

October 22, 2021

Hon. Raymond Cho  
Minister for Seniors and Accessibility  
777 Bay St, 5<sup>th</sup> Floor  
Toronto, ON M7A 1S5

Dear Minister Cho,

On behalf of Ontario's public universities, colleges and K-12 English public, French public and English Catholic school boards, we would like to express our appreciation to you and the Ontario government for all you are doing to make the province's physical and digital infrastructure more accessible and inclusive for all Ontarians. The December 31, 2021 deadline for the Ministry's Accessibility Compliance Report for public sector organizations is fast approaching and we would like to provide additional information and proposed considerations for your review.

Ontario universities, colleges and school boards have been working hard to help ensure the province's educational campuses are accessible, inclusive, and promote equity and diversity through a systemic and wholistic approach. All universities, colleges and schools are committed to ensuring institutions meet accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA).

It is in our collective commitment to AODA implementation and ensuring the best possible outcomes for all Ontarians, that we have undertaken a careful review of the Compliance Report and share concerns, specifically in regards to question 14 which states as follows:

*As of January 1, 2021, do all your organization's internet websites conform to [WCAG] 2.0 Level AA (except for live captions and pre-recorded audio descriptions)? Please indicate in the comment box provided the complete names and addresses of your publicly available web content, including websites, social media pages, and apps.*

Given the complex digital environment universities, colleges and school boards exist within, we have noted that question 14 poses great difficulty in terms of accurate and feasible reporting. Universities, colleges and school boards offer various services through department, project-based and individual school websites in order to deliver quality education to all students, create inclusive and accessible learning spaces, and support faculty/teacher-led initiatives.

For these reasons, our universities, colleges and schools maintain extensive and complex web-based infrastructure to adequately support the critical academic and administrative responsibilities required in learning environments. As a result, question 14 does not adequately capture the complexity of institutional web domain systems given the thousands of Uniform Resource Locators (URLs) that currently exist within an institution's digital environment.

We propose that all Ontario universities, colleges and publicly funded schools report compliance for the websites and digital areas we are responsible for, and additionally help educate and support others for websites which we are not directly responsible over. We propose that Ontario universities, colleges and schools submit the following information to the Ministry in response to

the AODA compliance report, question 14, which would allow institutions to report their web and digital assets effectively and efficiently:

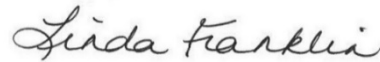
1. Main URL (i.e., [www.university/college/school.ca](http://www.university/college/school.ca)) and top-level subpages managed by the central web/communications departments, as well as any separate microsites managed by those staff
2. Main social media accounts (LinkedIn, Twitter, Facebook, Instagram) – i.e., the accounts embedded in main websites or used as primary sources of information (with no web-based accessible alternative)

Ontario's universities, colleges and school boards remain committed to providing accessible education and services for Ontarians to ensure a fully inclusive education system, as well as supporting the Ministry to achieve its goal of providing province-wide accessibility for Ontarians with disabilities by January 2025. We look forward to continuing to work with your government and stakeholders to advance this important work.

Yours sincerely,



Denis M. Chartrand  
Chair  
Association des conseils scolaires  
des écoles publiques de l'Ontario



Linda Franklin  
President and CEO  
Colleges Ontario



Steve Orsini  
President and CEO  
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Patrick J. Daly  
President  
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Cathy Abraham  
President  
Ontario Public School Boards' Association

cc. Jay Jung, Chief of Staff, Minister's Office, Ministry for Seniors and Accessibility  
Deputy Minister Carlene Alexander, Ministry for Seniors and Accessibility  
Matthew Varsava, Director of Policy, Ministry for Seniors and Accessibility  
(A) Assistant Deputy Minister Alison Drummond, Accessibility for Ontarians with Disabilities  
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