

Time for Large Ontario Employers to Review their Multi-Year Accessibility Plans

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Effective January 1, 2014, private sector employers with 50 or more employees in Ontario had to have multi-year accessibility plans in place and posted on their websites. A multi-year accessibility plan must outline the employer's strategy for preventing and removing barriers faced by individuals with disabilities, and for meeting all of the requirements under the *Integrated Accessibility Standards*, Ontario Regulation 191/11 (the Regulation).

The Regulation requires employers to review and update their accessibility plans at least once every five years. That means that this year, five years after the requirement was put in place, large private sector employers are due to undertake a review of their multi-year accessibility plans. Next year, in 2020, employers will also have to file accessibility compliance reports by December 31, so it is important that the requirement to review and update their multi-year plans does not slip through the cracks. Key dates to comply with accessibility standards are available on the [Government of Ontario website](#).

Additional Accessibility Update

An Information and Communications Standards Development Committee (the Committee) has recently issued recommendations for updating and amending the Information and Communication Standards contained in the Regulation. The Committee is [now calling for feedback on these recommendations](#). All feedback must be submitted by September 27, 2019.

The Information and Communication Standards address requirements relating to the following areas:

- website accessibility;
- feedback processes;
- accessible formats and communication supports for individuals with disabilities;
- emergency procedures and plans;
- educational and training resources and materials;
- training to educators;

- production of educational or training material; and
- libraries (both education and training institution libraries and public libraries).

Other notable recommendations include:

- Organizations should be required to obtain agreement from individuals requesting communication supports or accessible formats about the specific support or format to be provided and the timeframe in which it is to be provided;
- The website standards should be broadened to include mobile applications;
- Additional accessibility design, criteria and features ought to be incorporated when procuring goods, services and facilities;
- Various exemptions from the website standards ought to be removed, including those currently exempting extranets and intranets and pre-2012 active content;
- Certification requirements of provincially regulated professions must include knowledge and application of accessibility and the prevention of attitudinal barriers; and
- A new category of “high-impact” organizations should be created to capture organizations that do not have many employees in Ontario, but have a widespread impact on Ontarians through services provided. These organizations would be subject to the same requirements as large organizations.

It remains to be seen what recommendations, if any, will actually be implemented through amendments to the Regulation, however, it is worthwhile for employers and service providers alike to review the recommended changes and to consider whether they have concerns arising out of their experiences with the Information and Communication Standards so far, or whether they have concerns about the recommendations that they want to raise through the Committee’s feedback process.

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