

Accessibility Information Toolkit for Libraries

v2.0 May 2014

Collaborate **Innovate** Deliver

OCUL Ontario Council of
University Libraries



Version history

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v1.0	November 2013	
v2.0	May 2014	<ul style="list-style-type: none">◆ Document formatting◆ Inactive web links fixed◆ Cited and additional references merged◆ Copyright statement revised◆ Typos and grammatical mistakes edited

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UNIVERSITY OF TORONTO
LIBRARIES



1 TABLE OF CONTENTS

1 TABLE OF CONTENTS	3
2 INTRODUCTION	4
2.1 Accessibility in the library context	4
2.2 Using the Accessibility Information Toolkit	5
2.3 AODA and the standards	5
3 PUBLIC SERVICES	8
3.1 Accessible communications	9
3.2 Supporting students with disabilities	19
3.3 Resources for educators on accessible teaching and learning	23
4 PROCUREMENT	27
4.1 Accessible procurement	28
4.2 Ebooks, ejournals, and databases	32
4.3 IT software, hardware, and services	38
4.4 Audio-visual materials	43
4.5 External contractors	50
4.6 Maps and data	53
4.7 Model license and contract language	56
5 LAW AND ADMINISTRATION	63
5.1 AODA and university libraries	64
5.2 Canadian copyright and accessibility	74
5.3 Legal framework: Canada and United States	79
6 APPENDIX	84
6.1 Acknowledgements	85
6.2 Resources	87

2 INTRODUCTION

2.1 Accessibility in the library context

The [Ontario Council of University Libraries \(OCUL\)](#) understands that library users have diverse needs and that it is the role of libraries as service providers to ensure that these needs are met. Through its collaborative strength, OCUL is committed to ensuring maximum accessibility to world-class library resources and services regardless of locations, references, and individual abilities. The value of building a collaborative service model that offers sustainable services to diverse user groups by virtue of being flexible and adaptable to change is an integral part of the ongoing discussions about the future of academic libraries in Ontario. Establishing an understanding on what “accessibility” means in the context of OCUL libraries, we can foster a community of natural curiosity and inclusivity, within our ever-diversifying communities. Jutta Treviranus, Director of the Inclusive Design Research Centre at the Ontario College of Art and Design University (OCAD U) encapsulates a future-forward understanding of what disability and accessibility mean in the context of the individual and their environment:

“... disability can be framed as a mismatch between the needs of the individual and the service, product or environment offered. It is therefore not a personal trait but a relative condition.

Keeping this framework in mind, accessibility can be defined as the ability of the system to match the needs of the individual. Whether a system is accessible is relative to the requirements, goal and context of each individual user. As an example, if all information in a class is delivered in audio form, a student who is blind may not be experiencing a disability, while the student who has difficulty understanding the language may be experiencing a disabling barrier.

This framing recognizes that disability is not one side of a binary but a multifaceted spectrum. Accessibility is also not a separate or segregated part of the design process but an integral part of design that affects all users.”

As libraries explore the concept of consumers taking on the role of producers, it is important to reconsider the role of these producer-consumers in the context of changing learning environments. Inviting library users to participate in the design of library spaces

allows them to have a more meaningful learning experience. It also provides library staff with insights on emerging user needs, keeping on top of trends and the ever-changing behaviours of information seekers. Universal design allows for this adaptability and customization by enabling library users to convert, adapt and repurpose various tools to help them interact with spaces, physical and virtual, in a more sophisticated way.

2.2 Using the Accessibility Information Toolkit

Ontario university libraries are acutely aware of our responsibilities for provision of service to users with disabilities as outlined in the [Accessibility for Ontarians with Disabilities Act, S.O. 2005, ch.11 \(AODA\)](#). Despite the static nature of the legislation itself, the dynamic, collaborative and innovative environment within the [Ontario Council of University Libraries \(OCUL\)](#) provides us with opportunities to surpass requirements outlined by the law and to develop innovative solutions for inclusion. The Accessibility Information Toolkit is a perfect illustration of just such an opportunity identified and pursued.

This toolkit is offered to the OCUL community as a useful resource, explaining institutional obligations under the AODA legislation and providing examples of “best practices” in the context of Ontario university libraries. The material in this Toolkit should be considered in the context of each institution and adapted accordingly. Excerpts can be adopted, revised or incorporated into institutional guides, policies or any other supporting documentation.

The Toolkit is divided into three major sections that can be used together or independently:

3 PUBLIC SERVICES

4 PROCUREMENT

5 LAW AND ADMINISTRATION

This Toolkit is not legal advice. It has been created to help you understand the legislation and/or regulation and does not replace the official version of the AODA. If you require assistance in interpreting the legislation or the regulation, please contact your legal adviser. If there is any conflict between this toolkit and the AODA, the AODA is the final authority.

If you have any questions or feedback about the toolkit, email ocul@ocul.on.ca.

2.3 AODA and the standards

The [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#) aims to make Ontario accessible by 2025 through the development, implementation, and enforcement of

standards relating to 5 areas: customer service, employment, information and communications, transportation, and the built environment (buildings and outdoor spaces).

The AODA has two regulations, the [Accessibility Standards for Customer Service, O.Reg. 429/17 \(Customer Service Standard\)](#) and the [Integrated Accessibility Standards Regulation, O.Reg. 191/11 \(IASR\)](#). The IASR has four accessibility standards: Employment, Information and Communications, Transportation and the Design of Public Spaces. In addition to the requirements for larger public sector organizations, libraries of educational and training institutions also have additional obligations and compliance deadlines.

Under [Section 18](#) of the IASR, libraries of educational and training institutions that are obligated organizations shall provide, procure or acquire by other means an accessible conversion ready format of print, digital or multimedia resources or materials for a person with a disability, upon request. Special collections, archival materials, rare books and donations are exempt from these requirements.

Further information about compliance requirements under the Customer Service Standard and the IASR can be found in the [AODA and university libraries](#) section of this toolkit.

2.3.1 Compliance timeline

- ◆ **January 1, 2012**
 - Emergency procedure, plans or public safety information
- ◆ **January 1, 2013**
 - Educational and training resources and materials
 - Training to educators
 - Public libraries
- ◆ **January 1, 2014**
 - All new internet websites and web content on those sites going back to January 1, 2012 must conform with [Web Content Accessibility Guidelines \(WCAG\) 2.0](#) Level A
 - Accessible feedback processes
- ◆ **January 1, 2015**
 - Accessible formats and communication supports
 - Educational libraries - print-based resources
 - Producers of educational or training material - Textbooks

- ◆ **January 1, 2020**
 - Educational libraries - multi-media/digital resources
 - Producers of educational or training material - Supplementary print materials
- ◆ **January 1, 2021**
 - All internet websites and web content must conform with WCAG 2.0 Level AAA (excluding live captioning and audio description)

2.3.2 More information

For more detailed information on compliance dates and requirements and how they may apply to individual institutions, visit the [AODA Compliance Wizard](#) or call the ServiceOntario AODA Contact Centre at:

Toll-free: 1-866-515-2025

TTY: 416-325-3408 / **Toll-free:** 1-800-268-7095

Fax: 416-325-3407

For more resources on understanding and complying with accessibility standards, visit the Accessibility Directorate of Ontario's [AccessON](#).

3 PUBLIC SERVICES

3.1 Accessible communications

3.2 Supporting students with disabilities

3.3 Resources for educators on accessible teaching and learning

3.1 Accessible communications

[3.1.1 What is “accessible communication”?](#)

[3.1.2 What types of library communications should be made accessible?](#)

[3.1.3 Interpersonal communications](#)

[In-person communications](#)

[Email and phone correspondence](#)

[Virtual reference](#)

[3.1.4 Print and written communications](#)

[Resources for creating accessible documents](#)

[3.1.5 Online communications](#)

[Best practices for online communications](#)

[Making websites accessible](#)

[Making videos and guided tutorials accessible](#)

3.1.1 What is “accessible communication”?

Accessible communication benefits all audiences by making information clear, direct and easy to understand. It takes into consideration the various barriers to accessing information, and provides opportunities for feedback.

Libraries communicate with users in a variety of ways, including in person, through printed materials, and via online spaces such as websites and social media. Providing clear and concise information, targeted to a particular audience, is important to ensure that all users have equal access to information. Although the vehicle for this information may change, the message is the same.

This section presents best practices for making communications accessible. Many of these techniques apply to multiple ways of communicating. For example, plain language is not only important when writing content for the web and printed materials, it is also important when speaking directly to library users.

The [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#) requires organizations to comply with standards to create an inclusive and accessible environment for all Ontarians. [Part II: Information and Communications Standards](#) of the [Integrated Accessibility Standards Regulation \(IASR\)](#) is particularly helpful to libraries in making their information accessible for people with disabilities.

Of particular relevance to this section is the [Accessibility Standards for Customer Service \(Customer Service Standard\)](#). To read more about the requirements and how this standard applies to Ontario’s university libraries, please refer to the [Customer Service Standard](#) section of this toolkit.

The following two resources also provide outstanding general information and tools about the Customer Service Standard, including compliance best practices:

- ◆ Communication Canada’s [Successful Communication Toolkit: Literacy and You \(PDF\)](#), released in 2003, provides an overview of straightforward communications practices in a variety of formats, and identifies some of the common barriers to good communication.
- ◆ Council of Ontario Universities (COU)’s [Accessible Campus Reference Library](#) provides tools, resources and adaptable templates to help Ontario universities comply with the AODA requirements.

3.1.2 What types of library communications should be made accessible?

Libraries should aim to have all communications be accessible, including:

- ◆ Interpersonal communications
- ◆ Public documents
- ◆ Websites and online tools and/or services
- ◆ Event invitations and session registration
- ◆ Presentations
- ◆ Videos
- ◆ Guided tutorials
- ◆ Online tests and surveys
- ◆ Online Learning Management Systems
- ◆ Billing and receipts
- ◆ Telephone services
- ◆ Social media

3.1.3 Interpersonal communications

Interpersonal communications comprise a significant amount of daily work of the public services staff. In-person queries, emails, virtual reference and phone consultations should all be approached with careful consideration of your audience and their specific needs. A library user might not always be clear about their needs, and these may not always be immediately obvious. In this case listening and asking for clarification can be important to ensuring good communication. This can be more complicated when communicating via emails or even the telephone, where it's not as easy to read the library user's body language.

Council of Ontario Universities (COU)'s [Customer Service Online Training Tool](#) and the Ontario Public Library Association (OPLA)'s [Accessible Library Services for Persons with Disabilities](#) webpage are both very useful resources for identifying and developing good interpersonal communications in the university and library context.

The University of Waterloo Library has also published a useful [AODA Toolkit: Customer Service Standard](#). This covers best practices related to the Customer Service Standard,

including public documents, invitations, presentations, online events, surveys, billing, telephone and other interpersonal communications.

The following is a list of best practices that may help public services library staff in their roles.

In-person communications

- ◆ Avoid making assumptions about the person you are interacting with.
- ◆ Be patient and take time to understand the needs of the person you are interacting with. If you are not sure what they need, or if you need clarification, just ask.
- ◆ Speak directly to the person you are addressing, even if they have an interpreter present.
- ◆ Respect the personal space of the person you are interacting with. This may include assistive devices such as wheelchairs.
- ◆ Keep a pen and paper at your desk. These tools will come in handy when communicating with a library user who might be hard of hearing or has a difficulty with directional instructions. Be flexible and open to supporting your user's needs.
- ◆ Be sensitive to the body language of the person you are interacting with.
- ◆ Be aware of available campus support services and where to direct someone if they seem upset or disoriented.
- ◆ Be aware of when the library patron has reached their information saturation point. Too much specific information can be difficult and overwhelming. Know how to distill information into a few very direct and specific points that are easy to remember.
- ◆ Explain things in a simple and accessible language. Language can pose a barrier for library users with learning disabilities or those who have English as their second language. Please avoid using complex terminology or "library speak."

Email and phone correspondence

- ◆ If your user self-identifies as having a disability and is seeking assistance accessing library resources, ask them if they are registered with Accessibility Services on campus. It's important to ensure that the student is aware of this service and has taken full advantage of the accommodation available to him/her.
- ◆ Develop a practice of emphasizing the flexibility of library services to accommodate all users.

- ◆ Stress the importance of user feedback. Ensuring and encouraging open feedback channels is an obligation under [Section 11](#) of the IASR, and library users are more likely to provide feedback if opportunities for feedback are readily available and encouraged.
- ◆ Ensure that your email signature is not an image file since these files are not accessible for screen reader users.
- ◆ Ensure that email correspondence should be prepared so that assistive technologies (such as screen readers, magnifiers, Braille displays and speech input systems) can access the text and present it to the user. HTML is the preferred default format.
- ◆ Consider your use of images. If they are images that convey meaning not addressed elsewhere in your email, consider providing a description.
- ◆ Incorporate accessibility language into your email signature, welcoming library users to communicate regarding their accommodation needs. Here is an example which you could borrow/adapt/revise to suit your needs:
 - “[name of your institution] strives to foster a learning environment of inclusivity and equal access to information resources and services. If you require unique accommodation due to your disability, please notify us and we will be happy to assist you ensuring that you experience a barrier-free learning environment. If you have suggestions about how we can improve, we welcome your input.”
- ◆ Accessibility Guides for individual software applications are becoming more readily available. If you regularly use a particular email application, see if they have provided guidelines on how to use their accessibility features.

Virtual reference

- ◆ Incorporating accessibility service training into your online interactions is a good start. An excellent resource on this topic is the Accessibility Directorate of Ontario (ADO)’s guide to the [Customer Service Standard](#).
- ◆ Communicate clearly and use plain and accessible language. For additional information about making your writing accessible, please consult the [Best practices for online communications](#) section of this toolkit.
- ◆ Highlight the different communication channels that are available to all library users.
- ◆ Be responsive to the user’s needs. Keep in mind that not all users might feel comfortable self-identifying as having a disability. It is up to the service provider to

assess what level and complexity of information should be communicated to each user.

- ◆ Be careful about directing library users to external resources that might not be fully accessible (such as maps or public websites).
- ◆ Wherever possible, make sure that your default font is a minimum 12 points without a serif to accommodate users who might experience eyestrain or who have low vision.
- ◆ Be prepared to answer questions about how users with disabilities are accommodated at your institution, what levels of accommodation are available to them and which services are responsible for this work.

3.1.4 Print and written communications

Resources for creating accessible documents

There are a number of guides available for creating accessible documents, including those specifically addressing various software applications such as Microsoft Office and the Adobe suite.

- ◆ [Accessible Digital Office Documents \(ADOD\) Project - OCAD University](#)
 - Developed by the Inclusive Design Research Centre at OCAD University in partnership with the Government of Ontario, this online resource provides a number of tip sheets to create accessible office documents with both proprietary and open source software.
- ◆ [Accessible Digital Documents & Websites - Accessible Campus, Council of Ontario Universities \(COU\)](#)
 - The Reference Library section of the COU's Accessible Campus website offers a series of tip sheets which provide simple guidelines concerning print documents, web accessibility, accessible formats, adaptive technology, and accessible PDFs.
- ◆ [Clear Print Standard - Canadian National Institution for the Blind \(CNIB\)](#)
 - The CNIB Clear Print Standard has identified ten simple design modifications to make your documents more accessible. These general guidelines may be used when creating both print and electronic materials.
- ◆ [Creating Accessible Microsoft Office Files - Microsoft Support](#)

- The Microsoft Office website offers a comprehensive set of online guides and video tutorials to help you make your Microsoft Word, Excel, and PowerPoint files more accessible.
- ◆ [Microsoft Office Accessibility Checker - Microsoft Support](#)
 - Similar to the Spelling and Grammar function found in most Microsoft Office applications, the Accessibility Checker inspects your document for potential accessibility issues and provides instructions on how to solve the problem(s) using built-in office tools.
- ◆ [Creating Accessible Adobe PDF Files - Adobe Systems Inc. \(PDF\)](#)
 - Adobe Systems Inc. has produced a step-by-step guide to converting new and existing documents to accessible PDFs. It covers a wide range of functions, including guides on creating accessible PDF documents from Microsoft Office applications, existing PDF documents, and scanned documents, as well as creating accessible PDF forms.

3.1.5 Online communications

The following guidelines apply to a variety of online and interactive forms of communication used in academic libraries.

Best practices for online communications

Language use

- ◆ Write in a concise and simple style to ensure users understand content quickly and completely
- ◆ Avoid jargon
- ◆ Explain all acronyms
- ◆ Use short sentences

Reading level

- ◆ Write general communication at a grade 7-8 reading level
- ◆ Write specialized information intended for an informed audience at a grade 10+ reading level

- ◆ Use forward looking and confident language, for instance, “We are planning an open house for new students in September” instead of “An open house for new students will be planned for September”
- ◆ Give your audience direction on what to do once they have heard/read your message
- ◆ Use active and descriptive headlines, email subject lines, and social media messages.

Format

- ◆ Use an easy to navigate layout that shows connections between ideas
- ◆ Prioritize essential information
- ◆ Use headings, subheadings, and bulleted lists to make content scannable (where appropriate)
- ◆ Use links to provide more information. Make sure these links are explicit in terms of where they are directing the user (avoid using language like “find it here”)
- ◆ Use enough white space to ensure information is not visually overwhelming and the most important information is highlighted

Type

- ◆ Vary use of multimedia and text to reach different types of learners
- ◆ Always use descriptive language tags (known as alt tags) for digital images

Feedback

- ◆ Offer feedback options via multiple channels
- ◆ Ensure appropriate resources are available to respond to feedback in a timely manner
- ◆ Use enough white space to ensure information is not visually overwhelming and the most important information is highlighted

For more information please refer to the [Accessible Digital Documents & Websites](#) section of the Council of Ontario Universities (COU)’s Accessible Campus website.

Making websites accessible

Websites are created using a wide range of programs and techniques. Regardless of the editor or content management system you use, the accessibility guidelines are the same.

For example, writing accessible content applies whether you are updating your website on an existing system or manually coding a website; appropriate colour contrast between background and font is the same regardless of the tool or editor used.

Compliance timeline

All institutions have the following requirements and compliance dates:

- ◆ **January 1, 2014**
 - New internet websites and web content on those sites must conform with the [Web Content Accessibility Guidelines \(WCAG\) 2.0](#) Level A.
- ◆ **January 1, 2021**
 - All internet websites and web content must conform with WCAG 2.0 Level AA, other than:
 - Success criteria 1.2.4 Captions (Live)
 - Success criteria 1.2.5 Audio Descriptions (Pre-recorded)

For more information, refer to [Section 14](#) of the IASR, and [Section 14](#) of the Accessibility Directorate of Ontario (ADO)'s [Guide to the IASR](#).

Web Content Accessibility Guidelines (WCAG) 2.0

- ◆ [Web Content Accessibility Guidelines \(WCAG\) 2.0](#)
 - WCAG 2.0 is an international standard for making web content accessible, developed by the World Wide Web Consortium (W3C).
- ◆ [W3C's Quick Reference to WCAG 2.0](#)
 - This quick reference guide from the W3C offers an explanation of what these guidelines are and how to meet them.
- ◆ [Stamford Interactive's WCAG 2.0 Requirement Map \(PDF\)](#)
 - This chart outlines different accessibility principles which need to be kept in mind when designing a new website or improving your current website.
- ◆ [Web Accessibility in Mind \(WebAIM\)'s WCAG 2.0 Checklist](#)
 - This website provides a simple checklist with recommendations for implementing HTML-related principles and techniques. The WCAG guideline is explained in plain language and examples on how to implement guidelines are provided. For example, a guideline is “use appropriate alt text;” WebAIM

will explain how to compose alt text for different situations because the situation determines what is appropriate.

Making LibGuides accessible

University of Waterloo Library [LibGuides for Guide Authors - Usability & Content](#) offers useful tips for writing for the web and accessible writing for LibGuides.

The [Staff Guide to LibGuides - Accessibility Tips](#) from the Syracuse University Libraries offers a list of accessibility tips to consider while designing your LibGuide, in accordance with WCAG 2.0.

Making LibAnswers accessible

LibAnswers is increasingly used by academic universities as it combines LibChat real-time chat service with email reference and SMS messaging to assist with library queries.

Making LibAnswers accessible means adhering to the general accessibility principles applicable to web design. Refer to [Best practices for online communications](#).

Making videos and guided tutorials accessible

[The Inclusive Library: Empowering Users with Accessible Tutorials \(PDF\)](#) created by Corinne Abba, Christina Kim, and Corrie Playford offers useful tips on making accessible tutorials, considering how accessibility needs to be incorporated throughout the entire design. Some sample tips include:

- ◆ Use large font
- ◆ Consider timing and pauses
- ◆ Consider appropriateness of language
- ◆ Keep tutorials short
- ◆ Provide an audio transcript
- ◆ Test your product before making it widely available. (Use a test group comprised of diverse members of the user community).

For more information on creating accessible audio-visual materials, refer to the section of this toolkit on the procurement of [Audio-visual materials](#).

3.2 Supporting students with disabilities

3.2.1 Introduction

3.2.2 What common barriers do students with disabilities face at post-secondary institutions in Ontario?

3.2.3 How do students with disabilities receive accommodation at OCUL institutions?

3.2.4 What types of accommodation are available to users with disabilities at OCUL institutions?

3.2.5 What are accessible texts?

3.2.6 How does accessible text accommodation work across OCUL institutions?

3.2.7 Do we need to create separate service models for users with disabilities?

3.2.8 What feedback channels should be made available to students with disabilities?

3.2.1 Introduction

The following section is designed to familiarize public services library staff with some of the challenges and barriers faced by students with disabilities at post-secondary institutions. It is our responsibility to be aware of these barriers and to assist students in overcoming them within our institutions.

3.2.2 What common barriers do students with disabilities face at post-secondary institutions in Ontario?

There are many challenges which new students face when entering studies at post-secondary institutions. Knowing where and how to obtain information about the available services and support systems can be a steep learning curve, especially for those users who experience additional daily barriers. Ensuring that information about diverse services is well promoted through a variety of channels is essential to making a student's journey through the university less complicated. Understanding user experience is key to knowing what, how and when services should be made available.

Library accessibility services can be promoted to students with disabilities through a variety of channels and accessible to all students, especially to those with a disability. Make sure that you are familiar with these associations/support groups at your institution and that your library takes full advantage of the supports which are available through these channels.

3.2.3 How do students with disabilities receive accommodation at OCUL institutions?

The current process of accommodation for students with disabilities is driven by self-identification. This necessitates that the student is aware that they are experiencing one or several learning barrier(s) and are aware of the causes (for instance, have medical paperwork to support their disability claim). If this is the case, the student can make an appointment with a disability counselor at their home institution, scheduling a time to talk about their medical history and to provide the required supporting paperwork.

3.2.4 What types of accommodation are available to users with disabilities at OCUL institutions?

Once students satisfy the paperwork requirements and discuss what desired accommodation can be arranged with their counselor, they may then take advantage of a

variety of services available to them at their institution. These services can include note taking, quiet study or exam areas, assistance with bursary applications to purchase assistive technologies, and the ability to request that reading material be made into accessible formats. Public services staff are encouraged to familiarize themselves with the services available to students on campus and which departments are responsible for what type of support work. In most cases there are a variety of services available to users with disabilities such as centres for students with disabilities, health and mental wellness services, library accessibility departments and others.

3.2.5 What are accessible texts?

Library users with disabilities can request a variety of accessible formats ranging from Microsoft Word to PDF and MP3 formats. This choice is dependent on the user's study preferences as well as the assistive technologies they use.

Many PDFs have Optical Character Recognition (OCR), which permits users with a screen reader to access content freely. This means that the text on the screen is "selectable." There are varying levels of accessibility even for an OCR'd PDF. If a document contains images, graphs, tables or any other visual information, these visual elements need to be "tagged." This means that each image is manually given alternative text or "alt text" which describes an image in words so that a screen reader can relate it to the user.

For additional information about accessible PDFs, please refer to the World Wide Web Consortium (W3C)'s [PDF Techniques for WCAG 2.0](#).

3.2.6 How does accessible text accommodation work across OCUL institutions?

The production of accessible texts varies from one institution to the next depending on the resources available. Accessible texts are generally produced or sourced through:

- ◆ the Accessibility Services office, which is responsible for counseling students
- ◆ the library via the library accessibility services office
- ◆ the collaborative efforts of both departments

It is advisable that staff in public services be aware of these services at their institutions.

3.2.7 Do we need to create separate service models for users with disabilities?

Library public service staff need to offer all users diverse options for taking advantage of the services available. Community members need to be well informed about these options and should have the opportunity to choose the type of service they would prefer and the method that best meets their needs. Acquiring expertise in the area of accessibility enables service providers to gain a better understanding of the barriers that all library users can sometimes encounter.

3.2.8 What feedback channels should be made available to students with disabilities?

Under [Section 11: Feedback](#) of the Integrated Accessibility Standards Regulation (IASR), obligated organizations with a process for receiving and providing feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request. Further, obligated organizations are required to notify the public about the availability of accessible formats and communication supports. By increasing the access points to feedback opportunities, more students are likely to take advantage of providing their input, thus helping the library staff to continue improving these services.

Please refer to the following examples for accessibility feedback templates:

- ◆ [Queen's University: Customer Services – Accessibility Feedback](#)
- ◆ [University of Ottawa Heart Institute: Accessibility Feedback Form](#)

3.3 Resources for educators on accessible teaching and learning

[3.3.1 Introduction](#)

[3.3.2 What are the best practices for promoting accessibility awareness to educators?](#)

[3.3.3 What can educators do in order to make their learning materials accessible?](#)

[Course readings](#)

[Accessible assignments](#)

[Institutional repositories](#)

[Learning Management Systems \(LMS\)](#)

[3.3.4 How can educators promote accessibility resources to their students?](#)

[3.3.5 What additional resources are available to educators?](#)

3.3.1 Introduction

The [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#) affects all aspects of serving users with disabilities in OCUL institutions. This includes in-person and online interactions, making both services and collections fully accessible and promoting the value of building an inclusive learning environment to support all library users. The following section outlines best practices to help educators comply with the accessibility requirements under AODA.

3.3.2 What are the best practices for promoting accessibility awareness to educators?

New Staff Orientation or Welcome to Your Library events can present a great opportunity for library staff to introduce new faculty members, sessional instructors, teaching assistants and new reference librarians to the AODA requirements and accessibility criteria as outlined by your institution. Consider asking key accessibility liaison staff to attend this event in order to share their expertise with incoming staff as well as to establish a personal dialogue that could grow into a dynamic relationship of information sharing. Library staff whose portfolios include information literacy and teaching should be aware of how to make their materials accessible.

The [York University Faculty Awareness Guide](#) is designed to support educators in teaching students with disabilities. It is an excellent example of how information about student needs can be effectively communicated.

3.3.3 What can educators do in order to make their learning materials accessible?

Ensuring that educators are aware of the Integrated Accessibility Standards Regulation (IASR) [Section 12: Accessible formats and communication supports](#) is the first step in communicating your institutional requirements.

Consider creating a library page, which explains how and where accessible formats are created at your institution. Include any key accessibility liaison staff as contacts to assist with questions pertaining to creating accessible learning content.

The following examples from OCUL institutions provide information about how and where accessible formats can be requested:

- ◆ [Queen's University: What are Alternate Formats? \(large print, Braille, e-text, digital audio\)](#)

- ◆ [Ryerson University: Accessible format information \(for students, faculty, instructors and staff\)](#)
- ◆ [York University: Alternate format materials \(course materials, web sites, multimedia, tests/exams\)](#)

Course readings

It takes time to create course readings in accessible format and August through October is the peak time for production of alternate format readings. Raising awareness of the impact of speedy provision of course reading lists will assist in ensuring that students with disabilities are not disadvantaged by delays.

The [Creating Course Reading Lists Guide](#) produced by Queen's University Library, provides useful information about creating accessible course reading lists.

Accessible assignments

Incorporating the creation of accessible formats into daily practices can help educators to produce fully accessible resources from the beginning. Useful guides for creating accessible documents can be found in the previous sections.

Please refer to the [Resources for creating accessible documents](#) section of this toolkit.

Institutional repositories

When submitting scholarly documents to the institutional repository, scholars can be encouraged to consider making their publications accessible. Consider installing an Optical Character Recognition (OCR) tool, which could help the contributor to make a publisher file accessible before submitting it to the repository. Including "alt text" tags for images in an OCR'd PDF offers users the option to contribute image descriptions for tagging purposes.

Learning Management Systems (LMS)

Automatic notifications reminding educators to ensure that the material they are adding to courses should be made accessible could be used when loading materials onto an LMS or when submitting reading lists. These notifications could be accompanied by a quick link to the library guide on how to make course readings accessible or how to create accessible handouts. Consider all relevant access points to reach your audience.

3.3.4 How can educators promote accessibility resources to their students?

Educators should promote the availability of accessibility resources to their students at the start of the course. This information can be distributed through accessible handouts, an in-class presentation, a library orientation session or an email. The information should contain contact information for the disability, equity and mental health offices, and highlight what resources may be available through the library. This communication is essential in ensuring that students are well equipped and ready to cope with any accessibility challenges they are faced with in the school year.

3.3.5 What additional resources are available to educators?

The [Educators' Accessibility Resource \(EAR\) Kit](#) developed by the Council of Ontario Universities (COU) responds directly to the requirements in [Section 16: Training to educators](#) of the IASR, and includes information and tools to help educators create more inclusive learning environments.

The EAR Kit includes:

- ◆ [Course Planning](#)
- ◆ [Teaching Tips](#)
- ◆ [External Resources](#)

The University of Toronto's [Creating an Inclusive Course and Classroom](#) website also aims to meet the standards outlined in the AODA and identifies detailed, practical strategies for accessible and inclusive teaching.

The guide includes:

- ◆ [Syllabus Design and Course Information](#)
- ◆ [Course Design](#)
- ◆ [In-Class Teaching](#)
- ◆ [Inclusive Educational Technology](#)

The Council of Ontario Universities (COU)'s Accessible Campus guide to [IASR Section 16: Training to Educators](#) also provides a number of resources in meeting educational requirements for accessibility.

4 PROCUREMENT

- 4.1 Accessible procurement**
- 4.2 Ebooks, ejournals, and databases**
- 4.3 IT software, hardware, and services**
- 4.4 Audio-visual materials**
- 4.5 External contractors**
- 4.6 Maps and data**
- 4.7 Model license and contract language**

4.1 Accessible procurement

[4.1.1 What is accessible procurement?](#)

[4.1.2 What considerations need to be made when procuring materials for your library?](#)

[4.1.3 Vendors and the AODA](#)

[4.1.4 What can you do when accessible procurement is not possible?](#)

[4.1.5 What is required if a non-compliant resource must be purchased?](#)

[4.1.6 When do vendors have to make their products accessible?](#)

[4.1.7 Can vendors be required to take Accessible Customer Service Training?](#)

4.1.1 What is accessible procurement?

Accessible procurement involves determining what is required for a product or service to be accessible, and either finding ways to procure something that meets those requirements or, documenting why this is not possible and what will be done if an accessible alternative is requested. Drafting a checklist of procurement considerations and using assessment tools such as the ones identified in this toolkit can help staff determine how accessible a product is.

4.1.2 What considerations need to be made when procuring materials for your library?

Communicating the accessibility needs of your institution to vendors can help inform your understanding of whether more accessible formats might be made available to you in the future and whether the vendor you are negotiating with can meet your future needs. If you choose to procure non-accessible formats, it is important to carefully document this decision.

4.1.3 Vendors and the AODA

When negotiating with vendors who are not familiar with the [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#) requirements, it is helpful to be as specific as possible with regard to what your requirements are (and your obligations under [Section 18](#) of the IASR). It is important to be able to explain how your institution is expected to comply with these requirements, what measures have already been taken to comply with these requirements as well as what the potential penalties are for non-compliance.

Taking the time to understand the vendors' point of view on accessibility issues is also important. This information sharing is crucial in keeping your communication channels open and helping vendors understand where and how they can improve their product (if possible) to suit the requirements of your institution.

Incorporating accessibility language into procurement policy will ensure that these practices are observed in the future.

4.1.4 What can you do when accessible procurement is not possible?

Considerations will depend on what your library is looking to procure, however, documenting procurement decisions is important, especially as it relates to accessibility

compliance. This means that your institution is responsible for documenting why an accessible format may not have been an option, and will also help your department with vendor assessment when making future partnership/procurement decisions.

For additional information about accessible procurement, consult the [Making your purchases more accessible](#) guide produced by the Accessibility Directorate of Ontario.

4.1.5 What is required if a non-compliant resource must be purchased?

If a product does not meet the AODA standard:

- ◆ Document steps taken to identify alternative
- ◆ Document a plan for obtaining alternative if one is requested

4.1.6 When do vendors have to make their products accessible?

[Section 17: Producers of educational or training material](#) of the IASR states that:

- (1) Every obligated organization that is a producer of educational or training textbooks for educational or training institutions shall upon request make accessible or conversion ready versions of the textbooks available to the institutions.
- (2) Every obligated organization that is a producer of print-based educational or training supplementary learning resources for educational or training institutions shall upon request make accessible or conversion ready versions of the printed materials available to the institutions.
- (3) Obligated organizations to which this section applies shall meet the requirements of this section in accordance with the following schedule:
 1. In respect of accessible or conversion ready versions of textbooks, January 1, 2015.
 2. In respect of accessible or conversion ready versions of printed materials that are educational or training supplementary learning resources, January 1, 2020.

4.1.7 Can vendors be required to take Accessible Customer Service Training?

Under the Customer Service Standard, training must be given to everyone in your organization who deals with members of the public as well as other third parties who act on your behalf. This includes full-time, part-time and contract staff, volunteers and contractors. Therefore, it is up to your organization to decide which suppliers/vendors/key liaison individuals who regularly visit university campuses may be required to take the AODA training. This requirement can be communicated through the supplier assessment form (utilizing the assessment/ranking points system for new suppliers) or when a Request for Proposal (RFP) is issued. The supplier can be asked to demonstrate that they arranged for their employees to undergo customer service training.

For more information, refer to the [Sample policy language for accessible customer service training](#) section of this toolkit.

4.2 Ebooks, ejournals, and databases

[4.2.1 Introduction](#)

[4.2.2 What does the AODA Legislation say about library resources?](#)

[4.2.3 What is an accessible library resource?](#)

[Dresselhaus definition](#)

[OCUL model license definition](#)

[4.2.4 What kind of procurement decisions need to be made when purchasing?](#)

[4.2.5 Considerations when purchasing](#)

[Content specific considerations](#)

[Platform specific considerations](#)

[Additional considerations](#)

[4.2.6 What tools are helpful to evaluate the accessibility of journals, ebooks, and databases?](#)

[Tatomir Accessibility Checklist \(TAC\)](#)

[Human evaluators](#)

[Library vendors and the VPAT](#)

4.2.1 Introduction

This section includes information about [Accessibility for Ontarians with Disabilities Act, 2005, \(AODA\)](#) compliance for the purchase of library resources. The specific types of resources considered in this section include ebooks, ejournals and databases.

There are two challenges for libraries when procuring new resources. The first is evaluating the product, in terms of both content and platform, to determine what level of accessibility the vendor provides. The second challenge for libraries lies in ensuring that appropriate license terms are negotiated for every resource to ensure that material is either already available in an accessible format or may be converted to an accessible format if requested.

This section will provide information about how to evaluate resources in terms of accessibility and includes a checklist of considerations and links to additional websites with potentially helpful information.

4.2.2 What does the AODA Legislation say about library resources?

Under this section, the libraries of educational or training institutions that are obligated organizations shall provide, procure or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for persons with a disability, upon request. Special collections, archival materials, rare books and donations are exempt from this requirement.

[Section 18](#) of the AODA states that, when procuring resources, “Libraries of educational and training institutions” are expected to “provide, procure or acquire ... an accessible or conversion ready format ... upon request.” Academic libraries are expected to meet these requirements by January 1, 2015 for print-based resources or materials and January 1, 2020 for digital or multimedia resources or materials.

4.2.3 What is an accessible library resource?

Dresselhaus definition

In [The Americans with Disabilities Act \(2013\)](#), Angela Dresselhaus provided the following definition of an accessible library resource:

“Ability [of persons with visual, perceptual or physical disabilities] to obtain the same information, at the same time, for the same price and at the same quality [as persons with no disability].”

OCUL model license definition

The [Ontario Council of University Libraries \(OCUL\) Model License for Electronic Journals and Databases](#) includes the following definition of “Accessible Formats”:

“Accessible Formats” means content in a format that is perceivable and operable by persons with visual, perceptual or physical disabilities and be useable with assistive devices, such as screen readers and screen reading software. Such formats will comply with accessibility laws within Canada, including the Information and Communication Standards of Ontario Regulation 191/11 and the Accessibility for Ontarians with Disabilities Act, 2005 (as such laws may be amended from time to time). To address the requirements of such laws, web content must conform with the Web Content Accessibility Guidelines (WCAG 2.0), initially at Level A and increasing to Level AA to the extent required to comply with such laws.”

4.2.4 What kind of procurement decisions need to be made when purchasing?

- ◆ Determine what level of accessibility is required (or what level of inaccessibility will be tolerated). Tatomir and Durrance defined an inaccessible database as one that missed four or more of the ten Tatomir Accessibility Checklist (TAC) criteria (please refer to the [Tatomir Accessibility Checklist \(TAC\)](#) section below for more information).
- ◆ Decide if the interface or the content is not sufficiently accessible, is it available on another platform or could it be locally loaded on an accessible Scholars Portal platform.
- ◆ If neither an alternate platform nor local loading on Scholars Portal is an option, options should be considered for making the content accessible upon request. These options may include but are not limited to a conversion-ready accessible format provided by vendor or digitization of a print copy.

4.2.5 Considerations when purchasing

Both the content and the platform need to be fully accessible.

Content specific considerations

Consider the file format:

- ◆ Does the file format support adaptive technology or accessibility? And is the content available in multiple formats? (For example, file formats: EPUB3, TXT, HTML, PDF, DAISY (Digital Accessible Information System), MOBI)
- ◆ Are there Digital Rights Management (DRM) restrictions on a file that might limit accessibility?

Platform specific considerations

- ◆ Text equivalent for any graphical elements
- ◆ Keyboard navigation
- ◆ Proper labeling and use of headers
- ◆ Online electronic forms that are properly labeled and accessible
- ◆ Method to skip repetitive navigation links (all web pages should have a link which allows a user to skip directly to the main content, bypassing any site navigation information)
- ◆ Description of and instructions for accessibility features

Additional considerations

In [The Americans with Disabilities Act \(2013\)](#), Angela Dresselhaus identifies the following general considerations:

- ◆ Synchronized equivalent alternatives for multimedia (for instance, captioned video, transcripts of audio etc.)
- ◆ Colour should not be used as the only method for identifying elements of the web page or any data
- ◆ Screen flicker frequency (limit or eliminate the use of flickering, which can provoke seizures)
- ◆ Timed responses (if any page responses are timed, the user should be alerted and given the opportunity to indicate that more time is needed)

Additional considerations are listed in the [General guidelines for software](#) section of this toolkit.

4.2.6 What tools are helpful to evaluate the accessibility of journals, ebooks, and databases?

Tatomir Accessibility Checklist (TAC)

In the article [Overcoming the information gap \(2010\)](#), Jennifer Tatomir and Joan C. Durrance provide the following criteria:

1. Accessible versions of PDF web pages and documents.
2. Skip navigation and jump-to links.
3. Clearly labeled page elements.
4. Text captions for tables, images, graphics, graphs and charts.
5. Limited use of incompatible programming languages and scripts.
6. Absence of identically named page elements.
7. Text transcripts of videos, animations and podcasts.
8. Logical and consistent page organization.
9. Absence of timed responses.
10. Digital forms and functionalities accessible and usable with adaptive technologies.

Additional information can be found in [The Americans with Disabilities Act \(2013\)](#) by Angela Dresselhaus.

Human evaluators

- ◆ [Web Accessibility Evaluation Tool \(WAVE\)](#)
- ◆ [Photosensitive Epilepsy Analysis Tool \(PEAT\)](#)
 - A free, downloadable resource for developers that analyzes video clips to identify seizure risks in web content and software.
- ◆ [Voluntary Product Accessibility Template \(VPAT\) Form Version 1.3](#)
 - A template vendors can use to describe how their products meet accessibility guidelines.

Library vendors and the VPAT

To see a full list of vendors who have completed the [Voluntary Product Accessibility Template \(VPAT\)](#), please visit the [Vendor Accessibility Resource Centre \(VARC\)](#) produced

by the United States federal government. Library vendors who have completed the VPAT include:

- ◆ [CourseAvenue: Capabilities Statement](#)
- ◆ [CourseAvenue Studio: Authoring Tool for Section 508-compliant e-Learning](#)
- ◆ [EndNote: ADA Compliance](#)
- ◆ [HeinOnline: Section 508 Compliance](#)
- ◆ [Project MUSE: Accessibility and Section 508](#)
- ◆ [ProQuest: Accessibility](#)
- ◆ [ProQuest C19 Nineteenth Century Index: Accessibility](#)
- ◆ [ProQuest Chadwyck-Healey Literature Collections: Accessibility](#)
- ◆ [ProQuest Dialog: Section 508](#)
- ◆ [ProQuest Literature Online: Accessibility](#)
- ◆ [Reference Manager: Section 508 Compliance](#)
- ◆ [SurveyMonkey: Section 508 Compliancy](#)

4.3 IT software, hardware, and services

[4.3.1 Introduction](#)

[4.3.2 What are the AODA requirements with regard to Information Technology \(IT\)?](#)

[4.3.3 What makes these formats accessible?](#)

[General guidelines for software](#)

[General guidelines for hardware](#)

[4.3.4 What are some limitations that can affect procurement decisions?](#)

[4.3.5 Accessibility language for procurement](#)

4.3.1 Introduction

This section aims to assist with the procurement of Information Technology (IT) software, hardware, services and self-service kiosks as required by the [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#). The biggest challenge with the procurement of IT hardware is that accessible hardware may not yet be available. Procurement of software and services requires the review of existing features and requests for new features to ensure accessibility. This process may require collaboration between the vendor and the purchaser.

4.3.2 What are the AODA requirements with regard to Information Technology (IT)?

The following accessible IT requirements are listed under the Integrated Accessibility Standards Regulation (IASR):

- ◆ [Section 5: Procuring or acquiring goods, services or facilities](#)
 - Public sector organizations are required to incorporate accessibility requirements into their purchasing decisions.
- ◆ [Section 6: Self-service kiosks](#)
 - All other organizations must consider accessibility when designing or buying self-service kiosks.

For more information, see [Making your purchases more accessible](#) guide produced by the Accessibility Directorate of Ontario (ADO).

4.3.3 What makes these formats accessible?

General guidelines for software

- ◆ Interface accessibility via standard keyboard access methods and screen reader
- ◆ User access to the operating system accessibility tools, without affecting application functionality
- ◆ Compatibility with assistive technologies
- ◆ User-selected system settings for input and output
- ◆ Avoid the use of a pointing device
- ◆ All information is accessible to users with restricted or no vision, restricted or no hearing

- ◆ Screen flash frequency below 2 Hertz
- ◆ Instructions, prompts and outputs written in plain language, and, where possible, supplemented with pictorial information or spoken language
- ◆ Logical tab order for controls, input fields and other objects
- ◆ Instructions for all accessibility features
- ◆ Accessible documentation for training and support materials
- ◆ Availability of a forum or feedback channels
- ◆ Content management systems (CMS) are easy to manage by staff (accessibility fixes)

For additional information please refer to the United States National Center on Disability and Access to Education's [Tips and Tools: Content Management Systems & Accessibility](#). This checklist is intended to assist in the procurement of content management systems, with considerations developed for non-IT staff. This checklist is a part of the American legislation requirements. It is useful to the Ontario university libraries since it pertains to making information technology more accessible.

General guidelines for hardware

Printers / copiers

- ◆ The controls and keys are tactilely discernible on a touch screen
- ◆ The touch screen can be operated easily with one hand
- ◆ Voice output for a person who is unable to see a visual display
- ◆ Connectors for headsets to enable the user to operate the product in private
- ◆ User can interrupt, pause and restart the audio at any time using a variety of controls such as voice recognition or keyboard
- ◆ Colours depicted for colour choices have audio and visual descriptions
- ◆ Information cannot be conveyed through colour alone (For example, red means stop and green means go)
- ◆ User can manipulate colour and contrast of text and background settings
- ◆ No patterned backgrounds used behind text or important graphics
- ◆ Flashing/blinking can be disabled
- ◆ Accessible auditory and visual alternatives to flashing words
- ◆ Accessible height

Display devices (monitors and digital signage) and e-kiosks

The following information about Public Access Terminals has been borrowed from the [Centre for Excellence in Universal Design](#), established by the National Disability Authority of Ireland:

- ◆ Customization: users can adjust the colours and contrast
- ◆ Buttons can be operated by feel with one hand and minimal force
- ◆ Vendor instructions are available in accessible formats and plain language
- ◆ Screen flicker frequency below 2 Hertz
- ◆ Captioning of any audio/video content
- ◆ Height accessibility and easy access to controls
- ◆ All outputs are accessible to users with low or zero vision and hearing
- ◆ If using cards, ensure that the card can be inserted into the card reader in its correct orientation without requiring vision

Electronic readers

Apple's iPad and iBooks are highly accessible and popular among people with print disabilities.

The [E-reader Accessibility](#) website provides a list of suggested system requirements, which have been developed by IT Accessibility at the University of Illinois at Urbana-Champaign. Their list outlines the minimum, recommended and desirable features for operating e-reader devices as well as navigating ebooks. Although an American resource, this information is helpful to Ontario librarians in understanding how e-readers can be made more accessible.

LCD projectors and LCD or digital TV information screens

Any analog TV or DTV display or receiver must correctly receive and display closed captions that are transmitted by broadcast television, cable, videotape (for instance, VHS), or DVDs. This means that the product should accurately receive captions (turn on captions and play media known to have captions; verify the captions are available), open or closed caption decoding capabilities should be included in the product, and the product should display captions correctly.

For additional information please refer to the [Section 508 of the Amendment to the Rehabilitation Act \(1973\) checklist \(PDF\)](#). This checklist is a part of the American legislation requirements but may be helpful to the Ontario university libraries.

4.3.4 What are some limitations that can affect procurement decisions?

- ◆ availability of accessible goods, services or facilities
- ◆ technological compatibility between older products and newer ones being procured

When requested, an organization must provide an explanation as to why it did not incorporate accessibility criteria and features when procuring goods, services, or facilities. The explanation must be provided in an accessible format or with appropriate communications supports, if necessary. For more detailed information about the AODA requirements, please refer to the IASR, [Section 12: Accessible Formats and Communications Supports](#)

4.3.5 Accessibility language for procurement

The Ontario Public Service (OPS) Diversity Office has prepared the [Accessibility Language for Procurement Agreements \[PDF\]](#) document to support ministries in the development of procurement contracts, agreements and proposals to ensure accessibility and diversity considerations and requirements are embedded into the process. The suggested language incorporates actual excerpts from approved Request for Proposals (RFPs) that have been released to the public. Please use your judgment when applying or adapting the language to your specific procurement agreement/contract/proposal and ensure that current procurement processes and policies are followed.

4.4 Audio-visual materials

[4.4.1 Introduction](#)

[4.4.2 What are the AODA requirements regarding audio-visual materials?](#)

[Captioning](#)

[Transcripts](#)

[Audio description](#)

[Additional resources](#)

[4.4.3 What makes audio-visual materials accessible?](#)

[4.4.4 What kind of procurement decisions need to be made when purchasing audio-visual formats?](#)

[Procurement of services to make audio-visual materials accessible](#)

[Procurement of accessible audio-visual materials](#)

[4.4.5 How can I caption videos legally? Considerations when securing legal permissions](#)

4.4.1 Introduction

Audio-visual materials can include videos, audio files (podcasts, MP3s), training material such as guided tutorials and webinars, among others. The biggest accessibility challenge of this format is that the information that is conveyed through this medium is fully reliant on either audio or vision to convey the message. A person who has a visual impairment will not be able to absorb information conveyed through an image, just as a person who has a hearing impairment will not be able to access information conveyed through sound. This section offers the Toolkit users a better understanding with regard to institutional obligations for making audio-visual materials accessible under the [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#), highlighting best practices to help ensure that your library is able to meet these requirements.

4.4.2 What are the AODA requirements regarding audio-visual materials?

While the standards for accessibility of audio-visual materials outlined in the AODA's [Integrated Accessibility Standards Regulation \(IASR\)](#) can be interpreted in different ways, there are two accessible formats that the legislation explicitly requires: captioning and descriptive audio.

Material in e-reserves and learning management sites falls under the “intranet” definition in the IASR because it is usually secured behind authentication. If the audio-visual material is not intended for general public use (as on a public website), it qualifies as training material (see IASR, [Section 15](#) for details), and as such an accessible version can be provided upon request.

If the material is available publicly online, it falls under [Section 14](#) of the IASR, and institutions are obliged to provide this material in an accessible format, regardless of whether or not there is an explicit request for it.

Captioning

Including captions in video and multimedia communications increases accessibility for all users, especially users with varying hearing disabilities. There are two main types of captioning options: “closed” captions allow viewers the ability to turn the captions on or off, while “open” captions remain fixed to the video and are visible at all times. There is a commonly held belief that closed captions are preferable because having open captions can overwhelm some viewers (and could have an especially negative impact on those with cognitive processing challenges).

Subtitles vs. captions

Subtitles typically only transcribe into text the verbal/spoken portions of a video, while captions convey the significant sounds from a video as well. With captions the non-verbal information is usually displayed in square brackets, for instance, [sound of sirens and car horns], [instrumental music], [background music fades out].

The [Web Captioning Overview](#) from Web Accessibility in Mind (WebAIM) explains more information about captions (open and closed), audio descriptions and transcripts, as well as offers a list of terms of technologies related.

The Described and Captioned Media Program (DCMP) [Caption it Yourself](#) website offers instructions and guidelines for in-house captioning, as well as a list of web-based captioning tools, downloadable software, and caption-ready video hosting providers.

Online audio-visual files

Streaming media requires an online player that can turn captioning on or off. This requires a text-based file with an integrated timecode that the player understands and syncs with the video. There are several different formats for these captioning files.

- ◆ **.SRT**: Captions for YouTube, older JW FLV Player or for DVD subtitles longer than 32 characters per line
- ◆ **.VTT**: WebVTT format for HTML5 video
- ◆ **.DFXP.XML**: DFXP timed text for Flash with begin/end tags.
- ◆ **.QT.XML**: QuickTime TeXML subtitles. These are like QT.TXT but have a more modern UTF-8 character set support.

Transcripts

A transcript is a text-version of a video, which includes a meaningful description of all narration, dialogue, and sound effects. When captioning options are not available, attaching an accessible text based transcript document to the video might be possible.

For more information on best practices for creating web-based audio transcripts, visit [Transcripts on the Web: Getting People to Your Podcasts & Videos](#), produced by uiAccess.

Audio description

The Canadian Radio-television and Telecommunications Commission (CRTC) defines Audio Description as:

“...a narrated description of a program's main visual elements, such as settings, costumes, or body language. The description is added during pauses in dialogue, and enables people to form a mental picture of the program.”

This definition and other useful information can be found in the CRTC’s guide to [TV access for people with visual impairments](#). This guide explains why audio description and described videos are important and offers links to related projects and services.

Additional resources

- ◆ [National Center for Accessible Media \(NCAM\): Accessible Multimedia Guidelines](#)
- ◆ [World Wide Web Consortium \(W3C\): Multimedia Accessibility FAQ](#)

4.4.3 What makes audio-visual materials accessible?

Physical media may have captioning included with it. This requires a video player be available that will display the captioning. Described video (known to some as descriptive audio) is provided on request.

Audio-visual media are considered adequately accessible when:

- ◆ there are captions that can be displayed or activated easily by viewers (for publicly accessible online videos or audio files as per IASR, [Section 14](#))
- ◆ when a video includes a Described Video option (not necessary for audio-only files)

For compliance with Sections 15, 12 and 18 of the IASR, an audio track must be added to a video to convert it to a Described Video format when “notification of need is given.”

4.4.4 What kind of procurement decisions need to be made when purchasing audio-visual formats?

Currently libraries are only obliged to provide these upon request, but you should consider purchasing all media, as available, with existing captioning and descriptive audio. Having these formats readily available will enable libraries to meet accommodation requests in a more efficient and timely manner.

Physical media (for example, DVDs in your circulating collections) should have the capability to at least enable captioning to appear or have it embedded. It would also be beneficial if this material came with descriptive audio or at least a transcript.

Streaming media should come with a captioning file, descriptive audio or at minimum a transcript.

Descriptive audio is an interesting case as it can change depending on the educational purpose of the video. For example, for a film studies course, descriptive audio for the movie *King Kong* could be very different than for a women's studies course. The context of the use of the video will best determine how to create the descriptive audio.

Procurement of services to make audio-visual materials accessible

It might not always be possible for libraries to acquire captioned audio-visual formats. In these cases, external services may be required in order to provide accessible formats upon request.

Considerations

The following considerations should be kept in mind:

- ◆ **Captioning**
 - the service should create a caption file(s) for streaming
 - jargon specific to a given field may not be correctly recorded by a service
 - the turnaround time pertaining to captioning could be problematic with lecture capture or other uses which require the media to be available quickly
- ◆ **Descriptive audio**
 - Who creates this? Is it sent to a service that your library regularly uses?
 - What are the costs and who is responsible for these costs?

Technologies

The following technologies can help with in-house video captioning:

- ◆ **Open source**
 - [Amara](#)
 - [YouTube: Captions and Subtitles](#)
 - [Inclusive Media & Design: CapScribe](#)
 - [Overstream](#)

◆ **Paid software**

- [TechSmith: Camtasia](#) (note this may only produce open captions which are always displayed)
- [Nuance: Dragon NaturallySpeaking](#)

Procurement of accessible audio-visual materials

Negotiating with vendors to provide accessible formats for all audio-visuals will save library staff a lot of time when accommodating user requests for accessible formats. Libraries should consider making every attempt to purchase media that is already captioned. If it cannot be purchased, the media might be captioned by a third party before it is made available to users.

4.4.5 How can I caption videos legally? Considerations when securing legal permissions

Permission should be sought to provide closed captions for videos. For a sample draft of a permission form to secure the copyright or rights holder's permission to provide closed captioning, refer to the [Negotiating for accessible audio-visual formats](#) section of this toolkit.

Getting a video or an audio file captioned, or captioning it yourself often means duplicating the video (creating a second online or physical copy with captions.) As per [Section 32](#) of the Canadian Copyright Act, you can convert almost anything into an accessible format except for “cinematographic works,” and those are defined as: “any work expressed by any process analogous to cinematography, whether or not accompanied by a soundtrack.”

Whereas most videos from larger production companies will include captions or at the very least subtitles, videos by smaller organizations may not have captions. In those cases, you can contact the copyright holder (usually the producing organization) and ask them about getting the file captioned. In some cases online/freely available videos will not include captions but the commercially-available DVD version will, so it is best to inquire.

For uncaptioned videos posted online on services such as YouTube or Vimeo, you generally are not legally permitted to extract and re-post the video with captions. Using the “automatic captions” available on YouTube is not recommended due to the poor quality. If the video is posted with a Standard YouTube License (which most are) you cannot legally extract and repost it with captions (even if your motivations are merely to make it more accessible). If it has a Creative Commons license you may be able to, but you have to look at the terms of that License.

Accessibility Information Toolkit for Libraries

Another option is to try using Overstream or Amara (linked above) to caption a video yourself (which doesn't technically reproduce the video) but you need to be certain to give viewers the appropriate link to the video that takes them through the “captioned overlay.”

For more information on other legal considerations, please refer to the [Law and administration](#) section of this toolkit.

4.5 External contractors

[4.5.1 Introduction](#)

[4.5.2 What does AODA compliance mean for engaging contractors?](#)

[4.5.3 What makes a project accessible?](#)

[4.5.4 Considerations when procuring](#)

[4.5.5 Tools for creating an accessible project](#)

4.5.1 Introduction

Depending on the structure of your institution, the library may or may not have direct control over the tender and hiring process of external contractors. Often, contracts are managed by a general, university plant operations or facilities department, with a project manager from that department assigned to oversee the work. However, in some cases the library staff are involved in the recruitment or the supervision of contract workers. The following tools have been developed to assist library staff when procuring contract workers. Consultation with local accessibility staff is advised.

4.5.2 What does AODA compliance mean for engaging contractors?

Under the [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#), all employees, contract-staff and volunteers are required to receive training on providing accessible customer service.

Construction/public works projects are often contracted to outside companies. It is important that contractors be aware of the library's commitment to accessibility so that the work does not create additional barriers for people with disabilities.

4.5.3 What makes a project accessible?

The basic goal is to create a safe and accessible environment for all users, while not creating additional barriers for people with disabilities.

For example:

- ◆ Routes around the construction area are free of obstacles so that passers-by don't need to constantly watch their step. In some instances, they might not be able to.
- ◆ Routes are wide enough for people with mobility devices (wheelchairs, walkers, scooters, crutches) to get by.
- ◆ Alternate, accessible routes are clearly signed.

4.5.4 Considerations when procuring

- ◆ Include accessibility requirements in your tender:
 - Does the company train its employees in providing accessible service, as required by the Customer Service Standard, [Section 6: Training for Staff?](#)

- Does the company have a plan for providing access or alternate accessible routes?
- Are the routes wide enough for people using mobility devices (wheelchairs, etc.)?
- Are the routes free of obstacles?
- Are obstructions (for instance, fences, steps) visible, clearly marked/identified?
- Is there turning space for people using wheelchairs or other mobility devices?
- Does the company use accessible signage—visible, placed at an accessible height?
- Does the company have emergency procedures to assist people with disabilities?
- ◆ Establish procedures for after-hours accessibility and safety:
 - For example, if a ramp is closed off for repair, make sure that users have an alternate means of access, and that this access is clearly signed.
- ◆ Establish procedures to ensure that services and resources are accessible during the construction period:
 - If an area is inaccessible to people with disabilities, develop alternate ways of providing the services/resources.
- ◆ Communicate the disruption in service via the library website and other appropriate avenues:
 - Inform library staff of changes in procedure needed to ensure accessibility during the construction project.
 - Ensure that signage is placed at an accessible height.

4.5.5 Tools for creating an accessible project

- ◆ [Ontario Building Code, Section 3.8: Barrier-Free Design](#)
- ◆ [Accessibility Directorate of Ontario \(ADO\): Making buildings and spaces accessible](#)
- ◆ [Accessibility Directorate of Ontario \(ADO\): Providing accessible customer service for January 1, 2012 \(Webcast\)](#)
- ◆ [Accessibility Directorate of Ontario \(ADO\): How-to videos on accessibility](#)
- ◆ [Georgia Tech Research Institute: Accessibility Assistant](#)
 - Under 'Roles', select 'Designer/Engineer' to gain perspective on the interaction between accessibility and technical requirements.

4.6 Maps and data

[4.6.1 Introduction](#)

[4.6.2 What are accessible maps?](#)

[4.6.3 Factors to consider when purchasing accessible web maps](#)

[4.6.4 What are accessible data sets?](#)

[4.6.5 Removing barriers to access for maps and data](#)

4.6.1 Introduction

Maps and data can create significant information barriers to users with disabilities. All maps, by their very nature, present challenges for people with vision loss, as the information is highly dependent on images and visual orientation. The following section offers points of consideration when increasing accessibility of procuring new resources.

4.6.2 What are accessible maps?

With printed maps and static digital maps, there are only a few things that can be done to improve accessibility, including:

- ◆ Use of large print
- ◆ Use of high contrast colours
- ◆ Use of braille (in print)
- ◆ Conversion to tactile images (refer to [TactileView](#) software for a demonstration)
- ◆ Provision of textual descriptions of the content of the map

The move of maps to interactive online environments, whether on a desktop computer or a mobile device, has brought both new challenges and new opportunities for users with disabilities. Accessibility needs are not limited to those with visual impairments; for example, users who have mobility, dexterity, or cognitive challenges which require them to use specially designed computer peripherals may have difficulty navigating online maps or maps on mobile devices. Internet speed and out-dated browser technology can also affect access.

“Multi-modal” mapping technologies add haptic and audio aspects to the experience of a map. One example is the use of mobile apps to provide audio support for navigating virtual tactile maps. This technology, while promising to people with disabilities, is still in its early stages.

4.6.3 Factors to consider when purchasing accessible web maps

Functionality

- ◆ Simple interface design
- ◆ All functionality usable with keyboard and other devices (not just mouse)
- ◆ Appropriate text alternatives for the controls

- ◆ Usable in high-contrast mode
- ◆ Usable with increased map and text size
- ◆ Using assistive technologies does not break the map functionality

Information being conveyed

- ◆ Provide accessible formats (data tables, text only, etc.)

4.6.4 What are accessible data sets?

Designers of library interfaces that provide access to datasets need to consider:

- ◆ Simple interface design
- ◆ All functionality usable with keyboard and other devices (not just a mouse)
- ◆ Appropriate text alternatives for all functionality
- ◆ All tables which display on the interface should have column and row headers properly identified so that screen reader software can “read” the table
- ◆ Usable in high-contrast mode and with increased text size
- ◆ Offering multiple formats for download so that users can access the data file with their chosen statistical software package (that best meets their needs)

4.6.5 Removing barriers to access for maps and data

While the procurement of fully accessible resources might not always be possible, the first step to addressing the information barriers that providing maps and data create is to acknowledge these barriers exist, and encourage user feedback. For example including a basic statement where this information is found (library website, data repository) that encourages users to contact library staff if they require accommodation due to a disability can go a long way to bridging this gap. Library staff can then work with users to find ways to accommodate their information needs.

4.7 Model license and contract language

[4.7.1 Introduction](#)

[4.7.2 Model license language for eresources and databases](#)

[OCUL: ejournals and databases model license](#)

[Ryerson University: sample collection policy language](#)

[4.7.3 Negotiating for accessible audio-visual formats](#)

[Ryerson University: sample collection policy language](#)

[George Brown College: captioned media and e-text policy](#)

[Wisconsin University and Wisconsin Technical College](#)

[Permission form to caption videos](#)

[4.7.4 Engaging external contractors' services](#)

[Sample contract language](#)

[Accessible customer service training](#)

[Sample policy language for accessible customer service training](#)

[4.7.5 Sample policy language for negotiating accessible IT hardware, software and services](#)

[4.7.6 What other accessible procurement resources are available to me?](#)

[American Library Association \(ALA\) guide](#)

[Other tools for evaluating product accessibility](#)

4.7.1 Introduction

The following is a collection of suggested licensing language applicable to the procurement of library resources and associated services. This language can be used as a tool for developing a library's own accessibility terminology when formulating procurement guidelines and should be adapted by each institution.

4.7.2 Model license language for eresources and databases

OCUL: ejournals and databases model license

The following statement is from the [Ontario Council of University Libraries \(OCUL\) Model License for Electronic Journals and Databases](#), Section 3.15 Usage Rights:

“Licensed Materials must be provided in an Accessible Format. Without limiting the previous sentence, in the event that any Licensed Materials are not available in an Accessible Format, the Member Institution shall have the right to modify or copy the Licensed Materials in order to make it useable to Authorized Users within the scope of this Agreement.”

Ryerson University: sample collection policy language

The following statement is from the [Ryerson University Collection Development Policy](#) section on [Policies by Type of Material](#), and is applicable to ebooks, ejournals and databases:

“Platforms with accessible interfaces (accessible via screen readers) and those which offer accessible format download options (for instance, versions that are machine-readable) will be preferred...”

4.7.3 Negotiating for accessible audio-visual formats

Ryerson University: sample collection policy language

The following statement is from a Ryerson University working document:

“Videos with closed captions and/or audio description will be preferred. Videos without closed captions or English subtitles will only be acquired if the permission to caption is granted by the creator or copyright holder.”

George Brown College: captioned media and e-text policy

The [George Brown College Policies](#) define “media” to include:

“VHS video, DVD, digitally streamed video files using web based applications and any other format that includes an audio-visual component closed captioning functions as well as how faculty members can ensure that material produced for their courses is accessible.”

The policies further state:

“All media resources purchased and used in the College must be captioned or captionable and all textbooks used for instructional purposes must be available in an e-text format. All new instructional, informational, marketing and promotional audio-visual materials produced by the College will be produced with captions on the master tape to ensure all subsequent copies will be captioned. This will include all course materials posted on WebCT (or other similar course management systems) for student use.”

Wisconsin University and Wisconsin Technical College

The [Wisconsin Post-Secondary Captioned Media Policy Guide \(Draft\)](#) was developed to comply with American legislation. It is valuable in the context of this toolkit insofar as it offers useful guidelines on ensuring media accessibility.

This guide addresses requirements on all purchases of new content and for obtaining permission to modify existing content with captions, including:

- ◆ policy statement templates
- ◆ obtaining copyright permissions and sample request letters
- ◆ captioning existing media
- ◆ purchasing new media

Permission form to caption videos

This is a sample draft of a permission form to secure the copyright or rights holder’s permission to close caption a video. It is based on a draft document from [Ryerson University Library’s Accessible Format Production](#), and can be adopted as needed to suit your institutional needs. This form can also be implemented for all non-closed captioned future video acquisitions.

Name of rights/copyright holder or distributor:

Your name and contact information:

Title of film and duration:

Copyright year:

In the interest of fostering an environment of inclusivity and accessibility to resources, and in order to comply with the Accessibility for Ontarians with Disabilities Act (AODA),

1. Do we have your permission to create a text transcript and a closed captioned version of the video named above? [yes / no checkboxes]
2. If so, do we have your permission to add the closed captioned copy of the video (named above) to the Library's circulating collection? [yes / no checkboxes]
3. The video submitted is the original copy [yes / no checkboxes]

If you answer yes to questions 1 and 2, and if your video is captioned in-house by [NAME OF YOUR INSTITUTION], we would be happy to offer you a complimentary copy of the transcript file, and of the captions file in two common formats (a .srt and a .stl).

To facilitate the captioning of your video, please provide your video, any transcript you may have available, and the completed permission form with appropriate signatures to [DEPARTMENTAL ADDRESS].

I acknowledge that I have read the above information with care and that I am the legal copyright holder/distributor/producer of this work. [yes / no checkboxes]

Signature

4.7.4 Engaging external contractors' services

Sample contract language

“The library is committed to including accessibility in the planning process. External contractors are requested to work with _____ (Name of your institution) to plan accessible routes, signage and procedures. Contractors are to ensure that all employees have successfully completed legislated AODA training. This will ensure that all users have equitable access and remain safe during the construction period.”

Accessible customer service training

Under the [Customer Service Standard](#), employees of all organizations were expected to have completed accessible customer service training by January 1, 2012.

[Section 5](#) of the Accessibility Directorate of Ontario (ADO)'s [Guide to the Integrated Accessibility Standards Regulation \(IASR\)](#) states:

“Another criterion that could be included is accessibility training. This may be important for organizations when hiring another organization to provide services for them.”

OCUL institutions should stipulate that outside companies/businesses/contractors provide accessible customer service—which could be direct service or goods - and must incorporate accessibility principles into the management of all projects.

For more useful tips on what to look for when recruiting a new company, please consult the criteria to consider for services in [Section 2: Set your accessibility criteria](#) in the ADO's guide to [Making your purchases more accessible](#).

Sample policy language for accessible customer service training

OCAD University's [Purchasing Policy and Procedures Manual \(2011\)](#), p.5, states:

“In compliance with the Accessibility for Ontarians with Disability Act (AODA), 2005 all contractors are required to undertake training in Accessible Customer Service and provide the proof by sending an email to [university name] prior to start of the contract.”

The following statement is from [The Americans with Disabilities Act \(2013\)](#) by Angela Dresselhaus:

“Provider will [make reasonable efforts to] comply with AODA ... by supporting assistive technologies or devices such as large print interfaces, voice-activated input, screen readers, and alternate keyboard or pointer interfaces in a manner consistent with the Web Content Accessibility Guidelines published by the World Wide Web Consortium (W3C)’s Web Accessibility Initiative and provide Licensee current completed Voluntary Product Accessibility Template (VPAT).”

4.7.5 Sample policy language for negotiating accessible IT hardware, software and services

“When procuring goods, services and facilities, _____ (name of your institution) will incorporate accessibility features wherever possible. Institutional procurement documents will outline the desired accessibility criteria and provide guidelines for the evaluation of proposals in respect of these criteria. Where it is impractical for _____ (name of your institution) to incorporate accessibility criteria and features when procuring or acquiring specific goods, services or facilities, the _____ (office/individual responsible for this) will provide a written explanation, on request.”

OR

“_____ (Name of your institution) will incorporate accessibility criteria and features when procuring or acquiring goods, services.

In the event that it is not practicable to procure accessible goods or services, the university will provide a written explanation, detailing why accessibility criteria could not be incorporated (due to prohibitive costs or availability).”

4.7.6 What other accessible procurement resources are available to me?

The [Accessible Procurement Toolkit](#) originally produced for Industry Canada is an interactive resource that covers a wide variety of products ranging from furniture to documentation and software. This toolkit can be searched by keyword or by type of product, making it a straightforward and easy tool to use.

American Library Association (ALA) guide

The Association of Specialized & Cooperative Library Agencies (ASCLA), a subdivision of the American Library Association (ALA), has produced a guide for accessible procurement:

[Think Accessible Before You Buy:](#)

- ◆ [Understanding the Language](#)
- ◆ Internet and Web
 - [Accessibility Guidelines](#)
 - [Evaluation Forms](#)
- ◆ Computer Software
 - [Accessibility Guidelines](#)
 - [Evaluation Forms](#)

Other tools for evaluating product accessibility

- ◆ [Information Technology Industry Council \(ITIC\): Voluntary Product Accessibility Template \(VPAT\) Version 1.3](#)
 - This form is used to document a product's compliance with the accessibility standards under the American accessibility requirements. “The purpose of the VPAT is to assist Federal contracting officials in making preliminary assessments regarding the availability of commercial Electronic and Information Technology products and services with features that support accessibility. It is assumed that officers will provide additional contact information to facilitate more detailed inquiries.”
- ◆ [World Wide Web Consortium \(W3C\): Involving Users in Evaluating Web Accessibility](#)
 - Outlines different aspects of evaluating web accessibility.
- ◆ [Centre for Excellence in Universal Design \(CUID\): IT Procurement Toolkit - Evaluating Deliverables](#)
 - Describes how accessibility evaluation and testing works with a variety of products, highlighting the value of user testing.

To find out about procurement policies at your university, please visit the [Ontario University Procurement Management Association \(OUPMA\)](#) page.

5 LAW AND ADMINISTRATION

5.1 AODA and university libraries

5.2 Canadian copyright and accessibility

5.3 Legal framework: Canada and United States

5.1 AODA and university libraries

[5.1.1 Introduction](#)

[5.1.2 What is the AODA?](#)

[5.1.3 Where can I learn more about the AODA?](#)

[5.1.4 Customer Service Standard](#)

[About the standard](#)

[Relevant sections](#)

[What does the Customer Service Standard require university libraries to do?](#)

[Frequently asked questions](#)

[5.1.5 Integrated Accessibility Standards Regulation \(IASR\)](#)

[About the regulation](#)

[Relevant sections](#)

[What does the Integrated Accessibility Standards Regulation \(IASR\) require university libraries to do?](#)

[Frequently asked questions](#)

5.1.1 Introduction

This section of the toolkit addresses key questions pertaining to law and administration and the [Accessibility for Ontarians with Disabilities Act, S.O. 2005, ch.11 \(AODA\)](#) as they relate to university libraries. It is intended to provide library personnel with basic information, links to useful resources and relevant legislations, and working examples to consider when applying the AODA standards in their local contexts.

This toolkit does not provide definitive answers, but instead provides a series of questions and supplemental information for library personnel to consider and take to their internal legal counsel.

5.1.2 What is the AODA?

The goal of the AODA is to make Ontario accessible by 2025 through the development, implementation, and enforcement of standards relating to five areas: customer service, employment, information and communications, transportation, and the design of public spaces.

The [Accessibility Standards for Customer Service, O.Reg. 429/07 \(Customer Service Standard\)](#) is already in effect. The deadline for compliance was December 31, 2010.

The other four standards are part of the [Integrated Accessibility Standards Regulation, O.Reg. 191/11 \(IASR\)](#). Sections of the IASR that are particularly relevant to libraries are discussed briefly in the following sections.

5.1.3 Where can I learn more about the AODA?

- ◆ Michele Chittenden's [Disabilities and Accessibility in Ontario \(2009\)](#) article explains the AODA with respect to libraries.
- ◆ The Accessibility Directorate of Ontario (ADO)'s [Making Ontario Accessible](#) website provides a readable and action-oriented explanation of the accessibility standards.
- ◆ The ADO also has an online [AODA Compliance Wizard](#) that will summarize steps needed to attain compliance.

5.1.4 Customer Service Standard

About the standard

At a high level, this standard requires libraries to develop policies, practices and procedures on the provision of goods and services to persons with disabilities that are consistent with the following principles (from [Section 3: Establishment of policies, practices and procedures](#)):

1. The goods or services must be provided in a manner that respects the dignity and independence of persons with disabilities.
2. The provision of goods or services to persons with disabilities and others must be integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods or services.
3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services

These principles provide good criteria for assessing services and supports in a wide range of contexts including information and communication accessibility.

Relevant sections

- ◆ [Section 3: Establishment of policies, practices and procedures](#)
- ◆ [Section 4: Use of service animals and support persons](#)
- ◆ [Section 5: Notice of temporary disruptions](#)
- ◆ [Section 6: Training for staff, etc.](#)
- ◆ [Section 7: Feedback process for providers of goods or services](#)
- ◆ [Section 8: Notice of availability of documents and format of documents](#)
- ◆ [Section 9: Format of documents](#)

What does the Customer Service Standard require university libraries to do?

- ◆ [Section 4: Use of service animals and support persons](#)
 - Permit the use of both guide dogs and support persons by persons with disabilities on library premises

- ◆ [Section 5: Notice of temporary disruptions](#)
 - Provide public notice of any temporary disruption to library services, including duration of the disruption and alternative access to services, and post it both in print and electronic format in conspicuous places.
- ◆ [Section 6: Training for staff](#)
 - Provide training on accessible customer service to all library employees who have contact with the public, as well as staff who develop library services and policies dealing with the provision of public services
- ◆ [Section 7: Feedback process for providers of goods or services](#)
 - Create a feedback process for receiving and responding to feedback from individuals with disabilities by telephone, in writing, or through e-mail regarding the accessibility service provision.
- ◆ [Section 8: Notice of availability of documents](#)
 - Notify all library users of the availability of documents in an accessible format upon request. This notice may be posted in a conspicuous place on the premises, on the library's website, or by other suitable methods.
- ◆ [Section 9: Format of documents](#)
 - Provide a copy of the requested document, or the information contained in the document, in a format that takes into account the person's disability.

Frequently asked questions

Do my library's student helpers, temporary employees, and volunteers need to be trained in providing accessible customer service?

Yes, if these individuals have contact with the public or are developing policies and procedures for public services. Refer to the Customer Service Standard, [Section 6: Training for staff](#).

Where can I learn more about the AODA Customer Service Standard?

Useful resources include:

- ◆ [Customer Service Standard](#) guide, created by the Accessibility Directorate of Ontario (ADO)
- ◆ [Serve-Ability: Transforming Ontario's Customer Service](#), from the ADO's online accessible customer service training course

- ◆ [Customer Service Online Training Tool](#), developed by the Council of Ontario Universities (COU)

5.1.5 Integrated Accessibility Standards Regulation (IASR)

About the regulation

As with the Customer Service Standard, your university may already be addressing a number of the IASR requirements. While it is valuable to review and develop library-specific information and communication-related policies and practices, you may wish to confer with your University AODA officer to coordinate your plans with existing campus initiatives.

Relevant sections

- ◆ [Section 11: Feedback](#)
- ◆ [Section 12: Accessible formats and communication supports](#)
- ◆ [Section 13: Emergency procedure, plans or public safety information](#)
- ◆ [Section 14: Accessible websites and web content](#)
- ◆ [Section 15: Educational and training resources and materials, etc.](#)
- ◆ [Section 17: Producers of educational or training material](#)
- ◆ [Section 18: Libraries of educational and training institutions](#)

What does the Integrated Accessibility Standards Regulation (IASR) require university libraries to do?

- ◆ [Section 11: Feedback](#)
 - Ensure that the processes for receiving and responding to feedback are available to persons with disabilities in accessible formats or with appropriate communication supports, on request. This only applies if there is a process for receiving and responding to feedback.
 - **Compliance date:** January 1, 2014
- ◆ [Section 12: Accessible formats and communication supports](#)
 - Provide information and communicate in accessible manner about their goods, services or facilities to people with disabilities upon request in a way which meets the following criteria:

- i. In a timely manner which recognizes that persons with disabilities may require more time to assimilate the requested information
 - ii. At no additional cost than paid by other persons
 - iii. Persons making the request are consulted regarding suitable accessible formats
 - iv. The public is notified regarding the availability of accessible formats
- **Compliance date:** January 1, 2015
 - ◆ Section 14: Accessible websites and web content
 - Library websites and web content posted since January 1, 2012 must conform to the Web Content Accessibility Guidelines (WCAG) 2.0 Level A by January 1, 2014 and Level AAA by January 1, 2021.
 - **Compliance date:** January 1, 2014: new internet websites and web content
 - **Compliance date:** January 1, 2021: all internet websites and web content
 - ◆ Section 15: Educational and training resources
 - Provide educational or training resources in an accessible format upon request to a person with a disability in a format that takes their accessibility needs into account, either by purchasing them or acquiring them through other means. If these resources cannot be procured or converted into an accessible format, a comparable and accessible resource must be provided.
 - **Compliance date:** January 1, 2013
 - ◆ Section 18: Libraries of education and training institutions
 - Provide or procure accessible versions of print-based materials in their collections when requested by a person with a disability beginning on January 1, 2015. By January 1, 2020, this will be expanded to include accessible versions of digital and multimedia materials.
 - **Compliance date:** January 1, 2015: print-based resources or materials
 - **Compliance date:** January 1, 2020: digital or multimedia resources or materials

Frequently asked questions

What are some examples of accessible formats and communication supports?

Accessible formats include “large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.”

Communication supports include “captioning, alternative and augmentative communication supports, plain language, sign language...”

Do the Integrated Standards provide a standard for document accessibility similar to their use of the WCAG 2.0 as a best practice for Web accessibility?

Beyond the accessible formats listed above, no accessible document definition or standard is given in the Integrated Accessibility Standards to guide document creation practices. However, the general principles of the [Web Content Accessibility Guidelines \(WCAG\) 2.0](#) can be adapted to provide best practices for accessible document creation.

What are some common document accessibility issues?

Common issues include:

- ◆ Use of bolding and font size to indicate headings rather than actual heading styles, thus making it harder for screen reader users to navigate documents
- ◆ Image files in documents lacking alternative text ‘tags,’ so that the image content cannot be deduced by screen reader users
- ◆ Insufficient contrast between the text and background, or use of colour combinations that individuals who are colourblind find difficult to distinguish
- ◆ Scanning a document into a PDF such that it is a ‘flat’ or no-text PDF, containing only the image of text as opposed to actual text. Flat PDFs cannot be accessed by screen reader users.

Do we have to provide accessible articles through our online catalogue and journal databases even if they haven’t been requested by a user?

[Section 14](#) of the IASR is limited to web content “...that an organization controls directly or through a contractual relationship that allows for modification of the product.” Therefore, journal articles and other web-based electronic documents that are purchased from external vendors are outside the scope of this section. However, [Section 5](#) of the IASR requires institutions to “incorporate accessibility criteria and features” when acquiring

goods when practicable, so libraries should start thinking about accessibility considerations when purchasing content from software vendors and publishers.

What exactly does WCAG 2.0 Level A require us to do our website?

There are numerous, reliable websites that provide a simplified guide to understanding and implementing the [Web Content Accessibility Guidelines \(WCAG\) 2.0](#), including:

- ◆ [Making your website more accessible](#) by Accessibility Directorate of Ontario (ADO)
- ◆ [WCAG 2.0 Checklist](#) by Web Accessibility in Mind (WebAIM)

Do the documents and videos on electronic reserve and in our University's Learning Management System have to be made accessible under IASR Web accessibility requirements?

If these resources are behind authentication, this is probably not the case. [Section 14](#) of the IASR only requires the *provincial government* to make its 'Intranet' material accessible. Given the definition of intranet in the Integrated Standards ("...an organization's internal website that is used to privately and securely share any part of the organization's information or operational systems within the organization..."), the prevailing interpretation is that electronic reserves and learning management systems fall into this category and are therefore exempt from Section 14 but not [Section 12](#) or [Section 15](#). Before adopting this position, you should consult first with your institution's AODA officer and legal counsel.

We couldn't revise our website to meet all the WCAG 2.0 guidelines by January 1, 2012. Should we be concerned?

According to [Section 14](#), web accessibility requirements only apply to areas where meeting them is practicable. The section provides a partial definition of practicability indicating that organizations may consider, "...among other things, (a) the availability of commercial software or tools or both; and (b) significant impact on an implementation timeline that is planned or initiated before January 1, 2012." Therefore, a library could cite practicability in deciding not to automatically provide audio description or descriptive transcripts for web-based video because of the lack of commercial software or tools for generating them.

Since the definition of practicability given in Section 14 is somewhat open-ended, other factors could reasonably be considered as well, such as expense, staff resources, or the relative importance of document/multimedia content and whether this content is duplicated elsewhere in an accessible format. Ontario Human Rights legislation already includes an [Undue Hardship Standard](#), which stipulates that students with disabilities have

a right to be accommodated up to the point of undue hardship for the institution; costs are cited as one factor in determining what constitutes undue hardship.

When considering if or how to integrate practicability into your web accessibility policy, it would be important to consult your University AODA officer and legal counsel to ensure that your practices are congruent with your institution's policies.

We have never received a request from a student with a disability to provide accessible versions of their course textbooks and training materials. Do we need to create accessible-format course materials service to comply with Section 15 of the Integrated Accessibility Standards?

Check with your campus accessibility services office – if you're not providing this service, it is likely that they are doing so.

We have web-based resources in our collection that could fall under Section 14 but could conceivably also fall under Sections 12, 15 or 18. Do we need to make the resources accessible by January 1, 2014 in accordance with Section 14 or, as stipulated in the other sections, do we wait until we receive a request from an individual with a disability?

A reasonable solution to this issue is to treat any resources that are posted on a library's publicly-accessible website in accordance with [Section 14](#) (for instance, automatically make them accessible) regardless of their subject matter or whether they are part of a library's collection. Otherwise, categorizing web-based library resources as [Section 12](#), [Section 15](#), or [Section 18](#) materials quickly reduces Section 14 to a meaningless category.

What if a person who is not registered with our University's accessibility services office asks for a print, digital or multimedia resource to be made accessible?

The immediate concern is verifying their disability claim. This is a good discussion to have with your University's AODA officer.

Where can I learn more about the AODA Integrated Accessibility Standard?

Useful general resources include:

- ◆ [Guide to the Integrated Accessibility Standards Regulation \(IASR\)](#) published by Accessibility Directorate of Ontario (ADO)

- ◆ [Accessible Campus Reference Library](#) published by the Council of Ontario Universities (COU)

Useful document accessibility resources include:

- ◆ [Guidance on Applying WCAG 2.0 to Non-Web Information and Communications Technologies](#)
- ◆ [Accessible Digital Office Document \(ADOD\) Project](#)
- ◆ [Accessibility in Microsoft Office 2010](#)
- ◆ [Creating accessible Microsoft Word documents](#)
- ◆ [Web Accessibility in Mind \(WebAIM\)](#)
- ◆ [Creating Accessible Adobe PDF Documents \(PDF\)](#)
- ◆ See also the [ISO Standard 14289-1](#), better known as PDF/UA (for PDF/Universal Accessibility).

5.2 Canadian copyright and accessibility

5.2.1 Introduction

5.2.2 Does the Canadian Copyright Act allow libraries to make copies for individuals with perceptual disabilities?

5.2.3 What kinds of alternate format copies may be made under the Copyright Act?

5.2.4 What types of works may be copied on behalf of individuals with perceptual disabilities?

5.2.5 How can libraries make videos and films accessible to individuals with perceptual disabilities, when the Copyright Act specifically excludes cinematographic works from this exception?

5.2.6 How is “perceptual disability” defined in the Copyright Act?

5.2.7 What are Technological Protection Measures (TPMs) and how do they affect copies made for individuals with perceptual disabilities?

5.2.8 How does the Copyright Act relate to the AODA? Which Act takes precedence?

5.2.1 Introduction

This section of the Toolkit provides guidance to university libraries on the interpretation of the [Canadian Copyright Act \(R.S.C., 1985, c. C-42\)](#) as it relates to the provision of accessible content under the [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#). It is intended to address common copyright questions that are likely to arise as institutions work to comply with the requirements of the AODA. Links to relevant legislation as well as supplementary resource materials are also included.

It is important to note that this section is an interpretation of the legislation (Copyright Act and AODA) and does not constitute legal advice. Rather than providing definitive answers, this section provides guidance on best practices, based on consultation with legal and accessibility experts in the OCUL community. It is advisable to consult with local expertise wherever possible.

5.2.2 Does the Canadian Copyright Act allow libraries to make copies for individuals with perceptual disabilities?

The Canadian Copyright Act, [Section 32\(1\)](#), permits alternate format copies to be made for individuals with perceptual disabilities, of literary, dramatic, artistic and musical works, but not cinematographic works (for instance, motion pictures, films and videos).

The alternate format copies may be made either by the individual with the perceptual disability, or by someone acting at the request of the individual. The Act also permits alternate format copies to be made by a non-profit organization acting for the benefit of such an individual. University libraries and their staff may therefore make copies for individuals with perceptual disabilities, provided the conditions set out in Section 32 of the Act are followed.

Some limitations apply to the types of materials that can be copied, and the format of the copies that can be made.

5.2.3 What kinds of alternate format copies may be made under the Copyright Act?

[Section 32\(1\)](#) permits making the copy or sound recording in a format specially designed for a person with a perceptual disability, and includes the translation, adaptation, or reproduction in sign language of a work (not including a cinematographic work). This exception does not extend to the making of large-print format books.

The exception in 32(1) does not apply where the work or sound recording to be copied is commercially available in a format specially designed to meet the needs of the individual with the perceptual disability for whom the copy is being made. Commercially available, as it applies to this exception, means available on the Canadian market within a reasonable time and for a reasonable price and able to be located with reasonable effort. The Act does not define “reasonable”, and interpretation of this term may vary by institution.

5.2.4 What types of works may be copied on behalf of individuals with perceptual disabilities?

[Section 32\(1\)](#) permits copies to be made of literary, musical, artistic, or dramatic works, but not cinematographic works (for instance, motion pictures, films and videos).

5.2.5 How can libraries make videos and films accessible to individuals with perceptual disabilities, when the Copyright Act specifically excludes cinematographic works from this exception?

Generally, it will be necessary to seek permission from the copyright owner of the work in order to make an alternate format copy (for instance, captioned) of an entire video or film. In some cases the copyright owner may be able to provide a captioned copy of a film or video.

It may also be possible in some cases to make alternate format copies of short excerpts of cinematographic works under the fair dealing exception in the Copyright Act [Section 29](#), which permits copies to be made for the purpose of education, research, criticism, review, news reporting, satire and parody, provided the copies being made are fair.

There is no definition of “fair” in the Copyright Act, but the Supreme Court of Canada has provided some guidance on how to assess whether copying may be considered fair dealing. For more information, see [CCH Canadian Ltd. vs. Law Society of Upper Canada](#), Sections 53-60. Your university or library may also have its own fair dealing guidelines that can be consulted.

For more information about accessible audio-visual resources please refer to the [Audio-visual materials](#) section of the Toolkit.

5.2.6 How is “perceptual disability” defined in the Copyright Act?

The Copyright Act defines "perceptual disability" as a disability that prevents or inhibits the individual from accessing the print material due to a visual impairment, a physical disability, or a comprehension disability. For the specific language, refer to [Section 32\(1\)](#) in the Canadian Copyright Act.

5.2.7 What are Technological Protection Measures (TPMs) and how do they affect copies made for individuals with perceptual disabilities?

A technical protection measure (TPM) is the formal term used in Canadian copyright legislation for a digital lock. A TPM is a software device aimed at ensuring authorized uses of a work, either by controlling access to the work or by controlling uses of the work, such as copying, distribution or performance. The Copyright Act prohibits the circumvention of TPMs, unless the circumvention is done with the permission of the copyright holder. This means that, even if a work can be copied under an exception in the Copyright Act like fair dealing, you cannot circumvent the digital lock to access the work without the permission of the copyright holder (see Copyright Act, [Section 41](#)).

TPMs can cause a variety of problems for individuals with perceptual disabilities as they are often associated with platforms or software (For example, for ebooks) that may limit the use of screen reading software, make obtaining a large print copy difficult, or limit the ability to download and modify content.

There are a few limited exceptions that apply to Section 41, including one for people with perceptual disabilities ([Section 41.16](#)):

- (1) Paragraph 41.1(1) (a) does not apply to a person with a perceptual disability, another person acting at their request or a non-profit organization acting for their benefit if that person or organization circumvents a technological protection measure for the sole purpose of making a work, a performer’s performance fixed in a sound recording or a sound recording perceptible to the person with a perceptual disability.
- (2) Paragraphs 41.1(1) (b) and (c) do not apply to a person who offers or provides services to persons or organizations referred to in subsection (1), or manufactures, imports or provides a technology, device or component, for the purposes of enabling those persons or organizations to circumvent a technological protection measure in

accordance with that subsection, to the extent that the services, technology, device or component do not unduly impair the technological protection measure.

While this section does (in theory) permit libraries to circumvent a TPM for a person with a perceptual disability, it is only “to the extent that the services, technology, device or component do not unduly impair the technological protection measure.” This language has been criticized by groups representing the visually impaired (see [Michael Geist: The Daily Digital Lock Dissenter](#) – particularly the entries representing the [Provincial Resource Centre for the Visually Impaired](#), and the [Canadian National Institute for the Blind \(CNIB\)](#)).

5.2.8 How does the Copyright Act relate to the AODA? Which Act takes precedence?

There has been some confusion around meeting both the requirements of the AODA and the Copyright Act. The AODA does not provide you with the right to copy – it just states that you need to be able to provide an accessible format upon request. This means that the AODA cannot be used as an excuse to break copyright law. In addition, if there was an actual conflict between the two laws, the doctrine of paramountcy establishes that “when federal and provincial laws cover the same or similar subject matters, and there is a conflict between those laws, the central law is operative and the provincial law (to the extent of the conflict) is rendered inoperative.”

For more details see [Doctrine of Paramountcy](#) published by the University of Alberta Centre for Constitutional Studies.

5.3 Legal framework: Canada and United States

5.3.1 Introduction

5.3.2 Canadian legal framework

Canadian Charter of Rights and Freedoms

Broadcasting and Telecom Regulatory Policy 2009-430

Access to Information Act

5.3.3 Ontario legal framework

Ontario Human Rights Code

Freedom of Information and Privacy Act (FIPPA)

5.3.4 United States legal framework

What US accessibility laws do I need to be aware of?

What is the Americans with Disabilities Act (ADA)?

How do ADA and AODA compare?

What kind of examples have the libraries in the United States developed to make electronic resources accessible?

5.3.1 Introduction

This section recognizes that Ontario universities operate within a global post-secondary education setting reliant on international networks and information flows. It looks at the legal framework as it pertains to accessibility and human rights in Canada and the United States. This may be of particular use for libraries working with American publishers, and vendors, and those in need of understanding the context of the international research community.

5.3.2 Canadian legal framework

In addition to the [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#) and the [Canadian Copyright Act](#), there are a number of pieces of federal legislation to keep in mind when thinking about accessibility in your library.

Canadian Charter of Rights and Freedoms

The [Canadian Charter of Rights and Freedoms](#) guarantees “... right to the equal protection and equal benefit of the law without discrimination and, in particular, without discrimination based on race, national or ethnic origin, colour, religion, sex, age or mental or physical disability.” This provides a philosophical grounding for accessibility services.

For more information, please visit the [Canadian Charter of Rights and Freedoms](#) page.

Broadcasting and Telecom Regulatory Policy 2009-430

The [Broadcasting and Telecom Regulatory Policy CRTC 2009-430: Accessibility of telecommunications and broadcasting services](#) is a general policy wherein the Canadian Radio-television and Telecommunications Commission (CRTC) recommends detailed improvements and compliance by broadcasters in providing closed captioning (sections 72-101) and video description (sections 102-129). Although not obligatory for libraries, the policy is a possible source of guidelines for standards in these areas.

For more information, refer to the CRTC’s [Broadcasting Regulatory Policy CRTC 2012-362: Quality standards for English-language closed captioning](#).

Access to Information Act

The [Access to Information Act](#) provides “right of access to information in records under the control of a government institution.” It explicitly states the principle of making information available to the public ([Section 2](#)).

The Act also allows for persons with sensory disabilities to request and obtain records in accessible formats, either immediately or within a “reasonable” time frame ([Section 12.3](#)).

5.3.3 Ontario legal framework

In addition to the AODA, there are a few more pieces of Ontario legislation to keep in mind when thinking about accessibility in your library.

Ontario Human Rights Code

The [Ontario Human Rights Code](#) provides a philosophical and legal baseline for all library activities, as it prohibits discrimination against people on various grounds, including disability. This protection extends to many social areas, including employment and services.

The Integrated Accessibility Standard Regulations (IASR) explicitly states in [Section 1\(2\)](#) that:

“the requirements in the standards set out in this Regulation are not a replacement or a substitution for the requirements established under the Human Rights Code nor do the standards limit any obligations owed to persons with disabilities under any other legislation.”

See the [Ontario Human Rights Commission](#) website for a guide to the Code and links to more resources.

Freedom of Information and Privacy Act (FIPPA)

Like the federal Access to Information Act, the [Freedom of Information and Protection of Privacy Act \(FIPPA\)](#)’s purpose is to ensure a right of access to information held by institutions. Since this Act applies to Ontario universities, your university or library probably already has FIPPA guidelines in place that you can consult if needed.

FIPPA does not mention accessible formats but it does require “the head of an institution to assist persons with disabilities in making requests for access...” ([Section 60\(1\)\(b.1\)](#)).

5.3.4 United States legal framework

What US accessibility laws do I need to be aware of?

The major piece of American accessibility legislation is the [Americans with Disabilities Act \(ADA\)](#). While American law does not apply to Canadian institutions (unless there are university campuses across the border) this overview may provide valuable knowledge to Ontario employees who seek to build working relations with American publishers and suppliers.

What is the Americans with Disabilities Act (ADA)?

Last updated in 2005, the ADA has and will likely continue to require updates to maintain the Congressional intent of the law as the courts interpret it. It states “no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs or activities of a public entity, or be subjected to discrimination by any public entity.”

While the ADA does have some remarkably precise specifications, much of the work done by the statute is in the concept of “reasonable accommodation.” There are three categories of reasonable accommodation:

- i. “modifications or adjustments to a job application process that enable a qualified applicant with a disability to be considered for the position such qualified applicant desires; or
- ii. modifications or adjustments to the work environment, or to the manner or circumstances under which the position held or desired is customarily performed, that enable a qualified individual with a disability to perform the essential functions of that position; or
- iii. modifications or adjustments that enable a covered entity's employee with a disability to enjoy equal benefits and privileges of employment as are enjoyed by its other similarly situated employees without disabilities.”

So, for example, an employer would be required to provide large font or otherwise accessible materials for an employee with a print disability. Although these categories deal with employment, the principles in them can be generally applied.

Additionally, the ADA requires qualified businesses to provide the capacity to effectively communicate with qualified individuals. However, this can take many forms.

How do ADA and AODA compare?

While the government can and does seek to enforce the ADA, the law also creates “private rights of action” which allow citizens to seek redress against entities not in compliance with the ADA. The employers and service providers are supposed to take proactive measures to comply with the ADA, given the reasonableness standard. This means that AODA is more proactive while ADA is retroactive. AODA sets a significant number of standards with which the institutions are asked to comply while ADA is largely reliant on user feedback/complaints in order to implement accessibility changes.

What kind of examples have the libraries in the United States developed to make electronic resources accessible?

Planning for access to electronic resources as they are being developed can be easier and therefore less expensive than developing accommodation strategies once a person with a disability needs access. When design decisions are made to ensure that electronic resources are accessible to people with a wide range of abilities, disabilities, and other characteristics, the process is called “universal design.” Considered user characteristics include, but are not limited to, age, race/ethnicity, size, gender, native language, and level of ability to move, hear, or see. Universal design is defined by the [Center for Universal Design \(CUD\)](#) at North Carolina State University as “the design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design.” At CUD, architects, product designers, engineers, and environmental design researchers established a set of principles that can be used to design environments, products, and information resources.

6 APPENDIX

6.1 Acknowledgements

6.2 Resources

6.1 Acknowledgements

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The ACE Toolkit Working Group, comprised of representatives with diverse expertise from the following OCUL institutions has been responsible for the development of this toolkit:

Participating institutions

Algoma University

McMaster University

Queen's University

Ryerson University

University of Guelph

University of Toronto

University of Waterloo

Western University

York University

Membership

Chittenden, Michelle; Coordinator, Services for Students with Disabilities, LRS Librarian, Queen's University

Collins, Nancy; Communications and Liaison Librarian, University of Waterloo

Craig, Dana; Environmental Studies Liaison Librarian, York University

Darnell, Alan; Director; OCUL, Scholars Portal Services

Davidson, Catherine; Associate University Librarian, York University

Davis, Kate; Assistant Director, OCUL, Scholars Portal

Ervin-Ward, Anika; Administration and Communications Coordinator, OCUL

Accessibility Information Toolkit for Libraries

Gayhart, Lisa; Digital Communications Services Librarian, University of Toronto

Gledhill, Tarrah; Network Services Specialist, Information Technology Services, University of Toronto

Glushko, Bobby; Scholarly Communications and Copyright Librarian, University of Toronto

Gow, Athol; Library Accessibility Services, University of Guelph

Greenberg, Amy; Assistant Director (Research & Learning and Member Services), OCUL, Scholars Portal

Isard, Robin; E-Services Librarian, Algoma University

Jin, Lei; Electronic Resources Librarian, Collection Services Team, Ryerson University

Martin, Heather; Copyright Officer and Manager E-Learning, Reserves & ERM, University of Guelph

McTaggart, Judy; Information Services and Resources Associate, Porter Information Services and Resources, University of Waterloo

Michaud, Diane, Former Accessibility Services Librarian, Ryerson University

Pereyaslavskaya, Katya; Project Manager, OCUL, Scholars Portal

Pottier, Anne; Associate University Librarian, McMaster University

Rykse, Harriet; Digital Information Resources Librarian, Western University

Scardellato, Kathy; Executive Director, OCUL

Swartz, Mark; Copyright Specialist, Queen's University

Szigeti, Kathy; Liaison Librarian for Chemistry and Earth Environmental Sciences, University of Waterloo

Trimble, Leanne; Data & Geospatial Librarian, OCUL, Scholars Portal

Walker, Jeff; Manager, Systems Support Team, University of Guelph

Wason, Janet; Co-ordinator, Library Services for Persons with Disabilities, University of Waterloo

Whyte Appleby, Jacqueline; Client Services Librarian, OCUL, Scholars Portal

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