

## PROCEDURE PR.566.GOV

TITLE: ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

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## 1.0 OBJECTIVE

To ensure the provision of accessible formats and communication supports for print and media materials to persons with disabilities.

### 2.0 DEFINITIONS

In this procedure,

- 2.1 Accessible format means a medium and/or methodology that allows access to information in a manner other than how the format was originally delivered. These may include, but are not limited to, structured electronic documents (outlined in Attachment 1), large print, recorded audio and electronic formats, braille and other formats used by persons with disabilities.
- 2.2 **Accessibility** means creating an environment in which systemic barriers to the full participation of people with disabilities are reduced or eliminated through reasonable efforts so that there is equitable access for all (i.e., services, systems, and policies)
- 2.3 **Assistive Device** means any device used by people with disabilities to help with daily living. Assistive devices include a range of products such as wheelchairs, walkers, white canes, oxygen tanks, and electronic communication devices.
- 2.4 **Communication** means the interaction between two or more persons or entities, where information is provided, sent, received and understood
- 2.5 Communication Supports mean tools to facilitate effective communication with persons with disabilities. These may include, but are not limited to, plain language, sign language interpreter, reading the information out loud to a person with vision loss, adding captioning to videos or using written notes to communicate with someone who is hard of hearing.

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- 2.6 **Community** means students, parents/guardians, trustees, staff, and volunteers of a school and feeder schools/family of schools as well as the community of people in businesses and organizations that are served by the District.
- 2.7 **Conversion-ready Format** means electronic or digital formats that facilitate conversion of information into an accessible format.
- 2.8 **Disability** means,
  - a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
  - b) a condition of mental impairment or a developmental disability;
  - c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
  - d) a mental disorder; or
  - e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997.* 
    - The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.
- 2.9 **Information** means data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.
- 2.10 **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. A new internet website means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.
- 2.11 **Unconvertible Information or Communication** means information or communication that it is not technically feasible to convert or when the technology to convert the information or communication is not readily available.
- 2.12 **Web Content Accessibility Guidelines 2.0 (WCAG)**, dated December 2008, means an international standard for making content accessible, primarily for persons with disabilities.
- 2.13 **Web Content** includes, but is not limited to all static or dynamically generated information including text, images, audio and video, that is available electronically and posted to a District or school internet website. It includes content that may have been designed for another medium, such as print, but it is subsequently published online.

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## 3.0 RESPONSIBILITY

- 3.1 The Curriculum Services and Learning Support Services Departments will be responsible for:
  - ensuring that centrally prepared/planned learning resources and material are available in an accessible format.
- 3.2 The Communications Department will be responsible for
  - coordinating requests for accessible formats and communication supports for central departments and acting as a resource for schools dealing with schoolbased requests; and
  - b) ensuring that information about the availability of accessible formats and communication supports is posted on the District's website
- 3.3 The Purchasing Division will be responsible for:
  - a) ensuring that accessibility design, criteria and features will be incorporated when procuring or acquiring goods, services or facilities.
- 3.4 Superintendents and principals will be responsible for:
  - coordinating requests for accessible formats and communication supports for the schools and central departments for which they have responsibility;
  - b) ensuring that staff are aware of the requirements and processes in place to deal with requests for accessible formats and communication supports; and
  - c) ensuring that information about the availability of accessible formats and communication supports is posted on the school's website.
  - d) ensuring that all District and school websites and web content conform with WCAG 2.0 guidelines as outlined in this procedure.
- 3.5 All employees will be responsible for:
  - a) understanding the requirements of the AODA and following the requirements of this procedure.

## 4.0 PROCEDURE

## Accessible Formats and Communication Supports

- 4.1 The District will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities.
- 4.2 Notice about the availability and process for requesting accessible formats will be posted on the District's website or other such methods as is reasonable in the circumstances.
- 4.3 Requests for accessible formats for District documents and communication supports will be directed to the Communications Department who will respond to the request.
- 4.4 Requests for an accessible formats or communication support for school-based documents or services will be directed to the school principal. The principal may consult with the Communications Department to accommodate the request.

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- 4.5 Upon receipt of a request, staff will consult with the applicant to determine a suitable accessible format or communication support that takes into account the person's accessibility needs.
- 4.6 The District will make every reasonable effort to provide accessible formats and communication supports in a timely manner. Wherever practicable, response time will be within 20 business days of receipt of a request. Providing a document in an accessible format, or the provision of a communication support, can vary depending on the media chosen, the size, complexity, quality of source documents, and the number of documents to be converted.
- 4.7 The provision of accessible formats and communication supports does not apply to the following:
  - a) products and product labels;
  - b) unconvertible information or communications; and
  - c) information that the District does not control directly or indirectly through a contractual relationship.
- 4.8 In the event the District is unable to meet the request for an accessible format or service the District will provide an explanation to the requester as to why the materials are unconvertible and provide a summary of the information or communication.

## Accessible Websites and Web Content

4.9 After 01 January 2014, any new District and school internet and intranet websites and web content on those sites will conform with the <a href="World Wide Web Consortium's Web Content Accessibility Guidelines">World Wide Web Consortium's Web Content Accessibility Guidelines</a>, 2008 (WCAG) 2.0 at Level A.

This section does not apply to third-party sites, services, or software of hosts over which the Board has no direct control or where it is not practicable to implement WCAG 2.0 Level A accessibility. If it is necessary to use third-party services or productions that do not meet WCAG accessibility guidelines, the District will, upon request, provide an explanation, and consult with the person with a disability to provide the web content in an alternative accessible format.

- 4.10 By 01 January 2021, all District and school internet websites and web content will conform with WCAG 2.0 Level AA.
- 4.11 Any web content published prior to 01 January 2012 is exempt from meeting WCAG 2.0 Level A and Level AA accessibility.

### Educational and Training Resources and Materials

- 4.12 The District will, upon request, provide learning resources or material in an accessible format that takes into account the accessibility needs of a person with a disability by:
  - procuring through purchase or obtaining by other means an accessible or conversion ready electronic format, where available, or
  - b) arranging for the provision of a comparable resource in an accessible or conversion ready electronic format if the education or training resources or materials cannot be procured, obtained by other means or converted into an accessible format.

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4.13 arranging for the provision of a comparable resource in an accessible or conversion ready electronic format if the education or training resources or materials cannot be procured, obtained by other means or converted into an accessible format.

## Libraries

- 4.14 The District will, by 01 January 2015, ensure that all school libraries will, upon request, provide, procure or acquire by other means an accessible or conversion-ready format of print resources or materials for a person with a disability. Print materials can include books, magazines, posters, journals, newspapers, and newspaper articles. Special collections, archival materials, rare books and donations are exempt.
- 4.15 The District will, by 01 January 2020, ensure that all school libraries will, upon request, provide, procure or acquire by other means an accessible or conversion-ready format of digital or multimedia resources or materials for a person with a disability. Digital or multimedia resources often combine text and audio and include films, videos, CDs, and DVDs.
- 4.16 When school libraries are not able to provide materials or parts of materials in an accessible or conversion-ready format because the information cannot be converted (i.e., a textbook with many detailed images) or if the technology does not exist to convert the images, the library must explain why it cannot provide the materials or parts of materials as requested, and provide a summary of the information that cannot be converted.

## Procuring or Acquiring Goods, Services or Facilities

4.17 The District will ensure that accessibility design, criteria and features will be incorporated when procuring or acquiring goods, services or facilities, except where it is not practicable to do so, in which case, an explanation will be provided.

### 5.0 APPENDICES

Attachment 1 - Standards for Structured Electronic Document Production

Attachment 2 - Web Content Accessibility Guidelines (WCAG) 2.0 Requirements

## 6.0 REFERENCE DOCUMENTS

Accessibility for Ontarians with Disabilities Act, 2005

Ontario Regulation 429/07 Accessibility Standards for Customer Service

Ontario Regulation 191/11 – Integrated Accessibility Standards

World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0 Level A, 2008.

Board Policy P.121.GOV: Accessibility

Board Procedure PR.666.GOV: Accessibility (Customer Service Standards)

Board Procedure PR.622.IT: Appropriate Use of Technology

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### STANDARDS FOR STRUCTURED ELECTRONIC DOCUMENT PRODUCTION

## 1.0 Layout:

- Use the accessibility features in Word to create document templates that incorporate style sheets, headings, lists, columns, links, images, tables, charts, page breaks, headers, footers and table of contents;
- Check for any accessibility issues using the Accessibility Checker feature in Microsoft Office;
- Body text should be left aligned or put into columns;
- Use bold sparingly;
- Only highlight a few words rather than a paragraph;
- Use the Alternative Text option in Word to describe images, photographs, logos, charts, tables, and maps; and
- Provide meaningful hyperlinks using descriptive writing rather than copied URL links.

# 2.0 Language:

- Use plain, clear language to meet the widest audience possible including people with low literacy skills, learning disabilities, cognitive disabilities and people whose first language is not English; and
- All technical terms and acronyms should be fully explained.

#### 3.0 Font:

- Use Arial 12 for content and Arial 14 for headings;
- Verdana may also be used for clarity;
- Some users with low vision may request up to 48 point font to read the information;
- Avoid using a stylized font;
- Don't use ALL CAPS; and
- Use the bold feature instead of underline or italic.

## 4.0 Text Content:

- Keep text layout clear, simple and consistent;
- Do not overlay text on images;

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- The contrast between the text and background should be as high as possible;
- All text should be the same orientation on the page;
- Space between columns of text should be large enough to be distinct; and
- Any information conveyed in colour or through images should be described.

## 5.0 Audio and Video Content:

- Audio and video content that is inserted into a document requires accessible controls and text equivalents (described video) to meet the needs of people who are deaf or hard of hearing; and
- Text equivalents can be overlaid as captioning or provided as a link to a second page with complete transcript.

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#### **Attachment 2**

# WEB CONTENT ACCESSIBILITY GUIDELINES (WCAG) 2.0 REQUIREMENTS

## **Quick Reference List**

Details on the following guidelines can be found at: http://www.w3.org/WAI/WCAG20/quickref/Overview.php#content-structure-separation

## **Level A Compliance**

The first, most basic level of accessibility compliance is called Level A. An example of a Level A accessibility feature on a web page is alternative text. Alternative text appears when your mouse hovers over an image. It's important to use appropriate text when describing an image so that screen reader technology can describe the image to a person with vision loss.

# **Level AA Compliance**

The second, more extensive level of accessibility compliance is called Level AA. An example of a Level AA accessibility feature on a web page is properly named headings and labels, which enable people using screen reader technology to scan through the information on a web page efficiently. To achieve Level AA compliance, a web page must satisfy all Level A and Level AA success criteria.

For example, to quickly identify what stories are on the home page of a newspaper, a screen reader can search just the headings for each story. Properly labeled headings allow the screen reader to tell when one article stops and the next begins. If this is not done, every individual article will be read as one story. Each header should be labeled with the news article's subject. This allows users to easily find the information they want.

### **Guidelines**

Success	Level A	Level AA (includes	Level AAA (includes
Criteria		Level A)	Level A and Level AA)
Text Alternatives	Provide text alternatives for any non-text content so that it can be changed into other forms people need (i.e., large print, braille, speech, symbols, or simpler language)		

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Success	Level A	Level AA (includes	Level AAA (includes
Criteria		Level A)	Level A and Level AA)
Time-based Media	Provide alternatives for time-based media that presents equivalent information for prerecorded audio and video content (i.e., captions and audio descriptions)	Provide alternatives for time-based media that presents equivalent information for live audio or video content (i.e., captions and audio descriptions)	Provide alternatives for time-based media that presents equivalent information for prerecorded content (i.e., sign language interpretation, extended audio description, media alternative, audio-only live)
Adaptable	Create content that can be presented in different ways without losing information or structure. (i.e., simpler layout, structured electronic documents, meaningful reading sequence)		
Distinguishable	Make it easier for users to see and hear content including separating foreground from background (i.e. use of colour, audio control)	Make it easier for users to see and hear content (i.e., minimum contrast ratio of 4.5.1, resizing text up to 200%, using text rather than images	Make it easier for users to see and hear content (i.e., enhanced contrast ratio of 7.1, low or no background audio for primarily speech or music, mechanism to change visual presentation of text including colour, width, alignment, line spacing, resizing, using images of text for pure decoration only
Keyboard Accessible	Make all functionality available from a keyboard to allow easy navigation by keyboard commands		All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes

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Success Criteria	Level A	Level AA (includes Level A)	Level AAA (includes Level A and Level AA)
Enough time	Provide users enough time to read and use content without unexpected changes in content or context that are a result of a time limit (i.e., mechanisms to adjust timing, pause, stop or hide)		Provide users enough time to read and use content (i.e., no timing, postpone or suppress interruptions, no loss of data after re- authenticating)
Seizures	Do not design content in a way that is known to cause seizures (i.e., three flashes per second or below or the flash is below the general flash and red flash thresholds)		Web pages do not contain anything that flashes more than three times in any one second period
Navigable	Provide ways to help users navigate, find content, and determine where they are (i.e. mechanism to bypass blocks of content that are repeated on multiple web pages, web pages have titles that describe topic or purpose, web pages can be navigated sequentially, purpose of each link can be determined by link text alone	More than one way available to locate a web page within a set of web pages.  Headings and labels describe topic or purpose.  Keyboard focus indicator is visible	Information about the user's location within a set of web pages is available.  Section headings are used to organize content

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Success	Laval A	Level AA (includes	Level AAA (includes
Criteria	Level A	Level A)	Level A and Level AA)
Readable	Make text content readable and understandable (i.e. default human language of web page can be programmatically determined)	Default human language of each passage or phrase in the content can be programmatically determined	Mechanism is available for identifying specific definitions of words or phrases used in an unusual or restricted way, including idioms and jargon, expanding abbreviations, providing supplemental content that does not require reading ability more advanced than the lower secondary education level, identifying specific pronunciation of words where meaning is ambiguous without knowing the pronunciation
Predictable	Make web pages appear and operate in predictable ways (i.e., don't initiate change of context when component receives focus)	Provide consistent navigation and identification of components with the same functionality	Changes of context are initiated by user request or a mechanism is available to turn off such changes
Input Assistance	Help users avoid and correct mistakes (i.e., error identification, provide labels or instructions)	If an input error is detected provide suggestions.  Provide error prevention mechanisms for legal, financial and data input	Provide context-sensitive help.  Provide error prevention for all pages that require users to submit information
Compatible	Maximize compatibility with current and future user agents, including assistive technologies		

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