visual presentation of text and images of text has a contrast ratio of at least 4.5:1, except for the following:</p> <ul style="list-style-type: none">• Large Text: Large-scale text and images of large-scale text have a contrast ratio of at least 3:1;• Incidental: Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement.• Logotypes: Text that is part of a logo or brand name has no minimum contrast requirement.
1.4.4	AA	<p>Resize Text: Except for captions and images of text, text can be resized without assistive technology up to 200 percent without loss of content or functionality. Deprecated elements should not be used for text formatting.</p>
1.4.5	AA	<p>Images of Text: If the same visual presentation can be made using text alone, an image is not used to present that text.</p>



Principle 2: Operable

Interface forms, controls, and navigation are operable

WCAG 2.0	Level	Web Checkpoint Description
2.1		Keyboard Accessible: Make all functionality available from a keyboard.
2.1.1	A	Keyboard: All page functionality is available using the keyboard, unless the functionality cannot be accomplished in any known way using a keyboard (e.g., free hand drawing). Scripts are keyboard accessible. If the content affected by scripting is not accessible, an alternative is provided.
2.1.2	A	No keyboard Trap: If keyboard focus can be moved to a component of the page using a keyboard interface, then focus can be moved away from that component using only a keyboard interface. If it requires more than unmodified arrow or tab keys, the user is advised of the method for moving focus away.
2.2		Sufficient Time: Provide users sufficient time to read and use content.
2.2.1	A	Timing Adjustable: If a page or application has a time limit, the user is given options to turn off, adjust or extend that time limit. This is not a requirement for real-time events (e.g., an auction), where the time limit is absolutely required or if the time limit is longer than 20 hours.
2.2.2	A	Pause, Stop, Hide: Automatically moving, blinking or scrolling content that lasts longer than 3 seconds can be paused, stopped or hidden by the user. Moving, blinking or scrolling can be used to draw attention to or highlight content, as long as it lasts less than 3 seconds.
2.3		Seizures: Do not design content in a way that is known to cause seizures.
2.3.1	A	Three Flashes or Below Threshold: Web pages do not contain content that flashes more than three times in any one second period unless the flashing content is sufficiently small, of low contrast, and falls below the



WCAG 2.0	Level	Web Checkpoint Description
		general flash and red flash thresholds.
2.4		Navigable: Provide ways to help users navigate, find content and determine where they are.
2.4.1	A	Navigational Features: A mechanism is available to bypass blocks of content that are repeated on multiple web pages.
2.4.2	A	Page Titled: Web pages have descriptive and informative page titles.
2.4.3	A	Focus Order: The navigation order of links, form elements, etc., is logical and intuitive, and preserves both meaning and operability.
2.4.4	A	Link Purpose: The purpose of each link (or form image button or image map hotspot) can be determined from the link text alone or from the link text and its context (e.g., surrounding paragraph, list item, table cell or table headers).
2.4.5	AA	Multiple Ways: More than one way is available to locate a web page within a set of web pages, except where the web page is the result of, or a step in, a process.
2.4.6	AA	Headings and Labels: Headings and labels describe the topic or purpose.
2.4.7	AA	Focus Visible: Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible.



Principle 3: Understandable

Content and Interface are understandable

WCAG 2.0	Level	Web Checkpoint Description
3.1		Readable: Make text content readable and understandable.
3.1.1	A	Language of Page: The default human language of each web page can be programmatically determined.
3.1.2	AA	Language of Parts: The human language of each passage or phrase in the content can be programmatically determined, except for proper names, technical terms, words of indeterminate language, and words or phrases that have become part of the vernacular of the immediately surrounding text.
3.2		Predictable: Make web pages appear and operate in predictable ways.
3.2.1	A	On Focus: When any component receives focus, it does not initiate a change of context.
3.2.2	A	On Input: Changing the setting of any user interface component does not automatically cause a change of context unless the user has been advised of the behavior before using the component.
3.2.3	AA	Consistent Navigation: Navigational mechanisms that are repeated on multiple web pages within a set of web pages occur in the same relative order each time they are repeated, unless a change is initiated by the user.
3.2.4	AA	Consistent Identification: Components that have the same functionality within a set of web pages are identified consistently.
3.3		Input Assistance: Help users avoid and correct mistakes.
3.3.1	A	Error Identification: If an input error is automatically detected, the item that is in error is identified and the error is described to the



WCAG 2.0	Level	Web Checkpoint Description
		user in text.
3.3.2	A	Labels or Instructions: Labels or instructions are provided when content requires user input.
3.3.3	AA	Error Suggestion: If an input error is automatically detected and suggestions for correction are known, then the suggestions are provided to the user, unless it jeopardizes the security or purpose of the content.
3.3.4	AA	Error Prevention (Legal, Financial, Data): For web pages that cause legal commitments or financial transactions for the user to occur, that modify or delete user-controllable data in data storage systems, or that submit user test responses, at least one of the following is true: <ol style="list-style-type: none">1. Reversible: Submissions are reversible.2. Checked: Data entered by the user is checked for input errors and the user is provided an opportunity to correct them.3. Confirmed: A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission.



Principle 4: Robust

Content can be used reliably by a wide variety of user agents, including assistive technologies

WCAG 2.0	Level	Web Checkpoint Description
4.0		Compatible: Maximize compatibility with current and future user agents, including assistive technologies.
4.1.1	A	Parsing: In content implemented using markup languages, elements have complete start and end tags, are nested according to their specifications, do not contain duplicate attributes, and any IDs are unique, except where the specifications allow these features.
4.1.2	A	Name, Role, Value: For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies.



APPENDIX D: AODA Compliance Planning Worksheet

AODA Integrated Accessibility Standards Regulation: Compliance Worksheet

REQUIREMENT	ACCOUNTABILITY	COMPLIANCE YEAR	PLAN
PART I: GENERAL			
1. Have an AODA IASR accessibility policy (s.3)			
2. Have a multi-year accessibility plan developed in conjunction with people with disabilities (s.4)			
3. Have an accessible procurement policy (s.5)			
4. Take accessibility into consideration when procuring or acquiring kiosks (s.6)			
5. Conducted training on the requirements of the IAR accessibility standards and on the Ontario Human Rights Code (s.7)			
6. Prepared Annual Accessibility Compliance Report (s.8)			
PART II: INFORMATION AND COMMUNICATIONS STANDARDS			
1. Have an accessible process in place for receiving and responding to feedback (s.11)			
2. Notify the public about the availability of accessible formats and communication supports (s.12)			
3. Have process to provide or arrange for the provision of accessible formats and communications supports, upon request (s.12)			
4. Provide emergency procedures, plans or public safety information in an accessible format or with appropriate communication supports, as soon as practicable, upon request (s.13)			
5. Make new internet and intranet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A (s.14)			
6. Make all internet and intranet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA (s.14)		2021	
7. Met Information and Communication Standard requirements for Public Libraries (s. 19)			



REQUIREMENT	ACCOUNTABILITY	COMPLIANCE YEAR	PLAN
PART III: EMPLOYMENT STANDARDS			
1. Notify employees and the public about the availability of accommodation for applicants with disabilities in the library’s recruitment process (s.22)			
2. During the recruitment process, notify applicants when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request (s.23)			
3. If a selected applicant with a disability requests an accommodation, consult with the applicant and provide or arrange for the provision of a suitable accommodation (s.23)			
4. When making offers of employment, notify the successful applicant of the library’s policies for accommodating employees with disabilities (s.24)			
5. Inform current and new employees (as soon as practicable after they begin their employment) of policies to support employees with disabilities (s.25)			
6. At the request of an employee with a disability, consult with and provide the employee with suitable accessible formats and communication supports for: <ul style="list-style-type: none"> • Information that is needed in order to perform the employee’s job; and • Information that is generally available to employees in the workplace (s.26) 			
7. Provide individualized emergency specific protocols to employees who have a disability, if their disability is such that individualized protocols are necessary and the employer is aware of the need (s.27)			
8. For employees with individualized emergency specific protocols who require assistance and who provide consent (i.e. Persons Requiring Assistance [PRAs]), provide their individualized protocol to the person designated to provide assistance (s.27)			
9. Review the individualized emergency specific protocols, <ul style="list-style-type: none"> • When the employee moves to a different location in the organization; 			



REQUIREMENT	ACCOUNTABILITY	COMPLIANCE YEAR	PLAN
<ul style="list-style-type: none">• When the employee's overall accommodations needs or plans are reviewed; and• When the employer reviews its general emergency specific protocols (s.27)			
10. Have a documented process: a. For the development and documentation of individual accommodation plans for employees with disabilities (s.28) b. For the development and documentation of a return to work plan and accommodations for employees with disabilities (s.29) c. For performance management, career development and staff redeployment that requires that accessibility needs and individual accommodation plans for employees with disabilities be considered in the overall process (s.30, 31,32)			

