MIDDLESEX ACCESSIBILITY ADVISORY COMMITTEE

MONDAY, SEPTEMBER 23, 2019 11:00 AM
Middlesex County Building
399 Ridout Street North, London

AGENDA

Members Present:

Warden Kurtis Smith, Councillor John Brennan, Councillor Allan Mayhew, Michele Ivanouski, David Sitlington, Mary Jane Steele, Leslie-Anne Steeper-Doxtator, Kathy Bunting, County Clerk; and Sam McFarlane, Accessibility Coordinator

A.   CALL TO ORDER

1.   Provision for Disclosure of Pecuniary Interest and General Nature Thereof

2.   Minutes of the Middlesex Accessibility Advisory Committee meeting held on June 3, 2019
     A 2 - MAAC - MAAC Minutes - June 3, 2019

Moved by _____

Seconded by _____

That the minutes of the Middlesex Accessibility Advisory Committee meeting held on June 3, 2019 be approved as presented.

B.   ACTION ITEMS

1.   Taxicab Consultation
     B 1 - MAAC Action - September 23 - Taxicab Consultation
     •   Report from Sam McFarlane, Accessibility Coordinator
     Deferred from the June 3, 2019 meeting pending further information.
     Sam McFarlane will give a verbal update at the meeting

Moved by _____

Seconded by _____

THAT the Middlesex Accessibility Advisory Committee recommend to local Councils that if any municipality alters their existing taxicab licensing bylaw or has taxicab licensing added to their portfolio, that the new by-law (or the amendment of an existing one) consider adding a clause that 1 in every _____ taxicabs licensed by any municipality in the County must be accessible as defined in section 1 of Regulation 629 of the Revised Regulations of Ontario, 1990 (Vehicles for the Transportation of Physically Disabled Persons) made under the *Highway Traffic Act*. O. Reg. 191/11, s. 79 (4);
and THAT this document be forwarded to Middlesex County Council for information;

2.   Information and Communications Standard Review

B 2 - MAAC Action - September 23 - Information and Communications Standard Review

- Report from Sam McFarlane, Accessibility Coordinator

Moved by _____

Seconded by _____

That the Accessibility Coordinator file the Middlesex Accessibility Advisory Committee's comments on the proposed changes to the Information and Communication Standard with the Ministry for Seniors and Accessibility through both the survey feedback option, as well as the open ended feedback option.

C.   CORRESPONDENCE AND INFORMATION ITEMS

1.   2019 Compliance Reporting

C 1 - MAAC Info - September 23 - 2019 Compliance Reporting

- Report from Sam McFarlane, Accessibility Coordinator

Moved by _____

Seconded by _____

That the report be received for information.

D.   INQUIRIES

E.   NEW BUSINESS

F.   ADJOURNMENT

Moved by _____

Seconded by _____

That the meeting adjourn at p.m.

Accessible formats and communication supports are available upon request. Please contact Kathy Bunting, County Clerk to make a request. kbunting@middlesex.ca

MIDDLESEX ACCESSIBILITY ADVISORY COMMITTEE

Councillors Lounge, Middlesex County Building
Monday, June 3, 2019 at 11:00 a.m.

Members Present:
Warden Kurtis Smith, Councillor John Brennan, Councillor Allan Mayhew, Michele Ivanouski, David Sitlington, Leslie-Anne Steeper-Doxtator, Kathy Bunting, County Clerk; and Sam McFarlane, Accessibility Coordinator
Absent: Mary Jane Steele

A.   CALL TO ORDER

The County Clerk will Chair the meeting until the Chair has been elected

1.   Provision for Disclosure of Pecuniary Interest and General Nature Thereof
None.

2.   Election of Chair and Vice Chair

Moved by Warden Smith
Seconded by Councillor Mayhew
     That Councillor John Brennan be appointed Chair.
Carried.

Moved by Warden Smith
Seconded by Leslie-Anne Steeper-Doxtator
     That Councillor Allan Mayhew be appointed Vice Chair.
Carried.

3.   Minutes Minutes of the Middlesex Accessibility Advisory Committee meeting held on September 28, 2018

Moved by Councillor Mayhew
Seconded by David Sitlington
     That the minutes of the Middlesex Accessibility Advisory Committee meeting held on September 28, 2018 be approved as presented.
Carried.

4. Terms of Reference
A copy of the Middlesex Accessibility Advisory Committee Terms of Reference was reviewed with the committee.

Moved by Councillor Mayhew
Seconded by David Sitlington
That the Terms of Reference for the Middlesex Accessibility Advisory Committee be received as circulated.
Carried.

B.   ACTION ITEMS

1. Taxicab Consultation
   - Report from Sam McFarlane, Accessibility Coordinator

Moved by David Sitlington
Seconded by Councillor Mayhew
That this item be deferred until the next meeting pending more information.

2. On-Street Parking Consultation – Strathroy-Caradoc
   - Report from Sam McFarlane, Accessibility Coordinator

Moved by Dave Sitlington
Seconded by Councillor Mayhew
That the Middlesex Accessibility Advisory Committee provide support to the Municipality of Strathroy-Caradoc surrounding the placement of two on-street accessible parking spaces on Centre Street, adjacent to the Canada Post building; and that the committee supports the placement on each side on the entryway adjacent to the Canada Post building as outlined in graphic 1, it being noted that the on-street accessible parking space shall be painted with an accessible parking symbol and equipped with appropriate Rb-93 accessible parking signage; conditional on the entrance grade is satisfactory for wheelchair use.
Carried.

C.   CORRESPONDENCE AND INFORMATION ITEMS

1. County of Middlesex Joint Accessibility Plan 2016 to 2021

2. Annual Accessibility Status Report for 2018

3. Ontario Business Improvement Area Association (OBIAA) Accessible Main Street Advisory Committee Update
   - Report from Sam McFarlane, Accessibility Coordinator

4.   Trail Consultation Follow Up
- Report from Sam McFarlane, Accessibility Coordinator

Moved by David Sitlington
Seconded by Leslie-Anne Steeper-Doxtator
That Items C.1 – MAAC through C.4 – MAAC be received for information.
Carried.

D.   INQUIRIES

E.   NEW BUSINESS

F.   ADJOURNMENT

Moved by David Sitlington
Seconded by Leslie-Anne Steeper-Doxtator
That the meeting adjourn at 12:05 p.m.
Carried.

_____   _____
County Clerk – Kathleen Bunting   Chair - Councillor John Brennan

Middlesex Accessibility Advisory Committee

Meeting Date: **September 23, 2019 (deferred from the June 3, 2019 meeting)**

Submitted by: **Sam McFarlane, Accessibility Coordinator**

SUBJECT: **TAXICAB CONSULTATION**

BACKGROUND:

Municipalities are required to consult the public, people with disabilities and their Accessibility Advisory Committee to determine the proportion of on-demand accessible taxicabs required in the community. Further, any municipality that licenses taxicabs shall ensure that owners and operators of taxicabs are prohibited from charging a higher fare or an additional fee for persons with disabilities than for persons without disabilities for the same trip, and from charging a fee for the storage of mobility aids or mobility assistive devices. In addition, municipalities that license taxicabs shall ensure that owners and operators of taxicabs place vehicle registration and identification information on the rear bumper of the taxicab and make this information available in an accessible format to persons with disabilities.

ANALYSIS:

According to the Accessibility Coordinator's findings, in Middlesex County, Strathroy-Caradoc is the only municipality that licenses taxicabs. They have included all of the requirements listed above in their taxi licensing by-law. As an upper-tier Accessibility Advisory Committee, it is the MAAC's responsibility to consult on the proportion of on-demand accessible taxicabs required in the community. As only one of the lower-tier government's is responsible for licensing taxi-cabs, it is difficult for us to **require** a certain number of accessible taxicabs across the entire County with varying population demographics and densities. For reference, the Accessibility Coordinator compiled some information on how other municipalities are meeting these consultation requirements:

Brant County: taxi-cab licensing by-law: for every 3 taxicabs a company operates, 1 must be accessible. Licensing is done on a yearly basis. $120,000 transportation subsidized transportation program from Council

City of Thunder Bay: re-wrote their taxi-cab licensing by-law when it was placed back on the City's portfolio from Police Services Board. 1 in 10 taxis must be accessible

Town of Ajax: in an effort to encourage accessible taxi-cabs they offered accessible cabs free parking at their City Hall at any time

City of Ottawa: have a rural transportation system that falls under their Community Services umbrella – separate from the Para-transit system (specialized accessible transportation system)

All of this considered, all of these municipalities are either single tier governments or have a vast population density difference when compared to Middlesex County. It is of the Accessibility Coordinator's opinion that the legislation was geared more towards single tier, larger population centres. This makes it particularly difficult for Middlesex County to attempt to require taxicab companies to have accessible taxis on the road with generally small (or non-existent) fleets.

The Accessibility Coordinator reached out to other upper tier governments in Southwestern Ontario that share a similar population density and inquired about how they handle this same issue. Feedback was limited.

RECOMMENDATION:

THAT the Middlesex Accessibility Advisory Committee recommend to local Councils that if any municipality alters their existing taxicab licensing bylaw or has taxicab licensing added to their portfolio, that the new by-law (or the amendment of an existing one) consider adding a clause that 1 in every _____ taxicabs licensed by any municipality in the County must be accessible as defined in section 1 of Regulation 629 of the Revised Regulations of Ontario, 1990 (Vehicles for the Transportation of Physically Disabled Persons) made under the *Highway Traffic Act*. O. Reg. 191/11, s. 79 (4);

and THAT this document be forwarded to Middlesex County Council for information;

Middlesex Accessibility Advisory Committee

Meeting Date: **September 23, 2019**

Submitted by: **Sam McFarlane, Accessibility Coordinator**

SUBJECT: **INFORMATION AND COMMUNICATIONS STANDARD REVIEW**

BACKGROUND:

Accessibility Standards

The Accessibility Standards under the AODA are laws that businesses and organizations with one or more employees in Ontario must follow so they can identify, remove and prevent barriers faced by people with disabilities. These standards are part of the act's Integrated Accessibility Standards Regulation. Currently, there are five accessibility standards, and they apply to key areas of day-to-day life for Ontarians. These are:

- Information and communications

- Employment

- Transportation

- Design of Public spaces

- Customer Service

Standards Review Process

The act requires that each of Ontario's accessibility standards be reviewed within five years of becoming law, to determine whether they are working as intended and to allow for changes to be made if they are required. These reviews are carried out by Standards Development Committees. The Information and Communication Standard Review Committee is composed of 21 members, 17 of whom have voting power. Nine

members of the Committee are people with disabilities with the remaining members representing various fields the Information and Communication Standard impacts. The Committee has put forth 30 recommendations to the Minister of Seniors and Accessibility. The Minister may adopt the recommendations in an amended regulation in whole, in part, or with modifications.

Committee Approach
The standards deal with the way organizations create and share information and outline how they are to make information and communications accessible to people with disabilities. The standards require that accessible formats and communication supports be made available on request. They also cover such areas as emergency and public safety information, websites, feedback processes, as well as educational, training and library materials and resources and training for educators.

There was a reoccurring theme that the current standards are not keeping pace with technology. The Committee feels the current standard framework prevents innovation in accessible technology. Due to the rapid changes in technology, the Committee feels the standards need to be modernized.

The proposal from the Committee is split into two phases. Phase 1 contains 30 recommendations that the committee is proposing as immediate solutions to clearly identifiable gaps and unintended barriers in the current standards. Phase 2 proposes a new model to transform and modernize the regulatory approach to accessibility in Ontario. It could be applied first to the Info. Comm. Standard and would allow organizations to continuously adapt and improve their websites, web content and technology up to and beyond 2025. The committee has proposed that if successful, the Province look at adapting this model to other accessibility standards.

ANALYSIS:

Phase 1
Upon review of the 30 recommendations, a large number of them are simple, streamlined changes to clarify portions of the legislation that could be interpreted differently depending on the individual reading them. These recommendations will not be discussed by the Middlesex Accessibility Advisory Committee. The MAAC will review select recommendations that the Accessibility Coordinator felt was necessary to consult on.

Recommendation 5: Determination of suitability
If a person with a disability asks an organization for an alternate format or communications support, that organization is required to consult with the requester about the request. The final decision on whether to provide the requested alternate format or communications support is with the organization. The committee noted that

this is resulting in the provision of formats that do not meet the needs of people with disabilities.

The committee recommends to change regulation 12.(2) to state: "The obligated organization shall consult with the person making the request and gain **agreement** in determining the suitability of an accessible format or communication support."

The intent of this recommendation is that the final decision on the suitability of an accessible format should not be left to the organization alone. Rather, both the organization and the person requesting an alternate format should work together to gain agreement on suitability. The committee recognizes that this may create an impasse, and this is partly what motivates Recommendation 7.

Recommendation 7: Agreement between people with disabilities and organizations
Certain sections of the regulation require or provide for feedback processes allowing people with disabilities to make their needs and positions clear to organizations. Unfortunately, there is currently no mechanism to resolve disagreements when either party is unhappy with the result. Clearly, such a mechanism would be useful.

The committee recommends the following: The issue of a lack of mechanism to address disagreement between organizations and people with disabilities in any section of the regulation should be referred to the Accessibility Standards Advisory Council.

The intent of this recommendation is for the council to investigate the creation of a mechanism to support the satisfaction of both people with disabilities and organizations, in relation to requirements under the act and regulation. The council is best positioned to examine this issue.

Recommendation 14: Procurement
Procurement refers to the purchasing or acquiring of goods or services. The subcommittee noted that there are no accessible procurement requirements specifically related to Section 14 (websites and web content). There are procurement requirements in the general requirements section of the regulation, but the subcommittee suggested that these are not strong enough to result in accessible digital procurement.

The committee proposes the following: The Government of Ontario and designated public sector organizations shall incorporate accessibility design, criteria and features when procuring or buying goods, services or facilities. These criteria include:

- using qualified third-party evaluation certification services established through programs such as:
    - the U.S. Access Board Trusted Tester Program

- inclusive design or accessibility certificate programs such as those offered by colleges or universities

- professional certifications from organizations such as the International Association of Accessibility Professionals (IAAP)

- other professional service vendors that may qualify for such activities

- both manual and automated verification of compliance to technical web and software criteria, not just automated testing

- functional testing of usability by persons with disabilities

- interoperability with alternative access systems (as defined in the glossary)

- sign language and other communication modalities

- the requirement to procure accessible authoring and development tools

Recommendation 15: Differentiating organizations/ high impact organizations
The obligations of organizations under the regulation are determined by how many employees they have, as this has traditionally been a measure of how much widespread impact they have. However, the subcommittee advised the committee that as technology evolves, the number of employees is no longer necessarily a good indicator of the impact organizations may have on Ontarians. The fact is that, increasingly, organizations with very few employees are able to provide a high level or volume of services and thus should be considered "high-impact organizations."

The committee proposes the following:

- Create a definition for 'high-impact' organizations. One such definition might be an organization that has one or more Ontario employees and meets either of the following criteria:

  - One million or more users in Ontario (free or paid)

  - $10 million or more in yearly global revenues

- These newly defined high-impact organizations would have to comply with the Information and Communications Standards and report under the act, and be subject to the same requirements as large organizations

- For businesses under federal instead of Ontario jurisdiction, or with no employees in Ontario, the province should engage in consultation with businesses and the federal government to determine and harmonize mechanisms to regulate them

Recommendation 16: Significant refresh
Currently, the requirements of Section 14 apply to organizations which either create new websites or significantly refresh existing websites. Stakeholder feedback and advice from the subcommittee suggested there is confusion about what 'significant refresh" means, as the term is subjective. In addition, the committee learned that since Section 14 requirements apply to websites that are new or significantly refreshed, some organizations are choosing to update their websites only a bit at a time, thus avoiding the requirements. This may actually result in reduced accessibility for users.

The committee proposes the following:

- Any content that is new or which an obligated organization changes, updates or adds to a website must meet the accessibility requirements of Section 14

- Furthermore, when content is added, changed or updated, it is recommended that organizations take the opportunity to make all content accessible

- The committee recommends that content should include all functions, interactions and 'branding' (look and feel) for a site. It is recommended that Section 14 include examples for the sake of clarity

Recommendation 17: Practicability
Section 14 contains an exemption for obligated organizations which gives them the ability to claim that making a website accessible is 'not practicable'. The committee feels that this term is too vague and might allow some organizations to avoid doing something they are actually able to do.

The committee proposes the following:
Clearly define the term "not practicable," bringing it in line with the term "undue hardship," as set out by the Ontario Human Rights Code.

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

Recommendation 20: Intranet exemption
Further to Recommendation 19, the committee believes that technology has advanced to the point where all organizations should be able to make their websites accessible under Section 14. Thus far, only the Government of Ontario and Legislative Assembly are required to do so. The subcommittee and committee do not believe there would be

a major issue with extending this requirement to the broader public sector and large organizations.

The committee proposes the following**:**

The exemption for employee-facing websites and content (previously referred to as intranets) should be removed and, like all other websites, these types of websites should be required to comply with the regulation.

Recommendation 21: Pre-2012 exemption
Section 14 provides an exemption from having to make web content accessible if that content was first published on a website before 2012. The committee discussed that this exemption has created two problems. First, some organizations are using this exemption as a loophole that enables them to continue using some content from pre-2012 websites on new websites. The second problem is that organizations are taking useful pre-2012 content, such as historical records, off their websites when they move to a new or refreshed website because they do not have the resources to make this content accessible.

The committee proposes the following:

A category should be created for older archived content. A potential model for this would be the federal Treasury Board archived content policy. This would grant an exemption only to non-active documents. Active content, which is anything that requires input or, like forms, can be changed, will not be covered under this exemption. Pre-2012 images used for navigation in refreshed websites must be made accessible.

Recommendation 22: Live captioning and audio description
Currently, the Government of Ontario and Legislative Assembly are the only organizations which must meet the live captioning and audio description requirements in the Web Content Accessibility Guidelines (WCAG) 2.0. All other organizations are exempt from implementing this requirement.

The committee proposes the following:

- By 2025, the exemptions to the WCAG 2.0 guidelines regarding live captioning and audio descriptions should be removed.

- Between now and 2025, obligated organizations should put in place the infrastructure to support live captioning and audio description. Organizations which are currently exempt and are required to prepare a multi-year plan should include progress toward this infrastructure in their plan.

The intent of this recommendation is to have obligated organizations plan infrastructure, adopt training, and generally get ready to implement live captioning and audio descriptions by 2025, or sooner if the next committee should choose to accelerate the timeline. The committee's intention is to establish a high standard (equal to CRTC standards for live captioning) of quality in live captions.

Phase 2

Phase 2 of the recommendations introduces the **Accessibility Ecosystem Model**. This model is proposed first for digital content but its applications may be more broadly applicable to other standards. The proposed timeline is two years following the filing of these final recommendations (2021). The proposed ecosystem model is comprised of three independent parts: the Laws, the Trusted Authority and the Community Platform.

The Laws

This is the least flexible part. The Laws would establish requirements, but not specify how they must be met. The Laws include three types:

- Functional Accessibility Requirements (FARs). These are requirements that are constant. They do not mention specific technologies, to avoid a situation in which a technology changes and evolves to the point where the requirement no longer makes sense. If organizations need help understanding how to meet the requirements, they are linked to acceptable methods of doing so by the Trusted Authority. These requirements are modeled on and harmonized with requirements adopted by both the European Union and relevant US accessibility laws. The functional requirements do not replace technical requirements but specify what they are trying to achieve.

- Regulations regarding the policies of the ecosystem. These govern the Trusted Authority, the Community Platform and updates to the Laws.

- Regulations that support system-wide long-term changes and improvements in the accessibility of Ontario. These include:

    o integrating education about accessibility in all education, starting as early as K-12

    o integrating accessibility into professional training for all professions that have an impact on products and services

    o requiring accessibility when purchasing products and services, especially when spending public funds

    o including people with disabilities in decision making and planning processes, and ensuring that mechanisms for participation are accessible

Trusted Authority

The Trusted Authority would be an independent group that provides ongoing oversight and support to the system of accessibility standards, in order to ensure that the system is performing as it should and accomplishing what it is intended to accomplish. The Trusted Authority would include people with a wide range of expertise, including lived experience with disabilities.

As implied by the name, the Trusted Authority must be credible, understandable and reliable. All its activities must be transparent and open to public scrutiny. The Trusted Authority would have the power to consult with any individual or group to address knowledge and skill gaps.

The Trusted Authority would:

- Determine and provide clear up-to-date qualifying methods for meeting regulations. (The current set of qualifying methods includes the Web Content Accessibility Guidelines 2.0, the Authoring Tool Accessibility Guidelines 2.0 and other standards such as Electronic Publication (EPub) and International Organization for Standardization (ISO 24751).

- In addition to qualifying methods, ensure that necessary tools and resources are available to use the qualifying methods.

- Provide guidance regarding how to achieve the functional accessibility requirements, specific to the particular organizations. This includes links to resources and tools in the Community Platform.

- Retire qualifying methods that are out of date.

- Clarify laws when there is uncertainty or when there are changes.

- Review new and innovative methods proposed by organizations and individuals to determine whether they can be used to meet the requirements.

- Address gaps in available qualifying methods to meet the requirements.

- Ensure that the barriers experienced by all Ontarians with disabilities are addressed by regularly evaluating who might be falling through the cracks. This includes individuals with a range of technical literacy, individuals in urban, rural and remote communities, Ontarians at all income levels and individuals with disabilities that are not visible or episodic disabilities. It also includes people who experience other barriers that might worsen the barriers experienced due to disabilities.

- Provide, track and make publicly available indicators of progress toward an accessible Ontario. Examples of those indicators might include the number of companies with an accessibility officer, the number of accessibility complaints received and their resolution, the number of employees who self-identify as having a disability, and the number of Ontarians trained in accessibility skills.

- Prioritize accessibility processes and tools rather than specialized technologies and services for people with disabilities. In this way, people with disabilities do not have to bear the additional cost of buying their own specific technology.

- Support innovation that recognizes the diversity of needs experienced by people with disabilities rather than a "winner takes all" or a "one winning design" approach.

- Support recognition that people with disabilities must be designers, developers, producers and innovators, and not only consumers of information and communication.

- Qualifying methods must include accessible tools and processes.

The Trusted Authority would maintain an online interactive guide for participating organizations. This guide would let organizations know which FARs apply to them, what qualifying methods they could use to meet the requirements, and what tools and resources are available to help them implement the qualifying methods. The guide would be inclusively designed to consider the different types and ranges of expertise of organizations in Ontario.

It is recommended that the Trusted Authority report directly to the Legislative Assembly. It is the responsibility of the Legislative Assembly to maintain the FARs and the responsibility of the Trusted Authority to maintain the qualifying methods. Funding commitments for the Trusted Authority must span two political terms to ensure sustainability and independence. Decision-making regarding leadership of the Trusted Authority should be transparent and inclusive of Ontarians with disabilities.

Community Platform

The Community Platform would be an online platform, open to everyone in Ontario that provides a simple and clear way for community members to contribute their knowledge, expertise and constructive criticism about accessibility in this province.

The Community Platform would:

- collect and make accessibility resources and tools easily available

- share training and education

- make it possible for community members to monitor and review how organizations are doing in meeting the requirements

- empower communities to organize events and activities that support accessibility

- showcase and share good examples of accessible practices

- collect and showcase data on various economic and social aspects of disability

The Community Platform must be an open online infrastructure that is easy to get into, easy to use and easy to navigate. It would allow any community member to pool, share and review a large variety of resources that are helpful in implementing the qualifying methods. These resources might include training modules, software tools, evaluation tools, design tools, reusable software components, helpful example practices, examples of contract language for procurement contracts, examples of job description language and many other resources.

The platform would also provide a means for community members to constructively review the resources. Community members would be able to identify gaps in resources, and these gaps would be disseminated publicly to potential innovators and resource producers. The Community Platform will learn from similar initiatives to avoid the pitfalls involved in keeping resources up-to-date and usable by a large diversity of individuals and organizations. Financial support would be needed to maintain the infrastructure and keep the various resources relevant and up-to-date.

Compliance
Clearly, compliance will have to be an important part of any successful accessibility ecosystem. The question, then, is how do we enforce and ensure proper compliance? Before making a more definitive recommendation, the committee would like to ask the public for input on how compliance might work, informed by its discussion on this topic summarized below:

The committee had an in-depth discussion of how compliance might work in Phase 2. It was agreed that a reasoned, measured approach that rewards good actors and addresses bad behaviour is critical. In addition, greater accountability of leadership was a recurring theme. The committee also discussed greater connections between government bodies/ministries to enable government to be a better leader and using a greater spectrum of compliance measures. Some questions that came up were:

- What is the right way to focus on organizations that want to do this right and actively build models that work well?

- How do you evolve the current approach to compliance in order to encourage organizations to participate in this ecosystem, using a combination of both incentives and disincentives?
    - examples of incentives include grants, loans, tax benefits and public recognition of success
    - examples of disincentives include fines, levies to cover the cost of accessibility, surcharges and naming non-compliant organizations using social media
- How best do you highlight the benefits of proactively investing in the integration of emerging technologies? How should we define emerging technology?

RECOMMENDATION:

That the Accessibility Coordinator file the Middlesex Accessibility Advisory Committee's comments on the proposed changes to the Information and Communication Standard with the Ministry for Seniors and Accessibility through both the survey feedback option, as well as the open ended feedback option.

Middlesex Accessibility Advisory Committee

Meeting Date: **September 23, 2019**

Submitted by: **Sam McFarlane, Accessibility Coordinator**

SUBJECT: **2019 COMPLIANCE REPORTING**

BACKGROUND:

All Designated Public Sector Organizations in the Province of Ontario are required to file Accessibility Compliance Reports with the Ministry of Seniors and Accessibility by the end of 2019.

This includes Middlesex County as an upper tier government along with it's 8 local Municipalities. As of September 23, 2019, three of the eight local municipalities have already filed fully compliant reports to the Ministry.

Middlesex County, along with the remaining local Municipalities who have yet to report anticipate filing fully compliant reports, meeting our legislated requirements under the Accessibility for Ontarians with Disabilities Act.