Integrated Accessibility Standards Regulation

Procuring or Acquiring Accessible Goods, Services or Facilities
Acknowledgements

This guide is an initiative of the Global Alliance for Accessible Technologies and Environments (GAATES). GAATES is the leading international not-for-profit organization that brings together individuals and organizations dedicated to promoting accessibility of electronic and communication technologies and accessibility of the built environment. GAATES was incorporated in 2007 by an international consortium dedicated to promoting accessibility worldwide.

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One of the goals of Ontario’s Integrated Accessibility Standards Regulation (IASR), is to ensure that organizations consider the needs of all users, including persons with disabilities, when purchasing goods, services or facilities. If products and services used within your organization are not accessible, they cannot be used by everyone . . . which might deny people the opportunity to become employees or customers of your organization!

While the IASR’s procurement requirements apply only to the Government of Ontario, the Legislative Assembly and designated public sector, all organizations will benefit from establishing accessible procurement policies and procedures. When accessibility is used as one of the criteria for making purchasing decisions, the products, services or facilities purchased will be more universally accessible and can be an important part of welcoming customers to your facility.

In this guide the term ‘customer’ is used to describe any member of the public who has access to an organization’s goods, services or premises. Depending on your organization’s business you may use a different term such as client, member, patient, constituent, parishioner, congregant, patron, consumer or third party organization.
How will this guide help me?

This guide will help you to understand:

• if the IASR’s procurement requirements apply to your organization

• what your organization is required to do

• what steps could be taken in order to make your purchasing practices more accessible

• how to find products and services that will increase your accessibility and customer base

• examples of procurement practices that have incorporated accessible features
Does the accessible procurement requirement apply to my organization?

The requirement applies to the:

- Government of Ontario, the
- Legislative Assembly of Ontario and
- Designated public sector organizations* - See Appendix 2

Commencing January 1, 2012, the Government of Ontario and the Legislative Assembly must incorporate accessibility requirements into their procurement processes (except where it is not practical to do so).

The commencement date for public sector organizations with 50 or more employees is January 1, 2013, and January 1, 2014 for public sector organizations with 1-49 employees.

Note: Private and non-profit organizations are required to have regard for accessibility when designing, acquiring or purchasing self-serve kiosks.
What is my organization required to do?

Incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so.

For example, the accessible good, service, or facility may not be available, or may not be technologically compatible with other goods in your organization. However, if someone asks, you must provide an explanation as to why accessibility features weren’t included.
Steps to consider

Learn more about the needs of people with disabilities

It’s important not to make assumptions about what a person with a disability would need. For example, not everyone who is blind can read Braille. Instead, employees making purchasing decisions should take the time to learn about the various needs of people with disabilities. This will help you and your employees better understand what accessibility means and how to incorporate accessibility criteria and features in a way that most benefits your customers, employees and organization.
**Steps to Consider**

**Include an accessible procurement statement within your procurement policy**

A good starting point is to introduce an accessible procurement statement within your organization’s procurement policy. Such a statement should be developed with input from relevant departments within your organization such as; procurement, human resources, equity, information technology, operations and legal, as well as individuals who have expertise in accessibility. Establishing a clear accessible procurement statement will demonstrate a real commitment to your customers, staff and suppliers.

**An example of an accessible procurement statement might be:**

When procuring goods, services and facilities, the Town of Anywhere will comply with the requirements of the Ontarians with Disabilities Act, 2001, the Accessibility for Ontarians with Disabilities Act, 2005 and its associated standards enacted through regulation, as well as related Town policies. Where applicable, procurement documents will specify the desired accessibility standards to be met and provide guidelines for the evaluation of proposals in respect of those standards. Where it is impractical for the Town to incorporate accessibility criteria and features for procuring or acquiring specific goods, services or facilities, the Manager of Procurement will provide a written explanation, on request.
Steps to Consider

Incorporate accessibility requirements into all procurement competitions

Once your organization has incorporated an accessible procurement statement into its broader purchasing policy, all procurement competitions should incorporate accessibility criteria where practicable. Larger organizations may wish to designate a specific person within their purchasing department to oversee and coordinate accessibility requirements within tenders, Requests for Proposals, etc.

Whether your organization is purchasing, software, hardware, supplies, office equipment, consulting services, or leasing space . . . indeed anything . . . accessibility criteria should be considered.

The charts on the following pages provide some examples:
# Steps to Consider

<table>
<thead>
<tr>
<th>Category</th>
<th>Purchase</th>
<th>What type of accessibility criteria might be included in the procurement process?</th>
<th>How might this result in making the purchase more usable and accessible to everyone?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Computer Hardware</td>
<td>Computer monitors for all staff workstations</td>
<td>Provide support documentation in accessible formats. Describe accessibility features of monitor in documentation.</td>
<td>Allows almost anyone to read the support documentation and use the monitor, even if they have low vision or color blindness.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Permit user to adjust monitor colour and contrast.</td>
<td>Allows almost anyone to adjust the monitor controls, even if they have a broken arm, arthritis, or have limited strength or agility.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Manual controls to be tactilely discernable and operable with one hand with minimal force.</td>
<td></td>
</tr>
</tbody>
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</table>
| Computer Software | Suite of Office Programs for installation on all staff workstations      | • Alternatives such as keyboard actions can be used in place of a mouse  
• Software allows for use of existing accessibility features such as sticky keys  
• Timed responses allow for adjustability of timing  
• Where audible alerts are used, there are alternative visual cues available  
• Colour coding is never used as the sole means of conveying information | • Software not dependent on the mouse opens opportunities for those with a disability or injury that limits their movement or dexterity to use a mouse  
• Functionality is preserved for those that have difficulty in their speed or dexterity  
• Persons with hearing loss or working in a noisy environment will be aware of alerts from the software  
• Persons with vision loss, colour blindness or working in different lighting conditions will be able to distinguish necessary information |
| Office Equipment | Lease of new photocopiers for all departments                             | • Adjustable angle for control panel.  
• Top unit that can be relocated to adjacent table to allow for knee space underneath.  
• Controls allow for voice or tactile input and do not depend on use of touch panel | • Controls easier to read regardless of height of user or whether sitting or standing  
• Wheelchair user can access the copier without sitting sideways  
• Operable by users with low vision |
## Steps to Consider

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</table>
| Consulting Services | Business continuity consulting to develop a corporate plan | • References or evidence from consultant that demonstrates familiarity with alternate means of receiving and presenting material  
• Ability to produce deliverables in accessible formats and produced in a manner that is readily converted to other formats | • All team members regardless of their means of communication can provide input  
• Deliverables can be used by all stakeholders or can be easily converted into a format that is accessible to them |
| Leasing Office Space | Relocation to larger office space | • Use of a designer that is familiar with accessibility and careful selection of an accessibility standard beyond basic building codes to aspire to.  
• Considerations of existing features that won’t be part of your ‘build-out’. Things such as parking, entrances, washrooms or other common use areas. | • The more comprehensive scope of an accessibility standard or guideline will ensure the space is accessible to a broader range of people.  
• The full range of customers and employees have the opportunity to accessibly navigate the route to reach your space. |
Steps to Consider

Set a benchmark for accessibility

When establishing accessibility requirements and evaluation criteria, and wherever possible, choose an existing standard as the benchmark for accessibility. This provides vendors with clear expectations, and supports a fair and equitable bidding process. It also provides your organization with clear criteria for evaluating the bids.

Although there are many accessibility-related standards for many types of goods, services and facilities, here are a few of the more commonly-used standards:

- **AODA Info/Com Standard**  
  - accessible information and communication supports

- **AODA Design of Public Spaces Standard**  
  - features within playgrounds, public eating areas, trails, places where you obtain services, like waiting areas and service counters.

- **WCAG**  
  - web development

- **CSA B651 and its sub-standards**  
  - for environments, interactive devices, etc.

- **Section 508**  
  - technology

Caution: Referencing a standard without a proper understanding of the purpose, scope and technical requirements of the standard can result in unexpectedly costly tenders and proposals. Be sure that you know what you are asking for!
Steps to Consider

**Include accessibility criteria in the evaluation process**

Including accessibility criteria in the tender of bid documents, in itself, does not ensure that the products, services or facilities will be appropriately accessible to persons with disabilities. The bid evaluation process should include an analysis of the bidders’ response to the procurement accessibility requirements.

Vendors may be quick to promise, but may not have comprehensive training on accessibility or knowledge of your customers’ or staffs’ needs. Shortcomings on accessible products may not be false advertising but simply a lack of awareness on the part of vendor about the functional requirements of the bid. Procurement staff needs to have a clear understanding of what they require.

Depending upon the complexity of the tender requirements’, your organization may consider hiring outside expertise to assist with the technical evaluation of the accessibility components of the vendor submissions.
How do we identify potential vendors who are capable of providing accessible goods, services or facilities?

Identifying potential vendors capable of providing accessible goods, service and facilities requires careful consideration. Ideally, vendors will be able to demonstrate significant prior experience in providing similar accessible goods, services or facilities . . . but be sure to ask for references for verification. However, vendors who do not have such prior experience should not necessarily be excluded from the process. Consider asking vendors to include in their bid, a written statement of their interpretation of the accessibility requirements of the bid. If you are interviewing potential vendors as part of the tender evaluation process, be sure to include some questions related to accessibility.

Referrals and word-of-mouth arguably remain the best ways to find suitable vendors. Consider using your professional network to identify other organizations with similar purchasing needs as your own, to share contacts and experiences. An internet search for the goods or services you are seeking, along with the term, “accessible”, “AODA” or “ADA” can often guide you to suitable sources.

As potential vendors become more familiar with the AODA accessibility standards, it will become much easier for your organization to identify suitable vendors for the wide range of goods, service and services that you purchase.
Where can I learn more?

The Government of Canada has developed an excellent Accessible Procurement Resource Toolkit which can very quickly provide your organization with the accessibility criteria it needs for a wide variety of goods, service and facilities. The Toolkit is a web-based resource which is easy to use, as well as maintained and updated on an ongoing basis... and it is free to use! Appendix 1 of the Guide provides instructions on how to access and use this Accessible Procurement Resource Toolkit.

Most other sources for assistance with accessible procurement relate primarily to purchasing information technology, including:

- Government of Ontario website
  http://www.ontario.ca/AccessON

- BuyAccessible.gov (USA)
  http://www.buyaccessible.gov

- IT Procurement Toolkit (Ireland)
  http://www.universaldesign.ie/useandapply/ict/itprocurementtoolkit
Glossary of Terms used in this Guide

**Accessible formats and communication supports**  Standard print is sometimes not an accessible means to communicate. Similarly, some people may need to communicate using methods that are not direct conversation. Alternatives to standard print are often referred to as “accessible formats” and methods to enable communication between people as “communication supports”.

**American Sign Language (ASL)** Language used by many individuals who are deaf or hard of hearing. ASL uses hand shapes, positions, movements, facial expressions, and body movements to convey meaning.

**Braille** This is an alternative format for people who are blind or deafblind. Braille is a tactile system of raised dots representing letters or a combination of letters of the alphabet. Braille is produced using Braille transcription software.

**Captioning** Captioning translates the audio portion of a video presentation by way of subtitles or captions. They usually appear on the bottom of the screen.

**DAISY** DAISY stands for Digital Accessible Information Systems. DAISY digital formats assists people who, for various reasons, have challenges using regular printed media. For example, DAISY digital talking books offer the benefits of regular audiobooks, but they are superior because enables readers to navigate through the material, like you could reading a book.

**Screen reader software** This software converts text that is displayed on a computer monitor to voice (using a speech-synthesizer) or to Braille.

**Structured electronic files** A structured electronic file includes information about how elements of the document are formatted. These elements would be titles, section headings, font sizes, colours, etc. Structured electronic files make is easier to produce alternate accessible formats and allow screen readers to navigate the information effectively.
Appendix 1

Accessing and using Starling Access Services’ Accessible Procurement Toolkit

The Accessible Procurement Toolkit (AP-Toolkit) is a Web-based application which can be accessed at http://www.ap-toolkit.info/. The toolkit is a great resource that will help organizations meet their accessible procurement obligations and purchase products that are useful to as many users as possible.

The toolkit can be used in many different ways:

1. Just browse! The products and services are divided into categories and can be easily browsed. Clicking on a category brings up a menu of more specific items, including:
   - ‘Definition’: provides a short description of the item
   - ‘Requirements’: provides clauses that could be used in a contract
   - ‘Environmental’: provides details on any environmental sensitivities
   - ‘Advice’: provides guidance on using the product safely and effectively

2. Search by keywords. This method allows you to narrow the type of content you’re searching for through a couple of steps. First, choose the type of content you want to search:
   - Products/Services
   - Requirements/Procurement Clauses
   - Advice for Usage/Implementation
   - Environmental Considerations

Second, choose if you want the toolkit to look for any or all of your search words or to match a phrase. Lastly, enter your search words and click ‘Search’.
Appendix 1

3. Search by a product code.

The toolkit offers two choices for searching by product code:

- GSIN or FSC/PSC codes
- UNSPSC codes

As a first step, choose if you want the search to match any of your words/numbers or to match all words or numbers. Second, enter your code, keywords or phrase and click ‘Search’.
Appendix 1

Integrated accessibility standards regulation

Procuring or acquiring accessible goods, services or facilities
Appendix 2
Designated public sector organizations

Organizations that qualify as ‘public sector’ are generally summarized below. The full copy of the IASR provides further definitions for each of these categories.

- District school boards
- Hospitals
- Colleges of applied arts and technology
- Universities
- Public transportation organizations
- Organizations listed in Column 1 of Table 1 of Ontario Regulation 146/10 made under the Public Service of Ontario Act, 2006