

MEMORANDUM

To: Members of Accessibility Advisory Committee

From: Dino Basso
Commissioner of Corporate Services

Date: June 15, 2021

Re: Update on Legislated Web Requirements

Web Content Accessibility Guidelines under AODA

The [Accessibility for Ontarians with Disabilities Act](#) (AODA) is an Ontario law mandating organizations follow certain standards to become accessible to people with disabilities. There are five standards of the AODA: Information and Communications; Employment; Transportation; Design of Public Spaces; Customer Service.

The Information and Communication Standard lists rules for organization to create, provide and receive information and communication that people with disabilities can access, providing an equal chance to learn and be active in their communities.

Web Content Accessibility Guidelines (WCAG) is an international standard developed through the World Wide Web Consortium (otherwise known as W3C) for making websites and web content accessible to a broader range of users with disabilities. Section 14 of the Information and Community Standard relates to Accessible Websites and Web Content and sets out that designated public sector organizations and large organization must ensure all websites and web content conform with WCAG 2.0 Level AA by January 1, 2021. Previously, sites had to meet a Level A standard. Examples of Level AA requirements include:

- Colour contrast is, in most instances, at least 4.5:1
- Alt text or a similar solution is used for images that convey meaning
- Form fields have accurate labels
- Status updates can be conveyed through a screen reader

Under AODA, designated public sector organizations, which are defined by the Regulation, must file accessibility reports [every two years](#). Organizations who do not meet accessibility legislation could be subject to fines.

99% of content posted to York Region's core website meets accessibility legislation but updates to structural elements of the site are required

The current implementation of York Region's public facing website, [york.ca](#), was developed and launched in 2014 and was designed to meet and, in some cases, exceed Level A standards, which was the minimum accessibility standard at that time. Today, York Region uses a third-party accessibility and quality assurance tool to regularly scan the website for areas of non-compliance. Content on the website continues to pass accessibility requirements and any newly published content is checked daily to ensure it conforms to more than 60 overarching criteria within the WCAG 2.0 Level AA standard. Structural elements of [york.ca](#) have been flagged as non-compliant. These elements are not unique to websites of similar scale and do not affect a users' ability to interact with content published to [york.ca](#)

Given the limitations of the platform, York Region's employs a number of best practices to ensure the website's content is near 99% compliant on any given day. Examples include:

- Videos on have closed caption
- High contrast and scalable font
- Text is structured so it can be read by computer-assisted aids

The site structure of [york.ca](#) is limited by the technology in which it is built on and prohibits the ability to meet all web accessibility requirements without incurring substantial costs. As a result, there is an identified need to move to a new web platform to allow York Region to offer an enhanced user experience to its residents, such as self-service opportunities, and to meet accessibility requirements.

York Region affiliate websites meet Level AA legislation

York Region is responsible for reporting compliance of [york.ca](#) and several affiliate websites, including [yorklink.ca](#), [vivanext.ca](#), [yrt.ca](#), [yrpsb.ca](#) and [yvp.ca](#)

The affiliate websites all report a range of compliance scores between 75% to 96% when compared to the success criteria of WCAG 2.0 Level A and AA. Affiliate website owners continue to work through updating their websites to improve compliance. It is important to note the dynamic nature of a website requires regular scans to ensure compliance. Scans will show a score at a given point in time and site owners constantly work to increase compliance scores and get as close as possible to 100%. The work to maintain compliance is never done.

COVID-19 impacts delay york.ca project

The last major update to york.ca was completed in 2014. A project was slated to begin in 2019 to procure a new software solution and professional services to host an upgraded and accessible york.ca.

On March 25, 2020, York Region declared a State of Emergency following rising concerns of COVID-19. Organizational efforts were refocused to support a Regional emergency response and project work to procure a new platform for York Region's websites (york.ca and myportal.york.ca) was placed on hold. The *Websites Redesign, Development and Implementation* project was reinstated in the fall of 2020 with COVID-19 pressures easing at that time, resulting in a longer than anticipated procurement. The project is currently in the negotiation stage of the procurement cycle, a vendor has been selected and final award is slated for mid-July.

[York.ca](http://york.ca) is a large, complex website with a number of links to other systems and customizations to improve the user experience. Upgrading a website with the scale and complexity of york.ca requires comprehensive professional, development and implementation services. A detailed workplan has been developed to deliver an updated york.ca in Q2 of 2022. Once launched, the updated website will provide greater flexibility and improved self-service features for residents while meeting compliance with the Web Content Accessibility Guidelines 2.0, Level A and AA.

York Region will meet WCAG Level AA compliance in Q2 of 2022

An Accessibility Report will be submitted to the Ministry in December 2021 citing York Region's workplan to meet legislative web compliance in Q2 of 2022.

Communication will be sent to Mary Bartolomucci, Acting Assistant Deputy Minister at the Ontario Ministry of Seniors and Accessibility to advise of the challenges York Region is experiencing meeting Level AA and to brief the ministry of the proposed workplan to upgrade york.ca.

An update will be brought to the York Region Accessibility Advisory Committee in September 2021 to report on the status of the Websites Redesign, Development and Implementation project and to seek this committee's feedback on the proposed update and accessibilities features for a new external facing website (york.ca).



Dino Basso
Commissioner of Corporate Services

eDOCS #13073160