



:. ontario library association

Accessibility Directorate of Ontario
Ministry of Community and Social Services
777 Bay Street, Suite 601a
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[sent via email]

March 18, 2011

We thank the Ministry of Community and Social Services for the opportunity to respond to the Proposed Integrated Accessibility Regulation. The Ontario Library Association represents more than 5,000 members who work in the public, academic, school, and special library sectors. Our members support an accessible Ontario.

There are a number of areas in the proposed regulation we wish to clarify or comment upon:

Part 1: General

Section 7: Training

Libraries rely on external individuals and organizations to deliver some programs and services, often on a very occasional basis (for example, visiting author talks). We recommend including wording that ensures organizations work with external service providers that have themselves obtained training. For example: "Every obligated organization shall ensure that training is provided for *or has been obtained* on the requirements of the accessibility standards".

Part 2: Information and Communication Standards

Section 14: Accessible websites and web content:

We agree that adherence to an internationally recognized web content accessibility standard is required (World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA) but request that a consideration be made in adherence to the timeline for conforming should changes (if any) to these standards occur as this is outside of our control.

We support requirements that the internet and web sites of obligated organizations be accessible, notwithstanding the hardware used, but note that systems (i.e. online integrated library systems, discovery layers) which provide the public search feature for the collection via the web are commercial software and would be considered under section 14.6. Libraries



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also provide digital information that can be accessed in a number of ways beyond web sites including a range of mobile devices.

The Act needs also to consider that libraries link to a myriad of external web sites and cannot control adherence to web standards of external sites.

Section 18: Libraries of educational and training institutions

We are not clear on why a college, university, or school library would be obligated to 'provide, procure or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for a person with a disability, upon request'. Section 19: Public Libraries, requires that 'every obligated organization that is a library board shall provide access to or arrange for the provision of access to accessible materials where they exist.' We recommend Section 18. 1 replace 'upon request' with 'where available'. If the intent is for all materials (rather than those that are available or exist) in an educational library collection to be available in an accessible format, publishers must be compelled in these standards to produce materials in this way.

Section 19: Public Libraries

We recommend using the phrase 'where available' rather than 'where they exist' to align with the wording in section 15.1.1.i

The concern here is that the existence of accessible materials does not mean they may be available. For example, an audio version of a book may exist at the Library of Congress in the United States, but it is not available to Canadian libraries.

We thank you for your consideration and efforts in making Ontario a leader in accessibility.

Best regards,

A handwritten signature in cursive script that reads "SPaterson".

Shelagh Paterson,
Executive Director